

Citation: Dr. Amit Kumar, "Conversion, Caste, and Constitutional Identity: A Critical Study of Scheduled Caste and Scheduled Tribe Status in India" St. Soldier Journal of Law and Social Science, Vol. 2:2, July 2026 pp. 107-124

Conversion, Caste, and Constitutional Identity: A Critical Study of Scheduled Caste and Scheduled Tribe Status in India

Dr. Amit Kumar

Assistant Professor, Army Institute of Law, Mohali.

I. Introduction

The caste system has historically been one of the most distinctive and complex features of Indian society. Over centuries, Indian society gradually evolved into a rigid hierarchical structure divided into numerous castes and sub-castes. Although the system may initially have possessed a certain degree of flexibility, with the passage of time it became hereditary and deeply entrenched in social life. This rigid social order created severe inequalities and resulted in the oppression, exclusion, and exploitation of weaker sections of society by socially dominant groups.¹ The hierarchical nature of the caste system not only produced social discrimination but also deprived marginalized communities of equal access to education, economic opportunities, political participation, and human dignity. Certain communities suffered centuries of social and economic backwardness due to systemic exclusion and untouchability. Recognizing these historical injustices, the framers of the Constitution of India adopted various protective

¹ Indira Gandhi National Open University, "Unit 5", available at: <https://egyankosh.ac.in/bitstream/123456789/66052/1/Unit5.pdf>

and affirmative measures to uplift disadvantaged groups and ensure substantive equality.²

Accordingly, the Constitution empowered the President under Articles 341³ and 342⁴ to identify Scheduled Castes and Scheduled Tribes for the purpose of granting constitutional safeguards, reservation benefits, and other protective measures. While Scheduled Castes were primarily identified on the basis of caste-based social disabilities arising from the traditional Hindu social structure, Scheduled Tribes were recognized on the basis of their distinctive tribal identity, geographical isolation, cultural uniqueness, and socio-economic backwardness.

In contemporary India, the issue of religious conversion and its effect on Scheduled Tribe status has emerged as a significant constitutional and socio-legal question. Unlike Scheduled Castes, whose status under the Constitution (Scheduled Castes) Order, 1950⁵ is subject to religious restrictions, no explicit constitutional provision bars a Scheduled Tribe person from retaining tribal status after conversion to another religion. This has generated intense debate regarding the relationship between religion, tribal identity, constitutional equality, and reservation policy.⁶ The controversy raises important constitutional questions concerning the scope of religious freedom under Article 25⁷. It also highlights broader concerns relating to tribal identity, cultural continuity, affirmative action, and the protection of marginalized communities in a secular democratic framework.

² G. M. Arumugam v. S. Rajgopal & Ors., AIR 1976 SC 939.

³ INDIA CONST. art. 341.

⁴ INDIA CONST. art. 342.

⁵ The Constitution (Scheduled Castes) Order, 1950.

⁶ G. M. Arumugam v. S. Rajgopal & Ors., AIR 1976 SC 939.

⁷ INDIA CONST. art. 25.

The present research paper seeks to critically examine the constitutional validity of retaining Scheduled Caste and Tribe status after religious conversion, analyse important judicial pronouncements on the subject, and explore the contemporary legal challenges associated with the issue. The study also attempts to evaluate whether tribal identity is fundamentally religious in nature or whether it continues to survive as a socio-cultural and ethnic identity despite conversion to another faith.

II. Meaning of Caste and Tribes

The word “caste” is derived from the Spanish and Portuguese word *casta*, meaning lineage, breed, or race, and *casto*, meaning pure and unmixed.⁸ The term “caste” was first used in the Indian context by Portuguese sailors and traders during the fifteenth century when they came to India for trade and commerce.⁹ Caste in the Indian context does not merely refer to the four traditional varnas, but rather to the numerous castes and sub-castes that exist within Indian society. In *Cooppoosami Chetty v. Duraisami Chetty*,¹⁰ the Madras High Court described caste as a voluntary association of individuals formed for specific social purposes. A caste is generally a distinct, though evolving, social group regulated by its own customs and internal rules. Sir Herbert Risley, in his work *The People of India*, observed that castes may emerge not only from common religious identity but also from shared

⁸Vina M. Goghari & Mavis Kusi, An Introduction to the Basic Elements of the Caste System of India, 14 *Frontiers in Psychology* 1210577 (2023), available at :

<https://www.frontiersin.org/journals/psychology/articles/10.3389/fpsyg.2023.1210577/full>

⁹ S. Sahoo, “Caste,” in *The Wiley-Blackwell Encyclopedia of Social Theory* 1–7 (Bryan S. Turner ed., Wiley Blackwell, 2017).

¹⁰ *Cooppoosami Chetty v. Duraisami Chetty*, I.L.R. 33 Mad. 67 (Mad.).

occupations and social functions.¹¹ Similarly, in *Muthusami v. Masilamani*,¹² Sankaran Nair, J. noted that changes in occupation, migration to different places, or the coming together of people engaged in a common profession can lead to the formation of new castes. Thus, caste is better understood as a social and occupational grouping rather than purely a religious classification.

There is often confusion between the concepts of caste, varna, sub-caste, and tribe, as these terms are frequently used interchangeably in sociological discussions. This overlap has created difficulties in properly analysing the caste system. Sociologist S. C. Dube observed that the lack of clear distinctions between terms such as varna, caste, and sub-caste has weakened meaningful sociological comparison and understanding of Hindu social structure. According to him, the absence of commonly accepted definitions and analytical standards has made it difficult to study caste accurately as a central feature of Indian society.¹³

Several scholars, including G. S. Ghurye, M. N. Srinivas, Dube, Bailey, and Mayer, highlighted the need to distinguish these concepts clearly, though none could provide completely precise boundaries between them. Broadly, caste may be understood as an evolved form of the earlier varna system. Initially functioning as a class-based division in ancient India, it gradually acquired religious legitimacy and

¹¹ Herbert Risley, *The People of India* (Thacker, Spink & Co., Calcutta & Simla, 1915), available at : <https://archive.org/details/cu31924024114773/page/30/mode/2up> (last visited May 20, 2026)

¹² *Muthusami v. Masilamani*, I.L.R. 33 Mad. 342 (Mad.).

¹³ S. C. Dube, *India's Changing Villages: Human Factors in Community Development* (Allied Publishers, 1958), available at : <https://ia801407.us.archive.org/2/items/in.ernet.dli.2015.224443/2015.224443.Indias-Changing.pdf> (last visited May 20, 2026).

rigid social rules. What makes the caste system distinct from other forms of social stratification found in countries such as the United States is the strong religious sanction attached to caste distinctions, along with features such as hereditary status, endogamy, and social hierarchy.¹⁴

III. Meaning of Tribes

The expression “backward tribe” was first introduced in the Government of India Act, 1935. Later, the Constitution of India continued using this concept but replaced the word “backward” with the term “Scheduled,” leading to the expression “Scheduled Tribes.” Although the Constitution recognises Scheduled Tribes as a special category requiring protection and welfare measures, it does not provide a clear or exact definition of the term.¹⁵ A tribe has been defined as a social group of a simple kind, the members of which speak a common dialect, have a single government and act together for such common purposes as warfare. Other typical characteristics include a common name, a contiguous territory, a relatively uniform culture or way of life and a tradition of common descent. Tribes are usually composed of a number of local communities e.g. bands, villages or neighbourhoods and are often aggregated in clusters of a higher order called nations. The term is seldom applied to societies that have achieved a strictly territorial organisation in large states but is usually confined to groups whose unity is based primarily upon a sense of extended kinship ties; it is no longer used for Kin groups in the strict sense, such as clans. Tribal communities are regarded

¹⁴ *Social Structure and Social Change* (Lovely Professional University, Distance Education), available at :

https://ebooks.lpude.in/arts/ba/year_2/DSOC201_SOCIAL_STRUCTURE_AND_SOCIAL_CHANGE_ENGLISH.pdf (last visited May 20, 2026).

¹⁵ Suman Negi, Educational Disparities and Opportunities: A Study of Scheduled Tribes of Northwest India, XXII (1) *National Journal of Education* 18 (2024).

as the original inhabitants or indigenous people of India, possessing their own distinct social, cultural, religious, and economic traditions. They generally reside in forests, hilly areas, and geographically isolated regions, and are often identified by names that signify people of the hills, forests, or original settlers. In India, tribal communities are commonly referred to as “Adivasis” or “Anusuchit Janjati.”¹⁶ The term “Scheduled Tribe”¹⁷ is the constitutional expression used to officially identify and recognise these tribal groups.

IV. Constitutional Status of Caste and Tribe

A plain reading of clauses (1) of Articles 341 and 342 of the Constitution makes it clear that the President has the authority only to specify which castes or tribes shall be regarded as Scheduled Castes or Scheduled Tribes for the purposes of the Constitution in relation to a particular State or Union Territory. Once such a notification is issued under these Articles, only Parliament has the power to include or exclude any caste or tribe from the notified list through legislation. Except for this limited power of Parliament, the Presidential notification cannot be altered by any subsequent notification.

The Constitution also makes it evident that Scheduled Castes and Scheduled Tribes are identified specifically in relation to a particular State or Union Territory. This means that a caste or tribe recognised as an Scheduled Castes or Scheduled Tribes in one State may not necessarily enjoy the same status in another State. The social, economic, educational, and historical factors considered for granting Scheduled Castes or Scheduled Tribes status in one region may not exist in another region to which members of that caste or tribe may

¹⁶ L.P. Vidyarthi & B.K. Rai, *The Tribal Culture of India* (Concept Publishing Company, 1977).

¹⁷ INDIA CONST. art. 366, cl. (25).

migrate. It is possible that a caste or tribe having the same name may be recognised in two different States, but the reasons for such recognition and the level of social disadvantage suffered by them may differ significantly. Therefore, merely because a caste is recognised as a Scheduled Caste or Scheduled Tribe in one State does not automatically entitle a person belonging to that caste in another State to claim the same constitutional benefits, rights, or privileges. This distinction was clearly contemplated by the framers of the Constitution, as reflected in the language of Articles 341 and 342.¹⁸

V. Constitution (Scheduled Castes) Order, 1950

The Constitution (Scheduled Castes) Order, 1950¹⁹ is an important Presidential Order issued under Article 341(1) of the Constitution of India. Its main purpose is to identify and list those castes, races, and tribes that are recognised as Scheduled Castes in different States and Union Territories. These communities are provided constitutional protections and benefits such as reservation in education, government employment, and political representation.

The Order contains separate lists for different States because the social and historical conditions of communities vary from one region to another. Only those communities specifically mentioned in the list are entitled to claim Scheduled Caste status and receive the benefits available to SCs under the Constitution. One of the most significant features of the 1950 Order is Paragraph 3, which deals with religion and Scheduled Caste status. Originally, the Order provided that a

¹⁸ *Action Committee on Issue of Caste Certificate to Scheduled Castes and Scheduled Tribes in the State of Maharashtra v. Union of India*, (1994) 5 SCC 244.

¹⁹ *The Constitution (Scheduled Castes) Order, 1950*, available at: <https://anagrasarkalyan.gov.in/documnts/07-07-2017-11-33-12.pdf>

person who did not profess the Hindu religion could not be considered a member of a Scheduled Caste. Later, this provision was amended to include Sikhs in 1956 and Buddhists in 1990.

In *Punjabrao v. D.P. Meshram*,²⁰ the Supreme Court interpreted Clause 3 of the Constitution (Scheduled Castes) Order, 1950, which provides that only persons professing Hinduism or Sikhism (later Buddhism was also included) can claim Scheduled Caste status. The Court explained that the word “profess” means openly declaring and following a particular religion. Therefore, a person’s religion is determined not merely by private belief but by public declaration and conduct. The Court observed that if a person publicly states that he has given up Hinduism and accepted another religion, he would be considered as professing the new religion. In such a situation, it is unnecessary to further examine whether the conversion ceremony was fully valid or effective. What is important is the clear and open acceptance of another faith. The judgment further clarified that once a person openly renounces Hinduism, he cannot continue to claim the benefits available under the Constitution (Scheduled Castes) Order, 1950. Thus, Scheduled Caste status depends not only upon caste origin but also upon the religion publicly professed by the individual. The above interpretation makes it clear that the word “profess” means openly declaring or practising a particular religion. It refers to a public expression of one’s religious faith that can be recognized by society. Therefore, it is not limited to an individual’s personal belief or private thoughts, but requires some outward and visible manifestation of religious identity and practice. The constitutional position of Scheduled Castes and Scheduled Tribes is not the same. Scheduled Castes are subject to religion-based restrictions under the Constitution

²⁰ *Punjabrao v. D.P. Meshram*, AIR 1965 SC 1179.

(Scheduled Castes) Order, 1950, whereas Scheduled Tribes are not subject to any such explicit religious limitation. The concept of Scheduled Castes is closely connected with the caste system and the historical practice of untouchability within Hindu society. Therefore, conversion to another religion may affect the Scheduled Caste status of an individual.

In contrast, Scheduled Tribe status is mainly based on tribal identity, ancestry, customs, culture, and geographical association rather than religion alone. Tribal communities are identified through their traditional social practices, cultural characteristics, and ethnic identity. As a result, conversion from one religion to another does not automatically lead to the loss of Scheduled Tribe status. This distinction exists because tribal identity is considered more cultural and ethnic in nature, while Scheduled Caste identity has historically been linked to caste-based discrimination within a particular religious social structure. Consequently, there is no provision similar to Paragraph 3 of the Constitution (Scheduled Castes) Order, 1950 in relation to Scheduled Tribes

VI. Freedom of Religion under Article 25

Article 25²¹ guarantees every person the freedom of conscience and the right to freely profess, practise, and propagate religion. This means that every individual has the liberty to follow the religion of their choice and to spread or explain the teachings of their religion to others. Religious conversion is often considered within the broader concept of religious freedom protected under Article 25. However, the right guaranteed under Article 25 is not absolute. It is subject to restrictions relating to public order, morality, health, and other Fundamental Rights provided under Part III of the Constitution. Therefore, the State has the authority to regulate religious activities if they disturb public peace or violate

²¹ INDIA CONST. art. 25.

constitutional principles.

The Supreme Court has clarified that the right to “propagate” religion does not include a fundamental right to convert another person to one’s own religion. Propagation only means spreading or communicating the beliefs and teachings of a religion. Article 25 protects the “freedom of conscience” of every individual, meaning that each person has the right to decide their religious beliefs independently. If a person attempts to convert another individual forcibly, fraudulently, or through undue influence, it may interfere with that person’s freedom of conscience. Therefore, Articles 25 and 26 expressly permit reasonable restrictions on religious freedom in the interests of public order, morality, and health. This is why laws regulating religious conversion have been upheld in certain circumstances to maintain social harmony and protect individual freedom.²²

In *C. Selvarani v. The Special Secretary-cum-District Collector*,²³ the Court observed that India is a secular country where every citizen has the constitutional right under Article 25 to practise and profess any religion of their choice. The Court stated that a person may genuinely convert to another religion because of faith in its beliefs, principles, and spiritual teachings. However, the Court also clarified that religious conversion should not be used merely as a means to obtain reservation benefits. If a person changes religion only to secure the advantages available under reservation policies, without truly believing in or following that religion, such conversion should not be encouraged. According to the Court, granting reservation benefits in such cases would go against the real purpose and social objective of the reservation system.

²² *Rev. Stainislaus v. State of Madhya Pradesh*, (1977) 1 SCC 677.

²³ *C. Selvarani v. The Special Secretary-cum-District Collector*, 2024 INSC 900.

VII. Effect of conversion and Judiciary

In the Supreme Court judgment of *Puneet Rai v. Dinesh Chaudhary*,²⁴ S.B. Sinha, J. has observed thus: “Traditionally, a person belongs to a caste in which he is born. The caste of the parents determines his caste but in case of reconversion a person has the liberty to renounce his casteless status and voluntarily accept his original caste. His caste status at birth is not immutable. Change of religion does not necessarily mean loss of caste. If the original caste does not positively disapprove, the acceptance of the caste can be presumed. Such acceptance can also be presumed if he is elected by a majority to a reserved seat. Although it appears that some dent is made in the classical concept of caste, it may be noticed that the principle that caste is created by birth is not dethroned. There is also a judicial recognition of caste autonomy including the right to outcaste a person.”²⁵

In *N.E. Horo v. Smt. Jahan Ara Jaipal Singh*,²⁶ the Supreme Court considered whether a woman from Ceylon who married a member of a Scheduled Tribe would automatically acquire the tribal status of her husband. The Court held that marriage alone does not make a woman a member of a Scheduled Tribe. The Court stated that she could be recognised as a member of the tribe only if the tribal community accepted her as one of its members and such acceptance was approved by the tribal Panchayat.

In *The Principal Guntur Medical College v. Y. Mohan Rao*,²⁷ the Court held that the benefits available to a Scheduled

²⁴ *Puneet Rai v. Dinesh Chaudhary*, (2003) 8 SCC 204

²⁵ S.B. Wad, *Caste and the Law in India* 30 (Documentation Centre for Corporate & Business Policy Research, New Delhi, 1984).

²⁶ *N.E. Horo v. Smt. Jahan Ara Jaipal Singh*, AIR 1972 SC 1840.

²⁷ *The Principal, Guntur Medical College v. Y. Mohan Rao*, (1976) 3 SCC 411.

Caste person can be claimed only when the individual or his parents had converted to Christianity and the person was later reconverted to Hinduism while also continuing to follow the customs, traditions, and social practices of the original caste community. However, the Court clarified that these benefits would not generally extend to a person whose grandparents had converted to Christianity, since the connection with the original caste and its social disabilities may no longer continue in the same manner.

In *C.M. Arumugam v. S. Rajgopal*,²⁸ the Supreme Court examined the relationship between caste and religious conversion. The Court observed that, as a general rule, conversion from Hinduism usually results in loss of caste because caste is traditionally associated with Hindu society. Therefore, a person who ceases to be a Hindu is ordinarily not accepted by members of the caste as belonging to the same social group. However, the Court clarified that the effect of conversion depends upon the nature, structure, and customs of the particular caste. In some castes, membership is closely linked to Hindu religion, and therefore conversion would result in exclusion from the caste. In other situations, where caste has evolved more as a social, economic, or occupational group rather than a purely religious one, conversion may not necessarily lead to loss of caste identity. The Court further noted that in certain parts of South India, it is common for individuals who convert to Christianity to continue being recognised as members of their original caste. This happens because the social ties, customs, and community relationships remain strong despite the change in religion. Therefore, the question of whether conversion results in loss of caste must be determined according to the customs and social structure of each caste community.

²⁸ *C.M. Arumugam v. S. Rajgopal*, AIR 1976 SC 939.

VIII. Chinthada Anand Case and the Present Legal Position

The Supreme Court recently in *Chinthada Anand v. State of Andhra Pradesh and Ors.*²⁹ explained the important principles relating to the Constitution (Scheduled Castes) Order, 1950 and the Constitution (Scheduled Tribes) Order, 1950. It stated that a person claiming the status of Scheduled Caste or Scheduled Tribe must clearly prove that he or she belongs to a caste or tribe specifically mentioned in the Presidential Orders issued under Articles 341 and 342 of the Constitution.

The Court clarified that under Clause 3 of the Constitution (Scheduled Castes) Order, 1950, only persons professing Hinduism, Sikhism, or Buddhism can claim Scheduled Caste status. If a person converts to any other religion, such as Christianity or Islam, the person immediately loses Scheduled Caste status, regardless of birth or family background. The Court further observed that a person cannot simultaneously practise another religion and at the same time claim the benefits available to Scheduled Castes. Constitutional protections such as reservation, statutory benefits, and other privileges attached to Scheduled Caste status are available only to those who satisfy the conditions laid down in the 1950 Order. Therefore, once Scheduled Caste status is lost due to conversion, all related benefits also automatically come to an end.

The Court also discussed the conditions required for restoring Scheduled Caste status after reconversion to Hinduism, Sikhism, or Buddhism. First, the individual must prove that he or she originally belonged to a caste recognised under the Constitution (Scheduled Castes) Order, 1950.

²⁹ *Chinthada Anand v. State Of Andhra Pradesh And Ors*, 2026 LiveLaw (SC) 288

Secondly, there must be genuine and convincing evidence showing reconversion and complete abandonment of the previously followed religion. The person must also resume the customs, traditions, rituals, and practices of the original caste community. In addition, the caste community must accept the individual as one of its members. A mere personal statement claiming reconversion is not enough. The burden of proof lies completely on the person making the claim, and failure to satisfy any one of these conditions would result in rejection of the claim.

The Court distinguished the position of Scheduled Tribes from that of Scheduled Castes. Unlike the Constitution (Scheduled Castes) Order, 1950, the Constitution (Scheduled Tribes) Order, 1950 does not impose any religion-based restriction. Therefore, conversion alone does not automatically take away Scheduled Tribe status. The Court stated that tribal identity is mainly based on tribal customs, culture, social organisation, community life, ancestry, and recognition by the tribal community. If these characteristics continue even after conversion, the person may still retain Scheduled Tribe status. However, if conversion results in complete separation from tribal customs and loss of recognition by the tribal community, the basis for claiming Scheduled Tribe status may no longer exist. The Court finally observed that such matters depend on the facts and circumstances of each individual case and must be decided by the competent authority according to constitutional principles.

IX. Critical Analysis of *Chinthada Anand v. State of Andhra Pradesh*³⁰

The decision provides important clarity regarding the constitutional position of Scheduled Castes and Scheduled

³⁰ *Chinthada Anand v. State Of Andhra Pradesh And Ors*, 2026 LiveLaw (SC) 288

Tribes after religious conversion. The judgment strengthens the interpretation of Clause 3 of the Constitution (Scheduled Castes) Order, 1950 by reaffirming that Scheduled Caste status is closely connected with religion and cannot continue once a person converts to a religion not recognised under the Order. The Court's insistence on strict proof for reconversion and community acceptance aims to prevent misuse of reservation benefits and maintain the integrity of the constitutional scheme of affirmative action.

One of the major strengths of the judgment is its distinction between Scheduled Castes and Scheduled Tribes. The Court correctly recognised that Scheduled Tribe identity is primarily based on tribal culture, customs, ethnicity, and community life rather than religion alone. This interpretation reflects the social reality that tribal identity often survives religious conversion. By refusing to impose an automatic religion-based disqualification on Scheduled Tribes, the Court adopted a more flexible and sociological approach consistent with Articles 341³¹ and 342³² of the Constitution.

The judgment also attempts to balance two competing constitutional principles: the right to religious freedom under Article 25 and the objective of reservation policies under Articles 15(4), 16(4), and 46. The Court emphasised that constitutional benefits meant for historically disadvantaged groups should not be extended merely on the basis of strategic or opportunistic conversion and reconversion. In this respect, the ruling seeks to preserve the original purpose of reservations, namely the upliftment of communities suffering from historical discrimination and social exclusion.

However, the judgment may also be assessed on certain grounds. The strict application of Clause 3 of the Constitution

³¹ INDIA CONST. art. 341.

³² INDIA CONST. art. 342

(Scheduled Castes) Order, 1950 continues to raise concerns regarding equality and secularism. Critics argue that caste-based discrimination does not disappear merely because a person changes religion. Dalit Christians and Dalit Muslims often continue to suffer social and economic discrimination similar to that faced by Hindu Scheduled Castes. Therefore, automatic denial of Scheduled Caste status after conversion may undermine the constitutional guarantee of equality under Articles 14³³ and 15³⁴.

Another debate relates to the requirement of community acceptance after reconversion. Although community recognition may be socially relevant, making it a legal requirement can create uncertainty and subjectivity. Acceptance by the caste community may depend on social prejudice, local politics, or arbitrary practices, thereby placing excessive power in the hands of community groups rather than constitutional authorities. This may create difficulties for genuine converts seeking restoration of their caste identity. Further, the judgment leaves significant discretion with administrative authorities to determine whether a person has genuinely retained tribal customs and community ties. While this flexible approach is useful in Scheduled Tribe cases, it may also lead to inconsistent decisions and administrative arbitrariness. The absence of clear guidelines regarding what constitutes sufficient continuation of tribal identity could result in unequal treatment across different states and communities.

X. Conclusion

The issue of religious conversion and the continuation or loss of Scheduled Caste and Scheduled Tribe status is one of the most difficult and debated issues in Indian constitutional law. It involves questions relating to religion, social identity, equality,

³³ INDIA CONST. art. 14.

³⁴ INDIA CONST. art. 15.

and reservation policies. Articles 341³⁵ and 342³⁶ of the Constitution was introduced to protect historically disadvantaged communities by providing reservations and other constitutional safeguards. However, the law treats Scheduled Castes and Scheduled Tribes differently after religious conversion, which has led to serious constitutional and social debate.

Under the Constitution (Scheduled Castes) Order, 1950, Scheduled Caste status depends not only on birth and social disadvantage but also on the religion followed by the person. According to the present legal position, if a Scheduled Caste person converts to a religion other than Hinduism, Sikhism, or Buddhism, he or she loses SC status and the benefits attached to it. On the other hand, the position of Scheduled Tribes is different because tribal identity is mainly based on culture, customs, ethnicity, and community life rather than religion alone. Therefore, conversion does not automatically result in the loss of Scheduled Tribe status unless the person completely abandons tribal customs and community ties.

The judiciary, through decisions such as *C.M. Arumugam v. S. Rajgopal*³⁷, *Puneet Rai v. Dinesh Chaudhary*, *The Principal Guntur Medical College v. Y. Mohan Rao*,³⁸ and *Chinthada Anand v. State of Andhra Pradesh*,³⁹ has tried to balance religious freedom, equality, and the purpose of reservation policies. The courts have repeatedly stated that reservation benefits should not be misused through false or opportunistic conversions and reconversions. At the same time,

³⁵ INDIA CONST. art. 341.

³⁶ INDIA CONST. art. 342.

³⁷ *C.M. Arumugam v. S. Rajgopal*, AIR 1976 SC 939.

³⁸ *Puneet Rai v. Dinesh Chaudhary*, (2003) 8 SCC 204

³⁹ *Chinthada Anand v. State Of Andhra Pradesh And Ors*, 2026 LiveLaw (SC) 288

the courts have also recognised that caste and tribal identities may continue even after a person changes religion. However, the continued exclusion of Dalit Christians and Dalit Muslims from Scheduled Caste status raises important questions about equality and secularism. In reality, many converted Dalits still face social discrimination, economic backwardness, and caste-based exclusion even after changing religion. Because of this, many scholars and social activists argue that caste discrimination does not disappear simply because a person changes religion. Therefore, the religion-based restriction under the Constitution (Scheduled Castes) Order, 1950 continues to remain controversial.

The difference in treatment between Scheduled Castes and Scheduled Tribes also highlights an important constitutional issue regarding identity. While caste has traditionally been connected with the Hindu social system and untouchability, tribal identity has been treated more as a cultural and ethnic identity that can continue even after religious conversion. Although this distinction is recognised under the law, changing social realities may require a reconsideration of the present legal framework.

In conclusion, the law relating to religious conversion and status of Scheduled Castes and Scheduled Tribes in India is still developing through court decisions and constitutional debate. Any future reform must strike a balance between protecting genuinely disadvantaged communities and preventing misuse of reservation benefits. A fairer and more practical approach may require the State to focus not only on religion, but also on whether social discrimination and backwardness continue even after conversion. Such an approach would better support the constitutional values of equality, dignity, secularism, and social justice.