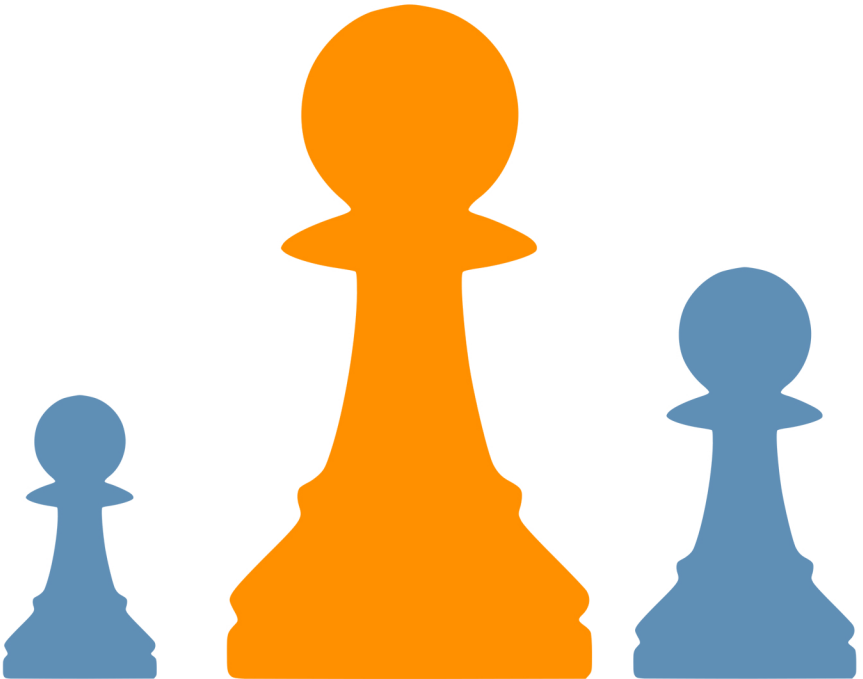




Religious Minorities In India Report



Documenting Socio-Political Status Of
Religious Minorities In India, 2021

Religious Minorities In India

Report

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Religious Minorities In India, 2021

November 2022



The Council on Minority Rights in India (CMRI) is a human rights organisation dedicated to protecting the freedom of all ethnic, linguistic, and religious minorities in India. A 501(c)(3) non-profit organisation, CMRI endeavours for Indian minority communities to lead prosperous, productive lives regardless of their religious, ethnic or societal affiliations.

We are committed to protecting all Indian minorities from oppression and prejudice. At its core, the foundation of CMRI's mission is to promote diversity and religious acceptance throughout India. CMRI believes that the acceptance of all faiths and ethnicities is directly linked to the success of India as a sovereign and democratic nation. More and more, minority communities in India have begun to fear for their safety and ability to be productive Indian citizens. By protecting the rights and dignity of minority groups, we aim to strengthen the common goal of building a thriving and prosperous India.

We strongly believe that the Constitution of India is the leading exemplar of tolerance and inclusivity and commit to ensure its core values are upheld across India.

Foreword

Post 2014 India has been defined by its descent into majoritarianism. A few things are important to note here. First, that this is not entirely new. It is not the case that before 2014 India was not inclined to go after its marginalised communities, and especially its religious minorities. The history of communal violence in India and the role of the state make it clear that there is continuity more than change.

The shift is particularly about the inclination of the State, meaning the apparatus of government. The ideology of the Bharatiya Janata Party, which is referred to as Hindutva, is defined by its targeting of minorities. This targeting has shown itself in law and policy and it has permeated through into society and media in a way which it had previously not. And in a way which will be difficult to eradicate or even counter without monumental effort.

To the outsider the facts are clear. India has chosen a path of exclusion and persecution. The exclusion is through the removal of Muslims from democratic politics. Where the tone and tenor of the Constitution and of political parties in general was inclusion. Of course, once again, this was not necessarily the practice, but the language was pluralist. This has ended under the BJP. The party in control of the government of India has deliberately chosen to not have any Muslim ministers, any Muslim MPs in either house as of July 2022 and no Muslim among its over 1000 MLAs across India. This has never before happened. Even if merely for the sake of tokenism there was representation given to communities in India and particularly, the largest religious minority. What it has resulted in is that a set of Muslims, numbering the same as the collective populations of Germany, France and the United Kingdom, is unrepresented in the Union government.

What is the purpose of this exclusion? There is no such theory in Hindutva. It is exclusion for the sake of it and there is no particular end, only more of

the same. The most popular political party in India says it wants no truck with Muslims. This is the political exclusion aspect of post 2014 India.

The second aspect is the persecution. This again has come in a fashion so naked so as to be immediately apparent. A series of laws targeting Muslims have come to India post 2014. In 2015, after being encouraged by the prime minister against what he called the ‘pink revolution’, two BJP states, Maharashtra and Haryana criminalised the possession of beef. In Gujarat, the punishment for cow slaughter, which is ostensibly an economic crime, now attracts life imprisonment. No white collar crime attracts the same punishment of course. The burden of proof has been reversed in these laws, and it is incumbent on the accused to prove innocence. The reason for this is to make bail difficult and convictions easy to secure and the overriding desire is to ensure that those accused, mostly Muslims, can be brutalised. In 2019, a Muslim man was accused of serving beef at his daughter’s wedding. The police could not prove that the meat that had been consumed weeks ago was beef. The court convicted him nonetheless saying that it was for him to prove that no crime had been committed. The High Court later suspended the sentence, using ‘judicial discretion’, but the law is clear: Muslims accused of beef possession are guilty until proven innocent, reversing the cornerstone of common law, the idea that the accused is assumed to be innocent and it is for the state to prove guilt.

Interfaith marriages between Hindus and Muslims were criminalised in BJP states beginning in 2020. Again the burden of proof was reversed. The testimony of an adult Indian woman that she converted of free volition is insufficient evidence for the state. It is for the man she is marrying and the family she is marrying into to prove that there was no ‘coercion’. This is to be proved to the collector or district magistrate. The state has the power to undo marriages, including those which have children.

In 2017, the Supreme Court invalidated the triple talaq offered in a single seating, meaning that if offered, it would not result in divorce and the marriage would remain intact. After this, for no apparent reason other than to harass, the BJP passed a law criminalising the uttering of these three words in a single seating (the regular talaq offered over three months remained valid). In effect what India has done is to criminalise a non-act. If a non-Muslim is accused of saying these words to his wife there is no divorce and there is no crime. If a Muslim is accused of saying them there

is also no divorce but it is a crime. The absurdity only barely hides the fact that the law was passed expressly to ensure that Muslim men were victimised.

India's Citizenship Amendment Act specifically targets Muslims in two ways. First it denies them the same rights as non-Muslims to seek asylum in India, a violation of Article 14. Secondly, it is to be read in conjunction, according to India's home minister, with the National Register of Citizens. The two pincers will extricate non-Muslims from the trap and leave Muslims to face nationwide what people in Assam have faced under the NRC.

The brave protest against the CAA, led by Muslims and especially Muslim women, has ensured that the government backed off from implementing the law on the ground but it remains on the books.

A law in Gujarat that effectively ghettoises Muslims was tightened further in 2019 to keep neighbourhoods segregated. A Muslim may not buy or lease property in Hindu neighbourhoods even if buyer and seller were willing and had arrived at a fair price. It was for the government to determine whether the sale could go through. Foreigners can buy and rent properties in Gujarat where Gujarati Muslims cannot.

Of Kashmir what else can be said than that it is the only part of South Asia not under democratic rule? The rest of it and what has been inflicted on them has been recorded fully elsewhere and need not detain us here, except for us to note that it is their faith that is the primary cause of their persecution.

The final aspect of the post 2014 majoritarianism of India is that it has been democratised. Mobs in the National Capital Region can veto the state. Muslim migrants from northern India into Delhi had no access to mosques for congregational prayer and had been given designated areas for this. Hindu mobs blocked the practice, showing up to harass them, and leading the state to undo the permission. Elsewhere, bans and boycotts on Muslim vendors and shopkeepers are now commonplace.

This democratisation has seeped through most dangerously into the media, as this work illustrates quite thoroughly. India's state apparatus no longer has the capacity to be able to internally resist the poison, even if it had the will, which of course it does not. For individuals and civil society, this is the time to step up. Democracy does not end and begin at the pollingsta-

tion. It is our right to engage with the state and what is happening around us. The natural trajectory of humans, in all nations around the world, has been in the direction of progress if we look at history through the 150 year lens rather than the 10 year one. Things will get better for all of us, but not on their own. We have to contribute if we want the process accelerated and not just improved through inertia.

The first step of this effort, to my mind the most important step, is documentation. That is what this fine effort seeks to do.

Aakar Patel
Chair, Amnesty International India

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Abbreviations

AAJMI	Alumni Association of Jamia Millia Islamia
ABVP	Akhil Bharatiya Vidyarthi Parishad
AIMIM	All India Majlis e Ittehadul Muslimeen
AISHE	All India Survey of Higher Education
AMU	Aligarh Muslim University
BJP	Bharatiya Janata Party
CAA	Citizenship Amendment Act
CAH	Citizens Against Hate
CBI	Central Bureau of Investigations
CERT IN	Computer Emergency Response Team (India)
CPI	Communist Party of India
CPIM	Communist Party of India
CPJ	Citizens for Peace and Justice
CRPF	Central Reserve Police Force
DOTO	Documentation of The Oppressed
EFLU	English and Foreign Languages University
FBI	Federal Bureau of Investigations
FCRA	Foreign Contribution Regulation Act
FIR	First Information Report
HJM	Hindu Jagran Manch
ICERD	International Convention on the Elimination of Religious Discrimination
IISER	Indian Institute of Science Education and Research
IIT	Indian Institute of Technology
IPC	Indian Penal Code
JMI	Jamia Millia Islamia
JNU	Jawaharlal Nehru University

MHA	Ministry of Home Affairs
MLA	Member of Legislative Assembly
MP	Member of Parliament
NCPCR	National Commission for Protection of Child Rights
NCRB	National Crime Records Bureau
NCW	National Commission of Women
NDA	National Democratic Alliance
NEP	New Education Policy
NGO	Non governmental Organisation
NHRC	National Human Rights Commission
NIA	National Investigation Agency
NIT	National Institute of Technology
NRC	National Register of Citizens
NSA	National Security Act
NSSO	National Sample Survey Office
OBC	Other Backward Castes
RAF	Rapid Action Force
RSS	Rashtriya Swayamsevak Sangh
SC	Scheduled Castes
ST	Scheduled Tribes
TOI	Times of India
TRAI	Telecom Regulatory Authority of India
TRP	Television Rating Point
UAH	United Against Hate
UAPA	Unlawful Activities Prevention Act
UCF	United Christian Forum
UK	United Kingdom
UNCAT	United Nations Convention Against Torture
UP	Uttar Pradesh
USA	United States of America
VHP	Vishwa Hindu Parishad

Introduction

The United States Commission on International Religious Freedom (USCIRF), an independent and bipartisan American government agency tasked with monitoring universal rights of religious freedom, has recommended for the third year in a row that India be designated as a "country of particular concern" for engaging in and tolerating systematic violations of religious freedom. India has joined countries such as China, Afghanistan, Burma, Syria, and North Korea on the list. USCIRF has emphasised in its annual report for 2022 that the Indian government has actively promoted and enforced policies – particularly those that support a Hindu nationalist agenda – that negatively affect Muslims, Christians, Sikhs, and other religious minorities.¹ In addition, the report comments that the Indian government has continued to systematise its ideological vision of a Hindu state at both the national and state levels through the deployment of both existing and new anti-religious minority laws and structural reforms which are hostile to the country's religious minorities.

Several independent observers, members of civil society and politicians have recently described India as an asymmetrically polarised country losing its democratic credentials in the wave of Hindu nationalism propagated and enforced by Prime Minister Narendra Modi-led Bharatiya Janata Party (BJP) and its parent organisation, the Rashtriya Swayamsevak Sangh (RSS). Rahul Gandhi, arguably India's tallest opposition leader, in 2021, commented that India is no longer a democracy.² While the official spokespersons of the government are denying the allegations and calling these descriptions – including the one by USCIRF – politically motivated;

1 2022 USCIRF ANNUAL REPORT. (2022). [uscifr.gov](https://www.uscifr.gov). Retrieved September 25, 2022, from https://www.uscifr.gov/sites/default/files/2022-04/2022%20USCIRF%20Annual%20Report_1.pdf

2 India is no longer a democratic country: Rahul Gandhi. (2021, March 11). Times of India. <https://timesofindia.indiatimes.com/india/india-is-no-longer-a-democratic-country-rahul-gandhi/articleshow/81449687.cms>

what is playing out in the country on a daily basis, makes the case for itself. An exponential rise in cases of hate crimes, structural demonising of minority communities by the mainstream media, and genocidal hate speeches by BJP lawmakers, vigilante groups, and police officials have only further established these claims.

The divulsion of India's popular image from the largest democracy of the world to, as a recent report states, the global exporter of Islamophobia, is a subject of study for many. For several decades, India has been popularised as a home to a plethora of distinct cultures, religions, languages and – most famous of all – the exporter of Gandhian philosophy of non-violence. This decline, thus, is contradictory to their own beliefs for many international observers of India. The researchers and observers of India, as Professor Paul Brass once said, must confront the paradoxes and contradictions of the competing imagery of violence and non-violence.

RSS, the competing ideology to the much-publicised Indian philosophy of non-violence, has been existing alongside since the late 1920's. This organisation, inspired by the nationalism propagated by Adolf Hitler in Germany and Benito Mussolini in Italy, brought their own version of Hindu Nationalism popularly known as Hindutva. The core philosophy of Hindutva is to manifest India into a Hindu nation or Rashtra wherein Muslim and Christian minorities are rendered stateless. The underlying idea of Hindutva is built upon caricaturing Muslims and Christians as invaders who have exploited India and its Hindus for centuries. Professor Rohit Chopra of Santa Clara University says Hindu nationalism can be identified as a violent right-wing majoritarian ideology that cynically speaks the language of minority victimhood.³

Over the past several decades and more directly through BJP, the RSS has successfully weaponised the religious Hindu identity against India's minorities. Alongside the growing calls of Hindu Rashtra, RSS's nationalism has deeply penetrated into the minds of people who are now openly expressing a majoritarian vision of India - one that excludes and wants to forcefully delete the presence of Muslims and other minorities in India.

3 Chopra, R. (2022, October 12). Online Hindutva as a global right-wing counterpublic. SSRN the Immanent Frame. Retrieved October 14, 2022, from <https://tif.ssrc.org/2022/10/12/online-hindutva-as-a-global-right-wing-counterpublic/>

Along with these developments, in 2019, the Supreme Court pronounced the Ayodhya Verdict, granting the land of the Babri Masjid, to a trust which is now building the Ram Temple.⁴ In December 2019, the Citizenship Amendment Act (CAA) was passed, which seeks to ‘protect’ minorities from Afghanistan, Bangladesh, and Pakistan. It mentions all religious categories except Muslims. Combined with the National Register of Citizens (NRC), and National Population Register (NPR), it seeks to delegitimize citizenship of Muslims in India.⁵ Several legislations, focusing on cow slaughter, anti-conversion, which are vaguely termed and do not specify any community - have been used to criminalise Muslims and Christians across the country. Amendments have been made to anti-terror legislations such as the Unlawful Activities (Prevention) Act, 1967 through which now individuals and dissenters are being termed, ‘terrorists.’⁶ Muslims who have dissented, have been wrongfully framed under security legislations, Christians who are merely practising their faith have been criminalised under conversion laws and the pattern only seems to be strengthening. The Sikh Community has a whole has faced criminalization as they registered their protest against the three undemocratic Farm Laws (which have now been repealed) and faced an extensive media trial terming members of the community as ‘terrorists’ and ‘Khalistani’ - these are just a few examples to portray that India and all its various bodies now stand at a position where an entire ecosystem has been created to vilify, and relentlessly persecute religious minorities. Another important development in the second term of the government, has been to publicly celebrate and welcome the perpetrators who have been accused of lynchings, rapes, and other hate crimes against religious minorities. This has been done specifically to terrorize the members of minority communities and should not be read in isolation. As Article14 Editor Samar Halarnkar has pointed out, Hindu-first policies, symbols and feelings are now predominant in politics, in media,

4 BBC (2019, November 9) Ayodhya Verdict: Indian Top Court Gives Holy Site to Hindus. Retrieved October 16, 2022 from: <https://www.bbc.com/news/world-asia-india-50355775>

5 Human Rights Watch (2020, Apr 9) “Shoot the Traitors” Discrimination Against Muslims Under India’s New Citizenship Policy. Retrieved October 16, 2022 from: <https://www.hrw.org/report/2020/04/09/shoot-traitors/discrimination-against-muslims-under-indias-new-citizenship-policy>

6 The Unlawful Activities (Prevention) Amendment Act. Retrieved October 16, 2022 from: <https://prsindia.org/billtrack/the-unlawful-activities-prevention-amendment-bill-2019>

among the judiciary and the police and in public life. Even the main opposition party, representing the secular vision of India, is giving a free pass to the BJP in making Hindu culture and symbols the only ‘normal’ in India.

The sudden rise in calls for genocides, economic and social boycotts, rape threats to Muslim women, rise in Hindu vigilante groups have resulted in lynching or lynchings of innocent Muslim men, vandalising Christian prayer meetings, and moral policing couples on Valentine’s day is nothing but a display of the growing extremism in the society.

It is becoming more and more dangerous to speak freely, think freely and even possess books which may give a message different to the one the current regime is propagating.

It is in this socio-political context that this report attempts to document the violence and provide perspectives to the growing intolerance. The report is divided into two parts; Part A and Part B.

Part A of the report includes three chapters and is based on primary data collected and analysed by the researchers. The chapters are focusing on (a) picturisation of religious minorities in popular channels, (b) documentation and analysis of hate crimes, and (c) patterns of representation of religious minorities in news media.

Part B of the report includes five chapters which are based on secondary data, personal experiences and are weaving important narratives from the last year. The chapters are focusing on (a) the ways in which Christian institutions are being repeatedly targeted by Hindutva groups in India (b) the experience of being Muslim in Indian Universities (c) the persecution of the Sikh Community (d) the patterns of online and offline violence against Muslim Women (e) the nature of hate speech and its aftermath.

Both parts of the report have concentrated on the year 2021 to provide a comprehensive review of the status of minorities in India for the particular year. However, important references within the chapters have been made from years other than 2021 for strengthening arguments and for providing a nuanced context.

The archiving and documentation work carried out by websites such as Documentation of the Oppressed (DOTO) Database, Watch the State

(WTS), Hindutva Watch, and Maktoob Media have been used through and through the report to corroborate the analysis.

Apart from everything else, this report is a manifestation of an innocent idea of the oppressed charting their own persecution and lived experiences. The initial idea of this report was to prepare a document charting out the persecution of the Muslim minority in the year 2021, but as some of us started researching and carrying out field travels, we realized the interlinked realities and the shared experiences of oppression with the Sikh and Christian minority of India – both in terms of the policies by the state, public rhetoric used to systemically otherise the three communities by politicians and actions taken by non-state actors.

Members of the research team predominantly constitute first-generation university learners and all the contributors to this report have lived experiences of the themes that have been addressed. Due to these experiences, it was collectively decided that the report will include a chapter which will discuss Islamophobia and mental health, but that could not be materialised due to some unfortunate developments over time.

The researchers working on documenting the incidents of hate speeches, unlawful laws, physical violence and mental trauma it causes were more often than not finding themselves in the position of writing about their own families, friends, schoolmates, city and community. In the process, the researchers were challenged with trauma and anxiety. Through that approach, this report places itself in the middle of the conflict it discusses. Hence, it is imperative that this report is an important endeavour and initiative for the researchers.

Finally, it must be addressed that the findings of this report are not in any way exhaustive of the developments and decline in the status of the membership of Muslim, Sikh and Christian communities in the Indian society. This is purely an attempt to fill the gaps in the conversations circling the communities, and we take complete responsibility for the inaccuracies and flaws, if any. As young individuals who wish to dream and live freely in our country, we draw hope from the words of political activist and thinker, Angela Davis, “You have to act as if it were possible to radically transform the world. And you have to do it all the time.”

Part A: Documentation

Hate Crimes; Case of Religious Minorities in India

Afreen Fatima

'In any country the faith and the confidence of the minorities in the impartial and even functioning of the state is the acid test of being a civilised state'.

-Justice Rajinder Sachar

Crime and violence driven by sectarian motives lurk in the hallways of the world's most populous democracy. The Indian sub-continent is witnessing an unprecedented rise in hate crimes which are carried out in myriad ways, while only a few are recognized as hate crimes. The ways in which crimes motivated by bias or prejudice against religious minorities are executed, the right to equal citizenship and realisation of a dignified living for religious minorities in India is continuously under threat.

Hate crimes are acts that are criminal offences and are motivated by a bias against the victim's group identity or their perceived group identity. In India, hate crimes are carried out by members of well-coordinated vigilante groups and at times, by individuals, and police officials. The members of these vigilante groups are trained to use swords, rifles and sticks. Journalist Mohammad Ali notes, "The camps that teach such skills are illegal, but the Bajrang Dal – the militant wing of the Rashtriya Swayamsevak Sangh (RSS) trains thousands of youngsters in them each year across the country." In the summer of 2015, 22-year-old Vivek Premi, the district convener of the Bajrang Dal – the militia wing of the RSS, paraded a Muslim man in the streets of Shamli – a town in Muzaffarnagar district of UP, after blackening his face. He and his supporters took turns brutally hitting the man with their belts and sticks while the entire ordeal was recorded on several mobile phones. Soon, the video was shared across social media platforms and WhatsApp groups administered by Hindu militant leaders. In the coming week, Premi was arrested under the National Security Act (NSA). The district administration that had invoked the NSA alleged that his actions led to communal tensions in the city. However, by January 2016, the BJP-led central government decided to revoke the NSA paving way for his release.¹

Fact as it is, both Premi's Bajrang Dal² and Prime Minister Narendra Mo-

1 Sahu, M. (2016, January 7). Bajrang Dal leader Vivek Premi, who beat up & paraded Muslim, is out of NSA net. The Indian Express. <https://indianexpress.com/article/india/india-news-india/bajrang-dal-leader-vivek-premi-who-beat-up-paraded-muslim-is-out-of-nsa-net/>

2 Bajrang Dal is a Hindu nationalist militant organisation founded in October, 1984 as the youth wing of Vishwa Hindu Parishad (VHP). Bajrang Dal played a key role in the demolition of Babri Masjid in Ayodhya in December, 1992 and was banned for its involvement by the PV Narsimha Rao-led government. The ban, however, was revoked

di's Bharatiya Janata Party (BJP) share the same parent organisation, the RSS. Premi was released and received by a huge crowd at the gate of Muzaffarnagar district jail. The crowds chanted, "Dekho dekho kaun aaya, Hinduon ka sher aaya" (Look, Look who is here! It is the lion of the Hindus!), and hoisted him up on his shoulders, showering flower petals on him. Attacks such as these range from vandalism to lynching, from verbal to physical, from heckling to life-threatening physical assault, and in the last few years- there has been a blurring of violence between online and offline. Hate crimes in India manifest from an institutionalised and systemic pattern with the constant and planned occurrence and recurrence. The explanation provided in this chapter will attempt to comprehend the situation of hate crimes against religious minorities through a discursive framework of defining and analysing incidents of hate crimes in the year 2021.

The first thing to understand before discussing the far-reaching patterns of hate crimes against religious minorities in India is that these are not sporadic instances of violence but part of a wider communal hate wave, where many institutional stakeholders come at play for such acts to happen and persist, without any redressal frameworks available to cease or monitor hate crimes, neither are there adequate legal provisions which address access to justice for the victims and survivors, or provide compensation and justice in a speedy manner.

There are no available official records of hate crimes in the country. However, media reports that keep a track of such crimes, indicate an increase in crimes motivated by hostility and bias against marginalised communities, especially religious minorities. The National Crime Records Bureau (NCRB) of India is the federal organisation that tracks all crimes across the country. However, it does not specifically record hate crimes because there are no special laws to deal with hate crimes per se. After 2017, NCRB stopped keeping a record of hate crimes such as lynching, cow vigilantism, and mob violence. The Ministry of Home Affairs (MHA) claimed in the lower house of the parliament that the data collection was stopped because the NCRB data was "unreliable" because the said crimes have not been "defined."³

after one year.

3 Bhardwaj, A. (2021, December 21). NCRB stopped collecting data on lynching, hate

Hate crimes against religious minorities are not a new phenomenon and are also not limited to the rule of the right-wing BJP. Irrespective of the political party in power, hate crime offenders flourish and their crimes continue to go unchecked. Though, there is a significant spike in hate crimes with the populist BJP winning a landslide victory in the Indian parliament in 2014. The dominant presence of the right-wing party in the centre and the Indian political arena, has emboldened right-wing outfits to carry out crimes against minorities with impunity and no consequences. The mainstreaming of the right-wing has opened the Pandora box of structural and innate problems of the Indian state and society, in relation to the persistent persecution of minorities.

This chapter will chart out occurrences of hate crimes and their patterns in India. This chapter is also people's documentation against propaganda, fake-truths, and against the erasure of history and memory.

Defining Hate Crimes

Crimes committed with prejudice based on the perceived race, caste, religion, ethnicity, disability, sexual orientation, or gender identity against an individual or a community, are defined as hate crimes. They involve harassment and violence against an individual or a particular social group disturbing the social harmony while inducing a sense of inferiority in the victim based on their group identity. At times, these crimes are carried out by the perpetrator due to the perceived group identity of the victim. Hate crimes manifest not out of enmity towards the victim as an individual but out of a larger societal hostility towards the social group to which the victim belongs to. They are carried out to send a larger message to the social group and create a chilling effect on the minds of the individuals.

There is no legal definition of a hate crime in India. The Federal Bureau of Investigation (FBI) defines a hate crime as “a criminal offense against a person or property motivated in whole or in part by an offender's bias against a race, religion, disability, sexual orientation, ethnicity, gender, or gender identity.”⁴

crime as it was 'unreliable', govt tells LS. ThePrint. <https://theprint.in/india/governance/ncrb-stopped-collecting-data-on-lynching-hate-crime-as-it-was-unreliable-govt-tells-ls/785201/>

4 Hate Crimes - FBI. (n.d.). FBI. <https://www.fbi.gov/investigate/civil-rights/>

For an act to be identified as a hate crime, it is essential that the act must have been motivated by hate against the perceived identity of the victim and the act must be a criminal offence. Fundamentally, the component of hate and that of crime need to be simultaneously present in the same act.

The hate component of a hate crime does not essentially require pure hate against the victim. It can be a motivated bias, prejudice, hostility, or antipathy towards the victim because of her/his group identity or perceived characteristics that identify group affiliation. The targeted crime is not specifically committed against the victim because of who they are but because they exhibit an identity that confirms their association with a larger group identity.

Bias Motivation

The motivation factors of hate resulting from criminal behaviour must be addressed because there can be a lot of ambiguity as to what actually qualifies as “hate.”

Additionally, bias or prejudice against the victim’s group identity does not have to be the sole motivator of the criminal offence. It is noted that an offence may be “motivated in whole or in part by an offender’s bias” as defined by the FBI. A criminal offence will still account for a hate crime as long as it is at least partially motivated by bias or prejudice.

Additional factors leading to hate crimes are identified by a few scholars. Some of these additional motivations of hate crimes are but are not limited to these, for the thrill, or excitement factor, in defence of one’s turf, in retaliation to a previous hate crime, and as a mission to eliminate certain groups.⁵

Mechanics of Hate in India

In India, bias-motivated crimes or hate crimes are not a new phenomenon, their inception cannot be pinpointed, and the roots of this can be traced to India’s Brahminical society. Through the same, caste-based and gen-

hate-crimes#Definition

5 Levin, J., & MacDevitt, J. (2013). Hate crimes: The rising tide of bigotry and bloodshed. Springer.; McDevitt, J., Levin, J., & Bennett, S. (2002). Hate crime offenders: An expanded typology. *Journal of Social Issues*, 58(2), 303–317.

dered violence has been ever present in the country.⁶ The birth of India as a nation-state oversaw mass violence motivated by hate against the group identity of people based majorly on their religion.⁷

The Ministry of Welfare, Government of India notified five religious communities, the Muslims, Christians, Sikhs, Buddhists, and Zoroastrians (Parsis), as minority communities on 23rd October 1993. The Jains were later notified on 27th January 2014, as a minority community. As per the 2011 census, the above-mentioned six religious minorities constitute 19.4% of the total population.⁸ Religious minorities in India are majorly found to be at the receiving end of this bias. Though considerable in numbers, minorities in India, are unable to compete with the dominant identity of the majority making them and their presence an easy target to be singled out.

Hate crimes against religious minorities are fuelled not just by the bias of an offender against the victim but often are a result of hate harboured within the majority community against that of the minority. This has been slowly fed into Indian society via the continuous creation of a 'threat' of the minority, and subsequent othering and vilification of the same. Hate crimes against minorities have seen a dramatic rise with the win of the Hindu nationalist right-wing party, Bharatiya Janata Party. This emotion of hate against minorities has been fostered by the propagation of Hindu nationalism, and the construct that India is essentially a Hindu nation and rightfully belongs to Hindus, and other religions such as Islam and Christianity are non-Indic, hence, not the rightful citizens of the land. These biases lead to individual acts of hate crime or violence or even mass violence perpetrated against a victim community.

Hate crimes are a manifestation of the larger biases manufactured and present in Indian society. Propaganda and emotionality are the drivers of

6 Nathan, V. A. R., & Thorat, V. (2020, October 3). Atrocities against Dalit Girls and Women in UP. *Economic and Political Weekly* | <https://www.epw.in/journal/2020/40/letters/atrocities-against-dalit-girls-and-women.html>

7 Engineer, A. A. (2004). *Communal Riots After Independence: A Comprehensive Account*. Shipra.

8 Government of India Ministry of Minority Affairs Frequently Asked Questions (FAQs) in respect of Multi-sectoral Development Prog. (n.d.). Ministry of Minority Affairs. <https://www.minorityaffairs.gov.in/sites/default/files/MsDP%20%28FAQs%29.pdf>

actions in the ‘post-truth era’ in this nation.⁹ The right-wing ecosystem in India represents a weaponisation of emotions and information to manipulate India’s entire political and societal landscape.

The fake news problem concerns the economics of emotion. Particularly, how sentiments are leveraged online to generate attention and viewing time, which converts to advertising revenue.¹⁰ Fake news is one element of the wider online disinformation ecology. What is also important to interrogate is the politics of emotion – a core driver of political propaganda online. Social media platforms give a space for the creation and propagation of emotionalized content that is termed “outrage discourse” which mainly is to provoke a visceral response, usually in the form of anger, fear or moral righteousness. There have been several investigative reports suggesting a direct role of social media portals like Facebook that have enabled hate speeches and violent sentiments against marginalised communities in India.¹¹ These emotionalized online discourses have proved important because they provide fertile ground for the rise of targeted media content and news contexts that bring out affective reactions. There are ample examples of targeted prime-time debates that create a threat out of minorities, furthering the politics of hate and otherization by showcasing sensational headlines and deliberately invoking emotional outrage against the signs, symbols and practices of the minority communities while at the same time Hindu majority is portrayed as a victim community.

Another problem in cases of hate crimes, is that of state complicity, and the impunity enjoyed by state and non-state actors who are repeated hate offenders in some cases.¹² The defining factor of hate crime in India has to include the impunity that is sanctioned to the offenders. To have a deeper analysis of the persistence of hate crimes in India, it is imperative to connect the dots to the involvement of state institutions in the power structure

9 Ahmed, S. (2013). *The cultural politics of emotion*. Routledge.

10 Bakir, V., & McStay, A. (2018). Fake news and the economy of emotions: Problems, causes, solutions. *Digital journalism*, 6(2), 154-175.

11 Purnell, N., & Horwitz, J. (2021, October 23). Facebook Services Are Used to Spread Religious Hatred in India, Internal Documents Show. *Wall Street Journal*. <https://www.wsj.com/articles/facebook-services-are-used-to-spread-religious-hatred-in-india-internal-documents-show-11635016354>

12 Yadav, A. (2016). *On Their Watch: Mass Violence and State Apathy in India* by Surabhi Chopra and Prita Jha, eds.

created. Impunity, to commit heinous crimes under the garb of nationalism, is strengthened with the direct or indirect involvement of institutions of state and their absent response to efficiently and effectively curb hate crimes.

Hate crimes can occur anywhere, they could be random or organised, spontaneous or premeditated, direct or indirect. It is important to note that even the most spontaneous indirect act of hate crime is also part of a structured ecosystem that thrives on hate crimes against religious minorities. There are ample examples of offenders who are termed lone-wolf attackers being felicitated by BJP politicians¹³ and other right-wing leaders; some are also later found to be members of different right-wing outfits.¹⁴ With accumulated power and control in the form of a right-wing majority in the parliament, this, in turn, furthers a sense of impunity. When contextualising the biased motivating factors in an Indian context, the structural inequalities that persist in Indian society have to be taken into account. These structural inequalities are rooted in a hegemonic majority-minority relationship. There is a pattern in the playing out of bias, where members of the majority religious group harbour an ill feeling against the members of minority religions. Fear or threat from minorities is spread and broadcasted by right-wing outfits, through targeted campaigns, political mobilisation and media (news, entertainment, and social).¹⁵

Hate Crime Legislation and Jurisprudence in India

Democracies such as the United States of America (USA) and the United Kingdom (UK) have legislations such as Matthew Shepard and James Byrd Jr. Hate Crimes Prevention Act in the USA and Crime and Disorder Act 1998 in the UK, that make hate crimes punishable offences and offer diverse provisions for redressal of hate crimes, they categorise the rubrics

13 India Today Web Desk. (2018, July 6). Union minister Jayant Sinha garlands 8 convicted for Ramgarh mob lynching. India Today. <https://www.indiatoday.in/india/story/union-minister-jayant-sinha-garlands-8-convicted-for-ramgarh-mob-lynching-1279601-2018-07-06>

14 Jha, D. K. (2022, March 1). The Haridwar dharma sansad is a reflection of the RSS's new strategy with sadhus. Caravan Magazine. <https://caravanmagazine.in/commentary/haridwar-dharma-sansad-vhp-rss-hate-speech>

15 Trivedi, D. (2022, March 11). Victimising women: How the right wing attacks Muslim women. Frontline. <https://frontline.thehindu.com/cover-story/victimising-women-how-the-right-wing-attacks-muslim-women/article38431009.ece>

of hate crimes based on its nature and intensity. These states publish regular reports on the situation of hate crimes and have official data-collection provisions as well.

In contrast, India has no such legislation that addresses prejudice motivated crimes or hate crimes. The cases filed against hate crime offenders are usually under relevant sections of the Indian Penal Code (IPC), however, they are hardly filed, as the police officials are not cooperative because of the nexus of the impunity in the country against minority communities. Whenever the First Information Report (FIR) is filed, due process is not carried out in the majority of the cases, and the offenders are free, and in some cases also enjoy support from society. They even end up contesting elections in the country.

India is one of the signatories of the International Convention on the Elimination of Racial Discrimination (ICERD) but has failed to submit a periodic report since 2010.¹⁶ India is also a signatory of the UN Convention on Civil and Political Rights (UNCAT) but has not ratified it.¹⁷

The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities Act), 1989, which is poorly implemented across the nation, is the only hate crime legislation in the Indian Penal Code, 1860 (IPC).¹⁸

Increasing incidents of mob violence and vigilantism expose the limitations and to an extent the failure of the criminal justice system in India. There is a failure on part of the police, as a law enforcement agency, to restrain hate crimes, because of no legal definition of hate crime and legal provisions to punish offenders.

The Tehseen S. Poonawalla order foregrounded, in a limited sense, legal precedence against mob lynching. The court noted that “no individual in his own capacity or as a part of the group can take law into his or their

16 UN Committee on the Elimination of Racial Discrimination. (n.d.). UN Committee on the Elimination of Racial Discrimination (CERD). Refworld. <https://www.refworld.org/cgi-bin/texis/vtx/rwmain?page=publisher&skip=0&publisher=CERD>

17 Kadam, S. (2021, July 23). Why has India still not ratified UN Convention against torture? | CJP. Citizens for Justice and Peace. <https://cjp.org.in/why-has-india-still-not-ratified-un-convention-against-torture/>

18 Ministry of Tribal Affairs - Government of India. Ministry of Tribal Affairs Government of India. (n.d.). <https://tribal.nic.in/actRules/preventionofAtrocities.pdf>

hands and deal with a person treating him as guilty.”¹⁹ The Supreme Court of India, also noted that mob justice in any form is inconceivable in a civilised society. It laid down a comprehensive guideline for the central and state governments, and the police, to prevent, and punish mob lynch-ers. Even so, the court refused to comment on the constitutionality of the cow protection laws which are used to protect cow vigilantes from their illegal acts. There is ambiguity in the order as it fails to take into account systemic biases and social hierarchies manifested in mob lynching. It also fails to capture inequalities and prejudices present in political and social processes.

Anti-lynching laws were framed and passed in four state legislative assemblies keeping in view the rising cases of mob lynching in India. The Legislative Assembly of Manipur passed ‘The Manipur Protection from Mob Violence Bill’ in 2018.²⁰ In August 2019, West Bengal assembly passed a legislation ‘The West Bengal (Prevention of Lynching) Bill, 2019’.²¹ Similarly, in December 2021, Rajasthan state assembly passed ‘Protection from Lynching Bill, 2019’.²² ‘Prevention of Mob Violence and Mob Lynching Bill, 2021’ was passed by the Jharkhand assembly.²³ The bills defined the act of mob violence and mob lynching, prescribed punitive measures to punish the act and offenders of mob violence and lynching, and also prescribed redressal and compensatory measures for the victims. However, the bills have not been implemented. The Ministry of Home Affairs informed the parliament that the incidents of lynching could be dealt with under Sections 300 and 302 of the IPC since the IPC does not define

19 Advocatekhaj.com. (n.d.). Tehseen S. Poonawalla vs. Union of India: Latest Supreme Court Judgments: Law Library. AdvocateKhoj. <https://www.advocatekhaj.com/library/judgments/announcement.php?WID=10275>

20 Government of Manipur Secretariat: Law & Legislative Department. (2016, May). The Manipur Protection from Mob Violence Ordinance, 2018. Manipur.gov. <https://manipur.gov.in/wp-content/uploads/2016/05/mobviolence.pdf>

21 Authority. (2019, August 26). 1Knkta. PRS India. https://prsindia.org/files/bills_acts/bills_states/west-bengal/2019/Bill%2021%20of%202019%20WB.pdf

22 Mathur, P. K. (2019). Bill No. 22 of 2019 (Authorised English Translation) The Rajasthan Protection From Lynching Bill, 2019. PRS India. https://prsindia.org/files/bills_acts/bills_states/rajasthan/2019/Bill%2022%20of%202019%20RJ.pdf

23 PTI. (2021, December 22). Jharkhand passes Bill to prevent mob violence, lynching. The Indian Express. <https://indianexpress.com/article/india/jharkhand-assembly-anti-lynching-bill-7684237/>

lynching as a crime. The above-mentioned states are waiting for the governor of the states to approve the laws for the official notification of the laws.

As noted earlier, Hate crimes are motivated and prejudiced against a community group, if the racially or communally motivated crimes are dealt with the same way as other crimes it will lead to a mismanagement of the crime. Hate crime offenders would enjoy lesser impunity if hate crimes are legally recognised and punitive measures are prescribed.

Existing Criminal Offences For Hate Crimes In India

India deals with hate crimes through the provisions mentioned under the Indian Penal Code (IPC), 1860, as it does not recognise hate crimes as a separate class of crime. Sections in IPC that can be directly linked to a few forms of hate crime are sections 153, 153A, 295, 295A, and 298.

Section 153: Wantonly giving provocation with intent to cause a riot—if rioting be committed—if not committed.²⁴

Section 153A: Promoting enmity between different groups on grounds of religion, race, place of birth, residence, language, etc., and doing acts prejudicial to the maintenance of harmony.

Section 153B: Imputations, assertions prejudicial to national integration.

Section 295: Injuring or defiling place of worship, with intent to insult the religion of any class.²⁵

Section 295A: Deliberate and malicious acts intended to outrage the religious feelings of any class by insulting its religion or religious beliefs.

Section 298: Uttering words, etc., with deliberate intent to wound religious feelings.²⁶

24 Devgan, R. (2018, August 15). IPC Section 153 - Wantonly giving provocation with intent to cause riot. Devgan.in. <https://devgan.in/ipc/index.php?q=153&a=1>

25 Devgan, R. (n.d.). IPC Section 295 - Injuring or defiling place of worship, with intent to insult the religion of any class. Devgan.in. <http://devgan.in/ipc/index.php?q=295&a=1>

26 Devgan, R. (n.d.). IPC Section 298 - Uttering words, etc., with deliberate intent to wound religious feelings. Devgan.in. <http://devgan.in/ipc/index.php?q=298&a=1>

Sections 153A, 153B, 295, 295A, 298, and 505 deal with hate speech and provisions for its occurrence. Chapter XV deals with offences related to religion but sections 295 and 298 of the chapter can be considered as legislation to regulate hate crimes.

There are no provisions under the IPC that deal with mob lynching but are provisionally regulated through traditional counterparts mentioned in the IPC such as sections 299, 300, 304, 307, 308, 323, and 325, that come under chapter XVI of the IPC. The overriding problem with the current dealing of issues of mob lynching is the absence of the element of hate where people take extrajudicial measures in pursuing a motive of hate against the victim's identity.²⁷

IPC deals with crimes committed against women in sections 354, 354A, 354B, 354C, 354D, 375 and 376.

The regulation of hate speech has been seen as a knotty problem as the issue intertwines with the right to freedom of speech under Article 19(1)(a) of the Constitution of India. While the constitution itself limits the right as not absolute and subject to restrictions under Article 19(2) of the Constitution of India. Hate speech regulation can be murky as the restriction on freedom of speech and expression cannot be arbitrary or excessive, reasonable accommodations need to be made.²⁸ In the context of hate speech laws, the case of 'Ramji Lal Modi vs. the State of UP'²⁹ is noteworthy because it has been used several times to uphold provisions of sections 153A and 295A of the IPC.

Methodology

In this chapter, a database of hate crimes committed against religious minorities in India has been compiled, as mentioned in Annexure 01. The primary data has been sourced from a dedicated online portal, DOTO (Documentation of The Oppressed) Database which does large-scale

27 Jha, R. S., Jain, V., & Chawla, C. (2019). Hate Speech & Mob Lynching: A Study Of Its Relations, Impacts & Regulating Laws.

28 Shreya Singhal v. Union of India - Global Freedom of Expression. (n.d.). Global Freedom of Expression | <https://globalfreedomofexpression.columbia.edu/cases/shreya-singhal-v-union-of-india/>

29 Section 295 A of Indian Penal Code. (n.d.). Indian Law Watch. <https://indianlaw-watch.com/section-295-a-of-indian-penal-code/>

documentation of hate crimes based on religious identity. DOTO only documents instances of harassment and violence against minorities (the Muslims, Christians, Sikhs, Buddhists and Zoroastrians) in India.³⁰ Data has also been sourced from the Hindutva Watch archive³¹ and Twitter profile incidents of hate crime and human rights violations and from the Twitter archives of The Polis Project's Watch the State (WTS) where³² in they tweet and archive incidents of hate crime and human rights violations via a dedicated Twitter handle. Since NCRB does not publish any official statistics concerning the occurrence of hate crimes, this secondary data from human rights organisations and documentation centres is the closest number that can arrive at an estimation for the number of hate crime occurrences in India.

Apart from the above-mentioned non-state actors, this database is sourced from verified media reports both in print media and online news portals, and fact-finding reports on violence and hate crimes in the year 2021 by various civil society organisations.

Limitations

The absence of a legal framework that specifies crimes and compartmentalises violence committed against religious minorities with a biased motive into hate crime, paves the way for under-reporting of crimes committed and makes the numbers of hate crime incidents much less credible.

Hate crimes in India are widely under-reported at the administrative level (legal complaint, FIR, etc.) as well as the public level. Only the most gruesome instances of hate-driven violence receive media attention; it makes the data only representative of the scale of violence and not satisfactory data. The actual figure of incidents and cases of hate crimes is estimated to be more than what has been documented.

Most of the data collected for the year 2021 used in this report are through secondary sources, the data is not collected from the ground.

30 DOTO - Documentation Of The Oppressed. (n.d.). DOTO - Documentation Of The Oppressed. <https://dotodatabase.com/>

31 Archives. (n.d.). Hindutva Watch. <https://hindutvawatch.org/archives/>

32 Watch the State [@watchthestate]. (n.d.). Tweets [Twitter profile]. <https://twitter.com/watchthestate>

Overview of Hate Crimes in the year 2021

This annual report of Hate Crimes against religious minorities (Christians, Muslims, and Sikhs) in India attempts to document and take stock of the hate crimes situation in India. The period covered is from 01.01.2021 - 31.12.2021. We have documented and classified these cases of hate crimes to illustrate the rampant and systemic nature of violence directed at minorities in India.

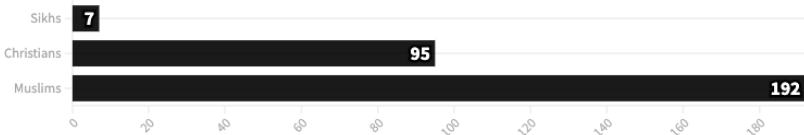
In 2021, a total of 294 incidents of hate crimes against religious minorities are documented in this chapter:

Name of Affected Community	Number of Hate Crimes
Muslims	192
Christians	95
Sikhs	07

Using the available data, it is observed that incidents of hate crime have occurred more frequently in particular states as opposed to the rest. Though the number of incidents and timing of biased offences change from region to region, it is still realised that India as a whole country is prone to hate crimes and offences.

The Christian community was predominantly targeted on allegations of forceful conversion. The Muslim community was chiefly targeted on allegations of inter-faith relationships and cow slaughter. The perpetrators are majorly right-wing vigilantes or Hindu extremist groups. There is a clear pattern which suggests that incidents of hate crime against religious minorities have occurred largely in BJP-ruled states.

There were seven instances of hate crime against members of the Sikh community that have been documented/recorded in the year 2021. Hate crimes against Sikhs are not documented at all and are not reported by news media as well. During our primary research for cases of hate crimes

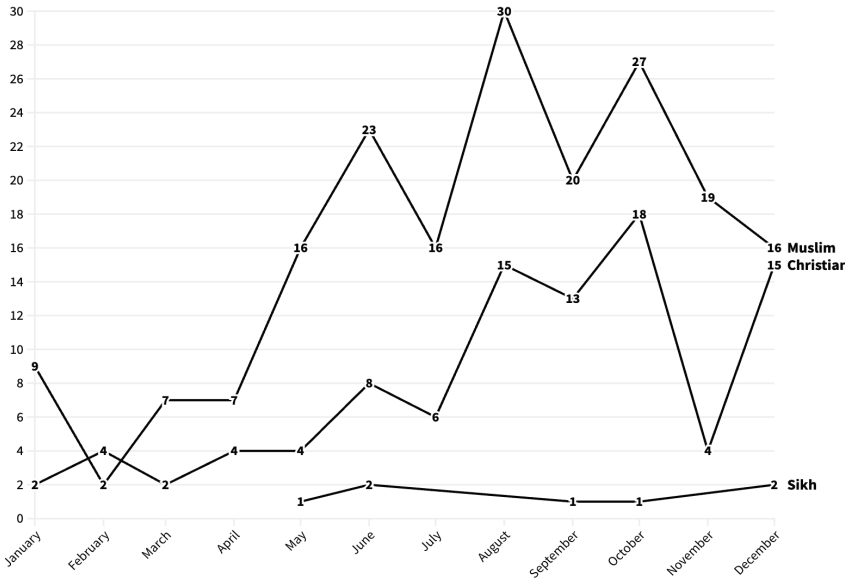


against members of the Sikh community, we found several cases of enforced disappearances and extrajudicial killings.

Statistics

Demonstrating the number of hate crimes committed against religious minorities month wise in the year 2021

Month	Christian	Muslim	Sikh
January	02	09	
February	04	02	
March	02	07	
April	04	07	
May	04	16	01
June	08	23	02
July	06	16	
August	15	30	
September	13	20	01
October	18	27	01
November	04	19	
December	15	16	02
Total	95	192	07



There is a noticeable persistence of hate crimes committed against religious minorities throughout the year. As mentioned above, the persistence of hate crime is a result of the culture of impunity that illustrates the rising graph of hate crimes. Political campaigns against religious beliefs and the identity of minorities have sustained an atmosphere of hatred against them, which then manifests in what seems like spontaneous acts of mob anger.

State	Ruling Party	Christian	Muslim	Sikh
Bihar	BJP+JDU+HAM	02	05	
Chhattisgarh	INC	06	01	
Delhi	AAP	03	22	
Gujarat	BJP		10	
Haryana	BJP+JJP	06	13	
Himachal Pradesh	BJP		01	
Jharkhand	JMM+INC+RJD	01	05	

Karnataka	BJP	10	22	
Madhya Pradesh	BJP	09	23	
Maharashtra	SS+INC+NCP		02	
Manipur			01	
Odisha	BJD	04		
Punjab	INC			03
Rajasthan	INC+RLP+BTP		04	
Telangana	TRS		03	
Tripura	BJP+IPFT		08	
Uttar Pradesh	BJP	49	62	04
Uttarakhand	BJP	04	03	
West Bengal	AITC		03	
Total		95	192	07

Majority of the cases have been reported from BJP ruled states or states with a BJP-led coalition government. Uttar Pradesh has recorded the most number of hate crimes against Christians, Muslims, and Sikhs in the year 2021 followed closely by Madhya Pradesh and Karnataka.

Pattern and Trend for Bias Motivation Types

The data on hate crimes against religious minorities (Christian, Muslim, and Sikh) has been compiled by referring to the archives maintained by different non-state actors, such as DOTO, Hindutva Watch, WTS, news reports (print and digital), fact-finding reports by civil society organisations and individuals. Patterns of hate crimes and trends will be broken down by bias motivations and offence types, based on the data collected from the above-mentioned sources. The change in trends poses a concern whether it represents actual changes in the occurrence of bias-motivated crimes or reflects the changes in the measurement process, that is whether more hate crimes were recorded in a particular month. The data that has been compiled is representative of the actual numbers. The amount of hate crimes against religious minorities is not accurately measured and documented. The available documented data shows an overall upward trend for hate crime in the year 2021.

The bias motivation category reflects the broader classes of bias (e.g., caste, religion, gender, etc). Only those incidents of hate crimes have been taken into account that were motivated against the members of a minority religion based on the offender's bias against the said religion. The patterns that emerge over time and space become different when the categories of bias motivation are differentiated and separated into bias types, that is anti-Christian, anti-Muslim, and anti-Sikh. Hate crimes motivated by bias against Muslims show an overall increasing trend. The same trend is noted for Christians. The data available for Sikhs is minute for it to be analysed to establish a pattern in terms of trends.

When looking at the available data from the past year, that is 2020, of the three bias motivation types discussed in this chapter, there is a steady increase in the number of hate crime incidents. DOTO documented 16 instances of hate crime against the Christian community. 164 instances of hate crime were documented to be against the Muslim community. 2 instances of hate crime against the Sikh community were documented by DOTO.

Upon further analyses, of hate crime on the basis of victimisation, the number of victims as a unit of a hate crime has been taken into account, rather than taking the incident as a unit. It is imperative to consider the numbers in relation to the number of victims because one single act of hate crime may have directly affected more than one individual in a community. In relation to hate crimes, victimisation also applies to the larger group based on which individual/individuals are victimised. It is here that the basis of bias for a hate crime is the group identity of the victims rather than their immediate individual identity, which then accounts for larger victimisation of that community.

The year 2021 witnessed 221 victims from the Christian community in 95 instances of hate crimes. 606 victims from the Muslim community in 192 instances of hate crimes. 21 victims from the Sikh community in 7 cases of hate crimes. It is found that the number of people victimised by acts of hate crimes is more than the act of hate crime itself. An average of at least 2.4 victims per hate crime in the case of Christians, 3.5 victims per hate crime against Muslims and 3 victims per hate crime in the case of Sikhs.

It is also noted that many times the victims of a hate crime go through

post-crime victimisation or secondary victimisation. Secondary victimisation refers to victim-blaming/harassment and intimidation of the victims and their families on part of the criminal justice system that is the law enforcement following an original case of victimisation. It is found that a number of hate crime instances in the year 2021 suggests secondary victimisation of religious minorities is very common and also follows an upward trend for all three minority religions.

The study of hate crime by specific bias type allows the unearthing of the varying patterns of hate crime for the targeted groups, which might be missed if hate crimes are simply measured collectively.

Pattern and Trends of Hate Crime Offences

This subsection will discuss the patterns and trends among hate crime offences. The criminal/offence part of a hate crime will be analysed. DOTO categorises 26 different offences under ‘Nature of Violence’ in its database. These offences are, attacks on religious festivals/places of worship, breaking vehicles, communal tension/violence/riot, demolition/attack on property, denial of access to public spaces/institutions, discrimination in education, discrimination in employment, economic boycott, encounter killing/attack, extra-legal acquisition/appropriation of land, forced conversion, harassment, hate speech/slander, housing discrimination, institutional discrimination, murder/lynch, people leaving traditional food habits/livelihood/property, physical assault, rape, sexual harassment, social boycott, threat, unlawful detention, vandalism/hooliganism, verbal abuse, and other.

In this chapter, hate crime offences are categorised into the following types, attack on religious place/worship, communal violence/riot, denial of access to public space, discrimination, hate speech, harassment, lynch/murder, online, physical assault, police violence, sexual violence, threat/intimidation, and vandalism. Many instances indicate overlapping offence types, to make sense of the data, we have categorised the instances/acts of hate crimes according to the most heinous criminal offence.

A complexity that arises when categorising hate crimes based on the offence type is that a single instance of hate crime records a number of offences committed. That is, for example, an incident of hate crime that in-

volves physical assault may also involve vandalism or threat/abuse, etc. To be able to analyse offence types efficiently, only the most gruesome offence type has been used to identify each incident of hate crime, in this chapter.

Attack on Religious Place/Worship: The year 2021 recorded 51 instances of attacks on religious places/worship, 30 of these instances were committed against the Christian community, 7 against the Muslim community, and 2 against the Sikh community.

Communal Tension/Riot: The year 2021 has recorded 11 instances of communal tension/riot. All 11 were targeted against the Muslim community.

Denial Of Access To Public Space: The year 2021 recorded 12 instances of denial of access to public space, wherein, 1 instance was against Christians and 11 were against Muslims.

Discrimination: The year 2021 recorded 7 incidents when members of the minority community were discriminated. 2 incident was directed against members of the Christian community, 4 incidents where members of the Muslim community, and 1 incident where a Sikh faced the same.

Hate Speech: The year 2021 recorded 23 incidents of hate speeches. 3 incidents of hate speech against Christians and 20 of the same against Muslims.

Harassment: The year 2021 recorded 25 instances of harassment against members of minority communities. 10 of such incidents were against the Christian community, 14 against the Muslim community, and 1 against the Sikh community.

Lynch/Murder: The year 2021 recorded 28 cases of lynching or murder, out of which 1 was against the Christian community, 26 cases were against the Muslim community, and 1 against the Sikh community.

Online: The year 2021 recorded 3 instances of online hate crimes, all three against the Muslim community.

Physical Assault: The year 2021 recorded 89 cases of physical assault.

26 were committed against members of the Christian community and 63 cases of the same against members of the Muslim community.

Police Violence: Police violence against minorities is mostly overlooked and very less often considered as a result of the structured prejudices prevalent against the victim communities. The incidents taken into account do not include, extra-judicial killings, illegal detention, custodial torture or, custodial death.

The year 2021 recorded 16 instances of police violence, 7 against the Christian community, 7 against the Muslim community, and 2 against the Sikh community.

Sexual Violence/Assault: The year 2021 recorded 4 instances of sexual violence/assault, all 4 were committed against members of the Muslim Community, and 2 of the above-recorded instances were that of rape.

Threat/Intimidation: The year 2021 recorded 20 instances, 14 instances where the Christian community was at the receiving end of threat/intimidation and 6 where the same was applicable to the Muslim community.

Vandalism: The year 2021 recorded 5 incidents of vandalism. 1 against the Christian community and 4 against the Muslim community.

The significance of studying hate crimes by offence types is to identify which type of hate crime is more common in occurrence and which type of hate crime is largely uncommon.

Response of Law Enforcement

Role of law enforcement agencies constitutes a bigger bias in cases of hate crimes against minorities.³³ The absence of a definite meaning and insufficient legal provisions to implicate offenders of hate crime leaves much on part of the law enforcement's discretion to act upon. There is a definite lack of action on part of the law enforcement against perpetrators of hate crimes that reveals a bigger pattern of discrimination in the criminal-judicial system.

33 Chopra, S., Jha, P., Rastogi, A., Koli, R., Mander, S., & Mander, H. (2012). Accountability for mass violence: examining the state's record.

The records show a clear bias of the police by detaining or arresting the victims of hate crimes leading to their secondary victimisation. Several incidents have highlighted a repeated trend of police detaining the victims on allegations of hate crime offenders of members of minority communities.³⁴

There are also noted incidents of police helping the offenders in a crime or overlooking the offence that is committed.³⁵ There are also incidents wherein law enforcement personnel have in fact engaged in offences against members of the minority community.³⁶ Institutional power and lack of accountability of law enforcement make the victims of hate crimes directly or indirectly affected by police action or inaction.

There are also incidents where the police have filed First Information Reports (FIRs) against the victims³⁷ making it all the more difficult for them to be able to seek justice or any redressal. They find themselves in a defeated situation with continued harassment from police. Victims of hate crimes are often forced to withdraw or compromise their complaints because of this. It may also be argued that police discretion allows politically motivated behaviour like arbitrary detention of the victims or refusal to register complaints of the victim or terming the hate crime as a quarrel or clash between two parties, at the behest of political influence or pressure.³⁸

It is also noted that in cases of mob violence or lynching, police have disregarded or failed to act upon the Tehseen S Poonawalla guidelines of the court to prevent the act, punish the offender, and provide redressal to the

34Morning Star News India Correspondent. (2021, May 4). Police Rescue – then Jail – Christian Family Attacked in India. Christian Headlines. <https://www.christianheadlines.com/blog/police-rescue-then-jail-christian-family-attacked-in-india.html>

35 Fact-Finding Report. (2021, October 23). Christians Under Attack In India. Countercurrents. <https://countercurrents.org/2021/10/christians-under-attack-in-india/>

36IYER, A. S., & SHARMA, G. (2021, May 22). Vegetable Seller Faizal Killed in Unnao, FIR Filed Against Police. The Quint. <https://www.thequint.com/amp/story/news/india/faizal-khan-vegetable-seller-killed-in-unnao-up-police>

37Pandey, A. (2021, May 24). Muslim Man In UP Assaulted By Cow Vigilantes, Cops File Case Against Him. NDTV. <https://www.ndtv.com/india-news/uttar-pradesh-news-cow-vigilantes-muslim-man-in-uttar-pradesh-assaulted-by-cow-vigilantes-booked-by-cops-2448233>

38 Shah, N., & Sandler, L. H. (2009). Broken system: Dysfunction, abuse, and impunity in the Indian police. Human Rights Watch.

victims. Police also use discretion in reporting, filing complaints, investigation and other legal procedures.

Harassment by police officials against minority communities is a category of hate crime that escapes being termed as one and also leaves very little or no scope for relief for victims of police violence. Police discretion is not the only problem when it comes to the response of law enforcement in dealing with a hate crime but the arbitrary and unchecked exercise of discretion mixed with impunity and power is.

Response by Elected Representatives

With the ensuing rise in Hindu majoritarianism, elected representatives are often seen making hate speeches leading up to violence. Several MPs and MLAs of the BJP have not shied to lay bare their prejudices against minorities, even on camera. There is an absence of response on part of the Prime Minister of India to denounce even the most gruesome cases of hate crimes against religious minorities. The prime minister's silence on rising violent intolerance can be decoded as approval of these cases.

It is important to note that politicians have many times directly engaged in politics of cow protection or forced conversion or demography change or threat to the honour of Hindu women or other such campaigns that mostly attack religious minorities. These campaigns encourage hateful or biased beliefs against members of minority communities that act as catalysts to a long process of systemic violence and persecution.

‘Till cow is not accorded the status of ‘Rashtra Mata’ (Mother of the Nation), I feel the war for Gau Raksha (cow protection) will not stop even if Gau Rakshaks (cow protectors) are put into jails or bullets are fired at them’. – T Raja Singh Lodh, BJP lawmaker, Telangana state.

‘We won’t remain silent if somebody tries to kill our mother. We are ready to kill and be killed’. – Sakshi Maharaj, BJP member of parliament, on the killing of Mohammad Akhlaq.

BJP Chief Minister of Uttar Pradesh, Ajay Singh Bisht (Yogi Adityanath), in November 2017 stated, ‘There is only one way to protect Indian culture: to protect Gau (cows), Ganga, and Gayatri (goddess)... Only the community that can protect this heritage will survive. Otherwise, there will

be a huge crisis of identity, and this crisis of identity will endanger our existence.’

In this chapter, there are incidents that have been documented where elected representatives have engaged in giving hate speech, making them direct offenders of hate crimes.³⁹

There are also cases where elected representatives have threatened and intimidated members of minority communities.⁴⁰ There were a few instances of harassment at the hands of elected representatives.⁴¹

A few cases of elected representatives disrupting religious gatherings or dictating members of minority communities to not hold religious gatherings have also been recorded in the year 2021.⁴²

A comfortable majority of the BJP has made the opposition irrelevant. Opposition leaders also seem unaffected by the starting increase in hate crimes. It is often argued that it is a calculated silence from part of the opposition parties and leaders because of the fear of losing Hindu votes.

Conclusion

India has bloodied history of violence against minorities, from state-sponsored mass violence to of late vigilante attacks and lynching. One can argue that of all the different styles of persecution, be it institutional discrimination by state actors/institutions or others, the impact of hate crimes on the minds of religious minorities is that of being in a perpetual state of being constantly under attack and that of infinite fear.

Hate crimes, their persistence, and their regularity serve a political purpose. The lack of response, or in fact, the will to respond, on part of the

39Singh, N. (2021, December 26). Karnataka: BJP MP Tejasvi Surya Calls for 'Ghar Wapsi' of Muslims, Christians. The Quint. <https://www.thequint.com/news/karnataka-bjp-mp-tejasvi-surya-calls-for-ghar-wapsi-of-muslims-christians#read-more>

40 Fact-Finding Report. (2021, October 23). Christians Under Attack In India. Countercurrents. <https://countercurrents.org/2021/10/christians-under-attack-in-india/>

41 The Wire Staff. (2021, December 27). BJP MLA in Loni Threatens Meat Seller With Jail Without Bail, Forbids Sale of Roosters. The Wire. <https://thewire.in/communalism/roosters-wont-be-sold-in-loni-bjp-mla-threatens-poultry-sellers-with-jail-without-bail>

42 Fact-Finding Report. (2021, October 23). Christians Under Attack In India. Countercurrents. <https://countercurrents.org/2021/10/christians-under-attack-in-india/>

criminal justice system in India serves as an instrument to further hate and normalise criminality when it comes to religious minorities, in Indian society. This also acts as a catalyst, in the ever-increasing radicalisation of the Hindu Majority.

Acts of hate crime do not have a single offender or a single victim, it is the niche of hate crimes in India where the hate is shared and the victimisation is also shared. The offender's identity/group affiliation is equally relevant when it comes to hate crimes because the pattern of hate and the impunity enjoyed is a result of this identity/group affiliation. The majority-minority relations also reify elements of power and conflict. It is important to understand the elements of power and the creation of a perpetual conflict to be able to identify the perpetrators and the network that enables hate and hate-inspired criminal offence.

The pattern of hate crimes against religious minorities is that of offence with direct acts of direct violence against minorities and offendedness (taking offence) from the identity, belief, and presence of minorities. This two-fold process ensures constant victimisation and persecution of religious minorities. These patterns are spelled out through a propaganda model that sweeps through political and social discourse.

Media has its own role to play in furthering marginalisation and alienation of minorities. The media of any country has the core values of the state and cannot be considered in a vacuum. It contributes to public opinion building, inciting violence, propagating/campaigning for certain ideologies, and to emanate politically charged emotions.

Broken bodies, brutality, and constant fear have become an everyday lived reality of religious minorities in India in the form of physical attacks, threats, vandalism, verbal abuse, etc. The regular recurrence of hate crimes creates fear psychosis in the mind of oppressed minorities which has far-reaching consequences on their lives. The normalisation of violent hate against religious minorities should come to an end. The judicial and criminal justice system has to ensure the indemnity of religious minorities who are direct victims of hate and systemic persecution.

Minorities on Prime Time: An inquiry into the portrayal of Christians, Muslims, and Sikhs on Television News

Tazeen Junaid

“Minorities no longer need a boarding pass. What they need is an upgrade.”

*Bradley S. Greenberg and Jeffrey E. Brand,
Book Cultural Diversity and the U.S. Media*

This chapter examines the representation and portrayal of religious minority groups – Muslims, Sikhs, and Christians – on prime time television news. Three prime time broadcasts, each of different news channels, were analysed with quantitative and qualitative methods of content analysis. Consideration has been given to theoretical perspectives on (a) the influence of media on public opinion, (b) the presence of ethnic blame in newsrooms, (c) the portrayal of minorities on television, (d) television as a public sphere, and (e) news media influencing effects on the audience. The findings have reflected that despite numerical representation, religious minorities are misrepresented and targeted through content-laden language on television news. The findings are not exhaustive, but they are representative of other news-channels as each selected broadcast caters to a niche audience sharply different from the audience of other two broadcasts, retaining findings of content viewed by a national audience composed of groups from different economic, language and ideological backgrounds. As India becomes increasingly intolerant towards religious minorities, the findings gain higher significance as it provides a module to measure levels of intolerance while scrutinising mediums perpetuating intolerance among the masses.

In September 2017, the editor of Hindustan Times newspaper, Bobby Ghosh was fired because the Indian Prime Minister, Narendra Modi had found it undignified for a foreigner to run the newspaper. Ghosh, Indian by birth and American by citizenship, had been running the third-largest circulating English newspapers for more than a year when he decided to launch an online portal monitoring hate crimes by the name of Hate Tracker.¹ With the launch, Ghosh unintentionally embellished himself on the radar of the state and two months after the launch, was relieved of his duties.

News media is one of the few mediums that represents the popular view,

1 Audit Bureau Of Circulations. (2019). Audit Bureau Of Circulations. [http://auditbureau.org/files/JD%202019%20Highest%20Circulated%20\(across%20languages\).pdf](http://auditbureau.org/files/JD%202019%20Highest%20Circulated%20(across%20languages).pdf)

plays a simultaneous role in cultivating a popular view and fanning it across the masses. As such, it is a threat for establishments particularly the state as a platform with the potential for depicting the failures of the state and in the process, sowing discontentment amongst the populace regarding the state as an institution. Hence, the state either censors the media or controls it. Currently, some states censor news directly as in North Korea and China while other states practise censorship through indirect means. In an indirect mode of censorship, media is controlled by conglomerates or unidentified key players, both of whom are prone to the influence of political parties.² Indirect censorship is more threatening as it not only censors news but also produces it through lies or exaggerations. News media of India experienced direct censorship, then privatisation and is currently undergoing severe levels of indirect censorship since Modi, as the leader of a right-wing nationalist party, has come to power as the Prime Minister in 2014.

British colonialism had maintained strict control over news media through licensing, control of newsprint, and providing advertisement revenue. Consequently, television news was subjected to intense censorship by the state as soon as it debuted with the “Doordarshan” channel in 1959.³ Case in point, “Doordarshan” confirmed the death of former Prime Minister Indira Gandhi 10 hours after she was assassinated by her Sikh bodyguards, and proceeded to not cover the subsequent mass killing of around 17,000 Sikhs by Hindus in the national capital as a retributive act of the assassination.⁴

Television news has been historically aligned against religious minorities and has received state impunity for it – it could not cover the anti-Sikh pogrom in the national capital of India and when it did cover another instance of mass violence against a religious minority, the 2002 Gujarat pogrom,

2 Key players refers to the controllers and promoters of news outlets, who invest and own part of news outlets through complex holdings, entities and front companies to avoid identification. All such key players have large controlling stocks and interests in the news outlets. However, they cannot be linked to political parties as they remain unidentified.

3 Ram, N. (2000). The great Indian media bazaar: Emerging trends and issues for the future. India: Another Millennium, 241-285.

4 Joseph, P. (Ed.). (2016). The SAGE encyclopedia of war: Social science perspectives. Sage Publications.

it failed to highlight the complicity of the state. In 2002, violence broke out in Gujarat following the burning of Godhra train and three major news channels – “Zee News”, “Aaj Tak” and “Star News (NDTV)” telecasted footage of burnt bodies being carried out of the train,⁵ claiming the victims to be “Ram Sevaks (Servants of Hindu god Ram)” while accusing Muslims for burning the train.⁶ However, during the following anti-Muslim pogrom in Gujarat, “Zee News” and “Aaj Tak” did not name Muslim victims but did name Muslim aggressors, toeing the line set by the assertion of then Chief Minister of Gujarat, Narendra Modi who had justified the anti-Muslim pogrom as a justified act by Hindus against Muslims who “could only be attackers; they could not be defending themselves”.⁷ Non-confirming to the line of Modi government, “Star News (NDTV)” telecasted images of deliberately targeted Muslim victims and complicit police force and faced a crude backlash by the state – telecasts of “Star News (NDTV)” were banned in Gujarat by the Modi government.⁸

Corporatisation of Media

From 1982, television screens began developing but news remained state-controlled.⁹ “Doordarshan” airing news bulletins in a sophisticated manner – maintained strict control over news content – was in turn controlled by the ruling central government. Prannoy Roy, in an attempt to jar the sophistication of “Doordarshan”, launched New Delhi TV (NDTV) on “Doordarshan” with the broadcast “The World This Week”, telecasting a bulletin of news highlights from all over the world.¹⁰ However, the

5 The sequence of events resulting in the torching of S-6 coach of the Sabarmati Express is a disputable issue with a police forensic enquiry concluding the coach was burnt from inside. However, a court convicted 31 Muslims for conspiring and burning the coach, none of whom had access to be inside the train.

6 Mehta, N. From Arkansas To Ahmedabad: Situating The Politics Of Television In The 2002 Gujarat Riots.

7 Varadarajan, S. (Ed.). (2002). Gujarat, the Making of a Tragedy. Penguin Books India.

8 Mehta, N. From Arkansas To Ahmedabad: Situating The Politics Of Television In The 2002 Gujarat Riots.

9 In 1982, monochrome television was replaced by colourful television screening. Doordarshan made way for its sister channels DD1 and DD2 which regularly broadcasted, of which DD1 began telecasting entertainment shows such as “Ramayan” and others. However, all three channels were controlled by the government.

10 Khorana, S. (2014). The politics is populist: Talk shows, political debates, and the middle-class public sphere in India. *Media International Australia*, 152(1), 98-107.

ensorship remained – news bulletins pertaining to India were off-limits. The state-controlled news was threatened substantially in 1989 with “Newstrack”, a video news magazine circulated on videocassette recorders. “Newstrack” was the first news broadcast to cover issues ignored by “Doordarshan” such as the Babri Masjid demolition, Bombay Bombings and Kashmiri militancy, and shook the Indian audience awake.

In 1991, Indian audiences were shaken awake again after viewing CNN’s live coverage of the Gulf war. In the same year, India opened its economy to globalisation and soon, cable television arrived in India. “Star News (NDTV)” followed by others including “Aaj Tak” launched as news channels broadcasting news 24/7. News media transformed under the neo-liberal and market-oriented policies associated with the open economy of India. As news channels flourished across the nation, news television was also being corporatised. Instead of being limited to the state or share market, ownership of media houses extended to business conglomerates and key players whose identities remain hidden behind holdings and entities.

Even before 2014, the commercialisation of news as a commodity was complete. A prime example of the commercialization exists in the notion of “paid news.”¹¹ Paid news refers to the non-transparent practice of paying newsrooms to produce favourable reports and stories. The public consumes the news as authentic reportage as they are not informed of the commercial production of the news. It first emerged in 2003 when the largest English Indian newspaper, The Times of India (TOI), launched a new division of the newspaper with a rate card for selling the news. The division breached the strict division between advertisements and news stories. Soon the launch became a trend and over 500 television channels and newspapers had adopted the paid model of TOI with the slight but crucial difference that they did not inform the consumers of whether the news was paid for or not.¹² The practice became more brazen and several journalists including the late Prabhash Joshi appealed the Press Council of India to act against the journalistic malpractice.

11 Disproportionate coverage of the speech or activities related to a person or a topic on several television and radio channels as well as on newspapers and the same coverage appears on different platforms simultaneously or within a close time period.

12 Times of India had included a disclosure of paid news reports by placing the phrase “advertorial, entertainment promotional feature” in small sized font before the beginning of the paid articles.

At that point in time, the Indian press was already owned by media conglomerates and the same pattern of ownership had emerged in outlets of television news.¹³ Mukesh Ambani and Mahendra Nahata, both related to Reliance Industries, are the moguls of the mediascape. The Reliance industries loom large over television news media: Ambani owns Reliance industries and Nahata is on the board of one of Reliance’s important ventures. Five companies dominate the television news channels – India TV, NDTV, Network 18, News 24 and News Nation. All five are indebted to either Ambani or Nahata through two important pieces: Shinano Retail and Vishva Pradhan Commercial Private Limited (VCPL). Nahata partly owns a significant number of shares in media companies NDTV, News24, India TV and News Nation through various holdings such as VPCL, Eminent Networks, Digivision, and Infotel, while Mukesh Ambani heavily invested in Network 18. Ambani, currently heading more than 70 news media outlets across print, television and internet, reportedly maintains close ties with Modi. He has even implemented a rightward shift in Network 18 through instructions “to carry material promoting Modi; voices of protest are learnt to have been stifled or silenced.”¹⁴

Besides these five dominating media conglomerates, others include the Essel Group owned by Subhash Chandra that distributes media including the news channel “Zee Media”, the NewsLive run by the wife of BJP politician Himanta Biswa Sarma, and Odisha TV owned by the family of BJP politician Baijayant Jay Panda. Another media conglomerate family – Purie and Birla – control the India Today Group’s flagship firm, Living Media India Limited, which distributes four television channels including “Aaj Tak” and “India Today.”¹⁵

13 Congress politicians, including India’s first Prime Minister, termed newspapers of “Times Group” as jute press because its owners controlled New Central Jute Mills, the newspaper The Statesman as steel press as it was partly owned by the Tata group that was heavily invested in the steel industry. The term steel press was also briefly used to refer to the newspapers published by the “Indian Express” group as its owner had tried to control the Indian Iron and Steel Company. These terms did not only point to the existence of media conglomerates, but also suggested the news companies had vested interests in policies related to industries and would repeatedly try to influence the government for commercial gains.

14 Raman, A. (2022, February 5). Clogging The Ink. Outlook India. <https://www.outlookindia.com/magazine/story/clogging-the-ink/289263>

15 Rajagopal, A. (2017). On media and politics in India: An interview with Paranjoy Guha Thakurta. *South Asia: Journal of South Asian Studies*, 40(1), 175-190.

In this manner, the majority of television news outlets became corporatised by 2013. This corporatisation is aligned across the political spectrum. Owner of News24, Anuradha Prasad is the sister of BJP leader and telecom minister Ravi Shankar Prasad; she is also married to a Congress politician. Rajat Sharma who owns India TV had been a leader of Akhil Bharatiya Vidyarthi Parishad (ABVP) – BJP’s student wing and a member of the RSS. Radhika Roy, co-promoter of NDTV, is sister of Brinda Karat – a senior leader of Communist Party of India- Marxist (CPI-M). Abhay Oswal, owning 14.17% of NDTV, is related to Congress leader Naveen Jindal.

In 2014, the Telecom Regulatory Authority of India (TRAI) took cognizance of the corporatisation of television news. It also published a paper, warning against media conglomerates consolidating ownership over news media and underlined the manner in which such ownership threatens the plurality of news and views.¹⁶ However, bodies such as TRAI have no power to implement its recommendations. News outlets dismissed the paper with near uniformity and comments such as “recommendations on media ownership need to be thrown into the nearest dustbin.”¹⁷

Mainstream-ization of News

Previously state-funded, the news channels underwent a radical shift towards consumerism with the advent of private news channels that depended on advertisement money requiring high television rating points (TRP—a metric that measures the size of an audience reached through a specific media channel). The channels now had to produce content for round-the-clock news broadcasts while competing with entertainment channels for the ratings, putting tremendous pressure on the values and methods of newsgathering, analysis, and commentary.

16 Pahwa, N. (2014, August 14). The Lowdown: TRAI recommendations on Media Ownership, Vertical integration, Paid News, Private Treaties, Disclosures & More. MediaNama. <https://www.medianama.com/2014/08/223-the-lowdown-trai-recommendations-on-media-ownership-vertical-integration-paid-news-private-treaties-disclosures-more/>

17 R Jagannathan was the editor of the news website FirstPost when he penned an editorial on the paper of TRAI with the title: Trai’s media ownership curbs make no sense: half of India’s media may have to shut down. FirstPost is part of Network 18, controlled by media conglomerate Reliance.

With the burden of salaries, heavy equipment, and other running costs, channels required brisk methods and impactful results to achieve high TRPs. “Aaj Tak” was amongst the first channels to tap into the Hindi speaking population as its target demographic in order to increase TRP. It was also the first channel to introduce short sound-bite journalism¹⁸ and disguise supernatural myths, crime thrillers, tarot shows, conspiracy theories, and Hindu religious practices¹⁹ as news broadcasts. Consequently, the quality of television news degenerated with alarming forays into ghost, suspense, crime and thriller broadcasts served as news.

In all ways, “Star News (NDTV)” differed radically from its counterparts including “Aaj Tak.” While other channels depended on fanaticism, hyper-partisanship, and sensationalism to attain TRPs, “Star News (NDTV)” depended on celebrity journalists doing credible journalism.²⁰ “Star News (NDTV)” generated a new form of journalism where journalists became celebrity figures. The channel produced celebrity journalists such as Barkha Dutt and Rajdeep Sardesai who became famous for reporting live from riots and wars, Ravish Kumar who became famous for reporting from the ground in a humane way, and Arnab Goswami for his distinguished debating skills. “NDTV” split from “Star News” to become “NDTV” in 2003.

Unlike Dutt, Sardesai and Kumar, Goswami became a celebrity journalist after he left “NDTV” and entrenched himself in the “Times Now” newsroom for four days during the 2008 Mumbai attacks, continuously airing live telecasts to demand the resignation of the then Home Minister. There was public anger against the system and Goswami successfully tapped into it: “Times Now” firmly topped TRP ratings. Goswami was allotted a prime-time broadcast where he raised questions on behalf of the common man, in the process becoming catharsis for the masses, and continued to attain high TRPs. In no time, all channels had an anchor who wanted to represent public anger; an anchor who wanted to become the next Goswa-

18 Thakurta, P. G., & Seabright, A. (2011, August 8). ‘Murdochisation’ Of The Indian Media By Paranjoy Guha Thakurta And Alice Seabright. IM4Change. <https://www.im4change.org/latest-news-updates/murdochisation-of-the-indian-media-by-paranjoy-guha-thakurta-and-alice-seabright-9412.html>

19 Ninan, S. (2006, October 17). Soft in the head? The Hoot. <http://asu.thehoot.org/media-watch/media-practice/soft-in-the-head-2335>

20 Khorana, S. (2014). The politics is populist: Talk shows, political debates, and the middle-class public sphere in India. *Media International Australia*, 152(1), 98-107.

mi.²¹

In 2011, when a movement against corruption popularly known as Anna Andolan began, news channels supported it wholeheartedly and brought the revolution to the drawing room of Indian households.²² Anna Andolan culminated with the decisive fall of the ruling government of Congress and its replacement by the BJP.²³ Following BJP's win, news channels became an extension of the government, with an incremental increase in broadcasts propagating the ideology of far-right Hindu nationalism.²⁴ Consequently, the content of television news massively degraded and became majorly composed of fanaticism, sensationalism, hyper-partisan, degraded subjects, and gladiatorial debates – consisting of flamboyant expressions of rage and mutual contempt.²⁵

The bias against religious minorities was present in the Indian news media since its inception and the media spectacularly failed in its role as the watchdog of democracy, as would be established through the chapter. However, since mid-2014, when Narendra Modi of the BJP began ruling the country as Prime Minister, the bias has multiplied incrementally. Besides the increasing bias, there has been an increase in violence targeting journalists and political partisanship of media outlets, demonstrating the variety of crises threatening press freedom in India. This is largely because BJP is the embodiment of right-wing Hindu nationalism. Hindu nationalism conceptualises India as Akhanda Bharat²⁶ – as a Hindu supremacist

21 FPJ Bureau. (2019, May 30). Arnab Goswami: A cheerleader or Journalist? Free Press Journal. <https://www.freepressjournal.in/analysis/arnab-goswami-a-cheerleader-or-journalist>

22 Alex, R. (2015). The politics of representation in Indian media: implications of the portrayal of Hindus and minority groups (Doctoral dissertation, University of Westminster).

23 Mishra, S. (2021, April 8). Ten years of Anna Andolan: Who benefited from the anti-corruption movement? The Week. <https://www.theweek.in/theweek/cover/2021/04/08/ten-years-of-anna-andolan-who-benefited-from-the-anti-corruption-movement.html>

24 Goel, V., & Gettleman, J. (2020, May 6). Under Modi, India's Press Is Not So Free Anymore. The New York Times. <https://www.nytimes.com/2020/04/02/world/asia/modi-india-press-media.html>

25 Khorana, S. (2014). The politics is populist: Talk shows, political debates, and the middle-class public sphere in India. *Media International Australia*, 152(1), 98-107.

26 Akhanda Bharat is a term used by Hindu nationalists to refer to the concept of a

nation where other religions are non-existent, viewing the Muslim minority as its arch-enemy as their ancestors, Mughals, were responsible for the fall down of the Hindu empire. Consequently, BJP is obsessed with destroying religious minorities and does not entertain any dissent, even from Hindus.

The acceleration of bias against religious minorities did not happen overnight. Despite having huge market valuations and an elaborate structure, Indian news media sustains itself on advertisement money from local, regional and central governments. The alternative option for sustenance is corporate funding. This is where the current Prime Minister Narendra Modi comes in. Modi headed a complex negotiation between BJP and conglomerates owning outlets in news media. In the 2014 elections, the corporate media supported Modi in an unprecedented manner due to the negotiated agreement. Modi, depending completely on the corporatised television news, even stopped paying its public relations agent as early as 2013.²⁷ 60% of the BJP's election budget went into advertisements and publicity. Corporatisation of news media and the corporate support for Modi tied together immaculately: BJP won the 2014 general elections with a majority mandate.

It is becoming increasingly difficult for journalists to practise ethical journalism as the corporate support in news media for Modi did not remain delimited to election seasons. Instead, the corporatised media became loyalists to Modi and arm-twisted the newsrooms into cutting down reportage critical of the BJP and increasing the publication of reports praising the party. This arrangement also served the commercial interests of the newsrooms that often had to compromise editorially to acquire advertisement business. As the central government – one of the biggest advertisers in print and television news media – began funnelling more than 100 thousand dollars²⁸ each day of advertising in the news media, the wallets

unified Indian nation-state encompassing the territories of India, Pakistan, Bangladesh, Nepal, Bhutan, Tibet, Myanmar and Sri Lanka. The term is often used as a slogan by Hindu nationalist organisations to demand a nation state of Hindu nationalists repressing its minorities.

27 Singh, S. (2013, November 11). Modi, Media and Money - Open The Magazine. Open Magazine. <https://openthemagazine.com/features/india/modi-media-and-money/>

28 Anwar, T. (2016, December 3). Gov Spends Rs 1.4 Crore On Ads Everyday, Spent 10 Cr On Expenditure On Demonetisation Awareness Campaign!. Indiatimes.com. <https://>

of the newsrooms thickened.²⁹ The Press Freedom Report 2010 concluded that favourable information of advertisers is disseminated and unfavourable information is blacked out.³⁰

Hence, a pattern of information benefitting the BJP being packaged and parcelled as news was soon detectable on national news television. The funnelling of government money in news media also resulted in the emergence of newsrooms of Godi Media³¹ such as Times Now and Republic TV telecasting content that is a mix of BJP propaganda, nationalism, and populism. Consequently, Modi is now not just controlling the flow of news but implementing the narrative of India as a Hindu nation dominating religious minorities.

The remaining newsrooms, not toeing the invisible line of the state, practice self-censorship to avoid offending the government as the offended government will not buy advertisement space, leading to grave financial losses as the government remains the biggest source of advertisement money and in turn the biggest source of revenue of news media houses. This retributive attitude of the government becomes more evident in newsrooms that neither self-censor nor toe the line of the state. These recalcitrant newsrooms are embroiled in cases with criminal charges, subjected to digital and actual harassment campaigns by Modi supporters popularly known as bhakts³², and journalists of these newsrooms are often relieved of their duties in instances similar to that of Ghosh: after the Open magazine published the expose of Modi manipulating newsrooms, its then editor Hartosh Singh Bal was immediately fired for making polit-

www.indiatimes.com/news/india/modi-government-spends-rs-1-4-crore-of-tax-payers-money-on-ads-everyday-expenditure-on-demonisation-awareness-campaign-stands-at-whopping-rs-10-crore-266548.html

29 India. (n.d.). India | RSF. <https://rsf.org/en/country/india>

30 Thakurta, P. G., & Reddy, S. K. (2010). "Paid News": How corruption in the Indian media undermines democracy. Press Council of India.

31 The term "Godi Media", coined by Indian journalist Ravish Kumar, literally means lapdog media and is used to refer to news outlets of both press and television that are engaged in yellow journalism as mouthpieces of the BJP.

32 Bhakt is the romanized version of the same word of the Hindi language that means 'devotee'. The word was limited to religious contexts until it was made popular in the early 2010s. The supporters and loyalists of BJP politician and Indian Prime Minister Narendra Modi are referred as Bhakts by news outlets.

ical enemies; Siddarth Varadarajan was also relieved of his duties as editor-in-chief of the newspaper *The Hindu* for underplaying Narendra Modi in the reportage of the newspaper. These media casualties are not limited to national scale large media outlets, they penetrate local and regional media outlets as well. Thiru Veerapandian lost his 17-years-old show on the regional channel Sun TV for telling his audience to think before voting for Modi. Senior Network 18 journalists Sagarika Ghose and Nikhil Wagle, vocal critics of Modi on Twitter, were often targets of digital harassment campaigns by bhakts on the social media site. Following the campaigns, both journalists were pressurised by the Network 18 management to reign in their criticism on social media platforms. The journalists later resigned from their respective positions at Network 18. In four years of governance from 2014 to 2018, the Ambani group of industries that maintain close ties with Prime Minister Modi has filed 28 defamation suits against journalists and media outlets. In Gujarat, the casualties were worse with journalists being charged with sedition for publishing investigative reportage on government officials. After 2014 when Modi won, such cases have become the norm in the national city and other states where BJP was in power. These media casualties have led to increased self-censorship in newsrooms, to the extent that India fell three spots on the World Press Freedom Index below Afghanistan and Burma in 2017.

However, even news channels who toe the line are prone to scathing assaults for adopting a slightly critical tone of the right-wing nationalist party. Rahul Kanwal, a journalist who has been associated with news channels such as “Aaj Tak” and “Zee News” that was the first to transition from sombre journalism to sound-bite journalism and signalled the degeneration of news television, often toes the government line. Kanwal was accused by an office holding minister in the central government of propagating Pakistan's side even before he could complete his question related to the number of deaths in the Balakot strike.³³ This public accusation occurred at a conclave held by India Today.³⁴ The right-wing nationalist

33 Subrahmaniam, V. (2019, March 12). Speaking Truth to Power: The Indian Media's Descent from Sharp Hawks to Screeching Parrots. *The Hindu Centre*. <https://www.thehinducentre.com/the-arena/current-issues/article26507482.ece>

34 India Today Conclave is a global thought platform of India Today network organised annually and attended by prominent journalists as well as representative journalists from notable media outlets of print, television, digital and radio as well as

party requires absolute impunity and loyalty from the fourth estate of journalism. The media outlets aiming for prosperity must either praise the right wing party or not publish anything at all. Indian news media has been compromised at all levels by a right-wing nationalist party espousing the ideology of Hindutva. Such penetration of Hindutva, with the eradication of other religions in favour of the Hindu religion as one of its fundamental principles, has led to a gradual decline in the genuine portrayal and representation of religious minorities in mainstream news media outlets.

In an essay for the Hindu Centre, Vidya Subrahmaniam traced the descent of Indian news media from watch dogs to ordinary witnesses. Written with a critical tone, Subrahmaniam while highlighting the absence of “serious” issues such as declining employment, economic distress and rural crises in news media forgot to highlight the equally glaring absence of religious minorities. Religious minorities are seldom treated as entities in the news media or in its criticism; instead, they are brushed under the rug even as the severity of their persecution rises every day. Subrahmaniam concluded the essay on an optimistic note, recounting several governments that were not reelected after dubious acts of governance, hoping Modi would not be reelected in 2019.

Today, television news has completely reached Indian masses: it has penetrated 60% of Indian households with 392 news channels running 24/7, of which almost all broadcast news shows during prime time.³⁵ Masses watching television as passive audiences seldom cast doubt or raise questions on the prejudiced portrayal of minorities. With its palatability of sight, sound and lifelike representation, television becomes a magic medium – gaining a persuasive ability to exert a powerful impact on the public opinion, behaviour and attitude of the audience. In August 2008, mass violence targeting the Christian community was carried out in the eastern state of Odisha. The violence, which stretched over a month and spread across 600 villages, led to the murder of 100 Christians, sexual assault of 40 women, vandalism of 300 churches, and displaced 56,000 people.³⁶ Be-

politicians, bureaucrats and businessmen.

35 Krishnan, A. (n.d.). India | Reuters Institute for the Study of Journalism. Reuters Institute. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021/india>

36 Athialy, J. (2018, September 5). Kandhamal riots 10th anniversary: A photo exhibition revisits the horrors. Scroll.in. <https://scroll.in/article/892641/in-photos-damaged->

sides, Hindu fundamentalists forcibly converted Christians to Hinduism.³⁷ Ironically, news channels repeatedly telecasted broadcasts on Christians forcibly converting Hindus to Christianity in an attempt to establish that the violence against Christians was an act of justified retaliation by the oppressed Hindu community even as the ethnic violence against Christians was enacted at the hands of Hindutva forces.³⁸ This prejudiced portrayal of Christians was received by television viewers as their actual existence. During fieldwork, political scientist Alex Roji encountered interviewees who believed Christians were killed solely because they forcibly converted Hindus because of the prejudiced portrayal by news channels. This depicts the manner in which a passive and mute audience viewing television portrayal of a community, area or religion, whether positive or negative, allows for reception and acceptance of any portrayal at face value.³⁹

The news has slowly seeped into reality. The interviewees had no personal experience of Christians forcibly practising religious conversion and depended entirely on information from the news media, depicting the influence that television news has, over public opinion. A mass audience of media does not interact or question the news thus, moulding television as not just a medium of transmitting information but a manufacturer creating realities. Indian audiences especially imbue firm belief in live news, viewing “the reporter who appears on the screen tells the truth always.”⁴⁰ News television, as an institution of informing the public, thus has the power to develop and deliver a perception of minorities to the masses.⁴¹

churches-broken-homes-are-the-lingering-scars-of-the-2008-kandhamal-riots

37 Shaji, S. (2018, August 25). 10 Years Post Kandhamal Riots: Let Us Not Forget How It Tore the Secular Fabric. NewsClick. <https://www.newsclick.in/10-years-post-kandhamal-riots-let-us-not-forget-how-it-tore-secular-fabric>

38 Alex, R. (2015). The politics of representation in Indian media: implications of the portrayal of Hindus and minority groups (Doctoral dissertation, University of Westminster).

39 Curran, J. (2010). Media and society. Bloomsbury Publishing.

40 Alex, R. (2015). The politics of representation in Indian media: implications of the portrayal of Hindus and minority groups (Doctoral dissertation, University of Westminster).

41 Marshlian, T. D. (2006). Just delivering the news or something more? How the mass media influence public opinion and public perception. *Modern Psychological Studies*, 12(1), 7.

Conceptual Framework

Considering television as one of the mass mediums responsible for portraying religious minorities to the majority of Indians and the vulnerability of religious minorities to inherent biases in this medium, this research is significant as it depicts the representation and treatment minority groups are conferred in prime-time television shows. Instead of merely limiting it as a medium relaying information, television should also be perceived as a representative of power distribution amongst societal groups. The seat and the voice handed to social groups on television broadcasts are a reflection of their status and wealth in real society. This chapter is part of the report's attempt to investigate representation and effective representation of religious minorities. Here, representation refers to visual representation while effective representation to actual representation with the opportunity to affect actual changes. Effective representation means inclusion with the opportunity to be heard and to make a difference, while representation would in effect be token inclusion. Visible representation without effective representation and vice versa cannot be perceived as actual representation. At most, these representations are appeasement measures, designed to pacify religious minorities of having representation, limited to visuals.

This research was undertaken with the objective of examining and portraying the interrelation between minority and television news broadcasts by focusing on its underlying effects on the appearance of minority groups on television, the representation of minority groups, and the potential of portrayals to influence the perception of the minority groups. The research has focused on the representation of three religious minorities in India – Muslims, Christians, and Sikhs – on news television. The chapter aims to draw not just a quantitative but also a qualitative picture of the representation of religious minorities to answer questions such as who gets to represent minorities and how minorities are represented in news broadcasts. This chapter furnishes empirical data to support the claim that religious minorities are underrepresented, in stark contrast to their population, and misrepresented as caricatures on television news while the majority community dominates the conversations in newsrooms, even as the news channels repeatedly claim to speak for everyone.

In this context, the ways in which Indian news channels operate have many similarities with the American media of the 1960's which the Kerner Com-

mission had accused of neglecting the Afro-American community and favouring news reports “from the standpoint of a white man’s world.”⁴² If a similar commission on Indian media would be assigned today, it will accuse the Indian television news of broadcasting news from the standpoint of a Hindu’s world. The newsrooms are dominated by Hindus, the issues discussed on news pertain to the interests of Hindus, and the targeted consumers of these newsrooms are Hindus. Hence, religious minorities are excepted from newsrooms.

Depriving religious minorities of a seat in the newsrooms is an untenable circumstance, not least because it allows for audiences to perceive religious minorities from a singular lens, which has a higher probability of biases than a multifold lens, but because it adds fuel to the fire of hate crimes against religious minorities by repeatedly telecasting “news” consisting of stereotypes.

In March 2020, prime time news television was flashing headlines blaming the Muslim congregation of Tablighi Jamaat⁴³ at Nizamuddin Mosque for spreading COVID-19 in India. The congregation had been organised before COVID-19 was recognized as a health emergency in India. In fact, on the day the congregation ended, the Health Ministry of the central government officially pronounced: “It is important to understand that it [COVID-19] is not a health emergency.”⁴⁴ However, as soon as PM Modi acknowledged COVID-19 as a pandemic and announced a lockdown, all ongoing programs at Nizamuddin were discontinued. But the visitors were stranded due to the national lockdown. The Nizamuddin administration was coordinating with the local police to arrange transportation for the stranded, when a news channel linked seven COVID-19 deaths with the Delhi congregation.⁴⁵ Soon, all news channels began to repeatedly allege

42 “The Communications Media, Ironically, Have Failed to Communicate”: The Kerner Report Assesses Media Coverage of Riots and Race Relations. (n.d.). History Matters. <http://historymatters.gmu.edu/d/6553/>

43 Tablighi Jamaat is a transnational missionary movement working to make Muslims more religiously observant.

44 Outlook Web Bureau. (2020, March 13). As Cases Rise To 81, Government Says Coronavirus 'Not Health Emergency'. Outlook India. <https://www.outlookindia.com/website/story/india-news-as-cases-rise-to-81-government-says-coronavirus-not-health-emergency/348737/>

45 Beg, M. A. (2020, March 31). Communal Corona? Is It Justified To Blame Tablighi

Tablighis as “super spreaders” and “human bombs”, accusing them of performing “Corona warfare” as a tactic of “Islamic organisations” to mutilate India and its citizens.⁴⁶ The news – not backed by evidence – was consumed as factual information by the Indian masses. Consequently, the Indian masses economically and socially boycotted Muslims.⁴⁷ There were reports of physical assaults on Muslims⁴⁸ and Muslims facing discrimination in accessing health services.⁴⁹ Pregnant Muslim women lost babies as they were denied healthcare.⁵⁰

Stereotypes, such as Muslims as “corona spreaders”, when repeatedly imposed gradually appear logical and legitimize hate crimes such as the brutal assault of Mehboob Ali, a 22 year old Muslim man, in India’s national capital. Ali was returning from a Tablighi Jamaat event in another state to his hometown. He was medically examined and allowed to depart for his village. Before Ali could reach his village, rumours circulated about his plans to spread COVID-19 in the village. These rumours were one of the consequences of the biased coverage by television news. When Ali reached the village, he was confronted by a frenzied mob of villagers including those who had known him for years. The mob took him to farm fields, brutally thrashed him there and threatened to set him on fire.

Jamaat For Nizamuddin Outbreak? Outlook India. <https://www.outlookindia.com/website/story/india-news-corona-outbreak-afflicted-by-communal-virus-blaming-tablighi-jamaat-could-be-misdirected/349784>

46 Sajjad, M. (2020, April 8). Corona Jihad and Media's Communal Polarisation. NewsClick. <https://www.newsclick.in/corona-jihad-and-medias-communal-polarisation>

47 Scroll Staff. (2020, April 14). Covid-19: Muslim vendors stopped from selling vegetables in UP, accused of being Tablighi members. Scroll.in. <https://scroll.in/latest/959111/covid-19-muslim-vendors-stopped-from-selling-vegetables-in-up-accused-of-being-tablighi-members>

48 Frayer, L. (2020, April 23). In India, Muslims Are Attacked And Blamed For Spreading Coronavirus. NPR. <https://www.npr.org/2020/04/23/839980029/blamed-for-coronavirus-outbreak-muslims-in-india-come-under-attack>

49 Special Correspondent. (2020, April 19). Meerut hospital issues advertisement asking Muslim patients to get tested for COVID-19. The Hindu. <https://www.thehindu.com/news/national/other-states/private-hospital-issues-advertisement-asking-muslim-patients-to-get-tested-for-covid-19/article31381182.ece>

50 Maktoob Staff. (2020, April 5). Should Muslims now stop seeking healthcare, asks Owaisi on hospital's treatment refusal to pregnant Muslim woman in Rajasthan. Maktoob media. <https://maktoobmedia.com/2020/04/05/should-muslims-now-stop-seeking-healthcare-asks-owaisi-on-hospitals-treatment-refusal-to-pregnant-muslim-women-in-rajasthan/>

The whole assault was filmed by one of the perpetrators. In the video, Ali could be seen begging for mercy with his hands folded and eyes filled with misery. A report by the University of Exeter concluded the rise in the number of hate crimes against Muslims is encouraged by mainstream politicians and sections of the media.⁵¹ Television portrayals correlate with increase in hate crimes.⁵² Ali's assault is one such hate crime powered by television portrayal. Media content, directly affecting hate and prejudice against minority groups, fuels hate and prejudice, and ultimately leads to hate crimes.⁵³

The chapter builds upon the following theoretical dimensions – television as a sphere, manufacturing consent, ethnic blame and effect studies – to analyse the representation and portrayal of religious minorities in Indian television news, as an attempt to quantify the representation and misrepresentation of religious minorities on television news to raise awareness of the distorted portrayal of religious minorities on news broadcasts in India, with hopes that it will spur further detailed research on the presence, portrayal and representation of religious minorities on television news.

Television as a sphere

Habermas had conceptualised the notion of the “public sphere” in a literal sense as a space of face-to-face interactions resulting in the formation of public opinions and legitimization of the state as an institution.⁵⁴ In the present world, there exists a multitude of versatile spheres including a powerful audio-visual sphere on the television. However, the public sphere imagined by Habermas comprised only white males – dominant and powerful members of German society – leaving behind the impression that a public sphere is designed to “contain several substantial inbuilt and inherent limits and exclusions that severely constrain full participation

51 Githens-Mazer, J., Lambert, R., Baker, A. H., Cohen-Baker, S., & Pieri, Z. (2010). Muslim communities perspectives on radicalisation in Leicester, UK. Aarhus, Denmark: Centre for Studies in Islamism and Radicalisation (CIR), Aarhus University.

52 Pohan, C. A., & Mathison, C. (2007). Television: Providing powerful multicultural lessons inside and outside of school. *Multicultural Perspectives*, 9(1), 19-25.

53 Sherka, H. (2016, June 29). Negative messages about Muslims in the media lead to a rise in hate crimes. *Real Change*. <https://www.realchangenews.org/news/2016/06/29/negative-messages-about-muslims-media-lead-rise-hate-crimes>

54 Calhoun, C. (Ed.). (1993). *Habermas and the public sphere*. MIT press.

and representation of disadvantaged groups.”⁵⁵ Thus, a public sphere of any kind is inbuilt with limits, exclusions, and constraints for minority communities. In spaces where intricate processes such as the formation of public opinions and legitimization of the state occur, the forms and degree of inclusion, exclusion, portrayal, and representation of minorities in public spheres represent the public opinion of minorities and the state treatment of minorities.

Cedric Clark, whilst studying portrayals of minorities on television, gave an evolutionary theory pertaining to the portrayals of minorities in television broadcasts.⁵⁶ The theory proposes an evolution in three stages: non-recognition, ridicule, and regulation. However, the Indian media has portrayed religious minorities in a stagnant perspective since its inception. While a section telecasts a neutral portrayal of minorities, the other telecasts a biased portrayal of minorities. The stagnancy of the portrayal continues with no actual space being provided for the lived experiences of religious minorities. During the Kargil war between India and Pakistan, the news channel “Star News (NDTV)” had covered the war as “a modern India fighting a medieval, Islamist mindset over the border.”⁵⁷ The same perspective is still present in the news coverage of the Indo-Pakistan conflict. Hence, there is no news channel that can lay claim to evolving the portrayal of minorities.

News television at par with other mediums of news media mirrors society, its composition, and its power structures. If television does not provide space to religious minorities, it in effect only communicates information and moulds opinions from the majoritarian perspective. If a majoritarian perspective is broadcasted on television news, even members of minority communities will imbue such perspectives, leading to the reproduction of majoritarian views, narratives, and discourses. In this sense, television becomes a sphere where social values, norms, and opinions are reproduced by reflecting on the values, norms, and opinions of society. If the social

55 Eisenlohr, P. (2011). The anthropology of media and the question of ethnic and religious pluralism. *Social Anthropology*, 19(1), 40-55.

56 Clark, C. (1969). Television and social controls: Some observations on the portrayals of ethnic minorities. *Television Quarterly*, 8(2), 18-22.

57 Chatterji, S. (2004). Media representations of the Kargil War and the Gujarat riots. *Sarai Reader 04: Crisis/Media*, 110-117.

attributes being reproduced belong solely to the majority community and not to religious minorities, news television is discriminatory as is society.

Manufacture of Consent

Though the news media produces round-the-clock coverage on relatively significant issues, it remains a challenge to obtain accurate information pertaining to issues related to religious minorities as the telecasts either exaggerate the language or portray a stereotypical picture of minorities. Stereotypical and biased portrayal is a matter of concern as news media in the postmodern world plays an important role in shaping the fabric of society through production, distribution and redistribution of values and opinions. Hence, television portrayal of minorities as stereotypical will lead to the audience conceptualising the existence of minorities as stereotypical ones, denying the lived experiences and emotions of the religious minorities.

Benedict Anderson, in his important work on nationalism, claimed that print capitalism played a prominent role in creating imagined communities of nations.⁵⁸ Benedict's reference to print capitalism is not to the economic economy of the press. Instead, he refers to the economy of symbols, narratives, and perceptions amongst masses distributed by the press intending to create imagined communities. A similar picture can be conceptualised of the present-day mass media through the lens of Anderson. In the present times, mass media is attempting to create imagined communities at most or mould them by the least. In 2001, five militants drove into the Parliament complex with the alleged intention of blowing up the Indian Parliament. Many news media outlets focused on the Muslim identity of the militants while covering the incident. The news channel "Zee TV" broadcasted a dramatic reconstruction based on the police version. The broadcast alongside the surrounding coverage by reporters developed "the BJP and the RSS' increasingly shrill and violent rhetoric against the Muslim enemy within and without", thereby constructing the Muslim as an enemy unless he proved to be a good Muslim through separation from his religion.⁵⁹ Television has proven to be much more efficient than other

58 Anderson, B. (2006). *Imagined communities: Reflections on the origin and spread of nationalism*. Verso books.

59 Lankala, S. (2017). *Mediated nationalisms and 'Islamic Terror': The articulation of*

mediums in creating imagined communities, particularly the imagined religious minorities. It imbues power in developing narratives and influencing perceptions while igniting “the opinion-building process and impacting the political decisions and audience’s reactions in society.”⁶⁰ Building on the rhetoric of the Muslim enemy, news channels “Republic TV” and “Times Now” have broadcasted unsubstantiated video clips alongside slashed texts on screen in bright red carrying phrases such as “they taught me about jihad,” “taught me to cut off head,” and “was ready to die for Islam” on broadcasts covering Love Jihad,⁶¹ creating imagery of violence to evoke and intensify fear and anger towards Muslims.⁶²

John Zaller’s theory on mass opinion posited masses as groups without a present-at-hand opinion on most issues but when opinions are required, they retrieve all information relating to that issue to produce an opinion. The produced opinion is composed of ideas dominating the information flow at the time.⁶³ Therefore, even if it is argued that the media cannot determine perceptions, they do “structure and select information” used by the masses for producing opinions.⁶⁴ Hence, television broadcasts – such as the aforementioned ones delivering biases and prejudices as news – will manufacture a negative opinion of minorities while a show delivering information in a neutral manner will manufacture a more balanced opinion towards minorities. In this manner, mediums of information become producers of mass opinions.

religious and postcolonial secular nationalisms in India. *Westminster Papers in Communication & Culture*, 3(2).

60 Ahmed, S. (2010). The role of the media during communal riots in India: A study of the 1984 Sikh riots and the 2002 Gujarat riots. *Media Asia*, 37(2), 103-111.

61 Love Jihad, an Islamophobic conspiracy theory developed by Hindu fundamentalists, conceptualizes Muslim men as violent and passionate villains that target Hindu women and marry them in order to forcibly convert them to Islam by seduction, feigning love, deception and kidnapping. The theory is part of another broad conspiracy by Hindu fundamentalists alleging all Muslims of planning to dominate in the world through demographic growth and replacement.

62 Farokhi, Z. (2020). Hindu nationalism, news channels, and “post-truth” Twitter: A case study of “love jihad”. In *Affective Politics of Digital Media* (pp. 226-244). Routledge.

63 Zaller, J. R. (1992). *The nature and origins of mass opinion*. Cambridge university press.

64 Twitchin, J. (1992). *The Black and White Media Book*. Handbook for the Study of Racism and Television. Trentham Books Limited.

Sukumar Muralidharan concluded the same while placing greater significance on the role of mass media in defining, representing, and perpetuating the identity of minorities.⁶⁵ He also conceptualised media, not as a simulation of reality but as an institution manufacturing realities by arguing media's existence as a transmission model was only possible with absolute autonomy, barring which it becomes “a system of meanings that audiences diversely associate themselves with” or “a process of creating shared meanings that... equips people with the vocabulary and the empirical knowledge to engage in a public conversation”.⁶⁶ Indian news channels are not independent. They are loyal to either political parties or media conglomerates.⁶⁷ Hence, Indian news media cannot function as a neutral transmission model as it does not have any autonomy – let alone absolute autonomy.

Traditional media channels demonized the Muslim minority after the anti-Muslim violence of Gujarat, popularly known as the 2002 Gujarat Pogrom, even though Muslims were its victims. The weekly “India Today” magazine – the most widely circulated magazine with a readership of close to 8 million – concluded the carnage as “celebration of the popular will ... shows the right way” in the editorial of its 30th issue.⁶⁸ The editorial defended Gujarat Pogrom as the anger of the Hindu majority, attacked the secularists for demonizing the rampaging Hindu, and concluded by calling the anti-Muslim pogrom, a celebration of popular will. “India Today” would later feature Narendra Modi, one of the main accused in the 2002 Gujarat Pogrom, “as an ahistorical force of nature rather than a cynical manipulator and votary of hate” to celebrate him as an icon instead of holding him accountable for the deplorable persecution of Muslims in Gujarat.⁶⁹

65 Muralidharan, S. (2012). Media, Modernity and Minorities: Subtleties of Exclusion in the 'Public Discourse'. *Social Scientist*, 40(5/6), 19-57.

66 Muralidharan, S. (2012). Media, Modernity and Minorities: Subtleties of Exclusion in the 'Public Discourse'. *Social Scientist*, 40(5/6), 19-57.

67 Alex, R. (2015). The politics of representation in Indian media: implications of the portrayal of Hindus and minority groups (Doctoral dissertation, University of Westminster).

68 More than Modi - Editor's Note News - Issue Date: Dec 30, 2002. (2012, July 10). *India Today*. <https://www.indiatoday.in/magazine/editor-s-note/story/20021230-gujarat-2002-repudiates-the-dead-certainties-of-secularism-793833-2002-12-30>

69 Chatterji, S. (2004). Media representations of the Kargil War and the Gujarat riots. *Sarai Reader 04: Crisis/Media*, 110-117.

The coverage of “India Today” reflects the popular attitude of Indian mass media which is hostile to religious minorities. Moreover, it strongly backs Patrick Eisenlohr, who went a step further than Muralidharan, to claim mass media as a firm manufacturing the idealised nation while subjugating minorities to struggle for representation, often resulting in the prejudiced portrayal of minorities on mass media.⁷⁰ “India Today” indeed embodied the process of manufacturing a Hindu nationalist country dominating its religious minorities.

Ethnic blame

Said argued, “there is a consensus on “Islam” as a kind of scapegoat for everything we do not happen to like about the world’s new political, social, and economic patterns. For the right, Islam represents barbarism; for the left medieval theocracy; for the center, a kind of distasteful exoticism.”⁷¹ All mediums of mass media produce scapegoats. Often these scapegoats are ethnic minorities and the mediums engage in ethnic blame.⁷² Ethnic blame as a discourse frames behaviour of ethnic minorities as problematic and inducing conflict thereby, accentuating the negative image of minority communities. In India, preliminary observation done for the report reflects this consensus of scapegoats is laid at the feet of religious minorities and no medium other than television news perpetuates this consensus in full force with value-laden language, disproportionate weight, and coverage, as well as stereotypes.

Corporatisation of news channels has concentrated the production and distribution of news in the hands of a few companies and conglomerates. To determine ownership of the majority of media houses, research of the Media Ownership Monitor⁷³ was accessed. The top-ranking channels of networking companies – India Today Group, NDTV, Today Network, Times Group and TV 18 are all owned by upper caste Hindus.

The consolidation of ownership of news channels in the Hindu community

70 Eisenlohr, P. (2011). The anthropology of media and the question of ethnic and religious pluralism. *Social Anthropology*, 19(1), 40-55.

71 Said, E. W. (1993). *Culture and imperialism*. New York: Vintage Books.

72 Klein, R. D., & Naccarato, S. (2003). Broadcast news portrayal of minorities: Accuracy in reporting. *American Behavioral Scientist*, 46(12), 1611-1616.

73 (n.d.). Who Owns the Media in India ? <http://india.mom-rsf.org/>

reflects back on newsrooms composed majorly by Hindus, as was proven in a report by Oxfam India and Newslaundry.⁷⁴ The report studied the representation of people from different caste groups in the Indian newsrooms and concluded with the finding that Indian newsrooms are dominated by upper-caste Hindu men. The aforementioned consolidation of ownership and news producers resulted sequentially in the unregulated circulation of majoritarian discourses and interests on news broadcasts. The narrative of ethnic blame also appeals to the television audience, mainly composed of the Hindu community. Consequently, the Hindu community is portrayed favourably while religious minorities are held responsible for all negative aspects of Indian society.

Effect studies

Bryant and Zillmann, in their work on media effects, commented that the media holds the potential to “influence majority group members’ real-world perceptions about minority groups as well as minority group members’ evaluations of self.”⁷⁵ There is consensus amongst academicians on the theory that “ethnic misrepresentation on local television news may result in a belief by viewers that the real world is similar to the television world.”⁷⁶ Television news broadcasts are gradually becoming the real world for television audiences, most of whom had never interacted with minority communities.

“Sandesh”, a Gujarati newspaper in Gujarat on 1st March 2002 reported that two dead bodies of Hindu girls had been found near a pond. It was alleged that they were sexually assaulted during the 2002 Gujarat Pogrom, with veiled accusations at the Muslim community. Police did not substantiate the published report. However, scores of such anti-Muslim reports published by the Gujarati press created an environment of frenzy, fuelling

74 Oxfam India & Newslaundry. (2019, August 2). Who Tells Our Stories Matters: Representation of Marginalised Caste Groups in Indian Newsrooms. Oxfam India. <https://www.oxfamindia.org/knowledgehub/workingpaper/who-tells-our-stories-matters-representation-marginalised-caste-groups-indian-newsrooms>

75 Bryant, J., & Zillmann, D. (Eds.). (2008). Media effects: Advances in theory and research. Taylor & Francis e-Library

76 Klein, R. D., & Naccarato, S. (2003). Broadcast news portrayal of minorities: Accuracy in reporting. *American Behavioral Scientist*, 46(12), 1611-1616.

the need for ‘revenge’ by the Hindus.⁷⁷ When television news delivers a biased depiction of religious minorities in the living rooms of mass audiences, it influences social relationships between majority and minority communities by curating a line of “us” as in the mass audience at one end and “them” as in the religious minorities at the other end. This linear division of “us” and “them” leads to cultivation of racial prejudices for ‘authorised’ groups, creating a hostile environment, susceptible to hate crimes.

Newsrooms have become a metaphor for the nation-state, news studios a site to manufacture consent on behalf of the authorities. This is the propaganda model of communication propounded by Edward S. Herman and Noam Chomsky.⁷⁸ The model has inbuilt filters to ensure marginalisation of dissent, while allowing the government and dominant private interests to get their messages across to the public. News media is turning into a shadow state, defining agendas and acting as judge and jury on issues of national importance. Set in the conceptualization of Hindutva ideology, it automatically subjugates minorities to marginalisation. A recent study on portrayal of Muslims in media has observed Indian news media to be heavily prejudiced against the Muslim religious minority.⁷⁹

Consequently, it will not be far-fetched to assume Indian news media spawns and sustains a heavy presence of inherent prejudice towards all religious minorities, and conceptualise it as a gargantuan tree with branches entrenched in all corners of the country, perpetuating biases and constructing an impenetrable wall for the subjugation of religious minorities.

Research Methodology

From the conceptual framework, it can be concluded that analysing television news broadcasts required both qualitative and quantitative approaches. Hence, the methodology of content analysis was used to analyse in both a quantitative and a qualitative manner. Content analysis literally refers to an interpretation of content. The method is concerned with drawing

77 Carnage, G. (2002). a report to the nation, an independent fact-finding mission by Dr Kamal Mitra Chenoy. SP Shukla, KS Subramanian, Achin Vanaik.

78 Mullen, A. (2017). The propaganda model after 20 years: Interview with Edward S. Herman and Noam Chomsky. *Westminster Papers in Communication and Culture*, 6(2).

79 Bhat, M. R., Iqbal, K., & Akhtar, S. (2017). Portrayal Of Muslims As Threat To Society By The Media-An Overview In Indian Context. *Int J Innov Res Adv Stud*, 4(7), 450-455.

inferences and conclusions from content.⁸⁰ It was Harold Lasswell who introduced content analysis as a systematic method to study mass media and its usage to propagate propaganda.⁸¹

The research focused on the national television news shows broadcasted during prime time and were easily accessible to the audience, as these are the most important broadcast of a news channel discussing important issues of the day, and are anchored by senior journalists or editors. Shows broadcasted in prime time slots also receive mass audiences, i.e. the maximum number of viewers and TRP of the day.

The research methodology was developed with the objective of studying the portrayal of minorities in television news broadcasts. To perform data collection and sampling, prime-time news broadcasts of three news channels were selected for analysis. The channels “India Today”, “Aaj Tak (Till Now)” and “NDTV” were selected as each channel is a popular news channel, receives high viewership, and caters to a niche audience. The purpose of selecting three channels with different targeted audiences was to avoid one-dimensional depiction of minority representation and minority portrayal on television news. The prime time broadcasts of selected channels involved a handful of news broadcasts, including news bulletins. The most popular prime-time broadcast of each channel was selected. These were respectively, Newstrack of “India Today” channel, anchored by Rahul Kanwal; Taal Thok Ke of “Aaj Tak” channel, anchored by Anjana Om Kashyap; and Ravish Ki Report of “NDTV” channel, anchored by Ravish Kumar.

After selecting the news channels and the broadcast shows, sampling was restricted to discussion broadcasts involving panellists. The time frame of the sampling was from 01.01.2021 and ended on 31.12.2021 and was restricted to the prime-time slot between 7 pm and 11 pm. In the first stage, data collected from each show was recorded in a master sheet and in the second stage, further analytical categories were defined and added for refining collected data in a separate master sheet for each program.

The first stage consisted of categorising broadcasts from 01.01.2021 -

80 Nachmias, D., & Nachmias, C. (1976). *Research methods in the social sciences*.

81 Janowitz, M. (1968). Harold D. Lasswell's contribution to content analysis. *The Public Opinion Quarterly*, 32(4), 646-653.

31.12.2021 by the date of broadcast, title of the broadcast, mention of minorities and religion in the broadcast, number of panellists, as well as the name and profession of each panellist. The second stage consisted of individually analysing each broadcast by type of topic covered, editorial questions of anchors, presence of minority representatives, the background of minority representatives, as well as presence or absence of evidence suggesting the targeting of minority groups. The broadcasts relating to religious minorities were further classified as positive, negative, or neutral in the second stage. The classification of positive, negative or neutral was done in accordance with themes and language used in the broadcast for religious minorities.

Positive News: The stories in which issues related to minority affairs were projected in a positive way. The stories/coverage of minorities which depict the development and positive changes in their political, economic, and social sector, promotion of peace and harmony, and involvement in the accords/ agreements leading to peace and prosperity with other religious communities were coded as positive.

Negative News: Stories related to religious minorities which reflect social strife, natural and human steered deaths and destruction, political instability, catastrophic, chaos and anarchy, shabby living conditions, criminal and immoral act, and political, economic and social intrastate and interstate conflicts and disputes were coded as negative.

Neutral News: The stories that carry no emphasis on either positive or negative aspects of the minority's economic, political and social life were coded as neutral.

It is easier to make an authoritative claim on the representation of minorities on television by analysing it in the context of the population of religious minorities. Hence, the collected data will also be used to compare the representation of minorities with the actual population figures.

The units of analysis for this study are: title of the broadcast, categorical topic of broadcast, anchoring, and panellists. Labels used for coding data included the following:

0 = No

1 = Yes

m = Muslim

s = Sikh

c = Christian

z = Neutral

n = Negative

p = Positive

Data Analysis

The research study analysed prime time broadcast shows of three news channels: Halla Bol of “Aaj Tak” channel, Newstrack with Rahul Kanwal of “India Today” channel and Ravish Ki Report of “NDTV” channel. From January 2021 to December 2021, the three broadcasts telecasted 793 shows in which 2,574 panellists participated. As the data collected from the three broadcasts varied widely in analysis, the findings have been demarcated in three parts, with each part corresponding to one broadcast show.

Halla Bol, “Aaj Tak”

“Aaj Tak” was selected as it received high TRP, was the first news channel to broadcast 24/7, and has a stronghold in the audience of the Hindustani-speaking population as the most trusted news channel. As the news channel was the first to run on the bogey of sensationalism in order to gain higher ratings, it is often branded as the gatekeeper of majoritarian Hinduism. The prime-time broadcast show Halla Bol of “Aaj Tak”, anchored by Senior Executive Editor Anjana Om Kashyap, telecasted 314 shows in the year 2021.

Though 127 (40.44%) telecasts featured panellists from religious minorities, only 2 (0.63%) of these telecasts focused on issues related to religious minorities. The two broadcasts related to religious minorities did not focus on issues pertaining to religious minorities. Instead, one of the broadcasts focused on the entry of the political party All India Majlis-E-Ittehadul

Muslimeen⁸² (AIMIM) in the 2021 state legislative elections of West Bengal. The broadcast portrayed AIMIM to be contesting elections in order to split the Muslim vote, benefitting BJP. A journalist of the news channel mentioned that AIMIM holds an anticipated sway over the Muslim vote bank in Bengal. The panellists repeatedly insinuated AIMIM was doing politics of religion, wanting to perpetuate polarisation and cut into the vote share of other contesting parties to help BJP. A panelist termed AIMIM as another Muslim league perpetuating politics of partition while another panelist opined all participation of AIMIM was dangerous for Indian nationalism and politics. None of the panellists were rebuked, censored or criticised for being derogatory towards a politician merely because he belonged to a religious minority. There was also a comment labelling “Al-lahu Akbar” as a violent slogan of violence.

The other broadcast focused on the “racket” of religious conversion by Muslim clerics as a conspiracy by religious organisations and foreign sources of middle eastern countries funding NGOs in India. It used a clip from a lecture of a Muslim cleric talking about how he inspired his friend to convert to Islam, alleging the conversion to be forceful. The broadcast used another clip of a woman claiming she was forcefully married by her father to a Muslim man. It also claimed about 350 women were converted to Islam without evidence. One of the panelists called a Muslim cleric a terrorist, while another alleged UP was infested by Pakistanis working to convert Hindus into Islam. The broadcast itself changed its title from Dharm Ke Naam Par Dhandha (Business in the garb of religion) to Dharmantran ka Khal Naik (Villain of religious conversion) – the latter title is a word-play on Zakir Naik, who is an Indian Islamic televangelist and a

82 All India Majlis-E-Ittehadul Muslimeen (AIMIM) is a political party based in Hyderabad and headed by Asaduddin Owaisi. It was founded as Majlis-e-Ittehadul Muslimeen (MIM) in 1927 to resist the merger of the princely state of Hyderabad with India and carve out a “South Pakistan” from Hyderabad. After India annexed Hyderabad through Operation Polo – a ‘police action’ disproportionately targeting Muslims and leading to 2,00,000 casualties, the Indian state banned MIM. Qasim Rizvi, the last elected head of MIM handed over its responsibility to Abdul Waheed Owaisi, who fashioned MIM into AIMIM and shifted from a hardline policy of independence to one of pragmatic direction. Today, the party promoting effective development and representation of Indian Muslims has expanded to several states but continues to be mired in controversies. The right-wing Hindutva groups label it as a radical Islamist platform, while the Congress and other centrist organizations accuse the party of having a tacit agreement with the BJP to perpetuate polarisation for electoral gains.

wanted fugitive in India for allegedly making inflammatory speeches and laundering money.

Topics discussed in prime-time debates represent important issues concerning the nation. In 2021, Muslims were incarcerated for “performing” Covid Jihad.⁸³ Hindutva groups made calls for a pan-nation genocide and boycott of Muslims, leading to a spike in hate crimes targeting the religious minority. Sikhs were accused of conspiring with Pakistan. Hindutva groups alleging Christians of forcible conversion targeted the religious minority with hate crimes, including vandalism of schools and Churches. The Indian Ministry of Home Affairs restricted Missionaries of Charity – the organisation founded by Mother Teresa, from receiving foreign donations on account of alleged proselytism. However, the newsroom of Halla Bol felt only 2 issues related to religious minorities were vexatious enough to be addressed in the prime-time show of the channel, and none of them addressed the concerns of religious minorities.

The Reference here stands for the content of a broadcast directly mentioning the religious minorities. In 2021, Halla Bol referred to religious minorities in 60 (19.01%) telecasts. The show referred to Muslims in 59 (18.78%) of telecasts, Sikhs in 1 (0.31%) telecasts, and made no direct reference to Christians, depriving space of a religious minority comprising 2.3% of total population of India. The presence of references corresponds directly to the topic of the broadcast; if the topic includes mention of Sikhs, aspects of the topic are related to the Sikh community. The number of references is almost a 3,000% increase to the number of topics related to minorities, representing the framing of telecasts to be majoritarian in nature with a strict modulation to avoid any association with minority identity. Deliberate avoidance of any association with religious minorities reflects on the majoritarian mindset of the newsrooms.

Overall in the year 2021, Halla Bol telecasted 60 (19.10%) shows referring to religious minorities. 57 (95%) of these were negative in nature and 3 (5%) were neutral. All references to Sikhs were negative in nature, while 56 (94.91%) of references made to Muslims were negative and the

83 Zaffar, H., & Abdulla, S. (2021, March 25). Tablighi Jamaat men India held for 'spreading COVID' share ordeal. Al Jazeera. <https://www.aljazeera.com/news/2021/3/25/tablighi-jamaat-members-held-for-spreading-covid-stuck-in-india>

remaining 3 (5.08%) references to Muslims were neutral. The show did not refer to any religious minority in a positive manner. The negative references consisted of stereotypes and prejudices of the majoritarian Hindu community towards religious minorities. The overwhelming amount of negative references and absolute absence of positive references not only insinuates the presence of a prejudiced and intolerant attitude towards religious minorities but also the perpetuation of these prejudices, intolerance and stereotypes by the newsroom, which repeatedly refused to object to or censor the expression of the biases on the prime time show. Absence of such censorship results in normalising the biases in everyday conversation for television viewers numbering millions.

The show broadcasted 5 (1.59%) telecasts related to conspiracy theories against religious minorities. All the conspiracies were against the religious minority of Muslims. Conspiracy theories pertaining to religious minorities are an amalgamation of stereotypes, prejudices and majoritarian fears. The conspiracy theory of “Population Jihad” overarches over four conspiracy theories telecasted on the show.

The show also broadcasted 14 telecasts targeting religious minorities. 12 (85.71%) of these telecasts targeted Muslims, and 2 (14.28%) targeted Sikhs. Targeting refers to media trials conducted in the newsrooms by anchors and Hindu panellists, which deprive the wrongfully accused to present their defence. Panellists from religious communities are often invited but not allowed to air their explanations, instead, they are presented as a punching bag for other panellists and sometimes, for the anchor as well.

1286 panellists appeared in 127 broadcasted telecasts of Halla Bol. Only 192 (14.93%) of the panellists belonged to religious minorities, with 147 (11.43%) representing Muslims, 45 (3.49%) representing Sikhs and 0% representing Christians. In proportion with the population of religious minorities, only Sikhs were adequately represented; Muslims and Christians were excessively underrepresented.

Even in the pool of 45 Sikh panellists, 31 (68.88%) were representatives of political parties and 14 (31.11%) were independent, the underlying representation of Sikh was delimited by ideological lines or party politics instead of representing the interests and concerns of the community. This pattern was also present in the panellists representing the religious minori-

ty of Muslims. Only 48 (32.65%) of Muslim panelists were independent and 99 (67.34%) represented political parties. Panellists belonging to religious minorities and representing political parties are at the convergence of two polar opposite interests, with exception of a handful of political parties like AIMIM claiming to represent religious minorities. Hence if a person is representing a political party, the expression of views will be in line with party rhetoric albeit with a token minority face and the rhetoric is seldom concerned with the concerns of religious minorities.

Newstrack, “India Today”

“India Today” was selected as it is the sister channel of “Aaj Tak”, with the purview of depicting the difference between the treatment of English and Hindi audiences despite being owned by the same company. It must be contextualised that “Hindi television news has shown a greater tendency to sensationalise in order to gain more television rating points than the English television news channels” as the audience of English news channels across India tend to be more educated.⁸⁴ If “Aaj Tak” is the gatekeeper of Hindu majoritarianism, “India Today” is its assistant. In a nutshell, “India Today” is a diluted version of the “Aaj Tak”, selling the same content but in a savvier manner through liberated language to its english educated audience. The prime time broadcast show Newstrack of “India Today” channel, anchored by News Director Rahul Kanwal, telecasted 230 shows in the year 2021.

92 (40%) of the telecasts had panellists from religious minorities but only 1 (0.43%) telecast focused on topics related to religious minorities. However, Newstrack – exhibiting the same treatment of issues related to religious minorities as its sister broadcast show Halla Bol– covered only one issue related to religious minorities thereby, reflecting the domination of a majoritarian mindset in the newsroom. The one broadcast related to religious minorities was an interview of Mahmood Madani, a Muslim religious leader and head of Darul Uloom Deoband.⁸⁵ It was also one of the

84 Alex, R. (2015). The politics of representation in Indian media: implications of the portrayal of Hindus and minority groups (Doctoral dissertation, University of Westminster).

85 Darul Uloom Deoband is an Islamic seminary in India at which the Sunni Deobandi Islamic movement began. It is located in Deoband, a town in Saharanpur district, Uttar Pradesh. It is a renowned religious and academic centre in the Islamic world. In the In-

neutral references to the religious minorities in the show. Conducted by Rahul Kanwal, the broadcast established that the Taliban emerged from the Darul Uloom Deoband and continuously underpinned an insinuated relationship between the Taliban and Darul Uloom. The language of the interview pressured Mamdani to denounce any relation between Darul Uloom with Taliban; the entire interview was continuously embedded with pictures and videos of Taliban and Afghanistan, with a glaring lack of audio-visual content pertaining to Darul Uloom Deoband.

The show directly referred to Muslims in 35 (15.21%) of telecasts, Sikhs in 2 (0.86%) telecasts, and made no direct reference to Christians, following the pattern observed in data from the broadcast show of Halla Bol and depriving space to the Christian religious minority comprising 2.3% of the total population of India. As aforementioned in the analysis of Halla Bol, reference refers to the content of a broadcast directly mentioning any of the religious minorities during the telecast and presence of references corresponds directly to the topic of the broadcast, representing aspects of the topic to be related to religious minorities. The number of references is almost a 4000% increase in the number of topics related to minorities. While the increase is more than that of Halla Bol, it must be underlined that this increase represents the unwillingness to associate the show with religious minorities and be more majoritarian in appearance, nature and identity. Newstrack is 4000% unwilling to label itself as a space accommodative of religious minorities.

In the year 2021, Newstrack telecasted 37 (16.08%) shows referring to religious minorities, of which 34 (91.89%) were negative in nature, 2 (5.40%) were neutral in nature and 1 (2.70%) was positive. All references to Sikhs were negative in nature again following the pattern observed in telecasts of Halla Bol, while 32 (91.42%) of references made to Muslims were negative, 2 (5.71%) were neutral and the remaining 1 (2.85%) reference was positive. As the diluted version of Halla Bol was confronted by educated viewership, Newstrack had to improvise and included two neutral telecasts and one positive symbolic telecast while diluting the proportion of negative references. The symbolic positive telecast excluded panelists belonging to religious minorities, instead it was an interview

dian sub-continent, it is the largest institution for the dissemination and propagation of Islam and one of the biggest sources of education in the Islamic sciences.

of a retired judge of the apex court, and the interviewee had cursorily mentioned the Muslim minority in a positive light. The negative references reinforced several biases, stereotypes, and prejudices against religious minorities, especially the Muslim and the Sikh community: Muslims as terrorists, Muslims as cunning, population jihad, terrorism jihad, appeasement of Muslims etc. For Sikhs, a similar trope: Sikhs as Khalistani terrorists, foreign funding to support Sikh militancy etc.

The show broadcasted 4 (1.73%) telecasts related to conspiracy theories against religious minorities, 3 (80%) of which were against the religious minority of Muslims, and 1 (20%) was against the religious minority of Sikhs. Conspiracy theories are an amalgamation of stereotypes, prejudices, and majoritarian fears relating to religious minorities, constructing biases against religious minorities that lead to hate crimes. The conspiracy theories are more diverse than those of Halla Bol, which had focused singularly on Muslims. Newstrack telecasted one broadcast, depicting Sikhs protesting against farm laws as installations through FDI (Foreign Destructive Ideology) and insinuating Sikh protesters as ingenuine. On the other hand, Muslims were represented through conspiracy theories related to forced conversion, imposition of sharia law, and religious worship in mosques.

The broadcast of the conspiracy theory on Sikhs began with the announcement of all-out war from the Modi government on Andolan Jeevis,⁸⁶ a derogatory term coined for protesters by the BJP government. PM Modi had given a speech in Lok Sabha, where he termed protesters as Global Propagandists, Andolan Jeevis, FDI's, a Jamaat of Andolan Jeevis,⁸⁷ all Andolan Jeevis as Par Jeevis. The term FDI here refers to the “foreign” involvement of international celebrities like Rihanna, Greta Thunberg, and Meena Harris in the farmers’ movement, who had expressed solidarity with the farmers’ protest on social media platforms, especially on Twitter.⁸⁸ Indian agencies had connected one of these celebrities, pop sing-

86 Perennial protesters, coined to define protesters in a Lok Sabha speech by Prime Minister Narendra Modi.

87 The phrase Jamaat of Andolan Jeevis connotes Muslim religiosity with allegedly problematic elements.

88 Mishra, S. (2021, February 3). Rihanna and Greta Thunberg among international celebrities tweeting support for protesting Indian farmers. *The Independent*. <https://www.independent.co.uk/news/world/asia/rihanna-greta-thunberg-india-farmers-pro>

er Rihanna with Khalistani elements, alleging that Sikhs supporting Khalistani ideology had paid Rihanna and probably other celebrities as well to raise this issue on Twitter.⁸⁹ In line with Modi's stance,⁹⁰ the broadcast termed the solidarity of celebrities with Sikh protesters as an organised bandwagon aimed at defiling India and did not give any benefit of the doubt to the celebrities' solidarity as genuine and organic. Instead, the content of the broadcast repeatedly tried to establish the existence of an organised effort at international level aimed at defiling the Modi government even depending on a commercial in support of farmers protest run during Super Bowl, claiming the ad must have required crores of rupees to run. The broadcast also made an unsubstantiated and theorised claim that elements owing allegiance to Khalistani ideology are lobbying in Canada and other countries to mobilise support for the farmers' movement. Such content broadcasted to millions of Indians, is an attempt to criminalise all Sikh farmer protesters in a generalised manner.

The show also broadcasted 8 telecasts targeting religious minorities. 7 (87.50%) of these telecasts targeted Muslims, and the remaining 1 (12.50%) targeted Sikhs. As aforementioned, targeting refers to media trials conducted in the newsrooms by anchors and Hindu panellists, which deprive the wrongfully accused to present their defence. Representatives from religious communities are invited not as panellists but as punching bags.

A total of 946 panellists appeared in 230 broadcasted telecasts of Newstrack. Only 151 (15.96%) of the panellists belonged to religious minorities, with 95 (10.04%) representing Muslims, 34 (3.59%) representing Christians and 22 (2.32%) representing Sikhs. According to the 2011 population census, 14.2% Muslims, 2.3% Christians and 1.7% Sikhs are from the Indian population. With the overrepresentation of Christians and Sikhs, Muslims became the exception and were underrepresented by ap-

test-b1796895.html

89 Bhardwaj, A., Pandey, N., & Basu, N. (2021, February 4). Canada firm, MP, PR person suspected for farmers protest toolkit tweeted by Greta Thunberg. ThePrint. <https://theprint.in/diplomacy/canada-firm-mp-pr-person-suspected-for-farmers-protest-toolkit-tweeted-by-greta-thunberg/599098/>

90 In a speech in Lok Sabha, Narendra Modi had labelled support from international celebrities as a propaganda and ideology organised by protestors aimed at destroying the Indian nation-state.

proximately 4%.

66 (69.47%) Muslim panelists were independent and 29 (30.52%) represented political parties. 27 (79.41%) Christian panellists were independent and the remaining 7 (20.58%) represented political parties. 12 (54.54%) Sikh panellists were independent and the remaining 10 (45.45%) represented political parties. Unlike Halla Bol, Newstrack allowed for greater representation of panellists from religious minorities independent of political parties.

Prime Time with Ravish, “NDTV”

“NDTV” was selected for analysis as it has been perceived as a credible channel known for delivering news in a neutral manner, largely due to the fact that it has been credited for defying the government monopoly over television news broadcasts in India.⁹¹ The prime time broadcast show Prime Time with Ravish of “NDTV”, anchored by Senior Executive Editor Ravish Kumar, telecasted 249 shows in the year 2021.

Only 53 (21%) of the telecasts featured panellists from religious minorities and not one telecast focused on issues pertaining to religious minorities. The show referred to Muslims in 22 (8.83%) of telecasts, Sikhs in 1 (0.40%) telecasts, and made no direct reference to Christians, depriving space to a religious minority comprising 2.3% of the total population of India while following a trend observed in the broadcast show Halla Bol. The references were slightly better with just about an increase of 2200% in the number of topics related to minorities, but in numbers the increase is 23 shows from 0 shows. Prime Time with Ravish is one of the few shows that do not invite panellists for discussions but maintains a news bulletin with Kumar speaking majority of the time, with a few bytes given by experts. Here, the control of modus operandi is in the hands of the anchor who could include the religious minorities, but the data suggests that does not happen. The show seems to withhold from accommodating religious minorities facing one of the worst spells of persecution.

In 2021, Prime Time with Ravish Kumar telecasted 23 (9.23%) shows referring to religious minorities: 4 (1.60%) were positive in nature and 19

91 Romano, A. R., & Bromley, M. (Eds.). (2005). *Journalism and democracy in Asia* (pp. 1-205). London: Routledge.

(7.63%) were neutral. The single reference to Sikhs was positive in nature while out of 22 references made to Muslims, 19 were neutral and the remaining 3 were positive.

One of the neutral references to Muslims includes the broadcast on the death of Moinul Haque during an anti-encroachment drive in Assam.⁹² In the broadcast, Ravish equates the death of Haque with the custodial death of Manish Gupta, a Hindu belonging to a dominant caste, based on the involvement of police in both deaths. The broadcast telecasted more than 7 minutes of content related to Gupta – more than triple the time allotted to Haque – which was enriched and laden with interviews of his wife, byte of police authorities and locally shot footage. On the other hand, content related to Haque was limited to the video that had gone viral on social media, capturing policemen and the cameraman assaulting Haque. The broadcast had focused more on Gupta's death than on Haque's, going as far as to suggest those who did not mourn Haque should mourn Gupta. Kumar seemed more concerned about the existence of a communal divide on religious lines in his audience than about these deaths, as the broadcast focused on the response of the audience to these deaths and the lack of outrage cutting across the communal divide. In essence, the broadcast addressed the audience to not be selective in their outrage over both cases because of religious identity even as it did the same. The broadcast neither refers to the presence of institutional bias against religious minorities – especially Muslims – in the Indian police force due to inherent prejudice, political power and administrative authority nor to the historical instances of the Indian police disproportionately targeting Muslims. Kumar, while requesting the audience to be united in outrage against the police, himself became selective on religious lines through the framing, portrayal and

92 800 families were evicted from Muslim dominated local settlements of Dholpur and Gorukhti villages. Police attacked Moinul Haque when locals including Haque resisted the anti-encroachment drive, demanding adequate rehabilitation and a time period to move from the settlements. Policemen shot bullets at Haque and proceeded to attack his body with batons after he fell down being shot in the chest. After the police dispersed, Bijay Shankae Baniya – a government cameraman jumped on Haque's body. In response, Haque's body twitched – he was still alive. Baniya proceeded to assault Haque until a red stain appeared on his chest. Baniya was eventually escorted off by the police but no medical aid was provided to Haque. Haque died. The incident was covered in a perfunctory manner by the mainstream news media after a video capturing the death and physical assault went viral on social media. Locals had refused to accept the dead body until suitable compensation was received.

language of the broadcast.

342 panellists appeared in 249 broadcasted telecasts of Ravish Ki Report. Only 59 (17%) panellists belonged to religious minorities, with 49 (14.32%) of total panellists representing Muslims, 7 (2.04%) representing Sikhs and 3 (0.87%) representing Christians. According to the 2011 population census, 14.2% Muslims, 2.3% Christians and 1.7% Sikhs form 18.2% of the Indian populace. Christians have been underrepresented while Muslims and Sikhs were adequately represented by a handful of decimals. At least, Prime Time with Ravish allowed for representation of panellists from religious minorities independent of political parties. Amongst 49 Muslim panelists, 46 (93.87%) were independent and 3 (6.12%) represented political parties. 5 (71.42%) of 7 Sikh panellists were independent, and the remaining 2 (28.57%) represented political parties. All the 3 Christian panellists were independent.

Though Ravish Ki Report provided adequate space for the representation of religious minorities excluding Christians in panels, the airtime provided to minorities is approximately half of what is provided in the other two shows. Ravish Ki Report only featured panellists from religious minorities in 21% of shows. Generously assuming all panellists are allowed to speak for 10 minutes each, this averages to almost 9 hours of on-air time. In comparison, the other two news shows i.e. Halla Bol and Newstrack featured minority panellists in 40.44% and 40% of their broadcasts respectively, doubling the on-air time for religious minorities.

Conclusion

In the purview of television as a medium of imparting information, moulding public opinion and reflecting society, it can be safely implied that television has provided representation to religious minorities, but the representation is tokenist and not effective in mechanism.

Each show failed to provide adequate representation to all religious minorities in proportion to their population. Though at least one minority community received proportionate representation in each show, effort must be made to gain adequate representation in all panels, not just paltry of them. 88.30% of panellists from religious minorities represented political parties across the three shows, suggesting an association on political

lines. Two of the news shows telecasted broadcasts referring to religious minorities in a negative manner. None of the shows dedicated more than two broadcasts on covering issues of religious minorities, with Ravish Ki Report not doing even that. Only Newstrack and Halla Bol telecasted broadcasts airing conspiracy theories against religious minorities. Distillation of conspiracy theories, deliberate targeting and prejudices by the television news amongst mass audiences results in the construction and perpetuation of biases and prejudices that lay foreground for hate crimes against religious minorities.

In essence, news television avoids effective coverage of religious minorities as a subject and provides only tokenism representation to religious minorities in newsrooms. This research provides empirical data sourced from 793 telecasts and 2,574 panellists of three prime-time news shows in support of assertions claiming Indian television news acts with religious minorities in a prejudiced manner with inherent partiality towards the Hindu majority. Hindu nationalism is the unofficial line of the right-wing government, which Modi and his corporate allies are negotiating, bullying and strangulating the news media in endorsing. Hence, the institution of Indian television news functions every day by at best ignoring Muslims, Sikhs and Christians and at worst, defaming the said communities. If the Hindu community continues to believe the religious minorities as negative elements because of the unregulated portrayal of minorities in a prejudiced manner on television news broadcasts, it will vastly increase hatred as well as hate crimes against religious minorities and mould India as a more dangerous nation for religious minorities.

Journalism as Hitjob: A Comparative Analysis of how Muslims, Sikhs and Christians are reported in Indian Newspapers

Sharjeel Usmani, Mehwish Asim and
Mohd Kamran

After independence when India decided to be a democratic nation, the question of the need for separate provision for the press arose.¹ Dr. B.R. Ambedkar, the chairman of the Drafting Committee of the Constitution of India, made an important remark in this context. He remarked “The press is simply another way of describing a citizen or an individual. The media have no superior privileges which are not to be given or which are not to be exercised by the voter in his separate capacity. The executive of the press or the editor are all citizens and therefore when they select to write in a newspaper, they are just exercising their right of freedom of speech and expression and in my decision then no special mention is necessary of the freedom of press at all.”² Hence, the freedom of press was placed in freedom of speech and expression in the article 19(1) (a) of the Indian constitution making free press the heart and soul of Indian democracy.

Media plays a crucial role in creating public opinion. The media shapes public opinion by controlling what people hear and read. The media is an important initiator of several issues and matters of national discourse. Dainik Jagran, the largest Indian newspaper in any language, in terms of circulation, refrained from publishing the infamous Hathras rape case in 2020. According to media watchdog NewsLaundry, despite the harrowing case of gang rape of a Dalit minor by upper caste men being the central subject of discussion in the country, Dainik Jagran did not report on the case for two weeks.³

History of print media in India can be traced back to 1780 when the first newspaper of India, ‘The Bengal Gazette’ was published. Print media played an important role during the pre-independence period wherein political leaders used newspapers, journals and magazines to encourage people to join the freedom movement.⁴ During the pre-independence era the

1 Mir, M. A. (2019). The Role of Media in Indian Democracy. IJRAR-International Journal of Research and Analytical Reviews (IJRAR), 6(1), 584-588.

2 Constituent Assembly Debates On 2 December, 1948 Part I. (n.d.). Indian Kanoon. <https://indiankanoon.org/doc/1389880/>

3 David, S. (2020, October 1). How Dainik Jagran and TOI's Lucknow editions ignored the Hathras rape. NewsLaundry. <https://www.newslaundry.com/2020/10/01/how-dainik-jagran-and-tois-lucknow-editions-ignored-the-hathras-rape>

4 Shareef, S. M. (2021). The Contribution of Journalism and Communication towards the attainment of Indian Independence – A Critical Review. International

influence of newspapers was not restricted to cities but it also reached remote parts of the country. Importance was given to Indian languages so that common people could join the movement. The major objective of newspapers during that time was to not make a profit but to serve the general public. Newspapers scrutinised government acts and policies and acted as an institution of opposition to the government.⁵ Maulana Abul Kalam Azad, arguably India's one of the tallest independence leaders, started the weekly newspaper *Al-Hilal* from Calcutta in 1912 with intentions to develop a new awakening amongst Muslim religious class. In the earlier editions of his paper, he wrote, "We are not here to make profit but to search for loss and hardship."⁶ In the coming years, he would call for 'Jihad' against the Britishers in the same paper.⁷

However, post-independence, the print media went through a phenomenal change. The number of newspapers went up and so did their circulation. This also gave rise to stiff competition amongst newspapers. According to the Registrar of Newspapers for India (RNI), as of 2020-21, 9750 dailies are being published in the country. Hindi dailies accounted for 4349 with the circulation of 10,36,19,621 copies and English dailies accounted for 820.⁸ According to the data released by the Indian readership survey⁹ (IRS) in 2019 for Q4, 36% of the respondents' read newspapers in the last month. In rural areas, this number was 29% while in urban areas it was 50%. This was happening at a time when circulation in other parts of the world was continuously declining with the coming of television and news media. The average daily circulation of newspapers in the United States of America has been declining at 6 percent a year.¹⁰ However, newspaper

Journal of Media, Journalism and Mass Communications, 7(2), 01-04. <https://doi.org/10.20431/2454-9479.0702001>

5 Rahman, Z. T., & Rahman, R. J. (2018). An Analytical Study on Indian Freedom Movement and Nationalist Journalism. *International Research Journal of Management Sociology & Humanity*, 9(8), 84-96.

6 Ahmed Rizwan (paper), *Biswin Sadi Mein Urdu Sahafat (1901-1947 AD)*, Aajkal Aur Sahafat, Nov-Dec 1983 Rizwan, A. (1983, Nov-Dec). *Biswin Sadi Mein Urdu Sahafat*. Aajkal Aur Sahafat.

7 Ibid, pg. 54

8 http://rni.nic.in/pdf_file/pin2020_21/pin2020_21_eng/Chapter%201.pdf

9 INDIAN READERSHIP SURVEY 2019 Q4. (2020, May 8). Media Research Users Council India. <https://mruc.net/uploads/posts/cd072cdc13d2fe48ac660374d0c22a5d.pdf>

10 Edmonds, R., Rosenstiel, T., & Mitchell, A. (2010). *The Project for Excellence in Jour-*

circulation in India has almost doubled in the past two decades. With the wide reach of print media in India, the impact and consequences it has on its readers is significant.

Modern-day reporting however has become questionable. Justice G.N Ray remarked that, “One of the most controversial issues in modern reporting in media is bias especially on political issues and on cultural and other issues too. Sensationalism is also a common complaint. Minor factual errors, if not corrected, sometimes may pose bigger problems as well.”¹¹ Dr. Arvind Kumar Singh notes that corporatization, monopoly, corruption, media trials and advertising office are some negative trends observed in the Indian newspaper market. Maximum big media is now controlled by corporate houses who treat print media as commercial enterprises with the objective of earning profits.¹²

As per the 2011 Census, religious minorities in India constitute around 19.3% of the total population. Muslims are the largest minority in India that constitute 14.2% of the total population, whereas Christians and Sikhs constitute 2.3% and 1.7% respectively.¹³ In India where the majority of the people rely on print media for daily news consumption, it thus creates a significant impact in shaping the minds of the people. In January 2018, rape of an 8 year old girl, Asifa in Kathua district of Jammu and Kashmir shook the nation. Sunday guardian, an Indian Sunday newspaper published a story titled “anatomy of concoction”, with the names of real victims and accused claiming that the girl wasn’t raped but was murdered by her relatives.¹⁴ What makes it even worse is the fact that articles labelled the story

nalism: State of the News Media, 2011.

11 Address by Mr. Justice G.N. Ray, Chairman, Press Council of India at the inaugural session of National Press Day on November 16, 2009 organised by the Press Council of India in collaboration with Government of Andhra Pradesh and AP Press Academy at Jubilee Hall, Public Gardens, Hyderabad. The Changing Face Of Indian Media. (n.d.). Press Council of India. <https://www.presscouncil.nic.in/OldWebsite/speechpdf/November%2016%202009%20Hyderabad.pdf>

12 Singh, A. K. (2014). Present Trends of Newspapers in India (A qualitative study). *Shodh Sanchayan*, 5 (1), 1, 5.

13 https://censusindia.gov.in/census_and_you/religion.aspx

14 Pandit, S. (2018, April 14). Anatomy of a Concoction* - The Sunday Guardian Live. Sunday Guardian. <https://www.sundayguardianlive.com/opinion/anatomy-of-a-concoction>

as the one ‘based on fiction’ at the end of the article while many people might have already believed the story to be a real one.

Role of print media in creating public opinion

People are often influenced by the media directly or indirectly to support a particular ideology or political party.¹⁵ There are some theories in connection with the influence of the news media on creating public opinion. One such theory that fits the Indian context very well is the agenda-setting theory. Agenda setting theory suggests that the news media set an ‘agenda’ where they would not tell the public what to think but they might tell them what to think about. The theory was put forward by Donald Shaw and Maxwell McCombs and in their work they mentioned, “In choosing and displaying news, editors, newsroom staff, and broadcasters play an important part in shaping political reality. Readers learn not only about a given issue but also how much importance to attach to that issue from the amount of information in a news story and its position. In reflecting what candidates are saying during a campaign, the mass media may well determine the important issues—that is, the media may set the “agenda” of the campaign.”¹⁶

What the media portrays influences the public deeply. The way the media gives importance to certain issues indicates the seriousness of the issue. Any issue or story that will get more coverage will be taken by the public as more relevant as compared to the story that is given less space in the newspapers. In March 2020, Tablighi Jamaat members gathered for the annual congregation from 13th to 15th of the month, before the Indian government announced any measures related to covid-19. In fact, the health ministry on 13th March, 2020 announced that COVID-19 was not a health emergency.¹⁷ Indian media vilified Tablighi jamaat by making false conspiracy theories and labelling as ‘corona jihadis’, ‘terrorists’ and ‘hu-

15 Paul, V., Singh, P., & John, S. B. (2013). Role of mass media in social awareness. *Humanities & Social Sciences Reviews*, 1(1), 34-38.

16 McCombs, M. E., & Shaw, D. L. (1972). The agenda-setting function of mass media. *Public opinion quarterly*, 36(2), 176-187. <https://doi.org/10.1086/267990>

17 PTI. (2020, March 13). Coronavirus | COVID-19 is not health emergency, no need to panic: Health Ministry. *The Hindu*. <https://www.thehindu.com/news/national/coronavirus-outbreak-union-health-ministry-press-conference-in-new-delhi/article31061163.ece>

man bombs.’ However, things did not stop there Dainik Jagran published a piece that proclaimed that the country isn’t aware of the agenda of Tablighi Jamaat. The report claimed that the mission of the Jamaat is to separate Hindus and Muslims.¹⁸ The Supreme Court of India later slammed the biased reporting in the Tablighi Jamaat case however an irreparable damage was done by that time.¹⁹ Social media was filled with fake news and hashtags like #CoronaBombsTablighi and #MuslimMeaningTerrorist were trending. Tablighi Jamaat members were also falsely accused of spitting in food to spread the virus, urinating and defecating in quarantine centres.²⁰ All this led to serious on ground repercussions, a pregnant and bleeding Muslim woman was accused of spreading the virus in Jamshedpur hospital, she was even asked to clean the hospital floors. The woman lost her child.²¹ Attacks on Muslims in the name of COVID-19 increased severely.²²

Research Methodology

The amount and type of information presented in the media is a critical factor in determining how a community or a group is perceived by the general public, and this has an impact on their public image. As a result, it was logical to use content analysis as the research methodology to investigate the portrayal of religious minorities in India in the various English and Hindi newspapers that were chosen for this study.

Content analysis is considered as being one of the most authentic methods

18 Singh, B. (2020, April 14). तब्लीगी जमात के एजेंडे से अनजान देश, इसका उद्देश्य है मुसलमानों को पक्का मुसलमान बनाना. Jagran. <https://www.jagran.com/editorial/apni-baat-country-unaware-agenda-of-tablighi-jamaat-20188710.html>

19 Mathur, A. (2021, September 2). Everything is communalised: SC slams biased reporting in Tablighi Jamaat case. India Today. <https://www.Indiatoday.in/law/story/supreme-court-communal-reports-media-tablighi-jamaat-coronavirus-1848329-2021-09-02>

20 Khan, A. (2022). Identity as crime: How Indian mainstream media’s coverage demonised Muslims as coronavirus spreaders. *Pandemic and Crisis Discourse: Communicating COVID-19 and Public Health Strategy*, 355.

21 Angad, A. (2020, April 19). In Jharkhand, a pregnant woman says told to clean up blood, loses child. Indian Express. <https://indianexpress.com/article/India/in-jharkhand-pregnant-woman-says-told-to-clean-up-blood-loses-child-6368865/>

22 <https://www.thequint.com/news/India/coronavirus-Muslims-attacked-covid19-karnataka-haryana#read-more>

of quantifying and investigating the content of print media, and as a result, it is widely used in the field of image-related analysis. It is important to note that content analysis is fundamentally an organised and systematic procedure, as defined by Walizer and Wiener (1978), who state, "It is a systematic procedure designed to examine the content of recorded information."

Typically, content analysis tends to happen whenever someone reads a body of communication content, and summarises and interprets what they have read, according to Berelson (1952). Berelson went on to argue that content analysis can be divided into two categories: "What is said?" and "How is it said?"

When it comes to the current study, the researcher has applied these two categories. When it comes to the presentation of news pertaining to religious minorities in India by selected mainstream newspapers in India, "What is said" refers to the amount of space that is taken up by the news. "How it is said" in terms of what type of tone the selected mainstream dailies of India used to cover religious minorities of India.

Overall, the study made extensive use of the quantitative method of content analysis, which focused on analysing the nature of the content along three broad qualitative dimensions: positive, negative, and neutral. The Indian Express and Dainik Jagran were the two mainstream dailies in India chosen for the study, and the study was conducted over the course of the year 2021, from 1st January to 31st December. Secondary sources, such as official government data, reports, and a literature review, were also used to support the findings of the study. Dainik Jagran and Indian Express are two of the oldest newspapers in India, predating their inception before independence in 1947 and 1932, respectively.

The content analysis takes into account the frequency of occurrences and results in the quantification of the data, which also paves the way for sound decision-making in the future. As a result, it is clear that the greater frequency corresponds to greater importance. As a result, the current study attempted to analyse the news category on a month-by-month basis in order to draw conclusions on this count.

The study under investigation has taken the year 2021 (January, 2021-

December, 2021) as the base year for examining the issue of the image of Muslims in the mainstream English dailies of India. The ongoing Farmer's movement against the three Farm Laws, which has received significant coverage in the mainstream media, has brought issues relating to the Sikh community of India to the forefront of public discourse in the year 2021. Additionally, the year 2021 has not been particularly different for the Muslims, who constitute the country's largest religious minority. Hate crimes and communal propaganda directed against them have increased at an alarming rate. A number of attacks on Christian educational institutions were also reported in the year 2021, according to official statistics.

Methods Of The Data Collection

Every issue of The Indian Express and Dainik Jagran (in Hindi) from the year 2021 was subjected to a thorough examination. In addition to the aforementioned mainstream dailies, data was gathered for this study from a total of 760 newspaper issues, which included a total of 2,19,000 reports in total. A total of 2,19,000 reports were received for this study, with the ones pertaining to religious minorities in India being further scrutinised and classified for the purposes of this study.

We conducted quantitative analysis on all issues of The Indian Express²³ and Dainik Jagran (in Hindi) published between 1st January, 2021, and 31st December, 2021, except for dates the newspapers were not published.

It was necessary to identify and select every printed material that contained news about religious minorities, whether it was in the form of news stories, editorials, articles/features, or letters to the editor. In order to conduct quantitative analysis, the approximate word length of the column was measured. As a first step, the researcher determined the approximate word length of each news story, editorial, article/feature, and letter to the editor that had been identified.

The tone of news coverage of religious minorities in the media was divided into three distinct categories based on clearly defined parameters. They can be classified as positive, negative, or neutral. First, the approximate

23 Since we started the data collection on 18th January, 2022, the archive of Indian Express at their website was only available to us from 18th January, 2021 onwards. Hence, data collection for Indian Express newspaper began from 18th January, 2021.

length of words was calculated, and then the data was categorised, which was then analysed into these categories using the simple but effective statistical method.

Positive News: The stories in which issues related to minority affairs were projected in a positive way. The stories/coverage of minorities which depict the development and positive changes in their political, economic, and social sector, promotion of peace, and harmony, involvement in the accords/agreements leading to peace and prosperity with other religious communities were coded as positive.

Negative News: Stories related to religious minorities which reflect social strife, natural and human steered deaths and destruction, political instability, catastrophic, chaos and anarchy, shabby living conditions, criminal and immoral act, and political, economic, and social intra state and inter-state conflicts and disputes were coded as negative.

Neutral News: The stories that carry no emphasis on either positive or negative aspects of the minority's economic, political and social life were coded as neutral. The neutral category is not included in the test of significance in the present study, because neutral coverage does not clearly mention the emphasis on minority category image.

Test of significance

In this chapter, the Z test has been applied to find if there were any significant differences. There are two attributes namely, positive (P) and negative (N). The responses have been compared in terms of P1 and P2, where P1 represents the proportion of negative themes and P2 represents the proportion of positive themes.

To apply the z test a null hypothesis has been set up: $H_0 : P_1 = P_2$

When the proportion of negative themes is equal to the proportion of positive themes, the null hypothesis has been accepted.

Alternative hypothesis: $H_1: P_1 > P_2$ (one-tailed) when the negative themes exceed the positive theme then the alternative hypothesis has been accepted.

The level of significance has been taken at 5% and thus for one-tailed z

tests it is 1.64.

The following test statistic was used:

$$Z = \frac{P1 - P2}{\sqrt{PQ(1/n1 + 1/n2)}}$$

$$P = \frac{n1P1 + n2P2}{n1 + n2}$$

$n = 1 - P$

n1 = First sample size i.e. total negative themes

n2 = Second sample size i.e. total positive themes

P = Population proportion in terms of success

Q = Population proportion in terms of failure

P1 = x/n1 = proportion of negative themes

P2 = x/n2 = proportion of positive themes

When the calculated value is greater than the tabulated value, the null hypothesis (H0) has been rejected otherwise the null hypothesis has been accepted. Whenever the null hypothesis has been rejected, it means that the results are significant.

Analysis of the data

For this study two Hindi dailies have been analysed - Indian Express and Dainik Jagran- for a period of one year, starting from 1st January 2021 to 31st December 2021. This study has analysed the representation of three religious minorities - Muslims, Sikhs, and Christians. Month-wise data of every religious minority has been analysed to draw a conclusion from the data.

January

Table 1- level of significance of the image of Muslims, Sikhs, and Christians in two mainstream dailies for the month of January

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.576	0.131	2.448	1.64	Significant
Sikhs	0.473	0.297	0.851	1.64	Insignificant
Christian	0.875	0.125	0.741	1.64	Insignificant

Table 1 represents the level of significance of the image of Muslims, Sikhs, and Christians in Indian Express and Dainik Jagran for January 2021.

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one tailed test is 1.64.

Significant = negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.473-0.297) was 0.176. The difference between negative and positive themes for Christians (0.875-0.125) was 0.75. This difference is not seen to be statistically insignificant.

Table 1 shows that for January 2021, Z calculated for Muslims was 2.448, which is greater than the Z tabulated, 1.64 therefore the null hypothesis (H0) has been rejected and alternative hypothesis (H1) has been accepted. This means that the negative projection of Muslims in two newspapers was more than the positive projection. It can also be observed from the given table that the negative theme used for Muslims for January 2021 was 0.576, which is more than the positive theme 0.131.

For Sikhs the Z calculated was 0.851, which is less than the Z tabulated at 1.64 therefore H0 has been accepted. This reveals that the tone of news themes was not negative. Similarly, the Z calculated for Christians was 0.741, which is less than the Z tabulated, 1.64 therefore H0 has been ac-

cepted. This reveals that the tone of news themes was not negative.

February

Table 2 - Level of significance of the image of Muslims, Sikhs, and Christians in two mainstream dailies for the month of February.

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.542	0.158	2.378	1.64	Significant
Sikhs	0.439	0.122	1.062	1.64	Insignificant
Christian	0.600	0.200	0.384	1.64	Insignificant

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one tailed test is 1.64.

Significant = negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.439-0.122) was 0.317. The difference between negative and positive themes for Christians (0.600-0.200) was 0.4. This difference is not seen to be statistically insignificant.

Table 2 shows that for February 2021, Z calculated for Muslims was 2.378 which is greater than Z tabulated 1.64, therefore the H₀ is rejected and H₁ is accepted. This indicated that the negative projections of Muslims in the two newspapers were more than the positive projection. It can also be observed from the table that the negative theme for Muslims was 0.542 which is more than the positive themes of 0.158.

For Sikhs, the Z calculated was 1.062 which is less than Z tabulated value of 1.64 therefore H₀ has been accepted and H₁ has been rejected. Although it can be observed that the negative themes for Sikhs were 0.439 which is more than the positive theme of 0.122, this difference is not con-

sidered as statistically significant.

Similarly, for Christians the Z calculated was 0.384 which is less than Z tabulated value of 1.64, therefore, H₀ has been accepted and H₁ has been rejected. From the table, it can be observed that the negative theme for Christians was 0.600 which is more than the positive theme of 0.200, but this difference is not considered statistically significant.

March

Table 3- Level of significance of the image of Muslims, Sikhs, and Christians in two mainstream dailies for the month of March

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.518	0.132	2.459	1.64	Significant
Sikhs	0.400	0.343	0.181	1.64	Insignificant
Christian	0.600	0.300	0.490	1.64	Insignificant

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one-tailed test is 1.64.

Significant = Negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.400- 0.343) was 0.057. The difference between negative and positive themes for Christians (0.600-0.300) was 0.3. This difference is not seen to be statistically insignificant.

Table 3 shows that the Z calculated value for Muslims was 2.459 which is greater than the Z tabulated value of 1.64. Since the calculated value is greater than the tabulated value the H₀ has been rejected and H₁ has been accepted. This means that the negative projections of Muslims were higher than the positive projections in the two newspapers. The table also

indicated that the total negative themes for Muslims were 0.518 which is higher than the positive themes of 0.132.

For Sikhs it can be observed that the Z calculated value was 0.181 which is less than 1.64, Z tabulated value. Since the calculated value is less than the tabulated value the H0 has been accepted and H1 has been rejected. However, it can be observed from the table that the negative projection for Sikhs is at 0.400 which is higher than the positive projection of 0.343, but this difference is not considered as statistically significant.

Similarly, for Christians, it can be observed that the Z calculated value was at 0.490 which is less than the Z tabulated value of 1.64 and thus H0 is accepted and H1 is rejected. Although it can be observed from the table that the negative projections are at 0.600 which is higher than the positive projections of 0.300, this difference is not considered statistically significant.

April

Table 4- Level of significance of the image of Muslims, Sikhs, and Christians in two mainstream dailies for the month of April.

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.480	0.207	2.063	1.64	Significant
Sikhs	0.277	0.170	0.285	1.64	Insignificant
Christian	0.625	0.250	0.506	1.64	Insignificant

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one tailed test is 1.64.

Significant = negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.277-0.170) was 0.107. The difference between negative and pos-

itive themes for Christians (0.625-0.250) was 0.375. This difference is not seen to be statistically insignificant.

Table 4 shows that in April 2021 for Muslims the Z calculated was at 2.063 and Z tabulated was 1.64. Since the Z calculated is greater than the Z tabulated H0 has been rejected and H1 has been accepted. This indicates that the negative projections of Muslims in the two newspapers were greater than the positive projections. It can also be noted from the table that the total negative themes for Muslims is 0.480 which is higher than positive projections of 0.207.

For Sikhs, it can be noted that the Z calculated was at 0.285 and the Z tabulated value is at 1.64. Since the Z calculated is less than the Z tabulated the H0 has been accepted and H1 has been rejected. The table indicates that the negative projections for Sikhs is 0.277 which are higher than the positive projections of 0.170 but this difference is not considered to be statistically significant.

Similarly, for Christians, it can be noted that the Z calculated was at 0.625 and the Z tabulated value is at 1.64. Since the Z calculated is less than the Z tabulated the H0 has been accepted and H1 has been rejected. The table indicates that the negative projection for Christians is 0.625 which is higher than the positive projection of 0.250 but this difference is not considered to be statistically significant.

May

Table 5- Level of significance of the image of Muslims, Sikh, and Christians in two mainstream dailies for the month of May.

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.346	0.264	0.529	1.64	Insignificant
Sikhs	0.157	0.333	-0.609	1.64	Insignificant
Christian	0.000	0.667	NA	1.64	NA

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one tailed test is 1.64.

Insignificant = The difference between negative and positive themes for Muslims (0.346- 0.264) is 0.082 whereas for Sikhs (0.157-0.333) it is -0.176. This difference is not statistically significant.

NA = Since there were no negative projections for Christians in May 2021, the Z test could not be calculated and hence it is not applicable.

Table 5 depicts that in May 2021, Z calculated for Muslims was 0.529, and the Z tabulated is 1.64. Since the tabulated value is greater than the calculated value, H0 has been accepted. However, looking at table 5 closely tells us that the negative projection of Muslims is 0.346 which is higher than the positive projection which is 0.264 but this difference is not considered as statistically significant.

For Sikhs the Z calculated is -0.609 and the Z tabulated is 1.64. Since the tabulated value is more than the calculated value the H0 has been accepted. Table 5 also indicates that for this month the positive projection for Sikhs was 0.333 which is higher than the negative projection of 0.157.

Z test was inapplicable for Christians for May 2021 because of a lack of P1. However, from the table it can be observed that while there are no negative projections for May 2021, the positive projections stand at 0.667 indicating that positive projections were greater than negative projections.

June

Table 6- Level of significance of the image of Muslims, Sikh, and Christians in two mainstream dailies for the month of June.

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.632	0.165	2.793	1.64	Significant
Sikhs	0.284	0.337	-0.266	1.64	Insignificant
Christian	0.600	0.000	NA	1.64	NA

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportion

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one-tailed test is 1.64.

Significant = Negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.284-0.337) was -0.053. This difference is not statistically insignificant.

NA = Since there were no positive projections for Christians in June 2021, Z test could not be calculated and hence it is not applicable.

Table 6 depicts that the Z calculated for Muslims in June 2021 was 2.793 and the Z tabulated was 1.64. Since the Z calculated is greater than the Z tabulated, H₀ has been rejected and H₁ has been accepted. This means that the negative projections of Muslims in the two newspapers were more than the positive projections. From the same table, it can also be observed that the negative projection of Muslims stands at 0.632 and the positive projections stand at 0.165. Clearly, negative projections are greater than positive projections.

For Sikhs the Z calculated is -0.266 and the Z tabulated is 1.64. Since Z tabulated is more than Z calculated, the H₀ has been accepted and H₁ has been rejected. From the table, it can also be observed that the positive projections stand at 0.337 and the negative projections stand at 0.284. Thus, for June 2021, the positive projections for Sikhs are greater than the negative projections.

Z test was inapplicable for Christians for June 2021 because of a lack of P2. However, it can be noted from the table that the negative projection for Christians is 0.600. Thus the negative projections for Christians were higher than the positive projections (0.00) in June 2021.

July

Table 7- Level of significance of the image of Muslims, Sikhs and Christians in two mainstream dailies for the month of July

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.678	0.167	2.719	1.64	Significant
Sikhs	0.226	0.339	-0.452	1.64	Insignificant
Christian	0.714	0.286	0.579	1.64	Insignificant

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one-tailed test is 1.64.

Significant = Negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.226-0.339) was -0.113. The difference between negative and positive for Christians (0.714-0.286) was 0.428. This difference is not statistically insignificant.

Table 7 indicates that the Z calculated for Muslims was 2.719 for July 2021 while the Z tabulated value was 1.64. Since the calculated value is greater than the tabulated value, H0 is rejected and H1 is accepted. This indicates that the negative projection of Muslims in July 2021 was greater than the positive projections. The negative projection for Muslims was 0.678 which is greater than the positive projection of 0.167.

For Sikhs, the Z calculated was -0.452 while the Z tabulated was 1.64. Since the calculated value is less than the tabulated value, H0 is accepted. The negative projections for Sikhs were 0.226 and the positive projections were 0.339. The positive projections were greater than the negative projections for Sikhs in July 2021.

For Christians, the Z calculated was 0.579 while the Z tabulated was 1.64.

Since the Z calculated is less than the Z tabulated H_0 is accepted. However, from table 7 it can be observed that the negative projections for Christian were 0.714 and the positive projections were 0.286. Although the negative projection is greater than the positive projection, the difference between them (0.714-0.286) is 0.428, which is considered statistically insignificant.

August

Table 8- Level of significance of the image of Muslims, Sikhs, and Christians in two mainstream dailies for the month of August

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.645	0.172	2.709	1.64	Significant
Sikhs	0.159	0.455	-1.022	1.64	Insignificant
Christian	0.000	0.500	NA	1.64	NA

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one-tailed test is 1.64.

Significant = negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.159-0.455) was -0.296. This difference is statistically not insignificant.

NA = Since there were no negative projections for Christians in August 2021, Z test could not be calculated and hence it is not applicable.

From table 8 it can be noted that the Z calculated for Muslims for August 2021 was 2.709 which is more than 1.64, Z tabulated. Therefore, H_0 is rejected and H_1 is accepted. This indicates that the negative projections of Muslims in the two newspapers is greater than the positive projections in August 2021. Additionally, table 8 also indicated that the negative projec-

tions of Muslims were at 0.645 while positive projections were at 0.172 which clearly indicated that negative projections were greater than the positive projections.

For Sikhs, the Z calculated for August 2021 was -1.022 which is less than 1.65, the Z tabulated and thus H₀ has been accepted. Positive projections for Sikhs is 0.455 which is greater than the negative projections, 0.159.

Z test was inapplicable for Christians for August 2021 because of a lack of P₁. However, it can be noted from the table that the positive projection of Christians is 0.500 which is greater than the negative projections.

September

Table 9- Level of significance of the image of Muslims, Sikh, and Christians in two mainstream dailies for the month of September

Religion	P ₁	P ₂	Z calculated	Z tabulated	Level of significance
Muslims	0.750	0.088	2.448	1.64	Significant
Sikhs	0.190	0.293	-0.375	1.64	Insignificant
Christian	0.667	0.000	NA	1.64	NA

P₁ = Proportion of negative image

P₂ = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one tailed test is 1.64.

Significant = Negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.190-0.293) was -0.103. This difference is statistically not insignificant.

NA = Since there were no positive projections for Christians in September 2021, Z test could not be calculated and hence it is not applicable.

From table 9 it can be noted that the Z calculated for Muslims in September 2021 is 2.448 and Z tabulated is 1.64. Since the calculated value is greater than the tabulated value, H₀ has been rejected and H₁ has been accepted. It can also be observed from the table that the negative projections of Muslims, 0.750, is higher than the positive projection, 0.088. Thus, it can be concluded that for September 2021, the negative projections for Muslims were higher than positive projections in the two newspapers.

For Sikhs, it can be noted that the Z calculated is -0.375 and Z tabulated is 1.64. Since the tabulated value is more than the calculated value we will accept the H₀. The positive projection of Sikhs, 0.293 is greater than the negative projection, 0.190 in September 2021.

Z test was inapplicable for Christians during September 2021 because of lack of P₂. However, it can be observed from the table that the negative projections for Christians, 0.667 is greater than positive projections, 0.00.

October

Table 10- Level of significance of image of Muslims, Sikhs and Christians in two mainstream dailies for the month of October.

Religion	P ₁	P ₂	Z calculated	Z tabulated	Level of significance
Muslims	0.834	0.075	3.282	1.64	Significant
Sikhs	0.416	0.429	-0.067	1.64	Insignificant
Christian	0.750	0.167	0.805	1.64	Insignificant

P₁ = Proportion of negative image

P₂ = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one tailed test is 1.64.

Significant = Negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.416-0.429) was -0.013. The difference between negative and

positive themes for Christians (0.750-0.167) was 0.583. This difference is statistically not insignificant.

Table 10 indicates that the Z calculated for Muslims in October 2021 was 3.282 while the Z tabulated was 1.64. Since the Z calculated is greater than the Z tabulated, H0 is rejected and H1 is accepted. This indicated that the negative projections of Muslims were greater than the positive projection in the two newspapers in October 2021. On observing the table it can also be noted that the negative projections for Muslims was 0.834 which is greater than the positive projection, 0.075.

For Sikhs, the Z calculated value is -0.067 which is less than the Z tabulated, 1.64 thus H0 is accepted. The positive projection of Sikhs is 0.429 which is greater than the negative projection, 0.416.

For Christians, the Z calculated is 0.805 which is less than the Z tabulated, 1.64 and thus H0 has been accepted. However, from the table it can be observed that the negative projections of Christians in October 2021 is 0.750 which is greater than the positive projections, 0.167. However, this difference is not considered statistically significant and H0 is accepted.

November

Table 11- Level of significance of the image of Muslims, Sikhs, and Christians in two mainstream dailies for the month of November.

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.712	0.076	2.435	1.64	Significant
Sikhs	0.357	0.452	-0.363	1.64	Insignificant
Christian	0.667	0.333	0.314	1.64	Insignificant

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level

of significance for one tailed test is 1.64.

Significant = negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.357-0.452) was -0.095. While the difference between negative and positive projections of Christians (0.667-0.333) = 0.334. This difference is statistically not insignificant.

From table 11 it can be noted that the Z calculated for Muslims was 2.434 which is greater than the Z tabulated value of 1.64 and thus H0 is rejected and H1 is accepted. This indicates that the negative projections of Muslims are greater than the positive projections. This can also be clearly observed from the table where negative projections are 0.712 and positive projections are 0.076.

For Sikhs, the Z calculated value was -0.363 which is less than the Z tabulated value of 1.64 and hence H0 is accepted. From the table it can be noted that the positive projection for Sikhs are 0.452, which is greater than the negative projection 0.357.

For Christians, the Z calculated value for November 2021 was 0.314 which is less than the Z tabulated value of 1.64 and thus, H0 is accepted. However, from the table, it can be noted that the negative projections for Christians were 0.667 and the positive projections were 0.333, but this difference is not considered statistically significant.

December

Table 12- Level of significance of the image of Muslims, Sikhs and Christians in two mainstream dailies for the month of December.

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.729	0.164	3.260	1.64	Significant
Sikhs	0.243	0.568	-1.671	1.64	Insignificant
Christian	1.000	0.000	NA	1.64	NA

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one-tailed test is 1.64.

Significant = Negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.243-0.568) was -0.325. This difference is statistically not insignificant.

NA = Since there were no positive projections for Christians in December 2021, Z test could not be calculated and hence it is not applicable.

In table 12 the Z calculated value for Muslims in December 2021 is 3.260 which is greater than the Z tabulated value of 1.64 and thus H₀ is rejected and H₁ is accepted. This indicated that the negative projections for Muslims were greater than the positive projections for December 2021. This can also be noticed in table 12 where the negative projections are 0.729 while the positive projections are 0.164.

For Sikhs, the Z calculated value in December 2021 was -1.671 which is less than Z tabulated, 1.64 and thus, H₀ is accepted. The positive projections of Sikhs, 0.568 is greater than the negative projections, 0.243.

Z test could not be calculated for Christians during December 2021 because of a lack of P2. However, it can be observed from the table that the negative projections of 1.000 were greater than the positive projections, 0.00.

Half-yearly analysis of Indian Express

January 2021- June 2021

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.367	0.248	1.246	1.64	Insignificant
Sikhs	0.223	0.293	-0.528	1.64	Insignificant

Christian	0.273	0.545	-0.546	1.64	Insignificant
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P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one tailed test is 1.64.

Insignificant = The difference between negative and positive themes for Muslims (0.367-0.248) was 0.119. Whereas this difference for Sikhs (0.223-0.293) and Christians (0.273-0.545) was -0.07 and -0.272. This difference is statistically not insignificant.

From the given table it can be observed that the Z calculated value for Muslims, Sikhs and Christians is 1.246, -0.528, and -0.546 respectively. The Z calculated value for all three religions is less than the Z tabulated value of 1.64 and thus the results are insignificant for all three religions and so the H₀ has been accepted for all three religions. However it can be noted from the table that the negative projection of Muslims is 0.367 which is higher than the positive projection, 0.248 but this difference is not considered statistically significant and this H₀ is accepted.

For Sikhs and Christians, the positive projections are greater than the negative projections for January 2021- June 2021. The negative projections for Sikhs and Christians are 0.223 and 0.273 respectively, while the positive projections for Sikhs and Christians are 0.293 and 0.545 respectively.

July 2021- December 2021

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.636	0.170	4.426	1.64	Significant
Sikhs	0.201	0.470	-2.646	1.64	Insignificant
Christian	0.593	0.259	0.837	1.64	Insignificant

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one-tailed test is 1.64.

Significant = Negative projection is greater than positive projection

Insignificant = The difference between negative and positive projections for Sikhs (0.201-0.470) was -0.269. The difference between negative and positive projections for Christians (0.593-0.259) is 0.334. This difference is statistically not insignificant.

From the table, it can be noted that the Z calculated for Muslims from July 2021 to December 2021 is 4.426 which is greater than the Z tabulated value, 1.64. Thus H0 is rejected and H1 is accepted. This indicated that the negative projections of Muslims (0.636) is greater than the positive projections (0.170) in Indian Express from July 2021 to December 2021.

For Sikhs, the Z calculated value is -2.646 which is less than the Z tabulated value, 1.64 and hence H0 is accepted. The positive projection of Sikhs is 0.470 which is greater than the negative projection, 0.201.

For Christians, the Z calculated value is 0.837 which is less than the Z tabulated value, 1.64 and thus, H0 is accepted. However, it can be noted from the table that the negative projection of Christians is 0.593 which is greater than the positive projection, 0.259.

Half-yearly analysis of Dainik Jagran

January 2021- June 2021

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.594	0.135	5.301	1.64	Significant
Sikhs	0.537	0.211	1.891	1.64	Significant
Christian	0.750	0.107	1.096	1.64	Insignificant

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one tailed test is 1.64.

Significant = Negative projection is greater than positive projection

Insignificant = The difference between negative and positive projections for Sikhs (0.537-0.211) 0.326 was. The difference between negative and positive projections for Christians (0.750-0.107) is 0.643. This difference is statistically not insignificant.

For January 2021 to June 2021 the Z calculated for Muslims was 5.301 which is greater than the Z tabulated, 0.164. Thus, H₀ is rejected and H₁ is accepted. This indicates that in Dainik Jagran, the negative projections of Muslims, 0.594 is greater than the positive projections, 0.135.

For Sikhs, it can be noticed that the Z calculated was 1.891 which is greater than Z tabulated, 1.64. This means that in Dainik Jagran the negative projections of Sikhs, 0.537 is greater than the positive projections, 0.211.

For Christians, the Z calculated value is 1.096 which is less than Z tabulated value, 1.64 and hence H₀ is accepted. However, on looking at the table closely, it is observed that the negative projections of Christians, 0.750 is greater than the positive projections, 0.107 but this difference is not statistically significant and hence H₀ is accepted.

July 2021-December 2021

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.812	0.081	5.219	1.64	Significant
Sikhs	0.868	0.053	1.149	1.64	Significant
Christian	0.938	0.000	NA	1.64	NA

P1 = Proportion of negative image

P2 = Proportion of positive image

Z calculated = The calculated value of test of significance for difference of proportions

Z tabulated = Tabulated value from the standard normal table at 5% level of significance for one tailed test is 1.64.

Significant = negative projection is greater than positive projection

Insignificant = The difference between negative and positive themes for Sikhs (0.868-0.053) was 0.815. This difference is statistically not insignificant.

NA = Since there were no positive projections for Christians from July 2021 to December 2021, the Z test could not be calculated and hence it is not applicable.

For Muslims, the Z calculated value is 5.219 which is greater than the Z tabulated value, 1.64 and thus H₀ is rejected and H₁ is accepted. This indicates that in Dainik Jagran the negative projections of Muslims were greater than the positive projection from July 2021 to December 2021. Negative projections of Muslims equaled 0.812 while the positive projections equaled 0.081.

For Sikhs, the Z calculated value is 1.149 which is less than the Z tabulated value of 1.64 and thus H₀ is accepted. However, from the table, it is clear that in Dainik Jagran from July 2021 to December 2021 the negative projections of Sikhs, 0.868 was greater than the positive projections, 0.053 but this difference is not statistically significant and thus H₀ is accepted.

Z test couldn't be calculated for Christians from July 2021 to December 2021 because of the lack of P₂. This means that there were no positive projections of Christians from July 2021 to December 2021, but the negative projections were 0.938.

Conclusion

The findings indicate that the selected Hindi dailies consistently have provided more negative projections of Muslims. Monthly analysis for both the newspapers combined have revealed that all the months of 2021 except May were statistically significant. However, the negative projections for Muslims were greater than the positive projections in May 2021 but the

difference isn't considered as statistically significant.

The month wise analysis of the two newspapers combined also revealed that all the months for Sikhs were insignificant. However, from January 2021 to April 2021 the negative projections for Sikhs were greater than the positive projections, but the difference isn't considered as statistically significant. From June 2021 to December 2021 the positive projections of Sikhs were greater than the negative projections.

For Christians, all the months were insignificant except for August, September and December where the Z test couldn't be calculated. However, the negative projections of Christians in both the newspapers combined were greater in all the months except May and August.

The monthly analysis of Indian Express and Dainik Jagran combined indicates that the negative projections of Muslims were greater than positive projections throughout the year. The negative projections of Sikhs was greater than the positive projections for the first four months of the year but for the rest of the year the positive projections were more. For Christians the negative projections were greater than compared to the positive projections throughout the year with an exception of May and August.

Half yearly analysis of Indian Express revealed that the results for Muslims, Sikhs and Christians were insignificant for January 2021 to June 2021. However, it was found that the negative projections of Muslims was greater than the positive projections but the difference is not considered as statistically significant. For the rest of the year i.e. from July 2021 - December 2021 the results were significant for Muslims whereas it was insignificant for both Sikhs and Christians. However, the negative projections of Christians were greater than the positive projections in Indian Express from July 2021 to December 2021. For Sikhs, it was found that the positive projections were greater than the negative projections in Indian Express throughout the year.

Half-yearly analysis of Dainik Jagran revealed that the results were significant for Muslims throughout the year. While for Sikhs the results were significant for Jan 2021 to June 2021 and it was insignificant from July 2021 to December 2021. However, it was found that the negative projections of Sikhs in Dainik Jagran were greater than the positive projections for all the months, but the difference isn't considered statistically signifi-

cant. For Christians, the results were insignificant for Jan 2021 to June 2021. However, it was found that the negative projections of Christians were greater than the positive projections for the first six months. For the second half of the year i.e. from July 2021 to December 2021, the Z test for Christians couldn't be calculated because of the lack of any positive themes in Dainik Jagran.

Part B: Perspectives

Qualitative changes in hate speech against minorities

Visakan Pillai

The term Hate Speech implies a form of communication that would create an atmosphere of fear, aversion, and unpleasantness to say the least.¹ A term that has found its way into common discourse, has existed since time immemorial and has only found new ways of infiltrating common parlance while going unchecked as though we as a society have accepted it as ordinary. For the people, by the people and of the people is a principle that our government rests on. Elected officials merely reflecting what society deems fit to protect and lead them to prosperity. When such reflection spews hatred and publicly calls for genocide and violence, surely the onus must be on society as well. However, are we as democratic as we like to believe we are? Social media is a tool that has become powerful in ways that we simply could not have predicted. In the lead up to the 2019 elections, social media was seen to be used in an extremely dangerous fashion wherein the Bharatiya Janata Party even created its own app filled with misinformation and propaganda against non-Hindus. WhatsApp was also seen as a primary instrument in spreading toxic misinformation and to incite fear amongst the population.² 2019 was not a peculiar year for the agenda against non-hindus as several hate monitors and media watches have also pointed out that there has been a massive hike in hate speech against Muslims in India since Prime Minister Modi came to power in 2014. According to NDTV India, there's been an 1130% increase in hate speeches by influential politicians and 80% of them are from the BJP. India Spend, an online data journalism portal, reported that 97 percent of cow-related violence in the last ten years happened after 2014 and that 86 percent of those killed were Muslims. Scores of Muslim men have been either murdered or brutally assaulted over the years on the suspicion of cattle smuggling. A study by the London School of Economics (sponsored by WhatsApp) strongly suggests that mob violence is ideologically driven. The numbers may be even higher. For instance, In the run-up to the UP elections, the wire compiled 34 speeches of Chief Minister Yogi Adityanath, popularly known as Bulldozer Baba, and Encounter Baba in the Hindutva vocabulary for his instant vigilante-style justice. Between November 2021 to February 2022, there are over 100 instances of hate

1 Sharma, I., 2019. Contextualising Hate Speech: A Study of India And Malaysia. *Journal International Studies*, 15, 133-144.

2 Chopra, R. (2019, April 23). In India, WhatsApp is a weapon of antisocial hatred. *The Conversation*. <https://theconversation.com/in-india-whatsapp-is-a-weapon-of-antisocial-hatred-115673>

speech, dog whistles, and religious polarization mostly targeting the Muslim minority in his speeches. This is just one major politician's speech in a span of 3 months and his social media posts or TV interviews during this period have not been included in the study. Hate speech tends to alter the perception of the groups that it is being aimed at thus denying them access to resources that any other 'majority' group would receive as was seen during the COVID-19 pandemic wherein medical resources were being denied to Muslims on account of the being stereotyped as intentionally spreading the disease.³ Therefore, we could interpret hate speech as an attack on equality and by extension an attack on the Constitution that guarantees such equality.

India's Descent Into Genocidal Hate Speech

As hate speech used to be constructed previously, it could be seen in a threatening manner and less genocidal in nature. While hate speech against communities has been ignored, it has naturally been elevated to the next step. What would have once been unthinkable has now become sayable as these communities have begun to be othered. Genocide may not be explicitly mentioned in the Indian Penal Code, however, the right to life is a fundamental right and a call to genocide would be a violation of the same. Between 17th December and 20th December 2021, at the religious congregation in Haridwar, Hindutva leaders were seen addressing the public calling for 'real Hindus' to take up arms and kill Muslims. As has become the norm, the Uttarakhand government was silent, and it is no coincidence that it is a BJP run state. In the run up to the U.P elections, Chief Minister Yogi Adityanath relied heavily on his tactic of stirring anti Muslim sentiment by constantly equating them to terrorists.⁴ He has also spoken extensively on his use of 'bulldozers' to be used against 'rioters'. As of January 2022, over 12 open calls inciting group killings of Muslims were made in 5 Indian states in just two years. However, the number crossed 20 in just the next 3 months. And by 20th April, 2022, at least 10 more open calls to genocide by the same group of Hindu nation-

3 Shivanand, S. (2020, September). THE WAGES OF HATE: JOURNALISM IN DARK TIMES. WordPress.com. <https://hatespeechbeda.files.wordpress.com/2020/10/finalhate-speechreport.pdf>

4 Chowdhury, K. (2022, January 28). India's Descent Into a Spiral of Genocidal Hate. The Diplomat. <https://thediplomat.com/2022/01/indias-descent-into-a-spiral-of-genocidal-hate/>

alists were made in just 20 days including the repetition of the infamous Haridwar Dharam Sansad at various places across India. In April 2022, targeted attacks against the Muslim minority were reported from several Indian cities during the Hindu festival of Ramnavami. Videos of armed mobs dancing with weapons outside and abusing Muslims went viral on social media. “Shoot the traitors of the nation,” a slogan popularised by the leaders of the ruling BJP became the call for violence against Muslims in 2020 during the anti-Muslims pogrom in North-East Delhi in which 53 people, most of them Muslim, were killed. However, by 2021, the slogan was replaced by a more direct call to murder Muslims—“Jab Mulle Kaate jayenge, Tab Ram Ram Chillayenge” [When Muslims will be cut up, they will shout the name of Ram]. The slogan came to light after the series of Mahapanchayats in the Northern state of Haryana in support of the Hindus accused in the lynching case of a Muslim gym trainer named Asif. At the Mahapanchayats direct calls exhorting the murder of Muslims and abduction of Muslim women were made. Several incendiary speeches were made at the event. “A eunuch named Asif has been killed because of his deeds ... Look at Hindu unity ... We won’t even spare your unborn if our sisters’ honour is touched ... we’ll set the area on fire,” stated the Jamia shooter who had open fired upon a peaceful procession of Muslim students protesting the controversial new citizenship law. He was a minor at that time. Another political strategy that has become a signature of BJP leaders is the bulldozer model.

Bulldozers As A Political Strategy

The bulldozer commonly called as JCBs in India has now become a symbol of the dispossession of Muslims in India. The Chief Minister of the most populous state in India, Yogi Adityanath is known as “bulldozer baba.” In seeking re-election earlier this year, it became an integral part of the Yogi’s campaign. Bulldozers were stationed at election rallies as a symbol. “If you think that government bulldozers should be always running against the mafia and professional criminals, then the BJP is necessary,” Adityanath had said at one of his election rallies in March. This use of the word mafia and criminals was a dog whistle for Muslims and it was clearly explained by the BJP leaders and their slogans.

A BJP leader and an MLA, Raja Singh, also booked for hate speech against Muslims during Ram Navami processions, had explicitly explained the

utility of bulldozers. “Thousands of bulldozers and JCBs⁵ have been bought by UP chief minister Yogi Adityanath and they are on their way. After the elections, those who voted against Yogiji – in their areas will be identified. and I am sure you know what JCBs and bulldozers are used for. I want to inform those traitors of UP who don’t want Yogi Adityanath to be elected as CM again that if you want to stay in UP, you will have to chant Yogi-Yogi. If not, you will have to run away from the state,” he had threatened. These instances are just a glimpse into what is now an epidemic of hate against Muslims by the ruling party. The gravity of this situation is nothing short of alarming as a founding member of the organisation ‘Genocide Watch’ commented on the rising levels of hate speech in India against non-Hindus stating the similarities between these instances and the run-up to the Rwandan genocide.

CAA Protests And The Process Of Othering

The process of being othered was mentioned earlier in the chapter as Muslims have begun to be seen less as humans and more as objects which allows for public calls for genocide to go unnoticed or rather leave people unbothered. The CAA was the first step in ensuring this process of othering by construing the Muslim community as an alien under law. However, it was so blatantly unconstitutional that it did face some backlash. During the protests against the new Citizenship Amendment, protesters of all kinds were deemed anti national but Muslim protesters faced targeted hate speech.⁶ As presented previously, we noticed a spike in anti-muslim hate speech since the election of the Modi-led BJP government in 2014. On 12th December, 2019, the Modi government was allowed to enact the Citizenship Amendment Act under which, for the first time, religion was the basis for granting citizenship. Under the Act, all non-Muslims seeking asylum from neighbouring countries were fast-tracked. Coupled with the National Population Register and the National Register of Citizens created to identify illegal immigrants, millions of Muslims were fearful of their

5 JCB is a heavy construction machinery company that also manufactures bulldozers. In many places in India, bulldozers are commonly known as JCBs due to the brand’s popularity.

6 “Shoot the Traitors”: Discrimination Against Muslims under India’s New Citizenship Policy | HRW. (2020, April 9). Human Rights Watch. https://www.hrw.org/report/2020/04/09/shoot-traitors/discrimination-against-muslims-under-indias-new-citizenship-policy#_ftn166

citizenship being stripped away. During the protests there was a standard response by the BJP wherein when BJP-affiliated groups attacked protesters, the police did nothing. In BJP-governed states, the police used excessive force killing 30 people. Hundreds were arrested and most of those killed were Muslims. Internet shutdowns, archaic public gathering laws, and draconian sedition laws were used to silence protestors. On 30th January, 2020, shooting inside Jamia Millia Islamia University in Delhi was met with the same apathy and lack of response. The Uttar Pradesh chief minister, Yogi Adityanath stated that he vowed to take revenge against protestors of the citizenship law. His name is a common occurrence in extra-judicial killings and violence by the police as he has adopted that as his mode of justice.

Economic Boycott

The right to livelihood is a right that is provided as an extension to the right to life under Article 21 of the Constitution. This right includes the ability to profess any occupation that abides by the laws of the land. Any attempt to disrupt this livelihood and hinder the process of carrying out any profession by any community would be a violation of the right to livelihood and hence a violation of a fundamental right. In August 2019, a man named Devraj Pandit filmed and uploaded a video on Facebook wherein he was seen vandalising a Muslim street food vendor's booth in the city of Mathura. Pandit attacked this man because he was a Muslim and the stall he was running was named after a Hindu god. He accused the Muslim vendor of committing 'economic jihad' and it was due to people like him that Hindus do not get jobs. He also made an appeal for rebellion against such vendors.

In another such viral video, a mob of Hindu vigilantes assaulted a Muslim man named Tasleem Ali, who was selling bangles in the Indian state of Madhya Pradesh. When you observe Tasleem Ali being attacked and having his money ripped away from him in that video, you'll notice that the audience never says anything to help him or stop the violence. After the video went viral, there was a widespread public outcry to punish the perpetrators. The group of men who beat him also threatened Tasleem stating that he should never be seen in a "Hindu Kshetra" ever again. However, the next day, Madhya Pradesh's home minister appeared on camera and made the extremely severe claim that Tasleem Ali had assaulted a little

child. He also claimed that Tasleem Ali's identification papers were incorrect. Even though the claims were unfounded, Tasleem Ali was charged. The media eventually caught on, and articles about 'choodi jihad', which literally translates to 'bangle jihad', began to appear. As a result, this man's reputation was tarnished, and his character was assassinated. Some even claimed on social media that he is linked to foreign forces, and Tasleem Ali was arrested and remained in prison for more than 100 days without bail. Following this, reports of Mobs checking Aadhar cards of Muslim vendors emerged and many Manihari Muslims who sell bangles stopped visiting Hindu villages. This was followed by the attacks—vandalism, boycotts, ban— on meat workers and meat eateries, mostly Muslim, on Navratri and other Hindu festivals.

In the last two years, Hindutva leaders have been pushing for a total boycott of Muslim businesses and their ban from public spaces. After the Hijab row in Karnataka and the recent violence during Ram Navami, the campaign only gained more currency. Right after the anti-Muslim violence in Northeast Delhi in February 2020, Sudarshan News editor Suresh Chavhanke called for a protest at India Gate on 4th March, 2020. This protest was preceded by a week of TV debates on the channel calling for an economic boycott of “rioters”. Chavhanke did not mention who these “rioters” were, but gave strong cues through the graphics and narration on his channel that he was referring to Muslims

“If you want to stop them from slitting your throat, then you have to stop donating your money in their ‘green chadar’ now,” Chavhanke said on his channel, when he had organized the protests in the first week of March. He went on to describe the “rioters”: “They get even more money than our army. If these rioters get more money than the army, then what will they do? Even barbers have an economy of 11,000 crore! ... If you make a list of the professions of the rioters, then there are many professionals like barbers, carpenters, puncture fixers, fruit vendors and most importantly, the meat businesses.”

We want to support all Hindu brothers who want to get into the business of fruit-selling, hairdressing or tyre fixing. Everyone knows the problem; we are working on the solution. Suppose we tell you, don't get a haircut from 'them' [Muslims] then we have to give options... if we want to remove 'them' from these businesses, then we need to have our own men,”

Hate Speech during the Pandemic year: The case of online hate speech during the pandemic

While India is a country that has been home to various epidemics and instances of hate speech, the recent COVID-19 pandemic only made pre-existing prejudices against Muslims and other minorities more apparent. The BJP-led Hindutva politicians have been forbearers in producing and spreading misinformation regarding anti-Muslim propaganda labelling the community as ‘super-spreaders’ or disease carriers in general.⁷ The infamous Tablighi Jamaat, held in March 2020 was labelled as a super-spreader event as politicians encouraged false information and propaganda labelling the community as one that is a danger to the rest of the country. 31st March, 2020 saw the biggest COVID-19 spike in India with a 17% rise in cases every day. The spike was attributed to the Tablighi meet in Delhi by the media, especially Hindi media. This sent a wave of islamophobia through the country as people not bothered with congregations previously were suddenly fueled with newfound passion for battling a pandemic that had existed months prior. This led to Muslim-owned businesses being boycotted and health workers being discriminated against. Muslims were denied healthcare on account of being ‘super-spreaders’ regardless of their involvement in the congregation. Leaders of the BJP had begun referring to the meeting as a ‘Talibani crime’ and ‘corona terrorism.’ The hashtag ‘Corona Jihad’ went viral on social media. WhatsApp groups were flooded with hateful messages and calls to boycott Muslim owned businesses. Muslims all over the country were demonised and accused of carrying COVID-19 while being physically assaulted. The rate of dissemination of misinformation is unfathomable with the advent of social media groups like WhatsApp and Twitter. The excessive scrutiny of the Tablighi Jamaat has contrasted with any scrutiny received by other religious congregations taking place at the same time. In Gujarat, between 9th March and 19th March, there were 8 different Hindu temples celebrating festivals with a combined footfall of 30000. A temple in Karnataka held a festival on the 16th April with hundreds of devotees well into the peak of the pandemic and even recorded our first pandemic death but faced no scrutiny on the level the Muslim community did. Chief Minister Yogi Adityanth was seen

7 Binny, M. (2022). Tracing the Contours of Hate Speech in India in the Pandemic Year: The Curious Case of Online Hate Speech against Muslims and Dalits During the Pandemic. *Contemporary Voice of Dalit*, 2455328X221094364.

attending a religious event in Ayodhya on 25th March after the national lockdown was announced.⁸ Epidemics have been attributed to marginalised communities since the phenomenon is as ancient as the bubonic plague. They saw the introduction of these diseases as divine intervention and the only way to protect themselves was to get rid of ‘trouble making’ communities. Thousands of Jews were murdered as they were seen as carriers of the disease. Minorities are often used as scapegoats by governments incapable of handling their jobs. Large waves of misinformation often precede extreme acts of violence. Whether this was during the Jewish genocide wherein nazis would purposefully spread misinformation about the ‘violent’ nature of Jews or the BJP government spreading misinformation about the ‘jihadi’ activities of Muslims. The Bombay High Court stated that there was a ‘big propaganda’ against those involved in the Tablighi Jamaat. In their judgement, Justices T.V Nalawade and M.G Sewilkar stated “There was big propaganda in print media and electronic media against the foreigners who had come to Markaz Delhi and an attempt was made to create a picture that these foreigners were responsible for spreading Covid-19 virus in India. There was virtually persecution against these foreigners.” They also mentioned that “a political government tries to find the scapegoat when there is pandemic or calamity and the circumstances show that there is a probability that these foreigners were chosen to make them scapegoats.”⁹

Reforming Indian Hate Speech Laws

It has been established that elected officials have no qualms in delivering hate speech or calling for genocide. Now we must understand whether these hate speeches are also being protected under the constitution. The term ‘hate speech’ is not defined under any statute. The Constitution of India allows for the freedom of speech and expression under Article 19, however it is not an absolute right as it also has constraints under Article 19(2). Any expression or speech that violates, or abuses in any way “the

8 Tabinda, S. (2022, April 14). Anti-Muslim Attacks During Ram Navami Processions. The Cognate. <https://thecognate.com/anti-muslim-attacks-during-ram-navami-processions/>

9 Mandhani, A. (2020, August 22). 'No proof Tablighi foreigners spread Covid, were made scapegoats' — Bombay HC quashes FIRs. ThePrint. <https://theprint.in/judiciary/no-proof-tablighi-foreigners-spread-covid-were-made-scapegoats-bombay-hc-quashes-firs/487277/>

interests of sovereignty and integrity of India, the security of the State, friendly relations with foreign States, public order, decency or morality, or concerning contempt of court, defamation or incitement to an offence” is subjected to be constrained under these exhaustive grounds. *Pravasi Bhalai Sangathan v. Union of India* saw the Supreme Court deny the plea for suo motu cognisance against individuals delivering hate speech under the pretext of the court’s inability to overreach the judicial framework. They also stated that defining a standard for hate speech would curb free speech and expression and hence prevent the judiciary from defining hate speech altogether. During the first Dharma Sansad in December 2021, the speakers called for the genocide of minorities in India and to create a ‘Hindu Nation.’ A case was registered after the event and no arrest was made till a petition was filed before the Supreme Court. However, during the second Dharam Sansad, after a speaker insulted Gandhi and applauded his assassin, he was arrested immediately. While this would not be construed as hate speech, the arrest was still made.¹⁰ Hate speech is criminalised under Sections 153A and 259A of the Indian Penal Code 1860 and Section 95 of the Criminal Procedure Code 1973. The primary concern in these statutes is the incompatibility they provide. The standard used to define hate speech is incitement to violence. This standard is rigid and basic and cannot be used as the sole evaluator in standardising hate speech. Even a speech that does not explicitly call for violence has the potential to discriminate and marginalise a community. Even misinformation should be construed as hate speech as was seen during the pandemic wherein Muslims were denied basic healthcare on account of such false information. There instead of the intent to cause violence, the intent to discriminate must be the standard. Therefore, the Indian Parliament must take notice of this lack of protection being offered to its own citizens due to a lack of legislatures. Taking into account the gravity of the situation in calling for genocides, the Court must take up cognisance and emphasise that the Constitution cannot be taken advantage of and its freedoms come with caveats. While understanding India’s genuine lack of domestic legal framework regarding hate speech laws and prosecution, an interesting approach to some reformation may be to also explore India’s obligations

10 Gupta, S. (2022, March 23). Reforming Indian hate speech laws’. The International Network for Hate Studies. <https://internationalhatestudies.com/reforming-indian-hate-speech-laws/>

to international treaties regarding genocide and its prevention. A monist view would imply that international law and State domestic laws act as a unified system. If a State were to accept an international treaty obligation, it would automatically apply to its domestic laws without the need for separate domestic legislation. Dualism implies the opposite wherein mere acceptance of international treaties does not imply domestic application and the same can only be achieved through domestic legislation. The Indian Parliament and executive have been adamant in stating that while the executive is empowered to commit India to certain treaties, to implement them is contingent on the parliament passing a law. Thus, even though India may be a party to the Genocide Convention, its provisions would be useless in India. India currently has no genocide-related provisions in its legislation.¹¹ There are no other authorities that can assume jurisdiction based on the Convention to prosecute genocide either. India consistently makes no efforts toward preventing any genocide. Article 1 of the Convention obligates India to prevent and punish genocide and its preventative duty applies to incitement through countless speeches we have witnessed through elected officials themselves. The penalties provided for hate speech in India are a fine or imprisonment for up to three years. The question this begs is the effectiveness of this penalty against genocidal speech which one would argue is the most egregious form of hate speech. The ICJ in the Bosnian Genocide case 2007 deliberated upon the preventative duties of states and the standard of ‘due diligence’ they must adopt to do everything within their power to prevent genocide.

11 Shrivastava, A. (2022, July 22). How India's Legislation Risks Impunity for Genocidal Speech. *Völkerrechtsblog*. <https://voelkerrechtsblog.org/how-indias-legislation-risks-impunity-for-genocidal-speech/>

Repression of Christian-run Educational Institutions in India

Mohd Uzair

There are approximately 27.8 million Christians in India, or 2.3% of the total population, making Christianity the third largest faith in the country after Hinduism and Islam. Thomas the Apostle, according to the recorded accounts of Saint Thomas Christians, sailed to the Malabar region in the present-day Kerala state in 52 AD and introduced Christianity to the Indian subcontinent.¹ The Malabarese Jews who had immigrated in India before the birth of Christ are mentioned as the earliest converts in the Acts of Thomas.² Scholars agree that by the sixth century AD, Christianity had spread over the Malabar peninsula. Syriac was the liturgical language of these communities, and its members were primarily Oriental Orthodox Eastern Christians who were members of the Church of the East in India.³

Southern Indian states make up about half of the total Christian population in India, while Christians form a relatively large share in India's more sparsely populated Northeast, where the vast majority of the Christians are from tribal communities. Despite Christians not making a considerable political force vis a vis their population during elections, the community has had considerable political attacks by the emerging ethno-nationalist Hindutva groups patronised by the ruling BJP. These attacks mainly are directed for, and at, the fact that Christianity is a proselytising religion unlike many other religions in India such as Hinduism. In recent years, attacks on Christian institutions and bodies on allegations of forced conversions have certainly multiplied. So much so that according to the World Watch List 2022, India ranks 10th, making it one of the worst countries globally to follow Christianity.⁴ Such attacks must be viewed in the larger phenomenon of asymmetrical polarisation India has undergone with the rise of supremacist Hindutva ideology which sees Islam and Christianity as foreign religions brought upon by invaders and colonisers.

In the last years, Christian educational institutions have undergone threats and attacks in the country. These attacks on Christians can be categorised as both organised and unorganised i.e., carried out by state and nonstate ac-

1 Carman, J. B., & Rao, C. V. (2014). *Christians in South Indian Villages, 1959-2009: Decline and Revival in Telangana*. Wm. B. Eerdmans Publishing.

2 Katz, N. (2000). *Who are the Jews of India?*. Univ of California Press.

3 Mingana, A. (1926). The early spread of Christianity in India. *Bulletin of the John Rylands Library*, 10(2), 435-514.

4 World watch list is a report released by Open Door that has monitored the persecution of Christians across the world since 1992.

tors. They are designed to target the Christian educational institutions that are widely present across the country. Christian minorities have played a major role in the developing the education system of modern India. Despite the significant contribution of the community to Indian education, schools and institutions run by the community have been constantly under threat and attack. The schools run by Christian groups are often portrayed by the allegations of forced religious conversions.⁵ BJP ministers have often demanded to ban education institutions belonging to the minority community.⁶ Such accusations and assaults on these institutions also have a significant impact on the dignity of the community. Cutting funds to minority institutions is another tool used to target them, which impacts their infrastructural growth and development. These issues neither gain media attention nor gain solidarity in the parliament, thus reporting such incidents becomes more important.

Such atrocities are directly motivated by the ideology followed by the current leadership of India, the BJP. Golwalkar was the second leader or the Sarsanghchalak of the RSS who is infamously known for his views on minorities in India, especially Indian Muslims and Christians. According to him, Indian Muslims and Christians are an ‘internal threat.’ In ‘Bunch of thoughts’ - a book that has a collection of writings of Golwalkar- there is a dedicated chapter called ‘internal threats’ wherein Muslims and Christians are described as a threat to India. He refers to Christians as “threat number two” and he writes “such is the role of Christian gentlemen residing in our land today, out to demolish not only the religious and social fabric of our life but also to establish political domination in various pockets and if possible, all over the land.”⁷

In ancient India, Education was exclusively available to the affluent upper-caste men who attended Gurukuls. Women and individuals from lower castes were denied access to schooling. Madarasas were created during the Medieval Ages, and other caste male members were allowed to attend such educational institutions. The British were the ones who started build-

5 Siddique, I. (2021, December 7). Catholic school in Madhya Pradesh vandalised by Hindu groups. The Indian Express. <https://indianexpress.com/article/cities/bhopal/catholic-school-in-madhya-pradesh-vandalised-by-hindu-groups-7659955/>

6 PTI. (2022, March 28). Ban madrasas in Karnataka, says BJP MLA Renukacharya. Times of India. <https://timesofindia.indiatimes.com/home/education/news/ban-madrasas-in-karnataka-says-bjp-mla-renukacharya/articleshow/90497450.cms>

7 Golwalkar, M. S. (1996). Bunch of thoughts.

ing Missionary Schools across India for a variety of objectives, including the spread of Christianity, the creation of a workforce for the East India Company in India, and so on. The first Christian Missionary School (CMS) school in India was 'Jai Narayan's boys' school in Benaras, which opened for girls in 1822.⁸ CMS was gradually spread across the country. The spread of Christian missionary schools in India provided opportunities for girls and persons from lower castes to receive an education. In missionary schools, English became the primary means of communication. The Charter Act of 1813 featured provisions aimed at improving India's educational situation.⁹ For the first time in India, funds were set aside specifically to expand education. The EIC was forced to take the burden of educating Indians as an outcome of the act. As a result, several schools and colleges were established in India, laying the groundwork for 'modern education' in the country. RSS appears to be following CMS' footsteps by establishing nationwide educational networks, particularly in North-East India and other tribal areas, in order to preach Hindutva and Ultra Nationalism. The aim of the educational institutions set up by RSS is to 'Indianised, nationalise and spiritualise' education. The "Har Prakhand Mein Vidhyalaya" project aims to set up schools in every district. Through these schools, the RSS is trying to fulfil their larger aim which is to dehumanise minorities and establish a Hindu nation. The educational wing of RSS, Vidhya Bharti is yet another attempt of the BJP and Sangh to rewrite history where minorities are portrayed as villains and Hindu rulers are hailed. A book of class 9 claims that "Mughal emperor Aurangazeb had demolished a temple in Sri Krishna's birthplace. Efforts are on to liberate the Sri Krishna Janmabhoomi to fulfil the wishes of devotees."¹⁰ The books used in these schools hail RSS leaders such as MS Golwalkar and KS Hedgewar. Under systematic attacks, it was found out that in the past few years, the government has formed laws and policies such as NEP (2020) that have hindered the functioning of minority educational institutions. This chapter aims to bring these attacks into the public domain so as to stop such targeted attacks that hinder the growth and development of

8 Nurullah, S., & Naik, P. J. (1943). History of education in India during the British period. Macmillan, Bombay.

9 Webster, A. (1990). The political economy of trade liberalization: the East India Company Charter Act of 1813. *Economic History Review*, 404-419.

10 Ameerudheen, T. (2017, October 26). Protests in Kerala over saffron books in schools, circular calling for a tribute to Sangh leader. Scroll.in. <https://scroll.in/article/855284/protests-in-kerala-over-saffron-books-in-schools-circular-calling-for-a-tribute-to-sangh-leader>

minority educational institutions.

Methodology

Hate speeches against minority institutions are on the rise, and educational institutions belonging to minorities are accused of converting Hindus to their religion (Siddique, 2021).¹¹ There have been several incidents in the past where the members of the right-wing groups have attacked and vandalised minority schools accusing them of religious conversion. Minority educational institutions have often been proclaimed as terrorist hubs which leave a serious on-ground impact on the mental well-being as well as the academic and professional career of their students.¹²

This report is explanatory in nature and only has secondary data seeking the changing scenario for minorities in civic actions and expression. It highlights the cases of attacks on minority educational institutes in light and analyses the trends and patterns of these attacks.

The data collection involves a review of literature from different sources; predominantly newspapers, news websites, and other media organisations. Accounts of restrictions on minority groups and defenders, too, relied on a review of literature, including civil society reports of recent episodes of violence, besides media accounts and interviews.

The chapter is based upon inductive reasoning, which is also considered a 'bottom-up' approach to guide the progress of this study. Inductive reasoning begins with specific observations and assumptions, which are vital for sensing patterns and regularities, discerning irregularities, and eventually proposing a hypothesis that can be further explored leading to the articulation of some general conclusions, and it is mostly based on reviewing various articles, reports and media records.

In this chapter, the researcher has analysed the patterns of targeting Chris-

11 Press Trust of India. (2021, December 7). Right-wing activists vandalise Christian school in Madhya Pradesh, allege students were being converted. Firstpost. <https://www.firstpost.com/india/hindutva-organisations-vandalise-christian-school-in-madhya-pradesh-allege-students-were-being-converted-10191641.html>

12 Sajjad, M. (2018, May 4). Aligarh Muslim University is being accused of fostering 'anti-nationalism' for cheap electoral gains. Economic Times. <https://economic-times.indiatimes.com/blogs/et-commentary/aligarh-muslim-university-is-being-accused-of-fostering-anti-nationalism-for-cheap-electoral-gains/?source=app&frmapp=yes>

tian educational institutions. This chapter has categorised the attacks on these institutions into two types namely: non-systematic attacks and systematic attacks. Under non-systematic attacks, organisations and individuals who are not a part of the government machinery have been listed, whereas systematic attacks include all of those instances where the government and its members are involved.

Non-State Attacks

Non-state actors include individuals and organisations that are not directly associated with the government. This chapter in particular describes non-state actors to several Hindu militant organisations, such as RSS, Hindu Jagran Manch (HJM), and Vishwa Hindu Parishad (VHP). The non-state actors' categories have been made based on the type of attack on Christian educational institutions that include cases of violence, imposition of majoritarian beliefs and targeting the food habits of minorities.

Vandalism/Violence/Attacks on Institutes

There has been a steep rise in the cases of violence against Christian minorities in India that make up 2.3% of the population. According to a report jointly released by three organisations namely, the Association for protection of Civil Rights, United Against Hate, and United Christian Forum around 300 cases of violence have been reported against Christians in nine months of 2021.¹³ Physical attacks on Christian gatherings, educational institutions, and churches have become a common norm. Christian schools in Vidisha and Mumbai were targeted by Hindu Nationalist organisations, claiming that the schools were involved in forced religious conversions. Similarly, Christian schools in Aligarh were threatened to not celebrate Christmas by a Hindu Nationalist organisation. Additionally, countless incidents have occurred in the previous year where attempts were made to stop the Christmas celebrations in various parts of the country by right-wing organisations.

According to Father Pius Malekandathil, a historian, "These attacks have a discernible pattern, and the attempt is to polarize the atmosphere as well as put minorities in their place". He further mentioned, "Hate crimes like targeting visible targets like churches and educational institutions are a

13 Pal, S. (2021, October 3). Over 300 Instances of Violence Against Christians Were Reported in Nine Months of 2021: Report. The Wire. <https://thewire.in/communalism/india-violence-hate-against-christians-hindutva-religious-conversion-report>

way to seek attention and put the scare in the community”¹⁴.

The attacks on the educational institutions have a pattern, where Hindu right-wing blame the educational institutes for indulging in forced religious conversions. The allegations and propaganda of forceful religious conversions have further segregated the minorities and its effect has been noticeably seen through the new anti-conversion laws which have been passed in five states of the country. Uttar Pradesh, India's most populous state, cleared the ordinance on the Uttar Pradesh Prohibition of Unlawful Religion Conversion Law, 2020. The law aims to prohibit unlawful conversion from one religion to another by misinterpretation, force, undue influence, coercion, allurement, or any fraudulent means or by marriage. This controversial law is against various fundamental rights stated in the Indian constitution such as the right to privacy, the right to choice as well as freedom of religion. In Uttar Pradesh, it is mandatory for the religious converter to inform at least one month before the said conversion. When the District Magistrate (DM) receives such information an officer will conduct an inquiry to find out the real reason behind the conversion.¹⁵ Karnataka, Southern Indian state passed an ordinance on anti-conversion that throws the burden of proof on the person who causes the conversion meaning that any person who allegedly ‘allures’ for the conversion will have the burden to prove that she/he wasn’t involved in any form of allurement.¹⁶ This places institutions like Christian schools and colleges in a precarious position and are often targeted by the Hindu right-wing for being falsely accused of forced conversion.

A catholic school, St Joseph's, was attacked in December 2021, by a group of 300 right-wing men, in Ganj-Basoda, Madhya Pradesh. As per the principal of the school, the mob was chanting ‘Jai Shree Ram’ (Hail to Lord Ram) as they were attacking the school (Siddique, 2021). According

14 Krishnan, M. (2021, December 30). Why are attacks on Christians increasing in India? DW. <https://www.dw.com/en/why-are-attacks-on-christians-increasing-in-india/a-60293867>

15 Patel, A. (2020, February 12). The Uttar Pradesh Prohibition of Unlawful Conversion of Religion Ordinance 2020. PRS India. https://prsindia.org/files/bills_acts/bills_states/uttar-pradesh/2020/UP%20Prohibition%20of%20Unlawful%20Conversion%20of%20Religion%20Ordinance,%202020%20.pdf

16 Narrain, A. (2022, May 25). Karnataka's New Anti-Conversion Law Will Further Embolden Hindu Extremists Against Minorities. Article14. <https://article-14.com/post/karnataka-s-new-anti-conversion-law-will-further-embolden-hindu-extremists-against-minorities-628d90704f15d>

to eyewitnesses, stones were thrown at the school building by the mob. This mob was led by Vishwa Hindu Parishad VHP has claimed that they planned a ‘peaceful protest’ in front of the school. Members of VHP, Bajrang dal Hindu Jagran Manch, accused the school of illegally converting the students of the school to Christianity.¹⁷ The school administration also asked the police to provide protection, however, they failed to stop the attack. “Local SHO assured us of adequate safety, but the next day only a handful of cops were there outside the school who were not able to control the large mob which went on a rampage”, stated Father Joselee Cyrokave, Priest of St Joseph.¹⁸

A similar incident was carried out in Mumbai in 2019, where a Christian run school was targeted by individuals associated with the VHP. They accused the school of forceful religious conversion. A banner was also placed outside the school that warned the parents of religious conversion in the school. However, it was not the first time the school was targeted. Similar allegations and attacks were made in February 2019 as well. Most of the students in the school come from economically weaker sections of society.¹⁹

In another incident that occurred in April 2019, a catholic school was set on fire in Sugnu city, about 70 km away from the capital Imphal, in Manipur. Property of over ₹35 lakh was damaged. The director of the Catholic Education Society remarked, “It is a deeply painful and unfortunate event that the temple of learning, the harbinger of hope could be so brazenly reduced to ashes by some unscrupulous people in the society.”²⁰

In 2015, a mob attacked Holy Child Auxilium School. It is a Christian

17 Press Trust of India. (2021, December 7). Right-wing activists vandalise Christian school in Madhya Pradesh, allege students were being converted. Firstpost. <https://www.firstpost.com/india/hindutva-organisations-vandalise-christian-school-in-madhya-pradesh-allege-students-were-being-converted-10191641.html>

18 Goyal, P. (2021, December 14). Behind attack on MP school, Hindutva outfit's conversion claim, NCPDR letter, and a YouTube channel. NewsLaundry. <https://www.newsLaundry.com/2021/12/14/behind-attack-on-mp-school-hindutva-outfits-conversion-claim-ncpdr-letter-and-a-youtube-channel>

19 Nair, S. (2019, April 25). Mumbai: School attacked over conversion claims. Times of India. <https://timesofindia.indiatimes.com/city/mumbai/school-attacked-over-conversion-claims/articleshow/69032095.cms>

20 Leivon, J. (2019, April 26). Manipur: Catholic school set on fire; two student leaders held. The Indian Express. <https://indianexpress.com/article/north-east-india/manipur/manipur-catholic-school-set-on-fire-two-student-leaders-held-5695272/>

school in the Vasant Vihar neighbourhood of New Delhi. After the event, the school was closed, and the students were sent home. Holy Child Auxilium Institution is a well-known Delhi school with some prominent alumni, including Smriti Irani, the BJP's current Minister of Textiles.

These assaults on the educational institutes leave a significant impact on students, teachers along with the school administration. On 6th December, 2021, when St Joseph School was vandalised, 14 students were inside the school premises appearing for the examination. One of the students stated, "We were given five minutes extra to finish our paper later, but we could not concentrate."²¹

Imposition of Majoritarian Practices

There have been several cases reported in recent years where minority educational institutions have been warned by right-wing activists to not celebrate Christmas or place idols of Hindu gods on the school campus.²² These incidents are evidence that these education institutions are targeted time and again to impose the beliefs of the majority community. This is strongly indicative of the ideology of Indian right-wing organisations originating from the views of MS Golwalkar (founder of RSS) who proclaimed that Muslims and Christians cannot co-exist with the Hindu majority, and they either must convert to Hinduism or must live as second-class citizens in the country.²³

In 2017, Christian schools in Aligarh were warned by Hindu Jagran Manch to not observe Christmas. Sonu Savita, an HJM leader, alleged that in these Christian schools Hindus were in minority, and celebrating Christmas is a subtle way to tell the children about Christianity. The HJM leader threatened that if any school celebrates Christmas, then it would be considered an act of promoting Christianity and imposing their religious

21 Johari, A., & Iyer, A. (2022, February 3). Right-wing Hindu groups hijack India's child protection body. Quartz. <https://qz.com/india/2121687/right-wing-hindu-groups-hijack-indias-child-protection-body/>

22 Jaiswal, A. (2017, December 17). Hindu Jagran Manch warns Christian schools against celebrating Christmas. Times of India. <https://timesofindia.indiatimes.com/city/agra/hindu-jagran-manch-warns-christian-schools-against-celebrating-christmas/articleshow/62097882.cms>

23 Abraham, B. (2021, October 27). Install Idol Of Goddess Saraswati On The Campus, Christian School In MP's Satna Gets Ultimatum. Indiatimes. <https://www.indiatimes.com/news/india/install-idol-of-goddess-saraswati-on-the-campus-christian-school-in-mps-satna-gets-ultimatum-552649.html>

habits on Hindus.²⁴

In December 2021, Several men wearing saffron scarves barged into Karnataka schools to stop the Christmas celebrations.²⁵ The mob threatened the administration and accused them of 'ignoring Hindu gods' and 'introducing Christianity to Hindu students.'

These incidents are not just restricted to Christmas. Christian schools across the country are under constant threat from Hindu vigilante groups. There have been several cases reported in the past where Hindu nationalists have threatened schools to place the idol of the Hindu god on the campus, to chant Hindu prayers in school instead of Christian prayers, forcing the schools to celebrate Hindu festivals and not to celebrate Christmas (Abraham, 2021).

On January 4 2018, around several hundred members of Akhil Bharatiya Vidyarthi Parishad (ABVP) student wing of the RSS gathered outside St Mary's postgraduate college in Vidisha, Madhya Pradesh to worship inside the college.²⁶ The mob wanted to recite 'Bharat Mata Arti' to instil 'patriotism' among students. After the Director of the college refused the same, hundreds of ABVP members gathered around the college.²⁷

In another incident in October 2021, around 30 members of Vishwa Hindu Parishad (VHP) and Bajrang Dal allegedly gave an ultimatum to a Christian management school in Satna, Madhya Pradesh, to install an idol of Hindu Goddess Saraswati on the campus within 15 days.²⁸ They also

24 Outlook Web Bureau. (2017, December 17). Hindu Jagran Manch Warns Aligarh Christian Schools Against Celebrating Christmas, Calls It 'Step Towards Forced Conversion'. Outlook India. <https://www.outlookindia.com/website/story/hindu-jagran-manch-warns-aligarh-christian-schools-against-celebrating-christmas/305654>

25 Rakesh, K. M. (2021, December 26). Saffron bullies spoil Christmas celebrations in Karnataka schools. The Telegraph. <https://www.telegraphindia.com/india/saffron-bullies-spoil-christmas-celebration-in-karnataka-schools/cid/1844868>

26 Express News Service. (2018, January 5). Madhya Pradesh: ABVP members create ruckus over Bharat Mata aarti. Indian Express. <https://indianexpress.com/article/india/madhya-pradesh-abvp-members-create-ruckus-over-bharat-mata-aarti-5012199/>

27 Vivek. (2018, January 4). ABVP Clashes with Police After Being Denied Permission to Recite Bharat Mata Aarti in MP College. News18. <https://www.news18.com/news/india/abvp-clashes-with-police-after-being-denied-permission-to-recite-bharat-mata-aarti-in-mp-college-1623159.html>

28 Abraham, Bobins. (2021, October 27). Install Idol Of Goddess Saraswati On The Campus, Christian School In MP's Satna Gets Ultimatum. Indiatimes. <https://www.>

threatened the administration by stating, “If the school failed to install it, we will install it.” (Abraham, 2020)

In February 2021, the local administration of Dadra and Nagar Haveli and the Daman-and-Diu States forced children of all the schools, irrespective of their faiths, to celebrate Vasant Panchami.²⁹ The local administration demanded from all the schools to organise activities to celebrate Vasant Panchami on 16 Feb 2021. On the next day, the schools were asked to share activity reports along with photos to certify that the festival was actually celebrated in the schools. The coordinator of the United Christian Forum (UCF) described the behaviour of the local administration as one that, “seriously undermined the freedom of religion and the freedom to establish and administer educational institutions prerogatives guaranteed by the Indian Constitution, as a guarantee for all religious minorities.”³⁰

A new form of segregation is witnessed across the country where division is based on what people eat. Time and again BJP ministers are found making absurd comments about non-veg food. Such degrading remarks by prominent ministers have serious on-ground implications. Although the encouragement of vegetarianism and seeing non-vegetarianism as something outside the Indian society and culture cannot be viewed in isolation. It should be analysed and viewed as a part of internalised casteism and Brahmanism. It is important to understand the ideology that lies in the very roots of this nation. Brahminism can be viewed as a system of belief or ideology that was formed in the Vedic period. Brahmanism places Brahmins on the topmost tier of society.³¹ They are considered to be more knowledgeable and pure. They believe in superiority by birth. Anyone who is a Brahmin is naturally above all the other individuals. None can convert into Brahmin rather one is a Brahmin by birth. The Shudras occupy the lowest position in this social tier. The social hierarchy with Brahmins being on the top makes them superior to everybody giving them all the power and privilege. This social hierarchy normalises the power,

indiatimes.com/news/india/install-idol-of-goddess-saraswati-on-the-campus-christian-school-in-mps-satna-gets-ultimatum-552649.html

29 Vasant Panchami is a pagan festival to honour the goddess Sarasvati.

30 FSSPX.NEWS. (2021, March 1). India: Christian Schools Targeted by Hindu Nationalists. FSSPX.News. <https://fsspx.news/en/news-events/news/india-christian-schools-targeted-hindu-nationalists-64604>

31 Ambedkar, B. R. (1948). *Untouchables: Who were they and why they became untouchables*. Amrit Book Company, New Delhi.

prestige, and position that Brahmins enjoy in society. Brahminism strictly restricts social mobility meaning no one can interchange their caste by choice, one can only belong to a certain caste by birth. This social immobility doesn't only put a restriction on individual freedom but also sows the seeds of injustice.

Gradually, vegetarianism was considered pure, and non-vegetarianism started to be seen as impure. Today's beef ban, ban of eggs and non-veg food in schools and other public places is nothing but an attempt to impose upper caste culture and divide people based on their food habits where non-veg eaters namely Muslims and Christians are seen as 'them' and vegetarians are seen as 'us.'

In January 2020, Rajendra Trivedi, a member of the BJP while attending a celebration at the Shree Narayana cultural mission in Ahmedabad stated, "Indian culture (Bharatiya Sanskriti) says that we should not eat non-vegetarian food. We should be vegetarian."³² Apart from making comments about non-vegetarian food he also made the students of the school promise to not eat non-vegetarian food. He believes that eating non-vegetarian food is "not a part of Bhartiya Sanskriti (Indian culture)".³³ In 2014, Vinay Bihari, another BJP minister from Bihar commented that mobile phones and non-vegetarian food are the reason for the rise in cases of rape.³⁴ In 2021, Ahmedabad municipal corporation's planning committee mentioned that the stalls selling non-vegetarian food items will not be allowed along the public roads and within a 100-metre radius of colleges, schools, and religious places.³⁵ However, the Gujarat High Court asserted that the Ahmedabad civic body cannot stop people from eating non-vegetarian food.[28]

32 Express News Service. (2020, January 5). Gujarat Assembly Speaker makes school students promise not to eat non-veg food. The Indian Express. <https://indianexpress.com/article/cities/ahmedabad/gujarat-assembly-speaker-makes-school-students-promise-not-to-eat-non-veg-food-6199976/>

33 *ibid.*

34 PTI. (2014, July 16). Now, Bihar minister says mobiles, non-vegetarian food encourage rape. Times of India. <https://timesofindia.indiatimes.com/india/now-bihar-minister-says-mobiles-non-vegetarian-food-encourage-rape/articleshow/38432306.cms?from=mdr>

35 Scroll Staff. (2021, December 10). You cannot stop people from eating non-vegetarian food, Gujarat HC tells Ahmedabad civic body. Scroll.in. <https://scroll.in/latest/1012483/you-cannot-stop-people-from-eating-non-vegetarian-food-gujarat-hc-tells-ahmedabad-civic-body>

In December, 2021, in Balgalkot, St. Paul’s higher primary school was closed after a Hindu group raised their objection against non-vegetarian food being served at school as a part of the Christmas celebration.³⁶ The group also claimed that the school indulged in conversion. Submitting to the pressure from the right-wing groups, the local block education officer had to temporarily close the school.³⁷ A man by the name of Pradeep Amarrannavar filed a complaint against the school accusing them of conversion, serving non-vegetarian food, and that the school was forcing parents to remove pictures of Hindu gods from their houses.³⁸ These claims were made without any evidence. Moreover, the block resource coordinator of the education department, I.M. Angadi conducted a survey at the school and according to the report, the Christian celebration event was held on Saturday which is a non-working day. He said, “For the unlawful program at the school, the school’s chief is directly responsible. Complaints have come from the public and several organisations. Also, this has been aired in the media too. Because of this, the department has been embarrassed. This behaviour is saddening.” The school has been temporarily closed until further orders.³⁹

Non-vegetarian food has become yet another reason for right-wing groups to attack minority educational institutions in India.

Systemic Attacks

State attacks include various laws and actions taken by the government that are directly or indirectly affecting Christian educational institutions. Ever since BJP gained power in 2014, several laws and policies have been made and amended such as New Education Policy, 2020, Foreign Contribution Regulation Act (FCRA), Gujarat Secondary and higher secondary education (amendment) act, 2021, and so on have affected the Christian educational institutions one way or the other. The focus of this part of the

36 News Desk. (2022, January 1). School Shut for Serving Meat, Families Questioned for 'Converting': K'taka Right Wing Groups Take On Minorities During Christmas. News18. <https://www.news18.com/news/india/school-shut-down-for-serving-meat-women-questioned-for-converting-ktaka-right-wing-groups-take-on-minorities-during-xmas-celebrations-4611455.html>

37 *ibid*.

38 Rao, S. (2021, December 31). Karnataka edu dept shuts school for 'serving non-veg food' on Christmas. The News Minute. <https://www.thenewsminute.com/article/karnataka-edu-dept-shuts-school-serving-non-veg-food-christmas-159355>

39 *ibid*.

chapter is to highlight how the actions of the state are affecting Christian institutions. Article 30 gives all minorities in India the right to establish and administer their educational institutions yet attempts have been made to interfere with the working of minority institutions.

National Education Policy, 2020

New National Education Policy (NEP) was one of the promises by the BJP government when it won elections in 2014. It is important to note at this point that the New Education Policy, 2020 wasn't discussed with the state governments before it was approved by the union cabinet. While the policy addresses some key issues in the education system of India focusing more on gross enrolment ratio, vocational education, humanistic vision of education, and promoting mother-tongue language yet the policy is non-inclusive when looked upon from the perspective of religious minorities in India.⁴⁰

After the draft of NEP was released in 2019, minority educational institutions were seen protesting against the policy.⁴¹ They dubbed the policy a route to the centralization of powers. The protesting group remarked that an apex body to monitor schools was bound to work with favouritism and prejudice. Besides, they also asserted that the contribution of the Christian minority was completely ignored in the policy.⁴²

While the policy heavily boasted of making India into “a global knowledge superpower”, the word minority is mentioned only three times in the 62-page long document. There is little to no detail on religious minority institutions. The policy neither contained any details about the education of religious minorities and religious/faith-based schooling nor on the functioning of religious minority educational institutes, thereby completely excluding religious minorities from the educational policy. (Ministry of Human Resource Development, 2020)

Another point of concern is that while the policy considers the contribu-

40 Ministry of Human Resource Development. (2020). National Education Policy 2020. Ministry of Education. https://www.education.gov.in/sites/upload_files/mhrd/files/NEP_Final_English_0.pdf

41 Special Correspondent. (2019, July 29). Minority educational institutions stage protest against NEP. The Hindu. <https://www.thehindu.com/news/cities/Coimbatore/minority-educational-institutions-stage-protest-against-nep/article28750710.ece>

42 *ibid*.

tion of ancient India to education in India, it stays silent on the contribution of the mediaeval period, the British and post-independence period.⁴³ The policy completely turns a blind eye toward the contribution of Muslims and Christians during the Mediaeval (1100-1750 AD), British, and post-independence eras. Christian missionaries have immensely contributed to modern education during the British as well as post-independence era and policy has completely ignored their contribution.⁴⁴

The new education policy in 2020 shows a shift towards centralization of the education system in the country. Concerns are that the over-centralization will disturb the federal polity. The over-centralization will affect minority educational institutions.⁴⁵ There are concerns over how NEP 2020 will affect the reservation of seats, allocation of funds, and maintenance of the standard of education in different states.⁴⁶

Foreign Contribution Regulation Act (FCRA), 2020

In 2020, the BJP government put forward a Foreign Contribution (Regulation) Amendment Bill (FCRA) which became an act in September 2020. FCRA (2020) has been severely criticised on various grounds by human rights groups and minorities in India. The United Nations High Commissioner, Michele Brachete stated that FCRA is “being used to deter or punish NGOs for human rights reporting and advocacy”. Opposition parties, the National Human Rights Commission, and members of civil society have also issued notice to the home ministry observing that the non-renewal of the FCRA licence was not illegal.⁴⁷

FCRA can be seen as another tool being used to target educational institutes and NGOs, especially those who are critical of the policies of the cur-

43 India Tomorrow. (2020, September 6). National Education Policy-2020 is silent on minorities’ educational issues: Webinar. India Tomorrow. <https://indiatomorrow.net/2020/09/06/national-education-policy-2020-is-silent-on-minorities-educational-issues-webinar/>

44 *ibid.*

45 Ahmed, S. T. (2020, September 1). NEP 2020 through Muslim prism. India Tomorrow. <https://indiatomorrow.net/2020/09/01/nep-2020-through-muslim-prism/>

46 *ibid.*

47 Office of the High Commissioner for Human Rights. (2020, October 20). Bachelet dismayed at restrictions on human rights NGOs and arrests of activists in India. OHCHR. <https://www.ohchr.org/en/press-releases/2020/10/bachelet-dismayed-restrictions-human-rights-ngos-and-arrests-activists-india?LangID=E&NewsID=26398>

rent government. In December 2021, FCRA registration was cancelled for the Missionaries of Charity (MoC). Missionaries of Charity is a religious congregation that was established by Mother Teresa in 1950. The organisation takes care of refugees, the mentally ill, sick and abandoned children, people with AIDS, and elderly people. The NGO also has schools run by volunteers that focus on imparting education to street children. After much outrage, the organisation was issued a new FCRA licence that will be valid by 2026.⁴⁸

Several renowned educational institutes in the national capital have also been targeted under the new FCRA legislation. Registrations of around 5789 entities ceased in January this year. IIT Delhi, Oxfam India, Indira Gandhi National Centre for arts, Jamia Millia Islamia, Nehru Memorial Museum and Library, and Lady Shri Ram College are amongst those whose licence has been ceased.⁴⁹

Among the 2257 NGOs that are of a religious nature and for whom FCRA licence is not valid anymore as of 2nd January, 2022, - 1626 of them are running social programs for Christians.⁵⁰ Therefore around 72% of the NGOs that are of religious nature belong to Christians.⁵¹ The sudden expiry of licences of various NGOs and educational institutes has brought in a lot of criticism.

Appointment of Teachers

According to Article 30 of the Indian Constitution, all minority communi-

48 Kaushik, K. (2022, January 9). FCRA registration of Missionaries of Charity renewed, valid till 2026. The Indian Express. <https://indianexpress.com/article/india/fcra-registration-of-missionaries-of-charity-renewed-7712623/>

49 PTI. (2022, January 1). Delhi's top educational institutes among 5,789 entities whose FCRA licence deemed to have ceased. The Print. https://theprint-in.cdn.ampproject.org/v/s/theprint.in/india/delhis-top-educational-institutes-among-5789-entities-whose-fcra-licence-deemed-to-have-ceased/793083/?amp_js_v=a6&_gsa=1&usqp=mq331AQKKAFArABIIACAw%3D%3D#aoh=16450513267783&referrer=https%3A%2F%2Fwww.google.com&_tf=From%20%251%24s&share=https%3A%2F%2Ftheprint.in%2Ffindia%2Fdelhis-top-educational-institutes-among-5789-entities-whose-fcra-licence-deemed-to-have-ceased%2F793083%2F

50 Rao, S. (2022, January 2). FCRA overhaul: Major blow for Christian NGOs; 70% religious NGOs 'deemed to have ceased' aligned to Christian programmes. The CSR Universe. <https://theCSRUniverse.com/articles/fcra-overhaul-major-blow-for-christian-ngos-70-religious-ngos-deemed-to-have-ceased-aligned-to-christian-programmes-51> ibid.

ties have the right to establish and administer educational institutions of their choice. However, in the last few years, attempts have been made by several states in India to control the administration of minority institutions.

The Gujarat Secondary and Higher Secondary Education (Amendment) Act, was passed in March 2021.⁵² The Act makes it mandatory for minority institutions to appoint teachers and principals who have cleared the Teachers Aptitude Test (TAT) at Secondary and Higher Secondary schools. Therefore, the minority institutes will have to follow the same procedure for the selection and appointment of teachers and principals as carried out in government-run schools. This act makes it mandatory for minority institutions to follow a centralised recruitment policy as prescribed by the state government. According to the state government records, this act will impact 397 secondary and higher secondary schools that are run by minorities. According to the government, the act has been enacted to enhance the ‘academic standards’ at minority institutions.⁵³ The act was then challenged in the Gujarat High Court by a body of 181 secondary and higher secondary schools across the state, which included, the Catholic Church of the state, and father Teles Fernandes, who is the secretary of Gujarat Education Board of catholic institutions.⁵⁴ The petitioners are concerned that after the act is passed, they will not be left with any authority regarding non-teaching staff, teachers, and principals. The act no longer allows the minority institutions to follow the No objection certificate (NOC) from the Gujarat secondary and higher secondary education board, which was allowed before. (Sharma, 2021)

Targeting Of Schools

There have been some cases where the government authorities have tried to shut down Christian educational institutions. In 2018, Mount Carmel

52 Express News Service. (2021, April 1). Amendment Bill Passed: Minority schools to hire faculty through centralised process. The Indian Express. <https://indianexpress.com/article/cities/ahmedabad/amendment-bill-passed-minority-schools-to-hire-faculty-through-centralised-process-7253629/>

53 Express News Service. (2021, April 1). Amendment Bill Passed: Minority schools to hire faculty through centralised process. The Indian Express. <https://indianexpress.com/article/cities/ahmedabad/amendment-bill-passed-minority-schools-to-hire-faculty-through-centralised-process-7253629/>

54 Sharma, R. (2021, June 21). Explained: Why have minority schools challenged Gujarat’s amended education Act?. The India Express. <https://indianexpress.com/article/explained/gujarat-education-act-provisions-high-court-challenge-7360046/>

School, Delhi, which is a renowned school in the national capital with a reach of around 3000 children, was placed under scrutiny by the Directorate of Education (DoE). The DoE claimed that the school was under scrutiny due to a continuous rise in fees, without issuing any proper notice to the parents. However, principal Michael Williams stated that the school is a private minority institution and has the freedom to self-regulate. The school received a notice that the decrees of the school will not be valid thereby risking the future of 250 teachers and almost 3000 children. Principal Michael Williams also said that “every Indian state has its own local educational law. The only schools that can be managed freely and independently are those of minorities, as laid out in article 30 of the Indian constitution.”

In another incident in 2017, a catholic college was closed in Madhya Pradesh.⁵⁵ The catholic mission catered to the poor tribals for two decades. According to the District Administration, it closed down the college with the allegation that it didn't have any permits and was built on land that it didn't own. Hindu nationalists on the other hand accused the college of forcibly converting the young tribals of the area. The Bishop of Sagar claimed that the police conducted investigations and found out that the accusation of converting 200 people was false and that the land on which the college was built belonged to the church (Carvalho, 2017). The priest, Father Siljo Kidangan, mentioned that the administration should give some time to rectify their error because their property wasn't encroached on land. The administration of the Guna district sealed the school. The police arrived at the school at night with 5 jeeps filled with members of RSS, VHP, and Hindu nationalists. The boarding school was sealed and students were shifted to a government school. (Carvalho, 2017)

Conclusion

According to a study by NCPCR, Christian have around 71.96% of total religious minority schools in India.⁵⁶⁵⁷ Thus Christian educational insti-

55 <https://www.asianews.it/news-en/Catholic-college-closed-down-in-Madhya-Pradesh.-Bishop-of-Sagar:-They-want-to-drive-out-Christians-41829.html>

56 <https://timesofindia.indiatimes.com/home/education/news/muslim-minority-schools-account-for-22-75-pc-of-religious-minority-schools-christian-community-schools-at-72-pc-ncpcr/articleshow/85213596.cms>

57 Roy, E. (2021, August 12). NCPCR survey finds gaps, warns all minority schools under RTE. The Indian Express. <https://indianexpress.com/article/education/ncpcr-survey-finds-gaps-wants-all-minority-schools-under-rte-7448006/>

tutions play a huge role in framing the education system of the country. However, in recent years a distrusting trend has emerged. These institutions are targeted time and again which is affecting their growth and development. The researchers categorised the attacks on Christian institutions into systematic and non-systematic attacks where the government has an upper hand in the former whereas Hindu right-wing organisations have played a major role in the latter. Ever since the BJP came to power in 2014, it has enacted various laws and policies that are hampering the functioning of these minority institutions. Although article 30 of the Indian constitution gives minorities the right to establish and manage their educational institutions. It was also observed that Hindu right-wing organisations like Rashtriya Swayamsevak (RSS), Hindu Jagran Manch (HJM), Bajrang Dal and other organisations are involved in cases of violence against Christian-run institutions. These incidents not only impact the growth of the educational institutions but also severely affects the mental well-being of students and teachers and also affect the dignity of the community. The attacks on these institutions should not be seen in isolation. These attacks are a part of the larger persecution of minorities in India especially Christians and Muslims.

Gendered Islamophobia in India: Targeted hate violence against Muslim women

Nidha Parveen and Nada Nasrin

In post-colonial India, the Muslim minority has long suffered systemic discrimination, low socioeconomic status and negligible representation in public life. Over 31 percent of India's 200 million Muslims live below the poverty line.¹ For the first time since independence, India's union government has no Muslim representation and India's ruling party has no Muslim member in the Indian parliament.² Furthermore, Muslim women in India are more marginalised than ever in all forms of social indicators. In fact, Muslim women are among the poorest, the most educationally disenfranchised, the most economically vulnerable and the least politically visible group in India.³

The conversations in the mainstream academia and media regarding Muslim women in India have been stereotypically discourteous and monolith - that of forcefully covered oppressed beings, lacking voice, agency, or freedom always under the 'control' supposedly stemming from the fundamentalist tendencies of the men of the Muslim community and the faith they adhere to. The such public characterisation is unsurprisingly in line with the colonial construction of Muslim women in modern western traditions, so much so that the discourses around Muslim women have time and again hinted that 'Muslim woman' has been an important field of inquiry and exploration, especially for the Orientalists⁴, resulting in a continuous misrepresentation of West Asian women who are continuously portrayed through a binary; either as exotic women who are hypersexualized in imagery or as docile, unvoiced women.⁵

Recent Islamophobic trends in India have scarcely divulged from its historically homogeneous terror narratives in which the Islamic concept of Jihad was weaponised against Muslims. New Islamophobic narratives demonise Muslims with unfounded allegations and myths such as spitting on food,

1 31% Muslims live below poverty line: NCAER Survey. (2010, March 28). Times of India. <https://timesofindia.indiatimes.com/india/31-Muslims-live-below-poverty-line-NCAER-survey/articleshow/5734846.cms>

2 Kuchay, B. (2022, July 6). India ruling party has no Muslim MP for the first time in history. Aljazeera. <https://www.aljazeera.com/news/2022/7/6/india-ruling-party-has-no-muslim-mp-for-the-first-time-in-history>

3 Status of Muslim Women. (2015, February 15). www.pib.gov.in. <https://www.pib.gov.in/newsite/PrintRelease.aspx?relid=115891>

4 Orientalists is the noun form of the term "orientalism" refers to the Orient, in reference and opposition to the Occident; the East and the West, respectively.

5 Khan, Muhammad & Zahra, Sadaf. (2016). Portrayal of Muslim Women by Western Print Media: A Textual Analysis in Feministic & Orientalist Perspective. 17. 41-57.

rapists, among others.⁶ In fact, it has retained its attack and sexualization of Muslim women's bodies further and through newer mechanisms, and of blurring lines between online and offline violence. The spiral violence stems from a voyeuristic gaze on Muslim women, their lives and bodies. Violence against muslim women follows a pattern, sexual in nature, its construction, occurrence, impact, and recurrence is similar for example in Gujarat and Muzzaffarnagar, rape was weaponised to subjugate muslim women. Even online attacks stem from a hyper-sexualization of muslim women. Most vocal Muslim women in India receive threat messages and intimidation on social media, largely sexually explicit in nature and especially by individuals openly associated with Hindu right-wing groups. Hate speech aggression and sexual assault against Muslim women are on the rise- so much so that Rana Ayyub, one of the most vocal critics of the current government is also one of the most harassed journalists in the world.⁷ The last decade has seen an extremely brutal form of anti-Muslim propaganda in India; and relentless disinformation vis a vis those who practice Islam has impacted the everyday lives of Muslims. This has had specific and more targeted implications for Muslim women, as they face the double burden of gender and belonging to a religious minority which is commonly referred to as Gendered Islamophobia. Gendered Islamophobia, as per community definitions, is the ways in which the state utilizes gendered forms of violence, to oppress, monitor, punish, maim and exercise control over Muslim women's bodies. These negative social constructions also portray Muslim women as terrorists, terrorist sympathisers on one hand, and on the other as inherently oppressed. They also depict Muslim women as cultural representatives of Islam and Muslim communities, which is mostly the reason why the bodies of Muslim women and girls are considered sites of domination and control.⁸ The assumed lack of freedom and agency is ironically never seen from the perspective of muslim women. It is assumed that they are indoctrinated or subjugated to any or all the choices or freedom they make or exercise. Muslim women are considered victims with no mind of their own, a prime example and symptom of such assumption is the case of Hadiya, when her marriage was nullified by Ker-

6 "Thook Jihad" Decoded: Why Muslims spit on foods. (2021, November 25). trueneews-india.com. <https://truenewsindia.com/thook-jihad-why-muslims-spit-on-food/>

7 Cadwalladr, C. (2022, February 27). Reviled, harassed, abused: Narendra Modi's most trenchant critic speaks out. The Guardian. <https://www.theguardian.com/world/2022/feb/27/reviled-harassed-abused-narendra-modis-most-trenchant-critic-speaks-out>

8 Raja, D., Pirzada, S., & Zahzah, Y. (2020). Partnership to End Gendered Islamophobia. HEART. <https://hearttogrow.org/wp-content/uploads/2021/01/Final-GI-Report.pdf>

ala high court which remarked she was “weak and vulnerable” and was an easy target for exploitation.⁹ The supreme court later restored her marriage but the presupposition that Hadiya was susceptible to brainwashing and did not know if the marriage was a right choice, highlights the fact that muslim women’s agency and freedom is only for others to assume and dictate and what it should and should not be.

Muslim women are subjected to a popular oriental imagination of ‘mysterious and sexualized woman’, ‘the oppressed Muslim woman,’ and ‘the militant Muslim woman,’ that renders them vulnerable to harassment and violence.¹⁰ Islamophobic violence experienced by Muslim women is distinct from the violence perpetrated against Muslim men, which is also different from the gendered violence experienced by other women.¹¹ Gendered islamophobia is also the utilization of gendered forms of violence to oppress, punish and control Muslim bodies. Indeed, the focal point of Muslim women isn’t new to India in particular or to Global Islamophobia in general.

Recently, in 2021, the Union Ministry of Indian Affairs announced that Muslim Women’s Rights Day will be observed across the country on 1st August to “celebrate” the enactment of the legislation which criminalises Triple Talaq.¹² The passage of the Muslim Women (Protection of Rights on Marriage) Act or the Triple Talaq Law has spewed debates on Muslim women’s rights and liberation. The intention of this stringent law¹³ is to criminalize Muslim men (Agnes, 2018). Raising the ‘woman question’ (Soubani, 2021) has been a colonial tool for rationalising and expanding invasion over any community. Another important aspect to note, is that the legislation was passed in a hurry, while several Muslim women’s collectives and advocates of human rights stood vehemently opposed to the

9 Hadiya case: Courts cannot annul marriage between two consenting adults, says Supreme Court. (2021, December 3). The Hindu. Retrieved September 27, 2022, from <https://www.thehindu.com/news/national/hadiya-case-courts-cannot-annul-marriage-between-two-consenting-adults-says-supreme-court/article61480224.ece>

10 Khan, Muhammad & Zahra, Sadaf. (2016). Portrayal of Muslim Women by Western Print Media: A Textual Analysis in Feministic & Orientalist Perspective. 17. 41-57.

11 *ibid*

12 The act prohibits pronouncement of talaq by a Muslim husband upon his wife, by words, either spoken or written or in electronic form or in any other manner.

13 Triple talaq is a non-bailable offence and cognizable crime with an imprisonment up to 3 years including fine.

criminalization of divorce.¹⁴ The voices of the very women the act supposedly ‘saves’ were deliberately silenced.

This chapter is an outlook on the gendered experiences of islamophobia faced by Indian Muslims in its nation. The chapter intends to unfold the progress and propaganda of Hindutva, and Hindu Nationalist narratives in subjugating, weaponizing and more often than not sexualising Muslim women.

Since the inception of Hindutva ideology, Muslim women’s body has been a site of inexhaustible violence for Hindu men. Sangh sustains a perpetual fear in the nation's psyche about insatiable myths about Muslim men’s lust for ‘vulnerable’ Hindu women to justify the rape and humiliation of Muslim women and thereby maintain anti-Muslim policies. The idea of Hindu nationalism rests in itself in the construction of ‘The Other’; the Muslim enemy. By symbolic victimisation of Hindu women and alleged ‘action-reaction’ discourse, they created a war of hatred against Muslim women’s bodies. Hate speeches that call for violence directed at Muslim women have a reoccurring action-reaction narrative. Uttar Pradesh’s Chief Minister, Ajay Singh Bisht, was heard in a provocative video exhorting his supporters that if one Hindu women is forcefully converted then Hindu men should marry hundred Muslim women.¹⁵

Hindu Nationalism and its obsession with Muslim women’s bodies

One of the key motives behind threats of sexual violence orchestrated by Hindu Nationalism is the patriarchal construct that Hindu men is to dishonour Muslim men, which underlies the misogynic notion of sexual violence as an insult to the men of the community who are perceived as “natural protectors and providers” of the women. The hate-filled utterances attacking female bodies are considered by the structured patriarchal system as an attack on the honour of the corresponding community.

Tanika Sarkar (2002) in her work, *The Semiotics of Terror* points out how violence against Muslim women is understood to be a sign of ‘collective

14 The Wire Staff. (2019, July 31). 'Complete Charade': Activists, Civil Society Groups Condemn Triple Talaq Bill. *The Wire*. <https://thewire.in/communalism/triple-talaq-bill-muslim-women>

15 Love Jihad row: Yogi Adityanath’s hate speech caught on camera. (2014, April 27). *www.indiatoday.in*. <https://www.indiatoday.in/india/story/love-jihad-row-yogi-adityanath-provocative-speech-205846-2014-08-27>

dishonouring.’ She further explains that Hindu men swoop down on Muslim women's bodies to possess and dishonour them and their men, to taste Muslim masculinity, and symbolically destroy the sources of pleasure, reproduction, and nurture for Muslim men and Muslim children. Moreover, by brutally beating and physically killing female bodies and children, attempts to signify an end to Muslim growth.

Above all, it is the Islamophobic notion of ‘othered’ men as a sexual ‘threat’ and ‘othered’ women as sexual objects or property that carries the Hate violence against Muslim women and men. RSS’s anti-Muslim propagandas such as, ‘Population Jihad’ and ‘Love Jihad’ are the subsequent reactions to this. Sara K Faris explains this in terms of the sexualization of Racism:

“Racist ideologies express the desire to dominate the Other through the fantasies of possessing the body of the racialized woman and of sexually humiliating the racialized man.” (Farris, 2017)

It is the formula of "Let's win over the women and the rest will follow" (Fanon, 1994). Thus Muslim women become the site of Hindutva violence within the patriarchal Hindu nationalism.

Hindu Nationalists then have constructed conspiracies such as the ‘Love Jihad’, claiming Muslim men are waging Jihad by luring Hindu women to Islam to outnumber and humiliate Hindu men. There has been extensive use of other propaganda such as the ‘population Jihad’ that suggests that Muslims are burdening India with the population explosion. The targeted attack and conspiracy of ‘love jihad’ and ‘population jihad’ is established through the strategic stigmatisation of dark sexual obsession about allegedly ultra-masculine Muslim male bodies and over-fertile Muslim female ones.

The decades of consistently expressing ‘anxieties’ by the Hindu groups over the protection of chastity of Hindu women (who constitutes the figure of ‘national women’) from the gaze of ‘other men’ and efforts to rein the Muslim women’s ‘fertility’ from population exploitation have conveniently legitimized the call for genocides. Right before the anti-Muslim pogrom broke out in Gujarat in 2002, Hindutva outfits resorted to circulating several leaflets signed by the then state general secretary of the VHP, Chinubhai Patel. One of the many pamphlets titled ‘Jehad’¹⁶ called for raping

16 Editors. (2002). Pamphlet Poison. Sabrang. <https://www.sabrang.com/cc/ar->

Muslim women, and read, “We have widened the tight vaginas of the ‘bibis’.”¹⁷ Repercussions of such an open call for mass sexual violence are visible in the Gujarat pogrom. Muslim women were openly raped, pregnant women’s wombs were destroyed and children were killed, and mass humiliated. Muslim women's bodies are hunted as prized possession.

The sexual fetishisation of Muslim women's bodies by followers of Hindutva nationalism and the Indian Hindu population, in general, is further endorsed by similar, if not worse, the portrayal of Muslim women in mass media.

Muslim Women’s Portrayals In Mass Media And Perceived Threats

The portrayal of Muslim women in Bollywood is another major anti-Muslim trope of the discourse. Despite being pictured as vulnerable, the female Muslim body is represented in the sensual world as the subject of the male gaze. Movies such as *Mughal-e-Azam* (1960), *Pakeezah* (1972), *Umrao Jaan* (1981), and *Tawaif* (1985) are some examples. These visual representations are not substantially different from Western “pulp non-fiction” books such as *The Caged Virgin*, *Sold*, *Honour Lost*, *Married by Force*, *Desert Royal*, and *Infidel*. These books have recurrent themes of force, violent abuse, coercion, and bondage that evoke the larger preconceived notions and sentiments about Muslim women.

In May 2022, a Hindu man delivered a hate-filled speech in the theatre after watching the film ‘*The Kashmir Files*’¹⁸, calling upon Hindu men to marry and impregnate Muslim women so that the demographic imbalances of India are "corrected." He shouted, “they are growing their population while you are watching a film. If all [Hindu] young men must marry their [Muslim] girls and give birth to [Hindu] children, marry their girls, in three generations, their [Muslim] population will be halved.”¹⁹ In the wake

chive/2002/marapril/pamphlet.htm

17 Editors. (2002). Pamphlet Poison. Sabrang. <https://www.sabrang.com/cc/archive/2002/marapril/pamphlet.htm>

18 (The Kashmir Files: Calls for Muslim genocide ring out in cinema halls, hate brews outside, 2022). *The Kashmir Files* is a 170-minute Bollywood movie, directed by Vivek Agnihotri released on May 11th, this year.

19 Sabrangindia (2022, March 17) *The Kashmir Files: Calls for Muslim genocide ring out in cinema halls, hate brews outside*. Retrieved July 17, 2022 from: <https://sabrangindia.in/article/kashmir-files-calls-muslim-genocide-ring-out-cinema-halls-hate-brews-outside>

of the movie's release, Hindutva has driven hate speeches that have spread in social media claiming the film had "revealed the truth to them." People outside Cinema Hall were heard chanting Anti-Muslim slogans and inciting people around for the slaughter of Muslims and a boycott of Muslim businesses.

The BJP-led central government and several state governments endorsed the movie. Speaking of the film, Prime Minister Narendra Modi defended and praised the movie, "People have been discussing it for the past few days. The people who usually spend their lives advocating for freedom of expression have suddenly got very agitated. They are not discussing the film as a piece of art. Instead, this whole ecosystem is trying very hard to discredit the film."²⁰

Anti-CAA Movement And Violence Against Muslim Women

In a string of anti-Muslim policies by the NDA government, the Citizenship Amendment Act (CAA) was passed by the parliament of India on 11th December 2019, where for the first time in India, religion became a basis for granting citizenship. Muslim women and young female students led a most sustained civil-society mobilization in utter defiance of the brutal state, police, and Hindutva violence (Kdiwal, 2021). Muslim women, spearheaded the mass movement against the discriminatory citizenship law, from Muslim female students of Jamia Millia Islamia preventing police assault on a fellow student to old and wise women braving cold Delhi winter, Muslim women refused to be silent and resisted with all their might peacefully.

'Dismantling e of Minority Education,' a report submitted by Citizen Against Hate (CAH), explores the nature and extent of police violence against Jamia Milia Islamia and Aligarh Muslim University students during the Anti-CAA protests which erupted nationwide after the Citizenship Amendment Act. The report by CAH describes the brutal violence by the men in uniform in JMI, "Delhi Police and the RAF officials entered the University without permission of the administration. On 15th December 2019, women students were dragged and beaten by male police officials. On 10th February 2020, women students were attacked based on their religious identity and pulled off their hijabs. Several women students were

20 India Today (2022, March 15) PM Modi on The Kashmir Files: Entire ecosystem out to discredit a film which tells the truth. Retrieved from <https://www.indiatoday.in/india/story/pm-modi-kashmir-files-entire-system-discredit-film-truth-1925602-2022-03-15>

sexually assaulted. They have been beaten over their genitals and suffered vaginal injuries.¹²¹ Most of them were even denied medical treatment.

At Aligarh Muslim University, on the March from Library Canteen to Bab-e-Syed on 15th December 2019, the police and RAF officials entered the campus and fired tear gas shells, rubber bullets, and stun grenades indiscriminately at protesting students, causing severe injuries. After a brutal unleashing of violence on 15th December, at Aligarh Muslim University, a Muslim woman student who participated in protests was threatened by a faculty that she would have to face several backlogs in her studies. She added, “I have a psychological fear of stepping out of the house due to my worries of being arrested”.

Anti-Muslim agendas are not only carried out by right-wing nationalists but also by the neoliberals and feminists in the name of ‘women’s rights’ (Farris, 2017). The Communist Party of India Marxist (CPIM) report on the Delhi pogrom reads, “A crucial aspect of the protest was that women leading the protest did not allow their stage to be used for Muslim Fundamentalists propaganda; on the contrary, anyone trying to do so was not allowed to speak.”²² The over-glorification of Shaheen Bagh derails the issue of institutional exclusion of Muslims and, at the same time, criminalizes Muslim identity to showcase the empowerment and liberation of Muslim women. Liberals along with Hindu nationalists cultivate discourses on Muslim women in need of liberation and the apparent criminalization of Muslim men.

Indian Muslim women have always been unabated victims of anti-Muslim violence. A number of BJP ministers have used Islamophobic comments and misogynistic slurs referring to Muslim women leading Anti-CAA protests. At a rally, the chief minister of Uttar Pradesh, Yogi Adityanath, said, “Men are sleeping under quilts; women, kids are pushed forward to protest against CAA ” (Khan, 2020). Prime Minister Narendra Modi even declared that protestors could be recognized by their clothes, “hinting at veiled Muslim women at Shaheen Bagh” (Kadiwal, 2021).

The incitement of violence by members of the BJP unleashed pogrom in Northeast Delhi in February 2020. Fact-Finding Report on North East Del-

21 Citizens Against Hate. (2022). The Dismantling of Minority Education. Citizens Against Hate. Retrieved from <http://citizensagainsthate.org/>

22 CPIM Publication. (2020). Communal Violence in North East Delhi, February 2020 A Report.

hi riots released by Delhi Minority Commission reports that within hours of Kapil Mishra's speech on 23 February, 2020, violence broke out in various parts of North East Delhi. The pogrom has witnessed the revenge on Muslim women's bodies, the deliberate inaction by police officials, and the attack on 'any makers of muslimness' (DMC Fact Finding Report on Delhi Riots 2020: Delhi Minorities Commission (Govt of NCT of Delhi), 2020). The report reads 'the rioters were yelling at the women and, saying, "Bahut see sakeenaayein aaj pakdi jaayengi." (A lot of Sakeenas [Muslim women] would be caught today).' Many reported how several women were attacked by the police and refused to provide any assistance or support when the mob attacked the protesters. A Muslim woman in the report states that as they stepped out in the violence-hit areas to protect the men in their families, they were physically assaulted and sexually harassed by the mob. The testimonies in the report state that the mob used the word 'Azadi' (freedom) as a metaphor for sexual assault and that "if they wanted "Azadi" then they were ready to give them Azadi." Also, a woman recounts that "it was then that the Police pulled their pants down and pointed their genitals towards the women stating that they wanted "freedom" and they were there to give them "freedom" and that this was their "freedom."²³

Open Calls For Rape Threats

Open calls for rape threats and pogrom in Mahapanchayat (large-scale public congregation) and Dharma Sansad (Hindu religious congregation) have tremendously increased in the last few years. One of the features of these rallies has been police standing by and watching and allowing hate-filled gatherings, while Hindu men openly called for rape threats and Gharwapasi²⁴.

For the last few years, Hindu outfits have come together for Dharma Sansad and Mahapanchayat that has witnessed an outpouring of hate speech, mobilisations to violence, open calls for genocides and rape threat. One of the Mahapanchayath organised at Ramlila ground, Pataudi on 4th July, 2021, 19-year-old Sharma alias Ram Bhakth Gopal, in response to Love jihad, called for the abduction of Muslim women and urged Hindu men

23 Delhi Minorities Commission, Report of the Fact-Finding Committee on the North-East Delhi Riots of February 2020,

24 In the Indian context, this word is used by Hindu nationalists to suggest that all those who reside in India are Hindu, and those who belong to other faiths- the Hindu nationalist movement wants them to convert back to their original faith, Hinduism.

to protect their sisters and daughters. "Do you not have big cars? If they can take our sisters, can you not pick up their sisters? You don't even have to change your name. Save them from halal and hijab. Bring them to the Sanatan dharma with respect" (Nnady, 2021) he had purportedly said.

The accused, Ram Bhakt is the same person who had been accused of shooting at an anti-CAA (Citizen Amendment Act) protester outside Jamia Millia Islamia on 30th January, 2020, and was granted bail shortly.

During a Darma Sansad at Raipur, Chhattisgarh which was held on 25th and 26th December, 2021, Sadhvi Vibhanand Giri incited Hindu men to abduct Muslim women. In a video shared by Alishan Jafri, a journalist with The Wire, Sadhvi Vibandh is heard exhorting Hindu men to capture Muslim women to be used as sexual enslaved people in response to love jihad, "if you even raise your eyes to look at Hindu girls, then from today your women (Muslim women) will be used for producing babies from Hindus with no marriage contract or without any wedding rituals." The National Commission for Women (NCW) has taken cognizance and 'notified' Sadhvi Vibhanand Giri, seeking her explanation within 48 hrs for her remarks against Muslim women.

On 3rd January, 2022, a video was shared on social media, where Hindu leader Yati Narasinghanad sitting on the banks of the Ganges in Haridwar, spewing objectionable and Islamophobic remarks against Muslim women. 'Their (Muslim) women who sleep with anyone for the service of Islam, they (Muslim women) are the greatest strength' 'For their lobbying, they send their women and make them sleep with politicians, journalists, and others for influencing and controlling everything,...his is why I advise the young priests in the Hindu fold. If an ordinary Hindu marries once, a Hindu religious priest should marry at least twice. They should then give birth to as many children as possible so that the Vishudha DNA (Most pure DNA) can spread far and wide.'²⁵ - he commented in an interview.

Another video went viral on social media of Bajrang Muni Das, a Mahant²⁶ of Khairabad, on 2nd April 2022, on Ram Navami²⁷ in front of a Masjid in

25 Haidry, Hussain. [hussain haidry]. (2022, January 3). Yati Narsinghanand is saying: 1. Islam uses Muslim women as weapons, that sleep around and lie down anywhere 2. Sant-Sadhu[Tweet; video]. Twitter. https://twitter.com/hussainhaidry/status/1477955589661622272?s=20&t=1WXhD2M-fB4tEF0McYk_bg

26 Mahant is a chief or head of a temple.

27 Hindu Festival that celebrates birth of Ram

Sitapur, Uttar Pradesh; has openly called for rape threats against Muslim women in the presence of police officers. Addressing the people who were part of a procession on the occasion of Ram Navami on loudspeaker. He spewed, ‘If you tease a single Hindu girl, then I’ll openly pick your women from houses and rape them.’²⁸

‘United Nations strategy and plan of action on hate speech’ note incitement as “a very dangerous form of speech because it explicitly and deliberately aims at triggering discrimination, hostility and violence, which may also lead to or include terrorism and atrocity crime” (United Nations Strategy and Plan of Action on Hate Speech

The impunity

Despite outrage from civil society and Muslim activists, in most of the cases, the perpetrators of the violence face no consequence at all. Multiple victims of the Bulli Bai app have narrated the ordeal of humiliation and disgust they received from police after they tried filing complaints. In some instances, although complaints are registered, the accused secures easy bail and walks free. On 11th July a complaint was registered against Ram Bakht Gopal and he was booked under Sections 153A (promoting enmity on grounds of religion, race, place of birth, residence) and 295A (deliberate and malicious acts, intended to outrage religious feelings) of the IPC. The complaint against him states, “On 04.07.2021, a Mahapanchayat was organised at the Ramlila Ground, Pataudi, where a man gave quite a provocative speech which could have caused riots and ruined the law-and-order situation, and this speech was inciting religious sentiments.” (Dayal, 2021). Soon, the next day he was arrested and sent to judicial custody. However, the Haryana court granted bail on 2nd August by restraining Gopal from organising, attending or addressing any public gathering, which is likely to promote disharmony or feeling of enmity, hatred or ill-will between religious/racial groups/communities.

Similarly, Uttar Pradesh police had registered an FIR against Mahant Bajrang Muni on 8th April after his video urging for abduction and rape of Muslim women went viral on 7th April. Muni was arrested later on 13th

28 Times Now National Desk. (2022, April 8). Facing death threats from Muslims, says Mahant Bajrang Muni Das who delivered hate speech, issued ‘rape threat’. <https://www.timesnownews.com/india/facing-death-threats-from-muslims-says-mahant-bajrang-muni-das-who-delivered-hate-speech-issued-rape-threat-article-90722800>

April and granted bail by the District Court judge, Sitapur, within ten days of his arrest. Right after his release, he told the media, “If I have to go to jail a thousand times, I will. I feel no guilt or regret about what I did. Everything I said was to protect my religion and our Hindu women.”²⁹

Yati Narasinghanad Saraswati, the chief priest of Dasna Devi temple, who has a history of hate speeches has walked free on highly derogatory and offensive remarks on Muslim women on social media. Following the complaint of Ruchika an FIR was registered against him under the sections 295A (deliberate and malicious acts, intended to outrage religious feelings of any class by insulting its religion or religious beliefs) and 509 (word, gesture or act intended to insult the modesty of a woman) of the IPC by the Haridwar Kotwali police station (Mishra, 2020). He was granted bail within 30 days of his arrest.

If we analyze the response of the state officials, media, and judicial systems in place for framing Islamophobic hate violence, it suggests that these institutions more often than not end up conveying sympathetic and humanizing portrayals of assailants committing such violence. The masterminds and creators of the Sulli deal app, Omkareshwar Thakur (25), and the creators of the Bulli Bai app, 21-year-old- Niraj Bishnoi, 18-year-old Shweta Singh, 21-year-old Mayank Rawal, and 21-year-old Vishal Kumar Jha, were arrested after outrage in social media. As a rule, they were later granted bail on ‘humanitarian grounds’ (Creators of ‘Bulli Bai’ and ‘Sulli Deals’ apps get bail on humanitarian grounds, 2022). On 29th March, while granting bail to Omkareshwar Thakur and Niraj Bishnoi, the court cited that continued incarceration would be detrimental to ‘their overall well-being’³⁰. By citing ‘immature’ and ‘tender age’ (Uchil, 2022) the court granted bail to the other three on 21st April.

Online harassment of Muslim women

‘Bulli bai’ and its previous version ‘sulli deals’ are two similar applications on the GitHub platform, which auctioned dozens of vocal Muslim women to threaten and humiliate them. On 4th July, Sulli Deals, a web-

29 Kumar, V. (2022, April 26). In Bajrang Muni’s pronouncements, anti-Muslim hatred is rife. Two Circles.net. <https://twocircles.net/2022apr26/445709.html>

30 LiveLaw.in [@LiveLawIndia]. (2022, March 28). #JustIn Delhi Court grants bail to Aumkareshwar Thakur, accused of creating the #SulliDeals app on #Github. “Accused is a first[Tweet]. Twitter. https://twitter.com/LiveLawIndia/status/1508508782074073089?s=20&t=4Zf86llp8kvpH1Y__yiWQ

based app, used publicly available pictures of several Muslim women activists, scholars, journalists, and other professionals without their consent; and created profiles, describing them as the ‘deal’ of the day. ‘Sulli’ is a derogatory term used for Muslim women in the Indian context. (Dharmadhikari, 2020). The GitHub platform had taken down the app after it evoked mass outrage on social media. Alarming, it was later discovered that the Sulli Deals app was live way before, and reports say it was created 20 days back.

The UN Special Rapporteur on Minority Issues, Dr. Fernand de Varennes responded to the issue of Sulli deals as hate speech. Varennes added that such harassment “must be condemned and prosecuted as soon as they occur. All Human Rights of minorities need to be fully & equally protected” (Singh, 2022).

Victims of the two apps have asserted that the sheer impunity enjoyed by people behind the creation of Sulli deals had given a gateway to creating Bulli bhai, which displayed 100s prominent vocal Muslim women for ‘sale as a maid.’ Bulli, like Sulli, is an Islamophobic slur referring to Muslim women. Many Muslim women opened their social media accounts on the new year with a tagline that reads "Your Bulli bai of the day is" and is put across photos of Muslim women. Ladeeda Farzana, who was put up for virtual auction the second time on the same GitHub platform, held police responsible for their inaction in the repeated targeted attack³¹. She had filed a complaint in Kerala following the Sulli deals, but the Kerala Police dismissed it.

Following the Bulli bai incident, Farzana registered a new complaint with the Commissioner of Kozhikode with the hope of getting justice. Unsurprisingly, the investigation closed, citing a lack of evidence. Afreen Fatima, a student leader subjected to Bulli Bai and sulli deals online auction, expressed her anger in Twitter by raging the impunity enjoyed by the Hindu perpetrators:

“These men see us as sexual objects that can be attacked/violated to show Muslims their place. They are not fringe. They share metro and bus rides

31 Farzana, Ladeeda. [ladeedafarzana].[Twitter; Post] (2022, January 2). https://twitter.com/ladeedafarzana/status/1477559748383805440?s=20&t=RPQGdKqVqFYP-DEjj445_kQ

with us. They probably live next to our houses. These radicalised men know no limit. And it's simply because they know nothing will ever happen to them. They will face no consequences".³²

Events of auctioning Muslim women to perpetuate a culture of fear through humiliation are not the first, and this won't be the last either. It's not in a blue moon auctioning of Muslim women takes place.

On 13th May, 2021, a video on Eid day was live-streamed on a YouTube channel called "Liberal Doge," which has more than 87,000 subscribers. The channel hosted an "auction" of Muslim women from India and Pakistan which was live streamed by the owner of the channel, later identified as 23-year-old Rathesh Jha (Goyal, 2020). The comment section was opened to "rate" the Muslim women displayed in the video and "auction" them to each other by posting sexually charged comments on their looks and clothes. The central character in his Islamophobic videos is a caricature of a dog wearing a skullcap called Maulana. Other than YouTube and Twitter, multiple posts slandering and vilifying Muslims have carried out through his Telegram channel, including a video of a girl being sexually harassed, with a text that her "Muslim father" raped her. Rathesh Jha has not been arrested yet even once, despite several complaints by victims for the multiple offences committed by him.

Social media like Chat Rooms on Clubhouse have become a breeding ground for hate, sexist comments, and lewd remarks. Especially when it comes to hosting chatroom discussions to spew loathing for Muslims and spill out Islamophobic and sexist comments, they enjoy all kinds of impunity. According to the video recording on the chatroom, the discussion centered around the Islamophobic sexualization of Muslim women and 'gharvapasi' with apparent impunity.

The video recording of the chatroom widely shared on Twitter showed 18-20 people inciting Hindu men to rape Muslim women, "Hitting on a Muslim girl's vagina is equal to the destruction of 7 Babri masjids", Another participant then "corrects" him — "Not seven mandirs, but as much as

32 Fatima, Afreen. [AfreenFatima136]. (2022, January 1). These men see us as sexual objects that can be attacked/violated to show Muslims their place. They are not[Tweet]. Twitter. <https://twitter.com/AfreenFatima136/status/1477273261373231104?s=20&t=57002wky4JflB4lIz-wkRg>

earned by demolishing Babri Masjid”. When one of the female users said ‘70% of Muslims are converts’ another man interrupted and added that “If Hindu men establish a sexual relationship with a Muslim woman (lewdly referring to female private parts), our bad deeds are washed away. Have you guys heard this before?”. They were spitting malicious conversation about Muslim women's fertility, one of the users says ‘when people like me, RSS bhakts marry Mullis (a derogatory term used for Muslim women), then they will ultimately be Hindus,”

Social media platforms like clubhouse hosts hours long steering Islamophobic conversations with a huge number of people, which fairly go unchecked. Last year, on 12th June a discussion titled ‘The civil conversation on Hindutva and Hindu Rashtra’ (Nandy A., 2021) with 800 people turned up in the clubhouse. Nupur J Sharma, editor-in-chief of Op India added her remark to the conversation.

“There is no other religion apart from Islam which contains elements and doctrines to subjugate and torture people who don’t submit to their religion, essentially saying there is no truth apart from their religion, there is just one God that is Allah. And according to them, since there is no other truth in any religion that exists, what you need to do is convert them by resort, convert them by rape, convert them by subjugation and torture. Hinduism is not a monotheistic religion like Islam and Christianity,”

It was only after a lot of effort put in by the victims themselves and a barrage of reactions evoked on social media the police were ready to file an FIR. Even then, people were more interested in sympathising with an 18-year-old accused, Shweta Singh, who lost a parent to covid but was never willing to encounter the perpetrators and the breeding grounds of radicalism in India (Singh D.) India Today, one of the mainstream media in India came out with an ‘empathy report’ for the accused Shweta Singh.

This very attempt at the sexualization of Muslim women's bodies happens on the grounds of anti-Muslim hatred, sexism, and misogyny. But such cyber hate crimes are never taken into grave account by the public or the state. Through repercussive political statements by the state and the mainstream media's evil and exotic dramatization of Muslim women, fascist state institutions have fostered bigotries.

On 26th May, Citizens for Justice and Peace (CJP) approached Twitter

over sexually violent content against Muslim women³³. After their complaint, they reported that they removed 21 Twitter accounts glorifying sexual violence against Muslim women. The removed accounts on Twitter shared hundreds of pornographic videos of women in hijab every day, with inflammatory captions and widely shared photoshopped pictures of Hindu men and pregnant women in saffron hijab³⁴. There are certain preventive acts under the Information Technology Act, 2000 where the government can act.

Under the Information Technology Act, 2000³⁵ the central government has some powers to call upon information from intermediaries that host such malicious content. Under section 69 of the act, the State government or central government has the ‘Power to issue directions for interception or monitoring or decryption of any information through any computer resource,’ Furthermore, section 69B gives ‘Power to authorise monitoring and collecting traffic data or information through any computer resource for cyber security Act.’ The IT Act also establishes the Indian Computer Emergency Response Team (CERT-IN) as a national agency for incident response. Not only are the hatemongers gone unpunished, but Muslim men are being chased on inappropriate claims for the same. Javed E P, a Muslim man from Northern Kerala’s Kannur, was booked for ‘instigating riot.’³⁶ The crime he committed was that of sharing a Facebook post criticising the obliviousness towards a press conference held by Kerala Muslim activists subjected to the “Bulli Bai” online auction. The FIR registered at Sreekandapuram Police Station under section 153 of the IPOC, 1860- provocation with an intent to riot- said, “The accused has shared this post with a malicious intention to create riot and law and order issue in the locality.”³⁷

33 CJP Team. (2021, May 28). CJP approaches Twitter over sexually violent content against Muslim women | CJP. Citizens for Justice and Peace. <https://cjp.org.in/cjp-approaches-twitter-over-sexually-violent-content-against-muslim-women/>

34 Sabrang India. (2021, July 12).CJP Impact: Twitter suspends accounts posting sexually violent content against Muslim women. <https://cjp.org.in/cjp-approaches-twitter-over-sexually-violent-content-against-muslim-women/>

35 ‘The Information Technology Act’, 2020, India Knooon, <https://indianknooon.org/doc/1965344/>

36 P, Jaseem, (2022, April 14). Kerala Police’s Social Media Surveillance Reveals A Double Standard As Hindu Extremists Go Unpunished. Article. <https://article-14.com/post/kerala-police-s-social-media-surveillance-reveals-a-double-standard-as-hindu-extremists-go-unpunished--62549f64c42d2>

37 Ibid

Delhi Commission for Women (DWC) Chairperson Swati Maliwal issued a notice to the Delhi Police, asking them to take action against the perpetrators. The main accused, a young 18-year-old, Rahul Kapoor from Uttar Pradesh, who created a group on the Clubhouse app with the user-ID 'Bismillah' was arrested on 22nd January. A day before his arrest, three other accused, Vaishnav Kakkar (21) and Yash Parashar (22) Akash Suyal (19), were nabbed by the police (Nandy A. , 2021) . Unsurprisingly, all the perpetrators spilling out Islamophobic slurs and sexist comments in clubhouse chatrooms are aged between 18 and 22 years of age.

However, On 1st February, one of the main accused, Parashar was granted bail and following this, another accused Akash Suyal, was granted bail by the court on 31st March by directing them to undergo counselling. (Saigal,2022) It is also important to note here, that Dr. Rashmi Karandikar, the IPS officer from Mumbai, who headed the investigation in Sulli deals, Bulli Bai, and Clubhouse hate chat, was transferred. Without any delay, other accused will also be ordained as 'young men who have bright futures' (Naidu, 2022)

The Restriction On Hijab

The restriction on wearing hijab for students in pre- university campuses of the Indian State of Karnataka, which the Karnataka high court later legalized³⁸, is viewed by many as another step toward criminalising the presence of Muslims, and more particularly, Muslim women in India.

The restriction on wearing hijab is an attack on overt symbols of Islam. Hijab being an evident marker of Muslim women's identity, distinguishing her from other individuals in public spaces, is an assertion of her faith and is an important part of her identity. In India, in the last few years, there is a pattern of systematic exclusion of Muslim subjects. There exists an increasing demand for neutralizing Muslim identity. Eliminating Muslim symbols of hijab, masjids, or the language of Urdu in North India is a way of eradicating any symbol of "Muslimness" from the public. Forcefully determining Muslim women's attire, the state is limiting and governing

38 The Hindu (2022, October 13) Hijab ban to continue in Karnataka schools and PU colleges: Minister. Retrieved on November 2, 2022 from: <https://www.thehindu.com/news/national/karnataka/hijab-ban-to-continue-in-karnataka-schools-and-pu-colleges-minister/article66005465.ece#:~:text=Following%20a%20split%20verdict%20in,Karnataka%20High%20Court%20order%20that>

the extent of Muslim women's public life.

The narrative of “saving Muslim women” from their patriarchal community was a dominant trope of the post-9/11 ‘War on terror’ narrative. Persistent attempts to ban hijab from the public were visible in French and broader western politics. The veil, as Saba Mahmood argues, more than any other Islamic practice, has become the symbol and evidence of the supposed violence Islam has inflicted upon women. The Hijab, being an explicit marker of identity is often targeted and deliberately misinterpreted as an object of oppression in Islam. The gendered narratives of islamophobia tend to centralise upon the hijab and Muslim women’s attire. Thus, the recent restriction on the Hijab in India’s state of Karnataka can be read as another dialect of the ‘Melanesian Discourse’ (Mahmood, 2012)

In Karnataka, the veil was seen as a measuring scale for estimating the freedom delivered for Muslim women, failing to confront the cultural subjectivity of its largest minority. The Karnataka court’s verdict declares how the practice of the veil is restricting for the practitioners; thus, the court forcefully inhibits their right to religious freedom. Courts in India have evolved a doctrine of ‘Essential Religious Practices’, where the right to Freedom of Religion extends to only those practices that are deemed essential to religion³⁹. Tracing the global trend of islamophobia suggests how Karnataka's Hijab Ban opens up further possibilities of institutionalized Islamophobia following the footprints of colonial and imperial legacies of the western world.

Unlike non-Muslim celebrities and social icons, Muslim public figures are continuously confronting questions over their attire⁴⁰, religious position, and nationalist feelings. Therefore, taking the pretext itself asserts how the recent restriction on wearing hijab in Karnataka’s educational institutions is problematic on various socio-political grounds in the country. It denies Muslim women the Right to Freedom of Religion and the right to education, at the same time. The restriction on the hijab forces Muslim women to choose between their faith and access to education. Leaves behind Mus-

39 Quill Foundation, (2022). Taking a Closer Look at the Hijab Verdict.

40 The New Indian Express (2022, June 14) Hindu-Muslim doesn't matter, I'm not representing a community, but my country: Nikhat Zareen. Retrieved November 2, 2022 from: <https://www.newindianexpress.com/sport/other/2022/jun/14/hindu-muslim-doesnt-matter-im-not-representing-a-community-but-my-country-nikhat-zareen-2465460.html>

lim women the choice between their religion and public life.

The hijab ban refuses the Fundamental Right of Right to Freedom. Article 21 promises the Right to life and individual freedom, Article 21(A) supplies the right to basic education, and Article 19 guarantees freedom of work. All of these are denied in the case of Muslim women, once the hijab is banned.

The economically backward groups of the community subsequently get further marginalized, as their access to social upliftment through education is denied. According to the Sachar Committee Report⁴¹, as per the 2001 Census, 7% of the population aged 20 years and above are graduates or hold diplomas, while only 4% of the Muslim population does. The Committee Report notes that the gap between Muslims and other Socio-Religious Categories (SRCs) increases as the level of education increases and that unemployment rates among Muslim graduates are the highest among SRCs both among the poor and the non-poor”. As Christophe Jafferlot remarks, “31% Muslim youths who are between the age group of 15 and 24 neither have access to education nor in jobs.” That is more than any other group and almost one-third of Muslim youths are jobless and without any access to higher education. 59.1 % of Muslim men are literate according to the 2001 census against 65.1% of Hindus. n/ bUp to the primary level, Muslims send their kids to school more than any other community 65.31% against 54.91% for Hindus. However, “Dropout rates at Secondary and Senior Secondary level, gradually but in-exorbitantly, make the Muslims the last” he noted. Only 4.53% of Muslim Boys & Girls are in senior secondary schools. At the graduation level, the situation is disastrous. Muslims represent only 3.6% of total graduating students. Thus, the hijab ban is an economical challenge for the community, which has long been weak in its access to education.

According to Sachar Committee Report⁴², the proportion of Muslim wom-

41 PRS Legislative Research (2206, December 7) Summary of Sachar Committee Report. https://prsindia.org/files/policy/policy_committee_reports/1242304423--Summary%20of%20Sachar%20Committee%20Report.pdf

42 Ministry of Minority Affairs, The Government of India (2015, June 23) Complete Sachar Committee Report(English), 2006. <https://www.minorityaffairs.gov.in/en/document/sachar-committee-report/complete-sachar-committee-reportenglish-2006-6655-kb>

en in the workspace is the lowest. Among Muslims, the work participation rate, another key determinant of socio-economic well-being, representing the workforce per 1,000 population, was the lowest of all the major religions—536, below Sikhs (568), Christians (540), Hindus (563), and Others (573), also according to 2010 report. As per the Report, “the most striking feature is the relatively high share of Muslim workers engaged in self-employment activity,” primarily in urban areas and for women workers. Participation of Muslim salaried workers in both the public and private sectors is quite low (as is true for SCs/STs), and the average salary of Muslim workers is lower than others (possibly, as more Muslims are in inferior jobs). Participation of Muslim workers in the informal sector is much higher than the average population, and the percentage of Muslim women working within their homes (70%) is much higher than all workers (51%). Institutionalised and non-institutionalised violence against hijab-wearing Muslim women is one of its direct reasons.

The Karnataka government's new policy to ban hijab in schools would lead to a further decline in the rate of Muslim women in the workspace. The government here is neglecting its responsibility to uplift minority communities in the education and work sectors socially. Instead, it is demotivating and discouraging women, particularly Muslim women, from availing of workspaces.

Muslim women have been at the receiving end of gatekeeping and discrimination in the workforce concluded a study carried out by LedBy Foundation ⁴³. This report highlights a deep seated prejudice that muslim women face in almost all public spaces, university, office, and otherwise. The ban on Hijab in one college or many colleges, in one state or many states, entails an anxiety of muslim women's participation and presence in public sphere every college, in every state.. It not only limits their movement but makes them targets of institutional discrimination and even physical attacks. The institutional segregation, isolation, and threat to muslim women's freedom to practice their faith pushes them out and requires them to assimilate into someone else to be accepted. Many Muslim women share similar stories of humiliation and harassment by faculty

43 The Swaddle (2022, June 27) Many Muslim Women in India Face Discrimination During Hiring Process, Shows New Research. <https://theswaddle.com/many-muslim-women-in-india-face-discrimination-while-hiring-shows-new-research/>

members, colleagues, and staff in university spaces, snide comments to abuse to discriminatory pattern of marks in written and viva exams. Muslim women have to assert an extra push back in such spaces so as to not fall back. The mental trauma that is inflicted on the minds is another way of pushing Muslim women out. The institutional murder of Fathima Lathief in IIT Madras, is a grim example of this discrimination.⁴⁴

Despite being India's largest minority (14% of the Indian population), Muslims have the lowest rate of enrolment in higher education in India (4.4% enrolment in higher education, according to the 2014 -15 All India Survey on Higher Education). In proportion to their population, Muslims are worse off than scheduled castes and scheduled tribes. Despite almost trebling in the decade ending 2010 – from 5.2% to 13.8% – the rate of Muslim enrolment in higher education trailed the national figure of 23.6% and that of other backward classes (22.1%) and scheduled castes (18.5%). Scheduled tribes lagged Muslims by 0.5%. In higher education, Muslims (13.8%) trailed all the major religions in gross enrolment rate in 2010 – Hindus (24.2%), Christians (36.9%), and others (Jains, Sikhs, etc) (28%). Muslims have the highest dropout rate. The dropout rate among Muslims is 17.6%, higher than the all-India average of 13.2%, according to this 2014 study based on 2005-06 National Family Health Survey data. The government instead of promoting education among backward communities is creating barriers to the community's access to education. The legalization of the hijab ban would further increase the rate of dropouts from educational institutions.

The adoption of educational institutions playing background for the first attempt at institutionalized islamophobia in India isn't an innocent choice. The savarna idea of exclusive educational access for Vedic Aryans is deeply embedded in India's psyche. The challenge against minority reservation in educational institutions has long persisted within the mainstream Hindu consciousness. Thus Dalits, lower caste Hindus, and Muslims have been prone to discrimination in educational spheres.

Hijab-Based Discrimination And Its Impact

44 The Times of India (2019, November 14) Family points to message, accuses professor of Islamophobia over IIT-Madras student suicide. <https://timesofindia.india-times.com/city/chennai/family-points-to-message-accuses-professor-of-islamophobia-over-iit-madras-student-suicide/articleshow/72048323.cms>

Discrimination with Muslim women's attire isn't exclusive to Karnataka, and the order passed by the High Court has only made the situation grim as it has led to slowly institutionalising the ban on hijab. Discrimination based on hijab has become a day-to-day reality in India under the BJP government. In Bihar's UCO Bank's Mansoor Chak branch in Begusarai, a Muslim woman was denied cash withdrawal by the bank cashier for not removing her hijab to withdraw money⁴⁵.

A 24-year-old lawyer, Tuba Sanober from Nagpur, Maharashtra, says, "I am a lawyer, I wear a hijab all the time but not on court premises because I fear being discriminated against...but I am always scared to cover my head in the courtrooms." Without the hijab, it's hard to tell if she's a Muslim, and disguising her religious identity makes her feel safe. "My name does not sound Muslim in the first instance, nor do I look like one without a hijab, and maybe I take that as an escape from my real Muslim identity in courts," Sanober said⁴⁶. The consequences of Karnataka's Hijab Ban are multifold. By banning the overt symbols of religion and denying a minority community's obligatory practice, the state is challenging the community at various levels.

The segregation of Muslim women from educational institutions limits their social life. The already marginalised state of the Muslim community of India would step into a more vulnerable condition with this. The social impacts of the hijab ban are thus unavoidable. The psychological effects of the restriction on hijab and the need for resistance are tiring and demanding at numerous levels. These girls have faced a media trial, losing their friends at this crucial age, and a lack of support from their educational institutions. They are traumatized and are emotionally overwhelmed by the number of challenges they are facing.

While talking to the psychologists and counselors, Muslim women complain that for some of them, discrimination began as early as school. The 'othering' they faced from their teachers and fellow students is dishearten-

45 The Indian Express. (2022, February 22). Bihar: PSU bank denies cash to woman in hijab first, allows after intervention. <https://indianexpress.com/article/cities/patna/bihar-woman-asked-to-remove-hijab-at-bank-7784311/>

46 Youth Ki Awaaz. (2022, April 23). Perturbed By The Hijab Ban, Here's What Muslim Women Have To Say. <https://www.youthkiawaaz.com/2022/04/urban-hijabi-women-perturbed-over-hijab-ban-rising-islamophobia/>

ing and traumatic. Humaira Khan, a researcher, mental health professional, and the manager of Muslim Women Study Circle (MWSC) quotes⁴⁷ her teacher's remark while attending college: "Who has made you wear it? How can you wear such a thing that is so backward? You were such a good student. I am worried." The identity of Muslim women is forced to be erased and her agency to choose is deprived by the same public that says she is backward.

Systematic marginalisation, rampant Islamophobic slanders, and targeted sexual violence disrupt Muslim women's capacity to fully exercise their self-determination and dignity. Experiences of being degraded and humiliated for wearing the hijab grows, not only in schools but also on the bus, while house-hunting or searching for a job. (Muslim Women's Study Circle⁴⁸ (MWSC).

Conclusion

Indian public space has been threatening to both Muslim women and men. The rise of Hindutva politics in the last few years has placed every aspect of life and livelihood under public scrutiny. Muslim women have been continuously at the receiving end of violence from the State and the public. Their enforced invisibility in public spaces, attack on bodies, and education has also led to a lot of self-policing and self-doubt. These acts of violence are justified with gimmicks of “women empowerment”, “security reasons” and so on. With the continuous attacks on Indian Muslims and the daily harassment faced by Indian Muslims, especially Muslim women, India remains a bleak society with little for Muslims to look up to. This chapter is not a mere collection of voices and events of violence, but rather an investigative study to document and stress on the lived realities of Muslim women in India.

47 ibid

48 Muslim Womens Study Cricle [Youtube Channel]. <https://www.youtube.com/c/MuslimWomensStudyCircle>

The Sikhs of India; Repression and Exclusion

Aditya Menon

The state of Punjab has been seen as the land of Sikhs, given that a large majority of Sikhs inhabit the state. This synonymy of Punjab and Sikhs is a recent phenomenon in the political history of the state. The Sikhs are a small minority community in India with a population of less than 02 percent. 60 percent of the total 20.8 million population of the community is concentrated in the state of Punjab, making the community a numerical majority in the state.¹

The ‘partition’ was accompanied by a transformation in regional demographics because of the mass migration of the population. There was a significant increase in the Sikh population as well. In 1950, the representatives of the Sikhs refused to sign the constitution of India because of some fundamental differences in the categorization of Sikhs. The Sikhs demanded ‘Punjab Suba’, an essentially Sikh majority region in aspirations for a political space of their own. Continued agitations faced heavy government crackdown, entry of police force into the Golden Temple in 1955, raids, arrests, and even killings. In 1966, after much resistance, the central government of India, Punjab was reorganised making Sikhs the religious majority in the state.²

However, despite a numerical majority in the state of Punjab, Sikhs have been a minority in all urban centres of the state. The Sikh community in Punjab is a predominantly rural community with only 21 percent of the population living in urban centres. The average urban population of the state was 34 percent in 2001. Historically and academically, there is ample research and inquiries concerning Sikhs, the earliest being, the translations of Sikh scriptures into English by Britishers in colonial India but these inquiries have mostly been on the community and its religious traditions.³

Every minority in India has been rendered vulnerable due to the rise in majoritarian hate in the country and the Sikh community has been no exception to this process. The Indian state crystallised a construction of the Sikhs and the community’s traditions as violent and the leaders of the

1 (n.d.). Government of India: Home. <https://censusindia.gov.in/census.website/>

2 Grewal, J. S. (1998). *The Sikhs of the Punjab* (Vol. 2). Cambridge University Press.

3 Singh, T. (1994). Ernest Trumpp and WH Mcleod—As Scholars of Sikh History. Religion and Culture, International Centre of Sikh Studies, Chandigarh.

community to be irrational and fanatical. Another construction was that the Sikhs in Punjab were waging a religious war against Hindus of the state, giving rise to the perception of a Sikh-Hindu conflict. It also created an atmosphere where political claims of Sikhs were viewed with suspicion and deemed illegitimate.⁴

The 1980s are seen as an initiation of a time of widespread misinformation and continued persecution of Sikhs. The said misinformation is known to be facilitated by news media painting a fanatical image of Sikh leaders, such as the portrayal of Sant Jarnail Singh Bhindranwale.⁵ The negative portrayal continues to this day as highlighted in the previous chapters dealing with media representation of minorities in print and television media.

The Sikh community has already faced one genocide in Independent India - in October-November 1984.⁶ According to government estimates, 3350 Sikhs were killed in different parts of India in October-November 1984 following the assassination of the then Prime Minister Indira Gandhi. Independent estimates put the number of Sikh casualties at over 15000.⁷ The Sikh community has also been a major victim of state violence, with several thousand being killed in extrajudicial killings in the 1980s and 1990s.⁸ The last few years have witnessed a revival of anti-Sikh hate, corresponding to the larger rise in majoritarian nationalism in the country. There are multiple dimensions to this process of persecution and threat faced by the Sikh community in India.

Genocide Threats

4 Varadarajan, S. (2009). Minority Images in the Indian Print Media. Muslims and media images: News versus views, 100-113.

5 Mann, R. D. (2016). Media framing and the myth of religious violence: The othering of sikhs in The Times of India. *Sikh Formations*, 12(2-3), 120-141.

6 Jennela, A. (2019, March 29). The 1984 Sikh Genocide: What It Is and Why We Need to Know About It. East Coast Asian American Student Union. <https://www.ecaasu.org/2019-3-25-the-1984-sikh-genocide-what-it-is-and-why-we-need-to-know-about-it/>

7 India TV News Desk. (2019, December 5). 1984 anti-Sikh riots could have been avoided if Gujral's advice was heeded: Manmohan Singh. India TV News. <https://www.indiatvnews.com/news/india/manmohan-singh-1984-anti-sikh-riots-narsimha-rao-in-der-kumar-gujral-568845>

8 PDAP Files PIL in Supreme Court Regarding Enforced Disappearances In Punjab - Press Release. (2019, July 7). Punjab Disappeared. <https://punjabdisappeared.org/petition-filed-in-supreme-court-press-release/>

As a minority community, the Sikh community in India has been at the receiving end of violence and systemic othering by both state and non-state actors. The trauma of 1984 is still fresh in the hearts and minds of Sikhs in India and has formed the collective psyche of the community. The violence that continued for several months was not an isolated occurrence but a result of decades of tension between the Central Government and the Punjabi Sikhs.⁹ It was a well-planned state-sanctioned attack on the Sikhs that used the death of PM Indira Gandhi as fodder to explode into an anti-Sikh genocide.¹⁰

There have been active efforts by ruling dispensations of the central Indian government to curb activism and mobilisation within the Sikh community. The otherization of Sikhs also has had negative social implications for the community that has become mainstream narratives through public speech and media representation of the community. The entire Hindu vs Sikh narrative has piggybacked on misinformation and fear-mongering against Sikhs.¹¹

The Farmer's movement against three farm laws¹² brought by the Government of India spearheaded by Punjabi Sikh farmers was attacked and demeaned in a variety of ways.¹³ One of the reoccurring examples of this was the rampant hate speech hurled against protesting farmers, especially against the Sikh farmers protesting the introduced farm laws.¹⁴

9 Kaur, G. (2013, June 3). Remembering the Massacre of Sikhs in June of 1984. Huff-Post. https://www.huffpost.com/entry/remembering-the-massacre-of-sikhs-in-june-of-1984_b_3377276

10 Kaur, L. (2022, March 1). Part 1: The Anti-Sikh Violence of 1984 | The Background. Kaur Life. <https://kaurlife.org/2022/03/01/the-anti-sikh-violence-of-1984-part-1-the-background/>

11 Virk, H. S. (2021, September 14). Genesis of Hindu-Sikh Divide: A Critical Evaluation of the Divide. SikhNet. <https://www.sikhnet.com/news/genesis-hindu-sikh-divide-critical-evaluation-divide>

12 Three farm laws refers to three legislative bills introduced in the Indian Parliament by the central government aimed at changing the way agricultural produce is marketed, sold and stored across the country. The laws were passed as bills, which were opposed by farmers as they feared the laws would encourage corporatisation of agriculture and lead to inadequate demand for their produce.

13 Narayanan, S. (2020, September 28). The Three Farm Bills. The India Forum. <https://www.theindiaforum.in/article/three-farm-bills>

14 Mishra, H. (2021, November 19). Farm Laws Repeal Demonising 'Khalistani', 'Ter-

The anti-Sikh narratives prevalent and crafted during the Farmers' movement are discussed in detail in the following section.

Hate speeches against Sikhs with threats of repeating the 1984 anti-Sikh genocide have become a common occurrence, in today's day and time in India. The Sikhs have been known to be a tolerant community aiding community service and humanitarian help but are still represented with negative undertones and overtones. The trauma of violence and damage is resurfaced again and again in the form of threats to keep the community in check and into submissions.

January 2022 witnessed a sudden rise in genocide threats targeting the Sikh community. This occurred after Sikh farmers from Punjab protested near the convoy of Prime Minister Narendra Modi during his visit to the state. As his convoy had to turn back due to the protests, the Prime Minister made a comment at the airport insinuating that he had escaped with his life.¹⁵ This was followed by an outpouring of hate and genocide threats on social media directed at the Sikh community. Some of those giving these threats happened to belong to India's ruling party - the Bharatiya Janata Party (BJP).¹⁶

For instance, a BJP legislator from Bithoor in the Uttar Pradesh state Assembly, Abhijeet Singh Sanga, tweeted, "Don't make the mistake of considering him Indira Gandhi. Shri Narendra Damodardas Modi is his name. You won't even get a paper to write on or history to read". He later deleted the tweet and said that he didn't mean all Sikhs but only "unpatriotic ones". The ruling BJP took no action against Sanga. Instead, the party nominated him again as a candidate for the elections to the Uttar Pradesh provincial assembly, held a couple of months later.

On the same day as Sanga's tweet threatening genocide, party colleague

rorist' Farmers Indian Media Save Face. The Quint. <https://www.thequint.com/voices/opinion/farm-laws-repeal-after-a-year-of-demonising-khalistani-terrorist-farmers-indian-media-is-now-trying-to-save-face#read-more>

15 India PM Narendra Modi trapped on Punjab flyover in security breach. (2022, January 6). BBC. <https://www.bbc.com/news/world-asia-india-59856628>

16 Menon, A. (2022, January 7). Aftermath of PM Modi's Punjab Visit: Sikhs Face 'Repeat of 1984' Threats on Social Media. The Quint. <https://www.thequint.com/news/politics/sikhs-1984-genocide-threats-pm-modi-punjab-visit-bjp-twitter-hate-speech>

- Avdhut Wagh, spokesperson of the BJP's Maharashtra state unit - called for the elected chief minister of Punjab, a Sikh, to be hanged till death. Sushil Kedia, another known Hindu right wing voice on social media, tweeted that "Even if a scratch would have come on Prime Minister Narendra Modi, 1984 would have been dwarfed in history."¹⁷

Several other right-wing supporters tweeted a common message, "A tree had fallen in 1984 and the earth shook. He (Modi) is Mount Everest. There will be total devastation".¹⁸ This message was tweeted out over 1200 times. This tweet is a spin-off from what the then Prime Minister Rajiv Gandhi had said after Indira Gandhi's assassination: "When a big tree falls, the earth shakes".¹⁹ Gandhi has been criticised for this statement, which many saw as justification for the 1984 anti-Sikh pogrom.

Another tweet said, "The 1984 riots took place only in Delhi. This is Modi. His popularity is known to everyone. The entire Sikh community would have been wiped off in India and abroad".²⁰ Another, even more, graphic tweet said that more Sikhs "than 1984 would have been butchered and thrown in the drains."²¹

Twitter wasn't the only platform where there was hate against Sikhs. Calls to "repeat 1984" were given on Facebook as well. A Facebook user named Ajai Singh from UP's Shikohabad posted on his wall, "84 will start appearing as a minor incident....if Modi had even a gash, neither your race nor

17 Maktoob Staff. (2022, January 9). "1984 would be dwarfed in memory," BJP genocidal calls on Sikhs. Maktoob Media. <https://maktoobmedia.com/2022/01/09/1984-would-be-dwarfed-in-memory-bjp-genocidal-calls-on-sikhs/>

18 Menon, A. (2022, January 7). Aftermath of PM Modi's Punjab Visit: Sikhs Face 'Repeat of 1984' Threats on Social Media. The Quint. <https://www.thequint.com/news/politics/sikhs-1984-genocide-threats-pm-modi-punjab-visit-bjp-twitter-hate-speech#read-more>

19 DNA Web Team. (2018, December 17). When a big tree falls, the earth shakes: How Rajiv Gandhi justified 1984 anti-Sikh riots. DNA India. <https://www.dnaindia.com/india/report-when-a-big-tree-falls-the-earth-shakes-how-rajiv-gandhi-justified-1984-anti-sikh-riots-2697259>

20 Menon, A. (2022, January 7). Aftermath of PM Modi's Punjab Visit: Sikhs Face 'Repeat of 1984' Threats on Social Media. The Quint. <https://www.thequint.com/news/politics/sikhs-1984-genocide-threats-pm-modi-punjab-visit-bjp-twitter-hate-speech#read-more>

21 *ibid.*

history would remain.”²²

Anti-Sikh Narrative During 2020-21 Farmers’ Protests

There was a massive increase in anti-Sikh hate and anti-Sikh propaganda during the protest by Indian farmers against the Narendra Modi government's controversial agricultural laws. Though the protest was carried out by farmers from across North India, Sikh farmers from the Punjab province played a leading role in the entire agitation.

There was a clear attempt by the Indian government as well as a major section of the pro-government media to project the protests by Sikhs as "anti-national" or "treason". The protesters had to face brute force from the police when they were marching peacefully from Punjab to Delhi. The most gruesome incident of violence against protesters took place in October 2021 in Lakhimpur Kheri in Uttar Pradesh, where the vehicle belonging to a minister in Prime Minister Narendra Modi's government mowed down farmers who were protesting on the road. Four Sikh farmers were among those mowed down by the vehicle, allegedly being driven by Mishra's son.

The protesters set up camp on Delhi's Northern, Western, and North-Eastern borders, braving peak summer and winter, rains, a raging pandemic, and the threat of violence from the police and right-wing vigilantes. Over 700 farmers died at the protest sites, due to illness and extreme weather. A vast majority of them were Sikhs. Despite this, the government continued to label the protesters as "anti-national" and even submitted this view in India's highest court.

There is a historical context to this. Successive governments in India have viewed any political mobilisation by Sikhs - even on issues like agriculture and language - from the point of view of national security. This is why the Punjabi Suba movement of the 1950s and farmers' agitations of the early 1980s were both met with brute force by the state. Through the 1980s and early 1990s, any form of protest was banned in Sikh-majority Punjab, citing national security. There was a complete ban even on farmers' protests, even though they were allowed to continue in other provinces in India. The same mentality of viewing Sikh political mobilisation as a na-

²² *ibid.*

tional security threat coloured the view of the Indian government towards the 2020-21 farmer's protest.

Attacks on Sikligar Sikhs

Along with Sikh farmers, another community that has been a frequent target of violence from both vigilantes and law enforcement officials are Sikligar Sikhs of central India. Sikligar Sikhs are oppressed caste converts to Sikhism and mainly reside in parts of central and western India. Originally associated with the crafting of weapons, many of them are now manufacturing locks and keys. Many Sikligars residing in Delhi were massacred during the 1984 genocide.

In the last few years, there have been a number of localised attacks on Sikligar Sikhs in central India. In June 2020, Sikligars in MP's Khargone district claimed that they had to flee their homes and were forced to live in the forest due to being hounded by the police.²³ Later that year a Sikh Granthi (preacher) belonging to the Sikligar community was publicly thrashed by the police in Madhya Pradesh's Barwani district. The police also pulled him by the hair, which amounts to insulting an article of faith for Sikhs.

In 2018, houses belonging to Sikligars and a Gurdwara were damaged by the police in Balsa near Parbhani in Maharashtra. These attacks make the community of Sikligar Sikhs even more vulnerable.

2011 was a particularly tough year for the community in Madhya Pradesh as the state police raided several Sikligar deras and homes. The cops accused members of the Sikligar community of providing weapons to the banned Student Islamic Movement of India. The son of the president of Sikligar deras was also arrested by the police. The charges weren't proven in most cases but the community's stigmatisation only increased post the said incident.

The Sikligar Sikhs are overlooked and neglected. They have been ostracised socially and pushed out of the economy due to modernization and

23 Sikh24 Editors. (2020, June 18). Sikligar Sikhs forced to live in jungle fearing arrest in fake cases by Madhya Pradesh police. Sikh24.com. <https://www.sikh24.com/2020/06/18/sikligar-sikhs-forced-to-live-in-jungle-fearing-arrest-in-fake-cases-by-madhya-pradesh-police/>

replacement of artisans with machines making them disadvantaged financially and the most destitute and famished among Sikhs.²⁴

State Repression: Arrests And Control

The coloniality and utter disregard of Human Rights in UAPA have often been contested and demands for its repeal have become utterances that don't mean a thing to the governments ruling India and who continue to use the law to achieve their agendas. Political conflicts and challenges have been curbed by anti-terror laws rendering even the most legitimate demands of minority communities an illegitimate conspiracy.

Along with Muslims, Sikhs are bearing the brunt of India's draconian anti-terror legislation - the Unlawful Activities Prevention Act with hundreds being incarcerated under it. The legislation allows the authorities to arrest and jail individuals for years without a trial. As of July 2020, there were 94 UAPA cases in the Punjab province under which 370 people had been kept in jail, most of them Sikhs.

In terms of using UAPA to jail people, the Congress government in Punjab that was in power between 2017 and 2022 was as notorious as the current BJP government in several states and at the national level.

One of the most sinister aspects of the use of UAPA against Sikhs has been the manner in which law enforcement agencies have been citing mere social media posts as the reason for charging them under the anti-terror law. Here are some such instances: In April 2018, Punjab Police arrested 4 youths allegedly planning to highlight Khalistan issues at cricket matches. The cyber cell tracked these youths from a Facebook page in the name of "Referendum 2020". The youth was allegedly instructed on the page to put Referendum 2020 posters to get media attention.

In December 2018, Harpal Singh Naik and Mohiuddin Siddiqui were arrested under the UAPA from Pune, India. The two allegedly created a pro-Khalistan Facebook group, 'Khalistani Zindabad Khalistan'. The Facebook group had about 2,315 followers. The two were accused of posting "images and videos of Operation Blue Star and pro-Khalistani posts" as

24 Dubey, P., & Tehelka. (2012, November 13). Sikligar Sikhs: Tale of a forgotten people. Sikh24.com. <https://www.sikh24.com/2012/11/13/sikligar-sikhs-tale-of-a-forgotten-people/>

well as promoting ‘Referendum 2020.’²⁵

In July 2019, Jarman Singh was convicted of terror-related charges. India received assistance from WhatsApp and Facebook servers in the U.S. to secure a conviction. Indian authorities requested access to his chats from Facebook and WhatsApp’s legal division. Jarman was part of WhatsApp groups that promoted Referendum 2020, an online campaign for Khalistan. The NIA said the accused “shared motivational songs on Jarnail Singh Bhindranwale, who was killed in Operation Blue Star in 1984.”²⁶

On 28th June, 2020, police arrested Mohinder Pal Singh, Gurtej Singh and Lovepreet Singh and charged them with terrorism related offences. Three phones were recovered with videos and photographs related to the Khalistani movement and their propagators, the police claimed. The police alleged that Lovepreet was very active on Social Media Platforms and made a Facebook Page named ‘KhalsaBhindrewalaji’.²⁷ He had allegedly shared several posts with videos, pictures, and songs supporting Khalistan leaders and the Khalistan movement. Lovepreet had also served food to Muslim protestors in Delhi during the Shaheen Bagh demonstrations.

In none of these cases was an act of violence actually committed by any of the people arrested. They have been arrested mainly for social media posts or being part of social media conversations. This is despite the fact that according to a judgement by the Supreme Court of India in 1995, merely chanting the slogan of 'Khalistan Zindabad' does not constitute an offence.²⁸

25 PTI. (2019, May 24). NIA files charge sheet in Sikh militancy case. Times of India. <https://timesofindia.indiatimes.com/india/nia-files-charge-sheet-in-sikh-militancy-case/articleshow/69485171.cms>

26 Singh, V. (2019, July 12). Evidence gathered from social media secures conviction in Khalistani case. The Hindu. <https://www.thehindu.com/news/national/evidence-gathered-from-social-media-secures-conviction-in-khalistani-case/article28414529.ece>

27 WSO Releases Report on Indian Crackdown on Sikh Social Media. (2020, July 20). World Sikh Organisation of Canada. https://www.worldsikh.org/wso_releases_report_on_indian_crackdown_on_sikh_social_media

28 Rautray, S. (2016, February 20). Supreme Court in 1995: Stray slogans do not attract Section 124A pertaining to sedition. The Economic Times. <https://economictimes.indiatimes.com/news/politics-and-nation/supreme-court-in-1995-stray-slogans-do-not-attract-section-124a-pertaining-to-sedition/articleshow/51062254.cms>

A number of Sikh websites, social media accounts, and hashtags have also been banned by the Indian authorities. Punjab-based news website Sikh Siyasat was blocked in June 2020 within India.²⁹ Sikh oriented news channels Akaal Channel, KTV and TV84 were blocked on YouTube.³⁰ While Akaal Channel is live again, the ban on the YouTube homepages of TV84 and KTV continues. Sikh Siyasat's English website also remains blocked in India.

Conclusion

The spectre of separatism among Sikhs has been exploited by political parties in the Punjab state as well as the centre to feed in an insecurity into the Hindu voter and majority. A plethora of incidents and historical betrayal has become a reason for the crystallisation of the Sikh identity, the perceived and the inherent. The media as well have played a critical role in creating an atmosphere that legitimises state and non-state violence by mirroring the agendas and prejudices and by misrepresenting the conflicts between people and the state.³¹ Be it the genocide threats, the arrests under UAPA or the banning of websites, it is clear that any form of political assertion by Sikhs is viewed with suspicion by the authorities and with downright hostility by the Hindu right-wing forces in India.³²

The hate and violence against Sikhs are sometimes difficult to document for two reasons. First, a lot of it is done by law enforcement agencies on the pretext of national security, rather than through vigilantes. Second, Sikhs outside of Punjab are very less in number and many cases of violence and harassment against them often go unreported due to their smaller numbers.

The Akal Takht, the highest temporal body of the Sikh community, has

29 Singh, P. (2020, June 24). Sikh Siyasat Banned In India, Editor Writes To Major ISPs. Countercurrents. <https://countercurrents.org/2020/06/sikh-siyasat-banned-in-india-writes-to-major-isps/>

30 khalsatv. (2022, June 27). After Sidhu Moose Wala's SYL, Several Punjab & Sikh Handles Banned on Twitter – KTV. KTV Global. <https://www.ktv.global/after-sidhu-moose-walas-syl-several-punjab-sikh-handles-banned-on-twitter/>

31 Jodhka, S. S. (2009). Sikhs in contemporary times: Religious identities and discourses of development. *Sikh Formations*, 5(1), 1-22.

32 Helweg, A. W. (1987). India's Sikhs: Problems and prospects. *Journal of Contemporary Asia*, 17(2), 140-159.

consistently been raising concerns on the rising hate against Sikhs and other minorities. The Jathedar or head of the Akal Takht, Giani Harpreet Singh, has squarely blamed the Rashtriya Swayamsevak Sangh, the ideological fountainhead of the ruling BJP, of dividing society and creating hatred. The creation of the suspicious Sikh image dates back to the inception of India, but the role of RSS and its political wing BJP in hardening this image and making persecution of Sikhs outright and normative.

On the other hand, the Akal Takht and lay Sikhs have consistently shown solidarity with the Muslim and other oppressed community in the context of hate crimes and discrimination. The community has shown strong support of other oppressed people and communities.³³ The trajectory of Sikhs of India lies between inclusion and exclusion. Their demands for self-determination and the violent cycle of repression that followed and continues to this day make the community stand at the receiving end of different forms of persecution commanding obedience and submission into the masses for security and peace.

33 Dharni, A. (2020, March 4). 11 Times Sikh Community Came To People's Rescue Regardless Of Their Religion, Caste Or Country. *Indiatimes.com*. <https://www.indiatimes.com/lifestyle/11-times-sikh-community-came-to-peoples-rescue-regardless-of-their-religion-caste-or-country-507283.html>

Universities as sites of resistance: Journey of Muslims to and in Higher Education

Sabah Maharaj

As a community, the muslim community is behind every social group in terms of presence in higher education as well as access to educational resources. There are several factors which contribute to the steadily declining presence at all levels of the education system, be it primary, secondary or postsecondary university education. The current state can be only attributed to decades of political, economic, and social marginalisation which contribute to these figures. The latest data released by the government survey All India Survey of Education (AISHE), suggests that in the years 2019-20, only about 21 lakh Muslims were enrolled in Higher Education, of which 77.36% were in colleges that are not particularly renowned.¹ In institutes of national importance, such as the Indian Institute of Technology (IIT), the National Institute of Technology (NIT), and the Indian Institutes of Science Education and Research (IISER), Muslims constitute a staggeringly low figure of 1.92%. Thus, according to Robinson (2008), being a Muslim reduces one's chances of attaining and completing an education. The data remains a testament to the dismal absence of Muslims in higher education, be it in positions of teaching, or in that of learning. The growth rate of Muslim enrolment in higher education was 120.09% from 2010-11 to 2014-15, to only 36.96% from 2014-15 to 2019-20, reflecting a steady decline. Thus, as of 2019-20 Muslims in higher education constitute only a third of what their ideal share should be.²

Despite comprising 14% of India's population, Muslims account for about 5.5% of students enrolled in higher education, according to the AISHE 2019-20. According to the 2006 Sachar Committee report, the state of Muslims in higher education has actually worsened over the last five decades.

According to NSSO data, Muslims have the lowest expenditure rate among all religious groups, which may be one of the several factors that account for their under-representation in higher education. India's top law schools have consistently seen a low rate of enrolment of Muslims, with the lowest

1 Qamar, F., & Shamra, N. (2021, October 6). More Muslim representation needed in higher education. Deccan Herald. <https://www.deccanherald.com/opinion/comment/more-muslim-representation-needed-in-higher-education-1037706.html>

2 Pathak, V. (2018, January 12). Only 4.9% of higher education teachers are Muslims. The Hindu. <https://www.thehindu.com/news/national/only-49-of-higher-education-teachers-muslims/article22431446.ece>

being 1.51% in 2017-27 and rising at a slow rate to 3.88% in 2018-19. It has been recorded that Muslims constitute only 2.5% of students who appear for law exams. Lack of access to economic resources prevents students from applying for the exams, and some even after applying, do not admit themselves to courses as the fees at law schools in India remain exorbitant and the government provides no scholarship for minority students at these law schools.³ The sum total of students enrolled in higher education includes the percentage of students who are admitted to Muslim minority educational institutes which provide reservations for Muslim students. Excluding these numbers, the total figure would be even lower. These figures clearly denote the socio-economic conditions of Muslims are beyond repair, and there has been little attempt by the government to mitigate or address these factors. The same patterns are reflected in the New Education Policy which seeks to bring monumental changes in the Indian education system and it mentions minorities only twice, and only in passing. (The Hindu, 2022) Thereby, with such conditions, the ongoing genocidal violence clearly puts Muslims in an even more vulnerable situation. Marginalisation and violence become easier when Muslims already exist at the margins of society with little to no bargaining power in the matrixes of Indian society. Today, with the hardline governance of the BJP, this violence has spilled into every aspect of public and private life, where what food may be in the refrigerator of a minority citizen can and will be used as a means to lynch him or her, as well as subsequently be used to legally persecute said individual even after death by lynching.⁴ Thus, apart from abysmal figures and structurally debilitating conditions for Muslims, universities and schools are not immune to the rampant violence against Muslims that is becoming more frequent by the hour. Muslim students in educational institutes face a growing frequency and intensity of violence.

Methodology

The data used in this chapter is predominantly secondary, drawn from

3 Waquar, S. M. (2021, September 28). Scrutinizing the Problem of Abysmal Muslim Representation at National Law Universities: a Question of Diversity and Inclusion. The Leaflet. <https://theleaflet.in/scrutinizing-the-problem-of-abysmal-muslim-representation-at-national-law-universities-a-question-of-diversity-and-inclusion/>

4 Ali, M. (2016, May 31). Dadri meat was beef, claims fresh forensic report. The Hindu. <https://www.thehindu.com/news/national/other-states/Dadri-meat-was-beef-claims-fresh-forensic-report/article60527795.ece>

news reports and fact-finding reports based on primary data which has been collected from Additionally, this report also consists of personal narratives that the author has come across, especially in the case of describing the incident of Najeed Ahmed, as primary data collected as part of the author's stay at the Jawaharlal Nehru University. In an attempt to situate the severity of the contemporary situation of Muslims in India and their immediate proximity to genocide, a brief, data-based background of the historically constructed socio-economic circumstances has been given in order to understand what are the factors that have aided the Muslim community's swift progression towards extreme vulnerability and marginality.

Exercising violence in educational institutes: Typologies and Practices

Violence against students from the margins comes forth in various measures and ways. It can be of several types and may come from several sources.

Symbolic violence can be categorised on multiple levels, which includes the level of the interpersonal in everyday incidents of Islamophobia in interactions with students, teachers, and staff. The second instance is where students from minority religions face systemic discrimination in terms of access to legal, financial, and educational resources. It is a type of violence that aims to diminish the presence of a social group in space by and large stigmatising its existence; this type is invariably linked to the second type of violence by and large as it creates the conditions of marginality for physical violence to take place with complete impunity. The second category of violence faced is direct, immediate, and undeterred - which comes in the form of physical attacks by students or targeted violence, be it physical or through less direct means, by law enforcement agencies, through police brutality and subsequent tactic of quelling resistance by incarcerating young students and drowning them with legal cases such as that hamper and diminish their quality of life and deplete them of the financial resources that they have.

There is rampant normalization of discrimination and dominant cultural ethos of the Hindi speaking spilling into educational spaces, through which minority students are cornered at the very stage of the entrance to

educational spaces.⁵

Communal violence in the form of riots and pogroms served to marginalise Muslims spatially, as well as socio-economically, to ghettos. These ghettos also began to serve as spaces for the state to enact surveillance to contain the Muslim population in one space. (Jamil, 2017) With respect to the development index, the Muslim population lags behind. In 2004, 41.2 percent of rural landowners were OBC, 30.7 percent others, and 19.7 and 8.4 percent were Scheduled Caste and Scheduled Tribes respectively. Muslims accounted for only 11 percent of land ownership on the other hand. Thereby, Muslims stand in the lower range in terms of having access to capital, which further translates into a lack of opportunities, education, and social mobility. The community fares poorly in the education sector, especially. About 4.2 percent of students enrolled in higher education are Muslims. (Robinson, 2008)

According to Sharif (1995), the rate of dropouts is highest amongst Muslims, from primary school onwards.⁶ At 42.7% the community has an illiteracy rate higher than the national average, according to the 2011 Census of India. The rate of Muslim dropouts is about 23.1 % is higher than the national average of 18.96%, with different states of the country having varying differences between the two, some states ranging at extreme differences.⁷ Even in minority-run schools, the number of Muslim students decreases with the increase in the level of education, and there are more students from the Hindu community in higher grades than Muslims. The Muslim community witnesses the lowest rate of enrolment in India.⁸ Although the literacy rates between Hindu women and Muslim women are

5Ataulla, N. (2022, May 20). Karnataka schools allow Puja and air rifles. National Herald. <https://www.nationalheraldindia.com/india/karnataka-schools-allow-puja-and-air-rifles>

6 Sharif, A. (1995, November 18). Socio-Economic and Demographic Differentials between Hindus and Muslims in India. Economic and Political Weekly. <https://www.epw.in/journal/1995/46/special-articles/socio-economic-and-demographic-differentials-between-hindus-and>

7 GoNews Desk. (2020, March 18). Muslim School Students Drop Out More Than National Average. GoNewsIndia. <https://www.gonewsindia.com/latest-news/news-and-politics/muslim-school-students-drop-out-more-than-national-average1-10674>

8 Bahri, C. (2016, July 23). Muslims have the lowest rate of enrolment in higher education in India. Scroll.in. <https://scroll.in/article/812272/muslims-have-the-lowest-rate-of-enrolment-in-higher-education-in-india>

less disparate, at 44% and 48 % respectively, the rate of literacy between Hindu men and Muslim men sees a far wider gap with 29 % and 37 % respectively.⁹ In both rural and urban areas, Muslims, followed by STs and SCs, are at the highest ‘risk’, i.e., most likely to drop out. (Sharif, 1995) However, it is seen in urban areas that Muslim girls are less likely to drop out than Muslim boys from at the secondary and higher secondary level of education. The reason behind this stipulated that males from the community are at a higher risk to attain financial security and thus are more likely to drop out and join the workforce and start earning meagre wages. Women on the other hand continue their education. It is also acceptable if a more educated Muslim woman marries a less educated Muslim male. (Sharif, 1995)

Institutional Murder of Muslims in Indian Campuses

In November 2019, the institutional murder of Fathima Latheef, a bright, young Muslim student, took place, at the Indian Institute of Technology, Madras (IIT-M).¹⁰ It was four months after joining the undergraduate programme in the social sciences department, that Fathima Latheef died by suicide in her hostel room. Her parents have recorded that she faced discrimination on the basis of her religion by faculty members and students, which is what compelled her to suicide. In a media statement by her parents, it was revealed that Fathima had informed her parents that her name itself was a problem on the campus. Despite widespread student protests and her parents' attempts to take legal action against the discrimination faced by Latheef, nothing led to any concrete steps. According to the parents, the police department of Tamil Nadu was even attempting to sabotage the enquiry.¹¹

Second is the case of Payal Tadvi, a Muslim doctor from one of India’s marginalised tribes, who was pursuing her Master’s in Obstetrics and Gy-

9 The Wire Staff. (2016, September 1). 42.7% of Muslims Illiterate, Reveals Census Data. The Wire. <https://thewire.in/education/census-literacy-religion>

10 Nath, A., Lobo, S., & Udayakumar, G. R. (2019, November 15). IIT Madras student Fathima Lateef death case: All you need to know. India Today. <https://www.indiatoday.in/india/story/iit-madras-student-death-fathima-latheef-1619357-2019-11-15>

11 Krishna, T., & Sharma, K. (2020, January 15). IIT Madras report on Fathima Latheef suicide 'silent on religious discrimination'. ThePrint. <https://theprint.in/india/iit-madras-report-on-fathima-latheef-suicide-silent-on-religious-discrimination/349723/>

nelocology in Mumbai's famed TN Topivala Medical College (TNMC) and was forced to die from suicide. She was forced to take this step after having faced humiliation, harassment and caste-ist and Islamophobic violence from her upper-caste Hindu colleagues for months on end. Before getting a room of her own, Dr Tadvi had to share a room with two upper caste Hindu women, who have been named as her harassers, who made her sleep on the floor and would wipe their feet on her mattress after using the washroom. Similarly, they would abuse her in front of patients and try to humiliate her, threatening to get her suspended. There are reports that she was also prevented from breaking her fast in the month of Ramadan.¹² Dr Tadvi had submitted verbal and written complaints to the college establishment to no avail; her harassment continued. Her husband Salman, a fellow doctor, had even requested the authorities for a transfer. Her husband stated that being prevented from participating in deliveries made her frustrated as she couldn't learn more. On the day of her death, many witnessed the accused scolding her in the operation theatre.

Payal Tadvi was reportedly the first person from her village to become a doctor and belongs to a tribe that has historically faced extreme vulnerability and precarity in India. She had dreams of opening a hospital in her village and providing safe access to healthcare and childcare to women.

Similar was the case of Kashmiri Muslim student, Mudassir Kamran.¹³ Mudassir Kamran was studying in the Indian city of Hyderabad in EFLU (English and Foreign Languages University) when he was found hanging in his hostel room. Kamran had been facing harassment by a fellow student, and by the university administration. In the wake of his death, many claims were perpetuated, some of them ranging from declaring him as a 'Kashmiri nationalist', and others calling aspersions on his sexuality. The university administration had reportedly labelled him, and subsequently, handed him over to the police. an incident after which he was found dead in his room. The incident happened in 2013 when an Indian court had awarded Kashmiri Muslim Afzal Guru the death penalty on grounds

12 K, D. (2019, May 29). With no institutional mechanisms, discrimination and harassment are everyday ordeals for tribal students. TwoCircles.net. <https://twocircles.net/2019may29/431534.html>

13 Mourning Mudassir's suicide: The tragic tale of a Kashmiri student. (n.d.). <https://www.sify.com/news/mourning-mudassirs-suicide-the-tragic-tale-of-a-kashmiri-student-news-columns-ndjazPjbdhdsi.html>

that Guru needed to be punished to satiate the collective conscience of the Indian nation; it was an era of high furores and heightened hostility towards Kashmiri Muslims in India. Similarly, in another incident in 2014, a Kashmiri student was found mysteriously dead in his medical institute in Chandigarh, Punjab. While the police said he died of fever and tried their best to close the case, his family alleged foul play and inconsistency in the police reports.¹⁴ Many Kashmiri Muslim students face considerable discrimination as well as mob violence from students and other residents while studying at universities in India.

These cases geographically distributed widely clearly illustrate the lack of redressal mechanisms for minority students in Indian education institutes, especially Muslim students. The Indian state, to date, has no law that recognizes the particularity of Islamophobia, nor has it any mechanism to address the large-scale bias against Muslims prevalent in Indian society.

Criminalising Muslim Students: No Exemption For Children

In January 2020, during the onset of the anti-CAA protests in India, a case of sedition, a colonial-era law used to persecute dissidents of the state, was filed in response to a school play performed by the students.¹⁵ Despite much uproar, a widowed mother of one of the students was arrested and detained by police officials in Karnataka. In addition to this, police officials also visited the students who performed the play and interrogated them, with two of the five police officers being armed as well; all the students interrogated ranged from the age of 9-12 years, according to the South Cell for Human Rights Monitoring which filed a writ petition in the same year arguing that interrogation the children in a 'hostile environment' violated the rights and dignity of children. This clearly outlined the fact that for the current regime, neither juvenile rights, nor constitutional morality can be a hindrance when it comes to targeting minority communities, especially when these communities are protesting for equal rights, as

14 Express News Service. (2021, June 28). 21-year-old Kashmiri youth found dead in his Chandigarh medical college hostel room. The Indian Express. <https://indianexpress.com/article/cities/chandigarh/21-year-old-kashmiri-youth-found-dead-in-his-hostel-room-at-gmch-32-7378707/>

15 Sharma, M. (2020, February 6). Protests In Bengaluru Over Sedition Case Against School For Anti-CAA Play. NDTV.com. <https://www.ndtv.com/karnataka-news/protests-in-bengaluru-over-sedition-case-against-school-for-anti-caa-play-2176053>

was witnessed in the duration of the anti-CAA movement.¹⁶ Students from Jamia Millia Islamia and Aligarh Muslim University took to the streets to register their protest against the Citizenship Amendment Act, and led the movement in Delhi and Aligarh, Uttar Pradesh. This movement was met with illegal police inaction in both the universities and subsequent criminalization of students. This further brings to light the FIRs filed against students of Jamia Millia Islamia, which is a minority institution and one of the leading central universities in the country. This movement saw a violent reaction from the government. Excessive police brutality led to more than a hundred students, who were predominantly Muslim students, being injured and maimed – where one student even lost his eye in Jamia Millia Islamia, and another student lost his hand in Aligarh Muslim University, reflecting the severity of the force utilized against students of these two universities. The state there onwards also charged students under various lawsuits, accusing them in turn, of creating violence.¹⁷

The Enforced Disappearance of Najeeb Ahmed

In October 2015, a Muslim student residing in India's premier institute for research and social sciences, Jawaharlal Nehru University, disappeared.¹⁸ Hailing from the northern state of Uttar Pradesh, Najeeb was in his first year of MSc. Biotechnology at the time of his forced disappearance. Najeeb Ahmed was found missing after an incident of violence where members of the student wing of India's ruling party BJP, the ABVP (Akhil Bharatiya Vidyarthi Parishad), attacked him in the hostel mess in the presence of the mess warden and the students' union of the university. The disappearance followed a spate of different campaigns which attempted to discredit Najeeb Ahmed. The then president of the JNU students' union signed a letter addressed to the warden, which declared Ahmed as

16 Express News Service. (2021, August 17). Sedition case against Bidar school: Police questioning kids prima facie violated rights, says Karnataka HC. The Indian Express. <https://indianexpress.com/article/india/sedition-case-against-bidar-school-police-questioning-kids-prima-facie-violated-rights-says-karnataka-hc-7457076/>

17 Express News Service. (2020, May 22). Delhi: Jamia student held again, under UAPA. The Indian Express. <https://indianexpress.com/article/cities/delhi/jamia-student-held-again-under-uapa-6421611/>

18 All you need to know about JNU student Najeeb Ahmed case. (n.d.). The Hindu. <https://www.thehindu.com/news/cities/Delhi/in-depth-look-at-the-jnu-student-najeeb-ahmed-case/article56832258.ece>

'mentally ill' and eschewed any mention of him being attacked in the hostel premises where he was targeted on the basis of his identity. Since the first day, when Ahmed was at the receiving end of violence, all involved parties who could have otherwise protected him and prevented his disappearance – including his roommate, hostel authorities, JNU Administration and media houses – projected him as a culprit. In the long-established practice of assigning negatives stereotypes to Muslims as intolerant, prone to violence, and inherently a threat to co-existence, the widely seen and witnessed violence was obfuscated and justified by an Islamophobic narrative that he was a violent, mentally disturbed individual who attacked innocent residents of the hostel, without any provocation. In the swirl of deliberate misinformation being spread to delegitimize Ahmed as a victim of a violent assault by anti-Muslim forces, it was said that he was 'provoked' by the mere sight of a red thread on someone's hand, a practise many Hindus adhere to. But this is a suggestion that is so improbable that it bounds on the impossible – but the narrative was spread unchecked and did the damage it was meant to. Ahmed's roommate wrote a letter – which he later denied on flimsy grounds – arguing that he felt threatened by his behaviour towards him. All of these elements further worked to render him utterly vulnerable and alone in the hostel, apart from being physically assaulted before the night of his disappearance.¹⁹

While, the police were quick to declare Najeeb as a terror suspect and member of ISIS or to be dismissive of the violence prior to his disappearance, arguing that he might have left for the neighbouring minority university, Jamia Millia Islamia, and was initially quite reluctant to file an FIR. The CBI (Central Bureau of Investigation) consequently took over the case after the Delhi Police and to date, has been unable to make any significant progress in the case. The CBI, a premier investigating agency under the Central government, also resorted to tactics of maligning Najeeb Ahmed; such attempts were accompanied by the media that sought to declare him a terrorist. The CBI also stated that it could not procure evidence from the phones of the accused because it was unable to break open the locks on their phones. Despite relentless pressure, the CBI and the Delhi Police have not made any progress in the case.

19 Wahab, H. U. (2016, October 18). Najeeb Ahmad missing: JNU bosses & police silent despite protests. Round Table India. <https://www.roundtableindia.co.in/amidst-protests-in-jnu-campus-administration-and-police-keep-mum/>

It is important to note that none of these events, despite the severity and gravity of each of these cases, suffice to merit any national outcry or concern, be it from the media, the legislative officials, the judiciary, or the general public. Therefore, the violence in each of these cases has been subsequently normalised as a precedent for further extreme violence to occur without any, if at all, outcry. The Normalisation of violence against Muslims has taken place with the help of the media, as has been amply documented. The media in India have been heavily invested in producing the Muslims as an enemy of the state and, thereby, the public, that must be treated with mistrust and disdain.

A Student is an entirely secular category, the school or the university is supposedly a neutral place where the minimum a state, as maintainer of public order, can ensure is the safety of the places of learning. Yet, for Muslims in India, the category of being a student is further utilised against them to push them into the category of criminality, to push them towards vulnerability through various politico-legal means. The university as a space is meant to be one that fosters learning, one that harbours an environment based on ethos that is practised wholeheartedly. Essentially, the university is a place wherein students should be safer from the prejudices and violence that runs deep in society. However, it exists as the opposite for India's Muslims, where the university becomes yet another site for majoritarian violence and discrimination. Aside from the numbers which show how difficult it is for Muslims to reach university, these recurring incidents of violence like the cases of Najeeb Ahmed and Fathima Lateef, or even the increased rate of cases being registered against Muslim students on utterly flimsy grounds, make for a dangerous environment wherein parents are understandably going to be unlikely to feel safe sending their children to study. Thus, state violence and discrimination serve to contain and perpetuate the very same cycle of fear and marginalisation to keep Muslims out of spaces that might afford them any form of social and economic mobility. For the student entering a university space wherein they may not find many students from their community nor any persons of influence, such as teachers or office bearers, representing their community and interests, the university space inevitably becomes alienating, distressing and isolating - not to mention dangerous, and hardly the environment where any student can study.

Police Brutality at India's Leading Universities

To further examine how university spaces are becoming sites of danger, near-death experiences and terror for students, we must visit the eve of a freezing December in India's capital, Delhi, when the city went into a frenzy. Panicked calls rang, students pleaded for help, and as sounds of shattering glass batons rang through as tear gas exploded everywhere in one of Delhi's acclaimed universities, rendering havoc and chaos. On 15th December, 2019, the Delhi Police and RAF (Rapid Action Force) entered the campus of an esteemed Muslim-minority university in the country's capital, Jamia Millia Islamia, and carried out unchecked violence against the students. Police brutality with the usage of tear gas and batons was unleashed on students over a set of two days. Students were forced to run and hide in houses, under trees, jump over walls, and seek refuge and shelter as they were hunted and attacked on their university premises.

The very same day, members of the RAF, a paramilitary wing under the jurisdiction of the Central government, and Uttar Pradesh Police entered the Aligarh Muslim University. They unleashed unchecked and barbaric violence on the residing students, destroyed university property – including the hostel rooms, and hurled anti-Muslim slurs. Students testify that they were tortured in police custody as well, after being attacked at the university, and were further denied medical attention.²⁰

These two federally administered universities are acclaimed universities of India and they were some of the primary focal points of the anti-CAA movement which saw a resurgence in 2019 in mainland India which was mainly led and initiated by the Muslim community, articulating at its length a staunch opposition towards discrimination on the basis of religion. Despite being situated in the prime locale of the nation's capital, Jamia Millia Islamia's students did not remain unscathed from the brutal recourse the government took to quell dissenting Muslims across the nation. Many of them recounted that the incident reminded them of many of the pogroms that had taken place before, and they were sure it was going to be their last day. Many videos and photographs turned up depicting

20 Yamunan, S. (2019, December 18). Aligarh Muslim University students allege they were tortured in police custody after Sunday protests. Scroll.in. <https://scroll.in/article/947178/aligarh-muslim-university-students-allege-they-were-tortured-in-police-custody-after-sunday-protests>

brutal violence meted out on students.²¹ The libraries, reading halls, and infrastructure of the institutes were attacked. Students attest that the CRPF (Central Reserve Peacekeeping Force) members used Islamophobic slurs as they attacked students with batons.

More than a hundred students were there onwards detained after the violence. It has been recounted that even heavily injured students were detained and refused medical attention, and in turn, were beaten as they were being taken away for detention. Contrary to claims, the JMI's Chief Proctor had stated that the police entered the university without the permission of the administration.²²

The only statement Prime Minister Modi released after this violence was inflammatory in itself as he stated, 'Those who commit violence can be identified by their clothes'.²³ The subtext of this statement was that Muslims could be identified by their clothes and that they were criminals. In the AMU, the RAF even entered the hostel rooms. Tear gas, and stun grenades were thrown inside hostel rooms and the university campus as students were charged brutally with batons. Students recalled that the RAF came with the intention of assault, and not to disperse crowds as was later claimed by officials. Indeed, the injuries of the students remain testament; a student's arm had to be amputated due to the injuries sustained, another lost their finger, and several others received equally serious injuries. Following the same pattern as JMI, police detained several people post the violence. The use of anti-Muslim slurs was also witnessed as was the beating up of individuals detained in the area. By and far, reports allege that violence by the RAF in AMU, Aligarh, was worse in comparison to that in Jamia.²⁴

21 PTI. (2020, February 18). Jamia violence: Another video of alleged police brutality emerges online. Deccan Herald. <https://www.deccanherald.com/national/jamia-violence-another-video-of-alleged-police-brutality-emerges-online-805766.html>

22 Kuchay, B. (2019, December 16). India police storm Jamia, AMU to break citizenship law protests. Al Jazeera. <https://www.aljazeera.com/news/2019/12/16/india-police-storm-jamia-amu-to-break-citizenship-law-protests>

23 Kiro, S. K. (2019, December 16). 'Look at Their Clothes': Modi Plays Communal Card on CAA, Targets Muslim Protestors. The Wire. <https://thewire.in/communalism/narendra-modi-citizenship-amendment-act-protests-clothes>

24 Ahmad, S. (2019, December 18). AMU: Student's Hand Amputated, 'Police Violence Worse Than In Jamia'. Outlook India. <https://www.outlookindia.com/website/story/>

The immediate day following the violence, orders to shut down the university from the District Administration of Aligarh arrived. About 13000 students for whom the university was a second home were asked to return to their families within the day –photographs of students leaving, especially women students, not knowing when they will return – were all over social media.

Incarceration Muslim Students and Scholars

There are numerous cases of Muslim students and scholars being harassed by the state or by the university administration in India. Many scholars that are persecuted by the state make the news as their vilification serves as lucrative cannon fodder for the media. There has been a consistent trend of vilifying Muslim students in the media using legal means. One of the cases most salient has been that of the former JNU student, Umar Khalid. He became a household name after he, along with nine other students, was charged with sedition in 2016 for allegedly organising protests against the killings of Maqbool Bhatt and Afzal Guru, both Kashmiris, and for raising ‘anti-India’ slogans at the protest in JNU. The incident unrolled a hue of harassment for all the students involved, including a media trial that linked Khalid to ‘militant outfits’.²⁵ Khalid was arrested and consequently released subsequently, however, the media trial and societal criminalization against him continued. JNU set up a high-level inquiry that recommended that he be expelled by the university, which was only prevented from taking place after Khalid took legal recourse.²⁶ Khalid took to activism after his release from prison, and is part of an organisation named United Against Hate. He has been a vocal critic of the current regime, due to which he has been brutally vilified by the media on several occasions. In 2018, Khalid even survived an assassination attempt against him as he was about to speak at an event in Delhi.²⁷

india-news-amu-amu-students-hand-amputated-police-violence-worse-than-in-jamia/344341

25 Khan, F. (2018, August 21). It wasn't the gun that targeted Umar Khalid, but the relentless state campaign. ThePrint. <https://theprint.in/opinion/it-wasnt-the-gun-that-targeted-umar-khalid-but-the-relentless-state-campaign/101745/>

26 Who is Umar Khalid. (2018, August 13). The Indian Express. <https://indianexpress.com/article/who-is/who-is-umar-khalid-jnu-kanhaiya-kumar-5304561/>

27 Shankar, A., & Manral, M. S. (2018, August 14). JNU's Umar Khalid has narrow escape, assailant's gun jams. The Indian Express. <https://indianexpress.com/article/>

Currently, Khalid is serving time as an undertrial detainee in Delhi's Tihar Jail under the charges of the draconian UAPA for allegedly inciting people to violence due to which the 2020 North-East Delhi pogrom took place.²⁸

In January 2020, another student of JNU, Sharjeel Imam was charged with several cases after which he surrendered to the Delhi Police in India's northern state, Bihar. Imam, a 33-year-old research scholar at the Centre for Historical Studies at JNU and a graduate from Indian Institute of Technology Bombay, is known for his pivotal role as an activist during the anti-CAA movement and intellectual from the Muslim community, particularly known for his call for road blockade or 'chakka jam' as a mode of protest in Delhi's Shaheen Bagh residential colony. His role in mobilising, organising and sensitising the people to the particularities of state violence against minorities throughout the anti-CAA and anti-NRC at the Shaheen Bagh protests has been crucial. The Delhi Police has filed a 600-page chargesheet against Imam which claimed that Imam was highly radicalised and a religious bigot by reading certain literature. Internationally renowned, Washington University's Emeritus faculty member and political scientist, Paul Brass' book *Forms of Collective Violence: Riots, Pogroms, and Genocide in Modern India* were presented as evidence of Imam's alleged radicalisation.²⁹

Thus, in January 2020, five states of the Indian union, including Assam, Manipur, Uttar Pradesh, Delhi, and Arunachal Pradesh, filed a sedition case against Sharjeel Imam for his alleged incendiary speech.³⁰ The speech

india/umar-khalid-shot-constitution-club-of-india-delhi-unhurt-5304467/

28 Thapliyal, N. (2022, May 24). [Delhi Riots] Umar Khalid In Prison Since 2 Yrs Merely On Basis Of A Hearsay Witness Statement Unrelated To Violence: Argument For Bail In High Court. Live Law. <https://www.livelaw.in/news-updates/delhi-riots-umar-khalid-bail-hearing-high-court-two-years-undertrial-199983>

29 Maktoob Staff. (2020, September 21). In JNU, Sharjeel Imam read Paul Brass's book and now Delhi Police chargesheet says it is an evidence. Maktoob media. <https://maktoobmedia.com/2020/09/21/in-jnu-sharjeel-imam-read-paul-brasss-book-and-now-delhi-police-chargesheet-says-it-is-an-evidence/>

30 Assam Police was the first to file an FIR against Imam under the charges of section 13 (1)/18 of UAPA Act, along with sections 153A, 153B and 124A of the Indian Penal Code (IPC), following which the in Uttar Pradesh, the Aligarh Police also filed a case against him for sedition and 'creating enmity between groups'. Manipur police filed a lawsuit against him for sedition, vilification and attacks on a particular community or conspiracy to commit offences as well as waging war against the Indian govern-

was 40-minute long given in Aligarh, in which he called for a collective, democratic protest against the excesses of the state. Before this, he was subjected to a vitriolic media trial by the various right-wing, pro-government media channels and web portals, including Republic TV and OpIndia, who ran a series of hate campaigns against Imam, attempting to portray the 33-year-old scholar as an extremist. OpIndia, a right-wing web-portal, consistently released articles labelling Imam as an ‘Islamist’, ‘Violent’, and ‘Jihadi’, and even tried to link him to bomb blast attacks in Assam.³¹ Republic TV, another news channel ran similar campaigns, terming him as a ‘conspirator’, ‘mastermind’ and so on, pronouncing a judgement before his trial started, and thus ran a media trial against the scholar. Despite these attempts, it is important to note that the basis of the criminality of Imam, as well as many of the scholars and activists such as Umar Khalid and others during court hearings as well as media narratives was established on flimsy grounds.

The Shiv Sena, a political party from the north-western state of Maharashtra, issued an open call for Imam’s hands to be cut off, and a day later, a BJP MLA and prime accused in Muzaffarnagar violence even demanded that people "who talk of breaking India must be shot dead publicly".³² Even though he was already in custody since January, Imam was falsely accused by the Delhi Police Special Cell in connection with the anti-Muslim pogrom that occurred in the North-eastern regions of Delhi in February 2020. Though the pogrom happened around a month after Imam surrendered before the police in good faith, his arrest as a co-accused remains a given that he was in the custody of the state during the duration of the anti-Muslim violence in Delhi which occurred in February 2020. As a response, The JNU Students’ Union and the JNU Teachers’ Association

ment, sections 121/121-A/124-A/120-B/153 of the IPC. The following day, Arunachal Pradesh's Itanagar police filed another case of sedition and promoting enmity between groups under sections 124-A, 153(A) and 153(B) of the IPC. The Delhi police, too, filed an FIR under IPC's section 153, including charges of sedition and promoting religious enmity.

31 Thapliyal, N. (2022, May 24). [Delhi Riots] Umar Khalid In Prison Since 2 Yrs Merely On Basis Of A Hearsay Witness Statement Unrelated To Violence: Argument For Bail In High Court. Live Law. <https://www.livelaw.in/news-updates/delhi-riots-umar-khalid-bail-hearing-high-court-two-years-undertrial-199983>

32 Web Desk. (2020, January 31). Sharjeel Imam's hand should be cut off, says Shiv Sena. The Week. <https://www.theweek.in/news/india/2020/01/31/sharjeel-imams-hand-should-be-cut-off-says-shiv-sena.html>

released various statements which condemned his statements and actions. Similarly, in the university, graffiti calling out for the release of Imam was vandalised and replaced with the words ‘Hang Sharjeel Imam’.

Imam is not the only scholar or Muslim individual who faces targeted persecution by the state and character assassination by the media but a closer look at his case serves as the purpose of looking at the mode of operation of criminalising Muslims, and Muslim scholars and activists, in India; a consensus of media, government, and the public service to push Muslims lives as easily dispensable and ungrievable. The state seemed on portraying all anti-CAA protestors as the catalyst to the violence. At the same time, those who have on public record extorted people into committing violence against Muslims to remain free.³³ Along with Imam, a dozen such student leaders are already languishing in jails; some of them include Umar Khalid, Gulfisha, Meeran Haider, and the president of the Alumni Association of Jamia Millia Islamia (AAJMI), Shifa ur Rehman.³⁴

Every year multiple cases of Kashmiri students being terrorised in universities come to the fore; incidents are similar, they are terrorised, and many times beaten by mobs calling out violent slogans which often occur during India versus Pakistan cricket matches. The university as well as the local administration rarely, if ever, pursues legal or punitive action against these mobs and instead, it is the Kashmiri students themselves who are arrested and face legal action in return.³⁵

The Case of the Hijab

In December 2021, news reports emerged that in the Udupi district of Karnataka, Muslim students were barred from entering their classrooms because they were wearing the hijab. This incident soon followed simi-

33 The Wire Analysis. (2021, December 22). Hindutva Leaders at Haridwar Event Call for Muslim Genocide. The Wire. <https://thewire.in/communalism/hindutva-leaders-dharma-sansad-muslim-genocide>

34 Jha, A. (2022, April 5). Delhi riots case: Delhi court denies bail plea of Jamia student Meeran Haider. India Today. <https://www.indiatoday.in/law/story/delhi-riots-case-delhi-court-denies-bail-plea-jamia-student-meeran-haider-1933900-2022-04-05>

35 Express News Service. (2021, June 28). 21-year-old Kashmiri youth found dead in his Chandigarh medical college hostel room. The Indian Express. <https://indianexpress.com/article/cities/chandigarh/21-year-old-kashmiri-youth-found-dead-in-his-hostel-room-at-gmch-32-7378707/>

lar cases being reported from elsewhere in the state as well. It also led to Hindu students in these colleges organising protests against the hijab, arguing that if they could wear hijab, then Hindu students must also wear saffron shawls and come to college.³⁶ Muslim students, both girls, and boys, protested against this supposed hijab ban. This spread across various districts in Karnataka and soon the media picked it up and what followed can be only said to be media and state lead direct harassment of the Muslim women students of Karnataka.

As protests spread across the BJP-ruled state, scores of Muslim students were witnessed protesting outside the gates of their schools and colleges, demanding to be let in and continue their classes. Videos and various reports emerged of hijab and burqa-wearing students being harassed by their Hindu classmates.³⁷ In one instance in February, the students wearing Hijab were allowed to enter the school but were made to sit in a separate classroom and not with the rest of the class. During this duration, an official from the education department came and met them, asking them to give up their hijabs, or miss out on their education. The Muslim students argued that they had always worn the hijab, and it had never been a problem till now, and what was happening was extremely humiliating and hurtful for them. The BJP on the other hand defended the ban arguing that students should not bring religion in the classroom and the state government even initiated an investigation in the protests to wear the hijab, insinuating that there were ‘vested interests’ that were inciting the Muslim students to protest.³⁸ The matter was pursued in court and before the case could continue, the court passed an interim order that banned any religious clothing from the classroom. Thus, the Muslim students continued to miss their classes as the hijab ban continued. Eventually, the court too upheld the Hijab Ban arguing that the hijab was not a practice essential

36 Sabarwal, H. (2022, March 15). Karnataka hijab row: The controversy explained. Hindustan Times. <https://www.hindustantimes.com/cities/bengaluru-news/karnataka-hijab-row-a-lowdown-on-controversy-101647322178558.html>

37 Chakraborty, A. (2022, February 8). Karnataka hijab row: Mob chanting 'Jai Shri Ram' accosts girl, she responds with 'Allah-hu-Akbar'. IndiaToday. <https://www.indiatoday.in/india/karnataka/story/karnataka-hijab-row-mob-chanting-jai-shri-ram-accosts-girl-she-responds-with-allah-hu-akbar-1910334-2022-02-08>

38 Khan, R. F. (2022, February 9). 'Targeted harassment': Muslim girls in India denounce hijab ban. Al Jazeera. <https://www.aljazeera.com/news/2022/2/9/cant-just-remove-it-protest-around-hijab-in-indias-karnataka>

to the religion of Islam. The order also recommended the investigation of Muslim groups for their alleged radical ideas.

While the case was being fought in the courts, Muslim women students were not just missing out on their classes, assignments, and exams but were also facing sheer humiliation and harassment by the media, right-wing groups, and the public discourse that followed. A harrowing video emerged of a young Hijab-wearing school girl being chased by media personnel who did the rounds on social media, providing a glimpse of the cost Muslim students are being asked to pay for attempting to access education.³⁹ The media constantly harassed students, leading to the District Welfare Committee of Shimoga, one of the sites of the restriction on Hijab, to issue notices to some of the media houses for violation of minor children's privacy and rights.⁴⁰ Instead of engaging in any attempt to contain the situation or listen to the grievances of the Muslim students, the BJP, and all its defendants continued to blame Muslims and tried to label these protests as a security threat against the nation, as a president of the college development committee of one of the schools banning Muslim students with hijab, who is also a BJP member, argued that this was an 'international conspiracy'. Following these events, even teachers were forced to remove their hijabs and burkhas outside of these institutions, which even led to one Muslim woman resigning from her post. These events were replicated sporadically across the country as well.⁴¹ The consequent verdict by the Karnataka High Court, placed a restriction on wearing hijab inside educational institutions in the state. What was also evident from this was that the students who were forced to miss their classes and exams due to

39 NL Team. (2022, February 15). Watch: 'Reporter' chases students wearing hijab in Karnataka school. NewsLaundry. <https://www.newslaundry.com/2022/02/16/watch-reporter-chases-student-wearing-hijab-in-karnataka-school>

40Asiya, S. (n.d.). Unethical Media Coverage Of Karnataka Hijab Row By Kannada Channels Increasing Harassment Of Muslim Students, Women. The Cognate. <https://thecognate.com/unethical-media-coverage-of-karnataka-hijab-row-by-kannada-channels-increasing-harassment-of-muslim-students-women/>

41 Our Political Bureau. (2022, February 19). Teacher quits after she was 'asked' to remove hijab in Karnataka. The Economic Times. <https://economictimes.indiatimes.com/news/india/teacher-quits-after-she-was-asked-to-remove-hijab-in-karnataka/articleshow/89672840.cms?from=mdr>; The Wire Staff. (2022, February 14). Staff, Students Asked to Remove Hijab at Gates as Karnataka Schools Reopen. The Wire. <https://thewire.in/women/staff-students-asked-to-remove-hijab-at-gates-as-karnataka-schools-reopen>

the hijab ban would probably have to repeat their exams or perhaps, even quite the school and colleges given the extreme levels of hostility present not just from the administration but also from the students, who in many places had protested against the hijab by wearing saffron shawls.

It is evident through examining these instances that the state produces Muslims as criminals and actively persecutes Muslim scholars and students in schools, universities, and other institutes effectively, even when Muslims, as seen in the hijab case, have been survivors of violence and harassment.

Many Muslim students have written⁴² and spoken⁴³ about the dangerous and precarious position they find themselves in when they're in an Indian university. It obviously makes no difference whether the university has a high population of Muslims (As seen in the case of Jamia Millia Islamia, and Aligarh Muslim University), or they are in a space wherein Muslim representation is sparse (Jawaharlal Nehru University, the IIT), Muslims are at risk, an increased risk given that there is little hope of legal or political recourse from existing democratic institutions in India which have been touted to not just been biased against Muslims but to have actively participated in establishing and making Islamophobia as a norm in Indian society, as witnessed in the Karnataka High Court's judgment on hijab. It has not been uncommon to witness faculties making Islamophobic statements to students, on a daily basis, nor is it uncommon to find these particularly anti-Muslim faculty members appointed in positions of increased authority.⁴⁴ In Jawaharlal Nehru University, the first women vice-chancellor was appointed; the new administrator was alleged to have had a Twitter account on which blatantly anti-Muslim vitriol was tweeted

42 Imam, S., & Salim, S. (2017, April 9). JNU: Left-wing students shouldn't act superior, Islamophobia is running rampant among them-India News. Firstpost. <https://www.firstpost.com/india/islamophobia-in-jnu-is-also-rampant-among-left-wing-student-organisations-claiming-to-be-secular-3375398.html>

43 Maktoob Staff. (2022, February 7). "I feel scared": Muslim student responds to new JNU VC's genocide calls. Maktoob media. <https://maktoobmedia.com/2022/02/07/i-feel-scared-muslim-student-responds-to-new-jnu-vcs-genocide-calls/>

44 HT Correspondent. (2019, December 16). After Jamia and AMU, Nadwa in Lucknow erupts in protest over citizenship law. Hindustan Times. <https://www.hindustantimes.com/india-news/after-jamia-and-amu-nadwa-in-lucknow-erupts-in-protest-over-citizenship-law/story-CVUhv5DKHst9CDwgf3slQK.html>

regularly.⁴⁵ Thereby, it would not be an overreach to state that universities for Muslims in India are increasingly a dangerous place, and this danger continues to perform the function of keeping Muslims away from education and thereby, social mobility which further increases their vulnerability and reduces their access to places of learning, access to institutions, and succeeds in ensuring that the articulation of resistance or even redressal of grievances that the community might have is limited and muted.

Conclusion

The university as well as the schools and colleges have proven to be unsafe for Muslim students, where any Muslim student is in constant threat of death, unfair and untruthful legal persecution, and violence and humiliation. For the many first-generation students who come to university, the prospect of facing violence makes it even more difficult to come and access education in a territory that is entirely unfamiliar to them. For Muslim scholars, particularly those who wish to research and document the historical violence their communities have been subjected to, being present in the university and pursuing research has become a precarious, risk filled process. They might not know the next minute they will be served an FIR for examining the government's role in persecution or they might be beaten up by their fellow students. The lack of Muslims in positions of power, namely college and university boards, student union representation, and even as members of faculty, makes it an even more difficult and dangerous environment for young Muslims accessing education, many of whom do so for the first time in their families.

Given the immediate presence of violence and unsafe atmosphere in schools and universities in India, it is of urgent need that Anti-Discrimination and Minority Cells must be established in universities, technical institutes, as well as schools to deal with discrimination, complaints, scholarship disbursements for minority students. More commissions need to be created to investigate the situation of Muslims in and out of the university system.

45 Maktoob Staff. (2022, February 7). "I feel scared": Muslim student responds to new JNU VC's genocide calls. Maktoob media. <https://maktoobmedia.com/2022/02/07/i-feel-scared-muslim-student-responds-to-new-jnu-vcs-genocide-calls/>

Annexures

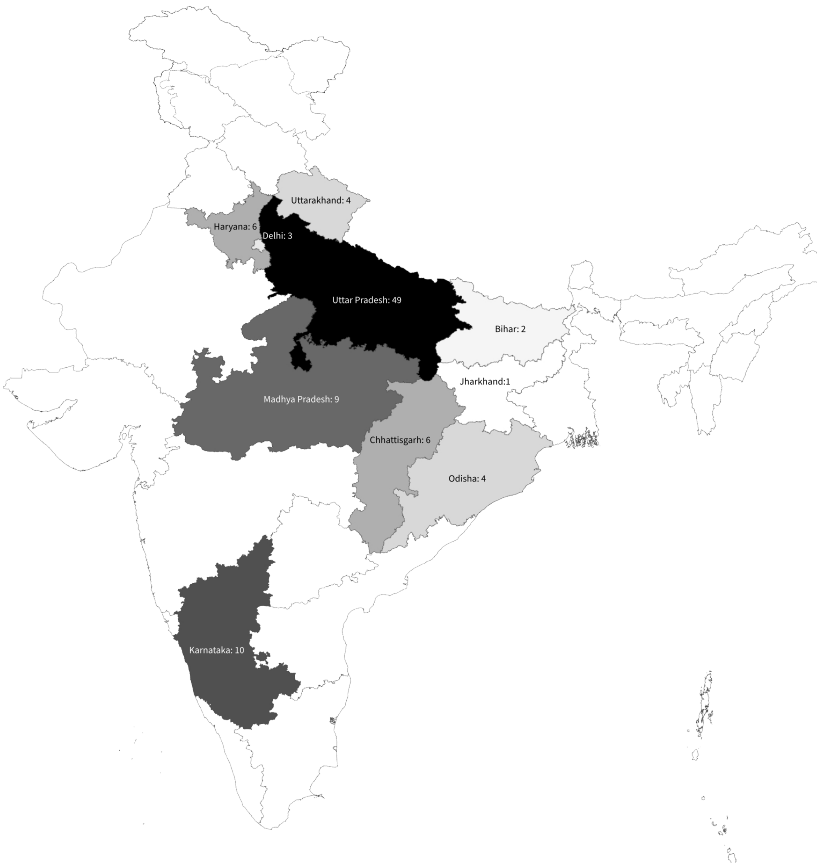
Chapter 01: Hate Crimes And The Case Of Religious Minorities In India

Annexure 01:

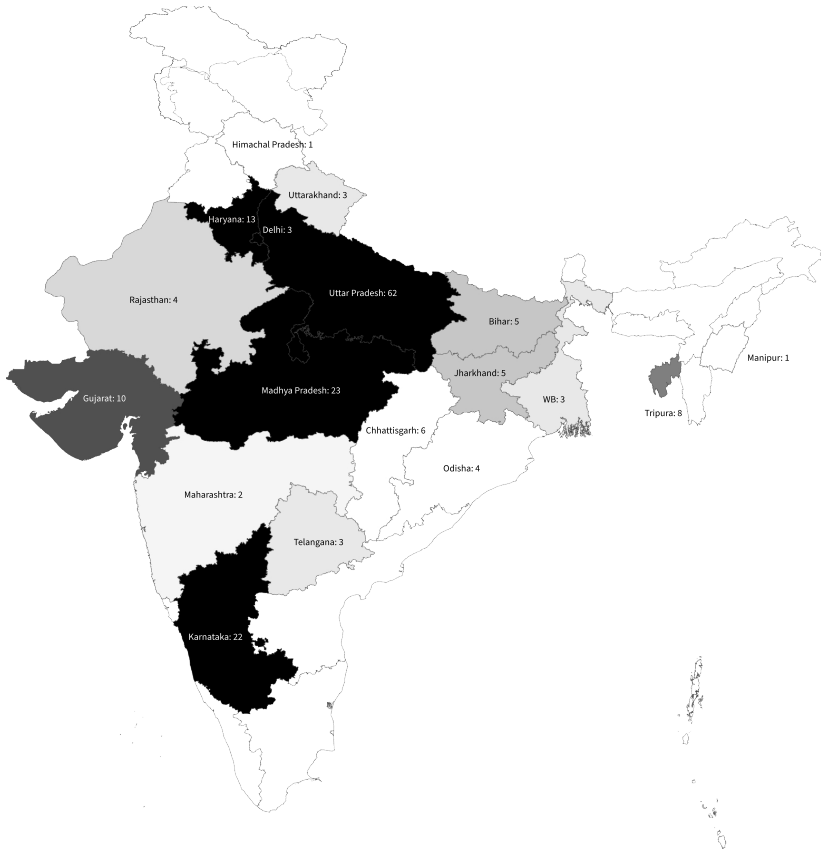
This is a non-comprehensive list/database of all the hate crimes committed against Christians, Muslims, and Sikhs in the year 2021. These numbers are only representative of the actual figures which are estimated to be more than what is recorded here.

Statewise hate crimes committed against religious minorities throughout the year 2021:

Christians:



Muslims:



Sikhs:



Chapter 2: Minorities on Prime Time: An inquiry into the portrayal of Christians, Muslims, and Sikhs on Television News

	Aaj Tak	Aaj Tak	India Today	India Today	NDTV	NDTV
Shows	314	100%	230	100%	249	100%
Shows featuring minority panellists	127	40.44%	92	40%	53	21%
Topics of total shows		100%		100%		100%
Court/Judicial	3	0.95%	10	4.34%	13	5.22%
Crime	13	4.14%	18	7.82%	3	1.20%
Economics/Business	8	2.54%	10	4.34%	17	6.82
Foreign Affairs	19	6.05%	19	8.26%	4	1.60%
Government	24	7.64%	15	6.52%	61	24.49%
Health	36	11.46%	37	16.08%	31	12.44
Military/War/Defense	4	1.27%	10	4.34%	12	4.81%
Science/Technology/Development	8	2.54%	11	4.78%	9	3.61%
Social Issues/Education	10	3.18%	18	7.28%	33	13.25
Politics	155	49.36%	71	30.86%	32	12.85%
Films/Television	3	0.95%	0	0%	3	1.20%
Minority	2	0.63%	1	0.43%	0	0%
Protest	24	7.64%	7	3.04%	30	12.04%
Terrorism	3	0.95%	0	0%	0	0%
Sports	2	0.63%	3	1.30%	1	0.40%
Total shows related to minorities	60	19.10%	37	16.08%	23	9.23%
Total positive Shows related to minorities	0	0%	1	0.43%	4	1.60%
Positive shows related to Sikhs	0	0%	0	0%	1	0.40%
Positive shows related to Muslims	0	0%	1	0.43%	3	1.20%
Positive shows related to Christians	0	0%	0	0%	0	0%

	Aaj Tak	Aaj Tak	India Today	India Today	NDTV	NDTV
Total Negative Shows related to minorities	57	18.15%	34	14.78%	0	0.00%
Negative Shows related to Sikhs	1	0.31%	2	0.86%	0	0.00%
Negative Shows related to Muslims	56	17.83%	32	13.91%	0	0.00%
Negative Shows related to Christians	0	0%	0	0%	0	0%
Total Neutral shows related to minorities	3	0.95%	2	0.86%	19	7.63%
Neutral shows related to Sikhs	0	0%	0	0%	0	0%
Neutral shows related to Muslims	3	0.95%	2	0.86%	19	7.63%
Neutral shows related to Christians	0	0%	0	0%	0	0%
Total referrals to Sikhs	1	0.31%	2	0.86%	1	0.40%
Positive shows related to Sikhs	0	0%	0	0%	1	0.40%
Negative Shows related to Sikhs	1	0.31%	2	0.86%	0	0%
Neutral shows related to Sikhs	0	0%	0	0%	0	0%
Total referrals to Muslims	59	18.78%	35	15.21%	22	8.83%
Positive shows related to Muslims	0	0%	1	0.43%	3	1.20%
Negative Shows related to Muslims	56	17.83%	32	13.91%	0	0.00%
Neutral shows related to Muslims	3	0.95%	2	0.86%	19	7.63%
Total referrals to Christians	0	0%	0	0%	0	0.00%

	Aaj Tak	Aaj Tak	India Today	India Today	NDTV	NDTV
Positive shows related to Christians	0	0%	0	0%	0	0%
Negative Shows related to Christians	0	0%	0	0%	0	0%
Neutral shows related to Christians	0	0%	0	0%	0	0%
Total shows related to minorities	60	100%	37	100%	23	100%
Total positive Shows related to minorities	0	0%	1	2.70%	4	17.39%
Total Negative Shows related to minorities	57	95%	34	91.89%	0	0.00%
Total Neutral shows related to minorities	3	5%	2	5.40%	19	82.60%
Total conspiracy theories	5	1.59%	4	1.73%	0	0%
conspiracy theories against sikhs	0	0%	1	0.43%	0	0%
conspiracy theories against Muslims	5	1.59%	3	1.30%	0	0%
conspiracy theories against Christians	0	0%	0	0%	0	0%
Total conspiracy theories	5	100.00%	4	100%	0	0%
conspiracy theories against sikhs	0	0%	1	20%	0	0%
conspiracy theories against Muslims	5	100%	3	80%	0	0%
conspiracy theories against Christians	0	0%	0	0%	0	0%
Total shows targeting minorities	14	4.45%	8	3.47%	0	0%
shows targetting sikhs	2	0.63%	1	0.43%	0	0%

	Aaj Tak	Aaj Tak	India Today	India Today	NDTV	NDTV
shows targeting muslims	12	3.82%	7	3.04%	0	0%
shows targeting christians	0	0%	0	0%	0	0%
Total shows targeting minorities	14	100%	8	100%	0	0%
shows targeting sikhs	2	14.28%	1	12.50%	0	0%
shows targeting muslims	12	85.71%	7	87.50%	0	0%
shows targeting christians	0	0%	0	0%	0	0%
Total Panellists	1286	100%	946	100%	342	100%
Total minority panellists	192	14.93%	151	15.96%	59	17%
Sikh panellists	45	3.49%	22	2.32%	7	2.04%
Muslim panellists	147	11.43%	95	10.04%	49	14.32%
Christian panellists	0	0%	34	3.59%	3	0.87%
Total minority panellists	192	14.93%	151	15.96%	59	17%
Independent panellists	62	32.29%	105	69.53%	54	92%
(Political Party)Sikh panellists	130	67.70%	46	30.46%	5	8.47%
Sikh panellists	45	100%	22	100%	7	100.00%
Independent Sikh panellists	14	31.11%	12	54.54%	5	71%
(Political Party)Sikh panellists	31	68.88%	10	45.45%	2	28.57%
Muslim panellists	147	100%	95	100%	49	100%
Independent Muslim panellists	48	32.65%	66	69.47%	46	93.87%

	Aaj Tak	Aaj Tak	India Today	India Today	NDTV	NDTV
(Political Party) Muslim panellists	99	67.34%	29	30.52%	3	6.12%
Christian panellists	0	100%	34	100%	3	100%
Independent Christian panellists	0	0	27	79.41%	3	100%
(Political Party) Christian panellists	0	0%	7	20.58%	0	0%

Chapter 3: Journalism as Hitjob: A Comparative Analysis of how Muslims, Sikhs and Christians are reported in Indian Newspapers

January:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.576	0.131	2.448	1.64	Significant
Sikhs	0.473	0.297	0.851	1.64	Insignificant
Christian	0.875	0.125	0.741	1.64	Insignificant

February:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.542	0.158	2.378	1.64	Significant
Sikhs	0.439	0.122	1.062	1.64	Insignificant
Christian	0.600	0.200	0.384	1.64	Insignificant

March:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.518	0.132	2.459	1.64	Significant

Sikhs	0.400	0.343	0.181	1.64	Insignificant
Christian	0.600	0.300	0.490	1.64	Insignificant

April:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.480	0.207	2.063	1.64	Significant
Sikhs	0.277	0.170	0.285	1.64	Insignificant
Christian	0.625	0.250	0.506	1.64	Insignificant

May:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.346	0.264	0.529	1.64	Insignificant
Sikhs	0.157	0.333	-0.609	1.64	Insignificant
Christian	0.000	0.667	NA	1.64	NA

June:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.632	0.165	2.793	1.64	Significant
Sikhs	0.284	0.337	-0.266	1.64	Insignificant
Christian	0.600	0.000	NA	1.64	NA

July:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.678	0.167	2.719	1.64	Significant
Sikhs	0.226	0.339	-0.452	1.64	Insignificant
Christian	0.714	0.286	0.579	1.64	Insignificant

August:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.645	0.172	2.709	1.64	Significant
Sikhs	0.159	0.455	-1.022	1.64	Insignificant
Christian	0.000	0.500	NA	1.64	NA

September:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.750	0.088	2.448	1.64	Significant
Sikhs	0.190	0.293	-0.375	1.64	Insignificant
Christian	0.667	0.000	NA	1.64	NA

October:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.834	0.075	3.282	1.64	Significant
Sikhs	0.416	0.429	-0.067	1.64	Insignificant
Christian	0.750	0.167	0.805	1.64	Insignificant

November:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.712	0.076	2.435	1.64	Significant
Sikhs	0.357	0.452	-0.363	1.64	Insignificant
Christian	0.667	0.333	0.314	1.64	Insignificant

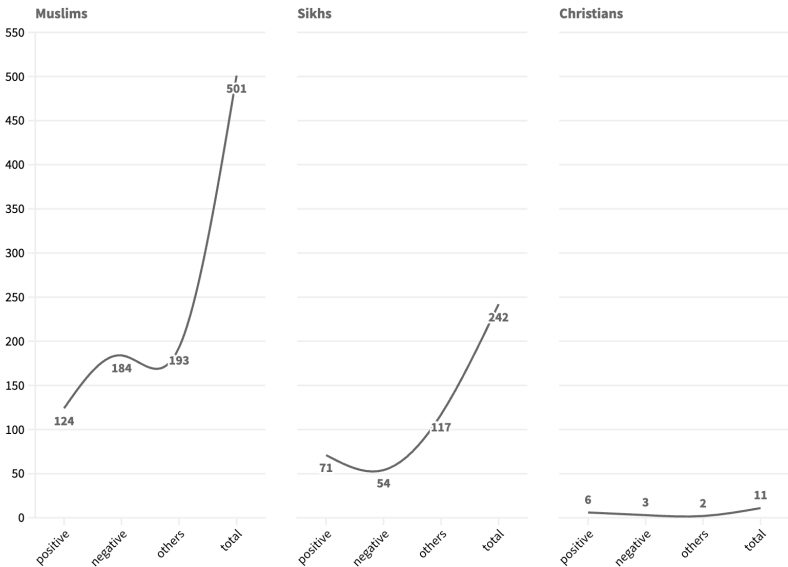
December:

Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.729	0.164	3.260	1.64	Significant
Sikhs	0.243	0.568	-1.671	1.64	Insignificant
Christian	1.000	0.000	NA	1.64	NA

Half-yearly analysis of Indian Express: January 2021- June 2021

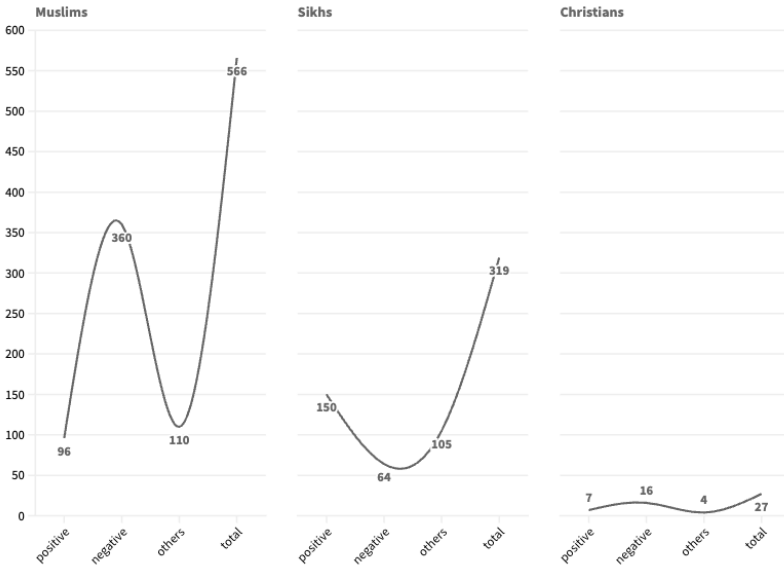
Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.367	0.248	1.246	1.64	Insignificant
Sikhs	0.223	0.293	-0.528	1.64	Insignificant
Christian	0.273	0.545	-0.546	1.64	Insignificant

July 2021- December 2021



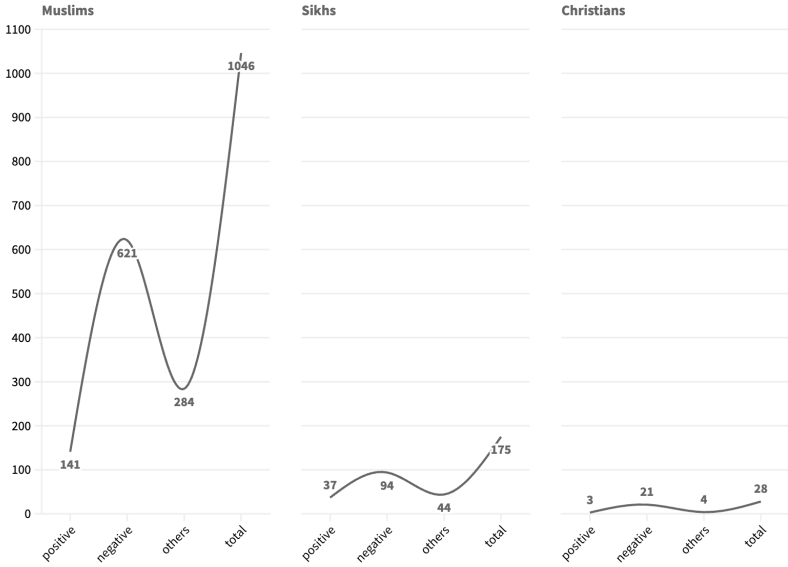
Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.636	0.170	4.426	1.64	Significant
Sikhs	0.201	0.470	-2.646	1.64	Insignificant
Christian	0.593	0.259	0.837	1.64	Insignificant

Half-yearly analysis of Dainik Jagran

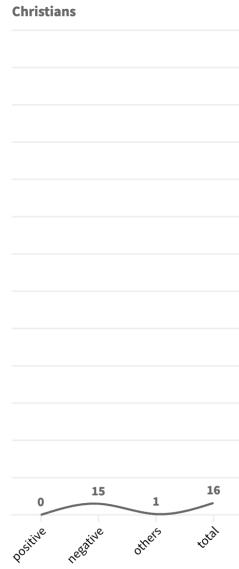
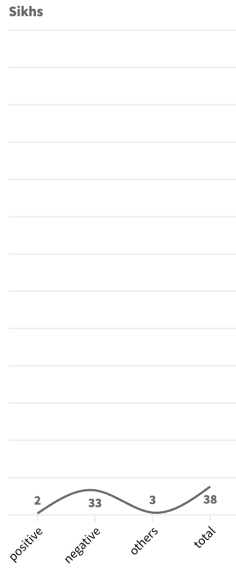
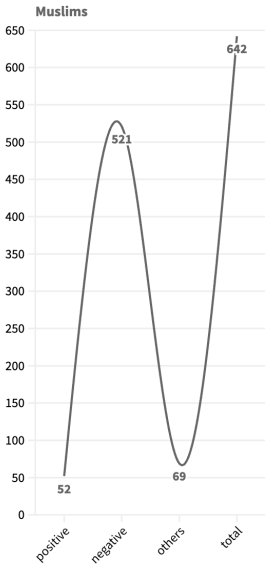


Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.594	0.135	5.301	1.64	Significant
Sikhs	0.537	0.211	1.891	1.64	Significant
Christian	0.750	0.107	1.096	1.64	Insignificant

July 2021-December 2021



Religion	P1	P2	Z calculated	Z tabulated	Level of significance
Muslims	0.812	0.081	5.219	1.64	Significant
Sikhs	0.868	0.053	1.149	1.64	Significant
Christian	0.938	0.000	NA	1.64	NA



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Chapter 05: Universities as sites of resistance: Journey of Muslims to and in Higher Education

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