



CASE COMMENT: CHINTHADA ANAND V STATE OF ANDHRA PRADESH AND ORS.

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INTRODUCTION

The recent case of Chinthada Anand vs State of Andhra Pradesh¹ raises an important constitutional question regarding the relationship between religious conversion and the scheduled caste status in India. This question arose when Chinthada, who was born into the Madiga community but later converted to Christianity and served as a pastor, sought protection under the SC/ST Act, 1989,² after allegedly facing caste-based discrimination, abuse and violence. The High Court of Andhra Pradesh had quashed the proceedings, saying that the petitioner cannot claim protection under the Act after he converted to Christianity. Aggrieved by this decision, the appellant approached the Supreme Court, where the Supreme Court also upheld the High Court's decision and affirmed that a person who has voluntarily converted to Christianity cannot claim protection under the SC/ST (Prevention of Atrocities) Act, 1989.

FACTS OF THE CASE

Chinthada Anand, who is a resident of Kothapalem village, Guntur district, Andhra Pradesh, was born as a member of the scheduled class (SC) of the Madiga Community. He converted to Christianity and worked as a pastor for almost the last ten years. According to him, he faced assault and caste-based slurs by the members of the dominant community.

HISTORICAL BACKGROUND OF THE CASE

According to him, in December 2020, he began receiving abusive and intimidating phone calls from unknown numbers and was threatened to stop his religious activities as a pastor.

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¹ *Chinthada Anand V State of Andhra Pradesh* 2026 INSC 283

² Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act 1989

The first real incident, according to him, took place on 3 January 2021 when he was conducting Sunday prayers (at the house of Doma Koti Reddy); the accused called him outside and assaulted him- slapped him, abused him, used caste-based slurs and warned him against continuing Sunday prayers.

The second incident took place on 24 January 2021, while he was returning to his home after completing his Sunday prayers, when he was stopped by the accused and some other people on the way. They took his phone and beat him, abused him, and threatened to kill him. They even threatened to harm his family and kidnap his children if he did not stop his pastor activities.

On January 25, 2021, Chinthada Anand filed a written complaint in Chandole Police Station (FIR no.68 of 2021). The FIR was registered under Section 3(1)(r), Section 3(1)(s), Section 3(2) of the ST/SC (Prevention of Atrocities) Act, 1989 and under Section 341, 506, 323 read with Section 34 of the Indian Penal Code (IPC).

Chargesheet filed on 30 April 2021 before the court. Andhra Pradesh High Court quashed proceedings under Section 482 of the CrPC.³ The Supreme Court upheld the High Court's decision.

ISSUE BEFORE THE COURT

1. Whether a person who has undergone religious conversion can avail the statutory benefits granted to the members of the SC/ST Community under the SC/ST Act.
2. Whether caste-based discrimination continues despite religious conversion.
3. Whether the High Court was justified in quashing the proceedings.

RELEVANT LEGAL FRAMEWORK

Constitutional Provisions: Article 14:⁴ Right to equality (equality before law)

Article 15:⁵ Prohibition of discrimination

Article 17:⁶ Abolition of Untouchability

³ Code of Criminal Procedure 1973, s 482

⁴ Constitution of India, art 14

⁵ Constitution of India, art 15

⁶ Constitution of India, art 17

Article 25:⁷ Freedom of Religion

Article 341:⁸ Identification of Scheduled Castes

Key Statutes: SC/ST Act, 1989

Constitutional Instrument: Constitution (Scheduled caste) Order, 1950⁹

ARGUMENTS

Argument by petitioner: There is a Persistence of Caste despite conversion. A person's caste is decided by birth, not by religion. Even if someone converts, caste identity and the discrimination they face in society do not disappear.

There was a government order issued by the Andhra Pradesh government on 30 August 1997,¹⁰ which stated that even if a person from a Scheduled caste changes their religion, they should continue to get the same benefits they were entitled to before conversion.

The petitioner argued that denying the protection of the SC/ST Act to converted Dalits violates Article 14 of the Constitution of India, which says that the state shall not deny any person equality before law and equal protection of the law within India.

He also argued that a Dalit Christian faces the same social oppression as a Dalit Hindu, and thus the denial of protection violates Article 14 of the Constitution of India.

The petitioner further submitted that Article 25 of the Indian Constitution guarantees all persons the freedom of conscience and the right to freely profess, practice and propagate religion. It also includes the right to convert voluntarily based on conscience. Penalising conversion by withdrawing legal protection will set a bad example in society. It will violate our fundamental right under Article 25 of the Constitution of India.

Finally, he argued that the main aim of the SC/ST Act is to prevent caste-based atrocities. It is based on caste identity, not religion, and denying the protection of the law to a person who is being oppressed in the name of his caste defeats the purpose of the SC/ST Act.

⁷ Constitution of India, art 25

⁸ Constitution of India, art 341

⁹ Constitution (Scheduled Castes) Order 1950

¹⁰ Government of Andhra Pradesh, Government Order dated 30 August 1997

Arguments by respondent: According to the Constitution (scheduled caste) Order, 1950, a person will not be considered a scheduled caste if he follows a religion other than Hinduism, Sikhism, or Buddhism. For the SC/ST Act to apply, the victim must genuinely be a member of an SC/ST Community.

The appellant is admittedly a pastor and has been conducting Christian prayers for almost ten years. He openly follows and practices Christianity and thus should not be allowed to use the SC/ST Act. No dual identity should be allowed; a person should not claim the benefits of SC status while professing a religion excluded from SC classification.

In the case of *Soosai vs Union of India* 1985,¹¹ the Supreme Court affirmed that SC benefits are restricted to Hindu, Sikh, and Buddhist converts under the Constitution (SC) Order, 1950. The court ruled that converting to Christianity results in the loss of SC status, as Christians and Muslims do not face the same systemic “social and economic disabilities” justifying state protection. Thus, the court must maintain the doctrine of consistency.

JUDGEMENT

The Supreme Court upheld the judgment of the High Court of Andhra Pradesh, stating that a person who converts to Christianity forfeits their Scheduled Caste (SC) status and cannot claim protection under the SC/ST (Prevention of Atrocities) Act. Voluntary conversion leads to immediate loss of Scheduled Caste status.

REASONING FOR THE JUDGEMENT

The court asserts that Christianity, by its very theological foundation, does not recognise or incorporate the institution of caste. It quotes Galatians 3:28, which teaches all are one, effectively dissolving hierarchical distinctions. The appellant, who is a pastor who was born in the Madiga community (SC), was thus not entitled to the protections given by the SC/ST Act.

The court ruled that conversion to Christianity signifies exit from the Hindu caste framework. The appellant has admitted conversion. He is a pastor who occupies a position of leadership within the Christian faith, entrusted with the responsibility of preaching the gospel and conducting religious services in accordance with the Christian doctrine. He indubitably

¹¹ *Soosai v Union of India* 1985 Supp 3 SCR 242

professes Christianity, and thus the court cannot recognise the dual identity and rejects the idea that a person can be Christian by religion and still claim scheduled caste (SC) status.

The court also stated that the Supreme Court will uphold the primacy of Article 341,¹² according to which only the President can specify who qualifies as a scheduled caste. According to the Constitution (scheduled caste) Order, 1950, only Hindus, Sikhs and Buddhists can be treated as scheduled caste (SC).

According to a written reply to the Lok Sabha on 3 August 2021, the Minister of State for Social Justice and Environment, about “centrally sponsored scheme (CSS) to convert Christians- he said that CSS is meant for welfare and development, if SCs cannot be extended to converted Christians from the scheduled caste.

In this case, it is not the case of the appellant that at any stage, he had reconverted from Christianity to his original religion or to the Madiga community. This fact leaves no room for doubt that the appellant continues to remain a Christian on the day of the occurrence, not an SC.

CRITICAL ANALYSIS OF THE CASE

Scheduled Caste status is linked to religion: The Supreme Court affirmed that the scheduled caste (SC) status is legally connected to certain religions only, that is, Hinduism, Sikhism, and Buddhism. This interpretation comes from Article 341 of the Constitution that empowers the President of India to specify which castes, races, or tribes shall be deemed Scheduled Castes in relation to any particular State or Union Territory. And the Constitution (Scheduled Castes) Order, 1950. This judgment reinforces the idea that SC identity in law depends not only upon birth but also on the religion a person is following.

Law will follow the Constitution strictly: The judgment reinforces that the court must follow what is written in the Constitution, and thus it is following Article 341 and the Constitution (SC) Order, 1950. The court focused on the legal definition and said it is up to Parliament or the President only to change the rules related to the Scheduled Castes.

No dual identity: The court rejected the idea of dual identity; in this case, the court rejected the idea that someone can follow Christianity as a religion and also still claim the Scheduled

¹² Constitution of India, art 341

Castes benefits legally. According to the court, when a person voluntarily converts, their religious identity changes.

Judgment between two constitutional rights: This judgment indirectly also reinforces the tension between Article 25, which is the freedom to freely practice and choose any religion, and Article 341, which controls who can legally receive scheduled caste recognition and protections, according to the Constitution of India.

CONCLUSION

In conclusion, the judgment given by the Supreme Court gives us an important decision as it clarifies the legal position regarding the relationship between religious conversion and Scheduled Caste status under the Indian constitutional framework. The judgment reflects the Supreme Court's commitment to adhering to the constitutional scheme governing Scheduled Caste recognition. The case demonstrates that constitutional law often operates at the intersection of legal certainty and social realities. Even though the court has already given its judgment, this case still raises an important question relating to whether caste-based discrimination after conversion remains far from settled. For many, the judgment represents a victory for constitutional consistency; for others, it highlights the need to rethink whether legal protections should be determined solely by religious affiliation when social prejudice may continue irrespective of conversion. This case has also sparked debate about equality, dignity, religious freedom and the future of the caste-based protections in India.