

# INTERNATIONAL JOURNAL OF LAW MANAGEMENT & HUMANITIES

[ISSN 2581-5369]

---

Volume 8 | Issue 1

---

2025

© 2025 *International Journal of Law Management & Humanities*

Follow this and additional works at: <https://www.ijlmh.com/>

Under the aegis of VidhiAagaz – Inking Your Brain (<https://www.vidhiaagaz.com/>)

---

This article is brought to you for “free” and “open access” by the International Journal of Law Management & Humanities at VidhiAagaz. It has been accepted for inclusion in the International Journal of Law Management & Humanities after due review.

In case of **any suggestions or complaints**, kindly contact [support@vidhiaagaz.com](mailto:support@vidhiaagaz.com).

---

**To submit your Manuscript** for Publication in the **International Journal of Law Management & Humanities**, kindly email your Manuscript to [submission@ijlmh.com](mailto:submission@ijlmh.com).

---

# Judicial and Policy Perspectives on Sub-Caste Categorization of Scheduled Castes: Challenges and Pathways for Social Justice in Andhra Pradesh and Telangana states

---

BSVVS. MURTHY<sup>1</sup>

## ABSTRACT

*The categorization of sub-castes under the Scheduled Castes (SC) category in India has been a complex issue, balancing the need for equity among marginalized communities with constitutional mandates. The Indian Constitution, through various articles, offers provisions for the upliftment of SCs, ensuring access to education, employment, and protection against discrimination. However, the diversity within the SC category has led to disparities in the distribution of benefits among sub-castes, raising demands for further sub-categorization. This article examines the Supreme Court of India's pivotal judgments on the matter, including the E.V. Chinnaiah case, which emphasized uniform treatment within the SC category. The article further explores the challenges faced by Andhra Pradesh and Telangana, where socio-economic variations among sub-castes have prompted debates on equitable distribution of reservations. It also discusses the constitutional provisions relevant to SC welfare and the barriers they present to state-level sub-caste categorization efforts. Through a review of legal perspectives and policy debates, this article proposes solutions for achieving social justice for all SC communities while adhering to constitutional principles. The analysis emphasizes the importance of data-driven policies and collaborative efforts between state and central governments in addressing intra-SC disparities, offering a path forward for balanced development and inclusivity.*

**Keywords:** Scheduled Castes, Indian Constitution, Socio-economic, Supreme Court.

## I. INTRODUCTION

India's caste system is a centuries-old social stratification that has shaped the socio-economic structure of the country. Among the most disadvantaged groups within this system are the Scheduled Castes (SCs), historically subjected to untouchability and systemic oppression. Recognizing this, the Indian Constitution provides special protections and affirmative action measures, including reservations in education, employment, and political representation.

---

<sup>1</sup> Author is a Research Scholar at Department of Law, Capital University, Jharkhand, India.

However, a key challenge within the SC category is the existence of multiple sub-castes with varying degrees of socio-economic status. Some sub-castes have benefitted more from reservation policies, while others remain marginalized. This disparity has led to debates over whether sub-castes should be categorized further to ensure a more equitable distribution of benefits. The Supreme Court of India has ruled on this issue multiple times, defining the boundaries within which categorization can occur. Andhra Pradesh and Telangana have been at the forefront of this debate, given their unique social landscape and history of demands for sub-caste categorization.

## II. HISTORICAL BACKGROUND OF SC CATEGORIZATION

The roots of caste-based discrimination in India trace back thousands of years, with the Varna system dividing society into hierarchical groups. The untouchables, now known as SCs, were excluded from social and economic life, facing extreme discrimination. During British rule, the categorization of these groups as "Depressed Classes" laid the groundwork for special treatment, culminating in the recognition of SCs in independent India.

After independence, the framers of the Constitution sought to redress historical injustices through affirmative action. Article 341 empowered the President of India to notify SCs, aiming to provide a uniform list across states. However, the socio-economic upliftment of SCs varied greatly, leading to imbalances within the category. In response, certain states like Andhra Pradesh sought to address these disparities through further sub-categorization, which became a contentious legal issue.

### (A) Supreme Court Judgments on SC Categorization

The Supreme Court's rulings have played a critical role in shaping the discourse on sub-caste categorization within SCs:

**1. *Indra Sawhney vs. Union of India (1992)*:** This judgment, which dealt with reservations for OBCs, upheld the principle of social justice, recognizing that reservations must address the needs of the most disadvantaged. While it did not directly address SC sub-caste categorization, it set a precedent for considering disparities within marginalized groups.

**2. *E.V. Chinnaiah vs. State of Andhra Pradesh (2004)*:** In this case, the Andhra Pradesh government had enacted legislation to categorize SCs into four sub-groups, aiming to ensure equitable distribution of reservations. The Supreme Court, however, struck down this legislation, ruling that the categorization violated Article 341, which provides that any changes to the SC list must come from the President of India. The judgment emphasized the need for

uniformity within the SC category, arguing that further sub-categorization could undermine the constitutional mandate of equal treatment for all SCs.

**3. *Jarnail Singh vs. Lachhmi Narain Gupta (2018)*:** This case, while focusing on reservations in promotions, reinforced the principle that backwardness and inadequate representation should be the basis for affirmative action. It highlighted the need for data-based policy decisions, which is relevant for the debate on SC sub-caste categorization, as it suggests that disparities among sub-castes must be supported by empirical evidence.

These rulings have shaped the legal landscape around sub-caste categorization, emphasizing the balance between constitutional principles and the need for social justice.

### III. CONSTITUTIONAL PROVISIONS FOR SCHEDULED CASTES

The Constitution of India offers several protections and provisions to uplift SCs, emphasizing equality and justice:

- Article 15(4) and 16(4): These articles empower the state to provide special provisions for the advancement of SCs, allowing for reservations in education and employment to promote equality of opportunity.
- Article 17- Abolishes untouchability, ensuring the dignity of SCs in all spheres of life.
- Article 46- Directs the state to promote the economic and educational interests of SCs and protect them from social injustice and exploitation.
- Article 34- Confers the power to specify SCs to the President of India, in consultation with the state, highlighting the role of the central government in any changes to the SC list.

*The SC/ST (Prevention of Atrocities) Act, 1989:*

The Act Provides legal recourse against discrimination and violence, reinforcing the rights and dignity of SCs.

These constitutional provisions create a framework for affirmative action, but the rigid interpretation of Article 341 has constrained states like Andhra Pradesh and Telangana in their attempts to address intra-SC inequalities through sub-categorization.

### IV. CHALLENGES OF SUB-CASTE CATEGORIZATION IN ANDHRA PRADESH AND TELANGANA

Andhra Pradesh and Telangana states face unique challenges related to SC categorization due to their diverse demographic composition. Within the SC category, several sub-castes exhibit

disparities in socio-economic conditions. Some groups have achieved better representation in public services and education, while others remain under represented.

After the bifurcation of Andhra Pradesh in 2014, both the states inherited these issues. The demands for sub-caste categorization have persisted, with community leaders advocating for a more nuanced approach to reservations. The challenge lies in balancing these demands with the Supreme Court's directive, which emphasizes uniform treatment within the SC category.

## V. DEBATES AND DISCUSSIONS ON EQUITABLE DISTRIBUTION OF SC BENEFITS

The debate over sub-caste categorization is multifaceted:

**1. Arguments for Sub-Categorization:** Advocates argue that a one-size-fits-all approach to SC reservations fails to address the needs of the most marginalized sub-castes. They suggest that sub-categorization would ensure that the benefits of reservations reach those who have historically been left out.

**2. Arguments Against Sub-Categorization:** Critics, including the Supreme Court in the *E.V. Chinnaiah* case, argue that such categorization could undermine the unity of the SC category and lead to divisiveness. They emphasize that the remedy lies in better implementation of existing policies rather than altering the basic structure of reservation policy.

Comparative analysis with states like Tamil Nadu, which have implemented internal reservations for OBCs, suggests that a data-driven approach could be effective, but it requires constitutional amendments to accommodate such changes for SCs.

## VI. PROPOSED SOLUTIONS AND THE WAY FORWARD

Addressing the challenges of intra-SC disparities requires a balanced approach that respects legal constraints while pursuing social justice:

**1. Comprehensive Data Collection:** States should conduct detailed surveys to assess the socio-economic conditions of different SC sub-castes. This data can serve as a basis for advocating changes at the state and central level.

**2. Policy Advocacy:** States like Andhra Pradesh and Telangana could work with the central government to propose amendments to Article 341, allowing for more flexibility in addressing sub-caste disparities. Categorisation of sub-castes in Scheduled Castes is not possible unless the Article 341 of Indian Constitution is amended

**3. Targeted Welfare Schemes:** Rather than altering reservation structures, states can design targeted schemes for particularly marginalized SC sub-castes, such as scholarships, skill development programs, and special economic assistance.

**4. Community Gangmen:** Involving community leaders and civil society in the policy-making process can ensure that the needs of all underprivileged groups in Scheduled Castes Community are addressed equitably.

## VII. CONCLUSION

The issue of sub-caste categorization under the Scheduled Castes is a complex legal and social challenge that requires a nuanced approach. While the Supreme Court has set boundaries for such categorization, the demand for equitable distribution of benefits remains pressing, especially in states like Andhra Pradesh and Telangana. Achieving the constitutional vision of social justice requires collaboration between state and central governments, grounded in data and guided by the principles of equality and fairness. Through thoughtful policy-making and a commitment to the welfare of all sub categorised SC communities, India can move closer to realizing the goal of an inclusive society where every marginalized group is uplifted.

### **1. Encouraging Research and Data Collection:**

To advocate for systematic research and data collection on SC's Socio-Economic status, supporting Article 46's mandate for the promotion of educational and economic interests of all sub-castes in SCs.

### **2. Building Resilience Against Discrimination:**

To empower SC communities to challenge discrimination effectively, reinforcing the objectives of Article 17, which abolishes untouchability and caste discrimination forbids its practice in any form, for which the states should act with stringent law enforcing machinery.

### **3. Policy Advocacy:**

States like Andhra Pradesh and Telangana could work with the central government to propose amendments to Article 341, allowing for more flexibility in addressing sub-caste disparities

This expanded version could be further enriched with specific case studies, data on SC distribution in AP and Telangana, and a more detailed analysis of legal provisions if desired.

\*\*\*\*\*

## VIII. REFERENCES

**1. Supreme Court Observer. "Sub-Classification Within Reserved Categories."** *This report summarizes the Supreme Court's 2024 judgment that upheld the validity of sub-classification within Scheduled Caste categories, overruling the earlier E.V. Chinnaiah decision.*

**2. Drishti IAS. "SC Allows for Sub-Classification of SCs and STs."** *This article discusses the Supreme Court's landmark verdict allowing states to sub-classify reserved category groups, such as SCs and STs, for reservation purposes.*

**3. Munich Personal RePEc Archive. "Scheduled Castes (SCs) and Tribes (STs) in Andhra Pradesh: A Brief Overview."** *This paper provides an overview of the SC and ST communities in Andhra Pradesh, highlighting the existence of multiple sub-castes with varying socio-economic statuses.*

**4. Liberation. "The Supreme Court Verdict on the SC/ST Sub-Classification."** *This commentary analyzes the Supreme Court's 2024 judgment on the legality of sub-classification of Scheduled Castes for reservation purposes.*

**5. SCC Online. "Decoding Sub-Classification in SCs."** *This article examines the legal aspects and implications of sub-classification within Scheduled Castes, with a focus on relevant Supreme Court judgments.*

**6. Devdiscourse. "Championing Change: Manda Krishna Madiga's Struggle for SC Sub-Categorisation."** *This piece highlights the efforts of Manda Krishna Madiga from Telangana in advocating for the sub-categorization of Scheduled Castes.*

**7. Wikipedia. "List of Scheduled Castes in Andhra Pradesh and Telangana."** *This page provides a comprehensive list of Scheduled Castes in Andhra Pradesh and Telangana, detailing the various sub-castes recognized in these states.*

**8. National Institute of Rural Development and Panchayati Raj. "Scheduled Castes & Scheduled Tribes."** *This section offers statistical data on Scheduled Castes and Scheduled Tribes, including information on area operated by size group and incidence of poverty.*

**9. Drishti IAS. "Sub-Categorisation of Scheduled Castes."** *This article delves into the historical context and legal developments related to the sub-categorization of Scheduled Castes in India.*

**10. Legal Bites. "Landmark Supreme Court Verdict on SC/ST Quota: Sub-Categorization Allowed."** *This article discusses the Supreme Court's landmark judgment*

*allowing the sub-categorization of Scheduled Castes and Scheduled Tribes for reservation purposes.*

\*\*\*\*\*