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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

THE EXPANDING HORIZONS OF RESERVATION POLICY IN INDIA: A SOCIO-LEGAL ANALYSIS

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Abstract

The history of India's reservation policy begins with the exclusion of the untouchable Brahmin, Kshatriya, Vaishya, and Shudra communities from society. These people were subjected to numerous atrocities and exclusions at the time. As a result, in India, the reservation policy was implemented to uplift the people and grant them their rights; to some extent, it has also been effective in creating social fairness and upward mobility. However, people from impoverished neighbourhoods continue to encounter impediments to social mobility. A reservation system allows for equitable participation and representation in politics and education. It was founded as a result of the long-standing social structure, with the goal of promoting the people and protecting their rights. Provisions relating to reservation are specifically mentioned in Articles 15(4), 15(5), and 15(6) of our Constitution. So this article will provide a gist as to how the reservation policy expanded in India till date. It focuses on various groups that have been provided reservation in our country as well as various judicial pronouncements in which the rights of these reserved classes have been discussed at length.

INTRODUCTION

Reservation has been a long-standing societal concern in India. People usually react unfavourably to it without considering its historical context, forgetting the basic necessities and human rights of the restricted portions of society. Even the constitutional system of social justice aims to level the playing field for historically socially and educationally backward communities by reserving seats in educational institutions and government services. This ensures proportionate representation in education, government, and politics. Originally, it was intended for the backward class society (SCs, STs, and OBCs), which is underrepresented or unrepresented in the government system due to its social and educational backwardness. So its original aim is defectless, but its implementation is

completely flawed. The politics of Reservation has little to do with social fairness; rather, it seeks to maximise its political utility in state assembly and general election campaigns. Therefore, reservation has become a significant topic in Indian politics as well. The Indian Constitution allows the central government, state governments, and union territories to create reserved quotas for socially and educationally backward citizens. Currently, four kinds of persons are eligible for reservation in India: Schedule Castes (SCs), Schedule Tribes (STs), Other Backward Classes (OBCs), and Economically Weaker Sections (EWS). Initially, only SC and STs were eligible for reservation. Following the execution of the Mandal Commission Report, reservations for OBCs were extended in India. In 2019, India expanded its reservation scheme to include EWS among the general population. During British control in India, quotas for specific castes and communities existed in a variety of sectors. Thus, reservations are not a new phenomenon in India.

The reservation policy in India is a form of affirmative action that aims to ensure the representation of historically impoverished or unprivileged communities. So the reservation policy was developed with the good intention of providing social justice to socially and educationally backward areas that have long been marginalized as a result of educational monopolization. Constitution makers and social architects did everything they could to provide reservation as a tool of social justice to the backward classes in order for them to reclaim their rights. However, because the reservation policy has not been fully implemented to far, only a small percentage of the population eligible for reservation advantages has been able to take use of it. If it had been correctly implemented from the beginning, there would be no continuing necessity for the reservation in today's society.¹

HOW RESERVATION SYSTEM EXPANDED IN INDIA

The foundation of Indian reservation policy can be traced back to ancient India, when society was divided into four varnas based on occupation: Brahmins (teachings and spiritual activities), Kshatriyas (kinship and war), Vyasa (business chores), and Shudras. The term 'reservation' refers to reserving a specific number of seats/facilities for a particular class or classes. The goal of reserve was to integrate the underprivileged into society, similar to affirmative action or positive discrimination. The injustice that socially backward people endure as a result of things beyond their control was to

¹ Dr. Vinod Kumar Yadav and Dr. Ravi Ranjan Kumar, Analyzing Core Objective of Reservation in India: Representation vs. Poverty Eradication, 40 Satraachee 28, 2023

be compensated through the reservation by reserving seats for them in different educational and public employment sectors. The Reservation policy's expansion has gone uncontrolled for decades. The lack of effective safeguards over this delicate issue has heightened its contentiousness, which political leaders are exploiting for political gain. Reservation is so firmly ingrained that it cannot be abolished overnight, nor has it risen to its current size in a few years, as has been touted from time to time. As a result, a correct framework must be implemented to deal with it, which addresses the core issues. For this, the notion behind 'right to equality' must be understood in a neutral meaning so that it achieves the exact objective of its presence in the constitution. Equality can be preserved if the scope of change is kept as per the changes taking place in our society. Both society and law are parallel to each other, and they maintain the principles of doctrine of check and balance.²

If we take a look at the current reservation policy in India then the following classes are getting reservation in various areas. These are:

1. Scheduled Castes and Schedule Tribes- Reservations for Scheduled Castes (SCs) and Scheduled Tribes (STs) in India aim for more than only job opportunities. Its primary goal is to empower citizens and ensure their participation in state decision-making. Furthermore, the state is prepared to end practices such as untouchability.

Scheduled Castes (SC) are given a 15% reservation in jobs and higher education, while Scheduled Tribes (ST) get a 7.5% quota. Article 16(4A) makes reservations for recruitment and advancement for the SC/ST group.

The Mandal Commission Report of 1991 introduced the Reservation for Other Backward Classes (OBC) as well. OBCs receive a 27% allocation for government jobs and higher education institutions. The OBC reserve, on the other hand, follows the 'creamy layer' notion.

2. Other backward classes- Only people from the Non-Creamy Layer will be eligible to make OBC reservations. The creamy layer idea eliminates certain affluent OBC members from the level of quota based on their financial and social position. The method also ensures that the benefits of reserving are not passed down to future generations.

² Manvi Priya, ILE Legal blog, Apr 8, 2023

- 3. EWS Reservation**- The Central Government of India has just adopted EWS Reservation. Economically Weaker Sections (EWS) are eligible for a 10% reservation among General Category candidates in government jobs and educational institutions. This is accomplished by incorporating appropriate parts into the Indian Constitution (103rd Constitution Amendment Act, 2019), as well as expanding reservation in India.³

CONSTITUTIONAL PROVISIONS AND AMENDMENTS

The makers of our Constitution sought to create a level playing field for all citizens of the country, therefore they established the notion of "Right to Equality" under Part III of the constitution, which is a Fundamental Right guaranteed to citizens of India. "Fundamental Rights" is a self-explanatory term; it refers to the rights that an individual is granted because of being a human being and a citizen of a country; it is not a favour bestowed upon them, but rather their inherent rights. Fundamental rights are enforceable, which implies that if an individual's fundamental right is violated, he can take his case immediately to the High Court or the Supreme Court under Articles 226 and Article 32, respectively, of the Constitution. Article 32 was even referred to as the "Heart and Soul" of the constitution by Dr. B.R. Ambedkar.

The various constitutional provisions that embrace the concept of equality are:

1. Article 14 – Equality before law / Equal protection of law- Equality before law enunciates the idea of 'supremacy of law' i.e., no man is above law and disregard any favor done to a specific person. It's a negative concept and this idea is borrowed from Britain.

Equal protection of law is a positive concept and borrowed from US. The rule is that 'Like should be treated alike and not that unlike should be treated alike'.

2. Article 15 – No discrimination on the grounds only based on religion, race, caste, sex or place of birth.
3. Article 16 – Equality of opportunities in the matter of public employment.

³ <https://unacademy.com/content/upsc/study-material/general-awareness/the-concept-of-reservation-in-india/>

4. Article 17 – Abolition of Untouchability.

The inclusion of this article is due to the indifferent treatment of the socially backward class, who are considered untouchables. Earlier in history, it was believed that they were so impure that if they crossed the path of Brahmins, the entire path had to be cleaned up. Gandhi ji referred to them as Harijans, meaning those who are close to Hari or God. To a large extent, this is no longer the case; members of such a group can be found in higher-level jobs. People's attitudes have also shifted in this regard.

5. Article 18 – Abolition of Titles.

No title, not being a military or academic distinction, shall be conferred by the state.

No citizen of India shall accept any title from any foreign state.

No person who is not a citizen of India shall, while he holds any office of profit or trust under the state, accept without the consent of the President any title from any foreign state.

No person holding any office of profit or trust under the State shall, without the consent of the President, accept any present, emolument, or office of any kind from or under any foreign State Right to Freedom.

All such Articles uphold the principle of equality and equal treatment. It is a safeguard provided to all citizens of the country against unequal treatment by the state.

The amendments that occurred over the years in terms of reservation are:

1. **The First Amendment Act of 1951** introduced a new clause (4) to Article 15, allowing the state to make specific arrangements for the improvement of socially and educationally disadvantaged persons.
2. **The Seventy-seventh Amendment Act of 1995** adds Clause 4(A) to Article 16. This was done in response to the Supreme Court's decision in the Mandal Commission case, which stated that reservations in promotion could not be made. Clause 4(A) authorises the state to make any provision for reservation in promotions to government employment in favour of SCs/STs if the state believes they are underrepresented in public services.
3. **The Eighty-second Amendment Act of 2000** was enacted to reinstate the relaxation in

qualifying marks and standards of evaluation in both job reservation and promotions for SCs/STs, which was overturned by a Supreme Court decision in 1996.

4. **The Eighty-fifth Amendment Act of 2001** was amended to replace the wording "in matters of promotion to any class" with "in matters of promotion, with consequential seniority, to any class". Thus, these classes would be promoted with a retrospective date of June 17, 1995.
5. **The One Hundred and Second Amendment Act of 2018** - Article 338-B was added, which provides for the formation of the National Commission for Backward Classes. The President will appoint the Chairman, Vice-Chairman, and Commission members. The article defines the commission's functions and powers. The Union and the State shall consult with the commission before enacting any policy or law impacting the socially and educationally backward classes.
6. **One Hundred and Third Amendment Act of 2019** - By inserting clause (6) in Article 15, the state has been given the authority to make any specific provision for the advancement of the economically disadvantaged section of society. They were awarded a 10% reservation in admission to any educational institution. The President will appoint the Chairman, Vice-Chairman, and Commission members. The article defines the commission's functions and powers. The Union and the State shall consult with the commission before enacting any policy or law impacting the socially and educationally backward classes.
7. **One Hundred and Third Amendment Act of 2019** - By inserting clause (6) in Article 15, the state has been given the authority to make any specific provision for the advancement of the economically disadvantaged section of society. They were awarded a 10% reservation in admission to any educational institution.
8. **One Hundred and Fourth Amendment Act of 2019** - Through this amendment, seats for Schedule Caste and Schedule Tribe were reserved in the House of People and the Assemblies of the State for a further period of ten years, i.e., until 2030.⁴

RESERVATION IN EDUCATION

By the late 1970s, there was a noticeable increase in the number of SC/ST staff across various divisions and levels. Despite having a bigger population, OBCs who received reservations in the late 1960s and early 1970s still lag behind SCs and STs in government employment. Reservation has

⁴ Manvi Priya, ILE Legal blog, Apr 8, 2023

benefited SC and ST members, but not as much as predicted. This has heightened the distinction between SCs and STs. A small group of people have assimilated into the middle class, distancing themselves from their traditional caste affiliations in daily interactions. Over the past 30 years, the middle class structure has shifted slightly.

Reservation measures are often criticised for compromising merit and efficiency by giving candidates preferential access to places in higher education and the public sector. The reservation programme has had some success but has also been costly. It is often claimed that reservations favour candidates with moderate abilities over those with outstanding academic performance. This strategy imposes such a high cost that people who have excellent academic records are frequently discouraged from applying for government employment. "The advocates of Reservation, especially judges, typically argue that because minimum qualifications are always associated to posts, there is no harm in reserving a certain proportion of them. This means that a selection committee does not even need to consider selecting the candidates' tests. This is equivalent to declaring that since passing a test requires only a minimum of marks, we do not need to provide first-class trophies or medals. The fundamental question is whether we should value mediocrity by design. Or should we emphasise excellence in all aspects of life and at all levels?"⁵

RESERVATION IN EMPLOYMENT

The increase in the proportion of scheduled castes and scheduled tribes in public services had a beneficial impact on the social and economic circumstances of these two disadvantaged groups. According to data from the Ministry of Personnel, vacancies for scheduled castes, scheduled tribes, and other backward classes are now entirely filled, including in 'elite' services at the centre.

In terms of employment reservations, Article 16(1) states that all citizens must be offered equal opportunities for employment or appointment to any public post. Clause 2 emphasises that no citizen shall be discriminated in respect of employment on the basis of religion, caste, creed, colour, faith, gender, place of birth, etc. The term 'employment' can refer to either permanent, regular, or contractual employment. In the case of *Union Public Service Commission v Dr. Jamuna Kurup*, the Supreme

⁵ Reena Kumari, Social justice and reservation policy in India a critical study, 2015, <http://hdl.handle.net/10603/482841>, pg 210-214

Court ruled that while the term 'employee' was not contained in the D.M.C Act. 1957 or the advertisement, it applied to all employees, including contractual employees. In relation to job reservations, a provision was established for reservation in promotion, as argued in the case *Indra Sawhney v Union of India*, which stated that Article 16(4) does not anticipate or permit reservation in promotion. This was upheld in the 77th Amendment Act of 1995, which states that nothing in this article shall hamper the state from making provision for the promotion in Central or State services in favour of the backward classes.⁶

POLITICAL RESERVATION

Reservations have been fully implemented in political representation at local, state, and national levels. This domain does not face the same issue of unfilled seats or backlogs as services and educational institutions. The constitution and rules ensure that these categories get proportionate representation based on their numbers. The impact of political reserves is controversial, as elected representatives may face competing interests as they represent both their own ethnic community and the electorate as a whole. They must, therefore, aim to appeal to all sectors of voters in order to be elected or re-elected, rather than focusing solely on the weaker sections of the electorate they are supposed to represent. This is not necessarily harmful for social union or national integration. However, it dilutes the concept of social justice, which people from their own ethnic groups might expect them to uphold.⁷

JUDICIAL PRONOUNCEMENTS IN RESERVATION

The Indian judiciary has passed certain decisions preserving reservations, while other decisions have been helpful in implementing them. The majority of reservation-related judgements were later overturned by the Parliament through Constitutional amendments. These are the significant judgements from Indian courts, listed chronologically.

1. *State of Madras v. SMT Champakan Dorai Rajan*⁸

⁶ Roopangshu Banerjee and Punam Kumari Bhagat, Reservation system in India vis-à-vis right to equality: A critical study, *International Journal of Academic Research and Development*, vol 3 issue 3, pg 89-90

⁷ Mahendra Prasad Singh and Niraj Kumar, Reservation policy in India: A review and rethinking, Vol 17, issue2, 452-454

⁸ AIR 1951 MAD 120

The Supreme Court of India made a major decision in this case. This decision introduced the first amendment to India's Constitution. It was India's first groundbreaking reservation judgement. The Supreme Court upheld the Madras High Court decision, which had overturned the government order issued in 1927 in the Madras presidency. The government implemented caste-based reservations in government jobs and education as well. The Supreme Court ruled that granting such a reservation constituted a breach of Article 16(2) of the Indian Constitution.

2. M.R. Balaji and others v State of Mysore⁹

The challenge here was a government order issued by the State of Mysore, which designated backward classes solely on the basis of caste. The Supreme Court's five-judge bench overturned these classifications for a variety of reasons. The courts interpret the expression in Article 15(4) as a 'class of citizen' rather than a caste of citizen.

3. R Chitralakha & Anr v State of Mysore & Ors.¹⁰

The court affirmed the government's order to define 'backwardness' based on occupation, income, and other economic characteristics, without considering caste. The court ruled that, while caste may be relevant in determining backwardness, simply excluding caste does not harm the categorization provided it meets other criteria.

4. Indira Sawhney v Union of India¹¹

The Supreme Court's nine judges bench by a majority of 6:3 ruled that the Union government's decision to reserve 27% of government seats for backward classes was legitimate. Reservations are limited to first appointments and not for promotions, with the total reservation of 50% to avoid eliminating the creamy layer.

5. M Nagraj vs. Union of India¹²

In this case the court determined the constitutionality of the 9th schedule laws using the direct impact and effect test, also known as the Right test which says that it is not the form of law, but the effect that it has that would be the determinative factor.

⁹ AIR 1963 SC 649

¹⁰ AIR 1964 SC 1823

¹¹ AIR 1993 SC 477

¹² AIR 2007 SC 71

6. Ashok Kumar Thakur v Union of India¹³

The Constitution 93rd Act of 2005 does not violate the constitution's basic structure in terms of state-maintained and aided educational institutions. Equality is a multicoloured idea that cannot be defined in a single word. The norms of equality cannot be entirely abolished, leaving citizens in a situation of lawlessness. The court ruled that Article 15(5) is constitutionally valid and that Articles 15(4) and 15(5) are not mutually in contradiction with each other.

7. Jarnail Singh v Lachhmi Narain Gupta & Ors¹⁴

A five-judge Constitution court of the Supreme Court ruled that the 2006 Nagraj case, which included reservation for SC/ST in promotions, did not need to be moved to a larger court. However, Justice Nariman's decision underlined that there is no necessity to collect quantifiable data or to consider SC/ST backwardness while providing reservations in promotions. The ruling in Nagraj case was considered to be adverse to Indira Sawhney's decision since it required the collection of measurable data on backwardness as a prerequisite for awarding reservation in promotion.

CONCLUSION

Reservations are meant to improve social diversity on campuses by decreasing admittance requirements for identifiable groups that are significantly underrepresented in comparison to their numbers in the general population. Caste is the most common criterion for identifying underrepresented populations. Other factors contributing to under-representation include gender (women), state of domicile (North Eastern States, such as Bihar and Uttar Pradesh), and rural status, according to government-sponsored surveys. The underlying idea holds that the underrepresentation of identified groups is a result of Indian caste systems. After India's independence, the Constitution designated certain groups as Scheduled Castes (SC) and Scheduled Tribes (ST). The founders of the Constitution considered that the caste system had historically oppressed and denied SCs and STs respect and equal opportunity in Indian society, leaving them underrepresented in nation-building activities. The Constitution established reserved quotas of 15% and 7.5% for SC and ST applicants in government-aided educational establishments and public sector positions for a five-year period,

¹³ (2008) 6 SCC 1138

¹⁴ AIR 2018 SC 4729

followed by a review of the situation. Nowadays, politicians have a significant influence in reservation policy. The reservation policy was only in place for 10 years after independence to increase the number of SC and ST people, but it is still in effect today, and no action has been taken to reform, revise, or change it. This is due to the country's SC and ST populations. SC and ST voters account for over 33% of the vote, therefore any changes to the reservation policy that disadvantage them will have serious consequences. As a result, they are not taking any actions that contradict the reservation policy.

REFERENCES

1. Dr. Vinod Kumar Yadav and Dr. Ravi Ranjan Kumar, Analysing Core Objective of Reservation in India: Representation vs. Poverty Eradication, 40 Satraachee 28, 2023
2. Manvi Priya, ILE Legal blog
3. <https://unacademy.com/content/upsc/study-material/general-awareness/the-concept-of-reservation-in-india/>
4. Reena Kumari, Social justice and reservation policy in India a critical study, 2015, <http://hdl.handle.net/10603/482841>
5. Roopangshu Banerjee and Punam Kumari Bhagat, Reservation system in India vis-à-vis right to equality: A critical study, International Journal of Academic Research and Development, vol 3 issue 3, pg 89-90
6. Mahendra Prasad Singh and Niraj Kumar, Reservation policy in India: A review and rethinking, Vol 17, issue2, 452-454
7. AIR 1951 MAD 120
8. AIR 1963 SC 649
9. AIR 1964 SC 1823
10. AIR 1993 SC 477
11. AIR 2007 SC 71
12. (2008) 6 SCC 1138
13. AIR 2018 SC 4729