
SECULARISM IN EDUCATION: A CRITICAL ANALYSIS OF ARTICLE 28 OF THE INDIAN CONSTITUTION

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ABSTRACT

Article 28¹ of the Indian Constitution prohibits religious instruction in State-funded educational institutions in order to uphold secularism and safeguard individual freedom of conscience. The changing socio-cultural dynamics and growing diversity within educational environments, however, call for a reconsideration of its existing purview. The shortcomings of Article 28 in response to the new challenges of today, including the National Education Policy (NEP) 2020's² emphasis on "Indian knowledge systems covert religious influences, the emergence of private-public partnership in education, and the importance of value-oriented education, are critically examined in this paper. Adopting an interdisciplinary methodology through constitutional law, education policy, and human rights analyses, this study contends for a widening or re-reading of Article 28 to enable inclusive, egalitarian, and secular learning environments. The study emphasizes the need for legal clarity, policy reforms, and institutional autonomy in achieving religious neutrality with cultural sensitivity in Indian educational institutions. including the Supreme Court's split verdict on the Karnataka hijab ban (2022), the Chhattisgarh High Court's ruling on Gayatri Mantra recitation (2026).

Article 28 of the Indian Constitution is instrumental in upholding the secular nature of the country's educational system through exclusion of religious teaching in schools fully funded by the State. Yet, with the changing socio-cultural dynamics and the growing pluralism in Indian society, there is a strong need to revisit and possibly enlarge the ambit of Article 28. This paper critically analyses the limitations of the existing provisions of Article 28 and makes a case for a balanced enlargement that addresses the issues of contemporary education, such as religious sensitivity, cultural inclusion, and moral education.

The study examines how the strict application of Article 28 can potentially stifle productive discussion on religious diversity and moral values, hence creating a gap in comprehensive student development. The study uses a qualitative approach to examine constitutional provisions, judicial

¹ INDIA CONST. art. 28.

² Ministry of Education, Government of India, *National Education Policy 2020* (2020).

precedents, and case studies across different Indian institutions of learning. Comparative observations across other secular democracies are also provided to frame the discussion.

The article seeks to introduce an amendment to Article 28 to enable value-based education on the lines of comparative religious studies, ethical thinking, and cultural competence without crossing the boundaries of secularism. The amendment would seek to introduce this with the intention not to enhance any faith but to develop mutual respect, tolerance, and national integration. It offers policy guidelines for curriculum framing and teacher education to keep the content in conformity with constitutional values.

Finally, the paper argues that broadening Article 28 to make space for structured, neutral, and inclusive deliberation over religion and ethics in institutions of education is not just required but essential in fostering socially conscious and responsible citizens who are culturally sensitive. The study advocates for a pragmatic approach to balancing protection of secularism and adopting the diversity that characterizes India's social and educational setting.

Keywords: Article 28 Indian Constitution, Secularism in Education, Religious Freedom in Schools, NEP 2020, Constitutional Safeguards in Education

Introduction

Secularism is important for the separation of religion from functioning of the state, including schools. In a democracy, secular schools are more prone to inclusion, fairness, and equal opportunity towards all students, irrespective of their beliefs. Article 28³ of the country's constitution serves to ensure this principle by prohibiting religious education in a publicly funded school. Yet changing social and political conditions complicate this, and the task of extending Article 28 so that it supports further secularism in their interpretive application to schools will require a broadening of the article's interpretation. This introduction will consider reasons for extending Article 28, implications of secularism in schooling, and the possible advantages of broadening the policy to ensure that education is uniformly neutral. Ultimately, we would like to develop an educational experience void of religious influence, and an education that will promote knowledge and engagement, rather than faith. Secularism constitutes a crucial tenet that fails to mingle religion with state affairs, notably education. It is

³ INDIA CONST. art. 28.

therefore important that arrangement of schools in a democratic society follows strict secular educational principles to ensure that everyone is included, treated fairly, and have equality of opportunity as student regardless of their religious beliefs. Article 28 of a nation's constitution is integral to limiting religious instruction in schools that are publicly funded. However, the socio-political and educational landscape of India had significant transformation since the Constitution's framing in 1950. The emergence of the National Education Policy (NEP) 2020⁴, which emphasises "rootedness in Indian ethos" and the connection of "Indian knowledge systems," has raised critical questions about the boundary between cultural education and religious instruction.

Understanding Article 28 and Its Current Implications: -

- Article 28 delineates the function of religious education in the education system, specifically in schools that operate with public funds. It guarantees that no child shall be required to receive religious education if they do not want to participate, nor shall a school which is funded by the public endorse any one religion. Article 28 is aimed at advancing religious freedom while protecting schools and colleges from undue religious influence, from any religious group, in publicly funded schools.
- While these provisions are classified as noble, there are present with some inherent challenges which in today's world that lend themselves to a need to extend Article 28. Many Schools still find themselves under debating or being challenged with these issues with respect to religious symbols, prayers, with these issues being an integral part of a long-standing fascination with the ideals of secularism in education, and as a way to deal with this complexity of increasingly diverse and pluralistic societies.

The Objective for Extending Article 28: -

1. Escalating Religious Diversity: Societies are becoming ever more multicultural and multi-religious. In conjunction with these diversities comes the need to adhere to different religious perspectives while remaining neutral. The amendment of Article 28 can provide firmer guidance on how religious practices are accommodated in schools, so no group feels disadvantaged or advantaged.

⁴ Ministry of Education, Government of India, *National Education Policy 2020* (2020).

2. Prevention of Religious Discrimination and Suspicious Discrimination, favouritism, or even segregation often occurs in the presence of religious practices within publicly funded institutions. Strengthening Article 28 allows us to strengthen policies ensuring no students are treated differently due to their religious practices.
3. Controversies over Religious Symbols and Dress: The question of whether or not to permit students to wear religious symbols and dress is a dispute around which ire exists in many nations. Some advocate for banning symbols because they believe students should be free to make autonomous choices about whether to carry religious symbols. Others assert that students should not wear religious symbols because it violates the principles of secularism. Expanding Article 28 could be a solution to addressing tensions surrounding this issue so that the educational environment is inclusive and culturally neutral.
4. Governance of Religious Influence in Curriculum: Education should be anchored by factual knowledge, scientific inquiry, and critical inquiry as opposed to religious beliefs. However, in some contexts, religion-related ideologies segway into the educational content of religious beliefs, impacting objectivity in subject areas such as history and science. Clarification and strengthening of Article 28 would further support evidence-based and secular curriculum.

Background

Article 28 of the Indian Constitution addresses the freedom regarding attendance at religious instruction or religious worship in some educational institutions. It aims to impart a secular nature in state-funded and state-run educational institutions. The Article is broken down into three clauses, differentiating among institutions maintained entirely by the State, those run by the State but founded under endowments or trusts, and privately run institutions.

But of late, the sociopolitical and educational context has changed, presenting challenges that were not so much foreseen at the time of the Constitution's framing. There is growing alarm regarding insidious methods of religious indoctrination, ideological predispositions, and cultural impositions within institutions of learning. Such have set off controversies regarding whether the initial purview of Article 28 is adequate to safeguard the secular and inclusive character of education.

One of the fundamental issues is the vagueness regarding what constitutes "religious instruction", especially in schools that are partially state-aided or controlled by religious trusts. As religious and cultural claims increase, the distinction between cultural education and religious indoctrination tends to be obscure. This calls for a wider and more explicit interpretation of Article 28 so that it is in line with the constitutional mandate

Research Questions

Research Question 1: How effectively is Article 28 implemented in current Indian educational institutions, and are there any challenges?

Though Article 28 offers a strong constitutional protection, its application is differential in the nation because of administrative grey areas, socio-political pressures, and differential interpretations. In government schools and colleges, explicit religious teaching is not typically part of the curriculum. But implicit issues remain: Certain schools conduct morning prayers or celebrate religious festivals prominently, at times giving preference to the majority religion. In some states, government subsidies are given to schools operated by religious groups, and there are questions about the application of public money for possibly religious ends.

Uniform codes or rules in schools have generated controversies about religious freedom vs. institutional discipline (e.g., the hijab ban controversy in Karnataka).

Additionally, while the Right to Education Act⁵ focuses on universal education, it doesn't necessarily tackle the complexities of religious neutrality. Religious schools under minority groups tend to include religious education, although they are permissible under Article 28(2) and (4). That said, there's a lack of clarity when these institutions are partially or indirectly funded by the state. Another problem is that students and parents are not well aware of their rights under Article 28. This results in minimal resistance to religious coercion or rituals carried out within schools.

For ensuring complete compliance, the following are required:

- Clear instructions and regular checks to provide for secular practices.

⁵ The Right of Children to Free and Compulsory Education Act, No. 35 of 2009, India Code (2009).

- Sensitization courses for school personnel on constitutional provisions.
- Legal remedies or complaint redressal mechanism for students suffering from religious discrimination.

Research Question 2: How can the extension of Article 28 address challenges have related to religious symbols, attire, and practices in educational institutions?

Over the past few years, India has seen a rise in number of legal and social disputes arising regarding religious symbols and dress in many schools—most recently, the hijab dispute in Karnataka and tilak, turban, or disputes. These disputes which have raised speedy questions regarding the secular character of educational and individual rights. Article 28, as it stands, does not expressly regulate religious expression through dress or symbols. A conceivable application of Article 28, though, could:

Establish the limit between individual religious practice and institutional neutrality: While students are entitled to wear religious garments as part of their individual freedom under Article 25⁶, the institution has an obligation under secular administration to preserve uniformity, discipline, and neutrality. A furtherance of Article 28 can serve a legal basis for reconciling these rights. Create religious neutrality guidelines: School districts—particularly those that receive public funding—must be required to adhere to rigorous religious neutrality both in teaching and in appearance. This means prohibiting obvious religious symbols among teachers within state-funded schools to prevent indirect religious input among students. Encourage inclusive cultural practice: Instead of prohibiting all religious expression, an expanded Article 28 can encourage interfaith education and cultural respect, enabling educational institutions to commemorate diversity without leading to a preference for one religion over the other. Therefore, expanding Article 28 to include symbolic and cultural elements of religion can make the educational environment more just and secular, and less communalized in terms of conflict and polar.

Research Question 3: What are the limitations of Article 28 in ensuring secularism in educational institutions, and how can it be extended to address modern-day challenges?

Article 28 of the Indian Constitution is included under the Fundamental Rights within the

⁶ INDIA CONST. art. 25.

heading of the Right to Freedom of Religion. The article makes provisions for the disallowance of religious instruction in educational institutions fully maintained out of State funds.

- Clause (1): No religious instruction shall be given in any educational institution maintained wholly out of State funds.
- Clause (2): Clause (1) shall not extend to institutions which are under the administration of the State but were established under an endowment or trust involving religious instruction.
- Clause (3): It is not obligatory to attend religious instruction or worship in any State-recognized institution or institution receiving State aid.

These clauses seek to uphold secularism by inhibiting state-funded or state-mandated religious education. Various limitations however hamper its applicability in the current context.

Limitations of Article 28

- Limited Definition of Religious Practice: Article 28⁷ merely safeguards "religious instruction" and "worship" but not symbolic religious expression like wearing hijabs, turbans, tilaks, or crosses, nor does it ban the insidious promotion of religious ideology in schools.
- Exclusion of Private Institutions: The provision only extends to state-aided or recognized schools. It excludes a huge section of the population that studies in private unaided schools—most of which are religious in nature—even when such schools influence public values.
- Loophole in Clause (2): Clause (2) permits religious instruction in the event that a state-controlled institution was created on the basis of a religious endowment. This goes against the very essence of secularism by permitting publicly governed institutions to transmit religious education.
- Absence of Enforcement Mechanisms: There is no well-defined legal remedy or

⁷ INDIA CONST. art. 28.

regulatory authority for ensuring adherence to Article 28. Transgressions frequently pass undetected or are labelled as cultural phenomena instead of as constitutional violations.

How Can Article 28 Be Extended?

To make Article 28 relevant and robust in today's pluralistic and politically sensitive context, a multi-pronged extension is needed:

1. Broaden the Definition of Religious Influence

Article 28 should be redefined to include:

- Religious symbols and attire within public institutions, especially where a uniform code exists.
- Indirect religious instruction embedded in curriculum, teacher behaviour, or school rituals.
- Promotion or celebration of specific religious festivals as part of institutional culture.

The extended definition has to make a distinction between individual religious freedom (covered by Article 25) and institutional religious neutrality (required by Article 28).

2. Extend Provisions to All Institutions Receiving Public Benefits

- Although private institutions may be unaided, several receive indirect benefits like tax exemption, land grants, or government partnership. The extended Article 28 has to extend to any institution receiving public benefit, not only those funded entirely by the state.

3. Invalidate Clause (2) Exception

- Clause (2) erodes Article 28's fundamental purpose. Its elimination would guarantee that no institution of state origin is permitted to offer religious education. Secularism requires state control to mean religious neutrality.

4. Create Legal Supervisory Institutions

- Create a National Commission for Secular Education to:
- Oversee compliance with secular standards.
- Accept and investigate allegations of religious coercion or bias.
- Advise on curriculum changes to eliminate religious overtones.
- This would provide teeth to Article 28, converting it from a passive protection to an active instrument of secular rule.

5. Establish a Secular Code for Schools

The state, through education departments, can enact a Uniform Secular Code in schools, prescribing:

- Standards of dress code.
- Prohibition of mass religious rituals.
- Training modules on constitutional secularism for teachers.
- This would in still secular values into the day-to-day operational ethos of education.⁸

Research Question 4: How can the extension of Article 28 balance institutional secularism with individual religious freedoms under Article 25 in a democratic society like India?

The Constitution of India which guarantees the freedom of practicing any religion under Article 25, that allows individuals to freely profess, practice, and propagate religion, subject to public order, morality, and health. However, Article 28 restricts religious pressure or activities instruction in state-funded institutions to maintain the institutional secularism. This whole process generates a constitutional tension between groups: while citizens are entitled to express their religious identity, schools—particularly those that are funded or assisted by the state—

⁸ Article 28 Of Indian Constitution Clauses 1,2,3
https://www.education.gov.in/fundamental_rights_article-28

should not promote or support any religious belief. Expanding Article 28, therefore, there must be a walk of fine line between these two principles.

Case Study: Hijab Ban in Karnataka (2022)⁹

The Hijab ban controversy which re-ignited religious expression in schools in the whole country as a topic of heated debate. The Karnataka High Court supported the ban on the premise that uniform dress codes foster equality and discipline, but the opponents said the ban infringed on individual religious freedoms. The case serves to underscore the importance of establishing clearly the demarcation between institutional religious neutrality and personal religious expression.

Balancing the Rights: A Framework

In order to facilitate the extension of Article 28 without encroaching on Article 25, the following must inform policy and legislation:

1. Institutional Neutrality, Personal Freedom

- Students must continue to have the right to dress in religious apparel unless it crosses reasonable institutional boundaries.
- Teachers and principals, as government agents, need to desist from wearing personal religious symbols on working days.
- This model resembles the "principled distance" model—India's own brand of secularism, which does not mandate complete separation between religion and state but governs engagement to make it equitable.

2. Regulations Specific to Context

Instead of one-size-fits-all bans, policies must be designed based on education level, localized context, and institutional goals. For example:

- Primary schools could require more stringent neutrality standards to guard formative

⁹ *Aishat Shifa v. State of Karnataka*, 2022 SCC Online 323.

minds.

- Institutions of higher education can provide increased flexibility without religious favouritism.
- This tiered approach upholds autonomy while reaffirming constitutional values.

3. Judicial Safeguards

Judiciaries must be authorized to:

- Conduct constitutional scrutiny of institutional policies.
- Develop clear precedents regarding what constitutes reasonable limitation on religious expression.
- Enforce secularism as a fundamental aspect of the Constitution, ensuring any challenge to Article 28's extension is respectful of democratic principles.

4. Promoting Inclusive Secularism through Curriculum

True secularism is not the absence of religion but respect for all equally. Curriculum reforms must:

- Integrate comparative religious studies as academic courses.
- Encourage interfaith understanding without encouraging belief systems.
- Develop ethical and humanistic values based on constitutional morality.
- This allows students to intellectually understand religions, not dogmatically, reinforcing secular ideals.

Research Methodology

1. Research Design

The research work takes a qualitative doctrinal study with aspects of comparative legal review

and normative investigation. Its objective is to critically analyse the reach, constraint, and potential expansions of Article 28 of the Indian Constitution with respect to secularism within schools. The study uses constitutional documents, jurisprudence precedents, school education policies, and international practices of secularism to frame pragmatic suggestions.

2. Objectives of the Study

- To examine the legal reach and implications of Article 28 as it stands.
- To ascertain the shortcomings of Article 28 in providing secular education in modern India.
- To discuss the reconciliation between institutional secularism and personal religious rights.
- To suggest reforms and amendments to Article 28 in consonance with constitutional ideals and democratic values.

3. Sources of Data

a) Primary Sources

- The Constitution of India, particularly Articles 25 to 30.
- Landmark judgments of the Supreme Court and High Courts (e.g., *Aruna Roy v. Union of India*¹⁰, *Bijoe Emmanuel v. State of Kerala*¹¹, *Karnataka Hijab case*¹²).
- Government reports and policy documents, including the National Education Policy "NEP" 2020.
- Parliamentary discussion on secularism and education.

b) Secondary Sources

- Constitutional law and secularism legal commentaries and scholarly articles.

¹⁰ *Aruna Roy v. Union of India*, (2002) 7 SCC 368.

¹¹ *Bijoe Emmanuel v. State of Kerala*, (1986) 3 SCC 615.

¹² *Aishat Shifa v. State of Karnataka*, 2022 SCC Online 323.

- Books from eminent constitutionalists (e.g., M.P. Jain¹³, H.M. Seervai¹⁴).
- Law journals, education tanks, and public policy institutions research papers.
- Case studies on international perspectives (France, U.S., Turkey) of secularism in schools.

4. Method of Data Collection

- Document analysis was employed in interpreting constitutional provisions, judicial pronouncements, and statutory schemes.
- Case study approach was used to examine recent controversies like the hijab ban, religious prayers in school, and private religious schools' practices.
- Comparative analysis was used to contrast India's legal framework with other secular democracies.

5. Analytical Framework

The study employs legal hermeneutics and constitutional interpretation to critically examine how Article 28 is interpreted in practice. It utilizes a rights-balancing approach to analyse the balance between institutional neutrality and individual freedom. Normative analysis is utilized to propose practical changes to law and policy.

6. Scope and Delimitation

- The research is confined to educational institutions within India, with emphasis on schools and colleges that are funded by the state.
- It does not include religious education in private religious schools unless they are state-aided.
- Although international models are considered, the emphasis lies in fitting solutions

¹³ M.P. Jain, *Indian Constitutional Law* (8th ed., LexisNexis, 2018).

¹⁴ H.M. Seervai, *Constitutional Law of India* (4th ed., Universal Law Publishing).

within the Indian constitutional framework

LEGAL ANALYSIS & DISCUSSION

1. Constitutional Framework: Article 28

- Article 28 of the Indian Constitution is one of the most important provisions to ensure that state-funded educational institutions are secular spaces. It states:
- Article 28(1): No religious instruction shall be given in any educational institution entirely maintained out of State funds.
- Article 28(2): This prohibition shall not apply to institutions managed by the State but founded under a trust which necessitates religious instruction.
- Article 28(3): Attendance at religious instruction or worship is voluntary in institutions that receive State aid or recognition.

The purpose of Article 28 is to dissociate religious influence from public education, a fundamental principle of India's secular nature under the Preamble and the basic structure doctrine.

2. Judicial Interpretation of Article 28

Indian courts have over time interpreted Article 28 in different degrees of emphasis on individual freedom (Article 25) and institutional secularism (Article 28). Some of the key cases are:

a) "Bijoe Emmanuel v. State of Kerala" (1986)¹⁵

The Supreme Court held with the favour of three Jehovah's Witness students who just refused to sing the national anthem while on religious grounds, which established Article 25's supremacy over individual conscience. While not explicitly using Article 28, this case established a remark for religious tolerance in schools.

¹⁵ *Bijoe Emmanuel v. State of Kerala*, (1986) 3 SCC 615.

b) "Aruna Roy v. Union of India" (2002)¹⁶

This case questioned the National Curriculum Framework in the context of upholding Hindu values. The Court violated the curriculum, separating religious instruction (which is prohibited) from moral or cultural instruction (which is allowed). The decision reiterated that educational material may refer to religions objectively, yet not advocate any belief

c) Karnataka Hijab Ban Case (2022)¹⁷

A controversial case in which the Karnataka High Court confirmed a school's decision to impose uniformity and ban hijabs in the classroom. The ruling engendered national controversy regarding religious expression vs. institutional order. While not directly grounded in Article 28, the case reminded the public of the boundaries of religious practice within schools. These judgments together demonstrate that Article 28 has a very limited scope—it primarily prohibits formal teaching but also allows for symbolic religious presence, which can continue to influence the secular ethos of educational institutions.

3. Shortcomings in Article 28's Current Application

In spite of its constitutional significance, Article 28 has minimal application and extent in practice:

- Does not pertain to unaided private institutions, numerous which are religion-related and attain indirect state subsidization (i.e., tax exemption).
- Allows for religious education within state-owned institutions formed under trusts, posing an exception at variance with the secular purpose.
- Does not encompass indirect influences of religion, such as prejudice in teachers, religious holidays or rituals (e.g., dress of crosses, tilaks, hijabs).
- Lacks enforcement—there are no statutory provisions or specialized bodies to oversee compliance with Article 28.

¹⁶ *Aruna Roy v. Union of India*, (2002) 7 SCC 368.

¹⁷ *Aishat Shifa v. State of Karnataka*, 2022 SCC Online 323.

4. Scope for Extension: Legal Possibilities

a) Repealing the Trust Exception (Clause 2)

Clause (2) of Article 28, which permits religious instruction in state-run institutions under religious trusts, should be repealed or limited. This clause provides a constitutional loophole that dilutes the secular neutrality of the state.

b) Broader Interpretation of "Religious Instruction"

- Courts and legislatures may interpret "religious instruction" to mean:
- Rituals or worship imposed in assembly or curriculum.
- Promotion of religious symbols by the institution.
- Bias guides for teaching in Favor of one religion.
- Wider interpretation is in conformity with the underlying spirit of secularism incorporated in the Preamble and Article 14 (equality before law).

c) Application to Privately Aided and Indirectly Benefited Institutions

- A longer Article 28 should not only be made applicable to government-funded educational institutions but also to:
- Private aided institutions.
- Institutions recognized and receiving any form of benefit (e.g., land grants, subsidization of utilities).
- Institutions registered under public charitable trust legislation.

This direction takes cue from judicial thinking in *Unni Krishnan v. State of Andhra Pradesh*¹⁸, where even private institutions were required to adhere to fundamental rights while playing

¹⁸ *Unni Krishnan, J.P. v. State of Andhra Pradesh* 1993 AIR 217

public functions.

d) Introduction of a Regulatory Framework

- India requires a statutory authority or regulatory body to enforce Article 28 in letter and spirit. A national commission on secular education could:
- Track institutions for their religious neutrality.
- Deal with religious discrimination or coercion complaints.
- Advises the development of the curriculum for its ideological neutrality.

Summary of the Findings

1. Ambiguity in Judicial Interpretation

Judicial decisions have sought to reconcile institutional neutrality with personal freedom of religion, but results have been mixed.

Decisions like *Bijoe Emmanuel* prioritized personal conscience, whereas *Aruna Roy* and the *Karnataka Hijab Case* demonstrate the challenge of implementing secularism in pluralistic educational settings.

2. Inadequate Enforcement Mechanisms

There is no oversight or institutional mechanism to enforce compliance with Article 28. Schools tend to carry on religious traditions informally—morning prayers, celebrations, religious symbol beyond explicit constitutional oversight or accountability.

3. Danger of Religious Polarization in Education

Without a strong framework under Article 28, religious and ideological prejudice may seep into the curriculum, pedagogy, and school culture, compromising the universal character of education. Increasing politicization of religious identity in India makes it all the more imperative to safeguard school spaces against sectarian influence.

4. Comparative Lessons Inform Reform

Comparative examples like France's hardline secularism, the U.S.'s safeguard of private expression through institutional neutrality, and Turkey's hybrid model provide insights. All these models confirm that secularism in schools has to adapt with democratic ideals and pluralistic realities.

5. Extension and Reform of Article 28¹⁹ are Needed

There exists a robust constitutional foundation—and an imperative need—for the reinterpreting or expansion of Article 28 to guarantee that all government-funded and state-recognized institutions practice absolute religious neutrality.

- An expanded interpretation should encompass:
- Ban on coercive or institutionalized religion.
- Uniform guidelines for private aided institutions receiving public funding or recognition.
- More stress on secular and civic education as opposed to religious indoctrination.

6. Policy and Structural Recommendations

- The recommendations necessitate the creation of a regulatory body or mechanism to oversee and enforce secular standards in schools and colleges.
- Teacher training, curriculum checks, and student grievance redressal are essential to maintain constitutional secularism.
- Legal reforms, either judicially or through constitutional amendment, need to work towards bridging the gaps presently being exploited under the guise of religious autonomy.

¹⁹ INDIA CONST. art. 28.

Future Scope of Research

The research horizon for the future of Article 28²⁰ extension is wide and varied. As India continues to grapple with its constitutional promise of secularism in the face of increasing diversity and political sophistication, scholarly inquiry must widen to provide evidence-based, legally valid, and socially inclusive solutions. Future studies must continue to close the gap between constitutional aspirations and institutional practice, so that educational spaces remain genuinely neutral, inclusive, and representative of the values inscribed in the Preamble.

²⁰ INDIA CONST. art. 28.