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Education, Health and Livelihood Rights of Tribal Communities in Telangana

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Abstract
This doctrinal research paper examines the protection of Scheduled Tribe rights in the Scheduled Areas of Telangana, with particular reference to Bhadradri Kothagudem district. It evaluates the relationship between the Fifth Schedule to the Constitution, the Telangana Scheduled Area Land Transfer Regulation, 1959 (as amended), the Provisions of the Panchayats (Extension to the Scheduled Areas) Act, 1996 (PESA), and the Forest Rights Act, 2006 (FRA). It also considers constitutional jurisprudence and administrative evidence, including the Ministry of Tribal Affairs' district-wise forest-rights data reported in February 2026. The central argument is that the effectiveness of protective law depends not merely on formal prohibitions against land alienation but on coordinated recognition of tenure, genuine village-level participation, transparent adjudication, and accessible remedies. The district presents a particularly important context because land, forests, customary governance, and resource-based development intersect within a significant Scheduled Tribe population. Official data indicate substantial progress in title distribution alongside a large unresolved claims burden; these figures describe administrative outcomes, not independently verified household-level welfare. The study concludes that protection must be measured by security of possession, recognition of collective resource rights, informed participation in decisions, and timely enforcement. It proposes a rights-based administrative framework integrating land records, FRA claims, PESA Gram Sabhas, legal aid, and public monitoring.
Keywords: *Scheduled Tribes; Fifth Schedule; Bhadradri Kothagudem; Telangana; land alienation; PESA; Forest Rights Act; Gram Sabha; constitutional justice.*

I. Introduction

The protection of tribal rights is an important measure of the Indian constitutional commitment to substantive equality. Tribal communities have historically faced displacement, unequal bargaining power, alienation of land, and restrictions on customary use of forests. These challenges cannot be understood only as questions of individual property. Land and forest resources often sustain livelihood, cultural identity, community institutions, and intergenerational knowledge. A legal response therefore requires attention to both individual entitlements and collective self-governance.

Article 244(1) and the Fifth Schedule create a differentiated administrative arrangement for constitutionally notified Scheduled Areas. The Constitution envisages protective governance rather than a simple extension of ordinary land markets. Paragraph 5 of the Fifth Schedule empowers the Governor, subject to constitutional conditions, to make regulations concerning land transfers, allotments, and moneylending. The framework must be read alongside equality and dignity guarantees and the directive principle in Article 46 requiring special care for the educational and economic interests of Scheduled Tribes.

Bhadradri Kothagudem is a useful district-level focus because its landscape includes forested tracts, tribal habitations, agricultural land, and sites of extractive and infrastructure activity. The district administration reports a population of 1,069,261 in the 2011 Census and an area of 7,483 square kilometres. These are historical census-based figures and should not be represented as a current population estimate [1].

The paper asks whether existing protections form a coherent, accessible system for communities in the district. It distinguishes the legal existence of rights from their actual administrative realization and cautions against treating all land in a district as Scheduled Area: the applicability of special laws depends on the relevant notified territorial boundaries.

II. Statement of Problem and Objectives

The legal problem is the distance between the promise of special protection and the procedural realities of establishing and defending rights. A family may possess land without an updated record; a community may use a forest resource without a recognized community title; a village assembly may exist without effective access to project information. Separate departments administer land, forests, local government, welfare, and legal remedies. Fragmentation can make a formally protective system difficult to navigate.

The primary objective is to analyse the constitutional and statutory architecture protecting tribal rights in the Scheduled Areas of Telangana and assess its implications for Bhadradri Kothagudem. Specific objectives are: to identify safeguards against alienation; to examine recognition of individual and community forest rights; to analyse PESA-based participation; to discuss relevant judicial principles; to interpret available official implementation statistics; and to formulate administratively feasible recommendations.

Three research questions guide the inquiry. First, how do the Fifth Schedule, land-transfer regulation, PESA, and FRA interact? Second, what does the available district evidence reveal—and not reveal—about implementation? Third, which legal and institutional reforms could strengthen access to remedies, procedural fairness, and community control over resources?

The working proposition is that durable protection requires four linked conditions: accurate and publicly accessible tenure information; independent and timely decision-making; empowered Gram Sabhas; and enforceable remedies. Failure in any one condition can weaken the others. The proposition is analytical, not a statistically tested hypothesis.

III. Methodology, Scope and Limitations

This is a doctrinal and analytical legal study using primary legal materials and official secondary evidence. Primary materials include the Constitution of India, the Scheduled Area land-transfer regulatory framework, PESA, FRA, and judicial decisions. Secondary materials include Ministry of Tribal Affairs publications, parliamentary answers, and the district administration's demographic profile. Sources are cited in numbered form, with direct links in the references.

The analysis uses statutory interpretation, constitutional contextualization, and institutional comparison. It asks what a provision requires, which institution must act, and what procedural safeguards are necessary to translate a legal entitlement into an effective remedy. For quantitative discussion, the paper uses the government's figures as reported and avoids drawing causal conclusions from counts alone.

The geographic scope is Bhadradri Kothagudem district, especially its notified Scheduled Areas. Administrative district boundaries, Scheduled Area notifications, forest classifications, and village boundaries are not interchangeable. A parcel-specific legal conclusion would require verification of the notification, revenue survey, title history, and applicable records. The paper does not adjudicate any individual parcel or assert that a named person or institution violated the law.

Limitations are significant. No primary interviews, litigation docket sampling, or field verification were undertaken. District-level data can obscure differences among mandals, communities, and claim types. The February 2026 parliamentary answer provides a useful administrative snapshot as of 31 December 2025, not a longitudinal evaluation of rights realization. Legal provisions and subordinate rules should be checked against their latest authoritative text before litigation or formal submission.

IV. Historical and Socio-Legal Context

Agency administration developed against a history of distinct governance arrangements for hill and forest regions. Colonial regulation and later constitutional protections recognized that ordinary transactions could enable exploitation where economic power and access to documentation were highly unequal. However, protective administration has also been criticized for paternalism when it excludes communities from decisions about their own resources.

The contemporary legal shift is from merely restricting transactions to recognizing substantive rights and participatory institutions. Land-transfer restrictions seek to prevent dispossession; PESA seeks to preserve customary governance and empower the Gram Sabha; FRA addresses historical injustice arising from non-recognition of forest tenure and use. These regimes pursue related objectives but operate through different administrative channels.

The district's social geography matters for legal design. Agriculture, forests, wage work, and access to public services may overlap in a household's livelihood. In such settings, title recognition alone is not a complete measure of security: access roads, water, minor forest produce, cultural sites, and dispute resolution can be equally consequential. The government district profile should be read alongside village-level records before assuming uniform needs [1].

Care is also needed in describing communities. "Scheduled Tribe" is a legal classification determined by notified lists; "Adivasi," "tribal," and community names carry additional historical and social meanings. The paper uses "Scheduled Tribe" when discussing statutory entitlements and "tribal communities" in broader analytical discussion, without assuming that all communities have identical customary systems or land relations.

V. Constitutional Protection under the Fifth Schedule

Article 244(1) makes the Fifth Schedule applicable to the administration and control of Scheduled Areas and Scheduled Tribes in the relevant states. Paragraph 6 concerns the declaration and alteration of Scheduled

Areas by presidential order. Paragraph 3 provides for reporting by the Governor to the President, while paragraph 4 addresses the Tribes Advisory Council. Paragraph 5 permits special modifications and regulations, including regulation of land transfers and moneylending, within the constitutional scheme [2].

The Fifth Schedule is not simply an administrative exception. It reflects a substantive constitutional judgment that formal equality may be inadequate in conditions of historic exclusion. Article 46 strengthens this interpretation by directing the state to protect Scheduled Tribes from social injustice and exploitation. Articles 14 and 21 remain relevant to non-arbitrary administration, fair process, and dignified life.

An important analytical distinction is between the Governor's power and the actual exercise of that power. The existence of paragraph 5 does not itself establish that every proposed protective measure has been notified. Government statements in March 2026 reaffirmed that decisions under paragraph 5 are maintained by the respective state governments [3]. Consequently, legal researchers must identify the operative regulation or notification rather than infer one from constitutional competence.

Effective Fifth Schedule governance requires meaningful reporting, accessible regulatory texts, coordination with the Tribes Advisory Council, and mechanisms for community scrutiny. A publicly available record of land restoration, pending cases, and compliance with protections would make constitutional oversight more measurable. Such transparency is a recommendation derived from the constitutional design, not an assertion that any particular reporting practice is absent.

VI. Protection against Land Alienation

The Telangana Scheduled Area Land Transfer Regulation, 1959, historically the Andhra Pradesh Scheduled Area Land Transfer Regulation, 1959, as amended by Regulation II of 1970, forms a central safeguard against impermissible transfers in Scheduled Areas. The post-bifurcation nomenclature appears in Telangana government materials [4]. The legal aim is to prevent transfers that undermine tribal possession and to provide restoration mechanisms under the regulatory scheme.

The significance of the 1970 amendment lies in strengthening restrictions on transfers involving non-tribals in Scheduled Areas. Whether a particular transaction is void and which authority may restore possession require close attention to the operative provision, exceptions, procedural rules, dates, and the land's legal status. A simple assertion that every transfer anywhere in Bhadradri Kothagudem is prohibited would be incorrect.

Land alienation may occur through formal sale, informal possession, debt-linked arrangements, or disputed entries in revenue records. These patterns require different evidentiary approaches. A claimant may need survey numbers, historic records, succession evidence, village testimony, or proof of possession. Lack of documents should not automatically erase an otherwise legally recognizable claim, but administrative decisions must still follow the applicable evidence and due-process requirements.

An effective protection strategy would combine early detection of suspicious mutations, accessible proceedings, prompt execution of restoration orders, and protection against renewed dispossession. Legal aid and translation into local languages are especially important where proceedings are technical. District-level dashboards could distinguish complaints filed, cases decided, land restored on paper, and possession actually delivered; these are different outcomes and should not be collapsed into one figure.

VII. Forest Rights and Historical Justice

The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006 addresses historical non-recognition of forest-dependent communities' rights. Its scope includes individual rights relating to occupation and self-cultivation, as well as a range of community rights, including access to forest resources and community forest resource management [5]. Eligibility, evidentiary requirements, and the distinction between forest-dwelling Scheduled Tribes and other traditional forest dwellers are governed by the Act and Rules.

The Gram Sabha has a central role in initiating and verifying claims, followed by statutory scrutiny through the prescribed committees. Rights recognition should not be reduced to distributing individual titles alone. Community rights can be important for grazing, water access, minor forest produce, cultural practices, and conservation responsibilities. They also raise complex questions about mapping, overlapping use, and inter-village coordination.

In Bhadradri Kothagudem, the district-level figures reported to Parliament provide evidence of substantial administrative activity. As of 31 December 2025, the government reported 139,691 claims received, 68,387 titles granted (68,307 individual and 80 community), 25,060 rejected claims, and 46,244 pending claims [6]. These categories should not be used to infer approval rates without examining claim cohorts, counting conventions, and appeal outcomes.

The gap between individual and community title counts warrants focused inquiry. It does not by itself prove non-compliance: claim demand, types of applications, and classification practices may differ. Nonetheless,

the relatively small number of community titles suggests that the administration should publicly report the status of community forest resource claims separately and provide support for participatory mapping.

VIII. PESA and Gram Sabha Self-Governance

PESA, enacted in 1996, adapts Panchayati Raj institutions to Scheduled Areas. It emphasizes customary law, social and religious practices, traditional management of community resources, and a meaningful role for the Gram Sabha in local planning and resource-related decisions [7]. Its importance lies in treating communities as decision-makers rather than merely beneficiaries of development schemes.

The legal design requires attention to the exact decision at issue. PESA uses distinct formulations—such as approval, consultation, recommendation, or other assigned powers—depending on the subject. These should not be conflated into a universal veto. State law and rules determine operational procedures, while central statutory requirements remain relevant to assessing conformity.

In a Rajya Sabha answer dated 4 December 2024, the Ministry of Panchayati Raj stated that Telangana had adopted PESA within the Telangana Panchayat Raj Act, 2018, and that PESA rules issued on 24 March 2011 were being implemented in the PESA areas of nine districts [8]. This is an official account of legal and administrative adoption; it does not establish that every Gram Sabha meeting is effective or that every subject law has been fully harmonized.

For Bhadradri Kothagudem, meaningful participation would require advance notice, understandable documents, accurate minutes, participation of women and marginalized hamlets, and access to records about projects affecting common resources. Village assemblies should have a clear channel to challenge inaccurate minutes or decisions taken without proper procedure. Capacity building should include both elected representatives and community members.

IX. Judicial Interpretation and the Samatha Principle

The Supreme Court's decision in Samatha v. State of Andhra Pradesh, (1997) 8 SCC 191, remains a landmark in the interpretation of Scheduled Area land protections and mining leases. The litigation arose from leases in a notified Scheduled Area in the then State of Andhra Pradesh. The Court examined the protective land-transfer regulation in conjunction with constitutional obligations and environmental legislation [9].

The judgment's majority reasoning emphasized that protections are intended to preserve tribal possession and prevent the erosion of economic security through non-tribal exploitation of Scheduled Area lands. It placed limits on mining leases to non-tribal private interests under the relevant regulatory framework, while addressing possibilities involving state undertakings and tribal cooperatives subject to applicable law. The case must be read in its statutory and factual setting; it should not be quoted as an unconditional nationwide prohibition on all mining.

Samatha is particularly relevant as a method of interpretation. Rather than isolating land-transfer rules from the Fifth Schedule, it reads protective legislation in light of constitutional purposes. It also illustrates that resource development cannot be assessed solely through revenue or extraction goals where special protections apply.

For contemporary district administration, the practical lesson is that proposals involving Scheduled Area land require careful legal screening: territorial status, ownership and tenure, transfer restrictions, environmental approvals, forest rights, and community processes must be examined together. A lawful development decision needs a documented basis that can withstand judicial review. This is a normative implication of the judgment, not a finding about any current project in Bhadradri Kothagudem.

X. Development, Displacement and Resource Governance

Infrastructure, mining, industrial activity, and conservation measures can create competing demands on land and forests. A rights-based approach does not presume that development is impossible in Scheduled Areas. It insists instead that development decisions comply with protective law, provide accurate information, and address the distinct effects on tenure, livelihood, access, and cultural relationships with land.

For any proposed acquisition or diversion, decision-makers should first determine the land category and whether recognized or pending forest rights are implicated. They must then identify the applicable legal procedure, including requirements arising under PESA, FRA, land acquisition law, environmental law, and any operative state regulations. Consultation and consent are legally distinct concepts; the precise requirement depends on the governing statute and circumstances.

Rehabilitation and compensation cannot be measured only in cash where loss includes common forest access, seasonal livelihoods, and community networks. Assessment should consider women's resource use, access to schools and health care, and the effects of relocation on customary institutions. Public hearings should be intelligible and allow adequate time for scrutiny.

The district-level study would benefit from a publicly available, project-specific rights-impact register. Such a register could record affected villages, applicable Scheduled Area notifications, FRA claim status, Gram Sabha resolutions, mitigation commitments, and grievance outcomes. This proposal is intended to improve procedural traceability without prejudging whether any particular project is lawful or unlawful.

XI. Empirical Snapshot: Forest-Rights Administration

The most specific recent administrative evidence located for this paper is the Ministry of Tribal Affairs' Rajya Sabha response dated 11 February 2026, reporting Telangana figures as of 31 December 2025 [6]. For Bhadradri Kothagudem it lists 139,691 claims received, 68,387 titles granted, 25,060 claims rejected, and 46,244 claims pending. Granted titles are disaggregated into 68,307 individual and 80 community titles.

These numbers indicate three simultaneous realities: the claims process has reached a large number of applicants; a substantial number of titles have been issued; and a substantial pending workload remains. The totals reported across categories sum to the number received, but this arithmetic consistency is not proof that all claims have been correctly categorized or decided. Administrative data must be checked for updates, appeals, re-filings, and whether "pending" includes claims at different statutory stages.

At the state level, the same response reports 231,456 titles granted, including 230,735 individual and 721 community titles, and 329,367 claims pending. The district's figures therefore deserve attention in state-wide monitoring. Direct comparisons between districts would require normalization by eligible population, forest area, claim history, and local administrative conditions.

The evidence does not establish the number of hectares secured, whether beneficiaries received physical possession, the quality of titles, the status of appeals, or livelihood outcomes. A future empirical study should examine a representative sample of case files and conduct ethically approved interviews with claimants, officials, and Gram Sabha representatives. No such field evidence is asserted in this paper.

XII. Institutional and Procedural Challenges

The central challenge is institutional fragmentation. Revenue officials may maintain ownership records, forest authorities may hold compartment maps, tribal welfare agencies may support claims, and Panchayati Raj bodies may maintain Gram Sabha records. Where information is inconsistent, applicants may be required to resolve contradictions that arise within the state's own records. Integrated case tracking could reduce this burden without replacing legally required scrutiny.

A second challenge concerns access to procedure. Claimants may face difficulties with maps, historic documents, notices, travel, translation, or representation. The quality of an adjudication depends on notice, reasons, an opportunity to respond, and access to review or appeal where provided by law. Aggregate disposal statistics cannot substitute for evaluation of these procedural safeguards.

A third challenge is the visibility of collective rights. Individual titles are more easily counted than rights to shared landscapes and seasonal resources. Community forest resource mapping requires sustained engagement, boundary reconciliation, and support for local institutions. Administrative incentives should therefore recognize the quality of community-rights decisions, not simply the number of files closed.

Finally, overlapping policy objectives may generate tension between conservation, infrastructure, mining, and livelihood protection. The appropriate response is not to assume that one statute automatically extinguishes another, but to conduct an integrated legal assessment. The governing hierarchy, procedural safeguards, and factual circumstances must be identified before decisions are taken.

XIII. Findings and Discussion

First, the constitutional framework is protective in purpose but requires specific implementing instruments. The Fifth Schedule authorizes differentiated governance, while the applicable land-transfer regulation supplies operative restrictions. A legal opinion must identify both the relevant Scheduled Area notification and the current text of the regulation.

Second, tenure security is multidimensional. Protection against unlawful transfer, recognition of forest occupation, and community access to resources address related but different risks. Their effectiveness depends on coherent records and enforceable outcomes rather than formal declarations alone.

Third, PESA and FRA share an important institutional commitment to the Gram Sabha, but their statutory functions differ. Administrators should avoid treating a meeting under one legal regime as automatic compliance with every requirement under another. Each decision must satisfy its own notice, quorum, documentation, and substantive standards.

Fourth, the district's forest-rights statistics demonstrate progress and unresolved workload at the same time. The presence of 46,244 pending claims as of the reported date justifies closer administrative monitoring; it does not prove why those claims remain pending. The comparatively small number of community titles similarly identifies a research priority rather than a definitive legal violation.

Fifth, the Samatha judgment underscores the constitutional significance of land and resource protection in Scheduled Areas. Its relevance lies both in the particular interpretation of the regulation and in the broader insistence that public authorities take the protective purposes of the Fifth Schedule seriously.

Together these findings support an implementation-centered understanding of tribal rights: law is effective when individuals and communities can establish, exercise, and defend their entitlements through institutions they can actually access.

XIV. Recommendations and Conclusion

Recommendation 1—integrated rights records: create a district-level system linking Scheduled Area notifications, survey maps, land-transfer proceedings, FRA applications, title records, and Gram Sabha resolutions. Access controls must protect personal information while allowing public oversight of aggregate outcomes.

Recommendation 2—time-bound and reasoned decisions: publish stage-wise pendency statistics and ensure that decisions contain reasons, service of notice, and clear information about available review. Monitor restoration of possession separately from the issuance of orders.

Recommendation 3—community rights and participation: support participatory mapping of community forest resources, train Gram Sabha members in PESA and FRA procedures, and ensure accessible meetings and documentation in appropriate local languages. Women and residents of smaller hamlets should have meaningful opportunities to participate.

Recommendation 4—legal assistance and accountability: expand mobile legal-aid services, establish independent grievance channels, and periodically audit a sample of concluded cases for procedural fairness. Oversight reports should distinguish individual rights, community rights, land-restoration proceedings, and project-related decisions.

Recommendation 5—evidence-based research: commission village-level studies on possession, tenure security, community-resource access, and the experience of appeals. Data collection should use informed consent and avoid exposing vulnerable claimants to retaliation or unnecessary disclosure.

In conclusion, the protection of tribal rights in Bhadradri Kothagudem is best understood as a constitutional governance obligation rather than a narrow welfare measure. The Fifth Schedule, land-transfer regulation, PESA, and FRA provide complementary protections, but their effectiveness turns on accessible institutions and reliable enforcement. Recent government figures show both meaningful recognition of claims and an unfinished administrative task. A rights-based approach that secures land, strengthens collective governance, and makes remedies visible is essential to realizing constitutional justice.

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