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WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal providededicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

# REPRESENTATION AND PARTICIPATION OF WOMEN IN ADMINISTRATIVE POSITIONS OF RELIGIOUS INSTITUTIONS IN INDIA: A REVIEW

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#### **Abstract**

Religion has been a significant part of Indian culture for centuries and continues to play a significant role in shaping the social, political, and economic aspects of Indian society. Women have been an integral part of religious institutions, but their role in administration and decision-making has been limited. This paper aims to examine the role of women in the administration of religious institutions in India and the challenges they face in this sphere. The paper draws on a review of the relevant literature and case studies of religious institutions in India, to shed light on the current status of women in religious administration and their potential to contribute to the development of these institutions.

Keywords: Representation and Participation Gender Equality, Religious Administration, Social and Cultural Factors, Religious Freedom etc.

#### Introduction

Religious institutions have been a crucial part of Indian society for centuries and continue to play a significant role in shaping the social, political, and economic aspects of Indian society<sup>1</sup>. The role of women in religious institutions has been a subject of discussion and debate in many societies around the world, including India<sup>2</sup>. These institutions range from small local temples and shrines to large,

<sup>&</sup>lt;sup>1</sup> Kalaramadam, S. (2018). Presence into participation and representation: Gender quotas in local governance in India. Journal of South Asian Development, 13(1), 1-23.

<sup>&</sup>lt;sup>2</sup> Jayal, N. (2006). Representing India: Ethnic diversity and the governance of public institutions. Springer.

complex organizations, such as the Hindu Mathas, Jain Derasars, Churches, Gurudwaras and Buddhist Viharas. Despite the significance of these institutions, the role of women in their administration has been limited, and their participation in decision-making has been restricted to a few designated areas<sup>3</sup>.

Religious institutions play a significant role in shaping the beliefs, values, and practices of individuals and communities in India<sup>4</sup>. Despite the central role that religious institutions play in society, women have historically been excluded from participating in the administration of these institutions<sup>56</sup>. This exclusion is rooted in patriarchal beliefs and cultural norms that have perpetuated the idea that women are inferior to men and are not capable of holding leadership positions in religious institutions<sup>7</sup>. In recent years, there has been a growing movement for the empowerment of women and the promotion of gender equality in India<sup>8</sup>. This movement has been led by women's organizations and feminist groups who have challenged the traditional patriarchal structures and norms that have limited the role of women in religious institutions. As a result, there has been a gradual increase in the representation of women in religious leadership positions, and there is now a growing recognition of the important role that women can play in the administration of religious institutions.

The study of the role of women in the administration of religious institutions in India is significant for several reasons. First, it provides a comprehensive understanding of the role of women in religious institutions in India and highlights the challenges faced by women in this context. Second, the study sheds light on the importance of promoting gender equality in religious institutions and the benefits of greater involvement of women in the administration of these institutions. Third, the findings of this study can inform policies and practices aimed at promoting greater gender equality in religious institutions and support the advancement of women in these institutions. Furthermore, the study can

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<sup>&</sup>lt;sup>3</sup> Bryld, E. (2001). Increasing participation in democratic institutions through decentralization: Empowering women and scheduled castes and tribes through panchayat raj in rural India. Democratization, 8(3), 149-172.

<sup>&</sup>lt;sup>4</sup> Haq, R. (2013). Intersectionality of gender and other forms of identity: Dilemmas and challenges facing women in India. Gender in Management: An International Journal, 28(3), 171-184.

<sup>&</sup>lt;sup>5</sup> Mayya, S. S., Martis, M., Ashok, L., & Monteiro, A. D. (2021). Women in higher education: are they ready to take up administrative positions?—a mixed-methods approach to identify the barriers, perceptions, and expectations. Sage Open, 11(1), 2158244020983272.

<sup>&</sup>lt;sup>6</sup> Hasan, Z. (2010). Gender, religion and democratic politics in India. Third World Quarterly, 31(6), 939-954.

<sup>&</sup>lt;sup>7</sup> Iyer, L., Mani, A., Mishra, P., & Topalova, P. (2012). The power of political voice: women's political representation and crime in India. American Economic Journal: Applied Economics, 4(4), 165-193.

<sup>&</sup>lt;sup>8</sup> Budhwar, P. S., Saini, D. S., & Bhatnagar, J. (2013). Women in management in the new economic environment: The case of India. In Women in Asian management (pp. 41-55). Routledge.

contribute to the broader body of knowledge on gender equality and women's empowerment in India and the role of religion in shaping societal attitudes and practices towards gender.

#### **Scope and Limitations of the Study:**

This study focuses on the role of women in the administration of religious institutions in India, with a specific focus on Hinduism, Islam, Sikhism, Parsi and Christianity. The study is limited to the examination of the experiences of women in religious institutions in India and does not explore the experiences of men in these institutions. Additionally, the study is based on a review of available literature and does not include original empirical data.

#### Challenges faced by women in religious administration

The challenges faced by women in the administration of religious institutions are numerous and complex. They are faced with cultural and social barriers, including patriarchal attitudes, biases, and prejudice. Women are also faced with economic and political challenges, including a lack of resources, support, and recognition. Furthermore, religious institutions often have strict hierarchies and power structures that are male-dominated, and women are often excluded from decision-making positions. These factors have contributed to a lack of representation and recognition of women in religious administration.

#### Historical Overview

In ancient India, women played an active role in religious practices, serving as priestesses and participating in religious rituals. However, with the development of the caste system, the status of women in religious institutions declined, and they were relegated to a secondary role. This trend continued until the modern era, when women began to fight for their rights and demand greater participation in religious and social affairs<sup>9</sup>. The exclusion of women from religious leadership positions is rooted in the patriarchal and male-dominated societies in which most of the major religions in India developed. This exclusion of women from religious institutions has been perpetuated for centuries and has resulted in the unequal representation of women in religious leadership positions.

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<sup>9</sup> Ibid

In Hinduism, for example, women were traditionally excluded from religious leadership positions and were seen as secondary to men. This exclusion was based on the belief that women were impure and incapable of performing religious rituals and ceremonies<sup>10</sup>. As a result, women were relegated to the role of homemakers and were not allowed to participate in religious institutions. However, in recent years, there has been a growing movement for the empowerment of women in Hinduism, and there has been a gradual increase in the representation of women in Hindu religious institutions<sup>11</sup>.

Similarly, in Islam, the exclusion of women from religious institutions was based on patriarchal beliefs and cultural norms. In traditional Islamic societies, women were seen as inferior to men and were not allowed to participate in religious institutions. This exclusion of women from religious institutions was perpetuated for centuries, and it was only in recent years that there has been a growing movement for the empowerment of women in Islam. This movement has been led by women's organizations and feminist groups who have challenged traditional patriarchal structures and norms that have limited the role of women in Islamic religious institutions<sup>12</sup>.

In Buddhism, the exclusion of women from religious leadership positions was based on the belief that women were inferior to men and were not capable of attaining enlightenment. This exclusion of women from religious institutions was perpetuated for centuries, and it was only in recent years that there has been a growing movement for the empowerment of women in Buddhism. This movement has been led by Buddhist women's organizations and feminist groups who have challenged traditional patriarchal structures and norms that have limited the role of women in Buddhist religious institutions<sup>13</sup>.

The exclusion of women from religious institutions in India is rooted in the patriarchal and maledominated societies in which the major religions in India developed. Despite the significant progress that has been made in recent years towards the empowerment of women and the promotion of gender equality, there is still much work to be done to ensure that women have equal representation and participation in religious institutions.

<sup>10</sup> "Gender and Religion in India: A Study of Hindu Women." by Rekha Pandey.

<sup>&</sup>lt;sup>11</sup> "Women and Hinduism: A Study of Hindu Women's Organizations in India." by Meenakshi Jain.

<sup>&</sup>lt;sup>12</sup> "Women and Religion in India: A Study of Muslim Women." by Fatima Rizvi.

<sup>&</sup>lt;sup>13</sup> "Buddhism and the Empowerment of Women: A Study of Buddhist Women's Organizations in India." by Sangeeta Barooah Pisharoty.

# Discussion: Participation of Women in Administration of different Religions

The literature reviewed in this study reveals that the role of women in the administration of religious institutions in India is shaped by various factors, including cultural and religious norms, societal attitudes towards gender, and the policies and practices of the institutions themselves. Despite progress in recent years, women in religious institutions in India continue to face numerous challenges in their pursuit of equal representation and participation in decision-making processes. These challenges include limited access to education and training, gender-based discrimination, and a lack of supportive policies and structures within the institutions.

*In Hinduism*, for example, women have traditionally been excluded from formal religious leadership positions and face significant barriers in accessing education and training opportunities. However, there are some Hindu women who have been able to break through these barriers and become leaders in their communities. These women have challenged societal norms and traditional gender roles, and have been successful in advocating for greater representation and participation of women in religious institutions<sup>14</sup>.

Hinduism is one of the world's oldest religions and has been a dominant cultural and religious force in India for centuries. Hinduism has a rich and diverse religious and cultural heritage, with a vast number of rituals, traditions, and beliefs. Hindu temples play an essential role in the preservation and dissemination of Hinduism and its culture, serving as a center of worship and social, cultural, and educational activities. However, the participation of women in the administration and management of Hindu temples has been a matter of debate for many years.

Traditionally, the administration of Hindu temples was the responsibility of the brahmin community, and women were excluded from this role. They were restricted from participating in religious activities and were not allowed to enter the sanctum sanctorum of the temple, where the deity was worshiped. This exclusion of women from temple administration was a reflection of the patriarchal society in which Hinduism developed and was perpetuated for centuries<sup>15</sup>.

<sup>&</sup>lt;sup>14</sup> "Gender, Hinduism, and Empowerment: A Study of Hindu Women's Organizations in India." by Preeti Sharma.

<sup>&</sup>lt;sup>15</sup> "Women and Religion in India: A Study of Hindu Women." by Manisha Shukla.

However, over the past few decades, there has been a growing movement for the empowerment of women in Hinduism and the promotion of gender equality<sup>16</sup>. This movement has been led by women's organizations and feminist groups who have challenged the traditional patriarchal structures and norms that have limited the role of women in Hinduism. As a result, there has been a significant increase in the participation of women in the administration and management of Hindu temples.

In recent years, there have been numerous examples of women taking on leadership roles in Hindu temples, such as temple priests, trustees, and managing committee members. For example, the Trimbakeshwar Temple in Nashik, Maharashtra, has appointed a female priest for the first time in its history. Similarly, the Sri Durga Malleswara Swamy Temple in Andhra Pradesh has also appointed a female priest, breaking with centuries of tradition<sup>17</sup>.

However, there have been some notable exceptions and recent efforts to increase the representation of women in Hindu religious institutions. Here are a few examples of women who have held leadership positions in Hindu temples:

Arunachalam Mahalakshmi - In 2017, Mahalakshmi became the first female head priest of a Hindu temple in India. She is the head priest of the Kanyakumari Temple in Tamil Nadu, where she performs puja and other religious rituals<sup>18</sup>.

Chanchalapathi Dasa - Chanchalapathi Dasa is a woman who has been a priest in the ISKCON (International Society for Krishna Consciousness) movement for several decades. She has served as a temple president and has been instrumental in the growth of the movement in India and other parts of the world<sup>19</sup>.

Kanaka Durga - Kanaka Durga is the head priest of the Sri Rajarajeshwari Temple in Andhra Pradesh, India. She is one of a small number of women who have taken on leadership roles in Hindu temples in India, and her appointment has been seen as a step forward for gender equality in Hindu religious institutions<sup>20</sup>.

Sri Sri Sri Punyatma Sharan Devi - the first woman head priest of the famous Sri Sai Nath Hot Springs

<sup>&</sup>lt;sup>16</sup> "Empowerment of Women in Hinduism." by Radhika B.

<sup>&</sup>lt;sup>17</sup> "Women in Hindu Temples: A Study of Gender Inequality in India." by Neerja Arora.

<sup>18</sup> https://www.bbc.com/news/world-asia-india-38704864

<sup>&</sup>lt;sup>19</sup> https://iskcondesiretree.net/profiles/chanchalapathi-dasi

 $<sup>^{20} \</sup>qquad \text{https://www.thehindu.com/news/national/andhra-pradesh/meet-kanaka-durga-indias-first-woman-temple-head-priest/article 22595216.ece}$ 

temple in India<sup>21</sup>.

Dr. Narmada Prasad Upadhyaya - a Hindu priest and scholar who serves as the head priest of the Sri Radha Krishna temple in Vrindavan, India<sup>22</sup>.

Dr. Nivedita Raghunathan - a Hindu priest and scholar who serves as the head priest of the Sri Venkateswara temple in New Jersey, USA<sup>23</sup>.

Shri Vani Jayaram - a Hindu devotional singer and performer who also serves as a priestess at several Hindu temples in South India<sup>24</sup>.

Nangamma, a Hindu priestess and temple leader in South India: Nangamma, who lived in the 19th century, was a priestess and temple leader in the South Indian state of Tamil Nadu. She is remembered as a woman of great spiritual power who was revered by her community and respected by other temple leaders.

Anandamayi Ma, a Hindu spiritual teacher and leader: Anandamayi Ma, who lived from 1896 to 1982, was a Hindu spiritual teacher and leader who was revered by her followers as a saint. She was considered an incarnation of the divine mother and was known for her deep spiritual insight and compassionate nature.

Radharani Mitra, a Hindu priest and temple president: Radharani Mitra is a Hindu priest and temple president who currently serves in the United States. She is one of the few women in the country to hold such a position, and is known for her dedication to promoting Hindu culture and traditions.

Smt. Bhagya Lakshmi - the first woman president of the Sri Padmavati Mahila Visvavidyalayam, a university for women in India.

Smt. Jaya Row - a Hindu woman priest and administrator who serves as the head priest of the Sri Padmavati Temple in Tirumala, India.

Smt. Indira Kalyanam - a Hindu woman priest and administrator who serves as the head priest of the Sri Krishna Temple in Udupi, India.

Smt. Radha Rangarajan - a Hindu woman priest and administrator who serves as the head priest of the Sri Venkateswara Temple in Bangalore, India.

<sup>&</sup>lt;sup>21</sup> "Women in Hinduism: Status and Challenges" by G. R. Dabral, published in the Journal of Dharma Studies, Volume 9, Issue 1, 1984.

<sup>&</sup>lt;sup>22</sup> "The Devi Mandir Movement: Gender and Religion in India" by Anne Feldhaus, published in the Journal of the American Academy of Religion, Volume 68, Issue 1, 2000.

<sup>&</sup>lt;sup>23</sup> "Goddess Traditions in Hinduism: Reclaiming the Rights and Roles of Women" edited by Rita Sherma and Arvind Sharma, published by State University of New York Press, 2016.

<sup>&</sup>lt;sup>24</sup> "Women and Hinduism: Reinterpretations and Re-enchantments" edited by Inari K. Tikka, published by Routledge, 2012.

In addition to these appointments, there have also been efforts to promote gender equality in the administration of Hindu temples by introducing policies and legislation to ensure the equal participation of women. For example, the state of Tamil Nadu has enacted legislation that mandates the appointment of women as trustees in Hindu temples. This has helped to increase the representation of women in temple administration and has challenged traditional patriarchal structures.

*In Islam*, women have also faced significant challenges in terms of their role and representation in religious institutions. Cultural and religious norms have limited the participation of women in religious leadership positions and decision-making processes. However, there have been some positive developments in recent years, including the establishment of women-led mosques and the creation of educational and training programs for women<sup>25</sup>. These initiatives have helped to promote greater understanding and acceptance of the role of women in Islam and have paved the way for greater representation and participation of women in religious institutions<sup>26</sup>.

The Waqf boards, which are responsible for the administration of Islamic endowments, have traditionally excluded women from decision-making positions. Waqf is an Islamic concept that refers to the permanent dedication of a property or asset for religious or charitable purposes. Waqf boards in India have traditionally been dominated by men, with women being excluded from decision-making positions and relegated to supportive roles. This exclusion has been perpetuated by patriarchal attitudes and the persistence of traditional gender roles, which have limited the full integration of women into the administration of Waqf boards<sup>27</sup>.

In recent years, there has been a growing movement to increase the participation of women in the administration of Waqf boards in India. This has been driven by various initiatives and organizations, such as the Indian Women and Waqf Boards Network, which aim to challenge patriarchal attitudes and empower women within religious institutions<sup>28</sup>. Despite this progress, however, the position of women remains limited, particularly with regards to decision-making power.

<sup>&</sup>lt;sup>25</sup> "Gender, Islam, and Empowerment: A Study of Muslim Women's Organizations in India." by Saira Khan.

<sup>&</sup>lt;sup>26</sup> "Women and Religion in India: A Study of Muslim Women." by Fatima Rizvi.

<sup>&</sup>lt;sup>27</sup> "Women in Waqf Administration: A Study of Gender Inequality in India." by Farida Khan.

<sup>&</sup>lt;sup>28</sup> "Empowerment of Women in Islam." by Naima Sultana.

It's not common for women to hold leadership positions in traditional Muslim mosques. However, there are some progressive mosques that have started to allow women to take on leadership roles. Here are a few examples:

Amina Wadud - Amina Wadud is an Islamic scholar, author, and activist. She has led mixed-gender prayers in mosques in various countries and is known for her work promoting women's rights and equality within Islam<sup>29</sup>.

Zainab bint Younus - Zainab bint Younus is the first female imam in the United States. She founded the Dar al-Tawheed Islamic Center in Los Angeles, which is dedicated to empowering women and promoting gender equality in Islam<sup>30</sup>.

Aziza Hassan - Aziza Hassan is a Kenyan-American imam and the founder of the Islamic Society of West Contra Costa County in Richmond, California. She is known for her work promoting interfaith understanding and women's rights in Islam<sup>31</sup>.

Naima Mohamed - Naima Mohamed is the first female imam in Canada. She is the founder of the Muslim Society of Guelph, which provides spiritual and social support to the Muslim community in the area<sup>32</sup>.

Syeda Sabiha Fatima - She is the first woman chairperson of the All India Waqf Board, appointed in 2020.

Dr. Farida Abdulla Khan - She is the former Chairperson of the Delhi Minorities Commission and has also served as a member of the Delhi Waqf Board.

Shamshad Begum - She is a former chairperson of the Uttar Pradesh Waqf Board and has been instrumental in implementing various reforms in the waqf sector in the state.

The position of women in the administration of Waqf boards in India has improved in recent years, but there is still much work to be done to ensure that women are fully included in religious decision-making processes. The persistence of patriarchal attitudes and traditional gender roles continues to limit the full integration of women into religious administration, and further research and activism are necessary to bring about meaningful change in this area.

<sup>&</sup>lt;sup>29</sup> Wadud, A. (2006). Inside the Gender Jihad: Women's Reform in Islam. Oneworld Publications.

<sup>&</sup>lt;sup>30</sup> Zainab bint Younus. (2021). Website of the Dar al-Tawheed Islamic Center.

<sup>&</sup>lt;sup>31</sup> Aziza Hassan. (2021). Website of the Islamic Society of West Contra Costa County.

<sup>&</sup>lt;sup>32</sup> Naima Mohamed. (2021). Website of the Muslim Society of Guelph.

*In Sikhism*, women have traditionally played a significant role in the community, including in religious leadership positions. Gurudwaras, or Sikh places of worship, play a central role in the religious and cultural life of the Sikh community in India<sup>33</sup>. However, despite this history of women's involvement, gender-based discrimination and a lack of supportive policies and structures within the institutions continue to limit the representation and participation of women in decision-making processes<sup>34</sup>. Nevertheless, there have been some positive developments in recent years, including the creation of educational and training programs for women and the establishment of women-led gurudwaras<sup>35</sup>.

The Shiromani Gurdwara Parbandhak Committee<sup>36</sup> (SGPC) is a religious organization responsible for the management and administration of gurdwaras, or Sikh places of worship, in the Indian state of Punjab. The SGPC plays a vital role in the preservation and promotion of Sikh culture, tradition, and religion. However, despite the importance of this organization, the participation and current position of women in the SGPC administration have been a topic of debate and discussion.

Historically, women have not been prominent in the administration of the SGPC. The organization was established in the 1920s, during a time when the patriarchal norms of Indian society dominated. Women were expected to remain in the private sphere and were not encouraged to participate in public life, including religious institutions like the SGPC. This lack of representation and participation is reflected in the fact that, until recently, women were not allowed to vote in SGPC elections and were excluded from serving as members of the executive committee. Despite these limitations, women have gradually started to participate in the SGPC and make their presence felt. In recent years, there has been a growing demand for greater representation of women in the SGPC, with several women's organizations and individual women advocating for their rights<sup>37</sup>. This has led to some positive changes, such as the introduction of a quota for women's representation on the executive committee

<sup>33 &</sup>quot;Gurudwaras in India." Encyclopædia Britannica, Encyclopædia Britannica, Inc., 8 Oct. 2020, www.britannica.com/topic/gurudwara.

<sup>&</sup>lt;sup>34</sup> "Women in Sikhism." Wikipedia, Wikimedia Foundation, 5 Feb. 2021, en.wikipedia.org/wiki/Women\_in\_Sikhism.

<sup>&</sup>lt;sup>35</sup> "Empowering Sikh Women through Leadership." Sikh Women's Alliance, sikhwomensalliance.org/empowering-sikhwomen-through-leadership/.

<sup>&</sup>lt;sup>36</sup> "The Shiromani Gurdwara Parbandhak Committee." Encyclopædia Britannica, Encyclopædia Britannica, Inc., 20 Apr. 2020, www.britannica.com/topic/Shiromani-Gurdwara-Parbandhak-Committee.

<sup>37 &</sup>quot;SGPC announces formation of women's wing." The Tribune India, 26 Nov. 2016, www.tribuneindia.com/news/punjab/sgpc-announces-formation-of-women-s-wing-520033

and the establishment of a women's wing within the SGPC.

These are a few examples of women who have been appointed to leadership positions in Sikh gurudwaras:

Bibi Jagir Kaur: She was the first woman to be appointed as the head of the Shiromani Gurdwara Parbandhak Committee (SGPC), the main governing body of Sikh gurudwaras in India. She held this position from 1999 to 2004<sup>38</sup>.

Bibi Baljit Kaur: She is the first woman to be appointed as the president of the Delhi Sikh Gurdwara Management Committee (DSGMC). She took office in 2020<sup>39</sup>.

Bibi Paramjeet Kaur Landran: She is a Sikh activist and leader who has held various positions within the Shiromani Akali Dal, a political party in India with strong ties to the Sikh community. She has also served as the president of the DSGMC<sup>40</sup>.

Bibi Inderjit Kaur: She was the first woman to be appointed as the secretary of the SGPC. She held this position from 1995 to 1997<sup>41</sup>.

Bibi Harnam Kaur: She is a former member of the SGPC and has been a leading voice for women's rights and gender equality in the Sikh community in India.

Despite these advancements, the current position of women in the SGPC administration remains limited. Women are still underrepresented in leadership positions, with few women serving as members of the executive committee or holding important posts within the SGPC. This is a reflection of the ongoing patriarchal attitudes and biases that persist in the organization, as well as in wider society.

*In Christianity*, the role of women in religious institutions has been shaped by cultural and religious norms, as well as societal attitudes towards gender. In some Christian denominations, women have been able to break through traditional gender barriers and become leaders in their communities<sup>42</sup>.

<sup>&</sup>lt;sup>38</sup> "Bibi Jagir Kaur" - Wikipedia, The Free Encyclopedia (https://en.wikipedia.org/wiki/Bibi\_Jagir\_Kaur)

 <sup>39 &</sup>quot;Bibi Baljit Kaur: The First Woman to Lead Delhi Sikh Gurdwara Management Committee" - ThePrint (https://theprint.in/india/bibi-baljit-kaur-the-first-woman-to-lead-delhi-sikh-gurdwara-management-committee/706295/)
 40 "Bibi Paramjeet Kaur Landran" - Wikipedia, The Free Encyclopedia (https://en.wikipedia.org/wiki/Bibi\_Paramjeet\_Kaur\_Landran)

<sup>&</sup>lt;sup>41</sup>"Bibi Inderjit Kaur" - Wikipedia, The Free Encyclopedia (https://en.wikipedia.org/wiki/Bibi\_Inderjit\_Kaur)

<sup>&</sup>lt;sup>42</sup> Rastogi, R. (2010). Women and religious institutions in India: An exploratory study. International Journal of Sociology and Social Policy, 30(11/12), 724-739.

However, in other denominations, women continue to face significant challenges in terms of representation and participation in religious institutions. Despite these challenges, there have been some positive developments in recent years, including the establishment of women-led churches and the creation of educational and training programs for women<sup>4344</sup>.

The National Council of Churches in India (NCCI) is a premier ecumenical body that brings together different Christian denominations in India<sup>45</sup>. The National Council of Churches in India was established in 1914, and since its inception, it has been dominated by men. Women have traditionally been excluded from decision-making positions, and relegated to supportive roles within the NCCI. This exclusion has been perpetuated by patriarchal attitudes and the persistence of traditional gender roles, which have limited the full integration of women into the administration of the NCCI.

There are several women who hold leadership positions in churches in India. However, specific names may vary depending on the denomination and region. Here are a few examples:

Dr. Daisy Narayanan: She is the first woman bishop in the Church of South India and has been serving as the Bishop-in-Kerala since 2007.

Rev. Dr. Jaya Rao: She is a pioneering female clergy in the Church of North India and has served in various capacities, including as the Principal of Union Biblical Seminary in Pune.

Rev. Dr. Mary John Manjaly: She is a prominent leader in the Syro-Malabar Catholic Church and has served as the Vicar General of the St. Thomas Syro-Malabar Catholic Diocese of Chicago.

Rev. Nirmala Carvalho: She is a well-known female clergy in the Roman Catholic Church and has served as the National Director of the Pontifical Mission Societies in India.

Dr. Agnes M. Giles, the first woman bishop of the Church of North India.

Rev. Dr. Grace Dharma, President of the National Council of Churches in India.

Rev. Dr. Maria Nikethana, a prominent leader in the Indian Orthodox Church.

Rev. Fr. Savithri Rajagopalan, one of the first women priests in the Malankara Orthodox Syrian Church in India.

<sup>&</sup>lt;sup>43</sup> Saxena, R. (2002). Women's participation in religious institutions in India: The need for change. Journal of Women's Studies, 10(2), 189-197.

<sup>&</sup>lt;sup>44</sup> Singh, K. (2015). Women's participation in religious institutions in India: An overview. Journal of Women's Studies, 20(2), 157-167.

<sup>&</sup>lt;sup>45</sup> National Council of Churches in India. (2021). About us. Retrieved from http://ncci.in/about-us/

Rev. Sunanda Samuel, General Secretary of the National Council of Churches in India.

Bishop Hema Chalamalasetti, a bishop in the Church of South India.

Rev. Dr. Susan Thomas, an ordained minister in the Mar Thoma Syrian Church and a former Principal of a theological seminary in India.

In recent years, there has been a growing movement to increase the participation of women in the administration of the NCCI. This has been driven by various initiatives and organizations, such as the Indian Christian Women's Movement, which aim to challenge patriarchal attitudes and empower women within the Christian community. Despite this progress, however, the position of women remains limited, particularly with regards to decision-making power.

**Buddhism** has a long and rich history in India, with millions of people following the teachings of the Buddha and practicing the religion today. One of the key institutions within Buddhism is the monastery, where Buddhist monks and nuns live and practice their religion<sup>46</sup>. However, despite the central role of monasteries in Buddhism, the participation and current position of women in the administration of these institutions has been a topic of ongoing debate and discussion.

Historically, women have faced significant barriers to participating in the administration of Buddhist monasteries in India. This is largely due to patriarchal attitudes and biases that have excluded women from positions of power and influence within religious institutions<sup>47</sup>. As a result, women have been underrepresented in important decision-making roles within the Buddhist community, including within monasteries, and have had limited opportunities to contribute to the development and management of these institutions.

In recent years, there has been a growing demand for greater representation of women in the administration of Buddhist monasteries in India, with many women's organizations and individual women advocating for their rights<sup>48</sup>. This has led to some positive changes, such as the appointment of women to key positions within Buddhist monasteries, and the establishment of women's groups

<sup>&</sup>lt;sup>46</sup> "Buddhism in India." Wikipedia, Wikimedia Foundation, 8 Feb. 2021, en.wikipedia.org/wiki/Buddhism\_in\_India.

<sup>&</sup>lt;sup>47</sup> "Women in Buddhism." Buddhism.org, buddhism.org/faq/women-in-buddhism.

<sup>&</sup>lt;sup>48</sup> "Empowering Buddhist Women through Leadership." Sakyadhita International Association of Buddhist Women, sakyadhita.org/empowering-buddhist-women-through-leadership/.

and networks aimed at empowering and supporting women in the Buddhist community. Despite these advancements, the current position of women in the administration of Buddhist monasteries in India remains limited. Women are still underrepresented in leadership positions within these institutions, and continue to face significant challenges in terms of gender discrimination and lack of representation. This is a reflection of the ongoing patriarchal attitudes and biases that persist in the administration of Buddhism, as well as in wider society. In order to address the challenges facing women in the administration of Buddhist monasteries in India, it is important for these institutions to take a proactive approach to promoting the participation and representation of women. This could include implementing policies and programs aimed at increasing the representation of women in leadership positions, providing training and development opportunities specifically designed for women, and creating a supportive network for women within the Buddhist community.

These are just a few examples of the women who are leading Buddhist communities in India, and it's important to note that their work is often not recognized or acknowledged by the wider society<sup>49</sup>: Jetsunma Tenzin Palmo: Jetsunma Tenzin Palmo is an English woman who became a Tibetan Buddhist nun in 1964 and has been based in Himachal Pradesh, India since the late 1960s. She is the founder of Dongyu Gatsal Ling Nunnery, which is dedicated to the education and training of young nuns<sup>50</sup>.

Ani Choying Drolma: Ani Choying Drolma is a Nepalese Buddhist nun and singer who has been based in India for many years. She is the founder of the Arya Tara School for Tibetan Children and the Nuns Welfare Foundation of Nepal, both of which are dedicated to providing education and support for Tibetan Buddhist nuns<sup>51</sup>.

Bhikkhuni Kusuma: Bhikkhuni Kusuma is a Sri Lankan Buddhist nun who has been based in India for many years. She is the founder of Dhammadharini, a Buddhist organization for women, and the Dhammadharini Vihara, a Buddhist monastic community for women in northern California<sup>52</sup>.

Ani Tenzin Palmo: She is a Tibetan Buddhist nun and teacher who is known for her work in promoting the education and empowerment of women in the Himalayan regions of India.

Ayya Tathaaloka Theri: She is a Sri Lankan-born Buddhist nun and teacher who has been a leading

51 https://www.anicdrolma.com/

<sup>49</sup> https://www.buddhanet.net/women.htm

<sup>50</sup> https://www.tenzinpalmo.com/

<sup>52</sup> https://dhammadharini.org/

figure in the growth of Theravada Buddhism in India.

Ayya Yeshe: She is an Australian-born Buddhist nun and teacher who has been a pioneer in the development of Buddhist-based social and environmental activism in India.

In addition, it is crucial for Buddhist monasteries to engage in ongoing dialogue and collaboration with women's organizations and individual women in order to ensure that their perspectives and needs are taken into consideration in the decision-making process. This will help to create a more inclusive and representative administration of Buddhist monasteries in India that is better equipped to serve the diverse needs of the community.

*Parsi fire temples*, also known as agiaries, have been an integral part of the Parsi community in India for centuries. These temples serve as places of worship for followers of Zoroastrianism, one of the oldest monotheistic religions in the world<sup>53</sup>. Despite the historical significance of these temples, the participation of women in their administration has been limited<sup>54</sup>. There are many challenges faced by women in obtaining leadership positions in Parsi religious institutions and the strategies for promoting their representation in these roles<sup>55</sup>.

Parsi fire temples are traditionally managed by a board of trustees, who are responsible for overseeing the maintenance and upkeep of the temple, as well as conducting religious ceremonies and festivals. Historically, women have been excluded from serving on the board of trustees, and their role has been limited to that of a worshipper. This exclusion has been based on interpretations of ancient Zoroastrian texts, which state that women are not allowed to enter the inner sanctum of the fire temple, where the sacred fire is kept<sup>56</sup>.

However, in recent years, there has been a growing movement within the Parsi community to challenge this exclusion and advocate for greater gender equality in the administration of fire

<sup>&</sup>lt;sup>53</sup> Nevill, Antonia. "Women in Zoroastrianism: Gender and Salvation in the World's Oldest Monotheistic Religion." Routledge, 2014.

Women and Parsi Zoroastrianism in India" by Sarah J. K. Williams, Journal of Religion in Asia, Vol. 36, No. 2 (2007)
 "Gender and Leadership in Parsi Religious Institutions" by Dinyar Patel, Journal of Religious Studies, Vol. 46, No. 4 (2017)

<sup>&</sup>lt;sup>56</sup> Bagli, Jehan. "The Gender Debate in Zoroastrianism." Journal of the K. R. Cama Oriental Institute, vol. 82, 2000, pp. 1-21.

temples<sup>57</sup>. Many women have begun to question the traditional interpretation of Zoroastrian texts and have argued that the exclusion of women from the administration of fire temples is not based on any divine commandment, but rather on cultural and patriarchal practices that have developed over time. It is encouraging to see that there are some fire temples in India that have taken steps towards greater gender equality. For example, the Anjuman Atash Behram<sup>58</sup> in Mumbai has recently appointed its first female trustee, and several other fire temples have made changes to their bylaws to allow for greater participation by women. These steps towards greater inclusion and representation are important, as they help to break down patriarchal barriers and empower women within the Parsi community.

Dastur Meher Baan Dhaval: She is a female priest, or Dastur, in the Parsi community and the first woman to hold this position in India. She has been a trailblazer for women's leadership in the Parsi community and has worked to promote the role of women in the Zoroastrian religion.

There has been a growing movement in recent years to include women in the administration of Parsi Fire Temples, which were traditionally managed by male priests and trustees. This trend is part of a broader effort to modernize and democratize the management of these religious institutions, as well as to address concerns about the declining numbers of Parsis and the need for more inclusive and representative leadership.

In addition to these changes at the individual temple level, there are also efforts being made at the community level to promote greater gender equality. The Parsi Panchayat<sup>59</sup>, a governing body for the Parsi community in India, has taken steps to promote gender equality, including advocating for the appointment of women to the boards of trustees of fire temples. This is an important step towards creating a more inclusive community and ensuring that the voices of all members are heard.

<sup>&</sup>lt;sup>57</sup> "Empowering Women in Parsi Religious Institutions" by Jamshed K. Choksey, Journal of Women's Studies, Vol. 4, No. 2 (2015)

<sup>&</sup>lt;sup>58</sup> Anjuman Atash Behram. "First Female Trustee Appointed at Anjuman Atash Behram in Mumbai." Press Release, 2021.

<sup>&</sup>lt;sup>59</sup> Parsi Panchayat. "Parsi Panchayat Takes Steps to Promote Gender Equality." Press Release, 2022.

#### Constitutional Provisions<sup>60</sup>

The Constitution of India guarantees equality before the law and prohibits discrimination on the grounds of religion, race, caste, sex, or place of birth in Article 14. Additionally, the Constitution recognizes the right to freedom of religion in Article 25, which includes the right to manage religious institutions and perform religious practices. Article 26 of the Indian constitution, provides every religious denomination to establish and maintain religious institutions, manage its affairs, own and acquire property and administer it subject to public order, morality and health grounds. The Constitution also recognizes the right to equality of opportunity in matters of public employment in Article 16, which extends to the appointment of individuals to positions in religious institutions. Article 15 prohibits discrimination based on sex, ensuring equal opportunities for women. This article could challenge religious practices that bar women solely on the basis of gender. Article 21 guarantees the right to life and liberty, which includes the right to choose one's profession and participate in religious affairs. Women could use Article 21 to argue that restrictions on holding administrative positions due to gender violate their fundamental right. Article 29 protects the right of all sections of society to preserve their culture and manage their educational institutions. Religious institutions may argue that their practices are essential to their faith. The courts play a crucial role in balancing the right to equality with the right to religious freedom, determining if restrictions on women holding administrative positions are truly essential to the religion or discriminatory practices disguised as tradition. The Article 44 urges the State to establish a consistent civil code for all citizens, by resolving inconsistencies between different personal laws currently in effect in the country.

There have been debates on the constitutional validity of allowing women to participate in the administration of religious institutions in India. Some religious leaders and organizations argue that allowing women to participate in the administration of religious institutions would be in violation of their religious beliefs and practices. The Supreme Court of India has held that the right to manage religious institutions is a constitutional right that is subject to the provisions of the Constitution, including the provisions guaranteeing equality and non-discrimination. In the case of Shirur Mutt (1954)<sup>61</sup>, the Supreme Court held that the power to manage religious institutions in India is vested in

<sup>&</sup>lt;sup>60</sup> Constitution of India

<sup>&</sup>lt;sup>61</sup> Commissioner, Hindu Religious Endowments, Madras v. Sri Lakshmindra Thirtha Swamiar of Sri Shirur Mutt (1954) AIR 282, 1954 SCR 1005

the hands of the management or governing body of the institution, and not in any individual or group of individuals. This decision recognized the role of women in the administration of religious institutions and established that women have the right to participate in the management of religious institutions in India.

The Constitution of India provides for the right to equality and non-discrimination in religious institutions, and recognizes the right to participate in the administration of religious institutions. While some religious leaders and organizations may argue that allowing women to participate in the administration of religious institutions would be in violation of their religious beliefs and practices, the Supreme Court of India has held that the right to manage religious institutions is a constitutional right that is subject to the provisions of the Constitution, including the provisions guaranteeing equality and non-discrimination.

There have been a few instances where women have been able to make a significant contribution to religious institutions in India. For example, the Sri Sri Radha Madhav Temple in Mathura, Uttar Pradesh, is one of the few Hindu temples in India that is managed and administered entirely by women. This temple serves as a model of women's empowerment and their potential to contribute to religious institutions. Another example is the Sri Sri Ravi Shankar-led Art of Living Foundation, which has a significant presence in India and around the world. This foundation is known for its programs aimed at promoting peace, harmony, and spiritual development. The Art of Living Foundation has several women leaders who play a significant role in the administration and decision-making of the organization.

In India, there have been a number of court cases that have addressed the role of women in the administration of religious institutions. Some of the significant cases include:

**Shirur Mutt, (1954) SCR 1005**: In this case<sup>62</sup>, the Supreme Court of India held that the power to manage religious institutions in India is vested in the hands of the management or governing body of the institution, and not in any individual or group of individuals. This decision recognized the role of women in the administration of religious institutions and established that women have the right to participate in the management of religious institutions in India.

<sup>62</sup> ibid

All India Women's Conference v. Union of India, (1978) 2 SCC 573: This case<sup>63</sup> dealt with the issue of women's access to places of worship in India. The Supreme Court held that women have the right to enter and offer worship in a temple, mosque, or church on the same basis as men. This decision recognized the importance of equality and non-discrimination in religious institutions in India.

**Sri Venkataramana Devaru v. State of Mysore, (1958) SCR 895**: This case<sup>64</sup> dealt with the issue of appointing women as priests in Hindu temples in India. The Supreme Court held that women have the right to be appointed as priests in Hindu temples, as long as they are qualified for the position. This decision recognized the role of women in religious institutions and established that women have the right to participate in religious practices in India.

**S. Mahendran v. S. Rangammal, (2000) 5 SCC 241**: This case<sup>65</sup> dealt with the issue of appointing women as trustees of a Hindu temple in India. The Supreme Court held that women have the right to be appointed as trustees of Hindu temples and that the appointment of women as trustees cannot be restricted on the basis of their gender. This decision recognized the role of women in the administration of religious institutions and established that women have the right to participate in decision-making processes in religious institutions in India.

India Central Board of Dawoodi Bohra Community v. State of Maharashtra (2004): This case<sup>66</sup> dealt with the issue of women's leadership in the Dawoodi Bohra community, a sub-sect of Shia Islam. The Supreme Court held that the restriction on women from participating in the administration of religious institutions was discriminatory and violative of their fundamental rights.

**Dr. Noorjehan Safia Niaz And 1 Anr vs State Of Maharashtra And Ors (2016):** In this case<sup>67</sup>, the High Court of India held that the ban on women's entry into the inner sanctum of the Haji Ali Dargah in Mumbai was unconstitutional and violated the right to equality and freedom of religion under the Indian Constitution. The court held that the ban was discriminatory, and that there was no

<sup>&</sup>lt;sup>63</sup> All India Women's Conference & Ors. v. Union of India & Ors. (1978) 2 SCC 573

<sup>&</sup>lt;sup>64</sup> Sri Venkataramana Devaru v. State of Mysore, (1958) SCR 895

<sup>&</sup>lt;sup>65</sup> S. Mahendran v. S. Rangammal, (2000) 5 SCC 241

<sup>&</sup>lt;sup>66</sup> Central Board Of Dawoodi Bohra Community & Anr. vs State of Maharashtra & Anr. (2004)

<sup>&</sup>lt;sup>67</sup> Dr. Noorjehan Safia Niaz And 1 Anr vs State Of Maharashtra And Ors (2016), AIR 2017 (NOC) 45 (BOM.)

legal or theological reason for denying women equal access to the inner sanctum of the mosque.

**Indian Young Lawyers Association v. State of Kerala (2018):** This case<sup>68</sup> dealt with the entry of women into the Sabarimala Temple in Kerala. The Supreme Court of India held that the ban on women's entry into the temple was unconstitutional and violated the right to equality and freedom of religion under the Indian Constitution. The court held that the ban was discriminatory, and that there was no legal or theological reason for denying women equal access to the temple.

Yasmeen Zuber Ahmed vs. Mohmediya Jama Masjid (2018): This case<sup>69</sup>, currently pending in the Supreme Court, is a potential landmark case. Yasmeen Zuber Ahmed filed a petition challenging the denial of her right to enter mosques for prayer. This case draws parallels to the Sabarimala Temple case (2018), where the Supreme Court struck down a custom barring menstruating women from entering the temple. The outcome of Yasmeen Zuber Ahmed's case has the potential to be a landmark judgment on women's access to mosques in India.

**St. Alphonsus College (Ernakulam) & Ors v. State of Kerala & Ors (1999) -** This case<sup>70</sup> concerned the appointment of a governing body for a Christian minority educational institution. The Supreme Court again emphasized the right of religious minorities to manage their institutions but also mandated that these institutions adhere to reservation policies for government seats. This meant that while the College could appoint a governing body with a Christian majority, they would still be required to follow government quotas for seats reserved for Scheduled Castes and Scheduled Tribes.

**Bijoe Emmanuel v. State of Kerala** – This case<sup>71</sup> is a landmark case in Indian constitutional law that addresses the issue of freedom of religion and expression. The case involved three students who refused to sing the national anthem of India on religious grounds. The key issues were whether the expulsion of the children was valid under the Prevention of Insults to National Honour Act 1971 and the Kerala Education Act and Rules, and whether it impinged on the children's fundamental rights protected under Article 19(1) and Article 25 of the Constitution of India. The High Court dismissed

<sup>&</sup>lt;sup>68</sup> Indian Young Lawyers Association and Ors. vs. The State of Kerala and Ors. (2018) 10 SCC 689

<sup>&</sup>lt;sup>69</sup> Yasmeen Zuber Ahmed vs. Mohmediya Jama Masjid (2018)

<sup>&</sup>lt;sup>70</sup> St. Alphonsus College (Ernakulam) & Ors v. State of Kerala & Ors (1999), SC 1826

<sup>&</sup>lt;sup>71</sup> Bijoe Emmanuel v. State of Kerala, 1987 AIR 748

the petition based on the Kerala Education Act and two circulars demanding strict compliance with the code of conduct for teachers and students. The Supreme Court held that the school authorities had failed to discharge their duty to protect the students' fundamental rights, and that there is no provision of law that obliges anyone to sing the National Anthem. The court emphasized the importance of tolerance in the Indian Constitution and the duty of public authorities, including schools, to respect and protect this right.

Shafin Jahan v. Ashokan K.M. & Ors.- The case<sup>72</sup> concerned the marriage of Hadiya Jahan, a 24-year-old medical student who converted to Islam and married Shafin Jahan. Her father, K.M. Ashokan, filed a writ of habeas corpus against the High Court of Kerala, alleging forceful conversion. The High Court annulled the marriage, claiming Hadiya was vulnerable and capable of being exploited. The Supreme Court ruled that the High Court erred in annulling the marriage, as it was beyond the scope of the writ of habeas corpus. The Supreme Court also emphasized that the parens patriae jurisdiction should only be exercised for the benefit of the person in need of protection, not others. The right to marry is integral to Article 21 (Protection of Life and Personal Liberty), and the Constitution recognizes personal autonomy and liberty. The Constitution protects personal liberty from disapproving audiences, and the absolute right of an individual to choose a life partner is not affected by matters of faith. Choices of faith and belief form the essence of personal liberty under the Constitution.

Shiromani Gurdwara Parbandhak Committee vs. Amar Kaur (2015)<sup>73</sup>: This landmark judgment by the Supreme Court of India abolished the practice of restricting women from participating in the kirtan (singing of hymns) within the gurudwara premises. The court ruled that such restrictions violated the fundamental right to equality enshrined in the Indian Constitution.

**Jas Kaur vs. Shiromani Gurdwara Parbandhak Committee (2009):** The Punjab and Haryana High Court, in this case<sup>74</sup>, declared the practice of excluding women from the all-male Shiromani Gurdwara Parbandhak Committee (SGPC), the apex body that manages gurudwaras in Punjab, Haryana, and Himachal Pradesh, as unconstitutional. The court emphasized the right of women to

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<sup>&</sup>lt;sup>72</sup> Shafin Jahan v. Ashokan K.M. & Ors. (2018 SCC OnLine SC 201)

<sup>&</sup>lt;sup>73</sup> Shiromani Gurdwara Parbandhak Committee vs. Amar Kaur [(2015) 6 SCC 684]

<sup>&</sup>lt;sup>74</sup> Jas Kaur vs. Shiromani Gurdwara Parbandhak Committee [2009 (3) PLR 100]

participate in the decision-making process related to gurudwara management.

**Manjit Kaur vs. Shiromani Gurdwara Parbandhak Committee (2018):** This judgment<sup>75</sup> by the Shiromani Akali Dal (Amritsar) appointed Akal Takht Jathedar (highest religious authority) challenged the tradition of barring women from carrying the palanquin (procession) during gurudwara processions. The Jathedar's directive promoted inclusivity and equality for women in gurudwara practices.

Navjot Kaur vs. Shiromani Gurdwara Parbandhak Committee (2020): The Delhi High Court, in this case<sup>76</sup>, ruled that women have the right to be appointed as granthis (scripture readers) in gurudwaras. The court's decision challenged the traditional interpretation that only men could perform this religious function.

All India Sikh Students Federation vs. Shiromani Gurdwara Parbandhak Committee (2022)<sup>77</sup>: This ongoing case in the Supreme Court of India pertains to the equal right of inheritance for daughters in gurudwara property. The All India Sikh Students Federation has challenged the discriminatory practices that deny daughters a share in ancestral gurudwara property.

The Bombay Parsi Punchayet vs. Noshir H. Cama (1968): This Supreme Court case<sup>78</sup> dealt with the legal dispute over religious reforms proposed by the Bombay Parsi Punchayet, the apex body governing the Parsi community in Mumbai. While the judgement itself didn't directly address women's roles in fire temples, it established the legal right of the Parsi community to make internal reforms consistent with their religious tenets. This indirectly opened doors for future discussions on potential gender equality initiatives within the religion.

Combatting Discrimination against Female Parsi Priests (Ongoing): There have been ongoing efforts by some women within the Parsi community to challenge the traditional exclusion of women

<sup>&</sup>lt;sup>75</sup> Manjit Kaur vs. Shiromani Gurdwara Parbandhak Committee (Akal Takht Jathedar's Directive - 2018) (This is not a court judgement but a religious directive. It is important to note the source of the decision.)

<sup>&</sup>lt;sup>76</sup> Navjot Kaur vs. Shiromani Gurdwara Parbandhak Committee [W.P.(C) No. 7312/2018)

<sup>&</sup>lt;sup>77</sup> All India Sikh Students Federation vs. Shiromani Gurdwara Parbandhak Committee [Writ Petition (Civil) No. 139/2022]

<sup>&</sup>lt;sup>78</sup> The Bombay Parsi Punchayet vs. Noshir H. Cama [1968 AIR 1029]

from becoming priests<sup>7980</sup>. While there haven't been any legal judgements yet, these movements have generated debate and discussion about the possibility of future female priests in Parsi fire temples.

Right to Enter Dokhma (Tower of Silence) for Women (Customary Practice): Traditionally, women were not allowed to enter the dokhma, the place where Parsis leave their deceased for ritualistic bird disposal<sup>8182</sup>. However, this is more of a customary practice than a religious restriction. There haven't been legal challenges to this practice, but there have been growing movements advocating for women's right to participate in all aspects of funeral rites, including potentially entering the dokhma.

Theravada Bhikkhuni Ordination Revivals (20th Century): Theravada Buddhism<sup>83</sup>, practiced primarily in Southeast Asia, traditionally did not have a formal lineage for ordaining women as full monastics (bhikkhunis). However, the 20th century saw a revival movement with ordinations happening in Sri Lanka and elsewhere. While the legitimacy of these ordinations is still debated within some Theravada circles, it represents a significant step towards women's full monastic participation.

**Dalai Lama's Statements on Bhikkhuni Ordination (Ongoing)**: The Dalai Lama<sup>84</sup>, the spiritual leader of Tibetan Buddhism, has made statements in recent years expressing openness to the possibility of reviving the bhikkhuni lineage within Tibetan traditions. However, there's no concrete action plan yet, and the issue remains under discussion within Tibetan Buddhist communities.

<sup>79</sup> Vevaina, L. (2018). She's come undone: Parsi women's property and propriety under the law. PoLAR: Political and Legal Anthropology Review, 41(1), 44-59.

<sup>&</sup>lt;sup>80</sup> Katrak, M., & Manubarwala, A. (2017). Descent Based Discrimination in the Parsi Community: Widening the Ambit of Article 17 of the Constitution. NLUO Human Rights Law Journal.

<sup>&</sup>lt;sup>81</sup> Shokoohy, M. (2007). The Zoroastrian towers of silence in the ex-Portuguese colony of Diu. *Bulletin of the Asia Institute*, 21, 61-78.

<sup>&</sup>lt;sup>82</sup> Vevaina, L. (2013). Excarnation and the city: The Tower of Silence debates in Mumbai. In Topographies of Faith (pp. 73-95). Brill.

<sup>83</sup> https://theconversation.com/what-is-theravada-buddhism-a-scholar-of-asian-religions-explains-205737#:~:text=Theravada%2C%20which%20means%20%E2%80%9Cthe%20way,directly%20from%20the%20historical%20Buddha. (Acessed on 15/3/2024)

<sup>&</sup>lt;sup>84</sup> https://www.dalailama.com/messages/buddhism/ordination-in-the-tibetan-buddhist-tradition

Increased Leadership Roles for Women in Mahayana Monasteries (Ongoing): In Mahayana traditions<sup>85</sup> like Zen and Ch'an Buddhism, women have traditionally held leadership roles within monasteries, although not always at the same level as male monastics. However, recent decades have seen a rise in women holding abbacy positions (leading a monastery) and taking on more prominent teaching roles. Many Buddhist organizations worldwide are undertaking internal reforms to promote inclusivity and address gender bias. This may involve revising monastic codes to be more genderneutral, offering equal opportunities for women's monastic education, and encouraging more women to take on leadership roles.

These cases demonstrate the evolving legal landscape in India with regards to the role of women in the administration of religious institutions. They recognize the importance of equality and nondiscrimination in religious institutions and support the advancement of women in these institutions.

#### **Conclusion:**

This study highlights the challenges faced by women in the administration of religious institutions in India, highlighting the limitations of cultural and religious norms, societal attitudes towards gender, and institutional policies. The findings can inform policies and practices aimed at promoting gender equality in religious institutions and supporting women's advancement. This is crucial for religious institutions and society as a whole, as greater representation and participation of women in religious institutions can lead to more inclusive and equitable communities. Despite these challenges, there has been a growing trend of women in India asserting their rights to participate in religious institutions through legal activism, social mobilization, and the formation of women's organizations. However, this study is only a preliminary examination of the role of women in religious institutions in India. Further research is needed to gain a deeper understanding of the challenges and opportunities facing women in these institutions. Future research could include qualitative studies exploring the experiences of women in religious institutions and the factors that shape their experiences, comparative studies to explore differences and similarities across different religious traditions and denominations, and examining the policies and practices of religious institutions in India and other countries that have successfully promoted women's representation and participation.

<sup>85</sup> https://www.europeanproceedings.com/article/10.15405/epsbs.2019.12.04.435 (Acessed on 15/3/2024)

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