

India's defiance of religious freedom

A briefing on "anti-conversion" laws

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Abstract

While the Constitution of India provides for full religious freedom, six states have "Freedom of Religion" Acts which regulate religious conversions. These laws give the district administration wide and sweeping powers to inquire into religious conversions. They also require a person converting to another religion to give details of the conversion to the local district magistrate. Vague and wide definitions of terms such as "force," "fraud" and "inducement" or "allurement," potentially include even legitimate pursuits or actions of propagating one's faith. The laws are premised on claims that minority Christians and Muslims use duress, deception or coercion to convert poor and illiterate Hindus and threaten public order. These Acts have been harshly criticized from national and international agencies.

Keywords Anti-conversion, freedom, religion, constitution, India, Hindu.

"I fear this bill... will not help very much in suppressing the evil methods [of gaining converts], but might very well be the cause of great harassment to a large number of people. Also, we have to take into consideration that, however carefully you define these matters, you cannot find really proper phraseology for them... The major evils of coercion and deception can be dealt with under the general law. It may be difficult to obtain proof but so is it difficult to obtain proof in the case of many other offences, but to suggest that there should be a licensing system for propagating a faith is not proper.

It would lead in its wake to the police having too large a power of interference."

Jawaharlal Nehru, *India's First Prime Minister*

1. Introduction

In spite of a diverse and rich cultural heritage², India has also had an equally turbulent history of communal tensions, especially between the rightwing Hindus, who

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² According to the 2001 Census of India, 80.5 percent of the total population is Hindu while Muslims account for 13.4 percent and Christians 2.3 percent.

see India as a Hindu nation and the minority Christian and Muslim communities. The primary grouse against the minority Christian community is on the issue of religious conversions, and many states in India have sought to enact Freedom of Religion Acts or anti conversions laws.³

The first state to enact the Freedom of Religion Act was Orissa in 1967 during the rule of the then Swatantra Party, which was known for its Right leanings.

The Madhya Pradesh Freedom of Religion Act was enacted in 1968 and when Chhattisgarh was carved out of Madhya Pradesh in November 2000 it inherited the anti-conversion law from the latter.

The Congress Party enacted the Freedom of Indigenous Faith Act in Arunachal Pradesh in 1978 to preserve indigenous faiths. However, until today the law has not been implemented as the Rules governing the Act are yet to be framed.

In 2002, the Tamil Nadu state assembly ruled by a regional party passed the Prohibition of Forcible Conversion of Religion Bill to please the Bhartiya Janta Party (BJP), its ally. But, after the defeat of the BJP-led coalition in the 2004 general elections, the state government repealed the law. However, a year later, the BJP government in Gujarat passed the Freedom of Religion Act in March 2003.

In April 2006, the BJP-led government in Rajasthan passed a similar freedom of religion bill. However, assent of the President of India is still awaited after the Bill was forwarded to the President by the then Governor of Rajasthan, Pratibha Patil. The BJP in Madhya Pradesh and Chhattisgarh also unsuccessfully sought to tighten the existing laws the same year, even as the Congress Party government in Himachal Pradesh passed the Freedom of Religion Act for political consideration months before state assembly elections.

1.1 Effect of the legislation

In several states, prosecutions have been launched under the Freedom of Religion Acts against members of the minority Christian community. There have also been frequent attacks against the community by members of Rightwing Hindu groups on the pretext of “forcible” conversions. However, in spite of the existence of these acts

³ The Freedom of Religion Acts were first brought into force in the princely states, where the British Crown had suzerainty and not a direct rule, in the 1930s. The Raigarh State Conversion Act 1936, the Patna Freedom of Religion Act of 1942, the Sarguja State Apostasy Act 1945 and the Udaipur State Anti-Conversion Act 1946 are some examples of these laws. Post-independence, the Indian parliament took up for consideration a legislative enactment regulating religious conversion known as Indian Conversion (Regulation and Registration) Bill of 1954, and later the Backward Communities (Religious Protection) Bill of 1960, and then the Freedom of Religion Bill of 1978 introduced by Member of Parliament OP Tyagi, who was a member of a Hindu nationalist party. However, all these measures were dropped for lack of majority support. (See Anant, A. [2002] *Anti-Conversion Laws, The Hindu* [17 Dec.], National section, Delhi edn).

in some states for over forty-five years, there have been very few convictions, though cases are registered under the Acts almost every month. For example, in the year 2010, at least eighteen arrests were reported under the anti-conversion and other restrictive laws in Chhattisgarh and Madhya Pradesh alone.⁴

Taking note of this trend, in its 2011 report, the United States Commission on International Religious Freedom (USCIRF) noted⁵ that:

“The harassment and violence against religious minorities appears to be more pronounced in states that have adopted ‘Freedom of Religion’ Acts or are considering such laws...”

The report further stated that:

These laws have led to few arrests and reportedly no convictions. According to the U.S. State Department between June 2009 and December 2010 approximately twenty-seven arrests were made in Madhya Pradesh and Chhattisgarh, but resulted in no convictions. Compass Direct reported that in March 2011, police arrested twelve Tribals in Orissa's Mayurbhanj district for violating the Orissa ‘Freedom of Religion Act’ by converting to Christianity without a permit issued by the authorities.

Asma Jahangir, the Special Rapporteur on Freedom of Religion or Belief, also noted in her report after a visit to India that:

Even in the Indian states which have adopted laws on religious conversion there seem to be only few – if any – convictions for conversion by the use of force, inducement or fraudulent means. In Orissa, for example, not a single infringement over the past ten years of the Orissa Freedom of Religion Act 1967 could be cited or adduced by district officials and senior officials in the State Secretariat...

However, such laws or even draft legislation have had adverse consequences for religious minorities and have reportedly fostered mob violence against them.⁶

The report goes on to state that:

There is a risk that Freedom of Religion Acts may become a tool in the hands of those who wish to use religion for vested interests or to persecute individuals on

⁴ International Religious Freedom Report, 2010, US State Department (<http://www.state.gov/g/drl/rls/irf/2010/148792.htm>).

⁵ USCIRF Annual Report 2011 – The Commission's Watch List: India (last accessed at <http://www.unhcr.org/refworld/country,,,IND,,4dbe90bac,0.html> on November 11, 2011).

⁶ Report of the Special Rapporteur on freedom of religion or belief, Asma Jahangir, Addendum, MISSION TO INDIA (A/HRC/10/8/Add.3, 26 January 2009) accessed at <http://www.wghr.org/pdf/3.%20Special%20Rapporteurs.pdf> on November 11, 2011).

the grounds of their religion or belief. While persecution, violence or discrimination based on religion or belief need to be sanctioned by law, the Special Rapporteur would like to caution against excessive or vague legislation on religious issues which could create tensions and problems instead of solving them.

A fact finding team of the National Commission for Minorities in India in a report after a visit to the states of Madhya Pradesh and Chhattisgarh between June 13 and 18, 2007 noted that Hindu extremists frequently invoked the anti-conversion law in Madhya Pradesh as a means of inciting mobs against Christians or having them arrested without evidence.⁷ They noted in their report:

Obviously, the life of Christians has become miserable at the hands of miscreants in connivance with the police. There are allegations that when atrocities were committed on Christians by the miscreants, police remained mere spectators and in certain cases they did not even register FIRs [First Information Reports].

2. Basic features of the acts

2.1 Preamble

The Freedom of Religion Acts claim to prohibit conversions by force, fraud and inducement or allurement. The Acts state that no person shall convert or attempt to convert, either directly or otherwise, any person from one religious faith to another by the use of force or by inducement or by any fraudulent means nor shall any person abet any such conversion.

2.2 Definitions

The Acts in Orissa, Madhya Pradesh and Himachal Pradesh define conversion as “renouncing one religion and adopting another.” The Arunachal Pradesh law differs slightly, as it defines it as “renouncing an indigenous faith and adopting another faith or religion.”⁸ The Gujarat law states that conversion means “to make one person to renounce one religion and adopt another religion.”⁹

All the Acts define “force” as “a threat of injury of any kind including the threat of divine displeasure or social ex-communication,” and “fraud” or “fraudulent means” as “misrepresentation or any other fraudulent contrivance.” The term “inducement” has been defined in some of the Acts¹⁰ as “the offer of any gift or gratifi-

⁷ State in India tightens controls on conversions (*Compass News Direct*, July 25, 2006).

⁸ Section 2 (b), Arunachal Pradesh Freedom of Religion Act, 1978 Section 2 (b).

⁹ Section 2 (b), Gujarat Freedom of Religion Act, 2003.

¹⁰ Section 2 (d) the Orissa Pradesh Freedom of Religion Act, 1967 and the Himachal Pradesh Freedom

cation either in cash or in kind, including the grant of any benefit, either pecuniary or otherwise,” while the other Acts¹¹ use the term “allurement” and define it as offer of any temptation in the form of any gift or gratification either in cash or kind, and grant of any material benefit, either momentary or otherwise.

2.3 Contravention

The Acts carry penal provisions and punishments generally ranging from up to one year of imprisonment and a fine of up to 5,000 Indian rupees, to up to three years of imprisonment and a fine of up to 25,000 Indian rupees.

The punishment is more stringent if there is evidence of conversion by force, fraud or inducement among women, minors and Dalits (formerly “untouchables” as per India’s caste system) or Tribals (aborigines). Apart from penal action, the Himachal Pradesh law states that if any person has been converted by force, fraud or coercion, she or he shall be deemed as not converted.¹²

Failure to send notice to or seek permission from the district magistrate before converting or participating in a conversion ceremony is liable for a fine under the Acts.

3. Critique of the Acts

3.1 Vague and overly broad definitions

The primary critique of the Acts due to their vague and overtly broad definitions has come from several jurists. The United Nations Special Rapporteur on Freedom for Religion or Belief has stated in her report:¹³

While these laws appear to protect religious adherents only from attempts to induce conversion by improper means, they have been criticized on the ground that the failure to clearly define what makes a conversion improper bestows on the authorities unfettered discretion to accept or reject the legitimacy of religious conversions. All of these laws include in the definition of use of force any ‘threat of divine displeasure or social excommunication.’

Moreover, the terms inducement or allurement are defined to include the offer of any gift or gratification, either in cash or in kind, as well as the grant of any benefit, either pecuniary or otherwise. These broad and vague terms might be interpreted to cover the expression of many religious beliefs. In addition, some

of Religion Act, 2006 and section 2 (f) of the Arunachal Pradesh Freedom of Religion Act, 1978.

¹¹ Section 2 (a) the Madhya Pradesh Freedom of Religion Act, 1968 and the Gujarat Freedom of Religion Act, 2003.

¹² Section 3, proviso of the Himachal Pradesh Freedom of Religion Act, 2006.

¹³ A/HRC/10/8/Add.3 (page 17).

provisions are discriminatory in giving preferential treatment to re-conversions, for example by stipulating that returning to the forefathers' original religion or to one's own original religion shall not be construed as conversion."

In March 2007, the National Commission for Minorities noted with concern the enactment of the Himachal Pradesh Freedom of Religion Act and observed that "the terminology used in the [Himachal Pradesh Freedom of Religion] Act and the methodology prescribed for implementing it". The Commission also expressed its "profound concern over the "attempt of the Act, and reportedly by similar pieces of legislation contemplated in some other States, to interfere with the basic right of freedom of religion that is the birth right of every Indian."¹⁴

3.2 Conversion

The definition of conversion in these Acts overlooks the fact that conversion is primarily a thought process which may span several days, weeks or even years. And the definition in the Gujarat Act in particular suggests that conversion requires an external agency almost without the will of the prospective convert.¹⁵

On the contrary, the Supreme Court of India has held on several occasions that mere declaration of conversion cannot be taken as evidence of conversion; "but a bonafide intention to be converted in the Hindu faith, accompanied by conduct unequivocally expressing the intention may be sufficient evidence for conversion. No formal ceremony for purification or expiation is necessary to effectuate conversion. . ."¹⁶

3.3 Force

The definition of the term "force" as "threat of divine displeasure" unjustifiably impinges on possible interactions between potential converts and those seeking to propagate their faith. It restricts the latter from informing the former about non-adherence, for example, as that may involve teachings on hell or God's wrath. And without being informed, a potential convert cannot meaningfully exercise his or her freedom to change religion.

Proponents of these laws often quote the Orissa High Court ruling in *Yulitha Hyde vs. State of Orissa*¹⁷, which held, "Threat of divine displeasure numbs the mental faculty; more so of an undeveloped mind and the actions of such a person thereafter, are not free and according to conscience."

¹⁴ The full press release is available at the National Commission for Minorities website at <http://ncm.nic.in/The-Himachal-Pradesh-Freedom-of-Religion-Act.html> (last accessed on November 11, 2011).

¹⁵ Sec. 2 (b) of the Gujarat Freedom of Religion Act, 2003.

¹⁶ *Perumal Nadar vs. Ponnuswami* (1971 AIR 2352).

¹⁷ All India Reporter 1973 Ori 116.

The courts in India have also reasoned that threatening anyone with divine displeasure puts great pressure on the threatened person and deprives them of the capacity of exercising their rational judgment. Repeatedly the courts have held that a suggestion of divine displeasure deprives a person of their abilities to make a choice.

However, this argument overlooks the fact that inherent in the propagation of a faith or religious belief is the articulation of the effects of failure to comply with the said beliefs. Commenting on this, noted social commentator, Pratap Bhanu Mehta¹⁸ says:

In some ways this argument is bizarre. The intent of the statute seems to be to exclude certain kinds of religious appeals. There might be good reasons for excluding such appeals. The principal one might be the Hobbesian [of political theorist Hobbes] insight that in order to discharge our obligations to the state faithfully, we have to be relieved of all those sources of authority that induce even more fear in us than the state might. Or one might argue, on Rawlsian [of theorist John Rawls] grounds, that as a mark of reciprocity, one ought not to appeal to one's own comprehensive conception of the good in making public arguments...

...In *Yulitha Hyde vs. State of Orissa*, the court wrote: 'Threat of divine displeasure numbs the mental faculty; more so of an undeveloped mind and the actions of such a person thereafter, are not free and according to conscience.' In cases involving the Representation of People's Act (RPA) the same assumption is made throughout.

If this analysis is correct, we can see a fairly stable set of assumptions about citizens that underlie two different domains that require abridging religious speech, whether it is attempts at conversion and the exclusion of religious appeal from elections. The court assumes throughout that citizens are, when it comes to receiving religious speech, or speech about religion, incapable of managing the impressions they receive – to use an old stoic concept.

If the insult is to one's religion, or an exhortation is made in the name of religion, we are incapable of receiving the expression on our own terms; incapable of managing our own responses, condemned to receiving these expressions unfreely and helplessly, incapable as it were of self-discipline. We can manage our impressions, exercise our religious choices and practice judgment, only when left alone. Hence the court's emphasis that the right to freedom of religion just means the right to freedom from other people's religion. Our choices are impaired, or faculties numbed, more so because we have undeveloped minds. This is the 'secret' rationale behind both anti-conversion legislation and the RPA.

¹⁸ Passion and constraint, Mehta, Pratap Bhanu (In Rajeev Bhargava [ed.] *The moral and political philosophy of the Indian Constitution*, Oxford University Press, 2008).

Members of the constitution drafting committee noted that freedom of speech covers the right to propagate one's faith:

“...Under the freedom of speech which the Constitution guarantees it will be open to any religious community to persuade other people to join their faith. So long as religion is religion, conversion by free exercise of conscience has to be recognized. The word ‘propagate’ in this clause is nothing very much out of the way as some people think, nor is it fraught with dangerous consequences.”

Article 19 (1) (a) of the Indian Constitution states that all citizens shall have the right to freedom of speech and expression, when this right is curtailed by limiting what aspects of one's faith can be shared.

3.4 Fraud

The definition of the word “fraudulent” as “misrepresentation or any other fraudulent contrivance” may seem innocuous on the face of it, but it is not. In spiritual matters, what would constitute misrepresentation? Could a statement like, “Prayers will heal you,” or “God will grant you material blessings,” be construed as employing fraudulent means? There is no answer.¹⁹

3.5 Inducement/allurement

A problem in defining the term “inducement” or “allurement” as “offer of any temptation in the form of any gift or gratification either in cash or kind or grant of any material benefit either monetary or otherwise” was noted by the Orissa High Court in *Yulitha Hyde vs. State of Orissa*. The court held that the vague nature and wide scope of the term would impinge on various legitimate methods of proselytizing. While the Supreme Court subsequently overruled the Orissa High court's decision in *Rev. Stanislaus vs. Madhya Pradesh*²⁰, the court chose not to comment on the definitions provided under the Acts.

Supreme Court senior advocate Prashant Bhushan commenting on the provision is quoted as saying, “Anything can be called allurement. In many Christian institutions, education for Christians is free, so if somebody changes his or her religion, even education can be defined as allurement.”²¹

¹⁹ See All India Federation of Organizations for Democratic Rights Report on Anti Christian violence and the myth of conversion, as quoted in *The politics behind Anti Christian violence* (Media House, 2006) (pg. 410).

²⁰ 1977 (1) Supreme Court Cases 677.

²¹ *Raipur's one-way conversion street*, Dutt, Avinash (Tehelka, Sep 02, 2006).http://www.tehelka.com/story_main19.asp?filename=Ne090206Raipurs_one.asp.

3.6 Arbitrary, wide powers

The Acts give district authorities wide and sweeping powers to inquire into both the reasons behind a religious conversion and the procedure adopted for the same. This is a gross violation of the right to freedom of association, the right to privacy and the freedom of conscience. The Acts cast an onerous burden on the part of the converttee and the persons seeking to propagate their faith without providing the required checks and balances to ensure protection against misuse of authority.

For example, Section 4 of the Himachal Pradesh Act makes it obligatory for a person to give a thirty-day prior notice to the District Magistrate about his or her intention to convert. As per the Rules, the District Magistrate then “shall get the matter enquired into by such agency as he may deem fit”. No time limit is prescribed for the conduct of such an enquiry nor have its modalities been defined.

A similar law calling for the regulation and registration of converts was sought to be introduced in the Indian Parliament in 1955. But the then Prime Minister, Jawaharlal Nehru, said:

I fear this bill... will not help very much in suppressing the evil methods [of gaining converts], but might very well be the cause of great harassment to a large number of people. Also, we have to take into consideration that, however carefully you define these matters, you cannot find really proper phraseology for them. Some members of this House may remember that this very question, in its various aspects, was considered in the Constituent Assembly, [and] before the Constituent Assembly formally met, by various sub-committees... Ultimately, Sardar Patel got up and said, ‘Let there be no heat about this matter – because there was heat – it is obvious that three committees have considered this matter and have not arrived at any conclusion which is generally accepted. After that, they came to the conclusion that it is better not to have any such thing because they could not find a really adequate formula which could not be abused later on.’

The major evils of coercion and deception can be dealt with under the general law. It may be difficult to obtain proof but so is it difficult to obtain proof in the case of many other offences, but to suggest that there should be a licensing system for propagating a faith is not proper. It would lead in its wake to the police having too large a power of interference.”²²

The parliament, accepting his advice, rejected the bill. It had the support of only one member, the rest of the House being opposed to its adoption.

²² As quoted by Arcot Krishnaswami, Special Rapporteur of the Sub-Commission on Prevention of Discrimination and Protection of Minorities in Study of discrimination in the matter of religious rights and practices (1960).

3.7 Requirement of notice/prior permission

The Acts require the person converting to give details of his or her conversion to the district magistrate, either prior to the conversion ceremony or subsequent to it. The Gujarat law states that the person seeking to be converted must obtain prior permission from the concerned district magistrate before any conversion ceremony is performed.

The Acts therefore greatly impinge on the freedom of conscience of a prospective convert and also on their right to privacy. The person is rendered incapable of taking the final decision with regards to his or her faith and instead requires the seal of approval of the local district authority.

Article 18 of the Universal Declaration of Human Rights distinguishes the freedom of thought, conscience, religion or belief from the freedom to manifest religion or belief. It does not permit any limitations whatsoever on the freedom of thought and conscience or on the freedom to have or adopt a religion or belief of one's choice. These freedoms are protected unconditionally, as is the right of everyone to hold opinions without interference in article 19.1. In accordance with articles 18.2 and 17, no one can be compelled to reveal his thoughts or adherence to a religion or belief.²³

The United Nations Special Rapporteur on Freedom of Religion or Belief, Asma Jahangir, noted in her report²⁴ that:

The requirement of advance notice or prior permission seems to be unduly onerous for the individual who intends to convert. Any state inquiry into the substantive beliefs and motivation for conversion is highly problematic since it may lead to interference with the internal and private realm of the individual's belief (*forum internum*). This approach is aggravated if such a Freedom of Religion Act awards specific protection to the state government and its officers against prosecution or legal proceedings with regard to 'anything done in good faith or intended to be done under the Act or any rule made thereunder.' Moreover, it seems unclear who may bring an action for, or lodge an appeal against, decisions with regard to the permissibility of a religious conversion.

She also said that: "Any concern raised with regard to certain conversions or how they might be accomplished should primarily be raised by the alleged victim."

²³ Human Rights Committee, General Comment 22, Article 18 (Forty-eighth session, 1993). Compilation of general comments and general recommendations adopted by Human Rights Treaty Bodies, U.N. Doc. HRI/GEN/1/Rev.1 at 35 (1994).

²⁴ United Nations. A General Assembly A/HRC/10/8/Add.3 26 January 2009 (Para 49).

The provisions of the Acts fail to provide any safety mechanisms for those on whom they are casting a burden to disclose sensitive information. Besides, the mandatory declaration sought by the Acts violates Article 19 (1) (b) and (c) which give every citizen the right to assemble peaceably without the interference of the State.

Besides, the provision for public enquiry into conversions and mandatory intimation violate the right to privacy, which the Supreme Court of India has repeatedly held to be implicit in the right to life in Article 21.

3.8 Exemption of reconversion

The exclusion of “reconversions” in some of these laws violates the right to equality before law as promised under Article 14, which states: “The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India.”

The proviso to Section 4 of the Himachal Pradesh Act, states that “no notice will be required if a person reverts back to his original religion.” This is an unreasonable classification and the legislature has failed to distinguish why a special provision is required for non-notification in the event of reconversion to “original religion.”

Similarly, the law in Arunachal Pradesh defines the term “conversion ” as “renouncing an indigenous faith and adopting another faith or religion,” and further defines the term “indigenous” to mean “such religions, beliefs and practices including rites, rituals, festivals, observances, performances, abstinence, customs as have been found sanctioned, approved, performed by the indigenous communities of Arunachal Pradesh. . . .”

The Acts seek to differentiate between “indigenous faiths” and other religions and yet they fail to provide a reasonable nexus as to why “indigenous” faiths require special protection under the law.

3.9 Sufficiency of existing laws

The anti-conversion laws have been enacted on the basis that conversions by force, fraud or inducement disrupt public order. However, the Indian Penal Code carries enough provisions to deal with it, such as Section 153A, which prohibits: promoting by words or symbols “feelings of enmity, hatred or ill-will” against religious groups, committing acts prejudicial to the harmony of religious groups, or organizing activities with the intent that participants train to use force or actually use force against religious groups. The punishment for these offenses is increased if they occur in a place of worship or at a religious ceremony.

Hamid Ansari, the Vice President of India and the former chairperson of the National Minorities was quoted as saying, “If somebody has carried out a conversion by use of force or cheating, then there are enough provisions in the Indian Penal

Code to bring him or her to book.” He added, “Also, there is no data to establish that cases of conversion derived through coercion or cheating were sufficient to deserve special laws. It is sheer absurdity.”²⁵

4. Conclusion

4.1 Conflicts between the ‘religious freedom’ acts and Indian law

A detailed analysis of the Acts reveals that far from promoting or protecting religious freedom, they have served to undermine the religious freedom guarantees under Article 14, 19, 21, 25 and 26 of the Indian Constitution and international law and covenants to which India is signatory.

These laws currently limit religious freedom of as many as 175 million people who live in the states of Orissa, Madhya Pradesh, Chhattisgarh, Gujarat and Himachal Pradesh. Moreover, this legislation has also been emulated by India’s neighbors Nepal and Bhutan and considered by Sri Lanka.

Primarily motivated by a religious ideology, the anti-conversions laws fail to achieve the very purpose for which they have been enacted. On the contrary, they provide an opportunity to divisive forces within the country to target the constitutionally protected rights of minority groups and pose a serious threat to the free practice and propagation of religious beliefs.

India’s civil society, judiciary, legislature and executive, as well as the international community, need to work towards the repealing or striking down of these laws as they threaten not only the Indian ethos of tolerance and communal harmony but also set a dangerous precedence for other nations in the area of religious freedom.

4.2 Recommendations

4.2.1 To the government of India

- Although maintenance of public order is a state responsibility, the central or federal government should issue an advisory to the state governments to repeal the anti-conversion laws;
- The Ministry of Home Affairs should provide training on human rights and religious freedom standards and practices to the state and central police and judiciary;
- Ensure that every state has an active commission for human rights and commission for minorities, and that members of these commissions are appointed by transparent and non-partisan procedures;

²⁵ *Raipur’s one-way conversion street*, Dutt, Avinash (Tehelka, Sep 02 , 2006) http://www.tehelka.com/story_main19.asp?filename=Ne090206Raipurs_one.asp.

- The Law Commission of India should be assigned to conduct a research on the premise, impact and misuse of the Acts in each state;
- Increase opportunities for dialog between leaders of religious communities, legal experts and civil society representatives to address any allegations of improper conversions in the states with anti-conversion laws.

4.2.2 To international organizations and India's foreign partners

- Raise religious freedom concerns the anti-conversion laws raise at the United Nations Human Rights Council Universal Periodic Review of India in 2012 and other forums.
- Urge the Indian government to reconsider the laws and bills on religious conversion as they violate human rights.

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