

(Im)Propriety in Use of National Symbols in Protests: A Study in the Indian Context

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Abstract

Indubitably an outcome of centuries of dissent and resistance, these values of our national symbols are once again being invoked and embraced by a plethora of protesting groups both within and beyond the boundaries of our nation. At such a juncture, it becomes pertinent to discuss the nuanced yet essential balance between the right to use these symbols in protests and the duty to respect them. This essay discusses the importance of symbols in forging a sense of unity and groupness amongst people of various communities and how these symbols represents both the present and the past of the nation. It then chronicles the evolution of these national symbols through a history of their adoption, followed by a study of the ever evolving characteristics of these symbols along with the reverence and sanctity bestowed upon them. The essay then presents a brief study of the recognition of the right to protest and its importance within our democratic framework. Following this, the essay critically analyzes the duty to respect national

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symbols vis-à-vis the right to protest and attempts to establish through a study of various theories and examples how whilst there exists a prima facie conflict between these two concepts, such conflict is fallacious. To conclude, this essay argues that as long as the use is lawful, these symbols in protests should be celebrated and not rebuked as it is a manifestation of our democracy in action.

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Introduction

The issue related to the right to use national symbols in protests in contrast to the duty to respect them assumes great relevance at a time and age when over six decades after the Indian Constituent Assembly unanimously adopted the National Anthem and the National Flag, various protesters in and beyond the nation have employed these very symbols in a variety of ways in their protests against the Government and its decisions. These symbols condense the nation's history, knowledge, values, ideals, and memories at the time of their adoption. More often than not, national symbols serve as a reminder of a country's glorious past. They serve as a focal point for the culturally and linguistically diverse men and women of the nation, enabling them to express and navigate all the forces that unite, represent, and strengthen them. However, up to the present moment, and in the backdrop of the recent protests across the nation, a question that lingers in the mind of every Indian is whether she is at liberty to use these symbols for the purpose of protesting against the actions of the contemporary Government. Whether the duty to respect national symbols can be given a new and unusual interpretation to validate their use in resistance movements by the very Indians whom these seek to represent? To answer these questions, the authors seek to dissect the main topic into several issues of special focus which meet each other at the end of every segment to gradually apprise the readers of the propriety use of these symbols in protests in light of the duty to respect them. The authors rely upon various volumes of the Constituent Assembly Debates, well-known literature, research data, and news

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reports to bolster their hypothesis. Through a study of various events at which national symbols have been employed along with the study of pertinent case laws and the directives issued by the Government, the authors undertake to present an analytical perspective on this issue. The structure of this essay permits the readers to first, dispassionately, appreciate the factual background and research findings on this issue and subsequently form an opinion for themselves suited to their understanding and choice. In conclusion, the authors have attempted to summarize the findings set out in the essay after presenting a resolution of the apparent conflict between the duty to respect national symbols and the right of the people to use them as tools of protest.

1. Symbols and Group Identity

At the outset, the authors believe that it is imperative to establish the importance of symbols as a manifestation of group identity. The singular ability of national symbols to ignite fervent emotions of allegiance has been a subject of study for fields, which are as varied as the emotions that these symbols evoke in the hearts and minds of people. According to Schatz and Lavine,¹ national symbols promote national identification in various ways. Primarily, by signifying the group these symbols highlight the individual's identity as a national member. Secondly, by being a tangible representation of the group these symbols provide the individual with a manifest object to identify itself with. They opine that such group symbols guide the

¹ R. T. Schatz, H. Lavine; Waving the Flag: National Symbolism, Social Identity, and Political Engagement, *Political Psychology*. 28/3. 2007. (329-355) P. 329.

identification of the group identity and by means of being a reflection of the group as one; they also communicate ‘groupness’.² They further state that by being a representation of the nation across time, these symbols endow on the individual a greater meaning and purpose.³ Schatz and Lavine state that these symbols are also reflective of the group across time by materializing the group’s past into historical entities, which can be ‘glorified, romanticized and mythologized’.⁴ For example, the Republic of China forbids flying of the Tibetan flag in Chinese Occupied Tibet by forced detention and punishment in an attempt to suppress the identity of Tibetans as a ‘group’ and to undermine the Tibetan unity which poses a threat to the Chinese supremacy in that area.⁵

2. Historical Evolution of India’s National Symbols

The aforementioned viewpoint pertaining to the mythologizing of these symbols can also provide us great insight into understanding the evolution of the emblematic values attached to the Indian National Anthem and the National Flag.

3.1 National Anthem of India

Jana Gana Mana was sung for the first time in December, 1911 at the Calcutta session of the Indian National Congress. At that time, the

² Schatz and Lavine, *supra* note 1, 332.

³ Schatz and Lavine, *supra* note 1, 333.

⁴ *Id.*

⁵ Detention and Prosecution of Tibetans under China’s “Stability Maintenance” Campaign. <https://www.hrw.org/report/2016/05/22/relentless/detention-and-prosecution-tibetans-under-chinas-stability-maintenance> Accession Date: 20.03.2020.

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English dailies hailed it as a song written in the honor of the Emperor King George V, a misconception that the author Tagore himself would have to clear up subsequently in a letter to a friend.⁶ In the decades following its introduction, the song would end up carving a place for itself in the struggle for freedom and owing to its inclusive nature coupled with its celebration of India's diversity, would end up occupying a special place in the hearts of the people. Although when the discussion regarding the adoption of national anthem reached the floors of the Constituent Assembly there were various members who were in favor of Vande Mataram over Jana Gana Mana. The question of the National Anthem was raised a few times whilst the Assembly was in session and the same had been deferred by its Chairman Dr. Prasad until the matter was finally taken up on 24 January, 1950, the day the anthem was adopted by the members of the Constituent Assembly. Rather than taking the decision by formal means of a resolution, Dr. Prasad preferred making a statement conferring on Jana Gana Mana the status of the National Anthem of India whilst also conferring on Vande Mataram an equal status.⁷

3.2 National Flag of India

As for the flag, while it is true that from a technical perspective the Indian National Flag was birthed into existence by the Constituent

⁶ Dr. DK Singh; Constitutional duty to show respect to national anthem: A legislative and judicial response. *International Journal of Law*. 3/4. 2017. (78-83). P. 78.

⁷ Indian Constituent Assembly Debates, January 24, 1950 *speech by* Dr. Rajendra Prasad,

https://www.constitutionofindia.net/constitution_assembly_debates/volume/12/1950-01-24 Accession Date: 04.03.2020.

Assembly which adopted it, anyone chronicling its evolution would recognize that the history of that flag and its symbolism dates much before the 22nd day of July in that fateful year of Independence. As ironical as it may seem right now, the notion of a national flag for India stems out of an imperial initiative following the Revolt of 1857. It emanated from a common practice of that era, which involved adopting flags for colonies under the authority of the Queen.⁸ The first discussion at the national stage for the need of an appropriate flag representative of India was conducted in the context of the anti – partition narrative of 1905 – 06 against the decision to divide the Province of Bengal. Although it is interesting to note that these early discussions regarding the flag were primarily concerned with the semiotic messaging of the flag and not with its popularization or adoption by the masses.⁹ It was much subsequently that people even considered questions regarding the proper or improper usages of the flag, indicative of the kind of reverence and sacrosanctity that the flag had come to assume at the time that such questions were raised. The first major instance of national importance contributing towards this sacrosanctity was the National Flag Satyagraha of 1922 – 23 and the central figure behind this movement was the Father of the Nation.¹⁰ The Satyagraha which lasted around four months was instrumental in elevating a symbol relatively marginal up until that point, into a symbol which became a unifying force in the

⁸ A. Virmani; National Symbols under Colonial Domination: The Nationalization of the Indian Flag. *Past & Present*. 164/1. 1923. (169-197) P. 172.

⁹ S. Roy; “A Symbol of Freedom”: The Indian Flag and the Transformations of Nationalism, 1906-2002, *The Journal of Asian Studies*. 65/3. 2006. (495-527) P. 498.

¹⁰ S. Jha; The Indian National Flag as a Site of Daily Plebiscite. *Economic and Political Weekly*. 43/43. 2008. (102-111) P. 108.

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decisive later stages of the freedom struggle. Albeit, this rise of the flag was not devoid of obstacles as during the same period due to the communal color attributed to it, it was criticized for being an inadequate representation of the nation and eventually, in 1937, the Muslim League officially denounced the proposal to use it as the national flag of the nation. Despite such objections though, when the discussion regarding the national flag was taken up again in 1947 in the Constituent Assembly the resolution proposed by Nehru was adopted unanimously. In fact, two speakers scheduled to speak otherwise withdrew their speeches after hearing Nehru speak about the National Flag, describing it as a sign and symbol of ‘concentrated history’,¹¹ highlighting the widespread acceptance that the flag had assumed even at this divisive stage in Indian history. Through a study of the various speeches delivered at the floor of the house that day, it can be ascertained that the flag was treated as a higher symbol by all those present there and that all the representatives from various communities pledged to the National Flag allegiance individually and on behalf of the community they represent, leading to the flag proclaiming its *Indianness* by belonging to both India and Indians. Fifty years from that year of Independence that air of reverence and sacrosanctity manifested itself in a different fashion when in 1998 tribes in some parts of Orissa hoisted the national flag for the first time invoking the rain gods, praying for a good harvest.¹² Over two decades

¹¹ Indian Constituent Assembly Debates, July 22, 1947 *speech by Pandit Jawahar Lal Nehru*,
https://www.constitutionofindia.net/constitution_assembly_debates/volume/4/1947-07-22 Accession Date: 05.03.2020.

¹² Jha, *supra* note 10, 108.

later, thousands rallied behind the flag during a protest in Hyderabad¹³ exhibiting that despite decades elapsing, the symbolism attached to the flag has been unaffected.

3. Endowment of the Right to Protest

The Right to Protest was originally endowed on the Indian citizens through the adoption of the Article 19(1)(a)¹⁴ on Freedom of Speech and Expression and Article 19(1)(b)¹⁵ on Freedom to Assemble Peacefully and without Arms. The inclusive nature of these two clauses in relation to the Right to Protest is characterized in the decision of the Apex Court in the case of *Mazdoor Kisan Shakti Sanghatan*,¹⁶ in which it was laid down that the right to protest is recognized as a fundamental right under the Constitution. It emphasized the importance of this right in a democracy which rests on participation of an informed citizenry in governance. This shall only be regarded as a reaffirmation of the ratio given in *Re Ramlila Maidan*.¹⁷

¹³ AIMIM supporters take out 'Tiranga Yatra' in protest against CAA, NRC in Hyderabad. <https://www.aninews.in/news/national/general-news/aimim-supporters-take-out-tiranga-yatra-in-protest-against-caa-nrc-in-hyderabad20200110192551/>
Accession Date: 07.03.2020.

¹⁴ The Constitution of India, 1950, Art. 19(1)(a).

¹⁵ The Constitution of India, 1950, Art. 19(1)(b).

¹⁶ *Mazdoor Kisan Shakti Sanghatan v. Union of India & Anr.* (2018) 17 SCC 324.

¹⁷ *In Re Ramlila Maidan*, (2012) 5 SCC 1.

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4. Evolution of Indian National Symbols in the Post-Independence Era

Post-Independence, the nature of access to the flag underwent a change which can be for practical purposes be divided into the pre – Naveen Jindal position and the post – Naveen Jindal position. Through the promulgation of the Emblems and Names (Prevention of Improper Use) Act (“Emblems Act”),¹⁸ the Indian State established a certain monopoly over the flag by laying down grounds on which the flag could not be used by anyone lacking “competent authority”. The Emblems Act prohibits the commercial use of such emblems except in conditions as prescribed by the State.¹⁹ Five decades later, the Flag Code of India was introduced as an attempt to consolidate the laws, conventions, practices, and instructions related to the National Flag.²⁰ According to Roy, these restrictions on the public usage of the flag at those nascent stages of the nation conferred on the State the position of an interim custodian of this infant yet ever – developing nation.²¹ The focus at this stage was skewed towards establishing the recognition of the flag as a State symbol rather than as a symbol of community. In 1971, with the promulgation of the Prevention of Insults to National Honour Act,²² these symbols were afforded further protection by criminalizing any act of insulting the National Flag²³ and

¹⁸ The Emblems and Names (Prevention of Improper Use) Act, 1950.

¹⁹ *See id.*, §5.

²⁰ Flag Code of India, 2002.

²¹ Roy, *supra* note 9, 516.

²² Prevention of Insults to National Honour Act, 1971.

²³ *See id.*, §2.

the National Anthem.²⁴ This was in stark contrast to the treatment of the same in contemporary America. In *Spence*,²⁵ a college student was charged under a Washington State law that prohibited using or publicly displaying an altered American flag. When this case reached the American Supreme Court, the Court held in a *per incuriam* opinion that this State statute was in violation of the First Amendment²⁶ guarantee of free speech. Approximately a decade and a half after *Spence*, in *Johnson*,²⁷ the Court took this right to free speech even further by holding that the burning of the American Flag by Johnson, as a means of protest is an expression protected within the ambit of the First Amendment.²⁸ Whilst nowhere close to the same extent, the liberation of the Indian National Flag happened around three and a half decades later in the year 2004 in the form of *Naveen Jindal*,²⁹ wherein, the Apex Court held that the right to fly the National Flag is a fundamental right guaranteed to the citizens by the Indian Constitution. Whilst the citizens are granted certain rights and liberties to sing the National Anthem, restrictions are placed in order to uphold the constitutional duty to respect it. Through the landmark decision of the Apex Court in the case of *Bijoe Immanuel*,³⁰ the Court redefined the right to freedom of expression. It ruled that a person cannot be compelled to sing the national anthem if a genuine, conscientious

²⁴ See *id.*, §3.

²⁵ *Spence v. Washington*, 418 US 405 (1974).

²⁶ The Constitution of the United States, 1789, Amendment I.

²⁷ *Texas v. Johnson*, 491 US 397 (1989).

²⁸ The Constitution of the United States, 1789, Amendment I.

²⁹ *Union of India v. Naveen Jindal & Anr.* (2004) 2 SCC 510.

³⁰ *Bijoe Immanuel & Ors. v. State of Kerala & Ors.* AIR 1987 SC 748.

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religious reason prevents it. In the case of *Shyam Narayan Chouksey*,³¹ the liberal position taken in *Bijoe Immanuel* was suppressed when the Court mandated that all cinema theatres shall play the National Anthem before movie screening. Ever since, several incidents of assault on people who refused to stand up for the national anthem were reported. This order was subsequently challenged by a film club arguing that forcibly playing the National Anthem in cinemas and insisting that people stand for the same infringe upon their fundamental right and leads to the false equivalence between an exhibition of forced reverence and an actual sentiment of honor. The Supreme Court modified its previous order on January 9, 2018 and held that the playing of the National Anthem in cinemas is optional.³² The citizens are also duty bound to observe the Orders relating to the National Anthem³³ which amongst other things states, “there is no objection to the singing of the Anthem accompanied by mass singing so long as it is done with due respect as a salutation to the motherland and proper decorum is maintained.” Through the foregoing discussion, it becomes clear that the organs of the State have periodically exhorted the aggravated exposure of national symbols to the general public.

5. Right to Protest vis-à-vis the Duty to Respect National Symbols

Tolerance and inclusivity are fundamental to democratism, especially, in a republic abound with multiple ethnicities, cultures, and

³¹ *Shyam Narayan Chouksey v. Union of India & Ors.* (2018) 2 SCC 574.

³² *Id.*

³³ Ministry of Home Affairs, Orders Relating to the National Anthem of India.

communities. As the decades have passed, the Indian National Anthem has inspired many by arousing patriotic sentiments when sung in rhythm. It is representative of the ethos of the country.³⁴ In the understanding of the Carnatic singer TM Krishna, the song alludes to “every citizen who inhabits this land” and within whom lies India, and that further it embraces every “individual who may or may not be its citizen but resides in this land.”³⁵ This is also reflective of the view taken by Sarojini Naidu³⁶ in the Constituent Assembly, when the deliberations with regard to another national symbol, the National Flag, were being carried on. She said, “I therefore speak on behalf of that ancient reborn Mother with her undivided heart and indivisible spirit, whose love is equal for all her children, no matter what corner they come from in what temples or mosques they worship, what language they speak or what culture they profess.”³⁷ The National Flag of India was adopted to not only serve as a representation of the Indian freedom struggle but also as a symbol for the right of the depressed, oppressed and submerged classes on the flag. Based on the prior discussion on the significance of National symbols, one can reasonably

³⁴ Dr. DK Singh; Constitutional duty to show respect to national anthem: A legislative and judicial response. *International Journal of Law*. 3/4. 2017. (78-83). P. 78.

³⁵ National anthem is a protest song: TM Krishna. https://www.business-standard.com/article/pti-stories/national-anthem-is-a-protest-song-tm-krishna-120011601546_1.html Accession Date: 07.03.2020.

³⁶ Constituent Assembly Debates, July 22, 1947 *speech by Sarojini Naidu*, available at https://www.constitutionofindia.net/constitution_assembly_debates/volume/4/1947-07-22 (Accession Date: 06.03.2020).

³⁷ Constituent Assembly Debates, July 22, 1947 *speech by Pandit Jawahar Lal Nehru*, https://www.constitutionofindia.net/constitution_assembly_debates/volume/4/1947-07-22 Accession Date: 06.03.2020.

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assert that they are capable of generating intense emotions conjoined with the pride that one takes in being identified as a national of a country. Social scientists argue that the use of collective symbols may increase people's sense of psychological identification with the nation.³⁸ Tajfel and Turner propose the Theory of Social Identity to understand the significance of symbols, in general. They argue that heightened national identification may be understood as the fundamental reason for outgroup hostility in certain situations.³⁹ During protest, the affected populace may be divided into two groups, the out-group consisting of people protesting against the contentious action of the Government and the in-group consisting of people who are either content with it or are apathetic towards it. People are commonly and readily outraged by mistreatment of symbols that represent their nation which attests to people's strong psychological ties to their nation, and to the objective representations of the national group membership.⁴⁰ Therefore, anger and disapproval over perceived disrespect to national symbols is not too farfetched an outcome. Proceeding with this surmise, the authors argue that the use of national symbols during protests by the out-group may be viewed with anger and disapproval by the in-group. This occurs owing to the fact that the rejection of the actions by the out-group of the 'institution' or the

³⁸ D. A. Butz; National Symbols as Agents of Psychological and Social Change. *Political Psychology*. 30/5. 1991. (779-804) P. 779.

³⁹ J. C. Becker et al.; What do National Flags Stand For? An Exploration of Value Associations across 11 Nations. *Journal of Cross-Cultural Psychology*. 48/3. 2017. (335-352) 335.

⁴⁰ Butz, *supra* note 38, 785.

‘ruling party’ is likely to be perceived as an implied rejection of the national consciousness (one that pertains to the in-groups), thereby, rendering the use of such collective symbols as rather hypocritical in the eyes of the members of the in-group. Furthermore, national symbols are capable of catalyzing political gains when employed by certain political/communal groups propelled by their political considerations. This has an intrinsic lack of harmony with conscientizing the use of these symbols for inviting social and fundamental form of justice to the aggregate public protesting for varying causes around the nation. Undeniably, the politics of a country influence the values that its national flag and the anthem stand for, but the same shall not be left solely in the hands of the politically motivated groups for mistreatment by using it for aggrandizing their narrow, political and, monetary interests. It is essential to maintain a balance between the fundamental right to fly the national flag or the nationalist desire to sing the national anthem and the need to protect and preserve the respectful fabric of the flag both metaphorically and literally.

Protest or political dissent is one of the greatest freedoms gifted by democracy to its citizenry. Historical figures such as Nelson Mandela, Rosa Parks and Martin Luther King, Jr., civil rights pioneers protested in their own manner to help spread their message of inclusion, equality and desegregation whilst denouncing racism.⁴¹ Protests are no novelty in a country like India which has seen a wide variety of them in various

⁴¹ V Peña. Taking a stand by kneeling: An analysis of national anthem protest coverage. University of Nebraska-Lincoln. 2017. P. 3.

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forms and for varied causes, be it the revolutionary kind as was seen during the Revolt of 1857 or the peaceful non – violent satyagrahas during the Civil Disobedience Movement or the comparatively recent Chipko Andolan the modus operandi of which involved hugging trees in order to save them from being felled. Whilst the aforementioned examples merely indicate the tip of the iceberg it does establish that throughout our history protests have been embedded in the fabric of our nation and we have, as people, evolved novel and symbolic means of protests. At the same time as has been established in the preceding part of this essay, the national flag and anthem are both symbols of central importance in the understanding of *Indianness*. Therefore, reiterating what has already been argued before, it is not too extreme to think that there exists a conflict between these two concepts in the eyes of individuals when both of them are merged together and such symbols are used in protests. Although, the authors of this essay argue that whilst *prima facie* it may seem that there exists such a conflict, on a deeper study of both these subjects, i.e., protest and patriotism, it becomes evident that these are but two sides to the same coin. According to Hirschman, in cases where an individual faces dissatisfaction with any institution, the individual is essentially faced with a binary choice, either to exit the institution or to voice one's dissatisfaction and there are various factors that influence this consideration such as other available substitutes and cost.⁴² One such major factor is loyalty, which the individual harbors towards the said

⁴² A.O. Hirschman, *Exit, Voice, and Loyalty: Responses to Decline in Firms, Organizations, and States*. Harvard University Press. 1970.

institution. As has been argued by Rajagopalan, the greater this sense of loyalty towards the institution, the greater the proclivity to voice her dissatisfaction.⁴³ These protests being borne out of the loyalty towards the institution, one can ascertain that protests are patriotic. It is this manifestation of the patriotism of the individual that pushes her, to fight for the idea of the nation that she believes are being compromised by the state of affairs being protested against. Use of such symbols in these protests, the authors argue, as long as lawful, is not disrespecting these symbols but instead elevating them to a higher pedestal by practicing the values and the ideals that these symbols stand for. The commonality amongst most protests, except for a few, is its unstable source of support from the people affected by it. The civil resistance by the ordinary members mostly includes the marginalized, the oppressed and the ones whose voices shall be stifled forever if it is not for organized resistance. At the national level, most people lack the tendency to come to a consensus on how much freedom should be extended in relation to speech & expression and especially protests.⁴⁴ The small segment of protestors in comparison to the colossal impact of the action which is being protested against forms an illusion in the minds of those opposing that the protestors are in fact not fighting ‘for’ but ‘against’ the collective wellbeing of this nation. Therefore, national symbols can be of great use in these protests to bring the marginalized narratives into mainstream discourse whilst giving a

⁴³ Shruti Rajagopalan. India should value the loyalty of those who speak up. <https://www.livemint.com/opinion/columns/india-should-value-the-loyalty-of-those-who-speak-up-11578331943362.html> Accession Date: 06.03.2020.

⁴⁴ Peña, *supra* note 41.

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patriotic undertone to this very act of resistance. When the governed decide to resist governance in a certain way, their resistance ought to be performed with great circumspection and discernment. In the words of Peña, even though the freedom to protest lies at the core of a democracy, “protests are often viewed unfavorably”, which is evident through public response to the events as well as the media coverage of such events. It is in such unusual times that the affinity and closeness to the collective symbols can aid the dissenter in clearing misconceptions about her allegiance to India and its constitutional values. In the recent anti-CAA protests in India, when some of the Muslim protestors were questioned related to their act of hoisting the National Flag atop their houses, they answered by admitting that it was a conscious strategy employed in order to express their love and loyalty to the nation that birthed them.⁴⁵ Whilst it is a worrying trend that citizens of the country are repeatedly being questioned on their patriotism, refreshingly, as an answer to this question these citizens are now embracing these symbols and wearing them on their sleeves. The authors argue that the concept of nationhood shall not at any cost preclude the legitimacy and desirability of democratic dissent. Disagreement followed by debate and reformation are distinguishing features of a true democracy.

⁴⁵ Fatima Khan. Tricolour, Anthem — India’s Muslims on why they’re using national symbols in protests. <https://theprint.in/india/tricolour-anthem-indias-muslims-on-why-theyre-using-national-symbols-in-protests/347741/> Accession Date: 20.03.2020.

Conclusion

Durkheim wrote that, ‘the soldier who dies for his flag, dies for his country; but as a matter of fact, in his own consciousness, it is the flag that has the first place.’⁴⁶ This succinctly underlines the conflation of the symbol and the nation whilst also highlighting the potency of the symbol to not just serve as a stationary object of representation but also its ability to evoke action. The same has been the case in the Indian scenario as well, where the symbolism and the imagery of our national symbols have been repeatedly invoked to remind the populace of the values upon which this nation was founded. The use of these symbols in protests have led to polarizing reactions on both sides of the issue, wherein, the argument on one side is that such acts sully the sacrosanctity of these symbols and on the other side the argument is to embrace these symbols and incorporate them in protests wholeheartedly. As has been established above, it is the firm belief of the authors that such a conflict is fallacious. Our national symbols themselves are a result of decades of resistance and dissent and, therefore, the authors argue that the highest respect to these symbols is to stand for the ideals and values that these symbols are borne out of and that as long as they are used in protests lawfully, such use should not be criticized but instead celebrated as manifestation of democracy in action.

⁴⁶ E. Durkheim, *The Elementary Forms of the Religious Life*. Dover Publications. 2012. P. 220.

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