Content Analysis of Press Framing of the Karnataka Hijab Ban and the Decisions Presented by the High Court of Karnataka about the Karnataka Hijab Row (2022) Ban

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A thesis is submitted in partial fulfilment of the requirement of the degree of Bachelor of Honours in Politics and International Relation, the University of Auckland, 2021.
Abstract
The Karnataka Hijab (Ban) Row was announced when a school in Udupi in December 2021 prohibited female students from entering the school premises while wearing a Hijab. And tensions arose when the government also stated that religious clothing disturbs the state's peace. This research aims to show the media framing of the Karnataka Hijab ban and to see any discrepancies that may be prevalent while the media reported on the decisions that the High Court of Karnataka declared when upholding the ban. The research examines how the ‘Karnataka Hijab (Ban) Row has been framed amongst the press media. It focuses on three newspapers, Zee News, The Times of India and Economic Times which are popular newspapers and are read around all of India. The press media explicitly shows two major frames: the us-versus-them frame, and the blame frame. Furthermore, the thesis also aims to examine the decisions that are prevalent amongst the media to see any potential discrepancies. Additionally, similarities and differences are also discussed amongst the three mediums and what explains them. Some of the similarities include portraying the female students as criminals for wearing the Hijab, failing to acknowledge the causes of why the issue occurred, and the consequences the High Court decision will have on the female students and their families. In which they would need to choose between their religion or go to school. Furthermore, there are discrepancies amongst the High Court decisions that are discussed where the most popular and talked about decisions are mentioned and the others are ignored completely. There are also differences. One of them being that the three mediums had a diverse range of publications on the Karnataka Hijab Ban where ‘The Times of India reported on the issue the most, and Zee News did the least. Overall there are significant differences and similarities regarding the reporting on the Karnataka Hijab ban, which shows how the media can regard and disregard information when reporting on issues of public interest.
Dedication
This Thesis is dedicated to my family and friends who have helped me on this journey of pursuing my Masters degree. And supported me through this process and encouraged me during the times when things were tough.
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Glossary

Allah hu Akbar – It has a phrase that means “God is the Greatest” and is used by the 1 Billion Muslims around the world who follow the religion of Islam.

Betō Bachao, Beti Padho – This phrase is translated into ‘Save a Girl Child, Educate the Girl Child’. This is a campaign started by Narendra Modi to help end sexism against girls. As historically within conservative households the issue has been that boys have been the proffered due to the illusion that he would carry the legacy. This resulted in girls neglected. And if a female was born she would be killed by the immediate family.

Bindi – Usually a red dot worn by women belonging to the Hindu, Jain, and Buddhist religion.

Cross – The Cross known as the ‘Christian Cross’ is the main religious symbol in Christianity.

Hijab – A headscarf worn my some Muslim women in the public and Infront of men that are not directly related to those women such as a brother-in-law, and her Uncle. This is also a sign of modesty.

India – A country located in the South Asia. Neighbouring countries include Pakistan, China, Sri Lanka, Nepal, and Myanmar.

Karnataka – A state located within South of India that has recently restricted female students from entering Government run schools if they wear the Hijab.

Niqab – ‘The niqab is a form of a veil for the face that leaves the area around the eyes clear and visible.’

Quran – The Quran is considered the central text within Islam.

Turban/Dastar – A turban also known as a Daster is worn by Sikh s as it is considered respectful to keep their head and hair covered.

Burqa – It is a long gown from head to toe that fully covers one’s body and face complexly. It is usually the colour black.

Dikhat – A situation that usually is causing an issue or a problem for an individual or a group. This can range from various different issues such as personal, social, or group problems.

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1 BBC, “What’s the difference between a hijab, niqab and Burqa.”
Chapter 1 - Introduction

**Introduction**

This research thesis will be focusing on the ‘Karnataka Hijab Row (Ban)’ that was recently announced by the Karnataka State Government prohibiting female students from wearing the Hijab within the educational institutions. My research will compare the print media’s coverage to the Court’s decision to see and explain any discrepancies. Additionally, I will compare and contrast (similarities/differences) the way in which the different print media framed the decision and to suggest reasons why the decision is framed in the way it is. The importance of looking at the overall decision and the press media framing is to show the reality of the decision, what the media reports have shown, and how the decisions have been framed. This is to see any potential discrepancies between the actual decisions and the reporting within the press. I will be focusing on the State High Court’s Decision in the case and arguments made by the Counsel, and how the print media has framed and covered the Court’s decision and to see and explain any discrepancies. I will also compare and contrast how different print media sources have framed the decision. As different media sources have their own agenda set on what they publish and ignore when covering issues such as the ‘Karnataka Hijab Row (Ban)’ Scheufele and Tewksbury see “framing as a way in which issues within news reports can have an influence on how they are understood.” Similarly, Nelson, Clawson and Oxley state “framing can exert appreciable influence on citizens’ perceptions on the issue.” Framing of an issue in general amongst the media can have a significant impact on the citizens and how they perceive the issue. But it is important to acknowledge that every individual has their own definition of what is acceptable and unacceptable. Interpretation of the decisions made by the High Court amongst the press media can be covered and interpreted in the ways which the press media sees fit and in accordance with their own agenda. Framing can be defined as “...a process of culling a few elements of perceived reality and assembling a narrative that highlights connection...to promote a particular interpretation.” Ultimately framing is about promoting a particular interpretation of the issue that is done through the individuals who run the press media such as the various stakeholders and the elites.

My research will be about how the print media has framed the Karnataka Hijab ban decision against the reality of the decision. And what explains the similarities and the differences present in the different print media newspapers.

As a consequence of the High Court of Karnataka upholding the Hijab Ban ‘a plea has been filed to the Supreme Court to challenge the decision of the High Court of Karnataka order which had dismissed a number of pleas which challenged the ban on the Hijab within the educational institutions.’ The petition has been filed by “...Muslim student named Niba Naaz through Advocate-on-record Anaa Tanwir.” The petition was filed to the Supreme Court citing the matter to be urgently heard as the national exams annually occur in April but the Court has strictly refused to fast track the hearing of the case. As the Chief Justice of India

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4Entman, “Framing: Media in the distribution of power.” 164.
5Raj, “Hijab Row: ‘No religious symbols allowed for students until final order’, says Karnataka High Court,” 1.
6Raj, “Hijab Row: ‘No religious symbols allowed for students until final order’, says Karnataka High Court,” 1.
N.V. stated, “this has nothing to do with the exams...don’t sensationalise.” The Chief Justice has stated that the civil society is sensationalising the issue and the overarching issue has nothing to do with education and the upcoming exams. If the ban was to be upheld by the Supreme Court of India, then it would ultimately set a precedent for the whole of India. Although the female students can still enter their educational institutions, they would need to refrain from showing their true identity in order to progress further into their education. The banning of the Hijab in educational institutions is opposite to what was practiced in Nazi Germany to the Jewish Population. In “Nazi-Germany occupied Europe Jews were being forced to wear a badge in the form of a yellow star as a means of identification.” “The star was intended to humiliate Jews and mark them out of segregation and discrimination.” The relevance of this example is amongst the commonality of law and clothing. As legislation was passed to ban the Hijab (a form of clothing) amongst female students. As Karnataka’s law is mandating the donning of the Hijab was illegal and no permissible whilst historically, in Nazi Germany it was mandated to use the yellow start to mark the identification of who is a Jew and to segregate/dehumanise them from the rest of population. In India the Muslim population is second highest after Hindu population. As the Muslim population within India is “195,000,000” rounding up to 2 million Muslims who consider India their home. Additionally, this makes up “10.90” of the world’s population who reside in various different states and territories within India. Furthermore, the population of which individuals follow the religion of Islam in India is “14.2%” and this makes up the second highest religious group. As “Hindus make up 79.8% of India’s population...Christians, Sikhs, Buddhists and Jains account for...the remaining 6%.” These statistics show that a significant portion of Muslims reside in India and practice the religion of Islam.

Decision Making Process of a High Court
Within India, High Courts have a specific process on how they make decisions upon the cases that are heard. “India has a common law system that means there is flexibility in interpreting the law by the different courts.” This is “due to differences in interpretation of rules and procedures, and administrative control of different courts.” Within Article 141 it states that: ‘the law that is declared is binding on all the lower courts within the state of India.’ Overarchingly, the Supreme Court sets the precedent that the lower courts such as Tribunals, District Courts, and High Courts are supposed to follow. Within a High Court in India, it has four main processes of decision making. Firstly, “every High Court has a Registry that is headed by a Register.” A petition is to be filed by “all plaints, petitions, applications, memorandum of appeal shall be presented by the plaintiff.”

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7Express News Service, “Don’t sensationalise’: Supreme Court nixes urgent hearing of plea against Karnataka HC hijab ban.”
12Pew Research Centre, “Key findings about the religious composition of India.”
13Pew Research Centre, “Key findings about the religious composition of India.”
16Kavuri, “Introduction to the Indian Judicial System.”
17Ipleaders, “High Court procedures and practice in India.”
18Ipleaders, “High Court procedures and practice in India.”
The plaintiff (who makes the complaint against someone) presents the documents to the register in order for the case to be heard by the High Court. Once no issues are found the "register makes the registration…and prepares the list of cases for the hearing."\(^\text{19}\) Secondly, a “writ summon is issued to the opposite side to appear and file a response to the application…filed against them.”\(^\text{20}\) According to the ‘Constitution of India’ Article 226 notes “…every High Court shall have power, throughout territories in relation to which it exercises jurisdiction to issue to any person or authority, any Government…directions, orders or writs…”\(^\text{21}\) Ultimately, this means that the High Courts within India have the power to issue writ of summons to any individual and government officials concerned within a state in India.

Thirdly, a pre-admission ‘hearing is one where the party filing presents arguments convincing the court that the case has merits and is justified for the remedy they are seeking.’\(^\text{22}\) Fourthly, once pre-admission has been heard and the case is accepted into the High Court normal hearing commences. This means the court ‘examines the written arguments by both the parties in regard to the case and a written reply is filed by the opposite part in regard to the case.’\(^\text{23}\) Lastly, ‘upon the final hearing the parties concerned make their final arguments on the concerned issue using supportive evidence and judicial precedents.’\(^\text{24}\) Once the final hearing “the court rarely gives its decision (i.e. the judgement) at the end of the hearing. Rather the decision is “reserved” and presented sometime after the hearing.”\(^\text{25}\) ‘Every presiding Judge that hears the case makes their own decision on the issue and when the decision is unanimous, the decision of the majority triumphs.’\(^\text{26}\) Overall, the High Court procedure and process of hearing a case is always concerned with the supreme law of the ‘Constitution of India’ that requires research and evidence to determine the right outcome and for the concerned Judges to make the right decision.

**Research Question**

The Karnataka Hijab Row (Ban) is a recent issue that has occurred in December 2021 which is about female students’ right to wear the Hijab within their Educational Institutions, and their right to express themselves freely without restriction. Moreover, the Karnataka Hijab ban is my chosen case study for my research because minority rights continue to be at risk. Due to these reasons, I will be looking at how the Karnataka High Court’s decision regarding the Hijab ban has been reported and framed in the print media? And how is the framing between the print press framing compared to the overall decision? And what explains the overall significance amongst the decision and the framing of the decision amongst the print press? It would be interesting to compare the print media’s coverage of the decision to the Court’s decision and see any discrepancies. Recently, in March of 2022 the High Court of Karnataka upheld the Hijab ban.

**Hypotheses**

To hypothesise, I have four main hypotheses:

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\(^{19}\)Ipleaders, “High Court procedures and practice in India.”

\(^{20}\)Ipleaders, “High Court procedures and practice in India.”


\(^{22}\)Ipleaders, “High Court procedures and practice in India.”

\(^{23}\)Ipleaders, “High Court procedures and practice in India.”

\(^{24}\)Ipleaders, “High Court procedures and practice in India.”

\(^{25}\)High Court of Australia, “Operations of the High Court.”

\(^{26}\)High Court of Australia, “Operations of the High Court.”
1) Firstly, I expect to find differences between the actual decision as given by the three Judge bench and the media reports regarding the decision. Furthermore, whether or not it is permissible/to legally allow female students to wear the Hijab within Government Educational Institutions. Moreover, I expect the three chosen outlets to report on aspects that relate to their overall agenda and the aspects of the issue that appeal to their stakeholders and audiences. I also expect the argument of whether the Hijab is a religious or a cultural practice to be discussed within the Judgement with Quranic verses being used to justify the Judges position on this issue.

2) Secondly, I expect the legal decision to be presented by the court to be based on the Constitution of India and cite Section 133 subsection 2 of the “The Karnataka Education Act 1893.” Section 133 (2) states “The State Government may give such directions to any educational institution or tutorial institution as in its opinion are necessary to expedient for carrying out the purpose of this Act…as the case may be, of such institution shall comply with every such direction.” This subsection gives powers to the State Government to give provisions and directions without any restriction and the institutions are obliged to comply with the directions issued by the State Government. It is important to note that the Constitution is always up for interpretation and in most cases the Judiciary is the institution that interprets the Constitution. The relevant provisions of the Constitution are expected to be discussed:
   - Section 25 of the Constitution states every individual “subject to public order, morality and health, and to the other provisions of this part, all persons are entitled to freedom of conscience and the right freely to profess, practice and propagate religion.”
   - Section 26 states every individual has “subject to public order, morality and health, every religious denomination or any section thereof shall have the right – (a) “to establish and maintain institutions for religious and charitable purposes.”
   - (b) “to manage its own affairs in matters of religion.”

The above two sections and subsections of the Constitution of India I expect to be prevalent in the overall decision of the case on whether or not the Hijab should be allowed to be worn by the female students when attending Government run educational institutions.

3) Thirdly, I expect the legal reasoning given by the High Court of Karnataka to strike down arguments of petitioners who cited the Constitution of India, Right to Education, and the right to express/dress however they like. The Constitutional Dilemma is expected to be heard but cannot be solved as the High Court is only permitted to hear claims regarding the Constitution, but it is not allowed to formally amend or give any formal decisions in regard to Constitutional disputes. Contrastingly, I expect discrepancies amongst different print media sources and expect them to focus on a different angle of decision rather than taking a holistic view of the decision.

Table 1 - Describing the three-hypothesis predicted to be seen in this research.

Overall, the above three hypotheses I expect to see in the overall judgement of the case (presented by the three-judge bench) and reality of the decision amongst the media reports.

**International Context of the Karnataka Hijab Ban**

In India, the state of Karnataka’s Hijab ban has followed some of the most famous nations in banning the hijab. One of the first nations to ban the Hijab was France.

**France**

The French Hijab ban has been a catalyst for many European nations to adopt a similar policy which restricts female students from wearing the Hijab in the public eye in various different facets of the public sphere. Historically, France has been a secular state that separates Church from State. This sets the fundamental principle that the Church cannot get involved in matters which involve the state. In 1905, the Third Republic adopted a law on church-state relations. “The Law of 9 December 1905 concerned the separation of the church and state.” This law known as the ‘Law of Separation was a reflection of strong anti-clericism and a rejection of the claim that religion had domination over the Political aspect of the state.” Under this law the first two articles set out the premises of the separation of state and religion. Article 1 states “The Republic ensures liberty of conscience. It guarantees the free exercise of religion, under restrictions prescribed by the interest of public order.” This article asserts that individuals are able to practise their religion freely but there are restrictions due to the interest of public order and safety. Article 2 of the Law states “The Republic does not recognise, remunerate, or subsidize any religious denomination.” This means that France as a nation stays neutral, does not pay for work to be done on places of worship for any religious denomination. In 2004, France took their first step in banning the Hijab for school students in public schools. As the law known as “Loi encadrant, en application du principe de laïcité, le port de signes ou de tenues manifestant une appartenance religieuse dans les écoles, collèges et lycées publics.” On February 10, 2004 the French National Assembly voted on the law after twenty one hours of debate in which 494 individuals voted for the law while 36 voted against the law. Officially ‘the law became legislation and was passed by the Senate by 276 to 20 and was promulgated on March 21, 2004.’ The overarching point of this law is ‘that it restricts students of public primary schools, secondary schools, and lycées from wearing religious symbols and clothing that displays their religious affiliations.” The ban includes the Hijab, Christian cross that excludes a certain size, and Turbans/Dastar.

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34 McGoldrick, 35.
35 McGoldrick, 35.
38 McGoldrick, 90.
39 McGoldrick, 90.
40 McGoldrick, 90.
41 International Center for Advocates Against Discrimination, *When Discrimination Masquerades as Equality: The Impact of France’s Ban of Religious Attire in Public Schools*, 1
France further passed a legislation to ban the Hijab/Niqab on ‘April 11, 2011,’ for this ban it is prohibited for women to veil themselves in public places. Simply, the law stated, ‘no one within the public space should wear any form of articles of clothing that is intended to hide (conceal) one’s face.’ Furthermore, the law made it a ‘criminal offence to wear any form of clothing that covers the face in the public sphere and is punishable by a fine of up to 150€.’ This is approximately $250 New Zealand Dollars. If women are seen to be wearing any form of face covering ‘they may be asked to pay the fine or asked to complete a citizenship course.’ Additionally, ‘the law also states to rightly criminalise any individual who coerces someone into covering their face and it is punishable by up to a year in prison and a 30,000€ (approximately $50,000 New Zealand Dollars).’ If a minor is coerced/forced to cover their face then it is a 60,000€ fine or two years in prison.’ The purpose of introducing and passing this law was because of the terrorist acts that has occurred in France and due to the security threat presented. Therefore, France found it necessary to prevent any form of face that is worn to be illegal.

Due to the 2011 legislation that was enacted a case titled “S.A.S v. France” was brought ‘to the European Court of Human Rights (located in Strasbourg, France) by a female aged 24 who found that the general ban that was enacted in 2011 was a violation of her rights and freedom of expression.’ The Plaintiff argued in the court that “the law is discriminatory on the basis of both gender and religion, violates her rights to freedom of expression, religion or belief and private life…” Furthermore, S.A.S alleged that “the refusal to permit her to wear the niqab in public amounted to violation of Article 3, the right to be free from inhuman degrading treatment.” Comparatively, the French Government arguments ‘had two main arguments of public safety and the respect for the minimum set of values of an open and democratic society.’ The European Court of Human Rights decided to ‘uphold the points made by the French Government in defending the ban’ and it was determined the ban was deemed legal.

**Other Nations that have followed France and have banned the Hijab/Niqab**

Post France’s ban, multiple nations have followed in their footsteps to ban the Niqab and the Hijab from being worn in public on both a macro and micro level within various different public spaces. Nations include Germany, Austria, Belgium, Netherlands, Italy (in a small town), Denmark, Russia, Switzerland, and Bulgaria. All these nations have cited vastly

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42 BBC, “The Islamic Veil Across Europe.”
49 Amnesty International, “European Court ruling on full-face veils punishes women for expressing their beliefs.
50 Amnesty International, “European Court ruling on full-face veils punishes women for expressing their beliefs.
similar reasoning such as security and public safety of the citizens. The Indian state of Karnataka (South India) is the first state to ban the Hijab within Government run public schools in March 2021 when the High Court of Karnataka deemed it legal for the Hijab to be banned. There was a case brought by 6 petitioners vs the Karnataka Government in which the High Court heard the petitions by the Muslim students. But overall, on March 15, the Karnataka High Court upheld the ban and possibly disrupted the education of many Muslim girls because of the ban who have to choose between their education and their religion.

**Political Context of India’s Ban**

India is currently run by the BJP party known as the “Bhartiya Janata Party (BJP)...is a pro-Hindu political party of post-independence India.”  

The party came into power in India in the year of 2014 and currently the party rules “12 states” including Karnataka. Karnataka’s current CM named “Basavaraj Bommai” belongs to the BJP (Bhartiya Janata Party). The party “advocates the ideology of Hindutva…which insists that multireligious and multi-ethnic is fundamentally a Hindu Rashtra (Hindu Nation).”  

This means that the multi-religious nation India is a Hindu nation. Overarchingly, the party’s ideology ignores the multiculturalism and multi religious country India is known for internationally and amongst the western nations. One of the main campaigns that was launched in ‘2015 by the Indian Government was the Beti Bachao, Beti Padhao (save the girl child, educate the girl child).”  

The purpose of this campaign was to “educate citizens against gender biases and improve efficiency of welfare services for girls.” Furthermore, the campaign had five main objective; “improve the child sex ratio, ensure gender equality and women empowerment, prevent gender-biased/sex selective elimination, ensure survival and protection of a girl child, and encourage education and participation of the girl child.”  

The context of introducing this campaign was due to the history of female children being killed by the family for simply being a daughter. Within India it was common for abortion to occur such as if the family’s unborn child was a girl and the parents due to cultural or for other reasons preferred a boy, “the foetus is defective, the foetus did not suit the parents…” Due to this ongoing issue the “Pre-Conception & Pre-Natal Diagnostic Techniques Act, 1994” was introduced. This legislation prohibits “...sex selection, before or after conception, and for regulation of pre-natal techniques for the purposes of detecting genetic abnormalities...of the misuse for sex determination leading to female foeticide...”  

Overarchingly, it is illegal in India for parents to find out the sex of their child due to the historical issue of female foeticide. Some parents do go to the extent of killing or burying their child if they find out it is a daughter. “The cultural preference to the highest in 17 states in the north of the country, with the…state of Uttar Pradesh showing the highest deficit in female birth.”  

Due to the ongoing discrimination between boys and girls the initiative of Beti Bachao, Beti Padhao was

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54 Britannica, “Bharatiya Janata Party - political party, India.”  
55 Maps of India, “Ruling Parties in Different States of India.”  
56 One India, “List of Chief Ministers of Karnataka & Their Tenure Period.”  
57 Al Jazeera, “What you need to know about India’s BJP.”  
58 India Brand Equity Foundation, “Beti Bachao, Beti Padhao.”  
59 India Brand Equity Foundation, “Beti Bachao, Beti Padhao.”  
60 India Brand Equity Foundation, “Beti Bachao, Beti Padhao.”  
61 BCC, “Ethics Guide - Selective Abortion.”  
64 Dhillon, “Selective Abortion in India could lead to 6.8m fewer girls being born in 2030.”
introduced to decrease female foeticide and to encourage female students to complete their education.

The Karnataka Hijab ban which was upheld by the Karnataka High Court contradicts this campaign as female students are being forced to choose between their education and their religious expression. Moreover, the state of Karnataka is ruled by the BJP supports the ban, but it also contradicts their own campaign of “Beti Bachao, Beti Padhao” whose main purpose was to protect and save the female child but also give opportunities to female students to get good quality education and give them equal opportunities to get an education. Additionally, restricting girls who wear the Hijab from entering the school grounds strictly goes against the objective of ‘encouraging education and participation of the girl child.’

The BJP (Bhartiya Janata Party) party rules various different states that has given the party leverage to mandate it to be the ruling party of India. This has ultimately given the party to introduce various different legislations and paved way for various legislations and statements that impede and target minority rights of various different minority religious groups. Moreover, the BJP party rules various different states that has given the party the mandate to be the ruling party of India. BJP presently rules the states of UP (Uttar Pradesh), Karnataka, MP (Madhya Pradesh), and Uttarakhand. During the BJP’s reign they have targeted minorities by introducing legislations that target minority groups for their identity, religion and states that have continued to use their ideologies to continuously target minorities and their cultural practices.

Firstly, in December 2019, the BJP Government passed the “Citizenship Amendment Act 2019.” This legislation stipulated making ‘religion the basis for obtaining citizenship for the first time in centuries.’ As the new law ‘makes it quicker for asylum claims of immigrants from the neighbouring Muslims-majority countries but it excludes individuals who identify as Muslims.’ This law made gaining citizenship tough for Muslims and only Sikhs, Janis, Christians and Hindus were allowed to gain citizenship in India. This resulted in a mass protest where arrests were made of critics and protesters.

Secondly, in ‘December 2021, the Hindu nationalists in which many of them have links to BJP had held a three-day conference in Uttarakhand (Northern India) where speakers had openly called to kill Muslims.’ Additionally, ‘within the Haryana state, the BJP Chief Minister supposed the Hindu vigilantes and demanded that Muslim prayers in the public sphere should be stopped.’ Lastly, “December 2021 the BJP Government announced three Farm Laws which targeted the agricultural sector where there were arguments to monopolise the system to make it electronic and remove MSP (Minimum Support Price).” The state of Punjab is one of few states that is known for their Agriculture and the Sikhs are the largest

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65India Brand Equity Foundation, “Beti Bachao, Beti Padhao.”
66Bhat, “Explainer: Why India’s new citizenship plans are stirring protests.”
69Bajoria, “Hijab Ban in India Sparks Outrage, Protest - Standoff Points to Growing Marginlization of Muslims.”
70Bajoria, “Hijab Ban in India Sparks Outrage, Protest - Standoff Points to Growing Marginlization of Muslims.”
71Sethi, “One year later reflections on the farmers' protest in India.”
population in Punjab who are heavily involved in agriculture. By targeting the agricultural sector, the Sikhs were also targeted who work daily to meet their needs to provide for their family.

These are just a few of the examples where Muslims and Sikhs have been targeted indirectly through policies that impede both their personal lives and their professional lives. The above two examples show minority religious groups being targeted which impacts different facets of their lives. This is done by introducing policies which restrict students from entering their educational institutions and by impacting their livelihoods through the farm laws. The BJP continues to impede on minorities rights by passing legislation that may impact their lives on a personal and professional level. Such as by stepping on other individuals' religious minorities by introducing policies that impact the lives of many.

**Importance/Why this Study Matters**

The Karnataka Hijab Ban is an issue that has arisen recently in early December and the tension continued to arise post the unanimous decision that was upheld by the Karnataka High Court. The decision stated that female students who wore the Hijab were prohibited from entering their educational institutions. The study is important because the Karnataka Hijab Ban has resulted in criticism domestically by various different actors such as through Politicians, religious groups, and various celebrities who have either criticised the High Court for upholding the ban whilst others have supported the High Court in banning the Hijab. Moreover, Law Association, Islamic Non-Governmental Organisation and Sikh Gurdwara Committees have recognised the consequences of this ban particularly on minority groups around the country who wear religious symbols in the public sphere.

Previous research around social issues have encompassed scholarship that has compared social media framing with traditional media framing of the issues. This makes my research unique for two reasons. Firstly, I am going to be using the High Court’s decision in regard to the Karnataka Hijab Ban that has been reported and framed in the media. This is to see the comparison of the framing between the press compared to the overall decision. The importance of this study is that the framing of the decision amongst the press and to show potential discrepancies that may be present in the way the media portrayed the Court’s decision on a highly contested issue. Furthermore, through Political intervention the Hijab has been banned and this shows the ability of Politicians making personal decisions political. Secondly, I will be using three press media sources to see the discrepancies amongst the press in regard to reporting the decision whether to see if the media has picked on what decision they report on and what they ignore. This will show the discrepancies and the potential to see how different media pick and choose to report on different aspects of the Karnataka High Court’s decisions on the Hijab Ban. Overall, the importance of the study is to compare the decision of the court against the press media reporting of three different newspapers to see how they have reported it. Furthermore, to see the discrepancies that are prevalent in their framing and reporting of the High Court decision on the Hijab Ban.

The upcoming chapter will encompass the background of the Karnataka Hijab Ban and the decision presented on the Karnataka Hijab Ban in upholding the ban. The substantive chapter would include a literature review on the concept of framing with a focus on how judicial decisions are framed and a methodology chapter which includes defining the problem and discussing the methods used for this thesis. The chapter on the print media would encompass three print media newspapers and analyse their framing of the decision against the reality of the decision presented by the Karnataka High Court. Furthermore, potentially explain the
reasons for this, and any discrepancies between the framing and the reality of the decision within the three newspapers. The next chapter will compare and contrast (similarities/differences) the way in which the different print media framed the decision in the media, and to suggest reasons why the decision is framed in the way it is. Lastly, chapter six will showcase the overall conclusions made from my research and situate it within the current literature.

Chapter 2 - Karnataka Hijab Ban Background and High Court’s reasoning in upholding the Ban.

Karnataka Hijab Ban - The Background
The Karnataka Hijab ban, the first of its kind in a country located in South Asia, has been highlighted around the world as girls were barred from entering their education institutions if they wore the Hijab. Female students could only enter their Educational Institution if they did not wear the Hijab. The Muslim population of Karnataka, according to the 2011 Census, which was published in 2015, is “78.93 Lakh,” and Muslims constitute “12.92%” of Karnataka’s population. Muslims practising the religion of Islam make up the second-largest religion in India.

The tensions in regards, to the ‘Hijab Row’ also known as the Karnataka Hijab Ban began in December 2021 when 6 female students were asked to remove their headscarves before entering and attending their classes at a Government Pre-University College known as “…Mahatma Gandhi Memorial College…” that is ‘located in the small Karnataka district known as Udupi.’ “AH Almas, Aliya Ayesha, and Muskaan Zainab” were the first female students targeted by their Universities and institutions for wearing the Hijab. They were the first to protest when they resented against the Government Women’s PU college in Udupi, Karnataka for wearing their Hijabs.

As the six girls decided to rebel against the system the consequences of this were significant. This included three main consequences. Firstly, one of the girls named Aliya Assadi ‘had been getting abusive phone calls and her phone number, parent’s names and home address were shared on various WhatsApp groups in Karnataka.’ Furthermore, a female student named ‘Hazra Shifa, who attends the same college stated that her parents have been receiving calls from unknown phone numbers.’ By leaking phone numbers, addresses and parents’ names this is a huge breach of privacy by an educational institution. It is not only the numbers of the girls who at the forefront of rebelling against the High School but the Muslim girls who refuse to take off their Hijab have been targeted. As their private information has been leaked and have either been threatened because they have decided to speak about their human rights, rebelling against the government, and their college.

72Muslim Census, “Muslim Population in Districts of Karnataka.”
73Muslim Census, “Muslim Population in Districts of Karnataka.
75Kapur, “Karnataka high court upholds hijab ban in colleges,” 1.
76FirstPost, “Hijab Row: What Twitter timelines of Udupi students reveals about agitation in Karnataka.”
77Henry, “Karnataka Hijab Row: College Leaks Addresses, Numbers of Protesting Muslim Girls.”
78Henry, “Karnataka Hijab Row: College Leaks Addresses, Numbers of Protesting Muslim Girls.”
In February 2022, individuals and female students protested in various districts in Karnataka. In ‘Karnataka’s Kodagu district, approximately 20 students protested against the ban when the administration tried to prohibit students from wearing the Hijab and asked them to remove the headscarf before attending their classes. In ‘Karnataka’s Kodagu district, approximately 20 students protested against the ban when the administration tried to prohibit students from wearing the Hijab and asked them to remove the headscarf before attending their classes. Instead of the female students taking off their Hijab and entering the school, they decided to ‘refuse to take off their Hijab, and they walked out of the school premises and started to protest. In ‘Udupi’s Mahatma Gandhi Memorial College, there was a massive protest where female students wore Burqas and Hindu students were seen wearing saffron shawls (scarf). The students who decided to retaliate to allow them to wear their saffron shawls were “…belonging to First Grade College in Koppa, Chikmagalur…” Muslim students came to the ground with slogans of Allah hu Akbar.” Likewise, ‘the Hindu students who wore saffron shawls started to be chant Jai Shree Ram.” Additionally, the Hindu students are the same students that supported the female students to wear their Hijabs in the classroom but suddenly changed sides when the female students decided to rebel against their school. The protest was sparked because Hindus who wore saffron shawls demanded that if female students wear the Hijab in educational institutions, then Hindu students should be allowed to wear their saffron shawls in their classrooms as well. Similarly, a protest occurred at Byndoor Government PU College, where approximately 300 plus Hindu Students had worn their saffron scarves to their college.

Lastly, as a consequence of these tensions the ‘Karnataka authorities decided to shut down the schools and colleges for three days. All those “students who meant to see their peers with the naked eye of compassion, look at their peers through a dark lens of religion and caste-based divisions of the hypothetical society.” This means that those who used to see their peers through the lens of compassion now viewed their friends through a dark and negative lens. In India individuals belonging to a dominated religious group or caste tend to discriminate against those who are considered below them in terms of their identity. The overall issue highlights religious discrimination amongst peers in a safe environment of their class who are instigated to see their female peers who wear the Hijab as the ‘other’ because of their religious affiliation/attire just because they rebelled against the order of the State Government of Karnataka and their teachers.

India being a diverse state has a caste system in place which paves way of being a catalyst of discrimination. Additionally, these states have different priorities for different religious groups. As individuals who belong to a lower class tend to be discriminated on the basis of their caste and their religious identification. This ultimately highlights religious discrimination amongst peers in a safe environment of their classrooms. In which female

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79 Free Press Journal, “Education is important but hijab is most important to us: Students protest against Hijab ban in Karnataka’s Kodagu,” 1.
80 Free Press Journal, “Education is important but hijab is most important to us: Students protest against Hijab ban in Karnataka’s Kodagu,” 1.
81 Bajoria, “Hijab Ban in India Sparks Outrage, Protest - Standoff Points to Growing Marginalization of Muslims.”
82 Farhat, “Jai Shri Ram, Allah o Akbar, and India’s Dying Secularism.” 1
85 Farhat, “Jai Shri Ram, Allah o Akbar, and India’s Dying Secularism.” 2
86 Bajoria, “Hijab Ban in India Sparks Outrage, Protest - Standoff Points to Growing Marginalization of Muslims.”
students who wear the hijab are seen as the ‘other’ because suddenly those peers who saw those female students as their peers are now seen to be rebellious.

February and March are usually when exam season commences for students to sit their exams and pass to move into their next class and the following year’s level. The Karnataka Government and the Education Board decided to restrict female students into their classrooms due to their religious attire of the Hijab. An example is when a ‘female student who went to school wearing her Hijab to sit her year 10 exam was restricted from entering the school premises.’ The challenge was that many female students had to choose between their faith/religion and education.

On ‘February 8, 2022 the Karnataka High Court heard the petitions made by Muslims students who supported the right to wear the Hijab.’ Alongside the petitions various reasons were presented by the Karnataka Government and the Education Board and their justifications for banning the Hijab in the first palace. On ‘March 15, 2021 a three judge bench of the High Court of Karnataka, one whom is a Muslim woman, upheld a ban for students attending state-run educational institutions.’ The upholding of the ban had criticism not only domestically from various religious organisations, celebrities, politicians, the petitioners and law associations as they either criticised the ban for being upheld or applauded the Karnataka Hijab Court for their decision of upholding the ban. Due to the ‘ban many petitioners (female students) have filed an appeal to the Indian Supreme Court due to the judgement that was passed by the High Court of Karnataka.’ Additionally, celebrities such as Paul Pogba (International Football Player - France) and Malala Yousafzai (Nobel Peace Prize winner) have spoken against the ban.

As the High Court of Karnataka upheld the ban, the students have been prohibited from entering the school grounds, and the teachers have also had to bear the consequences. On March 30, 2022, ‘seven teachers were suspended from their jobs as they allowed hijab-clad girls to enter and attend their exams at CS Patil Girls High School located in Gadag, Karnataka.’ Furthermore, on April 4, 2022, ‘all the female teachers that wore the Hijab at their schools were free from supervising the exams.’ The overarching ban is not only impacting and depriving female students who wear the Hijab of their education. However, also, all those teachers who wear the Hijab within the school institutions are being laid off from their positions as teachers. “According to the data compiled from an online survey, in Udupi district alone over 230 female students missed exams and classes because of the hijab ban.” Overall, the Hijab ban that the High Court of Karnataka has upheld has not only impacted the students from attending their exams but also teachers who wear the Hijab and have permitted their female students to wear the Hijab to come into class.

**High Court’s reasoning in upholding the Ban.**

88Free Press Journal, “Education is important but hijab is most important to us: Students protest against Hijab ban in Karnataka’s Kodagu,” 1.
89Bajoria, “Hijab Ban in India Sparks Outrage, Protest - Standoff Points to Growing Marginlization of Muslims.”
The High Court of Karnataka whilst deciding whether the Hijab is legal or illegal to wear answered the petitioners' questions that they had raised. There were eight main arguments made by the petitioners in regards to the Hijab Ban:

- “Pleadings and Proof as to Essential Religious practice”\(^9\)
- “As to School Discipline & Uniform and Power to prescribe the same: - Question of Whether there is power to prescribe dress in education institutions.”\(^9\)
- “As to Prescription of School Uniforms to the Exclusion of Hijab Violates Articles, 14, 15, 91(1)(a) & 21.”\(^9\)
- “Conceding Hijab on the Principle of Reasonable Accommodation.”\(^9\)
- “As to validity of Government circular Date 31.1.2014 Concerning School Betterment (Development) Committees.”\(^9\)
- “As to Validity of Government Order Dated 5.02.2022 Providing for Representation of Dress Codes in Educational Institution.”\(^9\)
- “International Conventions And Emancipation of Women.”\(^\)
- “The Public Interest Litigation.”\(^\)

\(\text{Table 2 notes - the arguments made by the petitioners that the court answered to as part of the overall decision on upholding and banning the Hijab and Government run Educational Institutions.}\)

Firstly, one of the main questions asked was ‘whether wearing the Hijab is a religious practice.’\(^1\) The Apex Court in Indian Young Lawyers Association stated, “...essential to religious faith or belief; have to be adjudged on the evidence born out by record.”\(^2\) For a religious belief or practice to be considered, it must be based on evidence within a record to be considered essential. The court notes that “there is absolutely no material placed on record to prima facie show that wearing of hijab is part of an essential practice in Islam and that the petitioners have been wearing Hijab from the beginning.”\(^3\) Furthermore, it noted that ‘the hijab can merely be treated as a fundamental part of the Islamic faith.’\(^4\) Lastly, as a part of this argument the court concludes that “petitioners have miserably failed to meet the threshold requirement of pleadings and proof as to wearing the hijab is an inviolable religious practice in Islam and much less part of ‘essential religious practice’.”\(^5\)

Overall, the court declared the following:

“In view of the above discussion, we are of the considered opinion that wearing of hijab by Muslim women does not form a part of essential religious practice in Islamic faith.”\(^6\)

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\(9\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 85.
\(9\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 87.
\(9\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 95.
\(9\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
\(9\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 109.
\(10\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 113.
\(10\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 122.
\(10\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 127.
\(10\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 85.
\(10\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 86.
\(10\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 87.
\(10\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 87.
\(10\)High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 87.
The overall decision shows that the High Court of Karnataka decided that the “petitioners have miserably failed to meet the threshold requirement of pleadings and proof as to wearing hijab is an inviolable religious practice in Islam and much less part of ‘essential practice’.”

The three-Judge bench viewed that the verses within the Quran do not explicitly state that women are required to cover their hair within Islam.

Secondly, is the question of whether “as to the school discipline & Uniform and power to prescribe the same” has been asked by the petitioners. This means that the petitioners have asked the High Court of Karnataka whether or not schools have the right and the power to prescribe school uniform. The petitioners made an argument that ‘having uniforms is similar to police power and therefore, the prescription cannot occur, and it is too farfetched.’ The court views that “in civilised societies, teachers of education are treated next to parents...the authority which the teachers exercise over the students is a shared parental power.” This means that within India and amongst different states teachers play the role of parents within the school and exercise direction based on what is necessary. Ultimately, the court stated that ‘power lies in prescribing uniforms as every school/educational institution is expected to have a dress code.’ Lastly, the court cited that Section 133 (2) of the Karnataka Education Act “vests power in the government to give direction to any educational institution for carrying out the purposes of the Act or to give effect to any of the provisions of the Act or the Rules, and that the institution be it governmental, State aided, or privately managed, is bound to obey the same.” Ultimately, the High Court states that the Karnataka Education is binding on every educational institution within the state. And the government has the power to give direction and the institutions have to act in accordance with the directions given. Overall, the court declared:

“Suffice it to say now that the contention as to absence of power to prescribe dress code in school is liable to be rejected.”

The third main question that has been raised is “whether the prescription of school uniform to the exclusion of Hijab violates Articles, 14, 15, 19(1) (a), & 15.” As to answer this question the court states ‘providing students of schools with uniform is as homogeneous and serves as achieving constitutional secularism.” The petitioners argued that “regardless of their freedom of conscience and right to religion, wearing of the hijab does possess cognitive elements of ‘expression’ protected under Article 9(1)(a) vide National Services Authority.”

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109 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 87.
110 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 87.
111 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 90.
112 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 90.
113 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 93.
114 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 94.
115 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 94.
116 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 96.
117 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 97.
The petitioners have explicitly argued that wearing a hijab is important mentally and is an expression that is protected. Additionally, the Natural Legal Services Supra have stated that “dressing to is an ‘expression’ protected under article 19(1)(a) and therefore, ordinarily, no restrictions can be placed on one’s personal appearance or choice of apparel.”

Overall, the court states that they have ‘no argument with the petitioners essential proposition and what the individuals desire in regards to wearing what they want in accordance with their autonomy and for ones expressions but it should be done in reasonable regulation.” These include the public interest of the society they live in.

The fourth argument put in front by the Court by the petitioners is the question of “conceding Hijab on the principle of reasonable accommodation” This is where “the counsel of petitioners petitioned that the female students should be allowed to wear the Hijab that matches the uniform colour and in accordance with the Educational Institutions uniform.”

One of the main arguments made by the court is about the potential of creating “social separateness.” As if “there shall be two categories of girl students…those who wear uniform with hijab and those who do not.” By creating social separateness “it would ultimately disturb the uniformity in which the uniforms are made to keep uniformity.” The court has argued that “the aim of the regulation is to create a ‘safe space’ where such diverse line should have no place and ideals of egalitarianism should be readily apparent to all students alike. Adherence to dress code is mandatory for students.”

To summarise, the court stated that having uniform is to create a safe space where everyone is equal, and the students are mandatorily expected to adhere to the dress code (uniforms) prescribed by the educational institution. In regard to the question of “conceding Hijab on the principle of reasonable accommodation” the court stated:

“In the view of the above, we are of the considered opinion that the prescription of school uniform is only a reasonable restriction constitutionally permissible which the students cannot object to.”

The fifth main argument is about the “...validity of Government circular Date 31.1.2014 Concerning School Betterment (Development) Committees.” The purpose of this order was that the ‘Government ordered the constitution of the School Betterment Committee whose purpose was to secure Aid and enhance the basic facilities and optimising their

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119 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 102.
120 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 103.
121 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
122 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
123 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
124 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
125 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
126 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
127 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
128 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 109.
utilisation.” The members of the committee ‘includes student representatives, parents, teachers (educationalist), Vice Principal/Senior Professors, and a Senior Lecturer.’ The petitioners in this case argued that ‘having a committee with the presence of a local member from the Legislative Assembly would inflict Politics in the campus and it is not desired and argued that that the committee is invalid.’ To counteract this argument the court stated that “…in the past eight years…no complaint has raised about their performance…” In terms of the judgement in regards to this question they raised there has been no questions/complaints raised about the established School Betterment (Development) Committees.

The sixth question concerns the “…validity of Government Order Dated 05.02.2022 providing representation of Dress Code in Educational Institutions.” It states that ‘no prescription of uniform should be prescribed within schools but only for prescription in different educational institutions.’ There are three forms of institutions, and within those institutions, only certain agencies can prescribe uniforms as noted below:

- “In government schools as prescribed by the government.”
- “In private school as prescribed by the school management.”
- “In the Pre-University colleges that come within the Jurisdiction of the Department of the Pre-University Education as prescribed by the College Development Committee of College Supervision Committee….”
- ‘Where there is no dress code, the attire should be prescribed based on ‘equality and integrity’ and an attire that would not disrupt the ‘public order.’

One of the main questions raised by the petitioners was that the “government order has been hastily issued even when the contemplated High-Powered Committee was yet to look into the issue as to the desirability of prescription and modules of dress codes in the educational institutions.” Although the court agreed with the state, it also stated ‘that special conditions such as social unrest, public agitation, governments do take urgent decisions that do not follow a proper process and may appear to be ‘knee jerk; reactions.’ Furthermore, the court stated that ‘ultimately it was up to the Executive Branch to make decisions that are taken in the time frame and when policy content and considerations that shape a decision are not accessible to the judiciary.’

Due to the arguments made about the “validity of the Government Order Dated 05.02.2022 providing for representation of Dress Code in Educational Institutions,” the court stated:

“In the view of the above, we are of the considered opinion that the government has power to issue that impugned Order dated 05.02.2023 and that no case is made out of its
Ultimately, the court declared the sixth argument invalid amongst the five other arguments, and no case could be made out of the arguments the petitioners had presented.

The seventh question is about “International Conventions And Emancipation of Women.” The above talks about India’s involvement in various International conventions they are involved in such as “Universal Declaration of Human Rights (1948), Convention of Elimination of all forms of Discrimination against Women (1981), International Covenants on Civil and Political Rights (1966), United Nations Convention on Rights of Child (1989) are...few to name.” Amongst the arguments made the main argument has been highlighted within the decision by the High Court is from the Chief Architect of Constitution and it is stated “more than half a century ago about the purdah practice equally applies to wearing of hijab there is a lot of scope for the argument that insistence on wearing of purdah, veil, or headgear in any community may hinder the process of emancipation of women in general and women in particular.” Overall, the argument of women’s emancipation has been linked to the purdah practice. The purdah practice is defined as a “...system of secluding women and enforcing high standards of female modesty in much of South Asia.” The purpose of introducing the purdah practice was for modesty and to seclude women from the world. Additionally, historically, ‘purdah was a life experience for many women who were residing in South East Asia, especially those who belonged to Hindu and Muslim families.’ The Court, whilst arguing about the purdah practice, states that ‘by having school uniform and excluding the hijab from the dress can be a step forward in the direction of emancipation and more particularly, to the access of education.’ Overall, in regards to this argument, the Court has stated that wearing of hijab may restrict the emancipation of women, therefore, prohibiting “...equal opportunity of public participation and positive secularism.”

Considering the eight main arguments the petitioners have put through and the court’s responses to those arguments, the court has ultimately had “in the above circumstances, all these petitions being devoid of merits, are liable to be and accordingly are dismissed.” Therefore, the petitions were dismissed, and the wearing of the Hijab in Governmental run educational institutions was made illegal.

Chapter 3 – Literature Review and Methodology

In the world of traditional media and reporting, framing plays an essential role in how the viewer/readers perceives and interprets various different accounts of news. Scholars and

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143 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 121.
144 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 113.
145 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 122.
146 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 122.
147 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 124.
151 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 124.
152 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 124.
theorists have examined different ways frames are used and the framing theory emerged. The main features of the theory relevant to my research are framing, misinformation and the psychology of framing which have been used to mislead, reinforce power relations by creating frames of blame frame, us-versus them and the division frame. Scholars Scheufele and Tewskbury view ‘framing as a way in which issues within news reports can impact on how issues and reports are understood.’ In a similar manner, Nelson, Clawson, and Oxley note that “frames can exert appreciable influence on citizens’ perceptions on the issue.” Framing is a concept that is used by sources to frame an article/issue in a certain manner that can influence audiences psychologically to convince them to believe what is shown to be true. Comparatively, “when media influences lead views to discuss and negotiate matters of importance with others in their lives, the media set in motion transactional experiences that further shape the course of change.” Although the media has the power to frame the issue in a particular manner to psychologically persuade members of the audience it also helps influence change through their coverage. Furthermore, this leads to audiences to discuss issues from a critical perspective and to find common trends amongst themselves about the issue. Additionally, within the institution of Media coverage “Journalists are the final arbiter of what is likely to be interesting.” What this means is that ‘ultimately the journalists frame events within a particular coverage in mind.’ Where overall, ‘one opinion and perspective dominates the coverage in the public scene whilst the less dominated perspective is eradicated from the public eye and awareness.’ The overarching definition and meaning of framing continues to evolve where framing was seen as being a psychological influence upon readers to stage events and issues with a certain coverage in mind that is done by journalists who are the final arbiters of news. This means the most popular opinion would dominate the news coverages whilst the least popular perspective is eradicated from the public sphere of the media channels and minds of the views and readers.

The concept of framing is linked to various other concepts such as misinformation that play an integral role in the way issues are viewed and perceived. Often news that is against the nation’s views is used to misinform the consumers in a way that they believe the Government is correct and the others are wrong. Furthermore, news is often used to misinform the public and different news channels that have an agenda that caters for their target audience and stakeholders. Where ‘misinformation potentially can shape an individual’s attitude towards an issue and news articles based on the way it is written even if it is false.’ Similarly, “in the real world, misinformation effects are not limited to its capacity to create belief echoes.” Whilst some fake news is correct “some information goes entirely uncorrected.” It is stated ‘media channels that support parties and political candidates are more likely to show and portray fake news and have a fixed agenda to showcase information across various different issues.’ Likewise, Bennett and Livingstone note that in many cases

154Nelson, Clawson, and Oxley, “Media Framing of Civil Liberties Conflict and its effects on tolerance.” 573.
156Cook, Introduction: Why don’t we call journalists political actors?,” 7.
157Cook, Introduction: Why don’t we call journalists political actors?,” 7.
158Noelle-Neumann, The Spiritual of Science: Public Opinion, Our Social Skin, 5.
“the spread of disinformation can be traced to growing legitimacy in many democracies.” 163 When misinformation is spread it can harm democracies in the way they function and can ultimately question the legitimacy of the democracy of the nation.

“In many cases, disinformation is associated with the efforts of the movements and parties on the radical right to mobilize supporters against centre parties and the mainstream press that carries their message.” 164 The Bin Laden example of planning the 9/11 attacks shows misinformation. “As CNN’s John King reported, administration officials said the video showed Bin Laden “talking about how, and one official laughing when he does so, that many of those hijackers did not know, when they were planning those attacks, that they would die in what ultimately became suicide hijacking.” 165 Comparatively, ‘in the video Bin Laden spoke about the hijackers not knowing the details of the attack/operation until the operation actually took place although they did know that they were participating in a “martyrdom operation”.’ 166 The overall purpose of ignoring the facts was due to the video explicitly showing that the main story showed ‘Bin Laden admitting to planning the attacks.’ 167 This case shows the media and stakeholders determine how stories are framed. Often important details are ignored when an event of significance occurs especially those of national significance. Contrastingly, Kuklinski et al notes “…widespread information can lead to collective preferences that are different from those that would exist if people were collectively informed.” 168 When misinformation is shown as a technique to misguide people then as a consequence it misguides individuals who rely on the news to inform them honestly and reliably about issues that may occur domestically and internationally. Additionally, they also state “in principle, misinformation can greatly distort the citizenry’s collective voice.” 169 Overarchingly, misinformation through framing can impact various spheres such as undermining various issues, impacting collective voices of the citizens and undermining the concept of democracy and its importance.

Elitism and framing are also linked together when issues are revealed to the public. As the “government…set the boundaries for public discourse on most government policies…also set boundaries for discussion of the media as political actors…” 170 In an democratic nation, despite having the right to express our opinion we are often constrained due to the government’s role in what is displayed within the media in regards to different issues. For example, “…media interventions in day-to-day contests to control government power within ideological confines of mainstream American Politics.” 171 Despite the media trying to control contests in American politics the government and elites play an integral role in what is shown and ignored due to stakeholder pressure and business interests that are associated with the ownership. Similarly, Armoudian notes that “media are inextricably intertwined with events,
political leaders, and societies, which collectively construct outcomes. As media influence people, cultures, and societies, those people, and cultures, in turn influence the media.” 172 This means there's a reciprocal relationship between the media and their influence on people and cultures whilst in return those people and cultures influence the media. Furthermore, there are other factors that also control the media. Ultimately it shows “the two way relationship between the media and the elites.” 173 For example, “…Cambridge Analytica’s last-minute efforts resulted in Trump narrowly winning six crucial states won by Barack Obama in 2012…” 174 This shows that not only elites, but British Political Consulting Firm such as Cambridge Analytica can have an influence on the overall result of an outcome. Furthermore, “…pre-existing political and economic structures remained intact during Trump’s presidency: America’s power elite certainly has not lost influence, nor have its two major political parties.” 175 This ultimately shows “…elite domination of policy debates is attributable to two mechanisms: Government sources provide the mass media with the majority of the political information they report, and journalists calibrate the range of opinions in their stories to represent what is perceived to be mainstream government debate.” 176 This means that the Government sources are the main sources that provide majority of the information in regards to policy whilst the media collects and collates opinions in regards to the stories received. Convincingly, the ACORN (Association of Community Organization for Reform Now) example shows that ‘opinion entrepreneurs can be powerful contenders in setting the agenda and media framing where closer elite ties to the media go straight to the mainstream media.” 177 Similarly, Armoudian notes that things like ‘structures, systems, and approaches to mass media are used to choke, oppress and intimidate life.” 178 This includes the Political system of the country and various stakeholders such as elites, businessmen and politicians who articulate and sway the framing of issues and the news. Comparatively, Wolfsfred notes that “the greater degree of elite consensus and the lesser degree of the crisis, the more likely it is that the news will play a constructive role in a peace process.” 179

The framing of cases reported by the media is also interesting. “News reports, like tort reform publicists, will often reshape potentially newsworthy cases to secure interest attention.” 180 Additionally, amongst the parallels “…between the tort tales and news narrative follows at least part from the elements of constructing stories that satisfy mass audiences. If they had to, tort reformers might be willing to distort news narratives.” 181 When framing print media and court cases, it comes down to framing narratives that satisfy the audiences. However, also the media must twist and misreport court cases within the media. Additionally, Clawson et al. note that “unlike other policy makers, the Court largely leaves the framing of its decisions to others. Consequently, the press and television play an essential pronounced role in

172Armoudian, Kill the Messenger: the media’s role in the fate of the world, 168.
173Armoudian, Kill the Messenger: the media’s role in the fate of the world, 168.
176Bell and Entman, “The media’s role in America’s exceptional politics of inequality Framing the Bush Tax Cuts of 2001 and 2003,” 553.
177Dreier and Martin, “How ACORN was framed: Political Controversy and media agenda setting.” 782.
178Armoudian, Kill the Messenger: the media’s role in the fate of the world, 170.
179Wolfsfred, “Building Theory,” 44.
180William, “and McCann, Distorting the Law: Politics, Media, and the Litigation Crisis, 158.
181William, “and McCann, Distorting the Law: Politics, Media, and the Litigation Crisis, 158.
influencing knowledge about the Court’s articulation of policy.”¹¹⁸² This means that the Court does not play a direct role in deciding the framing of the decisions. However, the press and television media play an integral role in deciding the framing, which can include portraying the decision in favour of the victims or dehumanising the victims and praising the criminal, for example. Comparatively, “media cannot rely on members of the Court to inform them when it is about to issue an important decision. Media must instead look to other cues in determining whether a case merits coverage.”¹¹⁸³ Ultimately the Courts do not have a say in how the decisions are framed. The media outlets need to find ways to decide how decisions are portrayed within the media. Which ultimately leads to the viewers interpreting how they perceive the news.

Overall, framing has multiple aspects that work together as a system to either spread correct and true information whilst there are new chains that have the ability to spread misinformation in order to cater for their audiences and their stakeholder.

## Methodology

To analyse the Karnataka High Court’s decisions framing within the press media I used a two phased approach. To assess the framing within the press as part of my research I first read and analysed the decision and the reasons given by the High Court of Karnataka in upholding the ban. This involved reading the decision, then understanding the questions raised by the petitioners, and analysing the logic applied by the three Judge bench who overheard the case. The second phase of the research includes assessing how the High Court’s decision in regards to the Hijab Ban has been reported and framed. I first conducted a media content analysis of news articles in three national press media newspapers. As this is a new policy introduced that was upheld by the High Court I used cross coding by making spreadsheets for each newspaper in order to have a clear indication of what types of articles were published and the frame used. To test the reality of framing the decision against the reality (in the court document) I will be analysing the frames present amongst the articles.

The second phase of the research includes assessing how the High Court’s decision in regard to the Hijab Ban has been reported and framed in the media. I first conducted a media content analysis of news articles in three national press media newspapers. As this is a new policy introduced that was upheld by the High Court, I used cross coding by making spreadsheets for each newspaper in order to have a clear indication of what types of articles were published and the frame used. To test the reality of framing the decision against the reality (in the court document) I will be analysing the frames present amongst the articles.

The third part of the thesis will find and explain the discrepancies. Which will include comparing and contrasting the print media’s coverage of the Court’s decision and explaining any discrepancies that may be visible or have arisen as a part of my research when analysing the framing of each press media newspaper.

In the methodology section, I first detail the methodology for this research. Next, I address the process of conducting the research.

¹¹⁸³Still, Metzgar, and Rouse, “Media Coverage of the U.S. Supreme Court: How Do Journalists Assess the Importance of Court decisions?,” 60.
Methodology:
For this study, I will be using the single case study method and empirical research to examine the Karnataka Hijab Ban that Educational institutions announced in December 2021. Furthermore, the Karnataka High Court, after listening to petitions by students, Educational Institutions, and other stakeholders, decided to uphold the ban on March 15, 2022. The single case study method can be defined as “...essential 'building block' for empirical research.”\footnote{Pierce, Collecting Data Sets: Case Studies, Experimental, Comparative, Longitudinal and Action Research Methods, 54.} Additionally, for a single case study method to be effective “it must provide basic minimum information to enable research questions to be answered and the research hypothesis to be tested.”\footnote{Pierce, Collecting Data Sets: Case Studies, Experimental, Comparative, Longitudinal and Action Research Methods, 54.} For the purposes of this research the question I am examining is:

| Table 7 - the above table notes the Research Question that is going to be researched as part of this thesis. |
| How has the High Court's decision in regards to the Karnataka Hijab Ban been reported and framed in the media? And how is framing between the print press framing compared to the overall decisions? What explains the overall significance amongst the decision and the framing of the decision amongst the print press? |

My research will be done in a three step process. Firstly, by examining and reading the decisions that were published in the court document that was published by the High Court of Karnataka. Secondly, I will analyse the framing amongst the three newspaper sources (Zee News, Times of India, and Economic Times). Lastly, I will compare and contrast (similarities/differences) the way in which different press media outlets framed the decision and to suggest reasons why the decision is framed the way it is.

Methods used for this study
For the purposes of this research, I will be using the ‘Single Case Study’ method alongside the concepts of qualitative and quantitative research methods in examining the framing between the print press framing compared to the reality of the decision by the High Court of Karnataka. The concept of Single Case study can be defined as “...the essential ‘building block’ of empirical research.”\footnote{Pierce, Collecting Data Sets: Case Studies, Experimental, Comparative, Longitudinal and Action Research Methods, 54.} Furthermore, for this form of study to be effective “it must provide the basic minimum information to enable research question to be answered and the research hypothesis to be tested.”\footnote{Pierce, Collecting Data Sets: Case Studies, Experimental, Comparative, Longitudinal and Action Research Methods, 54.} This methodology is relevant to my research as I will be using the case study of the Karnataka Hijab Ban which would be the building block for conducting my print press analysis against the reality of the Karnataka Hijab Ban decision presented by the High Court. I will also be using quantitative and qualitative research methods amongst my thesis. Firstly, quantitative can be defined as “...gathering numerical data and generalising it across groups of people or to explain a particular phenomenon.”\footnote{University of Southern of California, “Research Guide.”} For the purposes of this research, I will be using descriptive statistics to summarise and organise data so it can be easily understood. This will include making a table graph to showcase clear representation of the frames present amongst each newspaper. This is to see the comparison amongst the newspapers and what frames are the most prevalent. Using a table graph would allow clear representation of the frames used by each newspaper and the number of articles that showed the frames. Furthermore, allow clear comparisons to be made.
Secondly, qualitative research methodology can be defined “...is to determine the relationship between one thing [an independent variable] and another [a dependent or outcome variable] within a population.”

The independent variable in this research is the High Court of Karnataka and the eight reasons given by court in regards to the ban which will be used to compare against the dependent variable of the three chosen newspaper. Which will be used to see the reality of the framing against the reality amongst the court document. I will be analysing the frames present amongst the articles.

**Media Content Analysis**

For the purposes of this study I will be conducting a “media content analysis.” Media content analysis can be defined as “...a subset of content analysis and applies to a systematic method to study mass media as texts, including...TV programmes and content of newspapers and magazines.” Essentially this form of study “...is often used to decipher the relationship between media and public opinion.” Additionally, “...according to a propaganda model contending that the state exerts powerful influence over media through regulation, through censorship, and as a major source of “reliable information.” This content analysis is to examine print media sources from the period of February 15, 2022, to April 15, 2022. The purpose of looking at these dates is to frame prior to the ban, during the period (March 15, 2023) when the High Court of Karnataka upheld the Hijab Ban, and to see period after the ban to analyse the decision of the ban and to see any potential discrepancies. This would enable me to see how the decision has been framed amongst the press media and to have a reliable sample of the decision amongst the three press media newspapers (Zee News, Times of India, Economic Times, and The Telegraph).

**Time Frame:**

For the purpose of this study, the articles collected span from the period of February 15, 2022 to April 15, 2022. These dates cover the period of just before the decision of the ban was going to come out and the date (March 15, 2022) Karnataka High Court officially upheld the ban and ensured and prohibited female students from entering educational institutions if they wore the Hijab. The purpose of focusing on this period is for two reasons. Firstly, this is the period where the main debate was about whether it should be permissible for female students to wear the Hijab (cover their head) within government run educational institutions (one of the most prominent questions asked and answered by the High Court of Karnataka. Secondly, the period of March 2022 was significant as on ‘March 15, 2022’ was the date the High Court of Karnataka officially announced and upheld the Hijab ban whilst outlining various reasons for taking this stand. Overall, the articles used for the purpose of this study were only those that matched the search terms of “Karnataka Hijab Ban”, “Hijab Ban Karnataka”, “High

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189University of Southern California, “Research Guide.”
190Edith Cowan University, “Media Analysis.”
191Dallimore et al., “Media Content analysis of the introduction of a “soft op-out” system of organ donation in Wales 2015-17,” 487.
192Dallimore et al., “Media Content analysis of the introduction of a “soft op-out” system of organ donation in Wales 2015-17,” 487.
Court decision of the Karnataka Hijab Ban, and “Hijab Ban” on each newspaper's search bar. The total number of articles used in the research are 200.

**Media Sample**
The purpose of studying press media and independently owned press for this case was due to the accessibility of press media in India. The newspapers I have chosen to do are Zee News, Times of India, and Economic Times). All these three newspapers run nationally in various states. Therefore, most of the population has access to physical newspapers that are delivered daily to their doors or through online search engines to get their current affairs. Within India, there is a significant divide between rural and urban communities. According to the World Bank (n.d.), in 2021, “65%”\(^{193}\) of the population lived in rural areas. Within these areas the majority of the population resides in areas where access to basic amenities such as Hospitals, Wi-Fi, and necessities are vastly limited but accessible. Amongst the population residing in rural areas, ‘agriculture is the primary industry where most of the community lives and works on their farms.’\(^{194}\) Comparatively, in 2021 “35%”\(^{195}\) of the population resided in urban areas. ‘Most individuals residing in urban areas work non-agricultural jobs.’\(^{196}\) The importance of why my question matters is that the print press is one of the most important forms of media accessible to the public and not only through door-to-door delivery daily but through the internet services as they can use search engines to search through the archives of different newspapers. Furthermore, this research will show the differences between the reality of what the decision has said and how the press has framed and reported the issue. The reality is that rural communities rely heavily on newspapers to get their current daily affairs. Urban communities have access to better facilities and infrastructure, including better WIFI connectivity, which allows them to get their current daily affairs through various press outlets. The circulation of newspapers within India has been significant. In the year of 2017-2018 period, the total number of newspapers circulated was “43,00,66,629”\(^{197}\) including the circulation of Hindu publications at “19,56, 21,990,”\(^{198}\) English publications “at 5,34,53, 564,”\(^{199}\) and Urdu publications at “2,52,89,731.”\(^{200}\) These statistics show that the circulation of newspapers in Hindi, English, and Urdu is the most popular among India’s citizens. Due to the popularity of press media in India in terms of accessibility and circulation for this research, I have decided to research press media and the framing of the High Court decisions regarding the Karnataka Hijab Ban.

**Sampling Methodology and Search Criteria**
The methodology of how online content media analysis is conducted is vastly limited. Due to this reason, I have created an approach for searching for online articles in various newspapers (Zee News, Times of India, and Economic Times). The component analysis for this research is complete, text-based articles. My first step is to establish a reliable sample population of

\(^{193}\) World Bank, “Rural population (% of total population) - India.”  
\(^{194}\) National Geographic, “Rural Area.”  
\(^{195}\) World Bank, “Urban population (% of population) - India.”  
\(^{196}\) National Geographic, “Urban Area.”  
\(^{197}\) Office of Registrar of Newspapers for India - Government of India, “Press in India.”  
\(^{198}\) Office of Registrar of Newspapers for India - Government of India, “Press in India.”  
\(^{199}\) Office of Registrar of Newspapers for India - Government of India, “Press in India.”  
\(^{200}\) Office of Registrar of Newspapers for India - Government of India, “Press in India.”
articles to cross-compare between the news sources from internal online archives of the newspaper’s websites. Using the newspapers archives website, I searched the most popular national newspapers: Zee News, Times of India, and Economic Times. Several search terms were used to ensure that the whole population of articles about the Karnataka Hijab Ban would be retracted and used. These include: “Karnataka Hijab Ban,” “Hijab Ban Karnataka,” “High Court decision of the Karnataka Hijab Ban,” and “Hijab Ban.” In order to achieve the reliability of retracting the number of articles from each website, I would double-check the archives of each newspaper’s website to ensure reliability when collating the data sample of the articles and analysing them for this research.

**How I will Conduct this Analysis**

For the purposes of the research, this subsection will showcase how I conducted my framing analysis. Firstly, I read over the decision document that was published by the High Court of Karnataka and the five decisions published by the court in answering the petitioner's decisions and, finally, upholding the ban. Secondly, I chose my three newspapers (Zee News, Times of India, and Economic Times). I went through the search engine of the archives of each newspaper's website using the terms “Karnataka Hijab Ban,” “High Court decision of the Karnataka Hijab Ban”, and “Hijab Ban” to search for articles relating to the decision of the ban. As I found the articles, I created a spreadsheet for each newspaper that encompasses the date the article was published, the subject, the focus, framing analysis (what frames are present in the article), and keywords present. The purpose of this is to conduct a coding analysis. Fourthly, to ensure the reliability of retracting the number of articles present from each of the newspapers' websites, I would double-check each article. Additionally, I will collate the data sample and analyse the data at hand for this research thesis. Thirdly, whilst collating and reading each article I will categorise the article into the relevant frames. As analysed. Lastly, once the data is collated I will be ready to start my research and write up my thesis.

**Coding**

For the purposes of my research and to ensure the research is reliable I will be using the code reference technique. This will include three major steps. Firstly, I will be conducting an online search on each newspaper's website archives for all the articles using “Karnataka Hijab Ban”, Hijab Ban Karnataka”, “High Court decision of the Karnataka Hijab Ban, and “Hijab Ban.” Secondly, I will be creating an excel sheet which encompasses the date the article is published, what the subject is, what is the focus, and framing analysis (what frames are present in the article). Thirdly, once the search of all the articles are complete and double checked on the archives of all the newspapers websites I will be able to start my research.

**Reliability**

The coding process was done by myself (the main researcher). The coding process was done by myself (the main researcher). And the articles used in the research were all double-checked. To ensure that no articles were doubled up and that all the articles were inserted in the excel sheets from February 15, 2022 to April 15, 2022. Additionally, I also doubled checked all articles in relation to the decision published by the High Court of Karnataka in each press to ensure reliability in the statistics provided. Overall all these steps were taken to ensure reliability within the research.

**Chapter 4 – Print Media Framing of the Decision**
This chapter uses the us-versus-them, blame frame, and cooperation frame to explore the similarities and differences between the ‘The Times of India,’ ‘Zee News,’ and ‘Economic Times.’ For this research, I used three Press Media Newspapers (Zee News, The Times of India, and Economic Times). These are national newspapers where the public interacts daily to get their current affairs.

Figure 1 compares the three publications (Zee News, The Times of India, and Economic Times) published from February 15, 2022, to April 15, 2022. Zee News published a total of 28 articles about the Karnataka Hijab. At the same time, The Times of India Press published a total of 99 articles. Lastly, Economic Times published a total of 40 articles. The press coverage of the Karnataka Hijab Ban has been significant, especially during and after the Karnataka High Court’s verdict on the issue.
Figure 2 - Number of Articles published in relation to the frames amongst Zee News, The Times of India, and Economic Times from the period of February 15, 2022 to April 15, 2022.

Figure 2 compares the three press mediums and the number of articles under each framing category. The graph shows that the us-versus-them was used significantly between the three press mediums. At the same time, the blame frame was used significantly less. As The Times of India used the us-versus-them significantly partially, the reason for this is that the Karnataka Hijab ban-related articles were significant, and the issue was significantly covered. In contrast, Zee News and Economics Times did not widely cover the issue as much as The Times of India.

Key Words

Muslim, Karnataka, Hijab ban, Hijab row, saffron shawls, female students, headscarves, BJP (Bhartiya Janata Party), High Court, verdict, controversy, not an essential practice, uniform, reasonable restriction, Constitution, prescription, Islam, discipline, Supreme Court, discrimination, headscarf, exams, sensationalise, rights, Quran, Teachers, suspended, essential practice, reasonable restriction, constitutionally permissible, Constitution of India, Government Order,

Table 8 shows the variety of keywords used amongst the three Press Mediums

Us-vs-Them Frame - State Institutions vs The Protesters
One of the most prevalent frames in the framing of the Karnataka Hijab Ban (Row) is known as the us-versus-them frame, also known as the “good-guys-bad-guy-frame,” which “tends to assign moral correctness to ‘us’ while assigning immorality to the ‘others,’ a subjective assessment.” Using us-versus-them is a subjective assessment of ‘us’ and ‘them’ where you assign moral correctness to those who are shown to be correct and to the ‘others’ immorality is assigned. The ‘us’ in the framing concerning the Karnataka Hijab Ban (Row) is

the State Institutions, the main one being the High Court of Karnataka (who heard the arguments of the petitioners and the teachers/politicians on the issue before upholding the Hijab ban and banning female students from wearing the Hijab in their Educational Institutions) and the former Chief Minister of Karnataka Basavaraj Bommai. The former Chief Minister of Karnataka, Basavaraj Bommai, is part of the Bharatiya Janata Party (also known as the BJP). The leader is Narendra Modi (the current Prime Minister of India). While the ‘others’ are the petitioners who took the case to the High Court of Karnataka to challenge their Constitutional Rights and rights within their Educational Institutions. These players are integral; the Karnataka Government has tried and become successful in prohibiting an item of religious significance (the Hijab) in Government run Educational Institutions. While the ‘them’ are the Petitioners and Islamic Religious organisations who collaboratively tried to challenge the Government and their Educational Institutions to prohibit them from wearing the Hijab and practising their religion while going to schools to complete and take part in their exams.

**Zee News**

Zee News Newspapers uses the Us-versus-them frame significantly as 22 (78.5%) out of the 28 articles published in the timeframe of February 15, 2022, to April 15, 2022, which showcases the state institutions, and the petitioners who protested against the ban on the Hijab in Karnataka. This includes the actors such as the Chief Minister and the Educational Institutions who have implemented the ban and prohibited female students from entering the school grounds. The us-versus-them frame has two main trends. Firstly, it is about the protesters (petitioners) vs the government. Zee News framed the Karnataka Hijab ban as constantly reporting on the issue as one where the Hijab should be banned entirely, and those who protested against it or attempted to come to school wearing their Hijab would be sent back home for breaking the rules. Groups like the BJP youth wing wanted a complete ban on Hijabs.

As mentioned in an article, “the BJP’s youth wing on Friday took out a march in Aligarh, demanding a complete ban on the hijab in educational institutions.” Furthermore, “BJYM district vice president Saurabh Chaudry said his organisation would hold demonstrations in all educational institutions to check students from wearing hijabs or caps inside educational institutions.” This shows the steps the BJYM (Bhartiya Janata Yuva Morcha) took into their hands to prevent female students from entering the school premises while wearing the Hijab. Additionally, they would check the school premises to check whether the students are breaking the rules. Similarly, this shows the us-versus-them frame as the Bhartiya Janata Yuva Morcha is being shown to be morally correct. In contrast, the others (female students) are shown as being the ones who are breaking the rules. Similarly, an article stated, “amid the ongoing controversy, a Class VI student was allegedly barred from class in a government school in northeast Delhi’s Mustafabad for wearing a hijab.” The usage of the word “controversy” shows negative connotations on the issue of the Hijab ban. Additionally, this example shows that all around the country, there has been an attempt to prohibit female students from wearing the Hijab in their educational institutions, and teachers play an integral role in prohibiting girls from wearing the Hijab. The girl states, “my teacher told me to remove my headscarf. She said, ‘Mummy mat bano. Kal sse scarf pehenke mat aana nahi toh

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203 Zee Media Bureau, “BJP youth wing demands full ban on headscarves in educational institutions held protests in Aligarh,”
204 Zee Media Bureau, “BJYM district vice president Saurabh Chaudry said his organisation would hold demonstrations in all educational institutions to check students from wearing hijabs or caps inside educational institutions,”
205 Zee Media Bureau, “Hijab Row reaches Delhi, Class VI student barred from class in school in Mustafabad.”
class se bahar nikaal doing (Don’t be like your mother. Don’t wear a scarf from tomorrow, or you will be removed from class.”

This example shows that not only is the High Court of Karnataka playing an integral role in banning the Hijab, but prior to banning the Hijab in Educational institutions, the teachers have played an integral role in enforcing the Karnataka Hijab ban around the country.

The second trend is the decisions by the High Court of Karnataka, in which out of 28 articles published on the Zee News website, seven articles talked about the decisions. Out of the seven articles that talked about the High Court's decisions that wearing the hijab is a religious practice. Seven articles talked about “...as to wearing hijab is an inviolable religious practice in Islam and much less part of 'essential religious practice.' ...We are of the considered opinion that wearing of hijab by Muslim women does not form a part of essential religious practice Islamic faith.”

The overall decision by the High Court of Karnataka stated that the three-judge bench is of the “...the view of the above discussion, we are of the considered opinion that wearing of the hijab by Muslim women does not form a part of essential practice in Islamic faith.”

This was one of the main arguments that have been used in the Zee News Newspapers for the framing of the issue. In particular, the decisions that the High Court of Karnataka made in this argument were highlighted significantly. By prohibiting female students from wearing the Hijab, Zee News has constantly highlighted that wearing the Hijab is not an essential practice within Islam; therefore, the High Court prohibits this religious practice as necessary.

Secondly, the second most highlighted decision within Zee News was about the prescription of Uniforms and whether or not this is constitutionally permissible. Five of the seven articles (amongst the 28 articles published by Zee News) talked about “the prescription of school uniform is a reasonable restriction which students could not object to, the Karnataka High Court said while pronouncing its judgement in Hijab row....”

The petitioners argued whether or not Educational institutions are Constitutionally allowed following the Constitution of India to prescribe Uniforms. One article notes, “the prescription of school uniform is a reasonable restriction which students could not object to, the Karnataka High Court said while pronouncing its judgement in the Hijab row case....”

This means that Constitutionally Educational institutions can prescribe uniforms, and students are obliged to accept and are not allowed to reject the Uniform that is being prescribed. Overall, the prescription of Uniforms is the second most talked about decision within the Zee News print media framing of the decision.

Lastly, the third most talked about decision is the February 5, 2022, order. Two articles out of the seven about the decision discussed the February 5, 2022, order. The order discussed “…representation of Dress Code in Educational Institutions.”

Within the order, ‘it does not specifically prescribe the type of dress code but it provides uniform to be prescribed by different educational institutions.’ Furthermore, it discusses who can prescribe uniforms, such as the State government, school management, and the Department of Pre-University Education. One of the articles stated that “the bench also maintained that the government has

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206 Zee Media Bureau, “Hijab Row reaches Delhi, Class VI student barred from class in school in Mustafabad.”
207 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 87.
208 Srivastava, “Wearing of the Hijab not an essential practice of Islam, Says Karnataka High Court.”
209 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
210 Srivastava, “Wearing hijab not an essential religious practice of Islam, says Karnataka High Court.”
211 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 113.
212 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 113.
the power to issue impugned government order dated February 5, 2022, and no case is made out for its invalidation. By the said order, the state government had banned wearing clothes that disturb equality, integrity, and public order in schools and colleges.”

Overall, Zee News Framing of the decision talked about three major decisions that the High Court of Karnataka took. Firstly, the most highly talked about decision was whether wearing the Hijab is an essential practice within Islam. The High Court stated “...that wearing of hijab by Muslim women does not form part of essential practice Islamic faith.” The second decision discussed is whether or not educational institutions can prescribe uniforms in accordance with the Constitution of India. In which the Court declared ‘no restriction can be placed on what an individual wants to wear in accordance with one’s autonomy but that can only be done within reasonable regulation.’ This includes not disturbing the peace, equality, and public order within the public sphere. Lastly, the decision is the order of February 5, 2022, which was about prescribing uniforms but not the type of uniform each institution should provide. It is a generic order that asks school institutions to prescribe uniforms for students and those attending Educational institutions.

**Times of India**
Comparatively, the newspaper known as Times of India published the most articles concerning the Karnataka Hijab Ban (Row), with a total of 99 articles published. This shows various frames showcasing the protesters as the instigators, the cause, and the victims. One of the main frames shown in the framing of the Karnataka Hijab ban is the us-versus-them frame, as 66 articles (66.6%) out of 99 articles published in the timeframe period of February 15, 2022, to April 15, 2022, which shows the role various actors have played in the ban such as school institutions, political actors and the High Court for a highly contentious issue. Additionally, it is about morally judging who is right and wrong in this controversy which is a subjective judgement. The us-versus-them frame has two main trends in framing the issue amongst the ‘Times of India’ framing. Firstly, it is about female students standing up against their educational institutions, especially when they were denied entry into their schools for exams. As one article notes, “…alleged denial of entry for girl students into schools with their headscarves on in some places, as one girl announced boycotting her exams in response to the dikhat.” This quote shows that female students are being denied entry into their schools, and some are going to lengths to avoid their exams. This shows two main issues. Firstly, the issue is that the power of institutions and teachers to police students to prohibit them from entering the school premises of educational institutions is at the discretion of the school staff. The female students being prohibited from entering the school grounds shows the schools and the state of Karnataka’s position on the headscarf and Hijab issue. Secondly, the rules and regulations that the Karnataka Government puts forward have to be followed, and this usually means that the school has to follow these rules strictly even if they do not support the government or the regulations.

Another article similarly shows “scenes of angry parents of children arguing with police and school authorities and an instance of a student trying to flaunt a saffron scarf as an apparent retaliation….“ Furthermore, the article talks about “the Karnataka High Court, in its
interim order last week restrained all the students from wearing saffron shawls, scarves, hijab and any religious flag within the classroom.”

The framing of the Karnataka Hijab ban issue has had multiple actors that have played an integral role which includes the Karnataka High Court, which had the responsibility of upholding the Constitution of India and giving orders following the Constitution of being a secular country where everyone has the right and freedom to practise their religion. United Nations Declaration of Human Rights notes in Article 18 that “everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.”

The High Court of Karnataka has been one of the leading State Institutions that has played a critical issue in issuing orders that would ultimately lead to parents being dissatisfied, and overall, the female students and their parents have to pick and choose whether they attend their school or practise their religion.

The second trend is regarding the decisions of the High Court of Karnataka in which out of the 99 articles published 13 of the articles explicitly talked about one of the most talked about questions put forward by the petitioners. That being whether wearing the hijab is considered an essential religious practice within Islam. One article notes, “the Karnataka high court ruled on Thursday that wearing the hijab is not an essential religious practice of Islam.”

Another article also mentions that “Karnataka high court on Tuesday dismissed various petitions challenging a ban on Hijab in education institutions and said that wearing a Hijab is not an essential practice of Islam.”

The court's decision to declare the wearing of the Hijab (headscarf) as not an essential practice has led to multiple female students having to pick and choose between their education and practising their religion. These are two of the most critical aspects of an individual's life, especially in a South-East Asian household. Overall, 12 out of 99 articles talk about the decision of the Hijab not being an essential religious practice within Islam and one that is highlighted significantly. Multiple schools have restricted female students from entering their exams while wearing the Hijab, leading to students boycotting their exams.

Secondly, the petitioner’s argument about the Constitution of India guarantees rights. Out of the 12 articles published out of the 99, 2 articles talk about the Constitutional arguments regarding the Karnataka Hijab ban. As one article notes, “a three-judge bench of Chief Justice Ritu Raj Awasthi, Justice Krishna S Dixit and Justice JM Khazi rejected the please that that ban violates rights guaranteed by the Constitution under Articles 14 (equality), 15 (no discrimination over faith, 19 (freedom of speech & expression), 21 (protection of life & personal liberty), and 25 (freedom of religion).”

The High Court of Karnataka rejected the petitioner's plea of violation of fundamental rights. Extensively these articles include Article 14, which is about “Equality before law,” Article 15, “Prohibition of discrimination on

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218The Times of India, “Burqa-Clad girl asked to remove hijab, boycotts exam in Karnataka.”
219United Nation, “Universal Declaration of Human Rights.”
220Kumar, “Hijab not essential to Islam, says Karnataka HC, upholds.”
221ANI, “Anti-national forces cannot be tolerated, says Karnataka CM after three judges receive threats for hijab verdict.”
222Kumar, “Hijab not essential to Islam, says Karnataka HC, upholds.”
223Legislative Department, “Constitution of India.”
grounds of religion, race, caste, sex or place of birth,” Article 19, “protection of certain rights regarding freedom of speech,” Article 21 “protection of life and personal liberty,” and Article 25 “freedom of conscience and free profession, practice and propagation of religion.” Overall, these rights are those rights that every democratic country holds to the highest standard. With the plea being rejected by the High Court, it is a downfall of all those female students who wear the Hijab and practise their religion while getting an education.

Thirdly, is the argument about the accuracy of the argument of the reasonable restriction. As out of the 12 arguments published out of the 99, 2 articles talk about the reasonable restriction argument in which the petitioners argued that prescribing uniform is not Constitutionally permissible per the Constitution of India. Additionally, the counsel of petitioners petitioned that the female students should be allowed to wear the Hijab that matches the uniform and in accordance with the Educational Institutions uniform. In which the court stated that “prescription of uniform is only a reasonable restriction, constitutionally permissible which students cannot object too.” This ultimately means restricting the uniform type students wear is Constitutionally allowed. The school can prescribe uniforms that follow the Constitution, and it is at the discretion of the Institution what they allow or do not allow.

Lastly, 3 out of the 12 articles published out of the 99 articles discussed the Government order passed on February 5, 2022. The petitioners questioned the “...validity of Government Order Dated 05.02.2022 providing for representation of Dress Code in Educational Institutions.” Furthermore, the order sets out who can prescribe uniforms in different institutions; this includes government schools, private schools, Pre-University colleges, and schools that do not have a specific dress code. Different institutions have different institutions that prescribe these uniforms. Overarchingly, three articles talked about this order. One article states, “the high court maintained that the government has power to issue impugned order dated February 5, 2022 and no case is made out for its invalidation.” Similarly, another article notes, “the government order effectively banning headgear in educational institutions is valid.” The order was introduced to maintain peace and public order within the state and to prohibit items of clothing that would impede on the peace and integrity of the state.

Overall, in the ‘Times of India’ framing of the decision it talked about four decisions that the High Court of Karnataka ruled and took in which it upheld the Hijab ban in Educational Institutions. Firstly, the High Court talked about decision about whether or not wearing the hijab is an essential religious practice within Islam or a cultural practice. In which the High Court of Karnataka stated that wearing of the Hijab is not an essential practice. This consequently, gave female students the choice to pick their religion or their education. Which

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224 Legislative Department, “Constitution of India.”
225 Legislative Department, “Constitution of India.”
226 Legislative Department, “Constitution of India.”
227 Legislative Department, “Constitution of India.”
228 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
229 PTI, “Hijab ban in classroom: “Supreme Court to hear pleas against Karnataka high court verdict after Holi vacation.”
230 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 113.
231 PTI, “Hijab ban in classroom: “Supreme Court to hear pleas against Karnataka high court verdict after Holi vacation.”
232 Mahapatra, “Hijab row: Hours after HC’s judgement appeals line up in apex court.”
led to students boycotting their exams because of the restriction on their ability to wear the Hijab or them being kicked out of their schools because they entered the school premises wearing the Hijab (which was against the High Court's decision). Secondly, about the Constitutional arguments about discrimination on the grounds of religion, race, caste and sex, protection of freedom of speech, protection of life and personal liberty, and freedom of conscience. This resulted in the petitioner's plea being rejected about their rights and freedoms protected under the Constitution of India. Thirdly, the argument was about whether restrictions can be put on the types of uniforms allowed to be prescribed in accordance with the Constitution of India. In which the Court noted that uniform is a reasonable restriction that is Constitutionally permissible. Lastly, the question was raised over the order dated February 5, 2022 about dress codes representation in educational institutions and who can prescribe dress codes in different schools (government, private, pre-university). Overall, The Times of India focuses on a broad range of decisions passed by the High Court of Karnataka and the significance it can potentially have on the female students' education.

**Economic Times**

Compared to Zee News and Times of India, Economic Times published 40 articles about the Karnataka Hijab ban. One of the main frames shown in the framing of the Karnataka Hijab ban is the us-versus-them frame, as 27 (67.5%) out of the 40 articles published from February 15, 222, to April 15, 2022. This is two months, and one of the main things that happened in this period was that on March 16, 2022, the decision was made by the High Court of Karnataka to uphold the ban. This shows the various parts played by different institutions, political influences, and the High Court during the phase of this issue. The Economic Times shows two main trends. Firstly is the framing of the overall issues. The victims have been female students. At the same time, the perpetrators have been the government officials and the High Court of Karnataka, who have had the power to negotiate and devise a proper solution. One article notes, “the hijab row persists in only in eight high schools and pre-university colleges of the total 75,000, the Karnataka government said on Thursday.” The article is trying to showcase that the issue of the Hijab is not a state issue but a micro level issue where the issue only exists in some schools and some demographics. The article talks about “...at…Sarala Devi College in Ballari as the parents and students staged a sit-in demonstration in front of the institution after the students with Burqa were not allowed inside....” Understanding religion is subjective to every individual, and everyone interprets it differently to each other. The sit-in demonstrates the parents’ agony in the system that once supported the Hijab, but suddenly, the government orders have changed their position. In which the students are suffering and equally their immediate families.

Similarly, another article notes, “the Karnataka government on Monday reiterated that Hijab is not an essential religious practice and said religious instruction should be kept outside the educational institutions.” There have been situations where the parents have had to advocate against the Government's decision. Another article states, “temporary ban on Hijab created more controversies in Karnataka as educational institutions opened on Monday. In Shivamogga, 13 girls refused to write an examination paper at a government school after they were told that they were not allowed to wear hijabs.” As a diverse and secular nation, India should allow children to practise their religion freely. Targeting a religious minority shows

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233 PTI, “Hijab row limited to only 8 high schools & pre-university colleges in Karnataka, says Govt.”
234 PTI, “Hijab row limited to only 8 high schools & pre-university colleges in Karnataka, says Govt.”
235 PTI, “Hijab not an essential religious practice, reiterates Karnataka Govt in HC.”
236 ET Bureau, “Hijab row: Schools in Karnataka reopen amid more controversies.”
that other religious minorities can be targeted. The pattern amongst the Economic Times' framing of the Karnataka Ban has been that the victims (the female students) have been the ones who have had to fight against the government agencies such as the Police, Politicians, and the High Court for their rights to wear the Hijab. In which the Karnataka High Court ignored their pleas and upheld the ban.

The second trend is in regards to the decisions of the High Court of Karnataka, in which out of the 40 articles 13 articles talk about the various decisions taken by the High Court of Karnataka, which led to the Hijab ban being upheld. Out of these, 12 articles have discussed the decision of the Hijab not being an essential practice within the Islamic faith. As one article notes, “...Karnataka High Court observed that the Holy Quran does not mandate the wearing of the Hijab, and stated it is a cultural practice and is used as apparel as a measure of social security. The Court said that the Quran shows concern for the cases of ‘molestation of innocent women’ and therefore, it recommended wearing of this and other apparel as a measure of social security. Maybe in the course of time, some elements of religion permeated into the practice as ordinarily.”237 One of the issues that the Court discussed is that the practice of the Hijab is not an essential practice but a cultural practice.

Furthermore, per the Holy Quran, the Hijab was used to protect innocent women from molestation and as a social security measure. Similarly, another article notes, “the high Court has ruled that the Hijab is not an essential practice in Islam. Wearing of the Hijab as a scarf does not form a part of an essential practice in Islamic faith protected under Article 25 of the Constitution, the Court ruled.”238 Firstly, the High Court upheld that wearing the Hijab is not an essential practice. Secondly, it ruled against the argument that the petitioners are allowed to practise their religion following Article 25 of the Constitution of India. The article notes, “Freedom of conscience and free profession, practice and propagation of religion.”239 Following this, the Court has struck down their argument of practising their religion with freedom of conscience (practising an individual’s beliefs without coercion). Overall, the consensus is that Economic Times has discussed the decision of the Hijab not being an essential practice, with the Court’s ruling significantly emphasised.

The second most talked about decision amongst the Economics Times framing of the decision is the decision of Prescription of Uniform as a Reasonable Restriction Constitutionally permissible. Out of the 13 articles published, 5 articles talk about this decision. As one article notes, “the prescription of school uniform is only reasonable restriction, constitutionally permissible which the students cannot object to, a three bench headed by Chief Justice Ritu Raj Awasthi…..”240 Similarly, another article notes, “notably, the Karnataka High Court today held that the prescription of uniform is a reasonable restriction that students could not object to and dismissed various petitions challenging a ban on Hijab ban on Hijab in education institutions.”241 Overarchingly, the court stated that constitutionally it is reasonable and within the Constitutional grounds for the schools, pre-university institutions, and private schools to prescribe uniforms, and this does not impede the freedoms set out within the Constitution of India, and it is permissible.

237ANI, “Hijab row: Plea moved in Supreme Court challenging Karnataka HC order.”
238ET Online, “Hijab row: Karnataka HC upholds hijab ban, rules curbs are Constitutionally permissible.”
239ET Online, “Hijab row: Karnataka HC upholds hijab ban, rules curbs are Constitutionally permissible.”
240PTI, “BJP leaders welcome K’taka HC order upholding hijab ban.”
241PTI, “Hijab essential part of Islam: Scholars; disagree with court order.”
The third most discussed decision amongst the press framing of the decision is the ‘February 5th order’. Out of the 13 articles published, 4 talks about the court’s decisions regarding whether the announcement of the order by the Karnataka Government was constitutional or unconstitutional following the Constitution of India. One article notes, “the high court has also held that the Karnataka Government order dated February 5 is not unconstitutional.” Furthermore, the court acknowledges that “no case is made out for invalidating the Government Order February 5. We are dismayed as to how all of a sudden that to in the middle of the academic term the issue of hijab is generated and blown out of the proportion by the powers that be the way the hijab imbroglio gives scope for the argument of ‘unseen hands’ are at work to engineer social unrest and disharmony.” There are two main issues. Firstly, the Karnataka government’s February 5, 2022, order was declared constitutional. Secondly, the court is impeding that there are outside hands involved in causing the unrest. However, the Hijab ban was first announced by the Karnataka government. Moreover, it was the cause for creating social unrest when female students were prohibited from entering their school grounds, and female students were harassed by males who wore saffron scarves to show their superiority. However, they supported the Hijab before the government announced banning it.

Additionally, the order stated, “...the state government had banned wearing clothes which disturb equality, integrity, and public order in schools and colleges.” The order stipulated that clothes would be prohibited, which disturbed the state’s equality, peace, integrity, and public order. Overall, on February 5, 2022, the order was highly discussed, and the court talked about the potential of outside involvement in the social unrest that occurred with the potential of terrorist personalities having an influence.

Lastly, the minor decision that was discussed in the framing of the decision in this press media was the Constitutional arguments. Only one article out of the 13 explicitly talked about the constitutional arguments made by the petitioners. As the article notes, “the bench also said the authorities prescribing uniform in schools is not violative of the fundamental rights as guaranteed under Article 19 (1)a of the Constitution and also violation of privacy under Article 21.” Petitioners argued that the Hijab ban by the Government impedes their freedoms, such as the freedom to practise their religion within a secular nation. In the Court, they said that the ban did not violate any of the freedoms and dismissed the petitions made by the female students. Overall, only one article talked about the Constitutional arguments made by the petitioners and decided that the Hijab ban does not violate any freedom within the Constitution of India.

Overall, the Economics Times’ framing of the decisions talked about four major decisions:  
1. It talked about the decision about the Hijab not being an essential practice within Islam but a cultural practice used as social security.  
2. It was about the prescription of uniforms as a reasonable restriction within the Constitution of India. The court also stated that children cannot object to the prescribed uniform, and they must adhere to the rules and regulations regarding uniforms.

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242 ET Online, “Hijab row: Karnataka HC upholds hijab ban, rules curbs are Constitutionally permissible.”  
243 ET Online, “Hijab row: Karnataka HC upholds hijab ban, rules curbs are Constitutionally permissible.”  
244 PTI, "Hijab verdict: Will try to win hearts of “misguided” Muslim girl students, says Education Minister.”  
245 ET Online, “Hijab row: Karnataka HC upholds hijab ban, rules curbs are Constitutionally permissible.”
3. February 5, 2022, an order that the government announced prohibited religious clothing such as the headscarf and saffron scarves, including any other clothing that would harm peace, equality, integrity, and public order within the schools.
4. The Constitutional argument encompassed the freedoms promised under the Constitution of India, such as the freedom to practise one’s religion.

Overall, a diverse range of decisions was discussed within the Economic Times to pick and choose to talk about the different decisions and ignore the others.

**Blame Frame**
The second most commonly used frame in the Zee News framing of the Karnataka Hijab Ban (Row) is the Blame frame. The blame frame is defined as a “narrow understanding of politics by omitting complexities of multiple causation and ignoring the roles of systems, institutions, and other political actors.” This means the blame frame focuses on the smaller picture where the critical information is ignored, such as the causes, the roles of the various institutions, and the political figures. Additionally, this “…can leave audiences with inaccurate ideas about socio-political realities and how they are developed.” With the blame frame, it is essential to acknowledge the impact framing can have, especially when it concerns social issues.

**Zee News**
Zee News published 6 articles (21.4%) out of 28 articles portraying the blame frame, showing the press blaming and downgrading the female students for wearing the Hijab in their educational institutions despite being banned. Furthermore, exam season was about to start, and bringing the Hijab as being the centre of the issue prohibited female students from entering their school premises and taking their exam, which would ultimately waste a year’s worth of education as they would not be able to attempt and pass their examples. Additionally, one article highlights the concept of terrorism and the potential linkages of female students with Al Qaeda. One article notes, “why is hijab banned inside classrooms, why not a crucifix, why not turban, why not a bindi…” This article shows and questions why the Hijab is banned, not the other articles of faith, such as the Turban (Sikh men and some women wear the turban as a head covering as an article of faith), a crucifix (a cross that Christians wear), a bindi (a dot which is worn between the eyebrows amongst Hindus, Buddhists, and Jain women). By highlighting different religious symbols and items of religious significance, it seems Zee News is trying to highlight the different minorities within India, such as Sikhs residing in Punjab, Muslims in Uttar Pradesh, and Jains in Maharashtra.

Similarly, an article links Muskaan Khan, one of the female students who defended the Hijab ban linked to terrorism just because the Al Qaeda chief praised her. Furthermore, it talks about blaming Al Qaeda for the Hijab row (the protests, conflict between classmates who supported the Hijab, and the case going to the High Court of Karnataka for evaluation. The article states, “…video statement released by Al-Qaeda chief Ayman Al Zawahiri on the Hijab row and praising student Muskaan Khan for standing in defence of headscarf and chanting ‘Allah-hu-Akbar’ proves the involvement of “unseen hands” “behind the row.” The blame for the Karnataka Hijab ban is seen to be put Al Qaeda (a “broad-based militant

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246 Armoudian, The Political Impact of Media Framing.” 176.
248 Srivastva, “What about dupatta, turban, bindi, cross’: Petitioners oppose hijab ban in Karnataka High Court.”
249 Srivastva, ““Unseen hands” behind hijab row: Karnataka Minister on al Qaeda chief Al Zawahiri praising student Muskan Khan.”
Islamist organisation founded by Osama bin Laden in the late 1980s\textsuperscript{250} and Muskaan Khan, a student and activist against the Hijab ban for enticing Al Qaeda to take a stance on the issue, which led to a video statement being released by the organisation’s Chief Ayman Al Zawahiri. Ultimately Zee News showcases the blame by blaming other minority groups while the Hijab ban issue is being heard in the High Court of Karnataka. Additionally, the notion of labelling Al Qaeda as the “unseen” hands in the Hijab row. Although the cause of the Hijab Ban (Row) has been the Government’s orders prohibiting female students from entering their Educational institutions whilst, the Educational institutions have played an equal and equivalent role in endorsing the order by the Karnataka Government. The blame on various players in the Karnataka Hijab ban has led to essential facts being ignored, particularly about the cause and role of systems, institutions, and political actors.

**The Times of India**

Like Zee News, The Times of India uses the Blame Frame significantly, with 27 (27.2\%) out of the 99 articles showcasing the frame. This does not only take part in blaming the female students for wearing the Hijab to school. However, the Government order has banned the Hijab and other issues that have developed, such as banning Muslim Traders from the Hindu Festival, Muslims Traders from selling Mangos, and the potential of banning Muslim Halal Butchers. There have been arguments that the Hijab ban has no link to the upcoming annual examinations in March and April. As one article mentions, “…CJI N V Ramana on Thursday said that exams have nothing to do with the issue - do not sensationalise (the issue).”\textsuperscript{251} The use of the word sensationalise seems to blame the victims (the female students) who have to pick and choose between their education or practising their religion.

Furthermore, the Chief Justice of the Supreme Court used the word sensationalise, stating that “…many appeals have been filed which would be listed before an appropriate bench as soon as possible.”\textsuperscript{252} To be subjective about an issue that is highly important to the students as their education is at stake shows the Supreme Court’s stance of delaying the hearing, which has underlying consequences at a macro and micro level as the current government has highlighted that one of their central policies is to get female students into education and to eradicate any social or financial barriers that may prohibit them from gaining access to education.

Similarly, “the year 10 exams began, the Karnataka Ministers said that anyone violating the High Court ruling on the hijab will not be permitted to write the exams.”\textsuperscript{253} Additionally, the Homes Minister Araga Jnanendra stated, “whoever violates the rule will face action. We will not compromise on it. Everyone should obey the high court order. Students have to remove the Hijab and write the exam.”\textsuperscript{254} This statement within the article showcases blame on the female students that if they wear the Hijab to their exams, they will not be allowed to take part in their exams. Moreover, they threatened the students that if they wore the Hijab, they would face severe consequences. It shows a police state where the Educational institutions will police all the students to obey the High Court order. The Hijab ban has been a catalyst of other issues that have arisen post the Hijab ban, such as the potential of banning Muslim Traders around the temple during Hindu festivals, Halal Meat and the ban on Muslim mango

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\textsuperscript{250}Britannica, “al-Qaeda - Islamic militant organization.”
\textsuperscript{251}Mahapatra, “Hijab and exam have no link, don’t sensationalise issue: Supreme Court.”
\textsuperscript{252}Mahapatra, “Hijab and exam have no link, don’t sensationalise issue: Supreme Court.”
\textsuperscript{253}PTI, “SSCL exams: Karnataka ministers say anyone violating the hijab inside exam centres will face action.”
\textsuperscript{254}PTI, “SSCL exams: Karnataka ministers say anyone violating the hijab inside exam centres will face action.”
traders has been discussed post the ban on the Hijab. As one article notes, “after the controversy over hijab, halal meal, a ban on Muslim traders around temples and boycott of Muslim traders had rocked the state, chief minister Basavaraj Bommai again toed a conciliatory line, saying people should “bury differences” of caste and creed.”

There are three main issues with this framing:
1. It is blaming the Karnataka Hijab ban as a controversy and as something that erupted suddenly when the cause of the ban was the Government that introduced the ban.
2. When the issue got worse, the case was taken to the High Court of Karnataka by the petitioners against the educational institutions, the Karnataka Government, and their teachers/principals who prohibited the students from entering the school grounds with the Hijab ban.
3. The Hijab ban has been used to blame and prohibit other traders from conducting their business as Muslim traders, Muslim Mango traders, and halal butchers.

Overarchingly, The Times of India uses the blame frame significantly, which showcases various blames being made out of the female students for wearing the Hijab and the other issues that have arisen which have had consequences for minorities, especially Muslims residing in Karnataka who have had their livelihood taken from them.

**Economic Times**

Similar to Zee News and Times of India Economic Times also uses the Blame Frame significantly with 13 (32.5%) out of the 40 articles which show the blame put on various actors for the situations that have happened during the ban and post the decision of the Hijab ban where the Karnataka High Court upheld the ban. That made it illegal for female students to wear their Hijab to educational institutions. One of the common trends is that school students violate orders. Then the students are published and blamed for going against the orders. “the Principal of Empress College of Tumakuru lodged a complaint with the Tumakuru City Police against 15 to 20 students for violating prohibitory orders in the last two days.”

This statement has two main issues. Firstly, it seems that by informing the police, the school Principal is blaming the students for violating orders. However, the right to practice one’s religion is fundamental in a democratic system. Secondly, lodging FIRs (Police complaints) makes the students look like a criminal when all they are doing is wearing the Hijab. However, they are not the criminals but victims of a corrupted system.

Similarly, another article notes that the Education Minister said, “...we will try to win the hearts of the ‘misguided’ Muslim girls who are against the move, and ‘bring them in the mainstream of education’.” Firstly, this blames the female students for following their religion and standing up for their religion. Secondly, “misguided Muslim girl students” shows that they are being manipulated to practice and act a certain way in the name of religion. Although following one’s religion is subjective to everyone, they can choose which aspects of their religion their views align with. Furthermore, the idea of targeting individuals based on their religion again blames them for following Islam. In which the system (High Court, the Police, and Educational Institutions) are working together to make them look like a criminal. Overall, the blame frame is used to make female Muslim students look like criminals rather than victims of the system. Furthermore, various systems work together to downgrade their religion, such as wearing the Hijab as they are called to be “misguided” to being complained to the police by a school Principal for wearing the Hijab on the school premises.

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255TNN, “Karnataka CM Basavaraj Bommai: All should unite and ensure peace.”
26ET Online, “Karnataka hijab row: FIRs lodged against students in Tumakuru.”
25PTI, “Hijab verdict: Will try to win hearts of “misguided” Muslim girl students, says Education Minister.”
Chapter 5 – Comparing the Contrasting of the different print media’s framing of the Ban and the High Court Decisions

Similarities and Differences
A few similarities and differences among the three press mediums have been heavily reported on the Karnataka Hijab Row (2022) Ban. Firstly, one of the main similarities has been that all three press mediums (Zee News, The Times of India, and Economics Times) all took a pro-government stance where they failed to acknowledge the causes and consequences of the ban on female students, such as not getting access to adequate education and ultimately having to choose between practising their religion or going to school and getting an education without wearing their Hijab. Especially since one of the main campaigns launched by Prime Minister Modi was the ‘Beti Bachao, Beti Padho’ where it was encouraged by the Prime Minister to end sexism against daughter (girls) and to get them educated so that they have a bright future. As historically Indian households have been conservative and the elders would always pray for a son to be born. As it was considered they are bread earners and those who carry the name forward of the family. This ultimately led to female feticide where if a female child was they were be killed or buried alive underground. This ultimately led girls being neglected and be considered a burden. Furthermore, by banning the Hijab within Educational institutions it shows the lack of secularism that India prides itself on. As individuals are not able to practice their religion without coercion.

Secondly, all three mediums used the same frames (us-versus-them and the blame frame) to show the superiority of the Government agencies such as the Police, Politicians, and Educational Institutions as they enforced the ban heavily. Where in any circumstances, the female students wore the headscarf (Hijab) against the orders of the Government and the orders of the High Court. They were either told to leave the school grounds or were treated like criminals, and a police complaint was laid against them. It was about the female students vs. the Government officials who decided to ban the Hijab, and following that, the High Court of Karnataka upheld the ban. For example, in Zee News, an article reported, “amid the ongoing controversy, a class VI student was allegedly barred from class in a government school in northeast Delhi’s Mustafabad for wearing a Hijab.”

Similarly, the ‘The Times of India notes that “...alleged denial of entry for girl students into schools with their headscarves on in some places, as one girl announced boycotting her exams in response to the dikhat.” It is an issue that girls have to choose between entering schools or boycotting their exams, as when the Hijab ban was announced, especially since the High Court’s verdict. The March and April period is when the exam season starts. Like the ‘Zee News and The Times of India,’ the Economic Times has used the us-versus-them as one article notes, “...at... Sarala Devi College in Ballari as the parents and students staged a sit-in demonstration in front of the Institutions after the students with Burqa were not allowed inside.” There has been a constant back and forth with the Government agencies, the

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258Zee Media Bureau, “Hijab Row reaches Delhi, Class VI student barred from class in Mustafabad.”
259Times of India, “Burqa-Clad girl asked to remove hijab, boycotts exam in Karnataka.”
260PTI, “Hijab row limited to only 8 high schools & pre-university colleges in Karnataka, says Govt.”
female students, and their parents who have to fight for their rights protected under the Constitution but not guaranteed or upheld by the Government agencies.

Lastly, all three press mediums talked extensively about the High Court decisions, where they acknowledged the most talked about decisions. At the same time, the press media outlets ignored the least popular decisions. This shows that the press can pick and choose what they talk about and how they get the message across about the Hijab being banned within Educational Institutions. One of the most popular decisions discussed was that the High Court declared that wearing the Hijab is not an essential religious practice but a cultural practice that is subjective and different amongst each individual and community. There has been disagreement amongst the female students who have argued that some of them have been wearing the Hijab since childhood.

Moreover, asking them to remove the Hijab while entering their Educational Institutions violates their right to practise their religion. Although various arguments were made, the High Court of Karnataka stated that wearing the Hijab is not an essential religious practice within the Islamic faith. This argument was the most talked about decision amongst the ‘Zee News, The Times of India, and Economic Times.

**Differences**

While there are similarities among the press mediums, there are also significant differences. There has been one main difference. That is the amount of coverage these press mediums do about the Karnataka Hijab Row (Ban). Zee News published a total of 28 articles. At the same time, The Times of India published a total of 99 articles. Lastly, Economic Times published a total of 40 articles. This ultimately shows that the subject of national significance has had varied coverage amongst different press mediums. Where they ultimately got to choose what they covered and did not cover. Zee News, for example, had the least coverage, while The Times of India had the most coverage. But all these newspapers have taken a pro-government stance while talking about the issue and failing to acknowledge the causes and consequences. When big corporations control the press media's publication, they ultimately have a say in what can and cannot be published. This, therefore, ignores the main issue, and all the small issues are published to gain their reader's interest. Overall, the main difference among the press media has been the amount of coverage they have given to the Karnataka Hijab Row (Ban), which was an issue of national significance as India has one of the largest Muslim populations residing in various states which follow Islam.

**Discrepancies amongst the Decisions by different Press Media**

All three press mediums talked about different decisions and had various decisions to cover, which ranged across the spectrum.

Firstly, ‘Zee News’ talked about only two decisions in their coverage of the High Court decisions. Firstly was the decision of the Hijab not being an essential religious practice within Islam. Seven articles (amongst the 28 articles published by Zee News) were discussed by the three judge bench who stated, “...we are of the considered view that the prescription of school uniform is only a reasonable restriction constitutionally permissible which the students
cannot object to.” What this means is that ultimately the Court declared that due to Hijab not being an essential practice, therefore, the petitions were dismissed. The second most discussed decision was the argument that “the prescription of school uniform is a reasonable restriction which students could not object to, the Karnataka High Court said while pronouncing its judgement in Hijab row....” Out of the 28 articles, seven talked about this decision, which ultimately showed that the schools, including Pre-university and private schools, can prescribe uniforms, and it is constitutionally permissible. The last decision Zee News discussed was on February 5, 2022, within the order ‘it does not prescribe any form of dress code but it only provides for prescription in different types of educational institutions.” Only two articles talked about the validity of the order, where the petitioners argued that the order was issued hastily without any consultation.

Whilst ‘Zee News' talks about the three decisions, it does show discrepancies between what is discussed and what is ignored. Out of the eight overarching decisions, five decisions have been ignored. These include the Constitutional arguments of “as to Prescription of School Uniforms to the Exclusion of Hijab Violates Articles, 14, 15, 91(1)(a) & 21,” “conceding Hijab on the Principle of Reasonable Accommodation,” “as to the validity of Government circular Date 31.1.2014 Concerning School Betterment (Development) Committees,” the “International Conventions And Emancipation of Women” policy, and lastly, “the Public Interest Litigation.” Despite the three most popular arguments being highlighted, the Zee News press media has ignored the other five decisions, which ultimately shows the most popular decisions make the news. In contrast, the others are left out completely from the media coverage.

Secondly, ‘The Times of India discusses four of the eight decisions that the High Court adjudicated, which ultimately led to the Karnataka Hijab Ban being upheld. Firstly, it is one of the most talked about decisions. Thirteen articles in the ‘The Times of India’ mentioned this High Court decision of the “pleadings and proof as to Essential Religious practice.” This is the decision about whether wearing the Hijab is an essential practice within Islam or cultural practice. Two of the following decisions have an equal number of articles that discuss the following decisions. Firstly are the constitutional arguments. The question is “As to Prescription of School Uniforms to the Exclusion of Hijab Violates Articles, 14, 15, 91(1)(a) & 21.” This argument is about whether the exclusion of the Hijab violates Article 14 (“Equality before the law”), 15 (“Prohibition of discrimination on the grounds of religion, race, caste, sex or place of birth”), Article 19 (“protection of certain rights

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261 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
262 Srivastava, “Wearing of the Hijab not an essential practice of Islam, Says Karnataka High Court.”
263 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 113.
264 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 95.
265 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 106.
266 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 109.
267 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 122.
268 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 127.
269 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 85.
270 High Court of Karnataka, Smt Resham and Another vs. State of Karnataka and Others, 95.
271 Legislative Department, “Constitution of India.”
272 Legislative Department, “Constitution of India.”
regarding freedom of speech.”

In which the overall decision was that the schools could prescribe uniforms and it does not violate the Constitution of India. The third decision is about “as to School Discipline & Uniform and Power to prescribe the same: - Question of Whether there is the power to prescribe dress in education institutions.” This means whether the school institutions have the right to prescribe uniforms. Overarching, two articles talk about these decisions and where the High Court of Karnataka explicitly states that High schools can prescribe uniforms and the prescription of uniforms does not go against the Constitution. Lastly, the decision of ‘validity of the Government order February 5, 2022, which provides the representation of dress codes in schools and educational facilities.’ Ultimately, three articles talked about this decision out of the thirteen articles published regarding the Karnataka High Court decisions regarding the Hijab ban.

Overall, four of the eight decisions were discussed and discussed, showcasing the diversity of representation of the decisions taken by the High Court. In which the following four were ignored. Firstly, the “Conceding Hijab on the Principle of Reasonable Accommodation.” Secondly, ‘the validity of the Government order dated January 31, 2014 about the Betterment (Development Committees.” Thirdly, the policy concerning the “International Conventions and Emancipation of Women.” Lastly, the “The Public Interest Litigation.” Overall these four decisions were not discussed at all by ‘The Times of India’ Newspaper. All of these decisions were ignored when ‘The Times of India’ informed the public about the High Court ruling regarding the Hijab Ban.

Lastly, similar to ‘The Times of India ‘The Economic Times’ also talked about only four of the eight decisions that the High Court of Karnataka took. Firstly, the most discussed was the decision about the ‘essential practice’ and whether wearing Hijab is an essential practice within Islam. In which the Court stated that wearing the Hijab is not mandatory in a religious context. Therefore, it was declared to be a non-essential practice. A total of twelve articles talked about these decisions, and it was one of the most highly discussed decisions in the ‘Economic Times’ newspaper. Secondly, is the prescription of uniform as a reasonable restriction. It was argued by petitioners whether or not the school can prescribe uniform and whether or not it is constitutionally permissible (allowed). The High Court prescription uniform is allowed and is one of the rare aspects within the Constitutionally that is legally permitted. Five articles discussed this decision and the Court’s verdict on the petitioner’s questions. The third decision that was talked about was regarding the rights that are promised within the Constitution. In which one article talked about the decision taken by the Court which the Court said that prescribing uniform does not violate the Constitutional rights promised in the Constitution of India. Lastly, is the February 5, 2022 order by the State Government which asked the students to only wear uniform prescribed by the Government or the school management. And the Court ruled that the order was by no means invalid. Overall,
four out of the eight decisions were discussed amongst the ‘Economic Times’ press media, in which the other four were completely ignored.

To summarise, there are two main conclusions. Firstly, all three press mediums had various similarities and differences, showcasing how similar these newspapers are and how they frame the issue. Ultimately this shows the press media’s ability to include and ignore facts and information important to the public. Secondly, the discrepancies amongst the different press mediums were prevalent, where only the popular decisions were published by the press mediums, and the least popular decisions were completely ignored. The essential practices decision, Constitutional arguments, prescription of uniform as a reasonable restriction, and the February 5, 2022 order were consistently published across all three press mediums. Noelle-Neumann notes that ‘one opinion and perspective dominates the coverage in the public scene whilst the least dominated perspective is eradicated from the public eye and awareness.’ Although this is not an opinion, the least dominated decisions were not mentioned once amongst all three press mediums, which, therefore, were completely ignored and disappeared from the public eye.

Chapter 6 – Conclusion

To conclude, there are two main conclusions. Firstly, all three press mediums had various similarities and differences, showcasing how similar these newspapers are and how they frame the issue. Ultimately this shows the press media’s ability to include and ignore facts and information essential to the public. Secondly, the discrepancies amongst the different press mediums were prevalent, where only the popular decisions were published by the press mediums, and the least popular decisions were ignored entirely. The essential practices decision, Constitutional arguments, prescription of uniform as a reasonable restriction, and the February 5, 2022 order were consistently published across all three press mediums. Noelle-Neumann notes that ‘one opinion and perspective dominates the coverage in the public scene whilst the least dominated perspective is eradicated from the public eye and awareness.’ Although this is not an opinion, the least dominated decisions were not mentioned once amongst all three press mediums, which, therefore, were completely ignored and disappeared from the public eye.

Secondly, the hypothesis of the Court’s decisions will be based on the Constitution of India and cite the “The Karnataka Education Act 1893.” I was correct on the judgment of the Constitution of India to was cited. However, the overarching decision about the Constitution regarded the permissibility of uniforms as a reasonable restriction that was constitutionally permissible as the Court stated that schools are allowed to prescribe uniforms where the students cannot say no to wearing the uniform that the school prescribes. Additionally, in conjunction with this hypothesis, I also stated that a decision would be made on whether or not the Hijab should be worn by female students when attending Government run schools. The High Court decided that the Hijab ban was upheld, where the wearing of the Hijab within the schools of Karnataka would be illegal and banned.

The third hypothesis that I predicted was that the legal reasoning given by the High Court of Karnataka would strike down the arguments of the petitioners who cited the Constitution of

281 Noelle-Neumann, The Spiral of Science: Public Opinion, Our Social Skin, 5.
India. The petitioner's arguments were not considered and were struck down by the High Court, such as the freedom to practice one's religion. The court invalidated their arguments without giving any proper reasoning or justification. Also, no compassion was shown for their faith, and the reasons why female students wore the Hijab were utterly disregarded, as the court stated that wearing the Hijab (headscarf) is not an essential practice within Islam. I also predicted that press media sources would take a completely different angle rather than a holistic view. In which the various press media only repeated the decisions that were taken and did not offer their perspective on the decisions that were taken. This shows that partially my third hypothesis was correct. At the same time, the press media only mentioned the decisions that were taken and did not offer commentary on whether the decision was right or wrong.

Lastly, the last hypothesis I predicted was that there would be discrepancies among the different press mediums. In which different mediums did focus on different decisions. Some press media focused on four decisions, while others only mentioned three. Only the popular or most discussed decisions were discussed, while the others were completely ignored. Overall, the discrepancies were prevalent, showing the media’s ability to pick and choose what they talk about and ignore.

The second aspect is that my research findings show that the us-versus-them and the blame frame were the most prevalent amongst the press media (Zee News, The Times of India, and Economic Times. Both mediums show similarities and differences. Some similarities include portraying the female students as criminals for wearing the Hijab, failing to acknowledge the causes of why this issue occurred in the first place and the consequences the High Court decision will have on these female students. They would have to choose between practising their religion or going to school. These examples, in conjunction with the framing, show the media’s ability to ignore the social issues that may arise from the issue when it reports on issues of public interest. There are also significant differences. One of the mean ones is that the three mediums had a diverse range of reporting done. The Times of India’ reported the issue most, while Zee News did the least. Evidence shows that different media have different agendas where they can have significant influence from their stakeholders (elites) to decide what is published and how it is published. Ultimately it does seem that a pro-government stance was taken on the issue where the most important facts were ignored and the least important were published. The mediums failed to acknowledge the female students as being the victims rather than the criminals.

The significance of my research is that it showed a contrast between the three print mediums and the overall framing of the issue and discrepancies present amongst the different mediums when they reported on the decisions of the High Court of Karnataka. Additionally, there has been little research done about the Karnataka Hijab Ban as it is a new issue that arose in December 2021 and carried on until March 2022 when the High Court of Karnataka presented its decision. Due to the dissatisfaction with the decision, the matter was then taken to the Supreme Court of India to decide on the issue. Nelson, Clawson, and Oxley make a very important point that “frames can exert appreciable influence on citizens’ perception on the issue.” When media sources publish an article or report on an issue, it can have a significant influence on the way they perceive the issue, especially when the issue is very personal to a group or an individual who is well-educated on the issue of concern. The significance of my research is that not only did I look at the overall framing of the Karnataka Hijab ban, but the discrepancies present amongst the decisions reported on amongst the three press mediums, which showed various different similarities and differences.
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