

# Acts of Violence? Anti-Conversion Laws in India

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## Abstract

Extant scholarship on anti-Christian violence in India is scant and predominantly focuses on physical violence. To address this gap, this article explores Freedom of Religion laws (also referred to as anti-conversion laws) as an example of structural violence faced by India's Christians. Thus far, scholars have studied these as a constitutional violation that denies a Christian's freedom of religion. Using Johan Galtung's violence framework, this article seeks to recast these laws as a form of structural violence against Christians. In doing so, it will show how Hindutva's anxieties about the demographic and political 'Christian threat' have become embedded into the law. Through an exploration of the southern state of Karnataka, where the Protection of Right to Freedom of Religion was passed in 2022, this article seeks to show how this structural violence interacts and reinforces forms of direct and cultural violence, creating a system of anti-Christian violence designed to maintain India's 'Hindu majority'.

## Keywords

Violence, Hindutva, Christians, conversion, anti-conversion laws

## Introduction

Recent scholarship has portrayed India's slide from a liberal democracy to an 'ethnic democracy' (Jaffrelot, 2021) or an 'ethnocracy' (Roy, 2021, see IR 'The Rule of Law in an

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Ethnocracy' in this special issue), revealing the dominance of the Hindutva ideology in India's current social and political life. Hindutva conceptualises the nation as a land of Hindus. On the other hand, Muslims and Christians are excluded and portrayed as 'outsiders' and 'enemies' who pose a cultural and demographic threat to the 'Hindu' nation. This democratic backslide has accelerated since the ascension of the Bharatiya Janata Party and Prime Minister Modi to office in 2014. Nielsen and Nilsen (2021) suggest that this majoritarian cultural nationalism was spread in Modi's first term between 2014 and 2019 through the proliferation of anti-minority hate speech and violence by Hindutva-inspired vigilante groups. However, since 2019, significant steps have been taken to embed this into the law at the state and national level (while the violence and hateful rhetoric continue). The amendment to the Citizenship Act to allow refugees of all religions (except Islam) from neighbouring countries to become Indian citizens (see IR 'The rule of law in an ethnocracy' in this special issue for an in-depth case study), and the removal of statehood of Kashmir, India's erstwhile only Muslim-majority state, bringing it under the control of the Central government serve as examples of this on the national level.

At the state level, a new wave of 'Freedom of Religion' laws (subsequently referred to as anti-conversion laws) has been passed. This article argues that these laws represent a more holistic approach to tackling the 'Christian threat' by limiting the perceived problem of 'conversions' away from Hinduism towards Christianity, and thereby, maintaining India's 'Hindu' majority. Thus far, scholars have studied these laws as a discriminate constitutional violation which deprives an individual of the freedom to practice their religion (Jenkins, 2008; Coleman, 2008; Bhat, 2021; see also YS and LJ 'Legislation as Disinformation' for a discussion of the legacy of these laws). Others have noted the additional potency of these laws which stems from their ability to act as a form of 'dog-whistle legislation' to support and encourage the work of Hindutva-inspired vigilante groups in the country (Nilsen, Selvaraj and Nielsen, 2024). Drawing on Johan Galtung's tripartite conception of violence (which includes direct, structural and cultural violence), this article furthers this scholarship to suggest that anti-conversion laws constitute a form of violence, particularly structural violence against Christians. Galtung's framework allows a more nuanced understanding of the experience of anti-Christian violence in the country by moving beyond actor-oriented conceptions and shedding light on the structural forms, and the justifications for them. Beyond the recognition of multiple forms of violence, Galtung's framework allows us to see the interconnections between them. Showing these connections helps make structural and cultural violence more visible and directs our political action to the ways in which these forms travel and transform. As an illustrative case, this article will consider the system of anti-Christian violence in the southern state of Karnataka which passed the *Protection of Right to Freedom of Religion Act* in 2022. Beyond just the law, the case sheds light on the extra-judicial involvement of vigilante groups in justifying the need for and enforcement of these laws which has unfolded in the state over the past 15 years.

The analysis for this article draws from a wide range of data. It includes a close reading of all state anti-conversion legislation which has been passed in India, related Supreme Court Rulings and related government reports such as the Niyogi Commission report. To expound on the system of anti-Christian violence in Karnataka, government and civil society reports, and media reports have been used. These data were complimented

by qualitative interviews with Christian leaders, lawyers, and activists which took place in Bangalore and New Delhi in 2018.

The article will first elaborate on Hindutva's understanding and depiction of India's Christians as a demographic and political 'threat'. Next, the article will show how this portrayal has become embedded into India's law in three escalating phases with the political and social growth of the Hindutva movement in India. Finally, using Galtung's violence triangle, the article reconceptualizes these laws as a form of structural violence using Karnataka as an illustrative case to demonstrate the existence and interconnectedness of these forms of violence in a system of violence.

### *Hindutva's Conception of India's Christians*

Hindu nationalist anxieties about Christians began to cohere in the 1880s, following the British Raj's support for Christian missionary work and gained momentum with the onset of the decadal census and the British support for separate electorates in the early 1900s. V.D. Savarkar coined the term Hindutva in his 1923 tract, *Hindutva: The Essentials of Hinduism*, where he conceptualised the nation as a land of Hindus. As Jaffrelot (1996) points out, this conception 'marked a qualitative shift change in Hindu nationalism, aspects of which had previously been combined in a loose ideology, but which had now acquired a more systematic exposition' (p. 32). Sarvarkar's key priority was to inspire unity amongst Hindus, who he feared would be wiped out by Muslims and Christians amidst tides of ongoing global politics. In addition to British colonialism, Sarvarkar's ideas could be seen as a response to the growing Khalifat movement in the early 1920s. In his conception, Savarkar includes followers of Indic religions such as Hinduism, Buddhism, Sikhism, and Jainism as having *Hindutva* (the essence of Hinduism) (p. 50). Conversely, Muslims and Christians were viewed as 'outsiders' of the nation as they owed their allegiance to a different *punyabhoomi* (Holyland) despite sharing a common *Pitrabhoomi* (Fatherland). Writing about Muslims and Christians, Sarvarkar says:

Their mythology, Godmen, ideas, and heroes are not the children of this soil. Consequently, their names and their outlook smack of a foreign origin. Their love is divided. Nay, if some of them be really believing what they profess to do, then there can be no choice – they must set their Holy-land above their Fatherland in their love and allegiance. (Sarvarkar, 1938, p. 39)

As Iqtidar (2021) suggests, Sarvarkar's insistence on the religious and national homeland being the same was to make Muslims and Christians simultaneously both models to be emulated and the enemies to be mobilised against. Iqtidar suggests that Sarvarkar needed to define very clearly an attribute which Muslims and Christians could never acquire in their claim to India (p. 119). That attribute was the location of a community's holy lands and, therefore, their loyalty. Since Muslims and Christians could not claim that, they were left without a patina of forgiveness by Sarvarkar who cast them outside the true 'nation'.

Sarvarkar's ideas served as the guiding force of the Rashtriya Swayamsevak Sangh (RSS), an organisation which has sought to embed the Hindutva ideology into India's social consciousness since 1925. Influential RSS ideologue and longest-serving

supreme leader M.S. Golwalkar furthered Sarvarkar's conception of the nation to vilify Muslims and Christians. He wrote in 1947 that those who do not 'glorify the Hindu race and Nation next to their heart' are 'traitors and enemies to the National cause, or, to take a charitable view, idiots' (p. 100). As such, Golwalkar argues that these 'idiots' had two options – integration with the nation or enjoy a diminished existence while residing within it, living merely as 'outsiders, bound by all the codes and conventions of the Nation, at the sufferance of the Nation and deserving of no special protection, far less any privilege or rights' (pp. 103–104). This quote provides early signals of the RSS disposition to Christians becoming second-class citizens within India.

Since then, the Hindutva movement has developed and perpetuated a well-formulated notion of India's Christians as a 'threatening other' to the nation. The threat is expressed with reference to a number of multi-faceted themes, primarily represented by the term 'conversions', and encompasses demographic, political and social anxieties. Conversions away from Hinduism to Christianity are linked to anxieties about the 'dying Hindu race', which emerged with the publication of the decadal census in the late 1880s. Lt. Col. Mukerji, a civil servant in Bengal, demonstrating fears over the 'dying Hindu race', wrote, 'We [Hindus] are also a dying race. Every census reveals the same fact...Why should it be so?' (Mukerji, 1929, pp. 4–5).

Dalits (formerly known as untouchables) and Adivasis (indigenous communities) occupy a precarious place within the Hindutva imagination. Representing an estimated 24% of India's population (as of 2011), they are essential to maintaining the 'Hindu' majority in the country, yet they have been historically marginalised within Hindu society (Zavos, 2001, p. 73). Notably, India's Christian population is believed to comprise 70% Dalits and 20% Adivasis. While scholars note the exercise of their agency in converting to Christianity to escape systematic oppression (Cederlof, 1997; Roberts, 2016), proponents of Hindutva portray them as 'gullible' and easily susceptible to conversion away from Hinduism and therefore, 'targets' of Christian conversion (Jenkins, 2008).

Relatedly, the wide network of Christian missionary work (often derogatorily reduced to 'conversions') is perceived and portrayed as being part of a larger global expansion strategy of Western Christian countries in their efforts to destabilise India's internal security. Within this imagination, India's Christians are perceived as agents of the West who live in India. While the initial preoccupation centred around British colonialism, it was expanded with the geo-political dominance of the U.S. as a perceived 'Christian' nation. Consequentially, the vast network of missionary work in India is portrayed as being nefarious, relying on 'force', 'fraud', and 'allurement'. Historian and RSS member Prof. Shripati Shastri, in a speech titled, *Christianity in India: A Retrospect* said:

The Christians of India are converts or descendants of converts whose conversion had been secured during some period of history by force or fraud; conversion by persuasion is a rarity...Most of the converts have been victims of threats, allurements, financial stringency, ignorance, deception and persecution. The less said, the better about the role of the sword in securing recruits for the gospel. It is an ugly past... On more sophisticated levels, they run schools and dispensaries, asylums and orphanages and engage in so-called social work. Since the basic motive is proselytisation or creating congenial climate for proselytisers, these services are tainted and poisoned. (Shastri, 1983, pp. 14–15)

Beyond just the articulation of this threat in public discourse, Hindutva proponents and sympathisers articulate the need to control this Christian ‘threat’. As I will argue in the remaining sections of this article, this conception has been frequently deployed to justify the need for anti-conversion laws in India. In doing so, they have embedded Hindutva’s understanding of India’s Christians in the law. As this analysis will show, proponents of the Hindutva ideology are not restricted to members of the RSS, its political affiliate the BJP, and other organisations like the Vishwa Hindu Parishad and Bajrang Dal. At times, the ideology has been deployed by members of ‘secular’ parties such as the Indian National Congress and members of India’s democratic institutions like the Supreme Court.

### *A History of Anti-Conversion Legislation in India*

Anti-conversion legislation has a long history in India dating back to pre-independence, where they were present in at least 12 Princely States (Sen, 2019, p. 114; see also YS and LJ ‘Legislation as Disinformation’ in this special issue). National-level freedom of religion legislation was contemplated in the early years of Independent India. These included the *Indian Conversion (Regulation and Registration) Bill* in 1954, the *Backward Communities (Religious Protection) Bill* in 1960, and the *Freedom of Religion Bill* in 1979, which were introduced in Parliament, but failed to pass due to lack of political support (Ahmed, 2018, pp. 2–3). However, being an issue of ‘public order’, the passing and implementation of these laws have been deemed a state (a sub-national unit) rather than a national prerogative as per the 1977 *Rev. Stainislaus vs the State of Madhya Pradesh*. At present, anti-conversion legislation has been passed in 12 Indian states.

A significant milestone in this history was the commissioning of the 1956 *Report on Christian Missionary Activities* (also known as the Niyogi Commission report) by the Indian National Congress-led Madhya Pradesh government. As shown below, the report’s ‘findings’ parroted Hindutva’s anxieties about Christianity, discussed earlier. The report advocated for ‘suitable control on conversions brought about through legal means,’ suggesting that if necessary, ‘legislative measures should be enacted’ (p. 160).

A significant portion of the report focused on the ‘foreign hand’ at work in the development and functioning of Indian Christianity, with India’s Christians being portrayed as agents of the West intent on interfering in India’s affairs. The primary focus was the United States and the suspicion of ‘some ulterior political or extra-religious motive, in the influx of foreign money for Evangelistic work in its varied forms’ (p. 3). It went on to say that missionary work in India appeared to be

...part of the uniform world policy to revive Christendom for re-establishing Western supremacy and is not prompted by spiritual motives. The objective is to create minority Christian pockets with a view to disrupt the solidarity of the non-Christian society and mass conversions of a considerable section of Adivasis [tribals] with this ulterior motive is fraught with danger to the security of the state. (p. 132)

This was particularly concerning in a fledgling country because the region was comprised mainly of partially Christianized tribals who had been demanding statehood since the

1940s. As noted earlier, the Adivasis in the region were described as being hapless in the face of Christian evangelisation because ‘conversion muddles the convert’s sense of unity and solidarity with his society’ and could lead to a ‘danger of his loyalty to his country and State being undermined’ (p. 131).

Reiterating the portrayal that ‘conversions’ were taking place nefariously, the report said that the ‘conversion of illiterate aboriginals and other backward people [Dalits] was effected by the Christian Missionaries either forcibly or through fraud or temptations of monetary gain’ (p. 1). The report went on to say that Adivasis and Harijans [Dalits] were identified as ‘special targets of aggressive evangelisation’ because ‘no adequate provision of hospitals, schools, orphanages and other social welfare services in the scheduled or specified area’ (p. 130). To this effect, the report said that the ‘non-Christian side’ objected that ‘illegitimate methods’ were adopted, such as ‘offering allurements of free education and other facilities to children attending their schools’, ‘marriages with Christian girls’, ‘money lending’, and ‘offering prayers in the wards of in-door patients’ (p. 3). In doing so, it portrayed these institutions as having the sole intention of ‘conversion’ rather than any other positive developmental objective.

The report served as the legal justification for the need for anti-conversion laws in the country, which have now been passed in 12 Indian states in three escalating waves. The first wave started with the passing of the *Orissa Freedom of Religion Act* (in 1967) by the Swatantra Party and the *Madhya Pradesh Freedom of Religion Act* (in 1968) by the Indian National Congress. Both laws sought a ‘prohibition of conversion from one Religion to another by the use of force or inducement or by fraudulent means’. The poor definition of these phrases provides scope for misinterpretation and, therefore, potential bias in implementation (Sahoo, 2018, pp. 69–70; see also YS and LJ’ Legislation as disinformation’ in this special issue). For example, ‘fraud’ could easily include the Christian metaphysical teaching of the afterlife since it cannot be proven to exist. ‘Allurement’ could imply admission or subsidisation of any of the wide range of educational or medical services the Christian community offers around the country. These laws further provide for a higher penalty for ‘converting’ a member of a ‘minoritised’ group within Hinduism, such as Dalits, Adivasis, women and children (Jenkins, 2008, p. 109).

In 1977, the constitutional validity of the Orissa and Madhya Pradesh legislation was challenged in courts on the grounds that it violated Indian secularism and the freedom of religion in India. While the Orissa legislation was ruled unconstitutional in the *Yulitha Hyde v. The State of Orissa* case (1972), the *Rev. Stainislaus v. State of Madhya Pradesh* case (1977) upheld the Madhya Pradesh legislation. The constitutionality of these laws will be further discussed later in the article.

This ruling served as an immediate impetus for the north-eastern state of Arunachal Pradesh to enact its anti-conversion legislation in 1978. A notable innovation in this legislation was the suggestion that ‘reconversion’ to the ‘religion of one’s forefathers’ (read as Hinduism) was exempt from the law (Ahmed, 2018, p. 14). Following this law, the conversation on conversions saw a lull in national discourse.

The second wave of these laws emerged in the late 1990s and coincided with the BJP’s emergence as a political force on the national stage. During this period, Hindu nationalist organisations ‘turned their attention’ away from Muslims and towards Christians (Bhatt,

2001, p. 198). The period was marked by the proliferation of physical attacks against Christians in the country, including large-scale violence in the Dangs region of Gujarat in 1998 and the murder of Australian missionary doctor Graham Staines and his two sons in Orissa in 1999. Following a visit to the sites of the Dangs violence, BJP Prime Minister Vajpayee called for a 'national debate on conversions' (Dugger, 1999). This period was also marked by a proliferation of literature by Sangh Parivar members articulating the 'Christian threat'. This included BJP MP Arun Shourie's *Christian Missionaries in India* (1994), Hindu revivalist historian Ram Swarup's *The Hindu View of Islam and Christianity* (1995), and VHP vice-president Ashok Chowgule's *Christianity in India: A Hindutva Perspective* in 1999. This sudden 'attention' to the Christian 'threat' manifested in the passing of several anti-conversion laws in states where the BJP was in power or was an alliance partner at the national level. In 2002, BJP-ally, the All India Anna Dravida Munnetra Kazhagam passed the *Prohibition of Forcible Conversion of Religion Act* in Tamil Nadu. It was eventually repealed in 2005 due to pressure from minority groups in the state. Since then, laws have been passed in the BJP-led states of Gujarat (in 2003) and Rajasthan (in 2006). The exception was the Himachal Pradesh law in 2006 by the Indian National Congress.

The content of the laws in the second wave was broadly consistent with their predecessors. While activists and lawyers I spoke with acknowledged a 'negligible' number of convictions under these anti-conversion laws, their potency lies in the extra-judicial and often violent enforcement by organisations affiliated to the Hindutva movement (see also MB 'The irregular and the unmaking of minority citizenship' in this special issue on the increasing role of ethnocratic law in enabling vigilante action). Saiya and Manchanda (2020) argue that states which had these laws display a higher instance of anti-Christian violence than states which do not. In most cases, violence is enacted by Hindutva-aligned groups such as the Vishwa Hindu Parishad and the Bajrang Dal. These groups are also supported by the BJP-led government in the state, especially through the police (Sahoo, 2018; Saiya & Manchanda, 2020). Bauman (2008) notes that a troubling aspect of anti-conversion laws is 'how regularly witnesses become corrupted or are intimidated into changing their stories in order to exculpate criminals' (p. 37). Speaking about the hand-in-glove relationship between these organisations and the police, a lawyer-activist in New Delhi working to repeal these laws told me:

...fringe groups usually harass pastors and Congregations, disturbing their Sunday services. This is done by preventing people from entering churches or just shouting slogans such as 'Jai Shri Ram' inside the church or prayer rooms. In some cases, they destroy furniture and beat Christians gathered. When they [Christians] report this to the police, the police file cases against the Christians for conversion.

This hostile system is mainly present in states where the *Ghar Wapsi* (homecoming) campaign of organisations like the VHP is prominent. As Katju (2015) points out, *Ghar Wapsi* has been designed to tackle the problem of a declining Hindu population. Tribal and Dalit Christians are the main focus of these efforts. Rather than reinvent Hinduism to address the concerns of discrimination of minoritised groups such as

women, Dalits and tribals, Hindutva-aligned organisations engage in ‘reconversions’ to Hinduism (p. 4).

A third wave of these laws have been passed with the re-emergence of the BJP on the national stage since 2014 under the leadership of Prime Minister Modi and in several Indian states. In this wave, laws have been passed in BJP-led states of Jharkhand (in 2017) and Uttarakhand (in 2018), Karnataka and Uttar Pradesh (in 2021), and Haryana (in 2022). Further, existing legislation has been amended to become harsher in Gujarat (2021) and Himachal Pradesh (2022). The laws passed during this wave can be seen as more virulent and aim to serve as a more comprehensive limitation of the practice of a Christian’s freedom of religion than previous iterations in other states.

Let us consider the *Karnataka Protection of Right to Freedom of Religion Bill (2021)* as an example. Firstly, once again demonstrating the significant focus of these laws on ‘protecting’ minoritized Hindus, the law provided for harsher penalties if the person being ‘converted’ was from a minoritized Hindu group. The legislation imposes stronger imprisonment and a financial penalty of up to 10 years and a Rs. 50,000 if the person being ‘converted’ was a Dalit, Adivasi, woman or child. It would be three years and Rs. 25,000 otherwise. Significantly, under this legislation, women have become a focus of this legislative control through the inclusion of another long-standing Hindutva preoccupation, ‘Love Jihad’, the accusation that (mainly) Muslim men are luring Hindu women through marriage (Nielsen & Nilsen, 2021). Much like recently passed anti-conversion legislation and ordinances in Himachal Pradesh, Uttar Pradesh and Madhya Pradesh, the Karnataka legislation prohibits ‘marriage done for the sole purpose of conversion’.

Secondly, the law has broadened the understanding of the ‘converter’ to include institutions which could face sanctions such as the withdrawal of state financial support if found to be transgressing. It further holds liable the ‘converter’ and ‘every person who aids or abets another in committing the offence’. As this is nebulously phrased, it could include anyone in the institution, including funders and advisors. This provision is particularly concerning as it aligns with the Indian government’s recent efforts to monitor and control external funding of organisations through the Foreign Contribution Regulatory Act.

The expansion of who is the ‘converter’ is particularly concerning as ‘allurement’ is broadly defined and includes ‘employment, free education in school or college run by any religious body’, ‘better lifestyle, divine displeasure or otherwise’, and ‘glorifying one religion against another religion’. In response to the passing of the Karnataka bill, the Archbishop of the Catholic Church in Bangalore said, ‘So, giving free education will also be a big problem. If I have to help a Dalit child, who can’t afford to pay the fees, I’ll have to fill a number of forms. I will have to explain why the child is being helped, and why I am offering free education’ (Kaur, 2022). Notably, the burden of proof to ascertain if a conversion took place or not by ‘misrepresentation, force, undue influence, coercion, allurement or by any fraudulent means or by marriage, lies on the person who has caused the conversion and on the abettor, who aids or abets such conversion’ not with the person who chooses to convert. This could entail cumbersome legal fees over a lengthy period to prove innocence, if accusations were levied.

Third, the Karnataka legislation links to other provisions, compounding their discriminatory nature. At present, the benefits of affirmative action in the form of reservations in



employment and education to Scheduled Castes (Dalits) are offered only to Hindu, Buddhist, and Sikh Dalits while Muslim and Christian Dalits are excluded from these benefits. However, the law incentivizes reconversion to Hinduism by providing full access to these benefits upon 'reconversion' to Hinduism, saying that 'the concerned authority shall...reclassify the person converted for his entitlement to enjoy social status or to receive economic benefits from the Government that he was getting prior to conversion'.

Fourth, provisions of this legislation further make 'conversion' a public affair. The legislation necessitates that a 30-day advance notice be given by the person wishing to convert to a competent government official who can ask for objections from the public and order a police investigation into the 'genuine intention, purpose and cause of the proposed conversion', if necessary. Notably, the 'converter' must also give a 60-day advance notice with full details of the ceremony. This provision enables and supports the extrajudicial enforcement of the laws as Hindutva-aligned vigilante groups could use these public notifications to disrupt ceremonies, as was suggested to me by activists. Thereby, the requirement for public notification could serve as a further barrier.

Similarly, after the 'conversion', the person choosing to convert must further intimate a competent government official within 30 days after the ceremony has taken place. After which the District Magistrate shall notify a wide-ranging list of 'Concerned authority{ies}' such as their employer, officials of the revenue department, social welfare department, backward classes welfare department, minority welfare department and other concerned department, urban and rural local bodies, Principals or Head Masters of the Educational Institutions, etc.' This could risk further stigmatisation, alienation and marginalisation of an individual, acting as an additional barrier.

Finally, the legislation widens the scope of who can report a 'conversion', providing that 'parents, brother, sister or any other person who is related to him by blood, marriage or adoption or in any form associated or colleague' can lodge a complaint. This is particularly concerning as a lawyer in New Delhi told me that

In a majority of cases we see now, it is the person who is affected, not the individual saying, 'I am being converted' who goes to the police. It is someone from the political end or the Sangh Parivar who are pointing fingers at pastors and others. Very rarely is the complaint being filed by the victim. And this is not questioned by the courts and police.

From this analysis, we see how legislation in this third wave represents a more comprehensive legal attempt to hinder 'conversions' to Christianity from multiple angles. As laws in one state are often used as justifications and blueprints for laws in other states, Karnataka's legislation could become a model for other states in India as the BJP continues to embed its vision of India into the law. Therefore, as the Hindutva movement continues to grow in India, it seems likely that a slew of harsher laws can be expected in the future. As the implementation of a Uniform Civil Code is being touted as a key priority of the BJP should it win a third successive term in office in 2024, we could see these laws becoming further embedded into India's political and legal structure.

## The Constitutional Validity of Anti-Conversion Laws in India

Anti-conversion laws have been challenged in the courts for violating Article 25 of India's Constitution which provides for the *Freedom of Conscience and Free Profession, Practice and Propagation of Religion*, saying that 'all persons are equally entitled to freedom of conscience and the right to freely profess, practice and propagate religion'. Notably, the term 'propagate' is interpreted differently by India's Christians, and proponents and sympathisers of Hindutva. Christians believe that the constitutionally guaranteed right of propagation, as an exposition of their beliefs is vital to the practice of their religion. As one former senior Church leader told me, 'It is our Constitutional right to preach. We are making use of it. We have received the charge to "Go ye into the world"'. On the other hand, proponents and sympathisers of Hindutva believe that this 'propagation' interferes with a Hindu's free practice of religion. For example, Swami Dayanand Saraswati of the Arsha Vidya Gurukulam conceptualises conversion as a form of 'Violence', writing that, 'It is not that they [Christians] preach their own religion. They preach against other religions. I consider that kind of preaching as violence. I want them to know that this is violence. I am hurt and many others like me are hurt. Millions are hurt' (2009, p. 24).

Through the 1977 *Rev. Stainislaus vs. the State of Madhya Pradesh* ruling, it is evident that the Supreme Court sided with the Hindutva understanding of Article 25, suggesting that these laws do not interfere with an individual's freedom of religion. The ruling said:

what the Article grants is not the right to convert another person to one's own religion, but to transmit or spread one's religion by an exposition of its tenets. It has to be remembered that Article 25 (1) guarantees 'freedom of conscience' to every citizen, and not merely to the followers of one particular religion, and that, in turn, postulates that there is no fundamental right to convert another person to one's own religion because if a person purposely undertakes the conversion of another person to his religion, as distinguished from his effort to transmit or spread the tenets of his religion, that would impinge on the 'freedom of conscience' guaranteed to all the citizens of the country alike. (India Kanoon, n.d.)

With this ruling, the term 'propagate' (previously ill-defined) was given meaning. This verdict is cited consistently to uphold the constitutional validity of anti-Conversion laws which seek to conflate the 'propagation' of religion with forceful 'conversions'. Sen (2019) argues that this verdict is representative of the Court's historical 'pro-Hindu' bias.

Currently, the *Citizens for Justice and Peace v State of Uttar Pradesh* case which challenges the Uttar Pradesh legislation is pending before the Supreme Court. Citizens for Justice, a Mumbai-based NGO, filed a writ petition to consider (1) Do the anti-conversion laws restrict the rights to choice, privacy, personal liberty, marriage, and dignity given under Article 21? and (2) Do the anti-conversion laws violate the freedoms of religion and conscience under Article 25? In their petition, the CJP relied on the case of *Shafin Jahan v. Asokan K.M.* (2018), where the Supreme Court held that the right to change religion is a fundamental right. They also relied on recent rulings such as *KS Puttaswamy v Union of India* (2017), *Shakti Vahini v. Union of India* (2018) and *Indian Young Lawyers*

*Association vs The State of Kerala* (2019), which elaborated on the role of privacy, choice and religious beliefs for maintaining dignity (Supreme Court Observer, 2021).

While *Rev. Stainislaus vs. the State of Madhya Pradesh* has been resilient so far (and still could be), the Puttaswamy ruling, which recognised privacy as a fundamental right, could be a turning point. The Puttaswamy ruling could allow at least certain provisions such as the public notifications of ‘conversion’, if not the whole, law to be declared unconstitutional. The Supreme court will also no doubt consider the Gujarat High Court ruling on the provision prohibiting conversion by marriage saying that this would interfere with the right to the choice of an individual guaranteed under the Right to Life in Article 21.

### **Acts of Violence?**

This final section seeks to build on existing scholarship to conceptualise India’s anti-conversion laws as a form of violence (particularly structural violence) against India’s Christians. This article draws on Norwegian Peace scholar Johan Galtung’s tripartite conception of violence, which includes direct, structural, and cultural violence and suggests a causal link between the three. Using the case of Karnataka, this article will demonstrate the system of violence that exists against Christians in the state and the central role which anti-conversion laws play in it.

In his seminal 1969 article, Galtung suggested that violence could emerge directly or indirectly. In its direct form, there is a clear object-subject orientation and an identifiable actor who initiates violence. It could manifest as physical violence, such as beating, murder, and rape or as psychological violence, such as threats and trauma. Indirectly, it manifests as structural violence, which is ‘built into the structure and shows up as unequal power and consequently as unequal life chances’ where ‘resources are unevenly distributed’ and are ‘available for a few groups only’ (p. 171). In another work, Galtung suggests that the centrepiece of a violent structure is exploitation, where *topdogs* get more than *underdogs* out of their interaction in the structure. He suggests that ‘underdogs’ are so disadvantaged within the system that they may die or live in a permanent state of misery (Galtung and Fischer, 2013, p. 36). Galtung suggests that structural violence could manifest as discrimination, alienation and marginalisation. Through this inclusion, Galtung sought to bring a ‘unifying perspective’ to the study of violence, suggesting that both direct and structural violence were ‘completely symmetrical’, deserving equal intention because they both cause harm and need to be addressed to establish what he calls ‘positive peace’, the absence of physically violent conflict along with the flourishing of just structures.

Later, in 1990, Galtung expanded his categorisation to include the concept of cultural violence to join direct and structural violence to become the third overarching category or ‘super-type’ of violence (1990, p. 294). He defines cultural violence as ‘those aspects... that can be used to justify or legitimise direct or structural violence’ (p. 291). Emphasising its deleterious effects, Galtung stresses that cultural violence ‘highlights the way in which the act of direct violence and the fact of structural violence are legitimised and thus rendered acceptable in society’ (p. 292). He further elaborates that cultural violence makes other forms of violence ‘look, even feel, right – or at least not wrong’

(p. 291). As Galtung concludes, 'the logic of the scheme is simple; identify the cultural element and show how it can, empirically or potentially, be used to legitimise direct or structural violence' (p. 296). Notably, Galtung's framework suggests that 'violence breeds violence' (Galtung, 1990, p. 294), implying that each form of violence could further inspire, provoke or reinforce another or itself, thus creating systems of violence.

While Galtung's framework has been critiqued for being too expansive and, therefore, diluting the conception of violence (Coady, 1986), this article argues that it better represents the range of harms (beyond merely physical ones) that India's Christians experience. Through Galtung's framework, we further see the similar devious motivations of these laws and physical violence as a means of preventing 'conversions' and maintaining the 'Hindu' majority. Finally, we can also see the material connections of these laws with physical violence, especially how it can be abused to perpetuate further physical violence against Christians, and with prolific hateful rhetoric which seeks to numb society to this physical and structural violence against Christians. By recognising this structural violence, we, therefore, can bring a greater sense of urgency to the matter and inspire political action.

As a demonstrative case, this section will explore the southern Indian state of Karnataka from 2006 to 2023 to show how anti-conversion laws work in congruence with other forms of direct and cultural violence creating a system of violence against Christians. The roots of the anti-conversion legislation in Karnataka date back to an episode of physical violence which took place in the Dakshin Kannada district in 2008, known as the 'Church Attacks'. The Karnataka chapter of the People's Union for Civil Liberties-Karnataka (PUCL-K) indicates that there were 28 incidents of physical violence against Christians across the state (primarily centred in this district) from 17th August to 21st September (People's Union for Civil Liberties, 2009, p. 54). This coincided with large-scale anti-Christian violence in Orissa. Numerous civil society and government reports noted the role of Hindutva-aligned organisations in this episode of violence, along with the lax role of the police and the state BJP government (National Commission for Minorities, 2008; National Human Rights Commission of India, 2009; Karnataka State Human Rights Commission, 2010).

The BJP state government deployed a well-coordinated campaign to justify this violence, drawing on Hindutva's historic portrayal of the Christian 'Threat' (a form of cultural violence). A significant consequence of this portrayal was the need to control this threat through the law (a form of structural violence). In a press conference following the outbreak of the Church Attacks, Chief Minister Yeddyurappa said, 'The Constitution does not allow forced conversion' (The Telegraph, 2008) and his government would commence investigating organisations who allegedly received foreign funding for 'conversions' reigniting a frequent claim that foreign Christian powers are fuelling religious tensions in India by incentivising conversions (Press Trust of India, 2008). Similarly, Karnataka's Home Minister, Dr VS Acharya averred that 'the root cause [of the violence] is the illegal conversion and publication of material ... which was obnoxious and hurtful to Hindu sentiments' (Roche, 2008). While the violence was ongoing, Acharya said that the BJP government was looking into instituting an anti-conversion law in the state to stem the Christian 'threat' (Kumar, 2008). After the episode, justifications pivoted to standard Hindutva tropes about Christians. For

example, the following year, Suresh Kumar, Minister of State for Law, confirmed that the BJP was working on an anti-conversion bill because ‘poor and uneducated Hindus are becoming victims of the false propaganda against Hinduism’ (Ekadshi, 2009).

Following these statements, efforts were made to pass an anti-conversion law in the state during the second wave of anti-conversion laws, discussed earlier. One of the first items addressed by Karnataka’s Law Commission – established in 2008 by the BJP – was a petition to create an anti-conversion law for the state. This petition was filed by prominent Kannadiga scholar Prof. M. Chidanandamurthy, noted for propagating the view that ‘violence as part of protecting one’s religion is essential’ (Asianet News, 2018). In his appeal, he cited the Church Attacks, the Niyogi Commission report and the Orissa and Madhya Pradesh legislation to justify the need for legislation in the state. The Law Commission found that ‘the problem of forcible conversion is real, substantial and serious enough to call for a law’ (Government of Karnataka, Ministry of Law, 2013, p. 15). Simultaneously, draft legislation was also prepared by the BJP-led state legislature. The draft bill was almost identical to the Madhya Pradesh legislation and called for the ‘prohibition of conversion from one religion to another by the use of force or allurement or by fraudulent means and for matters incidental thereto’ (p. 15).

However, despite this draft, the bill was never brought to the floor of the state legislature because of the political crisis the BJP found itself in at the time. Facing arrests over allegations of corruption, the Chief Ministership changed hands thrice in two years. Simultaneously, Christians in the state had actively opposed these efforts following the release of the perceived-to-be-biased Somashekara Commission report (appointed by the Karnataka state government), which absolved the government and specific groups affiliated to the Sangh of any involvement in the ‘Church Attacks’. The BJP were ultimately voted out of power in 2013, and the Indian National Congress formed the government. However, even after leaving office, the BJP at the state level continued to press for the institution of such a law in Karnataka. For example, in December 2014, the state BJP president Prahalad Joshi, maintained that they were still willing to pass the law if they returned to power (Bhuvaneshwari, 2014).

In July 2019, the party returned to power in Karnataka following the fall of the Janata Dal Secular and Indian National Congress coalition. Since its return, without the shackles of coalition politics, it passed a bouquet of legislation addressing longstanding Hindutva concerns, such as the *Karnataka Prevention of Slaughter and Preservation of Cattle Bill* (2020). In addition to these bills which disproportionately discriminate against Muslims and Dalits who dominate these industries, the legislation also facilitated the involvement of vigilante enforcement by members of the Sangh Parivar. For example, in April 2021, 2 Muslim men were thrashed near Mangalore by 30 Hindutva activists on suspicion of transporting beef (Muslim Mirror, 2021).

In the months preceding the passing of the anti-conversion bill, the state apparatus was used to further lay the groundwork to justify the need for such a law to respond to the Christian ‘threat’. In July 2021, the Directorate of Minorities Welfare, Government of Karnataka, led a survey of churches in the state. In October 2021, Karnataka’s Intelligence Department had ordered senior police and intelligence officials to collect data on ‘authorised and unauthorised’ churches in Karnataka (TimesNowNews, 2021). Around the same time, a house committee of the Karnataka Legislative Assembly on

backward classes and minorities ordered a survey on Christian missionary work in the state to identify ‘unauthorised’ people involved in the work (The Indian Express, 2021). None of these surveys demonstrated any forced conversions in the state. Simultaneously, the People’s Union for Civil Liberties noted 39 instances of anti-Christian violence in 2021, claiming that members of the Sangh Parivar were responsible for them.

In 2022, the Karnataka State Legislature passed the *Karnataka Protection of Right to Freedom of Religion Act* despite protests by opposition parties and the state’s Christian community. Echoing longstanding Hindutva sentiments, the stated objective of this legislation was to tackle the ‘many instants of conversion by means of “allurement”, “coercion”, “force”, fraudulent means’ and also ‘mass conversion’ as they ‘cause disturbance to public order’. This legislation along with other anti-conversion laws should be seen as a form of structural violence as they represent the dominance of proponents of Hindutva ideology within India social-political-legal structure. Christians as underdogs, face avoidable and unnecessary hurdles and deterrents to the free practice of their religion as a result of these laws.

The justifications deployed following the passing of the law resonates with Hindutva tropes about Christianity, especially the anxieties around a ‘dying’ Hindu population. For example, in 2021, Tejasvi Surya, a BJP member of parliament from Karnataka, hailing the passing of the bill in the state, asserted that:

... the Hindu has been taken from his mother religion. There is only one possible solution to address this. Those who have left for various socio, political and economic reasons through the course of India’s history must be brought back to the Hindu faith...A large number of Hindus has already converted and the count is increasing. It is numerical strength that decides political power in a democracy. (NDTV, 2021)

Instances of physical attacks against Christians also increased after the passing of the bill and appeared to especially target Dalits and Adivasi Christians. For example, on 29 December 2021, a few days after the bill passed the lower house, seven members of a right-wing (suggested to be Hindutva leaning) group disrupted the annual prayers of a Dalit Pastor in North Karnataka on accusations of ‘converting’ neighbours and villagers to Christianity through allurement, force and fraud. They attacked the worshippers and hailed casteist slurs at them, accusing the women of being ‘professional sex workers’ and the men of being ‘sons of professional sex workers’. One of the victims of the violence said, ‘They abused our caste as a group of toilet cleaners and chappal [slippers] makers, and that we were betraying the Hindu faith that were born into’ (The Wire, 2022). What makes incidents like these more potent is the pattern by which they are executed. A PUCL-K report suggested that first, Hindutva leaders would organise a mob and provide details of where Sunday prayers will be held. Next, they will notify the local police of these details, suggesting that ‘conversions’ will soon occur. The attack would then be executed, with the police arriving minutes later. On several occasions, instead of helping victims of assault, the police took pastors and worshippers to police stations and booked cases against them. The whole incident would be recorded and distributed on social media to reassert these groups as the ‘protectors’ of Hindus against the

Christian ‘threat’. Notably, the local media supported this work with a ‘mix of specious arguments, misleading statements, outright falsehoods, one-sided reporting’. The coverage of anti-Christian violence was ‘sensationalist in nature, often deploying the device of ‘sting operations’ as if someone had been caught doing something illegal’ (People’s Union for Civil Liberties, 2021).

In June 2023, the newly elected Indian National Congress government revoked Karnataka’s anti-conversion law (The Economic Times, 2023). However, despite the law’s revocation, the system of violence still persists. For example, the PUCL notes that there were 84 instances of allegations of forced conversions, cow vigilantism, and hate speech, amongst others, in 2023 in Karnataka’s Dakshin Kannada district (Ajay, 2024), which saw the 2008 Church Attacks, bringing this story full circle.

## Conclusion

As this article showed, anti-conversion laws in India have embedded Hindutva’s demographic and political anxieties about the ‘Christian Threat’ into India’s law. The laws passed in the third wave can serve as comprehensive legal efforts to limit conversion to Christianity and maintain the ‘Hindu’ majority in the country. Adopting Galtung’s framework, the article further highlighted the violent systems impacting India’s Christians in states where these laws are present using the illustrative case of Karnataka. When viewing the violent system which these laws operate in, we see the interconnectedness of direct, structural and cultural forms of violence which reinforce each other. This therefore allows us a more comprehensive and nuanced understanding of anti-Christian violence plaguing India today.


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