

Journal of Kolkata Society for Asian Studies : Vol. 10. No. 2, Dec. 2024

From Water to Rights: The Malo Fisher Folk's Political Journey in Bengal

Paramita Bhattacharya

From Water to Rights: The Malo Fisher Folk's Political Journey in Bengal

Paramita Bhattacharya

Abstract:

Historical inquiries into twentieth-century South Asia have often focused on the shift from caste-based awareness to political consciousness. Yet, scant attention has been given to the caste and political consciousness of the Malo community in this region. A thorough examination would reveal that the Malos sought to challenge traditional perceptions of their caste identity to shape their narrative. Over time, this endeavor evolved into a political awareness, particularly gaining momentum in the second quarter of the twentieth century. The Malo community actively engaged in the electoral processes of late colonial Bengal, espousing both nationalist and class-oriented perspectives. This article aims to provide a balanced analysis, situating the caste assertion of Bengal's Malo community within its historical context.

Keywords : *Communal Consciousness, Caste Avowal, Malos, Scheduled Castes, Caste Politics*

Introduction

The evolution from 'caste consciousness' to political awareness was a common narrative among the prominent Scheduled Caste communities in late colonial Bengal. Alongside other significant Scheduled Caste groups such as the Rajbanshis, Namasudras, and Poundras, the Malos (Malla Kshatriyas), a notable fishing community in Bengal, embraced colonial rule with a positive perspective. They not only challenged the conventional perceptions of their caste identity propagated by leading scholars but also crafted their own historical narrative using available theoretical frameworks and historical sources. This proactive stance by the Malos gradually evolved into a political consciousness by the second quarter of the twentieth century. They were actively engaged in the electoral politics of late colonial Bengal, expressing both nationalist and class-oriented perspectives (Banerjee, 1990).

The Malos, also known as Jhalo Malos, originating from the fishing communities of Eastern and North-eastern India, including present-day Bangladesh, have inhabited these regions since ancient times. References in precolonial Bengali and Kamrupi literature attest to the presence of this community in the riverine regions of Bengal and Assam. However, estimating their population and way of life before colonial rule presents significant challenges. Among colonial administrative scholars, Buchanan Hamilton was among the first to provide a detailed account of the Malos. During his survey (1807-1814 CE) across various districts of Assam and Bengal, Buchanan described the social, economic, and cultural aspects of the Malos in areas like Calcutta, Dinajpur, Goalpara, Rangpur, and Mymensingh (Barman, 2008).

Subsequently, with the commencement of population censuses in India in 1871-72, the Malos garnered considerable attention from the colonial government. Census data from the late nineteenth and early twentieth centuries (1872-1941) reveal that the Malos were primarily concentrated in districts such as Mymensingh, Tipperah (Comilla), Dacca, Pabna, Jessore, Khulna, Nadia, Murshidabad, Hooghly, Rangpur, Rajshahi, 24 Parganas, Faridpur, and Bakharganj. All of which were rich in rivers and other water bodies. Colonial administrative scholars also provided insights into the racial and physical characteristics, as well as the social status, of the Malos. Dr. James Wise (1835-1886), a notable ethnographer of Dacca, documented some of these aspects in 1883 and wrote: "*They (Malos) are remarkable for strength, nerve, and independent bearing. The fine examples of Bengali manhood are found among them, and their muscular figures astonish those inhabitants of towns.*" (Barman, M. M., 1323 BS/1916CE)

This indicates the Malos possessed greater resilience compared to the general populace of Bengal. H.H. Risley, in his work "Tribes and Castes of Bengal" (1891), suggested that 'the Malos represent the remnants of a distinct indigenous tribe rather than solely an occupational group.' Thus, colonial accounts imply that the Malos were and are indigenous to Bengal (Das Ray, 1314 BS/1921CE).

Caste Consciousness and Malo Community

The educated Malos (particularly lawyers, teachers, officials and other white color job holders) had come forward to develop a sense of 'self-respect' to fight against social injustice. Initially, the Malos had emphasized their structural integration through the foundation of an organization of their own. In 1913, they founded the 'Jhalla Malla Kshatriya Samity' to place the Malos as a respectable 'Kshatriya' caste community of Bengal. Within a decade; this organization became popular among the Jhalo Malos. The Malos of several villages and towns of Eastern Bengal and Assam (with their local bodies) was greatly organized by this association (Barman, 2018).

The second step of the social movement of the Malos was the construction of a history of their culture, society and Kshatriya hood. In the case of the Malos, this trend was initiated by Mahendranath Malla Barman of Chhatrapur (Mymensingh). With the support of Dinanath Malla Barman of Achargram (Nandail), Mahendranath produced an excellent historical work on the Malos of Bengal called '*Dwitiya Varna Kshatriya Ba Jhal-Mal Tattwa: Pratham Bhag* (Mymensingh, Dinanath Malla Barman, 1914).' He published the second part of his work as '*Sanscripta Kshatriya Tattwa: Dwitiya Bhag*' in 1916. In these works, Mahendranath had claimed that the Jhalos had migrated to Bengal from Jhalwar of Rajasthan and the Malos from Mallagarh of Northwestern India. Both the Jhalos and Malos were the descendants of the Kshatriya dynasties of those regions. They took up fishing as an occupation in Bengal which was in no way an inferior one in the ancient period. He wrote, "*Fish is a common item in the life and culture of the people of Bengal. It has every respect in society. So as a profession, fishing should be respected in society.*" (Barman and Sarkar, 2020)

Mahendranath had argued with testimonies that 'fishing' and 'selling of fish' as professions are in no way substandard. Therefore, as fishermen, the Malos deserve respect.' And as the successors of the Kshatriyas of Rajasthan, the Malos of Bengal must adopt Kshatriya surnames as a symbol of their

respectable caste identity. He suggested the Malos to accept the surnames like, Jhal Barman, Jhalla Barman, Mal Barman, Malla Barman, Mal Barma, Jhal Barma, Das Barman, etc. (Chattopadhyay, 1984).

Mahendranath Malla Barman's work inspired the Malos of different districts of Eastern Bengal for writing their history. Hence the Malo scholars of Bengal produced several other historical pieces, namely, *Jalla Malla Kshatriya Itihas* (1920) of Brajanath Das Barman, *Jyoti* (1921) of Shashi Bhusan Das Ray, *Sanschipta Jalla-Malla Kshatriya Tattwa* (1923) of Dharmachand Malla Barman and some other books. These works strengthened the arguments of Mahendranath Malla Barman in respect to the Jhalla-Malla Kshatriya identity of the Malos as well as highlighted their achievement in different fields. These works also contributed to integrating the Malos as a distinct caste community of Bengal (Risley, 1981)

Bengal and Malo Community

In 1924, Mahimchandra Malla Barman composed supplementary historical documents on the Jhalo Malos. In his work titled '*Jhalla-Malla Parichay*' Mahimchandra added sixteen appendices for fortifying the previous historical construction of the Malo scholars (published since 1914 to 1923). With the self-constructed history, the Malos had started unifying their caste fellows of Bengal, mainly of Mymensingh, Dacca, Pabna, Bogra, Tipperah, Jessore, Nadia, Murshidabad, 24 Parganas, Faridpur etc and of Sylhet and Goalpara from Assam. They had also started publishing a journal called '*Jhal Mal Badhanv*' specified for their caste (Barman, 2020a)

All these activities of the Malos had given rise to a sense of belonging among them, especially in the early twentieth century. In 1923 Dharmachand Malla Barman had prepared a list of villages and towns of Bengal with the considerable emphasis on the caste movement of the Malos. From his work, it appears that the Malo of erstwhile Mymensingh, at present comprising Mymensingh, Netrokona, Sherpur, Jamalpur and Kishoreganj; erstwhile Bogra-Pabna, presently comprising of Bogra, Sirajganj, Natore and Pabna; erstwhile Tipperah presently Comilla and Brahmanbaria; erstwhile Dacca presently of Tangail, Gazipur, Narasindi, Manikganj, Dhaka, Narayanganj and Munshiganj; erstwhile Jessore, present day Jessore, Meherpur, Chuadaga, Jhinaidaha, Magura and Narail; erstwhile Murshidabad, present say Nadia, 24 Parganas of Bengal; erstwhile Dhubri-Goalpara and Sylhet comprising of present day Sunamganj, Sylhet, Maulavi Bazar and Habiganj of Bangladesh part of Assam were considerably influenced by the Malla Kshatriya movement. It appears that the Malos of Eastern Bengal were organized under their Jhalla Malla Kshatriya Samity having its branches and organizers in different towns, markets and villages.

The third step of *kshatriyaization* of the Malos was the adoption of rites, rituals and sacraments (*sanaskaras*) of the upper caste Hindus of Bengal. Earlier, the Malos used to follow 30 days post-death pollution (*ashouch*, for maintaining social distance) in their society. But this position was changed in the early twentieth century. Instead of 30 days, they had introduced the ritual of performing *shraddha* on the 13th day after the death of any member of the family. They had also adopted Kshatriya surnames like Barman, Malla Barman, Jhalla Barman, Das Barman, Mal Barman, Malla Das, etc.²³ [instead of

surnames (like Malo, Majhi, Patra and Bapari) as recorded by H.H. Risley in the last decade of the nineteenth century].²⁴ Simultaneously, the Malos had also started holding sacred thread (*paita*) after performing certain Vedic rituals (*Bratyostom Yagna*) approved by the Brahmin priests. (Barman, 2019b)

Dr. Sashi Bhusan Ray Barman (a Malo doctor of Toknayan Bazar of Dacca) organized a huge gathering of the Malos in 1932 where Digindra Narayan Bhattacharya (a Congress-cum-Hindu Mahasabha activist) had recognized the Kshatriyahood of the Malos. This gesture of the Hindu Mahasabha had fulfilled the aspirations of *Kshatriyahood* of the Malos of Bengal. However, the Malos had accepted the Scheduled Caste status (in 1936) without much criticism. While the Malo scholars had advocated for Kshatriyahood and the adoption of sacraments of the upper castes but they did not contempt their traditional livelihoods. Rather, they always looked into their caste-based occupations as a matter of pride. Thus Mahendranath Malla Barman wrote in 1914 that ‘profession cannot destroy the caste of any community. Since we eat fish we must catch them. (Barman, 2019c)

Incidentally, NBOAPMS had received the attention of the Swarajya Party [founded by Chittaranjan Das (1870-1925, a prominent lawyer and a politician of Bengal) and his close supporters]. The Swarajist leaders like Hemanta Kumar Sarkar (1897-1952), and Hemaprabha Majumder were very much active in NBOAPMS. In its third conference (held at Madaripur of Faridpur district on 11-12 March 1926) NBOAPMS showed its interest in the working-class movement for the protection of the rights of the Malos (Barman, M., 1331 BS/1924C).

Political Consciousness and Malo Community

The social assertion of the Malos took a new turn at the beginning of the 1930s when they got interested in the political mobilization of their caste consciousness. There were of course several causative factors for this transition. Firstly, the demand of the Jhalo-Malos for Malla Kshatriya identity was accepted by the colonial government, especially in the census of 1931 followed by the recognition of the Hindu Mahasabha (1932). Secondly, communities like the Rajbanshis, the Poundras and the Namasudras took interest in the provincial electoral politics which had induced the Malos for their political empowerment. In such a background, the Malos had proceeded to the election of 1937 [the first election held under the *Government of India Act* (1935) for the Legislative Assemblies of British-ruled provinces]. Two provinces of British India like Assam and Bengal were suitable for their political empowerment (Barman, M. M., 1321 BS/1914CE) Though the Malos had a comparatively less population in the districts of Assam (Goalpara and Sylhet), the districts of Eastern and Central Bengal (particularly Mymensingh, Tipperah, Pabana, Bogra, Faridpur, Nadia, Jessore, Murshidabad and 24 Parganas) were full with Malo population. The Nikhil Bangiya Assam Pradeshia Matsyajibi Samity (NBOAPMS) was interested to ensure the rights of the fishermen and fish traders and retailers. On the other hand, the Bangiya Malla Kshatriya Samaj Unnayan Sabha [BMKSUS (centred in Calcutta, founded in 1932)] was engaged in the educational attainment of the Malos especially to facilitate the Malo students in the urban centers (particularly in Calcutta and Dacca) (Barman, 2019).

The Nikhil Bangiya Assam Pradeshia Matsyajibi Samity (NBOAPMS) was interested to ensure the rights of the fishermen and fish traders and retailers. On the other hand, the Bangiya Malla Kshatriya Samaj Unnayan Sabha [BMKSUS (centred in Calcutta, founded in 1932)] was engaged in the educational attainment of the Malos especially to facilitate the Malo students in the urban centers (particularly in Calcutta and Dacca). Despite the limitations of the Malos, we have noticed that a few Malo leaders [from the Malla Kshatriya Samity] had contested the election of 1937 from several non-Muhammedan constituencies. Among them, Ram Ratan Barman, Dwarakanath Malla Barman, Harendra Kumar Malla Barman, and Jogesh Chandra Malo were prominent. However, they could not get victory in any constituency. Harendra Kumar Malla Barman, on the other hand, had contested the election as a candidate of the Indian National Congress (INC) from Tipperah SC-Reserve Constituency. He was defeated by Jagat Chandra Mondal (a Namasudra independent candidate). Similarly, Jogesh Chandra Malo was defeated by Birat Chandra Mondal (an influential Namasudra leader) in Faridpur Constituency. It means the Malos could not send any representative to the Legislative Assembly of Bengal. However, the success of the Namasudra, Rajbanshi, and Poundra lawyers and land-owning classes (as MLA) had inspired many Malos to be prepared for future electoral contests. The Independent Scheduled Caste MLAs, however, had organized themselves in the Legislative Assembly under the umbrella of a newly formed 'Independent Scheduled Caste Party' (ISCP, 1938).

The force that influenced the Scheduled Castes in 1946 was the Hindu Mahasabha (HM). Even though the caste Hindu traditions made the Scheduled Castes 'outcastes or untouchables' but in the election, they were accepted with great enthusiasm by the Hindu Mahasabha. The success of the Scheduled Caste Hindu Mahasabha candidates was comparatively higher than the non-SC candidates. Among them, Kanti Bhusan Biswas (Jessore: 8,367), Kshetra Mohun Sikdar (Faridpur: 9,743) and Manmohan Das (Mymensingh: 13,971) got a considerable percentage of votes although they could not turn out as MLAs. The election records of 1946 show that these three candidates got 40% of the votes secured by the Hindu Mahasabha in the election 1946. The communal tension and violence for the Pakistan demand of the Muslim League, an outbreak of the *Tebhaga* movement (1946) led by the Scheduled Caste peasantry with the moral support of the urban educated non-Scheduled Caste Communists and other political developments had submerged the whole of Bengal under political uncertainty. The condition was further worsened with the publication of the proposal of the Cabinet Mission (on May 16, 1946).

From Bengal, 25 Congress members were elected to the Constituent Assembly including 3 SC members. However, the non-Congress Scheduled Castes found that their future would be unsaved in the newly formed Constituent Assembly since Dr. B. R. Ambedkar and the AISC could not send their representatives (Barman, 2019d).

The Muslim League was not ready to work with Congress. Rather it adopted a resolution in Bombay (on 19th July) for 'Direct Action' for attaining Pakistan. The Working Committee of the Muslim League had preferred 16th August as the 'Direct Action Day'. 'Direct Action' turned violent in Calcutta resulting in murder, rape, indiscriminate killing of the Hindus and destruction of their properties which became infamous as the 'Great Calcutta Killing' in the history of the Indian subcontinent. <https://archive.org/details/in.ernet.dli.2015.316801>, 2024)

Fazlur Rahman, Tarak Nath Mukherjee, Nagendra Nath Roy (an SC MLA of the Rajbanshi sub-caste), and Dwarkanath Baruri were given a berth in the Ministry of Suhrawardy (on 25 November 1946). [The last two were allied with Jogendra Nath Mandal and actively involved in Ambedkar's election to the Constituent Assembly through the Malo MLAs were excluded from ministerial power] https://archive.org/stream/in.ernet.dli.2015.37999/2015.37999.The-Calcutta-Gazette-1932-July-September_djvu.txt, 2024)

However, the League's entry into the government did not stop the communal tension. Even the Muslims (with the support of the Muslim League) had started forced conversion, murder, burning, and destruction of properties of the Hindus, raping, abduction, and forced marriage of the Hindu womenfolk including the Scheduled Castes at Noakhali and Tipperah in East Bengal (with an organized way) (Barman, 2020). This trend resulted in the forced migration of the Hindus (including the SCs) from Noakhali and some other places of East Bengal (Singh, A. I., 1991)

Finally, the *Indian Independence Act* was ratified on 18th July 1947 in the British Parliament and Bengal and Punjab were divided by 15th August 1947 to form independent India and Pakistan. Partition of Bengal and Punjab appeared before the people of the respective provinces as a serious threat that had generated the forces of forced migration from both sides of the newly created states (PROF. REHAN, 2024). The Malos of Eastern Bengal could not escape from this trend. Along with minority communities, a huge number of the Malos of East Bengal had migrated to West Bengal, Assam, Tripura, Meghalaya, and other states of India (Paschima Bangla Matsyajibi Samity, 1983).

Judicial Analysis :

The Supreme Court has issued several landmark judgments related to the rights of Scheduled Castes (SCs), which include communities like the Malos. The Supreme Court of India has analysed various Constitutional Provisions like Article 14, 15, 19, 23, 24, 29, 30, and 32 in this regard. These judgments have set precedents and established principles that apply to the protection and enforcement of constitutional rights for marginalized communities. (<https://www.jstor.org/stable/4416612>)

In the case of *State of Kerala v. N.M. Thomas (State Of Kerala & Anr vs N. M. Thomas & Ors n.d., 490)* Supreme Court affirmed the importance of reservation policies for Scheduled Castes and Scheduled Tribes in government employment. The Supreme Court emphasized the need for affirmative action to uplift these communities and ensure their representation in public services (*State Of Kerala & Anr vs N. M. Thomas & Ors*, 1976).

The *Indra Sawhney v. Union of India (Indra Sawhney Etc. Etc vs Union Of India And Others, Etc. Etc. on 16 November, 1992 n.d., 477)* Commonly known as the Mandal Commission case, this judgment addressed reservations in public employment and upheld the constitutional validity of reservations for SCs, Scheduled Tribes (STs), and Other Backward Classes (OBCs). While not specific to Malo communities, it reaffirmed the principle of affirmative action for marginalized groups. (<https://indiankanoon.org/doc/1218090>, 2024)

In *M. Nagaraj v. Union of India*, the Supreme Court laid down guidelines for providing reservations in promotions for SCs and STs in government jobs. The judgment clarified that the state

must collect quantifiable data to demonstrate the backwardness of these communities before providing reservation in promotions (M.Nagaraj & Others vs Union of India & Others, 2006).

B.K. Pavitra v. Union of India Case dealt with the implementation of reservation policies in Karnataka. The Supreme Court emphasized the importance of collecting empirical data to justify the extension of reservation benefits to specific communities and ensuring their effective implementation.

While these cases do not directly address the Malo communities, they establish broader principles related to the constitutional rights of Scheduled Castes and marginalized groups. The legal framework and principles established in these cases can be invoked to protect and enforce the constitutional rights of Malo communities as well. It's essential for legal advocates and policymakers to interpret and apply these judgments in a manner that addresses the specific socio-economic challenges faced by Malo communities. (Singh, I., 2008)

Concluding Remarks

In conclusion we can say that, initially, the caste movement among the Malo community mirrored characteristics akin to the 'Sanskritisation process', primarily influenced by the 'demonstration effect'. However, the subsequent phase diverged. Malos began to embrace and take pride in their occupation rather than abandoning it. In the third stage, their caste consciousness evolved into political awareness. Consequently, they engaged in political movements led by various groups such as the Indian National Congress, Hindu Mahasabha, and Communists. However, the partition of Bengal in 1947 resulted in the dispersal of Malos, relegating them to the status of a marginalized caste community in Bengal (Barman, M. M., 1321 BS/1914CE).

The exploration of political mobilization among Bengal's Malo fisherfolk reveals a multifaceted journey marked by resilience, adaptation, and challenges (Barman, K., 2001).

The transition from caste consciousness to political awareness illustrates the community's ability to navigate complex socio-political dynamics and assert their agency within the colonial and post-colonial contexts. The evolution of the Malo community's political consciousness highlights the intersections between caste, occupation, and political identity. Initially influenced by processes such as Sanskritisation, the Malo caste movement gradually transformed as the community developed a sense of pride in their occupation and actively engaged in political movements (Martin, 1976). Their participation in various political groups, including the Indian National Congress, Hindu Mahasabha, and Communist parties, underscores their quest for representation and empowerment. However, the partition of Bengal in 1947 posed significant challenges, leading to the dispersal of Malo communities and further marginalization. Despite these obstacles, the study of political mobilization among Bengal's Malo fisherfolk sheds light on the resilience and determination of marginalized communities to assert their rights and aspirations within the broader socio-political landscape (Mitra, 1953).

Overall, Beyond Caste: Political Mobilization among Bengal's Malo Fisherfolk provides valuable insights into the complex dynamics of identity, politics, and social change, emphasizing the importance

of understanding the experiences and struggles of marginalized communities in shaping the trajectory of history.

References:

- Banerjee, Dilip. 1990. *Election Recorder*, Book Front Publication Forum, Calcutta.
- Barman, Kiran Chandra. 2001. 'Amar Smritite Adwaita Malla Barman', in Susanta Halder (ed), *Bhasaman-3*, Kolkata, Adwaita Malla Barman Educational Society, Kolkata
- Barman, Mahendranath Malla. 1321 BS/1914CE. *Dwitiya Varna Kshatriya Ba Jhal-Mal Tattwa: Pratham Bhag*, Mymensingh, Dinanath Malla Barman,
- Barman, Mahendranath Malla. 1323 BS/1916CE. *Sanschipta Kshatriya Tattwa': Dwitiya Bhag*, Mymensingh, Jhalla Malla Kshatriya Samity,
- Barman, Mahimchandra Malla. 1331BS/1924CE. *Jhalla Malla Parichay*, Nikli, Jhal Mal Samity,
- Barman, Rup Kumar. 2008. *Fisheries and Fishermen: A Socio-economic History of Fisheries and Fishermen of Colonial Bengal and Post-Colonial West Bengal*, Abhijeet Publications, Delhi
- Barman, Rup Kumar. 2018. Right Left Right: The Scheduled Castes in West Bengal Assembly Election (1920-2016), *Contemporary Voice of Dalit*, 10(2): 216-231
- Barman, Rup Kumar. 2019. *Caste, Class and Culture*, Abhijeet Publications, Delhi
- Barman, Rup Kumar. 2019. *Caste, Class and Culture: the Malos, Adwaita Malla Barman and History of India and Bangladesh*, Abhijeet Publications, Delhi
- Barman, Rup Kumar. 2019. *Caste, Politics, Casteism and Dalit Discourse*, Cognition Publications, Kolkata
- Barman, Rup Kumar. 2019. *Fisheries and fishermen*, Abhijeet Publications, Delhi
- Barman, Rup Kumar. 2020. *Caste, Politics, Casteism and Dalit Discourse*, Abhijeet Publications, Delhi
- Barman, Rup Kumar, and Sarkar, Krishna Kumar. 2020. *Malo Jatir Itihas O Akar Grantha*, Cognition Publications, Kolkata
- Chattopadhyay, Gautam. 1984, *Bengal Electoral Politics and Freedom Struggle 1862-1947*, South Asia Books, Delhi
- Martin, Montgomery, 1976. *The History, Antiquities, Topography and Statistics of Eastern India*, Cosmo Publications, Delhi
- Mitra, A, 1953. *The Tribes and Castes of West Bengal, Calcutta*, West Bengal Government Press, Calcutta.

From Water to Rights: The Malo Fisher Folk's Political Journey in Bengal

- *Paschima Bangla Matsyajibi Samity, Bhagirathi*, 1983 Special Issue published on the occasion of 3rd Conference of the West Bengal Fishermen Conference held at Berhampur 6-8 June 1986, Berhampur, Conference of the West Bengal Fishermen Conference:3
- Risley, H.H. 1981. *The Tribes and Castes of Bengal*. first published in 1891, Bengal Secretariat Press, Calcutta.
- Singh, Anita Inder. 1991, *Origins of Partition*. Oxford University Press, Delhi.
- Singh, Inder. 2008. Abul Kalam Azad and Coalition Politics, *The Indian Journal of Political Science* 69, (4): 879-888

Website Links :

<https://ebooks.inflibnet.ac.in/hrdp04/chapter/cultural-rights-in-the-indian-constitution-and-case-law> (Accessed on 10th May, 2024)

<https://indiankanoon.org/doc/1218090> (Accessed on 11th May, 2024)

PROF.REHAN, <https://ebooks.inflibnet.ac.in> (Accessed on 10th June, 2024)

<https://archive.org/details/in.ernet.dli.2015.316801> (Accessed on 29th June, 2024)

https://archive.org/stream/in.ernet.dli.2015.37999/2015.37999.The-Calcutta-Gazette-1932-July-September_djvu.txt (Accessed on 29th June, 2024)

<https://www.jstor.org/stable/4416612> (Accessed on 29th June, 2024)

<https://www.gssmp.in/assets/pdf/Volume-8Number-1,June-2022/3.pdf> (Accessed on 24th July, 2024)

Case References Cited :

Indra Sawhney Etc. Etc vs Union Of India And Others, Etc. Etc. on 16 November, 1992, AIR1993SC477

M.Nagaraj & Others vs Union of India & Others on 19 October, 2006, AIR 2007 SC 71

State of Kerala & Anr vs N. M. Thomas & Ors, AIR 1976 SC 490

B.K. Pavitra vs Union of India on 10 May, 2019, AIR 2019 SC 2723, AIRONLINE 2019SC 275

Bio Profile of the Author :

Assistant Professor, School of Law
Brainware University, Barasat, India
mailtoparamita84@gmail.com

