

Situating Right to Worship within Gender Equality: Role in enhancing Opportunities and Obstacles for the Women's Movement in India

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ABSTRACT

The article apprises about the historical and contemporary debate on Right to equality from a 'Gendered' perspective in India. The recent and ongoing turmoil surrounding right to pray and its link with the larger question of women's emancipation is the central theme of this paper. The paper notes that the clamour for "Temple Entry" is a refreshing trend in the women's movement in India since it replaces the State with Civil Society as the final arbiter of change. It seeks to establish the role of egalitarianism within competing narratives of Gender and its visibility in India. The paper classifies the gender discourse between egalitarian socialists and liberal postmodernists in India. Sticking to an objective content analysis the paper claims that, Ms. Trupti Desai, the founder of the Bhumata Brigade has enriched the discourse by transcending this chasm. Religion, Female Body, and Women's movement in India are three key interfaces encompassing this paper.

Keywords: Gender, Religion, Equality, India, Women's movement

SOME HISTORICAL AND THEMATIC INQUIRIES TO THE WOMAN'S MOVEMENT IN INDIA

The great paradox of our modern world is that everywhere men attach importance to the principle of equality and everywhere we encounter in some form or the other the presence of inequality. The more we stress on the principle, the more oppressive does reality become. This attachment to the principle makes us dispassionate in our analysis of inequality. To turn a moral question into a sociological one is the ambition of every student of social theory. However, it is not an ambition which many can reasonably hope to fulfil.¹ Historically, the first step towards a sociological understanding of a problem was taken when a distinction was made between natural inequalities among men and women and inequalities in their 'conditions of existence' to borrow a phrase from Rousseau. The second strand of inequality according to sociologists was social in the sense that it was constructed and not pathological. Feminist thought bases this sociological distinction as its primary analytical tool. Sociologists, especially moral philosophers should not only make men more aware of their predicament but also show them a way out of it.

The popular analogy of Waves in Feminism however does not do sufficient justice to the experience of women's oppression in India. In order to understand and appreciate the ingenuity of the Gender Debate in India it is important to inquire about the origin of the Gender movement in India? It is perhaps fantastic to historicise the woman's question in terms of Waves, however the Indian scenario strikes out - as has been already emphasized in volumes of literature on Gender - because of the layers of domination namely, caste, class, culture and ideology that women find themselves pitted against in India. The history of the women's movement in India has been anything but like three separable enormous waves. Rather, its categorization can be likened more to invisible gusts of gale recouping, engulfing, retreating and eroding against the frictions of literary and practical questions. This analogy is more appropriate to describe the progression of the movement as it underscores the unapparent

debates within the movement. Also, it is representative of the oppositional politics of the women's movement.

Though there are exceptions, largely scholars are united in positing that the Gender movement in India is a post-colonial nation-state phenomenon. The thinking behind this line of thought stems from the fact that it was during the response to colonialism that the Indian women for the first time asserted a united tone of recognition.ⁱⁱ A key to understanding Gender relations in India is to inquire what its articulated targets are. Since the inception of Gender debate in India was in the social reformist movement of 19th century inspired by colonial intellectuals, gender activists have targeted equality between men and women as the bedrock of "transformatory change".

The movement to seek political subjectivity could not take off as expected during the national movement because women continued to play second fiddle to men leaders of the movement. Although the national movement opened up various possibilities for the women to enter politics, it foregrounded their femininity as the embodiment of the spiritual essence of India.ⁱⁱⁱ On the other hand, by positing India as Sovereign in spirit, and by identifying the material-public-political world as the domain in which the struggle for equality and self-determination was to be waged, the national movement simultaneously edged out the issue of women's emancipation from the political domain onto cultural/spiritual making it non-negotiable with the colonial state.^{iv} This strategy of seeking more equality has two vantage points. Firstly, for large part of its history the women's movement has placed a disproportionate emphasis on seeking solutions to gender inequality from the State. The crux of this movement is progressive legislation initiated and managed by the state. It has been well documented that the State in India has acquired a paternalistic character from time to time when it comes to women's emancipation. Two major debates informing this viewpoint are that of Shah Bano and the Women's Reservation Bill for equal representation in Parliament. On both counts, the aspirations for women's emancipation were abjectly unmet by the State. Secondly and almost parallel to the first vantage point, the project for women's equality in India has sought to reform the society of its deeply patriarchal character. For activists targeting this spectrum, the fight is mostly against social customs carrying religious injunction.

Fewer women dared to speak against the societal norms in pre-independent India and those who did were systematically ostracized. Still, the achievements were remarkable. Take the case of Rassundari Devi (born around 1809), who was entirely self-taught and wrote the first autobiography by an Indian woman:

"I was so immersed in a sea of housework that I was not conscious of what I was going through day and night. After some time the desire to learn how to read properly grew very strong in me. I was angry with myself for wanting to read books. Girls did not read. People used to despise women of learning. In fact, older women used to show a great deal of displeasure if they saw a piece of paper in the hands of a woman. But somehow I could not accept this".^v

WOMEN'S MOVEMENT IN INDEPENDENT INDIA

Development planning in India in the years after independence continued to show a disregard for women's productive functions, placing women in atavistic roles as symbols of cohesion and continuity amidst the turbulent flux of modernity.^{vi} Women's movement in the 1970's and 1980's was part of the larger democratic movement which was fueled by emergency all of which stressed the need to redefine development. It is interesting however that while participation in these movements sharpened women's critique of development, a feminist analysis of development which could lead to more focused demands failed to emerge. As a

result two opposing and different perspective on women's struggle against discrimination emerged. While one viewed women's issues woven within the integrated narrative of democratic struggle and opted for mass mobilisations either through trade unions or political parties. The other perspective preferred to see women's groups focus on the specific nature of women's oppression. The energies spent in articulating this difference within a political party they felt would be greater than the gains. This attempt to disengage the women's question from the larger politics of the left and the democratic movement of the 70's looked beyond the state as the sole oppressor. It expressed the concerns of the women's movement woven focally around women's interests, gender-centered issues and the control of female sexuality all of which were critical aspects of institutionalised male domination within the fold of traditional patriarchy.^{vii}

It is later that the women's movement acquired a critical reflexivity on account of the recognition of differences of caste class religion etc. which formed significant tropes around which the diversity of women's experience occurred. On the other hand it also ushered in a conflict within the ranks of the movement particularly on question of religious personal laws where acceptance of a differentiated universalism involved strategic withdrawal from the position of universalism. Personal laws it was argued limited the choices available to women with regard to economic freedom, and inhibited their equality by allotting them a subservient and dependent position in matters of family, inheritance, and financial autonomy.^{viii}

Gender justice need not be necessarily linked to umbrella legislation and that such a legislation might actually prove counterproductive preferring reforms in personal laws, other women's groups have been more inclined to see personal laws as conceptually flawed.^{ix} Post-independence, a crucial change occurred in the fight for women's rights. The battleground for reform was now clearly society and the image of the State as the protector of the General Will to borrow a term from Rousseau again was shunned. Instead, the approach in recent years has been to seek legal confirmation from State agencies of changes the society has come to accept and believe. So, clearly the site of revolution as far as Gender was concerned is society and not the State.

The fight against social customs is often a fight against misrecognition whether it is women, or Dalits or the Tribal people. The Hegelian tradition links desire with recognition, claiming that desire is always a desire for recognition and that it is only through the experience of recognition that any of us becomes constituted as socially viable beings. That view has its allure and its truth, but it also misses a couple of important points. The terms by which we are recognized as human are socially articulated and changeable. And sometimes the very terms that confer "humanness" on some individuals are those that deprive certain other individuals of the possibility of achieving that status, producing a differential between the human and the less-than-human^x

FRACTURES WITHIN THE MOVEMENT

In a country of fluid and intermingling identities like India, women's active participation has seen manifold manifestations some competing against one another. For example the anti-Mandal stir saw a reappearance of women in active politics who staked their claim to equality against a similar claim by Dalit women. Then there was the case of the *Rashtriya Sevika Samiti* which in an ironic inversion of the traditional invisibility of the middle class upper caste women played an active role in communal riots in the wake of the *Ram Janmabhomi movement*.^{xi}

One needs to understand therefore that the category of ‘woman’ was layered and traversed by multiple experiences of oppression. The history of women’s movement in India therefore is a testament of the ideological diversity and a continual effort to build alliances in a bid to imagine successful liberatory change. In this context, it would be sufficient to remark that the successive churnings within the movement have alerted it to the political and ideological dangers of putting forward woman as a unified category.

Thematically speaking, this paper is concerned with this second arena of the gender debate in India that places greater emphasis on fighting social customs to argue for gender neutrality which has seen significant reordering. It is a little difficult to imagine why fighting for common rights should be a problem in a modernising society. A hasty conclusion is that the State is unevenly modern in comparison with its society in India. The state is perhaps reactionary if not medieval when it comes to modernity in specific contexts such as women’s emancipation.

As was seen in the case of Shah Bano, when cornered, the Indian state has an innate proclivity to fashion a paternalistic garb. At this point, it would be safe to remark that religion has often been the embarrassing flashpoint between Indian State and Indian Society. Much like the colonial masters who thought that there was a “domestic domain”^{xii} they could not breach in their project of social reform, the Indian State too has been wary of hurting religious sentiments to the detriment of the women’s movement. The recent controversy over the entry of women in places of worship only reinforces this fact further. In academic circles a difference is made between public patriarchy and social patriarchy. It seems to me that there is good cause to believe in India that the latter feeds the former. This paper is thus bifocal in nature as I have tried responding simultaneously to political conditions and intellectual developments.

RIGHT TO WORSHIP AND THE CONSTITUTIONAL STANDPOINT

Indian Constitution does not make mention of any right to pray as such. Right to religion is guaranteed as a freedom. The situation is similar in other leading democracies of the world like USA for instance where right to religion is among the four most essential liberties. Ideas about religious liberty are said to date back to the last major religious wars in Europe, known as the Thirty Years War (1618-1648). A partial solution to help end these devastating civil wars lay in the terms set out in the peace treaty of Westphalia, which specified the nation-state as the highest level of government. All pre-existing identities were subsumed under the national identities.^{xiii} There is no such right as right to pray or worship in the Indian Constitution. The freedom of Religion is a wide ranging in a show of support for the customs.

The chief of Sabarimala Devasom Board Prayar Gopala krishnan had said women will be allowed into the temple "the day there will be a machine to detect if it's the 'right time'" for women to enter temples, citing the age old custom that regards menstruating women as impure and incapable of entering temples. Following the comment, which was reported in social media, a 20-year-old woman, Nikita Anand, wrote an open letter in the website [Youth ki Awaz](#). What followed was a campaign and a barrage of posts on Twitter and Facebook supporting it. Woman and men wrote under the hashtag #HappytoBleed^{xiv}. A larger response to the event has since gathered under the demand for a right to pray in temples and places of worship where women are barred. This demand challenges social customs whether or not scripturally inducted.

The Constitution of India provides through various articles equality to all citizens of the country irrespective of the religion practiced etc. Article 14 provides that the state shall not deny to any person equality before law and equal protection of laws, whereas Article 15 provides that the state shall not discriminate against any citizen on grounds of any religion,

race, caste, sex, etc. in general or in matters of access to or use of general and public places of worship and conveniences. Above all else, Article 25(1) provides for the very basis of an individual's right to freedom of religion, persons are equally entitled to freedom of conscience and right to freely profess, practice and propagate religion. The scheme of these provisions clearly puts forth the intent to have equality in all spheres, and to promote equal rights of women in matters of religion. Further, denying entry into places of worship to almost half section of the society belittles democracy whether or not it is a democratically won right or not.

RIGHT TO EQUALITY AND GENDER

The right to equality has been conceived in a number of ways. Ronald Dworkin in an essay has sought to make a distinction between the right to equal treatment and the right to treatment as an equal.^{xv} The right to equal treatment is a right to an equal distribution of some opportunity or resource or burden whereas the right to treatment as an equal is the right to be treated with the same respect and concern as anyone else. The second according to Dworkin is fundamental whereas the first is derivative. It can certainly be argued that the right to equal treatment can be more easily sacrificed than the right to treatment as an equal. For gender activists, the right to treatment as an equal follows the right to equal treatment.

Then there is also the question of whether equality as a right enforces equality as a policy. In the Indian scenario, if the past few decades are to learn from, there has been an absence of harmonious conjunction between equality as a right and equality as a policy. In the United States when compared to India, there is much stronger emphasis on equality as a right and perhaps less public support for equality as a policy. This is so because in the United States and much of Europe the value of equality is tied to the individualism. Equality is valued to the extent that it is brought to into being by individuals through their own unaided effort: it is something to be won for themselves by individuals, not imposed upon them by an external agency, particularly the state. If Indians accept equality they are less troubled by having to accept it under state auspices.^{xvi}

Before delving into the debate between equality and individualism, it is opportune here for me to note that the commitment to equality is to be found throughout the constitution. However the right to equality whether equality of opportunity or equal protection of laws will have little value without significant changes in the structure of society. Gender theorists make a distinction between equality as a right and equality as a policy. In the Indian scenario it is impossible to imagine equality-treatment as an equal- becoming a reality without seeking to reorder the social hierarchy dominated by men whether constitutionally ordained or not. Restructuring of social hierarchy calls for dismantling it altogether. Trupti Desai's movement seeks to utilise this strategy to the maximum.^{xvii} But there is more to it than what meets the eye.

SIGNIFICANCE OF TEMPLE ENTRY: ARGUMENTS FOR AND AGAINST

Any radical movement that causes disruption is bound to attract skepticism. There are three arguments being made against the temple entry movement. One is a legal objection that while in agreement with the idea that restriction to place of worship is discriminatory states calls for constitutional precedent. The second argument is a post-modernist one that rejects the politics of emancipation because it does not destroy the structure. And the third argument states that the notion of the practice being discriminatory often is a result of not understanding the issue and conflating the temple rules with other beliefs such as menstruating women being impure. Many temples in India have strange rules due to local customs e.g. only wines are offered as *Prasad* in *Bhairav Mandir* of Ujjain – that doesn't make wine an acceptable religious

beverage among Hindus.^{xviii} Volunteers of this ideology also state that Indian feminist thought is in constant search for symbols of gender Justice. The campaign for temple and subsequently right to pray is most likely an attempt to fulfil this thirst. Let me examine both claims one by one.

I shall now try and explicate these three arguments one by one

Temple entry for Dalits, who had been barred on grounds of "untouchability", was one of the leading social reform movements that ran parallel to the larger Independence movement in the early part of the last century in India. The first legal measure guaranteeing the rights of Dalits to enter temples at par with all other caste Hindus was the Temple Entry Proclamation issued by the then Maharajah of Travancore.^{xix} This opened the doors of all temples in the princely state of Travancore to all classes of Hindus equally which was subsequently followed by the Temple Entry Authorisation and Indemnity Act, 1939 passed in the then Madras Presidency guaranteeing Dalits the right of temple entry there.^{xx} Other states have followed since, and the aforementioned Maharashtra Hindu Places of Worship Act is one of those laws protecting the rights of all classes of Hindus to access places of worship equally. Article 25(2) (b) of the Constitution of India clarifies that temple entry laws are not tantamount to restriction of individual's right to religion under Article 25(1). It is important to bear in mind that the constitution while providing for group rights bases the individual as the arbiter of equality of law. This is clearly inferred from the constitutional assembly debates too.

However, these laws have often been challenged in Court. An interesting case in point is that of The Bombay Harijan Temple Entry Act, 1947 (the precursor to the Maharashtra temple entry law) which was challenged in Bombay High Court. Herein some members of the Jain community argued that it did not apply to them since their temples were not open to Hindus generally, even though the definition of "Hindus" under the Act included Jains. The Bombay High Court upheld this contention holding that Hindus could not be barred from entering the temple but this cannot become a matter of right. Though it was not stated in the judgement itself, but what this directly meant is that Dalits could also therefore not claim to enter the temple as a matter of right under the Bombay Act.^{xxi} This case becomes a keystone in arguing against right to worship against an established social custom. Though the constitution has nullified all discriminations on grounds of race, creed, sex and caste, its equal and concomitant commitment towards protecting groups less represented has given rise to a complex legal construction.

To argue further the above formulation did not necessarily mean that as long as a temple was set up by a given denomination it could ignore all temple entry laws. One must bear in mind that the Constitution protects both an individual right to religion under Article 25 and a denominational right to manage its own religious affairs under Article 26 of the Constitution, so an argument could be made that temple entry laws won't affect a temple used exclusively by a given denomination.^{xxii} The Supreme Court of India in Venkataramana Devaru versus State of Mysore did not think so.^{xxiii} In a challenge raised by a temple meant for *Gaud Saraswat* Brahmins in the coastal regions of the then Mysore state (now Karnataka), the Supreme Court clarified that temple entry laws would also apply to so-called denominational temples. It read the permission to make temple entry laws contained in Article 25 of the Constitution to be applicable as a limitation on the rights of denominations of a religion to manage their own religious affairs, including the running of temples. In effect, as some legal scholars pointed out, it raised the statutory right of Dalits to enter temples to the level of a constitutional right - an interpretation that was perhaps more in line with the Constitution than a pedantic reading would suggest.

As it stands, where a law guaranteeing temple entry for all classes of Hindus for temples which are generally open to the public such a law will validly apply to not just temples which are meant for the general public but also temples for the exclusive use of a denomination. Even if it had been claimed that the Shani Shingnapur temple had been built for a particular denomination of Hindus, women would still have a right to enter such temples under the Maharashtra Temple Entry law.^{xxiv}

RESCUING FEMINISM FROM POST-MODERNISM

Let me now turn my attention to the second argument being offered by persons consciously or unconsciously attuned to the post-modernist thought. Since postmodernists regard religion as a site of oppression, securing equal rights into temples does not provide any credible traction to gender rights. Instead, they would say that by basing the right to equal worship as essential to the cause of gender rights, you are providing legitimacy to many other legacies of religion that are misogynist and sexist. To fight medieval practices and thereby dismantle social hierarchy you must seek refuge in scientific temper. Therefore, the demand for right to pray essentialises our understanding of gender and places scientific temper below tradition.

The criticism that feminist postmodernism is apolitical or anti-political, that it undermines rather than promotes goals proper to feminism, has been restated in various ways and contexts.^{xxv} A good summary is to be found in Jane Flax's 1992 rejoinder to these criticisms, *The End of Innocence*—"you cannot be a feminist and a postmodernist," She announces. Postmodernists are apolitical or anti-political. They are relativists; if we take them seriously, any political stance will be impossible to maintain or justify. Feminists must generate and sustain a notion of truth so that we can adjudicate conflicts among competing ideas and legitimate the claims of (some) feminist theorists and activists. Since postmodernists believe there is no truth, conflict will only be resolved through the raw exercise of power (domination). Postmodernists' deconstructions of subjectivity deny or destroy the possibility of active agency in the world. Without a unitary subject with a secure, empirical sense of history and gender, no feminist consciousness and hence no feminist politics is possible. Since postmodernists believe meanings are multiple and indeterminate, if you write clearly and comprehensibly you cannot be a postmodernist. In fact, postmodernists write obscurely on purpose so that no one outside their cult can understand them. One must choose between either total acceptance or rejection of their position. Acceptance entails abandoning feminism or annihilating its autonomy and force, subordinating it to a destructive and inhospitable, male-dominated philosophy.^{xxvi} Flax's formulation is perhaps a bit of a caricature, but it nevertheless provides a quick review of many of the central themes of the conflict.

The meaning of the term is not settled between theorists and Judith Butler is prominent among the ones who have challenged its utility in challenging the power structures. Elsewhere the conflict has been articulated as a matter of foundations. Particularly in the 1995 volume *Feminist Contentions* (structured as a series of essays and critical responses between Seyla Benhabib, Judith Butler, Drucilla Cornell, and Nancy Fraser), we see the debate move from one about feminism and postmodernism to a more specific conflict between critical theory and poststructuralism to an argument over foundations. Benhabib's question, 'Can feminist theory be postmodernist and still retain an interest in emancipation?' frames the debate.^{xxvii} Since postmodernist thought undisputedly operates on three theses the death of history, the death of truth, and the death of metaphysics. This formulation while helpful in implicating power structures proves insufficient if not fatal for a feminism modelled on liberatory change. Because if there is no history, subject and truth it not only subverts patriarchal conceits hidden in these tropes but also stifles politics of emancipation which is what the right to entry movement calls attention to.

A third although slightly less influential argument has been offered against the ‘right to entry’ in temples. This is a traditionalist argument that comes from an ecofeminist point of view and regards the disruption as a cause for greater concern since it will open up the floodgates of challenging every traditional practice; the practice of ‘*Kumbh Snan*’ or worshipping of ‘sacred Groves’ for instance that have ecological values attached to them on the pretext of free thought. The concern is certainly overstated for two reasons. One, Democracy is a socio-political experiment and social change in India is impossible to force without arbitration between affected parties. Two, it is in the guise of the same argument of representing minority rights that women’s emancipation is sought in the first place. This is less apparent because the constituency of women does not find place as a political force much like the tribes or castes in the Indian republic.

IN LIEU OF A CONCLUSION

To conclude, the year and half long battle to secure equal rights to pray in India is remarkable for three important reasons. Firstly, it has marked a shift in the strategy of placing the State as the only arbiter of change. The wide public support received for Trupti Desai and her brigade reflects the prolificacy for change. Also it has largely been a movement inspired by volunteers. In the case of Haji Ali Dargah, Muslim women voluntarily joined the ranks in opposition to the dictum that they not be allowed because it is referred in Quran that allowing women close proximity to the shrine of a male saint is a grievous sin.^{xxviii} This is a game-changer of sorts because like it was emphasised in the long introduction of this essay, the women’s movement in India so far has been an attaché to the larger democratic movement. The mode and gravity of disruption caused by the right to pray movement has the potential for injecting a feeling of distinctness and novelty in the women’s movement.

Secondly, any mobilisation that challenges our existing notions only enriches the debate by exposing its flaws. Hence, in the context of the debate between equality and individualism vis-à-vis Gender of which I have made eloquent mention, we must be constantly willing to upgrade and promote evaluation over assessment. In other words, the question “What should be the entity of social action- the individual or group” must clearly be reframed because it presupposes a binary between the two. Any group is formed when individuals unite with a common purpose, suspending other aspects of their individuality.

Finally, shorn of all ethical and legal constructions, denying the right to worship to half the sections of society cannot be part of a legal covenant in 21st century. The only source of such discrimination can come from patriarchy which has to be detested with. The argument supposes an inferiority of women and it comes from menstruation in the case of *Sabarimalai*, their risqué behaviour as a congregant (the haj committee in their argument to the Bombay High court cited the constant bending of women devotees who wore short blouses thereby exposing their breasts as a possible cause for concern if they were allowed inside the *Mazaar* premises) at Haji Ali Dargah, or their impurity in the case of Shani Shingnapur. Any opposition to such an abject embodiment of a woman’s sexuality and a narrative that proves them of being weak or incapable must be fully supported.

ⁱBeteille, Andre (2005). *The two sources of Inequality in Anti-Utopia*, Essential writings of Andre Beteille. New Delhi: Oxford University Press.

ⁱⁱ Sen, Samita (2000). *Toward a Feminist Politics? The Indian Women’s Movement in Historical Perspective*. Policy Research Report On Gender And Development. Department of History, Calcutta University: The World Bank Development Research Group/ Poverty Reduction and Economic Management Network

- iii Roy, Anupama (2010). *The Women's movement in the Oxford Companion to Politics in India*. New Delhi: Oxford University Press.
- iv Chatterje, Partha (1994). *The Nation and its Fragments: Colonial and Postcolonial Histories*. New Delhi: Oxford University Press.
- v Susie Tharu and Lalita. K, eds., (1991). *Women Writing in India: 600 B.C to the Present. Volume 1: 600 B.C to the Early Twentieth Century*. New York: Feminist Press.
- vi Roy, Anupama. *Ibid*
- vii Chakravarty, Uma (2012) *How Autonomous Is Women's Autonomous Movement Samyukta: A Journal of Women's Studies*, V(2), pp 40-60
- viii Roy, Anupama. *ibid*.
- ix Vasanthi,Raman (1999). *The women's question in Contemporary Indian Politics*. New Delhi: Lokayan.
- x Butler, Judith (2004). *Undoing Gender*. New York and London Routledge.
- xi Sarkar, Tanika. (1996). 'Hindu Women: Politicisation through Communalisation' in Kumar Rupesinghe and Khawar Mumtaz (eds) *Internal Conflict in South Asia*. London: Sage Publications..
- xii Mill, James (1817). *History Of British India*. London: Baldwin, Cradrock and Joy.
- xiii Mary Lea Cox freedom of Worship, Carnegie Council
http://www.carnegiecouncil.org/education/001/four_freedoms/5224.html (Last accessed on January 4, 2017)
- xiv Sneha Mary Koshy and Sanyal Anandita "No right time to enter Sabarimala temple. Women say #Happy to Bleed" , November 24, 2015. <http://www.ndtv.com/india-news/no-right-time-to-enter-sabarimala-temple-women-say-happyto-bleed-1246681> (Last accessed on January 7, 2017)
- xv Dworkin, Ronald (1997). *Reverse Discrimination in Taking Rights Seriously*. London: Duckworth.
- xvi The classic formulation of this linkage is in Tocqueville A. De, 1956, *Democracy in America*, 2 Vols. New York: Knopf, but see also A. Beteille, 1986, "Individualism and Equality", *Current Anthropology*, Vol. 27, no.2, April pp. 121-34
- xvii Zee Media Bureau (March 30, 2016) "Bombay High Court backs entry of women in Shani Shingnapur temple"
http://zeenews.india.com/news/maharashtra/bombay-hc-lifts-ban-on-womens-entry-in-shani-shingnapur-temple_1870657.html (Last accessed on January 2, 2017)
- xviii OpIndia editor (January 26, 2016) "Right to worship: The good, the bad, and the ugly aspects of the 'debate'".
<http://www.opindia.com/2016/01/right-to-worship-the-good-the-bad-and-the-ugly-aspects-of-the-debate/> (Last accessed on January 13, 2017)
- xix Temple Entry Proclamation (1936) Maharaja of Travancore.
http://shodhganga.inflibnet.ac.in/bitstream/10603/27845/7/07_chapter%20.pdf (Last accessed on January 11, 2017)
- xx Manicka Sundara Bhattar And Ors. vs R.S. Nayudu, Executive Officer ... on 15 December, 1944
<https://indiankanon.org/docfragment/1116061/?formInput=temple%20entry%20act> (Last accessed on January 5, 2017)
- xxi Gallanter, Marc (1960). *Temple entry and The Untouchability (Offences) Act, 1955*. The Indian Law Institute.
[http://14.139.60.114:8080/jspui/bitstream/123456789/15101/1/018_Temple-Entry%20and%20the%20Untouchability%20\(Offences\)%20Act,%201955%20\(185-195\).pdf](http://14.139.60.114:8080/jspui/bitstream/123456789/15101/1/018_Temple-Entry%20and%20the%20Untouchability%20(Offences)%20Act,%201955%20(185-195).pdf) (Last accessed on December 21, 2016)
- xxii Prasanna Kumar, Alok (April 12, 2016) "Women in Shani Shingnapur temple: A brief history of entry laws and how times are changing"
<http://www.firstpost.com/india/women-in-shani-shingnapur-brief-history-of-temple-entry-laws-and-how-times-are-changing-2723582.html> (Last accessed on January 12, 2017)
- xxiii Rajaratnam, S. "Law and Religion: Will the Twain never meet"? February, 2016)
<http://new.modernrationalist.com/2016/02/law-and-religion-will-the-twain-nwver-meet/> also (Last accessed on December 29, 2016)

^{xxiv}Prasanna Kumar, Alok (April 12, 2016) “Women in Shani Shingnapur temple: A brief history of entry laws and how times are changing” <http://www.firstpost.com/india/women-in-shani-shingnapur-brief-history-of-temple-entry-laws-and-how-times-are-changing-2723582.html> (Last accessed on January 12, 2017)

^{xxv} Mann, Bonnie (2006). *The stakes of Feminism and Postmodernism in Women’s Liberation and the Sublime: Feminism Postmodernism and the Environment*. New York: Oxford University Press.

^{xxvi} Flax Jane(1987). *Postmodernism and Gender Relations in Feminist Theory*, Signs, Vol. 12, No. 4, Within and Without: Women, Gender, and Theory. pp. 621-643.

^{xxvii} Benhabib, Seyla (1995). *Feminist Contestations: A philosophical Exchange*. Seyla Benhabib, Judith Butler, Drucilla Cornell, Nancy Fraser New York: Routledge.

^{xxviii} First Post staff (August 28, 2016) “Trupti Desai offers prayer at Haji Ali Dargah but keeps away from the inner sanctum” <http://www.firstpost.com/india/trupti-desai-offers-prayer-at-haji-ali-dargah-but-keeps-away-from-the-inner-sanctum-2980400.html> (Last accessed on Jan 12, 2017)