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BREAKING CHAINS, BUILDING JUSTICE: DR. B.R. AMBEDKAR'S CONSTITUTIONAL LEGACY AND ITS CONTINUING JUDICIAL LIFE

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ABSTRACT

Dr. B.R. Ambedkar's constitutional thought cannot be understood apart from the caste discrimination he experienced directly and the intellectual apparatus he built, across three decades of advocacy before the Constituent Assembly convened, to dismantle it. This paper examines Ambedkar's contribution to Indian constitutional law not merely as biography but as a body of doctrine that continues to shape contemporary adjudication. It traces his advocacy from the 1919 Southborough Committee through the Round Table Conferences and the Poona Pact to his chairmanship of the Drafting Committee, and it demonstrates that the constitutional architecture he shaped, Articles 14 through 18, the Directive Principles, and the special provisions of Part XVI, remains the operative doctrinal foundation for equality jurisprudence in India today. The paper gives particular attention to two concepts of lasting judicial significance: constitutional morality, which the Supreme Court has invoked in landmark decisions including Government of NCT of Delhi v. Union of India and Navtej Singh Johar v. Union of India, and the abolition of untouchability under Article 17, enforced through the Protection of Civil Rights Act, 1955 and interpreted expansively in State of Karnataka v. Appa Balu Ingale. It concludes that Ambedkar's central insight, that political democracy is unsustainable without social democracy, continues to supply the interpretive key through which Indian courts read the equality provisions he helped draft.

KEYWORDS: *B.R. Ambedkar; Constitutional Morality; Caste Discrimination; Article 17; Reservation Jurisprudence*

1. INTRODUCTION

"The outcaste is a bye-product of the caste system. There will be outcastes as long as there are castes. Nothing can emancipate the outcaste except the destruction of the caste system," Dr. B.R. Ambedkar wrote, capturing in a single sentence the analytical premise that would guide his constitutional thought for the remainder of his life.[1] The walls and barriers built by caste structure within the Hindu social order produced a form of social injustice that fell with particular severity on communities treated as untouchable, and Ambedkar's own experience of this injustice shaped his conviction that the principal obstacles to a just society, the caste system, patriarchal structure and labour exploitation, could be addressed only through structural social reform rather than incremental accommodation.[2] Throughout his public life he advocated not for the reform of caste but for its removal from Indian society

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1 B.R. Ambedkar, Annihilation of Caste: An Undelivered Speech (Arnold Publishers 1990).

2 Dr. Priya O., Ambedkar, the Constitution Maker: His Quest for Justice, 10(4) Int'l J. Multidisciplinary Educ. Rsch. (2021).

altogether, a conviction expressed most consequentially in his role as Chairman of the Constituent Assembly's Drafting Committee.

Ambedkar's influence on Indian constitutionalism began well before the Constituent Assembly convened. His participation in the 1919 Southborough Committee on Franchise and his subsequent presence at the 1930 Round Table Conference in London, where he opposed Gandhi and argued for compensatory discrimination in favour of the untouchables, established the intellectual foundations on which the Constitution's equality provisions would later rest.[3] Ambedkar believed that the strengthening of constitutional principles, what he termed constitutional morality, borrowing the phrase from the historian George Grote, was the mechanism through which politics could reform society, a belief this paper argues retains direct doctrinal relevance to contemporary Indian constitutional adjudication. Following the Constitution's adoption on 26 January 1950, Ambedkar served as Minister of Law and Justice in Jawaharlal Nehru's cabinet, and the final years of his public life were devoted substantially to advancing, through legislation and public advocacy, the constitutional vision he had helped draft.

This paper's approach departs deliberately from the predominantly biographical treatment Ambedkar's constitutional role has often received in general commentary. Rather than treating his life and thought primarily as historical narrative, it examines Ambedkar's contribution as an active body of constitutional doctrine, tracing specific concepts he introduced or shaped to their contemporary judicial application. This doctrinal orientation matters because it is easy, in retrospective accounts of a constitutional founder, to treat the founder's contribution as complete at the moment of drafting, a snapshot fixed in 1950. The analysis that follows instead treats Ambedkar's constitutional text as a living resource that Indian courts continue to interpret, extend and apply to circumstances he did not, and in some cases could not, have anticipated, and it is this continuing judicial life, rather than historical reconstruction alone, that supplies the paper's central analytical contribution. The paper examines that vision doctrinally, tracing Ambedkar's constitutional advocacy, analysing the equality architecture of Articles 14 through 18 and the Directive Principles he shaped, and demonstrating through subsequent case law that his central conceptual contributions, constitutional morality and the constitutional abolition of untouchability, continue to structure Indian equality jurisprudence today.

[3] Bidyut Chakrabarty, B.R. Ambedkar and the History of Constitutionalizing India, 24(2) Contemp. S. Asia 133 (2016).

2. AMBEDKAR'S PATH TO CONSTITUTIONAL ADVOCACY

Ambedkar's early experience of caste discrimination directly informed the constitutional arguments he would later advance. Born the fourteenth child of Ramji Maloji Sakpal, an army officer, Ambedkar attended school but, along with other untouchable children, was denied ordinary classroom access; forbidden from touching the water container used by higher-caste students, he depended on a school peon to pour water for him and, in the peon's absence, went without, an experience he later characterised in his own writing as "no peon, no water."[4] He went on to obtain a degree in economics and political science from Bombay University, a double master's degree from Columbia University in New York, and a doctoral thesis from the London School of Economics, an educational trajectory that gave him the comparative legal and economic vocabulary he would later bring to constitutional drafting.

Testifying before the Southborough Committee, also known as the Franchise Committee, in 1919, Ambedkar argued for reservations for untouchables and other religious groups alongside unrestricted adult suffrage, disputing the liberal nationalist tendency to overlook social segregation founded on birth rather than doctrine, and maintaining that democratic political institutions and the caste system were fundamentally incompatible.[5] This argument placed him in direct tension with the Gandhi-led nationalist movement, which upheld a reformed varnashrama rather than caste's abolition. His 1928 statement before the Indian Statutory Commission, and his subsequent participation on the Bombay Presidency's committee investigating the social and educational conditions of depressed classes, produced concrete institutional recommendations, scholarships, residential facilities, and the removal of restrictions on depressed-class recruitment into the police and army, that anticipated the affirmative-action architecture the Constitution would later formalise.[6]

At the First Round Table Conference in 1930, Ambedkar outlined a "Scheme for Political Safeguards for the Protection of the Depressed Classes," insisting on a fundamental right rendering untouchability unlawful for all public purposes, the invalidation of existing discriminatory disabilities, and guaranteed legislative representation.[7] The disagreement between Ambedkar and Gandhi over separate electorates for untouchables, which culminated in the 1932 Communal Award and Gandhi's fast unto death against it, was resolved through

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4 Dr. Babasaheb Ambedkar: Writings and Speeches, vol. 12, pt. I, at 661-691 (Vasant Moon ed., Education Department, Government of Maharashtra 1993).

5 Bidyut Chakrabarty, B.R. Ambedkar and the History of Constitutionalizing India, 24(2) Contemp. S. Asia 133 (2016).

6 Dr. Ambedkar Foundation, Ministry of Social Justice & Empowerment, Government of India, Dr. B.R. Ambedkar Writings and Speeches, vol. 17, pt. III.

7 Id.

the Poona Pact, which substituted joint electorates with reserved seats for separate electorates.[8] Ambedkar's insistence that the depressed classes could be represented only by persons who shared their lived experience of caste subordination, articulated at the Second Round Table Conference, reflected a jurisprudential premise, that the moral authority to advocate for a community's constitutional protection derives from having shared its suffering, that would later inform his insistence on Scheduled Caste representation within the Constituent Assembly itself.[9] Ambedkar's Columbia University teacher John Dewey influenced his view of social change as a continuous necessity rather than a threat to sacrosanct tradition, a pragmatist orientation reflected extensively in Ambedkar's Annihilation of Caste, where he urged caste Hindus to abandon inherited practice that ignored the interests of lower-caste Hindus while cautioning the downtrodden classes themselves against uncritical reverence for the past.[10]

3. CONSTITUTIONAL MORALITY: FROM AMBEDKAR'S SPEECH TO CONTEMPORARY DOCTRINE

Ambedkar's most consequential conceptual contribution to Indian constitutional law may be constitutional morality, a term he introduced to the Constituent Assembly debates and defined as a paramount reverence for the forms of the Constitution enforced not by law but by the growth of a national conscience willing to observe those forms scrupulously, rather than mere adherence to majority preference.[11] He warned that Indian society had not yet cultivated this constitutional morality, given the country's history of caste hierarchy, and that its absence would render formal constitutional guarantees hollow without sustained civic cultivation. Ambedkar's warning rested on a specific historical diagnosis: a society that had, for centuries, organised its entire moral vocabulary around caste hierarchy could not be expected to internalise, merely by virtue of a new constitutional text, the very different moral vocabulary of equal citizenship the Constitution demanded. Constitutional morality, on this account, names the gap between the formal adoption of a democratic constitution and the substantive cultivation of the civic habits necessary to sustain it, a gap Ambedkar regarded as India's most acute constitutional vulnerability.

This warning has proved doctrinally durable well beyond its original context. In Government of NCT of Delhi v. Union of India, the Supreme Court invoked constitutional morality extensively in resolving a dispute over the distribution of executive power between the Delhi government and the

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8 Bindu Puri, The Ambedkar-Gandhi Debate 198 (Springer 2022).
9 Id.
10 Id. at 200.
11 B.R. Ambedkar, Constituent Assembly Debates (Nov. 4, 1948).

Lieutenant Governor, holding that constitutional functionaries must act within a framework of constitutional morality rather than raw political majoritarianism, and expressly tracing the concept to Ambedkar's Constituent Assembly speech.[12] The Court's reasoning in that case treated constitutional morality as a check specifically on institutional actors who might otherwise invoke formal legal authority to defeat the cooperative, accountable structure of government the Constitution's federal design contemplates, extending Ambedkar's original concern with popular majoritarianism to the more specific problem of institutional actors exploiting textual ambiguity to entrench their own authority. The Supreme Court applied the same doctrine still more consequentially in Navtej Singh Johar v. Union of India, where it relied on constitutional morality to strike down the criminalisation of consensual same-sex conduct under Section 377 of the Indian Penal Code, holding that constitutional morality requires courts to protect fundamental rights even against prevailing social morality where the two diverge.[13] The Navtej Singh Johar Court's reasoning is worth dwelling on specifically because it extends Ambedkar's framework to a category of exclusion, based on sexual orientation, that the historical Ambedkar did not himself address, yet the Court's method, identifying a socially sanctioned exclusion and testing it against the Constitution's own internal commitments rather than against prevailing public sentiment, replicates precisely the analytical move Ambedkar had made in confronting caste exclusion seven decades earlier.

The doctrinal trajectory from Ambedkar's 1948 speech to these contemporary applications illustrates a pattern central to this paper's argument: Ambedkar's constitutional contributions operate not as historical artefacts confined to the drafting period but as living interpretive resources that Indian courts continue to invoke when confronting precisely the tension he anticipated, between majoritarian social preference and the individual rights a constitution is meant to secure against that preference. Constitutional morality, so understood, supplies the doctrinal bridge between Ambedkar's biographical experience of caste-based exclusion and the Constitution's later application to categories of exclusion, based on gender identity, sexual orientation, and other grounds, that Ambedkar himself did not specifically address but whose underlying structure, majority-sanctioned exclusion masquerading as social consensus, his framework was designed to resist. The concept's continuing citation across doctrinally unrelated fields, federal executive power in one case, personal autonomy and sexuality in another, is itself evidence that Ambedkar had identified something more general than a solution to the caste problem specifically: a structural diagnosis of how constitutional guarantees can be

[12] Government of NCT of Delhi v. Union of India, (2018) 8 S.C.C. 501 (India).
[13] Navtej Singh Johar v. Union of India, (2018) 10 S.C.C. 1 (India).

hollowed out by majoritarian pressure even where the constitutional text itself remains formally intact.

4. THE CONSTITUTIONAL ARCHITECTURE AGAINST CASTE DISCRIMINATION

Ambedkar grounded his conception of justice in the equal rights of all persons, holding that social justice was attainable only alongside political and economic justice, and that a nation could not develop while leaving a portion of its citizens in a state of enforced depression.[14] As Chairman of the Drafting Committee, he shaped a set of fundamental rights considerably more detailed than the bills of rights found in comparable constitutions of the period, a design choice reflecting India's social diversity and the specific historical burden of caste. Article 14 guarantees equality before the law and equal protection of the laws; Article 15 prohibits discrimination on grounds of religion, race, caste, sex or place of birth; Article 16 guarantees equality of opportunity in public employment; Article 17 abolishes untouchability; and Article 23 prohibits traffic in human beings and forced labour.[15] These provisions collectively translate Ambedkar's structural critique of caste, that the system operated by assigning privilege and its perpetuation through heredity, into justiciable constitutional text: where caste had previously determined an individual's occupation, property rights and educational access without regard to personal aptitude, Articles 14 through 17 removed the constitutional legitimacy of any such hereditary allocation of rights and opportunity.

Ambedkar's analysis of caste as a system of graduated privilege, in which Brahmins were treated as entitled to exclusive religious and educational functions while untouchables were denied even the ordinary rights of civil society, supplied the sociological premise underlying this constitutional design.[16] The Directive Principles of State Policy reinforce the same egalitarian architecture in non-justiciable form: Article 38 directs the State to secure a social order in which justice, social, economic and political, informs all institutions of national life, a formulation that reflects Ambedkar's insistence that formal legal equality alone could not remedy centuries of structural exclusion.[17] The distinction between the justiciable Fundamental Rights and the non-justiciable Directive Principles was itself a matter of considerable debate within the Constituent Assembly, and Ambedkar's own position, that the Directive Principles supplied instructions to future governments regarding the kind of social and economic order the Constitution contemplated even where courts could not directly enforce them, reflected a pragmatic judgment about

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14 Ambedkar, supra note 1.
15 The Constitution of India, 1950, arts. 14-17, 23.
16 Bindu Puri, The Ambedkar-Gandhi Debate (Springer 2022).
17 The Constitution of India, 1950, art. 38.

the limits of judicial capacity to engineer social transformation, a judgment that has itself generated an extensive body of subsequent constitutional theory concerning the proper relationship between the two parts of the Constitution.

Part XVI of the Constitution supplements this framework with specific provisions for Scheduled Castes, Scheduled Tribes, Anglo-Indians and socially and educationally backward classes, including reserved seats in the House of the People under Article 330, reserved seats in state legislative assemblies under Article 332, and the requirement under Article 335 that the claims of Scheduled Caste and Scheduled Tribe members be considered in public service appointments consistently with administrative efficiency.[18] These provisions were themselves the product of hard-fought negotiation within the Constituent Assembly, since they required reconciling Ambedkar's insistence on guaranteed representation, itself a direct legacy of his position at the Round Table Conferences discussed in Part 2, with competing concerns about administrative efficiency and national integration that other members of the Assembly pressed. Read together, these provisions constitute not an incidental feature of the Constitution but its considered response to the specific historical injury Ambedkar had spent three decades documenting before the Constituent Assembly ever convened.

5. ARTICLE 17 AND THE ABOLITION OF UNTOUCHABILITY: STATUTORY AND JUDICIAL ENFORCEMENT

Article 17's declaration that untouchability is abolished and its practice in any form forbidden required statutory implementation to acquire practical force, and Parliament accordingly enacted the Untouchability (Offences) Act, 1955, subsequently renamed the Protection of Civil Rights Act, 1955, criminalising the enforcement of disabilities arising from untouchability.[19] The Supreme Court's interpretation of Article 17 has consistently read the term not in its literal or grammatical sense but as referring to the historically specific practice of caste-based social exclusion. In State of Karnataka v. Appa Balu Ingale, the Court considered a case in which the accused had obstructed members of a Scheduled Caste community from drawing water from a public borewell on the ground of their caste status; reversing a High Court acquittal that had applied an unduly sceptical standard to the testimony of the affected Dalit witnesses, the Supreme Court held that untouchability constitutes an indirect form of slavery and an extension of the caste system, that the caste system and untouchability would rise or fall together, and that the constitutional obligation under Article 17 binds private individuals directly, requiring the State to take affirmative steps to prevent and punish its violation rather than treating it as a matter for

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[18] The Constitution of India, 1950, arts. 330, 332, 335.

[19] The Protection of Civil Rights Act, No. 22 of 1955 (India).

private redress alone.[20] The Court's reasoning, drawing on comparative civil rights jurisprudence including the United States Supreme Court's decision in Jones v. Alfred H. Mayer Co., emphasised that mens rea is not a necessary element of offences under social-welfare legislation of this kind, and that courts must adopt a purposive, socially responsive interpretation attentive to the lived reality of caste oppression rather than a narrowly textual one.[21]

This jurisprudence directly operationalises Ambedkar's insistence, evident throughout his advocacy before the Southborough Committee and the Round Table Conferences, that formal legal abolition of a discriminatory practice is meaningless without an enforcement mechanism capable of reaching private conduct, since untouchability as practised historically operated overwhelmingly through private social exclusion rather than direct state action. Article 17 is, in this sense, one of the few provisions of the Fundamental Rights chapter expressly designed to bind private individuals rather than merely restraining state action, a structural departure from the ordinarily vertical application of fundamental rights that reflects the specific historical injury the provision was drafted to address. This horizontal application distinguishes Article 17 sharply from Articles 14, 19 and 21, each of which operates primarily against the State and requires the additional doctrinal work of establishing state action, or at minimum a sufficiently public function, before a private actor's conduct falls within their reach. Ambedkar's own experience, recounted in Part 2, of being denied water by fellow schoolchildren rather than by any organ of the colonial state, illustrates precisely why he regarded a purely vertical conception of rights as inadequate to the problem he was drafting the Constitution to solve: the harm of untouchability was, in the overwhelming majority of instances, inflicted by private individuals acting within an entirely private social order, and a constitutional guarantee confined to restraining state action would have left that private order almost entirely untouched.

The Appa Balu Ingale Court's insistence that mens rea is not a necessary element of Protection of Civil Rights Act offences reflects a further doctrinal choice consistent with Ambedkar's structural analysis of caste: because untouchability operated as an ingrained social practice rather than a series of discrete, deliberate acts of malice, requiring proof of specific discriminatory intent in each case would have rendered the statute largely unenforceable against a practice that many of its perpetrators regarded, precisely because of its social normalisation, as unremarkable rather than malicious. By dispensing with a subjective intent requirement, the Court's interpretation treats the objective fact of caste-based exclusion as sufficient for liability, a structural rather than individualised approach to remedying discrimination that mirrors Ambedkar's

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20 State of Karnataka v. Appa Balu Ingale, A.I.R. 1993 S.C. 1126 (India).

21 Id.; Jones v. Alfred H. Mayer Co., 392 U.S. 409 (1968).

own diagnosis of caste as a systemic rather than merely interpersonal phenomenon.

6. REVISITING THE AMBEDKAR-GANDHI DIVERGENCE: SAMDARSHITA AND EQUALITY

Ambedkar's conception of justice is best understood against his sustained disagreement with Gandhi over the proper approach to caste. Gandhi, seeking to preserve Hindu unity against British rule, argued that untouchability was a distortion of an otherwise legitimate varnashrama system, comparing caste to a body afflicted with an ugly growth that ought to be treated rather than destroyed outright.[22] Ambedkar rejected this analogy directly, asking rhetorically whether a man must follow his ancestral calling even where it does not suit his capacities, has ceased to be profitable, or has become morally objectionable, and concluding that no such obligation could be sustained.[23] Where Gandhi prioritised national unity and pursued reform through what he understood as Niti and Dharma together, Ambedkar prioritised justice through an institution-centred approach, insisting that existing caste-based inequalities could not be morally defended regardless of their contribution to nationalist solidarity. Ambedkar's practical campaigns, including the 1927 Mahad satyagraha asserting untouchables' right to draw water from a public tank, and the 1929 and 1930 temple-entry movements at Poona and Nashik, tested this position against lived social resistance; their limited success demonstrated, in Ambedkar's own reading, that untouchables would not be accepted as equals within Hindu social structure through moral suasion alone, reinforcing his conviction that constitutional and legal guarantees, rather than social reform internal to Hinduism, offered the more reliable path to equality.[24]

Ambedkar's resulting conception of equality, which he termed Samdarshita, equi-mindedness, entailed the elimination of arbitrary advantage within the social and economic system regardless of whether the underlying inequality resulted from individual choice or inherited status, a formulation that anticipates the modern doctrine of substantive rather than merely formal equality that Indian courts would develop across subsequent decades.[25] This concern for eliminating arbitrary hereditary advantage, rather than merely prohibiting overt discriminatory acts, finds its clearest textual expression in Articles 14, 15 and 16 as a triad, and its later doctrinal elaboration in the equality jurisprudence examined in the following Part.

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22 M.K. Gandhi, Hindu Dharma 318 (Navajivan Publishing House 1950).

23 Bindu Puri, The Ambedkar-Gandhi Debate (Springer 2022).

24 Vidhu Verma, Colonialism and Liberation: Ambedkar's Quest for Distributive Justice, 34(39) Econ. & Pol. Wkly. 2804 (1999).

25 Dr. Babasaheb Ambedkar: Writings and Speeches, vol. 1 (Education Department, Government of Maharashtra 1979).

7. RESERVATION JURISPRUDENCE AFTER AMBEDKAR

The affirmative-action architecture Ambedkar embedded in the Constitution has generated a substantial body of subsequent case law testing its scope and limits. In State of Madras v. Champakam Dorairajan, decided shortly after the Constitution's adoption, the Supreme Court struck down communal reservations in state medical and engineering college admissions, holding that Article 29(2)'s prohibition on discrimination in educational admission prevailed over communal quota schemes absent specific constitutional authorisation, a decision that prompted the First Constitutional Amendment and the insertion of Article 15(4), which for the first time expressly empowered the State to make special provision for the advancement of socially and educationally backward classes.[26] The episode is instructive precisely because it shows the Constitution's equality provisions operating as a genuinely dynamic text rather than a fixed settlement: the Court's initial, formalistic reading of equality in Champakam Dorairajan produced a result inconsistent with the substantive vision of equality Ambedkar had championed, and Parliament's response, amending the Constitution within a year of the decision, demonstrates that the constitutional settlement Ambedkar helped negotiate was always understood by its framers as requiring active, ongoing maintenance rather than static textual fidelity alone.

The Court's later decision in Indra Sawhney v. Union of India upheld reservations for Other Backward Classes under Article 16(4) while confirming that such reservations must rest on social and educational backwardness rather than economic criteria alone, capping reservation at fifty per cent save in exceptional circumstances and excluding the creamy layer among backward classes from reservation benefits, a refinement consistent with Ambedkar's own insistence that affirmative action must track genuine disadvantage rather than operate as an undifferentiated group entitlement.[27] The creamy-layer principle in particular reflects a concern Ambedkar himself would likely have recognised: that a reservation scheme designed to remedy structural exclusion could, over time, be captured disproportionately by the relatively more advantaged members of an otherwise disadvantaged group, defeating the redistributive purpose the scheme was designed to serve. The Indra Sawhney Court's insistence on periodic identification and review of backward classes, rather than a fixed, unreviewable list, similarly reflects the dynamic, evidence-based approach to affirmative action that Ambedkar's own committee work, discussed in Part 2, had modelled decades earlier when he pressed the Bombay Presidency's State Committee to base its recommendations on documented social and educational conditions rather than assumption.

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[26] State of Madras v. Champakam Dorairajan, A.I.R. 1951 S.C. 226 (India); The Constitution (First Amendment) Act, 1951 (India).

[27] Indra Sawhney v. Union of India, 1992 Supp (3) S.C.C. 217 (India).

This body of jurisprudence, running from Champakam Dorairajan's insistence on formal equality through Indra Sawhney's more textured account of backwardness, traces a doctrinal arc that begins with the equality provisions Ambedkar drafted and continues to develop in response to conditions his original text could not have anticipated in full, confirming that his constitutional design was built with sufficient interpretive openness to accommodate seven decades of subsequent social and economic change. That openness is not incidental to Ambedkar's drafting method; it reflects his own repeatedly stated view, evident in his Constituent Assembly interventions, that the Constitution should function as a living framework capable of responding to changing social conditions rather than a fixed code frozen at the moment of adoption, a view that finds direct confirmation in the extended, still-ongoing judicial elaboration of the very provisions he shaped.

8. CONCLUSION

Dr. B.R. Ambedkar's central constitutional project was the eradication of a caste system he regarded as fundamentally incompatible with democratic government, pursued through the total legal disestablishment of caste-based hierarchy rather than its incremental reform. His analysis, that caste operated as a rigid system of hereditary privilege and disability incapable of accommodating individual aptitude or aspiration, supplied the sociological foundation for the equality provisions of Articles 14 through 18, the Directive Principles' vision of social and economic justice, and the special provisions of Part XVI, each of which continues to structure Indian constitutional adjudication today. His disagreement with Gandhi was not a disagreement over ultimate objectives but over method: where Gandhi sought reform compatible with Hindu social unity, Ambedkar insisted that justice for the depressed classes required legal guarantees enforceable independent of, and where necessary against, prevailing social consensus. That methodological disagreement, rather than any difference in ultimate aspiration, is what gives the Ambedkar-Gandhi debate its continuing relevance to constitutional theory: it is, at bottom, a disagreement about whether justice for a historically excluded group can safely be entrusted to the moral evolution of the excluding majority, or whether it instead requires an external, enforceable guarantee that does not depend on that majority's continuing goodwill.

This paper has shown that Ambedkar's constitutional contributions are not confined to the historical moment of drafting but continue to generate active doctrine: constitutional morality, the concept he introduced to describe the disciplined civic reverence a constitution requires to function, now supplies the interpretive foundation for decisions as consequential as Government of NCT of Delhi and Navtej Singh Johar, addressing questions of executive federalism and personal autonomy that Ambedkar himself never directly confronted. Article 17's abolition of untouchability, given statutory teeth through the

Protection of Civil Rights Act and interpreted expansively in State of Karnataka v. Appa Balu Ingale, remains one of the Constitution's few provisions binding private conduct directly, a structural choice reflecting Ambedkar's own insight that caste discrimination operated principally through private social exclusion rather than state action. The reservation jurisprudence traced in Part 7, from Champakam Dorairajan through Indra Sawhney, demonstrates a comparable pattern of continuing doctrinal elaboration, in which courts and Parliament together have repeatedly returned to refine the affirmative-action architecture Ambedkar first embedded in the constitutional text, testing it against changing social and economic conditions rather than treating it as a settlement fixed for all time.

Ambedkar gave the untouchables the constitutional right to enter temples, to draw water from public wells, to pursue education and employment of their own choosing, and the formal abolition of untouchability itself; that these rights continue to generate live constitutional litigation nearly eight decades after the Constitution's adoption is the clearest measure of the durability of his constitutional design. What emerges from this analysis is a picture of Ambedkar's legacy considerably more precise, and more consequential, than the general reverence with which his constitutional role is often described: he supplied Indian constitutional law not merely with a set of provisions but with an interpretive method, one that treats formal legal equality as necessary but insufficient, insists on enforcement mechanisms capable of reaching private as well as state conduct, and measures a constitution's success not by the elegance of its text but by whether it succeeds, over time, in dismantling the specific structures of exclusion it was drafted to address. Judged by that standard, the continuing judicial elaboration of constitutional morality, Article 17 and the reservation provisions examined in this paper suggests that Ambedkar's constitutional project remains, seven decades on, very much unfinished business rather than settled history.

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