

THE MENACE OF OVER POLICING THE INDIGENOUS COMMUNITY

- A Human Rights perspective

-Anamika Singh¹

The cries of indigenous community of Manipur echoed loud all over India but will these protesting voices bring any positive impact in securing their human rights? The answer to this question depends on how well policing in these communities are carried out. From snatching away their ancestral lands to suffering police brutality, these communities have undergone continued suppression. The Armed Forces (Special Powers) Act, 1958 is a depiction of how oppressions on indigenous communities are carried out through legal means. This act has received heavy criticism from indigenous communities residing in north eastern states for its delegation of ruthless and excessive discretionary power to armed forces personnel. But as a matter of fact, the atrocities against indigenous communities are not merely limited to Manipur or north eastern states. While some cases garner public attention and sympathy, others remain unheard of. This paper is an endeavor towards securing human rights for these communities all over India and to attain this objective this paper shall follow four-phased research. In the first phase this paper provides a glimpse of the rights enjoyed by the indigenous communities in India and how over-policing adversely affects it. In the second phase, the paper provides a broader perspective by resorting to comparative analysis of policing mechanisms prevalent in other countries with respect to the indigenous communities. In the third phase the paper shall analyze how the National Human Rights Commission and related institutions have performed in attaining the aim of protection of rights of indigenous communities and lastly the paper shall explore how their rights can be protected against the whims and fancies of the police authorities.

Keywords: Indigenous Community, National Human Rights Commission, Over-Policing, Police atrocities.

¹ PhD Research Scholar at Hidayatullah National Law University, Raipur, Chhattisgarh, anamikahnlu@gmail.com, +91 – 8871624414

INTRODUCTION

Around 6.2% of the global population i.e. approximately 476 million people belong to Indigenous Community (Amnesty International) and around 8.2% of the entire Indian population are Scheduled Tribes. (Acharya, 2023) From being called *adivasis* and aboriginals to Scheduled Tribes, Constitution of India has brought a remarkable change in the cultural attributes as well as lifestyle of indigenous communities. (Virginus Xaxa, 1999) Specifically, Schedule V and VII of Indian Constitution which talks about “administration and control of Scheduled Areas and Scheduled Tribes” and “Administration of Tribal Areas in the States of Assam, Meghalaya, Tripura and Mizoram” respectively. Schedule VII of Indian Constitution has been drafted keeping in mind the demographic location of indigenous communities in India. However, there are many indigenous communities which neither belong to these areas nor have been notified by Constitution as Scheduled Tribe, thereby pushing them out of the protective spectrum of law. Before pondering upon their rights and its breach it is pertinent to understand who are tagged as Indigenous Community. There is no straightjacket definition for them, however, any individual who seeks to retain his cultural, linguistic or any of the ancestral attributes falls under this category. To protect these attributes; along with rights which are available to every citizen, some special rights have been conferred upon them. In addition to general fundamental rights like right to equality, right against self-incrimination, right to life, they enjoy some special rights like community rights, right over forest produce and biodiversity, right to use of their land etc.² Indigenous community centric laws like “The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Amendment Act, 2018, are also in existence in India, yet the desired results are not attained. (Yeole V. M., 2021). Despite the existence of these constitutional provisions, indigenous communities continue to be the targets of exploitation and persecution. This demonstrates that there is a significant gap between the concepts of the constitution and their actual implementation. (Vidyarthi L.P., 1972)

In an attempt to safeguard the rights of this marginalized section, the United Nations has made a declaration on Rights of Indigenous People. This declaration recognizes their Right of self-determination, Right of distinctive recognition while not being discriminated against, Right to protect their cultural and intellectual identity, right against forceful relocation, right to use and

² Forest Rights Act, 2006

conserve their resources and environment. (United Nations General Assembly, 2007) This paper however shall not discuss all of the rights enjoyed by Indigenous communities and would be limited to those rights which are being violated by over-policing. The implementation of the rights vests with the local authorities and police but because of the arbitrary regulation of these rights, equality and justice often appear as a distant dream far away from reality for them.

PLIGHT OF INDIGENOUS COMMUNITY IN INDIA

Despite recognition of the indigenous community as a vulnerable section, the community continues to face brutality of police in various segments of its life. Human Rights of these communities are infringed due to over-policing. This section of paper explores how over-policing has undermined the human rights of indigenous communities.

Forceful Evictions

The Forest Act grants the right to indigenous communities to use their land on their own accord and each state has its own land laws which usually has a separate special provision of aboriginals. Despite this fact, there has been a continuous illegal acquisition of their lands in the name of developing businesses and infrastructure. Some of these developments even lack the necessary “Free Prior and Informed Consent”. In addition, their rights are being violated as a result of the government's decision to divert forest lands for industrial use. Indigenous people are frequently subjected to forcible evictions, arrests, torture, and even killings. (Saravanan, Velayutham, 2011) To illustrate, around 45,000 Adivasis from 52 villages in the Ranipur Wildlife Sanctuary in Chitrakoot, Uttar Pradesh, feared eviction till 2022. (Alim, 2022)

There have been instances where the government has forcefully evicted many indigenous people from reserve forests on the pretext of the conservation of natural resources and not in all cases the government has provided them with rehabilitation. Over 520 indigenous Chakma and Garo individuals, who were forcibly displaced from the Lumding Reserve Forest in Hojai, Assam, in November 2021, did not receive any aid for a year. (Indigenous Rights Advocacy Centre, 2021). In addition to these government sanctioned plans the indigenous communities are often illegally evicted from their land by the local goons and police authorities.

Interference with their natural resources and biodiversity

The lifestyle of Indigenous communities majorly revolves around nature as they are heavily dependent upon the natural resources of their environment. Because of which they have been conferred with Right to preserve their resources and environment so as to maintain their livelihood. With an intent to regulate the forest resources, laws and policies pertaining to the conservation of forests and animals are being increasingly drafted by the Government. In July 2022, The Ministry of Environment, Forests, and Climate Change (MoEFCC) made modifications to the Environmental Impact Assessment (EIA) Rules of 2006 as per which exemptions have been granted for highway road projects in border areas, thermal-biomass power plants operating, airport terminal extensions, among other exemptions. (Ministry of Environment, Forest and Climate Change, Government of India, 2022)

This modification can become a threat to their livelihood as the exempted projects are neither required to undergo evaluation of its impact on indigenous people and their natural ecology, nor they are required to present their project for public-consultation. (Perinchery, 2022) In the pretext of protecting forests and wildlife, they are often refused access to the forest and its resources which forms the basis of their primary sustenance.

Illegal Arrest

After an array of amendments, indigenous communities even find themselves criminalized for activities which formed part of their livelihood. There have been instances of torture, illegal detention and even killings by forest authorities of adivasis who were collecting woods from forest (Indigenous Lawyers Association of India, 2022) or who were out on fishing expedition. (Singharia, 2022) To regulate the affairs of indigenous communities as per their whims, police officers even resort to their false implications in cases like smuggling. (Cuerden, 2022) Plethora of people belonging to indigenous communities have been victims of human rights violations, including extrajudicial executions committed by police officials.

Victimization of Tribal community

Not only does the presence of armed troops within Adivasi territory instill fear, but it also ensures that violations of human rights continue to occur at the same rate. As stated in the report titled

"Crime in India 2021", released by "the National Crime Records Bureau" (NCRB) documented 1,324 rape cases committed against Indigenous girls in a year.

Consent undermined

According to the Fifth Schedule of the Indian Constitution, any and all projects pertaining to development inside Adivasi regions are required to proceed only with the free, prior, and informed agreement of the Adivasi people. However, recently some new laws have been enacted which surpass this requirement. In accordance with the Forest Conservation Act (FCA) of 1980, the "Ministry of Environment, Forest, and Climate Change" (MoEFCC) replaced the "Forest Conservation Rules (FCR) 2003" and brought a new version of the same in 2022. As a result of the new legislation, the government now has the right to allow private developers to remove forests without seeking permission of the indigenous community. This clearly violates their right to "Free, Prior, and Informed Consent" (FPIC), as enshrined under the "Forest Rights Act of 2006" (FRA) and the "Panchayats Extension to Scheduled Areas Act of 1996" (PESA). (Harad, 2022) Like this, there are various instances where indigenous communities retaliated against unlawful acquisitions. To illustrate, protests erupted by representatives of indigenous community against the process of land acquisition carried out by the "Jharkhand Industrial Area Development Authority" (JIADA), when it came to light that these acquisitions were carried out without the agreement of the Gramme Sabhas, which are the village councils. (Bisoe, 2022)

POLICING OF THE INDIGENOUS COMMUNITY AROUND THE GLOBE

The problem of arbitrary exercise of powers among police authorities, to victimize the less empowered section of society, is prevalent all-around the globe in different forms. To counter the menace of police atrocity on marginalized sections, various countries have devised policing models targeting the indigenous community. This segment of research work focuses on creation of avenues for the sharing of knowledge about policing policy which can be made applicable to national framework. To achieve this objective various country's models have been explored to evaluate the merits and demerits experienced by them.

United States of America

From a welfare perspective, the American Constitution provides for three levels of governance: federally operated government, state government and tribal government. The federal government recognizes some tribal communities as federally recognized tribes and any transaction in relation to them is dealt with like a government-to-government agreement. These communities are very well developed and politically sound as they have their own organizations, laws, constitutions, tribal courts, police departments, jails, and civil laws to supervise their behavior and trade. However, in the 19th century the government with an aim to cater to economic development of the country shifted the coexistence approach to subjugation and then to assimilation. From reorganization to termination of the de facto federal authority in the 20th century, this relationship has undergone tremendous changes. Now the federally supported provisions for self-determination as well as self-governance has become the matter of negotiations.

Studies suggested that the indigenous community suffered atrocity by officers who were frequently drunk, and this led to a general condition of lawlessness, instability and disturbance on tribal property. One of the most suppressed communities were the migrated Indians and therefore in 1824, "Bureau of Indian Affairs" was established. But this body also could not safeguard their rights as despite the fact that the lower grade officers belonged to indigenous community, they were easily suppressed by their superior non-indigenous people. (Young, 1969) This organization was funded by the federal government and hence it suffered a great jurisdictional conflict. The study also found that tribal police agencies frequently prioritize the conventional paradigm of crime reduction which was based on retribution and hence did not bode well with the welfare model. This model of creation of a separate section for regulating indigenous communities failed as study witnessed high attrition rate of the police officers leading to recruitment of unqualified officers in the tribal police force. (Wakeling et al., 2001)

Canada

Of all the groups in Canada, statistics suggest that Aboriginal tribes have the greatest rates of reported and convicted offenses. Indigenous community records eight times higher crime rate than the national average and it comprises mostly of the offenses which are recognized as brutal or violent. (Brzozowski et al., 2006) Initially it was the federal government which regulated police affairs, in 1967 placing reliance on the recommendation put forth through research work (Canada

Indian and Northern Affairs Canada, 1990) the power was extensively delegated among state governments. The 1973 police task force report opined setting up a separate police force for aboriginals. Thereafter a special legislation was enacted by the Federal government, “First Nation Policing Policy” and a provision was also made for aboriginal officers. The changes however did not get an entirely progressive response and there was a mixed review about the performance of police, while some people applauded the new initiative others felt no change. The reason for stagnant status was that very few number of people belonging to aboriginal community held the position and even if they held it, they were subordinate to same corrupted officers.(Lithopoulos, 2022)

Australia

Australia encompasses two broad indigenous communities: the aboriginals and the Torres Strait Islanders. Using the doctrine of *Terra nullius* i.e. no one’s land, the Britishers occupied the land of these indigenous communities making them an outsider on their own land. The national survey on crime rate showed that in terms of public order offenses (such as driving under the influence of alcohol) and violent offenses, the percentage of indigenous people who were incarcerated was significantly higher than that of non-indigenous persons. (Natalie & Michael, 2005) Furthermore, they are also recorded as posing a larger threat of being victims of violent offenses, and socio-economic hardships, thereby increasing their victimization rate. (Cunneen, 2001, 79)

The policing system in Australia is centrally controlled. In 1987 when the Royal Commission into Aboriginal Deaths in Custody released its report on the victimization of aboriginals, it was a pivotal moment in the relationship between Indigenous-Australians and the justice administration system. This created a buzz about Indigenous self-policing, the employment of police officers belonging to indigenous groups in the various police services, and tweaking positively the attitudes of police officers towards Indigenous communities. The major lacunae of this policing system was that it lacked proper budget allocation, leadership, trust and had a high attrition rate making it not an ideal choice of model in totality.

New Zealand

Māori is the largest ethnic group of New Zealand which over the course of the past few years has witnessed a revitalization of their culture and ideas. Efforts have been undertaken by the Māori people themselves, which have been continuous and aggressive, to prevent the erosion of their traditional ways of life, also known as Māoritanga. The Māori continue to be inadequately represented in higher education and profession, then in 1996 The Māori Responsiveness Strategy was initiated by the police force in 1996 with the purpose of addressing this issue.

When compared to non-Māori individuals, they had a 3.3 times higher probability of being detained for a criminal offense in the year 1998. The likelihood of them being prosecuted was 3.6 times higher, the likelihood of them being convicted was 4.1 times higher, and the likelihood of them being sentenced to imprisonment was 1.5 times higher. According to the findings, despite the fact that Māori people constitute approximately 15% of the entire population, they constitute approximately half of the total prison population. (Doone, 2000)

A survey conducted in 1999 revealed that 48% of this community exhibited trust and confidence in the police force. Over the course of the period in which the New Zealand Police launched significant Māori responsiveness efforts, there has been an increase in the degree of trust and confidence among the Māori people. Factors influencing Māori attitudes towards the police include knowledge, past encounters, perception of their role in the criminal justice system, and response to crimes. The survey revealed that Māori respondents tend to have more positive interactions with older police officers (those 30 years or older). Due to their communication skills and stress management expertise, these policemen were reported to be less offensive than their younger counterparts. (Doone, 2000)

ANALYSIS

In India over policing has been a major issue which has led to various human right violations of indigenous community. To illustrate, Bastar being a very mineral rich part of the state of Chhattisgarh has often been in news for the naxalite activities. If one analyzes the government's strategy in this area, three broad steps can be identified. In the first place, the Government has established a policy environment that is favorable to the privatization of mining activities, which has paved the way for expanded corporate involvement in the particular industry. In the second place, a substantial amount of infrastructure has been built in order to facilitate the activities of the

corporation, which includes the extraction and transportation of minerals. The development of these infrastructure projects comprises the construction of roads, trains, airports, and other logistical support systems. And lastly, the entire region has been militarized by the installation of a large number of police camps. The purpose of these camps is to provide security for corporate interests and to crush dissent. This relentless incursion through privatization, corporatization, and militarization is seen by Adivasis as a direct threat to their very existence as well as their cultural legacy. (Shankar, 2024) Studies suggest that to counter this threat they often end up resorting to violence thereby paving the way for them being branded as Maoists or Naxalites.

The complaint against police authorities is not new and has often reached the National Human Rights Commission. To illustrate, in 2022 torture and subsequent killing of a 42 year old indigenous male was reported, who was arrested by the police on presumption of assisting Maoists. In this case NHRC has asked a report from the authorities as to what action was taken against this fake encounter. (National Human Rights Commission, 2022) However, it is pertinent to note here that NHRC in most cases either asks for a report, summons authority or pays compensation, because of such restrictive exercise of powers it has often been called a “toothless tiger”. The international Human Rights Institutions have also found themselves entangled in our national matters. They have intervened in some cases for safeguarding the rights of indigenous communities in many cases. Like, “The United Nations Committee on the Elimination of Racial Discrimination” (CERD Committee) requested Government of India to provide information about the measures that have been taken by them to prevent megaprojects from causing irrevocable harm to “Particularly Vulnerable Tribal Groups” (PVTGs). Furthermore, they requested information on the measures taken to enforce PVTG protection laws and regulations. (United Nations Human Rights, 2022)

With the rampant increase in protests by indigenous groups for protecting their rights, the need for sensitization of police and forest authorities was realized and steps were also taken in some cases to meet a middle ground to put an end to such protests. Like, to suppress the armed retaliation, the Government of India entered into an agreement with the state government of Assam and the armed *adivasi* groups to integrate the Adivasi groups into the mainstream and to grant them socio-political and economic rights. (Ministry of Home Affairs, 2022)

When tribe members approach the police with issues, they often themselves form organizations with priorities that have been fashioned by a model of policing that restricts their focus to a narrow band of criminal problems and police techniques. Furthermore, mostly their choice of dispute resolution is revolution or protest. To avoid such issues, we can devise a special police force by adopting some policing techniques of foreign countries. A further benefit of the Fifth Schedule of Indian Constitution is that it makes it easier to form independent district councils and regional councils inside Scheduled Areas. By establishing self-governance and supporting socioeconomic development among Adivasi groups, these institutions have been given the responsibility of nurturing these goals. (Mukul, 1997) Another challenge with self-regulation is tackling the corrupt practices of intermediaries. The self-regulating institutions would function adequately only when there is regular monitoring so as to curb corrupt practices. There is a huge allocation of funds from state and Central government every year, like recently in the Union Budget 2024, “Pradhan Mantri Janjatiya Unnat Gram Abhiyan” has been announced targeting socio economic development of tribal communities. (Nirmala Sitharaman, 2024). However the funds usually do not get deployed for the welfare activities and are embezzled by the ministers for themselves.

CONCLUSION

The over supervision makes the indigenous community feel detained, it makes them an offender for living their life in their own natural habitat. The question which one needs to ponder upon is, regulating the tribal affairs is at what cost? If it is at the cost of their cultural freedom and unique self-identification, are they willing to pay this price? If it is not a crime to express oneself differently, what is the need for this over policing? The right of self-identification is guaranteed to them by the law but how far are they free to exercise this law is unascertained. Certain initiatives have been taken by the Government of India in the form of laws and agreements to ensure their right of self-identification and to maintain their unique cultural attributes but often these laws are used as a tool for over-policing.

The over policing often adds to further human right violations. Different areas of the Indian territory have been labeled as Naxalite prone, Maoist prone and police camps have been established to curb the illegal activities. Some experts believe that *naxalism* or *maoism* is not a revolution but a retaliation. (Chinmayi Venkatesh, 2020) Tribal women continue to confront

significant challenges, including but not limited to sexual abuse, trafficking, being killed or labelled as a witch, being subjected to violence from the state or the military, and the consequences of development-induced relocation.

Although steps have also been taken by national and international human right agencies to safeguard the rights of indigenous community, their suppression continues. Even the Indigenous human rights defenders often face threats, assaults, and death in their quest of safeguarding these rights. The failure of these agencies in imposing stringent punishment ensures repetition of violation of human rights of indigenous community. It is an undeniable fact that the indigenous community has come to the realization that the police are insensitive and lacking in responsiveness to the requirements of the community and this leads to distrust among them for police authorities. To counter this issue certain recommendations have been made:

1. Setting up of a special task force at district and taluka levels that majorly comprises of indigenous people.
2. This special task force needs to be well equipped to deal with their disputes amicably.
3. If out of the court settlement fails the dispute should be dealt with by special fast track courts.
4. The task force should be placed under direct supervision of the Ministry of Tribal Affairs.

References

1. Acharya, S. (2023, August). RIGHTS OF THE INDIGENOUS IN INDIA: ISSUES & CHALLENGES. *International Journal of Creative Research Thoughts (IJCRT)*, 11(8). Retrieved May 16, 2024, from <https://ijcrt.org/papers/IJCRT2308331.pdf>
2. Alim, A. (2022, February 1). *UP Polls: 'Where Will We Go?' Ask Tribals in Chitrakoot on Being Served Eviction Notices*. NewsClick. Retrieved May 10,

- 2024, from <https://www.newsclick.in/UP-Polls-Where-Will-We-Go-Ask-Tribals-Chitrakoot-Being-Served-Eviction-Notices>
3. Amnesty International. (n.d.). *Indigenous Peoples*. Amnesty International. Retrieved May 17, 2024, from <https://www.amnesty.org/en/what-we-do/indigenous-peoples/>
 4. Bisoe, A. (2022, October 19). *Tribals say 'no' to land acquisition*. The Telegraph Online. Retrieved May 15, 2024, from <https://www.telegraphindia.com/jharkhand/tribals-say-no-to-land-acquisition/cid/1892868>
 5. Brzozowski, J.- A., Butts, A. T., & Johnson, S. (2006). Victimization and offending among the Aboriginal population in Canada. *Juristat*, 1209-6393, 26(3). Retrieved May 1, 2024, from <https://publications.gc.ca/site/eng/9.560753/publication.html>
 6. Canada Indian and Northern Affairs Canada. (1990). *Indian Policing Policy Review : Task Force Report*, Indian and Northern Affairs Canada, Ottawa (1990). <https://search.worldcat.org/title/Indian-policing-policy-review-:-task-force-report/oclc/1006489355>
 7. Cuerden, A. (2022, December 3). False case against tribal youth. *The Hindustan Times*. Retrieved May 12, 2024, from <https://timesofindia.indiatimes.com/city/kochi/false-case-against-tribal-youth-panel-seeks-action/articleshow/95953212.cms>
 8. Cunneen, C. (2001). *Conflict, politics and crime: Aboriginal communities and the police*. Allen & Unwin.

9. Doone, P. (2000). *New Zealand Family Violence Clearinghouse catalog › Details for: Report on combating and preventing Māori crime : Hei whakarurutanga mō te ao*. New Zealand Family Violence Clearinghouse. Retrieved May 5, 2024, from <https://library.nzfvc.org.nz/cgi-bin/koha/opac-detail.pl?biblionumber=3171>
10. Harad, T. (2022, July 11). *What Are Forest Conservation Rules 2022? Why Are They Being Criticised?* The Quint. Retrieved May 2, 2024, from <https://www.thequint.com/climate-change/what-are-forest-conservation-rules-2022-why-are-they-being-criticised#read-more>
11. Indigenous Lawyers Association of India. (2022, August 22). *Madhya Pradesh: Intervention made against killing of one tribal and injuries to three others*. Indigenous Lawyers Association of India. Retrieved May 17, 2024, from <http://www.indigenouslylawyers.org/interventions/madhya-pradesh-intervention-made-against-killing-of-one-tribal-and-injuries-to-three-others/>
12. Indigenous Rights Advocacy Centre. (2021, November 11). *Forced eviction of 145 Garo and Chakma tribal families by the forest department in Assam*. Indigenous Rights Advocacy Centre. Retrieved May 12, 2024, from <https://irac.in/forced-eviction-of-145-garo-and-chakma-tribal-families-by-the-forest-department-in-assam/>
13. Lithopoulos, S. (2022, August 3). *International Comparison of Indigenous Policing Models*. Public Safety Canada / Sécurité publique Canada. Retrieved May 2, 2024, from <https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/cmprsn-ndgns-plcng/index-en.aspx>

14. Ministry of Environment, Forest and Climate Change, Government of India. (2022, July). *EIA Notification, 2006 and subsequent amendments*. EIA Notification, 2006 and subsequent amendments. Retrieved May 5, 2024, from http://environmentclearance.nic.in/report/EIA_Notifications.aspx
15. Ministry of Home Affairs. (2022, September 15). *Union Minister of Home Affairs & Minister of Cooperation, Sh. Amit Shah presided over the signing of historic agreement between Government of India, Government of Assam and representatives of eight Adivasi Groups in New Delhi today*. Press Information Bureau. Retrieved May 12, 2024, from <https://pib.gov.in/PressReleasePage.aspx?PRID=1859665>
16. Mukul. (1997). Tribal Areas: Transition to Self-Governance. *Economic and Political Weekly*, 32(18), 928–929. Retrieved July 24, 2024, from <http://www.jstor.org/stable/4405361>
17. Natalie, T., & Michael, B. (2005, February 1). *2002 National police custody survey*. Australian Institute of Criminology. Retrieved May 4, 2024, from <https://www.aic.gov.au/publications/tbp/tbp13>
18. National Human Rights Commission. (2022, November 21). NHRC seeks report on Koraput 'fake' encounter. *The New Indian Express*. Retrieved May 2, 2024, from <https://www.newindianexpress.com/states/odisha/2022/Nov/21/nhrc-seeks-report-on-koraput-fake-encounter-2520451.html>
19. Nirmala Sitharaman. (2024, July 23). Budget 2024-2025 Speech of Nirmala Sitharaman. Government of India. Retrieved July 24, 2024, from https://www.indiabudget.gov.in/doc/budget_speech.pdf

20. Perinchery, A. (2022, July 26). *Now, Highway Projects Near Borders Don't Need Environmental Clearance*. The Wire. Retrieved May 5, 2024, from <https://thewire.in/government/now-highway-projects-near-borders-dont-need-environmental-clearance>
21. Saravanan, Velayutham. (2011). *Subalterns v. state institutions: politicians, state, forest, law and atrocities on tribals in tamil nadu, 1990-2000*. International Journal of Human Rights, 15(6), 948-968.
22. Shankar, K. (2024, May 1). *India's Adivasi Communities Are Facing Brutal Repression*. Jacobin. Retrieved May 10, 2024, from <https://jacobin.com/2024/05/india-ativasi-indigenous-repression-modi>
23. Singharia, K. (2022, August 26). *Tribal men burnt with hot bars for illegal fishing in Maharashtra's Amravati*. *The Hindustan Times*. Retrieved May 11, 2024, from <https://www.hindustantimes.com/cities/mumbai-news/tribal-men-burnt-with-hot-bars-for-illegal-fishing-in-maharashtra-s-amravati-101661525579914.html>
24. United Nations General Assembly. (2007, September). *United Nations Declaration on the Rights of Indigenous Peoples*. the United Nations. Retrieved May 12, 2024, from https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf
25. United Nations Human Rights. (2022, April). *106th session/2022*. UN Treaty Body Database. Retrieved May 16, 2024, from https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCERD%2FALE%2FInd%2F9556&Lang=en

26. Venkatesh, Chinmayi. (2020). Naxalism in india: the challenge of child soldiers and its remedy. *Australian Journal of Asian Law*, 20(2), 349-366.
27. Vidyarthi, L. P. (1972). Problems and Prospects of Tribal Development in India. *Indian Anthropologist*, 2(2), 80–93. Retrieved July 24, 2024, from <http://www.jstor.org/stable/41919217>
28. Virginius Xaxa. (1999). Tribes as Indigenous People of India. *Economic and Political Weekly*, 34(51), 3589–3595. Retrieved July 24, 2024, from <http://www.jstor.org/stable/4408738>
29. Wakeling, S., Jorgensen, M., Michaelson, S., & Begay, M. (2001, July). *Policing on American Indian Reservations*. Office of Justice Programs. Retrieved May 1, 2024, from <https://www.ojp.gov/pdffiles1/nij/188095.pdf>
30. Yeole, V. M. (2021). The scheduled castes and tribes (prevention of atrocities) act, 1989 with reference to discrimination faced by residents of north-eastern states in india. *Legal Lock Journal*, 1(1), 43-53.
31. Young, R. W. (1969). *Historical Backgrounds for Modern Indian Law & Order*. Bureau of Indian Affairs, Division of Law Enforcement Services. Retrieved May 1, 2024, from <https://www.ojp.gov/ncjrs/virtual-library/abstracts/historical-backgrounds-modern-indian-law-and-order>