

Compare and contrast the rights to protest in England & Wales with such rights in India

Anu Radha Lal

Introduction

Freedom to express dissent is fundamental to a healthy democracy. The right to protest provides citizens with a means to communicate their concerns and seek accountability from individuals, institutions and the State.¹ The right to protest within England & Wales is strikingly similar to that in India because both jurisdictions are historically rooted in colonialism.

As a third-generation Punjabi immigrant woman from the Dalit (“untouchables”) caste, British colonial rule has directly impacted upon me and my ancestors. My ancestors were segregated *and yet* my great-grandfather served the British Army during World War II. Today, my relatives who are farmers in India are persecuted for protesting *and yet* my grandparents’ emigration means I can pursue a career at the Bar of England & Wales. I have colonialism to “thank” for all of the above.

The colonial continuity² in England & Wales and India affects the rights to protest which influences (A) legal framework, (B) practical expression and (C) state policing of protests. These aspects of the right to protest will be compared and contrasted between jurisdictions. For the sake of consistency, the comparisons drawn throughout this essay will feature England & Wales and then India.

The way that these jurisdictions view the protester and their cause shapes its response. This response could be improved by applying Sikh jurisprudence - that is, the study of the ethical principles and values on which Sikhism is based. Three moral directives emerge from the application of Sikh jurisprudence to the rights to protest: 1. Treat all people as equal, 2. Protect the oppressed and 3. Fight against injustice. This essay will apply the moral directives to the three facets in turn to argue that the application of Sikh jurisprudence would significantly improve the rights to protest in both jurisdictions.

¹Hughes, T (2021) *The Right to Protest is Fundamental to a Healthy and Vibrant Democracy* Available at: <https://www.involve.org.uk/resources/blog/opinion/right-protest-fundamental-healthy-and-vibrant-democracy-governments-must-not> (Accessed: 26 August 2021).

²Pattnaik, A (2019) The art of dissolving dissent: India’s seditious law as an instrument to regulate public opinion, Available at: <https://blogs.lse.ac.uk/southasia/2019/10/04/long-read-the-art-of-dissolving-dissent-indias-sedition-law-as-an-instrument-to-regulate-public-opinion/> (Accessed: 26 August 2021).

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Sikh Jurisprudence & Protest

Sikh history

'Protest is not new to Sikhs; rather, it permeates Sikh history, past and present'.³ Three pivotal points in Sikh history set the tone for how Sikhs ought to consider protest. Firstly, the founder of the faith, Guru Nanak told Babur to rule the people with justice and mercy; instead Babur invaded South Asia, massacred innocent people and imprisoned the Guru around 1526.⁴ Secondly, Guru Tegh Bahadur protested for the Kashmiri Brahmins who were being persecuted by the Mughal Emperor Aurangzeb. The protest resulted in the Guru's detention, torture and execution in 1675. Thirdly, during the Battle of Anandpur Sahib in 1704, Sikh troops discovered a fellow soldier tending to the Mughal soldiers' wounds. When summoned by Guru Gobind Singh, the soldier explained that he was taught to see the divine light in all.

The Sikh's duty to protest

The Sikh has a duty to protest in order to seek justice. The Sikh Gurus - who established Sikhism - call on Sikhs to follow their example and live as *sant-sipahi* (*saint-soldiers*) to stand up for justice without regard for the consequences.⁵ Sikhs have protested against the Indian government demanding equal opportunities for decades - even before the 1984 Sikh Genocide.⁶ Today, Sikhs are protesting for farmers' rights against unfair agricultural laws - even in the face of the Bharatiya Janata Party falsely labelling supporters as Khalistani terrorists.⁷ Sikh history informs Sikhs today on their duty to protest. The lessons emerging from the historical moments and contemporary protests can be distilled into three moral directives which will be explored throughout this essay.

³ Singh, S. J (2021) Indian Farmer Protests Are Animated by Sikh Faith, Punjabi History of Fighting Injustice, Available at: <https://berkeleycenter.georgetown.edu/responses/indian-farmer-protests-are-animated-by-sikh-faith-punjabi-history-of-fighting-injustice> (Accessed: 26 August 2021).

⁴ Singh, G Dr. (2018) Sources on the Life Teachings of Guru Nanak, p.178, Available at: <https://sikhbookclub.com/Book/Sources-On-The-Life-Teachings-of-Guru-Nanak> (Accessed: 26 August 2021).

⁵ Note 3.

⁶ Singh, S.J (2018) It's time India accept responsibility for its 1984 Sikh Genocide, Available at: <https://time.com/3545867/india-1984-sikh-genocide-anniversary/> (Accessed: 26 August 2021).

⁷ Berkley Forum (2021) Sikh identity in the Indian farm protests, Available at: <https://berkeleycenter.georgetown.edu/posts/sikh-identity-in-the-indian-farm-protests> (Accessed: 26 August 2021).

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(A) Legal Frameworks

The legal frameworks legislating the rights to protest in England & Wales and India present two differences and share two similarities.

Origins in law

Contrastingly, the rights to protest originate from different sources in England & Wales and India. In England & Wales, the right to freedom of peaceful assembly is established by Article 11 of the European Convention of Human Rights (ECHR). This international treaty is made enforceable into national law through the Human Rights Act 1998. Whereas in India, the right to assemble peaceably and without arms is directly sourced from Article 19 of the Constitution of India.

Qualified rights

In both jurisdictions, the State retains the power to impose restrictions to the rights to protest. The restrictions in England & Wales include if it is 'prescribed by law, necessary, proportionate and in the interest of national security, public safety, preventing crime or disorder, protecting health or morals and protecting others' rights and freedoms'. Similarly, in India, the right is subject to 'reasonable restrictions in the interests of sovereignty and integrity of India, security of the state, friendly relations with foreign states, public order, decency, morality or in relation to contempt of court, defamation and incitement to an offence'.

Understandably, the State must maintain public safety while allowing the exercise of the right to protest. However, the extensive, ambiguously worded restrictions confer a worryingly broad discretion to the State in both jurisdictions. For instance, the State can rely on protecting public 'morals' and 'morality' as a way to restrict the right to protest. Morality is culturally relative, so allowing the State to determine morals and morality is dangerous for marginalised individuals' and groups' seeking to exercise their right to protest.

Covid-19 restrictions

The Covid-19 pandemic prompted the enforcement of restrictions to rights to protest in England & Wales and India. To do so, England & Wales enacted new legislation while India utilised existing

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legislation. The Coronavirus Act and Health Protection (Coronavirus) Regulations 2020 enable police to direct a gathering to disperse, command an individual to return home, use reasonable force to remove a person from a public place and even arrest someone if deemed necessary to maintain public health and order. Likewise, Section 144 of India's Code of Criminal Procedure bans the assembly of more than five people. While mitigating the spread of Covid-19 is undeniably important, the State's use of emergency legislation should be vigilantly monitored to ensure that discrimination does not occur under the guise of protecting public health. For example, it is possible that the State enforces emergency legislation over certain citizens' right to protest than others.

Right-wing governments

England & Wales and India are governed by right-wing parties. A notable difference is the UK governments' centre-right positioning⁸ in comparison to India's Bharatiya Janata Party sitting closer to the extreme right⁹. Right-wing politics tends to view hierarchy and inequality as natural results of traditional social differences, which endangers citizens' universal, democratic freedom to peacefully assemble.¹⁰ The Police, Crime, Sentencing and Courts Bill in England & Wales proposes an offence of 'Public Nuisance' which carries a maximum sentence of 10 years. This can be applied to minor actions such as the non-violent obstruction to the public. Non-violent occupation of public spaces is the very essence of a peaceful protest, yet the Supreme Court in India recently held that occupation of public ways during protest 'is not acceptable'. The Court further asserted that 'the administration ought to take action to keep the areas clear of encroachment'¹¹.

Directive #1 - Treat all people as equal

Sikh jurisprudence centres on equality. Guru Nanak declared 'There is no Hindu and there is no Muslim' and Guru Gobind Singh valued the recognition of a single caste of humanity. The teaching on equality is recorded in the holy text, Guru Granth Sahib which instructs Sikhs to 'accept all humans as

⁸ Lesniara, T (2021) Please stop calling the UK government far-right. Available at: <https://www.aljazeera.com/opinions/2021/6/25/please-stop-calling-the-uk-government-far-right> (Accessed: 11 September 2021).

⁹ Leidig, E (2020) The far-right is going global. Available at: <https://foreignpolicy.com/2020/01/21/india-kashmir-modi-eu-hindu-nationalists-rss-the-far-right-is-going-global/> (Accessed: 11 September 2021).

¹⁰ Smith, T. Alexander and Raymond Tatalovich. Cultures at War: Moral Conflicts in Western Democracies (Toronto, Canada: Broadview Press, Ltd., 2003) p. 30

¹¹ *Amit Sahni v Commissioner of Police and Ors* Civ App No. 3282 of 2020.

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your equals, and let them be your only sect'.¹² The wide discretion afforded by both legal frameworks to restrict the rights to protest provides scarce insulation to marginalised citizens seeking to exercise this democratic right - especially when emergency legislation can be indiscriminately enforced by right-wing parties. The unequal use of statutory restrictions leads to the unfair, prejudicial treatment of certain protesters and not others.

Applying the moral directive from Sikh jurisprudence to treat all people equally can be practically implemented into both legal frameworks. Additional guidance can be produced to read alongside the existing legislation. Guidance could specify examples of when the broad restrictions should and should not be applied by the State. This would mitigate against the risk of the State or police using the restrictions to discriminate against particular social groups, thus ensuring that all people are treated equally.

(B) Practical Expressions

The British Empire's past colonisation of India still affects the way that citizens today can practically express their rights to protest in England & Wales and India. In March 2020, a third of Britons reportedly believed that the British Empire helped more than harmed its former colonies.¹³ Just shy of a century earlier, the Amritsar Massacre was perpetrated by British colonists in my native state, who commanded soldiers to fire into a crowd of non-violent Indian protesters. Yet India clutches onto colonial rule - the sedition law enacted to suppress dissent by the British government has never been revoked.¹⁴

Quelling dissent is vital under colonial rule. In England & Wales, the Black Lives Matter (BLM) movement resurged in 2020 to protest against anti-Black policing, following the murder of George Floyd in the U.S. Following these protests, an independent report found that Black protesters faced discriminatory treatment by the police through unfair targeting, the use of excessive force and violent

¹² Guru Granth Sahib, 28

¹³ Jasanoff, M (2020) Misremembering the British Empire, Available at: <https://www.newyorker.com/magazine/2020/11/02/misremembering-the-british-empire> (Accessed: 26 August 2021).

¹⁴ Khaitan, M (2021) Sec 124A needs a quiet burial in India. Sediton law has no place in a democracy, Available at: <https://theprint.in/campus-voice/sec-124a-needs-a-quiet-burial-in-india-sediton-law-has-no-place-in-a-democracy/712516/> (Accessed: 11 September 2021).

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arrests; the report concluded that the policing at BLM protests in 2020 was institutionally racist.¹⁵ Comparatively in India, the once-colonised State has become the coloniser. The ruling Hindu nationalist party has discriminated against Muslims since their election in 2014. Recently, the government enacted legislation aimed at specifically excluding Muslims from the other religious minorities who are able to fast-track their citizenship.¹⁶ Both States still quell the citizen's dissent.

The prevailing coloniser mentality in England & Wales and India impacts how citizens can practically protest as right-wing movements are under policed while marginalised identities face prejudicial treatment.

Under policed right-wing movements

The jurisdictions of England & Wales and India are governed by right-wing parties. It is therefore no coincidence that protesters with right-wing ideologies are granted preferential treatment.

BLM protests in England & Wales provoked violent outcry from far-right groups opposing the Black Lives Matter cause. In response, police protected far-right groups' rights to protest while stifling anti-racist protesters' rights. On 12 June 2020, Northumbria Police banned a planned BLM march intended to counter a far-right demonstration. The same police force later banned more BLM protests, citing the violent attacks perpetrated by the far-right groups against BLM protesters.¹⁷ The police acted to suppress BLM protesters' rights to protest rather than carrying out their duty to facilitate peaceful protests.

Hundreds of thousands of farmers in India (including my relatives) peacefully protested against three agricultural laws since they were passed in September 2020.¹⁸ These laws remove the minimum

¹⁵ Elliott-Cooper, A (2021) *A Netpol report on the policing of the BLM protests in Britain's towns and cities in 2020*, Available at: <https://secureservercdn.net/50.62.198.70/561.6fe.myftpupload.com/wp-content/uploads/2020/11/Britain-is-not-innocent-web-version.pdf> (Accessed: 26 August 2021).

¹⁶ Human Rights Watch (2020) "Shoot the Traitors" Discrimination against Muslims under India's new citizenship policy, Available at: <https://www.hrw.org/report/2020/04/09/shoot-traitors/discrimination-against-muslims-under-indias-new-citizenship-policy> (Accessed: 26 August 2021).

¹⁷ Note 12

¹⁸ Farmers Produce Trade and Commerce (Promotion & Facilitation) Ordinance 2020, The Farmers (Empowerment & Protection) Assurance and Farm Service Ordinance 2020 and The Essential Commodities (Amendment) Ordinance 2020

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support price on agricultural produce, which leaves farmers at the mercy of market forces. When a pro-government news anchor was arrested at the protests, the ruling political party came to the journalist's defence. However, when other journalists reported on claims that protesters died from gunshot wounds, presumably inflicted by police, they faced criminal charges. Pro-government media coverage at protests is protected while other reports are punished.¹⁹

Prejudice against marginalised identities

In both jurisdictions, protesters from marginalised groups, particularly with intersectional disadvantage, face prejudice. Intersectional disadvantage is when a person's identity overlaps socially oppressed categorisations e.g. gender, sexuality, race.

A Trans Rights Collective UK protest was cancelled as the Metropolitan Police threatened the organisers with fines and arrest for breaching coronavirus regulations if they continued the protest. Around the same time, Extinction Rebellion (who are regarded as 'too white, too middle class'²⁰) organised protests which were allowed to proceed with conditions attached. Liberty rightly highlights this discrimination: 'Time and again it is the most marginalised who bear the brunt of overzealous policing – making it even more important that their voices are heard.'²¹

Similarly, police in India were biased against LGBTQ protesters at Kiss of Love protests in 2014. The protests intended to gather same-sex couples to kiss publically as a response to the harassment faced by homosexual students. Rather than protect the citizens' right to assemble peaceably, the police sided with the harassers, who belonged to the Hindu mainstream.²² Change is afoot but it is

¹⁹ Ellis-Peterson, H (2021) Indian journalists face criminal charges over police shooting report Available at: <https://www.theguardian.com/world/2021/feb/01/indian-journalists-face-criminal-charges-over-police-shooting-reports#:~:text=Indian%20journalists%20face%20criminal%20charges%20over%20police%20shooting%20reports,-This%20article%20is&text=At%20least%20nine%20senior%20Indian,claiming%20no%20shots%20were%20fired> Accessed (11 September 2021).

²⁰ Lewis, A (2019) *Too white, too middle class and lacking in empathy, Extinction Rebellion has a race problem, critics say*, Available at: <https://edition.cnn.com/2019/11/24/uk/extinction-rebellion-environment-diversity-gbr-intl/index.html> (Accessed: 26 August 2021).

²¹ Liberty (2020) *Liberty challenges police on cancelled trans rights protest*, Available at: <https://www.libertyhumanrights.org.uk/issue/liberty-challenges-police-on-cancelled-trans-rights-protest/> (Accessed: 26 August 2021).

²² Padanna, A (2014) India police oppose Kerala 'kiss of love' protest, Available at: <https://www.bbc.co.uk/news/world-asia-india-29814763> (Accessed: 26 August 2021).

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slow. In June 2021 a High Court judge ruled in favour of a lesbian couple while acknowledging that he personally belongs to an Indian majority 'yet to comprehend homosexuality completely'.²³

Directive #2 - Protect the oppressed

Sikh jurisprudence encourages the protection of the oppressed. The Kirpan is a physical illustration of the Sikh's commitment to protecting the vulnerable. The Guru Granth Sahib states that 'to deprive others of their rights ought to be avoided as scrupulously as the Muslims avoid the pork and the Hindus consider beef a taboo'.²⁴ Additionally, the Gurus rejected the caste system as contrary to social equality and justice. In modern times, intersectionality has been viewed as the 'new caste system'.²⁵ If the caste system were a social determinant for British Indians today, I could not even dream of practising as a barrister.

To protect the oppressed in practice, England & Wales and India must first acknowledge that certain identities and causes are more disadvantaged than others. Acknowledging oppression leads to understanding the action required to improve outcomes for disadvantaged groups. But this requires willingness; this seems unlikely as both States carry their colonial histories into the present by still oppressing their marginalised citizens.

(C) State Policing

Both England & Wales and India view protesters as pests (albeit, certain identities and causes more than others). However in India, the severity of force used by police on protesters is far more brutal than in England & Wales.

Protesters viewed as pests

In England & Wales the Police, Crime, Sentencing and Courts Bill proposes to increase police powers during protests. The Bill places far too much emphasis on managing protests rather than facilitating

²³Varadhan, S (2021) *Indian court calls for sweeping reforms to respect LGBT rights*, Available at: <https://www.reuters.com/world/india/indian-court-calls-sweeping-reforms-respect-lgbt-rights-2021-06-07/> (Accessed: 26 August 2021)

²⁴Adi Granth, 1

²⁵Coaston, J (2019) *The intersectionality wars*, Available at: <https://www.vox.com/the-highlight/2019/5/20/18542843/intersectionality-conservatism-law-race-gender-discrimination> (Accessed: 26 August 2021).

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them.²⁶ If enacted, this would intensify the coloniser mentality which at present, even affects independent legal observers at protests. Despite wearing high visibility jackets marked “Legal Observer”, four legal observers from Black Protest Legal Support²⁷ (3 of whom were people of colour) were still arrested, told to expect fines and two were even taken into police custody. If the police properly considered their duty to facilitate peaceful protests, legal observers would be seen as helpful in upholding protesters’ legal rights and protesters would not be viewed as pests.

In India, farmers’ rights protesters in Delhi have been greeted with water cannons, tear gas, and batons. The State also blocked internet access in at least 14 of 22 districts in Haryana state. The blackouts were said to be ‘in the interest of maintaining public safety and averting public emergency’ by the Ministry of Home Affairs.²⁸ It is entirely disproportionate to shut down a means of communication and accessing information to maintain public safety. The Punjab chief minister prudently remarked, ‘It’s a sad irony that on Constitution Day 2020, the constitutional right of farmers is being oppressed in this manner’.²⁹ The State and police evidently view these protesters as a blight on society.

Severity of force used by police

England & Wales and India differ in the level of force used by the police to manage protests. In England & Wales, police will kettle protesters by surrounding them in a particular area until the police decide to unbarricade the kettle. Kettling is used to contain protesters if police believe it necessary to prevent disorder and protect public safety. Rather, kettles compromise public safety as they do not distinguish between people who are vulnerable, uninvolved or members of the press. *Austin & Others v The United Kingdom* [2012] ECHR 459 held that kettling should not be used to ‘directly or indirectly

²⁶Brown, J & Mead, D (2021) *Police powers: protest*, Available at:

<https://researchbriefings.files.parliament.uk/documents/SN05013/SN05013.pdf> (Accessed: 26 August 2021).

²⁷Liberty (2021) *Liberty files legal action over protest arrests*, Available at:

<https://www.libertyhumanrights.org.uk/issue/liberty-files-legal-action-over-protest-arrests/> (Accessed: 26 August 2021).

²⁸Mitra, E & Hollingsworth, J (2021) *India cuts internet around New Delhi as protesting farmers clash with police*, Available at: <https://edition.cnn.com/2021/02/01/asia/india-internet-cut-farmers-intl-hnk/index.html> (Accessed: 26 August 2021).

²⁹Scroll.in (2020) *‘Sad irony on Constitution Day’: Opposition criticises use of water cannons, tear gas on farmers*, Available at:

<https://scroll.in/latest/979538/sad-irony-on-constitution-day-opposition-criticises-use-of-water-cannons-tear-gas-on-farmers> (Accessed: 26 August 2021).

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stifle or discourage protest'.³⁰ It is hard to imagine how a six-hour police kettle at a recent BLM protest where 'women were going to the toilet in the corner, and [other] women were forming a protective cover to give them some privacy' does not discourage protest.³¹ The hope is that the lawfulness of this kettle is challenged - but it might not be and the police would not be held accountable.

In stark contrast, the policing of protests in India involves deadly force. Human Rights Watch condemned the unnecessary lethal force used by police in India to dispel protests against the Citizenship (Amendment) Act passed in December 2019. These protests killed at least 25 people in the Uttar Pradesh state, including an 8-year-old boy.³² Uttar Pradesh police claim that people died from locally made weapons and crossfire among protesters. While they maintained that police only fired rubber bullets and teargas shells, video footage later showed a police officer firing his revolver toward protesters. This should never be a State response. India at the very least ought to comply with the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.³³ It is undeniable that protesting in India carries a far greater risk to life than in England & Wales.

Directive #3 - Fight against injustice

Sikh history demonstrates that injustice must be confronted, irrespective of the consequences. Moreover, Bhagat Kabir strongly condemns tyranny and the use of force: 'Whosoever wrongs another by force, he has to answer for it before his God, and be struck in the face'.³⁴ Also, the fifth Guru writes 'Whoever over the humble and the meek vows to tyrannize, the Supreme Lord in flames burns him.'³⁵ It is clear then, that vital to Sikh jurisprudence is the fight against injustice. In practice, the role of the courts must be reaffirmed as an independent arbiter of police and State actions. It may be impossible

³⁰*Austin and another v Commissioner of Police of the Metropolis* [2007] EWCA Civ 989

³¹Andersson, J (2020) BLM protests: London demonstrators 'were kettled, photographed and had names taken by police', Available at: <https://inews.co.uk/news/black-lives-matter-protesters-kettled-photographed-and-names-taken-by-police-440373> (Accessed: 26 August 2021).

³² The Wire, These Are the 25 People Killed During Anti-Citizenship Amendment Act Protests. Available at: <https://thewire.in/rights/anti-caa-protest-deaths> (Accessed 11 September 2021).

³³Human Rights Watch (2019) *India: Deadly force used against protesters*, Available at: <https://www.hrw.org/news/2019/12/23/india-deadly-force-used-against-protesters> (Accessed: 26 August 2021).

³⁴Singh, K (2021) *Political philosophy of the Sikh Gurus: Concept of Justice*, Available at: <https://www.allaboutsikhs.com/sikh-literature/books-kjs/political-philosophy-of-the-sikh-gurus-concept-of-justice/> (Accessed: 26 August 2021).

³⁵Adi Granth, 199

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to completely eradicate political influence but it is certainly possible to mitigate this effect, so that citizens can exercise their rights to protest granted by the State without brutal punishment.

Conclusion

The rights to protest in England & Wales and India have more similarities than differences. Both legal frameworks offer qualified rights to protest, which confer a broad discretion on the right-wing governments to discriminately apply legislative restrictions. The genesis of the rights to protest and subsequent Covid-19 legislation is different in each jurisdiction. However, the practical expression of the rights to protest are analogous. The coloniser mentalities common to both England & Wales and India result in underpoliced right-wing movements and prejudice towards marginalised groups. The most significant difference between jurisdictions is the state policing of protests. Even though both jurisdictions view certain protesters as pests, India's police response is far more life-threatening than England & Wales.

Protesting is nothing new to Sikh jurisprudence; this is why the three moral directives to (1) treat all people as equal, (2) protect the oppressed and (3) fight against injustice can markedly improve the rights to protest for the citizen, association and State. Introducing additional guidance to supplement existing legislation can safeguard citizens against the arbitrary application of vaguely worded restrictions. This would protect marginalised identities against oppression and provide another mechanism to hold the State and police accountable. Also, upholding the courts' independence would provide an independent means, free from political influence, to hold the State responsible. As the world becomes more divided, we greatly need Sikh jurisprudence because ultimately, *ੴ ਸਤਿ ਗੁਰ ਪ੍ਰਸਾਦਿ (the creator and the creation are one)*.³⁶

Word Count: 3131

³⁶ Ek Ong Kar Sat Gur Prasad - 'the creator and the creation are one. All is a blessing of the one creator. This realisation comes through Guru's Grace'.