

# ARTICLES 25, 26 AND THE ESSENTIALS OF RELIGION

## ABSTRACT

When one goes into reading the various judgments involving questions based on Articles 25 and 26 of the Constitution of India, he tends to observe that there are numerous aspects the courts have to deal with. One of the interesting aspects out of these is the concept of '*essentials of religion*'. The three basic questions which are usually framed in these judgments are as follows:

1. Whether the individual has a right under Article 25 of the Constitution to profess, practice and propagate religion and the same is not against public order, health, morality or any of the rights conferred under Part III to any other individual(s)?
2. Whether the group seeking protection under Article 26 of the Constitution constitutes a religious denomination or a section thereof?
3. If any of the questions above, as the case may be, is answered in the affirmative, then whether the practice for which protection is sought either under Article 25 (1) or Article 26 (b) is an essential part of the religion?

We shall be discussing these Articles in detail, which includes the rights they protect, the exception to which those rights are subject to, the various interpretations of Supreme Court regarding those rights and exceptions and what is the concept of essentials of religion. Further, we shall see the applicability of these interpretations in three landmark judgments, and finally filter out all the rules laid down by the Supreme Court from our discussion regarding Articles 25, 26 and the essentials of religion.

**KEYWORDS:** Essentials of Religion | Religious Denomination | Secular Activities  
| Rights | System of Beliefs

## WHAT IS RELIGION?

The definition of religion has one essential component and that is 'belief'. Edward B. Tylor gave the most basic definition of religion- "*Religion is the belief in spiritual beings*"<sup>1</sup>. From thereon, the definitions started to evolve, each attempt being more complex than the previous one in order to cover this vast concept.

In the Indian Constitution, the word 'religion' has been cited in a number of articles with Articles 25 to 28 directly dealing with the concept. However the constitution does not define the term. But the courts have attempted to define it and the most acceptable definition was that given in the case of *The Commissioner, Hindu Religious Endowments, Madras v. Sri Lakshmindra Thirtha Swamiar of Sri Shirur mut*<sup>2</sup> ('Shirur mutt case' hereon) by former Chief Justice B.K Mukherjea. Briefly, the Honorable judge defined religion as - *a system of beliefs or doctrines that are regarded by the followers as conducive to their spiritual well-being and which is not necessarily theistic*. Further, it was stated that *religion is not merely an opinion, doctrine or belief, but also an outward expression of the same through certain acts or omissions*.

The particular definition links the belief of people to their spiritual well-being through religion. One may have faith in a **superior deity or body or thing** and thus, all his expression of opinion through certain acts or omissions may be directed towards that particular superior in the hope of a better life or death or even life after death. Such can be seen in various Hindu religions where the followers tend to believe in deities such as Shiva, Brahma, Vishnu, Ram and Krishna; and also in Christianity, which places its belief in Jesus Christ and the Bible (a book). On the other hand, one may not believe in such a superior deity or body or thing at all, but may follow certain principles of conduct of life which are regarded by the followers of such religion as morally correct or a way to attain states like Moksha or Nirvana. Such can be seen in religions of Jainism and Buddhism and it is for this reason Justice Mukherjea stated specifically that '*a religion is not necessarily theistic*'.

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<sup>1</sup> P. Tremlett, L.T. Sutherland & G. Harvey, Edward Burnett Tylor, Religion and Culture 47(2017)

<sup>2</sup> AIR 1954 SC 282

## **DIFFERENCE BETWEEN A ‘RELIGIOUS’ ACTIVITY AND A ‘SECULAR’ ACTIVITY**

A **religious activity** is one which is purely directed for the purpose of religion. Performing rituals at a particular time of the day, giving food or milk to an idol and decorating temples in a particular way on a particular day are examples of religious activities. **Secular activities** are those which deal with the administration aspects of the religion in the form of certain economic, financial and political activities, which may not be significant to the religion itself but are necessary for the execution of religious activities. Certain examples include managing the funds and other accounts of a religious temple, organizing a religious procession, providing security to worshippers and maintenance activities of religious institutions.

Therefore, as stated by the court in the *Shirur mutt* case, it is the religious activities that are protected under Article 25 and Article 26 and not the secular ones. Secular activities are open to interference by the state through existing or new laws. For instance, if the state lays down certain laws on how a temple shall be managed or where a mosque will be constructed, then the followers cannot object to such laws as they concern administration aspects of the religion. What the followers are guaranteed under Article 25 and 26 is the right to perform the *religious activities* and thus, any interference by the state (or any other person, group or authority) in such religious activities shall be a violation of Article 25 or 26.

### **THE ESSENTIALS OF RELIGION**

However, not all religious activities are protected under Articles 25 and 26 of the Indian Constitution. It is only the ‘*essential practices of religion*’ that are protected within the ambit. Here comes a concept on which both the *Ananda Margi* cases of 1984<sup>3</sup> and 2004<sup>4</sup> are recognized authorities.

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<sup>3</sup> Acharya Jagadishwarananda Avadhuta and Ors. v. Commissioner of Police, Calcutta and Anr.(1983)4 Supreme Court Cases 522

<sup>4</sup> Commissioner of Police and Ors. v. Acharya Jagadishwarananda Avadhuta and Anr.(2004)12 Supreme Court Cases 808

The **2004 judgment** dealt with the question as to **what are the essential practices of religion**. The division bench, affirming the decision of the 1984 judgment that the ‘tandava’ dance is not an essential religious practice of the Ananda Margi religious denomination, stated that those practices which are fundamental to the religion so as to form its superstructure and without which the religion will not be a religion, are deemed as ‘essential practices’ of that religion. The test given by the bench to determine whether a part or practice is essential to a particular religion is to see whether the nature of the religion would be changed without the part or practice in question. If the changing or taking away of such a part or practice brings a fundamental change in the religion, then that part or practice is an ‘essential’ aspect of the religion.

The **1984 judgment** scrutinized the aspects of the ‘tandava’ dance and held that it is not an essential practice of the Ananda Margi denomination. It answered the question as to **how the courts must determine the essential practices of religion**. In conformity with the *Shirur Mutt* judgment, the court answered that it must be determined from the tenets of that religion.

## **ARTICLE 25 OF THE CONSTITUTION OF INDIA**

Article 25 of the Indian Constitution deals with the rights of **individuals**. It consists of two parts. The first part may be regarded as the right conferring part of the Article while the second one lays down certain restriction upon such rights.

Article 25(1) protects the right of individuals towards freedom of conscience and to freely **profess, practice and propagate religion**. A significant inference of the courts of clause (1) is that Article 25 not only protects one’s ideas or belief, but also protects all acts done in pursuance of that religion, and this is evident from the words ‘practice of religion’.

However these rights are subject to certain restrictions, which are stated in Article 25(1) as well as in Article 25(2):-

1. Article 25(1) confers the above stated rights except when they run counter to public order, morality and health. The State has power to restrict religious practices when it seems that these are against public order, morality and health. In *Sardar Syedna Taher Saifuddin*

*Saheb v. State of Bombay*<sup>5</sup> the Supreme Court held that *the State may even restrict those practices which are essential to the religion.*

2. In *Sabarimala Verdict*, the term ‘morality’ under Article 25(1) has been construed to mean ‘Constitutional Morality’, which means the religious practice sought to be protected under Article 25(1) has to adhere strictly to Constitutional principles and not run contrary to them. It does not mean what the general public holds morally correct, but what the Constitution of India does.
3. In *Adi Saiva Sivachariyargal Nala Sangam and Ors. v. Government of Tamil Nadu and Anr.*<sup>6</sup> it was held that a member of a religious community has a right to practice the religion, *as far as he does not interfere with the corresponding rights of his co-religionists to do the same.*
4. Another exception to 25(1) was explained in the above case, which is, the *rights conferred on others by Part III provisions of the Constitution of India.* As per the example given by the court, if a person propagates his religion by converting another person into another religion, this would violate the latter’s freedom to conscience and thus the practice, no matter how essential to the former’s religion, is liable to be restricted by the state<sup>7</sup>.
5. Article 25(2) (a) holds that the State has a right to regulate and restrict any economic, financial, political or any other secular activity which may be related to a religious practice. Examples of such activities include maintenance of religious institutions, regulation of funds and accounts, providing for land for religious institution, security of pilgrims and worshippers etc.
6. For the **second part** of Article 25(2) (b), it was settled in *Sri Venkatramana Devaru v. State of Mysore and others*<sup>8</sup> that the true nature of the right conferred by Article 25(2) (b) is a right conferred on all classes and sections of *Hindus* to enter into a public temple.

Contrary views have emerged in the construction of the **first part** of Article 25(2) (b) to which there has been no answer given till date by the Supreme Court. In *Sardar Syedna* (supra) the Supreme Court held in 1962 that the phrase ‘*laws providing for social welfare*

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<sup>5</sup> 1962 AIR 853; 1962 SCR Supl.(2) 496

<sup>6</sup> (2016)2 Supreme Court Cases 725

<sup>7</sup> *Ibid*

<sup>8</sup> 1958 AIR 255; 1958 SCR 895

*and reform*’ does not imply that the state could make laws to alter the whole religion out of existence by interfering with the basic and essential parts of religion. It only allows interference in those practices *which are not essential to the religion*.

However, a contrary view was held in *Shirur mutt* case that Article 25(2)(b) allows the state to make laws for social welfare and reform *even though it might interfere with the basic practices of a religion*.

Although, the question stands open for consideration in a future case, later judgments which have touched upon the construction of Article 25(2)(b) have spoken in favor of the *Shirur mutt* view.

## **ARTICLE 26 OF THE CONSTITUTION OF INDIA**

While Article 25 deals with the rights of individuals, Article 26 confers rights upon **‘religious denominations and sections thereof’**. So what constitutes a religious denomination? The answer has been given in several judgments, but the first to do so was the *Shirur mutt* case. As per the courts, a religious denomination is one in which:

- there is a collection of individuals with a **common system of beliefs** or doctrines based on religion which they regard conducive to their spiritual well-being;
- there is a **common organization**; and
- they are known or labelled by a **distinctive name**.

The fulfilment of these three conditions enables a religious group to enjoy protection under Article 26.

Now, coming to the rights conferred by Article 26 upon such religious denominations, there are four. Subject to public, morality and health, a religious denomination or sect has the right to (a) establish and maintain institutions for religious and charitable purposes, (b) manage its own affairs in the matter of religion, (c) to own and acquire movable and immovable property, and (d) to administer such property in accordance with law.

**Article 26(a)** enables a religious denomination to establish and maintain institutions, resembling the right given to religious minorities under Article 30. The difference between the two rights is

that article 30 only confers the right upon minorities based on religion or language, while Article 26(a) is directed towards groups based upon religion and need not necessarily be in minority.

As far as **Article 26(b)** is concerned, the main question arises on the scope of the words '*affairs in the matter of religion*'. In *Shirur mutt Case*, it was held that there needs to be drawn a fine line between what are matters of religion and what are not. It was stated that the practices which are *purely religious in nature and are essential to the religion* are the ones a religious denomination or a sect thereof has the right to manage over. The matters related to administration of property or institutions are not matters of religion to which Article 26(b) applies. Further, it was stated that a religious denomination has complete autonomy in deciding as to what are the essential rites and ceremonies of their religion as per the tenets of that religion and no outside authority can interfere in such decision. However, in case of dispute, the courts have the power to decide whether the tenets of a particular religion regard a certain practice as essential or not<sup>9</sup>.

**Article 26(c) and (d)**, as held by the *Shirur mutt* judgment, are on a different footing. What these two articles confer is the right to acquire movable or immovable property for the purpose of the religious practice and administer the same *in accordance of law*. The final words make it clear that unlike Article 26(b), the rights under (c) and (d) can be regulated by the legislature by imposing laws. Article 26(c) and (d) are subject to the laws made by the legislature. Further, in *Durgah Committee case*, it was held that Article 26(c) and (d) merely protect rights which are already vested in the religious denomination, but they do not create new ones. This means that if the right to own and acquire movable or immovable property and administer the same has been given to some other authority from the beginning as per a statute or has been given up by the religious denomination voluntarily, then the religious denomination cannot invoke Article 26(c) and (d) to gain such rights. The clauses come into operation only when the rights belonged to the religious denomination from the beginning and thus, they protect only continuing rights.

Similar to Article 25, the rights conferred under Article 26 are subject to public order, morality and health. In terms of Article 26(b), an important point was highlighted in *Sabarimala verdict*. The rights under Article 26 are to be read harmoniously with those under Article 25(2) (b). Apart from the above mentioned restrictions, the right to manage its own affairs in the matter of religion

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<sup>9</sup> Acharya Jagadishwarananda Avadhuta and Ors. v. Commissioner of Police, Calcutta and Anr.(1983)4 Supreme Court Cases 522

under Article 26(b) is subject to laws made under Article 25(2) (b), that is, to throw open a religious institution of public character to all classes and sections of Hindus. In other words, even though entry into a temple of public character will be management of its own affairs in the matter of religion, it shall be subject to any law which throws open such institution to all sections and classes of Hindus.

## **LANDMARK CASES TO UNDERSTAND APPLICABILITY**

It is now understood what is protected under Articles 25 & 26 and what is not. However, it is not as simple as stated above. Many a times the courts find it difficult to demarcate between such religious and secular activities, or in other words, where the state may interfere and impose laws and where it cannot. To decide upon this issue, significant amount of reasoning and study is done by the judges before they can pronounce their judgements. In order to see how courts deal with questions related to these two Articles, it is important to study various landmark judgments involving the questions related to Article 25 and 26. Three of such judgments are given below.

### **SHIRUR MUTT CASE**

The *Shirur mutt case* can be regarded as the judgment which laid down significant principles in the context of religion and Article 25 & 26.

In this case, the petitioners had challenged the constitutional validity of the Madras Hindu Religious and Charitable Endowments Act, 1951 ('the Act' hereinafter). As per the petitioners, the Act violated the fundamental rights of the Mathadipathi, the religious head of the Shirur mutt temple in Udupi under Article 25 and that of the Math under Article 26 by allowing the Hindu Religious Endowments Board constituted under the Act to interfere in the accounts and administration of the temple. In regard to Article 25 and 26, the following issues were dealt with:

1. Whether Article 25 can be invoked as it only protects rights of individuals and here the case involves an institution?
2. Whether the Math is a religious denomination under Article 26?



The court held:

1. It is not the institute but the mathadipathi who professes or propagates the belief of the religious group. It is irrelevant for the purpose of Article 25 whether he professes and propagates those beliefs on his own behalf or that of the institution. Therefore, if any law violates his freedom to profess, propagate or practice his beliefs, Article 25 can be invoked.
2. It was this judgment in which the components of a religious denomination was laid down, that is, that *it should be a collection of individual having a common faith, a common organization and a distinctive name.*

Regarding whether the followers of Madhwacharya can be regarded as a religious denomination, the Supreme Court held that there were several religious teachers after the well-known teacher Shri Sankaracharya who formed different sects and sub-sects. Out of these, one teacher was Madhwacharya who formed 8 Maths in Udupi including the one involved in the dispute. Each of such sects and sub-sects are designated by a distinctive name, and has a common faith and a common spiritual organization, and hence, can be classified as religious denomination. The Math in dispute was found to be in charge of Sivalli Brahmins who formed a section of the followers of Madhwacharya. Since Article 26 also contemplates 'sections thereof', the Math was held to come within the purview of Article 26.

## **S.P MITTAL CASE**

Sri Aurobindo society was established by the disciples of Sri Aurobindo, including the main disciple known as the Mother. The society was registered under the West Bengal Societies Registration Act, 1961 and aimed at spreading the teachings of Sri Aurobindo which included cosmic salvation, the theme of internal yoga and other principles for well-being. It particularly aimed at bringing different cultures of the world together and spread international peace, owing to which the UNESCO recognized the society. The society received funds for development from the Government and other domestic and international NGOs after the initiative of UNESCO along with the Government of India. However, after the death of the Mother, the funds were mismanaged and appropriated for other purposes than the ones it was intended for. This in turn led to difficulties within the society and in maintaining law and order. The members finally approached the government to interfere.

The government passed the Auroville (Emergency Provisions) Act, 1980. Through this Act, the Government took over the management of the society for a limited period. The constitutional validity of the Act was challenged. One of the contentions of the petitioners was that the Act took away the followers' rights under Article 25 and Article 26.

The issues that arose regarding Article 25 and 26 were:

1. Whether the members of the Aurobindo society constituted a religious denomination?
2. If yes, then whether there was a violation of their fundamental rights under Article 26 and 25?

A five bench of the Supreme Court held:

1. The **majority view**, led by **Justice Mishra** answered the first issue in the negative.
  - a. It was stated that the followers of Aurobindo never saw themselves as a religion, and this was clear from the preaching of Sri Aurobindo and the Mother who claimed explicitly that what they are establishing is not a religious institution. What was claimed is that they were setting up an organization for people from different countries and cultures to achieve cosmic salvation through the method internal yoga.
  - b. Further, it was based upon this claim that the institution sought exemption from income tax stating that it was a society engaged in scientific research and education. None of the objectives laid out by the society could suggest that there was an intention on part of the preacher Sri Aurobindo or the Mother that they wanted to establish a religious institution.
  - c. Also, it was stated that the requirement to be a member of the Aurobindo society was an acceptance of its ideology and agreement for working towards it. *The members so made were allowed to keep their previous religion* and still be member of the Aurobindo society. This was found not to be an aspect of a religious denomination.

The court found this enough to conclude that the followers of Sri Aurobindo did not constitute a religious denomination.

2. The majority view, for the purpose of this second issue, assumed that the disciples of Sri Aurobindo constituted a religious denomination while the dissenting view firmly believed that they were a religious denomination. But on the second question, the judges *unanimously answered in the negative*. It was held that the Act did not violate the rights of the disciples under Article 25 and 26. What the Government took over through the act was the management of the society and nothing else and that too for a limited period. The Act does not take away the right to of the disciples to manage its own affairs in the matter of religion but only takes the right of management. Further, Article 26(c) and (d) allow the legislature to impose laws in accordance of which the religious denomination will have to administer their property.

Talking about Article 25, it was held that Auroville was not a place to profess, practice and propagate religion but to impart teachings of international peace and conduct scientific research, which were not ‘religious’ at all but had a secular character. Therefore, it was held that the Act did not infringe upon the fundamental rights of the Society members under Article 25 and 26.

## **ANANDA MARGI CASE OF 1984**

The Ananda Margi was established in the year 1955 by Shri Ananda Murti. Around 1966, a particular form of dance inspired from the God Shiva was included as one of the religious practices of Ananda Margi by Shri Ananda Murti. The dance form included ‘tandava’ dance carrying a skull, a knife, a trishul, a lathi and a damroo. At certain intervals, a procession had to be carried out in public with the display of the above stated items and weapons. Against this, an order was issued by the Commissioner of Police under section 144 of the Code of Criminal Procedure, 1973 to restrain the petitioners from carrying any items in public that can be used as a weapon. To this, the petitioners filed a writ petition under Article 32 of the Constitution of India to restrain the respondent Commissioner of Police and the State of West Bengal from prohibiting their practice in public.

It was contended that the ‘Tandava’ dance in the above stated manner was *an essential practice* to Ananda Margi followers and prohibiting them from doing so violates their fundamental rights under Article 25 and 26. The following issues arose:

1. Whether the Ananda Margi was protected under Article 25 of the Constitution?
2. Whether the Ananda Margi constituted a religious denomination under Article 26?
3. Whether the practice of 'Tandava' dance in public in this form was an essential practice to the Ananda Margi so as to be protected as 'an affair in matters of religion' under Article 26(b)?

The Supreme Court held:

1. For protection of Article 25, it was necessary to establish that Ananda Margi constituted a religion so that the individuals following it had the right to freely profess, practice and propagate. However, the petitioners themselves asserted that Ananda Margi is a Shaivaite order of the Hindu religion, that is, followers of God Shiva under the Hindu religion. In addition to this, the court took into consideration the writings of Shri Ananda Murti and all of them were founded on Hinduism philosophy. The court concluded that Ananda Margi is not a different religion as to allow the followers protection under Article 25.
2. As far as the question of constituting a religious denomination was concerned, the court held that Ananda Margi fulfilled all three conditions required as per *Shirur mutt* case. Firstly, the followers of Ananda Margi constituted a collection of individuals having a common faith for their spiritual well-being. Secondly, they were a common organization and third, they were known by a distinctive name. Hence, the court held that they constituted a religious denomination.
3. Having been declared a religious denomination, it was to be seen whether the 'Tandava' dance form constituted an essential practice so as to be protected under Article 26(b). The court in this regard followed the principle that *whether a practice is essential or integral to a religion is to be determined from the tenets of that religion*. The courts found that Ananda Margi was established in 1955 and at that time, the 'Tandava' dance was not even included as an essential rite. The same was admitted by the petitioners themselves. It was only around 1966 that it was made as an essential practice, which was only 16 years prior to the current petition.

Additionally, even if it is assumed that 'Tandava' dance is essential to the Ananda Margi followers, the display of the same in public as an essential practice could not be proved by

the petitioners and was therefore doubtful. Therefore, the particular practice was not ‘an affair in matters of religion’ so as to be protected under Article 26(b).

## SUMMARY OF RULES

We have seen the various interpretations of Articles 25 and 26 by the Supreme Court, along with their respective exceptions. We have analyzed what is protected and what is not under them. We have also seen their applicability in the above four landmark decisions. Now, the rules that have been established by the courts throughout these years must be summarized. The well-settled rules that can be carved out are as follows:

1. **Religion** is not merely an opinion, doctrine or belief, but also an outward expression of the same through certain acts or omissions. It is defined by the courts as a system of beliefs that the followers regard as conducive to their spiritual well-being and which is not necessarily theistic.
2. It is the *religious activities* that are protected under Article 25 and 26 and not the *secular* ones. Secular activities are open to interference by the ‘State’ through existing or new laws. Any interference by the State in religious activities shall be in violation of Articles 25 or 26.
3. Even in religious activities, not all activities or expressions are protected under these two Articles. Only the *essential religious practices* are protected. These essential religious practices must be determined by courts from the tenets of that particular religion.
4. An ‘essential’ part or practice of religion is one which is so fundamental to that religion such that a change or removal of it tends to change the nature of the religion altogether. The part or practice must be such so as to form the basis of that religion, without which, a religion is no religion.
5. Article 25 of the Indian Constitution protects the rights of **individuals** while Article 26 tends to protect rights of **religious denomination or sections thereof**.
6. Article 25 protects not only one’s beliefs or ideas towards religion, but also the acts done or outward expressions towards such religion, and this is evident from the words ‘practice of religion’ used in the Article.

7. Article 25(1) confers rights upon individuals except when they run counter to public order, health and morality. If a person's religious practice is found to be counter to these three, *the state may restrict even those practices which are essential to the person's religion.*

8. The term 'morality' under Article 25 (1) means 'Constitutional morality', that is, the religious practice for which protection is sought should adhere to the principles of the Constitution.

9. A member of a religious community has the right to practice his religion *as far as his practice does not interfere with the corresponding rights of his co-religionists to do the same.* The same is applicable on the rights of others under Part III of the Constitution. In other words, his practice should not interfere with any of the rights under Part III of other individuals, *no matter how essential the practice is to the person's religion.*

10. For protection under Article 26, it must be established that the religious group in question is a *religious denomination or a section thereof.* The conditions that need to be satisfied are:

- there is a collection of individuals with a common system of beliefs or doctrines based on religion which they regard conducive to their spiritual well-being;
- there is a common organization; and
- they are known or labelled by a distinctive name.

11. Similar to Article 25, the *affairs in the matter of religion*, on which a religious denomination has rights to manage under Article 26 (b), must be *purely religious* in nature and *essential* to the religion in question.

12. A religious denomination has complete autonomy in deciding as to what are the *essential aspects* of their religion as per the tenets of that religion, and no outside authority can interfere in that decision. However, in case of dispute, the courts have the power to decide as to whether a particular aspect is essential to the religion or not, taking into account the same tenets of that religion.

13. The rights conferred by Article 26 (c) and (d) can be regulated by the legislature by imposing laws.

14. Article 26 (c) and (d) merely protect rights already vested in a religious denomination, but do not create new ones.

15. The restrictions of Article 25 (2) (b) on rights of **individuals** under Article 25 (1) are also applicable to **religious denominations** on their rights to manage their own *affairs in the matter of religion* under Article 26 (b).

## CONCLUSION

Our Constitution recognizes the importance of protecting an individual's and a religious denomination's rights to follow and practice their religion, subject to certain exceptions. At the same time, it recognizes the need for allowing the State to interfere in such aspects of the religion which are not religious in nature at all. For this purpose, the courts have developed the concept of essential religious practices, which allows courts to demarcate between aspects of religion the State can interfere in and what not. Owing to this, it becomes necessary to know the concept of 'Essential Religious Practices', branching out of Articles 25 and 26 of the Constitution of India.

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## SPECIFIED WORD LIMIT

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