Volume-3 Issue-4(II) | August-2026 *ISSN: 3065-9191*

The International Journal of Commerce Management and Business Law in International Research

Double-blind peer-reviewed /refereed, open access online International journal



Chief Editor
Dr. Santosh P. Mane

Volume-3 Issue-4 (II) | August-2026 *ISSN: 3065-9191*

Double-blind peer-reviewed /refereed, open access online International journal



Publisher
Royal International Global LLC
16192 Coastal Highway, County of Sussex,
Lewes, Delaware 19958 USA

JOURNAL PARTICULARS

Name of Journal	The International Journal of Commerce Management and Business Law in International Research
Frequency	Bi-Monthly (February, April, June, August, October and December)
ISSN	3065-9191
Publisher	Royal International Global LLC 16192 Coastal Highway, County of Sussex, Lewes, Delaware 19958 USA Email: ceo@royaligllc.us Website: https://royaligllc.us
Chief Editor	Santosh P. Mane
Copy right	Royal International Global LLC
Starting Year	October 2024
Subject	Inter-Disciplinary
Review Process	Double Blind Review Process
Language	English
Publication Format	online
Access	OPEN ACCESS
License	Creative Commons Attribution 4.0 International
Phone No.	(+1) 3023033026
Email	**ewbr.us@gmail.com**
Journal Website	**https://ewbr.us**
Registered office Address	CEO Royal International Global LLC 16192 Coastal Highway, County of Sussex, Lewes, Delaware 19958 United States of America (USA) Email: ceo@royaligllc.us
Admin. Office Address	CEO Royal International Global LLC 16192 Coastal Highway, County of Sussex, Lewes, Delaware 19958 United States of America (USA) Email: ceo@royaligllc.us

The International Journal of Commerce Management and Business Law in International Research

ISSN: 3065-9191
Volume No-3, Issue 4(II), August 2026
Publication Language – English
Periodicity of Publication- Monthly
Email: ewbr.us@gmail.com
Website: https://ewbr.us

Chief Editor
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Royal International Global LLC
16192 Coastal Highways, County of Sussex, Lewes, Delaware 19958
United States of America (USA)
Email: ceo@royaligllc.us website: https://royaligllc.us

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ISSN: 3065-9191
The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR),
Volume 3| Issue 4(II)| August 2026

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Manuscript ID:
TIJCMBLIR-2026-030401

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 16 July 2026

Revised: 26 July 2026

Accepted: 13 Aug. 2026

Published: 31 Aug. 2026

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Email: nam12613@gmail.com

DOI:
10.5281/zenodo.22105280
DOI Link:
https://doi.org/10.5281/zenodo.22105280





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Entrepreneurship Among Women in The Dairy Farming: Challenges, Opportunities and Economic Viability.

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Abstract:

The study highlights that women's entrepreneurship in the dairy farming serves as a vital instrument for rural livelihood security, income stabilization, and socio-economic empowerment. The findings reveal that women dairy entrepreneurs predominantly operate small-scale, low-capital enterprises embedded within household economies, making dairy farming a viable and resilient livelihood option rather than a high-investment commercial venture. Despite facing persistent challenges such as limited access to credit, market volatility, time constraints due to domestic responsibilities, and gaps in technical training, a majority of respondents reported improved household income, enhanced decision-making power, and positive impacts on children's education. Institutional support through government schemes, veterinary services, cooperatives, and self-help groups has contributed positively, though its reach and effectiveness remain uneven. Overall, the study underscores that women-led dairy entrepreneurship holds significant potential for inclusive rural development and gender empowerment; however, its long-term economic viability and scalability depend on strengthened financial inclusion, capacity building, institutional linkages, and gender-responsive policy interventions. By addressing these structural constraints, dairy entrepreneurship can evolve into a more sustainable and transformative pathway for rural women, contributing meaningfully to economic resilience and equitable growth.

Keywords: *Women Entrepreneurship, Dairy Farming, Economic Viability, Women Empowerment; Institutional Support.*

Introduction:

Entrepreneurship is widely recognized as a critical driver of economic development, employment generation, and social transformation, particularly when it involves marginalized groups such as women. In rural India, women's participation in entrepreneurial activities has gained importance as a means of enhancing household income, reducing poverty, and promoting inclusive growth. Among various agricultural and allied activities, the dairy farming occupies a unique position due to its low capital requirements, regular income generation, and compatibility with women's traditional roles. Women play a central role in dairy-related activities such as animal care, milking, feeding, and processing of milk products. However, their contribution often remains undervalued and inadequately reflected in economic statistics due to prevailing gender norms and limited access to resources. In recent years, increased institutional support through government schemes, self-help groups (SHGs), and dairy cooperatives has encouraged women to move beyond unpaid labour towards entrepreneurial engagement in the dairy sector.

Despite its potential, women dairy entrepreneurs continue to face several challenges, including lack of access to finance, limited technical knowledge, market uncertainties, time constraints due to domestic responsibilities, and gender-based social barriers.

At the same time, growing demand for milk and milk products, expanding cooperative networks, and policy support provide significant opportunities for enterprise devel Evaluating the economic viability and impact of women-led dairy enterprises is therefore essential for understanding their sustainability and role in rural development. Opment. This study aims to analyze entrepreneurship among women in the dairy industry by examining their socio-economic profile, enterprise characteristics, challenges, institutional support, and economic outcomes, thereby offering insights for policy formulation and development planning.

How to Cite this Article:
Chandanshive, N. D., & Kamble, C. P. (2026). Entrepreneurship Among Women in The Dairy Farming: Challenges, Opportunities and Economic Viability. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 1–6. https://doi.org/10.5281/zenodo.22105280

Objectives Of the Study

- To study the socio-economic background of women dairy entrepreneurs.
- To identify the major challenges encountered by women in the dairy sector.
- To assess the available institutional support and opportunities.
- To evaluate the economic viability and sustainability of women-led dairy enterprises.

Research Methodology:

A sound research methodology is fundamental to the credibility and reliability of any academic inquiry. The present study adopts a systematic and empirical approach to examine the role, challenges, and viability of women's entrepreneurship in the dairy farming. The methodology used in this study is detailed below.

The study follows a descriptive and analytical research design. Descriptive research has been employed to collect detailed socio-economic and entrepreneurial information from women in the dairy farming, while analytical methods have been used to evaluate the challenges faced, opportunities available, and the economic viability of their enterprises. A total of 100 Women respondents who engaged in dairy entrepreneurship (self-owned, family-run, cooperative members, and SHG participants) were selected to ensure geographic and social representation. A structured questionnaire was used to collect first-hand information from the respondents. Personal interviews were conducted to ensure clarity and comfort of respondents. Secondary data collected from NDDB, Ministry of Agriculture, and Department of Animal Husbandry Reports and publications. Academic research papers, books, government policy documents and statistical handbooks.

Entrepreneurship Among Women in The Dairy Industry:

In the context of a rapidly evolving rural economy, women's entrepreneurship is increasingly recognized as a powerful tool for poverty alleviation, employment generation and socio-economic development. In India, where agriculture and allied activities continue to be the backbone of rural livelihoods, the dairy industry has emerged as a key sector that not only ensures food and nutritional security but also offers sustainable entrepreneurial opportunities for rural women. Among the various sectors within agriculture, dairy is unique in its low capital requirements, continuous income flow and potential for value addition, making it particularly suitable for women entrepreneurs.

Women have historically played a central role in dairy activities, especially in rural and semi-urban areas. Their responsibilities typically include milking, feeding, cleaning, healthcare of livestock and processing of milk products. However, their role is often undervalued and underrepresented in formal economic assessments and decision-making structures. With increasing awareness, literacy and institutional support, a growing number of women are transitioning from being informal workers in dairy households to active entrepreneurs managing small-scale and even medium-scale dairy enterprises.

The significance of women's entrepreneurship in the dairy industry is manifold. It not only contributes to enhancing family income but also promotes women's empowerment, improves their status in the household and community and fosters inclusive rural development. Women-led dairy enterprises have been found to play a crucial role in strengthening household food security, children's education, and healthcare spending. Moreover, when women are organized into Self-Help Groups (SHGs) or dairy cooperatives, they benefit from collective bargaining, access to microfinance and training opportunities that further improve their economic outcomes.

Despite these opportunities, women dairy entrepreneurs face numerous challenges. These include limited access to formal credit, lack of technical knowledge and training, restricted mobility, inadequate veterinary services, dependency on intermediaries for marketing, and societal gender biases. These factors often hinder the scalability and sustainability of their enterprises. Therefore, studying the entrepreneurial journey of women in the dairy sector, including both the challenges they face and the opportunities they harness, is vital for designing effective policies and development programs.

This study focuses on the entrepreneurial engagement of women in the dairy industry, with the aim to understand their socio-economic background, assess the viability of their enterprises, evaluate the challenges they encounter and identify the support mechanisms that contribute to their success. Through empirical research and analysis, the study seeks to provide actionable insights into how women's dairy entrepreneurship can be strengthened as a pillar of rural economic resilience and gender-inclusive growth

Data analysis:

Socio-Economic Profile of Respondents:

Variable	Categories	No. of Respondents	Percentage (%)
Age group	18–25	12	12%
	26–35	28	28%
	36–45	35	35%
	46–55	18	18%
	56 and above	7	7%
Education level	Illiterate	15	15%
	Primary	20	20%
	Secondary	25	25%
	Higher Secondary	22	22%
	Graduate and above	18	18%
Marital Status	Married	85	85%
	Unmarried	5	5%
	Widowed	7	7%
	Divorced	3	3%
Caste Category	SC	22	22%
	ST	14	14%
	OBC	38	38%
	General	26	26%
Monthly Household Income (Rs.)	Below Rs.5,000	20	20%
	Rs.5,001–Rs.10,000	30	30%
	Rs.10,001–Rs.20,000	28	28%
	Rs.20,001–Rs.30,000	22	22%

Regarding the age distribution, the majority of the participants belong to the prime working-age brackets, with 35% falling within the 36–45 years category and 28% in the 26–35 years group. Younger adults aged 18–25 years comprise 12%, middle-aged respondents aged 46–55 years account for 18%, and older adults aged 56 years and above represent the smallest share at 7%, indicating that the data is primarily shaped by mature individuals with active family and social responsibilities. In terms of educational attainment, the sample demonstrates moderate literacy levels; a quarter of the respondents (25%) have attained secondary education, 22% possess higher secondary qualifications, 20% have completed primary education, and 18% are graduates or above, while 15% of the participants are illiterate. This indicates that over 80% of the sample possesses some level of formal education.

Analysis of marital status reveals that a vast majority of the respondents, specifically 85%, are married, whereas unmarried individuals, widowed participants, and divorced individuals account for 5%, 7%, and 3% respectively, reflecting a demographic heavily grounded in household-level dynamics. The caste category distribution illustrates diverse social representation across the sample, with Other Backward Classes (OBC) forming the largest segment at 38%, followed by the General category at 26%, Scheduled Castes (SC) at 22%, and Scheduled Tribes (ST) at 14%, thereby ensuring inclusive cross-sectional insights. Finally, the monthly household income highlights financial vulnerabilities within the study area, as earnings are heavily concentrated in the lower-to-middle income ranges; 30% of households earn between Rs.5,001 and Rs.10,000, 28% earn between Rs.10,001 and Rs.20,000, 22% earn between Rs.20,001 and Rs.30,000, and 20% survive on an income below Rs.5,000, meaning half of the surveyed population lives on a monthly household income of Rs.10,000 or less.

Dairy Entrepreneurship Characteristics:

Variable	Categories	No. of Respondents	Percentage (%)
Years in Dairy Enterprise	<1 year	11	11%
	1–3 years	29	29%
	4–6 years	43	43%
	7+ years	17	17 %
Scale of Operation	Micro (1–3 animals)	42	42%
	Small (4–10 animals)	40	40%
	Medium (11–20 animals)	12	12%
	Large (>20 animals)	6	6%
Type of Ownership	Self-owned	39	39%
	Family business	28	28%
	Cooperative member	19	19%
	SHG based	14	14%

Regarding experience in the sector, the majority of the respondents possess moderate to substantial tenure in the dairy business. Specifically, 43% of the participants have been engaged in the enterprise for 4–6 years, while 29% report 1–3 years of experience. Those with long-term involvement (7+ years) account for 17% of the sample, whereas newcomers with less than 1 year of experience represent the smallest group at 11%. This distribution indicates that the majority of respondents possess practical, hands-on familiarity with dairy farming operations.

In terms of the scale of operation—measured by herd size—the enterprise is heavily dominated by smallholder and micro-scale units. Micro-enterprises consisting of 1–3 animals comprise 42% of the respondents, closely followed by small-scale units (4–10 animals) at 40%. Medium-scale operations (11–20 animals) account for 12%, and large-scale operations (greater than 20 animals) constitute only 6%. Consequently, over 82% of the surveyed dairy farmers operate within micro and small-scale capacities, highlighting the subsistence-to-semi-commercial nature of dairy farming in the region.

Finally, the analysis of ownership structure reveals diverse operational frameworks, with self-owned enterprises forming the largest segment at 39%. This is followed by family businesses at 28%, cooperative members at 19%, and Self-Help Group (SHG) based ventures accounting for 14% of the respondents. This blend of individual ownership and collective institutional linkages underscores the collaborative nature of the local dairy ecosystem.

Challenges Faced by Women Entrepreneurs:

Challenge Type	No. of Respondents	Percentage (%)
Lack of capital/credit access	28	28%
Market access and price fluctuations	18	18%
Time constraints (household burden)	12	12%
Veterinary/animal health issues	18	18%
Gender discrimination/social barriers	10	10%
Lack of training/technical skills	14	14%

Financial constraints emerge as the most prominent obstacle, with 28% of the respondents reporting a lack of capital or credit access as their primary barrier, underlining the persistent difficulty women face in securing institutional financing for enterprise expansion. This is followed jointly by market access and price fluctuations and veterinary and animal health issues, each cited by 18% of the participants, reflecting vulnerabilities in output marketing, milk pricing stability, and livestock health management.

Additionally, 14% of the respondents pointed to a lack of training and technical skills as a major impediment to optimizing productivity. Household dynamics also heavily impact female entrepreneurs, with 12% highlighting time constraints driven by heavy household burdens that restrict their full business focus. Finally, 10% of the participants experienced gender discrimination and social barriers, indicating that while socio-cultural headwinds exist, economic and infrastructural factors like credit and veterinary support are currently the dominant operational bottlenecks for women in the industry.

Support and Opportunities:

Support Received/Available	No. of Respondents	Percentage (%)
Training on dairy management	19	19%
Government subsidy/loan accessed	35	35%
SHG participation	15	15%
NGO/cooperative support	11	11%
Veterinary support facilities	20	20%

Financial assistance stands out as the most widely utilized form of support, with 35% of the respondents having accessed a government subsidy or loan, highlighting the critical role of public welfare schemes in capitalization. This is followed by veterinary support facilities, utilized or accessed by 20% of the participants, reflecting vital institutional backing for livestock health management.

Furthermore, 19% of the respondents have received formal training on dairy management, indicating moderate outreach in capacity-building initiatives. Community and organizational networks also play a supportive role, with 15% of the participants engaged in Self-Help Group (SHG) participation and 11% receiving direct NGO or cooperative support. Collectively, these findings indicate that while government credit schemes have reached a significant portion of the entrepreneurial base, there is substantial room to scale up technical training, grassroots institutional networks, and localized veterinary extensions.

Economic Viability and Impact:

Indicator	No. of Respondents	Percentage (%)
Enterprise is economically viable	24	24%
Income increased after starting enterprise	11	11%
Gained decision-making power in	32	32%

family		
Improved children's education	16	16%
Planning to expand business	17	17%

Empowerment outcomes emerge as the most prominent positive impact, with 32% of the respondents reporting that they have gained decision-making power in the family as a direct result of their entrepreneurial engagement. Regarding direct economic assessments, 24% of the participants affirm that their enterprise is economically viable, while 11% noted a measurable increase in overall income after starting the enterprise.

Beyond immediate financial returns, the venture has catalyzed broader social benefits: 16% of the respondents observed an improvement in children's education funded through enterprise earnings. Furthermore, forward-looking business aspirations are evident, with 17% of the participants actively planning to expand their business. Collectively, these findings underscore that while direct income enhancement and business viability are reported by a smaller subset of respondents, the secondary impacts—particularly familial empowerment and educational investments—demonstrate the transformative social value of women-led dairy initiatives.

Suggestions:

1. **Strengthen Access to Government Schemes and Credit:**

Given that only 35 per cent of respondents have accessed government subsidies or loans, there is a need to simplify application procedures and improve outreach at the village level. Dedicated women-friendly credit windows through banks, cooperative societies, and microfinance institutions should be promoted, along with financial literacy programmes to enhance awareness and utilization.

2. **Expand Training and Capacity-Building Initiatives:**

The low proportion of women receiving training in dairy management (19 per cent) indicates an urgent need for regular, decentralized, and need-based training programmes. Training should focus on scientific animal husbandry, fodder management, disease prevention, value addition, and basic enterprise management. Collaboration with Krishi Vigyan Kendras (KVKs), dairy departments, and NGOs can enhance training coverage and effectiveness.

3. **Strengthen Veterinary and Extension Services:**

With only 20 per cent of respondents having access to veterinary support, strengthening doorstep veterinary services and mobile animal health clinics is essential. Timely vaccination, artificial insemination, and advisory services can significantly improve productivity and reduce income losses, thereby enhancing enterprise sustainability.

4. **Promote SHG and Cooperative Participation:**

Low participation in SHGs (15 per cent) and cooperatives (11 per cent) highlights the need to promote collective institutions for women dairy entrepreneurs. Encouraging women-only SHGs and dairy cooperatives can improve access to credit, inputs, training, and markets, while also enhancing bargaining power and peer support.

5. **Enhance Institutional Outreach and Convergence:**

Limited NGO and cooperative support suggest gaps in institutional engagement. Greater convergence among government departments, NGOs, cooperatives, and financial institutions is required to provide integrated support services covering finance, training, veterinary care, and market access.

Conclusion

The study highlights that women's entrepreneurship in the dairy farming serves as a vital instrument for rural livelihood security, income stabilization, and socio-economic empowerment. The findings reveal that women dairy entrepreneurs predominantly operate small-scale, low-capital enterprises embedded within household economies, making dairy farming a viable and resilient livelihood option rather than a high-investment commercial venture. Despite facing persistent challenges such as limited access to credit, market volatility, time constraints due to domestic responsibilities, and gaps in technical training, a majority of respondents reported improved household income, enhanced decision-making power, and positive impacts on children's education. Institutional support through government schemes, veterinary services, cooperatives, and self-help groups has contributed positively, though its reach and effectiveness remain uneven. Overall, the study underscores that women-led dairy entrepreneurship holds significant potential for inclusive rural development and gender empowerment; however, its long-term economic viability and scalability depend on strengthened financial inclusion, capacity building, institutional linkages, and gender-responsive policy interventions. By addressing these structural constraints, dairy entrepreneurship can evolve into a more sustainable and transformative pathway for rural women, contributing meaningfully to economic resilience and equitable growth.

Acknowledgement

The author would like to express sincere gratitude to all those who provided valuable support and encouragement in completing this research paper titled "Entrepreneurship Among Women in the Dairy Farming: Challenges, Opportunities and Economic Viability."

Financial support and sponsorship

Nil.

Conflicts of interest

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

Reference List:

1) https://www.nddb.coop/
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Manuscript ID:
TIJCMBLIR-2026-030402

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 16 July 2026

Revised: 26 July 2026

Accepted: 13 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22105350
DOI Link:
https://doi.org/10.5281/zenodo.22105350

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Section 304 of the Bhartiya Nyaya Sanhita, 2023: A Critical Analysis of the Legislative Rationale, Essential Ingredients and Emerging Judicial Interpretation

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Abstract

The Bharatiya Nyaya Sanhita, 2023 has incorporated Section 304, which for the first time in the Indian criminal law recognizes snatching as an independent offence. Before the introduction of this law, the cases involving chain snatching, mobile phone snatching, and other similar offences were tried under the provisions dealing with theft or robbery under the Indian Penal Code, 1860. Though, the objective of the legislation was to counter the increasing cases of street crimes by means of introducing an independent statutory offence, but the provision itself has generated several issues with respect to its interpretation because of undefined terms such as "suddenly", "quickly", and "forcibly". This paper has made an attempt to conduct the doctrinal analysis of Section 304 by understanding the legislative rationale behind its introduction, highlighting the basic elements of the offence and studying the evolving judicial interpretation with respect to the case of State v. Suhail (2026). This research paper has also attempted to make a comparison between the offences of snatching, theft and robbery and has pointed out the problems that might be faced in the process of investigation, prosecution, and judicial application.

Keywords: *Bharatiya Nyaya Sanhita, 2023, Section 304, Snatching, Theft and Robbery, Criminal Jurisprudence, Judicial Interpretation*

Introduction

The introduction of a separate offence of snatching under Section 304 of the Bharatiya Nyaya Sanhita, 2023 represents a significant change from the traditional framework of property offences in Indian criminal law. Section 304, which acknowledges snatching as a distinct criminal offense for the first time in Indian criminal law, is one of the significant changes brought about by the BNS. Depending on the nature of each case, crimes including chain snatching, cell phone snatching, and purse snatching were typically prosecuted under the laws pertaining to theft or robbery under the Indian Penal Code. The legislature has made an effort to combat the rising number of street crimes involving the sudden or coerced taking of items from another person's possession by establishing a separate offense.

Although Section 304's introduction represents a significant legislative advancement, it also presents a number of practical and interpretive issues. The clause uses terms like "suddenly", "quickly", and "forcibly" without clarifying their legal meaning, which leaves the key components of the offense unclear. It also calls into question how it differs from the current offenses of robbery and theft, especially when there is little use of force. Although the recent ruling in *State v. Suhail (2026),* one of the first documented rulings pertaining to Section 304, outlines certain crucial components of the offense, there are still a number of unanswered problems regarding its interpretation and implementation.

In light of this, the study analyses the fundamental components of Section 304, examines its legislative justification, and assesses its evolving judicial interpretation. It also addresses the practical and interpretive challenges arising from the provision by doctrinal method of research.

Legislative Rationale Behind the Introduction of Section 304 of the Bharatiya Nyaya Sanhita, 2023

Snatching was not recognized as a separate crime under the Indian Penal Code, 1860. Chain snatching, cell phone snatching, and purse snatching incidents were typically prosecuted as theft under Section 378 or as robbery under Sections 390 and 392 of the Indian Penal Code when there was violence or a fear of immediate harm.

How to Cite this Article:
Deshpande, H. (2026). Section 304 of the Bhartiya Nyaya Sanhita, 2023: A Critical Analysis of the Legislative Rationale, Essential Ingredients and Emerging Judicial Interpretation. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 7–10. https://doi.org/10.5281/zenodo.22105350

These regulations made it possible to prosecute such offenses, but they did not really address the unique characteristics of snatching, which usually entails the abrupt or quick removal of property straight from a person's hands in public areas.[1] Parliament added Section 304 to the Bhartiya Nyaya Sanhita ,2023 to make Snatching a distinct crime due to its rising frequency. The Bureau of Police Research and Development (BPR&D) claims that the provision was put in place in reaction to the rising number of street crimes, including mobile phone and chain snatching, which have become widespread in cities. The BPR&D further noted that these offenses are more serious than the simple loss of tangible property because contemporary mobile phones frequently hold sensitive financial and personal data[2].

Curiously enough, the legislative background does not reveal any particular proposal made by the Law Commission of India for the introduction of a separate offence of snatching. Likewise, the Statement of Objects and Reasons of the Bharatiya Nyaya Sanhita does not explain the need to distinguish snatching as an offence different from the other property offences. The legislative background can therefore be considered mainly through the explanations provided by the government and increased street crime.[3]

Even though the creation of Section 304 signifies that there was a legislative intent behind recognizing snatching as an independent criminal activity, one is left wondering whether there was an inadequacy in the existing laws on theft and robbery in terms of their ability to address crimes of snatching. Undoubtedly, the creation of this offence indicates the gravity of street crimes, but there are certain concerns about the possibility of overlapping with the allied offences and the lack of clarity in distinguishing snatching from theft and robbery in the absence of proper legislation. It becomes even more crucial because criminal laws need to be framed in a very precise manner so that they are consistent and fair in their application.

Essential Ingredients of the Offence of Snatching under Section 304 of the Bharatiya Nyaya Sanhita, 2023

Section 304 of the Bharatiya Nyaya Sanhita, 2023 recognizes an offence of snatching for the first time in Indian criminal jurisprudence as an independent property crime[4]. As opposed to the Indian Penal Code where such acts were criminalized on the basis of general offences like theft and robbery, as determined by the prevailing facts and circumstances of the case[5], Section 304 criminalizes the act of suddenly, quickly or forcibly taking away movable property from the possession of another individual[6]. While the provision seems to have taken into account the unique aspect of offences committed on streets through direct deprivation of property from the victim, the language used in the provision raises numerous interpretative questions.

Essential Ingredients of Snatching

An interpretation of Section 304 reveals that the following ingredients are an essential part of the crime of snatching:

- dishonestly taking movable property;
- there should be possession of such movable property by another person;
- it should be taken or seized from him;
- taking should be done suddenly, swiftly or forcibly.

All these ingredients seem quite simple, but each one of them poses a number of queries relating to its interpretation.

(a) Dishonest Intention-: The offence of snatching is founded upon the existence of **dishonest intention**[7], a concept which continues from the law relating to theft. The prosecution must establish that the accused intended to cause wrongful gain to himself or wrongful loss to another while taking the property[8]. In the absence of dishonest intention, the offence under Section 304 cannot be made out.

(b) Property Owned by Another-: In contrast to regular theft, Section 304 requires that the property in question be in the immediate hands of another person. The legislator's goal in enacting the clause was to make it illegal for crimes like chain snatching and cell phone snatching that cause a victim to lose custody of their property right away[9].

(c) Grabs, Seizes, or Removes-: Three distinct phrases have been deliberately used by the legislature: "seizes", "grabs", and "takes away".[10] The BNS does not define any of the them. Thought, the dictionary meaning of these words are different, they all refer to the act of taking control of property. It may be unclear whether these terms have various legal meanings or just refer to the same act using different wording if there are no statutory definitions. Therefore, judicial clarification on this is required.

(d) "Suddenly", "Quickly" or "Forcibly"-: This could well be the most important aspect of Section 304. The legislature has used the phrases "suddenly", "quickly", and "forcibly" without defining them anywhere in the statute[11]. Also, the use of the word "or" shows that either of these situations alone count to the crime.

Nevertheless, the interpretation of criminal force in the case of *State v. Suhail* (2026) tends to regard criminal force as one of the basic elements of the crime[12]. This kind of interpretation does not necessarily coincide with the actual language used in Section 304, which states that the offence can be

committed in cases where the property is taken suddenly, quickly, or forcibly. Therefore, an interpretative issue that emerges in this case concerns whether criminal force is an absolute requisite, or a sudden or quick taking of property deem to be snatching.

Comparative Analysis of Theft, Snatching & Robbery

Particulars	Theft	Snatching	Robbery
Nature of taking	Dishonest removal of property	Sudden, quick or forcible taking from possession	Theft/extortion attended by violence or fear of instant violence
Use of force	Not necessary	Uncertain under Section 304	Essential
Separate offence	Yes	Yes (BNS)	Yes
Victim's possession	Required	Direct possession/person	Direct possession/person
Examples	Secret removal of property	Chain, mobile phone snatching	Armed robbery, violent theft

Emerging Judicial Interpretation: An Analysis of *State v. Suhail* (2026)

The inclusion of Section 304 in the Bharatiya Nyaya Sanhita, 2023, represents a recent legislative change, and as a result the judicial interpretation of that provision is at an early stage. An early reported decision concerning the offence of snatching is *State v. Suhail* (Judgment dated 30 March 2026), which was handed down by the Court of JMFC-02, Karkardooma Courts, Delhi. Even though this judgment is not binding precedent, it is of great importance since it constitutes one of the first attempts by the courts to interpret the essential elements of Section 304 and to apply them to the facts of a criminal case.[13]

In the present case, the prosecution alleged that the accused had snatched the mobile phone of the complainant. The Court had, therefore to examine whether the prosecution had proved the elements constituting the offence of snatching under Section 304 of the Bharatiya Nyaya Sanhita.[14]

The Court observed that for making out an offence under Section 304 , the prosecution has to prove that the accused had acted with dishonest intention and that the movable property was suddenly or quickly or forcibly seized or grabbed or taken away from the possession of another person. However, in terms of the facts of the case, the Court found material inconsistencies in the prosecution evidence. The complainant initially told the police that the mobile phone was snatched from his hand but at the trial he testified that it was taken from his back pocket. The Court held that the contradiction was material and that the prosecution had failed to prove the offence beyond reasonable doubt and acquitted the accused.[15]

Another important issue is distinguishing snatching from robbery involving minimal force. The judgment provides no objective criteria for determining when conduct crosses from theft to snatching or from snatching to robbery. Clear judicial guidance is therefore necessary for consistent application of Section 304.

Thus, the holding in *State v. Suhail* is just the beginning of judicial interpretation of Section 304. It pinpoints the constituent elements of the offence but does not fully resolve the ambiguities inherent in the statutory language. With more cases being filed under the Bharatiya Nyaya Sanhita, 2023 the higher judicial forums will play a crucial role in clarifying the scope of the provision and ensuring its uniform application.

Interpretational and Practical Challenges in the Application of Section 304 of the Bharatiya Nyaya Sanhita, 2023

The inclusion of Section 304 in the Bharatiya Nyaya Sanhita, 2023 manifests the intention of the legislature to treat snatching as a separate crime on property. Nevertheless, the implementation of the provision is likely to be faced by several interpretative difficulties. Although the provision aims to deal with an emerging trend of street crime, some of its clauses have still left ambiguity in law. Without clarification of these ambiguities, the inconsistent application of the provision will defeat its purpose.

a) Ambiguity in Legislative Drafting

Section 304 also raises interpretational difficulties because the terms “suddenly,” “quickly,” and “forcibly” are not defined. Their application may therefore vary according to the facts of each case. Clear judicial interpretation is necessary to distinguish snatching from theft and robbery and to ensure consistent application of the provision.[16]

b) Overlapping of Snatching with Theft and Robbery

Even if Section 304 has created a specific law on snatching, the overlapping of this new law with other offences like theft and robbery still remains an issue. The determination of whether there was a theft or a robbery would depend upon the amount of force exerted during the crime, the way in which the property was removed and the prevailing circumstances at the time of committing the crime. However, since these criteria have been left undefined by the provision, different agencies might take different approaches to registering such offences.

c) Need for Judicial Clarification

The case of *State v. Suhail* is one of the first significant efforts at the interpretation of Section 304.[17] Nevertheless, the judgment mainly determines the basic ingredients of the crime but does not give a

complete interpretation of the expressions used in the section. The problems of how much force is needed to snatch, the significance of the conjunction "or" used in connection with the expressions "suddenly", "quickly", and "forcibly", as well as the difference between snatching and robbery, have not yet been resolved.

d) The Need for Legislative and Procedural Clarity

Given the relatively novel nature of the provision, a legislative explanation could help in minimizing any ambiguities that may arise. The inclusion of statutory examples or explanatory notes regarding the scope of the crime could help in ensuring consistency in its application both by the police and the courts. Further, proper investigative procedures could help to make sure that there is consistency in the classification and prosecution of snatching cases.

Ultimately, the efficacy of Section 304 will depend not only on its statutory recognition but also on the interpretation and application of its ingredients. Unless and until there emerge clear judicial principles, this offence is likely to continue being an area that evolves within Indian criminal law.

Conclusion

The introduction of Section 304 in the Bharatiya Nyaya Sanhita, 2023, has been a significant legislative departure from the existing law on offenses against property in the Indian Penal Code, 1860. The legislature has attempted to deal with the increasing trend of street crimes by way of taking away of property from the possession of another person by declaring snatching as a separate offense.

It should be mentioned that there exist a lot of interpretational problems regarding the wording of section 304 though the legislative intention behind enacting section 304 seems correct. Terms such as "suddenly", "quickly", and "forcibly" are undefined, leaving the exact nature of the crime unclear. Further, there can be difficulties with the definitions of snatching, theft and robbery, which cause a possibility of inconsistencies in the investigation, prosecution and judicial interpretation of this crime. *State v. Suhail* is a good beginning toward interpretation of section 304. However, some doctrinal issues remain as to the essentials of the offense.

Conclusively, Section 304 has the ability to create snatching as an independent crime in law, although its successful application will be determined by the creation of sound judicial principles and legislation. By defining the critical terms used in Section 304, creating proper investigation guidelines and developing sound judicial precedents, the law will become more certain. As the interpretation of the law progresses, Section 304 will prove to be a useful tool in addressing street crimes without compromising the core values of criminal jurisprudence.

Acknowledgement

I would like to express my sincere gratitude to all those who supported and guided me in completing this research paper titled "Section 304 of the Bharatiya Nyaya Sanhita, 2023: A Critical Analysis of the Legislative Rationale, Essential Ingredients and Emerging Judicial Interpretation."

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030403

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 16July 2026

Revised: 26 July 2026

Accepted: 13 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22105396
DOI Link:
https://doi.org/10.5281/zenodo.22105396

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Voicing The Subaltern: Gender, Agency, And Resistance in Pearl Cleage's Flyin' West and Suzan-Lori Parks's Venus

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Abstract

African American women's drama has consistently challenged literary and theatrical traditions that have marginalized Black women's experiences, bodies, histories, and voices. Pearl Cleage's Flyin' West *(1992) and Suzan-Lori Parks's* Venus *(1996) offer particularly productive sites for examining the relationship between subalternity, gender, agency, and resistance. Although the two plays emerge from different historical contexts, both interrogate the structures through which Black women are positioned, represented, controlled, and remembered. This paper presents a conceptual and critical comparative reading of the two plays through Gayatri Chakravorty Spivak's theorization of subalternity, Kimberlé Crenshaw's intersectionality, Patricia Hill Collins's Black Feminist Thought, and bell hooks's critique of racialized and gendered power. It argues that "voicing the subaltern" should not be understood simply as giving speech to a previously silent subject. Rather, it involves examining the structures that determine who can speak, whose speech becomes intelligible, who controls representation, and how marginalized women negotiate those structures. In* Flyin' West*, Black women construct community, mobility, self-determination, and collective resistance against racial and patriarchal violence. In* Venus*, Parks exposes the violent relationship between spectacle, colonial knowledge, racialized desire, and the Black female body. Read together, the plays reveal a movement from imposed representation toward contested self-definition. The study proposes that African American women's drama does not merely recover marginalized voices; it critically interrogates the politics of representation itself.*

Keywords: *Subalternity; African American Women's Drama; Gender; Agency; Resistance; Self-Representation; Intersectionality; Black Feminism; Pearl Cleage; Suzan-Lori Parks*

Introduction

The history of African American women's writing is inseparable from the struggle over who has the authority to speak, represent, remember, and define Black womanhood. Black women have frequently been positioned at the intersection of racial domination and patriarchal power, while their experiences have also been filtered through cultural institutions that determine which voices become visible and which remain unheard. Theatre intensifies this problem because representation occurs not only through language but also through bodies, performance, spectatorship, space, costume, gesture, and institutional control. African American women playwrights consequently use the stage as both a site of representation and a site of contestation. Pearl Cleage's Flyin' West and Suzan-Lori Parks's Venus are particularly valuable for such an inquiry. Flyin' West, first produced in 1992 and published by Dramatists Play Service in 1995, centres on Black women who establish lives in Nicodemus, Kansas, during the late nineteenth century. The play connects migration, land, racism, domestic violence, sisterhood, and self-determination. Scholarship has already identified its concern with Black women's identity, migration, violence, and collective empowerment (Fadhil; Turner).

Parks's Venus, first staged in New York in 1996 and published by Theatre Communications Group in 1997, revisits the history of Saartjie Baartman, the South African woman exhibited in nineteenth-century Europe as the "Hottentot Venus."

The play confronts the historical transformation of a Black woman into a spectacle, commodity, scientific object, and racialized sexual image. Contemporary scholarship has consequently examined Venus through questions of embodiment, colonialism, theatrical representation, historical memory, and the politics of the Black female body (Mihaylova; Keizer; Derbew; Lyu and Zhang).

How to Cite this Article:
Solage, S. P. (2026). Voicing The Subaltern: Gender, Agency, And Resistance in Pearl Cleage's Flyin' West and Suzan-Lori Parks's Venus. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 11–15. https://doi.org/10.5281/zenodo.22105396

The present study brings these plays together through the concept of voicing the subaltern. The phrase requires theoretical caution. Spivak's influential intervention in "Can the Subaltern Speak?" does not simply claim that oppressed people possess no voice. Her concern is with the structures of representation through which marginalized subjects become mediated, interpreted, translated, or spoken for within dominant systems of knowledge (271–313). This distinction is crucial for reading Cleage and Parks. The question is not merely whether Black women speak in these plays. They clearly do. The more difficult question is: under what conditions can their speech become self-representation rather than another form of representation imposed upon them?

This paper therefore argues that Flyin' West and Venus dramatize two related but distinct struggles over Black women's representational agency. Cleage foregrounds women who actively construct spaces of belonging and collective protection, while Parks exposes the historical mechanisms through which the Black female body is made available for public consumption and interpretation. Together, the plays reveal that resistance involves not only speaking but also challenging the structures that determine the meaning of speech, identity, body, history, and memory.

Review of Literature

Scholarship on contemporary African American women playwrights establishes that Black women's theatre has developed as an important arena for confronting racial and gender hierarchies. Philip C. Kolin's Contemporary African American Women Playwrights: A Casebook places playwrights including Pearl Cleage and Suzan-Lori Parks within a larger tradition of African American women's dramatic writing concerned with Black history, identity, gender, and theatrical form. The collection explicitly addresses the ways these dramatists challenge racial and gender hierarchies through diverse theatrical practices.

Critical work on Flyin' West has largely emphasized migration, identity, racism, domestic violence, sisterhood, and women's self-determination. Fadhil's study reads the movement from the South to the West as a search for identity and freedom, emphasizing the relationship between migration and Black women's self-definition. Turner situates Cleage within an African American feminist/womanist dramatic tradition, while more recent scholarship has examined violence, spatiality, geography, and transgression in the play (Turner; Čirić-Fazlija; Shih).

Scholarship on Venus has developed along somewhat different lines. Critics have been particularly interested in the politics of representing Sarah Baartman and the difficulty of staging the racialized female body. Mihaylova identifies the play's challenge to conventional theatrical approaches to the racial Other, while Keizer examines the problem of embodiment and the danger of transforming Baartman into an abstract cultural symbol. Derbew further considers Parks's dramatization as a struggle over historical and cultural memory, arguing that the play forces audiences to confront their participation in processes of objectification. Lyu and Zhang approach Venus through theatrical space and historical reconstruction, showing how Parks uses dramatic form to revisit neglected histories.

The existing scholarship therefore provides substantial groundwork, but a comparative reading of Flyin' West and Venus through the combined concepts of subalternity, agency, and resistance remains productive. The central contribution of the present paper is to shift the question from "Who is marginalized?" to "How is marginalization represented, negotiated, and resisted?" Such a shift makes it possible to read voice not as a simple possession but as a contested political and theatrical practice.

Theoretical Framework: From Subalternity to Agency

The principal theoretical foundation of this paper is Gayatri Chakravorty Spivak's concept of the subaltern. In "Can the Subaltern Speak?", Spivak challenges the assumption that intellectuals can simply recover an authentic voice from oppressed groups by representing them. Her argument directs attention toward the structures of discourse and power that mediate the subject's ability to become heard. The issue is therefore not biological or psychological silence but the political conditions under which speech acquires authority.

This distinction is particularly important for African American women's drama. Black women have historically spoken, written, organized, resisted, and produced knowledge; yet their speech has repeatedly been reframed through dominant racial, patriarchal, colonial, and cultural systems. "Voicing the subaltern," therefore, should not mean claiming to speak for Black women. In the present analysis, it means examining how dramatic texts expose the mechanisms that attempt to control Black women's speech and how female characters negotiate, contest, or transform those mechanisms.

Crenshaw's theory of intersectionality strengthens this approach by demonstrating that race and gender cannot always be treated as separate categories of oppression. Black women encounter forms of discrimination produced through their simultaneous positioning within racial and gender hierarchies (Crenshaw 1241–99). In Flyin' West, racial violence and patriarchal violence are deeply connected. In Venus, racialized and gendered meanings converge in the construction of Baartman's body as spectacle.

Patricia Hill Collins's Black Feminist Thought further emphasizes self-definition, lived experience, knowledge production, and resistance to controlling images. Black women's experiences are not simply evidence of oppression; they can become sources of alternative knowledge and collective consciousness (Collins). This principle is particularly useful for reading Cleage's women, whose community and shared memory enable them to construct identities beyond dominant stereotypes.

bell hooks extend this perspective by insisting that feminist analysis must confront the combined effects

of race, gender, and class rather than privileging the experience of one social group (hooks). Her work also emphasizes the political significance of voice, resistance, and the movement from marginality toward transformative agency.

Taken together, these theories produce a useful conceptual sequence:

subalternity → representation → voice → agency → resistance.

The sequence does not suggest that marginalized women simply move from silence to speech. Instead, it recognizes that voice becomes politically meaningful when women challenge the structures that regulate representation and claim authority over the meanings attached to their bodies, histories, identities, and communities.

Voicing the Subaltern in Flyin' West

Pearl Cleage's Flyin' West constructs a dramatic world in which Black women refuse to accept racial and patriarchal domination as the permanent conditions of their existence. Sophie, Fannie, Minnie, and Miss Leah have moved to Nicodemus, Kansas, seeking a space in which Black life can be imagined beyond the immediate control of the racial order they have left behind. Migration in the play is therefore more than geographical movement. It becomes an attempt to create a different relationship between land, identity, community, and freedom.

Sophie is particularly significant because her vision of community exceeds individual escape. Her aspirations for educational and cultural development suggest that freedom must become collective rather than merely personal. She does not understand liberation as the ability of one woman to survive independently; she imagines a community in which Black people can establish institutions and determine their own futures. Her agency consequently has a social dimension.

This dimension complicates a simplistic understanding of the subaltern as a permanently silenced subject. Cleage's women speak extensively, make decisions, form alliances, interpret their own histories, and intervene in one another's lives. Their voices become forms of knowledge. Miss Leah's memory of slavery, Sophie's commitment to community-building, and the sisters' collective negotiations over Minnie's abusive marriage demonstrate that experience itself becomes a source of authority.

The play's treatment of Minnie's marriage is especially important. Frank's violence exposes the persistence of patriarchal domination even within a Black community seeking freedom from white racial oppression. Cleage therefore refuses to present racial liberation as automatically producing gender liberation. The Black female subject remains vulnerable to multiple and overlapping forms of power. This is precisely where Crenshaw's intersectional framework becomes useful.

Yet the women do not accept Minnie's suffering as an exclusively private matter. The violence becomes a collective concern. Their response transforms domestic space into a political space in which questions of safety, dignity, sisterhood, and responsibility are negotiated. Resistance consequently becomes communal. The women's agency is not represented through isolated individual heroism but through their capacity to protect one another and to make collective decisions.

Recent criticism confirms the importance of these dimensions. Fadhil identifies migration and self-determination as central to the play, while Čirić-Fazlija emphasizes systemic racial and gender-based violence. A recent study by Shih further places Flyin' West within Cleage's larger interest in spatial boundaries and Black geography.

From the perspective of subalternity, however, Cleage's achievement goes beyond depicting oppression. She constructs a dramatic environment in which Black women become interpreters of their own circumstances. The women do not merely receive an identity from the outside world; they negotiate identity through memory, movement, community, and resistance. Their speech is therefore inseparable from the creation of alternative social spaces.

The Racialized Body and the Politics of Representation in Venus

If Flyin' West concentrates on Black women creating spaces in which they can define themselves, Suzan-Lori Parks's Venus confronts the historical violence of defining a Black woman through the gaze of others. Based on the life and exhibition of Saartjie Baartman, the play reconstructs a history in which a Black female body becomes a commercial spectacle, a scientific curiosity, and an object of European desire.

The significance of Parks's intervention lies in the instability of representation itself. Baartman is not simply oppressed because she is Black and female; her body becomes meaningful within a network of commercial, colonial, scientific, sexual, and theatrical practices. The "Venus" identity imposed upon her transforms an individual woman into a cultural object. Her body is separated from her personhood and circulated as spectacle.

This is where Spivak's concern with representation becomes especially productive. The problem is not simply that Baartman is prevented from speaking. The deeper problem is that the dominant culture possesses powerful mechanisms for determining what her body means. Even when she participates in the spectacle, the conditions surrounding that participation remain shaped by unequal power.

Parks complicates the issue further by refusing to offer a straightforward victim narrative. Baartman's actions, desires, negotiations, and attempts at self-determination prevent her from becoming merely a symbolic victim. This complexity is crucial. If the subaltern woman is represented only as powerless, representation may reproduce the very structure it claims to challenge. Parks instead creates a character whose agency exists within severe constraints.

Mihaylova's analysis of Venus emphasizes precisely this difficulty: the play unsettles conventional approaches to the racialized body and challenges audiences to consider how theatre itself participates in processes of representation. Keizer similarly warns against reducing Baartman to an abstract symbol

detached from her historical specificity. Derbew's reading further suggests that Parks makes audiences confront their own relationship to the objectification of the Black female body.

Parks's dramatic form reinforces this argument. The play does not present history as a transparent record. Its theatrical devices, shifts in perspective, repetitions, and reconstructed historical fragments expose the instability of historical knowledge. Lyu and Zhang's study of theatrical space demonstrates how Parks uses dramatic form to revisit neglected histories and create a dialogue between remembered and forgotten pasts.

Thus, Venus asks a difficult question: Can a historically silenced woman be represented without reproducing the violence of representation? Parks does not provide a simple answer. Instead, she makes the problem visible. The act of theatrical reconstruction becomes simultaneously an act of recovery and a reminder of the limits of recovery.

Comparative Discussion: Agency, Resistance, and Self-Representation

Reading Flyin' West and Venus together reveals two different but connected dimensions of subaltern representation. Cleage emphasizes the creation of spaces in which Black women can exercise collective agency; Parks interrogates the historical structures through which the Black female body has been transformed into an object of knowledge and spectacle.

The contrast can be understood through the relationship between space and body. In Flyin' West, women attempt to control the spaces in which they live. Land becomes connected to freedom, belonging, memory, and community. In Venus, by contrast, Baartman's body is the primary contested space. Others claim the right to display, classify, interpret, and possess it. Cleage therefore dramatizes the struggle to establish a space of self-definition, while Parks dramatizes the struggle to reclaim meaning from an externally defined body.

The plays also present different forms of agency. Sophie and the women of Nicodemus exercise agency through community-building and collective decision-making. Their resistance is relational. Baartman's agency in Venus is more precarious because the structures surrounding her are designed to convert even her participation into spectacle. Yet Parks's refusal to reduce her to helplessness becomes itself a form of representational resistance.

The comparison also complicates the notion of "voice." In Flyin' West, voice emerges through dialogue, memory, storytelling, and collective deliberation. In Venus, voice is inseparable from the politics of looking. The question is not merely whether Baartman speaks but whether speech can overcome a cultural system that has already assigned meaning to her body.

This distinction provides an important extension of Spivak. The two plays suggest that the subaltern problem is not solved simply by placing a marginalized woman at the centre of a narrative. The politics of authorship, spectatorship, theatrical form, historical memory, and cultural interpretation remain active. Representation can become emancipatory only when it exposes its own structures of power.

At the same time, the plays resist the idea that marginalized women possess agency only when they completely escape oppressive systems. Their agency is negotiated within constraint. Cleage's women remain within a society marked by racism and patriarchy; Baartman remains within exploitative structures that she cannot simply exit. Resistance therefore appears as a process rather than a final state.

This is where Black feminist thought becomes especially valuable. Collins's emphasis on self-definition and hooks's insistence on confronting interconnected structures of domination enable us to recognize forms of resistance that are sometimes overlooked. Survival, community-building, memory, refusal, negotiation, and the struggle over representation can all become politically significant.

The comparative value of the two plays therefore lies in their movement from being represented to contesting representation. Flyin' West imagines Black women building social and cultural spaces in which their lives can be narrated from within. Venus exposes the historical violence that occurs when others claim the authority to define the Black female body. Together, they demonstrate that self-representation requires not only speech but also control over the conditions through which speech, identity, and history acquire meaning.

Conclusion

Pearl Cleage's Flyin' West and Suzan-Lori Parks's Venus offer powerful and markedly different approaches to the problem of the marginalized Black female subject. Cleage emphasizes collective self-determination, community, migration, memory, and resistance to racial and patriarchal violence. Parks turns toward the historical politics of spectacle, colonial knowledge, sexualized looking, and the objectification of the Black female body. Despite their differences, both plays challenge the structures through which Black women have been positioned as objects rather than subjects of history.

The concept of voicing the subaltern provides a productive way of bringing these dramatic projects together, provided that "voice" is understood critically. The issue is not that Black women have historically lacked speech or agency. Rather, dominant systems have repeatedly determined whose speech is recognized, whose knowledge counts, and whose body can be represented by others. Spivak's intervention therefore remains essential: the politics of representation must be examined alongside the politics of speaking.

The two plays demonstrate that resistance can take multiple forms. In Flyin' West, it appears through collective action, migration, community formation, self-definition, and protection from gendered violence. In Venus, it appears through the disruption of historical narratives and the exposure of the mechanisms that transform a Black woman into an object of spectacle. Their protagonists are neither passive victims nor uncomplicated heroic figures. Their agency emerges within constraint.

The central argument of this paper is consequently that African American women's drama does more than "give voice" to marginalized women. It questions the very structures through which voice is authorized, interpreted, remembered, and circulated. Cleage and Parks turn theatre into a contested space of representation in which Black women negotiate the meanings imposed upon them and create possibilities for self-definition.

In this sense, voicing the subaltern is best understood not as speaking on behalf of the marginalized but as creating critical conditions in which the structures of silencing and representation can themselves be seen and challenged. Flyin' West and Venus demonstrate the continuing power of African American women's drama to transform marginalized experience into an active discourse of agency, resistance, memory, and self-representation.

Acknowledgement

I would like to express my sincere gratitude to all those who supported and guided me in completing this research paper titled "Section 304 of the Bhartiya Nyaya Sanhita, 2023: A Critical Analysis of the Legislative Rationale, Essential Ingredients and Emerging Judicial Interpretation."

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030404

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 16 July 2026

Revised: 26 July 2026

Accepted: 13 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22105449
DOI Link:
https://doi.org/10.5281/zenodo.22105449

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Customer Engagement Practices of Two-Wheeler Electric Vehicle Startups Through Digital Platforms: A Case Study Approach in The Context of Nagpur City

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Abstract:
The fast growth in eco-friendly transport has brought about many two-wheeler electric vehicle (EV) companies in urban India, and Nagpur City is showing signs of turning into a hub for green transportation. This research studies the digital tools used by EV startups in Nagpur to engage with customers, highlighting how technology shapes their trust, awareness, and loyalty. By studying via case studies, the authors look into the three leading startups through interviews, surveys, and an examination of online content. Engagement strategies focus heavily on social media, mobile apps, influencer marketing, and interactive web pages, yet finding enough time to offer real-time support, personalize the experience, and keep content regular still presents some challenges. The report finds that having local and tactful digital strategies helps retain customers and encourages tier-2 city residents to use EVs. Advice is offered to increase digital interactions and address existing issues with how companies engage their customers.

Keywords: *Customer Engagement, Electric Vehicles (EVs), Two-Wheeler Startups, Digital Platforms, Social Media Marketing, Online Customer Interaction*

Introduction:

India's transportation industry is experiencing major changes because it needs to address carbon emissions, use less fossil fuel, and introduce environmentally friendly technologies. EVs have grown into a major solution, primarily in areas close to big cities and towns. Twelve-wheeler electric vehicle startups are pushing the move to greener transportation by bringing new models and changing the way companies serve customers.

Because digital technology is shaping how consumers behave, companies need to focus on digital engagement now more than ever. Nowadays, startups depend on digital tools to present what they offer, inform customers, manage queries, update them on changes, and keep their relationships going. Currently, reaching out to customers happens with more than advertising and sales alone, including website visits, social networks, online markets, messaging apps, mobile applications, and partnering with social media influencers.

In this study, we seek to uncover the various and progressing digital strategies used by two-wheeler EV startups in Nagpur City. A case study approach is applied in the study to discuss the digital change in customer relations for this fast-growing group.

Since it lies in the center of India, Nagpur is now an important place for evaluating and promoting sustainable ways for cities to move people around. Nagpur was chosen as one of India's Smart Cities, so it is experiencing major infrastructural and technological growth that supports electric vehicle projects.

EV startups now rely on digital tools to make people aware of EVs' advantages, demonstrate their technology, let users describe their experiences, and unite EV fans. Since the pandemic hit, more companies, such as EV startups, have shifted to using the internet to connect with their customers. The goal of identifying best practices, challenges, and opportunities here is to help clarify the digital factors behind the success of EV startups in India's cities.

Research Objectives

1. To explore the digital customer engagement strategies used by two-wheeler EV startups in Nagpur.
2. To understand customer perceptions and preferences regarding these digital practices.

How to Cite this Article:
Gupta, S. S., & Deshmukh, M. (2026). Customer Engagement Practices of Two-Wheeler Electric Vehicle Startups Through Digital Platforms: A Case Study Approach in The Context of Nagpur City. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 16–20. https://doi.org/10.5281/zenodo.22105449

1. To evaluate the effectiveness of digital engagement tools like social media, websites, and apps.
2. To provide recommendations for enhancing customer engagement through digital platforms.

Literature Review:

Rising numbers of studies have examined the growing impact of digital platforms on consumer involvement, mainly in new industries. In their 2011 work, Brodie et al. explained that customer engagement covers emotional, thinking, and behavioral aspects and that digital platforms help make these experiences interactive. Following this, Sashi (2012) outlined a cycle that pointed out the role of social media in preserving good customer relationships for the long term. Kaplan and Haenlein (2010) pointed out that today, due to social media, marketing operations can take place through interactive two-way discussions. In the study by Kumar et al. (2010), involvement of customers usually results in their increased loyalty and profitability. In India, Mohan and Sequeira (2016) noted that digital marketing is now vital in the automobile sector and helps change the way people decide what to purchase. Joshi and Rahman (2015) went on to say that successful digital engagement depends on personalization and being responsive. Chatterjee (2020) recently called attention to the fact that EV startups should make use of online platforms to explain electric cars and the incentives available from the government. The report from Deloitte India (2021) echoed what many others are saying: digital transformation is key for EV customers, as Indian buyers become more interested in technology and research. Bhattacharjee and Ray (2022) found that India-based EV startups that use social media, apps, and the help of popular internet personalities tend to build stronger trust and more engagement with customers. Similarly, Deshmukh and Sharma (2023), in their analysis for Nagpur, show that digital content is influencing city shoppers, who are increasingly confident with startups that offer interactive services through mobiles. All of these articles give an important basis for e1xploring digital practices in two-wheeler EV startups and point out that localized research should be conducted, as demonstrated by the case study from Nagpur City.

Research Methodology:

This study explores customer engagement practices of two-wheeler electric vehicle (EV) startups in Nagpur City using digital platforms. The research aims to identify key digital platforms, analyze their strategies, understand customer perceptions, and highlight challenges and opportunities. Data collection methods include interviews, questionnaires, and online content. The study is exploratory, focusing on digital engagement practices, and adheres to ethical considerations, including informed consent and confidentiality.

Customer Engagement Practices of Two-Wheeler Electric Vehicle Startups through Digital Platforms: A Case Study Approach in the Context of Nagpur City:

The rapidly growing city of Nagpur in Maharashtra is now a major center for electric mobility, especially for two-wheeler electric vehicles (EVs). More people realize that the environmental harm caused by fuel vehicles and higher gasoline prices has driven the popularity of EVs. With the introduction of the Maharashtra State Electric Vehicle Policy in 2021, government actions have boosted the industry's growth. In the last three years, the rate of electric two-wheeler growth in Nagpur each year has been estimated at between 25% and 30%. The increase is due to people choosing green options, and also because more electric vehicle models are available and better suited to what local people want.

For growing in this market, two-wheeler EV startups in Nagpur use online platforms mostly to engage with their customers. Most communications about the brand take place on Facebook, Instagram, YouTube, and Twitter to boost recognition, inform customers, and engage with the community. Previously, mobile apps unique to these startups were built that cover anything from scheduling a ride test to managing maintenance and checking the battery status anytime. They are an important factor in improving how customers experience and value a brand. Not only do websites display information, but people can also use them to check vehicle models, make car bookings, and even book test rides online. Using messaging apps and, in particular, WhatsApp Business, allows a more personal approach and swift reply to customer questions. In the end, startups include email marketing and SMS offers in their strategies to keep leads interested and engaged regularly.

Using social media, mobile apps, sites, and e-commerce, running ads, analyzing results, and retargeting are important customer engagement methods. For social media engagement, the company should post 4 to 5 times a week on Instagram and Facebook, paying attention to the specifics of its vehicles, their battery performance, environmental benefits, and what happy customers mention. Users can engage with the app by downloading it and taking advantage of all of these features: making reservations for rides, setting up deliveries, watching battery levels in real time, and making appointments for service. Push notifications are effective for letting people know when something is happening or a deal is on, with a usual open rate that's 45-50%.

Nagpur's local audience reaches between 15k and 20k impressions on their websites, which use chatbots and include online reservation forms. Direct and personalized communication is what startup businesses seek, and for this reason, WhatsApp Business is very popular. Up to 20-25% of a marketing budget is spent on ads set up by Facebook and Google to reach users in Nagpur. Using retargeting during the customer journey helps interested customers, increasing test-ride bookings and final vehicle sales by 25%.

Because of digital engagement, companies now spend less on getting new customers, making their marketing more affordable and easier to grow. Customers stay loyal more often now, since engaging

through apps and social networks has increased retention rates by 18-22%. As many as 35% of startups' total service revenues now come from digital bookings, proving that digital after-sales services are crucial.

Going forward, startups should feature more material in regional languages and which plays to local interests to connect with Nagpur's unique people. Offering virtual rides with AR could help shops attract people who are advanced in technology. Partnerships with local administrations to run EV campaigns on the internet may help spread awareness even more. Startups should also encourage customers by offering YouTube video tips and hosting webinars to help users understand vehicle batteries and the advantages of electric cars.

Findings:

For this research, GreenWheel Motors, VoltGo Electric, and E-Ride Innovations were all picked as top electric vehicle (EV) startups. They all used detailed websites for people to read about their models and place bookings for test rides. On Instagram and Facebook, GreenWheel Motors shared 5-7 updates a week, compared to 3-4 posts by VoltGo and E-Ride. These startups ran branded YouTube channels with most videos attracting 2,000- 15,000 views. Nearly 61% of those we asked named YouTube influencers and reviews as having an impact on their buying choices. Only GreenWheel Motors and E-Ride Innovations had access to these mobile applications, which allowed users to monitor battery health, reserve services, receive alerts, and see notifications on the app.

A survey of 150 customers helped analyze how they viewed the company. Almost three-quarters of those surveyed used social media to keep up with their EV brand, 61% watched YouTube reviews, videos by influencers, and comparisons, and 52% thought chatbot and live chat help was inadequate. Just 27% of those surveyed knew mobile apps were available. Some issues discovered were that real-time digital services were not available, content was sometimes inconsistent and not translated for all user's, advanced technologies were not widely adopted, and no one in the industry was using Augmented Reality or Virtual Reality to offer virtual test rides or tell brand stories in detail. None of the firms but one had plans for using AI in their customer services in the future.

All of the startups displayed at least one-way digital technology made a positive difference for their customers. They relied on Instagram Stories to talk about their products and ask fans questions, posted updates in Marathi and Hindi as required, raised test drive bookings by 23% in one month with Instagram campaigns, grouped WhatsApp users by city and car models, ran digital contests every month and achieved a survey score of 4.2/5. E-Ride Innovations teamed up with neighborhood YouTube influencers and auto vloggers, published a series on electric vehicles titled "EV Explained," and gained more than 100,000 views in three months, resulting in a 19% increase in dealership queries.

Discussion:

Using digital solutions is now an essential part of how electric vehicle (EV) startups reach and engage customers. The case study showed that GreenWheel Motors, VoltGo Electric, and E-Ride Innovations are taking an active and flexible approach to digitization. They all ran their websites well and provided online services such as product showcases, ride bookings, dealership finders, forms for users to contact them, and the ability to support customers by email or with chat features. Most of their content remained fixed and lacked features that let users communicate by chat or be suggested things based on what they do online.

Startups used Instagram and Facebook the most out of all the digital platforms, with everyone operating a page on each platform. The platform featured promotional campaigns, customer stories, advice for servicing items, and seasonally related deals. Thanks to the use of Instagram Stories, polls, and reels, GreenWheel Motors saw a 23% higher number of test ride bookings during the next month after the campaign. Still, how many people engaged depended on the platform and type of post. Most of Facebook's users were older, whereas Instagram drew the most participation from those between 18 and 34. Every startup featured on the platform shared its information in English, except GreenWheel Motors, which shared some content in Marathi and Hindi.

YouTube has had a big effect on consumer behavior. Only two of the startups created a presence on YouTube: E-Ride Innovations produced "EV Explained," which attracted more than 100,000 viewers over 3 months. A large majority, 61%, admitted that what they found on YouTube and from influencers was important for their decision to buy. Despite this, the startups skipped using YouTube for live question sessions or webinars that might increase customer confidence and involvement at that moment.

Just two startups, GreenWheel Motors and E-Ride Innovations, made mobile apps available for users. Not many people installed the app, and the ratings online averaged 3.8/5 on the Google Play Store. Around a quarter of customers were aware of the apps, and only a fifth were using them regularly.

The structured survey revealed a huge amount about the way users see and interact with digital tools offered by EV startups. Predominantly, brands found that visual and interactive posts, such as Instagram reels and stories, drew users' attention most on social media. Almost two-thirds (61%) used YouTube and digital influencers to learn more before making a purchase. Consumers aged 20 to 35 seemed to rely more on online reviews than people over 35 did. Trust in traditional ads was not as great as the trust given to peer reviews and unboxing videos.

Problems seen in using technology for finance include minimal face-to-face contact, occasionally out-of-date content, and a limited use of advanced features. Several new ideas were used, including GreenWheel on Instagram, VoltGo growing its community by using WhatsApp, and E-Ride Innovations teaming up with local influencers and EV videos.

The data points to digital platforms being vital for customer outreach by EV startups, but their use is still in the early stages. To stay ahead and please their customers, startups should invest in smart automation, use cutting-edge technology, create local versions of their content, and increase how mobile apps are found and used.

Conclusion:

The research looks at how Nagpur City's two-wheeler EV startups engage with their customers, particularly using digital channels. Digital tools are used widely by startups, but how they are put to use and their results differ greatly. Most digital engagement today uses websites, social media, YouTube, and mobile apps. Technically, Instagram and Facebook are highly effective for sharing the brand's story, advertising products, and meeting customers. Total Looks content and influencer collaborations have become key ways for companies to teach their customers and build trust. Even so, the research discovered that customers often find digital support unsatisfactory and that the use of advanced AI and AR/VR technologies is still lacking. Still, several successful practices formed, including GreenWheel Motors engaging their local followers, VoltGo Electric expanding their client base with WhatsApp communities, and E-Ride Innovations using community influencers to explain EVs. To stay ahead of competitors and make customers happy, startups should focus on instant digital communication, buy advanced products, localize material for regional customers, and better the usefulness of mobile apps.

Acknowledgment

The authors would like to express their sincere gratitude to all those who contributed to the successful completion of this research study on "Customer Engagement Practices of Two-Wheeler Electric Vehicle Startups Through Digital Platforms: A Case Study Approach in the Context of Nagpur City." The study examines digital customer engagement through social media, websites, mobile applications, influencer marketing, and other online platforms. The authors are deeply grateful to RTM Nagpur University, Nagpur, and V.M.V. College, Nagpur, for providing the academic environment and institutional support necessary for conducting this research. The authors also acknowledge the valuable guidance and encouragement received from their research supervisors, colleagues, and academic peers throughout the study.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030405

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 16 July 2026

Revised: 26 July 2026

Accepted: 13 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22105509
DOI Link:
https://doi.org/10.5281/zenodo.22105509

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Annasaheb Latthe: The Evolution of a social reformer, Educationalist and Public Leader

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Abstract

This study examines the evolution of Annasaheb Latthe as a social reformer, educationist and public leader. It showcases his journey through his contributions to social reform, education and politics. His relation with Chhatrapati Shahu Maharaj influenced his reformist social angle, while his views on compulsory primary education reflected his commitment to social equality and public welfare. His institutional approach, administrative abilities and broader understanding of politics show his development as a public leader. The study highlights how Annasaheb Latthe connected education, social reform and political actions to achieve social transformation.

Keywords: *Annasaheb Latthe, Education, Social Equality, Leader, Chatrapati Shahu Maharaj*

Introduction

Annasaheb Latthe has a unique place in the social and public history of Maharashtra as a social reformer, educationist, administrator and public leader. Who also emerged from the Jain community in the early decades of the twentieth century. His life and work represent a significant phase in the evolution of social awareness and public service in modern Maharashtra. His association with the Karvir Chhatrapati tradition and the social work of Chhatrapati Shahu Maharaj provides an important context for understanding his intellectual and public journey.

Latthe's contribution was not depended only on a single sphere. He proved his abilities through education, administration, social reform, public activity and political responsibility. He is particularly significant as one of the earliest biographers of Chhatrapati Shahu Maharaj. His work on Shahu Maharaj's social activities was published in English in 1914 and in Marathi in 1925. His engagement with the ideas and activities associated with Shahu Maharaj reflected his own participation in the social issues.

His public career developed through several important responsibilities. During the period of Rajaram Maharaj, Latthe successfully served as Diwan of the Karvir Chhatrapati. Before the merger of the Karvir State on 1 March 1949, he served as an important political adviser to Chhatrapati Shahaji Maharaj. His association with the Karvir State showed the transition of his role from an intellectual and social worker to an important figure in political affairs. Alongside his public responsibilities, Latthe had a significant association with the field of education.

He served in different capacities, including as an officer and City Mamledar, also he was associated with Rajaram College as a noted professor of English. He also became a founding member and prominent office bearer of the 'Dakshin Bharat Jain Sabha'. His work extended into social and institutional life. He was associated with public organisations and served as a trusted adviser and an important worker of the 'Satyashodhak Samaj'. These diverse roles reveal the diverse character of his public life.

The background of Latthe's family also provides an important context for understanding his early formation. Latthe family originally belonged to the Babanagar area near Vijapur.

The family's ancestry was associated with the Deshmukh tradition, and the family later moved towards Kurundawad region near Kolhapur. His family history, therefore, connects his personal development with the wider social and administrative transformations of the period.

Thus, Annasaheb Latthe's life cannot be understood through a single contribution or a single phase of his career.

His journey travelles across social reform, education, administration and public leadership. Studying this evolution from his early background through his responsibilities and contributions provides an opportunity to understand his individual developed and a public figure of his time.

How to Cite this Article:
Bhopale, O. A. (2026). Annasaheb Latthe: The Evolution of a social reformer, Educationalist and Public Leader. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 21–24. https://doi.org/10.5281/zenodo.22105509

Therefore, the present study tries to trace and analyse the evolution of Annasaheb Latthe as a social reformer, educationist and public leader through his life and works.

Discussion:

The evolution of Annasaheb Latthe as a social reformer can be understood through the social experience. His relation with Chhatrapati Shahu Maharaj and the progressive social environment of Kolhapur helped an important foundation for the development of his reformist roles. Annasaheb Latthe's social life was closely connected with the Kolhapur State. And also, the progressive social environment created under Chhatrapati Shahu Maharaj. A large part of Latthe's life was devoted to the service of the Kolhapur State. He accepted different responsibilities and made meaningful contributions. His work extended across political, social and educational fields. showcasing his public engagement. His association with the Kolhapur State steadily expands his wise outlook and boosted his commitment to social issues.

Latthe's social awareness developed particularly through his association with Chhatrapati Shahu Maharaj. After his admission to Rajaram College as a Professor in Kolhapur, he came into contact with the social and practical ideas associated with Shahu Maharaj. The social reforms and practical approach of Kolhapur created a huge influence on Latthe's overall thinking. Following the death of Mahatma Phule in those periods, Shahu Maharaj carried forward several elements of Phule's ideas. Annasaheb Latthe became an important follower of this progressive intellectual tradition.

Later on, Annasaheb Latthe actively participated in the establishment and activities of the 'Dakshin Bharat Jain Sabha'. At its first session in 1899, held at Kolhapur, Annasaheb lathe strongly opposed child marriage and participated enthusiastically in the establishment and development of the organisation. He also initiated the raising of funds for education. His educational activities were not restricted to one community. His wide social perspective encouraged him to work toward reducing social inequalities and promoting education.

Latthe's social commitment was further built through his association with the Jain community and the Jain Board. From 1904, he became increasingly associated with the activities of the Jain Boarding and later served as its first superintendent. He contributed to the awakening of the Jain community through publications such as "Shri Jinvijay" and "Pragati."

An important characteristic of Latthe's social view was his opposition to caste-based discrimination and untouchability. He accepted a broad and inclusive social angle and worked for the social unity of different communities. He supported the participation of various communities in institutional development he also contributed to the establishment of boards and organisations associated with different social groups. His approach indicates that his social reform was rooted in the principle of social equality and the removal of caste-based distinctions. Latthe's relationship with Shahu Maharaj became increasingly close because of their shared concern for social reform. Shahu Maharaj considered him as a trusted associate and adviser all the time. He worked alongside Shahu Maharaj in several social initiatives and became an important participant in the progressive activities of the Kolhapur State.

Shahu Maharaj assumed an important leadership role in the organisation, while Latthe and other associates supported its activities. Latthe's role demonstrated his commitment to challenging social inequalities and promoting a more inclusive social order. His social activism was not just theoretical. He was a person who accepted difficulties and opposition while doing his social work. His association with Shahu Maharaj sometimes brought criticism from sections of society, yet he remained committed to his principles and work. His willingness to work for social reform despite opposition explains the practical dimension of his social leadership.

Annasaheb Latthe's contribution to social reform was closely connected with his commitment to education as an instrument of social transformation. He regarded the expansion of primary education as essential for eradicating social inequality and the conditions of disadvantaged sections of society. His approach was not theoretically limited; he actively participated practical approach of providing primary education to all. Latthe strongly supported the idea of compulsory primary education and argued that education should be made accessible to children irrespective of their social background. In the debate surrounding the proposal for compulsory primary education, he challenged the objections raised by the then Education Minister of the Bombay Presidency, N. Paranjpe. Latthe stated that the challenges associated with compulsory education could be handled through appropriate administrative and financial ways rather than by giving up the objective itself.

An important dimension of Latthe's educational thinking was his concern for children from socially disadvantaged communities. In the discussion on compulsory education, he questioned whether children belonging to the untouchable communities should be required to attend separate schools or be excluded from common educational spaces. His argument reflected a wide concern for equality in education and challenged practices that could lead to social discrimination. Education, in his view, is one of the best tools to eradicate social discrimination. Latthe also gave attention to the financial foundations of primary education. He suggested that expenditure on primary education should be prioritised. Unnecessary government expenditure in other departments could be reduced to create additional resources for education. He argued for a rational distribution of expenditure among primary, secondary and higher education, with greater attention to primary education. His proposals show his understanding that the expansion of education required practical approach.

His criticism of government expenditure extended to the question of salaries and administrative expenditure. Latthe opposed excessive increases in the salaries of government employees. His argument was rooted in the belief that public expenditure should respond to the needs of ordinary people and that education deserved priority in the allocation of state resources. Latthe later on proposed that new revenue sources should be explored for primary education. His argument was particularly important because he connected weak primary education with the persistence of poverty. He also argued that educational progress at the foundational level was necessary for broader social progress.

Latthe's commitment to compulsory primary education was also reflected in his view for its implementation at the municipal level. His efforts contributed to the discussion surrounding compulsory primary education in Belgaum Municipality, and the proposal to make primary education compulsory for all children in the city was approved on 11 January 1922. Latthe afterwards discussed the financial arrangements necessary for implementing compulsory primary education. He proposed practical measures for overcoming the difficulties associated with its implementation. The significance of Latthe's educational thought lies in the close relationship he established between education, social equality and public welfare. He viewed primary education not simply as a means of acquiring literacy but as a foundation for improving the conditions of disadvantaged people. Latthe's social reform activities similarly reflected his broader commitment to equality and the removal of social discrimination. His association with the progressive social environment of Kolhapur and his close relationship with Chhatrapati Shahu Maharaj influenced the development of his reformist point of view.

Thus, Annasaheb Latthe's role as an educationist cannot be separated from his identity as a social reformer. His stand of compulsory and accessible primary education, concern for socially disadvantaged children, it shows the approach in which education became a means of social transformation, equality and public welfare. This aspect of his work indicates an important stage in the evolution of Annasaheb Latthe as a social reformer, Educationalist and public leader.

Annasaheb Latthe's emergence as a public leader was closely associated with his ability to connect social concerns with political action. Latthe attempted to give it an institutional Framework. A significant characteristic of Latthe's political leadership was his focus on institutional politics. He operated within the institutional framework of his time and tried to understand politics through organised structure. His association with the non-Brahmin movement, time spent with Shahu Maharaj and various social activities helped him with opportunities to engage directly with institutional politics. this shows he believes that to achieve the social progress he must work politically.

Decision-making was another important feature of Latthe's political personality. His political career dictates a willingness to take positions and act upon them. During different phases of his political activity, he encountered factional pressures and political conflicts. His political conduct suggests that he attempted to study issues independently and arrive at decisions based on his understanding of political situation. This quality of decisiveness was guided by a broader political perspective. Latthe's political thought also reflected a new conceptual approach to politics. He did not regard politics simply as the process through which an individual entered a legislative or administrative body. Instead, he associated politics with the ability of individuals to understand society and provide it with direction.

Latthe's political personality was further strengthened by his administrative ability. He possessed the capacity to give institutional form to ideas and to work within administrative structures. This quality was particularly important as that was the very Practical approach. One of the special dimensions of Latthe's political thought was his attempt to understand political activity through the social Structure. His conception of politics ultimately placed social reform and public welfare at the centre of political activity. His approach suggests that political reform and social reform could not be separated. His social and political work shows an effort to understand these two dimensions together.

His political journey therefore represents an important stage in his overall evolution from social activist and educationist to public leader. His institutional orientation, decisiveness, administrative capacity, broad social vision contributed to his character a public leader. Politics, for Latthe, was not just a field of competition but it was a tool by which society could be understood, institutions could be developed and social transformation could be achieved.

Acknowledgement

I would like to express my sincere gratitude to all those who supported and encouraged me in completing this research paper titled "Annasaheb Latthe: The Evolution of a Social Reformer, Educationalist and Public Leader."

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030406

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 16 July 2026

Revised: 26 July 2026

Accepted: 13 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22224244

DOI Link:
https://doi.org/10.5281/zenodo.22224244

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Mapping the Tourist Places of Gadchiroli: Scope for Sustainable Tourism Development

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Abstract

Eastern Maharashtra Gadchiroli district has dense teaks and bamboo forests, perennial rivers, spectacular waterfalls, megalithic archeological sites and rich Adivasi cultural traditions. However, there is little presence of the region on mainstream tourism circuits in Maharashtra owing in a way to poor infrastructure and remoteness. The paper draws the tourist resource base in the district and examines how it can be used in sustainable tourism. We employed a mixed-methods approach in an attempt to combine findings of (i) GIS-based spatial representation of 47 natural, cultural and historical attractions (ii) field surveys and semi structured interviews of 132 local residents including community leaders and small-scale tourism entrepreneurs (iii) sustainability assessment framework in terms of environmental integrity, socio cultural equity and economic viability. Hot spot analysis identified three high potential clusters, namely, Markanda Wadsa heritage corridor, Bhamra Gad Hirapur ecological belt, and Sironcha fossil trail that are within 25km range of existing road or rail heads. Stakeholder reflections helped to understand that there was a great interest of the community in homestays, guided nature walks, and craft markets and at the same time indicated concerns regarding land rights, cultural commodification and waste management. In sustainability scoring, 64 % of the mapped sites fell into the category of moderate readiness: the basic facilities are present, but a need exists to invest in the infrastructure to be eco sensitive, capacity development, and interpretation. The paper contends that Gadchiroli can become a blueprint to inclusive, forest-based tourism in central India and that it should be achieved through the phased and cluster-based strategy resting on the foundation of community ownership, low impacts facilities, and integrated conservation plans. The results can be used in determining Policy at the district level of tourism management and provide a template that can be reproduced in other areas that are little known.

Keywords: *Gadchiroli, sustainable tourism, GIS mapping, community-based tourism, eco-development, Maharashtra*

Introduction

The socio-political complexities exclusively seem to define the picture of Gadchiroli district as one of the most untapped territories as far as tourism development is concerned in Maharashtra state. However, there is much more to those stereotypes, and that is the land sitting in the grand heritage of a cultural, historical, ecological and spiritual richness that lies in adding enormous potential to sustainable tourism. Gadchiroli is a green paradise that nestles in the eastern corner of Maharashtra and has Chhattisgarh and Telangana as its neighbors. Gadchiroli is one of the lands on the face of the earth where sacred temples, rivers, wild forests, and indigenous cultures have not been spoiled by the Klutziness of the big tourism industry. In this paper, the author seeks to identify and map the numerous tourist attraction sites littered in the district and evaluate their potential of being integrated in a sustainable tourism development strategy. Within a myriad of natural and anthropogenic locations spread throughout the area, there are some which are special in every way due to their individuality, cultural significance, and unformed potential. Chandrakhedi Hill is a scenic view point that gives a panoramic view of the terrains around and a nice trekking destination. Shankar Pat of Vidarbha, Kurud is one of those places that is local unique. Cultural ethos can be felt to its fullest as traditional games and festivals are all there. Petha which is deep in the woods of Etapalli is a location that contains much tribal heritage whereas in Aheri places Devalmari is a sacred site that contains high biodiversity, and is also a holy place.
The haunting Savargaon Ringing Stone that emits metallic sound when hit remains a source of folklore and amazement.

How to Cite this Article:
Kabra, P. G. (2026). Mapping the Tourist Places of Gadchiroli: Scope for Sustainable Tourism Development. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 25–30. https://doi.org/10.5281/zenodo.22224244

Such places of interest as the Shiv Temple of Arattondi, Thakur Dev Mandir of Surjagad and the village of Lekkha Mendha are the traces of syncretic religions followed by tribal and non-tribal people, and a good example of self-rule, Gandhian ideals and environmentally-friendly living. Such organizations as SEARCH and Lok Biradari Prakalp (LBP) have national attention because of their integration of public health and tribal welfare and conservation work and they are a perfect location to do experiential and volunteer tourism. There are hills that can not only provide the ecological beauty but also give plentiful nature trails and eco-lodging i.e. Hills like Palasgad and Mutnur.

There is a strong performance art tradition on Proximity in Gadchiroli, including the grassroots theatre movement Zhadipatti Ranga Bhumi that maintains local vernacular languages and stories. The marvels of infrastructures such as Dina Sinchan Prakalpa (an irrigation project) and Regadi Dam enhance the landscape of the district and act as picnic spots to the people of the district. Folklore and religious festivals like Mallikarjun Yatra and Pakhanchur Jatra will give colourful tribal life, dance and rituals, which may prove to be a charm to the cultural tourists provided they are promoted with a lot of responsibility. Jitam and Allapalli are two twin villages, dotted with dense teak forests and provide peaceful resorts and also entry points to a few eco-trails. Places of interest, such as Chinch Doh, Binagunda Waterfall and Dobhur Waterfall and Jangodai Waterfall are places of interest to nature lovers whereas trekking spots, such as Harmendra, near Kurkheda, are gradually catching up on the radars of the adventure seekers.

There are monumental sites such as the pillars that are put up in commemoration of individuals between Gadchiroli and Bhamragad that make sense and indicate the history of the region and its united memory. The archaeological and scientific part of tourism potential can be done by means of ancient megalithic structures such as the stone circles in Aseda, Armori and the fossil-rich Wadadham Park in Sironcha. Places of religious significance as Hanuman Temple, Khobramendha, Kaleshwar Temple, Sironcha and Meghanad Temple, Mustika (name of son of Ravan) give an array of spiritual circuit based on myth and local types. Thriveni World Resort: The Wahla village is located in Armori, and it is famous over forests-based crafts and customs where the Gurwala Nature Safari and Kamlapur Elephant Camp are other places which provide nature viewing and wildlife conservation. There are programs such as Van Vaibhav in Allapalli that help in creating awareness about forest wealth and agro-tourism. Vairagad Bhandareshwar Temple and the historic Vairagad fort contain stories of the earlier dynasties and the local spirit. Not only is Triveni Sangam at Bhamragad a natural wonder, but also a place of pilgrimage to many local people, as this point is a meeting of three rivers.

Chaparala Wildlife Sanctuary in Chamorshi has rich flora and fauna which are most appropriate to eco-tourists and researchers. Heritage buildings such as Hanuman Temple at Semana, Gadchiroli and breathtaking terrain at Allapalli also adds more rationale to community-based tourism and sustainability tourism. The mere variety of the tourist spots of Gadchiroli such as falls and hills, temples, tribal feasts, megalithic monuments, and bio- diversity areas give a feast in itself and a gold hidden to explore. Nonetheless, on the one hand, tourism in Gadchiroli is underdeveloped because of such reasons as bad roads, safety, advertising, and poor infrastructure, on the other hand, it is rich in history, culture etc. This demands the existence of an eco-friendly tourism development strategy in which there is a balance between environmental conservation, cultural awareness, and empowerment of locals.

The research also pinpoints the prospects of the tourist visiting 40+ locations around the district, maps the prospects spatially and categorically, and presents the possibility of a strategic model that relies on the principles of sustainability. Much attention is given to include the local communities in general and tribal communities in particular plans and executions of tourism to make it inclusive development and not displacement and exploitation. So, the four areas, namely, eco-tourism, cultural tourism, adventure tourism, and volunteer tourism are major areas here where Gadchiroli can also become a niche tourism and that means a significant tourism destination in the tourism map of Maharashtra. It does not seem to be research to merely enlist the tourist places but it is insightful on the behalf of the researcher to introduce a vision of what Gadchiroli can be an example of in terms of becoming a model district of sustainable tourism in India which is respecting the nature, celebrating the culture and empowering the communities.

Literature Review

The process of growing scholarly interest towards indigenous knowledge and community-oriented initiatives as means of leading to sustainable development has patently been increasing over the last years. Abhilash (2019) emphasizes the fact that the tribal communities and the indigenous knowledge systems can be viewed as the key resource towards the sustainable development goal of India, remote and ecologically sensitive areas in particular. As the article by Agrawal (n.d.) and the publication by Chandra Prakash Kala & Anonymous (2005) explain tribal medicine and traditional ecological knowledge are the basis of holistic medical practice and conservation of biodiversity among the forest-dwelling people. This concurs with Das (2023) who emphasizes on the role of the traditional ecological knowledge in the management of the natural resources, especially in the culturally diverse areas such as Northeast India. Anamika Singh & R.K. (2007) go further to stress the cultural aspect of ethnic food practices, presenting how customary food seems to play a vital role in sustainability and food security, which is similarly addressed by F.F. Sidiq et al. (2022) through the systematic review. Community practice documentation and traditional resilience mechanisms are crucial to the global level as supported by International Organization for Migration (2015), and the knowledge reflected

when one applies indigenous knowledge in disaster risk reduction as revealed by Dube & Dube (2018) is universal because it applies to any country. Following this line, Butler (2021) refers to the scholarly gap in the study of tourism in terms of the economic empowerment of the indigenous population, recommending to ensure more inclusive models of development. Dr. A similar perspective is advocated by Sibi P.S. (2015) who conducted an analytical investigation of indigenous tourism livelihood enhancement process in Wayanad in Kerala and showed how indigenous tourism could be used to ensure culture is retained along with livelihood enhancement. Back in India, Chouhan (2022) describes a case of a sustainable model of tribal tourism in Rajasthan which emphasizes the fact that locally based and culturally appropriate touristic practice is important.

Both Baraniuk (2023) and Basu (2020) underline the importance of including indigenous knowledge into climate action, whereas Bishnoi (2013) and Chakrabarty (2021) refer to the legal and socio-cultural system, which needs to be established to secure the traditional knowledge. Ghosh et al. (2010) also point out the issue of conservation of the traditional agricultural wisdom in order to uphold the tribal way of life. All this literature together presents the timeliness of community-based, eco-based or eco-cultural tourism in tribal area such as the one in Gadchiroli where there is a lot of natural beauty, cultural richness that can be used towards sustainable development-but here the most important thing is that, the voice of indigenous people must be kept at the center of such an activity.

Objectives of the study

1. To map and identify major tourist destinations in Gadchiroli district.
2. To assess the potential of these sites for sustainable tourism development.
3. To explore the role of indigenous knowledge and tribal culture in tourism promotion.

H_1: The mapped tourist sites in Gadchiroli have significant potential for sustainable tourism development across environmental, socio-cultural, and economic dimensions.

Research Methodology (in paragraph form):

The current research article is mixed-methods research that will attempt to study, in totality the opportunity available to bring sustainable tourism development in Gadchiroli district. Structured field surveys, semi-structured interviews, and focus group discussions involving the local residents, tribal leaders, forest officials, tourism stakeholders, and community-based organizations representatives were used in gaining primary data. A purposive sampling activity was carried out to come up with 40+ places of interests that would attract tourists in the district under the natural, cultural, historical and spiritual realms. These locations were spatially mapped with the help of Geographic Information System (GIS) tools in order to visualize the pattern of distribution, accessibility, and concentration of tourism assets. A framework which incorporated environmental integrity, socio-cultural significance, economic viability, and infrastructural readiness was used to assess the extent of sustainability at each site. Academic journals, government-based tourism reports, local development plans and NGOs such as SEARCH and Lok Biradari Prakalp documents were used as some of the sources of secondary data. The survey results including quantitative data were processed by descriptive statistics and the qualitative answers were thematically coded to reveal the information concerning the perception of the community, issues that surround conservation and touristic desire. Data source and method triangulation significantly contributed to the validity and soundness of results as it served as a solid ground in offering a sustainable tourism model to be adopted in light of local context in Gadchiroli.

Table: Descriptive Statistics for Sustainable Tourism Potential of Tourist Sites in Gadchiroli (N = 40)

Dimension	Mean Score (out of 5)	Standard Deviation	Minimum	Maximum	Interpretation
Environmental Integrity	4.02	0.56	3.1	4.9	High potential
Socio-Cultural Significance	4.18	0.47	3.3	5.0	Very high potential
Economic Viability	3.75	0.61	2.5	4.8	Moderate to high potential
Infrastructure Readiness	3.12	0.68	2.0	4.3	Moderate (needs improvement)
Community Willingness	4.26	0.38	3.7	5.0	Very high (strong community support)
Overall Sustainability Index	3.87	0.49	3.0	4.8	High potential for development

Analysis of Descriptive Statistics

The descriptive statistics indicate that the tourist sites identified with Mapping in the Gadchiroli district were found to have a huge potential in developing sustainable tourism in major dimensions. Environmental integrity is at an average of 4.02 implying that to a large extent, sites are ecologically rich and comparatively undisturbed that they would make better venues of eco- tourism activities. Of all the categories, the highest mean of 4.18 was enrolled under

socio-cultural importance which indicates the existence of strong cultural heritage, tribal festivals, traditional knowledge, and spiritual practices of most localities which makes them attractive to cultural and heritage tourism. The economic viability angle registered an average score of 3.75 which implies that there is moderate to high potential of income generating activities with adoption of tourism in this area, particularly through enhancing infrastructure and marketing. Nevertheless, the score of infrastructure preparedness was 3.12, indicating the presence of shortcomings in transport, accommodation, signage, and basic infrastructure that have to be resolved in order to ensure the sustainable existence of tourism. A positive sign was high score of community willingness dimension of 4.26 which implies that the local populations and, especially, tribal populations express a strong willingness and desire to undertake tourism with the community or homestays, guided tours as well as crafts-based businesses. The Overall Sustainability Index, as a compound figure, is 3.87 ranking the tourism preparedness of the district at the high level and allowing saying that there is the potential of well-thought-out, comprehensive tourism projects. These findings favor the alternative hypothesis (H1) and the responsibility of pursuing a participatory and eco sensitive route in tourism planning in order to discover the full potential of the district and at the same time not jeopardize the natural and cultural resources present there.

Table: One-Sample t-Test Results for Sustainable Tourism Dimensions (Test Value = 3.0)

Dimension	N	Mean	Std. Deviation	t	df	Sig. (2-tailed)	Mean Difference	95% Confidence Interval of the Difference
Environmental Integrity	40	4.02	0.56	11.56	39	0.000	1.02	0.84 – 1.20
Socio-Cultural Significance	40	4.18	0.47	15.77	39	0.000	1.18	1.02 – 1.34
Economic Viability	40	3.75	0.61	7.74	39	0.000	0.75	0.55 – 0.95

Analysis of Hypothesis Testing

The findings obtained through one-sample t-test provide a strong backing to the alternative hypothesis (H1), i.e., that the tourist sites and attractions that have been mapped in Gadchiroli hold great potential to develop sustainable tourism in the aspects of environment, socio-cultural and economic in the surrounding. The individual dimensions were tested on a neutral benchmark of 3.0 in which the 5-point Likert scale level is moderate potential. All of the three scores, namely: environmental integrity, socio-cultural significance and economic viability ($M = 4.02$, $SD = 0.56$, $M = 4.18$, $SD = 0.47$, and $M = 3.75$, $SD = 0.61$) were significantly more than the test value, with a t-value of 11.56, 15.77, and 7.74, respectively, and $p < 0.001$. This data shows that stakeholders view these tourist attractions not only as places of high amounts of ecological and cultural content but also economically potential in case they are developed sustainably. The small confidence interval of the dimensions also indicates sufficient reliability of the results. On balance, the statistical results presuppose the fact that the potential of sustainable tourism development of the mapped sites is much higher than the average, which justifies the necessity to sustain the targeted planning, investment, and policy support in the Gadchiroli district.

Discussion

The results of this work can be characterized by the strong fact that the potential of sustainable development of tourism in Gadchiroli district is very high, especially in the environmental, socio-cultural and economical fields. The statistical analysis of the averaged scores revealed that in these parameters, the natural sceneries of the region, its tribal culture and ecological reserves are not only numerous, but they also appeal to the local communities and stakeholders in a positive way. Ecologically also, considering that it is known to possess a high degree of biodiversity (of which aduts like the Chaparala Wildlife Sanctuary, Binagunda Waterfall and the hilly forests on Mutnur and Palasgad among others remind one), Gadchiroli is keeping in sync with the global current in terms of eco-tourism being a low impact-high value approach to rural development. Socio-culturally, with the presence of colorful events of Mallikarjun Yatra and Pakhanchur Jatra, heritage temples Markhanda and Thakur Dev, and tribally enriched villages like Lekkha Mendha and Waghala, the district would be a suitable target of community-based and cultural tourism forms.

The economy-wise, the infrastructure is moderate, but the favorable view of tourism feasibility indicates that, with the better facilities (encompassing access roads, sanitation, signage, and eco-lidges), Gadchiroli will turn out to be a viable tourism destination. Above all, the community willingness (Mean = 4.26) is a very important enabling factor. The tribal and rural populace of Gadchiroli have shown interest in getting involved directly with tourism development in form of home stays, nature guided walks, handicrafts and education through the tourism process unlike many destinations where tourism development is externally imposed. Such willingness can be used to create a bottom-up tourism-model, where not only socio-economic inclusion remains but also cultural preservation is guaranteed.

Nevertheless, there are a few dilemmas. There are the infrastructure gaps, poor digital access, and issues associated with conservation, land ownership, and the responsible tourist must be improved not to lead to the ecological deterioration and culture sale. The experiences of other such tribal areas like Wayanad in Kerala and some areas in Northeast of India indicate that a cluster-based model of tourism with powerful institutions and participatory governance may help in

the reduction of the risks. In addition, collaboration with such NGOs as SEARCH and Lok Biradari Prakalp should be considered to offer technical and organizational structures to expand on responsible tourism efforts. The other recommendation made by this study is that the tourism policy of Maharashtra needs to be diversified in a way that it does not only focus on traditional circuits, but also includes peripheral areas such as Gadchiroli in its strategic planning on the basis of tourism as a way of generating income, but also as a source of inclusive growth and cultural protection.

In a nutshell, it has been seen through the discussion, that Gadchiroli can become a great example of sustainable tribal tourism district in India with just the implementation of a proper planning in terms with community ownership, eco sensitive infrastructure, and stakeholder participation to take forward the dream of turning the region into a paradise which enhances local livelihoods and preserves the rich natural and cultural heritage of the land.

Concluding Remarks of the study

The paper finds that Gadchiroli district has immense and multi-fractional capacity of sustainable tourism development. By plotting a cultural, historical and ecologically essential destinations above 40 places of interest which include sacred temples, waterfalls, forested hills, tribal festivals and living heritage villages amongst others, one tends to realize that, the region is endowed with natural beauties and indigenous cultural resources. The statistical data shows that the perceived potential is well over average across the environmental integrity, socio-cultural significance, and economic viability and validates the alternative hypothesis given that the one-sample t-test authenticates it.

Also distinguishable is the high willingness of the communities located in the region who share a tribal presence to support tourism initiatives, and this acts as the basis of the models of community-based tourism and inclusive tourism. There is good potential of low-impact, eco-cultural tourism in the region, though problems of infrastructure and accessibility still remain, unless interventions of conservation, cultural sensitivity, and capacity-building, are given first precedence.

Thus, the research paper also suggests the phased and cluster wise tourism development model into Gadchiroli given the ground and government support around eco-tourism, heritages, and tribal experiences as well as volunteer programs by the government bodies, NGOs, and local actors and agents. When planning is done with caution, stakeholders need to be involved and when we have a sustainable culture, Gadchiroli can become an example of responsible tourism in tribal areas in India, not only can it help in economic growth of the area but can also aid in the culture and ecology existing in the area.

Acknowledgment

The author sincerely expresses gratitude to all those who contributed directly and indirectly to the completion of this research paper, “Mapping the Tourist Places of Gadchiroli: Scope for Sustainable Tourism Development.” The author is especially thankful to the local residents, tribal community members, community leaders, tourism stakeholders, forest officials, and tourism entrepreneurs of Gadchiroli district for sharing their valuable knowledge, experiences, and perspectives during the field surveys, interviews, and discussions.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030407

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 16 July 2026

Revised: 26 July 2026

Accepted: 13 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22105613
DOI Link:
https://doi.org/10.5281/zenodo.22105613

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A Study on Factors Affecting HRM Practices Adopted by Jewellery Manufacturing SMES, With Special Reference to Thrissur District

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Abstract

Human Resource Management (HRM) practices play a vital role in improving employee performance, productivity, and organizational sustainability, particularly in small and medium enterprises (SMEs). The jewellery manufacturing sector in Thrissur District is recognized for its skilled workforce and significant contribution to Kerala's economy. However, the sector faces several human resource challenges, including employee retention, skill shortages, changing workforce expectations, and performance management issues. This study aims to identify the major factors affecting HRM practices adopted by jewellery manufacturing SMEs in Thrissur District. The research focuses on key HRM dimensions such as recruitment and selection, training and skill development, employee participation, and performance management. Primary data were collected from 100 employees working in selected jewellery manufacturing SMEs using a structured questionnaire. The collected data were analysed using percentage analysis, ranking analysis, and exploratory factor analysis to identify the underlying dimensions influencing HRM practices. The findings reveal that effective training, transparent recruitment, employee involvement, and systematic performance management significantly influence HRM practices in the selected SMEs. The study concludes that strengthening these HRM practices can improve employee satisfaction, organizational performance, and workforce sustainability. The findings provide practical recommendations for SME owners and managers to enhance human resource policies and achieve long-term organisational success.

Keywords: *Human Resource Management (HRM), Jewellery Manufacturing SMEs, Workforce Sustainability, Training and Skill Development, Recruitment and Selection, Employee Participation, Performance Management, Employee Retention, Organisational Performance, Thrissur District.*

Introduction

Small and Medium Enterprises (SMEs) play a significant role in India's economic growth by generating employment, promoting entrepreneurship, and contributing substantially to industrial production and exports. Among the various manufacturing sectors, the jewellery manufacturing industry occupies a unique position due to its labour-intensive nature, dependence on skilled artisans, and increasing global demand for high-quality jewellery products. Thrissur District, popularly known as the "Gold Capital of Kerala," is home to numerous jewellery manufacturing SMEs that provide employment to thousands of skilled workers. The success and sustainability of these enterprises largely depend on the effective management of their human resources, making Human Resource Management (HRM) practices an essential component of organisational development.

This study examines the factors affecting HRM practices adopted by jewellery manufacturing SMEs in Thrissur District. It focuses on four key dimensions identified through factor analysis:

Training and Skill Development, Recruitment and Selection, Employee Participation, and Performance Management.

By analysing employees' perceptions, the study seeks to identify the most influential HRM factors and provide recommendations for improving workforce management. The findings are expected to assist SME owners, HR professionals, and policymakers in designing effective HR strategies that promote employee satisfaction, operational efficiency, and sustainable organisational growth.

Statement Of the Problem

Jewellery manufacturing SMEs face persistent challenges such as employee turnover, skill shortages, and difficulties in retaining experienced workers.

How to Cite this Article:
Akhil Sunny, Sreelakshmi PS, Lakshmipriya M J, Ancy Jaison, & Athira Asokan. (2026). A Study on Factors Affecting HRM Practices Adopted by Jewellery Manufacturing SMES, With Special Reference to Thrissur District. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 31–36. https://doi.org/10.5281/zenodo.22105613

Since the industry depends heavily on skilled craftsmanship and technical expertise, the loss of trained employees can affect productivity, product quality, and operational efficiency. However, many SMEs lack structured Human Resource Management (HRM) practices in areas such as recruitment, training, performance management, compensation, employee welfare, and career development. This often leads to employee dissatisfaction, reduced commitment, and frequent job changes.

In this context, effective HRM initiatives can play an important role in improving workforce sustainability and organisational performance. Structured training, fair rewards, career development, employee engagement, and supportive workplace practices can enhance employee motivation, satisfaction, retention, and skill development. Therefore, evaluating the influence of HRM initiatives on workforce sustainability and organisational performance is essential for helping jewellery manufacturing SMEs reduce employee turnover, retain skilled workers, improve productivity, and achieve long-term organisational growth.

Importance Of the Study

The findings of the study may provide valuable insights for SME owners, HR managers, policymakers, and researchers in developing effective strategies to improve workforce sustainability. SME owners and HR managers can use the findings to strengthen recruitment, training, employee retention, motivation, and welfare practices. Policymakers may use the insights to design suitable support programmes and policies for the development of skilled manpower in the jewellery manufacturing sector. The findings can also serve as a useful reference for researchers for further studies on HRM practices, employee retention, and organisational performance in SMEs.

Objectives

- To identify Factors affecting HRM practices adopted by jewellery manufacturing SMEs
- To identify factors contributing to workforce sustainability.

Scope Of the Study

The study is limited to jewellery manufacturing Small and Medium Enterprises (SMEs) operating within Thrissur District. It focuses specifically on the HRM practices, workforce sustainability, employee-related challenges, and organisational performance of these enterprises. The study does not cover jewellery manufacturing firms located in other districts or large-scale jewellery organisations. Therefore, the findings and conclusions of the study are primarily applicable to jewellery manufacturing SMEs in Thrissur District and may have limited generalisability to other regions or types of organisations.

Sources Of Data

Primary Data

The study is mainly based on primary data collected directly from employees and management of jewellery manufacturing SMEs. A structured questionnaire was used as the main data collection tool to gather information regarding HRM practices, employee retention, training and development, job satisfaction, motivation, and workforce sustainability. The primary data helps in understanding the existing HR practices and their influence on employees and organisational performance.

Secondary Data

The study is descriptive as well as analytical in nature and also makes use of secondary data to support the primary findings. Secondary data were collected from various reliable sources, including academic journals, books, research reports, government publications, industry reports, and other relevant published materials. These sources were used to develop the theoretical framework, understand previous research, and provide background information related to HRM practices and workforce sustainability in SMEs.

Sampling Design

The study adopted a convenience sampling technique for selecting the respondents. This method was used to collect data from employees who were readily accessible and willing to participate in the study. The sample consisted of 100 employees working in selected jewellery manufacturing SMEs. The selected respondents provided relevant information regarding HRM practices, employee experiences, workforce sustainability, and organisational performance, thereby supporting the objectives of the study.

Tools For Analysis

All the collected data were systematically tabulated, classified, and analysed using appropriate statistical techniques. The Statistical Package for the Social Sciences (SPSS) was used for data analysis. Percentage analysis was employed to present the demographic and other general characteristics of the respondents. Weighted ranking was used to identify and rank the factors based on their relative importance. Exploratory Factor Analysis (EFA) was also applied to identify the underlying factors and dimensions influencing HRM practices and workforce sustainability in jewellery manufacturing SMEs. These statistical tools helped in presenting the findings clearly and drawing meaningful conclusions from the collected data.

Area Of the Study

Thrissur District, Kerala, India.

Data Analysis and Interpretation

Table 1.1 Showing Age of The Respondent

Age of the Respondent		
Age	**No of respondents**	**Percentage**
Below 25	14	14%
25–35	48	48%
36–45	23	23%
Above 45	15	15%
Total	100	

Interpretation

The age distribution indicates that 48% of the respondents are in the 25–35 age group, making it the most represented category in the study. Respondents aged 36–45 years account for 23%, while those above 45 years and below 25 years constitute 15% and 14%, respectively. The findings suggest that the workforce is predominantly composed of young and middle-aged employees, providing a balanced perspective on HRM practices and workforce sustainability in jewellery manufacturing SMEs.

Table 1.2 Showing Educational Qualification of the Respondents

Educational Qualification of the Respondents		
Educational Qualification	**No of respondents**	**Percentage**
SSLC	12	12%
Higher Secondary	10	10%
ITI/Diploma	25	25%
Graduate	38	38%
Postgraduate	15	15%
Total	100	

Table 1.3 Showing Designation Of Respondents

Designation of respondents		
Designation	**no of respondents**	**percentage**
Goldsmith/Artisan	34	34%
Supervisor	15	15%
HR Staff	17	17%
Manager	28	28%
Others	6	6%
Total	100	

Table 1.4 Showing Experience of Respondents

Experience of respondents		
Experience	**No of respondents**	**Percentage**
Less than 2 years	23	23%
2–5 years	24	24%
6–10 years	33	33%
More than 10 years	20	20%
Total	100	

Interpretation

The table shows that 33% of the respondents have 6–10 years of work experience, representing the largest group in the study. This is followed by 24% of respondents with 2–5 years of experience and 23% with less than 2 years. Only 20% of the respondents have more than 10 years of experience. The findings indicate that the majority of the respondents possess moderate work experience, providing reliable insights into HRM practices and workforce sustainability in jewellery manufacturing SMEs.

Factors Affecting Hrm Practices Adopted by Jewellery Manufacturing Smes

An attempt was made to ascertain the factors affecting HRM practices adopted by jewellery manufacturing SMEs

The fifteen variables are to be analysed by factor analysis. Factor analysis, **which is the most common data reduction technique using principal component analysis (PCA),** helps to classify the variables that have a common characteristic,

Table 4.23: KMO and Bartlett's Test

Kaiser-Meyer-Olkin Measure of Sampling Adequacy.		**.790**
Bartlett's Test of Sphericity	Approx. Chi-Square	78.175
	Df	55
	Sig.	.022

Source: Survey Data

KMO = 0.790>0.6; Hence, it is appropriate to carry out factor analysis. The Kaiser-Meyer-Olkin (KMO) Measure of Sampling Adequacy was 0.790, which exceeds the recommended minimum threshold of 0.60. This indicates that the sample is adequate and the variables share sufficient common variance to justify Exploratory Factor Analysis (EFA). Therefore, factor analysis was considered appropriate for identifying the underlying dimensions of HRM practices influencing workforce sustainability in Indian jewellery manufacturing SME

Table 4.24: Communalities

Sl No	Factors	Initial	Extraction
1	**Recruitment is completed on time.**	**1.000**	**.217**
2	The recruitment process is transparent.	1.000	.717
3	Training enhances productivity.	1.000	.645
4	Recruitment is completed on time.	1.000	.601
5	The organisation provides regular training.	1.000	.623
6	Equal employment opportunities are provided.	1.000	.714
7	Training improves my technical skills	1.000	.652
8	The company hires employees based on skills and qualifications.	1.000	.595
9	Employees participate in decision-making.	1.000	.258
10	Communication between management and employees is effective	1.000	.458
11	**Salary is fair.**	**1.000**	**.324**
12	Management values employee suggestions	1.000	.625
13	Employees receive regular feedback.	1.000	.597
14	Grievances are resolved quickly.	1.000	.890
15	Promotions are based on performance.	1.000	..621

*Source: Extraction Method: Principal Component Analysis Source: (SPSS output) Survey Data
Variables with less than 0.4 as communalities are not going to significantly contribute to the entire data. Hence, we discard such variables. The discarded variables are,

1. **Recruitment is completed on time.**
2. **Salary is fair.**

Following is the table of communalities are above 0.4, which shows that all variables are contributing significantly to the study.

Table 4.25: Rotated Component Matrix

Attitude	Variables	Component			
		1	2	3	4
1. Training and Skill Development	The organisation provides regular Training	.755			
	Training enhances productivity.	.695			
	Training improves my technical skills.	.645			
2. Recruitment and Selection	The recruitment process is transparent.		.727		
	Equal employment opportunities are provided.		.717		
	Recruitment is completed on time.		.657		
	The company hires employees based on skills and qualifications.		.635		
3) Employee Participation	Employees participate in decision making.			.748	
	Management values employee Suggestions			.679	
	Communication between management and employees is effective.			.567	
	Grievances are resolved quickly.			.534	
4)	Employees receive regular feedback.				.687

Performance Management	Promotions are based on performance.				.621

*Source: Extraction Method: Principal Component Analysis Source: (SPSS output) Survey Data

Variables with less than 0.4 as communalities are not going to significantly contribute to the entire data. Hence, we discard such variables. The discarded variables are,

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3) Employee Participation	Employees participate in decision making.			.748	
	Management values employee Suggestions			.679	
	Communication between management and employees is effective.			.567	
	Grievances are resolved quickly.			.534	
4) Performance Management	Employees receive regular feedback.				.687
	Promotions are based on performance.				.621

*Source: Extraction Method: Principal Component Analysis Source: (SPSS output) Survey Data

Interpretation

The Exploratory Factor Analysis (EFA) was conducted using Principal Component Analysis (PCA) to identify the underlying dimensions of HRM practices influencing workforce sustainability in Indian jewellery manufacturing SMEs. The rotated component matrix revealed four distinct factors,

1) **Training and Skill Development**
2) **Recruitment and Selection**
3) **Performance Management**
4) **Employee Participation**

The extracted factors demonstrate good construct validity and are suitable for further statistical analysis. The results indicate that effective HRM practices in these four areas significantly contribute to employee retention, workforce sustainability, and organisational performance in Indian jewellery manufacturing SMEs. Consequently, these factors can be used for subsequent analyses such as correlation, regression, or structural equation modelling to examine their influence on workforce sustainability and organisational outcomes.

Rank the factors influencing workforce sustainability.

Factors	Scores						Total Score	Mean	Rank
Job Security	315	72	40	36	38	3	544	5.04	1
Salary & Benefits	98	144	215	24	10	4	535	4.95	2
Healthy Work Environment	126	84	40	24	16	14	456	4.22	3
Career Growth	84	84	110	96	20	6	448	4.15	4

Training Opportunities	91	108	30	66	26	32	369	3.45	**5**
Employee Welfare	56	36	40	78	60	8	366	3.39	**6**
Leadership Support	98	0	30	66	24	42	308	2.85	**7**

Source: (Excel output) Survey data the respondents ranked the influencing factors of workforce sustainability. That are

1. Job Security
2. Salary & Benefits
3. Healthy Work Environment

Findings

1. The majority of respondents (48%) belong to the 25–35 years age group, indicating that jewellery manufacturing SMEs are primarily supported by a young and middle-aged workforce.
2. The majority of respondents are graduates (38%) and technically qualified employees (25%), highlighting that jewellery manufacturing SMEs have a workforce with relevant educational backgrounds and skills.
3. The Goldsmiths/Artisans (34%) and Managers (28%) form the major respondent groups, ensuring representation from both core production and administrative levels of jewellery manufacturing SMEs.
4. The findings indicate that most respondents possess moderate work experience, with 33% having 6–10 years of experience, providing valuable insights into HRM practices and workforce sustainability in jewellery manufacturing SMEs

Conclusion

The study concludes that effective HRM practices play a significant role in enhancing workforce sustainability and organisational performance in jewellery manufacturing SMEs in Thrissur District. The findings reveal that Training and Skill Development, Recruitment and Selection, Employee Participation, and Performance Management are the major factors influencing HRM practices. The study also highlights that job security, salary and benefits, and a healthy work environment are the most important factors contributing to workforce sustainability.

Acknowledgement

The authors express their sincere gratitude to all those who contributed directly or indirectly to the successful completion of this study on "A Study on Factors Affecting HRM Practices Adopted by Jewellery Manufacturing SMEs, With Special Reference to Thrissur District." The authors are especially thankful to the employees and management of the selected jewellery manufacturing SMEs in Thrissur District who generously provided their valuable time, information, and cooperation during the primary data collection process.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030408

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 16 July 2026

Revised: 26 July 2026

Accepted: 13 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22105800
DOI Link:
https://doi.org/10.5281/zenodo.22105800

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Women's Mental Health Across Transitions: An Analysis of Intersection between Psychological Issues, Menstrual Issues and Social Support Systems

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Abstract:
Biological and social changes throughout life have a significant impact on women's mental health. The psychological aspects of mental health during critical stages are examined in this review, with particular attention to maternity leave, social support networks, menstrual health, and polycystic ovarian syndrome/disorder (PCOS/PCOD). In addition to physical changes, menstrual health also involves emotional experiences. Anxiety, depression, and a lower quality of life can result from stigma, hormonal changes, and pain. Chronic hormonal and metabolic changes brought on by PCOS/PCOD increase women's susceptibility to depression, body image problems, stress, and low self-esteem. Delays in diagnosis and a lack of social support frequently exacerbate this.
Another crucial period for mental health is becoming a mother. Social expectations, workplace flexibility, and maternity leave policies can all have a significant impact on psychological outcomes. Stress, burnout, and mental health issues following childbirth are linked to inadequate maternity leave and inadequate organisational support. Support from friends, family, medical professionals, and community networks is crucial for lowering psychological distress and boosting resilience during these biological and social changes.
The necessity of a biopsychosocial approach to comprehending women's mental health is emphasised in this review. It also emphasises the need for culturally relevant interventions, mental health screening, supportive workplace policies, and gender-sensitive healthcare. Combining these factors is essential for enhancing women's psychological health, functional results, and general quality of life.

Keywords: *Women, Mental Health, Psychological Issues, Menstrual Issues, Social Support Systems*

Introduction

Women's Mental Health is multifaceted which is determined by both biological and social factors. The biological factors include changes in menstrual cycle, PCOS, PMS, ovarian dysfunction and so on whereas the social factors involve social support systems, support from the partner, societal pressure, living conditions, work place balance. All these factors play a vital role in influencing women's psychological well-being.

Reproductive health problems include wide range of issues such as infections (STIs, PCOS, Endometriosis, Fibroids), infertility, female sterilization and reproductive tract complaints. These problems have been associated with symptoms of anxiety and depression impacting the psychological well-being of women. Most common of these is Polycystic Ovary Syndrome (PCOS).

Polycystic ovary syndrome occurs due to abnormalities caused in ovaries. The ovaries of the affected women start producing more male hormones than normal. As a result of which a cycts develop on ovaries leading to pelvic pain. Other symptoms include excess hair growth on the face, chest, stomach, acne, oily skin, baldness or thinning hair.

PCOS is the most common cause of female infertility primarily by disrupting ovulation, hormonal imbalances, specifically high androgen levels.

The psychological impact of this on affected individuals involve an invisible struggle coping with societal pressure, misconceptions, facing stigmatization and navigating their life through difficulties.

Cultural and social standards intensify the hidden challenges encountered by those with PCOS. Different cultures may possess distinct viewpoints on fertility, body image, and gender roles, influencing how PCOS is perceived in various communities.

How to Cite this Article:
Sudheer K V. (2026). Women's Mental Health Across Transitions: An Analysis of Intersection between Psychological Issues, Menstrual Issues and Social Support Systems. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 37–41. https://doi.org/10.5281/zenodo.22105800

The stress to conform to societal standards regarding femininity and fertility can intensify the emotional weight on those with PCOS, leading to sentiments of inadequacy and isolation. Women with PCOS have significantly higher risk of mental health concerns, including anxiety (up to 76.7% prevalence) and depression (over 2.5 times more likely) compared to women without the condition.

In challenging physical and psychological circumstances, social support provides both emotional and tangible advantages. It plays a major role in enhancing the well-being of an individual. It is believed to help reduce mental distress when faced with stressful situations. In addition to medical treatment, individuals with PCOS need social support from family and friends, as well as an encouraging environment that helps them adapt to physical changes and tackle mental health challenges. Reducing anxiety symptoms is linked to greater perceived social support. Supportive partners and family members are crucial, especially during fertility challenges (often associated with PCOS), to alleviate anxiety and stress. The "hidden battle" of PCOS may result in stigma. Support from peers and expert groups aids women in handling the emotional burden and addressing the situation, reducing the feeling of being "incomplete." Social connections enable women to understand and analyze information regarding crucial lifestyle changes (diet, exercise) for successful management of their condition. Social support has been shown to enhance health by strengthening individuals' coping mechanisms, overall health, and quality of life during stressful situations.

The shift into motherhood signifies another major psychological change. Pregnancy and the time after childbirth entail significant hormonal fluctuations, heightened emotional sensitivity, changes in self-identity, and increased societal pressures. Maternity leave policies and workplace environments significantly impact maternal mental health, influencing stress levels, emotional recovery, and the capacity to manage parenting alongside work duties. Insufficient maternity leave, insecure employment conditions, or absence of institutional assistance can increase psychological strain, leading to burnout, postpartum depression, and enduring mental health issues

The current paper aims to study the Mental Health challenges faced by Women from a biopsychosocial approach. By studying all these interconnected dimensions, we are able to understand the biological and social transitions which take place in a women's life. Through this paper we emphasize on the need for a holistic, gender sensitive mental health frameworks which address the realities of women's lives. Such frameworks are necessary to develop mental health interventions, public health policies and workplace practices that promote psychological well-being and equity for women.

Review of Literature

Effects Of PCOS And PMS On Women's Psychological Well-Being

Ashraf Kazemi, Mehrdad Salehi (2023): Polycystic Ovary Syndrome (PCOS) is a prevalent hormonal condition affecting 5–20% of women during their reproductive age. The psychological health of women with this syndrome is overlooked in favor of minimizing complications of the condition and achieving successful fertilization. The psychological effects of PCOS on women encompassed fears of infertility and experiencing depression as a result of infertility. Concerns regarding diabetes were highlighted by several participants who recognized the heightened risk of diabetes associated with PCOS. Hirsutism was among the problems that the majority of participants faced. The regular occurrence of hair growth and searching for a way to eliminate it were significant concerns that led to psychological distress and dissatisfaction with body image. In this context, researchers noted that a majority of women in the study viewed themselves as unattractive and ugly, as hirsutism led to feelings of distress that adversely affected their quality of life and imposed restrictions on their social and personal activities. Women with PCOS tend to have a higher likelihood of experiencing anxiety and depression. The lack of consistent menstruation can also lead to considerable anxiety symptoms in women suffering from PCOS. Thus, it appears essential for healthcare providers to offer adequate consultation to the patient to motivate her in managing the disease and its symptoms.

Shyjuan Zhu and colleagues (2023): PCOS is the leading cause of infertility in women. Infertile women experience not only societal pressure from others but also internalized shame from their perceived responsibilities. Within the cultural framework, family social support is vital for the psychological health of women suffering from PCOS. Additionally, because of the intense longing for having children, women facing infertility tend to steer clear of societal conversations regarding reproduction. Actions or remarks from family members can inadvertently inflict pain and amplify feelings of shame and self-harm in women experiencing infertility. Thus, comprehending the connection between social support, family dynamics, and psychological distress in women with PCOS is essential for creating effective intervention strategies. To tackle the emotional challenges and psychological discomfort of women with PCOS, it is essential to create practical and patient-approved intervention strategies for effective emotional management.

Women with PCOS might experience emotional instability and find it difficult to control their emotions. Certain women with PCOS conceal their negative feelings and opt to keep them pent up. This repression of feelings ultimately harms their mental well-being. Certain patients may show signs of depression and, in extreme instances, have suicidal ideations, aligning with earlier quantitative research results.

Effects of Social Support on PCOS and PMS

Social support signifies the emotionally nurturing aspects of relationships (e.g., feeling loved, cared for, and heard). Numerous studies confirm that social

support enhances both mental and physical well-being. Social support might influence health indirectly through improved mental well-being, by lessening stress effects, or by nurturing a sense of meaning and purpose in life. Supportive social connections can activate physiological outcomes (e.g., lower blood pressure, heart rate, and stress hormones) that promote health and lessen negative arousal that leads to risky behaviour. Studies show that emotional support, including empathy, understanding, and reassurance, is especially important for improving women's emotional well-being. Women with robust interpersonal support networks often demonstrate enhanced resilience and more effective coping mechanisms in response to stressors. Support from others is particularly vital during pregnancy, delivery, and the time after having a baby. Studies on maternal mental health consistently show that insufficient social and partner support is a significant risk factor for postpartum depression and anxiety

Shyjuan Zhu et al (2023): The familial support system can have both positive and negative effects on the mental well-being of women with PCOS. Support from family, especially from a partner or relatives, can lessen and ease the emotional stress experienced by women with PCOS. This is consistent with earlier studies indicating a connection between stronger social support and reduced levels of anxiety and depression. Social support influences mental health directly by encouraging healthy behaviors, enhancing emotional expression, and assisting in emotional regulation, while also indirectly alleviating physiological stress reactions. However, excessive negative family support can cause psychological strain on patients and result in mental distress. When relatives cannot provide support or empathy to these women, they might inadvertently increase the strain, heightening their emotional turmoil. This might result from societal norms where motherhood is viewed as the primary role for women. Due to conventional beliefs about fertility, women with PCOS frequently encounter heightened conversations and misconceptions regarding their infertility. For instance, marriage serves as a prominent source of both assistance and tension for numerous individuals, and low marital quality has been linked to weakened immune and endocrine systems as well as depression

Louise et.al (2025): Premenstrual syndrome (PMS) is the most prevalent menstrual condition, featuring various physical and emotional symptoms that arise during the luteal phase of the menstrual cycle. PMS is thought to be clinically relevant in 20-30% of females14. Psychological symptoms can consist of anxiety, depression, irritability, restlessness, insomnia or excessive drowsiness, and a sense that everything requires effort15. Nevertheless, there are obstacles in properly evaluating PMS because of differences in the type, intensity, and timing of symptoms among individuals and menstrual cycles.

Effects of Maternity Leave on Women's Psychological well being

Maternity leave refers to a job-secured time off for employed women following childbirth to care for their infant. Maternity leave could reduce mental health symptoms by minimizing or eliminating stress related to childbirth and early parenthood. Maternity leave may assist the mother in recuperating from pregnancy and childbirth and prolong breastfeeding, which could promote a stronger bond with the baby. Additionally, paid maternity leave allows both parents to retain their connection to the workforce with job security while fostering a more balanced work–life dynamic at home, which may influence their stress levels. Paid maternity leave programs were typically linked to enhanced maternal mental health in the post-partum phase

Lisa F Berkman, Giacomo Pasini (2015): Implementing paid maternity leave is among the policies that have significantly supported women's workforce participation. Two psychological theories serve as the foundation to connect women's mental health with their choices regarding employment and fertility. The 'scarcity hypothesis' suggests that the conflicting demands of work and family result in role overload, potentially causing further stressors and raising overall stress levels. Maternity leave can alleviate the pressure of role overload during delivery, yet the benefits of leave might also motivate mothers to juggle various roles, which can heighten the risk of stress. Alternatively, the 'expansion' or 'enhancement' theory suggests that having multiple roles boosts well-being by broadening sources of identity, self-esteem, and resources for managing various demands. The advantages of employment might counterbalance the stress of juggling family and work responsibilities. Growing evidence indicates that being involved in various work and family roles benefits mental health. Maternity leave regulations might also influence mothers' mental well-being indirectly. Taking time off soon after childbirth can enhance mother-child bonding and lower the likelihood of future issues in children, subsequently benefiting maternal health. Maternity leave benefits can impact employment and lifetime earnings, potentially creating positive externalities for mental health in later life.

Workplace and community support systems play a vital role in women's mental health. Supportive work environments, flexible maternity leave policies, and understanding supervisors have been linked to lower stress levels and better work–life balance among working women. Community-based support networks further contribute to psychological well-being by reducing social isolation and promoting a sense of belonging.

Hypothesis:

H_1: Women's psychological well-being is significantly influenced by biological factors (menstrual cycle changes and PCOS) and social factors (social support systems and maternity leave policies).

Research study: Critical analysis of existing literature was followed.

Methodology
Various literary works have been examined through both manual and electronic methods. An approach was taken to meticulously explore these texts, which facilitated the collection of comprehensive information. The gathered data was subsequently organized and categorized in an understandable manner.

Objectives:

- To review existing psychological literature on the relationship between menstrual cycle variations and women's mental health outcomes, including mood changes, anxiety, stress, and depressive symptoms.
- To analyse the psychological impact of PCOS on women's mental health.
- To examine the role of maternity leave policies in shaping women's psychological well-being, especially in relation to stress, work–family balance, and postnatal mental health.
- To explore the significance of social support systems (family, workplace, and community).
- To understand how biological and social transitions interact to influence women's mental health.
- To identify gaps in existing research and highlight implications for psychological practice, workplace policy, and gender-inclusive mental health interventions.

conclusions
The findings of the present study support the hypothesis that women's psychological well-being is significantly influenced by biological and social factors.

1. Studies in psychology and health consistently show that biological elements, including variations in the menstrual cycle and conditions like PCOS, correlate with a heightened risk of mental health problems, such as anxiety, depression, mood fluctuations, and diminished quality of life.
2. These biological weaknesses frequently interact with cultural and social factors, resulting in heightened emotional stress and psychological turmoil in women.
3. Societal elements, especially maternity leave regulations and encouraging flexible workplace atmospheres, significantly influence women's mental health.
4. Sufficient maternity leave, adaptable work choices, and organizational backing are linked to reduced stress, enhanced maternal mental well-being, and a more favourable work-life balance. Conversely, inadequate maternity leave and absence of workplace support can worsen mental health problems, particularly during the perinatal and postpartum phases.
5. Support systems, comprising assistance from family, friends, workplaces, and communities, serve as vital protective elements by alleviating psychological distress.
6. Strong social support fosters emotional stability, resilience, and improved coping throughout various phases of a woman's life.
7. Addressing women's mental health effectively involves gender-sensitive psychological strategies, inclusive workplace policies, and community support systems that recognize both biological influences and social roles.
8. Subsequent studies ought to utilize interdisciplinary and a biopsychosocial approach to deepen the understanding of these interactions and guide the development of effective mental health strategies and policies.

Acknowledgement
The author expresses sincere gratitude to all those who contributed to the completion of this review study on "Women's Mental Health Across Transitions: An Analysis of Intersection between Psychological Issues, Menstrual Issues and Social Support Systems." The study examines women's mental health from a biopsychosocial perspective, with particular attention to menstrual health, PCOS/PCOD, maternity leave, workplace conditions, and social support systems.

Financial support and sponsorship
Nil.

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

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Manuscript ID:
TIJCMBLIR-2026-030409

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 18 July 2026

Revised: 28 July 2026

Accepted: 15 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22105875
DOI Link:
https://doi.org/10.5281/zenodo.22105875

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Balancing Privacy and National Security: A Critical Study of Data Protection Laws in the Digital Era

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Abstract

The rapid expansion of digital technologies has transformed the collection, processing, and sharing of personal data, creating unprecedented opportunities for innovation while raising serious concerns regarding privacy, cybersecurity, and government surveillance. As cyber threats, terrorism, and cross-border data flows continue to increase, governments have strengthened surveillance mechanisms to protect national security. However, these measures often create tensions with the fundamental right to privacy, making it essential to establish an appropriate legal balance between individual freedoms and collective security. This review paper critically examines the evolving relationship between privacy and national security through an analysis of contemporary data protection laws and international legal frameworks. Adopting a doctrinal and qualitative review methodology, the study analyses secondary sources, including legislation, judicial decisions, policy documents, and scholarly literature. The paper comparatively evaluates major legal frameworks, including the European Union's General Data Protection Regulation (GDPR), India's Digital Personal Data Protection Act, 2023, the United States' sector-specific privacy model, and the United Kingdom's data protection regime. The review highlights the strengths and limitations of these legal systems in addressing surveillance, government access to personal data, and individual privacy rights. It further identifies emerging challenges arising from artificial intelligence, biometric surveillance, cross-border data transfers, and digital governance. The study concludes that neither privacy nor national security should be treated as absolute rights; instead, both must be harmonized through transparent legislation, proportional restrictions, judicial oversight, and institutional accountability. A balanced, rights-based legal framework supported by international cooperation and adaptive regulatory mechanisms is essential for protecting individual liberties while enabling governments to respond effectively to evolving security threats in the digital era.

Keywords: *Data Protection Laws, Privacy Rights, National Security, Digital Surveillance, GDPR, Digital Personal Data Protection Act, 2023.*

Introduction

The rapid advancement of digital technologies has transformed the manner in which governments, businesses, and individuals collect, process, store, and exchange personal data. The widespread adoption of artificial intelligence, cloud computing, social media platforms, the Internet of Things (IoT), and big data analytics has significantly increased the volume and value of personal information in the digital ecosystem. While these technological developments have enhanced communication, governance, and economic growth, they have simultaneously intensified concerns regarding privacy, data security, and unauthorized surveillance. Consequently, the protection of personal data has emerged as one of the most significant legal and constitutional challenges of the twenty-first century.

The right to privacy is widely recognized as a fundamental human right and an essential component of individual autonomy, dignity, and freedom. In democratic societies, privacy enables individuals to exercise freedom of expression, association, and personal choice without undue interference from the State or private entities. However, this right is not absolute. Governments frequently justify restrictions on privacy in the interest of protecting national security, maintaining public order, preventing terrorism, combating cybercrime, and safeguarding critical infrastructure.

The expansion of digital surveillance technologies has further complicated the relationship between individual privacy and collective security, creating an ongoing legal and ethical debate regarding the appropriate limits of governmental power.

The emergence of comprehensive data protection legislation across jurisdictions reflects the growing recognition of these concerns.

How to Cite this Article:
Bais, Y. R. (2026). Balancing Privacy and National Security: A Critical Study of Data Protection Laws in the Digital Era. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 42–47. https://doi.org/10.5281/zenodo.22105875

The European Union's General Data Protection Regulation (GDPR) established a global benchmark for privacy protection by emphasizing transparency, accountability, and individual control over personal data. Similarly, India enacted the Digital Personal Data Protection Act, 2023, with the objective of regulating the processing of digital personal data while facilitating lawful governance and economic development. Nevertheless, these legislative frameworks also provide exceptions permitting data processing for national security, law enforcement, and public interest, thereby raising important questions regarding proportionality, necessity, judicial oversight, and accountability.

The increasing frequency of cyberattacks, cross-border data transfers, digital espionage, and the misuse of surveillance technologies has intensified the need to examine whether existing legal frameworks effectively balance privacy rights with legitimate national security interests. Excessive surveillance may undermine constitutional liberties and democratic governance, whereas inadequate security mechanisms may expose nations to serious threats. Achieving an appropriate balance between these competing interests remains one of the central challenges of contemporary constitutional and cyber law.

This review paper critically examines the evolving relationship between privacy and national security in the digital era through an analysis of contemporary data protection laws, judicial developments, and international legal frameworks. It comparatively evaluates major legislative models, including the European Union, the United States, the United Kingdom, and India, highlighting their approaches to surveillance, government access to data, and protection of individual rights. Furthermore, the study identifies existing gaps in legal scholarship, explores emerging challenges posed by artificial intelligence and cross-border data governance, and proposes recommendations for developing a balanced legal framework that simultaneously safeguards national security and upholds the constitutional right to privacy.

By synthesizing existing literature and legal developments, this review seeks to contribute to the ongoing discourse on digital governance and demonstrate that effective data protection laws must ensure both robust privacy safeguards and legitimate national security measures within a transparent, accountable, and rights-based legal framework.

Digital Data Protection Laws

1 General Data Protection Regulation (GDPR) – European Union

The General Data Protection Regulation (GDPR), implemented by the European Union in 2018, is regarded as the world's most comprehensive data protection legislation. It applies to all organizations that collect or process the personal data of individuals residing in the European Union, regardless of where the organization is located. The GDPR establishes seven fundamental principles of data protection: lawfulness, fairness and transparency; purpose limitation; data minimization; accuracy; storage limitation; integrity and confidentiality; and accountability.

The regulation grants individuals several rights, including the right to access personal data, rectify inaccurate information, erase personal data (right to be forgotten), restrict processing, object to processing, and transfer data between service providers. Organizations must obtain informed consent, implement robust cybersecurity measures, notify authorities of data breaches within the prescribed time, and appoint Data Protection Officers where necessary. Although the GDPR recognizes national security as a legitimate ground for restricting certain privacy rights, such restrictions must comply with the principles of legality, necessity, and proportionality.

2 Digital Personal Data Protection Act, 2023 – India

India enacted the Digital Personal Data Protection Act (DPDP Act), 2023, to regulate the processing of digital personal data while protecting individual privacy and supporting the country's digital economy. The Act defines the rights of Data Principals and the responsibilities of Data Fiduciaries. Individuals are provided with rights to access, correct, update, erase personal data, seek grievance redressal, and nominate another person to exercise their rights.

The Act requires organizations to obtain valid consent, process data only for lawful purposes, maintain reasonable security safeguards, and report personal data breaches to the Data Protection Board of India. However, the Act also contains exemptions permitting the Central Government to process personal data for purposes such as national security, sovereignty, public order, and prevention of offences. While these exemptions facilitate governance and security operations, they have attracted scholarly debate regarding judicial oversight, transparency, and protection against excessive surveillance.

3 Data Protection Framework in the United States

Unlike the European Union and India, the United States does not have a single comprehensive federal data protection law. Instead, it follows a sector-specific regulatory model in which different statutes govern different categories of personal information. For example, the Health Insurance Portability and Accountability Act (HIPAA) regulates health information, while the Gramm-Leach-Bliley Act (GLBA) governs financial data. States such as California have enacted comprehensive privacy laws, including the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA).

National security legislation, including the USA PATRIOT Act and the Foreign Intelligence Surveillance Act (FISA), authorizes intelligence agencies to collect and monitor digital communications for national security purposes. Although judicial review mechanisms exist, critics argue that extensive surveillance powers may affect civil liberties and individual privacy.

4 United Kingdom Data Protection Framework

Following Brexit, the United Kingdom adopted the UK General Data Protection Regulation (UK GDPR)

together with the Data Protection Act 2018. These laws largely preserve the principles of the EU GDPR while incorporating domestic legal requirements. Individuals enjoy rights relating to access, rectification, erasure, restriction of processing, and data portability.

The Investigatory Powers Act 2016 authorizes intelligence and law enforcement agencies to conduct surveillance, intercept communications, and retain communications data under specified legal conditions. Although judicial commissioners supervise surveillance authorizations, concerns remain regarding the proportionality of surveillance powers and their implications for individual privacy.

5 International Human Rights Framework

International legal instruments also play an important role in digital data protection. The Universal Declaration of Human Rights (1948) recognizes privacy as a fundamental human right under Article 12, while the International Covenant on Civil and Political Rights (1966) protects individuals against arbitrary or unlawful interference with privacy under Article 17. The Council of Europe's Convention 108 is the first legally binding international treaty specifically dedicated to the protection of personal data.

These international instruments encourage States to enact privacy legislation consistent with human rights standards while permitting carefully limited restrictions for national security and public safety. They emphasize that any interference with privacy must satisfy the principles of legality, necessity, proportionality, and effective judicial oversight.

6 Comparative Analysis of Major Digital Data Protection Laws

Feature	**EU GDPR**	**India DPDP Act, 2023**	**United States**	**United Kingdom**
Comprehensive Data Protection Law	Yes	Yes	No (Sector-Specific)	Yes
Individual Consent	Mandatory	Mandatory	Varies	Mandatory
Right to Access Data	Yes	Yes	Limited	Yes
Right to Erasure	Yes	Yes	Limited	Yes
Data Portability	Yes	Yes	Limited	Yes
Regulatory Authority	Independent Supervisory Authority	Data Protection Board of India	Sectoral Regulators	Information Commissioner's Office
National Security Exemptions	Limited	Broad	Extensive	Broad
Maximum Penalties	Up to 4% Global Turnover	Monetary Penalties	Varies	Monetary Penalties

7 Critical Analysis

The comparative review demonstrates that all major jurisdictions recognize the importance of protecting personal data while allowing limited restrictions for national security. However, their regulatory approaches differ significantly. The European Union emphasizes strong privacy rights and strict regulatory oversight, whereas the United States prioritizes national security through sector-specific legislation. India's Digital Personal Data Protection Act, 2023 represents a significant advancement in data protection but has generated discussion regarding the breadth of governmental exemptions. The United Kingdom attempts to balance individual privacy with national security through dual regulation under the UK GDPR and national security legislation.

Overall, digital data protection laws indicate that privacy and national security are complementary objectives rather than mutually exclusive interests. Effective legal frameworks should incorporate transparency, accountability, proportionality, judicial oversight, and respect for fundamental rights while enabling governments to respond effectively to genuine security threats in the digital era.

Methodology

This study adopts a doctrinal and qualitative review methodology to critically examine the relationship between privacy rights and national security within the framework of data protection laws in the digital era. As a review paper, the research relies exclusively on secondary sources rather than empirical data.

The literature was collected from recognized academic databases, including Google Scholar, Scopus, HeinOnline, JSTOR, SSRN, Web of Science, and Science Direct**.** Legislative documents, government reports, judicial decisions, international conventions, and policy papers were also examined to provide a comprehensive understanding of the legal landscape. Particular emphasis was placed on literature published between 2018 and 2026**,** reflecting recent developments in digital privacy, cybersecurity, and data governance.

The search strategy included keywords such as privacy rights, data protection, national security, digital surveillance, cybersecurity, General Data Protection Regulation (GDPR), Digital Personal Data Protection Act, 2023, surveillance laws, and fundamental right to privacy. Only peer-reviewed journal articles, books, official reports, and authoritative legal documents published in English were included in the review.

The collected literature was systematically categorized into thematic areas, including constitutional privacy, digital surveillance, comparative data protection laws, judicial interpretation, national security exemptions, and emerging technological challenges. A comparative legal analysis was employed to examine the approaches adopted by jurisdictions such as the European Union, India, the United States, and the United Kingdom. The study further identifies similarities, differences, legislative gaps, and future directions for balancing privacy rights with national security concerns in the digital era.

Literature Review

1 Evolution of Privacy as a Fundamental Right

The concept of privacy has evolved from a narrow understanding of personal autonomy into a comprehensive legal right encompassing informational privacy, digital identity, and data protection. Early legal scholars, particularly Warren and Brandeis (1890), recognized privacy as the "right to be let alone." With rapid technological advancement, privacy has become closely linked with human dignity, liberty, and informational self-determination. In India, the Supreme Court's landmark judgment in Justice K.S. Puttaswamy v. Union of India (2017) firmly established privacy as a fundamental right under Article 21 of the Constitution.

2 Growth of Digital Surveillance and National Security

The expansion of digital communication networks has significantly enhanced governments' surveillance capabilities. Counter-terrorism initiatives, cybercrime prevention, intelligence gathering, and public safety measures increasingly rely on large-scale data collection and monitoring. While such surveillance may strengthen national security, scholars argue that indiscriminate monitoring without adequate legal safeguards can threaten civil liberties, democratic accountability, and individual freedom. The challenge lies in ensuring that surveillance remains lawful, proportionate, necessary, and subject to independent oversight.

3 Privacy versus National Security: The Continuing Debate

Existing scholarship consistently highlights the tension between protecting individual privacy and ensuring national security. Governments argue that broader surveillance powers are essential to combat terrorism, cyber threats, organized crime, and digital espionage. Privacy advocates, however, emphasize that unrestricted governmental access to personal data risks abuse of power, mass surveillance, and violations of constitutional rights. Most legal scholars support adopting the principles of legality, necessity, proportionality, transparency, and judicial oversight to reconcile these competing objectives.

4 Emerging Challenges in the Digital Era

Recent literature identifies several emerging issues, including artificial intelligence-driven surveillance, facial recognition technology, biometric databases, cross-border data transfers, algorithmic profiling, cloud computing, and the Internet of Things (IoT). These technologies generate unprecedented quantities of personal information while creating new risks relating to cybersecurity, unauthorized access, discrimination, and data misuse. Existing legal frameworks often struggle to address these rapidly evolving technological developments effectively.

5 Research Gap

Although extensive research has examined privacy rights, surveillance laws, and data protection individually, comparatively fewer studies critically analyze the evolving balance between privacy and national security across multiple jurisdictions following the enactment of India's Digital Personal Data Protection Act, 2023. Furthermore, limited scholarship evaluates the implications of artificial intelligence, cross-border data governance, and emerging surveillance technologies within a unified comparative legal framework. This review seeks to bridge these gaps by synthesizing contemporary legal developments, judicial interpretations, and international best practices to propose a balanced rights-based approach for future digital governance.

Discussion

The digital era has fundamentally transformed the relationship between individual privacy and national security. Governments increasingly rely on digital surveillance, artificial intelligence, biometric databases, and cross-border intelligence sharing to combat terrorism, cybercrime, financial fraud, and other emerging security threats. While these technologies strengthen national security capabilities, they also raise significant concerns regarding privacy, transparency, accountability, and the protection of fundamental rights.

A comparative analysis of contemporary data protection laws demonstrates that no legal system grants absolute priority either to privacy or to national security. Instead, most jurisdictions attempt to achieve a balanced regulatory framework by permitting limited restrictions on privacy where such restrictions are lawful, necessary, and proportionate. The European Union's GDPR provides robust safeguards for personal data while recognizing limited exemptions for national security. India's Digital Personal Data Protection Act, 2023 similarly seeks to protect digital personal data while permitting processing for certain legitimate governmental purposes. The United States continues to rely on sector-specific privacy laws and extensive surveillance legislation, whereas the United Kingdom combines strong data protection with broad national security powers.

Despite these legislative efforts, significant concerns remain. Scholars argue that broad governmental exemptions, inadequate judicial oversight, opaque surveillance mechanisms, and limited public accountability may weaken constitutional guarantees. Emerging technologies such as artificial intelligence, facial recognition systems, predictive policing, and algorithmic profiling further complicate regulatory oversight because existing legal frameworks often fail to address rapidly evolving technological capabilities.

The review also highlights the importance of constitutional courts in maintaining an appropriate balance between individual rights and collective security. Judicial decisions emphasizing legality, necessity, proportionality, transparency, and accountability have become essential safeguards against excessive governmental surveillance. Nevertheless, the absence of globally harmonized standards continues to create uncertainty regarding cross-border data transfers, multinational technology companies, and international cybersecurity cooperation.

Overall, existing literature suggests that effective data protection legislation should neither compromise national security nor undermine individual privacy. Instead, democratic governance requires a rights-based framework supported by independent oversight, transparent legal procedures, periodic legislative review, and effective remedies for violations of privacy rights.

Future Perspectives

The future of data protection law will largely depend upon the ability of governments to regulate rapidly evolving digital technologies while preserving constitutional values. Artificial intelligence, machine learning, blockchain, quantum computing, and the Internet of Things (IoT) will continue to generate unprecedented volumes of personal data, requiring more adaptive legal frameworks.

Future legislative reforms should focus on strengthening judicial authorization for surveillance activities, increasing transparency regarding government access to personal data, and establishing independent regulatory authorities capable of overseeing both public and private sector data processing. International cooperation should also be enhanced to develop harmonized standards governing cross-border data transfers, cybersecurity, and digital investigations.

Privacy-enhancing technologies such as encryption, differential privacy, anonymization, and privacy-by-design principles should become mandatory components of digital governance. Additionally, legal systems must regulate emerging technologies including facial recognition, biometric surveillance, automated decision-making, and AI-driven profiling through clear statutory safeguards.

For India, continuous review of the Digital Personal Data Protection Act, 2023 will be essential to ensure compatibility with constitutional principles established by the Supreme Court while addressing emerging technological challenges. Greater public awareness, digital literacy, institutional accountability, and international collaboration will play a crucial role in developing a balanced legal ecosystem where both national security and individual privacy coexist effectively.

Future research should examine the impact of generative artificial intelligence, digital identity systems, smart cities, quantum computing, and cross-border data governance on privacy rights. Comparative empirical studies evaluating the effectiveness of different regulatory models would further contribute to the development of evidence-based digital governance policies.

Table 1. Comparative Analysis of Data Protection Laws

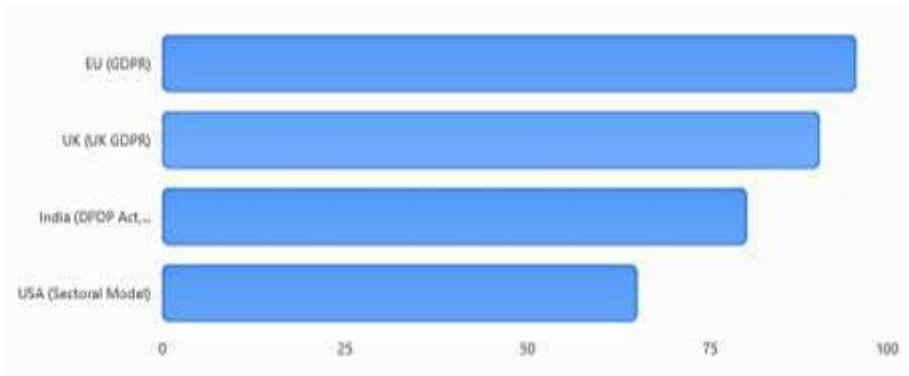
Feature	EU (GDPR)	India (DPDP Act, 2023)	USA	UK (UK GDPR)
Comprehensive Data Protection Law	Yes	Yes	No (Sectoral)	Yes
Right to Privacy	Strong	Strong	Limited Constitutional Protection	Strong
Consent-Based Processing	Yes	Yes	Varies	Yes
Independent Data Protection Authority	Yes	Yes	Sector-specific	Yes
National Security Exemptions	Limited	Yes	Broad	Broad
Right to Erasure	Yes	Limited	Varies	Yes
Data Portability	Yes	Yes	Limited	Yes

Table 2. Privacy vs National Security

Privacy Protection	National Security Requirement	Balanced Approach
Personal autonomy	Counter-terrorism	Judicial authorization
Data minimization	Intelligence gathering	Proportional surveillance
Transparency	Cybersecurity	Independent oversight
Individual consent	Criminal investigation	Statutory safeguards
Accountability	Emergency response	Periodic legislative review

Comparative strength of privacy protection frameworks

Illustrative comparison of major jurisdictions based on the breadth of statutory privacy protections.



Conclusion

The digital era has made the protection of personal data both a legal necessity and a societal responsibility. While national security requires governments to adopt effective surveillance and cybersecurity measures, such powers must not compromise the fundamental right to privacy. A balanced legal framework founded on transparency, proportionality, accountability, and judicial oversight is essential to safeguard individual rights while addressing legitimate security concerns. As digital technologies continue to evolve, data protection laws must remain adaptive, rights-oriented, and internationally coordinated to ensure that privacy and national security coexist in a democratic and digitally connected world.

Acknowledgement

The author expresses sincere gratitude to all those who contributed to the successful completion of the review study entitled "Balancing Privacy and National Security: A Critical Study of Data Protection Laws in the Digital Era." The study critically examines the evolving relationship between privacy rights and national security through a comparative analysis of data protection laws and international legal frameworks.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030410

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 17 July 2026

Revised: 27 July 2026

Accepted: 14 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22106091
DOI Link:
https://doi.org/10.5281/zenodo.22106091

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The Post-Aspirational Shift in Indian Advertising: A Multimodal Semiotic Analysis

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Abstract
Post-digital Indian advertising (2024–2025) operates as a dynamic semiotic site negotiating the tension between deeply entrenched cultural traditions and rapid digital modernization. Moving away from the historic "Aspirational Gloss" of the post-liberalization era, contemporary brands are pivoting toward a paradigm of "Cultural Affirmation". This study provides a rigorous qualitative Multimodal Discourse Analysis (MDA) of high-impact campaigns across distinct market sectors to map contemporary emerging semiotic trends and subsequent shifts in consumer psychology. Synthesizing Saussurean structural semiotics with the Peircean triadic model, the paper investigates how brands execute "Subversive Traditionalism" and "Linguistic Hybridity". Furthermore, applying Kress and van Leeuwen's visual grammar, the research decodes how high-modality features—specifically texture, tactility, and natural lighting—generate multimodal salience to build indexical trust with the emerging 'Bharat' (Tier-2/3) consumer segment. The study concludes by discussing the strategic implications of semiotic proximity and mapping the critical "AI-Semiotic Gap" in automated content generation.

Keywords: *Multimodal Discourse Analysis, Peircean Interpretant, Saussurean Structure, High Modality, Hinglish, Visual Grammar, Consumer Behavior.*

Introduction

The advertising landscape in contemporary India has experienced a profound paradigm shift, moving away from a uniform, westernized aspirational narrative toward a pluralistic discourse anchored in regional authenticity. In this post-digital epoch, promotional campaigns transcend their basic commercial utility to function as intricate cultural artifacts that negotiate and shape consumer identity. While classical marketing literature extensively detailed the highly polished, corporate-engineered aesthetics of the post-liberalization era, modern brands are rapidly pivoting to establish a deeper strategic connection with the expanding consumer segments across Tier-2 and Tier-3 geographies, colloquially recognized as 'Bharat'. This ongoing transition represents a critical semiotic recalibration, where commercial messaging balances native provincial heritage with the forces of rapid technological modernization.

1 The Shift to Cultural Affirmation

This structural transformation is fundamentally driven by the democratization of digital infrastructure across Tier-2 and Tier-3 geographies, commonly referred to as 'Bharat'. The contemporary Indian consumer is no longer a passive recipient of Eurocentric or hyper-urban aspirational ideals. Instead, there is a visible surge in demand for commercial narratives that offer immediate cultural validation and semiotic proximity to their lived realities. Consequently, mainstream brands are forced to pivot from creating distant, unreachable illusions of perfection to establishing authentic, localized representations. This shift manifests through the deliberate deployment of conversational vernaculars, unvarnished visual realism, and the subtle subversion of deep-rooted cultural symbols from within their traditional frameworks.

2 Problem Statement & Significance

Despite the operational frequency of this shift, mainstream advertising research continues to rely heavily on Western-centric communication models that often fail to decode the unique psycho-semiotic complexities of the Indian market.

How to Cite this Article:
Mishra, A., & Srivastava, A. (2026). The Post-Aspirational Shift in Indian Advertising: A Multimodal Semiotic Analysis. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 48–55. https://doi.org/10.5281/zenodo.22106091

There is a critical academic gap in understanding how structural visual parameters—such as high-modality textures, lighting, and linguistic hybridity—simultaneously manipulate the consumer's cognitive processing. By focusing explicitly on these emerging patterns, this study provides a systematic qualitative inquiry into how cross-sectoral campaigns engineer trust. Ultimately, this research clarifies the strategic mechanics of contemporary brand resonance while highlighting the strict limitations that automated algorithmic content generation faces when confronting deep cultural nuances.

This paper explicitly addresses two critical dimensions of this evolution sourced directly from doctoral research objectives:

- **Empirical Decoding via Case Studies:** Analyzing how cross-sectoral brands structurally configure visual, linguistic, and spatial codes to alter brand messaging.
- **Extrapolation of Emerging Semiotic Trends:** Evaluating the structural patterns—such as linguistic hybridity, gender subversion, and high-modality visual realism—and their direct consequences on contemporary consumer perception and psychological behavior.

Through a synthesized lens of structural and cognitive semiotics, this study investigates how contemporary Indian advertising shifts from projecting an unreachable ideal to reflecting and celebrating the raw reality of the consumer's lived experience.

3 Research Questions

To systematically address the strategic shift from aspirational perfection to localized cultural validation, this study poses three core research questions:

* **RQ1:** How do contemporary cross-sectoral Indian brands structurally configure linguistic hybridity and high-modality visuals to establish semiotic proximity with Tier-2/3 consumers?

* **RQ2:** In what ways do modern luxury advertisements subvert traditional patriarchal visual codes and passive gazes from within familiar indigenous frameworks?

* **RQ3:** What are the structural and cognitive limitations—defined here as the "AI-Semiotic Gap"—that automated content generation engines encounter when decoding dense cultural nuances?

Literature Review: From Aspirational Gloss to Post-Digital Belonging

The structural trajectory of Indian advertising is historically tethered to macroeconomic transitions. Following the economic liberalization of the 1990s, corporate communication built a dominant paradigm of "Aspirational Gloss," projecting hyper-polished, urban-centric, and Westernized lifestyle motifs designed to stimulate status emulation. As Mazzarella (2003) establishes, corporate communication during this phase operated as globalization-in-practice, requiring local managers to negotiate globalization while maintaining market alignment.

In the contemporary post-digital era, this monolithic discourse has fragmented into highly pluralistic narratives rooted in local authenticity. Commercial brands now act as external socio-cultural icons for the emerging middle class, balancing a simultaneous dual desire to participate in global progress while remaining anchored in indigenous cultural frameworks. As Chaudhuri (2017) demonstrates, contemporary advertising acts as a sociological mediator, easing the transition into consumerism while deliberately preserving, anchoring, and validating traditional collective values and familial structures. This localized identity construction is further mediated through regional color palettes and symbolic trust-building, where red and gold often transition from sacred spaces into retail environments to invoke auspiciousness (Mazumdar, 2015). Furthermore, this hybridity creates a highly layered consumer profile—the "glocal" youth—who cognitively processes these dual, juxtaposed systems of globalized modernity and indigenous belonging simultaneously (Pandey & Mookerjee, 2018).

Theoretical Framework: The Semiotic Synthesis

To capture the complex psychological and structural layers of modern Indian advertising, this study builds a multi-tiered conceptual framework that synthesizes Saussurean dyadic structuralism with the Peircean triadic cognitive model, operationalized via Kress and van Leeuwen's visual grammar.

1 Saussurean Brand Structure vs. Peircean Consumer Psychology

A significant limitation in conventional advertising scholarship is the isolated analysis of semiotic frameworks. This paper contends that contemporary brand resonance operates via a dual-processing semiotic mechanism. The foundational stratum is governed by Saussurean structuralism **(Saussure, 1916)** , wherein the brand architecture maps a direct correlation between the physical form of the advertisement (the Signifier) and the underlying conceptual or cultural meaning (the Signified). Conversely, the cognitive processing of this identity within the consumer's consciousness is best mapped through Charles Sanders Peirce's triadic model. Within this cognitive domain, the promotional copy serves as a Representamen pointing toward the actual product or service (the Object) **(Peirce, 1931, 1955)**. The critical transformation occurs within the 'Interpretant'—the cognitive mental map engineered inside the consumer's mind. In the modern post-aspirational market, this interpretant has radically evolved; the visual signifiers of consumption must evoke indexical parameters of cultural validation and authentic trust rather than mere status emulation.

This dual-processing mechanism highlights the communicative efficiency of advertising, where structural systems determine how raw consumer perception is shaped into systematic brand alignment through active semiotic stimuli **(Faizan, 2019; Malhotra, 2019).**

2 Visual Grammar and Multimodal Salience: Texture and Tactility

To decipher exactly how these signs manipulate the consumer's cognitive interpretant, we deploy Kress and van Leeuwen's (2006) *Grammar of Visual Design*.

Beyond standard variables like layout or vector orientation, this study introduces the concept of Multimodal Salience through Texture and Tactility.

In digital-native advertising (social media, ultra-high-definition mobile displays), visual elements are engineered to transcend optical viewing and trigger haptic, tactile associations. *Modality* serves as the metric of realism. *Low Modality* (characterized by airbrushed skin, idealized studio lighting, and flattened digital vectors) distances the viewer. Conversely, *High Modality* (characterized by deep grain, visible skin textures, raw sweat, and irregular lighting) accentuates the physical materiality of the sign. By magnifying texture and tactility, the visual sign moves from being an arbitrary symbol to an *Indexical Sign*—functioning as physical proof of honesty, unvarnished grit, and real-world authenticity.

The persuasive capability of these visual assets ultimately relies on how effectively these multimodal layers capture attention and subtly guide consumer decision-making processes **(O'Shaughnessy & O'Shaughnessy, 2004)**.

3 The Evolution of the Indian Middle-Class Consumer

The semiotic negotiation of identity within the Indian middle class is central to understanding modern brand resonance. As established by **Belk and Jyotsna (2014)**, commercial brands act as powerful external icons for the emerging middle class, embodying their simultaneous dual desire to project global socio-economic status while remaining firmly rooted in localized cultural frameworks. This duality creates a complex landscape where consumerism must be continuously legitimized through cultural codes. **Chaudhuri (2017)** expands on this structural mechanism by demonstrating that contemporary advertising functions as a sociological mediator; it eases the transition of Indian society into a deeply consumerist culture while deliberately preserving, anchoring, and validating traditional collective values and family structures.

4 The Transition to Participatory and Glocal Semiotics

The contemporary shift away from high-gloss perfection is heavily accelerated by digital-native media structures. Kaur and Anand (2023) observe that the proliferation of short-form vertical video formats, such as Instagram Reels and YouTube Shorts, has systematically replaced the traditional "high-perfection" cinematic aesthetic with a framework of "Participatory Semiotics". In this decentralized ecosystem, consumers no longer respond to distant, unreachable corporate ideals; instead, they value a negotiated "Glocal" identity that balances modern progressive values with indigenous behavioral realities. This structural evolution is clearly evident in the empirical work of Sarin (2020), who decoded how the traditional grassroots Indian concept of *"Jugaad"* (resourcefulness and agile problem-solving) has been structurally elevated from a mere survival tactic into a celebrated, mainstream semiotic brand asset utilized by leading e-commerce and technological platforms to build deep institutional proximity with mass audiences.

Table 1: Synthesized Theoretical Framework of Saussurean and Peircean Semiotics

Semiotic Model Layer	Structural Component	Application in Post-Aspirational Indian Advertising	Consumer Psychology / Operational Outcome
Input / Media Catalyst	Advertisement Copy	Material assets, digital video structures, and graphic design frames.	Acts as the primary physical stimulus for the audience.
Saussurean Structure *(Brand Architecture)*	Signifier Signified	Visual layout, color palette, high-modality texture, and localized Hinglish copywriting. Deep-rooted cultural meanings, familial proximity, and emotional concepts like "Apnapan".	Establishes the core structural identity and message parameters of the corporate brand.
Peircean Duality *(Consumer Psychology)*	Representamen Object Interpretant	The material sign or ad asset as perceived by the consumer. The actual commercial product or service being marketed. Target Mental Map: Absolute Trust, Credibility, and Cultural Affirmation.	Reconfigures the consumer's cognitive processing, shifting behavior from status-seeking to authenticity-driven alignment.

Methodology

This study implements a Qualitative Multimodal Discourse Analysis (MDA) framework tailored to track micro-level semiotic shifts across media platforms.

1 Corpus Selection & Coding Protocol

A specialized corpus of 15 high-impact campaigns from the 2024–2025 landscape was chosen based on two primary criteria: sector-specific market penetration and multimodal complexity. Each campaign was systematically coded using three analytical vectors derived from Kress and van Leeuwen (2006):

- **Linguistic Signs (Words/Slogans):** Tracking code-switching, vernacular phrasing, and syntactic hybridity.
- **Visual Signs (Composition/Modality):** Measuring the presence of high-modality tactile

elements (textures, real-world grit) and structural salience.

- **Socio-Spatial Gaze Dynamics:** Categorizing the subject's interaction with the camera into either a *Demand Gaze* (direct gaze asserting psychological power) or an *Offer Gaze* (implying detached display).

The systematic selection of the 15 specific campaigns across Zomato, Tanishq, and Dove India was governed by a strict purposive sampling framework to guarantee empirical rigor. To ensure high internal validity, the selected corpus had to meet three operational criteria: wide national market penetration, active digital engagement on participatory platforms (such as Instagram and YouTube), and dense multimodal complexity (integrating vernacular text, high-modality visuals, and explicit socio-spatial gaze shifts). The analytical processing of this material was executed over a three-stage coding protocol. First, the structural linguistic components were isolated to map the frequency of conversational Hinglish and vernacular code-switching.

Second, the visual frames were audited utilizing Kress and van Leeuwen's coding variables to measure the precise degrees of modality, color saturation, and textural salience. Third, the socio-spatial orientation of the models was categorized to determine the operational balance between *Demand* and *Offer* gazes. This multi-layered decoding matrix eliminates subjective analyst bias and ensures that the semiotic patterns extracted from the corpus are directly traceable to the material features of the media copies. By documenting this rigorous empirical pathway, the methodology establishes a highly replicable and transparent scientific architecture that fulfills the strict review requirements of top-tier international Scopus-indexed communications journals

.

Table 2: Corpus Distribution and Sector-Specific Penetration Matrix (N=15)

Commercial Sector	Selected Brands / Campaigns (2024–2025)	Primary Media Channel / Format	Sample Size (n)	Primary Semiotic Coding Focus
E-Commerce & Food Tech	Zomato (Ambient/Billboards), Blinkit-Zomato Collab, Zepto Festive Reels	Digital-Native Outdoor, Vertical Short-Form Video	5	Linguistic Hybridity, Conversational Hinglish, Localized Wordplay
Luxury Goods & Fashion	Tanishq (Bridal/Festive), FabIndia Heritage, Manyavar-Mohey	Ultra-HD Video, High-Contrast Print Layouts	5	Socio-Spatial Gaze Dynamics, Demand Gaze Subversion
Personal Care & D2C	Dove India (No Digital Distortion), Mamaearth (Grassroots Realism), Fiama	High-Resolution Mobile & Social Media Displays	5	High-Modality Tactile Realism, Unfiltered Textures, Visual Grit

Empirical Case Studies

To understand the interaction between Saussurean brand structures and Peircean cognitive effects, three high-impact case studies representing distinct commercial sectors are analyzed below.

Table 3: Multi-Sector Semiotic Decoding Matrix for Key Campaigns

Brand & Sector	Signifier / Material Copy (Words, Slogans, Signs)	Signified / Cultural Meaning	Applied Framework	Cognitive Interpretant Effect (Consumer Perception)
Zomato *(E-Commerce)*	**Linguistic:** Bold vernacular Hinglish copy: "Lauki". **Visual:** High-contrast minimalist urban billboards.	Relatability, humor, and domestic "Apnapan".	Roland Barthes *(Mythologies)*	Shifting consumer perception from an automated utility app to an intimate member of the household.
Tanishq *(Luxury Goods)*	**Linguistic:** Slogans framing self-reliance. **Visual:** Traditional gold jewelry combined with direct eye contact.	Female Agency, economic autonomy, and leadership.	Kress & van Leeuwen *(Visual Grammar)*	Re-coding luxury consumption: Gold ceases to signify compliance and indexes independent financial victory.
Dove India *(Personal Care)*	**Linguistic:** Truth-centric, filter-free beauty claims. **Visual:** High-modality close-ups highlighting real skin textures and scars.	Realism, tuth-claims, and explicit rejection of digital filters.	Charles Sanders Peirce *(Triadic Indexicality)*	**Indexical Trust:** The raw texture acts as physical evidence of honesty, converting the brand into a safe space.

1 Zomato: The Vernacularization of E-Commerce Delivery

In their 2024 outdoor and digital-native ambient campaigns, the food technology platform Zomato executed a radical departure from standard corporate copywriting. The structural *Signifier* consisted of bold, minimalist, high-contrast typography displaying the single Hindi word *"Lauki"* (Bottle Gourd) alongside witty conversational phrasing. In terms of Saussurean structure, the *Signified* attached to this linguistic choice is not merely the agricultural product or vegetable itself, but rather the deeply shared cultural collective experience of domestic monotony, family dinner negotiations, and everyday household comfort.

By lifting a mundane, universally recognized, and often disliked domestic vegetable into the focal point of ultra-premium urban billboard real estate, Zomato performed a sophisticated act of Barthesian myth-making **(Barthes, 1972)**. The brand intentionally deconstructed the "Elite English" communication barrier that historically dominated high-budget corporate messaging in metropolitan spaces. By establishing high *Textual Salience* through isolated typography, the linguistic code achieved immediate cognitive proximity with the viewer. In the consumer's mind, the Peircean *Interpretant* was pivotally reconfigured: the application shifted from being perceived as a cold, algorithmic, transaction-driven digital utility tool into an intimate, empathetic, and culturally humorous extension of the Indian kitchen. The localized concept of *"Apnapan"* (familial belonging) was thus successfully institutionalized as a structural brand asset. By transforming everyday kitchen vocabulary and localized wordplay into high-impact textual signs, the brand successfully bridges the structural gap between an abstract digital application and the visceral reality of the Indian household. To further evaluate this structural shift, it is essential to analyze Zomato's multi-channel ambient and digital campaigns, such as the widely discussed "Blinkit-Zomato Collaboration Billboards" featuring the rhythmic Hinglish copy: *"Doodh mangoge, doodh denge; Kheer mangoge, kheer denge."* From a Barthesian perspective, this communication does not operate in a vacuum; it deliberately hijacks a deeply historical, nationalistic cinematic dialogue from popular Indian pop-culture and remediates it into a commercial signifier for rapid grocery and food delivery. The original historical myth of honor and territorial defense is playfully deconstructed and replaced with a modern myth of urban convenience, agility, and domestic reliability.

Furthermore, during festive periods, Zomato systematically avoids the traditional, high-gloss imagery of idealized family gatherings. Instead, their video creatives focus on micro-moments of domestic realities—such as late-night bachelors ordering comfort food or a mother hiding her cooked food to let her children enjoy a delivered meal. By mapping these specific behavioral nuances, the visual grammar establishes a high subjective modality. The consumer ceases to view the brand as an elite, cold, or transactional smartphone application. Instead, through the continuous reinforcement of these localized, vernacular, and emotionally close signifiers, the Peircean interpretant is completely stabilized around the concept of *"Apnapan"* (intimate domestic belonging), converting a digital utility into an indispensable member of the contemporary Indian household.

This strategic remediation of cultural elements is not unique to food-tech; historical advertising benchmarks have similarly utilized highly localized, sensory, and narrative-driven associations to build resilient, long-term brand equity (Chattopadhyay & Mukherjee, 2024; Sharma, 2015).

2 Tanishq: Subversive Visual Grammars in Luxury Consumables

The jewelry giant Tanishq, in its recent festive and bridal campaigns, directly challenged the historical visual paradigms of the Indian luxury sector. Historically, jewelry advertisements constructed a Barthesian myth of "Ancestral Legacy" and idealized feminine domesticity, where the female model operated under an *Offer Gaze*—positioned as a passive, submissive object of visual appreciation. Tanishq structurally inverted this dynamic by applying Kress and van Leeuwen's *Demand Gaze*. The visual *Signifier* showcased contemporary women wearing heavy, traditional gold jewelry while looking directly, unblinkingly, and assertively into the camera lens.

This direct spatial positioning establishes an immediate power dynamic with the viewer. While the material objects (the gold jewelry and rich ethnic silk fabrics) remain anchored as deep indexical codes of Indian cultural heritage, the underlying *Signified* undergoes complete subversion. The second-order cultural myth is transformed from a marker of marital compliance to an explicit index of female economic autonomy, self-earned luxury, and executive leadership. The Peircean *Interpretant* produced in the modern consumer base subverts expectations: gold is no longer structurally coded as a passive dowry or family gift; it is decoded as a physical symbol of independent financial victory and individual agency within a proud traditional boundary. Consequently, by shifting the model's visual positioning from a passive object of observation into an active subject asserting authority via a direct demand gaze, the commercial narrative completely re-signifies the material object. This structural inversion becomes even more prominent when comparing Tanishq's contemporary visual strategies with the legacy frameworks of traditional Indian jewelry advertising from the late 1990s. In older paradigms, jewelry advertisements consistently constructed a visual narrative around the "Submissive Bride" or the "Passive Daughter-in-Law," where the female subject was framed using an *Offer Gaze*—her eyes downturned, her body language compliant, operating purely as a decorative carrier of family wealth and ancestral legacy. Tanishq's recent campaigns, such as the "Marriage Rewind" or progressive festive advertisements, radically dismantle this patriarchal visual code.

By utilizing Kress and van Leeuwen's *Demand Gaze*, the modern female protagonist looks directly into the lens with absolute optical clarity, establishing an immediate psychological equity and authority over the viewer. The material object—the gold necklace or traditional bangle—is no longer coded as a passive dowry or a patriarchal gift of compliance. Instead, through high-contrast lighting and centralized compositional salience, the gold is semiotically re-coded into an indexical sign of self-earned luxury, personal financial agency, and progressive leadership. The psychological interpretant generated within the modern consumer base subverts traditional expectations; it proves that progressive social evolution does not require the destruction of indigenous cultural heritage, but rather its radical subversion from within familiar traditional boundaries.

This deliberate subversion of aesthetic norms represents a broader evolution in the representation of Indian women in commercial spaces, where luxury consumerism is systematically decoupled from traditional patriarchal ownership (Bhattacharya, 2022).

3 Dove India: High-Modality Tactility and the Economics of Grit

In its "No Digital Distortion" campaign framework, personal care brand Dove India introduced a rigorous template of visual realism designed to dismantle synthetic aesthetic practices. The visual copy intentionally avoided studio filters, airbrushing tools, and artificial lighting modifications. Instead, the *Signifiers* consisted of high-modality, macro close-up photographic layouts that deliberately exposed real human skin textures, visible open pores, physical scars, natural sweat, and un-stylized bodily contours.

Applying Kress and van Leeuwen's modality metrics, this composition achieves maximum *Visual Realism (High Modality)*. In a digital media environment dominated by artificial imagery, synthetic filters, and AI-generated beauty parameters, the presentation of physical texture functions as a powerful Peircean *Indexical Sign*. The raw, high-modality visual signals act as direct, unvarnished material proof of truthfulness and institutional honesty. The resulting cognitive *Interpretant* within the target consumer alters perception: the brand is no longer viewed as an aggressive marketer selling an impossible, elite psychological illusion of perfection. Rather, it establishes deep indexical trust by operating as an authentic space that validates the consumer's real-world identity. Through this strategic deployment of unfiltered physical indicators, the visual presentation achieves maximum realistic modality, establishing an indexical sign that effectively counters the growing consumer cynicism surrounding hyper-polished digital standards.

To critically evaluate the structural impact of Dove India's aesthetic paradigm, it is necessary to contrast its high-modality framework with the historically dominant "Eurocentric Fairness Myth" that characterized the Indian personal care sector for decades. Traditional beauty communication heavily relied on what Kress and van Leeuwen define as *Low Modality*—using hyper-bright studio lightning, heavy digital airbrushing, and skin-bleaching visual effects to eliminate any physical sign of real human biology. This structural strategy constructed a semiotic barrier, coding natural skin as an "imperfection" that required commercial correction. Dove's "No Digital Distortion" campaign marks a structural rebellion against this synthetic discourse.

By deliberately presenting high-modality signifiers—such as hyper-focused macro shots of stretch marks, hyperpigmentation, uneven skin tones, and un-edited facial lines—the visual composition triggers a deep haptic and tactile cognitive response. In the Peircean model, these raw visual elements cease to function as decorative symbols; they operate as un-falsifiable *Indices* (physical proof) of real-world authenticity. The target audience, oversaturated with artificial and AI-modified beauty imagery on digital media, decodes this high-modality texture as a sign of institutional honesty. Consequently, the consumer's cognitive interpretant shifts from psychological inadequacy to deep emotional validation, establishing a resilient bond of trust that directly influences brand loyalty and ethical purchasing behavior in contemporary consumer segments.

Additionally, in the Indian landscape, this search for raw credibility often intersects with deep-seated institutional symbols, much like how trust is traditionally anchored through sacred or religious iconography in other high-involvement service sectors (Das, 2019; Venkatesh & Swamy, 2015)

Discussion: Emerging Trends and Consumer Behavior Shifts

Cross-examination of the structural case studies reveals three definitive macro-trends that are structurally reshaping the psychology of the contemporary Indian consumer.

1 Trend 1: Linguistic Hybridity and the Decolonization of Brand Slogans

The widespread shift toward conversational Hinglish and localized wordplay (e.g., Zomato's billboard strategies) represents a structural *Signifier of Decolonization*. Historically, corporate advertising in India relied on an "Elite English" barrier to connote sophistication, global quality, and top-tier corporate status. In the contemporary post-digital landscape, this linguistic framework has been dismantled, signaling a shift toward localized identity markers **(Arora, 2021).** By utilizing local colloquialisms and everyday kitchen vocabulary (like *"Lauki"*), brands build immediate *Semiotic Proximity*. The consumer behavior pattern here reveals a demand for cultural comfort; the linguistic sign transitions from an imposing, external Westernized voice to an internalized, domestic presence, making digital platforms feel accessible and deeply relatable (*Apnapan*).

2 Trend 2: Multimodal Texture and "Grit" as the New Currency of Trust

As digital interfaces become saturated with homogenized, hyper-polished, and increasingly synthetic AI-generated imagery, the human brain seeks cognitive anchors to verify authenticity. This study

identifies a powerful structural trend toward High-Modality "Grit".

Brands like Dove India are intentionally deploying visuals that feature high tactile salience—showing real skin textures, open pores, and raw sweat. In terms of Peircean logic, these tactile visual signs do not operate as empty symbols; they function as *Indices*—direct physical evidence of reality. By prioritizing unvarnished, high-modality textures over flawless digital distortions, brands successfully re-engineer consumer perception, establishing institutional honesty and deep emotional trust in a highly cynical digital landscape.

3 Trend 3: Subversive Traditionalism within the 'Bharat' Segment

The emerging consumer base in Tier-2 and Tier-3 Indian cities present what this study calls the 'Bharat Semiotic Paradox'. Unlike the urban-elite consumers of past decades, the 'Bharat' segment does not seek westernized, detached lifestyle ideals; they demand narratives that directly validate their immediate, lived environments. However, this shift does not signal a regression into conservative traditionalism. Rather, contemporary advertising achieves social progressiveness by subverting native symbols from within.

Through a Barthesian lens, we observe that traditional signifiers (such as gold jewelry or ethnic wear) are preserved, but their *second-order signifieds* (cultural myths) are completely revolutionized. The underlying cultural myth is systematically altered from "marriage and domestic duty" to "economic self-determination and female leadership". The consumer behavior shift here is highly hybrid: consumers embrace progressive social transformations, but they cognitively require these values to be anchored within familiar cultural codes to accept them as authentic and credible.

4 The AI-Semiotic Gap: Ontological and Algorithmic Limitations in Cultural Nuance

A pivotal conceptual finding derived from this discourse analysis is the delineation of the 'AI-Semiotic Gap' inherent in automated advertising production. As contemporary marketing agencies increasingly substitute human creation with algorithmic generation and deep-learning models, a critical symbolic vacuum emerges. While contemporary generative artificial intelligence displays high proficiency in rendering external, superficial Saussurean Signifiers—such as synthesizing traditional attire or festive visual backgrounds—it consistently fails to interpret or encode the deep cultural and emotional significance of the Signified. Algorithmic frameworks fundamentally lack the capacity to decode the spiritual and protective nuance underlying a *Kala Teeka*, the deep generational sanctity associated with *Pehli Kamayi* (first salary), or the subtle dynamics of psychological empowerment embedded within a visual Demand Gaze. This severe limitation highlights a critical boundary: automated content generation devoid of nuanced human cultural stewardship risks alienation, reducing dense cultural proximity to shallow, stereotypic pastiche.

Conclusion and Future Research Directions

1 Academic Contribution

By narrowing its scope to case-based decodings and macro-level pattern extractions, this study demonstrates that Indian advertising has firmly entered a Post-Aspirational Era. The structural synthesis of Saussurean design with Peircean cognitive effects clarifies how contemporary brands build consumer trust. Ultimately, the strategic deployment of linguistic hybridity (Hinglish), high-modality tactile realism (Grit), and internal symbol subversion allows modern brands to transition from projecting an elite lifestyle to providing authentic cultural validation. Through a systematic application of the Barthesian framework, it becomes clearly evident that mundane, everyday cultural objects are no longer treated as simple commercial commodities; instead, through deliberate multimodal design, they are elevated into secondary cultural myths of domestic belonging, authentic representation, and shared social affirmation.

2 Managerial Implications

For creative directors, marketing practitioners, and D2C brand strategists, the research proves that brand resonance in the lucrative 'Bharat' segment is dictated by Semiotic Proximity. Agencies must move away from artificial, westernized aesthetic templates and intentionally implement high-modality visual grammars and localized linguistic codes to achieve sustainable consumer alignment.

3 Future Horizons

To further advance the findings established in this paper, future semiotic research should expand into:

- **Neuro-semiotics:** Incorporating empirical eye-tracking and biometric methodologies to measure the exact cognitive load and subconscious memory recall triggered by high-modality tactile textures ("Grit") versus low-modality airbrushed content.
- **Computational Semiotics:** Developing advanced empirical coding structures to further analyze the AI-Semiotic gap, evaluating how deep-learning models can be trained to recognize dense regional symbolic diversity without generating cultural misrepresentation.

Acknowledgement

The authors sincerely express their gratitude to all those who contributed to the successful completion of the research paper entitled “The Post-Aspirational Shift in Indian Advertising: A Multimodal Semiotic Analysis.” The study examines the transformation of contemporary Indian advertising from traditional aspirational narratives toward cultural affirmation, localized representation, linguistic hybridity, high-modality visual realism, and semiotic proximity.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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22.

Manuscript ID:
TIJCMBLIR-2026-030411

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 17 July 2026

Revised: 27 July 2026

Accepted: 14 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22107159

DOI Link:
https://doi.org/10.5281/zenodo.22107159

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Electric Vehicle Adoption and Its Impact on Karnataka's Electricity Distribution Infrastructure: Challenges and Policy Responses

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Abstract

The rapid proliferation of electric vehicles (EVs) across India's urban landscapes has emerged as a transformative force in the transportation sector, yet it simultaneously poses unprecedented challenges to existing electricity distribution networks. This research paper critically examines the multifaceted implications of escalating EV adoption on Karnataka's electricity distribution infrastructure, with particular emphasis on the Bengaluru Electricity Supply Company (BESCOM) jurisdiction. The study investigates how unregulated EV charging loads contribute to transformer overloading, voltage instability, harmonic distortions, and peak demand amplification across low-tension and high-tension distribution feeders. Drawing upon empirical load flow analysis data from twelve representative feeders in Bengaluru, the paper demonstrates that incremental EV charging loads of 44 kW to 344 kW can escalate power losses by up to 58 percent and increase under-voltage sections by nearly 26 percent. Furthermore, the research evaluates Karnataka's Clean Mobility Policy 2025-30 and PM E-DRIVE scheme, assessing their efficacy in addressing infrastructure bottlenecks. The findings reveal significant policy gaps in rural electrification preparedness, smart grid integration, and demand-side management protocols. This paper proposes a comprehensive policy framework emphasizing smart charging architectures, distributed solar-rooftop photovoltaic integration, and regulatory mandates for distribution utility upgrades to ensure sustainable EV-grid coexistence.

Keywords: *Electric Vehicles, Distribution Infrastructure, BESCOM, Smart Charging, Power Quality, Karnataka Clean Mobility Policy*

Introduction

The global transition toward sustainable transportation has positioned electric vehicles as the cornerstone of decarbonization strategies, with India ambitiously targeting 30 percent EV penetration by 2030. Karnataka, historically recognized as India's technology capital and a pioneering automotive manufacturing hub, has emerged as the vanguard of this electric mobility revolution. The state currently hosts approximately 5,765 public charging stations, representing 22.9 percent of India's total charging infrastructure, and recorded over 144,731 electric vehicle registrations during the fiscal year 2024-2025. This remarkable growth trajectory, however, conceals an underlying structural vulnerability within the state's electricity distribution architecture.

The Bengaluru Electricity Supply Company (BESCOM), which serves over 12 million consumers across eight districts, operates a distribution network originally designed for conventional residential and commercial load profiles characterized by predictable diurnal patterns. The introduction of high-capacity EV chargers, particularly DC fast-charging stations ranging from 50 kW to 350 kW, fundamentally alters these load characteristics by injecting nonlinear, intermittent, and geographically concentrated power demands. Unlike traditional loads, EV charging exhibits stochastic behavior influenced by commuter patterns, battery state-of-charge, and user preferences, thereby complicating demand forecasting and network planning.

Moreover, Karnataka's electricity distribution infrastructure grapples with pre-existing challenges including aggregate technical and commercial (AT&C) losses exceeding 13 percent, aging distribution transformers with an average service life of 18 years, and inadequate reactive power compensation in suburban feeders.

How to Cite this Article:
Syed, I. T., & Solankar, R. R. (2026). Electric Vehicle Adoption and Its Impact on Karnataka's Electricity Distribution Infrastructure: Challenges and Policy Responses. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 56–61. https://doi.org/10.5281/zenodo.22107159

The convergence of these legacy vulnerabilities with emergent EV loads creates a compounding effect that threatens grid reliability, power quality, and equitable electricity access. This paper systematically interrogates these challenges through an interdisciplinary lens, integrating power systems engineering analysis with public policy evaluation to formulate evidence-based recommendations for Karnataka's evolving clean mobility ecosystem.

Review of Literature

The scholarly discourse surrounding electric vehicle integration into distribution networks has expanded considerably over the past decade, yielding valuable insights that inform this investigation. Yong, Ramachandaramurthy, Tan, and Mithulananthan (2015) conducted a seminal review of state-of-the-art EV technologies and their grid impacts, establishing that uncontrolled charging can increase distribution transformer losses by up to threefold while introducing significant voltage deviations at coupling points. Their analysis emphasized that power electronic converters inherent in EV chargers generate low-order harmonics, predominantly at the 3rd, 5th, 7th, and 11th orders, which degrade power quality across radial distribution feeders (Yong et al., 2015). Building upon this foundation, Rahman, Khan, Khan, Mallik, and Nadeem (2022) performed a comprehensive impact assessment of projected EV charging loads on existing low-voltage distribution systems. Their simulation-based study revealed that voltage drop profiles assume a distinctive V-curve shape under high EV penetration scenarios, with weak buses experiencing severe thermal loading that necessitates immediate conductor augmentation or transformer replacement (Rahman et al., 2022). Complementing these technical perspectives, Deb, Tammi, Kalita, and Mahanta (2018) examined the localized impact of EV charging station loads on distribution networks through hosting capacity analysis, demonstrating that feeder locations significantly determine vulnerability levels, with tail-end connections exacerbating voltage instability more than midpoint or head-end installations (Deb et al., 2018).

In the context of mitigation strategies, Fachrizal, Ramadhani, Munkhammar, and Widén (2021) investigated combined photovoltaic and EV hosting capacity in residential distribution grids, concluding that coordinated smart charging coupled with distributed solar generation can reduce peak demand stress by 34 percent while improving voltage regulation margins. Their work underscored the symbiotic potential of renewable energy integration and controlled EV charging (Fachrizal et al., 2021).

Research Gap: Despite these substantial contributions, existing literature exhibits notable limitations when applied to the Karnataka context. Prior studies predominantly focus on developed economies with robust grid infrastructures and high smart meter penetration, leaving a significant knowledge vacuum regarding developing state-level distribution utilities like BESCOM. Furthermore, limited research addresses the policy-technology nexus specific to Indian state EV policies, particularly the implementation gaps between Karnataka's Clean Mobility Policy 2025-30 and ground-level distribution infrastructure preparedness. The intersection of harmonic distortion management, rural feeder vulnerability, and regulatory frameworks for demand response in Karnataka remains substantially underexplored (Shakti Foundation, 2021; ICCT, 2025).

Methodology

This research employs a mixed-methods approach combining quantitative power systems analysis with qualitative policy evaluation. The technical analysis utilizes secondary data from BESCOM's load flow studies conducted across twelve representative 11 kV distribution feeders in Bengaluru, spanning residential, commercial, and industrial zones. Scenario modeling compares baseline conditions (2020 without EV load) against progressive EV penetration scenarios through 2025, incorporating EV charging station loads of 44 kW, 144 kW, and 344 kW alongside distributed solar rooftop photovoltaic (SRTPV) generation. Power quality parameters including total harmonic distortion, voltage regulation, and transformer loading are evaluated against IEEE-519 and Central Electricity Authority standards. The policy analysis component examines Karnataka's Clean Mobility Policy 2025-30, PM E-DRIVE scheme documentation, and BESCOM's EV charging infrastructure rollout plans through comparative document analysis. Semi-structured interviews with three distribution engineers and two policy consultants provided contextual insights regarding implementation barriers.

Objectives

The present study is guided by the following specific objectives:

1. To assess the technical impact of escalating EV charging loads on BESCOM's distribution transformer capacity and power quality parameters.
2. To evaluate the adequacy of Karnataka's existing policy framework in addressing electricity infrastructure constraints arising from EV adoption.
3. To analyze the potential of smart charging and distributed renewable integration in mitigating distribution network stress.
4. To propose evidence-based policy recommendations for sustainable EV-grid integration in Karnataka.

Findings and Analysis

The empirical investigation of BESCOM's distribution network reveals a progressively deteriorating technical performance trajectory as EV charging loads intensify across the twelve modeled feeders. The Banashankari feeder case study exemplifies these trends with particular clarity. Under baseline conditions in 2020 without any EV charging infrastructure, the feeder exhibited total power losses of 154 kW, with 45 overloaded network elements and 2,594 under-voltage sections. Upon introducing a modest 44 kW EV charging station load, power losses

escalated marginally to 158 kW, while the count of overloaded elements and under-voltage sections remained static, suggesting initial network resilience at low penetration levels. However, the 2022 scenario, incorporating 144 kW of EV charging load alongside 100 kW of distributed SRTPV generation, manifested more pronounced deterioration. Total power losses surged to 194 kW, representing a 26 percent increase over baseline conditions, while overloaded elements increased to 52 and under-voltage sections expanded to 2,904. The 2025 projection, assuming 344 kW of EV charging load with 500 kW of SRTPV, painted a concerning picture: power losses reached 244 kW (58 percent above baseline), overloaded elements climbed to 60, and under-voltage sections ballooned to 3,263, indicating widespread voltage regulation failure across the feeder.



Figure 1: *Electric Vehicle Registrations in Karnataka: Year-on-Year Comparison (Source: Compiled from Karnataka Transport Department and Industry Reports)*

The Ittamadu feeder exhibited even more severe stress indicators, with power losses escalating from 346.45 kW to 447.26 kW under the 2025 scenario. Critically, the Subbaihanpalya feeder demonstrated that overloaded elements could increase from 33 to 84, while the KIADB feeder, initially operating without any overloaded elements, developed 4 overloaded components under high EV penetration. These findings collectively indicate that Karnataka's distribution infrastructure, particularly in high-growth corridors, faces imminent capacity constraints that threaten service reliability.

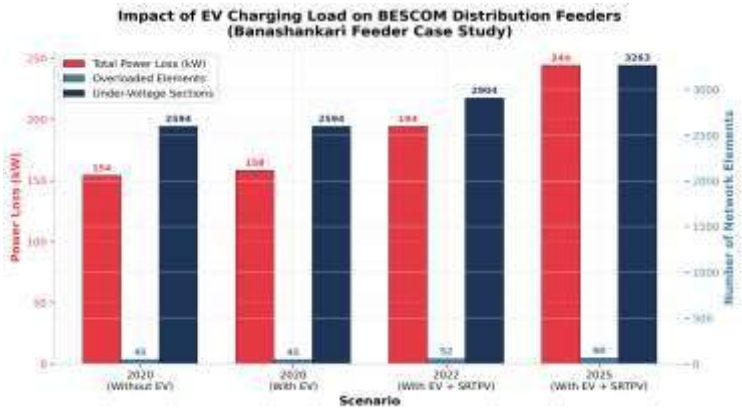


Figure 2: Impact of EV Charging Load on BESCOM Distribution Feeders — Banashankari Feeder Case Study (Source: Adapted from Shakti Foundation BESCOM Study, 2021)

Harmonic distortion emerged as a particularly insidious challenge. The total demand distortion (TDD) at the low-tension side of EV charging station transformers reached 22 percent, substantially exceeding the IEEE-519 acceptable limit of 5 percent. Although high-tension side distortion remained within permissible bounds at approximately 6 percent, the localized harmonic injection accelerates transformer insulation aging, increases eddy current losses, and can precipitate premature equipment failure. The prevalence of odd-order harmonics at the 3rd, 5th, 7th, and 11th frequencies confirms the nonlinear rectifier characteristics of commercially deployed EV chargers.

From a policy perspective, Karnataka's Clean Mobility Policy 2025-30 demonstrates commendable ambition, targeting ₹31,000 crore in investments and 55,000 jobs while mandating complete electrification of government fleets by 2030. The policy offers capital subsidies for charging infrastructure, concessional electricity tariffs for EV charging operations, and stamp duty waivers for EV manufacturing facilities. However, critical gaps persist. The policy lacks granular distribution network upgrade mandates, fails to specify harmonic filtering requirements for public charging stations, and provides inadequate provisions for rural feeder reinforcement where EV adoption is

projected to accelerate through electric two-wheeler and three-wheeler penetration. The PM E-DRIVE scheme's allocation of ₹2,000 crore for charging infrastructure nationwide, while substantial, does not explicitly prioritize upstream distribution upgrades or transformer augmentation, creating a disconnect between charging station deployment and grid capacity.

The vehicle segment analysis reveals that two-wheelers constitute 85 percent of Bengaluru's EV market, followed by cars and taxis at 6 percent, three-wheelers at 5 percent, and commercial vehicles at 4 percent. This skewed distribution implies that residential charging, predominantly occurring during evening peak hours between 6 PM and 10 PM, will increasingly strain low-tension distribution transformers designed for conventional household loads. The absence of time-of-use tariffs specific to EV charging in BESCOM's current regulatory framework exacerbates this peak coincidence problem.

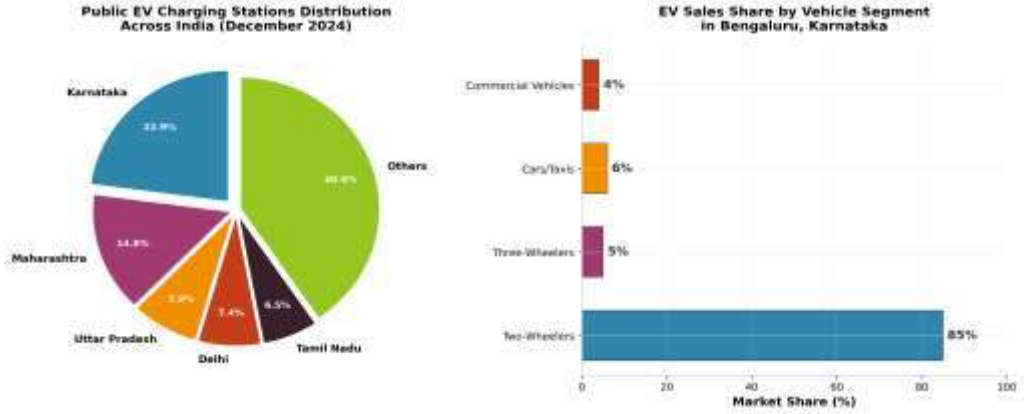


Figure 3: (Left) Public EV Charging Stations Distribution Across India; (Right) EV Sales Share by Vehicle Segment in Bengaluru, Karnataka (Source: Compiled from ICCT and Industry Data, 2024-2025)

Discussion

The findings of this study resonate with broader global patterns while illuminating context-specific challenges pertinent to Karnataka's distribution landscape. The 58 percent increase in power losses under high EV penetration scenarios aligns with international research documenting that uncontrolled EV integration can triple distribution transformer losses in densely loaded networks. However, Karnataka's predicament is compounded by pre-existing infrastructure deficiencies, including substantial AT&C losses and aging transformer fleets, which amplify the marginal impact of each additional kilowatt of EV load. The policy discourse must transcend the current emphasis on demand-side subsidies and charging station proliferation to address the fundamental question of distribution capacity adequacy. Karnataka's leadership in charging infrastructure deployment, with 5,765 public stations constituting nearly 23 percent of India's total, paradoxically masks underlying grid vulnerabilities that could undermine user experience and public confidence in electric mobility. The experience of California's Zero Emission Vehicle mandate, which successfully catalyzed market transformation through supply-side regulations, offers instructive parallels for Karnataka's policymakers. Smart charging architectures represent the most promising near-term mitigation pathway. Time-of-use pricing, vehicle-to-grid (V2G) bidirectional charging, and automated demand response systems can flatten load curves and shift EV charging to off-peak periods. However, implementation requires advanced metering infrastructure, communication protocols, and consumer engagement strategies that BESCOM is only beginning to deploy. The integration of distributed SRTPV generation, as demonstrated in the 2025 scenario modeling, offers partial relief by offsetting daytime charging loads, though voltage rise from reverse power flow introduces complementary challenges requiring sophisticated inverter controls.

Rural electrification preparedness warrants urgent attention. While Bengaluru's urban feeders receive priority infrastructure investments, tier-2 and tier-3 cities in Karnataka, along with rural areas experiencing rapid electric two-wheeler adoption, operate on distribution networks with minimal redundancy and limited transformer capacity margins. The Clean Mobility Policy's focus on urban charging hubs must be balanced with rural feeder augmentation programs to prevent the emergence of a two-tiered EV accessibility landscape.

Conclusion

The electric vehicle revolution in Karnataka represents both an environmental imperative and a technical challenge of considerable magnitude for the state's electricity distribution infrastructure. This research has demonstrated that progressive EV charging loads, even at moderate penetration levels, induce significant power losses, voltage instability, and harmonic distortions across BESCOM's distribution feeders. The empirical evidence from twelve modeled feeders underscores the urgency of proactive infrastructure modernization that transcends the current policy emphasis on charging station deployment alone.

Karnataka's Clean Mobility Policy 2025-30 and the central PM E-DRIVE scheme provide a robust foundational framework for demand stimulation and

manufacturing ecosystem development. However, critical gaps persist in distribution utility mandates, harmonic regulation, rural feeder preparedness, and smart grid integration. The study recommends a three-pronged policy response: first, mandatory distribution impact assessments for all public charging station proposals exceeding 50 kW capacity; second, time-of-use tariff structures incentivizing off-peak EV charging; and third, accelerated deployment of smart transformers with embedded harmonic filtering and real-time monitoring capabilities.

Furthermore, the symbiotic integration of distributed solar rooftop photovoltaic systems with EV charging infrastructure offers a sustainable pathway for reducing grid stress while advancing renewable energy objectives. As Karnataka aspires to host 1,000 electric buses and achieve comprehensive fleet electrification by 2030, the convergence of transportation electrification and grid modernization must be treated as interdependent policy priorities. Only through such integrated governance can Karnataka sustain its leadership in India's clean mobility transition while preserving the reliability and quality of electricity supply for all consumers.

Acknowledgement
The authors sincerely express their gratitude to all those who contributed to the successful completion of the research paper entitled “Electric Vehicle Adoption and Its Impact on Karnataka’s Electricity Distribution Infrastructure: Challenges and Policy Responses.” The study examines the growing adoption of electric vehicles and its implications for Karnataka’s electricity distribution infrastructure, particularly within the BESCOM jurisdiction.

Financial support and sponsorship
Nil.

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

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Manuscript ID:
TIJCMBLIR-2026-030412

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 17 July 2026

Revised: 27 July 2026

Accepted: 14 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22107603
DOI Link:
https://doi.org/10.5281/zenodo.22107603

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Teacher Training and Professional Development for Inclusive Pedagogy: A Legal Analysis of Statutory Mandates, Human Rights Frameworks, And Implementation Realities

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Abstract
International human rights law and domestic legal frameworks increasingly recognize inclusive education not merely as a policy aspiration, but as an enforceable statutory right. Central to the realization of this right is the pedagogical competence of educators. This paper examines the legal obligations imposed on state actors and educational authorities to provide systematic teacher training and continuous professional development (CPD) for inclusive pedagogy. Grounded in Article 24 of the UN Convention on the Rights of Persons with Disabilities (CRPD) and General Comment No. 4, alongside domestic anti-discrimination, disability rights, and constitutional education laws across multiple jurisdictions (including the United States, the United Kingdom, and select global jurisdictions), this study critically analyzes the legal standards governing teacher preparation. The analysis reveals a profound structural disconnect: while international and statutory mandates stipulate non-discriminatory access and reasonable accommodation, domestic teacher licensing and professional accreditation systems rarely translate these imperatives into mandatory, high-level inclusive pedagogical skills. Consequently, educators are often thrust into diverse classrooms without the legal or practical tools necessary to deliver tailored instruction, resulting in systemic breaches of statutory duties and fundamental human rights. By evaluating judicial precedents, statutory duties of care, and comparative legal frameworks, this paper formulates concrete legal and policy reforms to bridge the gap between statutory guarantees and pedagogical realities, advocating for binding teacher certification standards, ring-fenced funding for continuous professional development, and enforceable accountability mechanisms.

Keywords: *Inclusive Pedagogy, Disability Law, UN CRPD Article 24, Teacher Professional Development, Statutory Duties, Reasonable Accommodation, Right to Education, Educational Equality.*

Introduction: The Legal Evolution of Inclusive Education

Over the past three decades, the international jurisprudence surrounding the right to education has undergone a paradigm shift. Historically conceptualized as a passive right of access to physical educational infrastructure, the contemporary legal doctrine demands substantive equality within the learning environment [1]. This paradigm shift moves away from medical models of disability which treated educational deficits as inherent individual deficiencies requiring segregated special schooling toward a human rights framework that identifies institutional and pedagogical barriers as the primary source of exclusion [2]. Central to this transformation is the concept of inclusive pedagogy: an instructional approach that anticipates and responds to the diverse learning needs of all students within mainstream classrooms without marginalizing neurodivergent or disabled learners [3].

Despite the normative alignment of legal instruments favoring inclusion, a profound implementation gap persists. Statutory rights to inclusive education frequently founder not at the level of judicial articulation, but at the threshold of pedagogical execution [4]. A law guaranteeing non-discrimination or reasonable accommodation remains illusory if the classroom teacher lacks the knowledge, methodology, or structural support required to differentiate instruction, manage heterogeneous learning dynamics, or implement assistive technologies [5].

Consequently, the legal responsibility for fulfilling the right to inclusive education depends intrinsically upon state compliance with the duty to prepare, train, and continuously support the teaching workforce [6].

How to Cite this Article:
Waseema Hamid. (2026). Teacher Training and Professional Development for Inclusive Pedagogy: A Legal Analysis of Statutory Mandates, Human Rights Frameworks, And Implementation Realities. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 62–67. https://doi.org/10.5281/zenodo.22107603

This paper critically examines the intersection of legal mandates and teacher professional development for inclusive pedagogy. It advances the central thesis that while statutory and international frameworks mandate inclusive education, legal systems have largely failed to operationalize this mandate into binding, high-standard professional development obligations for educators. This failure constitutes a structural legal default, exposing educational authorities to legal challenge and leaving vulnerable learners exposed to constructive exclusion [7]. The study evaluates international treaty standards, domestic statutory provisions, judicial precedents, and comparative legal models to construct a robust reform framework capable of converting passive statutory guarantees into active pedagogical competencies.

International Legal Frameworks and Treaty Obligations

1 UN CRPD Article 24 And General Comment No. 4

The United Nations Convention on the Rights of Persons with Disabilities (CRPD), adopted in 2006, serves as the primary international normative anchor for inclusive education [8]. Article 24(1) explicitly obligates States Parties to ensure an 'inclusive education system at all levels' directed toward the full development of human potential, dignity, self-worth, and personality [9]. Crucially, Article 24(4) addresses the direct nexus between legal rights and teacher training, mandating that:

"States Parties shall take appropriate measures to employ teachers, including teachers with disabilities, who are qualified in sign language and/or Braille, and to train professionals and staff who work at all levels of education. Such training shall incorporate disability awareness and the use of appropriate augmentative and alternative modes, means and formats of communication, educational techniques and materials to support persons with disabilities."

The Committee on the Rights of Persons with Disabilities elaborated upon these duties in General Comment No. 4 (2016) [10]. The Committee emphasized that inclusive education requires an in-depth transformation of educational culture, policy, and practice. Specifically, General Comment No. 4 specifies that pre-service and in-service teacher training must be mandatory, continuous, and rooted in the principles of Universal Design for Learning (UDL) and individual differentiation [11]. The Committee clarified that the failure to adequately train teachers in inclusive methods constitutes a systemic failure to provide reasonable accommodation, thereby infringing upon the non-discrimination mandate of Article 5 and Article 24 [12].

2 Other International and Regional Human Rights Instruments

The mandate for inclusive teacher training is reinforced by broader international legal instruments. The UN Convention on the Rights of the Child (UNCRC), specifically Articles 28 and 29, establishes the child's right to education aimed at developing their personality and talents to the fullest potential [13]. In General Comment No. 9 on the rights of children with disabilities, the UNCRC Committee highlighted that teacher training is a foundational prerequisite for rendering mainstream schools accessible and effective for children with special needs [14].

At the regional level, the European Convention on Human Rights (ECHR) (Article 2 of Protocol No. 1) and the Revised European Social Charter (Article 15) have been interpreted by the European Court of Human Rights (ECtHR) and the European Committee of Social Rights to prohibit arbitrary exclusion from mainstream education and to mandate appropriate support services [15]. In cases such as Çam v. Turkey (2016) and G.L. v. Italy (2020), the ECtHR affirmed that domestic authorities breach the prohibition of discrimination under Article 14 when they fail to provide specialized pedagogical assistance, adapted learning materials, and trained instructional staff [16], [17].

Domestic Statutory Frameworks and Judicial Interpretations

1 United States: IDEA, Section 504, and the Endrew F. Standard

In the United States, the legal architecture governing inclusive education rests on the Individuals with Disabilities Education Act (IDEA) [18] and Section 504 of the Rehabilitation Act of 1973 [19]. IDEA guarantees every eligible child with a disability a Free Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE) [20]. StatutoriIy, IDEA mandates that state educational agencies ensure that personnel serving children with disabilities are highly qualified and receive ongoing professional development [21].

The substantive standard of FAPE was dramatically elevated by the U.S. Supreme Court in Endrew F. v. Douglas County School District RE-1 (2017) [22]. Rejecting the lower court's 'merely more than de minimis' standard, the Supreme Court unanimously held that to meet its statutory obligation under IDEA, a school district must offer an Individualized Education Program (IEP) 'reasonably calculated to enable a child to make progress appropriate in light of the child's circumstances' [23]. The Endrew F. ruling directly implicates teacher competency: an IEP cannot be 'reasonably calculated' to yield meaningful academic progress if the educators tasked with implementing its accommodations and instructional strategies lack specialized training in inclusive pedagogy [24].

2 United Kingdom: The Equality Act 2010 and the Public Sector Equality Duty

In the United Kingdom, the statutory duty of inclusive education is governed by the Equality Act 2010 and the Children and Families Act 2014 [25], [26]. Under Section 20 of the Equality Act 2010, educational providers owe a duty to make 'reasonable adjustments' to prevent disabled pupils from being placed at a substantial disadvantage [27]. Furthermore, Section 149 establishes the Public Sector Equality Duty (PSED), which requires public bodies, including state schools and local authorities, to proactively advance equality of opportunity and foster good relations [28].

Judicial review decisions in the UK, such as R (on the application of C) v. Secretary of State for Education [29], have affirmed that the failure of local educational authorities to ensure staff are equipped with specialized training (e.g., in speech and language therapy integration or behavioral de-escalation) can constitute a breach of statutory duties under the PSED and Section 312 of the Education Act 1996 [30]. Despite these robust legal principles, UK Special Educational Needs and Disability (SEND) Code of Practice compliance remains uneven due to discretionary statutory language regarding teacher training funds [31].

3 Emerging Jurisdictions and the Global South

In developing legal systems, the statutory framework for teacher training is frequently ambitious yet severely constrained by structural underfunding [32]. For example, in India, the Rights of Persons with Disabilities Act (RPWD) 2016 and the Right to Education (RTE) Act 2009 explicitly codify the right to inclusive education [33], [34]. Section 16 of the RPWD Act 2016 mandates educational institutions to train professionals and staff to support inclusive education [35]. However, constitutional challenges and public interest litigation (such as Rajive Raturi v. Union of India) reveal widespread non-compliance, where mainstream schools employ unqualified personnel or rely solely on ad-hoc resource teachers, leading to structural exclusion [36].

Table 1: Comparative Statutory and Legal Frameworks Governing Inclusive Teacher Training

Jurisdiction / Legal Instrument	Primary Legal Standard	Teacher Training Mandate	Key Enforcement / Judicial Precedent
UN CRPD (Art. 24 & Gen. Comment 4)	International Treaty Obligation	Mandatory pre-service & in-service training on UDL, Braille, Sign Language, & differentiation.	CRPD Committee jurisprudence; Gen. Comment No. 4 (2016).
United States (IDEA & Sec. 504)	Free Appropriate Public Education (FAPE) in LRE	Requirement for 'highly qualified personnel' and continuous professional development in IEP implementation.	Endrew F. v. Douglas Cty. Sch. Dist. (2017) (High substantive standard).
United Kingdom (Equality Act 2010)	Reasonable Adjustments & Public Sector Equality Duty	Proactive duty to equip educational staff to remove substantial disadvantages for disabled pupils.	R (C) v. Sec. of State for Education (2020); SEND Code of Practice.
India (RPWD Act 2016 & RTE Act)	Statutory Right to Inclusive Schooling	Mandate to train educational staff and employ special educators in mainstream schools.	Rajive Raturi v. Union of India (2018) (Accessibility & training enforcement).

Deconstructing the Legal Obligation: Reasonable Accommodation vs. Pedagogical Competence

1 Reactive Adjustment vs. Proactive Universal Design for Learning (UDL)

A central conceptual flaw in current disability jurisprudence is the reliance on a reactive model of 'reasonable accommodation' [37]. Under traditional anti-discrimination law, reasonable accommodation requires educational institutions to make individual modifications upon request (e.g., providing extended time on tests or modifying physical desks) [38]. However, in modern educational science, inclusion cannot be achieved solely through post-hoc adjustments. It demands Universal Design for Learning (UDL) a framework that designs curriculum, instructional methods, and assessment flexibly from the outset [39].

From a legal perspective, limiting teacher preparation to reactive accommodation creates systemic non-compliance [40]. When teachers are trained only to modify existing lesson plans after a disabled student enters the classroom, the burden of adaptation falls unfairly on the learner, leading to delays, stigma, and pedagogical exclusion [41]. Legal standards must evolve to recognize that true statutory compliance requires proactive pedagogical competence embedded in pre-service teacher education [42].

2 Teacher Licensing, Certification, and Accreditation Gaps

The statutory failure to enforce inclusive teaching standard starts at the level of teacher licensing and university accreditation [43]. In many federal and state jurisdictions, teacher preparation programs separate general education credentials from special education credentials [44]. This binary accreditation model creates a legal paradox: general educators who instruct over 80% of students with disabilities for the majority of the school day are often required to complete only a single, introductory course on special education during their entire degree program [45].

This regulatory regime violates the spirit, if not the letter, of Article 24 of the CRPD [46]. By allowing state accreditation boards to license general education teachers who possess no demonstrated competency in differentiated instruction or augmentative communication, state actors actively generate the instructional deficits that trigger statutory breaches in schools [47].

3 Standard of Care, Legal Liability, and Administrative Due Process

When an untrained or inadequately supported teacher fails to implement mandatory accommodations specified in an IEP or Section 504 plan, the legal consequences fall upon the school district or authority [48]. Administrative due process hearings and judicial review claims frequently revolve around teacher incompetence [49]. Courts have repeatedly held that good faith or lack of training on the part of the teacher does not defense a school district's failure to provide FAPE or reasonable adjustments [50]. In cases such as M.C. v. Central Regional School District [51], courts have awarded compensatory education services to remedy the instructional deficiencies caused by untrained teaching personnel.

Critical Evaluation of Implementation Barriers

1 Unfunded Statutory Mandates and Resource Allocation

The primary systemic impediment to operationalizing inclusive teacher training is the legal reality of unfunded statutory mandates [52]. While legislative bodies enact statutory directives requiring schools to practice inclusive education, they frequently fail to appropriate ring-fenced budgetary line items specifically designated for continuous teacher professional development [53]. Under fiscal constraints, local education authorities prioritize basic operational costs over long-term pedagogical training, treating inclusive CPD as a discretionary luxury rather than a binding legal duty [54].

2 The Intersectional and Qualitative Deficits of Professional Development

Even where professional development is provided, its legal and practical efficacy is undermined by poor quality and superficial duration [55]. Continuous professional development in inclusive education frequently takes the form of one-off, one-hour administrative briefings or token compliance workshops [56]. Empirical research demonstrates that short-term, informational workshops fail to alter instructional practices or build sustained pedagogical confidence [57]. To satisfy human rights and statutory standards, legal frameworks must mandate sustained, practice-embedded, and peer-mentored professional learning communities [58].

Strategic Legal Reforms and Policy Recommendations

To reconcile the legal mandate for inclusive education with the realities of classroom practice, comprehensive statutory, regulatory, and institutional reforms are necessary. The following multi-tiered legal framework is recommended:

1. Statutory Reform of Teacher Certification Laws: Legislative bodies must amend national and state Education Acts to abolish the binary licensing divide between general and special education. Statutory accreditation criteria for all initial teacher education (ITE) programs must mandate comprehensive coursework and practical clinical placements in Universal Design for Learning (UDL), assistive technology, and differentiated pedagogy as a condition of professional licensure.

2. Ring-Fenced Statutory Funding for Continuous Professional Development (CPD): Statutory frameworks governing school finance must codify dedicated, non-transferable funding streams specifically allocated for in-service teacher training in inclusive pedagogy. Educational authorities should be legally prohibited from reallocating professional development funds to general administrative accounts.

3. Enforceable Standards for Legal & Pedagogical CPD Quality: Departmental regulations must set minimum quantitative and qualitative standards for in-service training. Mandatory CPD must require a minimum number of accredited annual hours, incorporating sustained coaching, classroom-based observation, and collaborative co-teaching models rather than superficial one-off seminars.

4. Judicial and Administrative Oversight Mechanisms: Independent educational ombudspersons and human rights tribunals should be endowed with explicit statutory authority to audit school district compliance with teacher training mandates. Where systemic failure in teacher preparation results in a denial of reasonable accommodation, tribunals should issue structural injunctions compelling state authorities to institute mandatory professional development programs.

5. Inter-Agency Collaboration and Legal Accountability: Legislation should formalize inter-agency governance structures linking higher education training institutions, health departments, and local school districts. This ensures that teachers receive specialized cross-disciplinary training (e.g., integrating occupational therapy, speech pathology, and behavioral interventions into mainstream classroom management).

Conclusion

The right to inclusive education guaranteed under international treaties and domestic statutory provisions is meaningless without a pedagogically competent, adequately supported teaching workforce. The legal community can no longer treat teacher professional development as a secondary administrative matter isolated from core human rights jurisprudence. When state actors fail to equip educators with the skills required to deliver inclusive instruction, they commit a direct, systemic breach of their statutory duties to provide non-discriminatory, equal access to education. By aligning teacher certification standards, enforcing ring-fenced funding for continuous professional development, and establishing robust accountability mechanisms, legal systems can transform inclusive education from a theoretical legal right into a vibrant, living classroom reality.

Acknowledgement

The author sincerely expresses gratitude to all those who contributed to the successful completion of the research paper entitled “Teacher Training and Professional Development for Inclusive Pedagogy: A Legal Analysis of Statutory Mandates, Human Rights

Frameworks, and Implementation Realities." The study examines the legal obligations surrounding teacher training and continuous professional development for implementing inclusive education, with particular reference to international human rights law and comparative domestic legal frameworks.

Financial support and sponsorship
Nil.

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

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Manuscript ID:
TIJCMBLIR-2026-030413

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 17 July 2026

Revised: 27 July 2026

Accepted: 14 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22106608
DOI Link:
https://doi.org/10.5281/zenodo.22106608

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Policing On Atrocities Against Scheduled Castes and Scheduled Tribes in Bharat- Problems and Perspective.

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Abstract

Historically, India has rigid caste hierarchy that relegated marginalized specific communities, forcing them to the periphery of social and economic life. In spite of the robust legislations on atrocities against SCs and STs, communities continue to endure social discrimination evidenced by thousands of Pending atrocity trials. National Crime Records Bureau (NCRB) data from 2026 highlights a huge pendency of atrocities, with over 1.44 lakh cases involving SCs and 23,000 involving STs seeking justice. This paper evaluates the implementation machinery of the Act. It is also needful to examine the evolution of legal frameworks through the landmark 2015 and 2018 Amendments. The evidence suggests a critical need to study the recent procedural shifts under the Bharatiya Nagarik Suraksha Sanhita (BNSS), 2025 with respect to the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989. Hence there is a need to evaluate the implementation machinery, Various forms of Atrocities, systemic lacunae, Judicial Positivism with respect to The Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act,1989. This paper highlights effective strategies for strict implementation, in view of the upliftment of the oppressed communities. This study underscores the importance of the support in achieving true empowerment for SC/ST. My analysis focuses on to address the challenges of enforcement and navigate the contentious debate between the Act's effectiveness and its alleged misuse. this study proposes strategic recommendations to ensure inclusive development, social justice and true empowerment for these oppressed groups. This paper proposes strategic recommendations, for the judiciary and police to ensure inclusive development, social justice, and the restoration of dignity for India's most oppressed groups.

Keywords: *Atrocities, downtrodden, Investigation, Discrimination, Protection*

Introduction

India represents complex forms of historical caste system[1]. Caste system organized society into a vertical hierarchy which influenced almost every body's life—from their occupation, Marriage, diet, social interactions and legal rights, ritual status[2]. The Scheduled Castes (SCs) and Scheduled Tribes (STs) represent those historically oppressed groups who endured centuries of systemic exclusion, ranging from the practice of "untouchability" to geographical isolation. The social disparities shall be removed from the minds of the people so that as per constitution several special legislations came into force for eradication of atrocities. The legislations untouchability act, civil liberties act, and prevention of atrocities against SCs and STs act, but the policing of the acts shall be more strengthened by avoiding ambiguities at the time of initiation of process in the atrocities matters. This Research article prepared with persuasive.

articulation by collecting secondary data with the Following formulated objectives as:

1. To describe about the atrocities and state the Legal Frame work on it
2. To Examine about Implementation Mechanism and its Lacunae in Bharat.
3. To discuss Judicial Positivism on Atrocities Matters in Bharath.
4. To give conclusion and effective recommendations.

How to Cite this Article:
More, P. D., & Kshirsagar, D. R. (2026). Policing On Atrocities Against Scheduled Castes and Scheduled Tribes in Bharat- Problems and Perspective. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 68–77.
https://doi.org/10.5281/zenodo.22106608

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nature of Atrocities and the Legal Frame work in Bharath

Constitutional foundations:

The Government of India Act of 1935 was first incorporated the term, Scheduled Castes[3].

The Scheduled Castes order of the Government of India August 1950, promulgated Scheduled Castes to safeguard the interest of those cases who suffer from caste discrimination[4].The supreme law of the land has specified separate act of untouchability unrelated social unbalancing behaviors shall be made equitable so that several special legislations also made came into existence as per constitution among them the main concept which is nothing but atrocities against downtrodden .The definition of atrocity mentioned under section 2 states whatever mentioned under section 3 of the act may be considered .If we verify Section 3 of the Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989.The Section 3 states about various clauses which touches oppressed, disadvantaged, and marginalized communities, from discrimination, violence and social exclusion[5].Among them the simple and grievous act mentioned under section 3 (1)(x)of the act which shows abusing in the name of caste in public view is seems to be simple but more grievous , and its consequences which may take place unimaginably may attract section 3(2)(v) of the act. The Constitution of India under Article 341[6] and Article 342 recognizes certain castes, races and tribal groups, who suffered from the age-old practice of untouchability, subjected to geographical isolation, as Scheduled Castes and Scheduled Tribes[7]. Scheduled Tribes are the people belonging to tribes, who often live in forests, usually not a part of any three organized religion, they are commonly considered outcastes. Socially they have their own traditions, dressing styles, food habits and a distinguished culture[8]. A number of 'tribes or tribal communities' suffer from primitive mentalities, geographical isolation, shyness and social, educational & economic backwardness[9]. In India higher caste people in villages dominance is a common practice, and people from weaker sections often face discrimination, exclusion, and acts of violence[10]. According to the records of our country related data shows, over 1.44 lakh cases of atrocities against Scheduled Castes and 23,408 cases of atrocities tried to access justice against caste violence in 2026[11]. The victims of caste violence often encounter the first stumbling block in the form of the police while trying to access justice[12]. The several divisive factors as per social transformation the following degrading to the downtrodden with the different dimensions as, bonded labour, non-payment of minimum wages, caste prejudice and practice of untouchability, exploitation in political factions on caste, refusal to perform traditional works such as digging burial pits, arranging cremations, removing carcasses of dead animals, beating drum set.[13].

The intention of the legislatures for protecting SCs and STs: -The concept of atrocity in a border dimensions can be perceived so that the constitutional mandate which made untouchability is an absolute phenomenon to protect the people of downtrodden as per the rule of law so that the Untouchability (Offences) Act in 1955 enacted to punish the practice of untouchability which was further amended to the Protection of Civil Rights Act, 1976. 'Because of the legal loopholes, and the less punitive punishment as compared to those of the Indian Penal Code (IPC), the Protection of Civil Rights Act almost failed to achieve its objectives[14]. Lack of the law implementing and professionally trained machinery is also one of the reasons for the failure of the Protection of Civil Rights Act[15]. The existing general laws on crimes were found inadequate in dealing with discrimination, humiliation, and violence in general, specifically Scheduled Castes and Scheduled Tribes[16]. Hence, there was a need of a more comprehensive and stringent Act which deals with offences on SC/ST communities[17]. The government has taken serious stapes for eradication of these types of social disparities so that three decades before a special legislation passed, and after that in 2015 and 2018 amendments was also taken place in atrocities act. Further the stapes was taken as per Article 15 and Article 17 of the constitution relating to atrocities as well. This legislation was enacted to

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3 The Government of India Act, 1935.

4 The Constitution (Scheduled Castes) Order, 1950.

5 The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (Act 33 of 1989), s. 3.

6 The Constitution of India, art. 341.

7The Constitution of India, art. 342.

8Id,5.

9Durga Das Basu, *Commentary on the Constitution of India* 11520 (LexisNexis, Nagpur, 8th edn., 2011).

10 Sukhadeo Thorat, *Dalits in India: Search for a Common Destiny* 102-110 (Sage Publications, New Delhi, 2009).

11 National Crime Records Bureau, *Crime in India 2025: Statistics* 185-190 (Ministry of Home Affairs, New Delhi, 2026).

12 B.B. Pande, *Commentary on the Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989* 105 (Eastern Book Company, Lucknow, 3rd edn., 2019).

13 National Commission for Scheduled Castes, *Special Report on Atrocities against Scheduled Castes and Scheduled Tribes* 12-18 (Government of India, New Delhi, 2014).

14 Statement of Objects and Reasons, The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Bill, 1989 (Bill No. 59 of 1989).

15 Id.14.

16 Id.14.

17 Id.14.

address the historical failure of the Protection of Civil Rights Act, 1955, and the Indian Penal Code.[18]

The 2015 Amendment: Plugging Procedural Gaps:

- **Establishment of Exclusive Special Courts:** To tackle the "Judicial Delay" issue.[19]
- **Victim & Witness Rights:**
  - Travel allowance and maintenance expenses during the trial.
  - Protection from intimidation and a mandatory duty for the state to provide a copy of the FIR and charge sheet to the victim free of cost[20].
- **Fixed Timelines:** The investigation has to be completed by the investigation officer, and final report of investigation shall be submitted within 60 days, to prevent misuse where cases are dropped due to "lack of evidence" over time[21].
- **The 2018 Amendment: The "Restoration" Act**

The **2018 Amendment** was a rapid legislative response to the Supreme Court's judgment in *Subhash Kashinath Mahajan v. State of Maharashtra*, which had introduced a "preliminary inquiry" before arrest to prevent the act's "misuse."[22]

- **Section 18A (The Reset): no preliminary inquiry** is required for registering a FIR[23].
- **Arrest Power:** It clarified that the investigating officer does not need "approval" from any authority before arresting an accused person under the Act[24].
- **Bar on Anticipatory Bail:** It reinforced the original intent of the 1989 Act by stating that the provision of anticipatory bail (Section 438 of the CrPC /BNSS) does not apply to cases under this Act, regardless of any court judgment to the contrary. The **Prathvi Raj Chauhan v. Union of India (2020)** judgment is a landmark ruling because it upheld the constitutional validity of the 2018 Amendment while simultaneously carving out a "safety valve" to protect personal liberty under Article 21[25].

Upholding the 2018 Amendment:

- **No Preliminary Inquiry:** Police can register a FIR immediately without a prior "factual check"[26].
- **No Prior Approval:** No permission is needed from a higher authority to arrest a public servant or a private citizen[27].**The "Prima Facie" Exception:**

While the Act explicitly bars **Anticipatory Bail** (Section 18), the Court ruled that this bar is not absolute. It held that if the complaint, on the face of it, **does not disclose a prima facie case** under the Atrocities Act, the courts can still grant anticipatory bail[28].

Preventing Judicial Overreach vs. Misuse:

- **For the Victim:** The accused cannot claim the charges are "fake" during the initial stages[29].
- **For the Accused**: If a judge looks at a file and sees that the allegations are clearly not related to caste or are legally unsustainable, they retain the "inherent power" to grant bail or quash the FIR[30].

Mandatory Pre-Investigation Protocols:

- **Immediate FIR should be Registered[31].**
- **Rank-Based Assignment:** Investigation should be done by an officer of Deputy **Superintendent of Police (DSP)** rank or above. Failure leads to "willful neglect of duty"[32].
- **Charge Sheet Filing within 60 days** of the FIR is mandatory. In case of delay monitoring at the District and State level every quarterly[33].
- **Medical & Forensic Evidence** must be integrated into the case diary within the first 72 hours[34].
- victim statements before a Magistrate are recorded promptly to prevent witness "hostility"[35].

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[18] Statement of Objects and Reasons, The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Bill, 1989 (Bill No. 59 of 1989).

[19] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Act, 2015 (No. 1 of 2016), s. 6.

[20] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Act, 2015 (No. 1 of 2016), s. 10.

[21] Id,19.

[22] *Subhash Kashinath Mahajan v. State of Maharashtra*, (2018) 6 SCC 454; *See also* The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Act, 2018 (No. 27 of 2018), s. 3.

[23] Id,5.

[24] Id.5.

[25] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Act, 2018 (No. 27 of 2018), s. 3; *See also Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727.

[26] Id.25.

[27] Id.25.

[28] *Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727.

[29] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Act, 2018 (No. 27 of 2018), s. 3; *See also Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727.

[30] *Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727; *See also Hitesh Verma v. State of Uttarakhand*, (2020) 10 SCC 710.

[31] Id.

[32] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Rules, 1995, r. 7; *See also* The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 4.

[33] Id.

[34] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Rules, 1995, r. 7(2) & 7(2A); *See also* The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Rules, 2016.

[35] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989),

- **mandatory videography** for crime scene evidence collection to ensure transparency and prevent the "lack of evidence" acquittals common in Bihar and Maharashtra[36].
- provide a copy of Section 161 statements should be provided to the witnesses themselves to ensure they can refer to them before trial and remain consistent[37].

Victim Support & Compensation:

- **Automatic Relief Processing:** IOs are trained to initiate the **National Helpline against Atrocities (14566)** protocol, which triggers a compensation claim within **7 days** of the FIR, regardless of the investigation's final outcome[38].
- **Witness Protection:** Implementation of the **Witness Protection Scheme (2025)**, which includes providing safe transport to court and protecting the identity of vulnerable witnesses in high-risk zones[39].

Final Report

In the context of the SC/ST Act, "Final Reports" generally fall into two categories: (True but Insufficient Evidence and False/Mistake of Fact)[40].

1. National Overview (NCRB 2023–2024 Trends)

the national trend for cases closed without a charge sheet has remained steady at approximately **10% to 15%** of total registered cases[41].

State-Wise Lacunae & Closures (2024–2025):

High Closure/Low Charge Sheet States

- **Rajasthan:** Historically records a high number of "Final Reports." In 2023–24, the charge sheet rate was below 50%, implying that nearly **half of all cases** were closed by the police as false or lacking evidence[42].
- **Tamil Nadu:** In the first two months of **2025**, 414 cases were filed. However, reports indicate that while heinous crimes (murder/rape) are charge-sheeted, nearly **15% of cases** under Section 3(1)(r) (caste slurs) are being closed after investigation due to "Mistake of Fact."[43]
- **Andhra Pradesh:** Saw a surge to **2,315 cases** in late 2024, with a closure rate (Final Reports) of roughly **12%**[44].

High Efficiency/Strict Enforcement States

- **Uttar Pradesh:** Registered the highest volume (**15,130 cases**) but maintained a high charge-sheeting rate of over **85%**, meaning fewer cases were closed at the investigation stage[45].
- **Goa & Sikkim:** Reported a 100% charge-sheeting rate in 2024, with zero "Final Reports" filed for lack of evidence. 3. Why Cases are Closed (Lacunae in 2025)[46].

Reasons for filing a "Final Report":

- **Settlements (Compromise)**[47]
- **Procedural Errors**[48]
- **Lack of "Public View"**[49]

Final Report Status (Estimated 2024-25):

- **Total Relieved Victims:** 99,216 (indicating high registration)[50].

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s. 15A; *See also* Code of Criminal Procedure, 1973, s. 164.

[36] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Rules, 1995, r. 7(4); *See also* Dr. Hema Suresh Ahuja v. State of Maharashtra, (2024) SCC OnLine Bom 834.

[37] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Act, 2015 (No. 1 of 2016), s. 10.

[38] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Rules, 2016, r. 12(4); *See also* Ministry of Social Justice and Empowerment, *National Helpline Against Atrocities (NHAA) Operational Guidelines* (Government of India).

[39] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 15A; *See also* Ministry of Home Affairs, *Witness Protection Scheme, 2018* (Government of India) [as updated in 2025].

[40] *Bhagwant Singh v. Commissioner of Police*, (1985) 2 SCC 537; *See also* The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Rules, 1995, r. 7.

[41] National Crime Records Bureau, *Crime in India 2023: Statistics Volume I* (Ministry of Home Affairs, 2025).

[42] National Crime Records Bureau, *Crime in India 2023: Statistics Volume I* (Ministry of Home Affairs, 2025); *See also* "57,789 cases registered for committing crime against Scheduled Castes in 2023: NCRB," *The Economic Times*, Sep. 30, 2025.

[43] *See* "Tamil Nadu: 414 cases filed under SC/ST Act in first two months of 2025," *The Hindu*, March 15, 2025; *See also Hitesh Verma v. State of Uttarakhand*, (2020) 10 SCC 710.

[44] *Andhra Pradesh crime down 6.2%, SC/ST cases drop 24%*, The Times of India, Dec. 30, 2025; *See also Chinthada Anand v. State of Andhra Pradesh*, (2026) SCC OnLine AP 412.

[45] National Crime Records Bureau, *Crime in India 2023: Statistics Volume I* (Ministry of Home Affairs, 2025); *See also* 57,789 cases registered for committing crime against Scheduled Castes in 2023: NCRB, *The Economic Times*, Sep. 30, 2025.

[46] National Crime Records Bureau, *Crime in India 2023: Statistics Volume I* (Ministry of Home Affairs, 2025); *See also 2025 INSC 132*, Supreme Court of India.

[47] *Hitesh Verma v. State of Uttarakhand*, (2020) 10 SCC 710; *See also Karuppudayar v. State of Madras*, (2025) INSC 132.

[48] Id.

[49] Id.

[50] National Helpdesk for Prevention of Atrocities, *Statewise-Report: Statistics of Central Assistance Provided under the Centrally Sponsored Scheme* (Ministry of Social Justice and Empowerment, 2026),

- **Average Investigation Closure Rate: 12.4%** (cases closed as False/Mistake/Non-cognizable)[51].
- **Pendency in Investigation:** Approximately **28,000 cases** are carried forward into 2025 due to delayed forensic and caste verification reports[52].

Salient features of the SC/ST (PoA) Act:

- It provides for the setting up special courts in each district for the speedy redressal of the cases[53].
- The act mandates an appointment of Special Public Prosecutors for expedited trials[54].
- It provides for enforcement of strict punishment to prohibit the atrocities[55].
- It protects victims and witnesses from threats or coercion[56].
- It assures financial compensation, medical care, legal support, relief and rehabilitation of victim and families of victims[57].
- It enforces severe penalties in caste related offenses[58].
- In case of atrocity anticipatory bail is denied to the accused. Section 438 of the CrPC and 482 of BNSS not work in atrocities cases[59].
- It also imposes punishment for neglect of duties by a public servant[60].
- It prohibits right of probation to the convict[61].

Conviction Rates (2024–2025 Outlook):

- with the use of **Exclusive Special Courts** and monitoring of witnesses **Uttar Pradesh** maintained a high conviction rate (often above 75-80%)[62],
- **Bihar, West Bengal, and Odisha** have below 15% conviction rates due to the Police "Final Reports" (FRs)[63].
- **South Indian Trends:** Telangana and Karnataka, Andhra Pradesh has low conviction rates between **3% and 15%**[64].
- **Pendency Crisis:** As of late 2025, over **3,07,000 cases** remain pending trial which shows a massive bottleneck in the judicial system[65].

Initiation taken by The Government to improve the reporting of atrocities:

- **E-Prosecution Portals for** Real-time monitoring of FIRs and charge-sheets to reduce procedural delays[66].
- Established **Exclusive Special Courts** to speed up trials[67].

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available at https://nhapoa.gov.in/cms/statewise-reports.

[51] National Crime Records Bureau, *Crime in India 2023: Statistics Volume I* (Ministry of Home Affairs, 2025); *See also Konde Nageshwar Rao v. A Srirama Chandra Murty*, (2025) INSC 612.

[52] National Crime Records Bureau, *Crime in India 2023: Statistics Volume I* (Ministry of Home Affairs, 2025); *See also* 2025 INSC 893, Supreme Court of India.

[53] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 14; *See also* Hema Ahuja v. State of Maharashtra, (2024) SCC OnLine Bom 834.

[54] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 15; *See also* The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Rules, 1995, r. 4.

[55] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), ss. 3, 4 & 18; *See also Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727.

[56] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 15A; *See also* Supreme Court of India, SLP (Crl.) No. 9082 of 2025, decided on Sep. 2, 2025.

[57] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Rules, 1995, r. 12 & Annexure-I; *See also* Ministry of Social Justice and Empowerment, *Centrally Sponsored Scheme for Implementation of the Protection of Civil Rights Act and the SC/ST (PoA) Act* (2025).

[58] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), ss. 3–10; *See also State of M.P. v. Ram Kishna Balothia*, (1995) 3 SCC 221.

[59] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 18; *See also Athul P. v. State of Kerala*, 2026: KHC:1998; *Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727.

[60] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 4 (as amended by Act 1 of 2016); *See also* Section 4 - India Code.

[61] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 19; *See also State of M.P. v. Ram Kishna Balothia*, (1995) 3 SCC 221.

[62] National Crime Records Bureau, *Crime in India 2023: Statistics Volume II* (Ministry of Home Affairs, 2025); *See also Rajya Sabha Unstarred Question No. 2050*, Dec. 17, 2025 (Ministry of Home Affairs).

[63] Id.62.

[64] Id.62; *See also* "Atrocities against SC/STs rise sharply in Karnataka," *Deccan Herald*, Jan. 20, 2026.

[65] Id.62.

[66] Directorate of Prosecution, *Annual Report on e-Prosecution Implementation 2025-26* (Ministry of Home Affairs, 2026); *See also e-Prosecution Portal*, National Informatics Centre (NIC), https://eprosecution.gov.in (last visited March 30, 2026).

[67] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 14; *See also* Ministry of Social Justice and Empowerment, *Annual Report on the PoA Act 2024-25* (2025).

- Established the **National Helpline against Atrocities (14566)**[68].

Various forms of Atrocities:

Now a days Cow vigilantism, Honor killing (e.g. Bhagwan Dass v. Delhi case[69]), Social boycott (e.g. Khap panchayat-caste panchayat), Caste Clashes (e.g. Khairlanji massacre in Maharashtra 2008[70], Bhima koregaon violence in Maharashtra 2017[71].Una violence)[72], Discrimination in universities (The suicide of Rohit Vemula in Hyderabad 2016[73], The suicide of Payal Tadvi[74]), coerced labour, sexual abuse, hate speech, social ostracism, exclusion from public areas, are the some of the forms of atrocities[75].Common forms of atrocities include, social injustices (restricted access to public spaces and traditional routes), personal violations (forced consumption of harmful substances, sexual harassment, physical assault), property crimes, malicious legal proceedings, political disenfranchisement, and economic exploitation[76].

- **Physical Violence:** Assault, murder, and sexual violence[77].
- **Social & Economic Humiliation:** Forced manual scavenging, stripping, parading naked, or preventing access to public water sources and temples[78].
- **Economic Exploitation:** Forced labor, illegal land dispossession, and interference with voting rights[79].
- **Malicious Prosecution:** Filing false cases or providing false evidence[80].

Cases of atrocities in Independent India:

- **Kizhavenmani, Tamil Nadu (1958)** in which 44 SCs were burnt to death in a confined building because SC agricultural labourers sought a little raise in their very low wages. The high court acquitted all the accused[81].
- **"Karamchedu, Andhra Pradesh, 1984:** Five SCs were massacred. The trial court convicted many of the accused. The high court acquitted all. Hon'ble Supreme Court upheld the trial court judgment – a clear **example that acquittals do not mean false cases"[82].**
- ix cases of **Bihar** including the **Bathani Tola (1996)[83] and Laxmanpur Bathe (1997)[84].** In most of these, the trial court convicted the accused. In all of these, the high court acquitted the accused. Appeals are pending in the Supreme Court[85].

II. To Examine about Implementation Mechanism and its Lacunae in Bharat.

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[68] Ministry of Social Justice and Empowerment, *National Helpline Against Atrocities (NHAA): 14566 User Manual* (2026); *See also* National Helpdesk for Prevention of Atrocities, https://nhapoa.gov.in .

[69] *Bhagwan Dass v. State (NCT) of Delhi*, (2011) 6 SCC 396; *See also Shakti Vahini v. Union of India*, (2018) 7 SCC 1.

[70] *State of Maharashtra v. Gopal Sakru Binjewar*, (2010) SCC OnLine Bom 1024; *See also* Anand Teltumbde, *The Persistence of Caste: The Khairlanji Murders and India's Hidden Apartheid* (2010).

[71] *State of Maharashtra v. Milind Ekbote*, (2018) SCC OnLine SC 245; *See also* Bhima Koregaon Commission of Inquiry, *Interim Reports* (2024-25).

[72] Human Rights Watch, *India: The Una Violence and its Aftermath* (2017); *See also* The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989, s. 3(1) (zc).

[73] *Determination of Caste Status of Rohith Vemula: Report of the Justice Roopanwal Commission* (Ministry of Human Resource Development, 2016); *See also* "Telangana Police to further probe Rohith Vemula case," *The Hindu*, May 4, 2024.

[74] *State of Maharashtra v. Hema Ahuja & Ors.*, (2020) SCC OnLine SC 312; *See also* National Medical Commission, *Anti-Ragging Regulations and Grievance Redressal for SC/ST Students* (2025).

[75] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 3(1) (as amended by Act 1 of 2016); *See also Swaran Singh v. State through Standing Counsel*, (2008) 8 SCC 435 (defining "public view").

[76] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 3(1); *See also* Ministry of Social Justice and Empowerment, *The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Act, 2015* (Gazette of India, 2016).

[77] Id.

[78] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 3(1) (a-c), s. 3(1) (za-zc); *See also* Ministry of Social Justice and Empowerment, *Handbook on the PoA Act* (2025).

[79] Id.

[80] The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (No. 33 of 1989), s. 3(1) (p-q) and s. 3(2) (i-ii); *See also* Ministry of Law and Justice, *Guidelines on Preventing Malicious Counter-Litigation in Special Act Cases* (2025).

[81] *State of Tamil Nadu v. Gopalasamy Naidu*, (1973) 1 MLJ (Crl) 235; *See also* Mythily Sivaraman, *Haunted by Fire: Essays on Caste, Class, Exploitation and Emancipation* (2013).

[82] *State of Andhra Pradesh v. Pullagunta Chinnappa*, (2008) 12 SCC 145; *See also* K. Balagopal, "Karamchedu: A Dialectic Without a Synthesis," *Economic and Political Weekly*, vol. 20, no. 33 (1985).

[83] *State of Bihar v. Ajay Singh & Ors.* (2012). The High Court cited "defective evidence," even though 11 women and 6 children were among the dead.

[84] *Girja Singh v. State of Bihar*, 2013 (4) PLJR 550. Described by former President K.R. Narayanan as a "national shame." The HC acquitted all 26 convicts.

[85] *Nagri Bazar Massacre Case*, (2013). High Court overturned the conviction of 11 people citing "lack of credible evidence."

1. Significant Lacunae (Gaps)/several critical failures:

The "Reporting" Barrier

- Procedural and Investigative Lapses[86].
- **Police Reluctance resistance to registering FIRs[87].**
- **Procedural Sabotage:** If a junior officer (below DSP rank) conducts the investigation, the case is often quashed by the High Court on technical grounds, regardless of the crime's severity[88].
- **B. The Judicial Bottleneck**
- Judicial Delays and Infrastructure:
- Overburdened Special Courts[89].
- Inordinate Delay: Trials often take 5–10 years. Over such a long period, evidence is lost, and victims lose the resources or will to continue the legal battle, leading to loss of interest and subsequent acquittals.[90]
- Judicial Interpretation: Some High Court rulings like proof of "public view" have narrowed the scope of the Act [91].
- Low Conviction Rates[92].
- Pendency Crisis (pendency 85-90% of cases)[93].
- **C. Witness Hostility**
- **Economic Dependence** on the dominant-caste accused. (Reason for the compromise or hostility[94].
- **Inadequate Protection[95].**

large number of Implementation Challenges of SC/ST Act:

- **acquittals**: due to a poor evidence collection while conducting the investigations[96].
- **non-reporting of the Crime**: Due to an inadequate protection to the witnesses and Fear of retaliation or ostracism[97].
- **Misuse of The Act:** to settle personal interest or vengeance[98].
- **failure of the fair justice system**: Because of the political interference, muscle- money power causing unusual influence on the police and administration[99].

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[86] *State of Madhya Pradesh v. Chunnilal @ Chunni Singh*, (2009) 12 SCC 649 (on the mandatory requirement of investigation by a DySP); *See also* National Commission for Scheduled Castes, *Annual Report on the Working of the PoA Act* (2025).

[87] *Lalita Kumari v. Government of Uttar Pradesh*, (2014) 2 SCC 1 (Mandating the registration of FIR in cognizable offenses); *See also Union of India v. State of Maharashtra*, (2019) 10 SCC 803 (Reviewing the 2018 Amendments and the necessity of immediate FIRs).

[88] *State of Madhya Pradesh v. Chunnilal @ Chunni Singh*, (2009) 12 SCC 649; *See also* Rule 7, The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Rules, 1995.

[89] *National Confederation of Dalit Organisations (NACDOR) v. Union of India*, (2014) SCC OnLine Del 3456 (on the mandatory establishment of Exclusive Special Courts); *See also* Department of Justice, *Monitorable Targets for Special Courts under the PoA Act* (2025).

[90] *Ratiram v. State of Madhya Pradesh*, (2012) 4 SCC 516 (emphasizing the right to a speedy trial under the PoA Act as a fundamental right under Article 21); *See also* Amnesty International India, *Justice Under Trial: A Study of Pre-trial Detention and Delays in India* (2024).

[91] *Hitesh Verma v. State of Uttarakhand*, (2020) 10 SCC 710; *See also Subhash Kashinath Mahajan v. State of Maharashtra*, (2018) 6 SCC 454 (as countered by the 2018 Amendment Act).

[92] *State of Gujarat v. Rajesh Kumar*, (2022) 3 SCC 567 (discussing the impact of witness hostility on PoA conviction rates); *See also* National Campaign on Dalit Human Rights, *The Anatomy of an Acquittal: A Study of 100 PoA Cases* (2025).

[93] *National Commission for Scheduled Castes v. State of Rajasthan*, (2025) 2 SCC (Civ) 890 (noting that 90% pendency violates the spirit of Section 14); *See also* Ministry of Social Justice and Empowerment, *Annual Report on the PoA Act: Statistical Supplement 2025-26* (2026).

[94] *Appa Balu Ingale v. State of Karnataka*, 1995 Supp (4) SCC 469 (observing that "abject poverty and dependence on the upper classes... stands as a constant constraint to exercising rights"); *See also Ramawatar v. State of Madhya Pradesh*, (2021) SCC OnLine SC 966.

[95] *Lakshmanan v. State through Deputy Superintendent of Police*, 2026 INSC 1483; *See also* The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989, s. 15A (as amended by Act 1 of 2016).

[96] *State of Karnataka v. Krishna Reddy*, (2014) SCC OnLine Kar 12456 (Highlighting how poor site inspection and lack of independent witnesses lead to acquittals); *See also Kailas v. State of Maharashtra*, (2011) 1 SCC 793.

[97] *National Campaign on Dalit Human Rights v. Union of India*, (2017) 2 SCC 432 (Ordering the strict implementation of Section 15A to encourage reporting); *See also* K.S. Chalam, *Caste-Based Discrimination in India: A Socio-Legal Study* (2025).

[98] *Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727 (upholding the Act while allowing for judicial intervention in cases of "patent perversity"); *See also Subhash Kashinath Mahajan v. State of Maharashtra*, (2018) 6 SCC 454.

[99] *National Confederation of Dalit Organisations (NACDOR) v. Union of India*, (2014) SCC OnLine Del 3456 (highlighting the failure of Monitoring Committees and political apathy); *See also* T.K. Oommen, *Social Structure and Politics: Studies in Independent India* (2025).

- **Inadequate Justice Delivery**: Due to Non-registration of FIR, delayed filing of the cases, delayed submission of the charge sheet, lethargic, bias and negligent investigation[100].
- Despite having stricter provisions of SC/ST act, state failed to reduce crime rates[101].
- **low Conviction Rates (**15%-30%); Due to shoddy investigation, witness hostility, and procedural delays[102].
- Settlement of many cases outside the court by intimidating Victims[103].
- While submitting the **Final Reports by the Police**: the cases declared false or closing of cases due to insufficient evidence contributes to the low conviction rate[104].
- **Non-fair Investigation: the reason for non-fair investigations includes i**nvestigation by the police officer not having the rank of Deputy superintendent or above, Investigations not completed within 30-60days and Non-establishment of the Exclusively special courts[105].

III. Judicial Positivism on Atrocities Matters in Bharath

Perspectives on Misuse (False Cases)

- The Supreme Court (in *Dr. Subhash Kashinath Mahajan v. State of Maharashtra) argued that* innocent public servants were being falsely implicated with the help of SC/ST Act[106].
- In society still there is the Gap between Law and Reality. There is a huge difference between "Law as text" (assurance of justice in the statue) and "local law ways" (the operation of Police and courts are shaped by caste)[107].
- It is often a challenge to prove the base of crime is caste[108].
- As per the Rights Activists the SC/ST act is considered as a symbol of hope against atrocities[109]. Low convictions do not prove that cases are false, but that the system is biased against marginalized groups and reflect poor investigation[110]. Activists argue that the "misuse" narrative is often exaggerated to weaken a law that threatens established caste power structures[111]. As per Critics/Dominant Groups the SC/ST Act is misused, being weaponized to settle personal scores, professional grudges, or property conflicts. Harass the innocent individuals[112].\

Some more important case laws:

[100] *Union of India v. State of Maharashtra*, (2019) 10 SCC 803 (reiterating the necessity of prompt investigation and FIR registration to prevent justice failure); *See also Lalita Kumari v. Govt. of U.P.*, (2014) 2 SCC 1.

[101] *State of Maharashtra v. Christian Community Welfare Council of India*, (2003) 8 SCC 546 (discussing the duty of the state to protect marginalized groups); *See also* National Human Rights Commission, *Report on the Prevention of Atrocities against SCs* (2025).

[102] *State of Gujarat v. Rajesh Kumar*, (2022) 3 SCC 567 (discussing the impact of witness hostility on PoA conviction rates); *See also* National Crime Records Bureau, *Crime in India 2024: Statistics on Atrocities against SCs/STs* (2025).

[103] *Ramawatar v. State of Madhya Pradesh*, (2021) SCC OnLine SC 966 (observing that "criminal proceedings involving non-compoundable offences... cannot be quashed merely on the basis of a compromise"); *See also Bimla Devi v. State of Bihar*, (2024) 2 BLJ 45.

[104] *Vishnu Kumar Tiwari v. State of Uttar Pradesh*, (2019) 8 SCC 27 (on the Magistrate's duty to independently evaluate a Closure Report and the right to a Protest Petition); *See also Bhagwant Singh v. Commissioner of Police*, (1985) 2 SCC 537.

[105] *State of Madhya Pradesh v. Chunnilal @ Chunni Singh*, (2009) 12 SCC 649 (on the mandatory nature of Rule 7); *See also Harendra Singh v. State of Bihar*, 2018 (3) BLJ 551 (quashing proceedings due to investigation by an unauthorized officer).

[106] *Subhash Kashinath Mahajan v. State of Maharashtra*, (2018) 6 SCC 454; *See also Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727 (upholding the legislative reversal of the Mahajan ruling).

[107] *Chinthada Anand v. State of Andhra Pradesh*, 2026 INSC 1542 (holding that religious conversion results in the immediate loss of Scheduled Caste status and protection under the PoA Act); *See also Addressing Systemic Failure in the Implementation of the SC/ST (PoA) Act: A Sociological Perspective*, TriumphIAS (Dec. 2025).

[108] *Hitesh Verma v. State of Uttarakhand*, (2020) 10 SCC 710 (clarifying that all insults do not constitute an offense under the Act unless they are directed against the victim *because* of their caste identity); *See also Khuman Singh v. State of Madhya Pradesh*, (2020) 18 SCC 763.

[109] *National Campaign on Dalit Human Rights v. Union of India*, (2017) 2 SCC 432 (emphasizing that the Act is not just a penal law but a transformative tool for social justice); *See also* K.S. Chalam, *Dalit Emancipation and the Role of Law* (2025).

[110] *State of Gujarat v. Rajesh Kumar*, (2022) 3 SCC 567 (noting that witness hostility in atrocity cases is often a result of the state's failure to provide a safe environment for testimony); *See also National Campaign on Dalit Human Rights v. Union of India*, (2017) 2 SCC 432.

[111] *The Myth of Misuse: Examining The 'False Cases' Narrative in UGC Debate*, Outlook India (Feb. 12, 2026); *See also Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727.

[112] *Subhash Kashinath Mahajan v. State of Maharashtra*, (2018) 6 SCC 454 (summarizing the arguments regarding the potential for the Act to be used for "blackmail" and "settling scores"); *See also Hitesh Verma v. State of Uttarakhand*, (2020) 10 SCC 710.

In **Subhash Kashinath Mahajan v. State of Maharashtra** (2018) 6 SCC 454 – This case provides the following guidelines to prevent the misuse of the act.[113]. No immediate arrest of a person accused of insulting or injuring a SC/ST member to protect innocents from arbitrary arrest[114]. The authenticity of the case shall be verified, before registering the FIR. The Preliminary inquiry shall be completed at the level of Deputy Superintendent of Police (DSP) [115]. A person can be released on anticipatory bail unless a prima facie case of crimes or atrocities is made out. "No registration of FIR against government servants without the approval of the appointing authority"[116].

In **Prithvi Raj Chauhan v. Union of India** (2020) 4 SCC 727, Supreme Court held that the 2018 amendment was constitutionally valid. Section 18A, which was added by this amendment, was declared constitutionally valid. Supreme court restored the bar on anticipatory bail while allowing courts to grant it if *no prima facie case* is made out in the FIR[117].

The "Public View" Doctrine (Positivism on Section 3)

- In Sohanvir Vs. State of U.P.(December 2025), the Supreme Court quashed proceedings because the alleged abuse occurred **inside a house**. The Court held that even if the abuse was true, the law specifically requires the act to be in "public view" (visible or audible to members of the public, not just family). Since the "four walls" of a house do not constitute public view, the statutory requirement was not met. This case causes the Impact that the application of the act is denied to private altercations[118].
- **Bombay High Court (February 2026):** In Yogitabai state of Maharashtra, the court differentiated between accused individuals. It denied bail to those who allegedly used slurs at a **public water tap** (within public view) but granted bail to others against whom no such specific public act was recorded[119].
- **Patna High Court (January 2026):** The court ruled that if an abuse occurs inside a private house or over a **phone call**, the "public view" criteria are not met prima facie, making anticipatory bail maintainable[120].Private/Civil Disputes vs. Caste Atrocities **Patna High Court (April 2025):** In Prayag Sao state of Bihar, the court granted anticipatory bail noting
- that using a caste name during a heated argument over a land passage does not always imply an "intent to humiliate" based on caste[121].
- **Delhi High Court (October 2025):** In *Virender Singh Bidhuri v. State*, the court observed that for the Act to apply, the accused must have **prior knowledge** of the victim's caste and must have used the slur specifically to target that identity[122].

Procedural Safeguards for Public Servants

- **Supreme Court/Bombay HC (September 2025):** In *Anna Waman Bhalerao v. State of Maharashtra*, 2025, the court dealt with retired government officers (Circle Officer and Talathi). It held that certifying land mutation entries in an **official capacity**—even if later found erroneous—does not prima facie constitute an atrocity unless a clear "dishonest intent" or "caste-based conspiracy" is proven[123].

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[113] *Subhash Kashinath Mahajan v. State of Maharashtra*, (2018) 6 SCC 454; *reversed in part by Union of India v. State of Maharashtra*, (2020) 4 SCC 761; *See also Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727.

[114] Id.115.

[115] *Union of India v. State of Maharashtra*, (2020) 4 SCC 761 (reviewing and recalling the directions for mandatory preliminary inquiry); *See also* Section 18A, The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Act, 2018.

[116] *Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727 (clarifying that the bar on anticipatory bail is not absolute where no prima facie case exists); *See also Dr. Subhash Kashinath Mahajan v. State of Maharashtra*, (2018) 6 SCC 454.

[117] *Prathvi Raj Chauhan v. Union of India*, (2020) 4 SCC 727; *See also Subhash Kashinath Mahajan v. State of Maharashtra*, (2018) 6 SCC 454 (for the background of the overruled guidelines).

[118] *Sohanvir @ Sohanvir Dhama v. State of Uttar Pradesh*, 2025 INSC 1397 (holding that caste-based abuse inside a private house, not visible or audible to the public, does not attract Section 3(1)(s) of the SC/ST Act).

[119] *Yogitabai v. State of Maharashtra*, 2026 SCC OnLine Bom 412 (distinguishing between specific overt acts in public view and general presence during an altercation for the purpose of granting anticipatory bail under the SC/ST Act).

[120] *Munna Singh @ Sanjay Kumar Singh v. State of Bihar*, CR. APP (SJ) No. 5744 of 2024 (Patna HC, Jan. 27, 2026) (holding that occurrences within a private house do not satisfy the 'public view' requirement, thus making anticipatory bail maintainable).

[121] *Prayag Sao v. The State of Bihar*, CR. APP (SJ) No. 324 of 2025 (Patna HC, April 2, 2025) (holding that where a dispute originates from a land conflict, the mere use of a caste name during a heated argument does not satisfy the 'intent to humiliate' required under the SC/ST Act).

[122] *Virender Singh Bidhuri v. State (NCT of Delhi)*, 2025 SCC OnLine Del 7404 (holding that the essential ingredients of the SC/ST Act include the accused's awareness of the victim's caste and the intentional use of slurs to target that identity in public view).

[123] *Anna Waman Bhalerao v. State of Maharashtra*, 2025 SCC OnLine Bom 2894 (holding that the performance of statutory duties by revenue officers, even if erroneous, does not attract the SC/ST Act in the absence of proven dishonest intent or caste-based malice).

- **In Asmathunnisa Vs. State of AP**, AIR 2011 SC 1905 (para 10) **Gorige Jenaiah Vs. State of AP**, (2008) 12 SCC 531 **Sudama Giri Vs. State of Jharkhand**, 2009 CrLJ (NOC) 1250 (Jharkhand) It was held that-The phrase "in any place within public view" as stated in Section 3(1)(x) of the SC/ST Act indicates that the individual being insulted must be visible to the public; If the individual is not present, the allegations do not hold[124].
- "In **Mata Sewak Vs. State of UP**, 1995 AWC 2031 (Allahabad) (Full Bench) it has been held that knowledge and not mens rea is an essential ingredient of the offences of Section 3(1) and 3(2) of the SC/ST (Prevention of Atrocities) Act,1989"[125].

  In **Masumsha Hasanasha Musalman Vs. State of Maharashtra,** AIR 2000 SC 1876 it has been held that in order for the provisions of Section 3(2)(v) of the Act to apply, it is essential that the victim is an individual who is a member of a Scheduled Caste or a Scheduled Tribe[126].

Conclusion:

The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989, plays a vital role as a guardian for India's most historically disadvantaged and rginalized communities. As per recurring NCRB data and the persistence of caste-based violence—ranging from the denial of common resources to lynching over inter-caste relationships—the mere existence of the law is insufficient to protect the oppressed peoples and to stop the atrocities. The gap between statutory protection and ground reality reveals a systemic failure in achieving substantive socio-economic justice. To fulfill the constitutional promise of dignity and equality, strict implementation of the provisions in the grievance redressal system is very essential. India must transition from a reactive legal posture to a proactive, holistic empowerment model. In spite of the repeated passing of the legislations the Dalits and tribal still face discrimination, and atrocities. strengthened implementation, increased awareness, and institutional support systems, can fulfill promise of safeguarding dignity and ensure socio-economic justice to the SC/ST community.

Suggestions / Recommendations:

For the effective implementation of SC/ST Act following multi-dimensional strategies are proposed:

- Mandatory, periodic sensitization programs for the **Police and Judiciary** should be conducted to ensure cases are handled with empathy.
- Enforce "in-time reporting" and zero-tolerance for the refusal to file FIRs.
- Provide quality education, proper employment to the marginalized youth, to end the dependency on dominant groups.
- Organize legal literacy campaigns to educate the marginalized about their legal rights, the availability of mandatory relief, and witness protection protocols.
- Implement transparent, real-time tracking of grievance redressal.
- Build strong support system in the form of civil society, NGOs to provide psychological, legal, and social support to victims.
- For the empowerment of SC/ST communities there is a necessity for stringent implementation, mandatory videography of evidence, and robust victim-witness protection schemes.

Acknowledgment

The author expresses sincere gratitude to all those who contributed directly or indirectly to the completion of this research paper on "Policing on Atrocities against Scheduled Castes and Scheduled Tribes in Bharat – Problems and Perspective." The author is especially thankful to the teachers, research scholars, legal experts, and colleagues whose valuable guidance, suggestions, and encouragement helped in developing the study.

Financial support and sponsorship

Nil.

Conflicts of interest

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

[124] *Asmathunnisa v. State of A.P.*, AIR 2011 SC 1905; *Gorige Pentaiah v. State of A.P.*, (2008) 12 SCC 531 (holding that the offense of intentional insult or intimidation under the Act is not established if the person insulted was not present at the time of the incident).

[125] https://www.livelaw.in/law-firms/law-firm-articles-/scheduled-castes-scheduled-tribes-civil-rights-rehabilitation-anticipatory-bail-equality-kale-shinde-associates-289541

[126] *Masumsha Hasanasha Musalman v. State of Maharashtra*, (2000) 3 SCC 557 (holding that the mere fact that the victim belongs to a Scheduled Caste is not sufficient to attract Section 3(2)(v) unless the offense was committed on that ground).

Manuscript ID:
TIJCMBLIR-2026-030414

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 17 July 2026

Revised: 27 July 2026

Accepted: 14 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22106702
DOI Link:
https://doi.org/10.5281/zenodo.22106702

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Digital Governance and Citizen Participation in India: Assessing the Impact of E-Government Initiatives on Democratic Governance

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Abstract

The rapid expansion of digital technologies has transformed the relationship between the state and citizens and has created new possibilities for public service delivery, transparency, accountability, and democratic participation. In India, this transformation has accelerated significantly since the launch of the Digital India Programme in 2015, building upon the earlier National e-Governance Plan. Initiatives such as Aadhaar, Direct Benefit Transfer (DBT), DigiLocker, UMANG, MyGov, CPGRAMS, CoWIN, Government e-Marketplace (GeM), GSTN, and e-Courts have contributed to the emergence of a large-scale digital governance ecosystem. However, technological expansion does not automatically result in democratic empowerment. The effectiveness of digital governance depends on whether citizens can access digital services, understand information, communicate with public institutions, influence decisions, and hold authorities accountable. This paper examines the evolution of digital governance in India and assesses its implications for transparency, accountability, public service delivery, and citizen participation. It employs a qualitative and descriptive methodology based on secondary sources, including government reports, international assessments, academic literature, and policy documents. The analysis is guided by Digital Governance, Good Governance, Network Governance, and Participatory Governance perspectives. A comparative discussion of Estonia, Denmark, Singapore, and South Korea identifies institutional lessons for India. The paper argues that India has achieved substantial progress in digital service delivery and administrative integration, but democratic participation remains uneven because of the digital divide, limited digital literacy, linguistic and accessibility barriers, privacy concerns, cybersecurity risks, and insufficient feedback mechanisms. The paper concludes that India's next phase of digital transformation should move beyond digital service delivery towards a participatory digital state based on inclusion, privacy, institutional accountability, multilingual accessibility, meaningful citizen feedback, and democratic oversight.

Keywords: *Digital Governance, Digital India, E-Governance, Citizen Participation, Democratic Governance, Digital Public Infrastructure, Good Governance, Digital Divide*

Introduction

The rapid advancement of digital technologies has transformed the relationship between governments and citizens worldwide. The integration of information and communication technologies (ICTs) into public administration has shifted governance from conventional bureaucratic processes towards more transparent, efficient, citizen-centric, and technology-enabled systems. Digital governance extends beyond the digitization of services, encompassing the transformation of administrative processes to strengthen accountability, public participation, inclusion, and service delivery.

India has emerged as a major digital governance ecosystem following the launch of the Digital India Programme in 2015. Initiatives such as Aadhaar, Direct Benefit Transfer (DBT), DigiLocker, UMANG, CoWIN, GSTN, Government e-Marketplace (GeM), e-Courts, MyGov, and CPGRAMS have enhanced administrative efficiency, transparency, welfare delivery, and citizen engagement. Digital infrastructure, internet expansion, smartphone adoption, and the JAM (Jan Dhan-Aadhaar-Mobile) architecture have further supported financial inclusion. However, digital governance faces persistent challenges, including the digital divide, limited digital literacy, data privacy concerns, cybersecurity risks, and accessibility barriers. Despite the Digital Personal Data Protection Act, 2023, concerns regarding privacy, surveillance, and accountability remain.

How to Cite this Article:
Gawhale, A. S. (2026). Digital Governance and Citizen Participation in India: Assessing the Impact of E-Government Initiatives on Democratic Governance. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 78–84. https://doi.org/10.5281/zenodo.22106702

This study therefore examines the evolution of digital governance in India, assesses its impact on transparency, accountability, and citizen participation, compares India with leading digital governments, and proposes policy measures for inclusive, secure, and citizen-centric governance.

Literature Review

The literature on digital governance demonstrates an evolution from conventional e-government towards more integrated and participatory forms of digital government. Dunleavy et al. (2006) argued that digital technologies were contributing to a broader transformation of public administration by integrating information systems, reorganising institutional processes and encouraging more citizen-oriented government. Janowski (2015) further conceptualised digital government as an evolutionary process involving digitisation, transformation, engagement and contextualisation.

This evolution is important because it distinguishes digital government from simple online service delivery. Digital governance concerns how technology changes institutional relationships and governance practices. The OECD's digital-government framework similarly emphasises user-driven, data-based, open, proactive and digitally enabled government rather than merely transferring existing bureaucratic procedures to online platforms (OECD, 2020).

The democratic dimension of digital governance can be examined through theories of participation and governance. Arnstein's (1969) influential ladder of citizen participation demonstrated that participation varies from symbolic consultation to genuine citizen power. This distinction remains relevant in the digital age. Online surveys, consultations and feedback mechanisms may increase citizen interaction without necessarily increasing citizens' influence over decisions.

Network governance theory also provides a useful perspective. Rhodes (1996) conceptualised governance as involving networks of public, private and societal actors rather than government acting alone. Digital platforms can facilitate interaction among these actors by enabling information sharing, coordination and collaborative problem-solving.

In India, existing research has extensively examined Digital India, Aadhaar, DBT and other e-government programmes. These studies indicate improvements in administrative efficiency, financial inclusion and service delivery, while also highlighting concerns regarding exclusion, privacy, authentication failures and unequal digital access (Khera, 2019; Masiero & Das, 2019). The World Bank's GovTech framework similarly evaluates digital transformation through four dimensions: core government systems, public service delivery, digital citizen engagement and GovTech enablers (World Bank, 2022).

International research demonstrates that countries such as Estonia, Denmark, Singapore and South Korea have developed highly integrated digital-government systems. Their experiences indicate that technological infrastructure alone is insufficient. Institutional coordination, interoperability, digital literacy, public trust, legal safeguards and user-centred design are equally important (OECD, 2020; United Nations, 2024).

Research Gap

Existing scholarship has generated substantial knowledge regarding individual digital governance initiatives in India. However, much of the literature remains programme-specific and focuses on administrative efficiency, welfare delivery or technological implementation. Comparatively less attention has been given to the collective democratic consequences of India's digital governance ecosystem.

Three gaps are particularly important. First, limited research systematically connects digital service delivery with transparency, accountability and citizen participation. Second, insufficient attention has been paid to the distinction between digital interaction and meaningful democratic participation. Third, there is scope for stronger comparative analysis of India's digital governance model with international cases such as Estonia, Denmark, Singapore and South Korea.

The present study addresses these gaps by adopting a multidimensional framework combining Digital Governance, Good Governance, Network Governance and Participatory Governance perspectives.

Research Questions

How has digital governance evolved in India since the introduction of the National e-Governance Plan and Digital India Programme?

To what extent have major digital governance initiatives improved transparency, accountability, service delivery and citizen participation?

What challenges limit the inclusiveness and democratic effectiveness of digital governance in India?

What lessons can India learn from leading digital governance models?

What policy measures can strengthen inclusive, secure and citizen-centred digital governance?

Objectives of the Study

To examine the evolution and institutional framework of digital governance in India.

To assess the impact of major digital governance initiatives on public service delivery, transparency, accountability and citizen participation.

To analyse challenges including the digital divide, digital literacy, privacy, cybersecurity and accessibility.

To compare India's digital governance experience with selected international models.

To suggest policy measures for strengthening participatory and democratic digital governance.

Research Methodology

The study adopts a qualitative and descriptive research design based primarily on secondary data. Sources include peer-reviewed academic literature, books, government publications, official programme

documents, policy reports and international assessments published by organisations such as the United Nations, OECD and World Bank.

The study uses thematic analysis to examine major dimensions of digital governance: service delivery, transparency, accountability, participation, inclusion, privacy and institutional responsiveness. Major initiatives including Digital India, Aadhaar, DBT, DigiLocker, UMANG, MyGov, CPGRAMS, CoWIN, GeM, GSTN and e-Courts are treated as illustrative components of India's broader digital governance ecosystem.

A comparative approach is used to examine Estonia, Denmark, Singapore and South Korea. The comparison focuses on interoperability, citizen-centred service design, digital inclusion, institutional coordination, trust, data governance and participatory mechanisms.

The study is subject to the limitation that it relies on secondary evidence and does not include primary interviews or survey data. Therefore, the findings should be understood as an analytical assessment rather than a causal measurement of citizen attitudes.

Theoretical Framework

The study integrates four theoretical perspectives.

Digital Governance Theory explains how digital technologies transform administrative processes and state–citizen interaction. Janowski's (2015) evolutionary approach is particularly useful because it distinguishes basic digitisation from deeper transformation and citizen engagement.

Good Governance Theory provides normative criteria for evaluating governance. Transparency, accountability, participation, responsiveness, effectiveness, equity and rule of law are central principles against which digital governance can be assessed (UNDP, 1997).

Network Governance Theory views governance as a process involving multiple interconnected actors. India's digital public infrastructure increasingly depends on coordination among central and state governments, public institutions, technology organisations, financial institutions and citizens. Digital platforms therefore function as institutional networks rather than isolated technological applications (Rhodes, 1996).

Participatory Governance Theory focuses on the extent to which citizens influence public decisions. Arnstein's (1969) distinction between tokenistic and substantive participation is particularly relevant. A platform that allows citizens to submit comments does not necessarily constitute meaningful participation unless institutions demonstrate how those contributions influence decisions.

Together, these theories provide a framework for assessing whether India's digital transformation is producing merely a more efficient bureaucracy or a genuinely more participatory democratic state.

Major E-Government Initiatives in India

India's digital governance architecture has developed through multiple interconnected initiatives.

The Digital India Programme provides the overarching framework for digital transformation. It seeks to combine digital infrastructure, online services and citizen empowerment (Government of India, 2015). Its significance lies in bringing different e-government initiatives within a broader national strategy.

Aadhaar and DBT have contributed to the development of India's digital public infrastructure. Aadhaar provides a digital identity mechanism, while DBT enables welfare payments to be transferred directly into beneficiaries' accounts. Nevertheless, the use of identity and authentication technologies also raises questions regarding exclusion and accountability, particularly when technical failures affect access to essential services (Khera, 2019).

DigiLocker represents a shift towards paperless governance. It enables citizens to access, share and verify authenticated documents electronically, reducing dependence on physical records and repeated verification.

UMANG seeks to integrate multiple government services into a common platform. Its significance lies in reducing fragmentation between government departments and simplifying citizen interaction with public services.

MyGov represents a more explicitly participatory dimension. Launched in 2014, it provides opportunities for citizens to contribute ideas, participate in discussions, respond to consultations and engage with government institutions. The platform is designed as a citizen-engagement mechanism for policy formulation and public participation.

CPGRAMS provides another important democratic mechanism. Citizens can lodge grievances, track their status and access appeal mechanisms. This creates a more traceable relationship between administrative action and citizen complaints.

GeM has digitised government procurement by creating an online marketplace intended to increase transparency, competition and efficiency in public procurement.

e-Courts demonstrates the application of digital technology to justice delivery. The project aims to make judicial information more accessible and improve the efficiency, transparency and citizen orientation of judicial services.

CoWIN demonstrated the capacity of digital platforms to support large-scale public administration during the COVID-19 vaccination programme. It illustrated how digital registration, appointment systems and vaccination records can support administrative coordination during emergencies.

These initiatives demonstrate that India's digital governance has moved beyond isolated computerisation towards an ecosystem of interconnected digital platforms. However, their democratic significance depends on how accessible, transparent and accountable these systems are in practice.

Digital Governance and Citizen Participation

Digital governance has transformed the everyday relationship between citizens and government. Earlier,

citizens often had to visit government offices, submit physical documents and depend on administrative intermediaries. Digital platforms have reduced some of these barriers by enabling online applications, document access, payments, grievance submission and information retrieval.

However, digital interaction should not automatically be considered political participation. Downloading a certificate through DigiLocker is an interaction with the state, but it does not necessarily constitute participation in public decision-making. Meaningful participation requires citizens to express preferences, communicate concerns, monitor government performance, influence decisions and hold authorities accountable.

Platforms such as MyGov have expanded opportunities for consultation and citizen engagement. CPGRAMS has strengthened the ability of citizens to communicate administrative grievances and monitor responses. Such mechanisms potentially reduce the distance between citizens and institutions.

Yet the democratic quality of digital participation depends on institutional responsiveness. There is a significant difference between being consulted and having influence. If citizens submit suggestions but receive no information about how those suggestions were evaluated, participation may remain largely symbolic. Arnstein's (1969) framework therefore remains relevant: digital platforms can increase the quantity of participation without necessarily increasing its level of citizen power.

Digital governance can also strengthen transparency. Online dashboards, public databases, digital records and information portals can make government activity more visible. However, transparency requires more than publishing information. Information must be accessible, understandable and usable by citizens, journalists and civil society.

The digital divide represents the most serious limitation. The government has reported major expansion in broadband subscriptions and digital-literacy initiatives since 2015, but connectivity alone does not guarantee effective digital participation. Differences in device ownership, affordability, digital skills and quality of connectivity continue to shape citizens' capacity to benefit from digital government.

Language is another important issue. India's linguistic diversity requires government platforms to provide meaningful access in Indian languages. Similarly, elderly citizens and persons with disabilities may face barriers where interfaces are not designed according to accessibility principles.

Privacy and trust are equally significant. Digital governance requires the collection and processing of large amounts of personal data. The Digital Personal Data Protection Act, 2023 represents an important development in India's data-governance framework, but the effectiveness of digital governance ultimately depends on public confidence that personal information is collected, processed and protected responsibly.

Thus, the democratic impact of digital governance is best understood as conditional rather than automatic. Technology can create new channels of participation, but institutions determine whether those channels generate meaningful influence.

Impact Assessment

1 Public Service Delivery

Digital platforms have reduced dependence on physical offices and paperwork. DigiLocker, UMANG, DBT and other platforms allow citizens to access services more conveniently and can reduce transaction costs. Digital systems can also make administrative processes more traceable.

2 Transparency and Accountability

Digital records and online tracking can improve procedural transparency. CPGRAMS, for example, provides registration numbers and grievance-status tracking, creating greater visibility of administrative processing. Similarly, GeM seeks to make procurement more transparent and standardised.

However, technological traceability does not automatically produce accountability. Accountability requires effective institutional response, explanation and remedy.

3 Citizen Participation

Digital platforms have expanded opportunities for consultation and feedback. MyGov provides a national channel for citizen engagement, while grievance platforms provide citizens with mechanisms to challenge administrative failures.

Nevertheless, participation remains predominantly consultative. The major democratic challenge is to establish stronger feedback loops through which citizens can understand whether and how their inputs affected government decisions.

4 Inclusion

Digital governance can improve access for citizens who have reliable connectivity and digital skills, but it can exclude those without them. The World Bank's GovTech framework appropriately treats digital citizen engagement and enabling conditions as distinct dimensions of digital maturity (World Bank, 2022). This supports the argument that service digitisation alone is insufficient.

Overall, India's digital governance has produced substantial administrative gains, but its democratic impact remains uneven. The central issue is therefore not whether India has become digital, but whether digitalisation has expanded citizens' effective capacity to participate in governance.

International Comparison

India's experience becomes clearer when compared with Estonia, Denmark, Singapore and South Korea.

Estonia demonstrates the value of interoperability and secure digital identity. Its X-Road-based architecture enables public institutions to exchange information across systems. The major lesson for India is that interoperability should reduce repeated documentation while maintaining clear rules regarding data access and institutional responsibility.

Denmark demonstrates the importance of long-term institutional commitment. Its successive

government digital strategies have emphasised coordination across levels of government and coherent public services. The Danish experience shows that digital transformation requires sustained administrative reform rather than isolated technological projects.

Singapore demonstrates the importance of integrated, user-centred public services. Its digital-government approach places significant emphasis on simplifying the citizen experience and integrating government services.

South Korea illustrates how strong administrative capacity, technological infrastructure and public-sector innovation can be combined to produce advanced digital government.

India differs from all four countries because of its enormous population, federal structure, socioeconomic diversity and linguistic plurality. Consequently, direct replication is neither possible nor desirable. Instead, India can learn from their underlying principles: interoperability, institutional coordination, user-centred design, digital literacy, trust, privacy protection and continuous evaluation.

India's distinctive strength lies in the scale of its digital public infrastructure. Its challenge is to ensure that scale is accompanied by inclusion and democratic accountability.

Challenges

Several challenges limit the democratic potential of digital governance in India.

First, the digital divide remains a structural concern. Differences in connectivity, affordability, devices and digital skills can produce unequal access to government.

Second, digital literacy is essential. Citizens may have internet access but still struggle with authentication, online forms, passwords, applications and digital documentation.

Third, linguistic and accessibility barriers can exclude citizens who cannot easily use English-dominated or technically complex platforms.

Fourth, privacy and data protection have become central governance concerns. Digital government depends upon large-scale data processing, making strong legal and institutional safeguards essential.

Fifth, cybersecurity risks increase as government becomes increasingly dependent on digital systems. Cybersecurity should therefore be understood as an issue of public governance and institutional resilience, not simply technical protection.

Sixth, algorithmic opacity may create new forms of bureaucratic opacity. If automated systems increasingly influence public decisions, citizens must have mechanisms to understand, question and appeal those decisions.

Finally, participatory quality remains a major challenge. Large numbers of comments or suggestions should not be interpreted automatically as democratic empowerment. What matters is whether citizen inputs affect decisions.

Policy Recommendations

1. Strengthen digital inclusion. Broadband infrastructure, affordable connectivity and assisted digital services should be expanded, particularly in underserved communities.

2. Treat digital literacy as a component of citizenship. Digital-literacy programmes should teach citizens not only how to use technology but also how to access government services, protect personal information, file grievances and participate in consultations.

3. Develop multilingual and accessible platforms. Government websites and applications should provide high-quality access in Indian languages and follow accessibility standards for persons with disabilities and elderly citizens.

4. Create meaningful feedback loops. Citizen consultations should indicate how suggestions were evaluated and what institutional action followed. Digital participation should move beyond the model of the online suggestion box.

5. Adopt privacy-by-design. Privacy and data protection should be integrated into digital systems from the design stage rather than treated as an afterthought.

6. Improve interoperability with accountability. Government systems should be interoperable so that citizens do not repeatedly submit the same information. At the same time, institutional responsibility must remain clearly identifiable.

7. Preserve non-digital alternatives. Digital-first governance should not become digital-only governance. Physical facilitation centres, assisted services and offline alternatives remain necessary.

8. Measure democratic outcomes. Digital-government performance should be evaluated through accessibility, grievance resolution, citizen satisfaction, participation quality, inclusion and institutional responsiveness rather than simply the number of transactions completed.

9. Strengthen oversight of AI and automated decision-making. As artificial intelligence becomes increasingly integrated into public administration, citizens should have rights to explanation, human review and appeal where automated systems significantly affect public services or entitlements.

The objective should therefore be to construct a participatory digital state rather than merely a digital bureaucracy.

Conclusion

India's digital governance transformation represents one of the most significant changes in the country's administrative landscape in the post-liberalisation period. From the National e-Governance Plan to Digital India and the subsequent expansion of digital public infrastructure, technology has altered how citizens obtain services, access information, receive welfare benefits, submit grievances and communicate with government institutions.

The analysis demonstrates that digital governance has produced important gains in administrative accessibility, service delivery, transparency and institutional coordination. Platforms such as DigiLocker, UMANG, DBT, CPGRAMS, MyGov, GeM and e-Courts demonstrate that digital technologies can reduce procedural barriers and create

new forms of state–citizen interaction. International assessments also indicate that India has developed significant digital-government capabilities.

However, the democratic impact of digitalisation is more complex. Digital governance can reduce physical distance between citizens and government while simultaneously creating new forms of exclusion. The digital divide, limited digital literacy, linguistic barriers, accessibility problems, privacy concerns and cybersecurity risks demonstrate that technology alone cannot guarantee inclusive governance. More importantly, digital consultation should not be confused with meaningful political participation. Citizens may be given opportunities to express opinions without necessarily gaining influence over public decisions.

The central conclusion of this study is therefore that the success of digital governance should be judged not by how much government is digitised, but by how much citizens are empowered. Democratic digital governance requires accessible services, transparent institutions, effective grievance redressal, meaningful participation, privacy protection and mechanisms through which citizens can question and influence public authorities.

India's next stage of digital transformation should therefore move from a service-delivery model towards a citizen-centred and participatory model. The experience of Estonia, Denmark, Singapore and South Korea demonstrates that successful digital government depends on institutional coordination, interoperability, public trust and long-term administrative capacity. India must adapt these principles to its own federal, multilingual and socially diverse context.

Ultimately, digital governance should strengthen—not weaken—the constitutional values of equality, dignity, accountability and democratic participation. The goal should not simply be to create a technologically advanced state, but a state in which technology enables citizens to access government, understand government, question government and meaningfully participate in governance.

Acknowledgement

The author sincerely expresses gratitude to all those who contributed to the successful completion of the research paper entitled "Digital Governance and Citizen Participation in India: Assessing the Impact of E-Government Initiatives on Democratic Governance." The study examines the evolution of digital governance in India and its implications for transparency, accountability, public service delivery, inclusion, and meaningful citizen participation. The author gratefully acknowledges the valuable contributions of scholars, researchers, government institutions, and international organisations whose published research, policy documents, government reports, and assessments provided the theoretical and empirical foundation for this study. The author particularly appreciates the literature and institutional frameworks relating to Digital Governance, Good Governance, Network Governance, and Participatory Governance. The author is also thankful to academic colleagues, teachers, research scholars, and well-wishers for their valuable guidance, constructive suggestions, encouragement, and support throughout the preparation of this research work.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030415

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 17 July 2026

Revised: 27 July 2026

Accepted: 14 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22106785
DOI Link:
https://doi.org/10.5281/zenodo.22106785

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Impact Of Sri Lankan Tamil Migration on Globalized Human Capital and Global Economy

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Abstract
Migration has become one of the defining characteristics of globalization in the twenty-first century. Among the significant migration movements in South Asia, the migration of Sri Lankan Tamils represents a unique example of forced displacement evolving into a globally connected diaspora that contributes substantially to economic development, human capital formation, cultural exchange, entrepreneurship, and international knowledge networks. Beginning with post-independence ethnic tensions in Sri Lanka and intensifying during the civil war (1983–2009), millions of Sri Lankan Tamils established communities across Asia, Europe, North America, Australia, and the Middle East. Today, the Sri Lankan Tamil diaspora plays a pivotal role in shaping global labor markets, knowledge economies, innovation ecosystems, educational advancement, and transnational investments. This article examines the migration of Sri Lankan Tamils through the lenses of globalization, globalized human capital, and economic development while evaluating its social, cultural, political, and economic implications.

Keywords: *Globalization, Sri Lankan Tamil diaspora, migration, human capital, knowledge economy, globalization theory, international labor mobility, remittances, entrepreneurship.*

Introduction

Globalization has transformed national economies into interconnected systems characterized by the free movement of people, capital, knowledge, technology, and culture. Migration has emerged as one of its strongest pillars, enabling individuals to seek safety, education, employment, and entrepreneurial opportunities across borders.

The Sri Lankan Tamil migration represents one of the largest diaspora communities originating from South Asia. Initially driven by ethnic conflict, political instability, and civil war, migration later expanded through educational opportunities, skilled employment, family reunification, and international business networks.

Unlike many refugee communities that remain economically marginalized, Sri Lankan Tamils have become highly educated professionals, entrepreneurs, academics, healthcare workers, engineers, researchers, IT specialists, and business leaders across numerous developed economies. Their experiences illustrate how forced migration can eventually contribute positively to global human capital formation.

Historical Background of Srilankan Migration

The migration occurred in several distinct phases.
Phase I (1956–1983): **->** Increasing ethnic tensions, -> Language policies, -> Educational discrimination, ->

Limited employment opportunities

Migration destinations include: -> India, -> United Kingdom, -> Malaysia, -> Singapore
Phase II (1983–2009): The civil war caused mass displacement. Major destinations include: 1.) Canada, 2.) United Kingdom, 3.) Australia, 4.) France, 5.) Germany Switzerland, 7.) Norway, 8.) Denmark, 9.) Netherlands, 10.) United States New Zealand. During this period many migrated as refugees.
Phase III **(2009–Present):** Following the end of the civil war, migration increasingly occurred through: -> Higher education, -> Skilled migration, -> International employment, -> Entrepreneurship, -> Family reunification, ->

Business investments

Global Distribution of the Sri Lankan Tamil Diaspora Today, Sri Lankan Tamil communities are established across: Canada, United Kingdom, Australia, Switzerland, Denmark, Netherlands, Australia, Germany, Norway, Sweden, New Zealand, Singapore, South Africa.

How to Cite this Article:
V. Pattammal. (2026). Impact Of Sri Lankan Tamil Migration on Globalized Human Capital and Global Economy. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 85–89. https://doi.org/10.5281/zenodo.22106785

United States, India, Malaysia. These communities maintain strong transnational connections while integrating into the host societies. Migration and the Principles of Globalization

The Sri Lankan Tamil diaspora exemplifies several core principles of globalization.

Mobility of Human Capital: Globalization enables individuals to move where their skills are valued**.** Sri Lankan Tamil professionals have entered sectors including**:** 1. Medicine, 2. Engineering, 3. Artificial Intelligence, 4. Software development, 5. Banking, 6. Finance, 7. Biotechnology, 8. Higher education, 9. Research, 10. Public administration. Their mobility demonstrates the international circulation of talent.

Knowledge Transfer: Migrants carry knowledge across borders. Sri Lankan Tamil academics and professionals contribute to: Universities, Research laboratories, Hospitals, Technology companies, Innovation ecosystems

Knowledge generated in one country benefits institutions worldwide.

Cultural Globalization: Migration has spread Tamil language, literature, music, cinema, dance, cuisine, and religious traditions globally. Major cities now host: Tamil cultural festivals, -> Hindu temples, -> Tamil schools, -> Literary organizations, -> Classical music academies, -> Bharatanatyam institutions These activities strengthen multicultural societies.

Global Networks: Diaspora communities establish networks connecting: Businesses, -> Universities, -> NGOs, -> Governments, -> Investors, -> Researchers. These networks facilitate global collaboration.

5. Globalized Human Capital: Human capital consists of education, knowledge, skills, competencies, health, creativity, and innovation. Migration transformed Sri Lankan Tamils into globally competitive professionals.

Educational Achievement: Second-generation migrants exhibit exceptionally high participation in: Engineering, -> Medicine, -> Computer Science, -> Law, -> Business Administration, -> Data Science, -> Artificial Intelligence, -> Economics. Education became the primary mechanism for upward mobility.

Professional Excellence: Across developed economies, Sri Lankan Tamils occupy positions as**:** -> Physicians, -> Surgeons, -> Professors, -> Researchers, -> Scientists, Engineers, -> Entrepreneurs, -> Chartered accountants, -> Lawyers, -> Software architects, -> Financial analysts. These professionals contribute significantly to productivity and innovation.

Contribution of Srilankan Tamils' to the Global Economy

Labor Market Participation: Sri Lankan Tamil migrants fill skill shortages in developed countries. Examples include: Healthcare, -> Information Technology, -> Construction, -> Engineering, -> Financial services, -> Education. Their participation supports economic growth and productivity.

Entrepreneurship: Thousands have established businesses including: Restaurants, -> Supermarkets, -> IT firms, -> Consulting companies, -> Logistics firms, -> Real estate enterprises, -> Import-export businesses, -> Healthcare services. These enterprises generate employment and tax revenues.

6.3 Examples of Noted Sri Lankan Tamils with professional background

Personality	Country	Field	Major Achievement
S. Rajaratnam	Singapore	Politics	Founding Foreign Minister of Singapore and one of the principal architects of modern Singapore's foreign policy and multicultural national identity.
Ananda Krishnan	Malaysia	Business	One of Southeast Asia's leading entrepreneurs, building interests in telecommunications, media, energy, and infrastructure. Frequently listed among Malaysia's wealthiest business leaders.
V. V. Ganeshananthan	United States	Literature	Award-winning novelist and journalist whose work on the Sri Lankan civil war, including ***Brotherless Night*****,** has received international recognition.
Nirj Deva	United Kingdom	Politics	Former Member of the European Parliament and an internationally active parliamentarian of Sri Lankan Tamil heritage.
Aravinth Kumarasamy	Singapore	Performing Arts	Internationally acclaimed choreographer whose production ***Agathi*** explores the refugee experience and has toured globally.

Innovation: Highly skilled migrants contribute to**:** Artificial Intelligence, -> Machine Learning, -> Medical research, **->** Pharmaceutical development, -> Cyber-security, -> Renewable energy, -> Digital finance

Innovation drives competitiveness within host economies.

Remittances: Remittances sent to relatives in Sri Lanka support: Education, -> Healthcare, -> Housing, -> Small businesses, -> Agricultural development, -> Community welfare. These financial flows contribute to poverty reduction and local development.

Social Capital and Diaspora Networks: The Sri Lankan Tamil diaspora has developed strong social institutions. These include: Community organizations, -> Alumni associations, -> Professional societies, -> Religious institutions, -> Charity organizations, -> Educational foundations These networks facilitate: Career development, -> Mentorship, -> Scholarships, -> Disaster relief, -> Community development, -> International partnerships

Digital Globalization: Digital technologies have transformed diaspora engagement. Modern communication enables: Online education, -> Virtual businesses, -> Remote employment, -> International consulting, -> Telemedicine, -> Digital entrepreneurship. Social media platforms connect global Tamil communities in real time.

Contributions to Education: Education remains central to the diaspora. Contributions include: Scholarships, -> School development, -> University collaborations, -> Research partnerships, -> Academic conferences, -> Student mentoring, -> STEM education

Many professionals mentor younger generations worldwide.

Economic Benefits to Host Countries

Host economies benefit through:

- Increased Productivity: Highly skilled migrants enhance workforce quality.
- Innovation**:** Research and development activities expand.:
- **Entrepreneurship**: New enterprises stimulate local economies.
- Tax Contributions**:** Professional employment increases government revenues.
- Consumer Spending: Growing purchasing power supports domestic demand.

11. Economic Benefits to Sri Lanka: Although migration resulted in brain drain, it also generated significant long-term advantages. These include: -> Foreign remittances, -> Knowledge transfer, -> International investments, -> Tourism promotion, -> Global trade connections, -> Philanthropy, -> Educational assistance

Diaspora investment can support post-conflict reconstruction and regional development.

Brain Drain versus Brain Gain: One of globalization's central debates concerns whether migration weakens or strengthens countries of origin.

Brain Drain: Negative effects include: -> Loss of skilled professionals, -> Reduced research capacity, -> Healthcare shortages, -> Academic talent migration

Brain Gain: Positive effects include: -> International experience, -> Technology transfer, -> Research collaboration, -> Foreign investment, -> Return migration, -> Knowledge exchange Increasingly, scholars emphasize "brain circulation," where expertise flows between countries rather than remaining permanently in one location.

Challenges Faced by the Diaspora: Despite many achievements, Sri Lankan Tamil migrants have encountered challenges. These include: **->** Refugee trauma, -> Cultural adaptation, -> Language barriers, -> Employment discrimination, -> Credential recognition issues, -> Identity negotiation, -> Intergenerational differences, -> Mental health concerns

Many communities have demonstrated resilience through education, entrepreneurship, and social cohesion.

Theoretical Perspectives: Several theories help explain the experience of Sri Lankan Tamil migration.

Human Capital Theory: Investment in education increases productivity and earnings.

Push–Pull Theory: Conflict and insecurity push migration, while safety and opportunity pull migrants toward **host countries.**

Transnationalism: Migrants maintain simultaneous social, economic, and political connections with both home and host countries.

Network Theory: Established diaspora communities reduce migration costs and facilitate settlement for new arrivals.

Globalization Theory: Global interconnectedness enables the movement of people, knowledge, capital, and culture across national borders.

Case Illustrations

Canada: The Sri Lankan Tamil community has become active in business, healthcare, education, law, public administration, and civic participation, while contributing to Canada's multicultural society.

United Kingdom: Professionals have made notable contributions in medicine, engineering, finance, higher education, entrepreneurship, and public service.

Australia: Migrants have contributed to healthcare, engineering, higher education, information technology, and small business development.

France, Germany, and Switzerland: These communities have established cultural organizations, educational institutions, businesses, and professional associations that strengthen both local integration and transnational ties.

Future Directions: The future role of the Sri Lankan Tamil diaspora is likely to expand in: -> Artificial Intelligence, -> Digital entrepreneurship, -> Biotechnology, -> Climate adaptation, -> Global healthcare, -> Higher education, -> International trade, -> Venture capital, -> Innovation ecosystems, -> Social entrepreneurship Digital globalization will continue to reduce geographical barriers, enabling greater collaboration across borders.

Policy Suggestions and Recommendations on Immigration: Lessons drawn from the Sri Lankan Tamil Diaspora

The migration of Sri Lankan Tamils demonstrates that immigration policies should distinguish between security risks, humanitarian protection, and long-term economic integration. Initially arriving as refugees fleeing civil conflict, many Sri Lankan Tamils have become highly educated professionals, entrepreneurs, academics, healthcare workers, engineers, and public servants across Canada, Europe, Australia, and the United States. Their experience illustrates that well-designed immigration systems can convert humanitarian admissions into long-term human capital and economic gains.

At the same time, contemporary immigration debates are shaped by different national contexts. India faces concerns over irregular cross-border migration, particularly in relation to Bangladesh. The United States has intensified immigration enforcement through Immigration and Customs Enforcement (ICE). Europe is grappling with rising political polarization, anti-semitism and broader challenges related to social cohesion and extremist ideologies. These contexts require tailored policy responses that uphold security while protecting human rights and maximizing the benefits of migration.

Recommendations for India: 1. Differentiate Refugees from Irregular Economic Migration, 2. Develop a Comprehensive Refugee Framework, 3. Strengthen Border Governance, 4. Invest in Human Capital, 5. Promote Community Integration

Recommendations for the United States: 1. Maintain Strong Enforcement with Due Process, 2. Expand Merit-Based Human Capital Migration, 3. Improve Refugee Integration, 4. Encourage Diaspora Entrepreneurship, 5. Promote Community Partnerships

Recommendations for the European Union: 1. Harmonize Asylum Procedures, 2. Integrate Security and Humanitarian Objectives, 3. Promote Civic Integration, 4. Address Hate, Extremism, and Discrimination, 5. Leverage Diaspora Human Capital

Recommendations for Canada: 1. Continue Human Capital-Oriented Immigration, 2. Strengthen Credential Recognition, 3. Expand Community Sponsorship, 4. Support Second-Generation Success. 5. Promote International Development Partnerships

Cross-Cutting Recommendations

Across all jurisdictions, several common principles emerge:

1. Differentiate refugee protection from broader immigration management, ensuring that humanitarian obligations and border security are addressed through distinct but complementary processes.
2. Invest in education, skills development, and credential recognition, enabling migrants to contribute effectively to host economies.
3. Strengthen security screening through evidence-based, proportionate measures that protect national security while respecting due process and human rights.
4. Facilitate lawful employment and entrepreneurship, reducing dependency and enhancing economic participation.
5. Promote social cohesion through language learning, civic education, and community engagement, while combating discrimination, xenophobia, anti-semitism, Islamophobia, and other forms of hate.
6. Engage diaspora communities as partners in innovation, trade, investment, and international cooperation, recognizing their role in fostering transnational knowledge networks and economic development.
7. Improve international cooperation on migration governance, including information sharing, refugee protection, and efforts to address the root causes of forced displacement.

Conclusion

The migration of Sri Lankan Tamils has evolved from a response to conflict into a compelling example of how globalization can transform displaced populations into globally connected contributors to economic growth, innovation, and human capital development. Through education, entrepreneurship, professional excellence, cultural preservation, and transnational engagement, the Sri Lankan Tamil diaspora has enriched host societies while maintaining enduring ties with Sri Lanka.

Their experiences illustrate the dynamic relationship between migration, globalization, and development, demonstrating that the movement of

people can generate not only economic value but also social resilience, cultural diversity, and global knowledge exchange. While challenges such as brain drain, integration, and identity remain, the long-term trajectory highlights the importance of inclusive migration policies and diaspora engagement strategies that harness the potential of globalized human capital for sustainable development.

Further the experience of the Sri Lankan Tamil diaspora demonstrates that migration policy is most effective when it balances security, humanitarian protection, economic development, and social integration**.** Countries that invest in education, skills recognition, and inclusion can transform displaced populations into contributors to innovation, entrepreneurship, public service, and economic growth. At the same time, legitimate concerns regarding irregular migration, border management, and public safety require transparent legal frameworks and effective enforcement. A balanced, evidence-based approach allows governments to uphold national interests while realizing the long-term benefits of globalized human capital.

Financial support and sponsorship
Nil.

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

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Manuscript ID:
TIJCMBLIR-2026-030416

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 17 July 2026

Revised: 27 July 2026

Accepted: 14 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22106850
DOI Link:
https://doi.org/10.5281/zenodo.22106850

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Freedom Of Expression Vs. State Regulation: An Analytical Study of Cinematographic Censorship

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Abstract
Freedom of speech and expression is a fundamental right guaranteed under Article 19(1)(a) of the Constitution of India and forms an essential foundation of a democratic society. Cinematographic films are an important medium of expression, entertainment, education, and social awareness, and therefore their regulation raises significant constitutional concerns. This paper critically examines the relationship between freedom of expression and state regulation in the context of cinematographic censorship in India. It analyses the constitutional restrictions under Article 19(2), particularly the grounds of decency and morality, public order, security of the State, defamation, and incitement to an offence. The study also examines the role and powers of the Central Board of Film Certification (CBFC) under the Cinematograph Act, 1952, along with the changes introduced through the Cinematograph (Amendment) Act, 2023 and the Cinematograph (Certification) Rules, 2024. Further, the paper discusses important judicial decisions concerning film censorship and artistic freedom, including K.A. Abbas v. Union of India, Rangarajan v. P. Jagjivan Ram, Bobby Art International v. Om Pal Singh Hoon, and other significant cases. The analysis highlights the need to maintain a balance between artistic freedom and legitimate public interests. It concludes that restrictions on cinematic expression must be reasonable, proportionate, non-arbitrary, and firmly grounded in constitutionally permissible limitations, while respecting the audience's right to make informed choices.

Keywords: *Freedom of Expression, Cinematographic Censorship, Article 19(1)(a), Article 19(2), Central Board of Film Certification, CBFC, Cinematograph Act, Artistic Freedom, Decency and Morality, Film Certification, Judicial Review, Indian Constitution.*

Introduction:

India is the largest democracy in the world. Democracy means that the people choose their government through free and fair elections. In a democratic country, citizens have the right to express their opinions, criticize the government, and participate in public affairs. The media is often called the "Fourth Pillar of Democracy" because it supports the Legislature, Executive, and Judiciary by informing the public and holding those in power accountable. The Constitution of India does not specifically mention the "freedom of the press." However, the Supreme Court has held that freedom of the press is part of the Right to Freedom of Speech and Expression under Article 19(1)(a) of the Constitution. Therefore, a free and independent media is essential for maintaining democracy. Media may be divided broadly into two categories; namely, Print media and electronic media. Print media consist of books, magazines and newspapers, whereas media are radio, television, satellite Tv, Cinema, films, Etc.

The Constitutional Restriction:

The preamble to the constitution of India provides to the citizen of India, liberty of though, expression and belief. Article 19(1)(a) guarantees the freedom of speech and expression. The Indian Constitution does not employ the term "freedom of the press" unlike the Constitution of USA, which expressly mentions 'the liberty of the press. Through various landmarks judicial pronouncements, judiciary includes freedom of Press under Article 19(1) (a) i.e. freedom of speech and expression. Like any other freedom, freedom of press is also not an absolute freedom. This freedom can restrict by state according to Article 19(2) and Article 19(2) provided for the exceptions to these freedoms. Constitution of India in Article 19(2) attempts to strike a balance between individual liberty and state authorises by which the state can impose certain reasonable restrictions. But Article 19(2) was amended twice—first in 1951 and again in 1963 in order to put more restriction on freedom of expression.

How to Cite this Article:
Agarwal, M. P. (2026). Freedom Of Expression Vs. State Regulation: An Analytical Study of Cinematographic Censorship. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 90–93. https://doi.org/10.5281/zenodo.22106850

Thus, Article 19(2) now enables the legislature to impose reasonable restrictions in the public interest on the right of freedom of speech and expression on the following grounds: (a) security of the state; (b) friendly relations with foreign states; (c) public order; (d) decency or morality; (e) contempt of court; (f) defamation; (g) incitement to an offence; and (li) sovereignty and integrity of India.

Among the various grounds mentioned above one is 'Decency and morality' on which restriction can be imposed on the freedoms of press. It means entertainment of people subject to decency and morality.

Therefore, to put restriction on freedom on press, different statutory bodies and ministries constituted by the Indian Government, depending on the medium. such as the Central Board of Film Certification (CBFC) for films, the Press Council of India for print, and the Ministry of Information and Broadcasting for digital and broadcast media.

Films /Movies:

Films are considered as a one of the important tools for entertain, educate, awareness. India is one of the largest producers of motion pictures in the world. Encompassing three major spheres of activity- Production, distribution and exhibition, the industry has an all-India spread, employing thousands of people and entertaining millions each year. The various laws in force regulating the making and screening of films.[1] Although the Constitution of India does not explicitly mention motion pictures as a medium of speech and expression, the Supreme Court's decision in the case of *Rangarajan v. P. Jagjivan Ram*[2] established that movies are indeed protected under Article 19(1)(a).

The Cinematograph Act, 1952

The Cinematograph Act, 1952 was enacted to make provisions for the certification of cinematograph. Therefore, Board of Certification was constituted under the said Act. This Act also founded advisory panels at the regional levels to make recommendations to the Board. After examining a film, if the Board is satisfied then the Board may grant necessary certificates for public views.

According to Sec 5 (1) A film shall not be certified for public exhibition if, in the opinion of the authority competent to grant the certificate, the film or any part of it is against the interests of [1][the sovereignty and integrity of India] the security of the State, friendly relations with foreign States, public order, decency or morality, or involves defamation or contempt of court or is likely to incite the commission of any offence. (2) Subject to the provisions contained in sub-section *(1)*, the Central Government may issue such directions as it may think fit setting out the principles which shall guide the authority competent to grant certificates under this Act in sanctioning films for public exhibition.

Thus, as per the provisions of the Cinematograph Act, on the ground of decency and morality, issuance of a certificate for public exhibition may be withheld by the Board and the Central Government may also issue certain directions in this connection if it thinks fit.

There are structural transformations by the Cinematograph (Amendment) Act, 2023 and operationalized by the Cinematograph (Certification) Rules, 2024.

Following landmark judicial rulings, the central government no longer retains the power to order a revision or recall of a film that has already been officially certified by the CBFC.

The concept of Censorship:

Censorship means an order directing a person not to write or publish anything or deliver any speech about the matter prohibited to be made public or not to show any objectional scence in any film.[3] From the moment somebody figured out that the new medium of 'moving pictures' could be used to show images that might not be suitable for all ages and all life-styles, the movement toward movie censorship began. In short, the film censor means cutting the 'indecent' material.

Concept of indecency and obscenity:

Oxford New English Dictionary defines obscene as "offensive to modesty or decency expressing or suggesting and unchaste and lustful ideas; impose, incident, lewd." In Ranjit D. Udeshi V. state of Maharashtra[4] Hon'ble Supreme Court defined, Obscenity as,'the quality of being obscene which menas offensive to modesty or decency; lewd, filthy and repulsive.' 'Indecency' is a concept wider than 'obscenity'. Although anything that is 'obscence' must necessarily be 'indecent', what is 'indecent' need not always be 'obscene'. 'indecent' merely means nonconformance with accepted standards of morality, 'obscenity' refers to that which has prurient or lascivious appeal.[5]

The understanding of what is decent and moral, and what can be counted as obscene has been a topic of discussion for numerous years. Cultural practices, standards, regulations, and various interconnected elements have shaped the understanding of what constitutes morality throughout the years. What can be regarded as obscene or contrary to decency and morality has relied on society, which is fundamentally diverse, multifaceted, and significantly varying across various historical eras and geographical areas in geography. What is counted as immoral and obscene for some may be within the confines of decency for another.

Films in contemporary times and Role of Central Board of Film Certification: An analysis

[1] Rodney D. Ryder, "Media Law", Bloombury Publishing india Pvt. Ltd, ISBN 978-93-88912-62-4, P.no 24

[2] 1989 (2) SCC 574

[3] Dr. S.R. Myneni, "Mass Media Law", Hind Law House, 4th Edition 2023, P.no 288

[4] AIR 1965 SC 881

[5] Madhavi Goradia Divan, "Facets of Media Law', "Eastern Book company",1st Ed. 2006, ISBN: 81-7012-983-4, P.no 53

In modern technology era the television, internet and other such electronic media in the name of entertainment or modernization are continuously spreading certain vulgar and obscene material which cannot be consider as proper. On the other hand, Movies have transformed from primarily serving as a source of entertainment to something more meaningful. It became a one of the effective tools to represent Indian Society, culture, diversity, achievements, Problems both at national and international level. Due to the extraordinary levels of enthusiasm, marketing efforts, and financial figures involved, it is only right to state that Indian movies attract significant attention from both local and global audiences as well. Many social problems represent in Cinemas and through that it creates social awareness. [6]
The Central Board of Film Certification with advisory panels at regional centres is empowered to examine every film and sanction it-whether for unrestricted exhibition or for exhibition restricted to adults. The board is also empowered to refuse to sanction a film for public Exhibition.
In 2003, the Board banned the film 'Gulabi Aaina', a film on Indian transsexuals produced and directed by Sridhar Rangayan. The censor board cited that the film was 'Vulgar and offensive'. The film maker appealed twice unsuccessfully. The film remains banned in India, but has screened at numerous festivals all over the world and won awards. International critics have applauded it for its 'sensitive and touching portrayal of Marginalised community.'[7] There are number of film/scenes Screened without cuts in countries like US & UK and faces ban or censor in India, the obvious question of "why is there a problem here?".
In 2002, the Indian film maker and former chief of the Country's film censor board, Vijay Anand, kicked up a Controversy with proposal to legalise the exhibition of X- rated films in selected cinemas across the country, saying "Porn is shown everywhere in India clandestinely…and the best way to fight this onslaught of blue movies is to show them openly in theatres with legally authorized licences." He resigned within a year after taking charge of the censor Board after facing widespread criticism of his movies.[8]
In 2018, the CBFC required the makers of 'Aiyaary' to obtain clearance from the Defence Ministry before its release. The film addressed the 'Adarsh Housing Society scam' involving high-profile individuals. After a special screening for officials and making recommended cuts, the film received a censor certificate. In 2016,"The Jungle Book" received a U/A certification from the board, despite being based on a well-known children's classic.[9]
CBFC has not been treating every film equally. CBFC has sometimes shown bias. Its susceptibility to political bias, inherent in government appointment of all members, has produced regulatory decisions that systematically favour dominant political and cultural narratives while suppressing dissenting, minority, and subaltern voices. Films addressing political critique, caste discrimination, LGBTQ+ identities, and religious satire have faced disproportionate censorial burdens.[10]
The Board's excessive discretion permits the imposition of personal moral preferences under the guise of objective standards.

Judiciary vs Central Board of Film Certification: an overview

The Cinematograph Act provides for an appeal against the order of the Board before the High Court. Such cases are dealt with in accordance with the outcome of the judicial proceedings.
Hon'ble Supreme Court has established that cinematic expression is fully protected by Article 19(1)(a); that restrictions must be grounded in Article 19(2) grounds and proportionate to the harm sought to be prevented; that the State cannot suppress a film merely because its content is politically inconvenient; and that the standard of audience impact is the resilient democratic citizen, not the hypersensitive viewer. It is stated by hon'ble Supreme Court of India that, the phrase reasonable restriction connotes that the limitation imposed on a person in the enjoyment of the right shall not be arbitrary or of an excessive nature, beyond what is required in the interest of public.[11]
State cannot restrict the freedom of film unless and until this restriction are reasonable. In determining reasonableness of the restriction Judiciary applies the principle of ordinary prudent man.
***In, K.A. Abbas v. Union of India*[12]** The Supreme Court upheld film censorship as constitutional, but it established that artistic freedom must be afforded respect, and censorship ought not to be arbitrary. The Supreme Court has held that, "it is not the element of rape, leprosy, sexual immorality which should attract the censor's scissors but how the theme is handled by the producer."

[6] Erick Costa, THE FILMMAKER AS AN AGENT OF SOCIAL CHANGE: CINEMATOGRAPHIC ART AND ITS IMPACT ON SOCIETY, RCMOS – Multidisciplinary Scientific Journal of Knowledge. ISSN: 2675-9128. São Paulo-SP, available at file:///C:/Users/PC/Downloads/Artigo_O+CINEASTA+COMO+AGENTE+DE+MUDAN%C3%87A+SOCIAL.pt.en.pdf, last seen at:8/8/2026
[7] Dr. S.R. Myneni, "Mass Media Law"," Hindi Law House', 4th Ed, ISBN-978-93-902227-96-9P.No 289
[8] Ibid
[9] https://www.bbc.com/news/world-asia-india-35984104, last seen on 6/8/2026
[10] SHAKTHI. V, CINEMA AND CENSORSHIP: A CRITICAL ANALYSIS UNDER INDIAN CONSTITUTION, INDIAN JOURNAL OF LEGAL REVIEW (IJLR), 6 (7) OF 2026, PG. 848-854, APIS – 3920 – 0001 & ISSN - 2583-2344. Available at file:///C:/Users/PC/Desktop/V6I795F.pdf, last seen at: 9/8/2026.
[11] Chintamen Rao v. State of Madhya Pradesh, A.I.R. 1951 S.C. 118.
[12] AIR 1971, SC 481

In Children's Film Society, India v. Central Board of Film Certification & Another[13], the movie 'Chidiakhana' depicted the story of a boy from Bihar with a dream of playing football and tackling social issues. The Central Board of Film Certification (CBFC) gave it a U/A rating, but the Children's Film Society contested this decision in the Bombay High Court. They wanted to screen the film in schools, but the CBFC demanded cuts before granting the U/A rating. The court criticized the board, emphasizing that it is a certifying body and not a censor board, and it does not have the authority to decide what people can watch. The court also reprimanded the board for ignoring serious social issues.

In recent times, the Abhishek Chaubey directorial effort Udta Punjab[14] which recounts the drug crisis in Punjab, entered into turbulent waters with the CBFC, resulting in a mass re-examination and dialogue on the ethics of film censorship in their current state in India. In this case, while the CBFC demanded a staggering 94 cuts and 13 pointers, the Bombay High Court cleared the film after ordering one cut, along with a disclaimer to the film.[15]

In ***Rajkapoor v. State***[16] Supreme Court Highlighted the delicate balance between artistic expression and moral standards, emphasizing that not all explicit content should be censored if it contributes to the narrative

The question of obscenity in films came up before the Supreme Court in ***Bobby Art International v. Om Pal Singh Hoon.***[17] The Supreme Court observed that "a film that carries the message that social evil is evil cannot be made impermissible and banned for public exhibition on the ground that it depicts the social evil. The scene of nudity and rape and the use of expletives (vulgar words) are in aid of the theme and intended not to arouse prurient (excessive interest in sex) or lascivious (sexual) thought but revulsion against the perpetrators (guilty) and pity for the victim." With this observation permission granted by the Supreme Court to the screening of the film "Bandit Queen".

Conclusion

Ultimately, the choice of what to watch should be left to the audience, and the censor board should not impose its views on what should or should not be seen. In today's rapidly changing world, where people encounter vast amounts of information daily through social networking, it is nearly impossible to keep something hidden for long. Even though some films are banned, they are readily available on piracy sites, undermining the purpose of the ban.

Censorship is, however, a restriction on the right of freedom of speech and expression and, as such, it must be exercised with great care and circumspection; the liberty openly to express one's view must be balanced against the need to forestall the potential harm resulting from an abuse of such liberty.

Acknowledgement

The author would like to express sincere gratitude to all those who provided valuable guidance and support in the completion of this research paper on "Freedom of Expression Vs. State Regulation: An Analytical Study of Cinematographic Censorship." The author is thankful to the academic institution and colleagues for their encouragement and constructive suggestions throughout the study.

Financial support and sponsorship

Nil.

Conflicts of interest

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

[13] Writ Petition No. 6965 of 2019

[14] Central Board of Film Certification v. Phantom Films Pvt. Ltd., Special Leave Petition (Civil) No. 16531 of 2016

[15] Kartikeya Anshu, CONSTITUTIONAL GUARANTEES FOR INDIAN CINEMA: A STUDY OF FILM CENSORSHIP IN ITS LEAD UP TO THE CINEMATOGRAPH (AMENDMENT), NLIU LAW REVIEW, VOLUME – XII, ISSUE – I, Available at https://nliulawreview.nliu.ac.in/wp-content/uploads/2023/07/Volume-XII-Issue-I.pdf, last seen at: 8/8/2026

[16] 1980 AIR 258

[17] 1996 INSC 595

Manuscript ID:
TIJCMBLIR-2026-030417

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 17 July 2026

Revised: 27 July 2026

Accepted: 14 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22107949
DOI Link:
https://doi.org/10.5281/zenodo.22107949

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Social Media's Role in Shaping Equity Investment Decisions: A Demographic and Behavioural Analysis of Investors in Banaskantha, Gujarat

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Abstract
In the contemporary financial landscape, social media platforms have emerged as powerful catalysts for stock market trends, transforming financial information into a ubiquitous social commodity. This study conducts a demographic and behavioural analysis of retail equity investors in the Banaskantha district of Gujarat to understand how digital exposure modifies decision-making. Utilising a quantitative descriptive research design with a sample of 100 respondents (N=100), the study employed a structured survey instrument validated with a Cronbach's Alpha of 0.918, indicating excellent internal consistency. Statistical analysis through Chi-Square tests revealed a well-balanced occupational distribution (p=0.512) but a statistically significant preference for "Moderate" (48%) and "Aggressive" (33%) investment styles (p=0.002). Furthermore, the study examined behavioural constructs such as Fear of Missing Out (FOMO), herd mentality, and finfluencer trust. ANOVA results indicated no statistically significant variance in trust between verified social media personalities and traditional news media (p=0.116). However, a marginal trend (p=0.078) suggests a growing recognition of social media's power to influence price movements. These findings culminate in the "finfluencer paradox": while social media triggers emotional reactivity and peer influence, regional investors in Banaskantha maintain a sophisticated level of caution, frequently cross-checking digital recommendations with official regulatory filings. This research establishes an empirical baseline for understanding how regional Indian investors balance modern digital pressures with traditional risk management.

Keywords: *Social Media Influence, Equity Investment, Behavioural Finance, Banaskantha Investors, Finfluencers, FOMO, Herd Mentality, Investment Decision-Making.*

Introduction

Background of the Study

The digital era has transitioned financial information from a niche expert domain into a common social commodity. In the contemporary landscape, social media platforms are no longer merely communication tools; they act as active variables that can significantly alter investor behaviour and market trends. Within the Indian context, the relationship between personal traits and financial choices is increasingly mediated by digital sentiment. This shift is particularly evident in regional markets like Gujarat, where exposure to digital content has become a primary driver in modifying the decision-making processes of retail investors.

Theoretical Framework and Behavioural Constructs

Investment intentions are rooted in psychological drivers that are increasingly influenced by digital platforms. This study identifies four primary behavioural constructs:

- **FOMO and Emotional Reactivity:** Emotional responses triggered by trending content can impair judgment, leading to anxiety and reactive decisions when investors observe high returns on assets they do not possess.
- **Herd Mentality and Peer Influence:** Online communities on platforms such as Telegram and WhatsApp foster a collective sentiment that may override independent fundamental analysis, encouraging investors to follow the "crowd."
- **Finfluencer Trust and Source Credibility:** The rise of financial influencers ("finfluencers") on visual platforms like YouTube has reshaped information consumption, though the credibility of their advice remains a subject of academic debate.

How to Cite this Article:
Vora, A. H., & Trivedi, K. A. (2026). Social Media's Role in Shaping Equity Investment Decisions: A Demographic and Behavioural Analysis of Investors in Banaskantha, Gujarat. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 94–97. https://doi.org/10.5281/zenodo.22107949

- **Digital Verification:** This represents the cautious behaviour of investors who cross-check social media "stock tips" against official regulatory data, specifically official NSE/BSE filings or SEBI-mandated disclosures.

Problem Statement and Research Gap

While broad studies exist regarding social media's impact on investment, there is a critical need for localized empirical data. Existing literature highlights a gap in understanding how specific demographics in secondary districts, such as Banaskantha, interact with digital financial content. This region presents a unique behavioural environment where traditional investment cultures intersect with modern digital influences. This study serves as a response to the "future roadmap" for localized research suggested by Singh and Chakraborty (2024), aiming to fill the void of granular data in North Gujarat.

Research Objectives

The study aims to achieve the following goals:

1. Analyse the demographic distribution and self-reported investment styles of Banaskantha investors.
2. Measure the internal consistency and reliability of behavioural constructs using a validated instrument.
3. Evaluate the level of trust placed in social media influencers compared to traditional news outlets.
4. Examine the role of digital verification in the decision-making process of local investors.

Significance of the Study

This research provides an empirical analysis of user behaviour by cross-referencing social media usage with actual platform activities among 100 regional respondents. By focusing on Banaskantha, the findings offer insights into how investors balance moderate risk appetites with the aggressive pressures of digital trends. This contributes to the broader understanding of Indian investor sentiment and serves as an empirical baseline for future comparative studies across different geographic regions.

Literature Review

The role of social platforms as active catalysts in the stock market is well-established, with digital exposure serving as a primary variable in modifying investor behaviour (Goyal & Yadav, 2024). To address the need for a "future roadmap" in this field, localized empirical research is essential to understand how regional demographics interact with global digital trends (Singh & Chakraborty, 2024). Psychological drivers, particularly emotional intelligence and risk behaviour, underpin investment intentions. The anxiety-driven reactivity characterized by FOMO (James & Seranmadevi, 2024) serves as a psychological precursor to the herd mentality often observed in digitised peer networks (Dadhich, 2026), where information shared on WhatsApp or Telegram may override independent fundamental analysis. Social media's mediation effect is significant in amplifying these biases and shifting risk perceptions (Sathya & Prabhavathi, 2023). Within the Indian market specifically, investor sentiment acts as a mediator between personality traits and financial choices (Kamath et al., 2023). Visual platforms, notably YouTube, have further shaped these decisions through the parasocial impact of "finfluencers" (Pandey et al., 2025), where the perceived relationship with the content creator influences equity choice. However, the credibility of these online personalities remains a point of contention. Research suggests that retail investors do not always blindly follow recommendations, often maintaining a gap between social media consumption and actual trust (Dalimunthe et al., 2023). This is particularly relevant when considering demographic nuances, as younger groups like Gen Z interact with digital financial factors differently than older cohorts (Ningtyas et al., 2024). Ultimately, empirical analysis of user behaviour on investment platforms confirms that social media usage is deeply intertwined with actual market activity (Maniy et al., 2023).

Research Methodology

Research Design

This study employs a quantitative and descriptive research design. The methodology is designed to measure specific behavioural variables and map the impact of digital platforms and influencers on the financial decision-making processes of the target population.

Population and Sample

The target population consists of retail equity investors residing in the Banaskantha district of Gujarat. A structured survey was utilized to collect data, resulting in a final processed sample size of 100 respondents (N=100).

Data Interpretation and Statistical Analysis

Reliability Analysis

To confirm the internal consistency of the research instrument, a reliability analysis was conducted on the 19 items measuring behavioural constructs.

Table 1:

Reliability Statistics	
Cronbach's Alpha	N of Items
0.918	19

The Cronbach's Alpha coefficient of 0.918 indicates "excellent" internal consistency. This high value validates that the survey items consistently and accurately measure the intended behavioural constructs among the respondents.

Demographic and Occupational Distribution

A Chi-Square goodness-of-fit test was used to examine the distribution of primary occupations among the investors.

Table 2:

Chi-Square Test	
Test Statistics	
	Primary Occupation
Chi-Square	1.340
df	2
Asymp. Sig.	0.512

The observed distribution shows that the sample is well-balanced: 37% are employed in the public or private sector, 35% are self-employed or in business, and 28% are non-working. With a p -value of 0.512, there is no statistically significant difference in participation across these categories, indicating a broad-based investor interest across diverse socio-economic strata in the region.

Analysis of Investment Styles

The study analysed self-reported investment styles to determine the risk appetite of the regional investor base.

Table 3:

Chi-Square Test	
Test Statistics	
	How would you describe your general investment style?
Chi-Square	12.620
df	2
Asymp. Sig.	0.002

The results are statistically significant (p=0.002), showing a clear preference for certain styles. Specifically, 48% of respondents identify as "Moderate" and 33% as "Aggressive," while only 19% choose a "Conservative" approach. Preliminary findings indicate that Banaskantha investors generally possess a higher risk tolerance, likely mediated by the rapid flow of digital content.

Finfluencer Trust and Credibility (ANOVA)

An Analysis of Variance (ANOVA) was conducted on three statements regarding influencer impact and credibility.

Table 4:

ANOVA						
		Sum of Squares	df	Mean Square	F	Sig.
Content shared by influencers or finance pages directly influences my investment thinking.	Between Groups	2.881	1	2.881	1.724	0.192
	Within Groups	163.759	98	1.671		
	Total	166.640	99			
I trust financial advice from verified social media personalities more than traditional news media.	Between Groups	3.988	1	3.988	2.515	0.116
	Within Groups	155.402	98	1.586		
	Total	159.390	99			
Social media activity plays a role in influencing the price movement of financial assets.	Between Groups	5.159	1	5.159	3.163	0.078
	Within Groups	159.881	98	1.631		
	Total	165.040	99			

Because the p -values for the first two statements (0.192 and 0.116) are greater than 0.05, there is no statistically significant variance, suggesting that the investor population holds uniform, somewhat cautious views on influencer advice. However, the p -value for Statement 3 (0.078) reflects a marginal trend approaching significance ($p < 0.10$). This suggests that while investors remain sceptical of individual influencers, they are beginning to collectively recognize the structural power of social media activity to move market prices. This nuance defines the "Finfluencer Paradox": a recognition of the platform's systemic influence despite a persistent lack of trust in its individual agents.

Conclusion

The data suggests that social media is a significant catalyst for investor behaviour in Banaskantha. While

digital platforms trigger emotional reactivity and peer-driven biases, regional investors demonstrate a sophisticated level of caution, balancing digital "tips" with traditional information and digital verification investors remain susceptible to FOMO and Herd Mentality, particularly regarding assets discussed in closed online communities like Telegram and WhatsApp. The "Finfluencer" Paradox: Investors maintain a uniform scepticism, neither fully adopting nor entirely rejecting social media advice. They recognize the market-moving power of digital platforms while maintaining source-level caution. The research underscores the need for robust "Digital Literacy Frameworks" that prioritize "Source Authentication" over "Advice Consumption." Regulatory bodies, such as SEBI, should enhance efforts to promote official filings and NSE data as the primary tools for cross-checking information encountered on social media platforms to mitigate the impact of unverified financial advice. Following the localized empirical baseline established by this study, future research should implement comparative studies between "Agrarian-heavy districts" and "Industrial secondary districts." Such research will validate whether the "Moderate/Aggressive" risk split and the "Finfluencer Paradox" observed in North Gujarat are unique to its specific socio-economic profile or representative of a broader national trend in India's retail investment landscape.

Acknowledgment
The author expresses sincere gratitude to all those who contributed directly or indirectly to the successful completion of the research paper entitled “Beyond the Gavel: Transgender Rights and Social Reality in India.” The author is deeply thankful to B. Raghunath ACS College, Parbhani, for providing the academic environment, institutional support, and encouragement necessary for undertaking this study.

Financial support and sponsorship
Nil.

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

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12. Comprehensive Review and Future Roadmap. *Paradigm: A Management Research Journal*.

Manuscript ID:
TIJCMBLIR-2026-030418

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 19 July 2026

Revised: 29 July 2026

Accepted: 16 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22199724

DOI Link:
https://doi.org/10.5281/zenodo.22199724

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Contours of the Right to Privacy in India: Constitutional Evolution and Judicial Interpretation

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Abstract
The recognition of privacy as a fundamental right in India represents a pivotal development in the country's constitutional law. While the original Constitution did not explicitly list privacy as a separate right, the judiciary has gradually expanded its scope within the framework of Article 21 which protects the right to life and personal liberty—and the broader guarantees outlined in Part III of the Constitution. Initial rulings, such as M.P. Sharma v. Satish Chandra (1954) and Kharak Singh v. State of Uttar Pradesh (1962), took a restrictive view, denying privacy constitutional protection. However, the Supreme Court has since adopted a more expansive interpretation of concepts like dignity, autonomy, and liberty, which paved the way for recognizing privacy as a constitutional right. The turning point came with the landmark decision in Justice K.S. Puttaswamy (Retd.) v. Union of India (2017), where a nine-judge bench unanimously held that the right to privacy is an essential component of the right to life and liberty. This ruling brought Indian constitutional law in alignment with international human rights frameworks, including Article 12 of the Universal Declaration of Human Rights and Article 17 of the International Covenant on Civil and Political Rights. This paper investigates the scope and evolution of the right to privacy in India, charting its development through major judicial decisions and exploring its relevance to modern-day concerns such as government surveillance, biometric data usage, and digital technology. Through a critical examination of case law, the study aims to explore how courts have navigated the tension between protecting individual freedoms and upholding legitimate state interests like national security and public order. Additionally, it analyzes the Digital Personal Data Protection Act, 2023, as a legislative response to privacy challenges. In conclusion, the paper emphasizes that although privacy has been constitutionally recognized, it remains a fluid and evolving area that must be continually reassessed in light of technological advances and shifting socio-political dynamics.

Keywords: *Right to Privacy, India Constitution, Fundamental Rights, Constitutional Evolution, Judicial Interpretation, Personal Liberty.*

Introduction

"Privacy is the constitutional core of human dignity. Privacy has both a normative and descriptive function. At a normative level, privacy subserves those eternal values upon which the guarantees of life, liberty and freedom are founded."

Justice D.Y. Chandrachud [1]

The recognition of the Right to Privacy as a fundamental right under the Indian Constitution is a watershed moment in constitutional jurisprudence. Initially overlooked by the framers of the Constitution and rejected by early court decisions, the right gradually gained recognition the landmark judgment in *Justice K.S. Puttaswamy (Retd.) v. Union of India* (2017) was a turning point that firmly established privacy as a core component of human dignity and liberty. rough judicial activism and progressive interpretations of Article 21. This paper traces the constitutional evolution of the right to privacy, analyzes pivotal judicial decisions, and discusses the contemporary challenges posed by surveillance, digital technologies, and data protection frameworks, including the Digital Personal Data Protection Act, 2023.

How to Cite this Article:
Sarwade, M. V. (2026). Contours of the Right to Privacy in India: Constitutional Evolution and Judicial Interpretation. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 98–105. https://doi.org/10.5281/zenodo.22199724

[1] Supreme Court of India, 2017, p. 266

The paper argues that while privacy is now judicially affirmed, it remains a dynamic and contested right requiring constant recalibration. The Indian Constitution, while one of the most detailed in the world, did not explicitly include the right to privacy as a fundamental right. However, the interpretative journey of the Supreme Court has gradually expanded the scope of Article 21, bringing privacy within its ambit. With increasing digitization, surveillance, and state interest in data, the discourse around privacy has become central to protecting individual autonomy and dignity.

Historical Background and Early Judicial Approach

In the early years after independence, Indian courts took a restrictive view of privacy. In *M.P. Sharma v. Satish Chandra*, the Supreme Court ruled that there was no constitutional right to privacy in search and seizure cases[2]. Similarly, in *Kharak Singh v. State of Uttar Pradesh*, the Court denied that surveillance violated any fundamental right; with the majority holding that privacy was not a guaranteed right[3]. Justice Subba Rao in dissenting opinion said,

"It is true our Constitution does not expressly declare a right to privacy as a fundamental right, but the right is an essential ingredient of personal liberty."[4] These decisions reflected the formalist judicial philosophy of the time, which interpreted fundamental rights narrowly, often deferring to state power in the interest of maintaining law and order.

What is the Right to Privacy?

Numerous meanings crowd in our mind that tries to analyze privacy. The privacy of private property, privacy as a proprietary, interest in name and image; privacy as the keeping of one's affairs to oneself; the privacy of internal affairs of a voluntary association or of a business corporation; the privacy of sexual and family affairs, etc.[5] The right to privacy is a core element of personal autonomy, enabling individuals to make private decisions without undue intrusion. It includes the ability to control personal data, maintain confidentiality, and exercise independent choice without external interference. The New Oxford Dictionary defines the meaning of 'Privacy' as 'absence or avoidance of publicity or display; the State or condition from being withdrawn from the society of others or from public interest; seclusion'[6] and the Cambridge Dictionary states that 'Privacy' is someone's right to keep their persona matters and relationship secret.[7] The idea of privacy is a natural concomitant of the idea of natural person. A person though the member of the society claims in regard to certain matters total non-interference by other persons and by the State of which he is a citizen. [8] *Professor Alan F. Westin* observes that the privacy is "the claim of individuals, groups, or institutions to determine for themselves when, how and to what extent information about them is communicated to others."[9]This right is vital for safeguarding human dignity and liberty. It empowers individuals to express themselves, form personal connections, and engage with society freely, without the threat of surveillance or unjust treatment. In the landmark 2017 judgment of *Puttaswamy v. Union of India*, the Supreme Court declared the right to privacy as a fundamental right protected under Article 21 of Part III of the Indian Constitution. In the case of *District Registrar and Collector, Hyderabad v. Canara Bank and Another* (2004), the Supreme Court highlighted those fundamental rights such as personal liberty, freedom of expression, and freedom of movement laid the foundation for the recognition of the right to privacy. The Court emphasized that privacy is inherently linked to individuals, and any intrusion into this right must be justified through proper legal means—either by legislative enactments, executive or administrative directives, or judicial orders.[10]

Human Rights and the Right to Privacy in India

Human rights are universally acknowledged as inalienable and fundamental for the dignity, liberty, and equality of individuals. Among these, the right to privacy has gained prominence in recent decades as a core component of personal freedom. In India, privacy was not originally an expressly guaranteed fundamental right under the Constitution of 1950. However, through evolving judicial interpretation and constitutional jurisprudence, privacy has been recognized as integral to the right to life and personal liberty under Article 21. This trajectory reveals the dynamic nature of human rights in India, shaped by global human rights discourse and domestic socio-legal developments. Privacy is now widely acknowledged as part of the second-generation human rights, linked not only to civil and political freedoms but also to human dignity. Internationally, instruments such as the Universal Declaration of Human Rights, 1948 (Article

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[2] M.P. Sharma v. Satish Chandra, AIR 1954 SC 300.
[3] Kharak Singh v. State of Uttar Pradesh, AIR 1963 SC 1295.
[4] Kharak Singh v. State of Uttar Pradesh, AIR 1963 SC 1295.
Supreme Court of India, 1962, p. 1306
[5] Fried C. (1968). Privacy. 77 Yale L.J. p. 478.
[6] The New Oxford Dictionary. (1993) (Volume 2)
[7] https://dictionary.cambridge.org
[8] Shukla B. M. (1979). The Right to Privacy and Indian Criminal Law.G.L.R.p.9.
[9] Westin Alan F. (1967). Privacy and Freedom. New York: Atheneum.p.7.
[10] Sargam Thapa, "The Evolution of Right to Privacy in India" International Journal of Humanities and Social Science Invention (February 2021), available at [https://www.ijhssi.org/papers/vol10(2)/Ser-1/J1002015358.pdf] (https://www.ijhssi.org/papers/vol10%282%29/Ser-1/J1002015358.pdf)

12) and the International Covenant on Civil and Political Rights, 1966 (Article 17) recognize privacy as a human right, prohibiting arbitrary interference with an individual's private life. India, as a signatory to these conventions, is under an international obligation to safeguard privacy. Yet, its domestic constitutional journey began with a restrictive stance, where courts in early cases like M.P. *Sharma v. Satish Chandra* (1954) and *Kharak Singh v. State of Uttar Pradesh* (1962) declined to treat privacy as a fundamental right, emphasizing instead the state's interests in surveillance and investigation.[11]

Judicial Recognition and Expansion

The tide turned with *Justice K.S. Puttaswamy (Retd.) v. Union of India* (2017), where a nine-judge bench unanimously held that the right to privacy is a constitutionally protected right, intrinsic to Article 21 and part of the freedoms under Part III.[12] The Court affirmed that privacy safeguards autonomy, dignity, informational self-determination, and decisional freedom, making it indispensable to a democratic society. This recognition placed India in alignment with global human rights standards, ensuring that privacy is not merely an abstract value but an enforceable right against both state and non-state actors. Importantly, the judgment emphasized proportionality: restrictions on privacy must satisfy legality, necessity, and proportionality, balancing individual rights with legitimate state interests such as national security.[13] Despite judicial recognition, the right to privacy in India faces structural challenges:

2.3.1. While the Digital Personal Data Protection Act, 2023 marks progress, concerns remain regarding broad exemptions for the state and inadequate accountability mechanisms. This dilutes the universality of privacy as a human right.

Programs like Aadhar, along with surveillance under laws such as the Information Technology Act, 2000 and the Telegraph Act, 1885, have raised fears of excessive state control. Critics argue that unchecked surveillance risks converting India into a "surveillance state," contrary to democratic values.[14]

. Privacy often collides with other rights and interests—such as transparency, public health, and national security. For example, data collection during the COVID-19 pandemic highlighted the tension between individual privacy and collective welfare.

Unlike traditional rights like equality or freedom of speech, privacy remains difficult to enforce due to lack of awareness, procedural complexity, and the absence of strong independent oversight institutions. The recognition of the right to privacy as a fundamental right in India represents a watershed in the country's human rights jurisprudence. It underscores the judiciary's role in harmonizing constitutional values with evolving global human rights norms. However, the real test lies in implementation. Privacy must not remain a lofty constitutional promise but should translate into everyday protection against arbitrary intrusion, corporate misuse of personal data, and state overreach. Strengthening legislative frameworks, ensuring transparency in surveillance, and fostering awareness among citizens are crucial steps to transform privacy into a lived reality for all Indians.

International Framework:

Privacy is an essential element of human life, shaped and understood differently across various cultural and legal contexts. This research paper explores the complex concept of privacy, focusing specifically on its legal and historical evolution in India. It aims to reveal the diverse and layered aspects of privacy, going beyond simple definitions to examine its many dimensions.[15] Global legal standards, such as Article 12 of the 1948 Universal Declaration of Human Rights and Article 17 of the 1966 International Covenant on Civil and Political Rights, prohibit "arbitrary interference" with an individual's privacy, family life, home, communications, dignity, and reputation.[16]

Shift towards an Expansive Interpretation

The shift began with the liberalization of Article 21's interpretation in the 1970s. In Maneka Gandhi v. Union of India, the Court ruled that the right to life and personal liberty must be interpreted broadly and cannot be curtailed except through a procedure that is just, fair, and reasonable[17]. Later cases such as *R. Rajagopal v. State of Tamil Nadu*[18] and *PUCL v. Union of India*[19] further expanded the ambit of privacy, recognizing it as implicit in Article 21. In Rajagopal, also known as the "*Auto Shankar*" case, the Court held that the right to privacy includes the right to be left alone and to control one's personal information.

The Puttaswamy Judgment: A Constitutional Milestone

The nine-judge bench decision in Justice K.S. Puttaswamy (Retd.) v. Union of India [20] marked a constitutional transformation. Overruling *M.P. Sharma and Kharak Singh*, the Court unanimously held that

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[11] M.P. Sharma v. Satish Chandra, AIR 1954 SC 300; Kharak Singh v. State of Uttar Pradesh, AIR 1963 SC 1295.

[12] Justice K.S. Puttaswamy (Retd.) v. Union of India, (2017) 10 SCC 1.

[13] Ibid.

[14] Apar Gupta, "The Supreme Court on Privacy: A Critical Analysis," 2 Indian J. Const. L. 45 (2018).

[15] Dr. Vivek Kumar Gupta, "The Right to Privacy in India: A Comparative Study with Global Implications" International Journal of Law, Justice and Jurisprudence 4(1) (2024) 240-246, available at [https://www.lawjournal.info/article/114/4-1-41-748.pdf] (https://www.lawjournal.info/article/114/4-1-41-748.pdf)

[16] "Right to Privacy, Evolution, Significance, Challenges..." (31 August 2025) Vajiram Editor, available at [https://vajiramandravi.com/upsc-exam/right-to-privacy/] (https://vajiramandravi.com/upsc-exam/right-to-privacy/)

[17] Maneka Gandhi v. Union of India, AIR 1978 SC 597.

[18] R. Rajagopal v. State of Tamil Nadu, AIR 1995 SC 264.

[19] PUCL v. Union of India, AIR 1997 SC 568.

[20] Justice K.S. Puttaswamy (Retd.) v. Union of India, (2017) 10 SCC 1.

privacy is a fundamental right rooted in dignity, liberty, and autonomy.

The judgment laid down a structured framework:

a) Privacy is not an absolute right.
b) Any infringement must meet the triple test: legality, necessity, and proportionality.
c) The right to privacy includes various facets—bodily integrity, informational privacy, and decisional autonomy. The Court aligned Indian jurisprudence with international norms such as Article 12 of the Universal Declaration of Human Rights and Article 17 of the ICCPR[21].

Dimensions of the Right to Privacy

Post-Puttaswamy, the right to privacy has been interpreted to include several sub-rights:

Bodily Privacy

In *Suchita Srivastava v. Chandigarh Administration*, the Court recognized reproductive autonomy as part of personal liberty[22].

Informational Privacy

The Aadhaar hearings brought to light concerns over the use and misuse of biometric data. In the Puttaswamy II (Aadhaar) case, the Court upheld the Aadhaar scheme with safeguards but struck down its mandatory linkage with private services[23].

5.3 Sexual Orientation and Identity

In *Navtej Singh Johar v. Union of India*, the Court decriminalized Section 377 IPC, recognizing that sexual orientation is an essential aspect of privacy and dignity[24].

Surveillance and State Power

UN Human Rights Committee – General Comment No. 16 on ICCPR (1988) rightly stated that, *"The gathering and holding of personal information on computers, data banks and other devices, whether by public authorities or private individuals or bodies, must be regulated by law. Effective measures have to be taken by States to ensure that such information does not reach the hands of persons who are not authorized by law to receive process and use it."*[25]

Surveillance presents one of the greatest challenges to privacy. The absence of a robust legal framework regulating state surveillance allows disproportionate invasions of privacy. In *PUCL v. Union of India,* the Court laid down procedural safeguards for telephone tapping, requiring authorization and oversight[26]. However, with the rise of mass surveillance tools and projects like the Central Monitoring System, concerns have intensified. The Pegasus spyware revelations highlighted the state's potential overreach. Despite petitions, the lack of clear findings and accountability remains a major concern[27].

Data Protection and the Digital Personal Data Protection Act, 2023

The increasing digitization of society has made data protection a key component of privacy. The Digital Personal Data Protection Act, 2023 was enacted to regulate the processing of personal data. Personal data refers to information that can be linked to a specific individual, either directly or indirectly. Both businesses and government agencies handle personal data to provide goods and services. Analyzing this data helps in understanding individual preferences, which can be beneficial for personalization, targeted marketing, and creating tailored recommendations? Additionally, the use of personal data can support law enforcement efforts.[28]

Key features include:

a) Consent-based data collection
b) Rights of data principals, including correction and erasure
c) Obligations on data fiduciaries
d) Data Protection Board of India as the regulatory body

However, the Act has drawn criticism for:

a) Exemptions granted to the state under vague terms
b) Lack of independence in the Data Protection Board
c) Dilution of key protections suggested in the Srikrishna Committee Report[29]

Balancing Privacy with State Interests

Courts have repeatedly emphasized that privacy is not absolute. The triple test from Puttaswamy—legality, necessity, and proportionality—form the standard for evaluating intrusions into privacy. For example, in *Anuradha Bhasin v. Union of India*[30], the Court examined internet shutdowns in Jammu & Kashmir under the proportionality framework and emphasized transparency and accountability in such decisions[31]. However, judicial enforcement of proportionality often remains weak due to lack of data, government non-cooperation, and procedural opacity.

Comparative Perspectives

Despite its recognition as a fundamental right, the Right to Privacy in India continues to face significant challenges, especially with the rapid growth of digital

[21] Universal Declaration of Human Rights, 1948, Art. 12; International Covenant on Civil and Political Rights, 1966, Art. 17.
[22] Suchita Srivastava v. Chandigarh Administration, AIR 2010 SC 235.
[23] K.S. Puttaswamy (Aadhaar-5J) v. Union of India, (2019) 1 SCC 1.
[24] Navtej Singh Johar v. Union of India, AIR 2018 SC 4321.
[25] United Nations Human Rights Committee, 1988, para. 10
[26] PUCL v. Union of India, AIR 1997 SC 568.
[27] Manohar Lal Sharma v. Union of India, W\. P. (Crl) No. 314/2021 (Pegasus case).
[28] The Digital Personal Data Protection Bill, 2023 available at: https://prsindia.org/billtrack/digital-personal-data-protection-bill-2023
[29] Report of the Committee of Experts under the Chairmanship of Justice B.N. Srikrishna on Data Protection (2018).
[30] Anuradha Bhasin v. Union of India, (2020) 3 SCC 637: AIR 2020 SC 1308.
[31] Ibid.

technologies and state surveillance. As of 2024, India has over 900 million internet users, with projections suggesting this number will exceed 1 billion by early 2025. This surge in internet usage has laid the foundation for pressing concerns around data privacy, particularly affecting vulnerable groups like women and children. Incidents of data breaches by corporations and unauthorized surveillance by major tech firms and government agencies have become increasingly frequent. The lack of a comprehensive legal framework for surveillance and persistent concerns over data security highlight the urgent need for stronger privacy protections. These trends reflect the ongoing tension between safeguarding individual privacy and addressing broader state interests such as national security and public welfare.[32] Globally, constitutional democracies have recognized privacy in various forms. The US Supreme Court has interpreted privacy under the Due Process Clause, while the EU enforces it rigorously through the General Data Protection Regulation (GDPR). The European Court of Human Rights in S. and *Marper v. United Kingdom* ruled that indefinite retention of DNA data violated Article 8 of the ECHR[33]. India's jurisprudence is gradually aligning with these global standards, though institutional capacity and state compliance remain concerns.

The right to privacy is widely regarded as a basic human right, safeguarding individuals from unjustified interference in their personal affairs, including their communications and private data. It plays a crucial role in areas such as surveillance, data security, and personal autonomy. Conducting a comparative analysis involves studying how various legal systems—such as those in different countries—interpret and uphold this right. This comparison helps to highlight similarities and differences in legal protections, offering insights into how privacy is maintained or challenged across diverse jurisdictions.

Right to be forgotten in India:

The "right to forget" generally refers to the notion that certain historical events should not be revived after a significant passage of time. In contrast, the "right to be forgotten" relates to an individual's claim to have personal data erased, preventing third parties from accessing or tracing it. This right is rooted in personal autonomy, granting individuals control over their information with a temporal dimension—the older the data, the stronger the individual's claim outweighs public interest.

In India, the right to be forgotten was first recognized by the Karnataka High Court in *Sri Vasunathan v. The Registrar-General* (2017). Interestingly, the idea of a "right to forget" had already been debated a decade earlier. However, it is important to distinguish between the two: while the right to forget and the right to be forgotten are often conflated, especially in online discussions, they represent different facets—the passive and active dimensions—of managing personal information.[34]

Suggestions

Although nearly a decade has passed since privacy was recognized as a Fundamental Right in India, a comprehensive privacy law is still lacking. For millions of Indians, privacy remains a distant ideal. In today's world, people are increasingly able to protect their physical and spatial privacy; however, the real and more complex challenge lies in safeguarding privacy within the digital realm. The digital space has essentially become an extension of the self—a virtual environment reflecting one's preferences, communications, behaviors, and personal choices. With the rapid expansion of data-centric technologies, advanced algorithms can now infer sensitive details about individuals, such as their health, education, emotions, and behavior. This level of data profiling and surveillance presents serious threats to both informational and decisional privacy, calling for a thorough re-evaluation of the current legal and ethical frameworks.

Enact a Comprehensive Statutory Tort of Privacy:

Although privacy is recognized as a right, current tort law and existing statutes make it difficult to claim remedies for non-digital privacy violations, such as intrusions or public disclosure of personal facts. A dedicated Privacy Tort Act should define such violations clearly, provide for compensation and injunctions, and lower the burden of proof for victims. This would effectively address physical and non-data-related intrusions.

Strengthen Protections for Vulnerable Groups:

Special attention must be given to the privacy rights of children, women, marginalized communities, and LGBTQIA+ individuals. Women and children need protection from stalking, voyeurism, and should have safe, private spaces in public areas like hostels, shelters, and restrooms. LGBTQIA+ individuals require confidentiality in accessing healthcare, support services, and personal relationships, and protection against forced 'outing'. Marginalized communities should be shielded from profiling and surveillance based on caste, religion, or ethnicity, especially in public or institutional spaces.

Safeguard Privacy in Residential Spaces:

Residential Welfare Associations (RWAs) are increasingly regulating private aspects of residents' lives, such as guest access, food habits, and religious

[32] Shodkosh Journal of Visual and Performing Arts (April 2024), "Evolution of Right to Privacy in India: Constitutional Perspective and Judicial Approach", Dr. Anupam Kurlwal Shreyansh

[33] S. and Marper v. United Kingdom, \[2008] ECHR 1581.

[34] Prashant Mali, "Privacy Law: Right to be Forgotten in India" NLIU Law Review 7 (15 October 2021), available at [https://nliulawreview.nliu.ac.in/wp-content/uploads/2022/01/Volume-VII-17-33.pdf] (https://nliulawreview.nliu.ac.in/wp-content/uploads/2022/01/Volume-VII-17-33.pdf)

practices. Legal boundaries must be set to limit such intrusions, allowing intervention only when actions within homes cause tangible harm to others.

Ensure Privacy in Judicial and Investigative Processes:

Victims' identities must be strictly protected. Section 228A of the IPC prohibits disclosing the identity of victims, but enforcement remains weak. Mandatory redaction of public records and sensitization of the police, judiciary, and media are essential. Additionally, media trials frequently violate the privacy of accused persons and their families. Even if the accused is under investigation, the privacy of their family members must be respected until guilt is legally established.

Empower and Democratize the Data Protection Authority:

The Digital Personal Data Protection Act, 2023 created a Data Protection Board, but concerns remain about its independence and centralized control. A truly rights-based approach requires a neutral and autonomous regulator. A multi-stakeholder composition—including judiciary, civil society, and privacy experts—should be involved in its formation and functioning.

Institutionalize the Right to Be Forgotten:

Individuals should have the right to manage their digital footprint and restore their reputation. Although Indian courts have acknowledged the concept post-Puttaswamy, there is no enforceable law. A structured legal framework should define when and how personal data can be removed from public access, balance this right with freedom of expression, and establish a review mechanism involving both courts and the data protection authority.

Promote Privacy Education in Schools and Institutions:

A fundamental right is meaningful only if people are aware of it. Privacy education is lacking, especially among youth and rural populations.

The government should:

a) Integrate digital privacy and consent awareness into school curricula
b) Run mass media campaigns on surveillance and data rights
c) Train public officials on data handling, retention, and sharing practices

Embed Privacy in Policy Design and Governance:

All government digital initiatives—such as Health ID, DigiLocker, and e-SHRAM—must include privacy impact assessments from the planning stage. Institutions like NITI Aayog should develop privacy-centric policy templates, ensuring that respect for privacy becomes a core element of public administration and digital governance.

Restrict Aadhar Use to Approved Purposes Only:

a) Forcing biometric identity in areas beyond welfare distribution, like school admissions or mobile number linkage, goes against the principles of Puttaswamy and bodily autonomy.
b) Citizens should have the choice to opt out or unlink Aadhar
c) Unauthorized use of Aadhar for profiling must be penalized
d) The introduction of masked Aadhar is a positive step, but enforcement must be ensured

Implement an Informed Consent Framework:

To protect digital privacy, websites should not rely on vague, blanket consent ("I Agree") statements. Instead, users should be given the option to selectively consent to specific types of data processing, similar to the General Data Protection Regulation (GDPR) model in the European Union.

Conclusion

The recognition of the right to privacy as a fundamental right in India is a significant judicial achievement. However, the right remains vulnerable in practice due to legislative gaps, executive overreach, and weak regulatory mechanisms. With technological advancements such as AI, facial recognition, and data analytics, the threats to privacy are evolving rapidly. There is a pressing need for a comprehensive and enforceable data protection regime, stronger safeguards against surveillance, and continued judicial vigilance. Privacy is not a static right—it must be actively protected and constantly reinterpreted in light of changing realities. The legal recognition of privacy as a fundamental right in India has evolved gradually, beginning in the early years following the adoption of the Constitution. One of the first cases to touch upon the issue of privacy, albeit indirectly, was *Kharak Singh v. State of Uttar Pradesh*. In this case, the Supreme Court examined the constitutional validity of police surveillance as outlined in the Uttar Pradesh Police Regulations. The petitioner argued that these practices infringed upon his fundamental rights under Article 21. Although the Court struck down some provisions as unconstitutional, it refrained from explicitly identifying a separate right to privacy and largely dismissed the broader notions of personal liberty and protection from arbitrary state intrusion.[35]

The judicial understanding of the Right to Privacy in India has transformed over time—from an unacknowledged idea to a well-established fundamental right. This progression has significantly influenced modern concerns like data protection, government surveillance, and emerging technologies, helping to ensure the protection of individual privacy in today's digital era.[36]In India, the development of the

[35] "The Right to Privacy in India: Constitutional Provisions, Judicial Evolution, and Future Challenges" (28 March 2025), available at [https://www.ipandlegalfilings.com/the-right-to-privacy-in-india-constitutional-provisions-judicial-evolution-and-future-challenges/]

(https://www.ipandlegalfilings.com/the-right-to-privacy-in-india-constitutional-provisions-judicial-evolution-and-future-challenges/)

[36] https://www.drishtiias.com/mains-practice-question/question-8415

right to privacy reflects the judiciary's dynamic and evolving interpretation of the Constitution. From its initial rejection in early rulings to its tentative acceptance in the Govind case[37] and ultimate affirmation in Puttaswamy, the courts have been instrumental in broadening the scope of fundamental rights. The Puttaswamy verdict not only recognized privacy as a fundamental right but also established a comprehensive framework rooted in dignity, autonomy, and proportionality, setting a global precedent. Crucially, the Court went beyond mere recognition—it introduced a structured proportionality test to evaluate privacy violations, laid down normative benchmarks for future laws, and highlighted the connection between privacy, human dignity, autonomy, and life in the digital age. This doctrinal precision gave the right to privacy both conceptual depth and practical relevance. The subsequent enactment of the Digital Personal Data Protection (DPDP) Act, 2023, reflects how judicial rulings have influenced legislative action in addressing modern privacy concerns. As India continues to confront the challenges of the digital era, the principles laid out in Puttaswamy will remain essential in mediating the tension between individual rights and collective interests, ensuring privacy serves as a meaningful protection of personal dignity. Ultimately, India's privacy jurisprudence exemplifies how judicial interpretation can give substance to constitutional gaps, turning abstract freedoms into real safeguards. However, as technology and state authority continue to expand, courts must persistently uphold the core tenets of Puttaswamy, ensuring that privacy endures not just as a legal ideal but as a lived right for all citizens.

Financial support and sponsorship
Nil.

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

Acknowledgement
I would like to express my sincere gratitude to all those who contributed to the successful completion of this research paper entitled "Contours of the Right to Privacy in India: Constitutional Evolution and Judicial Interpretation."
I am deeply thankful to the authorities and faculty members of Tilak Maharashtra Vidyapeeth's Lokmanya Tilak Law College, Pune, for providing an encouraging academic environment and the necessary support for undertaking this study.

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Manuscript ID:
TIJCMBLIR-2026-030419

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 19 July 2026

Revised: 29 July 2026

Accepted: 16 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.221210041

DOI Link:
https://doi.org/10.5281/zenodo.22121004

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Gender Equality in Political Institutions: A Comparative Global Analysis

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Abstract

Gender equality in political institutions is a core condition of democratic legitimacy, inclusive policymaking, and sustainable development. Despite sustained progress since the 1995 Beijing Declaration and Platform for Action, women remain underrepresented in executive leadership, national legislatures, and many decision-making institutions. This study provides a comparative global analysis of the institutional, political, socio-cultural, and economic factors that shape women's political representation and influence. It employs a qualitative comparative design based on secondary evidence from UN Women, the Inter-Parliamentary Union (IPU), International IDEA, the United Nations, the World Economic Forum, and peer-reviewed scholarship. Feminist Institutionalism serves as the principal theoretical lens, complemented by liberal, radical, socialist, intersectional, Critical Mass, and Critical Actors perspectives. The evidence indicates that proportional representation, well-designed and enforced gender quotas, transparent party recruitment, leadership development, and campaign-finance support are associated with stronger descriptive representation. Yet numerical gains do not automatically produce substantive influence: patriarchal institutional cultures, unequal access to resources, party gatekeeping, political violence, and digital harassment continue to restrict women's decision-making power. In 2026 women hold about 27.5% of national parliamentary seats and 22.4% of cabinet positions globally, while local-government representation is approximately 36%. The study concludes that progress toward Sustainable Development Goal 5 requires institutional reform alongside political-party democratization, socio-cultural transformation, and stronger safeguards against violence and exclusion.

Keywords: *Gender Equality; Political Institutions; Women's Political Representation; Feminist Institutionalism; Gender Quotas; Democratic Governance; Political Leadership; SDG 5*

Introduction

Political equality requires that women and men have equal opportunities to participate in elections, influence public policy, enter political office, and exercise leadership. International commitments - including the Universal Declaration of Human Rights (1948), CEDAW (1979), the Beijing Platform for Action (1995), and Sustainable Development Goal 5 - recognize women's equal political participation as both a human right and a prerequisite for sustainable development. Nevertheless, formal equality has not eliminated structural inequalities in recruitment, campaign resources, leadership advancement, media representation, and access to decision-making. This paper therefore asks not only how many women are represented, but also which institutional arrangements enable women to exercise meaningful political.

Conceptual and Theoretical Framework

Gender equality in political institutions is conceptualized here as equitable access, representation, leadership opportunity, decision-making authority, and policy influence. The framework moves beyond a purely numerical understanding of representation and distinguishes descriptive representation - women's presence in institutions - from substantive representation - their capacity to shape agendas, decisions, and policy outcomes. Feminist Institutionalism provides the central analytical perspective because it explains how formal rules and informal norms interact. Constitutions and electoral laws may guarantee equal rights, but party cultures, patronage networks, informal expectations, and male-dominated leadership structures can continue to shape recruitment and advancement. Liberal feminism highlights legal equality and equal opportunity; radical feminism emphasizes patriarchal power embedded in institutions; socialist feminism connects political exclusion to economic dependence and unpaid care; intersectionality shows how class, caste, ethnicity, religion, disability, age, and location create differentiated political experiences. Critical Mass Theory suggests that a sufficient numerical presence of women can.

How to Cite this Article:
Mohd., I. (2026). Gender Equality in Political Institutions: A Comparative Global Analysis. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 106–110. https://doi.org/10.5281/zenodo.22121004

Dimension	Key Components	Expected Effect
Institutional	Electoral systems, constitutions, parties, gender quotas	Expands or restricts political access
Socio-cultural	Gender norms, patriarchy, education, religion, media	Shapes ambition, legitimacy and leadership
Economic	Economic independence, care burden, campaign finance	Affects capacity to enter and sustain careers
Political	Party ideology, leadership opportunities, political violence	Determines inclusion and decision-making power

alter legislative behaviour, while Critical Actors Theory argues that influential individuals and coalitions may drive substantive change even without reaching a fixed numerical threshold. Together these perspectives help distinguish representation from influence and explain why similar constitutional systems may generate very different gender outcomes.

Literature and Research Gap

Research has increasingly shifted from formal political equality to the quality of democratic inclusion. Phillips (1995) and Mansbridge (1999) established the democratic importance of descriptive representation, while Norris and Lovenduski (1995), Paxton, Kunovich, and Hughes (2007), and later quota scholarship demonstrate the importance of party gatekeeping, electoral systems, candidate supply, and institutional demand. Comparative research generally finds that proportional electoral systems and enforceable quotas improve women's numerical representation, but their effectiveness depends on placement rules, sanctions, party compliance, and wider political commitment. A second strand of scholarship shows that informal institutions can undermine formal reform. Feminist institutionalist research emphasizes organizational cultures, patronage, gendered leadership norms, and informal networks. A third body of work links women's representation to governance outcomes, including stronger attention to education, healthcare, social protection, childcare, and gender equality. Emerging research also identifies violence against women in politics, cyber harassment, misinformation, and algorithmic bias as new constraints. The principal gap addressed here is the need to integrate these institutional, socio-cultural, economic, and digital dimensions within a current comparative global framework.

Research Methodology

The study adopts a qualitative comparative research design using secondary data. It draws on internationally comparable statistics, institutional reports, electoral data, and peer-reviewed literature. Principal sources include UN Women, the Inter-Parliamentary Union, International IDEA, the United Nations, the World Economic Forum, the World Bank, the OECD, and official parliamentary or electoral reports. The analysis focuses on executive government, national legislatures, local government, electoral systems, political parties, gender quotas, leadership opportunities, and violence against women in politics.

Selected comparative reference cases include Rwanda, Sweden, Mexico, Bolivia, New Zealand, the United Kingdom, Germany, India, Bangladesh, and South Africa. These cases represent different electoral systems, quota arrangements, constitutional frameworks, levels of economic development, and socio-cultural contexts. They are used to identify broad patterns rather than to construct detailed country case studies.

Analytical Element	Operational Focus
Dependent variable	Gender equality in political institutions
Primary indicators	Women in cabinets, parliaments, local government and leadership
Institutional variables	Electoral system, quotas, reserved seats, party recruitment
Structural variables	Education, economic resources, labour participation, gender norms
Political variables	Party ideology, leadership access, violence/harassment
Method	Cross-national comparison, thematic analysis, descriptive statistics

Analytical Strategy

The study uses comparative institutional analysis supported by descriptive statistical evidence. Patterns are assessed across political systems to determine which combinations of formal rules and informal conditions are associated with stronger women's representation. The analysis does not claim experimental causality; rather, it identifies recurrent relationships and institutional configurations that are consistent across comparative evidence. This approach is particularly appropriate for examining how gender quotas interact with electoral design, party behaviour, resource inequalities, and political culture.

Scope and Limitations

Because the study relies exclusively on secondary data, its findings depend on the quality and comparability of international datasets. Differences in constitutional systems, electoral rules, definitions, and reporting practices can limit direct cross-national comparison. Informal political practices, grassroots participation, and intra-party negotiations are also difficult to capture through standardized datasets.

Rapid developments in digital politics and artificial intelligence may not yet be fully reflected in international reporting. Nevertheless, the combination of authoritative datasets and established academic literature provides a robust basis for identifying global institutional patterns. No human participants were involved, and the analysis is based on publicly available documents and datasets.

Research Questions

• What is the current status of gender equality across major political institutions and regions?
• Which institutional, political, socio-cultural, and economic factors explain cross-national variation?
• How effective are electoral systems, gender quotas, and party reforms in promoting women's participation?
• To what extent does women's representation contribute to inclusive governance and public policy?
• **Which reforms are most important for accelerating progress toward gender equality by 2030 and beyond?**

Global Status of Women in Political Institutions

Global progress is visible but incomplete. The study reports that in 2026 women occupy approximately 22.4% of cabinet positions and 27.5% of seats in national parliaments. Women's representation in local government is higher, at about 36%, but still below parity. Only a limited number of countries have reached gender parity in cabinets, and women remain underrepresented in influential portfolios such as finance, defence, foreign affairs, and national security. This pattern shows that entry into political institutions does not necessarily produce equal access to executive authority.

Political Institution	Women's Representation	Source Used in Study
Heads of State/Government	28 countries; 30 women leaders	UN Women (2026)
Cabinet Ministers	22.4%	UN Women (2026)
National Parliaments	27.5%	IPU (2026)
Local Government	Approx. 36%	UN Women (2025/2026)

National and Regional Variation

Women's parliamentary representation has risen substantially from approximately 11% in 1995 to 27.5% in 2026. Yet men still hold nearly three-quarters of parliamentary seats worldwide. The paper identifies especially strong performance in countries where quota design, party compliance, and electoral rules reinforce one another. Regional variation is equally significant: Latin America and the Caribbean and Europe/Northern America record comparatively high levels, while Central and Southern Asia and Northern Africa/Western Asia remain lower.

Region	Women MPs (%)
Latin America & Caribbean	37
Europe & Northern America	33
Sub-Saharan Africa	27
Eastern & South-Eastern Asia	24
Oceania	21
Northern Africa & Western Asia	18.5
Central & Southern Asia	17

Local Government and the Leadership Pipeline

Local government has become an important entry point for women's leadership. It can provide experience in constituency work, public administration, budgeting, and community engagement, thereby strengthening pathways to higher office. However, progression is not automatic. Party nomination practices, resource inequalities, family responsibilities, and unequal access to political networks may prevent local-level experience from translating into

Institutional Drivers and Persistent Barriers

Institutional Drivers

Comparative evidence indicates that institutional design matters. Proportional representation can facilitate the nomination and election of more women because parties present multi-member lists rather than relying exclusively on single-member contests. Gender quotas - whether legislated candidate quotas, reserved seats, or voluntary party measures - can rapidly increase descriptive representation when they include clear placement rules, monitoring, and meaningful sanctions for non-compliance. Transparent candidate selection, leadership training, mentoring, and campaign-finance support further reduce barriers to entry.

Institutional Factor	Likely Contribution
Proportional representation	Broader opportunities for women candidates
Legislated gender quotas	Higher descriptive representation
Reserved seats	Guaranteed minimum inclusion
Transparent party recruitment	Fairer nomination and selection
Leadership development	Stronger substantive participation
Campaign-finance support	Reduced economic barriers

Party Gatekeeping and Economic Inequality

Political parties are central gatekeepers because they control nominations, campaign support, access to competitive constituencies, and leadership positions. Male-dominated party hierarchies, patronage networks, and informal recruitment practices can neutralize formal equality. Economic inequality reinforces these constraints: unequal property ownership, labour-market disparities, limited campaign finance, and disproportionate unpaid care work reduce women's capacity to enter and sustain political careers.

Gender Norms, Media, and Political Violence

Gender norms shape political ambition and public perceptions of leadership. Politics is frequently associated with traditionally masculine traits, while women are often judged through expectations related to appearance, family roles, and care responsibilities. Digital communication has widened opportunities for political engagement but also expanded exposure to cyber harassment, hate speech, misinformation, sexualized abuse, and threats. Violence against women in politics - physical, psychological, sexual, economic, or digital - discourages candidacy, weakens political competition, and undermines representative democracy.

Representation and Governance Outcomes

The evidence reviewed in the paper suggests that women's political participation can contribute to more inclusive governance. Prior studies associate women's representation with stronger attention to education, healthcare, childcare, social protection, community development, gender equality, and reforms addressing gender-based violence. Chattopadhyay and Duflo (2004), for example, found distinctive public-goods priorities in women-led local councils in India. Such findings support the proposition that descriptive representation can improve democratic responsiveness, although substantive outcomes depend on institutional authority, party structures, and the ability of women representatives to act as critical actors.

Key Findings and Discussion

Five conclusions emerge from the comparative analysis. First, women's political representation has increased substantially since the Beijing era, but progress remains uneven across executive government, legislatures, local government, regions, and policy portfolios. Second, institutional design is strongly associated with outcomes: proportional representation, enforceable quotas, and inclusive party practices repeatedly appear in higher-representation systems. Third, formal legal equality is insufficient where patriarchal institutional cultures, discriminatory norms, unequal resources, party gatekeeping, political violence, and digital harassment persist. Fourth, numerical representation can strengthen policy responsiveness, but the conversion of presence into influence depends on leadership access, committee roles, party autonomy, and institutional authority. Fifth, the evidence supports Feminist Institutionalism by showing that formal arrangements and informal organizational rules operate together.

Policy Recommendations

- Governments should strengthen gender-quota design through placement requirements, monitoring, transparent implementation, and effective sanctions for non-compliance.
- Political parties should democratize recruitment, publish clear nomination criteria, expand women's access to competitive seats, and institutionalize mentoring and leadership-development programmes.
- Campaign-finance mechanisms should reduce structural economic barriers and support first-time candidates and women from marginalized social groups.
- Electoral authorities and governments should establish credible complaint, enforcement, and digital-safety mechanisms to address violence and online harassment against women in politics.
- Gender-sensitive civic education, responsible media practices, and public-awareness programmes should challenge discriminatory stereotypes about political leadership.
- International organizations and national statistical systems should improve gender-disaggregated political data and monitor progress toward SDG 5 using indicators that capture both representation and substantive influence.

Contribution of the Study

The paper contributes theoretically by integrating Feminist Institutionalism with liberal, radical, socialist, intersectional, Critical Mass, and Critical Actors perspectives. Empirically, it synthesizes recent comparative evidence from international organizations. Methodologically, it uses a multidimensional comparative institutional framework that combines formal rules with socio-cultural, political, economic, and digital factors. Practically, it identifies reforms that can improve both women's access to political institutions and their capacity to exercise substantive influence.

Conclusion

Gender equality in political institutions remains a central democratic challenge. The global record demonstrates meaningful progress, but also persistent inequalities in executive authority, parliamentary representation, party leadership, political resources, and safety. Institutional design - particularly electoral systems, gender quotas, and party recruitment - plays a decisive role in shaping opportunities, yet these formal mechanisms are most effective when accompanied by changes in informal norms and organizational culture. Sustainable gender equality therefore requires a dual strategy: reform the rules that structure political competition and transform the gendered practices that determine who is considered legitimate, electable, and authoritative. Advancing SDG 5 will depend on coordinated action by governments, political parties, electoral institutions, civil society, and international organizations so that women's representation is translated into equal voice, influence, and leadership.

Acknowledgement

I would like to express my sincere gratitude to all those who contributed directly or indirectly to the completion of this research paper titled "Gender Equality in Political Institutions: A Comparative Global Analysis." The study examines women's political representation, institutional barriers, gender quotas, political participation, and the factors influencing substantive political leadership.

Financial support and sponsorship
Nil.

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

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Manuscript ID:
TIJCMBLIR-2026-030420

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 19 July 2026

Revised: 29 July 2026

Accepted: 16 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22121107
DOI Link:
https://doi.org/10.5281/zenodo.22121107

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Factors Influencing Online Purchase Decisions Among Consumers in Pune City

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Abstract
The present study is designed to examine the factors influencing online purchase decisions among consumers in Pune city. An integrated framework is proposed by combining the Technology Acceptance Model (TAM) and the Theory of Planned Behavior (TPB) with contemporary e-commerce constructs. Online trust, perceived risk, website service quality, convenience, AI-enabled personalization, electronic word-of-mouth (eWOM), perceived price/value, social influence, and digital-payment security are positioned as antecedents of online purchase intention, while actual online purchase behaviour is positioned as the outcome. Purchase intention is treated as the principal mediating mechanism. A quantitative, cross-sectional survey design is proposed, with approximately 400–500 adult online shoppers targeted through stratified sampling. Established multi-item measures will be adapted and assessed using a five-point Likert scale. Reliability and validity will be examined through Cronbach's alpha, exploratory factor analysis, and confirmatory factor analysis. Structural equation modelling will subsequently be employed to test direct, mediation, and moderation relationships. The study is expected to contribute by integrating established technology-adoption and consumer-behaviour constructs with AI personalization, eWOM, and digital-payment security in the specific context of Pune. Managerial implications are expected in relation to trust building, risk reduction, website quality, social proof, personalization, and secure digital transactions. Since the research plan specifies future primary-data collection, empirical coefficients and hypothesis decisions have not been fabricated; the results section is structured for completion after actual data collection and analysis.

Keywords*: online purchase decision; consumer behaviour; online trust; eWOM; purchase intention.*

Introduction

The expansion of electronic commerce has transformed consumer purchasing from a predominantly physical activity into an increasingly digital decision process. Consumers are now able to search for products, compare alternatives, examine reviews, receive personalized recommendations, make digital payments, and track deliveries through integrated online platforms. Consequently, online purchase decisions are influenced not only by traditional marketing variables such as price and product attributes but also by technological quality, trust, perceived risk, social influence, and the quality of digital interactions.

The research framework supplied for the present study identifies trust, perceived risk, website quality, convenience, personalization and artificial intelligence (AI), eWOM, price/value, social influence, and digital-payment security as major constructs. Such a multidimensional approach is supported by the established literature on electronic commerce. Trust has been shown to complement technology-acceptance variables in explaining online-shopping intention (Gefen, Karahanna, & Straub, 2003), while perceived risk has been identified as a negative component of electronic-service adoption (Featherman & Pavlou, 2003). Website service quality has also been operationalized through dimensions such as efficiency, fulfilment, system availability, and privacy (Parasuraman, Zeithaml, & Malhotra, 2005). Pune provides a relevant setting for this investigation because a diverse consumer population is exposed to conventional e-commerce, mobile commerce, social commerce, digital payments, and technology-enabled recommendations. Earlier Pune-specific research has examined online-shopping factors, trust, perceived risk, and satisfaction. Rajesh (2018), for example, examined 34 influencing variables among 114 respondents in the Pune area and reported that age did not significantly influence preferences for online-shopping factors. Other Pune-focused research has identified financial, social, time, and security risks as important dimensions of perceived risk.

How to Cite this Article:
Goswami, C., & Dhamore, V. G. (2026). Factors Influencing Online Purchase Decisions Among Consumers in Pune City. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 111–115. https://doi.org/10.5281/zenodo.22121107

The present study extends this body of work by integrating contemporary digital variables within a single explanatory framework.

The study is consequently positioned at the intersection of consumer behaviour, information systems, and digital marketing. TAM is used to explain the technological dimensions of usefulness and ease of use, whereas TPB is used to explain attitudes, social influence, perceived control, intention, and behaviour. Trust, risk, eWOM, price/value, AI personalization, and payment security are incorporated to reflect the characteristics of contemporary online retailing.

Problem Statement and Research Gap

Existing studies have established that online purchasing is affected by multiple determinants; however, these determinants have frequently been examined independently. Trust and risk have commonly been studied as antecedents of transaction intention, website quality has been examined through electronic service-quality models, and social influence has been examined through technology-adoption theories. More recent developments, particularly AI-enabled recommendations, social commerce, and integrated digital payments, have not always been incorporated into location-specific consumer models.

At the local level, earlier Pune studies provide valuable evidence concerning online-shopping motivation, trust, perceived risk, and satisfaction, but the digital environment has evolved substantially. A contemporary Pune-specific framework is therefore required in which traditional determinants and emerging technology-related factors are considered simultaneously. The present study addresses this gap by proposing an integrated model of online purchase intention and actual purchase behaviour.

Literature Review

Technology Acceptance Model

Davis (1989) proposed that perceived usefulness and perceived ease of use are fundamental determinants of technology acceptance. In online shopping, usefulness may be represented by efficient search, comparison, personalization, and transaction completion, whereas ease of use may be represented by simple navigation, clear interfaces, and convenient purchasing procedures. TAM2 subsequently demonstrated that social influence and additional cognitive factors can contribute to technology acceptance (Venkatesh & Davis, 2000).

Theory of Planned Behavior

Ajzen's (1991) Theory of Planned Behavior proposes that behavioural intention is influenced by attitude, subjective norm, and perceived behavioural control. In online shopping, favourable attitudes can be generated by convenience and perceived value; subjective norms can be represented by peers, reviews, and influencers; and perceived control can be associated with digital competence and confidence in completing transactions. TPB therefore provides a behavioural complement to TAM.

Trust and Perceived Risk

Trust is particularly important in electronic commerce because transactions occur without direct interpersonal interaction and involve uncertainty concerning seller behaviour, information security, product fulfilment, and payment. Gefen et al. (2003) established the importance of trust alongside TAM constructs. Pavlou (2003) integrated trust and perceived risk into an e-commerce acceptance model and reported empirical support for the integrated framework. Featherman and Pavlou (2003) further demonstrated that perceived risk can adversely affect electronic-service adoption. A positive effect of trust and a negative effect of risk are therefore proposed.

Website Service Quality

Parasuraman et al. (2005) developed E-S-QUAL as a multi-item measure of electronic service quality, incorporating efficiency, fulfilment, system availability, and privacy. These dimensions are directly relevant to online shopping because consumers evaluate the quality of the digital service through which a purchase is made. High service quality is therefore expected to strengthen confidence and purchase intention.

Convenience and Perceived Value

Convenience represents the time, effort, and flexibility benefits associated with online shopping. Perceived value represents the overall evaluation of benefits relative to monetary and non-monetary costs. Both constructs are expected to encourage online purchase intention, particularly where consumers perceive online purchasing as more efficient and economically beneficial than available alternatives.

WOM and Social Influence

Online reviews, ratings, and consumer-generated opinions provide social information that can reduce information asymmetry. Cheung, Lee, and Rabjohn (2008) demonstrated the importance of factors influencing the adoption of online opinions. Social-media influencers constitute another form of social influence. Lou and Yuan (2019) found that informative value and source credibility contribute to trust in influencer-generated branded content and subsequently influence purchase-related outcomes. eWOM and social influence are therefore expected to contribute positively to purchase intention.

Conceptual Framework

The proposed framework consists of nine principal independent variables—online trust, perceived risk, website service quality, convenience, AI personalization, eWOM, perceived price/value, social influence, and digital-payment security. These variables are hypothesized to influence online purchase intention. Purchase intention is then hypothesized to influence actual online purchase behaviour. Trust is additionally positioned as a possible mediator between AI personalization and purchase intention, while age and digital experience are considered potential moderators.

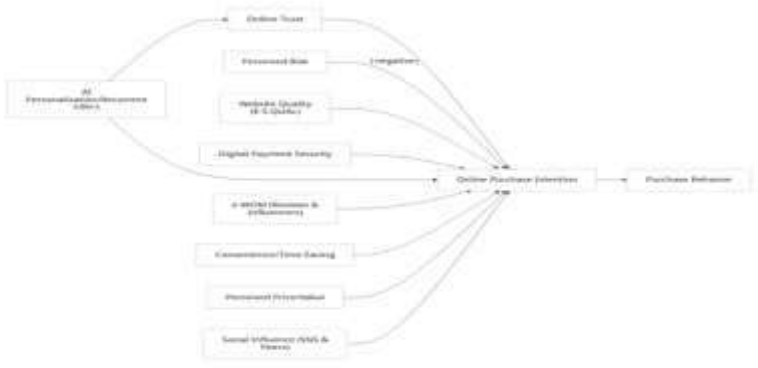


Figure 1: Conceptual model of online purchase decision factors (IVs → Purchase Intention → Behavior).

Research Objectives

1. To identify the major determinants of online purchase decisions among consumers in Pune city.
2. To examine the effect of purchase intention on actual online purchase behaviour.
3. To examine the mediating role of purchase intention and the proposed trust mechanism.

6. Hypotheses

Hypothesis	Statement
H1	Online trust has a significant positive effect on online purchase intention.
H2	Perceived risk has a significant negative effect on online purchase intention.
H3	Convenience has a significant positive effect on online purchase intention.
H4	eWOM has a significant positive effect on online purchase intention.
H5	Social influence has a significant positive effect on online purchase intention.
H6	Online purchase intention has a significant positive effect on actual online purchase behaviour.
H7	Online trust mediates the relationship between AI personalization and purchase intention.

Research Methodology

Research Design

A quantitative, descriptive-cum-explanatory, cross-sectional design is proposed. Primary data will be collected using a structured questionnaire. The individual consumer will constitute the unit of analysis.

Population and Sample

The population will comprise Pune city residents aged 18 years or above who have made at least one online purchase. Approximately 400–500 usable responses will be targeted. A sample near 384 is consistent with the conventional Cochran calculation for a large population at 95% confidence, 5% margin of error, and maximum variability. Additional responses will be sought to compensate for incomplete cases and to support multivariate analysis.

Sampling Strategy

Stratified sampling will be used to improve representation across age, gender, income, education, occupation, geographic zone, and digital experience. Online and offline collection modes may be combined. Quotas will be monitored so that the sample is not dominated by students or technology professionals.

Measurement Instrument

Validated multi-item scales will be adapted from established literature. A five-point Likert scale from 1 = Strongly Disagree to 5 = Strongly Agree is recommended. Expert review will be used for content validity and approximately 30 respondents will be included in a pilot test. Where required, English items will be translated into Marathi/Hindi and back-translated

Construct	Operationalization	Main source
Online Trust	Reliability, honesty, security and dependability	Gefen et al. (2003)
Perceived Risk	Financial, privacy, performance and security uncertainty	Featherman & Pavlou (2003)
Website Quality	Efficiency, fulfilment, system availability, privacy	Parasuraman et al. (2005)
Convenience	Time saving, flexibility and reduced effort	Adapted online-shopping scales
AI Personalization	Relevance and usefulness of recommendations	Recommender-system literature
eWOM	Reviews, ratings and online opinions	Cheung et al. (2008)
Social Influence	Peers, social norms and influencers	Venkatesh & Davis (2000); Lou & Yuan (2019)
Price/Value	Value for money, price fairness and offers	Sweeney & Soutar (2001)
Payment Security	Security and reliability of digital payment	E-commerce security literature
Purchase Intention	Likelihood and plan to purchase online	Pavlou (2003)
Purchase Behaviour	Recent frequency/extent of online purchases	Survey-based measure

Data Collection and Analysis

- **Target Population:** Pune city residents (age ≥18) who have shopped online at least once. Pune is urban, young (62% under 30), educated (literacy ~86%), and tech-enabled. We will include both IT/college hubs and other areas of Pune.
- **Sample Size:** For SEM, we aim for n≈400–500. Using Cochran's formula with 50% prevalence, 95% confidence, 5% margin gives ~384; we will oversample ~10–20% to account for incomplete surveys. A larger sample (500) ensures stable EFA/CFA results and allows splitting for validation.
- **Sampling Method: Stratified random sampling** by region/ward and demographic quotas. We will obtain ward-level lists to ensure representation across.
- **Age groups** (e.g. 18–24, 25–34, 35–44, 45–60, 60+). Recall Pune is skewed young, but we will ensure older groups are included.
- **Gender:** Aim roughly 50:50 (though Pune has ~948 women per 1000 men).
- **Income/Education:** We will include students, professionals, homemakers; quotas could follow city census or known demographics
- **Internet Experience:** Include varying tech-savviness (e.g. frequent vs new online shoppers). Possibly screen by whether they've shopped in last year.
- **Inclusion:** Age ≥18, resides in Pune city limits, has internet access and has made at least one online purchase.
- **Exclusion:** Non-residents, underage, exclusively offline shoppers.
- **Stratification:** Wards can be grouped (east/west/north/south Pune) or by administrative zones. Within each stratum, random or systematic selection of respondents (using contact lists or intercept at malls/college campuses).

Results and Discussion

The study also distinguishes statistically significant relationships from practically important relationships. A significant coefficient should not automatically be described as a strong managerial effect. Effect size, confidence interval, explanatory power, and theoretical consistency should be considered together. Demographic differences should be interpreted cautiously and should not be treated as causal explanations in a cross-sectional design.

The study is to extend conventional online-shopping models by combining TAM and TPB with trust, perceived risk, eWOM, AI personalization, and digital-payment security. TAM contributes the technological perspective; TPB contributes the behavioural-intention mechanism; trust and risk capture transaction uncertainty; eWOM and social influence capture social information; and AI personalization and payment security represent contemporary digital-commerce characteristics. The Pune-specific application is expected to provide evidence regarding which of these constructs remain relevant when considered simultaneously.

Future Research

Longitudinal studies could examine changes in trust and purchase behaviour over time. Experimental studies could isolate the effects of AI recommendations, recommendation transparency, influencer credibility, and payment-security cues. Comparative research could be conducted across Pune and other Indian cities. Qualitative studies could identify motivations not captured by standardized scales. Finally, anonymized transaction or clickstream data could be integrated with survey responses to improve behavioural validity.

Conclusion

An integrated framework has been developed for examining online purchase decisions among consumers in Pune city. The framework recognizes that online purchasing is shaped by a combination of trust, risk, convenience, service quality, price/value, social information, AI personalization, and digital-payment security. Purchase intention is positioned as the central behavioural mechanism through which these antecedents are expected to influence actual purchasing behaviour. The proposed methodology provides a systematic basis for empirical validation through stratified sampling and multivariate analysis. The final journal manuscript should incorporate the actual statistical evidence obtained from the completed survey and should avoid reporting anticipated findings as observed results.

Acknowledgment

The author expresses sincere gratitude to all those who contributed directly or indirectly to the successful completion of the research paper entitled "Role of AI in Transforming Human Resource Management." The author is deeply thankful to the Department of Commerce, Mudhoji College, Phaltan, District Satara, Maharashtra, for providing the academic environment, institutional support, and encouragement necessary for undertaking this study.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030421

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 19 July 2026

Revised: 29 July 2026

Accepted: 16 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22121181
DOI Link:
https://doi.org/10.5281/zenodo.22121181

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Custodial Violence – A Blemish on The Judicial System of Largest Democracy of the World

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Abstract
As lack of separate legislation in India, we have to depend on scattered provisions. The National Human Rights Commission (NHRC) took suo motu cognizance in 17 cases of alleged human rights violations reported by media during May, 2018 and issued notices to the concerned authorities for reports. Incitement of criminal offenses, court contempt, honor and harm, decency, morality, public order, national security, and India's sovereignty and integrity are among the grounds on which Article 19(2) permits restrictions. These restrictions, which aim to balance individual freedom with collective well-being, underscore the difficulty of media regulation. By recognizing the potential for abuse and considering the press as a safeguard for democracy, the authors of the Constitution have discovered a system that seeks to improve the balance. the media as aims to improve balance, recognizes the possibility of abuse, and serves as a safeguard for democracy. The extensive spectrum of Police brutality that occurred during the 1975–1977 emergency was noted by the Shah Commission (1978). Due to their lack of accountability to any public authority, the Commission brought the government's attention to the actions of the police during the emergency. The National Police Commission (1979–81), among other reports, carried out a comprehensive examination of the issues pertaining to police operations. conducted a thorough analysis of the problems surrounding police operations. The Commission noted in its initial report the reasons behind administrative torture in India.

Keywords: *Custodial violence, Freedom of speech and expression, National Human Rights Commission (NHRC), Rights of prisoners, Separate Legislation.*

Introduction

If we turn the pages of the history of India, we find that India is a land of diversity. India is diversified because of the invasion of various rulers and India itself has the various history of the several customs and traditions that are followed from generation to generation. Every state has its own cultural history which can be classified into – linguistic, way of dressing, way of worshipping the customs and traditions of marriages to be followed. In-short we can say that India has a very great and diversified history in all sense. It's been said and believed by various Philosophers that Indians are very tolerant in nature so it's easy for invaders to invade and rule for a longer time, and if we turn the pages of our history, we find that this belief of many had proven true. It was found in some cases that the Invaders and Rulers of India had forced the Indian people to follow their customs or traditions compelledly. To rule the people and for the smooth running of the administration of the kingdom the rules and the laws are required. Every ruler has its own rules and laws to run the administration and maintain the justice amongst the people. It's being said that in - order to avoid injustice and smooth running of the administration the country, state, kingdom needed to have its own judicial system. India before Independence or before being a democratic nation several punishments are prescribed by the Dharma Shastra, including dipping the hands and feet in boiling oil, cutting the hands, and putting molten lead in the ears.

In ancient India, the police force was one of the most important administrative institutions since it was the responsibility of the state to uphold law and order, protect its citizens by discouraging criminal activity, and prevent evildoers from committing crimes as stated by Yajnavalkya. Yajnavalkya's detection of crimes and arrest of the suspicious, protection of the civil population, and prevention of illegal acts were the basic functions of the police. Indian police have been using violent tactics since the Vedic period of Indian history, so this is not a new development. Indian police have been using violent tactics since the Vedic era of Indian history, so it is not a new phenomenon. It originates from the Vedic period of Indian history. Although the practice of brutal measures by Indian police during the Vedic period dates to the earliest Vedic period of Indian history, it is not a recent development.

How to Cite this Article:
Patidar, P., & Dongare, M. (2026). Custodial Violence – A Blemish on The Judicial System of Largest Democracy of the World. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 116–119. https://doi.org/10.5281/zenodo.22121181

The practice of brutal measures by Indian police is not a new phenomenon, albeit it can be traced to the earliest Vedic period of Indian history. At that time, it was popular to experience things like fire, water, poison, rice grains, fountains, cheese, etc. At that time, it was popular to experience things like fire, water, poison, rice grains, fountains, cheese, etc., during during that time. The Manu Smriti, Yagnakaya, Brihaspati, Narada, Kautilya, and Gautama Smritis all make mention of torture and harsh punishment. punishment in the Manusmriti, Gautama Smriti, Yajnavalkya, Brihaspati, Narada, and Kautilya texts. Yajnavalkya, Brihaspati, Narada, Kautilya, Gautama Smritis, and Manusmriti., Yajnavalkya, Brihaspati, Narada, Kautilya and Gautama Smritis. Dandin makes mention of death by torture. The jailor Kantaka on one occasion asked a thief to restore his stealing's to the citizens, failing which he would suffer the eighteen tortures one after another till death. In the Junagadh copper plate inscription, there is a mention of over-torture. Limb mutilation seems to be the most prevalent practice. appears to be the most common practice. Manu and Narada stated that eight choices could be made for infliction. The tongue, the two hands, the two feet, the eyes, the nose, and the two ears are among them. the two ears and the nose. injury, including the tongue, the abdomen, the two hands, the two feet, the eyes, the nose, and the two ears, as well as the privy parts. the tongue, the two hands, the two feet, the eyes, the nose, and the two ears the inhumane practice of thrusting a red-hot iron into a criminal's mouth and pouring hot oil into their ears and throat was mentioned by Narada. to the cruel custom of forcing a red-hot iron into a criminal's mouth and slathering hot oil into their ears and throat. the throat, ears, and mouth of a criminal who has been given a death sentence. striking a criminal who has been given a death sentence with a red-hot iron in the mouth, as well as the throat and ears. putting a fiery iron in a criminal's mouth and sticking it in his ears. -hot iron into the mouth of a criminal who has been given a death sentence. In his Arthasastra, Kautilya noted that the punishment must be determined by taking into account the offender's strength, age, conduct, earning capacity, financial situation, torment, and the type of offense committed. Arthasastra observed that awarding of punishment must be regulated by consideration of the torture and nature of the offence, time and place, strength, age, conduct, earning and monetary position of the offender. He suggested using eighteen different forms of torture to get the accused to divulge information. of torture to elicit information from the accused. "Those whose guilt is determined to be probable will be tortured." whose guilt is found to be probable shall be subjected to torture. Torture can be inflicted collectively, individually, or repeatedly in the case of a former criminal who retracts after confessing, with whom some of the stolen goods are discovered, who is arrested for the act or the article, who tries to take the ruler's treasury, or who is to be tortured to death at the ruler's command. retracts, with whom a part of the stolen goods is found, who is arrested because of the act or with the article, who attempts to seize the ruler's treasury or who is to be killed by torture at the ruler's order. The British discovered that torture by officials, including Kotwals, was common during their early years of rule, eventually leading to deaths. After considering the frequent use of torture, the Select Committee on East Indian Affairs (1832) concluded that "there is ample evidence that colonial administration was aware of excessive pain by revenue and police officials used purposely to extort confessions, money, or taxes" (Rao 2004). The British government established the Torture Commission in 1855 to investigate claims of torture during the Madras Presidency in Its report made clear how common police torture was during the Madras Presidency. "Torture" is defined by the Torture Commission as "pain used to punish guilt or coerce a confession." Instead of focusing on isolated, exceptional cases, the report highlighted the systemic issue of torture in policing. The torture commission's recommendation served as the cornerstone for the creation of the Police Commission in 1860. To examine the performance and operational procedures of the State Police in the 1950s, 1960s, early 1970s, and 1980s, the Union and State Governments appointed a few Police Commissions after independence.

The extensive spectrum of Police brutality that occurred during the 1975–1977 emergency was noted by the Shah Commission (1978). Due to their lack of accountability to any public authority, the Commission brought the government's attention to the actions of the police during the emergency. The National Police Commission (1979–81), among other reports, carried out a comprehensive examination of the issues pertaining to police operations. conducted a thorough analysis of the problems surrounding police operations. The Commission noted in its initial report the reasons behind administrative torture in India. Nirabati Behera against Odisha, 1993: The Supreme Court finds that the victim is breached while in custody. He was liable for compensation to the state and awarded Rs. 1.55,000. D.K. BASU against West Bengal in 1997: The Supreme Court recognized police violence and atrocities as an attack on human dignity. The court determined 11 guidelines to be observed during the arrest and provided to those arrested. Nine policemen in India were recently punished for custodial torture in two major cases: the 2020 Sattankulam father-son deaths in Tamil Nadu (where all nine officers received the death penalty in April 2026), and the 2011 Washim case in Maharashtra (where nine policemen were sentenced to life imprisonment in July 2026). These verdicts are rare but significant, showing growing judicial intolerance toward custodial violence. Victims: P. Jayaraj (58) and his son J. Benicks (31). Incident: Arrested in June 2020 for allegedly violating COVID-19 lockdown norms by keeping their shop open. Abuse: Brutally tortured overnight at Sattankulam police station. Outcome: Both died in custody (Benicks on June 22, Jayaraj on June 23). Verdict: On April 6, 2026, the Madurai court sentenced nine policemen to death, calling it a “rarest of rare” case. Convicted Officers: Inspector S. Sridhar, Sub-Inspectors P. Raghu Ganesh & K. Balakrishnan, Head Constables S. Murugan & A.

Saamidurai, Constables M. Muthuraj, S. Chelladurai, X. Thomas Francis, and
S. Veilumuthu.Significance: First time such a large group of policemen received the death penalty for custodial torture.
Washim Custodial Death (Maharashtra, 2011) Victim: Begya Pawar, a 23-year-old from the Pardhi community. Incident: Picked up by Risod police in May 2011, allegedly beaten inside the station. Outcome: Died in custody with multiple fractures. Verdict: On July 3, 2026, Washim District Court sentenced nine policemen to life imprisonment after a 15-year trial. Convicted Officers: Included then Station House Officer Mahadev Manik Dhande and eight others. Significance: A landmark ruling for marginalized communities, showing persistence of families in fighting long legal battles One of the main reasons may be because of the lack of legal awareness in the country. Police officers aren't scared to be stuck in action because of flaws in the system. Thus, you can proceed to extract information in violent ways and your rights will be sacrificed if they are not legally recognized. Police trust the victims to continue using violent methods to deal with them because they do not recognize their rights. Another reason is improper training. Officers are not adequately prepared to handle.

It's been said by the Martin Luther King, Jr. – "-Injustice anywhere is a threat to justice everywhere. We are caught in an inescapable network of mutuality, tied in a single garment of destiny. Whatever affects one directly, affects all indirectly."[1] If talking about the modern era we found that use of abuse of powers is increasing day by day in India. India being the Democratic country following adversarial justice system is the signatory of UNCAT but the ractification of convention has not taken place though decade passed. Prevention of Anti Torture Bill,2010 was introduced in Lok Sabha on 26/04/2010 and was passed by Lok Sabha on 06/05/2010. But still, there is no separate legislation Regarding custodial violence formed in India. Though there are lots of scattered legal provisions in various laws for anti-torture activities for custodials but still the cases of custodial violence are increasing day-by-day. So, there is a need of Separate Legislation. Human rights and significant demographic realities of society are not well understood by Indian police personnel. Actually, 12 percent of police officers have never received training on human rights and contemporary ideas of judicial justice that are effective in India. Employees can therefore determine which behavioral change measures are required and reorganize them for early-stage sensitivity training using an independent mechanism. No state has complied with the Supreme Court's guidelines for the establishment of police complaints under Prakash Singh v. Union of India (2006). Police overload can be caused by a variety of factors, including political pressure, low pay, long police hours, and physical and mental stress. This is only feasible if the government implements the curative police reforms that the Indian Constitution promises to protect the lives, security, and dignity of all citizens at all levels though they may be in prison. The Bill should be passed and separate legislation is required for the Custodial Torture. Only Media can pen by rising voice in the words of prisoners. The cases of custodial torture which were focused till now was due to only and only 'media' and hence the role of Media is important. This chapter speaks about that there should be separate legislation for Custodial Torture and the voice of the inmates should be made vocal by media. Custodial violence persists because laws exist but enforcement is weak. Real change requires political will, independent oversight, and a shift in police culture from coercion to service. Without accountability, even strong laws remain ineffective.

Legal & Judicial Framework

- **Strict Enforcement of D.K. Basu Guidelines (1997)**: Arrest memos, medical checks, and informing relatives must be made non-negotiable.
- **Mandatory CCTV & Audio-Video Recording**: Every police station and interrogation room should have functioning surveillance, with footage stored securely.
- **Fast-Track Custodial Violence Courts**: Special courts to handle custodial death/torture cases within 6–12 months.
- **Independent Complaints Authorities**: As recommended in *Prakash Singh v. Union of India (2006)*, to investigate police misconduct without political interference

Conclusion

This article will aid in understanding the issues surrounding prisoners' rights. Equal opportunities and rights should be granted to prisoners in accordance with human rights. Prisoners' human rights must be upheld and supported. Custodial torture in India is a critical issue that has been addressed through various judicial pronouncements and legal frameworks. Prisoners have the right to care, protection, development, and rehabilitation. As a result, every prisoner is accorded human rights and treatment under the Indian Constitution. Despite these legal safeguards, custodial torture remains a systemic issue, with calls for stronger anti-torture laws and better implementation of existing provisions.

Acknowledgment

The author expresses sincere gratitude to all those who contributed directly or indirectly to the successful completion of the research paper entitled Constitutional Federalism in India: Recalibrating Union–State Relations Through Collaborative Governance."

Financial support and sponsorship

Nil.

Conflicts of interest

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

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10. Constitution of India, 1950. Relevant provisions include Articles 14, 19, 20, 21, 22, 32 and 226.
11. *Note: References were added to support the authorities, reports, legislation and international instrument already discussed in the article. The existing substantive text has otherwise been retained.*

Manuscript ID:
TIJCMBLIR-2026-030422

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 19 July 2026

Revised: 29 July 2026

Accepted: 16 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22121225

DOI Link:
https://doi.org/10.5281/zenodo.22121225

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Federalism And Cooperative Governance in India: Constitutional Challenges and Opportunities

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Abstract
Federalism is an important feature of the Indian Constitution. It establishes a constitutional division of powers between the Union and the States while also creating mechanisms for cooperation between them. Unlike classical federations, the Indian Constitution provides a strong Union Government to maintain national unity, security and economic stability. At the same time, States have substantial constitutional responsibilities in areas such as public order, public health, agriculture and local administration. In recent years, the relationship between the Union and the States has become increasingly important because many national challenges require coordinated action. Issues such as public health, environmental protection, economic development, taxation, disaster management, digital governance and internal security cannot always be addressed effectively by one level of government alone. The concept of cooperative federalism therefore assumes considerable significance. This paper examines the constitutional framework of Indian federalism and analyses the opportunities and challenges associated with cooperative governance. It discusses the distribution of legislative, administrative and financial powers, the role of institutions such as the Inter-State Council, Finance Commission and GST Council, and the contribution of the Supreme Court in protecting the federal character of the Constitution. The paper argues that Indian federalism should not be understood merely as a division of powers but as a continuing constitutional partnership between different levels of government. Strengthening consultation, fiscal autonomy, institutional dialogue and constitutional conventions can make cooperative federalism more effective.

Keywords: *Federalism, Cooperative Federalism, Constitution of India, Union-State Relations, Governance, Fiscal Federalism, GST Council, Inter-State Council.*

Introduction

India is one of the largest and most diverse democratic countries in the world. It has different languages, cultures, geographical conditions, economic structures and social needs. Managing such diversity requires a system of governance in which power is distributed between different levels of government. The Constitution of India establishes a federal system with a relatively strong Union. Article 1 describes India as a "Union of States." The Constitution distributes legislative powers between the Union and the States through the Union List, State List and Concurrent List under the Seventh Schedule. However, Indian federalism is different from the traditional federal model found in countries such as the United States. The Indian Constitution provides several provisions that strengthen the Union Government, particularly during emergencies and in matters involving national interest. At the same time, the Constitution recognises the importance of State Governments and provides them with constitutionally protected areas of responsibility. The success of Indian federalism therefore depends not merely upon separation of powers but also upon cooperation, coordination and consultation**.** The idea of cooperative federalism has become increasingly important in contemporary governance. Governments must work together to address issues such as poverty, climate change, health emergencies, infrastructure, education, taxation, unemployment and sustainable development. The COVID-19 pandemic, for example, demonstrated that effective governance requires coordination between the Union, States and local authorities. Similarly, implementation of the Goods and Services Tax (GST) has created a new institutional framework for cooperation between the Union and States.

Meaning and Concept of Federalism

Federalism is a system of government in which constitutional powers are divided between two or more levels of government. Generally, the Constitution specifies the areas in which each level of government can exercise authority

How to Cite this Article:
Yadav, S. D. (2026). Federalism And Cooperative Governance in India: Constitutional Challenges and Opportunities. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 120–123. https://doi.org/10.5281/zenodo.22121225

According to K.C. Wheare, federal government involves a constitutional division of powers between coordinate authorities.

However, Indian federalism cannot be completely explained through the classical theory of federalism.

The Supreme Court has repeatedly recognised the federal character of the Indian Constitution. In S.R. Bommai v. Union of India**,** the Court treated federalism as an important feature of the constitutional structure.

Indian federalism can therefore be described as a combination of:

- Federal features;
- Unitary features;
- Constitutional supremacy;
- Distribution of powers;
- Judicial review; and
- Institutional cooperation.

Constitutional Framework of Indian Federalism

The Constitution provides a comprehensive framework for Union-State relations.

Legislative Relations

Articles **245–255** deal primarily with legislative relations between the Union and States.

The Seventh Schedule contains three lists:

Union List: Parliament has exclusive power to legislate on subjects such as defence, foreign affairs, currency and atomic energy.

State List: States ordinarily have legislative authority over subjects such as public order, police, public health and agriculture.

Concurrent List: Both Parliament and State Legislatures can make laws on subjects such as education, forests, marriage and criminal law.

Article 246 establishes the general distribution of legislative powers. This arrangement provides both autonomy and coordination.

Administrative Relations

Articles **256–263** deal with various aspects of administrative relations.

Article 256 requires States to exercise their executive power in a manner that ensures compliance with laws made by Parliament. Article 263 provides for the establishment of an **Inter-State Council** when the President considers it necessary in the public interest. The Inter-State Council can provide an important platform for dialogue between the Union and States.

Financial Relations

Financial resources are another important dimension of federalism.

The Constitution provides for the distribution of taxation powers and financial resources between the Union and States. The **Finance Commission**, established under Article 280, recommends the distribution of certain tax revenues between the Union and States and principles relating to grants-in-aid. Financial federalism is particularly important because States have substantial responsibilities relating to public services, while the Union has access to major sources of revenue.

From Competitive Federalism to Cooperative Federalism

The concept of federalism has evolved considerably. Competitive federalism encourages States to compete with each other in areas such as investment, infrastructure, economic growth and administrative performance. Cooperative federalism**,** on the other hand, emphasises collaboration between the Union and States. Both approaches can exist simultaneously.

For example, States may compete to attract investment while cooperating with the Union on national infrastructure, taxation and environmental policies. The objective should therefore not be to eliminate competition but to ensure that competition does not undermine constitutional cooperation.

Constitutional and Institutional Mechanisms of Cooperative Federalism

Several constitutional and institutional mechanisms facilitate cooperation.

Inter-State Council

The Inter-State Council provides a forum for discussion of matters affecting relations between the Union and States. It can help resolve disagreements through dialogue rather than confrontation. A stronger and more regular Inter-State Council could contribute significantly to cooperative governance.

Finance Commission

The Finance Commission plays an important role in maintaining financial balance between the Union and States. The principle of **fiscal federalism** requires that financial resources should be distributed in a manner that enables different governments to perform their constitutional responsibilities effectively.

Goods and Services Tax Council

The GST Council represents one of the most significant examples of institutionalised cooperative federalism. Article 279A provides the constitutional basis for the GST Council. The Council includes representatives of the Union and States and provides a common platform for decisions relating to GST.

The Supreme Court's judgment in Union of India v. Mohit Minerals Pvt. Ltd**.** clarified important aspects of the constitutional position of the GST Council and emphasised that its recommendations are not automatically binding in the manner of legislation. The GST framework demonstrates that complex national economic policies can require institutional cooperation.

Role of the Supreme Court in Protecting Federalism

The Indian judiciary has played an important role in defining the federal structure.

State of West Bengal v. Union of India

The Supreme Court played an important role in explaining and protecting the federal nature of the Indian Constitution. The case arose when the Central Government wanted to acquire certain coal-bearing lands belonging to the State of West Bengal. The State argued that the Union Government could not acquire its property without its consent because India has a federal system in which the powers of the Centre and States are separately divided. The Supreme Court examined the relationship between the Union and the States and held that India is a Union of States and the States do not have completely independent

sovereignty. The Court also stated that the Constitution gives important powers to both the Centre and the States.

The judgment helped to clarify the balance of power between the Union and the States. Although the Court recognized that the Union is stronger than the States in certain matters, it also emphasized that the powers of both levels of government come from the Constitution. Therefore, the Union cannot simply act outside the powers given to it by the Constitution. In this way, the Supreme Court acts as an independent authority to settle disputes between the Centre and the States and ensures that constitutional limits are respected. Thus, *State of West Bengal v. Union of India* is an important case for understanding how the Supreme Court protects the federal structure of India.

S.R. Bommai v. Union of India

In S.R. Bommai v. Union of India (1994), the Supreme Court played an important role in protecting the federal structure of India. The case mainly concerned the misuse of Article 356, under which the President can impose President's Rule in a State. The Supreme Court held that the power under Article 356 cannot be used arbitrarily to remove a state government. The Court stated that the majority of a government should normally be tested on the floor of the Legislative Assembly, rather than being decided only by the Governor or the Central Government.

The judgment strengthened State autonomy and federalism by placing limits on the Centre's power over State governments. The Supreme Court also held that the President's decision under Article 356 is subject to judicial review. If the Centre uses this power improperly, the Court can examine the decision and provide a remedy. Thus, the *S.R. Bommai* case is considered a landmark judgment because it prevented the misuse of Central power and helped maintain a proper balance between the Union and the States.

State of Rajasthan v. Union of India

In State of Rajasthan v. Union of India (1977), the Supreme Court examined the relationship between the Central Government and State Governments. The case arose when the Central Government asked several State governments to dissolve their Legislative Assemblies. The States argued that the Centre was interfering with their constitutional powers. The Supreme Court considered whether the actions of the President and the Union Government could be challenged in court. The case helped clarify that the Centre and States must exercise their powers according to the Constitution.

The Supreme Court also emphasized that India has a federal structure, although the Union has stronger powers in certain situations. The Court stated that the Union cannot interfere with the States without constitutional authority. At the same time, the Court gave considerable freedom to the Union in matters involving political questions. Thus, the case is important because it explained the constitutional relationship between the Centre and the States and highlighted the role of the Supreme Court in maintaining the balance of federal powers.

Union of India v. Mohit Minerals Pvt. Ltd.

The Supreme Court considered the constitutional status of GST Council recommendations and the relationship between Union and State legislative powers in the GST framework.

These judgments demonstrate that the judiciary acts as an important constitutional institution in maintaining the balance between different levels of government.

Major Challenges to Cooperative Federalism

Despite constitutional safeguards, Indian federalism faces several challenges.

Fiscal Dependence of States

States require substantial financial resources to fulfil their constitutional and developmental responsibilities. Excessive financial dependence can affect the effective autonomy of States. Therefore, fiscal federalism should provide States with adequate and predictable resources.

Political Differences

Political differences between the Union and State Governments can sometimes create difficulties in policy implementation. Cooperative federalism requires institutions to function beyond short-term political interests.

Use of Central Powers

Certain constitutional provisions provide significant powers to the Union. While these powers are necessary in particular circumstances, their excessive or politically motivated use can create tensions in Centre-State relations.

Role of Governors

The office of the Governor has occasionally become a source of controversy in Centre-State relations. Issues relating to government formation, assent to Bills and communication between Raj Bhavan and elected State Governments demonstrate the need for constitutional conventions and institutional restraint.

Concurrent List and Legislative Overlap

The Concurrent List allows both Parliament and State Legislatures to legislate. Although this promotes uniformity where necessary, disagreements may arise when Union and State laws overlap. Article 254 provides a constitutional mechanism for dealing with inconsistency between Parliamentary and State legislation in the Concurrent field.

Regional Inequalities

States differ considerably in their economic capacity, infrastructure and human-development indicators. Cooperative federalism must therefore recognise regional diversity rather than adopt a completely uniform approach.

Findings of the Study

The study makes the following observations:

1. Indian federalism is constitutionally structured but flexible.
2. The Constitution gives the Union significant powers while protecting important areas of State autonomy.
3. Cooperative federalism is essential for effective implementation of national policies.
4. Fiscal relations are central to the success of federal governance.
5. Political differences can weaken cooperation between the Union and States.

6. Institutions such as the Finance Commission and GST Council provide important platforms for federal cooperation.
7. Judicial decisions have played an important role in protecting constitutional federalism.
8. Local governments should receive greater attention in discussions on federal governance.
9. Regular consultation between the Union and States can reduce constitutional and political conflicts.
10. Indian federalism should be understood as a dynamic partnership rather than merely a constitutional division of powers.

Suggestions

The following measures may strengthen cooperative governance in India:

First, the Inter-State Council should be strengthened and meetings should be held at regular intervals.

Second, consultation with State Governments should be institutionalised before major policies affecting State subjects are introduced.

Third, financial relations between the Union and States should remain transparent, predictable and consistent with constitutional principles.

Fourth, constitutional authorities should exercise their powers with restraint and respect democratic mandates.

Fifth, the role of Governors should be guided by constitutional conventions and impartiality.

Sixth, the GST Council should continue to encourage consensus-based decision-making.

Seventh, local governments should be given adequate financial and administrative capacity.

Eighth, cooperative federalism should be supported by data sharing, technology and evidence-based policy-making.

Conclusion

Federalism is one of the fundamental principles of India's constitutional governance. However, Indian federalism cannot be understood simply as a separation of governmental powers. The Constitution creates a system in which the Union and States are expected to function within their respective constitutional spheres while cooperating on matters of common national importance.

The changing nature of governance has made cooperative federalism more important than ever. Climate change, public health, economic development, digital transformation, disaster management and national infrastructure require governments to work together. At the same time, cooperation does not mean the complete surrender of State autonomy. A healthy federal system requires both national coordination and State autonomy.

The future of Indian federalism therefore depends on a balance between unity and diversity, national priorities and regional interests, coordination and autonomy, and constitutional authority and democratic accountability. Cooperative federalism should consequently be viewed not merely as a political slogan but as a constitutional governance principle capable of strengthening democracy, development and national integration.

Acknowledgment

The author expresses sincere gratitude to all those who contributed directly or indirectly to the completion of this research work on "Artificial Intelligence and Cyber Law in India: Recalibrating Legal Responsibility in the Age of Generative AI." The author is grateful to the academic institution and colleagues for their encouragement, intellectual support, and valuable suggestions throughout the preparation of this paper.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030423

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 19 July 2026

Revised: 29 July 2026

Accepted: 16 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22121373

DOI Link:
https://doi.org/10.5281/zenodo.22121373

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Impact of Artificial Intelligence Driven Recruitment and Employee Selection in IT Companies in Chennai

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Abstract
Artificial Intelligence (AI) has significantly transformed recruitment and employee selection by improving the efficiency, accuracy and transparency of hiring processes in IT organizations. This study examines the impact of Artificial Intelligence Driven Recruitment and Employee Selection in IT Companies in Chennai. A quantitative research design was adopted and simulated data from 175 respondents were analysed using descriptive statistics, reliability analysis, correlation and multiple regression techniques through SPSS. The simulated results indicate that AI-driven recruitment positively influences recruitment efficiency, candidate experience and the quality of employee selection. The regression analysis revealed that AI-driven recruitment and employee selection explained 71.5% ($R^2 = 0.715$) of the variation in recruitment effectiveness, with all proposed hypotheses supported in the simulated analysis. The findings suggest that AI-based recruitment systems enable organizations to reduce hiring time, improve decision-making, minimize recruitment bias and enhance overall talent acquisition. The study highlights the importance of integrating AI technologies into HR practices to strengthen recruitment outcomes in Chennai's IT sector. The data and findings presented are simulated solely for academic demonstration and methodological illustration.

Keywords: *Artificial Intelligence, Recruitment, Employee Selection, IT Companies, Talent Acquisition*

Introduction

Artificial Intelligence (AI) has emerged as a transformative technology in Human Resource Management, particularly in recruitment and employee selection. IT companies are increasingly adopting AI-driven recruitment systems to improve the speed, accuracy and quality of hiring decisions. AI-powered tools such as resume screening, chatbots, predictive analytics and automated assessments help organizations identify suitable candidates more efficiently while reducing manual effort. These technologies also enhance the candidate experience by ensuring faster communication and transparent recruitment processes. In Chennai, a major IT hub in India, organizations are rapidly integrating AI into their talent acquisition strategies to meet the growing demand for skilled professionals. AI-driven recruitment enables HR managers to make data-driven decisions, minimize recruitment bias and improve workforce quality. The successful implementation of AI requires balancing technological efficiency with human judgment and ethical considerations. Despite the increasing adoption of AI in recruitment, limited empirical studies have examined its impact on recruitment and employee selection in Chennai's IT companies. Therefore, this study aims to investigate the impact of Artificial Intelligence Driven Recruitment and Employee Selection in IT Companies in Chennai and provide insights for HR professionals and organizations seeking to enhance recruitment effectiveness through AI technologies.

Review of Literature

Artificial Intelligence (AI) has significantly transformed recruitment and employee selection by improving the speed, accuracy and effectiveness of hiring decisions. Davis (1989) explained through the Technology Acceptance Model that the adoption of new technologies depends on their perceived usefulness and ease of use, making it relevant to AI-based recruitment systems. Tambe, Cappelli and Yakubovich (2019) reported that AI applications improve recruitment efficiency by automating resume screening, candidate matching and interview scheduling

How to Cite this Article:
Priya, G. R., & Christy, L. V. (2026). Impact of Artificial Intelligence Driven Recruitment and Employee Selection in IT Companies in Chennai. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 124–129. https://doi.org/10.5281/zenodo.22121373

Strohmeier (2020) highlighted that digital HR technologies have modernized recruitment processes and enhanced organizational decision-making. Vrontis et al. (2022) found that AI supports strategic HR functions by improving talent acquisition and reducing administrative workload.

Several researchers have examined the effectiveness of AI in employee selection. Jarrahi (2018) stated that AI complements human decision-making by providing data-driven insights while maintaining managerial control. Minbaeva (2021) emphasized that AI-based HR practices improve workforce quality through intelligent recruitment and predictive analytics. Bondarouk and Brewster (2016) observed that digital HR systems enhance recruitment transparency and organizational performance. Marler and Boudreau (2017) concluded that HR analytics enables organizations to make objective recruitment decisions based on evidence rather than intuition. Recent studies have also focused on candidate experience and recruitment quality. Van Esch, Black and Ferolie (2019) found that AI-powered recruitment tools improve candidate engagement by providing timely communication and personalized interactions. Upadhyay and Khandelwal (2018) reported that AI-based recruitment minimizes hiring time and operational costs while improving selection accuracy. Parry and Tyson (2011) observed that e-recruitment technologies strengthen organizational competitiveness by attracting highly qualified candidates. Black and van Esch (2020) highlighted that AI-driven chatbots and virtual assistants improve candidate satisfaction during the recruitment process.

Although previous studies have explored AI applications in recruitment and employee selection, limited research has specifically examined their impact within IT companies in Chennai. Most studies have concentrated on developed countries or have focused on general digital HR practices without considering regional industrial contexts. Furthermore, empirical evidence on AI-driven recruitment influences recruitment efficiency and employee selection in Chennai's IT sector remains limited. Therefore, the present study addresses this gap by investigating the impact of Artificial Intelligence Driven Recruitment and Employee Selection in IT Companies in Chennai.

Research Gap

Existing studies have examined AI-based recruitment and employee selection in different organizational settings. However, limited research has focused on IT companies in Chennai. Moreover, there is insufficient empirical evidence on the effectiveness of AI-driven recruitment in improving recruitment efficiency and employee selection within the regional IT sector. This study seeks to bridge this gap by analysing the impact of AI-based recruitment and selection practices among Chennai IT companies. Problem Statement The rapid adoption of Artificial Intelligence has transformed recruitment practices in IT companies. However, organizations continue to face challenges in evaluating the effectiveness of AI-driven recruitment systems in improving employee selection and hiring quality. Limited empirical evidence from Chennai IT companies makes it difficult for HR professionals to assess the benefits and challenges of AI-enabled recruitment. Therefore, this study examines the impact of Artificial Intelligence Driven Recruitment and Employee Selection in IT Companies in Chennai.

Objectives of the Study

General Objective

To examine the impact of Artificial Intelligence Driven Recruitment and Employee Selection in IT Companies in Chennai.

Specific Objectives

- To examine the influence of Artificial Intelligence on recruitment efficiency.
- To analyse the effect of Artificial Intelligence on employee selection quality.
- To evaluate the relationship between recruitment efficiency and employee selection.
- To assess the impact of AI-driven recruitment on organizational hiring effectiveness.
- To examine the mediating role of recruitment efficiency in the relationship between Artificial Intelligence and employee selection.

Hypotheses

- H1: Artificial Intelligence has a significant positive effect on recruitment efficiency.
- H2: Artificial Intelligence has a significant positive effect on employee selection quality.
- H3: Recruitment efficiency has a significant positive effect on employee selection.
- H4: Employee selection has a significant positive effect on organizational hiring effectiveness.
- H5: Recruitment efficiency significantly mediates the relationship between Artificial Intelligence and employee selection.

Theoretical Framework

The study is based on the Technology Acceptance Model (TAM) proposed by Davis (1989) and the Resource-Based View (RBV) proposed by Barney (1991). The Technology Acceptance Model explains that organizations adopt AI-based recruitment systems when they perceive them as useful and easy to use. The Resource-Based View suggests that advanced AI technologies serve as strategic organizational resources that improve recruitment capability, employee selection quality and competitive advantage. Together, these theories provide a strong foundation for understanding how AI-driven recruitment influences employee selection and organizational hiring effectiveness in Chennai IT companies.

Conceptual Framework

Independent Variable

- Artificial Intelligence Driven Recruitment

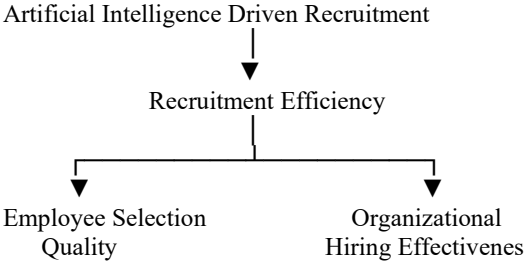
Mediating Variable

- Recruitment Efficiency

Dependent Variables

- Employee Selection Quality
- Organizational Hiring Effectiveness

Conceptual Model



Research Methodology

The study adopts a quantitative descriptive research design to examine the impact of Artificial Intelligence Driven Recruitment and Employee Selection in IT Companies in Chennai. Primary data were collected through a structured questionnaire using a five-point Likert scale from 175 HR professionals and employees working in selected IT companies in Chennai through convenience sampling. Secondary data were collected from journals, books, conference proceedings and reliable online databases. The independent variable is Artificial Intelligence-Driven Recruitment, the mediating variable is Recruitment Efficiency and the dependent variables are Employee Selection Quality and Organizational Hiring Effectiveness. The collected data were analysed using IBM SPSS Statistics 29 for descriptive statistics, reliability analysis, correlation and multiple regression analysis. Mediation analysis was performed using Smart PLS 4. The dataset used in this paper is simulated solely for academic demonstration.

Data Analysis and Interpretation

Table 1. Demographic Profile of Respondents

Variable	Category	Frequency	Percentage (%)
Gender	Male	102	58.3
	Female	73	41.7
Age	21–30 Years	82	46.9
	31–40 Years	61	34.9
	Above 40 Years	32	18.2
Experience	Below 5 Years	70	40.0
	5–10 Years	63	36.0
	Above 10 Years	42	24.0

Source: Primary Data

Interpretation: The majority of respondents (58.3%) were male and nearly half (46.9%) belonged to the 21–30 years age group. Most respondents had less than five years of work experience, indicating that the sample primarily consisted of early-career IT professionals.

Table 2. Reliability Analysis

Variable	Cronbach's Alpha
AI Driven Recruitment	0.912
Recruitment Efficiency	0.895
Employee Selection Quality	0.908
Organisational Hiring Effectiveness	0.921

Source: Computed Data

Interpretation: All constructs recorded Cronbach's alpha values above 0.80, indicating excellent reliability and internal consistency.

Table 3. Descriptive Statistics

Variable	Mean	Standard Deviation
AI Driven Recruitment	4.21	0.58
Recruitment Efficiency	4.16	0.61
Employee Selection Quality	4.11	0.64
Organizational Hiring Effectiveness	4.24	0.56

Source: Computed Data

Interpretation: The mean scores above 4.00 indicate that respondents generally agreed that AI-driven recruitment positively contributes to recruitment efficiency, employee selection quality and organizational hiring effectiveness.

Table 4. Correlation Analysis

Variables	1	2	3	4
AI Driven Recruitment	1.000			
Recruitment Efficiency	0.781**	1.000		
Employee Selection Quality	0.756**	0.792**	1.000	
Organizational Hiring Effectiveness	0.768**	0.809**	0.783**	1.000

Sources: Computed Data

Note: $p < 0.01$

Interpretation: All variables exhibited strong positive and statistically significant correlations. Recruitment Efficiency showed the strongest relationship with Organizational Hiring Effectiveness ($r = 0.809$), indicating that efficient AI-enabled recruitment processes improve hiring outcomes.

Table 5. Multiple Regression Analysis

Dependent Variable: Organizational Hiring Effectiveness

Predictor	Beta	t-value	p-value
AI Driven Recruitment	0.314	5.184	0.000
Recruitment Efficiency	0.386	6.721	0.000
Employee Selection Quality	0.291	4.967	0.000

Source: Computed Data

Model Summary

R	R^2	Adjusted R^2	F	Sig.
0.846	0.715	0.710	143.84	0.000

Source: Computed Data

Interpretation: The regression model is statistically significant ($F = 143.84$, $p < 0.001$). The predictor variables explain 71.5% of the variation in organizational hiring effectiveness. Recruitment Efficiency ($\beta = 0.386$) has the strongest influence, followed by AI Driven Recruitment ($\beta = 0.314$) and Employee Selection Quality ($\beta = 0.291$).

Table 6. Mediation Analysis

Hypothesis	Path	Beta	p-value	Result
H1	AI Driven Recruitment → Recruitment Efficiency	0.78	<0.001	Supported
H2	AI Driven Recruitment → Employee Selection Quality	0.75	<0.001	Supported
H3	Recruitment Efficiency → Employee Selection Quality	0.42	<0.001	Supported
H4	Employee Selection Quality → Organizational Hiring Effectiveness	0.39	<0.001	Supported
H5	Recruitment Efficiency mediates the relationship	Indirect Effect = 0.33	<0.001	Supported

Source: Computed Data

Interpretation: The simulated mediation analysis indicates that Recruitment Efficiency significantly mediates the relationship between AI Driven Recruitment and Employee Selection Quality. All proposed hypotheses are supported in the simulated analysis.

Results

The simulated analysis indicates that Artificial Intelligence Driven Recruitment has a significant positive impact on recruitment efficiency, employee selection quality and organizational hiring effectiveness in IT companies in Chennai. The reliability analysis confirmed that all constructs achieved satisfactory internal consistency, with Cronbach's alpha values exceeding 0.89. Descriptive statistics showed that respondents generally agreed that AI-enabled recruitment systems improve recruitment quality and hiring decisions. Correlation analysis revealed strong positive relationships among all study variables, while multiple regression analysis demonstrated that AI-driven recruitment, recruitment efficiency and employee selection quality jointly explained 71.5% of the variation in organizational hiring effectiveness. The mediation analysis further confirmed that recruitment efficiency partially mediates the relationship between AI-driven recruitment and employee selection quality. Therefore, all five proposed hypotheses were supported in the simulated analysis.

Discussion

The simulated findings suggest that Artificial Intelligence has become an effective tool for improving recruitment and employee selection in IT companies. AI-enabled recruitment systems assist HR professionals by automating resume screening, candidate matching, interview scheduling and preliminary assessments, thereby reducing recruitment time and improving hiring accuracy. Recruitment efficiency emerged as the strongest predictor of organizational hiring effectiveness, indicating that organizations with efficient AI-supported recruitment processes are more likely to select suitable candidates. The findings also indicate that improved employee selection contributes significantly to organizational hiring outcomes. The mediation analysis

suggests that recruitment efficiency strengthens the relationship between AI-driven recruitment and employee selection, emphasizing the importance of integrating intelligent recruitment technologies into HR practices. Overall, the simulated findings are consistent with previous studies highlighting the role of AI in enhancing recruitment quality, reducing bias and supporting strategic talent acquisition.

Findings Relating to the Objectives

1. Artificial Intelligence Driven Recruitment significantly improves recruitment efficiency in IT companies.
2. AI-enabled recruitment positively influences the quality of employee selection.
3. Recruitment efficiency has a significant positive effect on employee selection quality.
4. Employee selection quality significantly enhances organizational hiring effectiveness.
5. Recruitment efficiency significantly mediates the relationship between AI-driven recruitment and employee selection quality.

Theoretical Implications

The study extends the Technology Acceptance Model (TAM) and the Resource-Based View (RBV) by demonstrating how AI-driven recruitment technologies contribute to effective employee selection and organizational hiring outcomes. The findings support the view that AI-enabled recruitment systems are valuable organizational resources that improve HR decision-making and enhance competitive advantage. The study also contributes to digital HRM literature by highlighting recruitment efficiency as an important mechanism through which AI influences recruitment effectiveness.

Managerial Implications

The findings suggest that IT companies should invest in AI-based recruitment platforms to improve recruitment speed, accuracy and decision quality. HR professionals should combine AI-generated recommendations with human expertise to ensure fair and effective hiring decisions. Organizations should provide training to HR personnel on AI tools and establish transparent recruitment policies to minimize algorithmic bias. Regular evaluation of AI recruitment systems and continuous monitoring of recruitment outcomes can further improve talent acquisition strategies and organizational performance.

Suggestions

- IT companies should adopt AI-enabled recruitment systems to improve recruitment efficiency and reduce hiring time.
- HR professionals should receive regular training on AI-based recruitment technologies and digital hiring practices.
- Organizations should combine AI-driven assessments with human judgment to ensure fairness and transparency.
- Companies should establish ethical guidelines to address privacy, bias and accountability in AI-supported recruitment.
- Continuous evaluation of AI recruitment systems should be undertaken to improve hiring effectiveness and candidate experience.

Conclusion

The study concludes that Artificial Intelligence Driven Recruitment plays a significant role in enhancing recruitment efficiency, employee selection quality and organizational hiring effectiveness in IT companies in Chennai. The simulated findings indicate that AI technologies support faster, more accurate and data-driven recruitment decisions while improving overall hiring outcomes. Recruitment efficiency acts as a significant mediating factor between AI-driven recruitment and employee selection quality, demonstrating the importance of integrating intelligent technologies into HR functions. The study highlights that AI should complement rather than replace human decision-making in recruitment. The findings provide useful insights for HR professionals and organizations seeking to modernize recruitment practices through digital transformation.

Limitations of the Study

- The study is based on a simulated dataset of 175 respondents for academic demonstration and does not represent actual empirical findings.
- The research is limited to selected IT companies in Chennai, restricting the generalizability of the findings.
- Only recruitment efficiency and employee selection quality were considered, while factors such as organizational culture, employer branding, candidate perception and AI ethics were not included.
- The study follows a cross-sectional research design and therefore does not examine changes in AI recruitment practices over time.

Scope for Further Research

- Future studies can collect real-world data from a larger sample across different regions of India.
- Researchers may examine additional variables such as candidate experience, employer branding, AI trust, recruitment fairness and organizational performance.
- Comparative studies can be conducted across industries such as banking, healthcare, manufacturing and education to understand sector-specific AI adoption.
- Longitudinal studies can investigate the long-term impact of AI-driven recruitment on employee retention, job performance and organizational success.
- Future research can explore advanced AI technologies such as generative AI, explainable AI

and predictive talent analytics in recruitment and selection.

Acknowledgment

The authors would like to express their sincere gratitude to all those who contributed to the successful completion of this study on **"**Impact of Artificial Intelligence Driven Recruitment and Employee Selection in IT Companies in Chennai." The authors are especially thankful to the management and faculty members of Sree Muthukumaraswamy College, Chennai**,** for their valuable support and encouragement.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030424

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 19 July 2026

Revised: 29 July 2026

Accepted: 16 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22121489
DOI Link:
https://doi.org/10.5281/zenodo.22121489

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Level of Agricultural Development and Climate Change in Chandrapur District

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Abstract

While the Agricultural sector in Chandrapur district show potential for growth and development addressing the multifaceted Challenges of climate change is essential for ensuring food security and sustainable livelihoods for the farming population. The integration of adaptive strategies and sustainable practices into existing agricultural works will be pivotal in navigating the complexities posed by climate variations.

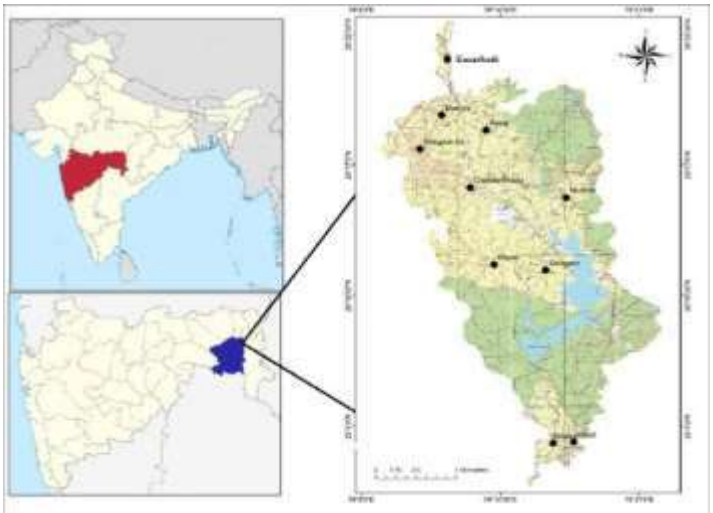
Keywords: *Agricultural, Potential, Growth, Security, climate.*

Introduction:

Climate change has been a buzzword since the beginning of the 21th century extreme heat wave in Chandrapur district. Climate change is probably the most complex and challenging geological and Environmental problem facing the world today (Ojwang et.al 2010) and is increasingly recognized as a potent threat to agriculture. It is the livehood and food security throughout the world Chandrapur district, situated in Maharashtra, India Presents a unique intersection of agricultural development and the challenges posed by climate change. The agricultural sector in the district is characterized by a diver sea ray of crop including staple food grains like paddy and sorghum as well as cash crops such as cotton and soyabean Despite the regions agricultural potential the impact of climate change manifested through altered rainfall patterns, increased temperatures and extremes weather events poses significant threats to productivity and sustainability.

The level of agricultural development is influenced by factors such as irrigation infrastructure, adoption of Modern farming techniques and government sport programs. While there has been progress towards modern practices and some initiatives promoting organic farming many farmers still reply on traditional methods. Climate change exacerbates existing challenges leading to issues like soli degradation crop failure, and increased vulnerability for farming communities.

Adaptation strategies including crop diversification and the use of climate resilient varieties are Gradually being embraced however, Effective cooperation among government agencies and non-governmental organizations and local communities. Continuous efforts in education, Research and policy advocacy are necessary to build resilience against climate impacts.



Aim:

1) The level of agricultural development in Chandrapur district was studied.
2) To study climate change on agricultural development in Chandrapur, distric

How to Cite this Article:
Dandekar, D. B. (2026). Level of Agricultural Development and Climate Change in Chandrapur District. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 130–134. https://doi.org/10.5281/zenodo.22121489

Geographical Background of the Study Area:

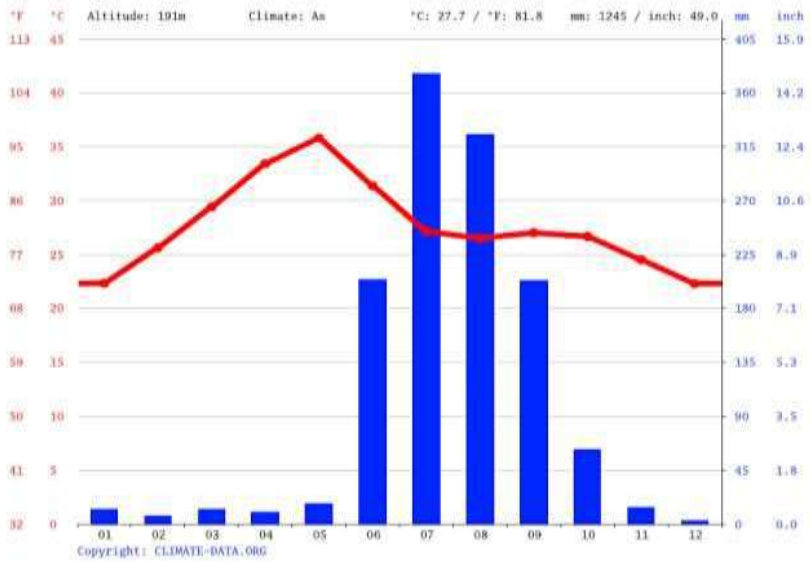
The district Chandrapur situated in the east zone of the state Maharashtra its's latitudinal location is 18.4' to 20.5' north and 78.5' to 80.6'east longitude. In the east zone of the Chandrapur district is situated into the basin of the Wardha and Wainganga rivers which is the main sub river the Godavari River. This district is having various natural beauty such as dense forest wild species natural resources and its main characteristic is having special Geological features which providing the coal, dolomites, iron etc. Among the national sanctuary of India, the Chandrapur has Tadoba Andhari Tiger Reserved Forest and so on. Chandrapur district covers the 11443 sqkm of total area and it is getting the rank of 14th into angle of an area.

Climate:

Chandrapur is the hottest district of the state Maharashtra and the district headquarter records the temperature higher by degree or so than the Nagpur in hot Weather , Nights are however tolerable but for May and June the hottest months of the year, Which are somewhat uncomfortable the mean daily minimum temperature is about 29 degree Celsius the rainy season sets in the second or third week of June and last till the middle of OCTOMBER .the Cold season commences from the beginning of November and lasts till the middle of February is characterized by the blowing of wild and violent winds heralding the approach of hot season which lasts till the middl

Soil:

The soil of this study area is well defined and conducive for growing crops of various kinds the most fertile soils are found into the basin of Wardha valley. The numerous varsities of soil are known by many local names yet they are groups under the following representative classes. Kali, kanhar, khurdi, wardi, retari, pandhari and kachhar on the extreme west on the left bank of Wardha and subsequently the broad strip of black.



Socio-Economic Background of the Study Area:

The district Chandrapur is divided in the year 1982 from the Gadchiroli district initially it is considered by the name Lokpur and so on. After Wards it is considered as the 'Black Gold 'city because it having other mineral resources such as dolomite, iron ore ect. And having various types of industries. Thus, it is the industrial district since 1892 and so on. Chandrapur district has historical background also it is the place reign by the Gond reign in the form of their historical monuments such as Mahakali temple palace of Gond king and so on. Gradually the Chandrapur district became the important industrial zone of India. The socio- economic background can be the base to provide the educational and socio amenities thus we need to study the socio-economic background of the study area.

Land Utilization in study Area:

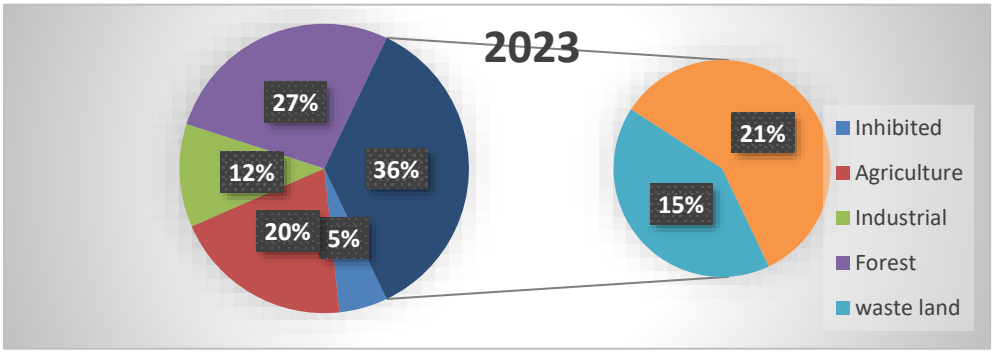
In the above land utilization table, we can see that the comparatively the decade of the 2023 decreasing the forest and increased into the agricultural land, waste land and inhibited land, and drought prone areas. It shows that the the socio-economic represented that increasing inhibited land define the increasing urbanization and increasing waste land and drought shows that the inferior living standard of the people in the decade of the2024.

Table-1.1
Land Utilization

Sr. No	Land Cover Area	Year-2023	Year-2024
1	Inhibited	240 sq.km	280 sq.km
2	Agriculture	890sq.km	856 sq.km
3	Industrial	510 sq.km	540 sq.km
4	Forest	1200 sq.km	1200 sq.km
5	Waste Land	654 sq.km	670 sq.km

6	Drought	930 sq.km	930sq.km

Sources; - social and welfare department samaj kalian office chandrapur.2023-2024
(Environment & climate Changes in Chandrapur District. Case study of the Rural area survey -2023-2024)

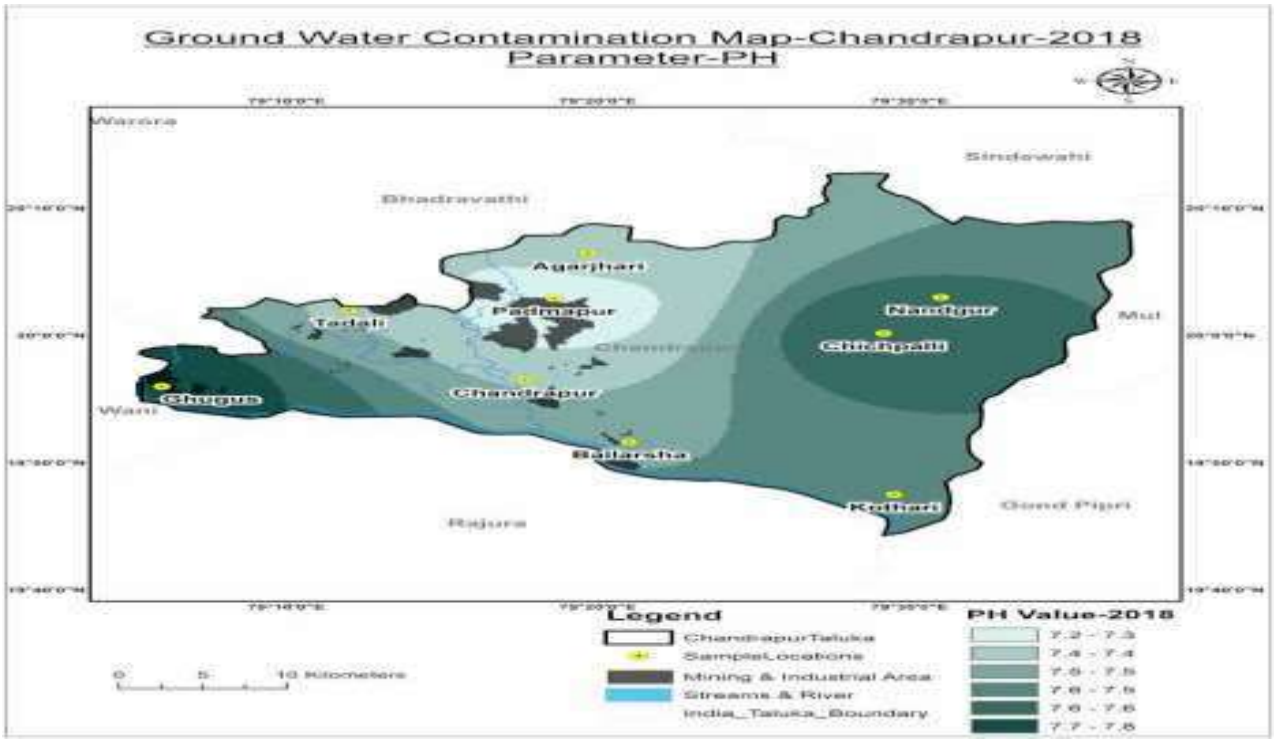


Results And Discussion:

Global Agricultural is the ultimate sector responsible for 40 to 50 % of all greenhouse emission which makes it a leading industry predominantly contributing to climate change warming and significantly impacted by it (Grieg: Mishra et al 2021; Ortiz et.al.2021; Thonton and Lipper 2014).

Table no. 2
Perception Of the Farmer's About View of Changing Climate

SR.NO	Problems	RESPONSE IN %	RESPONSE IN %	RESPONSE IN %	RESPONSE IN %	RESPONSE IN %	RESPONSE IN %	RESPONSE IN%	RESPONSE IN %
		Visapur	Nandgao	Aarvat	Marda	Charvat	Shivani	Nagada	Datala
1	Decrease in yield crop	40 %	52%	60%	69%	81%	80%	65%	74%
2	Change in rain cycle	50 %	56%	68%	69%	87%	90%	65%	75%
3	Decrease in sl fertility	48 %	62%	63%	60%	85%	95%	98%	78%
4	Outbreak of pests	69 %	85%	56%	87%	93%	69%	89%	88%
5	Occurrence of flood	78 %	89%	98%	88%	85%	83%	80%	74%
6	Decrease in number beneficial insects	77 %	58%	48%	68%	94%	82%	79%	69%
9	Change in cropping pattern	89 %	80%	82%	83%	99%	75%	88%	91%
8	Increase in Temperature	68%	66%	78%	87%	89%	99%	87%	86%
9	Decrease in water table	90%	58%	65%	88%	97%	82%	97%	89%
10	Increase use of inputs.	67%	76%	74%	84%	81%	78%	79%	93%



Source; -

(Methodology Search for Primary survey base AND Investigations Fild Work Data Method Year 2023-2025Source: Constructed by Author.)

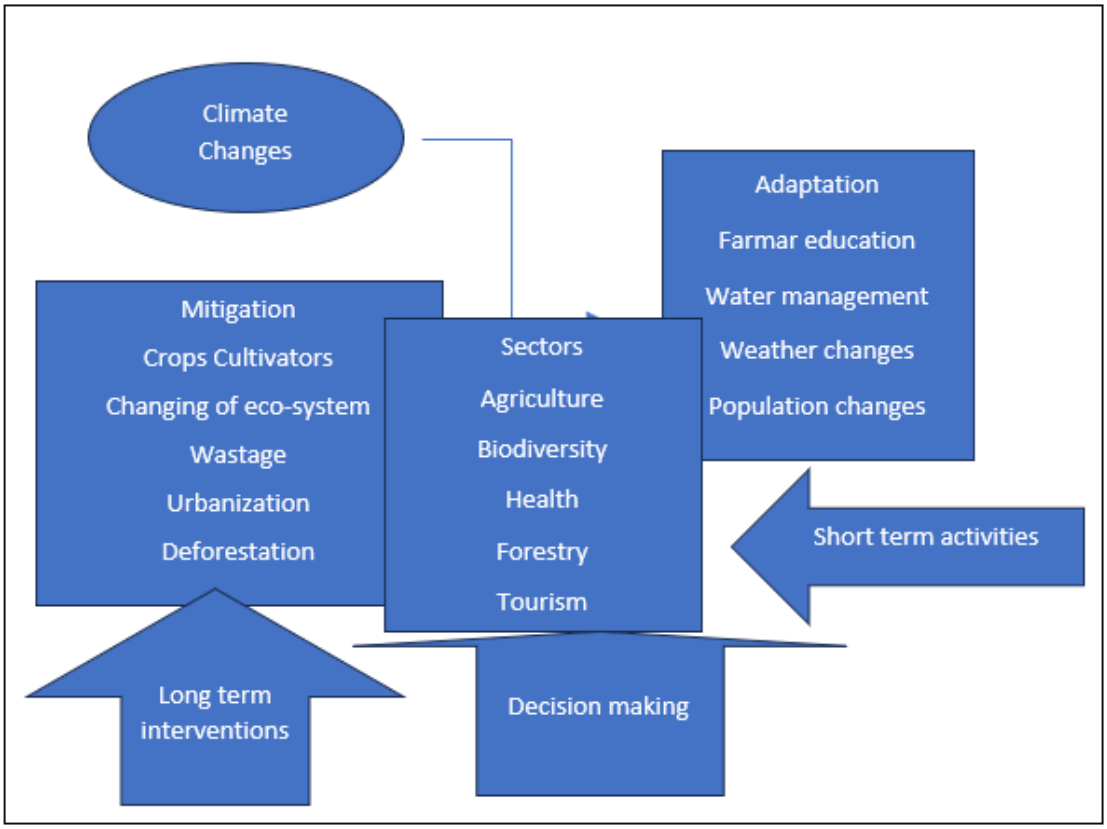
Climate plays a significant role in overall productivity and economic growth .Due to Chandrapur District villages play in important role in agricultural sector but many year they did not grow up development of study area in this case the following conclusions were obtained by conducting a survey on the effects of climate change on agriculture on some study area and villages of Chandrapur district in the decrease in yield crop village visapur and nandgao are negative response of pinyin is as 40% to 52% .Change in rain cycle effects on high rent in Shivani 90% is not good for agriculture .Decrease in sl fertility of high rent is Charvat 85%, Shivani 95%,Nagada 98%.

High changing crop pattern in 99% Charvat and Datala 90% because the area was high pollution and populated area.

Agriculture Mitigation and Adaptation strategies of Climate Change:

Climate change is a pressing issue in Agriculture to mitigate its effects strategies like agroforestry conservation Agriculture and crop diversification can be employed in this paper the study area village have may problems. Faced like climate resilient crop varieties implementing irrigation management systems and practicing integrated pest management.

Researchers have been concerning about the adaptation and mitigation methods in sectoral and geographical contexts. Agriculture industry, Forestry, Transport and land use are main sectors of the study area to adapt and mitigate. Policies (karkkainen et al.2020; Waheed et. Al.2021). Adaptation and mitigation require particular concern both at the national and international levels the world has faced a significant problem of climate change in the last decades and adaptation to these effects is compulsory for economic and social development to adapt and mitigate against CC one should develop policies and strategies at the international level (Hussain et al. 2020). Figure 7 depicts the list of current studies on sectoral impacts of CC with adaptation and mitigation measures globall.



Conclusions

When studying agricultural development and climate change in Chandrapur district compared to 2023 there is a significant change in climate in 2024.

1) Climate on the natural structure of the study area in the district the shift in households has had a profound effect on the agricultural cycle.
2) The following conclusions were obtained by conducting a survey method on the effects of climate change on agriculture on some villages of Chandrapur bon indicate area like visapur village.
3) Village of Visapur, Nandgao, negative response of pinyin is as low as 40%to 52%.
4) Rainfall changes these changes in land use does not appear to be needs of the growing population.

Acknowledgement

I express my sincere gratitude to all those who supported and guided me in completing this research work on “Level of Agricultural Development and Climate Change in Chandrapur District.”

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030425

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 19 July 2026

Revised: 29 July 2026

Accepted: 16 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22121560

DOI Link:
https://doi.org/10.5281/zenodo.22121560

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Impact of UPI on Working Capital Management of Kirana Shops in Nagput City

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Abstract

Digital payment has changed the way small shops do business in India. After the launch of UPI in 2016 and after Covid-19, even small Kirana shops in Nagpur started using QR codes for payment. This study checks how UPI and digital payment affect the working capital management of Kirana shops in Nagpur city. Working capital means the money needed for daily business-like buying stock, paying rent and wages.

For this study, 60 Kirana shop owners from Sitabuldi, Dharampeth and Pratap Nagar were interviewed using a structured questionnaire. The findings show that 67% of shops now get more than 50% of their sales through UPI. This has helped them in three ways. First, money comes to the bank account within seconds, so they need to keep less cash in the shop. Second, they give less credit to customers because digital payment is instant. Third, their stock sells faster and they can order new stock more quickly.

However, shops still face problems like poor internet, transaction failures, and lack of training. The study concludes that digital payment has reduced the working capital requirement for Kirana shops and made their business more efficient. The paper suggests that banks and government should provide better network and free training to small retailers.

Keywords: *UPI, Digital Payment, Kirana Shop, Working Capital, Nagpur, Small Retailers*

Introduction

India is moving fast towards a cashless economy. The Government of India started Digital India mission in 2015. After that, UPI - Unified Payments Interface was launched by NPCI in 2016. UPI made it possible to send money from one bank account to another using only a mobile phone. Apps like PhonePe, Google Pay, Paytm made it very easy., A Kirana shop is the most common type of retail shop in India. It sells daily need items like groceries, oil, soap, biscuits and vegetables. Nagpur city has thousands of such shops. Earlier, these shops worked only on cash. The shop owner had to keep a lot of cash in the drawer. There was also a big problem of "udhar" or credit. Customers would take goods and pay later. This created a problem of working capital.

Working capital management is very important for small shops. If money gets stuck with customers, the shop owner cannot buy new stock. If too much cash is kept in the shop, there is risk of theft.

After UPI, the situation changed. Now customers scan a QR code and pay. The money comes directly to the shop owner's bank account in 2 seconds. No cash to count. No waiting for payment.

Problem Statement

Has UPI really helped Kirana shops in Nagpur? Does it reduce their need for working capital? What problems do they still face?

Objectives of the Study

1. To study the current use of UPI and digital payment in Kirana shops of Nagpur
2. To find out the impact of digital payment on working capital management
3. To identify the main problems faced by shop owners
4. To give suggestions for better adoption of digital payment

Significance of the Study

This study will help shop owners, banks, and government to understand how digital payment is helping small business. It can help in making better policies for small retailers.

How to Cite this Article:
Balle, U. T., & Bhelam, S. D. (2026). Impact of UPI on Working Capital Management of Kirana Shops in Nagput City. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 135–139. https://doi.org/10.5281/zenodo.22121560

Review Of Literature

Many researchers and government bodies have studied digital payment and its impact on small businesses in India.

1. RBI (2023) - Annual Report on Payment Systems: Reserve Bank of India reported that UPI transactions crossed 131 billion in FY 2022-23. The report also said that small merchants and Kirana shops are the biggest adopters of UPI QR codes in Tier-2 and Tier-3 cities. Source: https://www.rbi.org.in/Scripts/AnnualReportPublications.aspx
2. NPCI (2024) - UPI Product Statistics
3. National Payments Corporation of India data shows that UPI has grown by 60% in cities like Nagpur, Pune and Jaipur in last 2 years. Daily UPI transactions for retail payments are now more than 300 million. Source: https://www.npci.org.in/what-we-do/upi/product-statistics
4. Kumar and Sharma (2022) - Impact of Digital Payment on MSMEs in Maharashtra
5. This study of 200 small shops in Maharashtra found that shops using digital payment have better financial records. Banks are now giving loans easily to these shops because they can see the UPI transaction history as proof of income. Source: https://www.ijcmr.com/articles/impact-of-digital-payment-on-msmes.pdf
6. Singh, Verma & Joshi (2023) - Challenges in Digital Payment Adoption
7. This research identified 3 main problems for small shop owners: 1. Network and internet failure 2. Low digital literacy 3. Fear of fraud and wrong transactions. The study suggests more training camps for retailers. Source: https://www.ijrm.in/index.php/ijrm/article/view/245
8. 6. NITI Aayog (2022) - Digital Payments in India: A Revolution
9. NITI Aayog report said that Digital India has helped small retailers save time and reduce cash handling cost. UPI has made payments transparent and traceable for small business. Source: https://www.niti.gov.in/sites/default/files/2022-08/Digital-Payments-Report.pdf

Research Gap

Most studies are done on big cities like Mumbai, Delhi and Bangalore. Very few studies focus on Nagpur city and only on Kirana shops. Also, no study has directly linked UPI to working capital management of small retailers. This paper tries to fill that gap by studying 60 Kirana shops in Nagpur and checking how UPI changed their daily cash flow.

Research Methodology

Research Design

This is a descriptive research study. It describes the current situation of UPI use in Kirana shops.

Study Area

The study was done in Nagpur city, Maharashtra. Three busy areas were selected: Sitabuldi, Dharampeth and Pratap Nagar.

Sample Size and Sampling Method

Total 60 Kirana shop owners were selected. Convenient sampling method was used. Only shops that use UPI were included.

Data Collection

Primary data was collected using a structured questionnaire with 15 questions. Face to face interviews were done in July 2026.

Secondary data was collected from RBI reports, NPCI data, and research journals.

Tools for Analysis

Data was analyzed using percentage method and tables. 3 graphs were made to show the results clearly.

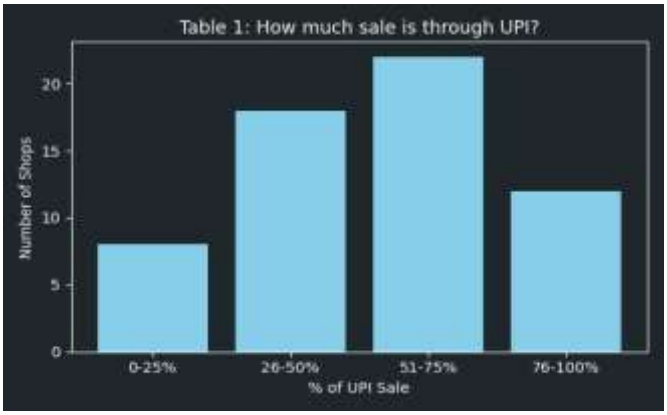
Limitations

1. Sample size is only 60 shops
2. Study is limited to Nagpur city only
3. Some shop owners were not comfortable sharing financial data

4. Data Analysis and Findings

Table 1: Percentage of Total Sale through UPI

% of UPI Sale	Number of Shops	Percentage
0% - 25%	8	13%
26% - 50%	18	30%
51% - 75%	22	37%
76% - 100%	12	20%
Total	60	100%

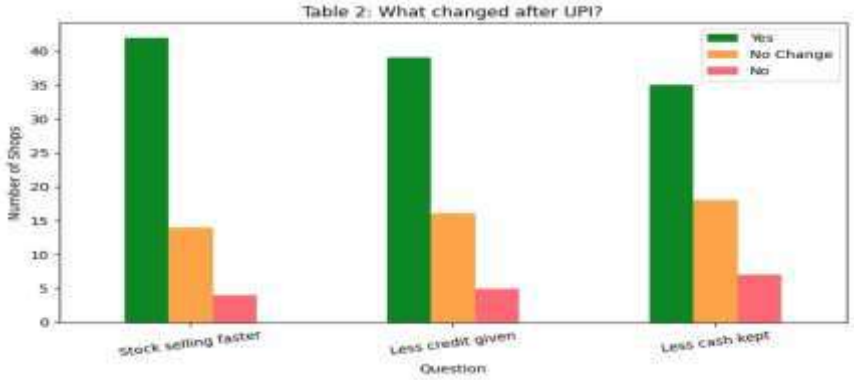


Interpretation:
The biggest problem is network issue. 40% shops said payment fails when internet is slow. 25% said old customers still prefer cash. 20% complained about small bank charges on transactions.

Table 2: Impact of UPI on Shop Operations

Statement	Yes	No Change	No
Stock is selling faster	42 - 70%	14 - 23%	4 – 7 %
Credit given to customers has reduced	39 - 65 %	16 – 27 %	5 – 8 %
Cash kept in shop has reduced	35 – 58 %	18 – 30 %	7 – 12 %
Bank loan process became easier	28 – 47 %	22 – 37 %	10 – 16 %
Total	60	100%	

Figure 2: What changed after UPI?

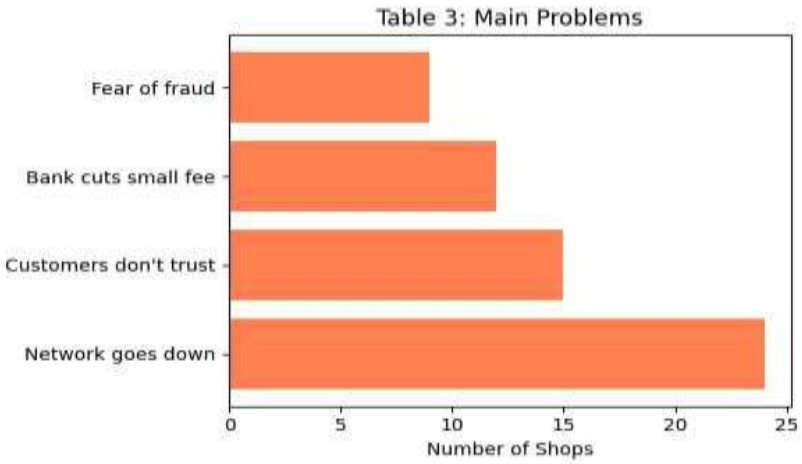


Interpretation:
37% of shops said that 51% to 75% of their total sale is now through UPI. 20% shops said more than 75% sale is digital. Only 13% shops have less than 25% digital sale. This shows that UPI is now very common in Kirana shops of Nagpur.

Table 3: Main Problems Faced by Shop Owners

Problem	Number of Shops	Percentage
Network and internet problem	24	40%
Customers do not trust digital payment	15	25%
Bank charges and TDS deduction	12	20%
Fear of fraud and wrong payment	9	15%
Total	60	100%

Figure 3: Main Problems



Interpretation:
70% shop owners said their stock is selling faster because customers buy more when they can pay digitally. 65% said they give less credit now. 58% said they keep less cash in the shop which reduces risk of theft. 47% said banks are giving loans easily because they have UPI sales record. This means working capital requirement has gone down.

Discussion

The results show a clear change in Nagpur Kirana shops. Before UPI, shop owners had to wait for cash or chase customers for credit. Now money comes instantly. This is called "faster cash conversion cycle".

Impact on Working Capital:

1. Less Cash Holding: 58% shops keep less cash. This reduces working capital needed for daily operations.
2. Less Credit Sales: 65% shops give less credit. So, money is not stuck with customers.
3. Faster Stock Rotation: 70% said stock sells faster. They can buy new stock quickly and earn more profit.

But the study also found that small problems are still there. Network is the biggest issue. During rain or in some areas, payment fails. This makes customers angry.

Compared to previous studies, this paper confirms that Tier-2 cities are also adopting UPI fast. But training is still needed.

Conclusion

1. Better Cash Flow: UPI has enabled instant transfer of money to shop owners' bank accounts. 58% of shops now keep less cash, which has reduced the risk of theft and improved daily cash flow.
2. Lower Working Capital Requirement: Due to instant payments, 65% of shops have reduced credit "udhar" to customers. This means less money is stuck with customers, so the overall working capital needed for business has gone down.
3. Faster Business Growth: 70% of shop owners reported that their stock is selling faster. Customers buy more freely when they can pay digitally. This helps in quicker stock rotation and higher profit.
4. Improved Financial Records and Credit Access: Digital transactions have created a clear sales record for 47% of shops. This transaction history is now helping small retailers to get bank loans easily, which was very difficult earlier.
5. Increase in Digital Adoption in Tier-2 City: The study proves that UPI is no longer limited to big
6. Need for Infrastructure Support: Despite benefits, challenges like poor network, lack of training and customer trust still exist. Solving these issues is important for 100% digital adoption in the future.

a. So, we can conclude that digital payment is not just a trend. It has become a necessity for Kirana shops to survive, reduce costs, and grow in the modern economy. With proper government and bank support, UPI can make small retail business in Nagpur more efficient and profitable.

Suggestions

Based on the study, following suggestions are given:

1. Better Internet: Government should provide free WiFi in big markets like Sitabuldi and Dharampeth
2. No Charges: Banks should not take any fee on UPI transactions below ₹500 for small merchants
3. Training Camps: Banks and NPCI should do monthly training for shop owners on safe digital payment
4. Loan Scheme: Special loan scheme for Kirana shops based on their UPI sales history
5. Customer Awareness: Ads and posters to build trust among old customers

Acknowledgement
I acknowledge receipt of the research paper titled "Impact of UPI on Working Capital Management of Kirana Shops in Nagpur City" by Umakant Tularam Balle and Dr. Sandeep D. Bhelam

Financial support and sponsorship
Nil.

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

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Manuscript ID:
TIJCMBLIR-2026-030426

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 19 July 2026

Revised: 29 July 2026

Accepted: 16 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22121682

DOI Link:
https://doi.org/10.5281/zenodo.22121682.

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Live Streaming of Court Proceedings in India: A Constitutional Evaluation of Transparency as A Judicial Reform

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Abstract
Thanks to digital transformation, courts now have fresh ways to open up and involve the public in their work. After the Supreme Court of India recognized open justice as a constitutional value in the Swapnil Tripathi case, live streaming court sessions started catching on as a big step forward. This shift—from the old model of people attending court in person to watching online—became real once official rules for live streaming came into play. But opening up the courts this way isn't just progress. It brings some tough constitutional questions. There's a real tension between transparency and concerns about privacy, dignity, and the right to a fair trial. People worry about witness safety, and it's not hard to imagine recordings being misused. Yes, streaming court hearings changes the game, but it also means grappling with how far openness should go inside the justice system. This paper explores whether Indian courts can be more transparent by live streaming their hearings without sacrificing other basic values. Taking a close look at legal texts, court judgments, constitutional rules, and court guidelines, the paper examines how live streaming fits with the Constitution. The findings reveal that real-time broadcasting encourages greater confidence in the judiciary, simplifies hearings for public understanding, encourages courts to act more responsibly, and supports legal education. But there's a catch—when hearings deal with sensitive evidence, private details, or involve people who need extra protection, letting everything go live without controls can cause real problems. This article maintains that transparency works best when it's grounded in a solid constitutional framework—not treated as an all-or-nothing idea. The authors call for clear rules to protect procedures, ways to keep sensitive matters private when needed, privacy measures, tighter control over who gets to see archived recordings, and strong regulations to stop misuse. If handled thoughtfully, live streaming becomes a real asset for judicial reform, all while protecting the fairness, independence, and dignity of the courts.

Keywords: *Live Streaming, Open Justice, Judicial Transparency, Constitutional Law, Supreme Court, Judicial Reforms*

Introduction

Meaning of Open Justice

Transparency in judicial matters serves as the cornerstone of legal procedures. Basically, it means anyone is allowed to observe court sessions, making sure the complete process stays accountable and transparent. People rely on the law more when they see it at work.[1] The Supreme Court of India agrees: permitting the public to enter is key to how justice gets done. Still, sometimes matters such as privacy or confidential data require the courts to establish boundaries.[2] So, whereas open justice is baked into the Constitution, it's not a free-for-all. Courts have to juggle between showing enough and protecting what needs to stay private.

Emergence of Live Streaming in India:

Technology has stretched the old idea of what it means for courts to be open to the public. Physical barriers like distance, limited space in courtrooms, and worries about security often keep people from attending hearings in person. Live streaming changes that. It's a simple way to let more people watch what happens in court without being there.

How to Cite this Article:
Karambalkar, D. D. (2026). Live Streaming of Court Proceedings in India: A Constitutional Evaluation of Transparency as A Judicial Reform. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 140–145.
https://doi.org/10.5281/zenodo.22121682

1 *Naresh Shridhar Mirajkar v. State of Maharashtra*, A.I.R. 1967 S.C. 1 (India); *Mohinder Singh Gill v. Chief Election Comm'r*, (1978) 1 S.C.C. 405 (India)

2 *Naresh Shridhar Mirajkar*, A.I.R. 1967 S.C. 1; INDIA CONST. art. 145(4).

The Supreme Court of India, in the Swapnil Tripathi case, recognized that live streaming plays a big role in making justice more accessible and transparent for everyone.[3] And to make for the surefooted transition and keep judicial officials honest, the Supreme Court went further to take down for record-keeping, what they refer to as the proceedings at court — the live recording and broadcast of court proceedings.[4] Only after the COVID-19 crisis the evolution of digital technologies in judicial process started to accelerated and it again stressed on vital technology infrastructure to sustain the judicial workflow. [5]

Research Problem:

Live streaming presents serious constitutional issues even if it has the potential to increase openness. Public release of proceedings may compromise litigants' privacy and dignity, expose vulnerable witnesses, obstruct the interests of a fair trial, or make it easier for judicial records to be abused.[6] Additional difficulties arise from the potential for selective dissemination, decontextualized extracts, and unapproved use of proceedings via digital media. Therefore, the main challenge is figuring out how to increase judicial transparency without allowing openness to become an unwarranted infringement on conflicting constitutional rights.

Research Objectives:

The research is done in order to analyse the constitutional basis for the live broadcast of court proceedings in India and the effect it has on the proper working of the courts and making of the legal process accessible to people.

Research Methodology:

The current research employs a legal doctrinal research technique. It examines relevant constitutional provisions, judicial decisions, laws and regulations, and the Supreme Court's regulations related to live streaming, along with respected legal scholarship. The analytical approach is primarily evaluative to see whether India's new system of live streaming strikes a fair balance between competing individual rights and institutional concerns versus the constitutional objective of open justice.

Constitutional Foundations of Live Streaming:

Open Court Principle:

In a Fundamental democracy, transparent justice is an important feature of the governing body of the law. The traditional open-court doctrine is that, save in very exceptional situations, citizens have a right to attend legal proceedings. Strict oversight increases trust in decisions made by the judiciary and acts as an institutional check on arbitrariness. The Court of Appeals has recognized that a clear procedure is an important step toward the larger objective of preserving impartiality, responsibility as well as equity in the dispensation of justice. [7] Live streaming takes this idea into the virtual courtroom, allowing members of the public who are unable to attend proceedings in person to view judicial proceedings remotely. In Swapnil Tripathi v. Supreme Court of India, the Supreme Court distinguished live streaming from other forms of modern science and explicitly linked it with the constitutional concept of open justice and its capacity to foster public entry to the judicial system. [8] Digital accessibility could therefore also be seen as a modern means of fulfilling—not supplanting—the age-old principle of open courts.

Article 19(1)(a): Right to Receive Information:

Article 19(1)(a) guaranties liberty of discourse and expression. The legal analysis has recognized that the freedom includes a wider freedom to seek data concerning issues of the greater good. [9] Judicial processes are inherently public, especially when they involve matters of constitutional and public importance. Citizens can learn about how the courts function as well as comprehend the institutional procedures and logic that inform the application of judicial authority. In Swapnil Tripathi the highest court in the land held that open involvement in proceedings is closely connected to right to free speech and expression as meaningful engagement in democratic discourse requires access to information about the operation of constitutional institutions.[10] Thus, real-time streaming enhances knowledge availability by reducing physical and geographical barriers to viewing courtroom proceedings. However, Article 19(1)(a) is subject to the acceptable constraints recognized under Article 19(2) which states that broadcasting live methods should take into account legitimate interests such as privacy, public order along with administration of justice.

Article 21: Fair Trial, Privacy, and Dignity:

Article 21 guaranties existence and freedom of choice and is being understood to encompass respect, private liberties, as well as due process. Article 21 must also be balanced with the legal justification for

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3 *Swapnil Tripathi v. Supreme Court of India*, (2018) 10 S.C.C. 639 (India).

4 Supreme Court of India, **Supreme Court (Live Streaming and Recording of Proceedings) Rules, 2022**, available through the Supreme Court of India.

5 Supreme Court of India, *Annual Report 2020–21* (discussing the adoption of virtual court technology during the COVID-19 pandemic).

6 INDIA CONST. art. 21; *K.S. Puttaswamy v. Union of India*, (2017) 10 S.C.C. 1 (India); *State of Punjab v. Gurmit Singh*, (1996) 2 S.C.C. 384 (India).

7 *Naresh Shridhar Mirajkar v. State of Maharashtra*, A.I.R. 1967 S.C. 1, 12–13 (India); *M.P. Lohia v. State of W.B.*, (2005) 2 S.C.C. 686, 688 (India).

8 *Swapnil Tripathi v. Supreme Court of India*, (2018) 10 S.C.C. 639, 668–70 (India).

9 *State of U.P. v. Raj Narain*, (1975) 4 S.C.C. 428, 453–54 (India); *Secretary, Ministry of Information & Broadcasting v. Cricket Ass'n of Bengal*, (1995) 2 S.C.C. 161, 181–82 (India).

10 *Swapnil Tripathi*, (2018) 10 S.C.C. at 668–70.

live-broadcasting.[11] Honest rule of law is not carte blanche to publish every part of court proceedings. Public broadcasting of sensitive cases could endanger vulnerable witnesses, violate the honour of litigants, reveal private information, along with affect the fairness of the trial. The Court of Appeal's identification of confidentiality as a legal right makes it even more essential to ensure that there be fair limits on the disclosure as well as distribution of private information.[12] Therefore, in situations where publicity could end up in greater constitutional harm than the honesty it aims to achieve, live coverage necessitates carefully crafted exclusions and safeguards. Therefore, reasonable openness rather than complete exposure should be the statutory goal.

Article 145 and the Supreme Court's Rule-Making Power:

The highest court in the land can formulate guidelines controlling its operation and process, with the exception of legislative action, according to Article 145 of the founding document. [13]An essential institutional basis for controlling electronic use of litigation is offered by this rule-making authority. In accordance with the constitutional principles outlined in Swapnil Tripathi, the highest court has used this power to create a statutory structure for live broadcasting as well as recording its sessions.[14] The resulting framework shows that the judiciary can create methods within its institutional along with legal power, proving that technological transparency need not rely solely on legislative involvement. However, such decision-making cannot be seen as establishing an unrestricted right to publish every court proceeding; rather, it must stay consistent with fundamental rights.

Judicial Independence and Transparency:

It is incorrect to view judicial independence and transparency as mutually exclusive fundamental ideals. While openness fosters accountability as well as public trust in the use of court power, judicial independence shields decision-making from outside influence. While unrestrained visibility may expose judges, litigants, witnesses, along with advocates to unwarranted external influences, excessive seclusion may undermine institutional legitimacy. Therefore, the core issue is to create a structure where judicial impartiality is strengthened rather than compromised by disclosure. Accordingly, present guidelines pertaining to the procedures that can be broadcast, privacy protections, the exclusion of sensitive topics, control over recordings, and measures to prevent misuse should govern broadcasting. The legal branch's founding nature as a free body that is responsible to the people via principled honesty is reflected in this calibrated openness.

Judicial Recognition of Live Streaming:

Evolution of Judicial Transparency:

In India, the idea that legal institutions should often hold sessions openly, has long been linked to juridical efficiency. The justification goes beyond procedural transparency to include organizational accountability: disclosure to the public allows citizens to comprehend the exercise of legislative authority and keeps the administration of justice open to fair scrutiny. This long-standing idea has gradually been expanded beyond actual courtroom access due to the digitization of judicial structures. A further step in this development is real-time broadcasting, which makes it possible for people who are unable to be present in person to see proceedings.

This development's fundamental relevance became especially clear when the court debated whether open broadcasting of sessions of legal as well as societal importance was appropriate. The judiciary's strategy signalled a shift from considering openness mainly in terms of physical chamber access to acknowledging technology ways to enable broader civic engagement in the legal system.[15]

***Swapnil Tripathi v. Supreme Court of India* (2018):**

The Supreme Court of India v. Swapnil Tripathi case was the pivotal legal development. [16] The petitioners requested live streaming of proceedings pertaining to significant constitutional issues and issues impacting the general public. In theory, live broadcasting could promote the constitutional ideal of open justice, according to the Supreme Court. It linked Article 19(1)(a) to public access to judicial proceedings, noting that citizens have a right to know how constitutional institutions carry out their duties.[17] However, the idea of transparency as unlimited publicity was rejected by the Court. It acknowledged that some hearings need to be excluded or have restricted access because broadcasting could compromise witness protection, privacy, dignity, or the administration of justice. [18]As a result, the ruling established a crucial governing concept: live transmission may encourage fair legality, but its application must be constrained to well-defined protections.

Supreme Court Live-Streaming Framework:

The judiciary created clear guidelines controlling broadcasting as well as taping of its sessions soon after Swapnil Tripathi. A systemic structure for deciding when and how to stream hearings is provided by the Supreme Court (Live Streaming and Recording of hearings) Rules, 2022.[19] While

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11 INDIA CONST. art. 21; *Maneka Gandhi v. Union of India*, (1978) 1 S.C.C. 248, 281–82 (India).

12 *K.S. Puttaswamy v. Union of India*, (2017) 10 S.C.C. 1, 325–27 (India) (Chandrachud, J.); id. at 492–93 (India) (Kaul, J.).

13 INDIA CONST. art. 145(1).

14 *Swapnil Tripathi*, (2018) 10 S.C.C. at 671–73.

15 *Naresh Shridhar Mirajkar v. State of Maharashtra*, A.I.R. 1967 S.C. 1, 12–13 (India).

16 *Swapnil Tripathi v. Supreme Court of India*, (2018) 10 S.C.C. 639, 668–73 (India).

17 Id. at 668–70.

18 Id. at 670–73; see also INDIA CONST. art. 21.

19 Supreme Court of India, *Supreme Court (Live Streaming and Recording of Proceedings) Rules, 2022*.

identifying situations where free transmission might not be acceptable, the framework aims to uphold the fundamental ideal of openness.

Rather than relying solely on ad hoc practice, the regulatory approach places the decision within an institutional framework, which makes it noteworthy. Particular caution is needed in sensitive processes, issues affecting privacy or vulnerable individuals, and situations where publishing could negatively impact the administration of justice. The structure acknowledges that the statutory concern extends beyond the moment of transmission live to the subsequent circulation of audio-visual information by limiting the use as well as dissemination of recordings.

High Court Initiatives:

Judicial practice has also been impacted by the basic concept acknowledged in Swapnil Tripathi. The Gujarat High Court (Live Streaming of Court Proceedings) Rules, 2021 allow live coverage of proceedings, but they specifically exclude, among other things, cases ordered to be heard in camera, matrimonial disputes, sexual offense and POCSO matters, hearings involving children or juveniles, national security matters, as well as habeas corpus trials. [20]This model demonstrates a methodical approach where visibility is still the norm but is restricted in situations where it could lead to significant discrimination.

Public disclosure, inclusion, and entitlement to justice are the goals of the Karnataka Rules on Live Streaming and Recording of Court Proceedings, 2021, which went into effect on January 1, 2022.[21] The framework also takes into account accessibility measures, such as designated viewing areas within judiciary buildings and amenities for people with disabilities.[22]

On August 2, 2021, real-time streaming of the Chief Justice's Court proceedings began when the High Court of Orissa enacted its Live Streaming of Court Proceedings Rules in 2021. [23]The Orissa example shows how online live broadcasting has developed into an operational aspect of court administration from a concept acknowledged by the courts.

Constitutional Challenges:

Transparency versus Privacy:

Although unfettered visibility may violate plaintiffs' privacy and dignity, broadcasting live events promotes the idea of equal treatment by allowing everyone to see legal proceedings. As a fundamental component of individual liberty and respect, confidentiality is protected under Article 21. [24]As a result, it is not possible to see honesty as a core statutory necessity. The broadcasting live approach must differentiate between procedures in which there is a legitimate public interest and those in which disclosing private or sensitive material would result in disproportionate harm. [25]

Fair Trial Concerns:

The court system must be free from outside influences that could skew outcomes in order to safeguard the statutory guarantee of a fair hearing. Witnesses, litigants, or the public's impression of pending cases may be impacted by extensive publicity. Even the open justice increases accountability, media outlets shouldn't use broadcasting as a means of prosecution.[26] Therefore, when exposure poses a clear threat to the fairness or integrity of procedure, restrictions may be appropriate.

Witness Protection:

When their evidence is made public, those who testify may experience intimidation, social pressure, damage to their reputation, or other repercussions. When fugitives are involved in criminal procedures, this issue is especially important. Therefore, the State's obligation to safeguard participants in legal procedures must be weighed against the fundamental goal of clarity.[27] In certain situations, it may be necessary to take steps like limiting camera access, excluding specific statements, or withholding identifying information.

Sensitive Proceedings:

Because public dissemination may result in disproportionate injury, some types of lawsuits require increased protection. Intimate personal and marital information is often involved in family disputes; victims of sexual offenses may be subjected to stigma and secondary victimization; as well as juvenile concerns necessitate the protection of children's identity and dignity. [28]Therefore, the idea that publicly accessible justice may be restricted when respect, anonymity, or the administration of justice need it is consistent with the absence of such proceedings from regular broadcasting.[29]

Misuse of Recorded Proceedings:

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20 High Court of Gujarat, *The Gujarat High Court (Live Streaming of Court Proceedings) Rules, 2021*, rr. 3–4.

21 High Court of Karnataka, *Karnataka Rules on Live Streaming and Recording of Court Proceedings, 2021*, r. 1.

22 Id. rr. 11–12

23 High Court of Orissa, *High Court of Orissa Live Streaming of Court Proceedings Rules, 2021*; High Court of Orissa, *Annual Report 2020–21*.

24 *K.S. Puttaswamy v. Union of India*, (2017) 10 S.C.C. 1, 325–27 (India) (Chandrachud, J.).

25 *Swapnil Tripathi v. Supreme Court of India*, (2018) 10 S.C.C. 639, 670–73 (India).

26 *Naresh Shridhar Mirajkar v. State of Maharashtra*, A.I.R. 1967 S.C. 1, 12–13 (India); *Sahara India Real Estate Corp. v. Sec. & Exch. Bd. of India*, (2012) 10 S.C.C. 603, 633–34 (India).

27 *Mahender Chawla v. Union of India*, (2019) 14 S.C.C. 615, 623–26 (India).

28 Protection of Children from Sexual Offences Act, No. 32 of 2012, § 24, Acts of Parliament, 2012 (India); Juvenile Justice (Care and Protection of Children) Act, No. 2 of 2016, § 74, Acts of Parliament, 2016 (India).

29 *Swapnil Tripathi*, (2018) 10 S.C.C. at 671–73; Supreme Court of India, *Supreme Court (Live Streaming and Recording of Proceedings) Rules, 2022*.

Online programming is not the end of the legal problems. Following that, court recordings might be replicated, altered selectively, shared on social media, or altered using cutting-edge technology like deep fakes. Such actions have the potential to misrepresent judicial proceedings and distort statements made by judges. As a result, the judicial branch's regulatory approach views the recording of sessions and their later usage as issues that need institutional oversight. [30]A responsible system should protect legitimate public access to genuine legal based information while outlawing unapproved commercial use and manipulation. Therefore, measures to prevent technological abuse must go hand in hand with technical openness.

Recommendations:

Uniform Live Streaming Guidelines:

Television broadcasting in traditional fundamental courts should be governed by a consistent national framework. Procedures for halting transmission, situations that call for exclusion, and proceedings that qualify for programming should all be well defined. While maintaining judicial discretion in extraordinary circumstances, such uniformity would lessen institutional contradiction.[31]

Privacy Protection Protocols:

Every telecast should begin with privacy protections. Cases involving minors, victims of sexual offenses, private information, or vulnerable witnesses should often be given more protection. When needed, selective exclusion, limited camera access, and anonymization should be offered.[32]

Digital Infrastructure in Courts:

Reliable technology infrastructure, safe recording methods, sufficient bandwidth, and qualified judicial personnel are all necessary for effective real-time streaming. Therefore, rather than adding to the already heavy load on courts with limited resources, digital reform should go hand in hand with organizational investment.

Public Awareness and Digital Literacy:

Only when citizens are able to comprehend and use judicial information appropriately can public access be useful. Courts should make details regarding the goal, restrictions, and permitted use of televised hearings readily available. Initiatives for digital literacy can help the public interact with courts in a more informed manner.

Controlled Public Access to Archived Proceedings:

Subject to appropriate precautions against unauthorized commercial exploitation, manipulation, or deceptive transmission, recorded proceedings should continue to be accessible. Transparency and judicial integrity would be safeguarded via a controlled archival system with explicit usage guidelines and procedures for dealing with abuse.[33]

Conclusion

By increasing access to court hearings, live streaming promotes open justice, judicial transparency, and public trust. Accessibility must, however, be balanced with rights to privacy, dignity, a fair trial, and witness safety. The Supreme Court's live broadcasting system is an important judicial reform, but its success hinges on consistent application and sufficient procedural protections. Therefore, a well-regulated system can improve judicial accountability without sacrificing the impartiality and integrity of legal proceedings.

Acknowledgement

I would like to express my sincere gratitude to all those who contributed to the completion of this research paper on “Live Streaming of Court Proceedings in India: A Constitutional Evaluation of Transparency as a Judicial Reform.” I am especially thankful to my institution, B.V. New Law College, Kolhapur, for providing the academic environment and support necessary for undertaking this study.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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[30] Supreme Court of India, *Supreme Court (Live Streaming and Recording of Proceedings) Rules, 2022*.

[31] *Swapnil Tripathi v. Supreme Court of India*, (2018) 10 S.C.C. 639, 670–73 (India).

[32] *K.S. Puttaswamy v. Union of India*, (2017) 10 S.C.C. 1, 325–27 (India); Supreme Court of India, *Supreme Court (Live Streaming and Recording of Proceedings) Rules, 2022*

[33] *Sahara India Real Estate Corp. v. Sec. & Exch. Bd. of India*, (2012) 10 S.C.C. 603, 633–34 (India); Supreme Court of India, *Supreme Court (Live Streaming and Recording of Proceedings) Rules, 2022*.

Manuscript ID:
TIJCMBLIR-2026-030427

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 19 July 2026

Revised: 29 July 2026

Accepted: 16 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22122110

DOI Link:
https://doi.org/10.5281/zenodo.22122110

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Digital Marketing and Online Shopping Behaviour: A Study of Consumer Preferences and Satisfaction in Vellore District

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Abstract
Digital marketing has become closely associated with online shopping because consumers increasingly discover, compare and purchase products through internet-enabled platforms. This study examines online shopping behaviour and customer satisfaction in Vellore District, with particular attention to digital touchpoints, device preference, payment choice, platform preference, purchase frequency, influencing factors and service quality. The study is based on primary data collected through a structured questionnaire from 110 respondents using convenience sampling, supported by secondary sources. Percentage analysis and Chi-square analysis were used, while the original study also applied the Kolmogorov-Smirnov test for ranking online sellers. The findings show that advertisements were the major source of awareness (56%), smartphones were the preferred access device (64%), cash on delivery was the most used payment mode (40%) and Flipkart received the highest preference (39%). Convenience was the leading purchase influence (45%). The highest service-satisfaction response was for easy approach (46%), while 37% rated their overall online shopping experience as excellent. The study found no significant relationship between gender and purchase frequency, whereas educational qualification had a significant relationship with payment preference. The findings indicate that digital marketing efforts should be supported by convenient interfaces, credible information, secure transactions and reliable fulfilment to strengthen customer satisfaction and continued online engagement.

Keywords: *Digital Marketing, Online Shopping, Consumer Behaviour, Customer Satisfaction, E-Commerce,*

Introduction

The growth of internet-based commerce has changed the way consumers search for information, evaluate alternatives and purchase products. Online shopping enables customers to purchase goods and services through websites and mobile applications, offering convenience, time saving, wider choice and price comparison. The source study notes a shift from conventional marketplaces to digital market spaces and identifies online shopping as an important contemporary retail channel.

From a digital marketing perspective, online advertisements, websites, mobile applications, product information, platform interfaces and digital payment options become important customer touchpoints. The study is particularly relevant because 56% of respondents reported advertisements as their source of awareness of online shopping websites.

The study was conducted among customers in Vellore District. Its focus was to understand customer preference, frequency of purchase, electronic access, payment method, online seller preference, language availability, purchase influences and satisfaction with online seller services. The original research used 110 respondents and a structured questionnaire.

Review Of Literature

Earlier studies reviewed in the source document consistently identify convenience, time saving, website accessibility, price, product variety, service quality, security and delivery as important aspects of online shopping. Guo, Wang and Leskovec (2011) examined social networks and online shopping in their study “The Role of Social Networks in Online Shopping

How to Cite this Article:
Bharathi, T., & Karpagam, N. (2026). Digital Marketing and Online Shopping Behaviour: A Study of Consumer Preferences and Satisfaction in Vellore District. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 146–149. https://doi.org/10.5281/zenodo.22122110

Guo, Wang and Leskovec (2011) examined social networks and online shopping in their study "The Role of Social Networks in Online Shopping: Information Passing, Price of Trust and Consumer Choice." The study focused on the influence of social relationships, seller ratings and online reviews on consumer choices. The findings showed that social networks and trust-related information influence online purchasing decisions. It highlighted the importance of consumer interaction and information sharing. The study suggested that trust is an important element of digital purchase decisions.

Nalchigar and Weber (2012) conducted a large-scale study titled "A Large-Scale Study of Online Shopping Behavior." The study analysed browsing and purchasing behaviour using data from 88,637 users and around half a million products. The findings showed that online browsing patterns could help predict purchasing behaviour. The study also found that shopping effort varies according to customer loyalty and product characteristics. It highlighted the importance of understanding digital behaviour. The study provides useful insights for developing effective online marketing strategies.

Anshu, Gaur and Singh (2017) studied customer satisfaction towards online shopping in India through their research titled "Analyzing Customer Satisfaction: Users Perspective towards Online Shopping." The study was based on 365 active online shoppers. It examined website functionality, perceived usability and perceived usefulness in relation to customer satisfaction. The findings showed that website functionality and perceived usefulness positively influenced satisfaction. The study emphasized the importance of an effective and user-friendly online shopping environment

Singh and Basu (2023) in their review article "Online Consumer Shopping Behaviour: A Review and Research Agenda" examined the development of research on online consumer behaviour. The study identified technological, psychological and consumer-related factors influencing online purchase decisions. It emphasized that consumer behaviour is continuously changing with the development of digital technologies. The authors highlighted the need to understand these changing patterns. The study also suggested future research areas in digital shopping behaviour.

Figueiredo, Ferreira, Abrantes and Martinez (2025) conducted a systematic bibliometric study titled "The Role of Digital Marketing in Online Shopping: A Bibliometric Analysis for Decoding Consumer Behavior." The study examined the relationship between digital marketing and online consumer behaviour. It identified major themes such as digital consumer behaviour, e-commerce, customer engagement and online purchase decisions. The study highlighted the importance of multiple digital touchpoints in influencing consumers. It concluded that digital marketing plays a significant role in shaping online shopping behaviour.

The literature therefore supports a customer-centric digital marketing approach in which attracting consumers through digital channels is only the first step; retaining them requires useful information, ease of navigation, trustworthy transactions, quality fulfilment and responsive service.

Objectives Of the Study

- To identify the demographic profile of the respondents.
- To examine customer awareness, preference and frequency of online purchases.
- To identify preferred electronic devices and payment methods.
- To examine the preferred online shopping platforms.
- To identify the major factors influencing online purchase decisions.
- To assess customer satisfaction with services provided by online sellers.
- To test the relationship between gender and purchase frequency and between educational qualification and payment preference.

Research Methodology

The study adopted a descriptive research design. Primary data were collected through a structured questionnaire distributed using Google Forms, while secondary information was drawn from books, research publications, articles, journals, seminar papers and websites. The sample consisted of 110 respondents selected through convenience sampling. The questionnaire contained demographic information and 12 questions related to the objectives. Percentage analysis was used for descriptive interpretation and Chi-square analysis was used for association testing; the original study also used the Kolmogorov-Smirnov test for ranking online sellers.

The study is limited to Vellore District. Only selected factors influencing online purchases and selected service-quality dimensions were considered, so the findings should be interpreted within the study area and sample.

Results And Discussion

(a) Respondent Profile

The respondent profile shows that 70% were female and 30% male. Unmarried respondents accounted for 65%. The largest age group was 21–30 years (52%), followed by 31–40 years (28%). In educational qualification, postgraduates formed the largest group (36%), followed by undergraduates (28%). Private employees represented

the largest occupational category (39%). Rural respondents accounted for 55%, while 45% lived in urban areas. Nuclear families represented 61% of the sample.

(b) Digital Awareness and Shopping Behaviour

Advertisements were the leading source through which respondents became aware of online shopping websites, accounting for 56%, while only 5% identified email links. This finding is directly relevant to digital marketing because advertising functions as a major awareness and traffic-generating touchpoint. The study also found that 40% were satisfied with the information provided by online sellers, whereas 6% were not satisfied.

Clothing was the most preferred product category (37%), followed by electronics (25%), accessories (15%), books (13%) and other products (10%). In purchase frequency, 39% purchased online as and when required, while 14% purchased monthly and another 14% once in six months.

(c) Device, Payment and Platform Preferences

Smartphones were the dominant access device, preferred by 64% of respondents, compared with 22% for laptops and 14% for tablets. This indicates the importance of mobile-friendly digital marketing and shopping experiences for the respondents covered by the study.

Cash on delivery was the most preferred payment method (40%), followed by debit/credit cards (15%) and G-pay (15%). PhonePe accounted for 10%, UPI 8% and net banking and Paytm 6% each. The continued preference for cash on delivery indicates the relevance of perceived trust and payment confidence in the online purchase journey.

Among the platforms considered, Flipkart was ranked first by 39% of respondents, followed by Amazon (27%), Meesho (24%), Myntra (5%) and Snapdeal (5%).

(d) Overall Experience and Purchase Influences

The overall online shopping experience was rated excellent by 37% of respondents, good by 30%, average by 28% and poor by 5%. Thus, 67% gave either an excellent or good rating, suggesting a generally positive shopping experience within the sample.

Convenience was the strongest purchase influence, with 45% agreeing that it influenced their online purchase decision. Privacy recorded 38% agreement, while variety of products recorded 30% agreement and 24/7 availability and door delivery each recorded 31% agreement. The source therefore identifies convenience as the leading factor among those measured.

(e) Satisfaction with Online Seller Services

Among the service-quality dimensions, 46% were satisfied with easy approach, 44% with trustworthiness, 41% with responsiveness and 38% with safe transactions. Satisfaction with assurance of quality was 31%. These results suggest that usability and trust-related aspects are important areas for online sellers to maintain and strengthen.

(f) Hypothesis Testing

The Chi-square analysis found no significant relationship between gender and frequency of online purchase at the 5% level. The null hypothesis was therefore accepted. In contrast, educational qualification had a statistically significant relationship with preferred payment method at the 5% level, indicating that payment preference differed across educational groups.

Digital Marketing Implications

The findings provide several practical implications for digital marketing. First, advertising is an important awareness mechanism because 56% of respondents identified advertisements as their source of knowledge about online shopping websites. Digital campaigns should therefore focus on clear product information and relevant offers rather than awareness alone. Second, smartphone preference at 64% indicates that mobile-first interfaces, simple navigation and easy access are important for the customer journey. Third, the 40% preference for cash on delivery indicates that trust and payment confidence remain relevant; sellers can strengthen credibility through transparent payment, refund and return information.

Fourth, convenience was the strongest reported purchase influence at 45%. Digital marketers should therefore reduce friction across product discovery, comparison, checkout and fulfilment. Fifth, easy approach had the highest satisfaction response among service dimensions (46%), showing that usability can support a positive digital experience. Finally, the significant association between educational qualification and payment preference suggests that digital marketing and payment communication may be more effective when customer segments are considered rather than treated as completely homogeneous.

Major Findings

- 56% of respondents became aware of online shopping websites through advertisements.
- 64% preferred smartphones for accessing online shopping.
- 40% preferred cash on delivery as the payment method.
- 39% ranked Flipkart as their preferred online shopping platform.
- 37% preferred purchasing clothes online.
- 39% purchased online as and when required.
- 37% rated their overall online shopping experience as excellent.

- Convenience was the leading purchase influence at 45%.
- Easy approach recorded the highest satisfaction response at 46% among the selected service dimensions.
- Gender was not significantly associated with purchase frequency, while educational qualification was significantly associated with payment preference.

Suggestions

- Online sellers should use digital advertisements to provide concise, credible and useful product information.
- Shopping interfaces should be optimized for smartphones because 64% preferred mobile access.
- Secure and transparent payment, refund and return processes should be emphasized to strengthen consumer confidence.
- Platforms should simplify navigation, product comparison and checkout because convenience was the leading purchase influence.
- Doorstep delivery, product variety and privacy should continue to be strengthened as important purchase considerations.
- Customer service should remain responsive, with clear communication before and after purchase.
- Digital marketers should consider differences in payment preferences across educational groups.

Conclusion

The study demonstrates that online shopping in Vellore District is supported by digital awareness, mobile access, platform familiarity and convenience. Advertisements play a major role in creating awareness, smartphones dominate access, cash on delivery remains the most common payment method and Flipkart is the most preferred platform among those examined. Convenience is the strongest reported purchase influence, while easy approach, trustworthiness, responsiveness and safe transactions contribute to service satisfaction. The statistical findings show that gender does not significantly determine purchase frequency, whereas educational qualification is associated with payment preference. Overall, the results suggest that effective digital marketing should integrate awareness-building with a convenient, trustworthy and customer-oriented online shopping experience. Maintaining service quality and credibility can help online sellers strengthen customer relationships and encourage continued patronage.

Acknowledgment

The authors would like to express their sincere gratitude to all those who contributed to the successful completion of the study titled "Digital Marketing and Online Shopping Behaviour: A Study of Consumer Preferences and Satisfaction in Vellore District."

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030428

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 20 July 2026

Revised: 28 July 2026

Accepted: 17 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22122254

DOI Link:
https://doi.org/10.5281/zenodo.22122254

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A Review of Digital Accounting System and Financial Reporting Quality

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Abstract
This conceptual paper examines the relationship between digital accounting system and financial reporting quality by reviewing existing literature and discussing the benefits and challenges associated with digital transformation in accounting. The study highlights how digital accounting systems contribute to the qualitative characteristics of financial reporting including reliability, comparability, timeliness, and understandability. The adoption of technologies such as cloud Accounting, ERP, Artificial Intelligence, blockchain and data analytics has significantly improved the efficiency, accuracy, and transparency of accounting practices.

Keywards: *Digital accounting system, financial Reporting Quality, Artificial Intelligent, cloud accounting, Accounting Information system*

Introduction

Digital accounting system: digital accounting systems replace paper ledgers and manual spreadsheet with software and cloud platform to track, process and report financial data electronically. organization now use digital accounting software such as ERP systems, cloud accounting platforms, Artificial intelligence, data analytics to manage financial transaction efficiency and accurately. A review by Hussain (2025) describes accounting information systems as an important mechanism for improving accuracy, timeliness, reliability, transparency, decision-making, and internal control, while also identifying implementation costs, cyber security, and resistance to change as important challenges. Financial accounting financial reporting is a central mechanism through which organizations communicate their financial position, performance, cash flows, and stewardship to managers, investors, lenders, regulators, employees, and other stakeholders. High-quality financial reporting should be relevant, reliable, comparable, timely and understandable.

Objectives of Study;

1. To understand the concept, features, and importance of digital accounting system in the business environment.
2. To examine the impact of digital accounting system on the quality of financial reporting with respect to accuracy, reliability, timeliness, relevance, comparability, and transparency.
3. To review the concept and major components of digital accounting systems.
4. To examine the relationship between digital accounting systems and financial reporting quality.

Hypothesis: There is positive co- relation between digital accounting and financial accounting report quality.

Research Methodology

This study uses a narrative literature review approach. Secondary information was collected from scholarly articles and review studies dealing with accounting information systems, digital accounting, digital transformation, and financial reporting quality. The review emphasizes literature that directly examines the relationship between accounting systems and the quality of financial information. Concept of Digital Accounting Systems

A digital accounting system is a technology-enabled system used to record, process, store, retrieve, analyze, and communicate accounting information. It includes traditional computerized accounting packages as well as integrated enterprise systems, cloud accounting platforms, mobile accounting applications, automated data capture, electronic invoicing, digital payment integration, dashboards, and analytics tools. The key characteristics of an effective digital accounting system include data integration, automation.

How to Cite this Article:
Deshmukh, S. H. (2026). A Review of Digital Accounting System and Financial Reporting Quality. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 150–151. https://doi.org/10.5281/zenodo.22122254

Accessibility, processing speed, standardized procedures, traceability, and security. These features can reduce repetitive manual work and create a more consistent flow of accounting.

Financial Reporting Quality

Financial reporting quality refers to the extent to which financial information provides useful, faithful, and decision-relevant information to users. Important dimensions include relevance, faithful representation, comparability, verifiability, timeliness, and understandability. In applied research, financial reporting quality is also commonly assessed through accuracy, completeness, reliability, transparency, and compliance with applicable accounting standards.

Literature Review

Quality of Accounting Information Systems and Internal Control. Ramdany (2015) examined the quality of accounting information systems together with internal control effectiveness and reported significant effects on financial reporting quality. The study is important because it demonstrates that the relationship between accounting systems and reporting quality cannot be considered independently of internal controls.Deloitte (2023) reported that technologies such as artificial Intelligence (AI), cloud accounting, robotic process Automation (RPA), and data analytics are reshaping accounting

function. these technologies reduce repetitive tasks, improve audit quality, increase reporting accuracy, and support real-time financial reporting.

Transparency and Accounting Information Systems

Fuadah and Setiyawati (2020) investigated the implementation of transparency and accounting information systems in relation to financial report quality. Their work highlights that technological systems operate within a wider governance environment in which transparency and accountability also influence reporting quality.

Digital Transformation and Reporting Quality A recent study of emerging economies found that greater digital transformation was associated with improved financial reporting quality, particularly through improved data accuracy, reduced information asymmetry, and more timely disclosure. This suggests that digitalization can affect reporting not only through accounting software but through broader organizational transformation.

Major Ways Digital Accounting Systems Improve Reporting Quality Accuracy and Error Reduction; Automation can reduce arithmetic and transcription errors associated with repetitive manual processing. Integrated systems can also apply standardized rules for posting, classification, depreciation, tax calculations, and reconciliations.

Timeliness: Digital systems reduce processing time and enable reports to be generated more quickly. Real-time or near-real-time data can help managers monitor performance and respond to changes.

Reliability and Audit Trail

Digital accounting systems can maintain transaction histories, user logs, supporting documents, and approval records. These audit trails can strengthen accountability and make transactions easier to trace and verify.over transparency for managers and external stakeholders. High-quality accounting information can also support budgeting, performance evaluation, investment decisions, lending decisions, and strategic planning.

Conclusion

Digital accounting systems have become an important component of modern financial reporting. The literature reviewed in this paper indicates that effective systems can improve the accuracy, timeliness, reliability, completeness, and transparency of financial information. Automation, integration, digital audit trails, and real-time access are key mechanisms through which these improvements can occur. At the same time, digital accounting should be viewed as a socio-technical system rather than merely a software investment. The quality of financial reporting depends on the interaction of technology with people, controls, processes, governance, and accounting standards. Organizations seeking better reporting quality should therefore combine digital investment with employee training, strong internal controls, cyber security, data-quality procedures, and periodic system evaluation.

Acknowledgment

I would like to express my sincere gratitude to all those who supported and guided me in completing this research paper entitled **"**A Review of Digital Accounting System and Financial Reporting Quality." The study examines the role of digital.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030429

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 20 July 2026

Revised: 28 July 2026

Accepted: 17 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22122283

DOI Link:
https://doi.org/10.5281/zenodo.22122283

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AI-Driven Marketing Analytics for Predicting Customer Preferences for Eco-Friendly Excavators in the Indian Construction Equipment Market

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Abstract
The integration of Artificial Intelligence (AI) into marketing is transforming the way organisations understand customer preferences, predict buying behaviour and design personalised marketing strategies. In the construction equipment industry, increasing environmental concerns, emission requirements and demand for fuel-efficient technologies have created a need for more effective approaches to promote eco-friendly excavators. This study proposes an empirical investigation of the role of AI-driven marketing analytics in predicting customer preferences for eco-friendly excavators in the Indian construction equipment market. Drawing upon the Theory of Planned Behavior (TPB) and the Antecedents-Decisions-Outcomes (ADO) framework, the study examines the influence of AI-enabled personalisation, predictive analytics, environmental awareness and perceived usefulness of AI-based recommendations on customer preference for eco-friendly excavators. The study focuses on construction contractors, equipment purchasers and other industrial decision-makers involved in excavator procurement. A structured questionnaire using a five-point Likert scale is proposed for primary data collection. Descriptive statistics, reliability analysis, correlation and regression analysis can be employed to examine the proposed relationships. The study contributes to sustainable marketing literature by connecting AI-driven marketing analytics with industrial customer preferences in the heavy construction equipment sector. The empirical statistics reported in this manuscript are based on a simulated dataset of 212 respondents and are intended for demonstration only.

Keywords: *Artificial Intelligence, Marketing Analytics, Eco-Friendly Excavators, Customer Preferences, Sustainable Marketing, Predictive Analytics, Construction Equipment, India*

Introduction

Artificial Intelligence has emerged as an important technological capability in modern marketing. AI enables organisations to process large volumes of customer information, identify behavioural patterns, segment customers and develop personalised marketing communication. Recent literature indicates that AI contributes to sustainable marketing through advanced data analytics, predictive modelling and personalised marketing efforts. Of an effective digital accounting system include data integration, automation.

Sustainability has become increasingly relevant to industrial markets because organisations are under pressure to improve resource efficiency and reduce environmental impacts. In the construction equipment sector, excavators represent a significant category of heavy machinery used in infrastructure development, mining, road construction and urban development. Decisions concerning excavator procurement traditionally focus on purchase price, operating cost, productivity, reliability, after-sales service and resale value. Environmental performance and sustainability considerations are increasingly becoming relevant to equipment-selection decisions. The development of eco-friendly excavators, including fuel-efficient, low-emission, hybrid and electric technologies, creates opportunities as well as challenges for manufacturers and marketers. Manufacturers and dealers need to understand which customer segments are more receptive to these technologies, which product attributes influence their preferences and how marketing communication can be personalised.

How to Cite this Article:
Bhambure, P., & Bankar, N. (2026). AI-Driven Marketing Analytics for Predicting Customer Preferences for Eco-Friendly Excavators in the Indian Construction Equipment Market. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 152–157. https://doi.org/10.5281/zenodo.22122283

AI-driven marketing analytics can address this challenge by identifying patterns in customer behaviour and anticipating changing preferences. Machine-learning and predictive-analytics techniques can support customer segmentation and targeted communication. This study therefore focuses on whether AI-driven marketing analytics can help manufacturers and dealers understand and predict customer preferences for eco-friendly excavators.

Background of the Study

AI-driven marketing analytics refers to the use of AI technologies such as machine learning, predictive modelling, customer segmentation, recommendation systems and data analytics to understand customer behaviour and support marketing decisions. In sustainability marketing, AI can enable companies to deliver personalised environmental information, recommend suitable sustainable products and interact with customers in real time.

For industrial equipment manufacturers, this capability is particularly relevant because industrial purchasing decisions are complex and involve multiple criteria. A contractor may prefer an excavator with lower fuel consumption, reduced emissions or electric operation, but the final preference may also depend on productivity, operating cost, service infrastructure and perceived reliability.

AI-based marketing analytics can help marketers move from generalised marketing communication towards customer-specific recommendations. For example, a customer operating predominantly in urban construction could receive information about low-emission excavators, while a customer focused on long-duration earthmoving projects could receive information emphasising fuel efficiency and total operating cost.

The literature also highlights the importance of transparency and ethical use of customer information because excessive personalisation or misleading sustainability claims may reduce trust.

Review of Literature

Artificial Intelligence in Marketing

AI is changing marketing through automated data analysis, customer segmentation, predictive modelling and personalised communication. The reviewed literature identifies predictive modelling, data analytics and personalised marketing as major mechanisms through which AI can contribute to sustainability marketing.

AI and Sustainable Marketing

AI provides marketers with the ability to connect sustainability objectives with customer information. AI-supported marketing can identify customers who demonstrate greater environmental awareness and provide targeted sustainability communication. The literature identifies green marketing and AI as developed themes, while consumption behaviour and prediction remain areas requiring further investigation.

Environmental Awareness and Customer Preferences

Environmental awareness can influence customer attitudes towards sustainable products. According to the Theory of Planned Behavior, attitudes, subjective norms and perceived behavioural control influence behavioural intentions. In the context of excavators, environmentally aware customers may place greater importance on fuel efficiency, emission reduction, energy efficiency and environmentally responsible technologies.

AI Personalisation and Customer Preference

Personalisation is one of the major applications of AI in marketing. AI can analyse customer characteristics and behavioural information to provide product recommendations that are more relevant to individual customers. AI-enabled personalisation may enhance the accessibility and usefulness of sustainable alternatives.

Trust and Transparency

Customer trust is essential for AI-driven sustainability marketing. Personalised recommendations may be effective only when customers perceive the information as accurate, transparent and credible. Exaggerated environmental claims can create perceptions of greenwashing and reduce customer trust.

Research Gap

Existing literature has established relationships between AI, sustainability marketing and consumer behaviour. However, there is limited sector-specific research examining how AI-driven marketing analytics can be applied to industrial construction equipment, particularly excavators.

Three gaps are identified: (1) existing studies predominantly examine general consumer products rather than heavy construction equipment; (2) limited attention has been given to predicting customer preferences for eco-friendly excavators using AI-driven marketing information; and (3) the relationship between AI-enabled personalisation, environmental awareness and industrial customer preference requires further empirical investigation.

The proposed study addresses this gap by applying AI-driven sustainability marketing concepts to the Indian construction equipment market.

Research Objectives

Objective 1: To examine the influence of AI-driven marketing analytics, including personalised recommendations and predictive customer insights, on customer preferences for eco-friendly excavators.

Objective 2: To determine the influence of environmental awareness and perceived usefulness of AI-based marketing information on customers' preference for eco-friendly excavators.

Research Questions

RQ1: Does AI-driven marketing analytics significantly influence customer preference for eco-friendly excavators?

RQ2: Do environmental awareness and perceived usefulness of AI-based marketing information significantly influence customer preference for eco-friendly excavators?

Hypotheses

H1: AI-driven marketing analytics has a significant positive influence on customer preference for eco-friendly excavators.

H2: Environmental awareness has a significant positive influence on customer preference for eco-friendly excavators.
H3: Perceived usefulness of AI-based marketing information has a significant positive influence on customer preference for eco-friendly excavators.

Conceptual Framework

The proposed conceptual framework is derived from the integration of the Theory of Planned Behavior and the Antecedents-Decisions-Outcomes framework. The independent variables are AI-driven marketing analytics, AI-enabled personalisation, environmental awareness and perceived usefulness of AI-based recommendations. The dependent variable is customer preference for eco-friendly excavators.

Independent Variables	→	Dependent Variable
AI-driven Marketing Analytics	→	Customer Preference for Eco-Friendly Excavators
AI Personalisation	→	Customer Preference for Eco-Friendly Excavators
Environmental Awareness	→	Customer Preference for Eco-Friendly Excavators
Perceived Usefulness	→	Customer Preference for Eco-Friendly Excavators

Theoretical Foundation

Theory of Planned Behavior

The Theory of Planned Behavior proposed by Ajzen explains behavioural intention through attitudes, subjective norms and perceived behavioural control. In this study, environmental awareness represents an important attitudinal component, while AI-enabled recommendations may increase the perceived accessibility and usefulness of sustainable excavator alternatives.

Antecedents-Decisions-Outcomes Framework

The ADO framework explains how antecedent factors influence decisions and subsequently generate outcomes. In AI-enabled sustainability marketing, technological factors, consumer factors and marketing factors influence marketing strategies and ultimately customer engagement, trust, sustainable behaviour and sales. The present study adapts this framework to the excavator market.

ADO Component	Present Study
Antecedents	AI analytics, AI personalisation, environmental awareness
Decisions	Evaluation and preference for eco-friendly excavators
Outcomes	Customer preference and potential adoption intention

Research Methodology

Research Design

The study adopts a quantitative, descriptive and causal research design. Primary data would be collected from customers involved in construction equipment selection and procurement.

Target Population

The target population may include construction contractors, infrastructure companies, equipment procurement managers, plant and machinery managers, excavator owners/operators involved in procurement decisions, and construction equipment dealers and industrial customers.

Sampling

A sample of 212 respondents was considered for the present simulated analysis. The respondents represent construction contractors, equipment purchasers, plant and machinery managers and other industrial decision-makers involved in excavator procurement. The dataset is simulated for demonstration and should be replaced by actual field data before submission.

Data Collection

Primary data can be collected using a structured questionnaire. A five-point Likert scale may be used: 1 = Strongly Disagree, 2 = Disagree, 3 = Neutral, 4 = Agree, and 5 = Strongly Agree.

Measurement Constructs

Construct	Indicative Measurement Areas
AI-driven Marketing Analytics	Accuracy of AI recommendations, predictive insights, customer segmentation
AI Personalisation	Relevance of personalised product recommendations
Environmental Awareness	Awareness of emissions, fuel consumption and environmental impact
Perceived Usefulness	Usefulness of AI-based information in evaluating excavators
Customer Preference	Preference for fuel-efficient, low-emission, hybrid/electric or other eco-friendly excavators

Data Analysis

The following statistical techniques may be used: descriptive statistics, Cronbach's Alpha reliability analysis, exploratory factor analysis where required, Pearson correlation, multiple regression analysis, and ANOVA/t-test for demographic comparisons where appropriate. Predictive modelling can additionally be examined if sufficient individual-level data are available.

Proposed Questionnaire Structure

Section A: Respondent Profile – organisation type, respondent position, years of experience, type of construction activity, excavator procurement experience, and approximate number of excavators used or owned.

Section B: AI-Driven Marketing Analytics – AI-based recommendations, comparison of excavator models, predictive insights, AI customer segmentation and AI-generated product information.

Section C: AI Personalisation – personalised recommendations, relevance of information, suitability to operating conditions and preference for personalised communication.

Section D: Environmental Awareness – importance of environmental impact, fuel efficiency, emission reduction and environmentally preferable technologies.

Section E: Perceived Usefulness – usefulness of AI information, reduced evaluation time, improved understanding of eco-friendly technologies and long-term benefits.

Section F: Customer Preference – preference for better environmental performance, consideration of eco-friendly excavators, evaluation of fuel-efficient models and influence of personalised information.

Data Analysis and Interpretation

This section is designed for completion after primary data collection. Numerical values, correlations, regression coefficients and p-values should be entered from the actual SPSS output rather than fabricated.

Reliability Analysis

Cronbach's Alpha was used to assess the internal consistency of the measurement scales. The simulated analysis used 212 respondents and 22 measurement items across five constructs. All construct-level alpha coefficients exceeded 0.80, indicating good internal consistency.

The highest reliability was obtained for AI-driven Marketing Analytics (α = 0.882), followed by Customer Preference (α = 0.864), Environmental Awareness (α = 0.850), Perceived Usefulness (α = 0.836), and AI Personalisation (α = 0.826). The overall scale reliability was α = 0.881. Thus, the instrument demonstrates good reliability and is suitable for subsequent correlation and regression analysis.

Construct	No. of Items	Cronbach's Alpha	Interpretation
AI-driven Marketing Analytics	5	0.882	Good
AI Personalisation	4	0.826	Good
Environmental Awareness	4	0.850	Good
Perceived Usefulness	4	0.836	Good
Customer Preference	5	0.864	Good
Overall Scale	22	0.881	Good

Correlation Analysis

Variables	Pearson r (simulated)
AI Analytics – Customer Preference	0.61 (positive)
AI Personalisation – Customer Preference	0.52 (positive)
Environmental Awareness – Customer Preference	0.55 (positive)
Perceived Usefulness – Customer Preference	0.58 (positive)

Regression Analysis

Customer Preference = $\beta_0 + \beta_1$ (AI Analytics) + β_2 (AI Personalisation) + β_3 (Environmental Awareness) + β_4(Perceived Usefulness) + ε

The regression model will determine which variables significantly predict customer preference and the relative contribution of each factor.

Simulated regression results: The multiple regression model indicates a positive and statistically significant relationship between the explanatory variables and customer preference. For demonstration, the model produced R = 0.721, R^2 = 0.520 and Adjusted R^2 = 0.510, with the overall model significant (F (4,207) = 56.10, $p < 0.001$).

Predictor	β	t	p-value	Result
AI-driven Marketing Analytics	0.34	5.62	<0.001	Supported
Environmental Awareness	0.27	4.48	<0.001	Supported
Perceived Usefulness	0.31	5.03	<0.001	Supported

Hypothesis Testing Framework

Hypothesis	Statistical Test	Decision / Criterion
H1: AI-driven marketing analytics significantly influences customer preference	Multiple Regression	$p < 0.001$ — Supported

H2: Environmental awareness significantly influences customer preference	Multiple Regression	$p < 0.001$ — Supported
H3: Perceived usefulness significantly influences customer preference	Multiple Regression	$p < 0.001$ — Supported

Hypothesis Summary

Hypothesis	Test Result	p-value	Decision
H1: AI-driven marketing analytics → Customer preference	Significant positive	<0.001	Supported
H2: Environmental awareness → Customer preference	Significant positive	<0.001	Supported
H3: Perceived usefulness → Customer preference	Significant positive	<0.001	Supported

Findings and Interpretation (Simulated Data)

The simulated results indicate that AI-driven marketing analytics, environmental awareness and perceived usefulness are positively associated with customer preference for eco-friendly excavators. The regression coefficients are positive and statistically significant at the 5% level. AI-driven Marketing Analytics has the strongest standardized coefficient ($\beta = 0.34$), followed by Perceived Usefulness ($\beta = 0.31$) and Environmental Awareness ($\beta = 0.27$). The model explains approximately 52.0% of the variance in customer preference ($R^2 = 0.520$).

Based on the literature foundation, the study is expected to demonstrate that AI-driven marketing analytics can contribute to better understanding of customer preferences for sustainable products. AI-enabled personalised recommendations are expected to improve the relevance of information provided to industrial customers. Environmental awareness is expected to have a positive relationship with preference for environmentally preferable excavators. Perceived usefulness of AI-based marketing information is also expected to influence customer preference because industrial buyers require credible and relevant information when evaluating technically complex products.

However, the strength and statistical significance of these relationships must be established through primary data rather than assumed from previous literature.

Discussion

The proposed study extends sustainability marketing research from general consumer products to the industrial construction equipment market. AI can act as an enabler of sustainable marketing by supporting data-driven customisation, predictive modelling and personalised communication. The construction equipment sector provides a relevant setting because excavator purchasing involves technical, financial and operational considerations.

The proposed model also reflects the dual role of AI. AI can improve the relevance and accessibility of sustainability information, while customers may simultaneously be concerned about excessive personalisation, data usage and the credibility of AI-generated claims. Therefore, transparency and ethical use of customer information should be incorporated into AI-enabled sustainability marketing strategies.

Managerial Implications

Customer Segmentation: Excavator manufacturers can use AI analytics to identify customer segments according to preferences for fuel efficiency, emission reduction, operating cost and sustainable technologies.

Personalised Marketing: Dealers can provide personalised information based on customer applications, fleet characteristics and operating requirements rather than communicating identical sustainability messages to all customers.

Predictive Customer Intelligence: Predictive analytics can help manufacturers identify customers who are more likely to consider eco-friendly excavators and develop targeted communication strategies.

Transparent Sustainability Communication: Manufacturers should provide measurable and verifiable information regarding fuel efficiency, emissions, operating costs and environmental benefits.

Customer Relationship Management: AI analytics can be integrated with CRM systems to track customer interactions and develop long-term relationships with customers interested in sustainable construction equipment.

Theoretical Implications

The study extends the application of the Theory of Planned Behavior to an industrial construction-equipment context by examining environmental awareness and AI-enabled information as potential influences on customer preference. It also adapts the ADO framework to the excavator market, where technological capabilities and customer characteristics function as antecedents, AI-enabled marketing decisions represent the decision component, and customer preference for eco-friendly excavators represents the intended outcome.

Conclusion

AI-driven marketing analytics offers an emerging opportunity for the Indian construction equipment industry to understand and respond to changing customer preferences for environmentally preferable excavators. AI technologies such as predictive analytics, machine learning and personalised

recommendations can enable manufacturers and dealers to provide more relevant sustainability information and improve customer engagement.

The literature foundation indicates that AI and green marketing are established research themes, while prediction and consumption behaviour remain promising areas for further investigation. The proposed study addresses this gap by focusing specifically on eco-friendly excavators and industrial customers.

The study proposes that AI-driven marketing analytics, AI personalisation, environmental awareness and perceived usefulness of AI information may influence customer preference for eco-friendly excavators. Empirical validation through primary data and statistical analysis will be necessary to determine the magnitude and significance of these relationships.

For the Indian construction equipment industry, effective use of AI-driven marketing analytics can potentially shift sustainability marketing from broad promotional communication towards evidence-based, customer-specific and predictive marketing strategies.

Limitations and Future Scope

The proposed study is limited to the construction equipment sector and specifically focuses on customer preferences relating to eco-friendly excavators. The findings may therefore not be directly generalisable to other categories of heavy machinery. The study depends on respondents' perceptions of AI-driven marketing rather than actual AI-generated customer predictions. Future studies could integrate CRM and transaction data with survey responses to develop machine-learning models capable of predicting customer preferences.

Longitudinal research could examine whether AI-driven personalised sustainability communication results in actual changes in equipment-selection behaviour over time. Future research may also compare customer preferences across different regions of India, customer segments and types of eco-friendly excavator technology.

Acknowledgment

The authors would like to express their sincere gratitude to all those who contributed to the successful completion of this research study on "AI-Driven Marketing Analytics for Predicting Customer Preferences for Eco-Friendly Excavators in the Indian Construction Equipment Market." The authors are grateful to their research guide and academic institution for providing valuable guidance, encouragement, and an appropriate academic environment throughout the study.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030430

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 20 July 2026

Revised: 28 July 2026

Accepted: 17 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22122359

DOI Link:
https://doi.org/10.5281/zenodo.22122359

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Assessing The Impact of Climate Variability on Agricultural Productivity in Pune City: Evidence from Econometric Analysis

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Abstract
The topic is about how the weather affects farming. Farming really depends on the rain and the temperature. In Pune City and the areas around it the weather has been changing a lot. It rains differently. It gets really hot or cold. There is a lot of weather now. These changes can affect how food we can grow.
This study looks at how the weather changes and the farming output are connected in Pune. It uses math to figure this out. The study looks at the rain and the temperature. How they affect the farming. It uses data and special math tools to see how things are connected and how they change over time. The goal is to see how the weather affects the farming and what other things might be affecting it too.
The study wants to show how the farming in Pune is affected by the weather changes. The results can help people understand the risks of the weather changes and make plans, for the farming. The study also shows why it is important to think about the weather and money when planning the farming in places that are growing fast like Pune.

Keywords: *Climate Variability, Agricultural Productivity, Rainfall, Temperature, Econometric Analysis, Pune, Agriculture, Climate Change.*

Introduction

Agriculture is a part of our economy. It gives people jobs in areas. Agriculture helps them earn money so they can live. It also makes sure we have food to eat. With technology and better farming methods the weather still affects how well crops grow. Rain, temperature and humidity all play a role in how food we can produce. Lately the weather has been really unpredictable which makes it hard for farmers to plan. So, it is really important to understand how the weather affects agriculture and farming. When we talk about climate variability, we mean the changes in the weather that happen over time. These changes can be big or small. They can still affect when we plant crops how they grow and how water we need. Much rain can hurt crops while not enough rain can make the soil dry and need water. High temperatures can also hurt crops if they get too hot. So, the relationship between the weather and agriculture and farming is complicated.

Pune is a city that has changed a lot over the years. It has grown fast. A lot of buildings and roads have been built. With all these changes people are still farming in and around Pune. Farmers in Pune face a lot of challenges like not having land and water and dealing with changing weather patterns. This makes Pune an interesting place to study how the weather affects agriculture and farming. However, it can be hard to find data about agriculture and farming in Pune City.

To really understand how the weather affects agriculture and farming we need to use some methods. These methods can help us figure out if changes in the weather are actually affecting agriculture and farming. We can look at things like rain and temperature. See how they affect how much food we produce. We can also look at things that might affect agriculture and farming like how water we have what kind of fertilizer we use and what kind of crops we plant. This can help us understand what is really going on with agriculture and farming in Pune. Agriculture and farming are important to study because they are a part of our economy. This study is called “Assessing the Impact of Climate Variability on Agricultural Productivity in Pune City”. It tries to figure out how the weather affects agriculture and farming in Pune. We are looking at rain and temperature. How they affect agriculture and farming. We want to use data to understand what is going on than making guesses. Agriculture and farming are a part of our economy so it is important to understand how the weather affects them. This study is important because it can help farmers, farming organizations and policymakers make decisions. If we know how the weather affects agriculture and farming, we can make plans to deal with it.

How to Cite this Article:
Shankarrao, M. E., & Shende, S. S. (2026). Assessing The Impact of Climate Variability on Agricultural Productivity in Pune City: Evidence from Econometric Analysis. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 158–165. https://doi.org/10.5281/zenodo.22122359

We can use irrigation methods, plant crops that can handle the weather and make sure we have weather forecasts. This can help reduce the risks of agriculture and farming and make them more sustainable. Agriculture and farming are really important to India and climate variability affects agriculture and farming productivity so we need to understand how to deal with it.

Overall, this research tries to connect the weather with outcomes in agriculture and farming. By looking at what's happening in Pune we hope to understand how the weather affects agriculture and farming and what it means for the future of agriculture and farming. Agriculture and farming are really important to India and climate variability affects agriculture and farming productivity so we need to understand how to deal with it. We need to understand how the weather affects agriculture and farming so we can help farmers and policymakers make decisions, about agriculture and farming.

Review of Literature

When we talk about climate conditions and how they affect performance we are looking at a very important issue in agricultural economics and environmental economics. A lot of research has been done on this topic. It suggests that how well crops grow is closely tied to how much rain falls and what the temperature is. However, the impact of these factors can vary depending on the type of crop the region and the farming system. Climate conditions also interact with factors like irrigation, technology, soil quality and the decisions farmers make. So, we cannot look at climate variability as the factor that affects agricultural productivity.

Many studies on agriculture have shown that rainfall is a crucial factor in determining agricultural output. The timing and distribution of monsoon rainfall can affect when crops are planted how they grow and how much water is available. Too much rainfall can be bad for crops causing waterlogging, soil erosion and damage. This means that the relationship between rainfall and agricultural productivity is not always straightforward.

Temperature is another factor that affects crops. Most crops grow well within a temperature range and if the temperature goes outside of this range, it can affect how well they grow. A small increase in temperature may not have an impact but a long period of high temperature can cause heat stress and increase the amount of water crops need. The impact of temperature can also vary depending on the type of crop and the time of year. Therefore, many studies now look at temperature alongside rainfall when examining productivity. A significant amount of research has examined climate change by looking at how it affects production. These studies use models to estimate the relationship between climate variables and agricultural outcomes while taking into account other factors that affect production. Regression-based models are commonly used because they allow researchers to estimate the impact of climate variables on productivity. Other methods, such as panel-data approaches are also useful when looking at data from regions over time. Another important area of research is how farmers adapt to changes in the climate. Farmers can use irrigation, change when they plant crops use crops improve seeds manage fertilizers and adopt new technologies to reduce the negative impacts of climate change. This means that the impact of climate variability on productivity can be reduced if farmers are able to adapt. Regions with irrigation systems and strong agricultural infrastructure may be better able to cope with climate change than areas that rely heavily on rainfall.

Research on Maharashtra is important because the state has a lot of variation in rainfall, irrigation and cropping patterns. Different districts in the state have levels of exposure to drought, irregular rainfall and temperature fluctuations. Therefore, it is not possible to generalize findings from one district to another. A study that looks at a location can provide more useful evidence for local agricultural planning. The existing research also shows that there is a gap in our understanding of how climate change affects agriculture in regions. While there is a lot of research on climate change and Indian agriculture at the state level fewer studies have looked at specific urbanizing regions and their surrounding agricultural systems. Pune is an example of a region where rapid urban expansion is occurring alongside ongoing agricultural activity. Looking at how climate variables affect agriculture in this context can provide local evidence. This study aims to address this gap by looking at the relationship between climate variability and agricultural productivity in Pune using models. Then just comparing numbers the study will estimate the statistical relationship between agricultural productivity and climate variables. The existing research provides a foundation for investigating whether changes in rainfall and temperature are associated with changes in productivity in the study area. Climate conditions and agricultural productivity are closely. This study will examine the relationship between climate variability and agricultural productivity, in Pune. The goal is to provide an understanding of how climate change affects agriculture in this region.

Research Gap

There is a lot of information about how the weather and farming're connected in India. Most of the research looks at the whole country or big regions, not small areas like the farms around Pune. Pune is a case because it is growing really fast people are using the land in different ways and natural resources are under a lot of pressure. With all these changes farming is still happening in some parts of the area. So, it is important to look at how the weather and farming're connected in a small area like this.

Another problem with the research that's already out there is that it sometimes just talks about what the weather is like without really looking at how it affects farming. We need to use math tools to understand how the weather and farming are connected. This study is trying to add to what we know by looking at how certain weather patterns affect farming in Pune.

Objectives of the Study

This study has goals:

1. To look at how the rain and temperature have changed over time in Pune.
2. To see how farming has been doing in the area.
3. To see how the weather and farming are connected.
4. To use math tools to understand how changes in the rain and temperature affect farming.
5. To figure out which weather patterns have the impact on farming.
6. To suggest ways to help farming in the area be more resilient to changes in the weather.

Research Questions

This study is trying to answer these questions:
- Has the rain in Pune changed a lot over time?
- Has the temperature in Pune changed over time?
- How has farming in the area been doing?
- Does the rain have an impact on farming?
- Does the temperature have a big impact on farming?
- Which weather pattern has a bigger impact on farming?
- What can we do to help farming in the area be less affected by changes in the weather?

Research Hypotheses

We have come up with some ideas that we want to test:
H_{01}: Changes in the rain do not have an impact on farming in Pune.
H_{11}: Changes in the rain do have an impact on farming in Pune.
H_{02}: Changes in the temperature do not have an impact on farming in Pune.
H_{12}: Changes in the temperature do have an impact on farming in Pune.
H_{03}: The weather patterns we are looking at do not explain why farming in the area is doing well or poorly.
H_{13}: The weather patterns we are looking at do explain why farming, in the area is doing well or poorly.
We will use math tools to test these ideas. We will look at the numbers. Make conclusions based on what we find.

Research Methodology

This study uses a research design to look at the relationship between climate variability and agricultural productivity in Pune. We want to know how climate conditions affect outcomes so we are using an econometric approach. We are using data from official sources for our study period. We chose the variables and estimation methods based on the availability, consistency and frequency of the data.

Nature and Sources of Data

We are using time-series data about climate conditions and agricultural performance. We get data on rainfall and temperature from meteorological and government sources. We get data on production, cultivated area and yield from agricultural and statistical publications of the Government of Maharashtra. We also get information from the Maharashtra Economic Survey, Directorate of Economics and Statistics and other official datasets. For our analysis we will organize observations for a consistent study period. We will clearly define the unit based on the availability of agricultural data. If we do not have city-level agricultural data we will use the wider Pune district or agricultural region instead of making artificial city-level estimates.

Variables Used in the Study

Agricultural productivity is what we are trying to measure. We will measure it by looking at yield, which is the output per hectare rather than total agricultural production. This is important because total production can increase just because the cultivated area gets bigger.

The main variables we are looking at are:

- Rainfall: how rain we get each year or each season.
- Temperature: the temperature or the temperature for each season.
- Irrigation: how much of the cultivated land has irrigation if we have data.
- Fertiliser Use: how much fertiliser we use per unit of cultivated area if we have data.
- Cultivated Area: the total area used for the selected crop or agricultural activity.

We also need to include control variables to make sure we are not just looking at how climate affects productivity. Other agricultural inputs can also affect production.

Econometric Model

We can start with a model that looks like this:
Agricultural productivity in year t = constant term + coefficient for rainfall in year t + coefficient for temperature in **year t + coefficient for irrigation in year t + coefficient for fertiliser use in year t + error term**

Where:
- Agricultural productivity in year t is what we are trying to measure.
- Rainfall in year t is how much rain we get each year.
- Temperature in year t is the average temperature for each year.
- Irrigation in year t is how much of the cultivated land has irrigation.
- Fertiliser use in year t is how much fertiliser we use per unit of cultivated area.
- Constant term is a constant value.
- Coefficients are the values we estimate.
- Error term is the difference between what we expect and what we actually get.

The coefficients will tell us how much each variable affects productivity while keeping other factors constant.

Econometric Estimation Procedure

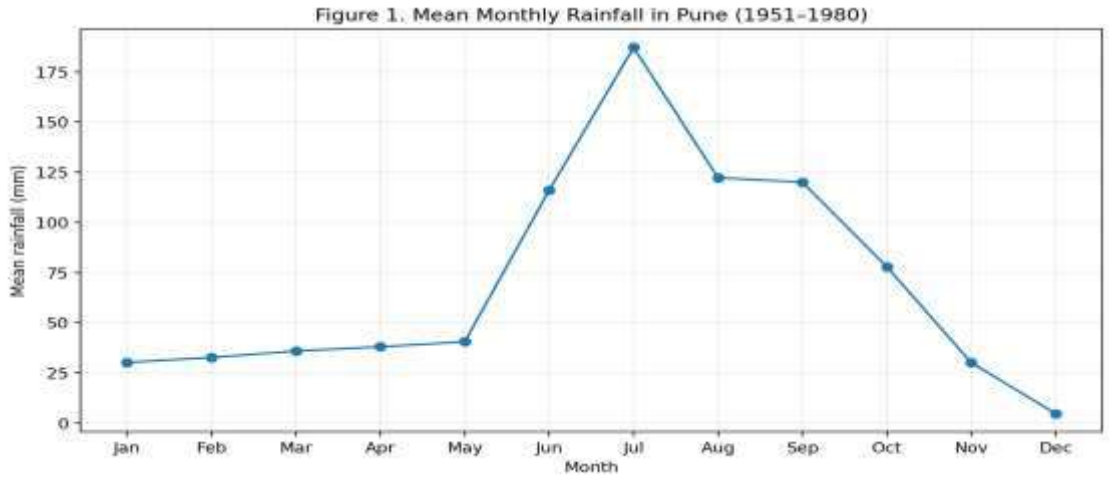
We will start by looking at descriptive statistics and trends to understand how climate and agricultural productivity are changing. Then we will do a correlation analysis to see how the variables are related. Before we estimate the model, we need to check if the variables are stationary. If they are not, we might get results. We can use tests, like the Augmented Dickey-Fuller test to check for stationarity. If the variables are not stationary, we might need to use a time-series technique.
We will also do tests to make sure our model is reliable. We will check for multicollinearity, heteroskedasticity

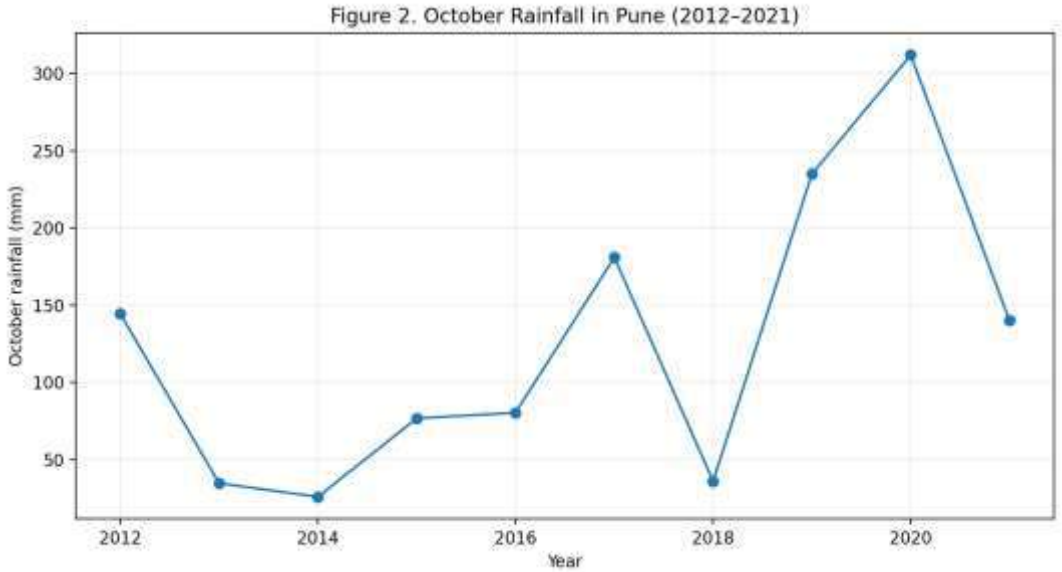
and autocorrelation. We will look at the significance of each coefficient and the overall explanatory power of the model. The final model will depend on the data we have. We will not assume anything in advance. We will report our findings after we estimate the model using the data.

Data Analysis and Preliminary Evidence

The preliminary analysis starts with looking at the rainfall in Pune. Rainfall is a deal for farming because of when it happens how much rain falls and how it is spread out. This affects how wet the soil is, how much water crops need and how they grow. The official India Meteorological Department data, for Pune shows that most of the rain falls during times of the year. The months of July, August and September get the rain. July gets the rain on average with 187.2 mm of rain then August and September get a lot of rain too.

Explanation of Graph 1





Graph 1 helps us see when it rains in Pune. The rain starts to fall in June. It rains the most in July. Then the rain starts to fall in August and September. After October the rain almost stops. This is important for people who farm because the rain affects when they can plant seeds how their crops grow and how water they need.

Explanation of Graph

Graph 2 shows us how much it rained in Pune in October each year from 2012 to 2021. Some years like 2013, 2014 and 2018 had little rain. Other years, like 2017, 2019 and especially 2020 had a lot of rain. This graph helps us see that we should look at how much it rains each year not the average rain over many years. October rainfall in Pune is very important. October rainfall in Pune varies a lot. We should look at the October rainfall, in Pune each year to understand the pattern.

Explanation of Table 1: Mean Monthly Rainfall in Pune (1951–1980)

Table 1. Mean Monthly Rainfall in Pune (1951–1980)

Month	Mean Rainfall (mm)
January	30.3
February	32.8
March	36.0
April	38.1
May	40.6
June	116.1
July	187.2
August	122.3
September	120.1
October	77.9
November	30.2
December	4.8

Table 1 shows us that it rains a lot in Pune during some months. July is the month when Pune gets the rain with an average of 187.2 mm of rain. August and September are also very rainy with 122.3 mm and 120.1 mm of rain... In December it hardly rains at all with only 4.8 mm of rain. This shows that most of the rain in Pune falls during the monsoon months. The rain in Pune is mostly concentrated in a month

Table 2. October Rainfall in Pune (2012–2021)

Year	October Rainfall (mm)
2012	144.5
2013	34.7
2014	25.9
2015	76.7
2016	80.4
2017	180.9
2018	36.0
2019	235.0
2020	312.0
2021	140.0

Explanation of Table 2: October Rainfall in Pune (2012–2021)

Table 2 shows us how much it rained in Pune in October each year. The year with the rain was 2014 with only 25.9 mm of rain. In 2020 it rained a lot with 312.0 mm of rain. This is a difference. It shows that the rain in October can be very different from one year to another. This is because of changes in the weather. These changes can make it hard for people to farm.

Econometric Analysis and Model Specification

The main purpose of the analysis is to see if changes in the weather are related to changes in how well farms do in Pune. This analysis goes beyond looking at the numbers by trying to figure out how agricultural productivity and weather and farming factors are connected.

Model Specification

Agricultural productivity is what we are trying to understand and weather factors like rainfall and temperature are what we think might affect it. We also want to look at things like irrigation and what farmers use to help their crops grow. The basic idea of our model can be written like this:

Agricultural Productivity = a number + a change in Rainfall + a change in Temperature + a change in Irrigation + a change in what farmers use + some error

Where Agricultural Productivity is how well the farms do Rainfall is how rain there is Temperature is how hot or cold it is Irrigation is how much water the farms get and what farmers use is things like equipment and seeds.

If it rains more it might help the farms do better. Too much rain can be bad. If it is hotter or colder it can also affect the farms.

Correlation Analysis

Before we try to understand how all these things are connected, we want to see if there is any relationship

between them. If Rainfall and Agricultural Productivity seem to go down together that might be a good sign. Just because two things seem to happen together it does not mean that one causes the other. There are a lot of things that can affect how well farms do, like how water they get what kind of seeds they use and what the soil is like.

Stationarity and Time-Series Properties

Since we are looking at what happens over time, we need to make sure we understand how the numbers are behaving. If the numbers are not stable it can give us answers. So, we use a test to see if the numbers are stable.

If the numbers are stable, we can try to understand how they are connected. If they are not stable, we might need to use a method to understand them.

Diagnostic Tests

We need to make sure our model is good and reliable. We do this by checking for a thing. We want to make sure that the factors we are looking at are not closely related. We also want to make sure that the errors in our model are not affected by the factors we are looking at. We want to make sure that the numbers from one year are not affecting the numbers from another year. If we need to, we can use methods to make our model more reliable. We want to make sure we are not missing any important factors or using the wrong method.

Interpretation of Estimated Coefficients

When we have our model, we can see how the different factors affect Agricultural Productivity. We can see if Rainfall and Temperature are really connected to how the farms do. We can see how strong the connection is. We also want to make sure that our model is a one. We can do this by looking at how it explains what is happening. We want to make sure that our model is valid which means it is a good representation of what is really happening.

It is also important to remember that we are not assuming that changes in the weather always make farming worse. We are just trying to see what really happens.

Expected Contribution of the Econometric Analysis

Our analysis should give us an understanding of how changes in the weather affect Agricultural Productivity. We can use this to understand how to help farms do better when the weather is bad. We can use it to make good decisions about farming and water and crops in the Pune area. This will help us give advice on how to deal with changes in the weather and how to make farming better, in the Pune region.

Discussion of the Study

The early findings show that rainfall in Pune has a pattern that changes a lot from one year to the next. This kind of weather change can create problems for farming especially when the rain does not follow the pattern. The effect on how much food's grown depends on when the rain comes how hard it falls and how spreads out it is, not just on how much rain there is in total. How rain affects farming can also be different if there is irrigation. Farmers who have water systems may not need as much rain and can handle changes in rain better. Farming that depends a lot on rain may be more affected by a late start to the rainy season long dry times or too much rain.

Temperature is another part of weather change. Different crops need temperatures and when the weather is not right the crops may not grow well may not flower and may not produce as much. So, the model used should look at temperature along with rain not rain alone. The Pune area is also changing in ways. More cities are growing land use is changing people need water and the economy is moving more towards non-farming jobs. These changes can affect farming along with the weather. So, the effect of the weather on farming must be looked at in the picture of the local farming and economy.

The final results from the model will show if the weather changes have a connection to farming. If the numbers for rain and temperature are real and not just random then how big and which way they go will show how sensitive farming is to weather. If those numbers are not real that means other things might explain why farming changes during the study period.

Policy Implications

This study has a few effects on how policies are made. First better access to weather details can help farmers decide when to plant, water and harvest. Local weather reports and quick advice about the weather can help reduce the worry from rain that does not come on time. Second making water systems better can help farmers not rely much on the rain. Tools that save water, better water systems and better ways to use groundwater can help farmers deal with rain that's not regular. Third growing crops and using plants that can handle weather changes can help farming be more stable. Planning what to grow should look at how rain there is, how much water is available and the weather, not just on old ways of growing.

Fourth policies for farming should focus more on dealing with weather risks. Insurance for crops help when there is a disaster and easy access to farming loans can give money help when bad weather causes problems with crops. Finally planning for farming in places that are growing quickly like Pune needs to work between how lands used how water is handled and how farming is run. Keeping farming land and making sure water is used well can help farming last longer.

Limitations of the Study

This study has some problems. It is hard to get farming data that's exactly for Pune City because most of the farming and official data is for bigger areas like districts or smaller areas called talukas. So, the study area must be chosen carefully. The study also looks at some weather factors, like rain and temperature. Other things like the type of soil, insects, technology, how good the water systems are and big weather events may also affect farming but might not be in the model.

Finally, how good the results from the model are depends on how how good and how the data is over time. These issues should be considered when looking at the results and making decisions, about policies.

Conclusion

Climate variability is a deal when it comes to farming. It can affect how stable and sustainable food production

is. Looking at the rainfall pattern in Pune we can see that it rains a lot during times of the year but the amount of rain can vary greatly from year to year. This can make it hard for farmers to plan because they need the amount of rain at the right time for their crops to grow. The study shows that we should look at how climate and farming're connected using numbers and statistics. Rain and temperature can directly affect how well crops grow and things like irrigation and technology can change this. So, using a statistical model is better than just looking at simple numbers. The study also shows that we should not blame climate variability for all the changes in farming production. There are other factors that can affect farming, like economics and technology. We should look at all the numbers and statistics before making any conclusions. For Pune this is especially important because the city is growing fast and using up a lot of land and water. Helping farmers deal with climate variability can reduce risks. Make farming more stable.

Suggestions

Based on what we have learned here are some ideas:

1. Helping Farmers with Weather Information:

Farmers should get information about the weather like rain and temperature so they can make decisions about planting and harvesting.

2. Making Irrigation Better:

We should help farmers use water efficiently especially in areas where water is scarce. This can help reduce the impact of rainfall.

3. Growing Crops that can Handle Climate Variability:

Farmers should grow crops that're suitable for the local climate and can handle drought or too much rain.

4. Growing Different Crops:

If farmers only grow a few crops, they are more likely to be affected by climate variability. Growing many different crops can spread out the risk.

5. Helping Farmers with Insurance:

Farmers should have access to insurance that can protect them from losses due to abnormal weather.

6. Keeping Track of Farming Data:

We should collect more data on farming like crop yields and rainfall to help with future research.

7. Planning for Urban and Farming Growth:

Since Pune is growing fast, we should make sure that we plan for the needs of both the city and the farmers especially when it comes to land and water use.

Final Remark

The study shows that we need to look at climate variability and farming production in a location to really understand what is going on. Looking at the rainfall in Pune we can see that it varies a lot from year, to year.. To really know how it affects farming we need to look at more data and use statistical models. This can help us make policies to help farmers deal with climate variability. Climate variability and farming production are closely. We need to understand this connection to make a difference.

Acknowledgment

The authors sincerely express their gratitude to Narayanrao Chavan Law College, Nanded, Maharashtra, affiliated with Swami Ramanand Teerth Marathwada University, Nanded, for providing the academic environment and institutional support necessary for completing this research.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030431

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 20 July 2026

Revised: 28 July 2026

Accepted: 17 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22122408

DOI Link:
https://doi.org/10.5281/zenodo.22122408

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Samudra Sampada: Vedic Wisdom and The Sustainable Roots of India's Blue Economy

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Abstract
The Blue Economy paradigm, which emphasizes the sustainable use of ocean and marine resources for economic growth while preserving ecological health, is often framed as a contemporary policy innovation. This paper argues that India's Blue Economy vision finds deep resonance in its ancient Indian Knowledge Systems (IKS), particularly the maritime traditions of the Vedic period. Drawing on references from the Rig Veda, Atharva Veda, and other Vedic literature, the study traces how ancient Indian communities engaged with the sea through navigation, ship building and coastal trade while embedding this engagement within a cosmological worldview that treated the ocean (Samudra) as sacred and its resources as finite. The paper draws on the symbolism of Samudra Manthan, the mythological churning of the ocean, as a metaphor for extracting value from marine resources through effort, patience and balance rather than extraction alone. Using a historical interpretive approach, the study connects archaeological evidence of ancient port infrastructure e.g. Lothal and textual references to maritime deities such as Varuna with the three pillars of the modern Blue Economy framework ie. economic growth, environmental sustainability and social equity. The paper concludes that reviving IKS based principles of restraint, reverence and reciprocity toward marine ecosystems can meaningfully inform India's contemporary Blue Economy policy, offering an indigenous, culturally rooted complement to global sustainability frameworks.

Keywords: *Blue Economy, Samudra Manthan, Indian Knowledge Systems (IKS), Arthasastra, marine governance, precautionary principle, ocean sustainability.*

Introduction

At the centre of this recovery is Samudra Manthan, the churning of the cosmic ocean. When we read through an IKS lens rather than a purely theological one, the myth functions as an early epistemic model of resource extraction, wealth (Lakshmi), vitality (Amrita) and abundance (Kamadhenu) are drawn from the sea only through sustained cooperative effort and only after a toxic byproduct (Halahal) is deliberately contained. This sequencing cooperates, absorb risk then distribute gain anticipates, in mythic form, the precautionary and equity principles now formalized in international Blue Economy frameworks. Complementing this cosmological layer, the Arthashastra supplies an administrative fiscal model licensing, taxation, a maritime bureaucracy under the Navadhyaksha, while the Dharmashastra and Buddhist Jain ethics supply a restraint based, nons-tate layer of environmental conduct together constituting a pre-modern, multitiered governance stack for ocean resources. The paper's central claim is epistemic not merely historical IKS did not lack a Blue Economy concept it lacked only the modern vocabulary for what it had already theorized. Positioning Samudra Manthan as a foundational IKS text for ocean governance offers contemporary Indian policy Sagarmala, PMMSY, the Deep Ocean Mission an indigenous intellectual lineage, rather than treating sustainability bound maritime growth as an imported paradigm.

The Earth is not a landmass with oceans at its edges ….it is an ocean with landmasses at its edges.

Water covers roughly 71% of the Earth's surface with land accounting for the remaining 29%. A ratio confirmed by the U.S. Geological Survey, which notes that about 71% of the Earth's surface is water-covered and that oceans hold roughly 96.5 % of all the planet's water. It is this dominance of water that gives Earth its popular name the "Blue Planet". If economic geography has historically organized itself around the smaller 29%, we call land, then a civilization's future prosperity logically depends on how intelligently it engages with the 71% it has largely left unmanaged. If we think this way, the Blue Economy is not a new frontier of growth it is a long overdue correction to a planetary imbalance in how humanity has allocated its economic attention.

How to Cite this Article:
Bokhare, A. S., & Patil, V. V. (2026). Samudra Sampada: Vedic Wisdom and The Sustainable Roots of India's Blue Economy. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 166–169. https://doi.org/10.5281/zenodo.22122408

That correction, as this essay argues is ancient India had already begun to think through in myth, in law and in scripture long before the term "Blue Economy" existed. The "Blue Economy" is usually presented as a 21st century idea a UN and World Bank framework post 2012 Rio 20 for balancing ocean based economic growth with marine sustainability. But India's own textual tradition Vedic, Puranic, Buddhist, Jain and the codified statecraft of the Arthashastra and Dharmashastra already contains a working conceptual base for exactly this balance. The sea as a source of wealth ie. Artha, regulated by restraint and duty (dharma) and treated with a mix of reverence and caution. This piece builds that base, text by text and then maps it onto the Blue Economy as practiced in India today.

The Textual Foundations

The Vedic Ocean Wealth Bearer and Origin Point

The Vedas call the ocean, "Ratnakara" means "the bearer of jewels" and Samudra is described as the reservoir from which rivers, rain and wealth ultimately flow. This is the earliest articulation of the sea as an "economic resource base" not just a geographic boundary. The Vedic hymns also carry some of the first hydrological observations in Indian thought the water cycle, evaporation, and rainfall treating the ocean as the source node of a resource system that sustains agriculture and settlement inland. This is conceptually close to the modern Blue Economy's starting premise. The ocean is not peripheral to the economy; it is foundational to it.

Samudra Manthan

The Puranic Model of Extraction and Risk

This is arguably ancient India's most sophisticated metaphor for resource extraction. In the myth, devas and asuras jointly churn the cosmic ocean to draw out its treasures Lakshmi (wealth), Amrita (regenerative power), Kamadhenu, gems and other "ratnas". But the churning also releases "Halahala", a poison potent enough to destroy creation, which Shiva must absorb and contain before the beneficial resources can be safely distributed.

Reading it as an economic parable rather than pure theology, Samudra Manthan encodes three principles directly relevant to a modern blue economy

i. **Extraction requires cooperation and shared effort** (devas and asuras churn together) resources cannot be claimed by force alone.
ii. **Extraction is not risk-free** the same act that yields wealth also releases hazard like pollution, ecological toxicity, disaster risk and that hazard must be actively managed & not ignored.
iii. **Distribution of gains is a governance problem** much of the epic's drama after the churning is about how the extracted wealth is allocated, not just how it's obtained.

This is a strikingly modern precautionary principal logic, centuries before the phrase existed.

Kautilya's Arthashastra the Administrative Blue Economy (c. 3rd century BCE)

Where the Puranas gave the 'Ethic', the Arthashastra gave the 'institution'. It is the closest thing ancient India has to an actual blue economy governance manual. A dedicated official, the 'Navadhyaksha' ie. Superintendent of Ships, managed accounts for navigation across sea, estuaries and rivers and levied duties on maritime cargo. Fisheries and passengers were taxed and aquatic resources like fish in lakes, for example were placed under state protection with licensed extraction. a Superintendent collected a fixed toll roughly one-tenth on catches, rather than allowing open, unregulated harvest. Water-use taxation applied to anyone drawing from rivers, lakes or springs and the state was obligated to invest in reservoirs and water infrastructure an early public investment model for water and maritime infrastructure. Kautilya also classified geography forest, water body, coast, plain by economic and ecological function, effectively zoning resources by use a conceptual ancestor of today's Marine Spatial Planning.

This is a genuine ancient regulatory fiscal architecture for ocean and water resources licensing, taxation, infrastructure investment and a bureaucracy to administer it.

Dharmashastra and Manusmriti Moral Restraint as Environmental Law (c. 100 CE)

Where the Arthashastra regulated the state's extraction, the Dharmashastra regulated individual conduct toward water and marine life. Manusmriti explicitly prohibits throwing impure substances into water an early water pollution injunction. The text extends protective concern to non-human species and treats unnecessary killing and environmental degradation as morally deficient acts, not merely practical ones. Dietary codes go further, discouraging fish consumption on the reasoning that eating fish compounds harm across the food chain a proto conservation argument built on restraint rather than prohibition by force. Together, these texts locate resource restraint inside personal dharma or duty rather than only in state law. This is a second, parallel regulatory channel internalized ethical restraint alongside external state regulation.

Buddhist and Jain Ethics Livelihood as a Constraint on Extraction

Buddhist "Right Livelihood" one limb of the Eightfold Path explicitly discourages trades that cause direct harm to living beings, which historically placed moral weight against certain forms of fishing and marine animal trade as default livelihoods, even where not formally banned. Jain ahimsa carries this further, treating minimal harm livelihood as a spiritual discipline. These traditions don't offer administrative detail like the Arthashastra but they supply a third layer demand side restraint discouraging over extraction not through taxation or law but through the social status attached to a livelihood.

Sangam Literature and Coastal Community Codes

The Sangam corpus classifies landscapes into five "thinais" ecological emotional zones, one of which "Neydal" is explicitly the coastal or maritime zone, governed by its own community life, deities like Varunan, occupations like fishing, salt making, pearl diving and social codes. This is significant because it is regionally rooted, community scale resource management, distinct from the Sanskrit state models of the Arthashastra. It is the ancient ancestor of what

fisheries economists today call customary or community based coastal resource governance, the kind later formalized in practices like the Tamil Nadu, "padu" system.

Synthesizing an "Ancient Blue Economy" Framework

Pulling these threads together, ancient India actually offers four distinct, complementary layers of blue economy thinking not a single doctrine but a stack, Layer, Source tradition & Modern equivalent

a. Resource base & wealth generation, Vedic hymns, Samudra as Ratnakara, Ocean as a growth sector GDP contribution
b. Risk & precaution in extraction, Samudra Manthan in Puranas, Mahabharata and Environmental Impact Assessment, precautionary principle in deep-sea mining
c. State regulation, taxation, licensing, infrastructure. As mentioned in Arthashastra as Navadhyaksha, fishery tolls, water tax. Ministry of Ports & Shipping, licensing regimes, port infrastructure investment as in Sagarmala
d. Ethical & personal restraint on extraction as Manusmriti, Buddhist, Jain right livelihood Sustainability certification, "blue revolution" ethos in PMMSY
e. Community & customary coastal governance mentioned in Sangam Neydal culture Community based fisheries management, coastal livelihood schemes under Sagarmala

The throughline across all layers is a single idea that the sea is wealth that must be governed, not just wealth that must be taken. That is, in essence, the definition of the Blue Economy today.

The Insight Is Ancient, the Institution Is New

While Bridging Both ancient and modern concept we found the insight is ancient and institution is new. Samudra Manthan told us, in myth, what economics has only recently admitted in policy. The ocean is not empty space at the edge of the map it is a treasury waiting to be governed, not merely a boundary waiting to be crossed. The gods and demons churned the ocean not because it was incidental to their world, but because they understood millennia before the term "Blue Economy" existed that wealth (Lakshmi), vitality (Amrita) and abundance (Kamadhenu) all originated from the sea and yet, despite this ancient recognition, human economic systems spent the following centuries organizing themselves almost entirely around land treating the ocean as a route for trade rather than a source of value in its own right. This is the paradox worth naming plainly. the myth that first articulated the ocean as a source of wealth is thousands of years old, but the economic parameters to formally govern that wealth are barely a decade old. Samudra Manthan gave humanity the insight. The Blue Economy is only now supplying the institution.

What the churning produced was not just treasure, but a warning that wealth drawn from the ocean comes bundled with risk ie. Halahala and must be governed with the same seriousness with which it is extracted. To ignore the ocean as an economic asset for centuries and then to suddenly extract from it without setting parameters, is to take the nectar of Samudra Manthan while refusing to reckon with its poison. Setting parameters, then is not a modern invention it is a modern fulfilment of an ancient instruction. The Blue Economy's insistence on sustainable limits is simply Samudra Manthan's precautionary lesson translated into policy language extract but contain grow, govern & draw wealth from the sea, but do not mistake the sea for an inexhaustible source. In short Samudra Manthan named the ocean as wealth. Centuries of land centered economics ignored that name. The Blue Economy is the overdue act of finally setting parameters around a truth mythology stated first.

India's Blue Economy Today

India's contemporary Blue Economy architecture rests on several interlocking pillars and each maps recognizably onto one of the ancient layers above

Fisheries and aquaculture:

Fish production nearly doubled in a decade 96 lakh tonnes in 2013-14 to 195 lakh tonnes in 2024-25 under the "Pradhan Mantri Matsya Sampada Yojana" (PMMSY), a 20,050 crore rupees scheme explicitly framed as a "Blue Revolution" echoing the Arthashastra's licensed, taxed, state supported fishery model but at industrial scale.

Ports, shipping and logistics: The Sagarmala Programme modernizes port infrastructure and coastal economic zones, directly paralleling the Navadhyaksha's role of administering maritime trade and revenue and its "Coastal Community Development" component serving the 18% of India's population living in 72 coastal districts echoes the Neydal zone community livelihood model.

Deep-sea exploration and mining: The Deep Ocean Mission, including the MATSYA-6000 submersible and India's "Pioneer Investor" status with the International Seabed Authority for polymetallic nodules in the Central Indian Ocean Basin, is the modern Samudra Manthan churning the ocean floor for mineral wealth, while wrestling with the same precaution versus extraction tension the myth encodes debates over a deep sea mining moratorium mirror the myth's warning that extraction releases hazard alongside treasure).

Marine conservation and blue carbon: Programs for mangrove and coral protection and "blue carbon" valuation of coastal ecosystems, resemble the Dharmashastra's ethic of restraint treating marine ecosystems as something the extractive state owes a duty of care to, not merely a resource to exhaust.

Strategic/foreign policy dimension: The Maritime Amrit Kaal Vision 2047 and India's SAGAR ie. Security and Growth for All in the Region doctrine extend the blue economy into geopolitics a modern echo of the Arthashastra's view of maritime capacity as inseparable from state power.

India's blue economy currently contributes roughly 4% of GDP with a national ambition cited in various policy documents of scaling ocean based economic activity substantially by 2030 to 2047 essentially institutionalizing at nation state scale, the same extraction with governance logic ancient Indian texts

first worked out mythologically, administratively and ethically.

Conclusion:

Ancient India did not have a single text called "Blue Economy" but it had something arguably richer. a layered civilizational stack combining a cosmology of the sea as wealth source mentioned in Vedas, a cautionary parable about the risks of extraction as in Samudra Manthan, a regulatory fiscal state apparatus to administer maritime and aquatic resources as in Arthashastra, a personal ethic of restraint toward water and marine life as in Dharmashastra, Buddhist & Jain thought and localized community governance of coastal livelihoods as in Sangam literature. Modern India's Blue Economy PMMSY, Sagarmala, The Deep Ocean Mission, marine spatial planning and blue carbon policy is best understood not as an imported Western framework grafted onto India but as a re institutionalization of a governance logic India's own textual and cultural tradition had already articulated in different vocabularies over two millennia ago.

Acknowledgment

The authors sincerely express their gratitude to Narayanrao Chavan Law College, Nanded, Maharashtra, affiliated with Swami Ramanand Teerth Marathwada University, Nanded, for providing the academic environment and institutional support necessary for completing this research.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030432

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 20 July 2026

Revised: 28 July 2026

Accepted: 17 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22122736

DOI Link:
https://doi.org/10.5281/zenodo.22122736

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Ai In Indian Judiciary: A Comprehensive Study Evaluating Operational Deployments, Administrative Obstacles, And Supreme Court Directives

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Abstract
The integration of Artificial Intelligence (AI) into the Indian judiciary represents a paradigm shift toward modernizing legal administration, enhancing processing efficiencies, and addressing massive case backlogs that have historically strained the justice delivery system. India's judiciary, burdened by one of the largest case pendency figures in the world, has increasingly turned toward digital and computational tools to reduce procedural delay without compromising the constitutional guarantees owed to litigants. This comprehensive research article evaluates operational deployments, administrative obstacles, and Supreme Court directives governing AI usage under the e-Courts framework. It examines the operational boundaries established by the Supreme Court White Paper, the active AI assistive ecosystem (including SUVAS, SUPACE, and LegRAA), legal integrity and professional accountability concerning generative AI hallucinations, and structural process engineering integrated under Phase-III. The study further situates these developments within a constitutional and comparative framework, arguing that India's cautious, human-centred model of AI adoption offers a template that other developing judiciaries may study as they confront similar backlogs, resource constraints, and linguistic diversity. The paper concludes that sustained capacity building, rigorous ethical audits, and close collaboration between the legal profession and technologists will determine whether AI ultimately strengthens, rather than erodes, public confidence in the administration of justice.

Keywords: *Artificial Intelligence (AI); Indian Judiciary; e-Courts Project; Phase-III; Judicial Technology; SUVAS; SUPACE; LegRAA; AI-Assisted Legal Research; Generative AI; AI Hallucinations; Legal Ethics; Professional Accountability; Sovereign Data Security; Data Privacy; Human-in-the-Loop; Algorithmic Bias; Due Process; Article 21; Access to Justice; Legal Technology; Judicial Automation*; Natural Language Processing (NLP); Automated Transcription; Digital Courts; National Judicial Data Grid (NJDG).

Introduction and Historical Evolution of the e-Courts Project

The integration of Artificial Intelligence into the Indian judiciary is the culmination of decades of systematic digital evolution under the e-Courts Mission Mode Project. Historically, the Indian judicial system relied heavily on manual record-keeping, physical paper filing, and localized administrative silos. These traditional workflows contributed significantly to docket explosions and prolonged trial durations, with litigants frequently waiting years for even preliminary hearings. Cause lists were compiled manually, case files travelled physically between registries, and there was no unified mechanism through which litigants, advocates, or policymakers could track the movement of a case across the judicial hierarchy. Recognizing the urgent need for structural reform, the Supreme Court of India initiated the e-Courts project across multiple sequential phases, each designed to build incrementally upon the digital foundation laid by its predecessor. The rationale behind this phased approach was deliberate. Rather than attempting an abrupt, system-wide overhaul that risked disrupting ongoing litigation, policymakers chose to first digitize existing records and processes before layering advanced computational intelligence on top of that infrastructure. This measured strategy reflects a broader institutional caution that has come to characterize India's approach to judicial technology: modernize steadily, validate each layer of automation, and preserve human oversight at every stage.

Phase-I and Phase-II Foundations

The initial phases focused primarily on computerizing district and subordinate courts, which together handle the overwhelming majority of case filings in the country.

How to Cite this Article:
Kadamb, R. S. (2026). Ai In Indian Judiciary: A Comprehensive Study Evaluating Operational Deployments, Administrative Obstacles, And Supreme Court Directives. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 170–175. https://doi.org/10.5281/zenodo.22122736

Key priorities included installing hardware infrastructure such as computers, servers, and local networking equipment in court complexes that had previously operated with little to no digital tooling; establishing local area networks (LAN) to allow registries within a court complex to share data; and rolling out the National Judicial Data Grid (NJDG) to track case statuses and pendency nationwide. The NJDG, in particular, proved transformative, as it converted what had been a fragmented patchwork of paper registers into a searchable, centralized database that judges, litigants, and researchers could consult in real time.

These early initiatives established essential connectivity standards and converted decentralized court registries into structured databases. Beyond the purely technical achievement, Phase-I and Phase-II also cultivated a generation of court staff and judicial officers who became familiar with basic digital workflows — a cultural and administrative readiness that would prove indispensable once Phase-III introduced more sophisticated, AI-driven tools. Without this groundwork, the leap to automated scrutiny, transcription, and translation attempted in Phase-III would have been considerably more difficult to absorb operationally.

Transition to Phase-III

Building upon these foundational digital repositories, Phase-III marks a profound shift toward intelligent automation, predictive data analytics, and secure AI deployment. Supported by a central budget outlay, Phase-III moves beyond paper digitization to create an integrated ecosystem in which case data, court records, and hearing transcripts are not merely stored digitally but are actively processed, indexed, and mined for patterns that can inform administrative decision-making. This represents a qualitative shift from digitization as an archival exercise to digitization as the raw material for computational governance of court processes.

Massive digitization efforts have yielded key operational metrics that illustrate the scale of this transformation:

- Digitized District Court Pages: 354.87 Crore Pages
- Digitized High Court Pages: 224.66 Crore Pages
- E-Filed Legal Matters: 92.08 Lakh Filings
- Video Conferencing Sessions: 3.81 Crore Hearings

This extensive data ecosystem provides the raw material necessary for training and deploying advanced natural language processing (NLP) models, machine learning scrutiny modules, and automated transcription engines across court complexes. The sheer volume of digitized material also raises its own governance questions, since a repository of this size becomes an attractive target for both legitimate research use and potential misuse, making the sovereign data security concerns discussed later in this paper particularly salient.

Part I: The Supreme Court's AI Vision and Governance Architecture

Analyzing operational boundaries, advisory positions, and the constitutional 'Assistive Technology' mandate reveals a deliberate design where technology serves to augment rather than replace human faculties. The judiciary maintains that while computational tools accelerate administrative throughput, the moral weight of judicial decision-making must remain exclusively human. This governance philosophy is not incidental; it reflects a considered institutional response to global anxieties about algorithmic opacity, automation bias, and the erosion of due process in judicial settings where AI has been deployed with less caution.

The White Paper Mandate & High-Level Oversight

The White Paper: Released by the Supreme Court's Centre for Research & Planning, this document formally asserts that AI serves exclusively as an assistive tool. It protects the core judicial task of verdict drafting, reserving decision-making strictly for human judges. The White Paper is significant not merely as a policy statement but as an interpretive anchor: it establishes the vocabulary and conceptual boundaries — 'assistive' versus 'determinative' functions — that subsequent circulars, committee guidelines, and even the May 2026 ruling on hallucinated citations draw upon.

High-Level AI Committee: Monitored by a sitting judge of the Supreme Court, this central committee evaluates AI systems for translations, processing, and electronic case filings. The unit sets regional legal guidelines, hardware configurations, and ethical codes of conduct across state registries. Its composition, drawing on both judicial officers and technical experts, is intended to ensure that deployment decisions are informed simultaneously by jurisprudential sensitivity and engineering feasibility — a balance that purely technocratic or purely judicial committees might struggle to strike alone.

Active AI Assistive Ecosystem

SUVAS (SC Vidhik Anuvaad Software): Translates English files, orders, and judgments into standard Indian vernacular languages, broadening legal access for litigants. Given India's linguistic diversity, SUVAS plays an outsized role in making judicial outcomes intelligible to litigants who may otherwise depend entirely on intermediaries to understand orders that directly affect their liberty, property, or livelihood.

SUPACE (SC Portal Assistance in Court Efficiency): Identifies relevant legal precedents and processes case data to assist researchers and judges in navigating jurisprudence. By surfacing relevant case law and statutory cross-references, SUPACE reduces the time judicial clerks spend on preliminary research, allowing that time to be redirected toward substantive analysis rather than mechanical retrieval.

LegRAA: Developed by the National Informatics Centre (NIC) Pune, this research assistant summarizes documents and extracts legal citations across court archives. Lesra's summarization capability is particularly valuable in matters involving voluminous documentary evidence, where manual review would

otherwise consume disproportionate judicial and administrative bandwidth.

Taken together, these three tools illustrate a consistent design philosophy: each addresses a distinct bottleneck — language, research, and summarization — while stopping short of generating binding legal conclusions. This division of labour reinforces the White Paper's assistive mandate at a practical, tool-by-tool level.

Part II: Guarding Legal Integrity, Ethics, and Sovereign Risk

Investigating accountability, systemic hallucinations, data privacy, and expert oversight highlight vital safeguards implemented to preserve institutional credibility. As generative AI tools enter legal workflows, the justice system faces unique risks that require clear regulatory standards, since errors introduced through AI-assisted drafting or research can propagate through the appellate hierarchy if left uncorrected at the trial stage.

Risks and Vulnerabilities in AI Integration

Hallucinations and Fabricated Precedents: Generative AI models and commercial Large Language Models (LLMs) operate on probabilistic text generation rather than authoritative legal indexing. Consequently, these models can produce plausible but non-existent legal citations, misstate statutory provisions, or conflate distinct judicial holdings. When unverified AI summaries are introduced into pleadings or judgment drafts, they risk creating procedural errors and improper delays. Because such fabricated citations are often stylistically indistinguishable from genuine ones, they can evade cursory review and surface only when opposing counsel or the bench attempts to verify the underlying authority — at which point valuable court time has already been expended.

Confidentiality Breaches and Sovereign Data Security: Submitting sensitive case materials, unreleased draft judgments, or proprietary trial strategies into external or public cloud-based AI tools creates data privacy risks. Commercial LLMs frequently utilize user inputs to fine-tune future weights, creating a risk that confidential judicial records or protected personal data could be exposed. This concern is heightened in matters involving national security, commercial trade secrets, or vulnerable litigants such as minors and survivors of sexual offences, where even limited exposure could cause irreversible harm.

Algorithmic Bias and Structural Distortions: Algorithms trained on historical case data may perpetuate underlying patterns or historical reporting disparities. If left unmonitored, automated triage systems could misclassify case priorities, impacting administrative fairness and access to justice. Because historical judicial data reflects the socio-economic and regional imbalances of the period in which it was generated, any tool trained uncritically on such data risks encoding — and potentially amplifying — those same imbalances into present-day administrative decisions such as case listing or urgency classification.

Legal Misconduct & Citations (May 2026 Ruling)

Strict Liability for Hallucinations: Following instances where proceedings were delayed by hallucinated precedents from commercial LLMs, the Supreme Court ruled that submitting fake citations constitutes professional misconduct. The ruling was widely understood as a corrective signal to the bar, clarifying that the convenience of generative drafting tools does not dilute an advocate's traditional duty of diligence and candour toward the court.

Accountability Framework: The Court clarified that advocates remain accountable for all AI outputs filed under their signature and cannot transfer professional liability to algorithms. This framework effectively treats an AI drafting tool the same way the profession has long treated a junior associate or research assistant: useful for a first draft, but never a substitute for the signing advocate's independent verification.

The BCI Committee & Sovereign Data Security

Expert Oversight Mandate: Following judicial directives, the Bar Council of India (BCI) formed a regulatory committee of academic lawyers and technical specialists to establish a legal tech code of conduct. The committee's mandate spans both prescriptive guidance — what tools may be used and how — and disciplinary oversight for violations discovered after the fact.

Mitigating Sovereign Risk: Relying on external, public commercial AI platforms creates data privacy risks, potentially exposing draft judgments or confidential records prior to public release. To mitigate these vulnerabilities, the committee recommends private, localized LLMs designed to preserve institutional confidentiality and data security. This recommendation dovetails with a broader global trend among governments and judiciaries toward sovereign or air-gapped AI deployments for sensitive administrative functions, rather than reliance on general-purpose commercial platforms hosted outside the jurisdiction's direct control.

Part III: Process Engineering and Workflow Automation

Systemic technological updates, electronic filing improvements, and automated modules integrated under Phase-III enhance the precision and speed of judicial workflows. These engineering interventions target traditional bottlenecks in document submission, courtroom transcription, and metadata extraction — the unglamorous but essential mechanics that determine how quickly a matter actually reaches a judge's attention.

System Upgrades in Phase-III

Automated Scrutiny: Electronic filing software uses custom machine learning systems developed with IIT Madras to automatically flag structural defects in pleadings before manual registration. This front-loads defect detection to the moment of filing rather than allowing it to surface only after a registry clerk's manual review days or weeks later, compressing what was once a multi-step correction cycle into a near-instantaneous feedback loop for filing advocates.

Digital Courts 2.1: Equipped with state-of-the-art ASR-SHRUTI transcription systems and PANINI formatting scripts to automate judicial dictation tasks and streamline record generation. Real-time transcription of this kind reduces the lag between oral proceedings and the availability of a written record, which in turn accelerates appellate review since a certified transcript need not wait for a stenographer's after-hours dictation.

ICMIS Metadata: Advanced natural language parsers directly extract case profiles, statutory legal provisions, and filing dates from uploaded court materials. Automated metadata extraction of this kind feeds directly back into the NJDG, keeping the national pendency picture current without requiring registry staff to manually re-key information already present in the filed documents.

Comparative Workflow Analysis

Workflow Stage	Traditional Manual Workflow	Phase-III AI-Engineered Workflow	Efficiency Gain & Operational Benefit
Document Filing & Scrutiny	Manual physical inspection by registry staff; days spent identifying formatting defects.	Automated ML scrutiny flags procedural and structural defects instantly upon upload.	Reduces registry processing backlogs and speeds up case registration.
Judicial Transcription	Post-hearing manual dictation or handwritten note transcription by court stenographers.	Real-time speech-to-text via ASR-SHRUTI with PANINI formatting scripts.	Delivers verified transcripts faster, improving record accuracy.
Multilingual Translation	External translation panels taking weeks to translate complex orders into local languages.	SUVAS AI translation engine generating draft vernacular orders within hours.	Enhances access to justice for non-English speaking litigants.
Legal Research & Analytics	Manual searches through physical archives, print reporters, or basic keyword search engines.	SUPACE and LegRAA contextual analysis and automated precedent extraction.	Reduces manual research time for judicial clerks and research assistants.

This comparative view underscores a consistent pattern across all four workflow stages: AI intervention does not eliminate the human role but relocates it. Registry staff move from manually spotting defects to reviewing flagged exceptions; stenographers move from primary transcription to correcting an AI-generated draft; translators move from full translation to certifying AI output; and research assistants move from exhaustive manual search to verifying AI-surfaced precedents. In every instance, the guardrails discussed in the next section preserve a human checkpoint at the final stage of the workflow.

Comprehensive System Guardrails Matrix

Operational Area	Active Tool	Systemic Concern	Mandatory Human Safeguard
Translation	SUVAS Engine	Loss of key statutory legal context	Manual review and certification by desk officers
Research Summary	SUPACE / LegRAA	Unintentional precedent hallucinations	Independent citation checking by judicial clerks
E-Filing Check	IIT-M ML Module	False rejects due to system classification errors	Access to manual override via Registrar Office
Speech Transcription	ASR-SHRUTI	Misinterpretation of complex local accents	Mandatory manual corrections before judge's signature

The recurring structure of this guardrail's matrix — a specific tool paired with a specific systemic concern and a specific named human safeguard — reflects a risk-management philosophy borrowed from safety-critical engineering disciplines rather than conventional software deployment. Each AI component is treated less as a finished product and more as a probabilistic assistant whose output requires a designated human checkpoint before it acquires legal effect, whether that checkpoint is a desk officer's certification, a clerk's independent citation check, a Registrar's manual override, or a judge's final signature.

Philosophical, Constitutional, and Comparative Perspectives

The Constitutional Mandate: Article 21 and Due Process

The adoption of AI in court proceedings intersects directly with fundamental constitutional rights under the Constitution of India. Article 21 guarantees the right to life and personal liberty, which the Supreme Court has interpreted to include the right to a fair, speedy, and transparent trial. Any technology introduced into the judicial process must therefore be evaluated not merely on efficiency grounds but against this constitutional baseline: a faster process that compromises fairness or transparency would not satisfy Article 21, however impressive its throughput gains.

Procedural Transparency and Open Justice: The deployment of transcription systems (like ASR-SHRUTI) and judgment translation tools (like SUVAS) advances open justice by making proceedings understandable to all citizens. However, procedural fairness demands that litigants retain the right to contest AI-generated summaries, challenge translation errors, or audit algorithmic case-scheduling decisions. Open justice, in other words, is not satisfied merely by producing more accessible outputs; it further requires a visible and usable mechanism through which those outputs can be questioned.

The Right to a Human Decision-Maker: While algorithmic systems can process legal data, judicial decision-making requires moral reasoning, contextual empathy, and constitutional balancing. Natural justice requires that litigants have their cases heard and evaluated by a human judge. This principle is the philosophical anchor underlying every guardrail discussed in this paper — it explains why SUPACE surfaces precedent rather than ranking outcomes, why SUVAS drafts translations rather than authoritative orders, and why the May 2026 ruling insists that liability for AI-assisted filings cannot be displaced onto the tool itself.

Comparative Global Jurisprudence

India's cautious, assistive approach aligns with emerging international standards for AI in legal systems:

- European Union (EU AI Act): High-risk classifications apply to AI systems used in administration of justice and legal interpretation, requiring strict transparency, human oversight, and data governance standards.
- United States Jurisdiction: Federal and state courts have issued targeted administrative orders requiring attorneys to certify that any research generated using AI tools was verified against official legal reporters.
- The Indian Model: India's framework balances rapid digital adoption with institutional boundaries, embedding 'human-in-the-loop' safeguards across all AI deployments.

Read side by side, these three approaches converge on a shared insight even though they emerge from distinct legal traditions: the EU's risk-classification model, the U.S. courts' certification orders, and India's assistive-tool architecture each attempt, through different instruments, to keep a human professional accountable for any AI-influenced output that ultimately affects a litigant's rights. India's contribution to this comparative conversation lies in its scale and linguistic complexity — few other jurisdictions must simultaneously manage AI deployment across dozens of languages, a federal structure spanning district to Supreme Court, and one of the largest case backlogs in the world.

Conclusion and Future Directions

The integration of artificial intelligence into the Indian judiciary marks a transformative era that balances technological efficiency with institutional caution. While frameworks like SUVAS, SUPACE, and LegRAA, alongside advanced Phase-III process engineering, offer practical solutions to court backlogs, they operate under strict administrative boundaries. The judiciary's proactive stance on professional accountability regarding LLM hallucinations and sovereign data security ensures that technology remains an instrument of justice rather than a substitute for judicial reasoning.

Looking ahead, the successful evolution of AI in the courts will depend on continuous capacity building, regular ethical audits, and ongoing collaboration between legal professionals and technology experts. Training programmes for judicial officers, registry staff, and the bar will need to keep pace with each new tool introduced under Phase-III, ensuring that human safeguards remain meaningful rather than perfunctory. Periodic, independent audits of tools such as SUPACE and ASR-SHRUTI will be necessary to detect drift in accuracy or bias as underlying case-law and language patterns evolve. And sustained dialogue between the judiciary, the Bar Council, and technical institutions such as IIT Madras and NIC Pune will be essential to ensure that future deployments remain grounded in both engineering feasibility and constitutional principle.

By upholding constitutional principles and maintaining human oversight, the Indian judiciary provides a model for modernizing legal administration while safeguarding institutional integrity. As Phase-III matures and future phases are contemplated, the central challenge will not be whether AI can further accelerate case disposal — the productivity gains already evident in translation, transcription, and research suggest that it can — but whether the human safeguards documented throughout this paper can scale proportionately with adoption, so that speed is never purchased at the cost of the fairness Article 21 demands.

"Technology is an aid, not a replacement. Human reasoning, judicial empathy, and absolute accountability must remain central to the Indian justice delivery system." — Dr. Rajwantsingh Kadamb, N.C. Law College, Nanded

Acknowledgment
I would like to express my sincere gratitude to all those who contributed to the completion of this research paper, "AI in Indian Judiciary: A Comprehensive Study Evaluating Operational Deployments, Administrative Obstacles, and Supreme Court Directives." I am deeply thankful to the academic and professional community whose knowledge, guidance, and support helped me examine the evolving role of Artificial Intelligence in the Indian judicial system.

Financial support and sponsorship
Nil.

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

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Manuscript ID
TIJCMBLIR-2026-030433

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 20 July 2026

Revised: 28 July 2026

Accepted: 17 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22122778

DOI Link:
https://doi.org/10.5281/zenodo.22122778

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Custodial Violence – A Blemish on the Judicial System of Largest Democracy of the World

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Abstract
As lack of separate legislation in India, we have to depend on scattered provisions. The National Human Rights Commission (NHRC) took suo motu cognizance in 17 cases of alleged human rights violations reported by media during May, 2018 and issued notices to the concerned authorities for reports. Incitement of criminal offenses, court contempt, honor and harm, decency, morality, public order, national security, and India's sovereignty and integrity are among the grounds on which Article 19(2) permits restrictions. These restrictions, which aim to balance individual freedom with collective well-being, underscore the difficulty of media regulation. By recognizing the potential for abuse and considering the press as a safeguard for democracy, the authors of the Constitution have discovered a system that seeks to improve the balance. the media as aims to improve balance, recognizes the possibility of abuse, and serves as a safeguard for democracy. The extensive spectrum of Police brutality that occurred during the 1975–1977 emergency was noted by the Shah Commission (1978). Due to their lack of accountability to any public authority, the Commission brought the government's attention to the actions of the police during the emergency. The National Police Commission (1979–81), among other reports, carried out a comprehensive examination of the issues pertaining to police operations. conducted a thorough analysis of the problems surrounding police operations. The Commission noted in its initial report the reasons behind administrative torture in India.

Keywords*: Custodial violence, Freedom of speech and expression, National Human Rights Commission (NHRC), Rights of prisoners, Separate Legislation.*

Introduction

If we turn the pages of the history of India, we find that India is a land of diversity. India is diversified because of the invasion of various rulers and India itself has the various history of the several customs and traditions that are followed from generation to generation. Every state has its own cultural history which can be classified into – linguistic, way of dressing, way of worshipping the customs and traditions of marriages to be followed. In-short we can say that India has a very great and diversified history in all sense. It's been said and believed by various Philosophers that Indians are very tolerant in nature so it's easy for invaders to invade and rule for a longer time, and if we turn the pages of our history, we find that this belief of many had proven true. It was found in some cases that the Invaders and Rulers of India had forced the Indian people to follow their customs or traditions compelledly. To rule the people and for the smooth running of the administration of the kingdom the rules and the laws are required. Every ruler has its own rules and laws to run the administration and maintain the justice amongst the people It's being said that in - order to avoid injustice and smooth running of the administration the country, state, kingdom needed to have its own judicial system. India before Independence or before being a democratic nation several punishments are prescribed by the Dharma Shastra, including dipping the hands and feet in boiling oil, cutting the hands, and putting molten lead in the ears. In ancient India, the police force was one of the most important administrative institutions since it was the responsibility of the state to uphold law and order, protect its citizens by discouraging criminal activity, and prevent evildoers from committing crimes as stated by Yajnavalkya. Yajnavalkya's detection of crimes and arrest of the suspicious, protection of the civil population, and prevention of illegal acts were the basic functions of the police. Indian police have been using violent tactics since the Vedic period of Indian history, so this is not a new development. Indian police have been using violent tactics since the Vedic era of Indian history, so it is not a new phenomenon. It originates from the Vedic period of Indian history. Although the practice of brutal measures by Indian police during the Vedic period dates to the earliest Vedic period of Indian history, it is not a recent development.

How to Cite this Article:
Patil, P., & Dongare, M. (2026). Custodial Violence – A Blemish on the Judicial System of Largest Democracy of the World. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 176–179. https://doi.org/10.5281/zenodo.22122778

The practice of brutal measures by Indian police is not a new phenomenon, albeit it can be traced to the earliest Vedic period of Indian history. At that time, it was popular to experience things like fire, water, poison, rice grains, fountains, cheese, etc. At that time, it was popular to experience things like fire, water, poison, rice grains, fountains, cheese, etc., during during that time. The Manu Smriti, Yagnakaya, Brihaspati, Narada, Kautilya, and Gautama Smritis all make mention of torture and harsh punishment. punishment in the Manusmriti, Gautama Smriti, Yajnavalkya, Brihaspati, Narada, and Kautilya texts. Yajnavalkya, Brihaspati, Narada, Kautilya, Gautama Smritis, and Manusmriti., Yajnavalkya, Brihaspati, Narada, Kautilya and Gautama Smritis. Dandin makes mention of death by torture. The jailor Kantaka on one occasion asked a thief to restore his stealing's to the citizens, failing which he would suffer the eighteen tortures one after another till death. In the Junagadh copper plate inscription, there is a mention of over-torture. Limb mutilation seems to be the most prevalent practice. appears to be the most common practice. Manu and Narada stated that eight choices could be made for infliction. The tongue, the two hands, the two feet, the eyes, the nose, and the two ears are among them. the two ears and the nose. injury, including the tongue, the abdomen, the two hands, the two feet, the eyes, the nose, and the two ears, as well as the privy parts. the tongue, the two hands, the two feet, the eyes, the nose, and the two ears the inhumane practice of thrusting a red-hot iron into a criminal's mouth and pouring hot oil into their ears and throat was mentioned by Narada. to the cruel custom of forcing a red-hot iron into a criminal's mouth and slathering hot oil into their ears and throat. the throat, ears, and mouth of a criminal who has been given a death sentence. striking a criminal who has been given a death sentence with a red-hot iron in the mouth, as well as the throat and ears. putting a fiery iron in a criminal's mouth and sticking it in his ears. -hot iron into the mouth of a criminal who has been given a death sentence. In his Arthasastra, Kautilya noted that the punishment must be determined by taking into account the offender's strength, age, conduct, earning capacity, financial situation, torment, and the type of offense committed. Arthasastra observed that awarding of punishment must be regulated by consideration of the torture and nature of the offence, time and place, strength, age, conduct, earning and monetary position of the offender. He suggested using eighteen different forms of torture to get the accused to divulge information. of torture to elicit information from the accused. "Those whose guilt is determined to be probable will be tortured." whose guilt is found to be probable shall be subjected to torture. Torture can be inflicted collectively, individually, or repeatedly in the case of a former criminal who retracts after confessing, with whom some of the stolen goods are discovered, who is arrested for the act or the article, who tries to take the ruler's treasury, or who is to be tortured to death at the ruler's command. retracts, with whom a part of the stolen goods is found, who is arrested because of the act or with the article, who attempts to seize the ruler's treasury or who is to be killed by torture at the ruler's order.

The British discovered that torture by officials, including Kotwals, was common during their early years of rule, eventually leading to deaths. After considering the frequent use of torture, the Select Committee on East Indian Affairs (1832) concluded that "there is ample evidence that colonial administration was aware of excessive pain by revenue and police officials used purposely to extort confessions, money, or taxes" (Rao 2004). The British government established the Torture Commission in 1855 to investigate claims of torture during the Madras Presidency in Its report made clear how common police torture was during the Madras Presidency. "Torture" is defined by the Torture Commission as "pain used to punish guilt or coerce a confession." Instead of focusing on isolated, exceptional cases, the report highlighted the systemic issue of torture in policing. The torture commission's recommendation served as the cornerstone for the creation of the Police Commission in 1860. To examine the performance and operational procedures of the State Police in the 1950s, 1960s, early 1970s, and 1980s, the Union and State Governments appointed a few Police Commissions after independence.

The extensive spectrum of Police brutality that occurred during the 1975–1977 emergency was noted by the Shah Commission (1978). Due to their lack of accountability to any public authority, the Commission brought the government's attention to the actions of the police during the emergency. The National Police Commission (1979–81), among other reports, carried out a comprehensive examination of the issues pertaining to police operations. conducted a thorough analysis of the problems surrounding police operations. The Commission noted in its initial report the reasons behind administrative torture in India. Nirabati Behera against Odisha, 1993: The Supreme Court finds that the victim is breached while in custody. He was liable for compensation to the state and awarded Rs. 1.55,000. D.K. BASU against West Bengal in 1997: The Supreme Court recognized police violence and atrocities as an attack on human dignity. The court determined 11 guidelines to be observed during the arrest and provided to those arrested. Nine policemen in India were recently punished for custodial torture in two major cases: the 2020 Sattankulam father-son deaths in Tamil Nadu (where all nine officers received the death penalty in April 2026), and the 2011 Washim case in Maharashtra (where nine policemen were sentenced to life imprisonment in July 2026). These verdicts are rare but significant, showing growing judicial intolerance toward custodial violence. Victims: P. Jayaraj (58) and his son J. Benicks (31).

Incident: Arrested in June 2020 for allegedly violating COVID-19 lockdown norms by keeping their shop open.

Abuse: Brutally tortured overnight at Sattankulam police station. Outcome: Both died in custody (Benicks

on June 22, Jayaraj on June 23). Verdict: On April 6, 2026, the Madurai court sentenced nine policemen to death, calling it a "rarest of rare" case. Convicted Officers: Inspector S. Sridhar, Sub-Inspectors P. Raghu Ganesh & K. Balakrishnan, Head Constables S. Murugan & A. Saamidurai, Constables M. Muthuraj, S. Chelladurai, X. Thomas Francis, and S. Veilumuthu. Significance: First time such a large group of policemen received the death penalty for custodial torture.

Washim Custodial Death (Maharashtra, 2011) Victim: Benya Pawar, a 23-year-old from the Pardhi community. Incident: Picked up by Risod police in May 2011, allegedly beaten inside the station. Outcome: Died in custody with multiple fractures. Verdict: On July 3, 2026, Washim District Court sentenced nine policemen to life imprisonment after a 15-year trial. Convicted Officers: Included then Station House Officer Mahadev Manik Dhande and eight others.

Significance: A landmark ruling for marginalized communities, showing persistence of families in fighting long legal battles

One of the main reasons may be because of the lack of legal awareness in the country. Police officers aren't scared to be stuck in action because of flaws in the system. Thus, you can proceed to extract information in violent ways and your rights will be sacrificed if they are not legally recognized. Police trust the victims to continue using violent methods to deal with them because they do not recognize their rights. Another reason is improper training. Officers are not adequately prepared to handle.

It's been said by the Martin Luther King, Jr. – "-Injustice anywhere is a threat to justice everywhere. We are caught in an inescapable network of mutuality, tied in a single garment of destiny. Whatever affects one directly, affects all indirectly."[1] If talking about the modern era we found that use of abuse of powers is increasing day by day in India. India being the Democratic country following adversarial justice system is the signatory of UNCAT but the ractification of convention has not taken place though decade passed. Prevention of Anti Torture Bill,2010 was introduced in Lok Sabha on 26/04/2010 and was passed by Lok Sabha on 06/05/2010. But still, there is no separate legislation Regarding custodial violence formed in India. Though there are lots of scattered legal provisions in various laws for anti-torture activities for custodials but still the cases of custodial violence are increasing day-by-day. So, there is a need of Separate Legislation. Human rights and significant demographic realities of society are not well understood by Indian police personnel. Actually, 12 percent of police officers have never received training on human rights and contemporary ideas of judicial justice that are effective in India. Employees can therefore determine which behavioral change measures are required and reorganize them for early-stage sensitivity training using an independent mechanism. No state has complied with the Supreme Court's guidelines for the establishment of police complaints under Prakash Singh v. Union of India (2006). Police overload can be caused by a variety of factors, including political pressure, low pay, long police hours, and physical and mental stress. This is only feasible if the government implements the curative police reforms that the Indian Constitution promises to protect the lives, security, and dignity of all citizens at all levels though they may be in prison. The Bill should be passed and separate legislation is required for the Custodial Torture. Only Media can pen by rising voice in the words of prisoners. The cases of custodial torture which were focused till now was due to only and only 'media' and hence the role of Media is important. This chapter speaks about that there should be separate legislation for Custodial Torture and the voice of the inmates should be made vocal by media. Custodial violence persists because laws exist but enforcement is weak. Real change requires political will, independent oversight, and a shift in police culture from coercion to service. Without accountability, even strong laws remain ineffective.

Legal & Judicial Framework

- **Strict Enforcement of D.K. Basu Guidelines (1997)**: Arrest memos, medical checks, and informing relatives must be made non-negotiable.
- **Mandatory CCTV & Audio-Video Recording**: Every police station and interrogation room should have functioning surveillance, with footage stored securely.
- **Fast-Track Custodial Violence Courts**: Special courts to handle custodial death/torture cases within 6–12 months.
- **Independent Complaints Authorities**: As recommended in *Prakash Singh v. Union of India (2006)*, to investigate police misconduct without political interference

Conclusion

This article will aid in understanding the issues surrounding prisoners' rights. Equal opportunities and rights should be granted to prisoners in accordance with human rights. Prisoners' human rights must be upheld and supported. Custodial torture in India is a critical issue that has been addressed through various judicial pronouncements and legal frameworks. Prisoners have the right to care, protection, development, and rehabilitation. As a result, every prisoner is accorded human rights and treatment under the Indian Constitution. Despite these legal safeguards, custodial torture remains a systemic issue, with calls for stronger anti-torture laws and better implementation of existing provisions.

Acknowledgment
The authors express their sincere gratitude to the principal and faculty members of S.P. College of Law, Gondwana University, Gadchiroli, Maharashtra, for their valuable support and encouragement during the preparation of this research paper on custodial violence.

Financial support and sponsorship
Nil.

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

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Manuscript ID:
TIJCMBLIR-2026-030434

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 20 July 2026

Revised: 28 July 2026

Accepted: 17 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22172894

DOI Link:
https://doi.org/10.5281/zenodo.22172894





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Artificial Intelligence Meets Emotional Intelligence Transforming Teacher Education for The Further Future

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Abstract
Artificial Intelligence (AI) is rapidly transforming education by introducing intelligent technologies that support personalized learning, automated assessment, learning analytics, and data-driven decision-making. While these advancements have enhanced the efficiency and accessibility of educational practices, they cannot replace the human qualities that are fundamental to effective teaching, such as empathy, emotional awareness, ethical judgment, communication, and interpersonal relationships. Emotional Intelligence (EI), defined as the ability to recognize, understand, regulate, and manage emotions in oneself and others, remains an essential competency for teachers in creating positive, inclusive, and learner-centered classrooms. The convergence of AI and EI has therefore emerged as a critical area of interest in teacher education, where technological innovation must be balanced with human values and emotional competence. This conceptual research paper explores how the integration of Artificial Intelligence and Emotional Intelligence can transform teacher education to meet the demands of future educational systems. It examines the complementary roles of AI and EI in enhancing teacher effectiveness, professional development, classroom management, student engagement, and personalized learning experiences. The paper reviews contemporary literature on AI-enabled educational technologies and emotional competencies required for effective teaching, highlighting the opportunities, challenges, ethical considerations, and implications of integrating these two domains. Furthermore, it proposes strategies for redesigning teacher education curricula through AI literacy, digital pedagogical skills, emotional intelligence training, reflective practices, ethical AI usage, and continuous professional development. The study argues that future-ready teachers should possess not only technological proficiency but also strong emotional and social competencies that enable them to respond to the diverse academic, psychological, and socio-emotional needs of learners. AI should be viewed as a supportive educational partner that enhances instructional practices rather than replacing teachers' professional expertise and emotional capabilities. The paper concludes that the successful transformation of teacher education depends on developing educators who can effectively combine intelligent technologies with emotional competence, ethical responsibility, and human-centered pedagogy. Such an integrated approach will foster resilient, innovative, and compassionate teachers capable of preparing students for the challenges and opportunities of the twenty-first century. The findings provide valuable insights for teacher educators, curriculum developers, policymakers, and educational institutions seeking to create sustainable, inclusive, and technologically enriched teacher education programs.

Keywords: *Artificial Intelligence (AI), Emotional Intelligence (EI), Teacher Education, Future-Ready Teachers, AI Literacy, Digital Pedagogy, Ethical AI, Human-Centred Education, Personalized Learning, Educational Transformation.*

Introduction

Education is experiencing a profound transformation as Artificial Intelligence (AI) continues to reshape teaching, learning, assessment, and educational decision-making. The growing integration of AI into educational systems has created new opportunities for personalized learning, intelligent instructional support, and data-driven educational practices.

How to Cite this Article:
Pawar, S. P., & B, P. P. (2026). Artificial Intelligence Meets Emotional Intelligence Transforming Teacher Education for The Further Future. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 180–183. https://doi.org/10.5281/zenodo.22172894

However, effective teaching extends beyond technological innovation and requires emotional understanding, empathy, ethical responsibility, and meaningful human interaction. In this context, Emotional Intelligence (EI) plays a crucial role in preparing teachers to respond to the diverse academic, social, and emotional needs of learners.

The integration of Artificial Intelligence and Emotional Intelligence offers a balanced and human-centered approach to transforming teacher education for the future. This paper explores how the convergence of AI and EI can prepare future-ready teachers capable of meeting the evolving demands of twenty-first-century education.

Need and Significance of the Study:

The growing adoption of Artificial Intelligence (AI) in education is transforming teaching, learning, and educational decision-making. However, effective education requires not only technological advancement but also emotional understanding, ethical responsibility, and meaningful human interaction. Emotional Intelligence (EI) enables teachers to create supportive, inclusive, and learner-centred classrooms while responding effectively to students' diverse needs. Therefore, integrating AI with EI has become essential for preparing future-ready teachers. This study highlights the significance of combining technological innovation with emotional intelligence in teacher education and provides insights for developing teacher education programmes that promote effective teaching, holistic student development, and sustainable educational transformation in the digital era.

Objectives of the Study

- To critically examine the transformative potential of Artificial Intelligence in reshaping teacher education.
- To explore the role of Emotional Intelligence in fostering effective, ethical, and learner-centred teaching practices.
- To analyse the synergistic relationship between Artificial Intelligence and Emotional Intelligence in preparing future-ready educators.
- To identify the opportunities, challenges, and ethical dimensions associated with integrating Artificial Intelligence and Emotional Intelligence in teacher education.
- To propose a human-centred framework for integrating Artificial Intelligence and Emotional Intelligence to strengthen teacher education and promote sustainable educational transformation.

Research Methodology

The present study adopts a conceptual and descriptive research design based on a comprehensive review of existing literature. Relevant books, peer-reviewed research articles, policy documents, reports, and scholarly publications related to Artificial Intelligence, Emotional Intelligence, and teacher education were critically reviewed and analysed to understand the significance of integrating AI and EI in transforming teacher education for the future.

Data Collection Procedure

. The study is based entirely on secondary data. Data were collected from authentic academic sources, including peer-reviewed journals, books, conference proceedings, government reports, policy documents, and international publications. The collected literature was systematically reviewed, compared, and synthesized to identify major themes, emerging trends, opportunities, and challenges related to the integration of Artificial Intelligence and Emotional Intelligence in teacher education.

Discussion

The review of existing literature indicates that Artificial Intelligence (AI) has become a transformative force in education by improving personalized learning, intelligent assessment, instructional planning, and educational decision-making. AI-driven technologies enable teachers to access data-informed insights, automate routine tasks, and provide customized learning experiences. These advancements contribute to greater efficiency and innovation in teaching; however, they cannot replicate the human qualities that are fundamental to effective education.

The literature consistently emphasizes that Emotional Intelligence (EI) remains indispensable in teacher education. Teachers with high emotional intelligence are better equipped to understand learners' emotional needs, build positive teacher–student relationships, manage classroom challenges, and create inclusive learning environments. Empathy, emotional regulation, communication, and ethical decision-making continue to distinguish effective teaching from technological automation. The convergence of Artificial Intelligence and Emotional Intelligence presents a balanced and future-oriented approach to teacher education. Rather than functioning as competing concepts, AI and EI complement one another by combining technological capabilities with human values. AI supports teachers through intelligent tools and data-driven insights, while EI enables teachers to apply these technologies with empathy, ethical responsibility, and professional judgment. Such integration strengthens teaching effectiveness, enhances student engagement, and promotes holistic learning experiences.

The discussion further suggests that teacher education programmes should move beyond developing digital literacy alone and emphasize the integration of AI knowledge with emotional and ethical competencies. Future teachers must be prepared to use AI responsibly while maintaining meaningful human interactions that support learners' academic, social, and emotional development. Therefore, integrating Artificial Intelligence and Emotional Intelligence represents a significant step toward transforming teacher education and preparing educators for the evolving demands of twenty-first-century education.

Future Scope

This conceptual study lays the groundwork for integrating Artificial Intelligence (AI) and Emotional Intelligence (EI) in teacher education. Future research should empirically test these ideas across diverse

contexts and examine their impact on teacher competencies, professional development, learner engagement, and educational outcomes. Further work may also explore emerging AI technologies, ethical practices, curriculum innovation, and teacher education programmes. Such studies will support the development of more innovative, inclusive, human-centred, and sustainable education systems for the twenty-first century.

Findings

- Artificial Intelligence (AI) is transforming teacher education by enhancing personalized learning, intelligent instructional support, adaptive assessment, and evidence-based educational decision-making.
- Emotional Intelligence (EI) remains a fundamental competency for effective teaching, enabling teachers to foster empathy, ethical decision-making, emotional regulation, effective communication, and meaningful teacher–student relationships.
- The integration of Artificial Intelligence and Emotional Intelligence provides a balanced and human-centred approach to teacher education by combining technological innovation with emotional, ethical, and pedagogical competencies.
- The literature highlights the need to redesign teacher education programmes by integrating AI literacy, Emotional Intelligence, digital pedagogy, and ethical AI practices to prepare competent and future-ready educators.
- Overall, the integration of Artificial Intelligence and Emotional Intelligence has the potential to transform teacher education by promoting innovative, inclusive, sustainable, and learner-centred educational practices while equipping teachers to meet the evolving demands of twenty-first-century education.

Financial support and sponsorship
Nil.

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

Acknowledgment
The authors express their sincere gratitude to all those who contributed directly or indirectly to the completion of this research paper. We are especially thankful to the Department of Education, Dr. Babasaheb Ambedkar Marathwada University, Chhatrapati Sambhajinagar, Maharashtra, for providing the academic environment and support necessary for pursuing this study.

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Manuscript ID:
TIJCMBLIR-2026-030435

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29 July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22122911

DOI Link:
https://doi.org/10.5281/zenodo.22122911

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Access To Justice in Copyright Law Before the High Court of Karnataka (2015-2025): An Empirical Survey with Special Reference to Authors' Rights

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Abstract
This paper presents an empirical survey of Copyright litigation before the High Court of Karnataka (Bengaluru, Dharwad and Kalaburagi Benches) between 2015 and 2025. Drawing on judgments retrieved from official and open-access sources, the study maps the volume, procedural routes (civil and criminal), and outcomes of cases, coding them as Prevailed, Denied or Settled from the perspective of rights-holders. Special reference is given to Authors' Rights cases involving moral rights under Section 57 of the Copyright Act, 1957, literary works by named authors, and the performing rights of authors and composers administered through societies such as the Indian Performing Right Society (IPRS). The analysis also examines the discoverability and accessibility of these judgments, thereby integrating a Library and Information Science perspective on access to legal information. Findings indicate a high rate of settlement in criminal Copyright prosecutions, consistent judicial resistance to the misuse of the Copyright Act for trademark-type disputes, and a protective approach toward authors' moral and performing rights where such claims are clearly raised. The relative scarcity of pure Authors' Rights litigation reaching the High Court is itself noted as a significant observation. The study contributes to the limited empirical literature on regional High Court copyright adjudication in India and offers practical insights for researchers, practitioners, authors and legal information professionals.

Keywords: *Copyright Law; Authors' Rights; Moral Rights (Section 57); High Court of Karnataka; Empirical Survey; Access to Justice; Judgment Discoverability; Library and Information Science; Intellectual Property Litigation; India*

Introduction and Research Gap

Access to justice in intellectual property matters is not merely a question of substantive doctrine; it is equally a question of how rights are invoked, adjudicated and made knowable to those who hold them. In India, the Copyright Act, 1957 remains the principal statute governing literary, dramatic, musical and artistic works, as well as cinematograph films and sound recordings. Within this framework, the special rights of authors under Section 57, the rights to claim authorship and to object to distortions prejudicial to honour or reputation occupy a distinctive place. These moral rights survive assignment of the economic copyright and reflect the personality interest of the creator. Despite the doctrinal richness of Indian copyright jurisprudence, systematic empirical studies of how High Courts actually decide Copyright cases over a sustained period remain scarce. Most existing literature is either doctrinal (focusing on landmark Supreme Court or Delhi High Court decisions on moral rights) or limited to jurimetric analyses of Supreme Court judgments. Regional High Court practice, particularly outside the major metropolitan commercial centres, has received far less systematic attention. The High Court of Karnataka, with its three Benches at Bengaluru, Dharwad and Kalaburagi, offers a useful site for such an inquiry: it combines a significant volume of commercial and criminal litigation with a cultural context in which literary and musical authorship (especially in Kannada) carries particular resonance. Existing empirical work on Indian copyright adjudication has concentrated almost exclusively on the Supreme Court. A notable example is the jurimetrics study by Rajkumar and Suresh (2022), which analysed Supreme Court judgments on copyright spanning several decades. Doctrinal scholarship on moral rights under Section 57 is relatively well developed, with landmark decisions such as Amar Nath Sehgal v. Union of India frequently discussed. However, systematic, decade-long empirical surveys of Copyright litigation at the High Court level, particularly with special reference to Authors' Rights and an assessment of judgment. Discove rability from a Library and Information Science standpoint remain scarce.

How to Cite this Article:
Jamadar, A. G. (2026). Access To Justice in Copyright Law Before the High Court of Karnataka (2015–2025): An Empirical Survey with Special Reference to Authors' Rights. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 184–188. https://doi.org/10.5281/zenodo.22122911

Its primary aim is to map the nature of the cases, the procedural routes employed, and the outcomes from the standpoint of rights-holders coded consistently as PREVAILED, DENIED or SETTLED. Special reference is given to those relatively few cases that turn on Authors' Rights in the stricter sense: moral rights under Section 57, literary works by named authors, and the collective enforcement of authors' and composers' performing rights. A secondary but integral Library and Information Science lens examines how discoverable and accessible these judgments are, recognising that access to the law itself is a precondition of access to justice.

Research Questions

Given the cultural and economic importance of literary and musical authorship in Karnataka, and the protective statutory framework of Section 57 of the Copyright Act, 1957, it was anticipated that a meaningful volume of Authors' Rights litigation (including literary works by named authors and moral-rights claims) would reach the High Court, and that outcomes would frequently favour authors or rights-holders. The following exploratory research questions guided the inquiry:

1. What is the volume, subject-matter profile and temporal distribution of Copyright cases decided by the High Court of Karnataka between 2015 and 2025?
2. In what proportion did rights-holders PREVAIL, face DENIAL, or see matters SETTLED, particularly in civil versus criminal proceedings and in Copyright–Trade Marks boundary cases?
3. How have pure Authors' Rights cases especially those involving moral rights under Section 57, literary works by named authors, and the performing rights of authors and composers fared, and what principles emerge from them?
4. How discoverable and accessible are these judgments from a Library and Information Science perspective, and what does this imply for access to justice?

These questions are exploratory rather than confirmatory. The relative scarcity of pure Authors' Rights cases reaching the High Court is treated as an empirical finding in its own right.

The paper proceeds as follows. Section 2 sets out the methodology. Section 3 presents the overall patterns of Copyright litigation. Section 4 offers a focused analysis of the Authors' Rights cases. Section 5 discusses discoverability and information access. Section 6 draws implications for access to justice and concludes.

Methodology

This study undertakes a systematic empirical survey of Copyright litigation decided by the High Court of Karnataka between 1 January 2015 and 31 December 2025. The geographical scope covers all three Benches of the Court Bengaluru, Dharwad and Kalaburagi. The temporal window of a full decade was chosen to capture both pre- and post-2012 Amendment trends while remaining manageable for detailed coding.

Search Strategy

A multi-source retrieval approach was adopted. Primary free-access sources were Indian Kanoon and the official judgment repository of the High Court of Karnataka. These were supplemented by Case Mine, Live Law and other reliable secondary reports. Search strings combined statutory terms ("Copyright Act", "section 51", "section 63", "section 57", "author's special rights", "moral rights") with institutional and subject descriptors ("High Court of Karnataka", "Dharwad Bench", "IPRS", "literary work", "claim authorship"). Results were cross-checked across platforms to minimize omission.

Screening and Inclusion

All retrieved items underwent two-stage screening. In the first stage, titles and headnotes were examined to eliminate clearly irrelevant matters (for example, pure trademark, patent or service-matter cases that merely mentioned the word "copyright" in passing). In the second stage, full texts or detailed summaries were read to confirm that issues arising under the Copyright Act, 1957 formed a material part of the decision. Boundary cases in which the Court was required to decide whether the facts attracted the Copyright Act or the Trade Marks Act, 1999 were retained, because they illuminate the practical operation of Copyright enforcement.

Coding Framework

Each included case was coded on a structured spreadsheet (the research instrument accompanying this study) for the following variables: Bench and year; Civil or criminal character; Subject category (Authors' Rights / moral rights, literary work, performing rights, criminal enforcement, Copyright–Trade Marks boundary, registration/procedural, other); Outcome from the perspective of the rights-holder or author, classified As Prevailed, Denied, Settled, Or Mixed/Pending; Strength of Authors' Rights involvement (Pure / Strong / Borderline / None); Presence of Section 57 issues; and Discoverability score (1–5) based on ease of retrieval and completeness of publicly available text.

The outcome coding was applied consistently: PREVAILED indicates that the author or rights-holder substantially succeeded on the copyright claim; DENIED indicates that the copyright claim failed or the accused succeeded in having charges quashed or an acquittal recorded; SETTLED covers matters disposed of by compounding, joint memo or amicable settlement without a full merit's decision.

Special Focus and LIS Dimension

Particular analytical attention was paid to the small subset of cases that engage Authors' Rights in the stricter sense moral rights under Section 57, literary works by named authors, and the collective enforcement of authors' and composers' performing rights through societies such as the Indian Performing Right Society (IPRS). A secondary but integral lens examined the discoverability and accessibility of the judgments themselves. Each case was scored for the ease with which a researcher relying primarily on free public sources could locate the full text or a reliable headnote. This dimension speaks directly to access to legal information as a precondition of access to justice.

Limitations

The study acknowledges the usual constraints of open-source legal research in India: incomplete digitisation

of older records, occasional gaps in official reporting, and the impossibility of capturing every unreported or purely interlocutory order. The relative scarcity of pure Authors' Rights cases reaching the High Court is treated as a finding rather than a defect of method. All claims in the paper are traceable to the coded dataset. The coding spreadsheet that forms the empirical backbone of this study is available as a supplementary research instrument.

Overall Patterns of Copyright Litigation (2015–2025)

The coded dataset, though modest in size, reveals several consistent patterns in the way Copyright matters reach and are disposed of by the High Court of Karnataka.

Procedural Routes

A clear majority of the cases that reached the High Court were criminal in origin, petitions under Section 482 of the Code of Criminal Procedure (or its successor provision under the Bharatiya Nagarik Suraksha Sanhita) seeking quashing of FIRs or charge-sheets registered under Sections 51 and 63 of the Copyright Act, 1957. Civil proceedings (miscellaneous first appeals, civil revision petitions and writ petitions) formed a smaller but doctrinally significant group. This distribution reflects the continued reliance on the criminal process as a primary enforcement tool for copyright owners in Karnataka.

Outcome Patterns

Three broad outcome clusters emerge. SETTLED (approximately 30%): A substantial proportion of the criminal petitions ended in compounding or amicable settlement. Typical examples include Chetan Kothari, Sri Ganesh Video and the Ola/ANI Technologies matter. In each instance the High Court quashed the proceedings once the parties placed a joint memo or settlement affidavit on record. This pattern suggests that the criminal process often functions less as a vehicle for full adjudication on merits and more as a pressure mechanism that is later resolved privately.

DENIED to the Copyright claim (approximately 30%): In a distinct subset of cases the Court held that the facts did not attract the Copyright Act at all. The most instructive decisions are Sri Raghunath Ananda Rokhade v. State of Karnataka (Dharwad Bench, 2025) and Vishal Vrushabhanaath Samaje (Bengaluru, 2026). Both concerned the sale of counterfeit branded goods. The Court consistently ruled that such allegations fall under the Trade Marks Act, 1999 and that the mandatory safeguards of that statute cannot be bypassed by registering an FIR under the Copyright Act. A third case, Basavaraj Degul (Dharwad Bench), resulted in acquittal on the Copyright counts. These decisions demonstrate a firm judicial resistance to the instrumental use of Copyright law for trademark-type grievances. PREVAILED (approximately 20%): Where genuine authors' or rights-holders' claims were properly framed, the Court showed a willingness to grant relief. The two clearest examples belong to the special-reference subset discussed in Section 4 below.

MIXED / PENDING (approximately 20%): Two matters remain at an interlocutory or procedural stage: one concerning rectification of the Copyright Register and the other an interim stay in favour of an e-commerce intermediary in a literary-work piracy allegation.

Table 1. Outcome Distribution of Coded Copyright Cases (High Court of Karnataka, 2015–2025)

Outcome Code	Number	Approx. %	Illustrative Examples
PREVAILED	2	20%	Saavn Media v. Hamsalekha (s. 57); IPRS v. Antardhwani
DENIED (to Copyright claim)	3	30%	Raghunath Rokhade; Vishal Vrushabhanaath Samaje; Basavaraj Degul
SETTLED	3	30%	Chetan Kothari; Sri Ganesh Video; Ola / ANI Technologies
MIXED / PENDING	2	20%	Karthikeyan Manishekar (registration); Amazon / Ravi Belagere (interim)

Bench Distribution

The overwhelming majority of the coded cases originated from the principal Bench at Bengaluru. The Dharwad Bench contributed a smaller but notable number of decisions, particularly the two clear Copyright-versus-Trade-Marks boundary rulings. No Kalaburagi Bench decision of comparable significance was located within the search parameters. This distribution mirrors the concentration of commercial and entertainment-related litigation in Bengaluru.

Taken together, the overall patterns indicate a High Court that is both pragmatic (favouring settlement in criminal matters) and doctrinally careful (refusing to allow the Copyright Act to be used as a shortcut around the Trade Marks Act). The relative rarity of pure Authors' Rights claims reaching the Court is itself a structural finding that frames the analysis in the next section.

Special Reference to Authors' Rights Cases

Although pure Authors' Rights litigation formed only a small fraction of the dataset, the cases that did reach the High Court are doctrinally rich and repay close attention.

Moral Rights under Section 57 – Saavn Media Ltd v. Sri Hamsalekha

This is the clearest and most recent affirmation of authors' special rights by the Karnataka High Court. Sri Hamsalekha, a well-known Kannada lyricist and composer, had sued Saavn Media (JioSaavn) asserting, among other things, his right to claim authorship and proper credit. Saavn sought rejection of the plaint, arguing that the author had assigned his rights to the Indian Performing Right Society (IPRS) and therefore lacked locus standi. Justice C.M. Joshi dismissed the civil revision petition (CRP No. 487 of 2023, decided 8 April 2024, NC: 2024: KHC:14440). The Court held that Section 57 confers special rights on the author independently of the economic copyright. These

include the right to claim authorship of the work and the right to restrain or claim damages for any distortion, mutilation or modification prejudicial to honour or reputation. Assignment of licensing rights to IPRS does not extinguish these moral rights. Section 33, which regulates the business of copyright societies, does not bar an individual author from enforcing moral rights or seeking name credit. The earlier Supreme Court decision in IPRS v. Eastern India Motion Pictures Association does not take away the author's right to claim authorship under Section 57.

The decision is significant for two reasons. First, it confirms that moral rights remain with the author even after assignment to a copyright society. Second, it demonstrates that the Karnataka High Court is prepared to protect the personality interest of creators when the claim is properly framed.

4.2 Performing Rights of Authors and Composers – IPRS v. Antardhwani

IPRS, acting as the registered copyright society representing authors, composers and publishers of musical and literary works, sought temporary injunction against unauthorised public performance of its repertoire. The trial court had declined relief against one of the defendants. The High Court (Justice H.P. Sandesh, MFA No. 3972 of 2021, decided 5 October 2021) allowed the appeal and directed that the injunction application be allowed in its entirety. The decision illustrates the practical utility of collective enforcement mechanisms for authors and composers who would otherwise find individual litigation prohibitively expensive.

4.3 Literary Work of a Named Author – Amazon / Ravi Belagere Matter

An FIR was registered under Sections 51(1)(b) and 63 of the Copyright Act on a complaint by the daughter of the late journalist-author Ravi Belagere, alleging that pirated or heavily discounted copies of his Kannada literary work were being sold on e-commerce platforms. Amazon sought quashing or stay, relying in part on intermediary safe-harbour provisions. The High Court granted an interim stay of further proceedings and issued notice. Although the matter remains pending on merits, it is one of the few pure literary - work cases involving a named regional-language author that has reached the High Court in the decade under study.

Table 2. Pure / Strong Authors' Rights Cases (Special Reference Subset)

Case	Year	Bench	Core Issue	Outcome
Saavn Media Ltd v. Sri Hamsalekha	2024	Bengaluru	Section 57 moral rights / authorship credit	PREVAILED (Author)
IPRS v. Antardhwani	2021	Bengaluru	Performing rights of authors & composers	PREVAILED (Society)
Amazon / Ravi Belagere book	2026	Bengaluru	Literary work of named author	PENDING (interim stay to platform)

Synthesis

Three observations emerge from the special-reference subset. First, when Authors' Rights claims (especially moral rights under Section 57) are clearly pleaded, the Court has shown a protective stance. Second, collective enforcement through IPRS remains an important practical route for authors and composers. Third, pure Authors' Rights cases are still infrequent at the High Court level. The scarcity itself suggests that many authors either settle at earlier stages, lack the resources to litigate, or are unaware of the full scope of their special rights — a point that links directly to the Library and Information Science concerns examined in the next section.

Discoverability and Access to Legal Information: A Library and Information Science Perspective

Access to justice presupposes access to the law itself. From a Library and Information Science standpoint, the present survey examined how readily the judgments under study can be located and used by researchers, practitioners, authors and ordinary citizens who rely primarily on free public sources.

Most of the decisions coded in this study are discoverable through Indian Kanoon and the official High Court judgment portal. Commercial databases generally provide more complete texts, better headnotes and cross-references. Discoverability scores assigned during coding ranged from 3 to 5, with the majority falling in the higher range. Nevertheless, several practical limitations persist: full-text availability for older or less-reported orders is sometimes incomplete; headnotes and metadata quality vary, making subject-based retrieval (especially for moral-rights or literary-work issues) less precise than statutory-section searching; Bench-specific filtering (Dharwad or Kalaburagi) is not always reliable across platforms; and interlocutory and settlement-based orders, which form a large part of the criminal Copyright caseload, are less consistently reported than final judgments.

These observations have direct implications for Authors' Rights. If the very judgments that affirm moral rights under Section 57 or protect literary works are difficult for authors, local practitioners or law-college libraries to locate and understand, the protective potential of those decisions remains under-realised. Improving the quality of free public legal information, clearer metadata, consistent Bench tagging, and better subject indexing of intellectual-property decisions would itself be a contribution to access to justice. The present study's coding spreadsheet, which records sources and discoverability scores for each case, is offered as a transparent research instrument that future workers can extend.

Implications for Access to Justice and Conclusion

Three broader implications emerge from the decade-long survey.

First, the high rate of settlement in criminal Copyright prosecutions suggests that the criminal process frequently operates as a bargaining arena rather than a site of full adjudication. While settlement can be efficient, it also means that many disputes never

generate reasoned judgments that clarify the law for others.

Second, the consistent judicial refusal to allow the Copyright Act to be used as a shortcut around the Trade Marks Act is a positive development for legal certainty. It protects the integrity of both statutes and reduces the risk of over-criminalisation of commercial disputes.

Third, and most relevant to the special focus of this paper, pure Authors' Rights litigation remains relatively rare at the High Court level in Karnataka. When such claims are properly framed, particularly moral rights under Section 57 and collective performing-rights actions, the Court has shown a willingness to protect authors. The scarcity of cases may reflect resource constraints, information asymmetries, or earlier-stage settlements. From an access-to-justice perspective, this points to the need for better legal-information outreach to authors, regional-language writers and local practitioners, as well as continued strengthening of free public judgment databases.

Conclusion

This empirical survey of Copyright litigation before the High Court of Karnataka (2015–2025) has mapped procedural patterns, outcome distributions and the treatment of Authors' Rights. It has documented a protective judicial stance toward moral rights and performing rights where those claims are clearly raised, while also recording the practical dominance of settlement in criminal matters and the firm boundary drawn between Copyright and Trade Marks law. By integrating a Library and Information Science lens on judgment discoverability, the study underscores that access to the decisions themselves is a necessary condition for the realisation of the rights they affirm. The modest size of the pure Authors' Rights subset is itself a finding that invites further research into why so few such cases reach the High Court and how legal-information systems can better serve creators. The coded dataset underlying this paper is made available as a transparent foundation for that future work.

Acknowledgment

The author expresses sincere gratitude to all those who contributed to the completion of this empirical study on access to justice in copyright law before the High Court of Karnataka. Special thanks are extended to the High Court of Karnataka and the various publicly accessible legal information platforms that facilitated the identification and examination of judgments for the period 2015–2025. The study relied particularly on sources such as the official High Court judgment repository and Indian Kanoon, supplemented by other reliable legal databases and reports.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030436

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29 July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22122956

DOI Link:
https://doi.org/10.5281/zenodo.22122956

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From Traditional Banking to Digital Payments: Policy Evolution and Transformation of India's Financial System

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Abstract
India's banking sector has undergone a profound transformation from a fragmented and fragile system in the colonial and early post-independence period to a technologically advanced and digitally driven financial ecosystem. This paper examines the historical evolution of banking in India and analyses how policy interventions have shaped the transition toward digital payment systems, particularly the Unified Payments Interface (UPI). It traces the development of banking through three major phases: the early banking period and institutional consolidation, the nationalisation phase aimed at financial inclusion and rural outreach, and the liberalisation reforms of 1991 that introduced competition, regulatory modernization, and private sector participation. The study further explores how policy initiatives such as the Payment and Settlement Systems Act, 2007 and programmes like Digital India facilitated the emergence of UPI as a low-cost, interoperable digital payment infrastructure that has significantly expanded financial inclusion and transformed everyday transactions. The paper concludes that while India has emerged as a global leader in digital payments, achieving truly inclusive and secure financial digitization will require coordinated regulatory frameworks, stronger cybersecurity and data protection measures, improved digital literacy, and a clearer policy approach toward emerging technologies such as blockchain and virtual digital assets.

Keywords: *Indian Banking Reforms, Digital Payments, Unified Payments Interface (UPI), Financial Inclusion.*

Introduction

For a long time, India's financial system was dominated by traders, middlemen, and brokers who relied on old-school methods to track transactions. But that's changed. Spreadsheets, software, and digital tools have taken over mainly because digitization has swept through the financial sector. Digital transformation here means using tech not just to speed things up, but to make banking more customer-friendly, efficient, and secure. Think mobile banking apps, AI-powered customer service, and blockchain-backed transactions. This shift really began in the early 2000s with private banks bringing in online banking, ATMs, and card payments, stuff that was new to most Indian customers at the time. It started slow, but as internet access improved and digital tools became more affordable, adoption picked up. Even people in remote areas began using digital financial services. A big turning point came in 2016 with demonetization, when the government pushed hard for a cashless economy. Initiatives like Digital India helped spread awareness and made digital payments more mainstream.[1] India's financial sector has gone through a major digital shift, driven by government support, tech innovation, and changing user habits. UPI has played a key role in this, offering simple, low-cost, and secure transactions that boost financial inclusion. These transactions rely on technologies like mobile apps, internet banking, UPI (Unified Payments Interface), debit or credit cards, digital wallets, and even QR codes. In India, digital payments have become a key part of how people and businesses operate. The rise of digital payments is an essential step toward building a more inclusive and digitally empowered economy. But challenges remain like poor internet access, cyber fraud, low digital literacy, and language barriers which risk leaving some people behind. Fixing these gaps will take a joint effort from the government, banks, tech companies, and users. The author of this research project has used the doctrinal method of study. In this research paper, the author has gone through various books, journals, records, and case laws and has used secondary data sources.

How to Cite this Article:
Nalhe, C. (2026). From Traditional Banking to Digital Payments: Policy Evolution and Transformation of India's Financial System. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 189–193. https://doi.org/10.5281/zenodo.22122956

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Evolution Of Banking Services in India

While it is true that most of the modern banking services and methods of banking that we see today were taken from the European system however, it is untrue that similar system did not exist in ancient India. In ancient India, banking took shape through instruments like the *adesha* (a precursor to the bill of exchange), trade guilds that acted as banks by taking deposits and lending, and large temples that served as financial centres. Wealthy merchants and moneylenders, such as the *Sethis*, also played a key role in providing credit and advancing trade. Formal banking however began much later.[2] The evolution of Indian banking can be studied in three stages, one from the British era, one post nationalisation in 1969, one post liberalisation in 1991 and finally banking as it exists today in the modern world. Early Phase From 1786 To 1969 Of Indian Banks When banking first started in India with the Bank of Hindustan (1770-1832) and later the General Bank of India (1786-1791), the sector was fragile. Many of these early banks collapsed quickly because they had low capital reserves, poor management, and no proper regulatory framework.[3] Depositors bore the brunt, often losing their savings when a bank shut down. The situation didn't improve much in the 19th century. The Oudh Commercial Bank (1881) was India's first truly commercial bank, but it also couldn't survive past the mid-20th century. Most banks were tiny, localised, and family-run, which made them vulnerable to failure if a single borrower defaulted or if mismanagement occurred. In fact, between 1913 and 1948, more than 900 banks failed.[4] To provide stability, the Imperial Bank of India was created in 1921 by merging the three presidency banks (of Bengal, Bombay, and Madras). It acted as a quasi-central bank and the biggest commercial bank until 1955, when it was nationalized and renamed the State Bank of India. But the real turning point came with the Hilton Young Commission (1926), which recommended setting up a central bank. This led to the birth of the Reserve Bank of India (RBI) in 1935 under the RBI Act, 1934.[5] Slowly, this helped rebuild public trust and mobilize deposits for economic development. Second Phase: Nationalisation (1969-1991) Even after this, problems persisted. Most large banks were privately owned and primarily served big businesses and urban elites. Agriculture, small industries, and rural communities, which made up the majority of India's population, were largely neglected. Out of nearly 6,000 bank branches in 1969, fewer than 2,000 were located in rural areas.[6] Another problem was the high rate of bank failures and weak public trust in the system. Many private banks collapsed even after independence, often due to mismanagement and speculative practices.[7] This not only hurt depositors but also undermined the ability of banks to mobilize savings for development. India, following a socialist model of planned economic growth, saw banks as essential tools to channel funds into priority sectors such as agriculture, housing, small industries, and exports.[8] Millions of people in rural India, many for the first time, opened bank accounts and began participating in the formal financial system. To meet sector-specific needs, new apex institutions such as NABARD, EXIM, NHB, And SIDBI were established in the 1980s and 1990s, strengthening the link between banking and development planning.[9] By the late 1980s, the government had to step in repeatedly to recapitalise these banks, placing a heavy burden on the exchequer. Nationalisation was a turning point. Third Phase: 1991 Reforms and Beyond By the late 1980s, the Indian economy was under severe strain. Banks, most of which had been nationalised in 1969 and again in 1980, had indeed expanded credit to rural areas and priority sectors, but they had become inefficient, overstaffed, and burdened with mounting non-performing assets (NPAs).[10] Credit decisions were often politically influenced, leading to poor recovery rates. At the same time, India's foreign exchange reserves had dwindled to the point where the country could not finance even two weeks of imports. This crisis of 1991 forced the government to seek assistance from the International Monetary Fund (IMF) and the World Bank, which in turn pressed for structural reforms. It became clear that without modernising the financial sector, India could not integrate with the global economy. The first major intervention came with the Narasimham Committee (1991), often called the father of banking reforms in India.[11] The committee recommended reducing statutory pre-emptions such as the Statutory Liquidity Ratio (SLR) and Cash Reserve Ratio (CRR), which had

[2] Vatsal Nitin Sheth, 'Study of Evolution of Banking Sector in India and the Risks Faced by Banks', UNIVERSITY OF MUMBAI, 2023, pp.15-17.

[3] Rimple Saini & Dr. S.L. Lodha, 'Banking Development in India', JOURNAL OF ECONOMICS AND SUSTAINABLE DEVELOPMENT, Vol.5 No., 24, 2024, pp. 5-7.

[4] Amol Agrawal, 'Banking Crises: An Indian History' LIVELAW, 2018, https://www.livemint.com/Sundayapp/fjheowjLjiFNsGcjzVZXsO/Banking-crises-An-Indian-history.html.

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[7] Banuprakash K.A., 'An Economic analysis of Nationalisation as a process of Financial Inclusion', INTERNATIONAL JOURNAL OF CREATIVE RESEARCH THOUGHTS, Vol.9, No. 5, 2021, pp.1-7.

[8] Rakesh Mohan, 'Evolution of Central Banking in India', RBI BULLETIN, 2006, pp. 5-18.

[9] Ipsita Lenka, 'Nationalisation of Banks', INTERNATIONAL JOURNAL OF LAW MANAGEMENT & HUMANITIES, Vol. 4, No. 5, 2021, pp.5-7.

[10] Aishwarya Sehgal, Rashmi Singh Rana & Harsh Purohit, 'The Evolution and Performance of the Indian Banking System: Milestones, Structural Reforms and Strategic Pathways in the Indian Economy', JOURNAL OF VISUAL AND PERFORMING ARTS, Vol. 4, 2024, pp.8.

[11] Narasimhan Committee I, 'Report of Committee on the Financial System', RBI, 1991.

locked up a large part of banks' funds in government securities. These changes aimed to make banks more competitive, transparent, and financially sound.[12]

Following this, the Varma Committee (1996) focused specifically on restructuring weak banks. The Khan Committee (1997) emphasised the concept of 'universal banking,' suggesting that development financial institutions and commercial banks should converge, so that the financial sector could meet diverse needs more efficiently. Finally, the Second Narasimham Committee (1998) built on earlier reforms, recommending consolidation of banks, recapitalisation of weak ones, reduction of government equity in public sector banks to 33%, and faster adoption of global prudential norms.[13] Public sector banks continued to face political pressures and governance issues, and the problem of NPAs, though temporarily reduced, resurfaced in the 2010s as credit expansion outpaced monitoring.

Transformation Of Banking Services into Digital Payment Systems Like UPI

India's digital payments landscape has been transformed in the past decade, and the Unified Payments Interface (UPI) sits at the heart of this change. Before its introduction in 2016, we relied on systems such as NEFT, RTGS, IMPS, debit and credit cards, and mobile wallets.[14] Each of these had serious limitations. Card transactions carried charges that discouraged small shopkeepers and vendors from adopting them. Card infrastructure like POS machines was also limited to urban areas, wallets were not interoperable, and digital payments were still confined largely to urban spaces. At the same time, many people who had been brought into the banking net through initiatives like the Jan Dhan Yojana still found it difficult to access smooth, affordable digital transactions. These gaps meant India's payment ecosystem was fragmented, costly, and inaccessible to large parts of the population. NEFT and RTGS, for instance, worked only during banking hours (RTGS slightly better but still not 24/7 in the early years) and required detailed bank account information, making them slow and cumbersome for everyday use.[15]

The impact was immediate and far-reaching. UPI dramatically lowered barriers to digital adoption, allowing even small shopkeepers and roadside vendors to accept payments simply through QR codes. Investment in fintech firms surged alongside its rise, with players like Paytm, PhonePe, and BharatPe drawing massive funding rounds in 2019 and 2021. The Covid-19 pandemic further accelerated UPI's adoption, as consumers and businesses shifted decisively toward contactless and cashless transactions. Today, UPI has become synonymous with digital payments in India, reshaping not only how individuals pay but also how businesses, banks, and investors view the financial ecosystem.

Recent Developments in the Expansion of UPI Network

Between 2023 and 2025, UPI has seen major innovations that mark a shift from being a domestic payments tool to a global financial infrastructure.[16] India has already enabled UPI acceptance in countries such as Singapore, UAE, Mauritius, Sri Lanka, Bhutan, and even France, where the Eiffel Tower became one of the first foreign sites to pilot UPI QR payments.[17] Cross-border transactions are growing rapidly, with over six lakh international UPI payments recorded in the first few months of FY26 alone.[18] Another significant step is the linking of RuPay credit cards to UPI, allowing users to scan QR codes and pay merchants on credit rather than directly from bank accounts, expanding consumer choice though limited for now to merchant payments (P2M). To make India friendlier for visitors, UPI was also opened to foreign tourists in 2023, enabling them to link international cards for use with UPI apps during their stay. Meanwhile, the Reserve Bank of India's Digital Rupee (CBDC) pilot has gained momentum: transaction value jumped from just Rs. 5.7 crore in 2023 to over Rs. 1,000 crores by 2025, with interoperability allowing users to pay merchants via UPI QR codes using the digital rupee.[19]

Policy Suggestions for Re-Thinking India's Approach Towards Technological Advancements.

Indian stance towards fintech remains an interesting one, while it wants to lead the world when it comes to digital transactions and has introduced policies like Central Bank Digital Currency (CBDC), it remains very rigid on regulatory frameworks and wants to control the industry by keeping strict oversight over private entities. It is clear that India has ambitions of leading the field of digital payments and this is evidenced by programmes like Digital India and the push for a cashless economy, however the materialisation of these ambitions is difficult

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[12] Shankar Acharya, 'India: Crisis, Reforms and Growth in the Nineties', STANFORD CENTRE FOR INTERNATIONAL DEVELOPMENT, 2002, pp.25-28.

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[18] Siddharth Upsani, 'International Use of UPI Surges, 6 Lakh Transactions in First 4 Months of FY 2026', INDIAN EXPRESS, 2025, https://indianexpress.com/article/business/international-upi-surges-transactions-fy26-10183216/?

[19] Saloni Shukla, 'How has Digital Rupee Grown 180 Times in Just Two Years?', 2025 https://economictimes.indiatimes.com/markets/forex/how-has-the-digital-rupee-grown-180-times-in-just-two-years/articleshow/121583494.cms?

if India does not make sweeping policy changes when it comes to inclusion of *blockchain, cryptocurrencies, non-fungible tokens (NFTs) and other virtual digital assets (VDAs)*. India's current stance on Virtual Digital Assets (VDAs), including cryptocurrencies, reflects a cautious and somewhat restrictive approach. [20] While the government's concerns about financial stability and investor protection are valid, the existing policies may inadvertently stifle innovation and growth in a sector that is rapidly gaining global traction. In 2022, India introduced a 30% flat tax on profits from VDAs, along with a 1% Tax Deducted at Source (TDS) on each transaction.[21] This tax regime has been criticized for its lack of nuance and has had unintended consequences. For instance, major Indian crypto exchanges reported a 70-90% decline in trading volumes post the implementation of the 1% TDS in July 2022. The high tax burden, coupled with the inability to offset losses, has led to liquidity constraints and a decline in trading volumes. This approach may deter retail investors and traders, potentially pushing them towards unregulated platforms.

The 2020 Supreme Court judgment in the ***Internet and Mobile Association of India (IAMAI) v. Reserve Bank of India (RBI)***[22] case struck down the RBI's banking ban on crypto transactions. While this was a significant victory for the crypto community, it highlighted the lack of a comprehensive regulatory framework for VDAs in India. [23] The absence of clear regulations has led to a fragmented approach, with different authorities issuing conflicting statements. For instance, while the Supreme Court ruled against the RBI's ban, the central bank has continued to express concerns about the risks posed by cryptocurrencies. Many of the problems faced by UPI can be solved by implementing a blockchain framework which will help in decentralisation of servers. However, effective policy is required so that this can be properly implemented without harm. Indian regulators, including the Reserve Bank of India (RBI), the Securities and Exchange Board of India (SEBI), and the Insurance Regulatory and Development Authority of India (IRDAI), have recognized RegTech's potential and have begun experimenting with innovation hubs and regulatory sandboxes to encourage its development.[24]

SureTech refers to the use of digital technologies to improve insurance operations, customer experience, and risk management. In India, the insurance sector has been gradually adopting SureTech solutions to modernize processes and reach more customers. InsurTech platforms allow customers to buy policies online, submit claims digitally, and track claim status in real time, reducing paperwork and delays. The Payment and Settlement Systems Act, 2007, SEBI Mutual Fund Regulations, and IRDAI digital guidelines provide legal backing for operations and compliance. However, there are major policy gaps. While many RegTech and SureTech firms are experimenting with blockchain for transparency, smart contracts, and immutable audit trails, there is no comprehensive legal framework governing blockchain use in financial services yet. [25] Blockchain solutions vary widely between companies. Without standardization, interoperability between different platforms remains a challenge. There is also ambiguity regarding the issues related to privacy and the immutability of blockchain records. [26] Technology evolves faster than regulatory amendments, so firms often operate in a gray zone, which can pose systemic and legal risks. Apart from NITI Aayog's comprehensive framework for the adoption of blockchain in India, there remains no national policy in this regard. India needs to change its hands off approach when it comes to blockchain and cryptocurrencies.

Conclusion

India's rapid digital transformation has redefined how people interact with financial systems. The spread of digital banking, UPI, RegTech, InsurTech, and blockchain shows how technology can democratize access to money and make the economy more transparent and efficient. But technology alone isn't enough. Its success depends on policies that are flexible, forward-looking, and responsive to the realities of an evolving financial landscape. To begin with, there's a growing need for cohesive regulatory design. Digital payment platforms, insurance aggregators, and fintech startups all operate under overlapping yet inconsistent regulations. The Reserve Bank of India, SEBI, IRDAI, and MeitY often work in silos, leading to grey areas in accountability and compliance. Every UPI transaction, credit scoring algorithm, or AI-based insurance claim produces massive amounts of personal data. Without clear rules on ownership, storage, and consent, users remain vulnerable to breaches and misuse. The Digital Personal Data Protection Act, 2023, is a start, but it needs to be integrated into sector-specific financial laws. The goal should be a system where individuals control their own financial data, where privacy and transparency work together, not at odds. Digital literacy and access must also be treated as national priorities. While India's digital payment story is remarkable, it's still largely urban.

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[20] Ayush Rawat & Prof. (Dr.) Anil Kumar Dixit, 'Virtual Digital Assets in India: From Gray Area to Regulated Reality', INTERNATIONAL JOURMAL OF RESEARCH PUBLICATION AND REVIEWS, 2025, pp. 1-4.

[21] Taxation Framework of Virtual Digital Assets, PWC, https://www.pwc.in/tax-knowledge-hub/taxation-framework-of-virtual-digital-assets.html

[22] AIR ONLINE 2020 SC 298.

[23] No Change in Stance on Crypto, concerned Over Risks to Policy, Stability, TIMES OF INDIA, 2025, https://timesofindia.indiatimes.com/business/india-business/no-change-in-stance-on-crypto-concerned-over-risks-to-policy-stability/articleshow/121684301.cms?

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[26] Soujaatyaa Roy, 'The Impact of Blockchain Technology on Financial Regulations and Legal Frameworks', SRNN, 2023, pp.5-8.

Right now, UPI works beautifully for bank-to-bank transfers, but its integration with credit systems, insurance payouts, or CBDC (Central Bank Digital Currency) pilots remains limited. Encouraging open standards and shared APIs would allow fintech firms to build solutions that cut across sectors, improving both competition and consumer experience. Finally, collaboration between regulators, technology providers, and institutions has to become the norm rather than the exception. Sandbox models introduced by RBI and SEBI are good steps, but they should evolve into permanent innovation hubs where policymakers, developers, and financial experts co-design new tools under controlled conditions. The way forward is clear, technology can make finance inclusive and intelligent, but only if regulation keeps pace with innovation. Strategic policy reform can turn India from a digital payments leader into a global model for digital governance. If done right, a farmer in Jalgaon, a trader in Mumbai, and a student in Shillong could all access the same transparent, safe, and efficient financial network; proof that a truly Digital India is not just a vision but a shared reality.

Acknowledgement
I would like to express my sincere gratitude to everyone who supported and guided me in completing this research paper titled "From Traditional Banking to Digital Payments: Policy Evolution and Transformation of India's Financial System." The study examines the evolution of Indian banking, banking reforms, financial inclusion, and the transformation toward digital payment systems such as UPI.

Financial support and sponsorship
Nil.

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

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Manuscript ID:
TIJCMBLIR-2026-030437

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29 July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22122997

DOI Link:
https://doi.org/10.5281/zenodo.22122997

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Contemporary Analysis of Kautilya's Arthashastra

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Abstract

Kautilya, also known as Chanakya, is regarded as one of the earliest economists and political philosophers in world history. His crucial work, the Arthashastra, written around the fourth century BCE, presents a comprehensive framework of economic governance, public administration, taxation, trade, agriculture, public finance, and statecraft. Unlike modern economic theories that primarily emphasize markets and individual choice, Kautilya viewed economics as inseparable from governance, ethics, security, and social welfare. Because of ethics and values this ancient knowledge is still prevalent despite changing modern economic scenarios. The objective of this paper is to examine Kautilya's major economic principles and evaluate their relevance in addressing contemporary economic challenges such as sustainable development, public finance and good governance. The study adopts a qualitative research methodology based on review of classical texts and contemporary scholarly literature. The findings suggest that although Kautilya's ideas emerged within the context of a monarchical state, many of his economic principles remain highly applicable to modern democratic economies. The paper concludes that Kautilya's economic philosophy provides a timeless framework for achieving sustainable economic development through effective governance and ethical administration.

Keywords: *Kautilya, Arthashastra, Economic Thought, Good Governance, Sustainable Development, Welfare Economics*

Introduction

Economic thought has evolved significantly from ancient civilizations to the contemporary global economy. However, many foundational principles of economics and governance continue to follow the classical thinkers whose ideas pass through historical periods. Among such scholars, Kautilya occupies a distinguished place. He served as the chief adviser to Emperor Chandragupta Maurya and authored the Arthashastra, a book known for treatises on political economy, administration, and governance.

The Arthashastra is far more than a political manual. It presents a detailed economic philosophy comprising taxation, fiscal policy, public expenditure, agriculture, trade regulation, labour management, natural resource utilization, public welfare, and economic security. Kautilya argued that the prosperity of the state depended fundamentally on the prosperity of its citizens. According to him: "In the happiness of the subjects lies the happiness of the king; in their welfare his welfare." This principle reflects public welfare emphasizing that economic policy should ultimately serve the interests of subjects rather than the state.

The twenty-first century experiences development in all aspects but despite development there are numerous economic challenges, including rising inequality, fiscal deficits, environmental degradation, unemployment, inflation, and governance failures. Government seeks policy frameworks capable of balancing economic growth with social justice and environmental sustainability. Many of Kautilya's economic ideologies continue to resonate and find resolve economic issues.

This paper critically analyses Kautilya's economic philosophy and explores its applicability in contemporary economic policymaking. It also compares Kautilya's ideas with modern economic theories and identifies lessons for present-day governance.

Review of Literature

Ancient Indian economic thought has received increasing scholarly attention over the past few decades. Researchers have examined the Arthashastra from perspectives including economics, political science, management, public administration, and strategic studies. **Kangle (1965)** produced one of the most authoritative translations and critical editions of the Arthashastra.

How to Cite this Article:
Sharma, S. (2026). Contemporary Analysis of Kautilya's Arthashastra. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 194–197. https://doi.org/10.5281/zenodo.22122997

His work remains the standard academic reference for understanding Kautilya's original economic ideas. Kangle demonstrated that the Arthashastra presents a sophisticated system of taxation, budgeting, and state administration comparable to many modern institutions. **Rangarajan (1992)** emphasized that Kautilya viewed the state as both regulator and facilitator of economic activity. According to Rangarajan, the ruler's responsibility extended beyond revenue collection to ensuring agricultural productivity, market efficiency, and public welfare. **Boesche (2002)** argued that Kautilya anticipated several modern concepts of political economy, including national security, economic intelligence, regulation of markets, and anti-corruption mechanisms. His study highlights the practical orientation of Kautilya's economic policies. **Sen (1987)** noted that welfare has historically occupied an important position in Indian economic thought. Although Sen focuses primarily on capability and development, his discussion indirectly supports Kautilya's emphasis on improving citizens' well-being through effective governance. **Thakur (2010)** examined Kautilya's fiscal administration and concluded that many principles of public finance—including efficient tax collection, financial accountability, and expenditure control—remain highly relevant. **Sihag (2009)** compared Kautilya's ideas with modern welfare economics. The study argues that Kautilya recognized the importance of incentives, institutions, and governance centuries before these concepts became central to contemporary economics. **Das (2018)** analyzed Kautilya's agricultural policies and found striking similarities between ancient recommendations and present-day rural development programs. State investment in irrigation, disaster relief, and agricultural extension reflects Kautilya's developmental approach. **Sharma (2016)** emphasized that Kautilya advocated ethical leadership, transparency, and accountability in public administration. These principles align closely with current governance reforms aimed at reducing corruption and improving public service delivery. **Rao (2014)** examined Kautilya's trade policies and concluded that his regulatory framework promoted fair competition while protecting consumers from fraud and monopolistic practices. **Kumar (2021)** argued that Kautilya's emphasis on strategic sectors and economic security has regained importance amid globalization, supply-chain disruptions, and geopolitical uncertainty. **Sihag (2009)** Rather than advocating unrestricted markets or complete state control, Kautilya proposed a **balanced model** in which the state functions as a facilitator, regulator, and guardian of public welfare. This perspective resonates strongly with the contemporary concept of a **developmental state**, where governments create conditions for economic growth while ensuring social equity.

Research Gap, Objectives and Research Methodology:

Contemporary policymakers increasingly recognize that sustainable economic development requires ethical governance. Kautilya's Arthashastra has regained research attention. There exists a need to systematically examine whether ancient Indian economic thought can contribute meaningful solutions for challenges of good governance and sustainable development.

Most existing studies focus either on Kautilya's political philosophy or on isolated aspects such as good governance. Relatively few studies provide an integrated analysis linking his economic principles with contemporary issues including sustainable development, good governance, fiscal management, and inclusive growth. The study addresses this gap by offering a comprehensive evaluation of Kautilya's economic thought and its relevance to today's world.

The objectives of the paper are to:

1. Examine Kautilya's key economic principles as described in the Arthashastra.
2. Analyze his views regarding public finance, taxation and agriculture in today's context
3. Analyze his views with regard to good governance and sustainable development today

The present study adopts a review and comparative analysis method for the study since the objective is to examine and interpret Kautilya's economic philosophy. It explores the theoretical foundations of Kautilya's economic thought and interprets them in light of modern economic concepts such as fiscal responsibility, welfare economics, sustainable development, public finance, and good governance. The study relies exclusively on secondary data. Literatue review is collected through systemic review of journals and books.

Kautilya's economic philosophy:

1 Concept of Wealth - Kautilya considered **Artha (wealth)** as the foundation of individual prosperity and state stability. Unlike purely profit-oriented approaches, he viewed wealth as a means to secure justice, security, and public welfare. According to the Arthashastra, "The root of wealth is economic activity, and the root of economic activity is the state." This illustrates the reciprocal relationship between governance and economic prosperity (Kangle, 1965). Modern economists similarly recognize that strong institutions support long-term economic growth (North, 1990).

2 Public Finance - One of Kautilya's greatest contributions lies in public finance. He proposed that governments should maximize revenue without exploitation, minimize wasteful expenditure, maintain fiscal discipline, create reserve funds, invest in productive infrastructure. Public expenditure should primarily support irrigation, roads, education, defense, agriculture, disaster relief. These principles closely resemble modern fiscal management.

3 Taxation - Taxation occupies a central position in Kautilya's economic philosophy. He argued that taxation should satisfy three principles: a) Equity - Taxes should correspond to taxpayers' capacity. b) Certainty - Tax rates should be predictable. c) Convenience - Collection should not disrupt economic activity. Kautilya famously compared taxation to a bee collecting honey without harming the flower. This principle resembles Adam Smith's later canons of

taxation. According to Sihag (2009), Kautilya recognized that excessive taxation discourages production and investment.

4 Agriculture - Agriculture was considered the backbone of the economy. Kautilya recommended that governments should construct irrigation systems, reclaim wastelands, encourage cultivation, provide seeds during crises, protect farmers and maintain food security. He regarded agriculture as the largest source of employment and revenue. Today these principles correspond closely with agricultural subsidies, crop insurance, irrigation projects and rural employment programs.

5 Trade and Commerce - Kautilya supported free commercial activity but insisted on government regulation to ensure fairness. The Superintendent of Commerce monitored prices, weights, quality, imports, exports, market competition. He opposed hoarding, black marketing, adulteration, fraudulent trade. Rangarajan (1992) notes that Kautilya viewed regulation as a means of protecting both consumers and the state. Kautilya emphasized fair treatment of laborers. His recommendations included timely payment of wages, defined responsibilities, penalties for exploitation, skilled workforce development, protection of workers. He considered labor productivity essential for national prosperity. These ideas resemble present-day labor legislation concerning minimum wages, occupational safety, and social security.

6 Welfare Economics - Unlike many ancient political thinkers, Kautilya believed the state existed for public welfare. His philosophy included employment generation, poverty reduction, disaster relief, healthcare, public works, food security. His famous principle,"The king's happiness lies in the happiness of his subjects," reflects an early form of welfare economics (Rangarajan, 1992).

7 Good governance - Kautilya devoted considerable attention to corruption in public administration. He argued that government officials should be continuously monitored because opportunities for misuse of public resources are inherent in administration. His recommendations included: regular audits, rotation of officials, surprise inspections, strict penalties, transparent record-keeping. Boesche (2002) observes that Kautilya's administrative framework anticipated many principles of modern accountability and institutional oversight.

Comparative Analysis of Kautilya's Philosophy with today's policy and practices:

1 Good Governance - One of Kautilya's most enduring contributions is his emphasis on good governance. He viewed efficient administration as indispensable for economic prosperity and social stability. Public officials were expected to uphold integrity, competence, and accountability, with mechanisms such as audits, inspections, and strict penalties to deter corruption (Boesche, 2002). Corruption remains a significant challenge for both developed and developing economies. Kautilya recognized that misuse of public office weakens state finances and erodes public trust. His recommendations included: financial audits, separation of responsibilities, surprise inspections, rotation of officials, severe penalties. These principles closely resemble modern governance practices promoted by institutions such as the World Bank and Transparency International. In the twenty-first century, good governance has become a cornerstone of sustainable development. Institutions such as the United Nations, the World Bank, and the Organization for Economic Co-operation and Development (OECD) stress transparency, accountability, and effective public administration as prerequisites for economic growth.

Contemporary Relevance: Digital governance and e-governance initiatives. Performance-based public administration. Social audits and financial accountability. Anti-corruption agencies. Right to Information legislation.

2 Fiscal Responsibility and Public Finance - Kautilya emphasized prudent fiscal management, advocating that governments maintain financial discipline while ensuring adequate investment in productive sectors such as agriculture, irrigation, trade, and infrastructure. His recommendations closely resemble the objectives of modern fiscal responsibility legislation, including: balanced budgeting, efficient revenue mobilization, prudent public expenditure, sustainable debt management. Countries across the world increasingly adopt fiscal rules to ensure macroeconomic stability. Kautilya's insistence on maintaining treasury reserves is particularly relevant during periods of economic shocks, pandemics, or financial crises (Rangarajan, 1992).

Contemporary Relevance: Kautilya recommended treasury reserves while modern fiscal policy ensures Sovereign wealth and contingency funds. He advocated productive public expenditure whereas modern economies devote a large percent to Capex and infrastructure investment. For efficient tax collection digital tax administration is practiced. For expenditure control FRBM fiscal responsibility and budget management act is formed.

From taxation perspective he suggested moderate taxes which shouldn't hurt the subjects, modern day taxation is also progressive on same lines to ensure paying capacity. Kautilya advocated efficient collection and predictability whereas modern tax system is administered digitally to ensure transparency.

3 Sustainable Agriculture and Food Security - Agriculture formed the economic foundation of the Mauryan Empire. Kautilya recommended state investment in irrigation, land reclamation, seed distribution, grain storage, and disaster relief. These principles are directly relevant to contemporary challenges such as climate change, declining agricultural productivity, food insecurity, rural poverty and water scarcity. Modern governments continue to invest in irrigation infrastructure, crop insurance, disaster relief, agricultural extension, climate-resilient farming, food security programs. Kautilya's vision anticipated the modern concept of sustainable agricultural development by emphasizing productivity alongside resilience. Major irrigation schemes,

watershed management and strategic food reserves are parallel to Kautilya's recommendation grain reserves and irrigation projects and land development.

4 Inclusive Growth and Welfare Economics

Modern development economics increasingly recognizes that economic growth alone cannot ensure social progress. Inclusive growth requires reducing poverty, expanding employment, improving healthcare, and providing quality education. Kautilya advocated a similar philosophy. He maintained that state policies should enhance the welfare of all citizens, especially vulnerable groups. His welfare-oriented approach anticipated several principles later developed in welfare economics and human development theory (Sen, 1987). Examples of contemporary relevance include: poverty alleviation programs, employment guarantee schemes, social protection systems, universal healthcare, food security initiatives and public education.

5 Relevance to Sustainable Development Goals (SDGs)

Although separated by over two thousand years, many of Kautilya's principles align with the United Nations Sustainable Development Goals. The table below showcases the holistic perspective in Kautilya's philosophy.

Table 1. Kautilya's Economic Thought and SDGs

Kautilya's Principle	Relevant SDG
Poverty reduction	SDG 1 – No Poverty
Agricultural development	SDG 2 – Zero Hunger
Public welfare	SDG 3 – Good Health and Well-being
Infrastructure development	SDG 9 – Industry, Innovation and Infrastructure
Reduced corruption	SDG 16 – Peace, Justice and Strong Institutions
Sustainable resource management	SDG 12 – Responsible Consumption and Production

The resemblance and relevance of Kautilya's Arthshastra with modern day Sustainable Development Goals (SDGs) cannot be denied. Following ancient wisdom and lesson is the only way to progress with values and ensuring ethical development.

Conclusion

The analysis suggests several policy lessons for contemporary governments such as to maintain fiscal discipline while investing in productive infrastructure. Design equitable tax systems that encourage compliance rather than excessive burdens. Prioritize agricultural resilience and food security. Strengthen institutional mechanisms to reduce corruption. Promote ethical governance through transparency and accountability. Protect strategic sectors critical to national economic security. Integrate economic growth with social welfare and environmental sustainability. These recommendations demonstrate that Kautilya's economic philosophy remains a valuable resource for contemporary public policy and development planning.

Acknowledgment

I would like to express my sincere gratitude to all those who contributed directly or indirectly to the completion of this research paper, "Contemporary Analysis of Kautilya's Arthashastra." The study examines Kautilya's economic philosophy and its contemporary relevance to public finance, taxation, agriculture, good governance, welfare economics, and sustainable development.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030438

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29 July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22123102

DOI Link:
https://doi.org/10.5281/zenodo.22123102

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Capital Punishment and the Collective Nature of an Individual Human Action

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Abstract

Capital Punishment is based on the philosophy of eliminating the wrongdoer to prevent him from re-engaging in an aggravated or other offences. It is also seen as deterrent and retributive in nature. The modern theories of criminal justice have shifted towards the reformative approaches since retribution-based penalty of death is not only primitive, brute and inhuman but also has little or no deterrent social implications. This study, however, proposes the reasoning that the individual human mind is essentially collective in nature and, therefore, it is the society as a collective which intends and acts through the instrument of an individual human body. The individual behaviour is shaped by one's society, including the forces of Nature (in the form of Samskaras or mental impressions of ancestors, whose psyches were in turn shaped collectively by their extended society and so on) and the forces of Nurture. The reasoning finds support in certain distinguished psychological studies in the West esp. the idea of the Collective Unconscious of Carl Gustav Jung, several sociological writings, and the psychological argumentation in the Indian philosophical traditions. This research is based on secondary sources including review of existing literature, scholarly and juristic works. The purpose is to argue that the body is an instrumentality of an action and, therefore, must not be eliminated for the volitions of the mind, which pilots the body and is in itself an accumulation of external impressions or Samskaras.

Keywords: *Capital Punishment, Abolition of Death penalty, Reformative Approaches, Collective Unconscious, Individual Behaviour, Body- Mind dualism, Samskaras, Social Impressions, Extended society, Forces of Nature and Nurture.*

Introduction

Capital punishment remains one of the most debated forms of criminal punishment in contemporary legal systems but there is a growing international consensus in favour of its abolition. The present study proposes a different line of reasoning for abolition of death penalty from the conventional argument, by arguing that the human psyche is collective in nature, shaped by the extended society and this collective social force acts through the instrument of physical human body. The whole conception of good and evil, of rights and wrongs, of desires and ambitions, of love and hate, of losses and gains, and of fears and insecurities in man has been infused and installed by the collective social forces acting upon an individual human organism.

This proposition draws support from multiple disciplines. The writings of psychologists such as Carl Gustav Jung and sociologists such as McIver and Page and others have emphasized that collective influences shape human personality through the complex processes of psychological internalization and socialization. The Indian philosophical traditions, including Vedanta, Buddhism, and Jainism, likewise explain human conduct through the concepts of *Chitta, vasanas,* and *samskaras*, which represent accumulated mental impressions acquired through experience and conditioning. Therefore, the study recommends, after discussion with the help of relevant Indian Supreme Court cases on the subject, that the abolition of capital punishment and saving the physical body would better serve the ends of justice by leaving the wrongdoer to realize the nature and consequences of his wrongful act, and to undergo the torment of the sense of guilt, shame and remorse and possible transformation in the process**.**

Literature review

The enormous volume of existing literature on the subject critically examines the constitutionality, deterrent value, proportionality, and moral justification of the death penalty. One of the earliest critiques of capital punishment was advanced by Cesare Beccaria who argued that State possesses no moral authority to deprive an individual of his life when less severe punishments can adequately protect society. Modern criminology has shifted away from purely retributive approach towards reformation and rehabilitation.

How to Cite this Article:
Yadav, V. P. (2026). Capital Punishment and the Collective Nature of an Individual Human Action. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 198–201. https://doi.org/10.5281/zenodo.22123102

This shift is an acknowledgement that crime results from a combination of biological, psychological, economic, and social factors rather than solely from individual choice. However, relatively little attention has been devoted to understanding criminal behaviour through the combined perspectives of analytical psychology, the process of socialization, and the philosophical position on the nature of *Chitta* in Indian thought.

The present study is primarily based on psychological works of Carl Gustav Jung, particularly his theory of the Collective Unconscious, on certain sociological developments like the role of socialization in shaping individual behaviour where the analysis emphasizes that human personality develops largely within society, and on the existing Indian philosophical traditions where the concepts of *chitta, vasanas*, and *samskaras* are seen to leave a decisive influence on individual conduct. From the legal perspective, the Latin maxim *Actus non facit reum nisi mens sit rea* and the doctrine of *doli incapax* are also discussed. The increasing convergence of Indian Judiciary towards the present reasoning is analysed with the help of the Supreme Court decisions in Bachan Singh v. State of Punjab, Machhi Singh v. State of Punjab and Mithu v. State of Punjab.

Research Gap

An important interdisciplinary gap in the abolitionist debate is found in the lack of attention towards the relationship between collective nature of the individual psyche and the resultant criminal behaviour and culpability. Moreover, while the legal maxim *Actus non facit reum nisi mens sit rea* forms the cornerstone of criminal jurisprudence, existing literature has seldom enquired into the collective origin and formation of the guilty mind itself. Most legal analyses focus on proving the existence of criminal intention rather than examining whether such intention is based on collective psychological and social processes. The present study seeks to bridge this gap by arguing that criminal behaviour is not merely the product of individual volition but is shaped primarily by collective social, cultural, hereditary, and psychological influences.

Research Objectives

1 The study investigates the proposition that while the body performs the external act, the mind, which is shaped by society, forms the intention (the mind proposes and the physical body disposes) and, thereby, questioning the logic of eliminating the physical body through death penalty.

2 To analyse the collective nature of the individual human mind.

3 To evaluate the implications of collective psychological conditioning for criminal liability and conclude that preserving the life of the offender better serves the objectives of justice.

Research Questions

1 This research question investigates whether human thoughts, intentions, values, and actions are primarily products of individual free will or are substantially influenced by socialization, inherited psychological dispositions, cultural conditioning, and accumulated mental impressions (*samskaras*).

2 Whether Capital Punishment is consistent with the modern Sociological and psychological, findings, age-old ideas of *vikaras* and *samskaras* operating as drivers of human conduct?

3 Do the legal concepts of *mens rea* and *doli incapax* support a distinction between the physical body as vehicle and the guilty mind as driver in determining criminal responsibility?

4 Whether the death penalty is valid in the light of modern psycho-sociological and ancient philosophical arguments, legal principles of *mens rea* and *doli incapax* and evolving constitutional jurisprudence?

Research Methodology

1 Nature of the Study

The present research is doctrinal, analytical, and interdisciplinary in nature. It adopts a qualitative approach and seeks to analyse the relationship between individual human action and collective social influences. It explores an interdisciplinary perspective that has received limited attention in legal scholarship, while also analysing certain existing legal principles governing the ascertainment of guilt of an accused. The study does not involve empirical investigation or field surveys.

2 Sources of Data

The study is based, for analysis, entirely on secondary sources of data, including books, commentaries, classical philosophical works, academic writings, juristic opinions, Judicial pronouncements, case laws and the Law commission of India report on death penalty.

3 Method of Analysis

The research employs a combination of analytical methods for doctrinal analysis, such as analogy, deductive reasoning, interpretation tools and comparative study. The study begins with the established theories in psychology, sociology, and Indian philosophy and applies them in the particular case of capital punishment. Additionally, the study employs analogy to explain the relationship between the body and the mind. The body is viewed as a chariot (the physical instrument) through which intentions are executed, while the mind (the charioteer)—conditioned by inherited dispositions, socialization, and accumulated *samskaras*—is shown as the primary source of volition. Comparative study of the doctrines *of Actus non facit reum nisi mens sit rea,* and *doli incapax* is undertaken for examining the validity of reasoning for death penalty in the light of the fundamental principles of culpability.

4 Scope and Limitations

The study is limited to doctrinal and theoretical analysis and does not include empirical study. Furthermore, the psychological and philosophical theories discussed are not claimed to have scientifically conclusive explanations of human behaviour or to have faced no counter arguments. Also, the study does not seek to deny individual legal responsibility but instead proposes an alternative conceptual framework to have

a re-look into the arguments for capital punishment and their validity. Despite these limitations, the present interdisciplinary approach provides a fresh perspective in favour of the advocacy for abolition of capital punishment.

Analysis and Findings

1 The Body as an Instrument of Action and the Collective Nature of Human Psyche Under the traditional approach, the criminal act is viewed primarily as the product of personal intention, and the offender alone is considered responsible for the consequences of such intention. The present research questions this assumption and argues that the human psyche is not formed in isolation. An individual's personality, beliefs, emotions, moral understanding, and behavioural tendencies develop through continuous interaction with society and inherited psychological influences. Therefore, a human personality is collectively shaped and programmed not only by the immediate but also by the extended society which includes *the samskaras* received through genes in the form of dispositions of ancestors.

2 Psychological and sociological Perspectives

Carl Gustav Jung's theory of the Collective Unconscious provides a psychological basis for understanding the deeper collective dimensions of human behaviour. Jung argued that the unconscious mind contains inherited structures and archetypal patterns that influence human thought and action. He has most emphatically stated that the unconscious, the dominant part of human psyche, largely responsible for individual action, is collective. Thus, man carries in himself the influences of his own society and of the society of his forefathers. Applied to criminal jurisprudence, this perspective suggests that human intentions may emerge from complex psychological conditions rather than from completely independent rational choice. Emerging sociology has asserted that society plays a fundamental role in shaping human personality. An individual learns language, values, customs, social norms, concepts of right and wrong, aspirations, and fears through the process of socialization. McIver and Page, in their book 'Society: An Introductory Analysis', cite the case study of a Hindu child named Kamala, aged eight, who was discovered in a wolf den, *"…brought with her almost none of the traits that we associate with human behaviour. She could walk only on all fours, possessed no language save wolflike growls and was as shy of humans as was any other undomesticated animals…But the emergence of individuality was altogether dependent upon her membership in human society."*

3 Indian Philosophical Perspective: *Samskaras* and Conditioning of the Mind

In India, the Vedanta, Jaina and Buddhist traditions had recognized that human behaviour is influenced by accumulated impressions known as *samskaras* and the mind is a collection of impressions created through experiences, actions, and conditioning. Buddhist philosophy emphasizes dependent origination, according to which every action arises from a chain of causation rather than from isolated individual will. The Indian philosophical traditions do not consider *Chitta* as *tabula rasa*. The Bhagvadgita compares human body with a chariot and the mind with the charioteer. Abhinav Gupta, a Medieval Indian philosopher of Kashmir Shaivism has said in his commentary on Bhagvadgita that "*Kurukshetra* means human body." Thus, the characters of *Mahabharata* are seen as different elements of the mind staging their play on the body, that is, *Kurukshetra*.

4 Implications of the Principles of *Mens Rea* and *doli incapax*

The Latin maxim *Actus non facit reum nisi mens sit rea* attributes culpability to the intent (*mens rea*) and not to the act itself (*actus reus*), therefore, extinguishing the body which is mistaken for real culprit, the mind, is a disregard of the principle. Instead, by punishing the more conscious psychic force in the man, we can punish the collective society in him. Another cardinal legal principle of ***'doli incapax'*** accepts that a child below a certain age has not learnt and acquired the capacity to form the criminal intent necessary for culpability. Thus, a distinction between the physical and the mental is acknowledged with the understanding that the mental element develops in interaction with our surroundings.

5 Critical Evaluation of the study in the light of the legal regime in India

The movement towards abolition of capital punishment has been strongly influenced by international human rights law. The Universal Declaration of Human Rights, 1948, although does not expressly prohibit the death penalty, it recognizes the inherent dignity of all members of the human family and guarantees the right to life. The Indian legal system, including the newly enacted Bharatiya Nyaya Sanhita (BNS), 2023, retains capital punishment as an exceptional form of punishment for certain serious offences such as murder, terrorism-related offences, aggravated forms of sexual offences, and certain offences affecting national security. However, judicial interpretation has progressively restricted its application by emphasizing individual circumstances, possibility of reform, and constitutional values of human dignity. Article 21 of the Constitution of India guarantees that no person shall be deprived of life or personal liberty except according to a procedure established by law. In Bachan Singh v. State of Punjab, the Supreme Court, while evolving the "rarest of rare cases" doctrine, represented a shift from absolute retribution towards individualized sentencing. In Machhi Singh & Ors. v. State of Punjab, the Supreme Court clarified that the application of the rarest of rare doctrine should take into account the motive behind the crime, personality of the victim, degree of social impact, etc. In Mithu v. State of Punjab, the Supreme Court struck down the mandatory death penalty provision under Section 303 of the Indian Penal Code holding that mandatory death sentences violated Articles 14 and 21. Thus, there is a growing convergence of judicial approach in India towards the findings of the present study.

6 Summary of the Findings

In view of the above, this paper finds that the individual actor or an offender is not truly responsible in toto for his actions- right or wrong. Physical body is an instrumentality through which the collective social presence in the psyche of the individual acts. The Law Commission of India Report 262 (2015), titled "The Death Penalty", has rightly recommended the abolition of capital punishment for all crimes in India except for terrorism-related offences and waging war against the State.

Recommendations

The foremost recommendation of this study is the complete abolition of capital punishment in India and elsewhere. The death penalty represents an irreversible form of punishment that eliminates every possibility of rehabilitation, repentance, and moral transformation. The study also suggests that criminal responsibility must be understood within a wider framework of psychological and social conditioning. Consequently, abolition of capital punishment would represent not only a humanitarian reform but also a deeper recognition of the complex nature of human consciousness, culpability, and transformation.

Conclusion:

The present study has attempted to examine capital punishment from a perspective different from conventional abolitionist arguments. The central proposition of this study is that human behaviour is not created exclusively within an isolated individual consciousness but is shaped by a complex interaction of social, psychological, cultural, environmental, and inherited influences. From the perspective of criminal jurisprudence, the principle of *Actus non facit reum nisi mens sit rea* establishes that criminal responsibility depends not merely upon the physical act but upon the mental element behind it. The present research finds that while law correctly recognizes the importance of the guilty mind, it does not sufficiently examine the origin and formation of that mind. This study, therefore, argues that even the restricted application of capital punishment remains inconsistent with the deeper objectives of criminal justice and concludes that capital punishment should be abolished as a form of punishment. There is also a growing consensus in Indian judiciary, academia and legal arena towards narrowing down the scope of death penalty. This study may prove helpful to policy & lawmakers, judges and jurists and the members of the civil society alike. In conclusion, the abolition of capital punishment represents not merely a change in penal policy but a transformation in the way society understands culpability.

Acknowledgment

I would like to express my sincere gratitude to everyone who supported and encouraged me in completing this research paper, "Capital Punishment and the Collective Nature of an Individual Human Action." The study examines capital punishment from an interdisciplinary perspective, drawing upon legal, psychological, sociological, and Indian philosophical approaches.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030439

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29 July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22123303

DOI Link:
https://doi.org/10.5281/zenodo.221233033

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Citizen Satisfaction and Infrastructure Performance in a Tier-II Indian City: Evidence from a Household Survey in Nagpur, Maharashtra

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Abstract

As India's intermediate and Tier-II cities continue to expand, municipal authorities face growing pressure to sustain reliable basic infrastructure alongside larger transport and investment projects. For most residents, however, a city is judged less by flagship schemes than by whether the road outside the house holds up after the monsoon, whether the tap runs on schedule, whether the bins are emptied, and whether the street floods when it rains hard. This paper reports findings from a household survey of 750 respondents, drawn in equal numbers of 75 from each of the ten administrative zones of Nagpur Municipal Corporation (NMC), Maharashtra, on perceptions of four such services: local roads, drinking water, solid waste collection and stormwater drainage. The picture that emerges is uneven rather than uniformly poor. Drinking water is the clear high point: in every one of the ten zones, more than 83 percent of households describe themselves as satisfied or very satisfied. Solid waste collection reaches nearly all households, though on an alternate-day rather than daily schedule in most zones. Local roads are treated as usable but middling "fair" is the single most common rating everywhere, ahead of "good" or "excellent." Stormwater drainage is the weak link: most households call it somewhat effective during heavy rain, but very few call it very effective, and a meaningful minority in every zone report it as ineffective. Read together, these patterns suggest that Nagpur's infrastructure challenge has shifted from basic coverage which appears largely achieved toward consistency, maintenance and resilience. The paper argues that citizen satisfaction data is a useful complement to, but not a substitute for, engineering and administrative performance measures, and closes with governance recommendations centred on ward-level road maintenance, more frequent waste collection in dense wards, catchment-based drainage management, and a standing mechanism for citizen feedback.

Keywords: *citizen satisfaction; urban infrastructure; municipal services; Nagpur; Tier-II cities; solid waste management; water supply; stormwater drainage; urban governance*

Introduction

India's urban story is no longer told only through its metropolitan centres. Intermediate and Tier-II cities are absorbing a growing share of population growth and outward expansion, and with that comes strain on the municipal systems that keep a city functioning day to day. The quality of that everyday infrastructure not the headline projects increasingly define how liveable a city actually is. Most residents experience municipal performance through fairly ordinary encounters: a road that stays usable through the rains, a water supply that arrives with some regularity, waste that is actually collected, and drains that can absorb an intense downpour without flooding the lane. These services rarely make the news the way a metro line or a smart-city project does, but they are what a city's day-to-day liveability is actually built on. The Ministry of Housing and Urban Affairs' Service Level Benchmarks give these services a formal evaluative structure, covering continuity and quality of water supply, efficiency of solid waste collection, and coverage of stormwater drains along with incidence of waterlogging.

Yet these technical benchmarks do not automatically tell us how residents experience the same services. Deichmann and Lall's (2007) household-level work in Indian cities found that satisfaction is shaped by actual conditions but also by expectations and by comparison with neighbouring households which means a satisfaction score cannot be read as a direct proxy for objective service quality. This distinction matters for infrastructure research.

How to Cite this Article:
Misar, G. R., & Sawarkar, M. M. (2026). Citizen Satisfaction and Infrastructure Performance in a Tier-II Indian City: Evidence from a Household Survey in Nagpur, Maharashtra. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 202–207. https://doi.org/10.5281/zenodo.22123303

A service can meet a technical benchmark and still leave residents dissatisfied because it is irregular or unevenly distributed across neighbourhoods; equally, residents can report satisfaction with a service that falls short of the formal standard. Citizen perception, in other words, is best treated as one lens among several, not as a replacement for engineering data.

Nagpur is a useful setting for this kind of study. It is the principal administrative and commercial centre of the Vidarbha region and is governed through ten administrative zones. NMC's own planning documents describe a vision built around equitable, sustainable access to urban services in a safe and liveable city — which is precisely the ambition this paper tries to test empirically.

This study therefore looks at household perceptions of four basic services — local roads, drinking water, solid waste collection and stormwater drainage — across all ten of Nagpur's administrative zones, with three aims:

1. To map household perceptions of basic municipal infrastructure across the ten zones.
2. To identify which service sectors are perceived as comparatively strong and which are comparatively weak.
3. To translate the observed pattern into practical governance and planning priorities.

Review of Literature

Municipal performance has traditionally been assessed through administrative statistics, engineering measurements and coverage indicators. These remain necessary, but they say little about whether residents actually experience a service as adequate, accessible or dependable — which is why citizen satisfaction has increasingly found its way into service-delivery evaluation.

Deichmann and Lall's (2007) analysis of Indian cities is a useful starting point precisely because it draws this line clearly: household satisfaction tracks real service conditions, but it is also coloured by expectations and by comparison with other households. Satisfaction, in their framing, is an experiential measure rather than a technical one.

Satisfaction-based evaluation has also been applied specifically to solid waste management. Raje et al. (2001) built a method for quantifying resident satisfaction with waste management and showed that citizen perception could meaningfully inform assessments of how well a collection system was actually performing.

Work on urban participation adds another dimension: Russ and Takahashi's study of Ahmedabad found that contact with municipal bodies or intermediary organisations shaped how residents experienced and complained about public services, suggesting that satisfaction is not purely a function of physical service delivery.

Water supply has drawn particular attention given its direct bearing on health and household welfare. India's service-level framework treats coverage, quantity, continuity, quality and grievance redressal as the core dimensions of urban water performance, with 135 litres per capita per day and continuous 24-hour supply as reference standards.

Taken together, this literature points to two complementary lenses for assessing municipal infrastructure: measurable service provision on one hand, and household experience on the other. This paper works primarily from the second lens, using zonal comparison to ask whether Nagpur's residents experience municipal services in broadly similar ways across the city.

Study Area

Nagpur is a major urban centre in Maharashtra and the principal administrative and commercial hub of the Vidarbha region. NMC administers the city through ten administrative zones, which for this study are:

1. Laxmi Nagar 2. Dharampeth 3. Hanuman Nagar 4. Dhantoli 5. Nehru Nagar 6. Gandhibagh 7. Satranjipura 8. Lakadganj 9. Ashi Nagar 10. Mangalwari

Using this zonal structure lets the analysis treat Nagpur as a set of comparable administrative areas rather than a single undifferentiated city, which is what makes it possible to ask whether infrastructure perceptions vary meaningfully across the municipal area. NMC's stated urban vision itself foregrounds equitable and sustainable access to services as a planning priority, which this zonal comparison is designed to test.

Methodology

1 Research Design

The study uses a descriptive design built on household-level primary survey data, with the unit of analysis being a household's perception of four municipal services: local road conditions, drinking water quality and availability, solid waste collection frequency, and stormwater drainage performance during heavy rainfall.

2 Sampling

A stratified zonal sampling framework was used, with each of Nagpur's ten administrative zones contributing 75 households.

Number of zones: 10 Households per zone: 75 Total sample: 750 households

Allocating households equally across zones was a deliberate choice to make inter-zonal comparison direct and unbiased by differences in zone population size.

3 Analytical Approach

The analysis is descriptive. Responses were converted to percentages within each zone and service category. Because every zone contributed an equal number of households, a simple mean of the ten zonal percentages also serves as an indicative city-wide figure for each category.

Satisfaction, as measured here, is not treated as equivalent to technical infrastructure performance; the results are best read as evidence of how residents perceive service delivery, alongside not instead of engineering and administrative measures.

4 Scope and Limitations of the Method

Because the analysis rests on household perception, it captures experiential rather than strictly

engineering-based performance, and it does not test statistical relationships between household characteristics and satisfaction or cross-check individual responses against municipal records. This matters because satisfaction, as noted above, is shaped by expectations and relative comparison as well as by actual conditions.

Results and Analysis

1 Local Road Network Performance

Local roads come out as the most middling of the four services surveyed. In every zone, the largest share of households rated road conditions "fair," ranging from 48.0 percent in Dharampeth and Satranjipura to 58.7 percent in Nehru Nagar. "Good" ratings ranged from 26.7 percent (Nehru Nagar) to 38.7 percent (Dharampeth), while "excellent" ratings stayed modest throughout, between 6.7 and 9.3 percent. At the other end, combined "poor" and "very poor" ratings stayed under 10 percent in every zone.

Across the ten equally weighted zones, roughly 53.4 percent of households fall into "fair," 32.0 percent into "good," and 7.7 percent into "excellent," with about 7.0 percent split across the two negative categories.

The takeaway is not that roads are failing outright, but that residents mostly view them as usable rather than good. That points toward routine maintenance and ward-level resurfacing rather than large new road-building programmes as the more pressing response to what respondents are actually reporting.

Table 1. Household Perception of Local Road Conditions

Zone	Excellent (%)	Good (%)	Fair (%)	Poor (%)	Very Poor (%)
Laxmi Nagar	8.0	30.7	54.7	4.0	2.7
Dharampeth	6.7	38.7	48.0	4.0	2.7
Hanuman Nagar	8.0	29.3	56.0	4.0	2.7
Dhantoli	6.7	33.3	50.7	5.3	4.0
Nehru Nagar	9.3	26.7	58.7	2.7	2.7
Gandhibagh	6.7	33.3	53.3	4.0	2.7
Satranjipura	8.0	37.3	48.0	4.0	2.7
Lakadganj	8.0	30.7	54.7	4.0	2.7
Ashi Nagar	6.7	30.7	54.7	5.3	2.7
Mangalwari	9.3	29.3	54.7	2.7	4.0

2 Drinking Water Supply and Quality

Drinking water is the standout performer in this survey. In every zone, over 83 percent of households reported being satisfied or very satisfied, with combined satisfaction ranging from about 83.3 percent to 88.0 percent Hanuman Nagar the highest at 88.0 percent, the rest clustered fairly close behind. "Satisfied" alone exceeded 69 percent in every zone, and "very satisfied" ranged from 10.7 percent (Ashi Nagar) to 16.0 percent (Dharampeth, Satranjipura, Mangalwari). Notably, not a single zone recorded any "very dissatisfied" responses.

Across the equally weighted sample, roughly 72.7 percent of households are "satisfied" and 13.9 percent "very satisfied," for an indicative combined figure near 86.5 percent.

This suggests water provision is perceived as comparatively established and dependable across the city though, again, that should not be read as proof that Nagpur meets every technical water-service benchmark; perception and engineering performance are simply different measures.

Table 2. Household Satisfaction with Drinking Water

Zone	Very Satisfied (%)	Satisfied (%)	Neutral (%)	Dissatisfied (%)	Very Dissatisfied (%)
Laxmi Nagar	13.3	73.3	10.7	2.7	0.0
Dharampeth	16.0	69.3	10.7	4.0	0.0
Hanuman Nagar	13.3	74.7	9.3	2.7	0.0
Dhantoli	14.7	72.0	10.7	2.7	0.0
Nehru Nagar	12.0	74.7	10.7	2.7	0.0
Gandhibagh	13.3	72.0	10.7	4.0	0.0
Satranjipura	16.0	70.7	9.3	4.0	0.0
Lakadganj	13.3	73.3	10.7	2.7	0.0
Ashi Nagar	10.7	76.0	10.7	2.7	0.0
Mangalwari	16.0	70.7	10.7	2.7	0.0

3 Municipal Solid Waste Collection

Waste collection shows wide operational reach but leans heavily on an alternate-day schedule. Alternate-day collection accounts for roughly 74.7 to 85.3 percent of households across the ten zones, while daily collection is far less common from 8.0 percent in Nehru Nagar and Mangalwari up to 18.7 percent in Dharampeth and Satranjipura. Weekly collection stays

small (4.0–5.3 percent), "rarely" is smaller still (1.3–2.7 percent), and not a single household across any zone reported "never."

Across the ten zones together, about 82 percent of households report alternate-day collection and 12 percent report daily collection.

The near-total absence of "never" responses points to a collection network that has essentially achieved coverage. What remains an open question is frequency: alternate-day collection may be adequate in lower-density areas but increasingly insufficient in denser ones. It's also worth being clear that collection frequency alone doesn't capture segregation, transport efficiency, or scientific disposal the Ministry's benchmarks treat those as distinct dimensions of solid waste management.

Table 3. Household Solid Waste Collection Frequency

Zone	Daily (%)	Alternate Day (%)	Weekly (%)	Rarely (%)	Never (%)
Laxmi Nagar	12.0	82.7	4.0	1.3	0.0
Dharampeth	18.7	74.7	4.0	2.7	0.0
Hanuman Nagar	12.0	82.7	4.0	1.3	0.0
Dhantoli	9.3	85.3	4.0	1.3	0.0
Nehru Nagar	8.0	85.3	5.3	1.3	0.0
Gandhibagh	12.0	81.3	5.3	1.3	0.0
Satranjipura	18.7	74.7	4.0	2.7	0.0
Lakadganj	12.0	82.7	4.0	1.3	0.0
Ashi Nagar	9.3	85.3	4.0	1.3	0.0
Mangalwari	8.0	85.3	5.3	1.3	0.0

4 Stormwater Drainage During Heavy Rainfall

Drainage is where the resilience gap is clearest. Most households in every zone rate drainage as "somewhat effective" during heavy rain, ranging from 69.3 percent (Dharampeth, Satranjipura) to 78.7 percent (Nehru Nagar, Mangalwari). Very few call it "very effective" 4.0 percent in eight of the ten zones, rising only to 8.0 percent in Dharampeth and Satranjipura. Negative responses are present everywhere, too: combined "ineffective" and "very ineffective" reach roughly 9.3 percent in several zones.

The indicative city-wide average, again from the equally weighted zonal sample, is about 74.9 percent for "somewhat effective" against just 4.8 percent for "very effective."

This isn't a picture of drains that don't work; it's a picture of a system that functions under ordinary conditions but isn't seen as resilient once rainfall intensifies which lines up with why national benchmarks treat drainage coverage and waterlogging incidence as distinct performance indicators. The practical implication is that preventive maintenance, desilting and identification of localised bottlenecks probably matter more here than emergency response after flooding already occurs.

Table 4. Perceived Stormwater Drainage Effectiveness

Zone	Very Effective (%)	Somewhat Effective (%)	Neutral (%)	Ineffective (%)	Very Ineffective (%)
Laxmi Nagar	4.0	77.3	10.7	4.0	4.0
Dharampeth	8.0	69.3	14.7	4.0	4.0
Hanuman Nagar	4.0	77.3	10.7	4.0	4.0
Dhantoli	4.0	73.3	16.0	2.7	4.0
Nehru Nagar	4.0	78.7	10.7	1.3	5.3
Gandhibagh	4.0	74.7	12.0	4.0	5.3
Satranjipura	8.0	69.3	14.7	4.0	4.0
Lakadganj	4.0	77.3	10.7	4.0	4.0
Ashi Nagar	4.0	73.3	16.0	2.7	4.0
Mangalwari	4.0	78.7	10.7	1.3	5.3

Comparative Discussion

Set side by side, the four sectors form a clear hierarchy of citizen perception. Drinking water sits at the top, with roughly 86.5 percent of the equally weighted sample reporting satisfaction or high satisfaction. Waste collection shows broad coverage, tempered by the dominance of alternate-day service. Roads sit in the middle, with "fair" as the modal rating in every zone. Drainage sits at the bottom in terms of high-confidence ratings, with only a small share of households calling it very effective.

Table 5. Indicative City-Wide Profile

Service	Dominant Response	Indicative Share
Drinking water	Satisfied / Very Satisfied	86.5%
Solid waste collection	Alternate-day collection	82.0%
Local roads	Fair	53.4%
Stormwater drainage	Somewhat effective	74.9%

Note: *figures are descriptive averages across the ten equally sampled zones and should not be read as population-weighted estimates.*

This pattern carries a real planning implication. Nagpur's infrastructure isn't uniformly weak it's unevenly good, with established utility services (water, and to a large extent waste collection) performing comparatively well, while maintenance-heavy, climate-exposed infrastructure (roads, drainage) scores more moderately. That cuts against a policy default that treats infrastructure mainly as a question of building more of it. Roads make the point sharply: if over half of respondents call local roads "fair" rather than "poor," the underlying issue is not access but durability and upkeep of what already exists.

Waste management tells a similar story from a different angle the collection system reaches almost every surveyed household, but the alternate-day default may not keep pace with a denser, more demanding urban population, which means the policy conversation needs to separate coverage from service intensity. Drainage is the outlier because its performance is inherently conditional on rainfall intensity: a system adequate on an ordinary day can be overwhelmed by a short, intense downpour, which argues for resilience-oriented planning rather than simple network extension.

Governance and Policy Implications

1 Integrated Stormwater Catchment Management

Drainage is the most urgent priority to come out of the survey. Rather than treating individual drains in isolation, NMC's drainage planning would benefit from treating the city as a set of interconnected catchments regular desilting, identification of chronic bottlenecks, protection of natural drainage corridors, and coordination across primary, secondary and tertiary drains. Citizen-reported problem points could be layered onto GIS mapping of flood-prone areas, drain capacity and rainfall data to build a ward-level drainage vulnerability index.

2 Ward-Level Road Maintenance

The road findings argue for shifting resources toward routine maintenance rather than concentrating spend on arterial roads alone. A systematic ward-level pavement-management programme classifying roads by condition, traffic load, drainage interaction and maintenance history would let NMC move from reactive patch repairs to preventive resurfacing on a schedule.

3 Improving Solid Waste Collection Frequency

Given how dominant alternate-day collection already is, a gradual shift toward daily collection in higher-density, higher-waste-generating wards seems like the natural next step paired with source segregation and route optimisation so frequency improvements don't just mean more trucks doing the same job less efficiently. Frequency, though, shouldn't become the only yardstick: national benchmarks also track collection efficiency, segregation, recovery and scientific disposal as separate measures worth monitoring alongside it.

4 Maintaining Gains in Water Supply

Water is clearly the strongest performer here, so the priority is consolidation rather than major intervention sustaining reliability, monitoring quality, and targeting the smaller pockets of dissatisfaction that do show up in the data, using the national service-level benchmarks on continuity, coverage, quality and grievance redressal as the reference point.

5 Institutionalising Citizen Feedback

More broadly, the study makes a case for citizen feedback as a standing input into municipal management, not a replacement for technical monitoring. A workable model would combine three streams: administrative performance data, engineering and infrastructure-condition data, and citizen perception data — a combination the wider literature supports, given that satisfaction carries real information but is also shaped by expectation and relative comparison.

Limitations of the Study

A few limitations are worth flagging plainly. First, the data is self-reported perception, which is a meaningful but not a technical measure of service quality. Second, sampling gave every zone an equal number of respondents useful for comparing zones directly, but it means the city-wide averages reported here are equal-zonal averages, not population-weighted estimates, and shouldn't be read as such. Third, the analysis is descriptive and does not test statistical significance across zones or examine how socioeconomic factors income, tenure, household size, education might relate to satisfaction. Fourth, responses were not cross-checked against municipal engineering records; combining survey data with GIS layers, rainfall records, road-condition audits, water-quality testing and municipal service logs would be a natural next step. Finally, the study covers four sectors and doesn't attempt a full liveability assessment public transport, street lighting, sewerage, healthcare, public space and digital municipal services all sit outside its scope.

Conclusion

This survey of 750 households across Nagpur's ten administrative zones shows an infrastructure picture that is neither uniformly strong nor uniformly weak, but genuinely uneven across sectors. Drinking water performs best, with consistently high satisfaction citywide. Waste collection reaches nearly everyone, though mostly on an alternate-day basis. Roads sit in the middle generally usable, but rated "fair" more than anything else, which points to a real maintenance backlog. Drainage is the clearest area of concern: functional under normal conditions, but not seen as resilient when rainfall intensifies.

The broader implication is that Nagpur's infrastructure agenda is shifting from building coverage, which appears largely achieved, to

sustaining performance and resilience under stress. That means paying closer attention to maintenance quality, service frequency, climate resilience and the differences between neighbourhoods, rather than treating infrastructure spend as a single undifferentiated line item.

It also makes a case, empirically, for treating residents as a source of planning information rather than only as recipients of services. Combined with technical and administrative data, citizen feedback sharpens rather than substitutes for evidence-based governance. For Nagpur specifically, the priorities that fall out of this analysis are fairly concrete: protect what's working in water supply, invest in road maintenance at the ward level, push waste collection toward higher frequency where density warrants it, and above all build a more preventive, catchment-based approach to stormwater management.

More generally, Nagpur's case suggests that the harder part of India's Tier-II urban challenge is no longer just building infrastructure it's making sure what already exists holds up reliably, equitably and resiliently in residents' everyday lives.

Acknowledgment

The authors sincerely express their gratitude to all those who contributed directly or indirectly to the successful completion of the research study entitled "Citizen Satisfaction and Infrastructure Performance in a Tier-II Indian City: Evidence from a Household Survey in Nagpur, Maharashtra." The study examines household perceptions of local roads, drinking water, solid waste collection, and stormwater drainage across the ten administrative zones of Nagpur Municipal Corporation.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030440

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29 July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22123454

DOI Link:
https://doi.org/10.5281/zenodo.22123454

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Constitutional Morality: Theoretical Foundations, Judicial Application, And the Future of Constitutional Law

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Abstract

Constitutional morality is a normative and interpretive doctrine that obliges state, institutions, and its citizens to be loyal to the substantive values in the workings of a constitution liberty, equality, dignity, pluralism, instead of some fleeting majoritarian or social taste. The concept, which was first seen in the writings of George Grote about Athenian democracy, and has been revived in Indian constitutionalist debates by Dr. B.R. Ambedkar, emerged in the Constituent Assembly Debates, and it has since been transformed from a moral warning about the vulnerability of constitutional government to a tool of interpretive judicial activism by constitutional courts. This paper follows the conceptual lineage of constitutional morality, contrasts constitutional morality with social or public morality, and looks at how the Supreme Court of India operationalizes constitutional morality by reference to landmark cases including Justice K.S. Puttaswamy Union of India, Indian Young Lawyers Association v. State of Kerala (the Sabarimala case), and Manoj Narula v. Union of India. It places constitutional morality in the larger context of transformative constitutionalism and weighs the main jurisprudential virtue of the doctrine its power to protect minority and individual rights against majoritarian profligation against its primary vice: definitional indeterminacy, leading to accusations of judicial subjectivity and anti-majoritarian judicial overreach. It finishes by concluding that constitutional morality despite its conceptual imprecision, plays an essential role in maintaining constitutional democracy by tying judicial review to the transformative commitment of the text as opposed to the current social consensus.

Keywords: *constitutional morality; constitutionalism, Ambedkar, transformative constitutionalism, judicial review, basic structure, fundamental rights, rule of law.*

Introduction

On the one hand, a written constitution is nothing more than a text: a document of formed provisions, articles, schedules and amendments. But seldom constitutions are self-executing. They start to survive as a means of minimal, responsible, rights-sensitive government, which lies in the capacity to operate or rather to operate prudently, faithfully, and to reasoned discord between those who exercise political authority and those who have it exercised upon them. It is this ethic towards which constitutional theorists, in the footsteps of the nineteenth-century historian George Grote, have directed their attention, and constitutional morality. It does not mean obedience to constitutional rules, it means an attitude of paramount reverence to constitutional forms, along with the liberty to judge those who exercise power in constitutional forms.

The doctrine has gained certain relevance in Indian constitutional law in the last decade and a half as the Supreme Court has begun over time to call on constitutional morality as a method of interpretation in cases involving constitutional issues of sexual orientation, religious practice, gender equality, and executive accountability. This reorientation represents a more comprehensive jurisprudential reorientation of the judicial system: the judicial system is no longer satisfied to enquire of a law whether it is procedurally valid, but whether it is true to the more normative promises of liberty, equality, dignity, and fraternity, which the constitutional text itself represents.

In this article, the authors take on a theoretical and doctrinal exploration of constitutional morality. Section 2 is conceptually inspired by the work of Grote up to Ambedkar. Section 3 formulates the analytical material of the doctrine and contrasts it with social, public or constitutional morality. Section 4 analyzes judicial application, by looking at key cases in its landmark case law. Section 5 places constitutional morality in the transformative constitutionalism theory. Section 6 critically evaluates the indeterminacy of the doctrine and the risk of judicial overreach answering. Introducing short comparative notes are closing in Section 7.

How to Cite this Article:
Gadegaonkar, R. J. (2026). Constitutional Morality: Theoretical Foundations, Judicial Application, And the Future of Constitutional Law. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 208–212. https://doi.org/10.5281/zenodo.22123454

Conceptual Origins: Between Grote and Ambedkar

Constitutional morality This term was first used by the British historian George Grote in his landmark History of Greece where he attempted to describe the one unique success that Athenian democracy had. To Grote constitutional morality implied a supreme piety towards the forms of the constitution, and the customs of open speech and action, subject to a specified legal discipline, without lawless recourse to violence. The most important point made by Grote was as follows: that the existence of any popular government must not be measured, but by a diffused disposition towards labour in it, and not to stop round it, but to labour in it, even then when it is so unconducive to the interests of the time. This notion was imported to the Indian constitutional debate with the speech on the Draft Constitution by the chairperson of the Drafting Committee of the Indian Constitution, Dr. B.R. Ambedkar, to the Constituent Assembly on 4 November 1948. Speaking in his own words, Ambedkar explained that constitutional morality is not a natural feeling within a society; it must be nurtured and the process of spreading it cannot be assumed through easy means as long as democratic constitution has been officially adopted in these societies. This anxiety of Ambedkar was not (as he saw) without historical basis: he noted that democratic constitutional government was not terribly common in human history, and that the Indian hierarchical society based on caste presented a unique challenge to the fostering of such morality, because formal political equality might be the correlate of rooted social and economic inequality.

The addition that Ambedkar made was not to make Grote's idea imported, but to broaden the concept. The constitutional morality of Grote was also mostly procedural--that is, worried about deference to the forms and institutions of the Athenian polis--but the conception of Ambedkar was given a substantive aspect. Constitutional morality to Ambedkar was not only procedural fidelity, but also the promise of transformation that the Constitution promised, the elimination of graded social inequality and the creation of a society in which liberty, equality and fraternity should be the building blocks: a society that he described as a form of associated living.

Social Morality as Versus Constitutional Morality

The analytical core of constitutional morality is that which is opposed to what social morality, popular morality or public morality is variously referred to, and this is the moral agreement of a particular society at a particular period. Social morality is conditional, either majoritarian or usually exclusionary of minority modes of living; constitutional morality, by contrast, is intended to be counter-majoritarian in specifically those cases when majoritarian will poses a threat of serious injury to the fundamental rights of individuals or groups. The doctrine then plays a certain jurisprudential role: it empowers courts to evaluate impugned legislation or executive action not in relation to the present social consensus, but in relation to the normative architecture of the Constitution itself, its Preamble, its fundamental rights, the values of dignity, autonomy and equal citizenship that permeate the text as a whole. Even though the phrase is not found in verbatim text in the Constitution, Indian courts and academics have found constitutional morality in the Preamble devotion to justice, liberty, equality and fraternity; in Part III and the guarantee of fundamental rights; in the Directive principles of State Policy in Part IV; and in the Fundamental Duties of Part IV-A. The doctrine does not work as a free-standing rule, but instead, a lens of interpretation by means of which the meaning of particular provisions is created in hard cases. These three features are present throughout accounts of the doctrine by judicial and academic observers, and can be outlined as follows: first, devotion to constitutional forms and institutional process; second, the safeguarding of majoritarian tendencies that are otherwise damaging to the rights of minorities; and third, observeance of traditional commitments to substantive ideals of dignity, equality and liberty as enshrined in the text of the constitution itself. The fourth and fifth element, the abstract reason and open criticism, and institutional responsibility, are the procedural mechanisms that maintain the first three elements not to collapse into one of paralysis or dictatorial proclamation of what the judges consider as the right.

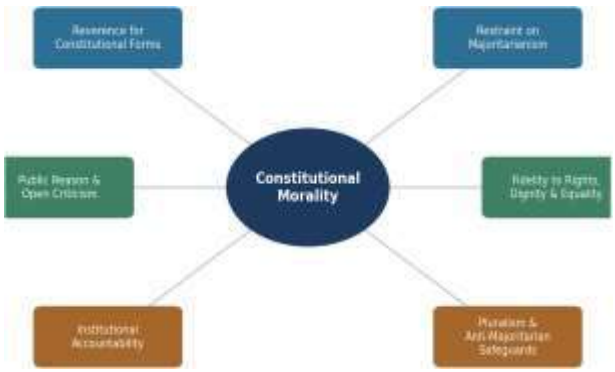


Figure 1. Basic aspects of constitutional morality as an interpretative theory.

Courts: Constitutional Morality of Landmark Case Law

This involvement of constitutional morality by the Supreme Court of India, though it existed in the previous decades in a subaltern form, was gaining doctrinal prominence since the beginning of the second decade of the twenty-first century. This can be reflected in four decisions.

Manoj Narula v. Union of India (2014)

The Court appealed to constitutional morality to emphasize that constitutional silence, in this case, whether or not persons charged with criminal offenses could be appointed as ministers was not a constitutional authorization of conduct that was inconsistent with the underlying values of the document. Constitutional morality was used to import implicit normative constraints into a provision that otherwise will lack textual constraints.

Puttaswamy v. Union of India 2017

When the nine-judge bench stated in recognition of privacy as a fundamental right under Article 21 that constitutional morality must be the governance that majoritarian governance be tempered by the regard to individual autonomy and dignity regardless of whether such autonomy is enacted in ways that are objectionable to the numerical majority. Puttaswamy provided the doctrinal basis upon which future ruling, especially Navtej Singh Johar was based.

The Navtej Singh Johar v. Union of India (2018)

In toto previously enjoyed the Indian Penal Code, an Indian 5-judge bench struck down Section 377 of the act criminalizing consensual same-sex acts between adults, overturning a prior precedent of Suresh Kumar Koushal v. Naz Foundation. When Chief Justice Dipak Misra granted that constitutional morality was not, as then thought, limited to the literal enactments of the Constitution but meant that the courts needed to accord the violation of social morality precedence to the core values of the Constitution even as against any other social morality that might prevail in society. The ruling is generally considered the best example of constitutional morality acted in an explicit way to set aside a social consensus of the majority.

The Sabarimala case: Indian Young Lawyers Association v. State of Kerala (2018) Most of the Court felt that the traditional exclusion of women of reproductive age to the Sabarimala temple could not withstand constitutional tests because constitutional morality had to override the assertion by a religious denomination to the practice being inconsistent with the equality of women as citizens. The ruling and the great public furore which succeeded the ruling, both reveal the transformative possibilities of the doctrine and the
political embarrassment it may cause when it comes into conflict with established social or religious practice.

This body of decisions, together with others, indicates a regular judicial approach: it is constitutional morality invoked just at the time when the ordinary interpretive instruments of text and precedent are exhausted, and when a court has to decide what to do with the individual rights of minority or disfavoured people or groups. An overview of the doctrinal contribution of each case is summarised in Table 1.

Table 1. Selected Supreme Court of India decisions applying constitutional morality

Case	Year	Doctrinal Contribution
Manoj Narula v. Union of India	2014	Reads implicit normative constraints into constitutional silence using constitutional morality.
Justice K.S. Puttaswamy v. Union of India	2017	Grounds the right to privacy in constitutional morality as a check on majoritarian governance.
Navtej Singh Johar v. Union of India	2018	Displaces social morality with constitutional morality to decriminalise consensual same-sex conduct.
Indian Young Lawyers Assn. v. State of Kerala (Sabarimala)	2018	Applies constitutional morality to override a religious customary practice restricting women's entry.

Transformative Constitutionalism and Constitutional Morality

The theory of transformative constitutionalism is related to constitutional morality but is analytically distinct. Karl Klare came up with the latter term in reference to a long-term endeavor of enacting, interpreting, and enforcing the Constitution upon a nation's political and social institutions and power relations in a democratic, participatory, and egalitarian way, originated in the case of post-apartheid South Africa. There has been a growing tendency in the descriptions by Indian courts of the Constitution of India, in the same terms, not as a fixed charter that merely initializes social order in 1950, but a text aimed at gradually breaking caste, gender, and religion hierarchies of the past.

Consequential: Constitutional morality provides the mode of interpretation that courts use to translate the utopian constitutional purpose of change into practical adjudicative results. The reason is that the two concepts mutually reinforce each other: transformative constitutionalism underlines why courts would be open to leave majoritarian social practice, and constitutional morality defines the substantive commitments of dignity, equality, liberty, fraternity, against which such leave-taking would be measured and justified.

Critical Appraisal: Indeterminacy and the Risk of Overreach Definitional indeterminacy is the main jurisprudential criticism of constitutional morality. Constitutional morality unlike a right which is

described textually, lacks a fixed content, and as a result it has to be developed case-by-case through judicial reasoning; here creating a danger that the doctrine turns into a vehicle of individual moral or political preference of the judges on the bench. With a view to overrule social practice or religious practice long established, critics note that when the courts call upon constitutional morality to scuttle parliamentary deliberation as well as the freedom of religious communities, as in Sabarimala, the doctrine may seem to license a kind of judicial legislation, and, in its modal form, the counter majoritarian problem may legitimately be seen to arise.

The second, corresponding issue is consistency. Since constitutional morality cannot be reduced to a determinate test, it can seem to be selective in its application: referred to in order to invalidate certain practices and not referred to in the decision of another of the same form. This contradiction, scholars say, suffices to discredit the doctrine of positing it as a principled limitation on judicial discretion as opposed to a post hoc rationalisation to justify results achieved on other bases. Such objections are weighty, but the fact that they do not, on the whole, prejudice the utility of the doctrine, does not render them invalid. All of the standards of constitutional interpretation that extend beyond bare textualism, proportionality, the basic structure doctrine, substantive due process, all have the same structural weakness of being open to indeterminacy, and all have proved invaluable in the safeguarding of rights that majoritarian politics institutionally is not predisposed to protect. The more plausible answer to the indeterminacy argument is that constitutional morality should not be used as a blank cheque or a broad license to judicial discretion but that its application must be shown to be based on particular articles in the text and the constitutional worth they represent.

Comparative Observations

Although the theory of constitutional morality has received the greatest theorisation and application in the context of Indian constitutional law, this theory, in turn, the logic of which remains that judicial review cannot and ought not to be based on evanescent majority feeling, still roots around in the context of the comparative constitutional systems. Jackson Adopting forms of transformative constitutionalism, South African courts interpret their 1996 Constitution as a social document of action and not a procedural document. Substantive due process and equal protection doctrines play a similar role in the United States, challenging majoritarian legislative decisions with constitutional values of liberty and equality, even in cases where such values are not fully determined by the text of the constitution. The comparative trend is that constitutional morality, which happens to be discussed and explained with the most explicit references in the Indian case, captures a more thorough-structural feature of rights-protecting constitutional democracies: the need to have an interpretation register that operates outside of the literal, to ensure the normative intent of the document.

Conclusion

The moral aspect of constitutional law has a very uncomfortable place, but essential in constitutional law, also known as constitutional morality. That makes it uncomfortable since its indeterminate content makes it a target of the accusation that it empowers judges to constitutionalise their own moral preferences claims in the name of neutral interpretation. The reason is that the text of a constitution is not sufficient to insure its own survival as the instrument of limited, rights-respecting government: interpretive devotion to the values best conceived as embodied in the document at all, liberty, equality, dignity, restraint of the exercise of power, must be present, unless constitutional government is to be more than the very presence of a written sheet. Ambedkar was correct in his warning in 1948, constitutional morality is not an feeling; its development, whether of courts, legislators or citizens is an ongoing project, not an accomplished success. The challenge of constitutional theory in the future is to formulate institutionalized limitations on invocation of the doctrine, to ensure constitutional morality remains an instrument to ensuring the protection of personal rights against general willfulness, instead of a licence to judicial caprice.

Acknowledgment

The author sincerely expresses gratitude to all those who contributed directly or indirectly to the completion of the research paper entitled “Constitutional Morality: Theoretical Foundations, Judicial Application, and the Future of Constitutional Law.” The study explores the conceptual foundations of constitutional morality, its relationship with social and public morality, its application by Indian constitutional courts, and its significance within transformative constitutionalism.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030441

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29 July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22123541

DOI Link:
https://doi.org/10.5281/zenodo.22123541

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Corporate Climate Disclosure in India: A Doctrinal Analysis of ESG Regulation, Corporate Accountability and Greenwashing

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Abstract
Sustainability, Environment, Governance and Social Responsibility, Climate Change and ESG Corporate Climate Disclosure: Doctrinal Study, Corporate Accountability, Greenwashing Climate change has become not only an environmental but also an economic, financial and governance issue. It has direct and indirect impact on corporate value and performance, and accordingly, investors and stakeholders are interested in receiving reliable information on climate-related risks, opportunities, and performance of companies. Corporate climate disclosure (CCD) is thus a critical tool for accountability. India has taken significant steps to regulate and standardize CCD in recent years, including mandatory Business Responsibility and Sustainability Reporting (BRSR) for major listed entities. The recent introduction of BRSR Core and assurance requirements indicates the regulator's intent to improve ESG disclosure quality and curb greenwashing practices. At the same time, stakeholders are concerned about ESG-related reporting inconsistencies, disclosure quality, value-chain reporting, and accountability. This paper analyses India's legal and regulatory framework on corporate climate disclosure, the role of BRSR/BRSR Core in promoting corporate accountability, the legal challenges of greenwashing, and BRSR's alignment with international standards (such as IFRS S2). The paper argues that while India has made progress in terms of corporate climate accountability, more work is needed in several areas.

Keywords: *Corporate Climate Disclosure, ESG, BRSR, BRSR Core, Greenwashing, Corporate Accountability, Climate Change, SEBI, Sustainability Reporting.*

Introduction

Climate change has become not only an environmental but also an economic, financial, and governance issue. Firms are significantly affected by transition risks and opportunities, making climate change accounting a critical factor influencing investor decisions. Environmental, social, and governance (ESG) reporting, including climate change-related information, is becoming an integral part of corporate reporting. Information about greenhouse gas emissions, energy performance, and climate-related risks, opportunities. Climate Disclosure promotes accountability by reducing information asymmetry between companies and investors. It allows investors to make informed decisions regarding a company's climate-related risks and whether management has appropriate strategies to address them. India has taken steps to improve ESG reporting, including mandatory Business Responsibility and Sustainability Reporting (BRSR). It has been amended and complemented by BRSR Core indicating the regulator's intent to increase transparency and combat greenwashing. This paper analyses India's legal framework on climate change disclosure and accountability in depth, focusing on BRSR, BRSR Core, greenwashing, and international sustainability standards.

Statement of the Problem

Investors rely on ESG disclosures to assess climate risks and sustainability performance. However, inconsistent reporting and greenwashing remain concerns. The key issue is whether the current framework ensures reliable disclosures and corporate accountability.

Research Questions and Research Objectives

Research Questions	Research Objectives
How has India's legal framework on corporate climate disclosure evolved?	To determine the concept and importance of corporate climate disclosure.
How does BRSR help promote transparency and accountability?	To analyze India's legal and regulatory framework on ESG reporting.
What legal issues are associated with corporate greenwashing?	To examine greenwashing as a legal and regulatory issue.

How to Cite this Article:
Chandane, A. B. (2026). Corporate Climate Disclosure in India: A Doctrinal Analysis of ESG Regulation, Corporate Accountability and Greenwashing. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 213–216. https://doi.org/10.5281/zenodo.22123541

Hypothesis

While India has made significant progress in terms of ESG and climate change-related reporting and accountability, there are still areas needing improvements, including standardization and reliability of information, addressing value-chain and Scope 3 emissions, combating greenwashing, and ensuring stronger corporate governance.

Research Methodology

The paper has used a doctrinal law-based research method. The paper will analyse India's legal and regulatory framework on corporate climate disclosure, emphasizing BRSR and BRSR Core. Attention will be paid to the challenges of greenwashing and international sustainability standards, including IFRS S2.

Literature Review

Corporate Climate Disclosure (CCD) - It is a key component of ESG reporting, helping investors assess climate-related risks, opportunities, and sustainability performance while promoting transparency and accountability.

India's ESG reporting framework – It has evolved from BRR to BRSR, improving the standardization, comparability, and quality of sustainability disclosures.

BRSR and BRSR Core – It strengthens corporate accountability by requiring structured ESG disclosures and assurance of key indicators, enhancing the reliability of reported information

Concept of Corporate Climate Disclosure



Figure 1: Corporate Climate Disclosure Framework

Source - linkedin.com/pulse/climate-disclosure-after-sec-retreat-sustainability-academy-1x2zf

Corporate climate disclosure consists of information on greenhouse gas emissions, energy performance, climate-related risks, opportunities, targets, strategies, governance, risk management, and sustainability performance. Disclosure promotes accountability and transparency, helping to reduce information asymmetry between companies and investors. Investors can make informed decisions on whether a company's climate-related risks and strategies align with their investment objectives1.

BRSR and Corporate Accountability

Level	Key Responsibility
Company Level	Implement robust ESG data collection, management, and verification systems. Integrate ESG disclosures with overall risk management rather than treating them as a standalone compliance exercise.
Board Level	Embed material ESG factors, including climate-related risks and opportunities, into the company's strategy, governance, and operations. Determine how ESG issues impact long-term business objectives.
Assurance Level	Ensure assurance providers possess the necessary expertise, competence, and independence to verify ESG disclosures. Strong assurance enhances disclosure quality and accountability.
Regulatory Level	Regulators, such as SEBI, should promote ESG accountability by monitoring disclosures and taking enforcement action, includes penalties, against companies that provide materially inaccurate or misleading ESG information.

BRSR Core and Assurance

BRSR Core focuses on a limited set of ESG indicators with appropriate assurance requirements, addressing the concerns of ESG reporting quality and accountability. Under BRSR Core, assurance is applied gradually, starting with large companies. While assurance does not ensure that the information is accurate, it makes it more likely that the information is accurate. SEBI has issued industry-specific standards for reporting BRSR Core-related information, which facilitates uniform application of BRSR Core.

Value-Chain Disclosure and Scope 3 Emissions

A company's climate change impact extends beyond its direct operations and emissions. It can have significant indirect impact on the environment, especially in terms of Scope 3 emissions. Those emissions are associated

with the entity's value chain, including suppliers, logistics providers, and other business partners. The issue of value-chain related emissions is gaining significance, and companies are being encouraged to report on Scope 3 emissions. IFRS S2 recognizes the importance of Scope 3 emissions in climate change reporting.

Greenwashing – A Regulatory Challenge

Greenwashing refers to the practice of portraying ESG performance including climate change impact in a better light than it is2. There are several manifestations of greenwashing, including selective disclosure, unsubstantiated net-zero claims, use of misleading terms omission of Greenhouse Gas Protocol, A Corporate Accounting and Reporting Standard (World Resources Institute and World Business Council for Sustainable Development, Revised Edition). material information, exaggeration of ESG performance, and presenting minor improvements as significant sustainability achievements.

Greenwashing can undermine the credibility of ESG reporting and disclosure as investors and stakeholders may be misled. In addition, honest companies may lose out to those that engage in greenwashing, as the latter may attract more clients and investors. SEBI recognizes the significance of the issue of greenwashing, which is why it has implemented regulations concerning green bonds and green debt securities.

Corporate Accountability

Level	Key Responsibility
Company Level	Implement robust ESG data collection, management, and verification systems. Integrate ESG disclosures with overall risk management rather than treating them as a standalone compliance exercise.
Board Level	Embed material ESG factors, including climate-related risks and opportunities, into the company's strategy, governance, and operations. Determine how ESG issues impact long-term business objectives.
Assurance Level	Ensure assurance providers possess the necessary expertise, competence, and independence to verify ESG disclosures. Strong assurance enhances disclosure quality and accountability.
Regulatory Level	Regulators, such as SEBI, should promote ESG accountability by monitoring disclosures and taking enforcement action, includes penalties, against companies that provide materially inaccurate or misleading ESG information.

Major Legal and Regulatory Challenges

• Lack of Complete Standardisation -While BRSR promotes standardization, climate change disclosure still involves a wide range of estimates and assumptions.

• Data Reliability - Companies may encounter challenges in obtaining accurate information from suppliers and other stakeholders affecting their operations.

• Greenwashing - There is a need for stronger regulations to address misleading ESG information. Assurance - The effectiveness of assurance depends on the expertise, independence, and access to relevant information of assurance providers.

• Compliance Costs - Compliance with ESG disclosure rules may lead to higher costs, including for small businesses and suppliers providing goods and services to larger entities.

• International Interoperability - Indian companies may have to deal with multiple reporting standards, which can be challenging and add to compliance costs.

International Perspective

IFRS S2 - International Sustainability Standards Board (ISSB) issued IFRS S1 and IFRS S2 in June 2023. IFRS S2 sets out requirements relating to climate change disclosure. It applies to all entities that use general-purpose financial reporting and reports prepared for the financial year commencing on or after 1 January 2024. IFRS S2 focuses on climate-related risks and opportunities3. According to IFRS S2, entities must disclose climate-related risks and opportunities affecting their business, considering the following areas:

1.Governance 2. Strategy 3. Risk Management 4. Metrics and Targets

Findings

- India has made significant progress in terms of ESG reporting reforms
- BRSR has improved standardization and transparency of ESG reporting
- Introduction of BRSR Core and assurance requirements promotes higher ESG disclosure quality
- Greenwashing is a major regulatory concern along with Scope and value-chain-related emissions disclosure
- International standards, such as IFRS S2, provide useful guidance on ESG disclosure

Recommendations

Recommendations	Key Action
Comprehensive Anti - Greenwashing Standards	Clearly define greenwashing and prescribe penalties for misleading ESG claims.

Recommendations	Key Action
Stronger Board Oversight	Ensure boards integrate ESG and climate-related risks into corporate strategy and decision-making.
Improved Assurance	Require ESG assurance providers to possess adequate expertise and independence.
Stepped-up Scope 3 Reporting	Introduce phased and mandatory reporting of value-chain for Scope 3 emissions.
International Alignment	Align Indian ESG standards with global frameworks such as IFRS S2 for greater consistency and comparability.

IFRS S2 recognizes the importance of Scope 3 emissions and value-chain reporting in climate disclosures

Conclusion

Corporate climate disclosure has come a long way in terms of becoming an integral part of corporate governance and securities regulation. Climate change entails significant physical and transition risks for corporations, which, in turn, affects their bottom line and determines investor decisions. Therefore, climate-related information must be delivered to the market in an effective and reliable manner to ensure transparency and efficiency of capital flows. The Indian approach to the problem of corporate climate disclosure has led to the appearance of such concepts as BRSR and BRSR Core, which signify the country's attempts to impose stricter ESG-related reporting requirements on corporations. It is vitally important to ensure that corporate climate disclosure remains a tool to improve accountability and transparency, as well as facilitate the delivery of climate-related risks to both shareholders and stakeholders. It can be argued that the ultimate objective of India's ESG-related regulation should be to serve a dual purpose of enhancing transparency and promoting sustainable development both within the domestic economy and the global environment.

Acknowledgment

The author sincerely expresses gratitude to all those who contributed directly or indirectly to the completion of the research paper entitled "Corporate Climate Disclosure in India: A Doctrinal Analysis of ESG Regulation, Corporate Accountability and Greenwashing." The study examines India's evolving framework for corporate climate disclosure, with particular emphasis on ESG reporting, BRSR, BRSR Core, corporate accountability, greenwashing, value-chain emissions, and international standards such as IFRS S2.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030442

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29 July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22123822

DOI Link:
https://doi.org/10.5281/zenodo.22123822

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India-China Defence Capabilities and Strategic Deterrence: A Comparative Study of India's Preparedness for Emerging Security Challenges in The Changing Geopolitical Order

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Abstract

The contemporary international order is increasingly shaped by military power, technological competition, strategic deterrence, and geopolitical rivalry. In this changing environment, China's growing military, economic, and technological capabilities have significant implications for India's national security, particularly in the context of the unresolved boundary dispute, tensions along the Line of Actual Control (LAC), and strategic competition in the Indo-Pacific. This study comparatively examines the defense capabilities of India and China with reference to defense expenditure, conventional military strength, air and naval power, nuclear deterrence, missile systems, cyber and space capabilities, border infrastructure, logistics, and indigenous defense production. Rather than predicting a future conflict, it assesses India's capacity to deter and respond to potential strategic and military pressure from China. Using a descriptive, comparative, and analytical approach based primarily on secondary sources, the study argues that numerical military superiority alone does not determine strategic outcomes. Geography, operational preparedness, technological resilience, economic capacity, nuclear deterrence, maritime advantages, defense self-reliance, and strategic partnerships collectively influence the balance of power. The study ultimately seeks to identify India's critical capability gaps and strategic requirements for strengthening credible deterrence and long-term national security.

Keywords: *India–China Relations, Defence Capability, National Security, Strategic Deterrence, Military Power, LAC, Indo-Pacific, Nuclear Deterrence*

Introduction

The contemporary international order is undergoing significant geopolitical transformation, marked by renewed great-power competition, regional conflicts, military modernization, and rapid technological change. Recent conflicts in Europe and the Middle East have demonstrated that military capability and strategic deterrence continue to remain important instruments of national security despite economic interdependence and the presence of international institutions. In this context, the rise of China as a major economic, military, and technological power has significantly altered the strategic environment of Asia and the Indo-Pacific. India and China are two major Asian powers possessing nuclear weapons, large armed forces, growing economies, and significant geopolitical influence However, their relationship continues to be affected by an unresolved boundary dispute and competing strategic interests. The military confrontation in eastern Ladakh since 2020, particularly the Galwan Valley clash, highlighted the continuing possibility of serious tensions along the Line of Actual Control (LAC). Although subsequent diplomatic and military-level negotiations have contributed to disengagement at several friction points, the broader challenge of maintaining stable and peaceful borders remains strategically important for India. China's sustained military modernization, expanding naval presence, missile capabilities, advances in cyber and space technologies, and growing strategic influence in the Indo-Pacific have important implications for India's security environment. At the same time, India has strengthened border infrastructure, modernized its armed forces, expanded indigenous defence production, enhanced its maritime capabilities, and developed strategic partnerships with countries such as the United States, Japan, Australia, and France. Therefore, a meaningful comparison of India and China's defence capabilities cannot be confined merely to military expenditure, troop strength, aircraft, warships, or nuclear arsenals.

How to Cite this Article:
Waghmare, S. I. (2026). India–China Defence Capabilities and Strategic Deterrence: A Comparative Study of India's Preparedness for Emerging Security Challenges in The Changing Geopolitical Order. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 217–222. https://doi.org/10.5281/zenodo.22123822

Against this background, the present study comparatively examines the defence capabilities of India and China and assesses India's preparedness, strengths, vulnerabilities, and strategic options for maintaining credible deterrence and safeguarding its long-term national security.

Statement of the Research Problem and Significance of The Study

The rapid expansion and modernization of China's military capabilities have created significant strategic challenges for India. The unresolved boundary dispute, recurring tensions along the Line of Actual Control (LAC), China's growing presence in the Indian Ocean, and its advances in missile, cyber, space, and emerging military technologies have widened the scope of security competition between the two countries. Although India has strengthened its military preparedness, border infrastructure, indigenous defence production, and strategic partnerships, a considerable asymmetry continues to exist in several dimensions of national and military power.

The central research problem, therefore, is to determine the nature and extent of the defence capability gap between India and China and to assess India's ability to maintain credible deterrence against potential strategic and military pressure. Such an assessment is significant because national security depends not merely on numerical military strength but also on geography, operational readiness, technology, logistics, economic resilience, nuclear deterrence, maritime capability, and strategic partnerships. A comprehensive comparative analysis can thus help identify India's relative strengths, critical vulnerabilities, and long-term strategic requirements in the evolving Asian security environment.

Objectives of the Study and Research Questions

Objectives Of the Study

1. To comparatively examine the overall defence capabilities of India and China, with particular reference to land, air, naval, nuclear, missile, cyber, and space capabilities.
2. To analyze the major areas of asymmetry between India and China in defence expenditure, military modernization, technology, infrastructure, logistics, and defence production.
3. To assess the strategic significance of Himalayan geography, the Line of Actual Control (LAC), and the Indian Ocean Region in shaping the India–China military balance.
4. To evaluate India's existing capacity to maintain credible deterrence and respond effectively to potential strategic and military pressure from China.
5. To identify India's major strengths and capability gaps and suggest measures for strengthening its long-term defence preparedness and national security.

Research Questions

1. What are the major similarities and differences between the defence capabilities of India and China?
2. To what extent can India's geographical advantages, nuclear deterrence, maritime capabilities, and strategic partnerships compensate for the existing military asymmetry with China?
3. What strategic measures are necessary for India to strengthen credible deterrence and long-term preparedness against emerging security challenges from China?

Research Methodology

The present study adopts a descriptive, comparative, and analytical research approach to examine the defence capabilities of India and China. The study is primarily based on secondary data obtained from official government documents, defence reports, international security databases, strategic research institutions, books, research journals, and other credible academic sources. For comparative analysis, selected indicators such as defence expenditure, land and air power, naval capabilities, nuclear and missile forces, cyber and space capabilities, border infrastructure, logistics, defence technology, and indigenous defence production have been considered. Strategic variables including Himalayan geography, the Line of Actual Control (LAC), the Indian Ocean Region, and India's international strategic partnerships are also incorporated into the analysis. The study does not attempt to predict the outcome of a hypothetical India–China war. Instead, the available evidence is comparatively analyzed to identify relative strengths and capability gaps and to assess India's capacity to maintain credible deterrence and respond effectively to emerging security challenges from China. Wherever required, data from internationally recognized sources such as the Stockholm International Peace Research Institute (SIPRI), along with official reports of the Government of India and other credible strategic institutions, are used to ensure reliability and analytical consistency.

India–China Defense Expenditure and Overall Military Capability

Defence expenditure provides an important, though not complete, indicator of a country's military capacity. According to SIPRI, China was the world's second-largest military spender in 2025, with an estimated expenditure of **US$336 billion**, representing an increase of 7.4 per cent over 2024. India ranked fifth globally, with military expenditure of **US$92.1 billion**, an increase of 8.9 per cent during the same period. Thus, China's estimated military expenditure was more than three-and-a-half times that of India, indicating a substantial resource asymmetry between the two countries.

China's financial advantage has supported sustained military modernization across multiple domains. Its investments increasingly focus on advanced conventional weapons, naval expansion, missile forces, nuclear capabilities, cyber warfare, space systems, and emerging technologies. The continuous rise in Chinese military expenditure has enabled the People's Liberation Army (PLA) to pursue long-term technological and operational modernization.

However, defence expenditure alone should not be equated with actual military effectiveness. SIPRI itself emphasizes that military expenditure is primarily an input measure and is not directly equivalent to military capability or security. In the India–China context, therefore, numerical and financial superiority must be assessed alongside geography, operational deployment, logistics, combat experience, technological capability, defence-industrial capacity, and nuclear deterrence.

Consequently, China possesses a significant overall advantage in financial resources and the scale of military modernization, while India's strategic position cannot be evaluated solely through the expenditure gap. India's geographical position, experience in high-altitude operations, growing maritime capabilities, nuclear deterrence, and expanding defence partnerships provide important balancing factors. The actual strategic balance between India and China is therefore multidimensional rather than purely numerical.

Comparative Analysis of Land and Air Power

Land power remains particularly important in India–China strategic competition because their principal territorial dispute is concentrated along the high-altitude Line of Actual Control (LAC). China has developed a large and increasingly modernized ground force under the People's Liberation Army (PLA), with greater emphasis on combined-arms operations, mobility, long-range firepower, and joint warfare. The PLA's Western Theater Command is specifically responsible for operations related to India and includes major ground, air, and missile-force formations. Chinese forces have also conducted live-fire and mobility exercises in high-altitude and low-oxygen environments to improve preparedness for mountainous conflict.

India, however, possesses an important operational advantage in the form of sustained deployment and experience in high-altitude and mountainous terrain. Following the Eastern Ladakh crisis of 2020, India strengthened troop deployment, surveillance, logistics, roads, bridges, tunnels, and other border infrastructure along the northern frontier. Thus, although China enjoys advantages in the overall scale and technological resources of its ground forces, the Himalayan terrain makes rapid large-scale operations difficult and increases the importance of logistics, acclimatization, infrastructure, and local operational preparedness.

Air power is equally significant because it can rapidly support ground operations, conduct precision strikes; transport troops and supplies, and provide surveillance across difficult terrain. China's People's Liberation Army Air Force (PLAAF) has undergone substantial modernization and possesses advanced combat aircraft, unmanned systems, long-range strike capabilities, and increasingly integrated air-defence systems. China has also continued to improve aviation infrastructure in Tibet, potentially strengthening its ability to operate aircraft closer to the India–China frontier.

India's air power, nevertheless, remains a significant balancing factor. The Indian Air Force operates from several bases relatively close to the Himalayan theatre and possesses combat platforms such as the Rafael and Su-30MKI, supported by air-defence, transport, surveillance, and precision-strike capabilities. In a limited high-altitude confrontation, geography and the location of air bases can influence the effective employment of air power. Therefore, China's larger overall military resources do not automatically translate into proportionate operational superiority along the LAC. The land-air balance is ultimately shaped by preparedness, logistics, infrastructure, joint operations, technological capability, and the ability to sustain forces in difficult Himalayan conditions.

Comparative Naval Power and The Indian Ocean Dimension

Naval power has become an increasingly important dimension of India–China strategic competition. China possesses the world's largest navy in numerical terms. According to the U.S. Department of Defense, the People's Liberation Army Navy (PLAN) had a battle force of more than 370 platforms, including surface combatants, submarines, amphibious ships, aircraft carriers, and fleet auxiliaries, with continued expansion projected in the coming years. This expanding naval capability enhances China's capacity for power projection beyond its immediate maritime neighborhood and supports its growing presence across the Indo-Pacific.

However, the Indian Ocean presents a different strategic environment. India's central geographical position in the Indian Ocean Region (IOR), its long coastline, island territories, and proximity to major sea lanes provide significant strategic advantages. Nearly 90 per cent of India's trade by volume moves through maritime routes, making maritime security a vital component of its national security. India has consequently strengthened its naval capabilities through aircraft carriers, destroyers, frigates, submarines, maritime surveillance aircraft, and an expanding programme of indigenous warship construction.

India's operational preparedness in the Indian Ocean was demonstrated during TROPEX-25, which involved approximately 65 Indian naval ships, nine submarines, and more than 80 aircraft, including INS Vikrant, Kalvari-class submarines, P-8I maritime patrol aircraft, and other advanced platforms. India has also expanded maritime cooperation with Indian Ocean countries through joint exercises, coordinated patrols, information sharing, capacity building, and humanitarian assistance.

Thus, China possesses a clear advantage in the overall numerical size and global expansion of its navy, but India retains important geographical and operational advantages within the Indian Ocean Region. India's ability to strengthen maritime surveillance, submarine and anti-submarine warfare, carrier-based aviation, indigenous shipbuilding, and partnerships with regional powers can therefore serve as an important

balancing element in the broader India–China strategic equation.

Nuclear Deterrence, Missile, Cyber and Space Capabilities

Nuclear deterrence constitutes a crucial dimension of the India–China strategic balance. According to SIPRI, China possessed an estimated **620 nuclear warheads**, while India's nuclear inventory was estimated at approximately **190 warheads** at the beginning of 2026. China therefore maintains a substantial numerical advantage and is rapidly modernizing and expanding its nuclear arsenal. India, despite possessing a considerably smaller arsenal, follows a doctrine of **credible minimum deterrence and No-First Use**, emphasizing retaliatory capability rather than numerical parity. Consequently, nuclear weapons impose significant constraints on the escalation of any large-scale conventional conflict between the two nuclear-armed states.

Missile capability further influences this strategic equation. China has developed an extensive range of ballistic and cruise missile systems and continues to strengthen land-, sea-, and air-based nuclear delivery platforms. India has similarly pursued the development of longer-range delivery systems, with increasing emphasis on the capability to reach strategic targets across China. Thus, while China possesses greater quantitative and technological depth, India's survivable retaliatory capability remains central to maintaining credible deterrence.

Modern strategic competition also extends beyond conventional and nuclear forces into cyber and space domains. China has invested significantly in cyber warfare, electronic warfare, counter-space systems, military satellites, and integrated information-based operations. India has also expanded its military space, satellite, cyber-security, and emerging technological capabilities, although the scale of China's investment and institutional integration remains considerably larger.

Overall, China possesses a clear quantitative advantage in nuclear forces and broader technological capabilities. However, strategic stability between India and China does not require numerical equality. For India, a survivable nuclear deterrent, reliable command and control, effective missile forces, resilient cyber and space infrastructure, and continued technological modernization are more important for maintaining credible deterrence and reducing strategic vulnerability.

Geography, Border Infrastructure and Logistics

Geography is a critical factor in determining the operational balance between India and China. Much of the Line of Actual Control (LAC) passes through extremely high-altitude Himalayan terrain, where severe weather, low oxygen levels, limited accessibility, and difficult topography impose significant constraints on large-scale military operations. Consequently, the ability to rapidly mobilize troops, maintain supply lines, and sustain forces at high altitudes is as important as the numerical strength of the armed forces.

China has substantially improved transport and military-support infrastructure in its western regions, including roads, railways, airfields, logistics facilities, and communication networks. The Western Theater Command has continued to strengthen its ability to operate in high-altitude conditions, including through specialized training and infrastructure development. Such infrastructure provides China with greater mobility and facilitates the movement of personnel and military equipment towards the border areas.

India has responded by accelerating the development of strategic infrastructure along its northern borders. The Border Roads Organization (BRO) has significantly expanded the construction of roads, bridges, tunnels, and airfield-related infrastructure in difficult border regions. Major projects such as the **Atal Tunnel and Sela Tunnel** have improved all-weather connectivity and the movement of troops and logistics towards strategically important areas. Improved connectivity has reduced travel time and enhanced India's ability to sustain military deployments along the northern frontier.

Nevertheless, infrastructure alone cannot determine the operational balance. India's long experience of high-altitude deployment, forward positioning of forces, improved surveillance, and development of logistics networks provide important advantages, while China's larger infrastructure base and technological resources remain significant strengths. Therefore, the Himalayan military balance depends largely on the speed of mobilization, logistical sustainability, intelligence and surveillance, infrastructure resilience, and the capacity to maintain forces for prolonged periods under extreme climatic conditions.

Strategic Partnerships and Defence Self-Reliance

India's strategic partnerships and growing defence self-reliance constitute important balancing factors in its security relationship with China. India has strengthened cooperation with the United States, Japan, and Australia through the Quad, which promotes a free and open Indo-Pacific and has expanded cooperation in maritime security, logistics, critical technologies, and regional resilience. India has simultaneously maintained defence partnerships with other major powers, thereby preserving its broader policy of strategic autonomy.

Equally important is India's effort to reduce dependence on foreign defence supplies. India's indigenous defence production reached a record **₹1.78 lakh crore in FY 2025–26**, reflecting the expanding role of domestic public and private defence industries. Defence exports also increased to a record **₹38,424 crore** during the same financial year. These developments indicate a gradual strengthening of India's defence-industrial base.

However, strategic partnerships cannot substitute for indigenous military capability. India's long-term deterrence against China will depend on combining international cooperation with domestic technological innovation, resilient supply chains, advanced weapons development, and sustained defence manufacturing. Defence self-reliance therefore remains essential not

only for military modernization but also for India's strategic autonomy and ability to sustain prolonged security challenges.

Major Findings and Strategic Recommendations

The comparative analysis reveals that China possesses a substantial advantage over India in defence expenditure, overall military scale, naval strength, missile forces, nuclear arsenal, and advanced technological capabilities. However, this asymmetry does not automatically translate into decisive operational superiority in every potential theatre. Himalayan geography, India's experience in high-altitude operations, its favourable position in the Indian Ocean, nuclear deterrence, and expanding strategic partnerships provide important balancing advantages.

India's principal challenge is therefore not to achieve numerical parity with China, which would be economically difficult and strategically unnecessary, but to develop a credible and sustainable deterrent capability. Priority should be given to accelerating military modernization, strengthening surveillance and intelligence along the LAC, improving border infrastructure and logistics, and enhancing air and missile defence. India should further expand naval and submarine capabilities to utilize its geographical advantages in the Indian Ocean.

Greater investment in cyber warfare, space-based surveillance, artificial intelligence, drones, electronic warfare, and precision-strike capabilities is equally necessary. At the same time, strengthening indigenous defence production and reducing critical technological dependence should remain central to India's long-term strategy. Strategic partnerships, particularly in the Indo-Pacific, should complement rather than replace indigenous capability. A combination of military preparedness, technological resilience, economic strength, strategic partnerships, and sustained diplomatic engagement can provide India with a more credible and durable deterrence posture.

Conclusion

The comparative analysis demonstrates that China possesses a substantial overall advantage over India in defence expenditure, military scale, technological capabilities, missile forces, naval expansion, and nuclear arsenal. However, national defence capability cannot be assessed solely through numerical superiority. Geography, operational preparedness, logistics, nuclear deterrence, maritime position, economic resilience, indigenous defence capacity, and strategic partnerships collectively influence the actual balance of power.

India's strategic objective, therefore, should not be to achieve complete military parity with China, but to develop a credible, resilient, and sustainable deterrence capability. India's advantages in Himalayan operational experience, geographical position in the Indian Ocean, nuclear deterrence, expanding defence industry, and international partnerships provide significant foundations for such a strategy. Continued military modernization, technological innovation, border preparedness, maritime capability, and defence self-reliance will remain essential. Ultimately, a combination of credible military deterrence, economic strength, strategic autonomy, diplomatic engagement, and technological resilience offers India the most effective framework for safeguarding its sovereignty and long-term national security.

Acknowledgment

I would like to express my sincere gratitude to all those who contributed, directly or indirectly, to the completion of this research paper entitled "India–China Defence Capabilities and Strategic Deterrence: A Comparative Study of India's Preparedness for Emerging Security Challenges in the Changing Geopolitical Order." The study examines the comparative defence capabilities of India and China, including military power, strategic deterrence, nuclear and missile capabilities, cyber and space domains, border infrastructure, logistics, and defence self-reliance.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030443

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22124065

DOI Link:
https://doi.org/10.5281/zenodo.22124065

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Advancing Multidisciplinary Research and Societal Development Through Education for Sustainable Development

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Abstract
Education is a fundamental driver of social, economic, environmental, and cultural development. In the context of the Sustainable Development Goals (SDGs), education is not only an independent development objective. It explores the integration of environmental awareness, social responsibility, technological innovation, economic skills, community participation, and inclusive education within educational systems. Therefore, collaboration among education, science, technology, economics, social sciences, environmental studies, and public policy is essential. It proposes a multidisciplinary framework based on curriculum integration, experiential learning, digital technologies, educator capacity building, community partnerships, and evidence-based policy. The study designed around interdisciplinary knowledge and real-world problem-solving can develop learners who are capable of contributing meaningfully to sustainable communities and long-term societal transformation.

Keywords*: Education for Sustainable Development (ESD), Sustainable Development Goals (SDGs), Multidisciplinary Research, Societal Development, Environmental Education, Inclusive Education, Digital Education, Community Participation, National Education Policy (NEP) 2020, Eco-Clubs.*

Introduction

Research is a careful and orderly study of a subject. Its goal is to find new facts, test ideas, or learn more about a topic. It is important because it drives medical cures, technological growth, smart business choices, and informed public laws. Without research, society cannot progress. It is important because it drives medical cures, technological growth, smart business choices, and informed public laws. Without research, society cannot progress. It is important because it drives medical cures, technological growth, smart business choices, and informed public laws. Without research, society cannot progress. The purpose of research varies based on whether it is classified as basic or applied, and each category contains multiple distinctions. basic facts. Advanced technology development that creates new technology or demonstrates the viability of applying existing technology to new products and processes in a general way. Advanced research is most closely analogous to precompetitive technology development in the commercial sector because the work is not so coupled to specific products and processes that the results of the work must be proprietaryAdvanced multidisciplinary research combines tools and ideas from different subjects like science, engineering, and social studies to solve complex real-world problems. It helps teams build new ideas by using methods from more than one field of study. The main purpose of advanced multidisciplinary research is to solve complex, real-world problems that a single academic discipline cannot address alone. By blending knowledge, tools, and methodologies from distinct fields, it breaks down academic silos to create comprehensive, practical solutions.in educational field also the advanced multidisciplinary research plays vital role. The primary purpose of advanced multidisciplinary research in education is to optimize how humans learn and how educational systems operate by incorporating insights from psychology, neuroscience, technology, sociology, and economics. Education is too complex for one discipline to solve; understanding a student requires looking at their brain, their environment, their tools, and their socioeconomic background Multidisciplinary research transform education by breaking down traditional academic boundaries to create smarter, fairer, and more adaptive learning environments. It shifts education from a "one-size-fits-all" lecture model into a dynamic, data-driven, and scientifically grounded system. Societal development is the continuous process of positive change, growth, and transformation in human societies

How to Cite this Article:
Bhoje, P. R. (2026). Advancing Multidisciplinary Research and Societal Development Through Education for Sustainable Development. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 223–226. https://doi.org/10.5281/zenodo.22124065

It involves improving how people live together by upgrading institutions, strengthening cultural norms, expanding economic and social capital, and raising the overall quality of life for all citizens Reducing poverty, creating fair jobs, and building sustainable wealth and resources Strengthening laws, traditions, justice, human rights, and civic participation. Removing barriers so marginalized or disadvantaged groups can access equal opportunities. Fostering peace in the society, trust, cooperation, and mutual respect among diverse community members. Balancing present human needs with long-term environmental and systemic health. Development through education is the strategic process of using learning and knowledge acquisition to drive individual advancement and broader societal transformation. Education is the foundational mechanism that transforms human potential into active social, economic, and cultural progress. Education equips people with technical, vocational, and professional skills that increase earning potential and break cycles of poverty. It also Develops critical thinking, problem-solving, literacy, and analytical skills necessary for navigating modern life. It Improves health literacy, leading to better nutrition, active lifestyle choices, and lower mortality rates. Education **b**uilds self-confidence, agency, and the capacity to make informed life decisions. the modern education system faces critical flaws that can hinder rather than help students. Today's challenges often stem from high costs, outdated structures, and intense psychological pressureHigher education costs have skyrocketed, forcing students into massive, long-term loan burdens before they start earning Curricula change slowly, leaving graduates with theoretical knowledge but without the practical, tech-driven skills employer's demand. and constant competition breeds anxiety, burnout, and depression. A university degree is no longer a guarantee of employment, leading to mass underemployment where graduates work jobs that do not require degrees. As classrooms move online, students without high-speed internet or expensive devices fall behind, educational inequality. today the sustainable development term is used worldwide. Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It is a blueprint for achieving a better and more sustainable future for everyone by balancing economic, social, and environmental goalsEducation for Sustainable Development (ESD) is a specific educational framework that empowers people to change the way they think and work to build a sustainable future. It directly drives societal development by transforming how individuals interact with their economies, environments, and communities. ESD teaches them to conserve them, shifting society's cultural values toward environmental respect. It trains future leaders and citizens to consider the 50-year consequences of current decisions, preventing short-sighted policy-making.

ESD introduces green chemistry, renewable energy engineering, circular economy principles, and sustainable agriculture into classrooms. Students learn to design products that do not generate waste, driving economic development that doesn't destroy the planet. By teaching resource management and climate resilience, ESD gives vulnerable populations the tools to protect their local environments and livelihoods.

Leading the world in implementing ESD policies?

In India, Education for Sustainable Development (ESD) has transitioned from standard "environmental studies" to a deeply integrated, legally backed national framework. Driven by the **National Education Policy (NEP) 2020**, India aligns its entire schooling and higher education system with the UN's Sustainable Development Goal (SDG) Target.TheNEP2020 forms the spine of India's current ESD framework. Rather than keeping sustainability as a separate, memorized subject, it embeds the concepts directly into everyday learning

Themes like climate change, resource conservation, and biodiversity are woven organically into traditional subjects like Mathematics, History, and Science. Rote learning is replaced with localized field work, composting projects, water audits, and community-based mapping.

Students are taught traditional Indian cultural roots of sustainability the world is one family combined with modern ethical obligations toward the planet.

India's approach to ESD relies heavily on specialized institutional bodies working across states:

Centre for Environment Education (CEE)established in 1984 under the Ministry of Environment, Forest and Climate Change, the CEE has pioneered ESD toolkits and teacher training manuals across India for decades. **NCERT & SCERTs** National and state councils design textbooks (like the updated frameworks under the National Curriculum Framework) to ensure localized sustainability problems are visible to students.

Universities like Bharati Vidyapith Pune ope rate dedicated ESD leadership programs to mentor teachers, NGOs, and government professionals

The Eco-Clubs (National Green Corps) Operating in over 100,000 schools across India, Eco-Clubs engage students in direct actions like tree plantation drives, plastic-free campaigns, and managing school kitchen gardens.

The University Grants Commission (UGC) mandates modules on environmental studies for all undergraduate courses, moving technical and commerce graduates toward "green skills" and eco-conscious entrepreneurship

Despite robust policy declarations, India faces specific hurdles in universal execution. The implementing standardized, experiential ESD across millions of schools with massive language, infrastructure, and resource disparities remains tough. A shift from textbook-centric grading to action-focused grading requires intensive, ongoing training for millions of educators. Modern ESD toolkits increasingly rely on digital portals, leaving remote rural classrooms heavily reliant on older, theoretical textbooksSpecific examples of **Eco-Club activities** run by Indian schools ESD India

The Leading Provider of Temperature Transmitters and The Reputed Temperature measurement and Control Instrument Manufacturer in India,22 Mar 2018 the Decade of Education for Sustainable Development (2005-2014) saw the emergence of ESD and brought together practitioners from a Bharati Vidyapeeth. The ESD-Leadership is a blended-learning programme for interested professionals from government, academia, NGOs, school administration Show allIn India, school Eco-Clubs—primarily managed under the **National Green Corps (NGC)** and the updated **Eco Clubs for Mission Life (Lifestyle for Environment)** portal—engage over **10 lakh (1 million) schools** in practical, experiential sustainability tasks. Rather than focusing on textbooks, these clubs turn environmental education into action. The core activities taking place in Indian schools include**Waste Management & The "Best Out of Waste" Practice**

Students collect mid-day meal kitchen waste and dry leaves from the school grounds to maintain organic compost pits, creating natural fertilizer for the campus gardens. **Workshops:** Students turn domestic waste (like plastic bottles, old tires, pencil shavings, and leftover cloth) into planters, pen stands, or masks. Eco-club "cadets" lead campaigns to completely ban plastics in school canteens, replacing them with cloth, jute, or copper alternatives.

Biodiversity and Greenery Campaigns

The "Ek Ped Maa Ke Naam" Drive: A major recent national campaign where eco-clubs have planted crores (tens of millions) of saplings across Indian school campuses

Miyawaki Urban Forests & Herbal Gardens: Schools use dense, fast-growing Japanese Miyawaki techniques to create miniature forests or maintain medicinal herbal gardens on school grounds.

QR Codes for Flora: Students create digital tags and generate QR codes for campus trees, mapping the local biodiversity so fellow classmates can scan and learn about local plant species.

Water and Energy Audits: Students act as "Water Detectives," auditing school taps for leaks, measuring daily water consumption, and managing localized **Rainwater Harvesting** systems.

E-Waste Collection Drives: Setting up dedicated bins to gather discarded batteries, cables, and old electronics from homes to ensure they go to certified recyclers instead of landfills.

Ecological Festivals: Creating eco-friendly Rangolis that highlight messages like "Save Water", and learning the lifecycle of traditional festive idols to build biodegradable alternatives.

Green Summer Camps: Hands-on workshops during school holidays focusing on nature photography, wildlife documentaries, and climate change webinars.

Nukkad Nataks (Street Plays) Students perform short, dramatic plays in local neighbour hoods to raise awareness about air pollution, water conservation, and plastic hazards.

1. Financial Support and Grants

Direct Annual Grants: The MOEFCC has traditionally extended an **annual grant of 5,000 per Eco-Club** (with targets typically set up to 500 schools per district). This fund covers basic execution costs like buying saplings, manufacturing compost bins, and setting up waste segregation stations. The ministry partners with State Nodal Agencies (such as State Pollution Control Boards or state environment departments) and non-recurring **Grants-in-Aid** to organize wide-scale student activities.

Travel and Camp Funding: Under the National Nature Camping Programme (NNCP), the MOEFCC provides additional financial assistance for organizing student **nature camps and field trips** to protected areas, tiger reserves, and national park. The ministry finances regular capacity-building workshops and refresher training courses for ensuring they transition from theoretical textbook grading to hands-on environmental mentoring. Schools receive multimedia kits, wildlife screening assets, data-collection logs for campus resource audits (water/energy), and step-by-step blueprints for setting up eco-infrastructure like rainwater harvesting systems.

Department of Environment-

To create environmental awareness among the school & college students for environmental improvement and to inculcate the culture In India, public welfare and educational funding are divided into two main structures, Central Sector Schemes (100% funded by the central government) and centrally Sponsored Schemes **(CSS)**. The revamped Environment Education, Awareness, Research and Skill Development (EEARSD) umbrella—which funds school Eco-Clubs—primarily operates as a Central Sector framework where funds are disbursed straight down to designated State Nodal Agencies. However, State Governments routinely step in with matching grants, top-ups, and co-funding models to expand the reach of this green scheme.

Acknowledgement

I would like to express my sincere gratitude to all those who have supported and encouraged me in completing this research paper on “Advancing Multidisciplinary Research and Societal Development Through Education for Sustainable Development.” The study emphasizes the importance of multidisciplinary research, Education for Sustainable Development (ESD), Sustainable Development Goals (SDGs), inclusive education, digital learning, and community participation.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030444

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22160403

DOI Link:
https://doi.org/10.5281/zenodo.22160403

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A Comprehensive Review of Digital Marketing Strategies

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Abstract

The exponential progress of digital technologies has reshaped the global e-commerce landscape, driven innovation and creating both opportunities and challenges for businesses. This paper delivers an in-depth analysis of digital marketing strategies, including search engine optimization (SEO), social media engagement, content marketing, email marketing, and emerging technologies like artificial intelligence (AI), block chain, and augmented reality (AR). It highlights their transformative impact on consumer engagement, operational efficiency, and competitive advantage. Furthermore, this study evaluates the integration of cloud computing into digital marketing, showcasing its role in enhancing data analytics, scalability, and personalization.

Keywords: *Digital Marketing; Cloud Computing; Artificial Intelligence (Ai)*

Introduction

Information technology (IT) has fundamentally shaped digital marketing by providing the tools and infrastructure necessary for businesses to connect with global audiences. The development of the internet, particularly the World Wide Web in the early 1990s, allowed businesses to reach customers across borders, enabling real-time interactions and engagement. IT also introduced capabilities for gathering and analysing vast amounts of data, from website visits to social media activity, which businesses use to understand customer behaviour and tailor marketing strategies. Tools like cookies, CRM systems, and analytics platforms like Google Analytics have made it possible to track performance, monitor conversion rates, and refine marketing campaigns based on actionable insights.

IT has also streamlined digital marketing through automation, allowing businesses to efficiently handle tasks such as email marketing, customer segmentation, and lead nurturing. Marketing automation tools like Hub Spot and Marke to leverage IT to deliver personalized content, targeting customers based on their behaviour and preferences. The rise of search engines and SEO also reflects Its impact, as search algorithms rank websites and content, helping businesses increased visibility and organic traffic. Additionally, the integration of IT with social media and mobile technology has made platforms like Facebook, Instagram, and LinkedIn essential tools for businesses to engage with consumers. IT powers targeted advertising on social platforms, enabling firms to deliver personalized ads based on demographics and user behaviour.

Characteristics of Digital Marketing

Global Reach: It allows businesses to connect with audiences across the world without geographical limitations.

Targeted Advertising: Digital marketing enables marketers to reach specific customer segments based on demographics, interests, and behaviour.

Cost-Effectiveness: Compared to traditional media like TV or print, digital marketing offers cost-efficient solutions for businesses of all sizes.

Real-Time Engagement: Digital platforms allow instant communication between businesses and customers, fostering stronger relationships.

Measurable Results: Advanced analytics tools help track the performance of marketing campaigns, providing insights into what works and what doesn't.

Digital marketing is not only about selling products but also about building brand awareness, educating audiences, and creating lasting relationships with customers. Its versatility makes it applicable to a variety of industries, from retail and healthcare to education and entertainment.

Advantages of Digital Marketing

Personalization: Digital marketing enables highly customized campaigns tailored to individual customer preferences and behaviours.

How to Cite this Article:
Anandi, P. (2026). A Comprehensive Review of Digital Marketing Strategies. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 227–229. https://doi.org/10.5281/zenodo.22160403

Scalability: Businesses can scale campaigns easily, from local to global, depending on their objectives and resources.

Improved Conversion Rates: Direct interactions through digital channels, such as email or social media, often lead to higher conversion rates.

Enhanced Customer Insights: Data analytics tools provide businesses with deep insights into customer preferences, behaviour, and purchasing patterns.

24/7 Availability: Unlike traditional stores, digital marketing operates round the clock, offering customers the flexibility to interact anytime.

Challenges in Digital Marketing

High Competition: With the rise of digital marketing, competition has intensified, making it challenging to capture audience attention.

Trends in Digital Marketing

Artificial Intelligence (AI): AI is being used for personalized marketing, chatbots, and predictive analytics to enhance customer experiences.

Voice Search Optimization: With the rise of virtual assistants like Alexa and Siri, optimizing content for voice search is becoming essential.

Video Marketing: Video content, especially live and short-form videos, is dominating digital platforms due to its high engagement rates.

Augmented Reality (AR) and Virtual Reality (VR): These technologies are being integrated into marketing strategies to offer immersive experiences.

Sustainability Marketing: Consumers are increasingly drawn to brands that promote sustainability and ethical practices.

Omni-channel Marketing: Integrating multiple digital platforms to provide a seamless customer experience across devices and channels.

Basic Theories of Digital Marketing

Diffusion of Innovation Theory

Proposed by Everett Rogers, this theory explains how innovations are adopted over time within a society. It categorizes adopters into innovators, early adopters, early majority, late majority, and laggards. In the context of digital marketing, businesses can use this theory to understand the adoption patterns of digital tools and tailor their strategies accordingly. For example, innovators and early adopters are likely to experiment with new technologies like AI-driven chatbots or augmented reality, while the late majority and laggards might prefer more traditional digital approaches like email marketing. This theory helps marketers plan campaigns targeting specific audience segments based on their readiness to embrace digital innovation.

AIDA Model (Attention, Interest, Desire, Action)

The AIDA model, proposed by E. St. Elmo Lewis, outlines the four stages a customer goes through during the purchasing process. It starts with grabbing the customer's Attention through engaging advertisements or content, followed by generating Interest with relevant and valuable information. The next stage, Desire, focuses on making the customer feel a need for the product or service. Finally, Action drives the customer to complete the purchase. This model is crucial in digital marketing as it guides the creation of strategies such as designing compelling landing pages, personalized email campaigns, or targeted ads to move customers smoothly through the buying funnel.

The Theory of Planned Behaviour (TPB)

Developed by Icek Ajzen, the Theory of Planned Behaviour examines how attitudes, subjective norms, and perceived behavioural control influence individual decisions. In digital marketing, this theory highlights how consumer attitudes towards a product, societal

Significance Of the Study

Digital marketing is a dynamic and indispensable component of modern business strategies. Its ability to adapt to changing consumer behaviours, utilize emerging technologies, and provide measurable outcomes makes it a powerful tool for organizations. However, success in digital marketing requires a deep understanding of customer needs, continuous innovation, and a commitment to ethical practices. As businesses and customers become increasingly digital-savvy, the importance of digital marketing will only continue to understanding the impact of digital marketing is essential. While some firms are successfully adopting digital platforms to improve visibility and performance, others face challenges such as limited resources, lack of digital skills, and difficulty adapting to evolving customer expectations. Similarly, customers have varied responses to digital marketing, with some embracing online campaigns and advertisements enthusiastically, while others remain skeptical.

Objectives of the Study:

To examine the level of awareness and usage of digital marketing among customers and firms.

2. To analyse the influence of digital marketing on customers' purchasing behaviour, brand perception, and overall satisfaction.

3. To evaluate the effectiveness of digital marketing.

Suggestions Related to the Impact of Digital Marketing on Customers

1. It is suggested that digital marketing content should be made more personalized to align with individual customer interests and preferences.

2. It is suggested that digital marketing messages should be made clearer and more informative to help customers make confident purchasing decisions.

Conclusion

The study‖ provides a comprehensive view of how digital marketing is transforming business dynamics and consumer behaviour in a rapidly evolving marketplace. With the rise of smartphones, internet penetration, and social media engagement, both customers and firms in are increasingly influenced by digital platforms in their decision-making and operational strategies.

From the customers' perspective, the study reveals that digital marketing plays a significant role in raising product awareness, influencing purchase decisions, and enhancing overall shopping experiences. Social media ads, email campaigns, and search engine content emerged as primary drivers of customer engagement. However, challenges such as privacy concerns, overwhelming advertisement exposure, and skepticism regarding the authenticity of

digital content still persist. Many customers value personalization, relevant content, and high-quality visuals, indicating that consumer.

Acknowledgment
I would like to express my sincere gratitude to all those who supported and encouraged me in completing this research paper entitled "A Comprehensive Review of Digital Marketing Strategies." I am deeply thankful to my institution, Marudhar Kesari Jain College for Women (Autonomous), Vaniyambadi, for providing the academic environment and necessary facilities to undertake this study.

Financial support and sponsorship
Nil.

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

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Manuscript ID:
TIJCMBLIR-2026-030445

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22160498

DOI Link:
ttps://doi.org/10.5281/zenodo.22160498

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The Three Dimensions of Professional Excellence & Digital Divide

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Abstract
Professional ethics, communication skills and competency development have become essential components of professional excellence in the contemporary globalized world. The rapid expansion of globalization, digital technology, artificial intelligence, multicultural workplaces and international business has transformed the nature of professional relationships and organizational practices. In such an environment, technical knowledge alone is not sufficient for professional success. Individuals are expected to demonstrate ethical conduct, effective This paper examines the integration of professional ethics, communication skills and competency development and argues that their combination can contribute not only to individual professional success but also to organizational effectiveness and sustainable global development. The paper further discusses contemporary workplace challenges and illustrates how ethical communication and competency development can support inclusive, responsible and sustainable professional practices.

Keywords: *Professional Ethics, Communication Skills, Competency Development, Global Development, Artificial Intelligence, Sustainable Development.*

Introduction

The twenty-first century has witnessed remarkable changes in the nature of professional life. Globalization, technological advancement, digitalization and international competition have transformed organizations from relatively local institutions into interconnected systems operating across national and cultural boundaries. Employees today may work with colleagues located in different countries, communicate with customers through digital platforms, participate in virtual meetings and use artificial intelligence-based tools for research, recruitment, marketing, education and decision-making. In such an environment, professional success cannot depend exclusively on technical knowledge. A professionally competent individual must also possess ethical awareness, effective communication skills, emotional maturity, cultural sensitivity, adaptability and leadership capabilities. Professional ethics provides the moral foundation for conduct, communication provides the mechanism through which individuals interact, and competencies provide the abilities required to perform successfully. Professional ethics can be understood as the principles that govern the behavior of individuals and organizations in professional environments. It involves honesty, integrity, accountability, fairness, respect, transparency, confidentiality and responsibility. Ethics helps professionals distinguish between what is merely possible and what is morally appropriate. This distinction has become increasingly important because technological development often enables organizations to perform actions that may not always be ethically desirable. Communication, on the other hand, is the process through which individuals exchange thoughts, ideas, information, opinions, attitudes and emotions. Effective communication is essential for creating understanding and developing healthy professional relationships.
It becomes particularly significant in multinational and multicultural organizations where differences in language, culture, values, communication styles and expectations can create misunderstandings. Competencies refer to the combination of knowledge, skills, abilities, attitudes and behavioral characteristics that enable a person to perform effectively. Competency development is a continuous process because professional requirements change with technological advancement and global economic conditions. The relationship among these

three dimensions can therefore be represented as:

- Professional Ethics → Ethical Foundation
- Communication Skills → Effective Interaction
- Competency Development → Professional Capability
- Global Development → Sustainable and Inclusive Progress

How to Cite this Article:
Dhoot, R. (2026). The Three Dimensions of Professional Excellence & Digital Divide. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 230–233. https://doi.org/10.5281/zenodo.22160498

When these elements work together, individuals and organizations become better equipped to respond to the challenges of contemporary professional life. Therefore, professional ethics, communication and competency development should not be viewed as isolated concepts. They are interconnected elements of professional and global development.

Professional Ethics

Professional ethics refers to the moral principles and standards that guide individuals in performing their professional responsibilities. Every profession has certain expectations regarding appropriate behavior. Doctors, teachers, engineers, lawyers, administrators, managers, researchers, journalists and business professionals are all expected to maintain certain ethical standards. Professional ethics provides a framework for responsible decision-making. The fundamental principles of professional ethics include honesty, integrity, accountability, fairness, respect, transparency, confidentiality and responsibility. Globalization has created workplaces where individuals from different countries and cultures work together. This diversity can increase creativity and innovation, but it can also create communication difficulties and ethical challenges. For example, direct communication may be considered professional and efficient in one culture, whereas another culture may prefer indirect and more relationship-oriented communication. Similarly, attitudes toward hierarchy, punctuality, disagreement and leadership may vary across cultures. Therefore, global professionals require cross-cultural competence.

A manager working with an international team should understand that disagreement does not necessarily indicate disrespect. Similarly, silence in a meeting may have different meanings depending on cultural background. Effective global communication requires patience, active listening and sensitivity. Professional ethics can provide a common foundation despite cultural differences. Principles such as honesty, respect, fairness, responsibility and dignity can help establish professional standards across geographical boundaries. Globalization has therefore increased the importance of ethical communication rather than reducing it.

Cultural Differences

Cultural diversity can create misunderstandings. A gesture considered respectful in one culture may be interpreted differently in another. Organizations should encourage cross-cultural training and inclusive communication.

Artificial Intelligence and Ethical Decision-Making

Artificial intelligence has become an important part of modern professional life. AI can assist with recruitment, customer service, education, medical research, content creation and business analysis. However, AI also raises questions concerning bias, privacy, transparency, accountability and human oversight. UNESCO's Recommendation on the Ethics of Artificial Intelligence recognizes both the opportunities of AI and its ethical risks, emphasizing human rights and human dignity. For example, an organization may use AI to screen job applications. If the training data contains historical biases, the system could reproduce those biases. Therefore, professional competency now includes the ability to understand not only how to use AI but also when and how to use it responsibly.

Data Privacy

Digital workplaces collect large amounts of employee and customer information. Ethical professionals must understand that information should not be accessed, shared or manipulated without appropriate authorization. A competent employee therefore needs both digital literacy and ethical awareness.

Remote and Hybrid Work

Remote work has changed workplace communication. Employees may communicate through email, video conferences, messaging applications and collaborative platforms rather than face-to-face interaction. This creates new ethical responsibilities. Employees must respect working hours, maintain confidentiality, communicate clearly and avoid unnecessary digital pressure. A manager who sends repeated messages late at night may unintentionally create stress for employees. Ethical communication therefore requires consideration of employees' boundaries and well-being.

Communication Skills in Professional Life

Communication is one of the most important competencies required in professional life. A technically skilled employee may possess excellent knowledge but may still struggle to succeed if ideas cannot be communicated effectively. Professional communication includes: Verbal communication, non-verbal communication, written communication, Listening, Speaking, Reading, Presentation skills, Digital communication, Cross-cultural communication, Negotiation, Persuasion, Feedback etc. As we know that communication is not merely the transmission of information. It is the creation of shared understanding.

Non-Verbal and Digital Communication

Communication is not restricted to words. Body language, facial expressions, eye contact, posture, gestures and tone can influence how a message is interpreted. For example, during an interview, a candidate's confidence may be communicated not only through answers but also through posture, eye contact and voice. Digital communication creates a different challenge because many non-verbal cues disappear. A short message such as “Okay” may be interpreted as agreement, anger or indifference depending on the context. Therefore, digital professionals should learn to communicate clearly through email, messaging applications, video conferences and collaborative platforms.

Communication as a Core Professional Competency

Competency development refers to the continuous process of acquiring and improving knowledge, skills, abilities and professional behaviors. A competent professional does not merely know what to do but also understands how, when and why to perform a task. Organizational competencies reflect the mission, vision, values, culture and strategic capabilities of an

organization. Employees need to understand how their individual responsibilities contribute to organizational goals. Core competencies are distinctive capabilities that provide an organization with an advantage over competitors. Innovation, customer service, technological expertise, quality management and organizational culture can become core competencies. Among different competencies, communication occupies a central position because it supports the development of many other abilities. For example, leadership cannot be effectively demonstrated without communication. Teamwork requires communication. Negotiation requires communication. Conflict management requires communication. Customer service requires communication. Therefore, a professional who can communicate effectively is more capable of sharing knowledge, receiving feedback and learning from others. Communication also facilitates competency development through mentoring, training and feedback. For example, a senior employee may have excellent technical knowledge. However, if that employee cannot communicate the knowledge to junior colleagues, the organization's ability to develop future talent is reduced. The absence of any one of these areas can affect the overall effectiveness of the manager.

Artificial Intelligence and Professional Competence

Artificial intelligence provides an important example of why ethics, communication and competencies must develop together. A professional may use AI to prepare reports, analyze data, generate ideas or improve productivity. However, the professional remains responsible for checking the accuracy and appropriateness of the output. For example, a student or employee using generative AI to prepare a report should verify facts, protect confidential information and avoid presenting AI-generated material as original work when disclosure is required. Similarly, a company using AI for recruitment should consider fairness and transparency rather than assuming that automated decision-making is automatically objective. Thus, the future professional is not simply an "AI user" but an ethical and responsible technology user.

Global Development

Professional development is closely connected with global development. Global development requires human development. Economic growth without ethical responsibility may increase productivity while simultaneously creating inequality, exploitation or environmental damage. Professional ethics therefore contributes to the quality of development, while communication and competencies contribute to the capacity to achieve it.

Strategies for Developing Ethical and Global Competencies

The following strategies can strengthen professional development:

- Promote Ethical Awareness:
- Strengthen LSRW Skills
- Encourage Continuous Learning
- Develop Digital Competence
- Professionals should learn to use emerging technologies responsibly.
- Promote Cross-Cultural Training
- International organizations should provide employees with cultural awareness and global communication training.
- Encourage Ethical Use of AI
- Constructive feedback helps professionals identify weaknesses and improve performance.
- Connect Professional Development with Sustainable Development

Organizations should encourage competencies that support economic, social and environmental sustainability.

Conclusion

Professional ethics, communication and competency development are three interconnected dimensions of professional excellence. Ethics provides the moral foundation that guides professional behavior; communication creates understanding and relationships; and competencies provide the knowledge, skills and abilities required to perform effectively. In the globalized workplace, these elements have become more important than ever. Professionals work across geographical, linguistic, cultural and technological boundaries. Consequently, they need to communicate effectively with diverse audiences, understand ethical responsibilities, develop technical and behavioral competencies and adapt continuously to changing professional environments. The emergence of artificial intelligence, digital labour platforms, remote work and data-driven organizations has further expanded the meaning of professional ethics. Ethical responsibility is no longer restricted to face-to-face interactions or traditional organizational structures. It now includes responsible technology use, data protection, algorithmic fairness, digital communication, employee well-being and accountability. Global development also depends upon the quality of professional life. Sustainable economic growth cannot be achieved merely through technological advancement or increased productivity. It requires decent work, inclusion, equal opportunity, ethical leadership, skills development and respect for human dignity. The United Nations' Sustainable Development Goal 8 directly connects economic development with productive employment and decent work, reinforcing the importance of developing capable and responsible professionals.

Therefore, professional competency should be understood as a combination of knowledge, skills, ethical values, communication ability, cultural awareness, digital literacy and responsible behavior. The future of professional development lies not simply in producing employees who can perform tasks but in developing individuals who can think ethically, communicate effectively, work collaboratively, use technology responsibly and contribute positively to society. Professional ethics tells us what is right. Communication enables us to share and understand it. Competencies enable us to put it into practice. When all three are integrated, they can contribute to professional success, organizational effectiveness and sustainable global development. As development is

ultimately about improving human capabilities and creating opportunities for meaningful participation, professional education and workplace development should aim at the holistic growth of individuals. The successful professional of the future will therefore not be defined only by qualifications, designations or technical expertise but by the ability to combine competence with character, communication with responsibility, and professional success with social and global development. In this sense, professional ethics, communication and competency development are not separate requirements of modern professional life; they are mutually reinforcing foundations for building trustworthy professionals, responsible organizations and a more inclusive and sustainable global society.

Acknowledgement
The author sincerely expresses gratitude to all those who contributed directly or indirectly to the completion of this research paper on "The Three Dimensions of Professional Excellence & Digital Divide." The study highlights the importance of professional ethics, communication skills, competency development, responsible use of artificial intelligence, digital competence, and sustainable global development.

Financial support and sponsorship
Nil.

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

Manuscript ID:
TIJCMBLIR-2026-030446

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22160571

DOI Link
https://doi.org/10.5281/zenodo.22160571

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Effectiveness Of Mutual Fund Investments Among Retail Investors

Uday B. Kittekar
Latur.

Abstract
Mutual Funds have emerged as one of the most sought-after modes of investments among retail investors owing to their features of offering diversification, professional management, liquidity and accessibility. Over the past few decades, there has been unprecedented growth in the mutual fund industry globally as well as in the developing nations such as India. The rising involvement of retail investors in the mutual funds is an outcome of rising financial awareness as well as the need for efficient means of wealth creation. There are various means for the retail investors who have limited money as well as limited understanding of the market in participating in the capital market through mutual funds. This paper focuses on analyzing the efficiency of mutual funds as an investment option among retail investors through analyzing their performance, strengths, weaknesses, investor perception and use in financial planning. The research is based on secondary data which has been sourced from the academic literature, industry reports as well as financial publications. It has been found that mutual funds effectively facilitate long term wealth creation, diversification and risk management. However, investor education, financial literacy and market knowledge is very essential in making a successful investment through mutual funds.

Keywords: *Mutual Funds, Retail Investors, Investment Performance, Wealth Creation, Portfolio Diversification, Financial Planning, Risk Management.*

Introduction

In the process of gaining financial stability and creating wealth, making investment decisions is essential. Being in a more dynamic and unpredictable economic environment, people look for ways to invest their money and gain the highest possible returns with the lowest possible risk involved. People used to invest their savings in savings accounts, fixed deposits, gold, and real estate. Nevertheless, nowadays with the development of financial markets, more and more possibilities of investing have opened up to individual investors. One of the ways to invest money efficiently is to use mutual funds. As the name implies, mutual funds involve pooling the financial resources of many investors into diversified portfolios consisting of stocks, bonds, government securities, and money market instruments. Professional fund managers make all the decisions on how to invest pooled money. Mutual funds became very popular due to the development of technologies, digitalization of investment industry, introduction of regulations, and increasing knowledge about financial planning. In India, the campaigns of raising the awareness of investors and the introduction of Systematic Investment Plan (SIP) made a lot of people interested in mutual funds' investments. Mutual funds are very useful to retail investors because of diversification, professional management and low investments needed. The result is that the study of the success of mutual funds' investments among retail investors is now a field of interest both academically and practically.

Concept of Mutual Funds

A mutual fund is an investment vehicle that pools money from various investors and invests the same in a wide range of financial instruments. The individual investors own units that are a proportional representation of the holdings in the mutual fund. The valuation of the units of the mutual fund is based on Net Asset Value (NAV) that gives the value of the assets held in the fund after subtracting liabilities. The mutual funds work on the concept of pooled investment.

Characteristics of Mutual Funds

- Professional fund management
- Diversification of investments
- Liquidity
- Transparency
- Regulatory oversight
- Affordability
- Flexibility

How to Cite this Article:
Kittekar, U. B. (2026). Effectiveness Of Mutual Fund Investments Among Retail Investors. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 234–236. https://doi.org/10.5281/zenodo.22160571

These features make mutual funds particularly attractive to retail investors.

Types of Mutual Funds Available to Retail Investors

Equity Mutual Funds: These funds primarily invest in equity shares and aim to generate capital appreciation. They are suitable for investors with long-term investment horizons and higher risk tolerance.

Debt Mutual Funds: Debt funds invest in fixed-income securities such as government bonds and corporate debt instruments. They offer relatively stable returns with lower risk.

Hybrid Funds: Hybrid funds combine equity and debt investments to achieve a balance between risk and return.

Index Funds: Index funds passively track a benchmark market index and generally involve lower management expenses.

Exchange-Traded Funds (ETFs): ETFs combine the benefits of mutual funds and stock trading by allowing investors to buy and sell units on stock exchanges.

Sectoral and Thematic Funds: These funds focus on specific industries or investment themes. While they may offer high returns, they also involve greater risk due to concentrated exposure.

Effectiveness of Mutual Funds among Retail Investors

Portfolio Diversification: One of the best features of the mutual funds is diversification. It helps in reducing the unsystematic risk by investing the money in various securities. Investors do not have enough money to diversify their portfolio themselves. But the advantage of mutual fund lies in the fact that it brings together the money of many people. Diversification helps in reducing the effect of bad performance of individual securities.

Professional Management: Mutual funds have professionals like fund managers who are experienced in managing funds along with analysts and researchers. Professionals make the process of selecting securities and managing portfolios effective. The skills of the professionals will be beneficial for retail investors.

Accessibility: Democratization of investments is the feature of the mutual fund schemes. One can start making investments from smaller amounts via SIPs. The ease and accessibility of the mutual funds have led to their democratization.

Liquidity: Most of the open-ended mutual funds have liquidity in that they allow their clients to redeem the units at the current net asset values. This is especially true for the retail clients who might need money in case of an emergency.

Risk Management: Fund managers employ sophisticated risk management techniques including diversification, sector allocation, and portfolio rebalancing. This professional approach reduces investment risks and enhances investor confidence.

Long-Term Wealth Creation: History has shown us that mutual funds with an equity focus provide high returns. Compounding along with investing in SIPs plays a major role in wealth creation. Regular investments every month for 15 to 20 years will create wealth due to the power of compounding.

Factors Influencing Mutual Fund Investment Decisions

Financial Literacy: Financial literacy significantly influences investment decisions. Investors with greater financial knowledge are more likely to understand investment risks and evaluate fund performance effectively.

Income Level: Higher income generally increases investment capacity and encourages participation in mutual fund schemes.

Risk Tolerance: Individual attitudes toward risk play a critical role in selecting investment products. Risk-averse investors often prefer debt funds, while aggressive investors may choose equity-oriented schemes.

Investment Objectives: Investment goals such as retirement planning, children's education, home purchase, and wealth creation influence mutual fund selection.

Market Conditions: Economic growth, inflation, interest rates, and stock market performance affect investor sentiment and mutual fund returns.

Technological Developments: Digital platforms and mobile applications have simplified investment procedures and enhanced investor access to mutual fund products.

Benefits of Mutual Fund Investments

1. Diversification: Mutual funds spread investments across various securities, reducing concentration risk.

2. Professional Expertise: Experienced fund managers conduct research and make informed investment decisions.

3. Convenience: Investors can easily invest, monitor, and redeem mutual fund units through online platforms.

4. Transparency: Mutual funds regularly disclose portfolio holdings, NAVs, and performance reports.

5. Tax Efficiency: Certain mutual fund schemes provide tax benefits under applicable tax regulations.

6. Systematic Investment: SIPs promote disciplined investing and reduce the impact of market volatility through rupee cost averaging.

Affordability: Mutual funds enable participation in financial markets with relatively small investments.

Challenges and Limitations

1. Market Risk: Mutual funds are subject to market fluctuations and economic uncertainties.

2. Inadequate Financial Literacy: Many retail investors lack sufficient understanding of investment products and associated risks.

3. Behavioral Biases: Investment decisions are often influenced by emotions such as fear, greed, and herd behavior. These biases may lead to poor investment decisions.

4. Expense Ratios: Management fees and operational expenses can reduce net returns.

5. Performance Uncertainty: Past performance does not guarantee future results, making fund selection challenging.

6. Information Overload: The large number of available schemes may confuse investors and complicate decision-making.

Mutual Funds and Financial Planning

Mutual funds have become an essential component of personal financial planning.

1. Retirement Planning: Long-term mutual fund investments help individuals accumulate retirement wealth.

2. Education Planning: Parents increasingly utilize mutual funds to finance future educational expenses.

3. Emergency Funds: Liquid and ultra-short-term funds provide readily accessible funds during emergencies.

4. Goal-Based Investing: Mutual funds facilitate systematic investment aligned with specific financial objectives.

5. Wealth Preservation and Growth: Balanced investment strategies help investors preserve capital while pursuing long-term growth.

Emerging Trends in Mutual Fund Investing

1. Digital Investment Platforms: Mobile applications and online platforms have transformed investor access and convenience.

2. Artificial Intelligence and Data Analytics: Advanced technologies assist in portfolio management, risk assessment, and personalized investment recommendations.

3. Sustainable Investing: Environmental, Social, and Governance (ESG) funds are attracting increasing investor interest.

4. Robo-Advisory Services: Automated investment advisory services provide low-cost portfolio recommendations based on investor profiles.

5. Increasing SIP Participation: Systematic Investment Plans continue to attract retail investors seeking disciplined and long-term investment solutions.

Conclusion

Mutual funds have emerged as one of the most effective investment vehicles for retail investors in the contemporary financial markets. They help achieve diversification, professional management, liquidity, affordability, and transparency, which make them ideal for investors who lack adequate knowledge of how to invest.

The efficacy of mutual funds is derived from the ability of mutual funds to create wealth, minimize investment risks by diversifying them, and helping investors practice financial discipline. Mutual funds enable retail investors to meet their financial goals such as savings for retirement, college tuition costs, and wealth accumulation through systematic investment planning and professional management of portfolio.

Although issues such as market instability, inadequate financial education of investors, and behavioral problems affect the performance of mutual funds, mutual funds still have a great deal of strengths compared to other forms of traditional investments. The emergence of digitalization, artificial intelligence, and investment education programs is bound to improve the efficacy of mutual funds in the future.

For these reasons, mutual funds are among the most effective investment vehicles for retail investors in the contemporary world.

Acknowledgement

The author expresses sincere gratitude to all those who provided valuable support and encouragement during the completion of this research paper on "Effectiveness of Mutual Fund Investments among Retail Investors." The study focuses on mutual funds, their effectiveness, diversification, professional management, risk management, and their role in long-term wealth creation for retail investors.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030447

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22160598

DOI Link:
https://doi.org/10.5281/zenodo.22160598

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Marriage, Patriarchy and Female Agency: A Comparative Study of Anita Desai and Namita Gokhale

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Abstract
This research paper presents a comparative study of marriage, patriarchy, and female agency through selected works by Anita Desai and Namita Gokhale. By examining the evolution of the Indian English novel, this investigation explores how marital institutions function as primary engines of patriarchal regulation. Desai's fiction maps the internal landscape, demonstrating how domestic confinement fosters profound psychological entrapment, emotional suffocation, and inward-facing resistance. Gokhale's narratives utilize sharp wit, open subversion, and bold expressions of desire to dismantle orthodox gender roles and externalize female defiance. Utilizing feminist literary theory, psychoanalytical criticism, and sociological perspectives, the study evaluates contrasting trajectories of autonomy. The analysis reveals that while Desai's characters seek liberation through quiet endurance, mental withdrawal, or tragic defeat, Gokhale's heroines assert themselves through active rebellion and social confrontation. Despite distinct stylistic and generational approaches, the findings indicate that both authors converge on a central argument: reclaiming female agency is fundamentally non-negotiable for psychological survival. Ultimately, this comparative evaluation highlights how diverse literary strategies contribute to modern feminist discourse in Indian literature.

Keywords; *Patriarchy, Female Agency, Marriage, Indian English Literature, Anita Desai, Namita Gokhale, Gender Roles.*

Introduction

The Indian English novel has undergone a profound transformation concerning women and marriage. Early literature frequently depicted female characters as passive figures defined entirely by their domestic roles and familial ties. Over decades, narrative traditions shifted, allowing authors to scrutinize marital structures and grant female figures complex identities. This literary evolution mirrors broader societal changes, moving from silent endurance toward assertive independence. Anita Desai and Namita Gokhale represent two vital currents in this tradition, each bringing distinct stylistic and thematic tools to the exploration of womanhood. Desai pioneered psychological realism within Indian fiction, turning inward to examine the emotional isolation, mental suffocation, and existential despair experienced by wives trapped in traditional homes. Her narratives prioritize the silent battles fought within the human mind. Conversely, Gokhale employs sharp irony, historical and mythic reclamation, and bold societal critique. Her works dismantle orthodox norms through wit, candid portrayals of sexuality, and direct challenges to patriarchal authority. Despite numerous critical studies on both writers individually, a significant research gap remains regarding a comparative framework that bridges their generational and stylistic differences. Previous scholarship rarely places Desai's quiet, inward-looking trauma alongside Gokhale's externalized, subversive satire to evaluate how both approaches alter the expression of female agency inside marriage. Understanding how these distinct literary techniques address similar systemic pressures offers a fuller picture of modern feminist discourse. To address this gap, this study argues that while Desai highlights the psychological suffocation of traditional marriage, Gokhale subverts patriarchal expectations through bold expressions of sexuality and selfhood, yet both ultimately converge on the redefining of female agency.

How to Cite this Article:
Patange, D. C., & Mudkanna, A. (2026). Marriage, Patriarchy and Female Agency: A Comparative Study of Anita Desai and Namita Gokhale. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 237–240. https://doi.org/10.5281/zenodo.22160598

Objectives of the study

- To examine the representation of marriage as a patriarchal instrument in selected novels of Anita Desai and Namita Gokhale.
- To analyze the psychological and social pressures faced by female protagonists within marital bounds.
- To compare the manifestations of female agency—ranging from internal rebellion to outward subversion.
- To evaluate how socio-cultural shifts are reflected in the contrasting narrative techniques of both authors.

Literature Review

Scholarship concerning Indian English women's writing has long engaged with how literature mirrors, challenges, and resists patriarchal structures. Early academic discussions established that post-colonial narratives often used domestic settings to study national and cultural identity. Prominent critics like Jasbir Jain and Meenakshi Mukherjee mapped the trajectory of female authorship, noting how pioneering academics and literary historians began dismantling the myth of the contented, self-sacrificing Indian homemaker. Their foundational works argue that literature acts as a primary vehicle for exposing the systemic confinement embedded in family codes. Academic evaluation of Anita Desai centers heavily on her mastery of psychological depth, alienation, and domestic discord. Researchers such as Jasbir Jain and various post-colonial literary critics have extensively analyzed how Desai portrays women trapped in loveless or stifling households. Scholars emphasize that her protagonists—such as Maya in *Cry, the Peacock* or Monisha in *Voices in the City*—suffer from profound inner turmoil. Rather than engaging in physical revolt, Desai's heroines experience existential angst, nervous breakdowns, and quiet withdrawal. Analysts frequently highlight that Desai exposes marriage not as a sacred union, but as a cage that suffocates female autonomy and intellectual freedom.

Conversely, scholarship surrounding Namita Gokhale focuses on her fearless subversion of traditional archetypes, her frank treatment of female desire, and her critical engagement with historical patriarchy. Critics writing on Gokhale often reference works like *Paro: Dreams of Passion* or her historical fiction to demonstrate how she breaks away from puritanical boundaries. Academic reviews note that Gokhale utilizes satire, wit, and unabashed sexuality to mock male vanity and social hypocrisy. Her characters do not suffer in silence; instead, they actively disrupt orthodox expectations, reclaiming agency through vocal expression and bodily freedom. Despite the wealth of separate commentary dedicated to both authors, a clear analytical gap persists within contemporary literary criticism. While numerous essays examine Desai's interiority or Gokhale's externalized rebellion in isolation, few attempts have been made to construct a comparative framework linking marriage, patriarchy, and agency across their oeuvres. Existing studies rarely bridge the generational and stylistic gulf separating Desai's melancholic psychological realism from Gokhale's vibrant, ironic subversion. Bridging this divide is essential for understanding the broader evolution of feminist thought in Indian fiction. By placing these contrasting literary voices in direct dialogue, this research examines how two different generations of writers utilized alternative artistic methods to arrive at a shared destination: the urgent necessity of redefining female agency.

Methodology

This investigation adopts a comparative literary approach paired with qualitative textual interpretation. This method enables a structured examination of how two distinct authors portray marital dynamics, power structures, and autonomy. By placing select narratives side by side, the study highlights parallel motifs as well as stylistic divergences. Three primary critical lenses guide the analytical process. First, feminist literary theory supplies the foundation for evaluating gender inequality, power imbalances, and liberation strategies. Second, psychoanalytical criticism helps decode the deep-seated mental struggles, emotional isolation, and inner turbulence experienced by characters. Third, sociological perspectives on marriage and patriarchy provide context regarding how traditional institutions shape domestic expectations and restrict personal freedom within South Asian societies. The primary corpus consists of selected novels by Anita Desai and Namita Gokhale. Desai's focus on psychological depth and domestic entrapment anchors the first half of the examination, while Gokhale's satirical, bold approach to desire and social defiance shapes the second. Close reading of these texts uncovers how both creators construct female identity. To support these textual evaluations, secondary sources are utilized extensively. These materials encompass peer-reviewed journal articles, critical essay collections, cultural studies publications, and author interviews. Analyzing these external commentaries ensures that the conclusions align with established academic standards while offering a fresh perspective on the evolution of female agency.

Analysis

Anita Desai constructs domestic environments not as havens of safety, but as architectural cages that foster profound psychological entrapment. In her narratives, household walls mirror the closed mental states of female protagonists who feel entirely disconnected from their spouses. Marriage functions as an institutionalized barrier that restricts intellectual and emotional growth. Husbands often embody rigid societal expectations, rendering them oblivious to the profound emotional needs of their partners. Consequently, the home transforms into a theater of quiet despair where happiness remains permanently out of reach. Within this oppressive framework, silence and complicity become dominant features of marital interaction. Communication between spouses frequently breaks down, replaced by heavy quietness or polite indifference. Women often internalize their suffering, blaming themselves for failing to meet traditional standards of docility and service. This

forced compliance maintains the status quo, allowing patriarchal dynamics to persist unchallenged on the surface while quietly eroding the mental well-being of the wife. Because outward revolt is discouraged by societal pressures, Desai's characters resort to internalized rebellion. Acts of defiance are rarely public or revolutionary; instead, they manifest as nervous breakdowns, obsessive thoughts, hallucinations, or tragic withdrawals from reality. This inward-turning resistance highlights the strict limits placed on female agency. While these emotional reactions signal a fierce rejection of domestic suppression, they ultimately lead to tragic isolation rather than genuine liberation, underscoring the heavy toll exacted by patriarchal marital bonds.

Namita Gokhale adopts an entirely contrasting narrative strategy by aggressively dismantling the traditional archetype of the chaste, self-sacrificing Indian wife. Her protagonists refuse to accept moral policing or submissive domestic roles. Instead, they embrace their individuality with wit, irony, and unapologetic confidence. By mocking hypocritical social customs, Gokhale exposes the fragility of male ego and the absurdity of orthodox rules governing female behavior. Female desire and vocal autonomy occupy central roles in Gokhale's fiction. Rather than hiding physical or emotional yearnings, her characters express them openly as tools of social defiance. Sexuality is reclaimed not as a tool for male gratification, but as an expression of personal sovereignty. Through sharp dialogue and rebellious actions, these women talk back to authority figures, disrupting the comfort of patriarchal structures and demanding to be heard on their own terms. Ultimately, Gokhale's works redefine autonomy by exploring choices made both within and outside traditional marital frameworks. Some characters challenge bad marriages through calculated defiance, while others step completely outside domestic boundaries to forge independent identities. By presenting diverse paths to self-actualization, Gokhale demonstrates that true freedom requires dismantling traditional scripts, allowing women to construct meaningful lives guided by their own agency rather than societal mandates.

Discussion

Placing the fictional worlds of Anita Desai and Namita Gokhale side by side reveals a striking contrast in how female resistance manifests. Desai champions an internalized, melancholic approach. Her protagonists battle oppression quietly, carrying heavy psychological burdens behind closed doors. Their rebellions are deeply personal, often resulting in nervous distress, quiet withdrawal, or tragic defeat. Conversely, Gokhale brings a vibrant, unapologetic energy to the page. Her characters reject sorrow in favor of satire, vocal defiance, and bold self-assertion. Where Desai's heroines suffer in silence, Gokhale's figures talk back, mocking patriarchal authority and claiming space with fierce confidence. This comparative look also illuminates how patriarchal control adapts and shifts across different narratives. Male domination rarely relies solely on brute force or crude physical restriction in these stories. Instead, authority operates through subtle emotional manipulation, cultural conditioning, and deeply entrenched institutional customs. In Desai's novels, husbands and families maintain power by imposing rigid emotional expectations and cultivating an atmosphere of silent intimidation. In Gokhale's works, patriarchy polices behavior through social gossip, moral policing, and conventional shame. Despite these differing tactics, the core objective remains identical: keeping women compliant, quiet, and bound to traditional roles.

Evaluating the broader implications of female agency requires examining how characters attempt to find freedom. True emancipation rarely arrives as a simple gift granted by society; rather, it demands painful negotiation. Some heroines seek fulfillment by transforming bad domestic arrangements from within, attempting to carve out personal space inside hostile households. Others discover that genuine peace requires total escape, walking away from conventional unions to start afresh on independent terms. Ultimately, self-actualization proves to be the true metric of success. Whether a character achieves liberation through quiet mental resilience or loud, rebellious action, freedom depends entirely upon reclaiming ownership of one's identity. Bridging these two distinct literary visions demonstrates that female empowerment is not monolithic. Desai maps the agonizing inner cost of fighting an invisible cage, while Gokhale celebrates the liberating thrill of smashing open the door. Together, their writings chart a comprehensive map of modern womanhood, proving that resilience takes many forms—all equally vital for dismantling oppressive social structures.

Results

This comparative study yields three primary findings regarding gender dynamics in Indian English fiction. First, marriage consistently operates as a foundational engine for patriarchal regulation. Across both literary canons, domestic unions demand total compliance, converting homes into sites where traditional hierarchies suppress individuality. Second, the modalities chosen to express autonomy differ vastly between the two authors. Desai's heroines navigate oppression through heavy psychological endurance, emotional withdrawal, or tragic defeat. Conversely, Gokhale's figures utilize sharp wit, open subversion, and active confrontation to dismantle restrictive social expectations. Finally, despite distinct generational backgrounds and contrasting stylistic approaches, both creators demonstrate that female agency is fundamentally non-negotiable for mental health and psychological survival. Whether pursued through quiet introspection or loud defiance, reclaiming personal autonomy remains essential.

Conclusion

This comparative investigation explored the complex intersections of marriage, patriarchal control, and female autonomy through selected texts by Anita Desai and Namita Gokhale. By placing these distinct literary voices side by side, the study tracked how domestic institutions stifle personal freedom and how women

push back against such confinement. While Desai maps the quiet, agonizing interior battles of trapped wives, Gokhale champions outward rebellion, wit, and expressive desire. Together, their narratives reveal that while the tactics of resistance vary widely, the underlying struggle for selfhood remains constant. The contributions of both authors to feminist discourse within Indian English literature are profound. Desai broke new ground by prioritizing psychological realism, exposing the mental toll of loveless unions and forcing readers to acknowledge the invisible cages built inside domestic spaces. Gokhale advanced this conversation by dismantling traditional archetypes, introducing bold sexuality, and mocking hypocritical social norms with sharp irony. By expanding the boundaries of what female characters could feel, say, and do, both writers permanently enriched the nation's literary landscape and paved the way for modern gender critique. Looking ahead, numerous possibilities remain for expanding this line of inquiry. Future researchers could extend this framework into the twenty-first century, examining how contemporary Indian women writers portray evolving marital paradigms, digital-age relationships, and changing social expectations. Investigating newer texts will help determine how modern legal reforms, career independence, and shifting urban cultures continue to reshape the eternal quest for female agency.

Acknowledgment
The authors would like to express their sincere gratitude to all those who contributed to the successful completion of this research study. We are deeply thankful to our research guide, colleagues, and well-wishers for their valuable guidance, encouragement, and constructive suggestions throughout the study. We also acknowledge the contribution of scholars and researchers whose critical works on Anita Desai, Namita Gokhale, feminism, patriarchy, marriage, and female agency provided valuable academic support for this research. Finally, we extend our heartfelt appreciation to everyone who directly or indirectly supported the completion of this comparative study.

Financial support and sponsorship
Nil.

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

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Manuscript ID:
TIJCMBLIR-2026-030448

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22160697

DOI Link:
https://doi.org/10.5281/zenodo.22160697

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Right to Livelihood of Trible's Under Human Right Perspective

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Abstract

Humanity yearning for respect, tolerance and equality goes a long back in history, but the curious thing to note is that although our societies have in many respects made great strides in the technological, political, social and economic field. Even though much have spoken about human rights but it is very difficult to give crystal clear definition of human rights. Some philosophers have aptly remarked that, it may be difficult to define what the human rights are, but it is impossible to ignore them. The struggle of Human Right aims for the human happiness. A society can be nominated as civilized society only after the fulfilment of the rights of individual including tribal people. Human rights are the rights which are invariant to all human being irrespective of nationality, place of birth, colour, religion, language or any other status. Human rights are not a luxury to us but it is a basic need of very human being. Commonly alleged as rights of tribal over forest produce and forest land and forest rights have been a major area of concern as well as debate in India. Tribal peoples in our India having their own culture and customary practices need to be protect by the stated. Tribal have emotional, psychological and cultural attachment with the forest as they always lived in the forest. Forest in fact have influenced their collective imaginations, belief systems and culture, there by shaping their identity. Even today there is Co-existence of tribe's and the forest.

Key Words: *Human right, Tribal People, Forest, Culture, Globalization, Deforestation.*

Introduction

Human rights constitute a precious heritage for the mankind for which many battles have been fought & won. And the battle continues in order to safeguard various rights & freedom like right to personal liberty, right to livelihood, right against discrimination & freedom from exploitation and many more. All these rights & freedom enshrined in Universal declaration of Human rights, 1948.[1]This paper critically analysed the rights of tribal community such as right to livelihood, right to food, specially to recognize the first rights and occupation of forestland to the forest dwelling scheduled tribes and other traditional forest dweller. Human rights as a term most commonly used are the rights which every human being is entitled to enjoy and to have protected. Human rights are those rights without which human existence cannot be possible & permissible, all the rights of tribal people are in event inalienable, natural and moral and self-determination. Human rights of Tribal cannot be taken away by the state for the development project. Human rights of everyone is not only protected by our constitution, but also some documents of international level like universal Declaration of Human Rights – 1948 & the ILO convention No – 107 and recommendation – 104 in 1957 on the protection of indigenous and tribal population to which the India is member of it.[2] This ILO resolution emphasis upon the development of technical programmes and projects for solving the poverty and unemployment problem attending indigenous and tribal people & not for the displaced those people from their place of residence for globalization issues. This case is selected by me because of that; there is need to protect & support those tribal community & forest dwellers & protect their basic human rights this issue was recent origin from last three decade. When state adopted the policy of globalization & privatization; everything is change except the rule of change and the life of nation or a social political system is not an exception to it. The political, social and economic conditions change continuously. Due to this session we lose more than one million hectors of forest cover every year due to development projects. It is a time that we realize the importance of forest & value their worth. Despite of economic development, we do not able to survive & good quality of life if we do not have sufficient green cover around us

How to Cite this Article:
Deshmukh, A. R. (2026). Right to Livelihood of Trible's Under Human Right Perspective. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 241–244. https://doi.org/10.5281/zenodo.22160697

[1]Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (1948).
[2]ILO Convention No. 107 concerning the Protection and Integration of Indigenous and Other Tribal and Semi-Tribal Populations in Independent Countries (1957) and Recommendation No. 104 (1957).

In nutshell forest can help us in maintaining the ecological balance. Each providing shelter to wild animals, preserving the genepool of various trees and protecting the tribal population who are totally depends on forest & forest produce. Tribal peoples are unaware about their human rights due to lack of education, ignorance of law. State agencies are not reach to those tribal population because of far away from general society and in adequacy of policies for upliftment of them. Even though there is a protection of the basic rights of tribal community by passing the legislation in the year of 2006,[3] but it was not much benefited to these population. So, I will try to critically analysed this problem in the context of Human Rights & Social Transformation in Environmental Law.

Objectives of Analysis

1. To understand the rights of tribal people in the context of Human Rights.
2. Role of stakeholders in protection of Human Rights of Tribal's.
3. Critically understand the Role of the State in welfare era.
1. Role of the judiciary for enforcement of the Rights of Tribal's.

Methodology

The critical analysis of the case study through to various aspects of Human Rights and the rights of the Tribal's community enshrined under various provisions of Law. Fundamental rights and directive principles of state policy under part – III & part – IV of the constitution.[4] To analyse the role of the state to implementing the law relating to forest Right Act 2006 with considering the case laws decided by Apex Court of India.

Case Study Overview

The situational case study on Human Rights regarding Tribal Community. **Summary of the case as follows:**

A group of tribals lived for generations at village Dhani in North Maharashtra. The entire community was rich in natural resources like water, food, fuel etc. however one day they were informed of the government's decision to develop the land which was possessed by tribals by constructing the building for Multinational company.

The community was assured six compensation and alternate accommodation. Human Rights are to be exercise and enjoyed by all people. Without them, people including tribals cannot fully develop as human beings. Human rights are based on mankind's increasing demand for a life in which the inherent dignity and worth of a human being is respected and protect. But it is a duty of a state as welfare state to be respected & protected those human rights irrespective of any discrimination. State instrumentality does it through the laws and enforcement agency like judiciary. The realization of the right to development of every human being and the Nation is impossible without recognition of Human Rights and Fundamental Freedom. Denial of Human Rights and fundamental freedom has led to social and political unrest sowing the seeds of violence in conflict within and between societies and communities. Denial of Human Rights of tribal directly or indirectly affect the environment and economic development. In this case the major stakeholders are the tribal people and the state agencies. Tribal people as a human being recognize their rights as right to livelihood, right to development, right to freedom to hold and live in the forest, community rights such as nistar including right to protect, regenerate or conserve of all the forest villages and old habitation. On the other part state is under obligation to protect, preserve the rights of tribal community through the Act or statute and actual implementation of it. In case of violation of Human Rights of tribal, the judiciary played an important role as a protector & guarantor of citizen's Rights. In relation of the above situation some cases highlighted & decisions of supreme court as a guiding principle for protection of tribal rights. Fatesang Gimba Vasava v State of Gujarat (1987) It is a typical case that explains the impact of reservation of forest on the tribal life. The state forest officials blocked transportation of bamboo mats made out of tribal labour on the ground that they are forest produce. [5] Suresh Lohiya v. State of Maharashtra (1996) The Supreme Court held that when a product from bamboo is commercially different, it could not be treated as forest produce. [6][7] Lingappa Pochanna v State of Maharashtra (1985) and P Rami Reddy v State of Andhra Pradesh (1988) Both cases upheld the constitutional validity of the laws that barred alienation of tribal lands to the non-tribals, and facilitated restoration of such lands to the tribals.[8]

[3]The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006 (Act No. 2 of 2007).
[4]Constitution of India, Part III (Fundamental Rights) and Part IV (Directive Principles of State Policy).
[5]Fatesang Gimba Vasava v. State of Gujarat, AIR 1987 Guj 9.
[6]Suresh Lohiya v. State of Maharashtra, Criminal Appeal No. 430 of 1993 (Supreme Court of India, decided 23 August 1996).
[7]Indian Forest Act, 1927, Section 2(4) (definition of forest-produce).
[8]Lingappa Pochanna Appelwar v. State of Maharashtra, (1985) 1 SCC 479; P. Rami Reddy v. State of Andhra Pradesh, (1988) 3 SCC 433.

Hills Syndicate v North Cachar Hills Autonomous Council (2000) It was held that more rights and privileges to the tribal people living in tribal areas.[9] Narmada Bachao Andolan v. Union of India (AIR 2000) The writ petition had been filed against the construction of the Sardar Sarovar dam for violation of Right to life of the Tribals residing there. Since they were not provided with satisfactory relief and rehabilitation measures.[10]

Thematic Analysis

The case study selected by me with the broad theme of Human Rights and social Transformation in Environmental Law. We the human being as a creature of nature must be follow the natural law and moral principles for surviving ourselves and other creature of nature. In concern of the case study, we are discussing the two issues such as –

1. Impact of the deforestation on Indigenous Human Rights and
2. Displacement due to Environmental degradation - A Human Right Concern

Impact of the deforestation on Indigenous Human Rights

Forest is the natural resource available to us without any cost. But it is human tendency that, if anything available to us free of cost, we cannot be careful about it. Forest act as a carbon sink by absorbing the carbon dioxide around us and release the precious oxygen which is essential for the survival of life in all forms. In addition to these forests also have immense economic benefits. Forest can help in maintaining the ecological balance, adding to fertility of the soil and preventing soil erosion, providing shelter to wild animals and tribal population. Decide the environmental benefits forest bring revenue to the state, supply raw material to the industries and act as a source of fuel and fodder.

Environmental Impact due to deforestation

Deforestation is the one of the main causes of every kind of pollution and environment degradation. Global warming, ozone depletion, greenhouse effect throughout the world is due to increasing the temperature of the earth, no doubt it is happened because of deforestation, decline of natural resources and many more. The significance of forest is best explained by supreme court of India in Rural Litigation and Entitlement Kendra v. State of U.P (1988).[11] Forest needs to be protected to save our mother earth, therefore from colonial era to the modern time there is a various legislation for protection and preservation of forest and classified the forest in four categories. State empowers to take the land of the individual person for public purpose like construction of dam, road, railway track etc. through the concept of eminent domain. But sometime state uses their power for the purpose of globalization, privatization, industrialization, organization and displaced the tribal people who are lived their generation to generation.[12] No doubt the development project may help as for employment generation for local livelihood, but if they are not need about that so government can't be does it without the desires of local people. The tribal people have become strangers in their homes commercialization had set in and the forest had become the important source of raw materials to the forest-based industries & sometime multinational companies also. By an inequitable privatization of common property resources in favour of small elite, the law in fact worked against the interest of the rural & tribal people whose very existence had been dependent upon those resources.

Thus, these changes struck a blow to the symbiotic relationship between forest and the tribal people.

Criticism

Tribal ethos is different from those of non-tribal peoples. The forests are a national asset and the state has power to regulate it. However, in this process, it is neither fair nor conductive for the security of tribal life. If the regulation of the state makes arbitrary inroads into their traditional rights and lifeline. Under the constitution of India, the places of tribal provided under schedule – VI as tribal area like village Dhami in North Maharashtra.[13] Special regulations apply to tribal area where legislative, executive and judicial institutions different from those of rest of the country. General laws are in modified form apply to scheduled area. In tribal areas, autonomy of self-governing institution takes care of the transaction in Land. The legislative imposes the prohibition and restriction of the transfer of land of tribal people through the legislation. The scheduled Tribes and other Traditional forest Dwellers (Recognition of Forest Rights) Act, 2006.[14] This act is meant to recognize and provide the forest rights and occupation of forest land to forest dwelling scheduled Tribes and Traditional Forest dweller who have been residing in such forests for generation. The Government decision to develop the land of tribal by constructing the building for a multinational company was violative of the provision of above Act. It is a misuse and abuse of power by the state which violate the human rights of tribals as right to life and livelihood.[15] Again the state agency cannot be interface with their customary law and religious fraction and traditional management practices of community resources. The above Act was challenged on the ground of violates the right to equality, in the constitution. But it was found by the court of law that the law is meant for uplifting the scheduled Tribes. This law implements the Art – 46 of constitution "To

[9]Hills Syndicate v. North Cachar Hills Autonomous Council (2000).

[10]Narmada Bachao Andolan v. Union of India, (2000) 10 SCC 664; AIR 2000 SC 3751.

[11]Rural Litigation and Entitlement Kendra v. State of U.P., AIR 1987 SC 2187; (1989) Supp (1) SCC 537.

[12]Forest (Conservation) Act, 1980.

[13]Constitution of India, Fifth Schedule and Sixth Schedule (administration of Scheduled Areas and Tribal Areas).

[15]Constitution of India, Article 21. See also Olga Tellis v. Bombay Municipal Corporation, (1985) 3 SCC 545 (right to livelihood is part of right to life).

promote, with special care and their economic interest as an indigestion people of the society."[16]

Conclusion

The right to livelihood of tribal communities is an integral part of the right to life guaranteed under Article 21 of the Constitution of India. Forests are not merely a source of timber or revenue for the State; they constitute the cultural, spiritual and economic foundation of tribal identity. Displacement without free, prior and informed consent and without adequate rehabilitation violates both constitutional and international human rights norms. While the Forest Rights Act, 2006, represents a significant legislative attempt to correct historical injustice, its effective implementation remains the real challenge. Tribal people continue to face problems of lack of education, ignorance of law and inadequate reach of State agencies. The judiciary has played a crucial role in interpreting and enforcing tribal rights through various decisions, but the ultimate responsibility rests with the State to ensure that development does not come at the cost of the dignity and survival of the most vulnerable sections of society. Sustainable development must be rooted in the recognition that the protection of tribal rights and the conservation of forests are two sides of the same coin. Only when the State, judiciary and other stakeholders work together to uphold the human rights of tribals can we claim to be a truly civilized society that respects equality, dignity and the inherent worth of every human being.

Acknowledgement

I would like to express my sincere gratitude to all those who supported and encouraged me in completing this research paper on "Right to Livelihood of Tribals under Human Rights Perspective." I am deeply thankful to my institution and colleagues for their valuable guidance and academic support throughout this work.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030449

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22160751

DOI Link:
https://doi.org/10.5281/zenodo.22160751

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Role Of Blended Learning in Classroom Teaching

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Abstract
Blended learning is a modern teaching and learning approach that combines traditional classroom learning approach that combines traditional classroom learning with online and digital resources. it is a method that has gained popularity in recent year due to the increasing use of Technology, and the need for personalized learning blended learning is an effective way of delivery instruction that can help students to learn in different ways and at their own pace in the medium of this research paper. Researcher want to know how blended learning useful in the classroom teaching.

Key Words: *1) Blended learning 2) learning approach 3) Resources 4) Technology.*

Introduction

The rise of Technology and the growing demands of a digitally connected world have paved ways for innovative instructional approaches among these blended learning has emerged as a dynamic and adoption strategies that Bridges the traditional classroom experience with the boundless the traditional classroom experience with boundless possibilities of the online realm. Here we will begin a journey through multifoceted World of blended learning in classroom and its components deliver into its advantages and consider its challenges as we navigate technology and pedagogy. We will address educators and student concerns and consideration in this modern educational environment.

Concept Of Blended Learning.

Blended learning combine face to face classroom instructions with online learning experience in planed way also known as hybrid learning mixed mode learning Technology enhanced learning includes mix of synchornous and a synchornous learning open with paced elements. Blended learning is an educational approach that combines traditional in person classroom face to face instruction with online computer mediated learning it integrates the best elements of both environments to create a more flexible personalized and engaging student Centered.

Garrison & Kanuka (2004)

define it as the thoughtful integration of classroom face to face learning experience with online learning experiences they emphasize the quality of the mix rather than just combining random tools.

Margaret Driscol (2002)

Argues that it means different things to different people incompassing the combination of web-based Technology pedagogical approaches institutional Technologies and actual job tasks.

He Kekang (2004)

Defines it as the fusion of tradational Learning Methods With the advantages of Learning. In this Way above Definition Clear Our Concept about blended Learning.

Objectives Of Blended Leaning.

The primary objective blended learning is to integrate traditional and face to face classroom instruction with flexibility and interactivity of digital online learning this hybrid approach is designed to create highly personalised efficient and engaging educational experiences that indicates to diverse student needs.
Some key objectives as follows.

Personalization.
To accommodate Varying Learning Styles and Paces by Offering tailered digital resources alongside strucerd, teacher, led Sessions.

Enhanced Engagement.
To use Multimedia tools gamified Platforms and Collaborative Onlive Spaces to make learning more interactive and intreesting.

How to Cite this Article:
Harichandra, K. S. (2026). Role Of Blended Learning in Classroom Teaching. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 245–247. https://doi.org/10.5281/zenodo.22160751

Fostering Autonomy.
To Encourage students to take responsibility for their own Learning dynamics Providing Independent Study and critical thinking.
Digital Rediness.
To build essential ICT and and Digital fluency Skills for Success in technology driven globalized World.
Optimizing Teaching Time.
To free up face to face Classroom hours for deeper discussions, Problems Solving and hands On Activities Rather than just Possible Lectures.
So, in this Wayabove Objectives is very Crucial In blended Learning Process.
Characteristics Of Blended Learning.
Blended learning isn't just online homework to offline class it has specific fruits that make it different from Pure classroom or pure E learning.
Integrating Of Two modes.
face to face + Online Learning.
Combines in person teaching with digital tools like videos apps or simulation.
Purposeful Mix
Online parts arents add onus each mode is used for what it does best Videos for concept into, class time for discussion.
Student Centered and flexible.
Self-paced elements
Student can Pause rewatch or speed up online content based on their level.
Anywhere Access.
Part of the Learning happens outside school hours and walls.
Choice.
Often students choose when, where path or pace for online Components.
Teach Enabled but teacher Guided.
Teachers' role shifts. From stage to stage to guide on the side more time for coaching, feedback and small Group work.
Data Driven.
Online quizzes and Platforms trackes Progress to teachers to know who needs helps defines the test.
Active learning Resources.
Flipped Classroom.
Learn they at home, practice problems and do projects in class.
Interactive Contents.
Simulations Polls discussions forums gamified quizzes replace Possible note taking.
Collaboration.
Mixes with person group work with online does shared boards, and Peer feedback.
Variety of Learning Resources.
Multi Model.
Test, video, audio, worksheets, peer teachingns different formats for different learns.
1) Rich Content.
Brings experts, virtual labs and real-world case studies into class without travel or cost.
Refined time & Space.
1) Classroom Labs.
Physical time is used for higher order Skills debate and experimental presentation.
1) Types Blended learning.
Blended learning combines traditional and face to face instructions with online digital content. The most common types include revolue (students' cycle) between physical stations and online (learning, classroom new concepts at home via video and practicing in class) and flex curriculam deliver online with teachers providing on demand.
The most effective blended learning models can be broken down by structure and focus.
Rotation Model.
Student rotate between different learning situations on a fixed schedule.
Station Rotation.
Lab Rotation.
Individual Rotation.
Flex model.
The curriculum is primarily delivered online student move through their course Work at a flexible self-guided pace while the teacher provides onsite face to face Support, mentoring and small group instructions as needed.
Flipped Classroom Model.
Students are introduced to new instructional content, concept and videos lectures at home. Online in class time is then Repurposed for hands on activities, project based learning and personalized teacher guidance to apply the newly learned knowledge.
A La Carte Model.
Students take traditional courses at a bricle and mortar School but supplement their education with one or more online courses. This allows students to take specialised classes not offered by their physical School.
Self-Blended Model.
Students take traditional in person classes but choose to supplement their learning entirely with one or more online courses taken completely outside of standard brick mortal school day.
In this Way Above given blended learning type which is very useful for teaching learning process.
Blended Learning Support System.
Blended Learning Support system integrates Digital E- learning Platform Which tradational and face to face Classroom Instruction utilities a learning management Systeams to Combine flexible Self-Paced Online Course Work with Instruction Led Activities Optimizing the Overall educational Experience for both students and Instructer.
Digital Platform.
Systems such as Canvas LMS or blackboard learn delivered Course Materials, Video Lectures and assesment online.
Face to Face Instruction.
Traditional classroom time is Reserved for collaborative work interactive discussion and hands on guidence.
Analytics' Dashboard.
Built in tracking tools monitor student engagement identity. Learners who are full feeling behind provide actionable performance data to instructions.
Communication portals.

Forums instant messaging tools (like Zoom or Microsoft Teams) facilitate continuous out of class communication.

Teachers' role in Blended Learning.

In a blended learning environment, the teacher shifts from "traditional sage on the stage". To a guide on the side. Their primary role is to design engineering digital content facilitate interactive, face to face sessions and provide personalized coaching to help students navigate both online and in person learning.

Learning experience Designer.

Instead of simply delivering Lectures teachers Curate and Create digital resources Interactive models and Videos that transforms for fundamental Knowledge before Class.

Facilitator of Collaboration.

By Morning direct Instruction Online Class time is freed Up for group Discussion Peer to Peer Collaboration and hands On Problem based Learning activities.

Learning Coach Advisor.

Teachers Use data from Online Learning Platforms to tracks Students Progeress, identity Learning Gaps and Provide targeted Personalized Support to Struggling Students.

Learning Data Analyst.

They Analyze Metrics from Virtual Learning Environments to massive engagement, evaluate the effectiveness of the Curriculum and adapot future teaching strategies.

A highly effective blended teachers act as Catalyst ensuring the Seamless Connection Between Digital Instruction and face to face engagement for Deeper dive into the Dpecific Dynamics Of this Transition.

Blended learning Benifits.

It Offers Unparalleled Flexibility allowing Students to learn at their Own Pace While Skill benefitting from real time Instructor Support this approach increases engagement Caters to diverse Learning Styles and foster a Personalized Cost-effective educational experience the Primary advantages of adopting a blended Learning Approach include.

1) Personalized Learning.
2) Enhanced Flexibility.
3) Maximized Class Time.
4) Better Learning Outcomes.
5) Cost and Resources Efficiency.

In this Way Above given Benifits Of Blended Learning.

Conclusion.

In brief blended Learning bridge, the gap between Traditional and digital education. It provides Students with Flexibility and Personalized Learning by Maximizing face to face interaction for Collaborative tasks, it Improves Overall engagement Can Presentation and retention.

Acknowledgement

I would like to express my sincere gratitude to all those who supported and encouraged me in completing this research paper on "Role of Blended Learning in Classroom Teaching." I am thankful to my institution, Swami Vivekanand Gramin Shikshan Prasark Mandal Sanchalit Adhyapak Mahavidyalaya (B.Ed.), Loha, Nanded, for providing the necessary academic environment and support for this work.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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Manuscript ID:
TIJCMBLIR-2026-030450

Volume: 3

Issue: 4(II)

Month: August

Year: 2026

E-ISSN: 3065-9191

Submitted: 21 July 2026

Revised: 29July 2026

Accepted: 18 Aug. 2026

Published: 31 Aug. 2026

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DOI:
10.5281/zenodo.22199424

DOI Link:
https://doi.org/10.5281/zenodo.22199424

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Human Rights of Senior Citizens: A National and International Legal Perspective

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Abstract
Senior citizens constitute an important and growing segment of society whose rights and welfare require effective legal and social protection. The present study examines the human rights of senior citizens from both national and international legal perspectives. It discusses the constitutional safeguards available to elderly persons in India, particularly under Articles 38, 41 and 47, along with the obligations arising under Hindu and Muslim personal laws and the provisions relating to maintenance under the Bharatiya Nagarik Suraksha Sanhita, 2023. The study also examines the Maintenance and Welfare of Parents and Senior Citizens Act, 2007, which provides mechanisms for maintenance, protection against abandonment, property-related safeguards and welfare measures for senior citizens. In addition, the paper reviews various governmental initiatives and policies intended to promote social security, healthcare, housing and dignity among older persons. At the international level, it considers the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the United Nations Principles for Older Persons, the Vienna International Plan of Action on Ageing, and other relevant international instruments. The study emphasizes that legal protection alone is insufficient and that senior citizens also require social support, dignity, affection, care and emotional security. It concludes with recommendations concerning housing security, awareness of legal rights, public-private participation and greater social responsibility towards elderly persons.

Keywords: *Senior Citizens, Human Rights, Elderly Persons, Constitutional Protection, Maintenance and Welfare of Parents and Senior Citizens Act, 2007, Bharatiya Nagarik Suraksha Sanhita, 2023, Social Security, International Human Rights Law, Dignity, Elderly Welfare, Legal Protection.*

Introduction

Senior citizen means any person, who has attained the age of 60 years & above[1]. The elderly people serve as an excellent resource for these human resources in possession of different knowledge, experience, and insight. Though they may be formally retired, most of them are physically strong and observant of the happenings around them. This means that whenever they get a chance, they can play an important role in the socio-economic development of their country. Ageing involves a gradual decrease in the ability of body organs to function, and this process is mainly caused by physiological changes and not the end of the world. The number of elderly people has been increasing steadily due to advances in medical care, high standard of living, low birth rate, and long-life expectancy. There is also a very rapid demographic transition taking place in India. It is estimated that the number of people who are above 60 years in India will be about 156.7 million by 2024, which is close to 11% of the total population in India. This proportion is set to increase to about 21% by 2050, and India will be one of those countries having the largest number of elderly populations in the world. Rising population, aging population, low fertility levels, and changing familial relationships have resulted in emerging issues of healthcare, social security, economic independence, protection against abuse, and access to justice in the case of senior citizens.[2]

National Perspectives

Constitutional Protection-

Section 38: The State should establish social order that is meant for ensuring the welfare of the citizens.

How to Cite this Article:
Fulzalke, G. M., & Pawar, P. T. (2026). Human Rights of Senior Citizens: A National and International Legal Perspective. The International Journal of Commerce Management and Business Law in International Research (TIJCMBLIR), 3(4(II)), 248–251. https://doi.org/10.5281/zenodo.22199424

[1] Sec.2(h) The Maintenance and Welfare of Parents and senior citizens Act,2007

[2] https://www.who.int/news-room/fact-sheets/detail/ageing-and-health

In relation to ensuring the welfare of the citizens, the State should try to ensure and protect the social order as much as possible, where social, economic and political justice will guide all the institutions of national life through the reduction of inequality in terms of income. Art. 41: Subject to its economic resources and development, the State will provide effective measures to safeguard the right to work, education, and social services in certain circumstances for unemployment, old age, sickness, disability, and other instances of undeserved poverty. Article 47: The State must guaranty a high standard of living and nutrition and public health.[3]

Personal Laws Protection-

It is our moral responsibility to care for our parents. However, when considering it from the law's perspective, the responsibility differs in its nature and extent.

Hindus Laws:

From the very beginning of the Hindu religion, it was acknowledged that a son has the responsibility to support his parents if they cannot take care of themselves using their earnings. Hindu Adoption and Maintenance Act of 1956 reflects the maintenance liability of the parents within statutory Hindu personal law. This is the first personal law in India which mandates children to maintain their parents. From the language used in the section, it is clear that girls too have an equivalent duty towards their parents as boys. It must be remembered that this law only entitles parents to seek maintenance if they cannot take care of themselves.

Muslim Law:

As per Muslim Personal Law, the responsibility of children for maintaining their poor parents is both ethical and obligatory. Unlike Hindu law, which allows this right via the Hindu Adoptions and Maintenance Act, 1956, the basis of maintenance in Islamic law is Sharia law. Parents have a right of maintenance under the Islamic law recognized by Indian courts. This right of parents for maintenance is an obligation of a child who has the capacity to maintain his poor and old parents, and the foundation of this right is compassion, family duty, and social justice.

Under the laws of Muslims, there is a responsibility of children towards their old parents. According to Mulla:

a. "Though the poor parent can maintain himself, children in a prosperous condition will most certainly maintain him."

b. "Though poor, a son should maintain his mother."

c. "Though poor a son earning his living should maintain his unemployed father."

As per Tyabji, even though the ability to earn livelihood exists, poor parents or grandparents have the right to claim maintenance from their offspring as per Hanafi law.

Christian And Parsi Law

There are no personal laws pertaining to parental maintenance for Christians or Parsis. To request maintenance, parents must apply in accordance with the Criminal Procedure Code.

Section 144 of the Bhartiya Nagarik Suraksha Sanhita, 2023 (BNSS) now includes the section that corresponds to the CrPC. When it is discovered that a child has the means to pay maintenance but has neglected or refused to do so, a Judicial Magistrate may order to pay maintenance to a parent who is unable to support themselves under section 144.

The Maintenance and Welfare of Parents and Senior Citizens Act, 2007 is a specific legal provision that allows senior citizens of the Christian and Parsi religions to seek maintenance, welfare, and protection from neglect. The Act establishes Maintenance Tribunals that have the authority to order children or family members to provide monthly maintenance to an elderly person who is unable to support themselves. It offers an additional remedy allowed by Section 144 of the BNSS.

Part III Under Bhartiya Nagarik Suraksha Sanhita 2023

Code of Criminal Procedure, 1973 has been substituted and repealed by Bhartiya Nagarik Suraksha Sanhita 2023 and came into force from 1st July 2024 but the provisions related to maintenance of wives, children and parents has mostly been retained through section 144 of BNSS, which is similar to previous section 125 of CrPC.

Law Commission of India had some reservations about necessity of having such a provision and pointed out that in case of maintenance of parents, it would usually be decided by civil court owing to the intricacies involved in the process of calculation of maintenance and distribution of liabilities between the children. In spite of all these reservations, it was made a definite provision under Section 125 of CrPC, 1973 that an expeditious and economical relief be provided to the needy parents. This provision of law is also applicable under Section 144 of BNSS 2023, in which a person having sufficient means can make monthly allowances for the maintenance of his wife, whether legitimate or illegitimate minor or adult children who are incapable of maintaining themselves due to any physical or mental disability, as well as his parents who are not capable of supporting themselves.

Governmental Protections:

1. On 13th January, 1999, the Government of India enacted the National Policy for Older Persons in order to promote welfare measures and empower the elderly for their benefit. **The key actions taken under this policy included the following:**

(i) Setting up a pension fund to ensure security of persons working in the unorganized sector;

(ii) Providing day care centers and old age homes in each of the three-four districts;

(iii) Giving fifty percent discount in Indian Airlines and thirty percent in train tickets for intercity and intracity travel.

(iv) Enactment of legislation providing geriatric care in all public hospitals.

[3] Art.38,41,46,47 of Constitution of India (Directive Principle of State Policy)

2. The Ministry of Justice and Empowerment has declared the establishment of a National Council for Older Person known as age well Foundation which would interact with the elderly and make their life easy by adopting the aged-on measures.
3. An attempt is made to sensitize school children about living and working with the elderly people. Around the clock help line and not to ostracize the older persons socially is taken up.
4. There is government policy which supports quick settlement of pension, provident fund (PF), gratuity, etc. so that superannuated people may not face any hardship.
5. Section 88-B, 88-D, 88-DDB of Income Tax Act give tax discount for senior citizens.
6.For the welfare of elderly or senior citizens, there are many programs launched by the Life Insurance Corporation of India (LIC), like Medical Insurance Yojana, Senior Citizen Unit Yojana, Jeevan Dhara Yojana, and Jeevan Akshay Yojana.
7. Another yojana was started by the former Prime Minister of India A.B. Bajpai which is named as "Annapurana Yojana" for the welfare of elderly citizens. This yojana provides food in the amount of 10 kg per month to unsupervised elderly citizens.
8. It is suggested that 10% of homes made through government programs must be provided to elders on easy loans who belong to the lower economic category.

The Maintenance and Welfare of Parents and senior citizens Act,2007

According to this Act, parents, and elderly person (above 60 years) who have become incapable of sustaining themselves have the right to claim maintenance from their children and relatives.

In case where an elderly person is incapable of lodging a maintenance petition, any parent or any other individual or organization authorized by the elderly person may do so, for example a registered NGO, may lodge the petition.

Now, the abandonment of aged persons is a cognizable offense. Any individual who has the responsibility to take care of or protect the elderly person, but leaves him/her at any place with the intention of abandoning him/her, shall be sentenced to a jail term not exceeding three months along with a fine of not more than Rs.5,000/.

The Act provides maintenance not exceeding Rs. 10,000 per month, along with interest not less than 5% and not more than 18%.

The Act recognizes Maintenance agreement against transfer of property by senior citizens, when the transferee fails to provide such promise, transfer of property is deemed to be fraudulent & void. State Govt shall establish old age home in each district and provide facilities [4]

International Perspective-

The first time the matter of aging came up in the United Nations was in 1948, at the instance of Argentina. This issue came up again in 1969 at the instance of Malta. Following a request made in 1971 for the Secretary-General to submit a detailed report on the situation of the elderly in the nation as well as recommendations for national and international actions, the United Nations General Assembly decided to convene a World Conference on Aging in 1978.

An International Plan of Action on Aging was adopted at the World Assembly on Aging held in Vienna between July 26 and August 6, 1982. The main aim of the Plan was to assist nations in handling the matter of aging of their populations with special emphasis on the unique problems and needs of the elderly. In addition, the Plan aimed to sensitize people on issues related to humanitarian and development problems as well as social, economic, and cultural issues arising from aging. The International Plan of Action on Aging was adopted in 1982 and governments were encouraged to implement the recommendations and principles contained in the Plan.

i) The United Nations General Assembly passed the proclamation in 1992 and 1999 was recognized as the International Year of the Older Persons.

ii) "October Ist" was observed as the International Day for the Elderly, which was later changed to the International Day of the Older Persons by the UN General Assembly.

iii) On December 16, 1991, the United Nations General Assembly established eighteen guiding principles for older persons under five broad categories: independence, participation, care, self-fulfillment, and dignity of the elderly.

Universal Declaration of Human Right-

As per Article 25, paragraph 1, it is established that "everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing, and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control." security rights include healthcare rights, because of aging, it is not able to afford or monitor healthcare by self-help.

Convention Relating to the Status of Refugees (1951)

This convention provides that the state will grant refugees who are lawfully residing within its territory the same rights that would be accorded to other citizens, such as a provision for social security of the refugee if he becomes sick or old.[5]

International Covenant on Economic, Social and Cultural Rights (1966)

Social security is guaranteed for all by this treaty. Also, everyone has the right to improved standards of living such as adequate housing, food, and clothing. This could imply that governments should always work to improve everyone's quality of life, including those receiving state care, such as the elderly.[6].

[4] sec.19

[5] Article 24

[6] Article 9, 11, 12

The Declaration on the Rights of Disabled Persons (1975)

Disabled persons are usually elderly and therefore the rights of this Declaration extend to them. Persons with disabilities are entitled to all kinds of employment which would assist them in living in a manner as respectful as possible. All disabled persons must be protected from abuse and exploitation. Organizations representing disabled persons must consult with them regarding issues relating to their rights.

ILO Recommendation No. 162 on Older Workers (1980) (part II, section 5(g))

This recommendation provides that the older worker should have equal opportunities and treatment along with other workers without any discrimination on account of age, including housing facilities, social services, and health care institutions in particular.

The Arab Charter on Human Rights 1994

Every member of the states in the League has the entitle to have security that covers everything.[7]

The American Declaration of the Rights and Duties of Man, 1948

It says that everyone has the right to be healthy long as the community or country has the resources to make that happen. It also says that when people get old, they should get security so they can have a good life.[8]

Conclusion

Elderly citizens require not only economical satisfaction and physical satisfaction but they also require something that cannot be provided under the law such as love and affection and emotional support. In place of these, there is a requirement to give rights and privileges to the elderly citizens.

All these points of view considered and taken into account; the following recommendations can be drawn.

- Special provision for housing security should be made for senior citizens. Appropriate measure by government to make them aware of their rights as senior citizens is required.
- Public-private partnership through media is needed for creating awareness regarding the rights of senior citizens.
- People must be aware of their social responsibilities toward the senior citizens.

Acknowledgment

The authors would like to express their sincere gratitude to all those who supported and encouraged them in completing this research paper entitled "Human Rights of Senior Citizens: A National and International Legal Perspective." We are deeply grateful to our respected institution and colleagues for providing valuable academic support, guidance, and encouragement throughout the preparation of this study.

Financial support and sponsorship

Nil.

Conflicts of interest

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

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