

From Affirmative Action to a Critical Analysis of Reservation Policy on Caste Basis in India Under the Indian Constitution

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Abstract

The policy of caste-based reservation in India represents one of the most significant constitutional experiments in the pursuit of social justice and substantive equality. Rooted in the historical realities of caste oppression, exclusion, and systemic denial of opportunities, reservation was conceived as a form of affirmative action to uplift socially and educationally backward classes, Scheduled Castes, and Scheduled Tribes. The Indian Constitution, through Articles 15 and 16, explicitly authorises the State to adopt special measures in education and public employment, thereby redefining equality as an enabling and corrective principle rather than a purely formal one. This research paper critically examines the evolution of caste-based reservation under the Indian constitutional framework, tracing its philosophical foundation, institutional development, and judicial interpretation. It analyses the historical context of the Indian caste system and explains why the Constitution makers consciously classified Indian society into different groups for affirmative action. The study further evaluates the role of backward class commissions, particularly the Kaka Kalelkar Commission, the Mandal Commission, and the Justice Rohini Commission, in shaping reservation policies and addressing emerging inequities within backward classes themselves. The paper also undertakes a detailed examination of landmark Supreme Court judgments such as *State of Madras v. Champakam Dorairajan*, *Indra Sawhney v. Union of India*, *M. Nagaraj v. Union of India*, and *Jarnail Singh v. Lachhmi Narain Gupta*, highlighting how judicial scrutiny has imposed constitutional limitations such as the 50% ceiling, the creamy layer principle, and the requirement of quantifiable data. These cases demonstrate the judiciary's role in balancing social justice with administrative efficiency and constitutional morality. Through comparative charts and analytical discussion, the research highlights how the reservation framework has evolved since independence, particularly after constitutional amendments and commission-led reforms. While reservation has significantly improved representation and access for marginalised communities, the paper argues that challenges such as unequal benefit distribution, political misuse, and stagnation of criteria necessitate continuous review. The study concludes that caste-based reservation is not an exception to equality but a constitutionally sanctioned instrument for achieving real and inclusive equality. However, for the policy to remain effective and just, it must be periodically reassessed in light of changing social

conditions, constitutional principles, and the broader goal of a welfare state.

Keywords: Caste-Based Reservation, Affirmative Action, Social Justice, Equality, Indian Constitution, Backward Classes, Supreme Court Judgments, Constitutional Amendments.

Introduction

The Indian Constitution is built on the ideals of equality, justice, and dignity for every citizen. However, Indian society has long been shaped by the caste system, which created deep and lasting inequalities. Large sections of the population were subjected to discrimination, social exclusion, and economic hardship simply because of their caste position. Recognising that formal equality alone could not correct these historical injustices, the framers of the Constitution adopted caste-based reservation as a form of affirmative action to achieve substantive equality.

The constitutional basis of reservation is found mainly in Articles 15(4), 15(5), 16(4), and 16(4A). These provisions empower the State to make special arrangements for the advancement of socially and educationally backward classes, as well as Scheduled Castes and Scheduled Tribes, particularly in the fields of education and public employment. By allowing differential treatment for disadvantaged groups, these provisions depart from the traditional notion of equality and acknowledge that treating unequals equally would only perpetuate inequality.

To identify backward classes and design effective reservation policies, the State has relied on various commissions over the years. The Kaka Kalelkar Commission was the first nationwide effort to study socially and educationally backward classes, though its recommendations were largely set aside due to disagreements over methodology. A more decisive intervention came with the Mandal Commission, which identified Other Backward Classes primarily on social indicators and recommended 27% reservation in public employment. More recently, the Justice Rohini Commission was set up to examine the unequal distribution of reservation benefits among OBC communities, highlighting concerns that certain groups have disproportionately benefitted from the policy.

The Supreme Court of India has played a crucial role in defining the scope and limits of caste-based reservation. In *State of Madras v. Champakam Dorairajan* (1951), the Court struck down caste-based communal reservations, prompting the First Constitutional Amendment and the insertion of Article 15(4). The landmark decision in *Indra Sawhney v. Union of India* (1992) upheld the constitutionality of OBC reservations while laying down important principles such as the 50% ceiling on reservations, the exclusion of the creamy layer, and the prohibition on reservation in promotions. Although the bar on promotion was later relaxed for SCs and STs, subsequent judgments like *M. Nagaraj v. Union of India* and *Jarnail Singh v. Lachhmi Narain Gupta* imposed conditions such as the need for quantifiable data and consideration of administrative efficiency.

In conclusion, caste-based reservation in India reflects an ongoing attempt to balance the constitutional promise of equality with the demand for social justice. While it has played a significant role in empowering historically marginalised communities, it continues to raise complex constitutional and political questions about fairness, efficiency, and its future direction in a changing society.

Definitions

Affirmative Action

Affirmative action denotes a set of policies adopted by the State to address historical disadvantage

by expanding opportunities in education, employment, and public life for groups that have been systematically marginalised.

Reservation

Reservation is a constitutional device through which a specified proportion of seats or positions is earmarked for Scheduled Castes, Scheduled Tribes, Other Backward Classes, and Economically Weaker Sections, with the aim of securing fair representation and equal access to opportunities.

Backward Classes

Backward classes refer to communities that suffer from social and educational disadvantage and are formally identified by the State through constitutional and statutory processes, particularly under Article 340 of the Constitution.

Creamy-Layer

The creamy layer denotes the relatively advanced segment within the Other Backward Classes that is excluded from reservation benefits so that affirmative action is directed towards those who are genuinely disadvantaged.

Research Objectives

1. To examine the constitutional basis of caste-based reservation under the Indian Constitution.
2. To analyse the role of affirmative action in addressing historical caste-based inequalities.
3. To study the contribution of backward class commissions in shaping reservation policy.
4. To critically evaluate landmark judicial decisions related to reservation.
5. To analyse the effectiveness and limitations of the present reservation framework.

Research Hypothesis

- Caste-based reservation is constitutionally justified as a means of achieving substantive equality.
- Reservation policies have contributed to social mobility of marginalised communities but suffer from implementation gaps.
- Judicial intervention has played a crucial role in balancing equality and social justice.
- Absence of periodic review weakens the effectiveness of reservation policies.

Research Methodology

This research follows a doctrinal and analytical approach. Primary sources for the study include constitutional provisions, judgments of the Supreme Court of India, and reports of various commissions. Secondary sources consist of books, scholarly articles, and relevant reports. A critical perspective has been adopted to assess the effectiveness and impact of reservation policies.

Constitutional foundation and early years

The Indian caste system is among the oldest and most entrenched forms of social stratification in the world. Traditionally grounded in hereditary occupation, social hierarchy, and notions of ritual purity, it

originated from the varna framework, which broadly classified society into Brahmins, Kshatriyas, Vaishyas, and Shudras. Communities placed outside this framework were treated as “untouchables” and subjected to extreme forms of social exclusion. Over time, this system hardened into a rigid and hierarchical social order, resulting in widespread discrimination and oppression. Large sections of the population—particularly those now identified as Scheduled Castes and Scheduled Tribes—were systematically denied access to education, religious institutions, public spaces, and employment opportunities. This entrenched exclusion produced generations of social, educational, and economic disadvantage, creating deep-rooted structural inequality.

At the time of independence, the Constituent Assembly was acutely conscious of the fact that political freedom would be hollow without social justice. The framers recognised that centuries of caste-based discrimination could not be undone merely by proclaiming equality before the law. Accordingly, Indian society was constitutionally classified into categories such as Scheduled Castes, Scheduled Tribes, and Other Backward Classes. This classification was not intended to reinforce caste identities, but rather to dismantle caste as a system of oppression. It was conceived as a corrective and transitional mechanism aimed at uplifting historically marginalised communities and integrating them into the social, economic, and political mainstream.

The Constituent Assembly clearly understood that a purely formal conception of equality would allow inherited caste privilege to remain intact while historical disadvantage continued in subtler forms. The Constitution therefore adopted a substantive vision of equality by recognising caste as a source of structural inequality that required targeted remedies. Articles 15, 16, 17, 18, and 29 must be read together as a coherent constitutional response to caste-based injustice, rather than as isolated provisions. Article 15 establishes the foundational principle of non-discrimination on grounds of caste and other prohibited categories. Article 15(1) constitutionally rejects caste as a legitimate basis for exclusion. However, the framers were conscious that a prohibition on discrimination alone would fail to address the accumulated effects of centuries of deprivation. Article 15(4) therefore operates as a corrective measure, empowering the State to make special provisions for socially and educationally backward classes and for Scheduled Castes and Scheduled Tribes. Reservation in education under Article 15(4) is not an exception to equality, but a means of realising the equality guaranteed under Article 15(1). Article 15(5) further reinforces this commitment by ensuring that the expansion and privatisation of education do not dilute the constitutional mandate of social justice.

This educational empowerment under Article 15 is intrinsically linked to Article 16, which governs equality of opportunity in public employment. While Article 16(1) guarantees formal equality of opportunity, such equality would remain illusory in a society marked by entrenched caste hierarchies. Upper-caste groups historically enjoyed access to education, social networks, and positions of power, whereas lower-caste communities were systematically excluded from State services. Article 16(4) therefore bridges this gap by permitting reservation in public employment for backward classes, translating educational access into participation in governance. Article 16(4A) deepens this framework by recognising that representation must extend beyond entry-level positions to higher levels of decision-making. Without promotion, caste hierarchies would simply be reproduced within the administrative structure. Article 16(4B), which allows the carry-forward of unfilled vacancies, further reinforces this objective by acknowledging that historical exclusion cannot be remedied through rigid procedural constraints.

Together, Articles 15 and 16 create a constitutional pathway of social mobility—from access to

education, to public employment, and ultimately to positions of authority—designed specifically to dismantle caste-based exclusion.

Article 17 provides the moral and constitutional foundation for this entire framework by abolishing untouchability in absolute terms. Untouchability represented the most extreme manifestation of caste oppression, denying basic dignity and humanity to entire communities. By constitutionally condemning this practice, Article 17 delegitimises the social ideology that historically justified exclusion from education, employment, and public life. Reservation policies draw their ethical legitimacy from Article 17, as they seek to remedy the consequences of practices that the Constitution itself declares fundamentally unjust. In this context, affirmative action is not preferential treatment but a constitutional response to a constitutional wrong.

Article 18 complements this anti-caste framework by abolishing titles that create artificial hierarchies of rank and status. While caste hierarchy operated informally, titles reinforced inequality in formal and symbolic terms. By rejecting titles (except academic and military distinctions), Article 18 reinforces the egalitarian ethos pursued materially through reservation policies.

Article 29 further integrates equality with dignity and cultural autonomy. Article 29(2) ensures that access to State-funded educational institutions cannot be denied on grounds of caste, preventing exclusion even while reservation operates. This ensures that affirmative action does not degenerate into segregation. Article 29(1), on the other hand, protects the cultural identity of communities, particularly tribal and backward groups whose traditions and ways of life were historically suppressed. Thus, while Articles 15 and 16 promote inclusion, Article 29 ensures that inclusion does not result in cultural erasure.

When read together, Articles 15, 16, 17, 18, and 29 reflect a unified constitutional strategy: to dismantle caste as a system of hierarchy while employing caste-conscious measures to undo its historical consequences. The classification of Indian society into constitutional categories is therefore not a departure from equality, but the only realistic means of achieving it. Reservation is not an exception to equality; it is the mechanism through which equality acquires substantive meaning.

Kaka Kalelkar Commission (1953): The First Attempt to Operationalise Constitutional Equality

The Kaka Kalelkar Commission was constituted under Article 340 of the Constitution to identify socially and educationally backward classes and to recommend measures for their advancement. Its establishment was a direct outcome of Articles 15(4) and 16(4), which empower the State to adopt special provisions and reservation policies for backward classes.

The Commission relied primarily on caste as the principal indicator of backwardness, while also considering factors such as traditional occupation, educational attainment, and social discrimination. It acknowledged that caste-based exclusion had historically limited access to education and public employment, and accordingly recommended reservations in educational institutions and government services, along with scholarships and other welfare measures. However, due to internal disagreements and concerns that excessive reliance on caste might reinforce social divisions, the Commission's recommendations were not fully implemented. Nevertheless, the Kaka Kalelkar Commission laid the intellectual and constitutional groundwork for future affirmative action policies by formally recognising the close relationship between caste and social backwardness in India.

Mandal Commission (1979): Institutionalising OBC Reservation and Substantive Equality

The Mandal Commission represented a decisive moment in the evolution of India's reservation policy. Constituted under Article 340, it sought to give concrete effect to Articles 15(4) and 16(4) by systematically identifying Other Backward Classes. Unlike the earlier commission, the Mandal Commission adopted a multi-dimensional methodology, employing social, educational, and economic indicators to assess backwardness. It estimated that OBCs constituted approximately 52 per cent of India's population and recommended 27 per cent reservation in public employment and educational institutions, ensuring that overall reservation remained within constitutionally permissible limits.

Major Reforms Recommended:

- 27% reservation for OBCs in central government services
- Reservation in public sector undertakings and educational institutions
- Financial and educational assistance to promote social mobility

The implementation of the Mandal reforms was upheld by the Supreme Court in *Indra Sawhney v. Union of India* (1992), where the Court firmly anchored reservation within the constitutional principle of equality. At the same time, it laid down important safeguards, including the 50 per cent ceiling on reservations, the exclusion of the creamy layer, and an emphasis on adequate representation rather than proportional representation. Through this judgment, the Mandal Commission's recommendations were given constitutional legitimacy, transforming reservation from a purely welfare-oriented policy into a structured instrument of representation and social justice.

Justice Rohini Commission (2017): Reforming Reservation for Equitable Distribution

The Justice Rohini Commission was constituted to address emerging inequalities **within** the OBC category. Although OBC reservation was constitutionally validated, evidence showed that its benefits were being disproportionately cornered by a few dominant communities, leaving extremely backward groups marginalised.

The Commission's objective was to ensure that Article 16(4)'s requirement of adequate representation is meaningfully fulfilled by recommending sub-categorisation of OBCs.

Key Reform Objectives:

- Identify communities that have received little or no benefit of OBC reservation
- Propose sub-classification within OBCs for fair distribution of reservation
- Ensure that reservation aligns with the principle of substantive equality, not formal equality

The Justice Rohini Commission reflects the evolving constitutional understanding of equality, where reservation policies are periodically reviewed to prevent internal inequities and ensure that affirmative action reaches the most disadvantaged sections.

Case Studies (Judicial Interpretation of Caste-Based Reservation)

1. State of Madras v. Champakam Dorairajan (1951)

State of Madras v. Champakam Dorairajan (1951) was one of the earliest and most influential decisions on the issue of equality and reservation in India. The case arose from a government order issued by the State of Madras which allocated seats in educational institutions on the basis of caste and community. This system was challenged on the ground that it violated the constitutional guarantee of equality.

The Supreme Court held that the communal reservation scheme was unconstitutional as it conflicted with Article 15(1) of the Constitution, which prohibits discrimination solely on the basis of caste, religion, race, sex, or place of birth. At the time, the Constitution did not contain any provision permitting the State to make special arrangements for backward classes in matters of education. The Court therefore adopted a strict interpretation of equality and emphasised that fundamental rights could not be overridden by executive policy.

Although the judgment invalidated caste-based reservations, its wider impact was transformative. The decision highlighted the limitations of formal equality in a society marked by deep social inequalities. In response, Parliament enacted the First Constitutional Amendment in 1951, introducing Article 15(4), which expressly empowered the State to make special provisions for socially and educationally backward classes and for Scheduled Castes and Scheduled Tribes. As a result, the case became a turning point in the evolution of India's affirmative action policy, laying the groundwork for a more substantive understanding of equality under the Constitution.

2. Indra Sawhney v. Union of India (1992)

Indra Sawhney v. Union of India (1992) is a landmark judgment that fundamentally shaped the constitutional framework governing reservation in India. The case arose from the implementation of the Mandal Commission's recommendations, which provided for 27 per cent reservation for Other Backward Classes in public employment. The constitutional validity of this policy was challenged on the ground that it violated the principle of equality.

The Supreme Court upheld the reservation for OBCs under Article 16(4), recognising that equality under the Constitution is not merely formal but substantive in nature. The Court affirmed that the State is constitutionally empowered to take affirmative measures to ensure adequate representation of backward classes in public services. At the same time, the judgment imposed important constitutional limitations to prevent misuse of reservation policies.

One of the most significant contributions of the decision was the introduction of the 50 per cent ceiling on total reservations, except in extraordinary circumstances. The Court also evolved the concept of the "creamy layer," holding that socially advanced sections among OBCs must be excluded from reservation benefits to ensure that affirmative action reaches the genuinely backward. Further, the Court clarified that Article 16(4) permits reservation to achieve adequate representation, not proportional representation, and ruled that reservation in promotions was impermissible under Article 16(4) (a position later modified for SCs and STs through constitutional amendments).

The *Indra Sawhney* judgment thus struck a careful balance between social justice and constitutional equality. It transformed reservation from a purely welfare-oriented measure into a constitutionally regulated tool of representation, laying down enduring principles that continue to guide India's affirmative action policy.

3. M. Nagaraj v. Union of India (2006)

M. Nagaraj v. Union of India (2006) is a significant judgment that clarified the constitutional limits on reservation in promotion for Scheduled Castes and Scheduled Tribes. The case challenged the validity of constitutional amendments that enabled reservation in promotion with consequential seniority under Articles 16(4A) and 16(4B).

The Supreme Court upheld the constitutional amendments but imposed strict conditions on their implementation. It held that reservation in promotion is not an automatic right and that the State must justify such measures through concrete evidence. Before granting reservation in promotion,

the State is required to collect quantifiable data demonstrating the backwardness of the concerned class, their inadequate representation in public employment, and the need to maintain efficiency of administration as mandated under Article 335.

The Court emphasised that equality remains the basic feature of the Constitution, and any form of reservation must operate within its limits. By insisting on empirical data and periodic review, the judgment sought to prevent arbitrary or excessive use of reservation in promotion. At the same time, it recognised that affirmative action for SCs and STs is constitutionally permissible when supported by objective justification.

The *M. Nagaraj* decision thus balanced the goals of social justice and administrative efficiency, ensuring that reservation in promotion serves its intended purpose without undermining constitutional equality.

4. Jarnail Singh v. Lachhmi Narain Gupta (2018)

Jarnail Singh v. Lachhmi Narain Gupta (2018) is a landmark judgment that revisited and refined the principles laid down in *M. Nagaraj v. Union of India* concerning reservation in promotion for Scheduled Castes and Scheduled Tribes. The case arose from challenges to promotional reservations on the ground that the stringent requirements imposed in *M. Nagaraj* made the policy practically unworkable.

The Supreme Court upheld the validity of reservation in promotion under Articles 16(4A) and 16(4B) but modified an important aspect of the *M. Nagaraj* ruling. The Court held that the State is not required to collect fresh quantifiable data to prove the backwardness of Scheduled Castes and Scheduled Tribes, as their backwardness is constitutionally presumed. However, the requirement to demonstrate inadequate representation in public employment and to ensure maintenance of administrative efficiency under Article 335 was reaffirmed.

The Court also extended the “creamy layer” principle to Scheduled Castes and Scheduled Tribes in the context of reservation in promotion, emphasising that equality cannot be compromised by allowing the more advanced sections within these groups to monopolise benefits. This marked a significant step toward balancing social justice with the constitutional mandate of equality.

The *Jarnail Singh* judgment thus eased the evidentiary burden on the State while preserving essential safeguards against excessive or unjustified reservation. It represents an important evolution in affirmative action jurisprudence by aligning the objectives of social justice with the principle of substantive equality.

5. EWS Reservation Case (Janhit Abhiyan v. Union of India, 2022)

Janhit Abhiyan v. Union of India (2022) is a landmark judgment in which the Supreme Court upheld the constitutional validity of the Economically Weaker Sections (EWS) reservation introduced by the 103rd Constitutional Amendment. This amendment inserted Articles 15(6) and 16(6), providing up to 10 per cent reservation in education and public employment for economically weaker sections among the general category.

The challenge to the amendment was primarily based on the argument that reservation solely on economic criteria violated the basic structure of the Constitution and the principle of equality. It was also argued that excluding Scheduled Castes, Scheduled Tribes, and Other Backward Classes from EWS benefits was discriminatory. A five-judge Constitution Bench, by a majority, rejected these contentions and held that economic disadvantage can be a valid basis for affirmative action.

The Court ruled that the Constitution does not restrict reservation only to caste-based backwardness and that the State is empowered to address poverty and economic inequality through affirmative measures. It

further held that the exclusion of SCs, STs, and OBCs from EWS reservation does not violate equality, as these groups already benefit from separate reservation frameworks. The majority also held that the 50 per cent ceiling laid down in *Indra Sawhney* is not an inflexible rule and can be exceeded through a constitutional amendment.

The judgment is significant as it marks a shift in the understanding of affirmative action by recognising economic criteria as an independent basis for reservation. At the same time, the strong dissenting opinions cautioned that excluding historically disadvantaged groups and breaching the 50 per cent limit could dilute the core commitment to social justice. The *Janhit Abhiyan* case thus represents a crucial moment in the evolving constitutional discourse on equality and reservation in India.

Analysis with Reservation Charts

Chart 1: Reservation Scenario Immediately After Independence

Category	Basis	Reservation %	Key Feature
SC	Historical untouchability	15%	Focus on social exclusion
ST	Tribal isolation	7.5%	Geographical disadvantage
OBC	Not recognised	0%	No national policy
Total	—	~22.5%	Limited scope

Chart 2: Reservation After Amendments & Commission Reforms

Category	Basis	Reservation %	Reforms Introduced
SC	Social & historical oppression	15%	Promotion benefits
ST	Social + geographical factors	7.5%	Promotion + carry forward
OBC	Social & educational backwardness	27%	Creamy layer exclusion
EWS	Economic criteria	10%	103rd Amendment
Total	—	~59.5%	Judicial scrutiny

Recommendations

1. Reservation policies must be periodically reviewed using updated socio-economic data.
2. Greater emphasis should be placed on education and skill development rather than only quotas.
3. Sub-categorisation among OBCs should be implemented to ensure equitable benefit distribution.
4. The State, as a welfare State under the Directive Principles, must ensure quality education for all citizens to reduce long-term dependency on reservation.
5. A balance between merit, efficiency, and social justice must be constitutionally maintained

Conclusion

Caste-based reservation in India stands as one of the most ambitious constitutional efforts to reshape a deeply unequal social order. Conceived as an instrument of substantive equality, it was never meant to operate as a concession or privilege for particular groups, but as a corrective response to centuries of exclusion produced by the caste system. The framers of the Constitution consciously rejected a narrow, formal understanding of equality and instead embraced a vision of social justice that acknowledged historical disadvantage as a legitimate basis for differential treatment. This approach is clearly reflected

in Articles 15 and 16, which treat reservation not as a departure from equality, but as a means of making equality meaningful in a society marked by inherited inequalities. Article 17 further strengthens this framework by abolishing untouchability and constitutionally repudiating the moral legitimacy of caste-based exclusion. Read together, these provisions reveal a consistent constitutional philosophy that connects equality with dignity, representation, and social inclusion.

Judicial interpretation has played a decisive role in preserving this constitutional balance. Through landmark judgments such as *Indra Sawhney v. Union of India*, the Supreme Court upheld the validity of reservation while simultaneously laying down essential safeguards, including the 50 per cent ceiling, the exclusion of the creamy layer, and the requirement of adequate representation. These principles ensure that affirmative action remains aligned with constitutional values and does not undermine administrative efficiency or the broader guarantee of equality.

Backward class commissions have also been instrumental in shaping the evolution of reservation policy. While the Kaka Kalelkar Commission initiated the national conversation on backwardness, the Mandal Commission gave institutional form to OBC reservation through systematic data and empirical assessment. More recently, the Justice Rohini Commission has drawn attention to the unequal distribution of benefits within reserved categories, signalling a shift from a broad compensatory approach to a more nuanced and equitable framework of benefit-sharing. This evolution reflects an increasing constitutional sensitivity to internal disparities among backward classes.

At the same time, the post-independence experience exposes persistent challenges. Social mobility has remained uneven, and the benefits of reservation have often been concentrated among relatively advanced sections within reserved communities. These patterns raise legitimate concerns regarding efficiency, social cohesion, and the long-term sustainability of caste-based affirmative action. Addressing these concerns does not require the abandonment of reservation, but its careful constitutional recalibration. Periodic review of backwardness, effective enforcement of the creamy layer principle, a stronger emphasis on education as the primary instrument of empowerment, and closer alignment with the Directive Principles of State Policy are essential steps in this direction.

Ultimately, reservation must be understood as a means rather than an end. Its constitutional purpose is not to entrench caste identities, but to render them irrelevant by dismantling the structures of disadvantage they created. Only when affirmative action operates as a bridge towards a casteless, inclusive, and egalitarian society can it truly fulfil the promise of social justice envisioned by the Indian Constitution.

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