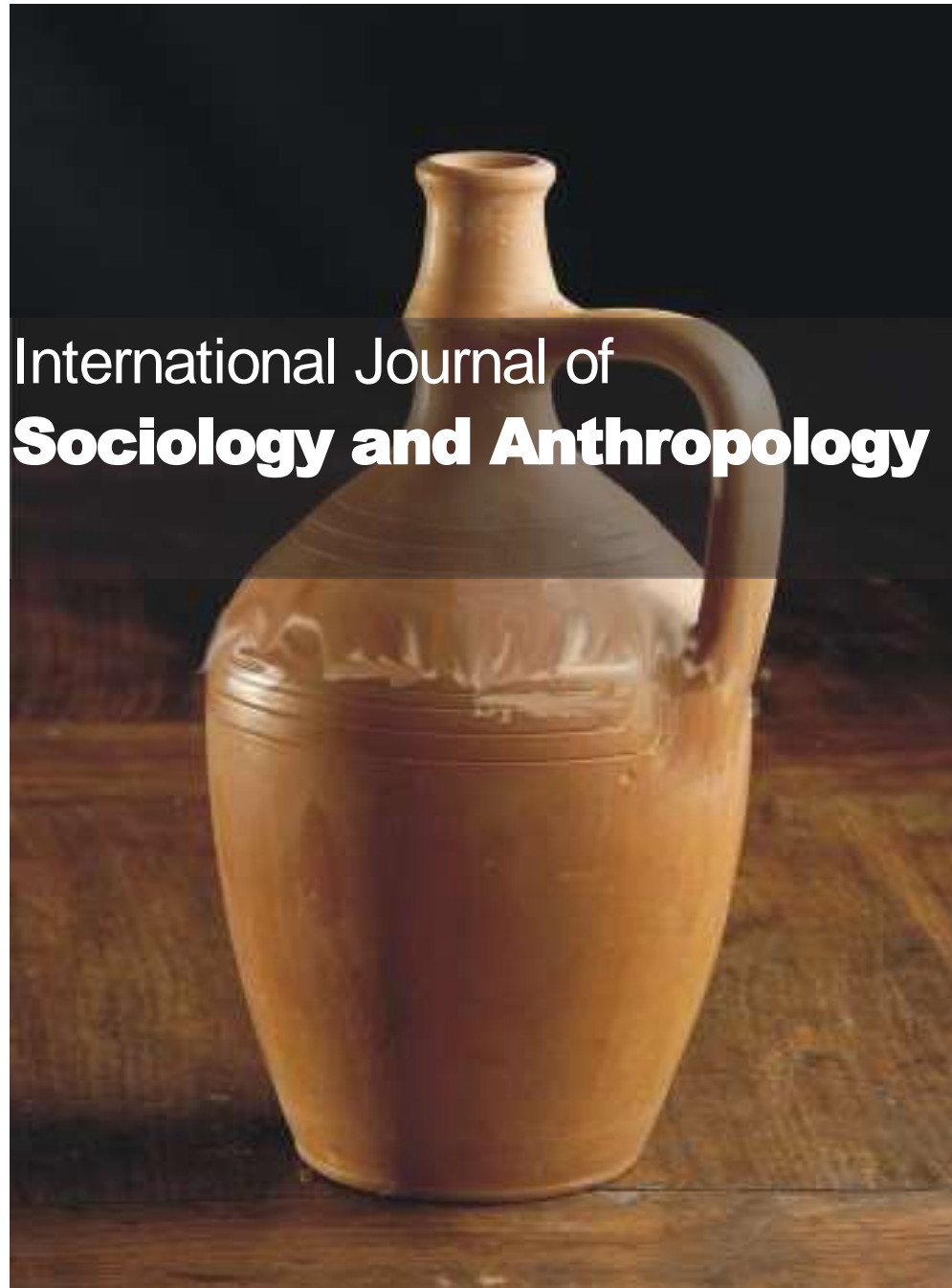


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Selvin Raj Gnana

Review

Caste system, Dalitization and its implications in contemporary India

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This paper deals with caste system and its implication in contemporary India. It begins with the origin of caste, religious sanction and justification made by ancient Hindu scriptures. How the role of caste which was originally followed on the basis of function among people turned out to be a discriminating element of 'Untouchability'. It highlights various factors influencing the stabilization and destabilization of caste in the lives of people. Finally, it takes us to understand the process of Dalitization in India which gives future orientation to Dalit struggles. Certainly, their victory is found on the battle ground than visualizing it in the future. In this process at this juncture the political democracy of India is really at stake.

Key words: Dalit, untouchability, identity assertion, discrimination, Dalitization, dignity of labour, transformation.

INTRODUCTION

At the time of Aryan migrations (1500 BCE) to India, the aborigines were assimilated into the social order. By the time the Laws of Manu were codified, we have reference to a class called *the Chandala*, who were of mixed origin and were regarded as holding a definite place in the society below that of the *Sudras*. In Purusha Sukta or Purusha Suktam (The Purusha Sukta of the Rig Veda, Hymn 10.90), the different parts of the Cosmic-being or Creator (Purusha) is mentioned. The Brahmana was made his mouth; the Rajanya (Kshatriya) was made his arms; the Vaishya was his thighs; and the Sudra was made his feet.

The present out-caste communities include those despised people who occupy a position parallel to that assigned by Manu to the *Chandalas*, including the leather-workers of North and South India and also those who have been expelled from the caste communities for

breaches of Hindu social law, for example, intermarriage with and acceptance of food from one of the out-castes. These peoples are sometimes referred to as *out castes* or *Avarnas* or *Panchamas*, or *harijans*, or *schedule caste* or *milechas* or simply *fifth class*. They are considered least privileged, impure, dirty and the most despised among all. Their touch or even their shadow falling upon a man of dominant caste is being considered a source of pollution.

CASTE AS A FUNCTION AND RELIGIOUS SANCTION

The term 'caste' is inclined to be misleading, because it is not an Indian word. It originated from the Portuguese word *casta* (Minsheu et al., 1599) meaning race, lineage, breed or class, and began to be used by Portuguese

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sailors in the 16th century to describe the class divisions they found among Indians which seemed so curious to them. Even today Hindus use such other terms as *varna* (means color), *jati* (means birth or descent), *kula* (means family), and *gotra* (means race). Evidently, the class divisions were purely functional. The *Brahman* fulfils the priestly and clerical offices. The *Kshatriya* was the prince and ruler. The *Vaisya* was the trader. The *Sudra* was the laborer. And the various sub-castes among the *Sudra* were marked by specific occupations. The system had persisted throughout the centuries supporting the functional stability in a society.

In this well knit Hindu society, professions and trades have been assured by birth or descent. Birth in a particular caste group predetermined the individual's occupation as well as his status. At the same time the Hindu religion gave sanction to the system which enabled the dominant castes to enjoy its advantages and to perpetuate the discrimination among the oppressed castes. Hinduism born out of *Brahminic philosophy* made us believe that God created human beings un-equals. The primary concern of the Hindu society is the preservation of the established Hindu social order rather than any effort at the improvement of human welfare and well being. The only possibility of progress is within the caste. It is taken for granted that the accident of birth is the sole determinant of occupation and of status. The "Karma theory" of Hindu philosophy highly backs up this view. Personality is subordinated to system. Value is judged in terms of origin within rather than service to the community. Certainly it deprives men and women of the potent motive, the desire to rise in the social ladder and to place one's children at a more advantageous starting point in life. Thus, a person born in an oppressed caste cannot dream of achieving higher status in the society.

Led to discrimination and untouchability

The untouchables had the lowest economic position and were traditionally subjected to onerous social and civil disabilities. It is believed that the practice of untouchability began during the Pushymitra Sunga's rule (Purana, 2002) established in 185 BCE, about 50 years after Mauryan Emperor Ashoka's death. Pushyamitra Sunga was a Brahmin but the commander-in-chief of the last Mauryan King was Bruhadatra a *Shudra* by caste. Pushyamitra killed Bruhadatra and established Brahmin rule, which continued till 800 AD. He feared that the untouchables would attack him. So he asked Manu, a Brahmin pandit to suppress the revolution. Manu codified all inhuman and unethical laws against the *Shudras* in the name of religion. His work was later known as *Manusmriti*. Thus, the Brahmins, this time acquired the highest status in the society. It was the kings who enforced the caste divisions. Their rule was to protect *Dharma*. *Varnashrama Dharma* was often supported, propagated and reinterpreted through the Upanishads,

the Sutras, the Smritis and the Puranas. It was to keep the interest of the dominant caste intact. The ancient *Dharmasastra* of the Hindus imposed a series of social, political, economic and religious sanctions and restrictions on the suppressed castes. The untouchables had no access to education or to learn Sanskrit language (Rajkumar, 2011).

Derivation of the term 'Dalit' in today's context

Thus, Dalits are most oppressed in India. They are typically associated with occupations regarded as ritually impure, such as those works dealing with cleaning, toilets, drainage, waste and carcasses. They are a people traditionally looked down upon as "untouchable."

Systematic oppression of Dalits and continual denial of opportunities down the centuries has made Dalits to internalize all their bitter experiences. They are made to think of themselves lower than others. They are made to look at themselves ugly, lazy, disorganized, having low morale, less competent and intellectually incapable. Such understanding of internalization about themselves is deep in their psyche. They need to be conscientized and liberated from their own low self image.

The word "Dalit" in Marathi derived from Sanskrit root *dal*, means "ground," or "suppressed" or "crushed." The Marathi word 'Dalit' was widely used by Mahatma Jotiba Phule and later by Dr. B. R. Ambedkar for the Outcastes and Untouchables who were oppressed, suppressed, broken and crushed by Hindu society. It meant not just economical and political backwardness but socio-cultural and religious backwardness faced through their being born into a particular caste in the Hindu society. The inhuman life situation was not their own choice but they are pushed into. So the term 'Dalit' gives them a new identity of liberation and assertion.

According to Firstpost Sep 14, 2018, The Ministry of Information and Broadcasting has issued an advisory to all private satellite TV channels, urging them to refrain from using the nomenclature 'Dalit' for people belonging to Scheduled Castes in compliance with a Bombay High Court directive. The letter, addressed to all private TV channels on 7 August 2018, referred to a June directive by the Bombay High Court asking the ministry to consider issuing a direction to the media to stop using the word 'Dalit'. This is purely a political strategy of the ruling government to nullify the assertive dimension of the word "Dalit". The word "Dalit" denotes affirmative sense that they are oppressed and it identifies the enemy very clearly. Since it pricks the conscience of the dominant caste especially the Brahminic hegemony with Hindhutva ideology, an attempt is being made purposefully to remove the word completely from usage.

"Dalits" as self-assertion

Dalits have chosen the "Dalit" label for themselves for at

least three important reasons. First, the label indicates that the condition of the Dalits has not been of their own making or choosing; it is something which has been inflicted upon them by others. Secondly, there is an element of militancy built into the label; Dalits seek to overcome the injustices and indignities forced upon them so as to gain the equality and respect hitherto denied them. Thirdly, "Dalit" also indicates that all these sub-castes called in different names in different states of India (Pallas, Pariahs, Chkkalias, Pulayas Malas, Madigas, Mushars, Chamars, Mahars, Bhankis, etc.) share a common living condition and should therefore unite in a common struggle for human dignity, equality, justice and respect under a common name.

The Dalits assert, saying that the Hindu *Manu Dharmasastra* successfully created a division among human beings. Manu says that Brahmins are superior and then Kshatriya, Vaishya, Sudras and the untouchables are nowhere. Thus, the whole country is made to believe that some are always superior to others by birth. Even Dalits believed that! But the Indian constitution says very clearly that everyone is equal.

Factors that perpetuate Caste

However, we are educated and modernized still there are many factors subtly play their role in perpetuating caste discrimination. Caste is a reality of human condition which influences our worldview, perception and outlook on others. It is the mind-set of everyone who practices caste. The system is maintained through the rigid enforcement of social ostracism (a system of social and economic penalties) in case of any deviations. Inequality is at the core of the caste system. Those who fall outside the caste system are considered "*lesser human beings*", "*impure*" and thus "*polluting*" to other caste groups. The work they do adds to the stigmatization they face from the surrounding society. The exclusion of Dalit communities by other groups in society and the inherent structural inequality in these social relationships lead to high levels of poverty among the marginalized Dalits and other oppressed people.

Purity-Pollution

Caste discrimination is so strong due to purity-pollution concept in the mind of people which was found in Hindu religion promoted by the Brahmins. Dalits are associated with death. The news about the death of a person in the village is communicated to the neighbouring villages by the Dalits. A Dalit has to dig the graveyard in the case of burial and burn the dead body in the case of cremation. They are destined to eat the dead animals. Disposal of dead animals from the village is only done by the Dalits. They are also involved in leather works. So, automatically

they are treated impure by the non Dalits. It creates a make-believe situation that a pure Hindu will keep himself away from eating meat and practice vegetarianism in order to avoid pollution and defilement. Orthodox Hindus attribute holiness to cows and cows are worshiped. They believe that killing a cow and consuming beef (cow meat) is sacrilegious. Some recent alarming violent events in different parts of the country reveal that some Hindu fanatics even mercilessly tortured and killed people who had eaten beef.

Matrimonial alliances

By and large Hindu society is endogamous due to caste differences among them. The majority of persons marry only within their own caste. Brahmin, Kshatriya, Vaishya and Sudra all marry within their respective castes; Hindu community does not approve inter-caste marriage even now. Even among the Dalit sub-castes endogamy is much preferred. A person born in a particular caste marrying a person in the same caste keeps the caste hierarchy intact. In case of inter-caste marriage, the couple's identity is determined by the caste of the bridegroom. A Dalit man who marries a dominant caste woman can never climb in the social ladder.

Colour consciousness leading to inferiority complex

To some extent, majority of the Dalit population are dark in their complexion. Their colour of the skin is dark because, they are exposed to hard labor under hot sun. Since they are involved in doing very menial jobs other non Dalits do not respect them in the society. The dominant caste people look down upon them and expect them to be subservient. This colour consciousness also very much internalized by the Dalits themselves and they feel very much inferior to the fair skinned people in the society. Somehow they think that being born dark is ugly and dark is an unwanted colour. Thus they develop inferiority complex which keeps them aloof from the rest of the society.

Works and trades are caste based

The intensity of caste is very much felt in rural India because caste and caste based works are interconnected. A cobbler's son continues to be a cobbler only. A scavenger's son automatically takes up the work of scavenging after his father. Due to poverty and lack of opportunity for education and other skills most of the children in Dalit villages end up doing the same works and family trades of their parents. Most of the Dalit children are not to be understood as 'drop outs' but they are 'pushed outs' from school education. Since all the

members of the family involve in one particular work and they are identified with a particular caste, they are unable to take up any other works. This situation continues in many parts of rural India.

Food habits determine one's caste affiliation

In India, caste system ensures what you are from what you eat. What you eat dictates who you marry, where you live, your job, your social status, whether you are "pure" or "impure", whether you are entitled or deprived, and whether you can hold your head high or let it hang in shame, because the food you eat is a function of your caste. A dominant-caste person can only accept food or a drink from someone of a similar or above their rank. If the food has been touched or cooked by someone of a oppressed caste, it must be rejected. When a dominant-caste person gives food to someone of a suppressed caste, it is always dropped, rather than placed, in their hands or vessels, to avoid any pollution. Even today, food habits are used as a tool of social exclusion and oppression. Rich, dominant-caste Hindu landlords in many parts of our country use vegetarianism to keep out oppressed -caste tenants (and Muslims, too, of course) by specifying that flats can be rented out to only vegetarians. Dominant-caste Hindus can refrain from eating meat because they could afford a range of vegetables and dairy products. These were the items Dalits could not afford, so they took their protein where they could find it, from pigs, buffalos and from cows, because beef was comparatively cheaper than mutton or chicken.

Factors that destabilize caste

Though caste is an integral part of everyone's life in India, there are many factors that affect its stability. Unlike rural villages, in urban cities we find people though migrated from different parts of the country well settled there and live together without much difference among them. Caste is not an issue to be considered the other lower than oneself. People's outlook on caste is changing over the years due to social awareness and education. We shall examine the destabilization process of caste on account of various factors.

Education

Primarily education and social awareness undermine caste hierarchy not merely in the case of the educated, but also in the matter of treatment accorded to the less fortunately born. Education enlightens people's minds and makes them understand their inner potential. The progress of education has involved the training of a growing number of men and women from the suppressed castes who are able to take their places abreast of the

dominant caste people, and who resent the operation of any system which would rob them of the privileges they have earned. Education coupled with language proficiency brings change in every one's life style, attitude and mannerism. They shake off their low self image and try to be in par with other non Dalits in every aspect of life. However, achieving equality among all is a tedious process.

Trade and industrial revolution

A second influence that is working toward the corrosion of caste is the economic development. India under the British Raj has become vitally a part of a larger world. The East India Company which promoted trade in India with British and other oversea countries enabled people to move beyond their caste based labor. Industrial revolution in Europe also influenced the working class in India. The British owned cotton mills in India absorbed number of people into it irrespective of their traditional works in villages. Trade with Europe, America, and Japan has meant the introduction of commodities from these lands, enlarging the possibilities of the Indian market, and forcing competition upon some of the Indian industries. This has resulted in, on one hand a demand for broader economic opportunities than caste permits, and on the other hand a necessity to choose other than caste-determined occupations through industrial rivalry.

New economic policy of India

The New Economic Policy since 1991 has also played a major role in escalating this process of caste corrosion. Liberalization, Privatization and Globalization (LPG) policy of our country opened the gates of trade and commerce in India. Restrictions imposed on foreign trade were relaxed and structural adjustment policies (SAP) were implemented to suit their need. Thus many Multi National companies (MNC) and Trans National companies (TNC) had easy access to Indian markets through their Foreign Direct Investment (FDI). Basic Information Technology (IT) coupled with job opportunities in those MNCs and TNCs absorbed many middle and lower middle class people into them. This not only brought a quick change in the life style of the Dalits but also made them in par with the other non Dalits working in the same environment. But, at the same time the poor and the lower middle class Dalits who do not have access to such education were pushed to the periphery since the small scale industries were forced to close down.

Modern communication and transport systems

The vast expansion of transportation facilities in the resent past has also stimulated the tendency toward

caste disintegration. The train service on one hand refused to take cognizance of caste, and the oppressed caste person who pays for his/her train ticket has the same right to take a seat in any compartment along with a dominant caste person where there is room. It is absurd for any transport authority to reserve berths for Brahmins to the exclusion of the Dalits. During travel, one can eat whatever he/she wants without questioning the likes and dislikes of the others whether the person is a Brahmin or a Dalit. It is same for everyone who affords to travel by bus, tram, train, shared-auto, air and ship without any discrimination what so ever! Physical proximity to one another in every mode of transport automatically cracks the solid rock of untouchability.

Progressive understanding of religion

Another influence tending to undermine caste is the progressive and liberative understanding of religion which gives importance to human dignity and self respect. The presence of Christianity has been more potent to that end. Christianity has at once spread the light of science and the doctrines of equality and fraternity. Since Christianity assures a casteless human society many oppressed caste people in Hinduism are drawn towards Christianity as it happened towards Buddhism in 6th C. BC. Unfortunately the people who are converted to Christianity also brought caste prejudices and practices into it. So, in reality we do find the prevalence of caste discrimination in Christianity, Islam, Buddhism and Sikhism.

The new legal system and constitution of India

The new legal system, introduced by the British Government, has given a severe blow to the caste system in India. Equality before law irrespective of caste has been firmly instituted. Consequently, the age old discrimination against the oppressed castes has been removed. Further, with the establishment of law courts, the traditional *caste Panchayats* in villages lost their power and sanction to punish the deviants. A number of Acts like the Untouchability Offences Act of 1955 and the Hindu Marriage Act of 1955 have abnegated the evil effects of the caste system. Indian Constitution bestows some fundamental rights on the citizens irrespective of caste, creed, colour or gender. It offers equal opportunities to all. Para 15(2) of the Constitution, which declares all citizens as equal, directly attacks the Hindu social order based on inherited inequality prompted by Hindu sacred scripture.

Beef eating practice among Brahmins

In general, Dalits are economically poor. This community depends on rearing domestic animals and cultivating

small portion of land available to them. Meat is a common food for them. Though, cow is being considered a sacred animal in orthodox Hindu religion, nowhere in Hindu scriptures we find eating beef is forbidden. Rather we find references where even the Hindu gods delighted in eating beef and how important for a Brahmin to eat beef from his religious view point.

The following references in Hindu scriptures will elucidate how the Brahmins used to eat beef in earlier days. Hinduism's greatest propagator Swami Vivekananda said that one will be surprised to know that according to ancient Hindu rites and rituals, a man cannot be a good Hindu who does not eat beef. We find in Manusmriti that it is not sinful to eat meat of eatable animals, for Brahma has created both the eaters and the eatables. Maharishi Yagyavalkya said that he ate beef because it was very soft and delicious.

"On the occasion of a girl's marriage, oxen and cows are slaughtered". – Rig Veda (10/85/13)

"Indra used to eat the meat of cow, calf, horse and buffalo". – Rig Veda (6/17/1)

"The cow should be slaughtered on the arrival of a guest, on the occasion of 'Shraddha' of ancestors and on the occasion of marriage." – Apastamb Grihsutram (1/3/10)

"If a Brahmin refuses to eat the meat offered to him on the occasion of 'Shraddha' or worship, he goes to hell." – Vashistha Dharmasutra (11/34)

In ancient India, cow slaughter was considered auspicious on the occasion of some ceremonies. Bride and bridegroom used to sit on the hide of a red ox in front of the 'Vedi - altar' (Amritlal BS: 1967). A renowned historian R.C. Majumdar says, "this is said in Mahabharath that King Rantidev used to kill two thousand other animals in addition to two thousand cows daily in order to give their meat in Charity." Actually speaking, prohibition of eating beef is a weapon in the hands of the Brahmin to uphold their supremacy in Indian caste hierarchical society.

DALITIZATION PROCESS

Caste politics are taking different turn across the country. The term dalitization does not mean Sanskritization or Hinduization. Now the term has got a new realm of meaning that it is the process of getting the provisions vested for Dalit bahujans. Demanding for reservation is one such provision every community is running after. Dalits struggle to regain their human dignity and respect. From identity assertion, the Dalits are moving towards the transformation of the society. This dalitization process leads people to various realms.

Leading to affirming dignity of labour

Protests have sparked in various regions over gaining the

'Backward Caste' tag: Jats from Harayana, Kapus from Andhra Pradesh, Gujjars from Rajasthan, Patels from Gujarat, and Marathas from Maharashtra are demanding reservation for their own community. They all want to be included in the OBC list. This renewed interest in claiming for backward caste tag, according to Prof. Kancha Ilaiah is called "Dalitization" (Kaminsky et al., 2011).

According to him a time would emerge when people would look for spiritual equality, 'Dalitised mode of thinking, God has made all humans equal.' Today, the castes which did not want reservations (Jat, Gujjars, Patels and Kapus) are demanding for reservations, and the solution he says is to give them their position in the community. Then, "What is an open quota? In essence it is a Brahmin quota," he slickly pronounces. When the Dalitization process happens more and more, the human labor will be respected.

Leading from Dalit identity assertion to transformation

Soon after the incident of the Dalit, PhD scholar Mr. Rohith Vemula's suicide at Central University of Hyderabad, Prof. Kancha Ilaia wrote that Dalit students like Vemula were creating a 'new cultural idiom'(Indian Express 19th Jan 2016). It is a quest for transformation. "The struggles at JNU, University of Hyderabad, Jadavpur University, IIT-Madras's issue with Ambedkar Periyar Circle, beef eating festivals in Osmania or EFLU are 'not a struggle for identity' but these are about transformative, political, ideological issues" says Prof. Kancha Ilaiah.

He asserts saying, the eating of beef, exercising the right to freedom of speech and being a human without the politics of caste, are all about transformation of society where equality is the goal. These are not identity issues, but equality issues; these are issues of Indian democracy becoming mature. Identity is just a low grade of that, transformation is the next level.

Leading towards self-respect and freedom

Valerian Rodrigues writes in Hindu editorial page (Anil, 2016), "It is increasingly human dignity and worth and the capacity to be what one can be, that occupy the high ground. The reduction of freedom to one's birthmarks, and the social structures, institutions, prejudices and interactions that sustain such a state of affairs are seen as new forms of enslavement. A patch of land of one's own, a home where one can live on one's own terms, not to be condemned to certain occupations, or be treated as low and defiled stir Dalit imagination today as never before".

Valerian further writes, "The slogans that resound in the Dalit movement today indicate their choice of food, right

to land, *Swabhiman* and *Atmabhiman* (Self-respect), *Azadi* (Freedom) and dignity. They pronounce death knell to historic oppression, and freedom to define their own self-hood. Dalits also proudly announce the equality of women and their right to choose the kind of life they wish to live and denounce the surveillance of Hindutva brigades on them. The dragging out of Mohammad Akhlaq from his house and his killing by a local Hindu mob on the charge of storing beef at his house in Dadri, Uttar Pradesh, has become an important issue in Dalit struggles, woven around the right to food. As a result, we find the bonding together of large number of associations of these groups and communities". The Dalits question, how can others (the non Dalits) decide for them what to eat and what not.

Leading to right to dissent

Another event published in all social media on October 2, 2016, a Ph.D scholar Velupula Sunkanna from Hyderabad Central University refused to accept his Ph.D Degree from the hand of the then Vice Chancellor Mr. Appa Rao. Since, Mr. Appa Rao was named as one of the culprits who was accused and considered to be a cause for Rohit Vemula's suicide. It is nothing but asserting one's democratic right to dissent. All that Mr. Sunkanna wanted is transformation in the mind set of every dominant caste man and woman.

Leading to counter cow vigilantism

As many as 200 cow vigilante groups have sprung up in Gujarat. They have become a law and order problem in Gujarat because of their aggression and the way they take law into their hands. These vigilantes are self-proclaimed *gau rakshaks* (Cow vigilantes) but in actual fact they were rowdies and hooligans. They create a make-believe situation where their sole aim is to protect cows which are considered as sacred animals (*Gau matha*) by orthodox Hindus. Armed members of such *Gau rakshaks* often intercept vehicles transporting animals or raid slaughter houses where they suspect cows are being slaughtered. It is reported on 11th July 2016 four Dalit youth were flogged mercilessly by some cow vigilant group members in Una, Ahmadabad district, Gujarat (Indian Express 21st July 2016). As a consequence of this event, the Dalits had taken a stand in Una not to get involve in disposing any dead animals in that area. They started saying, "*This is your cow, if it is your mata (mother), then please clean yourself and you don't throw it on us*". It is neither reactionary nor revolutionary; it is just a question of common justice. It is amazing that Dalits cannot touch their [upper castes'] cow, but they have to carry the dead cow and bury them. Saying "no" to do their traditional work of disposing

dead animals is a pro-action move towards transformation.

CONCLUSION

Dalit identity assertion and their struggle for equality in political, economic, social, religious, health and education leading towards societal transformation are inevitable. Certainly it is going to create a revolution among people in the near future and it will be witnessed in Indian history. Democracy in India is undergoing a thorough change and transformation with regard to caste and its influence on the Dalits and other oppressed communities.

“The oppressor is solidary with the oppressed only when he stops regarding the oppressed as an abstract category and sees them as persons who have been unjustly dealt with, deprived of their voice, cheated in the sale of their labor when he stops making pious, sentimental, and individualistic gestures and risks an act of love. True solidarity is found only in the plenitude of this act of love, in its existentiality, in its praxis. To affirm that men and women are persons and as persons should be free, and yet to do nothing tangible to make this affirmation a reality, is a farce” (Amritlal, 1967). Paulo (2007), *Pedagogy of the Oppressed*.

Caste feeling is deep in the psyche of every Indian. Even the educated is not liberated from his/her caste affiliation in the place where he/she lives. Unless the mindset of people undergoes a drastic change, the tentacles of caste will continue to influence all our lives. Yet the victory of Dalit struggle is on the battle ground rather than visualizing it in future.

The architect of Indian Constitution Dr. B.R. Ambedkar said, “In politics we will have equality and in social and economic life we will have inequality. In politics we will be recognizing the principle of one man one vote and one vote one value. In our social and economic life, we shall, by reason of our social and economic structure, continue to deny the principle of one man one value. How long shall we continue to live this life of contradictions? How long shall we continue to deny equality in our social and economic life? If we continue to deny it for long, we will do so only by putting our political democracy in peril. We must remove this contradiction at the earliest possible moment or else those who suffer from inequality will blow up the structure of political democracy which this Assembly has so laboriously built up.”

CONFLICT OF INTERESTS

The author has not declared any conflict of interests.

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