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## DECODING ANTITHETICAL RELATIONS BETWEEN FUNDAMENTAL RIGHTS AND THE DIRECTIVE PRINCIPLES OF STATE POLICY

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### Abstract

In a politically charged and ever-changing society, the Indian Constitution is a dynamic and changing framework. To defend their individual rights or advance the common good, citizens frequently—sometimes even hourly—rely on it as the primary point of reference for both public and private issues. The Constitution contains social strands and the essence of democracy. The Directive Principle of State Policy (DPSP) in Part IV and the Fundamental Rights (FR) in Part III of the Indian Constitution are crucial for putting the preamble's principles into practice, achieving its objectives, and creating a welfare state (Vicky, 2024). The Indian Constitution's framers prioritized fundamental rights over directive principles. The paper makes the case that Directive Principles and Fundamental Rights are complementary rather than antagonistic. The welfare and well-being of the populace are the ultimate goals of both. Although Directive Principles are non-justiciable, meaning the courts cannot enforce them, this does not imply that their implementation has been left at the will and mercy of the state. In addition, the paper explains the relationship between Fundamental Rights and Directive Principles of State Policy cases under the Constitution of India.

**Keywords:** Indian Constitution, Fundamental Rights, DPSP, India

### Introduction

No one or anything is above the Constitution, which is India's supreme law. The Preamble, Fundamental Rights, and Directive Principles are among its essential components. The drafting of a Bill of Rights was one of the Constituent Assembly's

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first priorities. This document reflects the values and principles drawn from India's diverse cultural heritage, deeply rooted in the inspiring forces of the national struggle for independence. Comprehending the historical background is essential to appreciating the importance of the Indian Constitution. The addition of a Bill of Rights to India's Constitution, which came soon after the Universal Declaration of Human Rights, was in line with the humanitarian and democratic movements that were then sweeping the world. It also demonstrated the founders' fervent wish to preserve and codify the core values stated in the Universal Declaration. Furthermore, because minorities face difficulties and their rights must be protected, it was thought necessary to include a charter of fundamental rights in the Constitution. The concept of a Declaration of Fundamental Rights had already been rejected in India by the Simon Commission and the Joint Parliamentary Committee, which were involved in the Government of India Act of 1935. According to their logic, "abstract declarations are meaningless unless there is the will and the means to enforce them." However, nationalist sentiment has supported a Bill of Rights since the Nehru Report because of the British regime's experience showing that a subservient legislative might act as the executive branch's handmaid when it comes to defending individual liberty. Therefore, the authors of our constitution embraced Fundamental Rights regardless of British opinion in order to protect individual liberty and to guarantee social, economic, and political justice for all community members (together with the Directive Principle). An avid observer of the Indian Constitution attests to their success in this endeavour (Basu, 2001).

### **Basic Components of Fundamental Rights**

Fundamental rights are basic human rights that are guaranteed to us by the Constitution of India (Tripathi, 2024). The concept of basic human rights involves drawing a list of foundational human needs of both physiological and social importance and, in a way, arriving at a list of the minimum social needs (Pande, 1989).

The word 'fundamental' refers to the constitution, which is the land's fundamental law. Those rights guaranteed by the "Fundamental Law of the Land" to ensure human existence and enforceable against the state are known as fundamental rights. The purpose of these rights is to protect political democracy. They shield individual liberties from governmental overreach and work to stop the emergence of authoritarian or despotic governance. They serve as defences against capricious legislation and executive tyranny. They essentially aim to create a government founded on the rule of law rather than the whims of the people. Since these rights are essential to a person's overall development, the term "Fundamental Rights" reflects the Constitution's commitment to ensuring and defending them. Six primary categories provide protection for these rights, including:

- **Abolition of untouchability and the system of titles under Articles 17 and 18;** prohibition of discrimination on the basis of religion, race, caste, sex, or place of birth (Article 15); equality of opportunity in matters of public employment (Article 16); and equality before the law and equal protection of the law (Article 14) are all parts of the right to equality (Indian Polity, 2025).
- **Protection of life and personal liberty (Article 21),** freedom of speech and expression, freedom of assembly, association or union, freedom of movement, freedom to live and settle anywhere in India, and freedom to engage in any profession or occupation (Article 19) are all included in the right to freedom (Indian Polity, 2025).
- **Articles 23 and 24 of the Right against Exploitation** (forbid child labor, forced labor, and human trafficking in all its manifestations (Indian Polity, 2025).
- **The right to freedom of conscience, profession, practice, and propagation of religion under Articles 25–28**(Indian Polity, 2025).

- The right of minorities to conserve their culture, languages, and script and to establish and administer educational institutions of their choice under Articles 29 and 30 (Arumugam, 2022).
- The right to constitutional remedies to enforce all these fundamental rights under Article 32.

### **Basic tenets of Directive Principle of State Policy**

Part IV of the constitution contains the DPSPs from Articles 36–51, which are unique features of our constitution. It deals with the Directive principles. Besides the precedent of the Irish Constitution, the basic inspiration for the DPSPs came from the concept of a welfare state<sup>2</sup>. While seeking to protect the individual's basic rights, the constitution's framers also saw it as a potent instrument for social change (Kachwaha, 1998). They established appropriate constraints on Fundamental Rights under the guise of "public interest" in order to reconcile any potential contradiction between individual rights and community needs. They also included the Directive Principles of State Policy (DPSPs), which are dedicated to achieving the principles of a true welfare state (Gupta, 1972). These ideas attempt to eliminate economic exploitation, reduce glaring disparities, and ensure social justice by entrusting the state with the task of establishing a just society. These constitutional directives were not merely moral precepts; rather, they were meant to be regarded as legally binding requirements that were essential to the Constitution's human rights framework (Arumugam, 2022). The constitution makers in India did not force on the people any economic system; they only tried to suggest a system that could be most suited to the Indian condition. In the words of K. S. Hedge, *"The Directive Principles constitute an important part of the constitution and an operative part at that, for through them the constitution seeks to achieve the ideal of a democratic welfare state set out in the preamble of*

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<sup>2</sup> Keshvananda Bharti v. State of Kerala, AIR 1973 SC 146

*the Indian constitution and to bring about the social and economic revolution of which the founding fathers of our republic dreamt."*

Fundamental Rights aim to create an egalitarian society, free all citizens from society's restrictions, and make liberty available to all (. The Directive Principles of State Policy (DPSPs), on the other hand, emphasize establishing social and economic goals that can be immediately achieved through a nonviolent social revolution. To give the Indian populace freedom in a more significant and constructive sense, this revolution seeks to address the basic needs of the average person and alter the social structure. A uniform civil code, the right to education, the right to work, and other objectives are among the DPSPs.

### **Why do we need Fundamental Rights?**

The founding fathers of the Indian Constitution realized the need for fundamental rights because they are essential for human existence. These rights, which include the fundamental civil and political freedoms emphasized in the Universal Declaration of Human Rights, are outlined in Part III of the Constitution, more especially Articles 12-35. Our Constitution emphasizes the importance of fundamental rights. They are "the most citizenly part of the Constitution," according to Dr. B. R. Ambedkar. These rights were thought to be essential for protecting citizens' liberties and rights from possible government overreach. The fundamental principles that the people of this nation have upheld since the Vedic era are embodied in these rights. Fundamental rights are always intended to uphold each person's dignity and foster circumstances that allow each person to fully express his or her unique personality. They incorporate a guaranteed pattern into the fundamental framework of human rights (Singh, Undated). It does not infringe on the various aspects of individual liberty; rather, it places negative obligations on the state. They are crucial for a person to reach his or her full potential in terms of intellect, morality, and spirituality. "The Supreme Court has, however, come to believe that fundamental rights are not only 'negative' or

‘against the state’ but also have positive content because they cast certain responsibility on the state. This, in a way, has heralded the beginning of what has come to be regarded as ‘Judicial Activism’ with its byproduct of public interest litigation”<sup>3</sup>. Establishing a government of law, not of man, is the goal of their inclusion in the constitution (Singh, Undated). The establishment of authoritarian and dictatorial rule in the nation is prevented by fundamental rights, which also shield citizens' liberties and freedoms from state intrusion. They are necessary for people's and the nation's overall development. Although they are governed by the Indian constitution, fundamental rights are basically human rights.

#### Importance of DPSP's for an Indian Citizen

The Directive Principle of State Policy is a unique feature of our constitution (Laxmikanth, 2004). These principles are directed towards the ideals of building a true welfare state. Even though they are made unjustifiable under Article 37 of the Indian Constitution, they have guided the Union and the State Legislatures in enacting social reform (Arumugam, 2022). These directives are not enforceable by the courts, and if the government of the day fails to carry out these objects, no court can make the government ensure them. Yet, these principles have been declared to be “fundamental in the governance of the country, and it shall be the duty of the state to apply these principles in making laws” under Article 37 (Basu, 2001). Regardless of the non-justifiable nature of DPSPs, a citizen should be aware of them (Tripathi, 2024). Improving the social and economic standing of society is the primary goal of DPSP in order to enable people to lead fulfilling lives. Being aware of DPSPs aids citizens in monitoring the government. DPSPs are a tool that citizens can use to assess the government's performance and pinpoint areas of deficiency. People should be aware of these provisions because they serve as a benchmark for evaluating the laws that

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<sup>3</sup> Kashyap, 1994: 95

govern them. Moreover, it also constrains the power of the state to make draconian laws (Sharada and Pandey, Undated).

It has been established through several court rulings that maintaining the integrity of fundamental rights is equally important as striking a balance between DPSPs and those rights. Fundamental rights, which are thought to be among the most important components of the Constitution, may be directly or indirectly impacted by disregard for a directive principle.

### **Contrasting Fundamental Rights and DPSPs**

- Fundamental Rights are intended to advance political democracy in India, While the Directive Principles of State Policy (DPSPs) concentrate on forming the nation's social and economic policies (Barak -Erez and Aeyal Gross,2007)
- DPSPs are instruments of instruction for the government. They are not justifiable or enforceable in court, which means an individual cannot go against the state through the courts to enforce DPSPs. However, under Articles 32 and 226 of the Constitution, the Fundamental Rights are enforceable and justified in court. They are regarded as negative rights (Vicky, 2024).
- Fundamental rights are facilities given to the people by the state, whereas DPSPs are directions given by the constitution to the state (Vicky,2024).
- Fundamental rights are individualistic in nature because they promote the welfare of individuals, whereas DPSPs are socialistic in nature because they promote the welfare of the community.
- Fundamental rights do not require any legislation for implementation because they are automatically enforced, whereas DPSPs require legislation for implementation (Vicky, 2024).
- Fundamental rights have a limited scope, whereas the scope of the Directive Principle of State Policy is limitless.



- Fundamental rights protect the individual's rights and work at a micro level, whereas DPSPs protect the rights of a citizen and work at a macro level (Tripathi, 2024).

These are some differences that are evident, yet there is no inherent conflict between them (Vicky, 2024). Instead of having certain distinctions, constitution framers always discussed the coherence between Fundamental Rights and DPSP. The chief sponsor of these principles and who anticipated this conflict, Dr. B. N. Rau, felt that harmonious construction and compromise on the part of the judiciary would, in the future resolve this conflict. Dr. Ambedkar, who is also known as the father of the Indian Constitution, was also of the same view as Dr. Rau and said that *"it is the intention of the Assembly that in the future both the Legislature and Executive should not merely pay lip service to these principles enacted in this part, but they should be made the basis of the legislation and executive action that may be taken hereafter in the matter of governance of the country."*

Justice P. N. Bhagwati defines the inter-relation between Fundamental Rights and the Directive Principle of State Policy as *"it is impossible to fit Fundamental Rights and DPSP in two different and strictly defined categories."* However, one important question that comes to mind is: What will happen if there is a conflict between fundamental rights and DPSPs?

### **Conflicting Views**

From the above observation given by constitution framers, we can safely presume that Fundamental Rights and DPSP are interrelated. But the answer to this question is not as simple as we think. There are a few important judgments regarding this (George, 2023). A major concern regarding the validity of the DPSPs is their compatibility with the Fundamental Rights (Sharada and Pandey, Undated). As we already know, DPSPs are not enforceable laws; they are just directives to the state. It lays down various tenants of a welfare state. On the other hand, fundamental rights



are the guaranteed rights of citizens by the constitution. When the state tries to implement the provisions of DPSPs, there can be a conflict, which is also seen as a conflict between the fundamental rights of the individual and the state. "The issue related to the conflict between Fundamental Rights and Directive Principles of State Policy often arises as the declarations made under DPSP are often more important than Fundamental Rights. Fundamental rights, in their basic nature, are rights enforceable by the courts of law. Any act of state or law that violates Fundamental Rights is ultra vires, whereas the DPSPs are not enforceable by courts of law, and any act of state or law that is otherwise valid cannot be declared void if it is against DPSPs" (Sharma, 2017). Now, we will discuss the judicial interpretation of the contradiction between Fundamental Rights and Directive Principles of State Policy. Whenever there is a conflict between Fundamental Rights and DPSPs, the court views every judicial decision differently. There were cases in which the field of conflict was between fundamental rights and DPSPs, including:

In 1952, the Champakam Dorairajan case presented the Supreme Court with the first notable clash between DPSPs and fundamental rights. A government order that instituted caste-based reservations for jobs and college seats resulted in the denial of admission to a medical college for Champakam Dorairajan, a Madras native. During the Madras Presidency in 1927, this order was passed.

In addition to being the first Supreme Court decision about reservations, this case paved the way for the Indian Constitution's First Amendment. Article 46 of the Constitution and Article 15 of the section on fundamental rights were at odds. *"The State shall not discriminate against any citizen solely on the basis of religion, race, caste, sex, place of birth, or any of them,"* reads Article 15. Article 46, on the other hand, highlights that *"The State shall promote with special care the educational and economic interests of the weaker sections of the people, particularly the Scheduled Castes and Scheduled Tribes, and protect them from social injustice and all forms of exploitation."*

According to the Supreme Court, Article 37 of the Indian Constitution, which states that Directive Principles are not subject to judicial execution, must be upheld. Furthermore, it confirmed that the Fundamental Rights chapter is in control and that the DPSPs must recognize and follow its authority. According to this interpretation, Directive Principles were subordinated to Fundamental Rights. This position was maintained by the court in cases such as *Qureshi v. State of Bihar*<sup>4</sup> and *Sajjan Singh v. State of Rajasthan*<sup>5</sup> over the course of the following fifteen years.

### **Kerala Education Bill (1967): Doctrine of Harmonious Construction**

The Supreme Court adopted the Theory of Harmonious Construction in 1957 after realizing the importance of putting the DPSPs into practice to create a welfare state. The Court ruled that, while DPSPs cannot supersede basic rights, they must be considered when determining the scope of fundamental rights. The harmonious construction principle requires the Court to make every effort to completely execute both DPSPs and Fundamental Rights. The Court further stated that there is no inherent conflict between the two; rather, it is the Court's job to interpret the Constitution in a way that safeguards Fundamental Rights while ensuring the execution of the DPSPs.

### **Golaknath Case (1967)**

The Supreme Court's eleven-judge bench was established for the first time in the Golaknath Case (1967). The Court decided that the DPSPs could not be implemented at the expense of or in violation of fundamental rights. The Indian Constitution was amended by the government because of this ruling. Article 31C was added to Part III of the Constitution, and Articles 13 and 368 were changed by the 24th Amendment Act of 1971. There are two important clauses in Article 31C.

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<sup>4</sup> 1958 AIR 731

<sup>5</sup> 1965 AIR 845,

1. If a law is made to give effect to DPSPs in Article 39(b) and Article 39(c) and, in the process, violates Article 14, Article 19, and Article 31, then the law should not be declared unconstitutional and void merely on this ground.
2. Any such law that contains the declaration to effect DPSPs in Articles 39(b) and 31(c) shall not be questioned in a court of law.

This change made it clear that Parliament can change any provision of the Constitution, including the Fundamental Rights clause (Chaudhry, Khosla and Mehta, 2016). Additionally, it stated that a Constitutional Amendment Act is not considered a "law" for the purposes of Article 13 (Laxmikanth, 2004).

#### **What is Article 39(b)?**

The state shall direct its policy towards securing that the ownership and control of the material resources of the community are so distributed as best to subserve the common good (George, 2023).

#### **What is Article 39(c)?**

The state shall direct its policy towards ensuring that the operation of the economic system does not result in the concentration of wealth and means of production to the common detriment (Georgr, 2023).

#### **Kesavanath Bharathi Case (1973)**

The amendment was contested in the Kesavananda Bharati Case (1973). The Supreme Court of India decided in this case that Parliament could change any provision of the Constitution, including the Fundamental Rights clause (Javaid, 2021). It also said that the fundamental framework of the Constitution could not be changed or destroyed by such amendments. Because it went against the fundamental structure principle established in the case, the Court ruled that the second clause of Article 31C was unconstitutional and void. Nonetheless, the Court maintained Article 31C's first

clause (Javaid, 2021). It also reiterated that Parliament cannot take away the authority of judicial review.

The 42nd Amendment Act, introduced by Parliament in 1976, broadened the application of Article 31C's first clause. The amendment expanded the scope of its application beyond the DPSPs listed in Article 39(b) or (c) to include "any law" intended to implement any of the DPSPs listed in Part Four of the Constitution.

### **Revisiting the Basic Structure of the Constitution**

The fundamental framework Doctrine is a common law legal principle that states that a constitution's legislature cannot change some of its essential features. Through a series of constitutional law cases in the 1960s and 1970s, the Indian judiciary developed the doctrine, which was formally established in the *Kesavananda Bharati v. State of Kerala* case (i. The Court hasn't, however, offered a clear definition of the "basic features" of the Constitution. Rather, it makes a case-by-case determination as to whether a given feature is considered a basic structure. Regarding constitutional amendments, the Supreme Court holds that although Parliament may make changes to the Constitution, it cannot change or eliminate its fundamental framework. Below is a list of some of the "basic" features.

1. The separation of powers principle
2. The goals outlined in the Indian Constitution's preamble
3. Evaluation by the judiciary
4. Articles 226 and 32
5. Federalism (including the state's financial freedom as guaranteed by articles 282 and 293)
6. Secularism
7. The republican, democratic, and sovereign system
8. Individual liberty and dignity
9. National cohesion and integrity

10. The equality principle—not all aspects of equality, but the core of equal justice
11. In part three, the "essence" of additional fundamental rights
12. Using social and economic justice to create a welfare state
13. The harmony between DPSPs and fundamental rights
14. The parliamentary form of government
15. The idea of free and fair elections
16. Limitation upon the amending power conferred by Article 368
17. Independence of the judiciary
18. Effective access to justice
19. Power of the Supreme Court under Articles 32, 136, 141, and 142
20. Rule of law,
21. Supremacy of the Constitution

### **Minerva Mill Case (1980)**

The Supreme Court of India rendered a significant decision in the Kesavananda Bharati case, applying and expanding upon the fundamental structure theory of the Indian Constitution. The Court in this case offered important clarifications regarding the interpretation of this doctrine. The Court ruled that the Constitution itself restricts Parliament's ability to amend the document, so Parliament cannot abuse this authority to give itself unrestricted power. The Court also underlined that Parliament's authority to amend does not include the authority to nullify the fundamental components of the Constitution. In particular, the Court decided that parliamentary amendments cannot weaken fundamental rights, such as the right to equality and liberty, which are a part of the fundamental framework of the Constitution.

Only laws passed to carry out the directives in Articles 39(b) and 39(c) would be protected under Article 31C; laws passed for other DPSPs would not be. In the Minerva Mills Case (1980), the Supreme Court ruled that the extension of protection to all DPSPs was unconstitutional and null and void (Laxmikanth, 2004).

The Supreme Court of India confirmed in *State of Kerala v. N.M. Thomas* (1976) that DPSPs and Fundamental Rights ought to be drafted in a manner that permits their peaceful coexistence. The Court underlined that any disputes between the two must be worked out.

The Supreme Court emphasized the DPSPs' goal of establishing social and economic goals to achieve economic and social democracy in the 1978 case of *Pathumma v. State of Kerala*. The Court underlined that the goal of the Indian Constitution is to incorporate both DPSPs and Fundamental Rights, a goal that has been demonstrated in several other cases.

The Supreme Court upheld the importance of DPSPs in national governance in the 1985 case of *Olga Tellis v. Bombay Municipal Corporation*. The Court underlined that DPSPs are "fundamental in the governance of the country," and that it is the responsibility of the state to incorporate these principles into legislation, citing Article 37 of the Indian Constitution. Therefore, in terms of their meaning and importance, DPSPs ought to be accorded the same weight as Fundamental Rights.

The Supreme Court stressed in the 2007 case of *R. Coelho v. State of Tamil Nadu*<sup>6</sup> that the government must balance the public interest, as stated in the Directive Principles of State Policy, with individual liberty, which relates to fundamental rights.

The Supreme Court ruled in *Ashok Kumar Thakur v. Union of India*<sup>7</sup> that the two types of rights are identical. Fundamental rights cover civil and political rights, whereas the Directive Principles of State Policy (DPSP) concentrate on social and economic rights. The Court further explained that DPSP's inability to be enforced in a court of law does not necessarily mean that it is less effective.

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<sup>6</sup> [2007] 1 S.C.R. 706

<sup>7</sup> (2008) 6 SCC 1 138

In *Dalmia Cement v. Union of India*<sup>8</sup>, the Supreme Court said that DPSPs and fundamental rights are complementary and supplementary to each other (Krishnendu, 2020).

The court stressed that fundamental rights and the Directive Principles of State Policy are complementary, not superior, in cases such as *Smt. Tanuja Tolia v. State of Uttarakhand*<sup>9</sup> and *D. Saritha v. Osmania University* (2020). It has now been determined that these two components do not inherently conflict with one another.

### Conclusion

Maintaining a balance between fundamental rights and the Directive Principles of State Policy (DPSP) is the main objective of the Indian Constitution's essential features (Ray, 2024). These two are intended to be complementary as well as supplementary. The idea of fundamental rights must be in line with the DPSP's tenets. To protect fundamental rights, the state must abide by the rules outlined in the DPSP; otherwise, there may be unfavorable outcomes.

Even though it is challenging to fully implement the social principles outlined in Part IV of the Constitution in an underdeveloped nation like India, these principles should not be written off as unrealistic ideals that will be impossible for future generations to achieve. By adopting these Directive Principles, India is working toward a distinct social vision that has never been tried before in its history. Without using force or violence, the country strives to implement modest social welfare policies equal to those recognized by Western countries in the twentieth century, but within the constraints of its own economy. The Directive Principles in Part IV are crucial to the nation's governance, while being utopian and fundamentally imprecise, rendering them unenforceable by the courts. Ignoring these principles would be ignoring the core of the Indian Constitution, which the state must consider when drafting laws.

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<sup>8</sup> (2017) 13 SCC 693

<sup>9</sup> 2020 SCC OnLine Utt 337



The courts have demolished the idea that there is a contradiction between Directive Principles and Fundamental Rights, emphasizing that, while the rights in Part III are critical to citizens' life, liberty, and security, the principles in Part IV are equally fundamental for national governance. Article 37 requires the state to apply certain standards when developing legislation. As a result, the provisions in both sections are intended to serve the vision of social order described in the Preamble to the Indian Constitution, rather than to inhibit growth. They are thus complementary and mutually reinforcing.

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