

maternal and divine was developed to challenge the hegemony of cartographic grid and contour lines and how 'Vande Mataram' was used for that purpose. She shows how effective this strategy became by quoting the example of Khudiram Bose, who wrote the words 'Vande Mataram' on his dhoti and in his statement before he was hanged for killing two British women in 1908.

Chapter 4 deals with the birth of the first temple dedicated to *Bharat Mata* which enshrines the map of India in place of a goddess image. Interestingly, although it is part of the tourist map of Benares, apart from tourists, the Indian populace has shown no interest in the temple. On the other hand, the Bharat Mata temple at Hardwar contains both the map and an image and is popular.

In Chapter 5, Ramaswamy applies the feminist scholar Eve Sedgwick's concept of male homo-sociality to analyse the relationship between men through the medium of women, who appear as exchange objects in male transactions and interests. Taking several examples, she shows how *Bharat Mata* was miniaturised and placed in the background to glorify important political figures such as Gandhi. Lamenting the fact that women are conspicuously absent in the cartographic representations of *Bharat Mata*, Chapter 6 seeks to explore a feminist pictorial history of India. Ramaswamy studies the art of Amrita Sher-Gil and the contributions of Sister Nivedita and Madam Kama to the Indian freedom struggle. The chapter ends with a detailed study of Indira Gandhi.

Ramaswamy's 'Epilogue' is thought provoking and seeks to answer two questions: why does the nation yearn for a form; and where did this yearning take it in the late colonial and post-colonial periods. In answer to the first question, the author postulates that the popular bazaar posters of *Bharat Mata* bring a tangible and meaningful presence to modern Indians who feel that India is indeed a beloved land of Hindu gods and that *Bharat Mata* is mother to them all. She further argues that the pictures of *Bharat Mata* 'want' the devotion and worshipful reverence of the Indian citizen. She answers the second question by suggesting that during the nationalists' early fight against the colonial state, the map of India was included in the anthropomorphic form of the mother so as to generate love, service and sacrifice for the nation.

Ramaswamy deserves to be congratulated for producing a detailed history of *Bharat Mata* as seen through paintings and street posters. The large number of illustrations has made this book very attractive. It is a 'must read' for feminists, historians, Indologists, geographers and cartographers.

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Ronojoy Sen, *Articles of Faith: Religion, Secularism, and the Indian Supreme Court* (New Delhi: Oxford University Press, 2010), ISBN 9780198063803, xli + 237 pp., Rs675, hdbk.

The issue of 'faith in law' is a highly contested one in Indian Constitutional law. Ronojoy Sen's timely book analyses judicial interventions on the role of religion in society. Its focus is to unpack the Supreme Court's interpretation of the Indian Constitution's right to freedom of religion (Articles 25 to 30) from the 1950s onwards and the influence this has had on issues of secularism and nationalism. Sen sets out how the Court has determined the contours of the right to freedom of religion and pushed through a reformist agenda on religion at the expense of freedom of religion and neutrality. While the Court's initial approach was expansive, giving

considerable freedom to religious denominations, during the 1960s when Justice Gajendragadkar became a forceful voice on the Bench, there was a considerable marginalising of religion in the public sphere together with a rationalisation and homogenisation of Hinduism. The rulings also exposed an overlap between judicial discourses on secularism and the ontology of Hindu nationalism.

The Court's focus on regulating religious institutions and practices separates core elements of the religion into those that are beyond regulation, and those which are subject to regulation. The Court developed an essentiality test which, as Sen argues, has its origins in the colonial-era doctrine of 'justice, equity and good conscience' for determining what constitutes religion. The test was used primarily to judge the constitutionality of religious practices in the context of Hinduism and to modernise and rationalise the tradition, a move that was subsequently, somewhat ironically, used by the Hindu Right to legitimise Hindutva.

Sen considers the Court's treatment of religious minorities in relation to specific issues, such as the state regulation of minority educational institutions; appeals to religion in the course of election campaigns; religious conversions; and the contentious issue of the Uniform Civil Code. Sen's analysis focuses on the judicial trends in favour of increased state regulation in relation to all these issues. What emerges is a majoritarian tendency in the Court's rulings that favours Hindus and Hinduism, though this is rarely made explicit in the Court's rulings.

Sen's writing style and arguments are lucid and make for a highly readable book. *Articles of Faith* will be of interest to students and scholars of Constitutional law and those interested in understanding the complexities of the right to freedom of religion and judicial understandings of the role of religion in public life and nation-building.

The central shortcomings of the book relate to Sen's handling of secularism, and the comparative examples he invokes from other jurisdictions, especially the United States. While he identifies secularism as a contested concept and understands the distinction between a neutrality model and one based on equal treatment of all religions, these distinctions are frequently obscured in his discussion of case law as well as, at times, in his own analysis. His analysis would have also benefited from a broader referencing of the recent scholarship on Indian secularism. A further weakness in Sen's argument relates to his understanding of the right to freedom of religion in the USA. On many occasions, he seems to suggest that the US courts do not usually sit in judgment on religious error or truth. However, as scholars such as Winnifred Sullivan (in *The Impossibility of Religious Freedom*) argue, US courts have constantly engaged in what constitutes religion and true religious practices and thus are engaged in constructing 'what is religion'. As Sullivan argues, the right to freedom of religion is in fact impossible. Drawing on such insights would have strengthened the comparative angle of the book as well as rendered explicit the astonishing fact that emerges from Sen's highly competent analysis that even in India the right to freedom of religion, at least in law, is in fact impossible.

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