

# Justice for the Marginalized in a Constitutional Democracy

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## Abstract

This article draws attention to the historical context of the Criminal Tribes Act 1871 to throw light on how colonial logic worked with the existing caste structures in India to produce a unique form of legal and social disadvantage for these communities. It deals with how the constitutional promise of equality recognizes these historical wrongs and places responsibility on society and the State to correct them. The article then discusses the social and legal challenges that these communities continue to face even today. Lastly, it proposes that we must inculcate Dr. Ambedkar's articulation of fraternity not only in our laws, but more importantly, in our society and psychology in particular, as the way forward—towards freedom, equality, and justice.

## Keywords

Justice, Constitution, democracy, constitutionalism, marginalized, oppression, denotified tribes, discrimination

## Background

This article is an edited version of the lecture delivered by Justice P.S. Narasimha (Judge, Supreme Court of India) on 6 September 2023 at the Community for the Eradication of Discrimination in Education and Employment (CEDE),<sup>1</sup> Vimukta Diwas Lecture.<sup>2</sup>

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<sup>1</sup>CEDE is a network of lawyers, law firms, judges, and other organisations and individuals, who are committed towards reforming the Indian legal profession. It was founded in April 2021 by Disha Wadekar (Lawyer, Supreme Court of India), Anurag Bhaskar (Assistant Professor, O.P. Jindal Global University, India), and Avinash Mathews (Lawyer, Supreme Court of India). Since its inception, CEDE has been organising several lectures on issues related to the marginalized communities.

<sup>2</sup>The Vimukta Diwas (or Liberation Day) is marked on 31 August each year on the occasion of the repeal of the Criminal Tribes Act, 1871 in 1952. The CTA criminalized several marginalized castes and indigenous communities.

## Introduction

I would like to thank the Community for the Eradication of Discrimination in Education and Employment, or CEDE in short, for inviting me.

I am delighted to deliver this lecture on the occasion of Vimukta Diwas. CEDE is a network of lawyers, law firms, judges, and other organizations and individuals, who are committed towards reforming the Indian legal profession.<sup>1</sup> CEDE works towards improving the representation of minorities like Dalits, Adivasis, Other Backward Classes, Nomadic and Denotified Tribes, transgender persons, persons with disabilities, and people from North East India within the legal profession and judiciary. I take today's lecture as an opportunity to further their conversation on justice for these communities, specifically in the context and in light of Vimukta Diwas, which is celebrated every year on 31 August.

This date marks the repeal of a colonial law called the Criminal Tribes Act. This law was enacted by the British in 1871, and it criminalized entire communities of people as being "criminal tribes". Every person who was born into these communities was branded as a criminal and subjected to police verification, arrest, and violence based on their birth. The Act continued to remain in force even after our independence in 1947 and the establishment of our constitutional republic in 1950. It was repealed only on 31 August 1952, when the so-called "criminal tribes" were de-notified. Vimukta Diwas is celebrated as a day of independence by people belonging to Denotified Tribes (Bajrange, Gandee & Gould 2019). In fact, it is for us to celebrate more than them.

In today's lecture, what I propose to do is to locate the history of unfreedom and inequality that these communities faced and discuss the path to justice for them through our constitutional democracy and values.

First, I will draw attention to the historical context of the oppressive law to throw light on how colonial logic worked with the existing caste structures in India to produce a unique form of legal and social disadvantages to these communities. Then, I will deal with how our constitutional promise of equality recognizes these historical wrongs and places responsibility on society and the State to correct them. Things do not stop here because mere constitutional declaration is not sufficient. Legal reform and the guarantee of fundamental rights do not mean that discrimination has come to an end. I will discuss the social and legal challenges that these communities continue to face even today. Lastly, and as a practical measure, I will propose that we must inculcate Dr. Ambedkar's articulation of fraternity not only in our laws, but more importantly, in our society and psychology in particular, as the way forward—towards freedom and equality.

## The Origins and Impact of Criminal Tribes Act 1871

Let us discuss the Act first. To fully understand the origin of the Criminal Tribes Act, we must note two things. *First*, criminal activity was seen as biological and habitual in nineteenth-century Britain. This meant that when a person committed crimes, it was

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attributed to him being born a criminal and being a criminal for his whole life. The imposition of this idea in the Indian context brings me to my *second* point, which is that the British understood India as a collection of castes, where each caste was seen as a homogenous unit committed to a hereditary occupation (Yang 1985).

These two assumptions of the British on criminality and the caste system underlay the Criminal Tribes Act. James Fitzjames Stephen, who is credited with introducing the Indian Penal Code (IPC) and Indian Evidence Act, reflected these assumptions when he introduced the Criminal Tribes Act, and I quote:

*...when we speak of 'professional criminals,' we...[mean] a tribe whose ancestors were criminals from time immemorial, who are themselves destined by the usages of caste to commit crime, and whose descendants will be offenders against the law, until the whole tribe is exterminated or accounted for in the manner of thugs. (Yang 1985)*

This is what his perception was. These words show a deep-rooted bias of British and Indian society in criminalising these communities. With the colonial project of codification and uniformisation of law, a pan-Indian juridical order was established that criminalised several tribal, nomadic, and lower caste communities by dubbing them to be 'criminal tribes' (Kamble, Kumar, and Chowdhury 2023). The people who were labelled as being "born a criminal" hence faced "*double discrimination*" as they were oppressed and ostracised within the social order of India's caste system and at the same time by the legal order introduced by the colonial masters.

Criminalisation was not sudden in the case of these communities. As we know, many of them also participated in the freedom movement. History therefore indicates that several indigenous communities had revolted against the colonial administration prior to the mutiny of 1857 (Minj & Soren 2021). Even in the mutiny of 1857, the British regime saw indigenous communities as the facilitators of goods and weapons. Consequently, they sought to maintain law and order through extreme measures such as the Criminal Tribes Act.

The Act contained provisions that empowered local governments to designate "any tribe, gang or class of persons" as a criminal tribe if they were "addicted to the systematic commission of non-bailable offences". The people of these communities were required to register themselves at local police stations and report their whereabouts on a daily basis (Bokil 2002). Any travel or change of residence required official permission. These communities faced not just discrimination, but also systemic control over their daily lives (Bokil 2002).

In 1897, the Act was amended to make the penalties even more severe (Report on the Criminal Classes in the Bombay Presidency 1908), because the freedom movement had intensified by that time. Children between the ages of 4 to 13 years could be separated from their parents and placed in so-called reformatory settlements (Reddy & Raju 1999) which often resemble prisons, with barbed wire compounds and restricted freedom (Glover 2005). These settlement camps were also sites of forced labor (Tucker 1923).

Another aspect of this Act that is less-studied is that it also criminalised the lives of *hijra* communities in the North-Western Provinces. Under Part II of the Act, the police would maintain a register of transgender persons who were suspected of kidnapping, castration, and sexual activity that was penalised under Section 377 of the IPC. The police were given powers of surveillance over the *hijra* persons who were prohibited from wearing female clothing or performing in public, and children were also taken away from their households. Part II of the Act characterised the entire community as criminal and deviant by virtue of their identity. This Part was repealed in 1911, which is why *hijra* communities are not considered Denotified Tribes. However, we must recognise the oppressive effect of this law on them and their persistent association with criminality under Police Acts, anti-beggary laws, and anti-sex work laws which is prevalent as of today (Hinchy 2019).

The Criminal Tribes Act was entirely repealed in 1952, marking a critical step towards acknowledging the injustice meted out to these communities. The Ayyangar Committee which was constituted to enquire into the law found that it violated various constitutional promises of equality, liberty, freedom, dignity, abolition of untouchability, and prohibition of forced labor. Based on these, the Committee recommended the repeal of the law (Criminal Tribes Enquiry Committee, 1949). In this way, the Constitution enabled recognition of historical wrongs and provided a language of rights to question the historical injustices.

## Correcting Historical Wrongs through the Constitution

What happens after the advent of the Constitution? The Constitution was formulated as a forward-looking societal blueprint, carving out significant provisions of fundamental rights. These rights uphold the essential principles of freedom and equality for citizens, and also dignity most importantly.

The drafters crafted an intricate framework that prioritizes the advancement of Scheduled Castes, Scheduled Tribes, and Other Backward Classes. The framework, reflected in various constitutional provisions, is a testament to our collective resolve to build an equitable and harmonious society.

The golden triangle of Articles 14, 19, and 21 embodies the values of equality, liberty, freedom, life, and dignity for all persons. In no unclear terms, these provisions guarantee equal rights to those belonging to marginalised communities. Within the equality provisions, one of the most profound declarations is Article 17, which unequivocally abolishes the practice of Untouchability. Article 46 serves as a beacon of hope, charging the State with the duty to provide special attention to the educational and economic advancement of these marginalised communities. This mandate is aimed at shielding them from the clutches of social injustices and exploitation that have hindered their progress for far too long. Article 15(2) of the Constitution embodies a fundamental principle of equality and non-discrimination. This provision ensures that no citizen is subjected to any form of discrimination based solely on factors such as religion, race, caste, sex, place of birth, or their intersections. Article 15(4) lays

down a clear roadmap for their progress by providing specific provisions for their advancement. Article 16(4) provides for affirmative action for marginalised social groups in public employment, and it is a facet of the Fundamental Rights chapter.

And then we have Article 23 and Article 24, addressing human trafficking, forced labor, and child labor, holding particular significance for Denotified Tribes. So these are articles not just given as a protection, but are intended to ensure direct benefits to the Denotified Tribes. They reiterate our commitment to safeguarding their rights and dignity.

We must be cautious however in not mistaking the guarantee of these rights as automatically translating to a change in the material conditions of society. These are constitutional declarations. It is the obligation of the constitutional authorities therefore to translate our constitutional promise to reality—whatever has been thought of, believed, and put forth in the Constitution.

In an unequal society, authorities are under an active obligation to prevent any form of discrimination and reduce inequalities. It cannot be an excuse for the authorities to say that society is unequal and that they are performing their role neutrally. Having read the constitutional mandate, I will now focus somewhat on those who are to implement the provisions of the Constitution. In an unequal world, staying neutral amounts to leaving the weaker and the oppressed in their situation. In that sense, authorities not performing their roles and responsibility amounts to perpetuation of these inequalities. It is only through the substantive efforts of our legislature, executive, and judiciary that the spirit of the Constitution is entrenched in our society. It is not merely the institutions that we are talking about; a reason why the final concluding speech of Dr. Ambedkar at the end of the Constituent Assembly Debates is significant to remember. I quote:

*However good a Constitution may be, it is sure to turn out bad because those who are called to work it, happen to be a bad lot. However bad a Constitution may be, it may turn out to be good if those who are called to work it, happen to be a good lot. (Constituent Assembly Debates 1949)*

So, therefore, a great amount of responsibility falls on those who occupy constitutional positions and positions thereafter in governance. However, does it really stop there? Is it merely those who are in a constitutional position and those who are in governance who must take responsibility? My speech today says that we must travel beyond that.

### *Constitutional Safeguards in the Context of Denotified Tribes*

Let me first deal with the constitutional safeguards for the Denotified Tribes.

Our law-makers and political leaders at the time of independence envisaged affirmative action and reservations as ‘compensatory discrimination’ essential to undo the historical wrongs faced by marginalized communities, to uplift them to an equal status as the majority. Social welfare also played a significant role in the development of these communities. The Ayyangar Committee that recommended the repeal of the law also placed responsibility on the central and state governments to provide welfare to the Denotified Tribes (Gandee 2020).

In terms of constitutional protections, however, the cause of the Denotified Tribes did not extensively feature in the deliberations and debates of the Constituent Assembly. The issue of oppression and violence faced by these communities was brought up largely in the context of Article 19(1)(d), which guarantees the right to freedom of movement. H.J. Khandekar, one of our constitutional fathers (Constituent Assembly member), was the only Assembly member who brought up this cause in the Assembly debates (Gandee 2020). He stated that a fundamental right to freedom of movement is necessary to fight against the restrictions placed on “criminal tribes” under the Act. So what we thought is a general right of Article 19(1), ensuring benefit to all, actually had direct impact that it will enure to the benefit of these communities who are otherwise restricted, as they were to report even after the repeal.

However, the caste-based disadvantages faced by these communities were not explicitly addressed in the discussions on equality provisions. These communities instead received the benefits of affirmative action by being included in the list of Scheduled Castes, Scheduled Tribes, and Other Backward Communities (Gandee 2020). So what then are the contemporary challenges that we are going to face? I have divided them into a few specific instances. One challenge is lack of consistency.

## **Contemporary Challenges**

### *Lack of Consistency*

While being included within the Scheduled Castes and Scheduled Tribes (SC/ST) list extends the benefit of equality provisions to these communities, the challenge of classification adds another layer of complexity to their struggle. Although some Denotified Tribes subgroups are included in lists of Scheduled Castes and Scheduled Tribes, the lack of uniformity across states creates inconsistency. This lack of consistency has led to anomalies where tribes are categorized differently in various regions. For instance, the ‘Phanse Pardhis’ are recognized as Scheduled Tribes in Maharashtra, while their counterparts, the Haran Shikaris and Gaon Pardhis, are designated as Vimukta Jatis and Nomadic Tribes (Bokil & Raghavan 2016). Such inconsistencies underscore the urgency to establish a coherent and uniform classification system that ensures equitable treatment across the nation. It also adds an enormous amount of litigation; maybe a time has come to answer this.

The lack of a uniform approach in their administrative classification also excludes them from using the framework of other beneficial legislation like the SC/ST Atrocities Act 1989 to report against acts of oppression. The absence of specific safeguards weakens their ability to combat human rights violations effectively (Jenkins 2006). The Bhiku Ramji Idate Report of the National Commission for Denotified Nomadic and Semi-Nomadic Tribes took note of this situation and recommended the separate and explicit inclusion of denotified and nomadic tribes in the SC/ST Act and within constitutional safeguards (Idate Commission Report 2017).

### *Disproportionate Criminalization*

Another challenge is disproportionate criminalisation. These legal protective measures are essential because the social stigma against these communities remains deeply ingrained despite the repeal of the Criminal Tribes Act. The criminal tag continues to haunt them, perpetuating a cycle of bias and discrimination. This social stigma has legal repercussions when we note that some criminal laws are still disproportionately used to target members of these communities. The Habitual Offenders Act was introduced in 1952 as a substitute to the Criminal Tribes Act. While many provisions regarding restriction of movement, registration of habitual offenders, and police surveillance continued, the key difference was that the Habitual Offenders Act did not associate criminality with certain communities but with individuals. However, the individuals who were labeled as habitual offenders largely hailed from Denotified Tribes. There is also a lack of a common definition of who is a habitual offender, and police manuals in certain states still define a habitual offender with reference to the caste of the person (Bokil & Sonavane 2020). The police continue to formally and informally administer the law with the assumption that members belonging to these communities are inherently criminal (Bajrange, Gandee & Gould 2019). Even other laws like the Wildlife Protection Act, Indian Forest Act, Prevention of Cruelty to Animals Act, excise laws, and anti-beggary laws are deployed in a discriminatory manner (Sonavane & Bokil 2020). These are practical problems.

### *Social Stigma in Education and Employment*

The third challenge is social stigma in education and employment. Beyond the laws, Denotified Tribes also face discrimination in education and employment. The Ayyangar Committee noted that employers refused to employ persons belonging to Denotified Tribes, as they perceived them to be of criminal nature (Report of the Criminal Tribes Act 1949-1950). The educational journey of Denotified Tribes is also fraught with pervasive discrimination. A report indicated that within the walls of educational institutions, students from Denotified Tribes often find themselves marginalized, considered to be backbenchers, and subjected to neglect from teachers (Hebsur 1981). Their peers further exacerbate their struggles by branding them as unintelligent, perpetuating stereotypes that hinder their academic progress. This critical issue underscores the imperative need for comprehensive sensitization programs among educators and students alike.

A crucial aspect is an examination of the educational status of the Denotified Tribes which shows that about 61 per cent of their members are illiterate (Korra 2017). The sad part of schooling is that there are numerous children from Denotified Tribes who drop out of schools and colleges every year (Korra 2017). A major factor for drop out is the absence of identity certificates which deprive the children of Denotified Tribes from getting scholarships, therefore, they do not get the encouragement needed to send their children to schools and colleges. While education holds the promise of transformation, barriers like social discrimination, poverty, and societal oppression impede their children's access to learning.

## Fraternity as the Way Forward

What is the way forward? We have seen the repeal of the Act, examined the constitutional promise, considered the new statutory scheme, and we have also observed the rules and regulations establishing and formulating the entire regime of laws and beneficial legislations. Yet, it has not fully worked. There is something more we need to do. It is not merely in the law, but a matter more fundamental which goes beyond the letter of the law. It lies in the attitude, belief, behavior, and habits. From the accounts, we observe that the problem is not only a legal one but more of a social and psychological one. It is therefore imperative for us to move beyond the realm of legal protections and rights in seeking to address the issues faced by marginalised communities. The constitutional authorities cannot work in isolation; citizens must play an important role in ending social discrimination and holding the State accountable to its promise of equality and upliftment. A higher obligation rests on those communities who reaped the largest benefit with no semblance of the trappings which marginalised communities have faced. So the biggest responsibility, at this time, is not on the obligation of the State, but is about the obligation of the general citizenry, specifically those who receive the best benefit all through, without any kind of hindrance.

Let us recall the words of Dr. Ambedkar, which is a little longer quote, but I think a very important one. It is in these words that he underlines the importance of social democracy as being necessary for achieving our constitutional vision. He said:

*We must make our political democracy a social democracy as well. Political democracy cannot last unless there lies at the base of it social democracy. What does social democracy mean? It means a way of life which recognizes liberty, equality and fraternity as the principles of life. These principles of liberty, equality and fraternity are not to be treated as separate items in a trinity. They form a union of trinity in the sense that to divorce one from the other is to defeat the very purpose of democracy. Liberty cannot be divorced from equality, equality cannot be divorced from liberty. Nor can liberty and equality be divorced from fraternity. Without equality, liberty would produce the supremacy of the few over the many. Equality without liberty would kill individual initiative. Without fraternity, liberty, equality could not become a natural course of things. It would require a constable to enforce them. (CAD 1949)*

Therefore, what he is talking about is the belief and the trust you have in this trinity, and have complete confidence, and live with the fraternity. He continued:

*We must begin by acknowledging the fact that there is a complete absence of two things in Indian Society. One of these is equality. On the social plane, we have in India a society based on the principle of graded inequality, which is elevation for some and degradation for others. On the economic plane, we have a society in which there are some who have immense wealth as against*



*many who live in abject poverty. On the 26th of January 1950, we are going to enter into a life of contradictions. In politics, we will have equality and in social and economic life we will have inequality. In politics, we will be recognizing the principle of one man one vote and one vote one value. In our social and economic life, we shall, by reason of our social and economic structure, continue to deny the principle of one man one value. (CAD 1949)*

We should test ourselves as to how far we have achieved and gained this situation of one citizen, one person, one value.

*How long shall we continue to live this life of contradictions? How long shall we continue to deny equality in our social and economic life? If we continue to deny it for long, we will do so only by putting our political democracy in peril. We must remove this contradiction at the earliest possible moment, or else those who suffer from inequality will blow up the structure of political democracy which the Assembly has [so] laboriously build up. (CAD 1949)*

In Dr. Ambedkar's articulation, fraternity is what enables the materialisation of a society of liberty and social and economic equality. It is only when fraternity becomes a way of life that the conflict of liberty and equality can be resolved as accommodation, inclusion, and cooperation with the needs of disadvantaged communities as socially valuable. Dr. Ambedkar understands fraternity as a "*sense of common brotherhood of all Indians- if Indians being one people. It is the principle which gives unity and solidarity to social life*" (CAD 1949). It is only through this *sentiment* of mutuality, unity, oneness, and brotherhood that our fundamental rights will be safeguarded. The sentiment emerges from your strong belief. Thus, unless we believe in that and move forward with that belief, the constitutional legal infrastructure, which is of course so necessary, will not attain its completion till the psychological intention marries and merges it together, and gives its total effect to what we believe.

But we must not mistake unity and solidarity to mean sameness or homogeneity. Our idea of fraternity must not be at the cost of diversity and acceptance of difference; rather, fraternity must be the foundation for equality of those who deviate or are different from the majority. Marginalised citizens must be united into the majority not through demands of assimilation into the mainstream but through access to institutional and structural remedies that redress the disadvantage suffered by them and allow them to maintain their difference, thereby fostering values of plurality and multiculturalism (Gupta 2007).

Such an understanding of fraternity must be socially and psychologically inculcated within our country. Dr. Ambedkar was not only influential in drafting the Fundamental Rights, but he also acknowledged that they must be protected by the social and moral conscience of society. If social conscience is such that it is prepared to recognise the rights which the law proposes to enact, rights will be safe and secure. But if the fundamental rights are opposed by the community, then no law, parliament

or judiciary can guarantee them in the real sense of the word (Moon 2020). Our social and psychological attitude must change from one of discrimination, stigma, and exclusion to equality and inclusion. This change is possible through the feeling of fraternity, which Dr. Ambedkar has also characterized as love. In a letter which he has written to Mr. A.V. Thakkar in 1932, he wrote:

*The touchables and the untouchables cannot be held together by law... The only thing that can hold them together is love. Outside the family, justice alone, in my opinion, can open the possibility of love, and it should be the duty of the Anti-Untouchability League to see that the touchable does, or failing that is made to do, justice to the Untouchable.* (Moon 2020)

The letter is eloquent. Drawing from this idea of fraternity, I propose that communities who have been oppressed need to be treated with a sense of institutional empathy. Where does the burden lie? It is with the institution-holders. It is their obligation to treat the marginalized communities with empathy, to take an extra mile, extra step. ‘Empathy’ by those in power should not turn into a ‘paternalistic’ or a ‘savior’ approach. That is to say, we must understand the issues and take into consideration the struggles of marginalized communities, rather than impose our own worldview. First, members of marginalized communities should not only be treated as someone who needs *saving*. We must treat them as equal citizens, who are conscious of what they need. Second, we must not stop at merely recognising the problem, and should take active steps to question even our own privileges, and to state poetically—make dignified room for those who were kept *out of houses*.

Within the legal profession itself, we have much work to do to ensure better access and representation of marginalized communities at par with everyone else. A Report by the American Bar Association highlights the barriers faced by individuals belonging to the Dalit community in entering the profession (ABA 2021). Such barriers are also faced by other minorities like women, persons with disabilities, Adivasis, OBCs, Denotified Tribes, and gender and sexual minorities. Therefore, in the legal fraternity, we must create spaces for students and professionals from marginalized communities. We must adopt steps to have adequate representation of marginalized communities in the Bar and the Bench. That is why at this stage I wish to congratulate the very imaginative way in which CEDE was constituted. These are the additional steps, those extra miles that need to be taken. What is needed is not merely providing the individual benefit, but rather institutioning the steps as CEDE was created. It is in that manner that we need to proceed with individual law firms, those who are in a startup phase, wherein a few extra steps must be taken.

It is my suggestion that every Senior Advocate should recruit and mentor at least one member from the marginalized communities in their chambers. However, I must add a caveat that such mentoring needs to be accompanied very, very importantly by dignity and patience. Patience is a very important word—as a routine or as an obligation that ‘yes, we need to do it’. Sometimes, people take a step and then forget

about it or do not remind oneself that somebody has been taken in. Therefore, for that little extra step to continue requires some amount of patience. That patience is again important, else it will have negative consequences. It should not be done only to resemble 'tokenism', but rather a humanist approach is needed. This practice can even be institutionalized through the regulations of the Bar Council of India. Till such practices are institutionalized, voluntary acts of inclusion by senior members of the Bar can lead to major change, as young professionals from marginalized communities whom we mentor today may become successful professionals of the future, who may even change the world. The Supreme Court of India has tried to do so by adopting a 'diversity' clause in the new scheme for recruiting law clerks.

We need to make efforts to make the legal profession inclusive. Statistics show that only 80 out of the total 4,434 candidates, who applied for the law clerks/research associate examination conducted recently in June 2023, were Scheduled Tribes; a number which is not even 2 per cent. This shows that even at the stage of application, we are not able to reach the Scheduled Tribes. This is a systemic problem. We must make active efforts to ensure that the law does not remain a profession of only certain communities, who have been historically dominant and power-controlling.

By taking *active efforts*, we will not only recognise the social problems, but also create structures of justice for the marginalized. Unequal access to resources and opportunities has kept these oppressed communities trapped in a cycle of marginalization and oppression that is difficult to break. It is important now, more than ever, to speak and more importantly *act* on issues that have contributed towards the alienation and oppression of historically marginalized communities.

After independence and the adoption of the Constitution, the marginalized communities in India chose to show faith in the constitutional framework, despite facing continuous challenges and discrimination. Only when those in power and also those who are not in power but are sufficiently endowed, make active efforts to remove barriers of injustice, can the marginalized communities retain their faith in the constitutional justice system.

It is with this commitment I thank CEDE, all the founders, members actively associated with CEDE, and team Live Law. I thank the audience, though it is online, for patiently listening to me and letting me share my thoughts, having spent so many years as a lawyer and also a few years as a judge.

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