

Uneven Governance: A Critical Analysis of Imbalance Influence on Hindu Temples in India Compared to Other Religious Places.

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Abstract

This paper examines the governance structures of Hindu temples in India by comparing them with other religious institutions. Using secondary data collection techniques, the paper seeks to provide a comprehensive analysis by analysing judgments, litigation, acts, articles and examples that illustrate the complexity of governance disparities in India. Historically, Hindu temples in India have worked within a framework that links religious practices to state governance, often leading to intricate control and influence dynamics. By analysing legal judgments, litigation and legislative acts, this paper highlights instances of unequal governance that have shaped Hindu establishment's administration, management and financial control. By comparing Hindu temples with other religious places, such as mosques, churches and gurudwara, the paper highlights disparities in governance mechanisms, resource allocation and institutional autonomy, all of which contribute to broader questions about religious freedom and secularism, as well as the perpetuation of inequality in governance. The paper also looks at socio-political factors which contribute to inequality in governance, including historical legacies, socio-economic disparities and power dynamics in religious communities.

Drawing on illustrative and case-based examples, the study highlights the practical consequences of unbalanced governance on temple functioning and integrity. The Critical Analysis of Hindu Temples in India provides an in-depth look at the complex relationship between religion, governance and social-cultural dynamics. The aim of this paper is to provide an in-depth analysis of the disparities and challenges faced by Hindu temples, and to contribute to the ongoing debate about the need for inclusive and justice-based governance frameworks that respect the principles of fairness, transparency and religious diversity.

Introduction

The idea of separating the religion from politics & state as whole is based on the western theory of separation of church from the governing body, i.e. The state as a whole, this idea of was mainly introduced in the new forming republic's of France & U.S.A as a way to counteract '*casesaropapacy*'¹ or in simple words '*divine right*'. It took many centuries for the western state to adopt the idea of separation of church & state.

¹ political system in which the head of the state is also the head of the church and supreme judge in religious matters

While in India the philosophy of governance as well as the culture were both entirely different. The philosophy of Indian governance can be traced back to *Arthashastra*² which states that God created the state for administering practical yet strict rules. Following this philosophy rulers of ancient India never had a proper distinction for religion and state.

Many researches like the finding of Pew Research Study state that vast majority of Indians are believers of God or a heavenly power regardless of their religion, which makes it more of a need to separate religion from the state control, however people tend to mix secularism with state control of religion. Secularism implies that individuals have the right to follow their own religion, It does not imply that the state has the authority or imply themselves as the head of religion in a state

Politics and religion together are complex and a hard to segregate mixture. In India, these two have been intertwined. Given the opinions and philosophies of some local and state governments, it is a sensitive and divisive topic for everyone in question. Religion for centuries had a major influence from people's cuisine to their clothing to influencing political decisions of their leaders

The question of who should control temples has come up more recently. As we are familiar with trusts and temple boards. However, what part does the government play in all of this? Did it treat the temples any differently than it treated other government-run organizations that are despised for their inefficiency and financial losses? Or does the government play a crucial role in defending the rights to these significant religious touchpoints?

Temple administration is done in secret. The merits of state control of temples and the disappointing results of decades of state control on several aspects of temple administration are

hotly debated in numerous forums. There is a clamour to free the temples from the Government's grasp. A private member's bill has been introduced in the parliament, and there are currently cases pending arguments in courts. The Supreme judicial decision in favor of turning over management of the Sree Padmanabhaswamy Temple in Kerala to the Travancore Royal Family³ overseeing it is the most recent judicial ruling.

Background of Unequal Governance

Hindu temples were subject to harsh laws during the Mughal and later British eras for a number of reasons, including the need to generate revenue and firmly established colonial interests. From generation to generation, these causes changed. Regretfully, this continued even after India gained its freedom from British colonial authority in 1947. Because to Article 26 of the Indian Constitution, people of all religions have the chance to supervise the activities of religious organizations that are significant to them. Despite having this freedom guaranteed by the nation's founding constitution, Hindus are not permitted to freely practice their faith. Most state governments have taken steps to seize control of Hindu establishments including temples,

² Ancient Indian Sanskrit treatise on statecraft, political science, economic policy and military strategy.

mutts⁴, and endowments³ through acts and legislation. This has given the government the chance to interfere with the management, customs, and rituals of the temples. In addition, the government has notable control of the Temple's assets and earnings.

Through the Hindu Religious and Charitable Endowments (HR & CE) Acts that they have passed in many different states, the state governments have seized the financial and managerial responsibility of more than one hundred thousand Hindu temples. This article explains the socio-economic and political importance of temples in Indian society, what they have contributed, and the current situation with regard to freedom of religion and various acts and laws passed by the different Indian states and whether or not they are constitutionally valid.

³ only ruler of the Travancore kingdom ruling house of the Kingdom of Travancore. The Travancore royal family ruled the princely state from 1663 to 1949.

⁴ Sanskrit word that means 'institute or college', and it also refers to a monastery in Hinduism.

Purpose of the Analysis

Studying unequal governance on Hindu temples compared to other religious places in India serves various purposes, but one prominent purpose could be to assess and address issues of fairness, equity, and religious freedom within the Indian context. Here are some key reasons why such a study might be pursued, studying unequal taxation on Hindu temples compared to other religious places in India serves to address a range of legal, social, economic, and cultural dimensions, ultimately contributing to the pursuit of a more just and inclusive society.

Significance

This analysis is important for understanding the disparities in tax policies between Hindu temples in India and other religious sites holds importance due to various factors, including social, economic and political aspects. It is crucial to examine these imbalances in taxation policies as it promotes transparency, fairness and religious equality within the diverse socio cultural fabric of our country. Such analysis aids in making decisions initiating policy reforms and advancing democratic principles, in governance.

³ establishments to promote religious activities, maintain temples, and support priests or religious leaders

Lets take the amount of tax and revenue generated by government from Hindu temple's from 2014-2018 :-

Source	Amount collected in test-checked temples in 2014-2018
Hundial collections	218.71 crore
Sale of prasadam, darshans etc.,	251.51 crore
Lease rent from properties	132.08 crore
Interest from investments	46.23 crore
Others	573.74 crore
Total	1,222.27 crore

While there aren't any reliable source of income or tax collected from any non-Hindu institutions like churches, mosques and gurudwaras as they don't have any state control or any institution to overlook them

Methodology

The research methodology adopted for this study aims to delve deep into the how the State government have control of Hindu temples through acts and legislations. . By using secondary data collection methods, the study sought to provide a comprehensive assessment of the judgements ,Litigations, Acts ,Articles ,Examples to present Critical Analysis on Uneven Governance of Hindu Establishments such as Temples.

In an Public Interest Litigation(PIL) Filed in Supreme Court of India

the lawyers were acting on behalf of the petitioner, a lawyer and ex-BJP spokesperson, who argued that "Hindu, Jain, Buddhist and Sikh people should be given the same right to set up, run and maintain their places of worship as Muslim, Parsi and Christian people and that the State cannot deprive them of that right, the PIL was heard by the bench of Chief Justice of India Uday Umesh Lalit ⁶and S Ravindra Bhat ⁷. While the PIL alleged that Hindus are being "isolated" as the state governments manage temples and their revenue, the top court questioned the need to review the 1863 REN Act, in law it has allowed temples to meet the "greater needs" of society.

According to the PIL, about 400,000 temples out of the total 900,000 are under the control of the government, while there is no single religious body in the form of a church or mosque where any form of control or interference by the government can be observed. Religious endowments are also included in the concurrent list. This allows the Centre as well as the states to make their own laws according to which the state can exercise some form of control over the management, supervision and levy of religious places.

⁶ 49th Chief Justice of India (27 August 2022 – 8 November 2022)

⁷ Judge of Supreme Court of India (23 September 2019 – 20 October 2023)

Hindu Religious and Charitable Endowments

Hindu religious and charitable endowments are governed by the powers vested in them by the Constitution of India. The Madras Hindu religious endowments law of 1925 was the first such law to be enacted in India after independence. In 1951, Madras Hindu religious and charitable endowments law was repealed and a similar law was enacted in Bihar around the same time. The Madras law also provided for the appointment of an Executive Officer to supervise temples and mutts. This law was challenged in courts and went through several changes (which are discussed in later sections) before being replaced by a new law in 1959. In 1960, the Union government appointed a Hindu religious and endowments committee to investigate certain matters related to Hindu public religious endowments.

States with Legislative Framework for HR&CE

Since 1925, the Madras Act has been in force in many states, and even in the last decade or so, a number of states have introduced some form of legislation for managing Hindu Religious Institutions (HR&CE). Some of the states that have implemented this type of legislation include Tamil Nadu, Karnataka and Andhra Pradesh. Other states that have enacted similar legislation include Maharashtra, Odisha and Himachal Pradesh. Other states have enacted similar laws for specific institutions, including Bihar and Rajasthan. However, this is not an absolute list of all the states that have adopted similar legislation, exceptions are there.

For example, the Vaishno Devi Mata shrine in Katra, Jammu is governed by the Jammu and Kashmir Shri Mata Vaishno Devi Shrine Board, since 1986.

Study of HR&CE Frameworks in Select States

The main source of executive involvement in temples comes from these laws and the powers assigned to them. In most of the cases mentioned above, this is done through the establishment of an HR&CE or similar department at the State level under the leadership of a Commissioner. The functions of the HR&CE department differ from one state to another, but at a minimum, they oversee the functioning and administration of temples, the appointment of trustees, the approval of budgets, etc. In certain cases, they are even allowed to appoint Executive Officers or government officials to directly supervise and direct temple administration. A detailed analysis of the enactments in three states has been carried out, with provisions on certain key parameters as mentioned in this section. The enactments in question are: Tamil Nadu Hindu religious and charitable endowments law, 1959 Andhra Pradesh charitable and Hindu religious institutions and endowments act, 1987 Karnataka Hindu religious institutions and charitable endowments law, 1997

Dr Subramanian Swamy Vs. The State of Tamil Nadu.

The plea has challenged the provisions of the Hindu Religious and Charitable Endowments Act 1959 granting the State Government absolute control over the appointment and dismissal of Archakas⁴ in the Hindu temples of Tamil Nadu.

The plea filed by Swamy assisted by Advocate Satya Sabharwal alleged that the government has taken over nearly 40,000 Hindu temples in the State of Tamil Nadu in utter disregard for the rights of the Hindus in the State to profess, practice, and propagate their religion.

The Example of Tamil Nadu

The Land of Temples is Tamil Nadu. Here are at least 400 temples that have Sanatana Dharma icons and symbols that date back more than a millennium. Tamil Nadu was a part of the "*Madras Presidency*" prior to independence, which included parts of modern-day northern Kerala, Lakshadweep, coastal Andhra, some Karnataka districts, and even southern Odisha. The first arbitrary regulation to regulate Hindu religious establishments was passed under this Presidency. The Madras Religious Endowments Act, 1926 (Act II of 1927) was the name given to it. This 1926 Act served as the model for all subsequent Religious Endowments Acts (intended solely for Hindu organizations) that were passed by the states within the "Republic of India." By 1935, the prior 1926 Act had undergone additional amendments, and the provincial governments in the Presidency, especially in the Tamil Nadu region, had assumed control of the administration of numerous sizable temples by "notifying" them in the Government Gazette.

Madras High Court Judgement : 1st Shirur Mutt Case

on 13.12.1951, a division bench of the Madras High Court, headed by Justice Satyanarayana Rao⁹ and Justice Rajagopalan Iyengar¹⁰, gave a landmark judgement in the 1st Shirur Mutt Case. The court ruled that the portions of the 1926 Act and the 1951 Act that permitted the takeover of temples by notices were invalid and unconstitutional. Consequently, the Madras Government should have withdrawn from the administration of approximately 50 significant temples. However, they didn't. The state government lodged an appeal against the ruling at the Supreme Court.

1954 Shirur Mutt Judgement

The 1954 Shirur Mutt judgement rendered the notification sections in the 1951 Madras Act unconstitutional and null. Despite the High Court order in 1951, the Madras Government failed to release 50 prominent temples and return them to the communities that were previously managing them. It is surprising that even after the 1954 Shirur Mutt judgement, this transfer of temples did not occur.

⁴ A Hindu Priest

Observations of Supreme Court:

The Supreme Court has repeatedly asked the government about the difference between its preference for certain communities and its aversion to others. In its judgment in the case of Jagannath Temple in Puri earlier this year, the bench of Chief Justice Dipak Misra ¹¹ and Justice S.A. Bobde¹² asked, “*Why should government officials be entrusted with the management of religious places or temples across the country?*” The judgment in the case Moseb Kaba Chowdhary & Anr. Vs state of West Bengal refers to Article 14. The SC held that Article 14 not only prohibits discrimination on the ground of religion but also on the ground of law.

⁹ Judge of Supreme Court of India (20th October 1964- 20th April 1966)

¹⁰ Judge of Supreme Court of India (27th July 1960- 14th December 1964)

¹¹ 45th Chief Justice of India (28th August 2017 – 2nd October 2018)

¹² 47th Chief Justice of India (18th November 2019 – 23rd April 2021)

The purpose of inserting the word '*secularism*'⁵ into the Preamble of the Constitution is to express the high ideals of secularism and 'the integrity of the nation' on the ground that the institutions are under stress and strain and vested interests are attempting to promote their selfish interests at the expense of the public interest. The Supreme Court once again held that India is a 'secular country' in its judgment in M.P. Gandhi v State of Kerala and Other Backwaters of the Indian Ocean. In the judgment, the SC held that: The Constitution prohibits the creation of a '*Theocratic State*'⁶. The Constitution is prohibited not only from establishing any '*religion of its own*' but also from '*identifying itself with or favouring any particular religion*'. Secularism under the Constitution does not mean '*the constitution of an atheistic society*'. Rather, it means '*equal status of all religions*' without any preference or discrimination between them.

Through comprehensive assessment of the Judgements, Litigation, Acts, Articles, Examples (secondary data sources) ensured a comprehensive analysis of Imbalance Influence on Hindu Temples in India Compared to other Religious places politicians concocted through antiseccular law to “*Provincialize the administration of Hindu Religious Institutions*”

Questions	Hindu	Muslim	Christian
Are places of worship controlled by state Governments?	Y	N	N
Can more places of worship be brought under government control?	Y	N	N
Does Government manage places of worship finance?	Y	N	N
Does Government manage places of worship administration, including religious rituals?	Y	N	N
Can Government dispose or sell place of worship assets?	Y	N	N
Is place of worship income taxed?	Y	N	N
Do practitioners have a say in the management of place of worship affairs	N	Y	Y
Can Government interfere in the management of education institutions run by religious bodies?	Y	N	N
Can educational institutions run by religious bodies discriminate in hiring of teachers, workers and in student admission while receiving government finds?	N	Y	Y

⁵ ideology that says religion should not be involved with the ordinary social and political activities of a country

⁶ a state that is governed by a government that derives its authority directly from a religion

Result and finding

Rights

Under Articles 25 and 26, the Indian Constitution, which became effective on January 26, 1950, guarantees citizens fundamental religious rights. The right to practice, propagate, and profess one's religion is guaranteed by Article 25. According to Article 26, *'every religious denomination'* has the right to establish and maintain religious institutions; to decide religious matters without external interference; to own and acquire property and to manage such properties legally. No matter a person's status as a *'majority'* or *'minority'*, these rights are guaranteed to them equally by the Constitution. Hindus have been denied these rights, as unbelievable as it may sound. Hindu religious institutions such as temples, mutts¹⁵, and endowments⁷ are governed, if not completely governed, by the State Government of India. Most of the State Governments of independent India have implemented specific codes or laws or Acts in which the Hindus and their community, sect, etc. do not have any say. The Constitution's framers, however, wisely included a separate power under Article 25(2)(b) that allows the state to pass laws *"providing for social welfare and reform or the throwing open of Hindu religious institutions"* to *"all classes and sections of Hindus"* in light of the temple entry movement. Thus, allowing access to worship is not the same as regulating secular components of religious practice. For this reason, admission to and control over temples are governed by different regulations. One does not rely on the other; they coexist.

Bill to free temples from government control introduced in Lok Sabha:

BJP MP Satyapal Singh's bill

Unfortunately, this practice of the British wanting to dominate Hindu temples as cash sources still exists today. The so-called "secular" nation does not think it is necessary to stop managing Hindu temples. The temples are viewed by the state government as a means of generating income and receiving very little in return. The call to remove government supervision from temples dates back nearly seven decades. But nothing much transpired over the years since,

¹⁵ Sanskrit word that means 'institute or college', and it also refers to a monastery in Hinduism

despite adhering to the constitution, the governments did not want to lose a significant source of funding.

The bill was introduced for the second time by Dr Satyapal Singh⁸ in Lok Sabha on 22nd November. He had first introduced the bill in 2017 which was kept pending. After tabling the bill, Dr Satyapal Singh addressing

⁷ establishments to promote religious activities, maintain temples, and support priests or religious leaders

⁸ Member of Parliament, Lok Sabha (26 May 2014 – 24 May 2019) representing BJP of Baghpat, Uttar

the media said that the rights of majority & minority communities must be equal and hence the bill. He further said that post-Independence care was taken by the constitution to allow the minorities to control their educational and religious institutions so that their fears are allayed. However, the Hindus were not extended the same treatment. It has become accepted over the past seven decades that minorities cannot have the same rights as the majority community. Rules and regulations are placed exclusively on Hindu institutions; Hindus are not capable of managing their own institutions. He stated, *"This is discrimination, which is why I've introduced my bill to make sure everyone is equal in the eyes of the law."*

It has become accepted over the past seven decades that minorities cannot have the same rights as the majority community. Rules and regulations are placed exclusively on Hindu institutions; Hindus are not capable of managing their own institutions. He stated, *"This is discrimination, which is why I've The bill's demands include prohibiting the state from controlling, managing, or administering any religious institution; prohibiting the drafting of laws that would allow the state to do so; allowing all communities to maintain their religious institutions; outlawing the theft of temple funds for secular purposes; amending Article 26 and other articles; and forbidding any state from usurping any religious institution. Introduce my bill to make sure everyone is equal in the eyes of the law."*

Details of the bill

Dr Satyapal Singh⁹ has introduced *'THE CONSTITUTION (AMENDMENT) BILL, 2019'* in the winter session of the parliament now. The bill calls for the amendments to Articles 15, 26, 27, 28, 29 and 30. The bill declares the following in its statement of objects and reasons:

"As per our Constitution, the State has no religion. The State has to treat all religions and religious people equally and with equal respect without, in any manner, interfering with their right to freedom of religion, faith and worship. As evident from the sub-text of the debates of the Constituent Assembly, the rights assured for the majority were only made explicit to the minorities as an assurance to the latter in the backdrop of the peculiar circumstances then prevailing in the aftermath of partition. In any case, it was never the intention of the makers of our Constitution to deny to the majority the rights expressly provided to the minority. Yet, it gradually led to interpretations that only the minorities were given rights withheld from the majority generating an unhealthy feeling of discrimination among the majority community. It goes without saying that nursing any real or perceived grievance against the State by any section of citizens, majority or minority, is detrimental to the unity and integrity of the country."

Pradesh

⁹ Member of Parliament, Lok Sabha (26 May 2014 – 24 May 2019) representing BJP of Baghpat, Uttar Pradesh

The sections then provides details of Article 26 and the observations of SC in this regard in various cases and then states:

“There has been widespread legitimate grievance and feeling of discrimination among Hindus that despite the Constitutional provisions and judicial decisions, Hindu temples and religious and charitable institutions are routinely taken over by the secular State on the pretext of maladministration, mismanagement, etc., whereas mosques and churches of the minorities are allowed to be exclusively managed by the respective communities even though article 26 confers right equally upon all sections of citizens. Hindus also genuinely feel that such State control results in despoiling the Hindu religious centres, large scale misappropriation of the temples’ income and properties and its redirection to secular purposes by the State, which is a major factor in the grinding poverty afflicting most Hindu temples, priests and their families. In order to maintain the secular character of the State and prevent it from usurping the religious and charitable institutions of any religious denomination or a section thereof, it is felt necessary to amend article 26 of the Constitution.”

In the annexure, the bill contains several extracts from the constitution itself which stresses on Prohibition of discrimination on grounds of religion, race, caste, sex or place of birth and Freedom to manage religious affairs.

Fraud & Mismanagement:

The Hindus residing in Tamil Nadu seem to be unaware of the potential consequences arising from the fraudulent activities carried out by the government. Presently, approximately 400 temples in Tamil Nadu are being managed by Government Executive Officers, despite the absence of any legally valid order appointing them under the provisions of the Tamil Nadu HR&CE Act, 1959. Notably, there are no traceable orders for temples such as Sri Ramanathaswamy Temple in Rameswaram, Sri Kapaliswarar Temple in Mylapore, Chennai, or Sri Thayumanaswamy Temple in Tiruchirapalli. These instances highlight the extensive scale of fraud committed by the Tamil Nadu government over a period of more than 70 years. Furthermore, this blatant disregard for the provisions outlined in Article 31-A(1)(b) of the Constitution, which states that only laws allowing for a limited period of management takeover of a property would be considered valid, is deeply concerning. More than 50,000 acres of valuable lands belonging to Hindu temples and endowments have reportedly disappeared under the administration of the government. These sacred spaces, once dedicated to Hindu worship, have now been deemed “secular” or even anti-Hindu. Instead of generating a fair income of Rs. 6000 crore per year, the management of Hindu temple properties by the government only yields Rs. 200 crore. In order to collect this amount, the government imposes an annual administration fee of approximately Rs. 270 crore and an audit fee of Rs. 90 crore. These fees are calculated as 12% of the temple's income for administration and 4% for audit purposes. It is important to note that the audit of the temples is not conducted externally, but rather internally by a department of the State Government that does not employ any Chartered Accountants. Shockingly, there are still around 1.8 million audit objections pending rectification since 1986.

A UNESCO report in 2017 cautioned that Tamil Nadu government, which manages around 30 thousand temples, neither has the capacity nor qualified experts to carry out conservation, leading to massacre of ancient temples

What are the criticisms against the state control?

- Secularism - Much of the campaign to free temples stems from the idea that control of temples by the state is against the principle of secularism.
- Interfering in the religious affairs - In the course of administering Hindu religious endowments, the state is trenching upon religious affairs.
- In Tamil Nadu, temples cannot even conduct pujas as the state has depleted their income.
- Plundering of temple resources - There is also accusation of large-scale loot and plunder of temple resources at the hands of state officials.
- The HR&CE Department collects hundreds of crores as common good fund, though the courts have frowned upon such forcible collection.
- Silencing the activists - States are alleged to be silencing temple activists by initiating arbitrary criminal action against them.
- Absence of records - Some state governments do not even have records of its own executive notifications justifying its management of certain temples.
- No external audit - In Tamil Nadu, no external audit is being conducted for temples under HR&CE, and there are 1.5 million audit objections pending resolution since 1986.

Recommendations

- Centre to form a Common Charter for Religious and Charitable Institutions and Uniform Code for Religious-Charitable Endowments.
- Control and management of the Temples can be given to Priests and Temple Trusts ,Trustees.
- State will be the custodian of assets and will manage through independent Boards of Temples, the management of the assets and all spiritual rituals will be the responsibility of respective Temple Boards.

Conclusion

Advocates of equality claim that the Mughals began the process of controlling temple wealth and the British followed suit after Independence. The Congress-led government of Jawaharlal went ahead with this policy by enacting the Hindu Temple Charitable Endowments (HRCE) Act in 1951. *"There is no control over mosques or churches, so we demand that temples should be free of any kind of control too. The government should*

amend the law, which is the source of the issue” said Supreme Court lawyer J.S. Sai Deepak. “Traditionally, even the Raja¹⁰ has no control over the temple's wealth.”

The Supreme Court, in at least three landmark judgments, has asked state governments to hand over religious institutions to the community. However, this has not happened till now. At present, there are two petitions pending before the Supreme Court in this regard.

There are more than 15 state governments that only have the power to appoint administrators and impose 13% to 18% service charge on all religious institutions, including temples. This deprives the community of the right and means to safeguard its interests. In their view, this is discriminatory because only the Hindu community is subjected to this kind of discrimination. It is also against the spirit of secularism and the Constitution of India does not allow the State to manage religious institutions.

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¹⁰ derived from Sanskrit, meaning "king", "ruler".

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