Introduction

I

Why do you get afraid the moment divorce is mentioned? Why do you think your women will leave their homes and run to courts?

—Uma Nehru to N. C. Chatterjee and Nandlal Sharma
Lok Sabha Debates on Hindu Marriage Bill, 2 May 1955.

Their 'fears', it appears, were somewhat realized as in the decades to come women not only took their husbands but also the very provisions of divorce under Hindu, Muslim, and Christian personal laws to courts, provoking polarizing political debate.

Rights of women, of minorities, questions of secularism, and constitutionalism dominated the political and judicial discourses in independent India. Assigning meanings to these terms produced contestations which were formative of India's democracy. Family law, arguably the most visible sphere of such contestation, emerged as a particularly hospitable arena for conversations between religious and legal regimes. As the Indian state attempted to confront its discomfort with divorce, it entered into intimate dialogue with citizens, which was largely mediated through religion. Personal law, therefore, played a key role in determining the legal place for religion and the content of secularism in India's democracy.

Religious personal laws refer to the corpus of family laws in India that ostensibly are religiously ordained and somewhat statutorily backed. The 'personal' in personal law could refer to the 'family'—to convey its status as a private realm beyond legal regulation. The term could also refer to religion, which as per certain idealized notions of secularism was deemed to be a private affair. The process of writing religion in statutory form, however, made both family and faith subject to public and parliamentary debates.

Personal law challenged the idea that separation between the church and the state was a precondition of democracy, as it made democracy contingent on the

protection of religious freedom and diversity. This process had three significant consequences. First, it made religion more dynamic and capacious as it could be challenged by an ordinary citizen for violating or itself being violated by 'law'. Second, it made the law responsive to, as well as suspicious of, social and religious movements as religious reform began to be routed through institutions of the state. Lastly, it rendered the courts independent and powerful, equipped to interpret religious law, align it with constitutional law, or deem it to be invalid or inessential to religion. The institutions of the state leaned on religion and custom to legitimize governmental power in the domestic realm but as a corollary, the writing of religion into statutes also made religion 'amendable'. This development signalled a simultaneous expansion of the realm of law and religion in India, encouraging also a regime of regulation and litigiousness.

The book traces the response of the legislature, the courts, and civil society movements to the idea of 'divorce' that led invariably to questions of cultural rights and abstract citizenship. The book demonstrates that the controversy on personal law has contributed to a unique evolution of both the rule of law and the doctrine of secularism in twentieth-century India. The translation of marriage and divorce laws of Hindu, Muslim, and Christian communities into statutes introduced new questions on the tenuous links between the law and the sacred, as well as on the problematic rhetoric of the reformative potential of law. Personal law therefore directed political conflict towards the legal register. The centrality accorded to the 'law' in matters of faith, family, and freedom also led to contestations over the ownership of the constitution between citizens, movements, and even within institutions of the state—legislature, judiciary, police, administration.

Centrally, this book puts forth three arguments. First, that a continuing dialogue, refinement, and adaptation of personal law in independent India over time extended the reach and authority of the state into the intimate realm of the family. It was often through religion, opposition to it or support towards it, that the state, stakeholders, and movements entered into a dialogue with the family. Second, the very processes that were aimed at governmentalizing were undermined by the continuing demands for change by movements, civil society organizations, religious organizations, judicial activism, or political agendas driven by electoral calculation. This disallowed for the imputation of any will or directionality to the state as such. Third, Indian secularism was never a coherent philosophy but evolved as a set of pragmatic principles of regulation, and a systematic study of family law can tell us more about secularism and its various invocations in practice than abstract claims to unique Indian culture and historical legacies.

The Indian constitution promises to 'endeavour to secure' a Uniform Civil Code for all its citizens throughout the territory of India.[1] This clause is encased in Article 44 of the Indian constitution as one of the Directive Principles of State Policy that enshrine the aspirations of independent India. Directive Principles, although not enforceable by law, embody constitutional morality and guide the orientation of state policies. Article 44, the shortest directive that seeks a Uniform Civil Code, does not invoke personal or family laws in any explicit manner. Yet since its introduction to the constitution in 1948, it has been summoned for a range of arguments all of which relate to the management or replacement of religious personal family laws. The desirability of a Uniform Civil Code was argued for on the grounds of 'administrative convenience' in adjudicating matrimonial suits; 'national integration' apparently threatened by diverse religious laws; 'secularism' which was deemed to be inconsistent with religious laws; or 'equality' between sexes and 'women's rights', which has been particularly emphasized in the recent decades. Opposition to a Uniform Civil Code has been premised on arguments for 'legal pluralism', 'secularism', and 'freedom of religion', which includes freedom to be governed by one's religious laws albeit in the limited sphere of 'family laws'. It is also resisted to guard against threats of majoritarianism, and questioned over uniformity's uncertain impact on women's empowerment.

Personal law became one of the central themes around which constitutional and legal discourses were shaped, and party politics organized in the second half of the twentieth century. As the commitment to a Uniform Civil Code entered electoral agendas, identity politics and religious and social movements developed around the protection of legal difference. These political processes have transformed the very nature of statutory and constitutional law, as well as the relationship between citizens and their religion in contemporary India. What emerged as Hindu, Muslim, and Christian personal law codes continued to be challenged by citizens, political parties, and democratic movements simultaneously for the institutionalization of religious practices that contradicted the fundamental rights of some and for the tenuous and questionable link that the personal law codes shared with the sacred. Yet it was through a conversation on marriage and divorce that women also routed claims of equal citizenship. This is not, therefore, a book about the law itself but about the politics of law making.

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[1] Article 44: 'The State shall endeavour to secure for the citizens a Uniform Civil Code throughout the territory of India.' Directive Principles of State Policy, Part IV of the Constitution of India.

II

Law as a Dialogue

Creative and parallel models of family law in India have attracted scholarship from various fields of gender studies, law, politics, and anthropology. This text historicizes the problem of personal law to uncover the constitutive context of the debates on uniformity and religion in post-independence India. The study hopes to contribute towards new understandings of law and its many lives, its creative use, the power dynamics it generates, and the performances it entails in the legal space and stage.

In South Asia, conventional tools to understand legal systems within democracy, through theories of social contract, or as emerging out of a 'general will', or as the command of the sovereign, collapse. One cannot completely gauge whether the power to exercise the law emanated solely from the 'state' in the form of juridical (legal-rational) authority, an elected but not necessarily representative parliament, or from a religious morality, custom, or tradition (invented or otherwise).[2] The understanding of law as an 'instrument of change' or an 'arena of conflict' also does not overcome the broad binary distinction between state and non-state, formal and informal law. Dewey's understanding of law as coercion[3] continues to find resonance as scholars fear the ever-accumulating carceral authority of the state hidden weakly behind arguments of securitization and 'enforcement' of rights.[4] However, the socio-legal anthropological studies have shown that in contemporary India, neither the sites of law nor the monopoly over violence and coercion are exclusive to the state. Even codified law is often authorized simultaneously by tradition[5] and its adjudication is chiefly shared between state and non-state forums.[6] Personal law, in particular, further pushed the definitions of law. What constitutes personal law could indeed be an 'eclectic collection of rules',[7] but these served to validate the regulatory authority of the state as well as absorb the democratic sentiment.

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[2] Max Weber, 'The Three Types of Legitimate Rule', *Berkeley Publications in Society and Institutions* 4, no. 1 (1958): 1–11; Eric Hobsbawm and Terence Ranger, eds., *The Invention of Tradition* (Cambridge: Cambridge University Press, 2012); Christopher Alan Bayly, *Recovering Liberties: Indian Thought in the Age of Liberalism and Empire*, vol. 100 (Cambridge: Cambridge University Press, 2011).

[3] John Dewey, 'Force and Coercion', *The International Journal of Ethics* 26, no. 3 (1916): 359–67.

[4] Ratna Kapur, *Gender, Alterity and Human Rights: Freedom in a Fishbowl* (Cheltenham and Northampton: Edward Elgar Publishing, 2018).

[5] Werner Menski, *Modern Indian Family Law* (Richmond: Curzon Press, 2001).

[6] Gopika Solanki, *Adjudication in Religious Family Laws: Cultural Accommodation, Legal Pluralism, and Gender Equality in India* (Cambridge: Cambridge University Press, 2011).

[7] See the 'Introduction' in Archana Parashar and Amita Dhanda. *Redefining Family Law in India: Essays in Honour of B. Sivaramayya* (New Delhi: Routledge, 2008).

This text, while it concerns itself predominantly with the story of personal law after independence, advances two further ideas. First, it forwards the idea of 'law' as a language of democratic conversation between realms of the state, between and among movements, as well as among individual actors at various sites of authority. Second, following from the idea that sovereignty is not vested solely in the Indian state,[8] this analysis hopes to break down the 'state' by situating the politics of codification in individual actors to highlight the fragmented and incoherent nature of 'statutory' law which is as malleable or as rigid as customary, informal, or formal religious law.

The tools for the regulation and creation of law and order produced by the modern nation state are a heady mix of cultural beliefs and statutory procedures that have historically influenced, or indeed been translated, from one to the other. Basu, in her work on domestic violence and the workings of a family court, illustrated that courts and law enforcement venues only partially constitute 'law' in any given society.[9] Basu, De, Denault, and Newbigin, in colonial and postcolonial contexts, have focussed on the users of law who are often capable of ascribing new meanings and interpretations to the law, and show potential to generate new legal norms and strategies from social and cultural contexts.[10] On some occasions, legal norms are made to fit cultural needs, and on others, cultural norms are sought to be institutionalized which favour's a Hobbesian understanding of law, that is, that it generates disputes as much as it resolves them. Menski, Masaji, and Griffiths, through very distinct methodologies, also suggest that at no point are cultural and traditional beliefs replaced wholesale by statutes and codes,[11] and the two realms of official and unofficial law[12] may even maintain semi-autonomy of legal and normative orders.[13] Eckert argues precisely the opposite to show how state

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[8] Thomas Blom Hansen and Finn Stepputat, 'Sovereignty Revisited', *Annual Review of Anthropology* 35 (2006): 295–315 and Shalini Randeria, 'The State of Globalization: Legal Plurality, Overlapping Sovereignties and Ambiguous Alliances between Civil Society and the Cunning State in India', *Theory, Culture and Society* 24, no. 1 (2007): 1–33.

[9] Srimati Basu, *The Trouble with Marriage: Feminists Confront Law and Violence in India*, vol. 1 (New Delhi: University of California Press, 2015); Srimati Basu, 'Playing Off Courts: The Negotiation of Divorce and Violence in Plural Legal Settings in Kolkata', *The Journal of Legal Pluralism and Unofficial Law* 38, no. 52 (2006): 41–75.

[10] Basu, *The Trouble with Marriage*; and Eleanor Newbigin, Leigh Denault, and Rohit De, 'Introduction: Personal Law, Identity Politics and Civil Society in Colonial South Asia', *The Indian Economic and Social History Review* 46, no. 1 (2009): 1–4.

[11] Menski, *Modern Indian Family Law*; Werner Menski, *Hindu Law: Beyond Tradition and Modernity* (New Delhi: Oxford University Press, 2008).

[12] Masaji Chiba, 'Legal Pluralism in Sri Lankan Society: Toward a General Theory of Non-Western Law', *The Journal of Legal Pluralism and Unofficial Law* 25, no. 33 (1993): 197–212.

[13] John Griffiths, 'What Is Legal Pluralism?', *The Journal of Legal Pluralism and Unofficial Law* 18, no. 24 (1986): 38.

norms 'adapt' to, and are shaped by, situational interpretations. Over a period, such laws have the potential to inform notions of 'common sense' in a society.[14] Both arguments nevertheless demonstrate the flow of ideas between official and non-official realms of law.

Others have understood the law as culture and power,[15] as a discursive idea which recognized that the law was capable of conferring permanence to power relations and contains within it the means for resisting and dismantling those very structures. These writings capture the negotiations of power while acknowledging the unequal terms of the debate—making law appear simultaneously empowering and coercive.[16] Such an analysis also presents a challenge to how subaltern histories have so far been written. It shows how marginal subjects rely on legal remedies that in many ways restate and reaffirm the 'hegemonic norm',[17] but phrasing demands in the requisite legal languages could also potentially allow for the satisfaction of personal notions of justice and retribution. In the case of personal law, the use of law by the state to create a space for religion, aimed ultimately at regulation, has a Foucauldian feel. Yet India is also often described as one of the least governmentalized societies, where the state does not have the monopoly over violence or religion.[18] The debate on personal law also allows citizens' groups and religious or issue-based collectives to extract and wield power, challenge dominant and majoritarian narratives, and to twist, use, subvert, influence, and strengthen the law. As Redding puts it, the law is more uncertain than fixed, clear, and predictable.[19]

Ethnographic studies suggest that laws are not simply established top-down but also bottom-up, and made a case for inter-legality[20]—interpenetration between different normative orders.[21] This inter-legality also meant that meanings and interpretations of religious texts as well as constitutional values such as secularism

[14] Julia Eckert, 'From Subjects to Citizens: Legalism from Below and the Homogenisation of the Legal Sphere', *The Journal of Legal Pluralism and Unofficial Law* 38, nos. 53–4 (2006): 45–75.

[15] See Geertz in Basu, 'Playing Off Courts'. Franz von Benda-Beckmann, 'Who's Afraid of Legal Pluralism?', *The Journal of Legal Pluralism and Unofficial Law* 34, no. 47 (2002): 37–82.

[16] Basu, 'Playing Off Courts'.

[17] Mindie Lazarus-Black and Susan F. Hirsch, eds., *Contested States: Law, Hegemony and Resistance* (London: Routledge, 2012).

[18] Hansen and Stepputat, 'Sovereignty Revisited'.

[19] Jeffery A. Redding, *A Secular Need: Islamic Law and State Governance in Contemporary India* (Seattle: University of Washington Press, 2020).

[20] Mengia Hong Tschalaer, *Muslim Women's Quest for Justice* (New Delhi: Cambridge University Press, 2017).

[21] Santos in Tschalaer, *Muslim Women's Quest for Justice*, 185. Katherine Lemons, *Divorcing Traditions: Islamic Marriage Law and the Making of Indian Secularism* (Ithaca, NY: Cornell University Press, 2019).

remained fluid and differed in meaning and import across adjudication forums. The ideas of rights, retribution, and justice are instead informed by the actors engaging the law.[22] The diversity of women's strategies in the face of changing political regimes, legal and non-state instruments has been exceptionally well documented in recent scholarship.[23] Solanki shows that the formal legal and non-state institutions often shared the adjudication of family law.[24] Tschalaer's study builds on this to illustrate that this inter-legality also emphasizes that the sites of law making and adjudication become not only spaces for meaning-making[25] but also enable translation of cultural struggles to legal ones, pushing legal disputes towards culturally acceptable solutions. Many of these writings provide 'thick descriptions' of how the law plays out and its usage, but this text focuses more on the ideas, processes, and events go into its making. This book's focus on the politics of codification is precisely to historicize the significant anthropological interventions in family law that highlight the interconnections between state and non-state legal sites.

The inter-legality visible in the domain of family law not only removes statutory law from its pedestal of being a 'means to an end' or holding immense 'reformative potential' but also counters the simplified criticism of law and legislation as solely carceral and regulatory that does not acknowledge the politics behind the codification. A dialogue on what should be codified is not limited to a conversation between state actors and institutions alone, but frequently utilized by individual women or women's organizations to negotiate and bargain within the family, with political parties, and with religious orthodoxy. How women engaged with the law—state, non-state, formal, or informal—fit no particular pattern and this has also encouraged a debate on religious and secular feminism. Neither modern secularism, religious movements nor forms of religious nationalism can solely determine the forms of politics and resistance the users of religious personal law may generate.

New postcolonial scholarship has countered elite histories by capturing the life of the law as experienced by its users; this study, however, shifts its focus back to the study

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[22] Ajantha Subramanian, *Shorelines: Space and Rights in South India* (Stanford, California: Stanford University Press, 2009).

[23] Tschalaer, *Muslim Women's Quest for Justice*; Solanki, *Adjudication in Religious Family Laws*; Basu, *The Trouble with Marriage*; Lemons, *Divorcing Traditions*; Redding, *A Secular Need*; Sylvia Vatuk, *Marriage and Its Discontents: Women, Islam and the Law in India* (Women Unlimited, an associate of Kali for Women, 2017); Nida Kirmani, 'Claiming Their Space: Muslim Women-led Networks and the Women's Movement in India', *Journal of International Women's Studies* 11, no. 1 (2009):72–85; and others.

[24] Solanki, *Adjudication in Religious Family Laws*; Tschalaer, *Muslim Women's Quest for Justice*.

[25] Lila Abu-Lughod, 'The Romance of Resistance: Tracing Transformations of Power through Bedouin Women', *American Ethnologist* 17, no. 1 (1990): 41–55.

of state institutions and actors but views these as equally diverse, disaggregated entities. The uncertain state responds to the users of the law not in one voice but in multiple often contradictory ways and embodies and absorbs their biases and aspirations. This book explores the behaviour of state actors (often as individuals) to the pressures of religious movements, religious nationalism, or women's rights activism.

Gender remained the entry point for state intervention in personal law. There is a significant body of work that recognizes the reformative potential of law. How the potential of law is theorized is itself historically contingent. Scholarship in the 1970s was particularly hopeful of the law's emancipatory potential and the women's movement was also primarily led by academics who often interfaced with public policy. In some sense, the very turn to religious feminism in the past two decades, particularly for minority religions in India, can be mapped on to historical processes and events such as the rise of religious nationalism or judicial activism which impacted women's relationship with the law. This book builds on the rich and abundant scholarship on women's relationship with religion,[26] law,[27] and the state,[28] and also contextualizes some of these writings to demonstrate how the scholarship itself has moved from defending legal protections against religious practices to a firm critique of the law[29] over the last seven decades and is reflective of change in the political context in India.

Women and the Law

Personal laws have primarily attracted scholarship because a number of these laws, or the practices preserved as such, compromised women's rights as citizens.[30] An unequal share in the property or unequal rights to divorce were some of the axis on which women's fundamental or constitutional rights and religious laws emerged as irreconcilable in popular discourse.

Feminist writing of the 1950s identified how women remained beneficiaries rather than stakeholders in matters of policy. A study of five-year plans and

[26] Saba Mahmood, *Politics of Piety: The Islamic Revival and the Feminist Subject* (Princeton, NJ: Princeton University Press, 2011); Sylvia Vatuk, 'Islamic Feminism in India: Indian Muslim Women Activists and the Reform of Muslim Personal Law', *Modern Asian Studies* 42, nos. 2–3 (2008): 489–518.

[27] Ratna Kapur and Brenda Cossman, *Subversive Sites: Feminist Engagements with Law in India* (New Delhi: Sage Publications, 1996), 63–5.

[28] Zoya Hasan and Ritu Menon, *Unequal Citizens* (New Delhi: Oxford University Press, 2006).

[29] Flavia Agnes, 'Protecting Women against Violence? Review of a Decade of Legislation, 1980–89', *Economic and Political Weekly* 27, no. 17 (1992): WS19–WS33.

[30] Hasan and Menon, *Unequal Citizens*; Archana Parashar and Amita Dhanda, *Redefining Family Law in India: Essays in Honour of B. Sivaramayya* (New Delhi: Routledge, 2008); Flavia Agnes, *Family Law: Vol. 1. Family Laws and Constitutional Claims* (New Delhi: Oxford University Press, 2011).

labour archives reveals systemic barriers that precluded women from the public sphere and many policy initiatives identified the family as women's primary priority. In the 1970s, with the rise of autonomous women's movements, there was an enhanced focus on the reformative potential of the law to challenge social injustices. Women scholars and academics partook in policy debates and Vina Majumdar and Lotika Sarkar's contribution in shaping Law Commission reports is well acknowledged.[31] Lawyer-led activism and writing recognized the limits of the law but considered an engagement with the law as inevitable. While legal scholarship has relied on case law as their major archive, it has nonetheless successfully challenged the notion that personal laws were premised on the ostentatious divide between the public and the private spheres. Such a divide concealed the discrimination against women as private family matters.[32] Scholarship on women's rights called for the politicization of the personal sphere calling out hierarchies and discrimination within the family and, in particular, in marriage that prevailed under the garb of religion, culture, custom, or faith.[33]

Significantly, studies have also shown that religious practices that were accorded an 'inviolable' status in personal law codes contained 'eclectic rules'[34] or 'invented and tamed traditions',[35] rather than 'essential' practices of religion. The defence of personal laws as 'religious freedom' has mostly been dismissed in feminist scholarship as a form of cultural relativism,[36] but after the 1980s, many scholars have begun to treat separate law codes as a necessary recognition of religious differences. The acceptance of heterogeneity does not require women to choose between their religious identities

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[31] Rukmini Sen and Saptarshi Mandal. 'Indian Feminisms, Law Reform and the Law Commission of India: Special Issue on Honour of Lotika Sarkar', *Journal of Indian Law and Society* 6, no. 2 (2014): XI.

[32] Ratna Kapur, ed., *Feminist Terrains in Legal Domains: Interdisciplinary Essays on Women and Law in India* (New Delhi: Kali for Women, 1996); Rajeshwari Sunder Rajan, *The Scandal of the State: Women, Law, and Citizenship in Postcolonial India* (Durham and London: Duke University Press, 2003).

[33] The early feminism of Wollstonecraft and the suffragette movement challenged the public–private divide but it was the second wave of feminism which introduced questions of equality-versus-difference feminism that challenged the unequal terms on which the women entered the public sphere. Radical feminism, Marxist and socialist, queer, and Third-World feminism also problematized the neat divisions between male and female. For an overview, see also A. M. Jaggar, *Feminist Politics and Human Nature* (Totowa: Rowman and Littlefield, 1983).

[34] Parashar and Dhanda, 'Introduction', in *Redefining Family Law in India*, xi.

[35] See chapter 3, 'Taming Custom', in Julia Stephens, *Governing Islam: Law, Empire, and Secularism in Modern South Asia* (Cambridge: Cambridge University Press, 2018).

[36] Zoya Hasan, *Forging Identities: Gender, Communities, and the State* (Oxford: South Asia Books, 1994).

and constitutional rights.[37] The unanimous and repeated rejection of a Uniform Civil Code by contemporary feminist scholarship is a recognition of the significance of religion to identity and selfhood. Global debates on Islamic feminism in particular have recognized important differences between women identifying as Islamic or Muslim feminists.[38] Mahmood's work also shows piety as potentially public and even political means to an end. Vatuk, among others in the Indian context, has also shown that women who often exercise agency in religious adjudication forums may not always self-identify as feminists. Kirmani, building on Spivak, suggests that women also apply 'strategic essentialism' to identify with their community as well as lean on state remedies in specific circumstances.[39]

The contemporary near-consensus within the Indian women's movement on preserving separate personal laws, particularly those of religious minorities, is also prompted by the rise of Hindu nationalist politics in the 1980s and 1990s, which usurped the agenda of bringing uniformity in personal laws. The impact of Hindu nationalism on the debates on Muslim personal law has been well documented in scholarship.[40] Whether at all a legal intervention would address problems generated

[37] Gopika Solanki, 'Beyond the Limitations of the Impasse: Feminism, Multiculturalism, and Legal Reforms in Religious Family Laws in India', *Politikon* 40, no. 1 (2013): 83–111; Nivedita Menon, 'State/Gender/Community: Citizenship in Contemporary India', *Economic and Political Weekly* 33, no. 5 (1998): PE3–PE10; Flavia Agnes, 'The Supreme Court, the Media, and the Uniform Civil Code Debate in India', in *The Crisis of Secularism in India*, ed. Anuradha Dingwaney Needham and Rajeswari Sunder Rajan (Ranikhet: Permanent Black, 2009), 294–315; Farrah Ahmed, *Religious Freedom under the Personal Law System* (New Delhi: Oxford University Press, 2016).

[38] Valentine M. Moghadam, 'Islamic Feminism and Its Discontents: Toward a Resolution of the Debate', *Signs: Journal of Women in Culture and Society* 27, no. 4 (2002): 1135–71.

[39] Kirmani, 'Claiming Their Space', 75.

[40] Menon, 'State/Gender/Community'; Siobhan Mullally, 'Feminism and Multicultural Dilemmas in India: Revisiting the Shah Bano Case', *Oxford Journal of Legal Studies* 24, no. 4 (2004): 671–92; Zoya Hasan, 'Gender Politics, Legal Reform, and the Muslim Community', in *Appropriating Gender: Women's Activism and Politicized Religion in South Asia*, ed. Patricia Jeffery and Amrita Basu (New York: Routledge, 1998), 71–88; Z. Pathak and R. S. Rajan, 'Shah-Bano', *Signs* 14, no. 3 (1989): 558–82; Thomas Blom Hansen, 'Globalisation and Nationalist Imaginations: Hindutva's Promise of Equality through Difference', *Economic and Political Weekly* 31, no. 10 (1996): 603–16; Sikata Banerjee, 'Armed Masculinity, Hindu Nationalism and Female Political Participation in India: Heroic Mothers, Chaste Wives and Celibate Warriors', *International Feminist Journal of Politics* 8, no. 1 (2006): 62–83; Arvind Rajagopal, *Politics after Television: Hindu Nationalism and the Reshaping of the Public in India* (Cambridge: Cambridge University Press, 2001); P. S. Ghosh, *BJP and the Evolution of Hindu Nationalism: From Periphery to Centre* (New Delhi: Manohar Publishers, 1999); Ashutosh Varshney, 'Contested Meanings: India's National Identity, Hindu Nationalism, and the Politics of Anxiety', *Daedalus* 122, no. 3 (1993): 227–61; David E. Ludden, ed., *Making India Hindu: Religion, Community, and the Politics of Democracy in India* (Oxford: Oxford University Press, 2005); Angana P. Chatterji, Thomas Blom Hansen, and Christophe Jaffrelot, eds., *Majoritarian State: How Hindu Nationalism Is Changing India* (London: Hurst & Co., 2020).