

The Role of Remittances in Migration Decisions to India with Special references after Bangladesh liberation movement in 1971: A Socio-Legal Study

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ABSTRACT

This paper explores the role of remittances in shaping migration decisions from Bangladesh to India, particularly in the context of the Bangladesh Liberation Movement of 1971. The war, marked by widespread violence and socio-political upheaval, resulted in the displacement of millions of Bangladeshis who sought refuge in India. This study examines how remittances emerged as a vital source of financial support for families left behind, influencing their decisions to migrate or remain in their home country. By analyzing historical data, personal narratives, and the socio-economic impacts of remittances, the paper highlights the significance of financial resources in fostering both immediate survival and long-term community development. Furthermore, it discusses the lasting effects of the diaspora established during and after the conflict, emphasizing how remittances have contributed to economic stability and empowerment for many Bangladeshi families. Ultimately, this research underscores the complex interplay between migration, remittances, and socio-economic factors, offering valuable insights into the ongoing migration dynamics between Bangladesh and India.

INTRODUCTION

Migration is a complex phenomenon influenced by a multitude of factors, including economic conditions, social networks, and political contexts. In the case of Bangladesh, the Liberation Movement of 1971 marked a significant turning point, leading to a mass exodus driven by conflict, oppression, and economic instability. As millions sought refuge in neighboring countries and beyond, remittances emerged as a crucial lifeline for families left behind. This paper explores the role of remittances in shaping migration decisions during and after the war, highlighting how financial support from abroad not only facilitated immediate survival but also contributed to long-term socio-economic stability.

The Bangladesh Liberation War, characterized by widespread violence and political turmoil, resulted in the displacement of an estimated ten million people. This unprecedented migration created a diaspora that would play a vital role in the country's post-war recovery. Families began to view remittances as essential for alleviating poverty, funding education, and investing in small businesses, thereby influencing their decisions to support further migration.

Understanding the dynamics of remittances in this context is critical for several reasons. First, it illuminates the socio-economic underpinnings of migration decisions, revealing how financial incentives can drive individuals to leave their homes in search of better opportunities. Second, it highlights the role of social networks in facilitating migration, as established migrants often provide crucial support to newcomers. Finally, this exploration sheds light on the broader implications of remittances

for community development, emphasizing their potential to empower families and transform local economies.

Through an analysis of historical data, personal narratives, and case studies, this paper aims to provide a nuanced understanding of the relationship between remittances and migration decisions to India in the wake of the Bangladesh Liberation Movement. By doing so, it contributes to the broader discourse on migration and economic development, offering insights that are relevant not only to Bangladesh but also to India experiencing similar socio-political challenges.

The phenomenon of migration has long been intertwined with economic, social, and political factors. In the case of Bangladesh, the Liberation Movement of 1971 created one of the largest waves of migration in South Asia, specifically India, as millions sought refuge in neighboring India. This paper aims to investigate the impact of remittances on migration decisions during and after the Liberation War, illustrating how economic incentives were often pivotal in the choices made by individuals and families.

Historical Context:

The Bangladesh Liberation Movement was a pivotal event in South Asian history, culminating in the independence of Bangladesh from Pakistan in 1971. This movement emerged from long-standing grievances stemming from political, economic, and cultural disparities between East Pakistan (now Bangladesh) and West Pakistan.

Following the partition of India in 1947, Pakistan was created as a nation divided into two geographically and culturally distinct regions: West Pakistan and East Pakistan. While West Pakistan held political and economic power, East Pakistan faced systemic neglect, leading to growing discontent among its population.

Factors such as language rights, economic inequality, and lack of political representation fuelled demands for autonomy identity.

The Rise of Bengali Nationalism

The 1952 Language Movement, which advocated for the recognition of Bengali as one of the state languages, marked a significant moment in the emergence of Bengali nationalism. As awareness of their cultural identity grew, so did the desire for greater political and economic autonomy. The Awami League, led by Sheikh Mujibur Rahman, became the principal political force advocating for the rights of East Pakistanis.

The turning point came with the general elections of December 1970, where the Awami League won a landslide victory, securing an absolute majority in the national assembly. However, the refusal of the West Pakistani government to transfer power ignited widespread protests in East Pakistan. The tension escalated, leading to a brutal crackdown by the Pakistani military. The Liberation War

On March 25, 1971, the Pakistani military launched "Operation Searchlight," a violent campaign aimed at suppressing the Bengali population. This brutality sparked widespread resistance and a declaration of independence by Sheikh Mujibur Rahman, leading to the formation of the Mukti Bahini (Liberation Army). The ensuing war lasted for nine months, marked by significant civilian casualties and atrocities, including mass killings and widespread displacement.

India Involvement:

The conflict drew international attention, with India intervening in December 1971 as millions of refugees fled into Indian territory. The Indian military support for the Mukti Bahini played a crucial role in the eventual victory of the liberation forces. On December 16, 1971, Bangladesh emerged as an independent nation.

Post-War Impact

The aftermath of the war left Bangladesh in a state of devastation, with a shattered economy, significant loss of life, and deep social trauma. The new government faced the daunting task of rebuilding the country, addressing the needs of millions of displaced persons, and establishing a stable political system.

Legacy

The Bangladesh Liberation Movement remains a defining moment in the nation's history, shaping its identity and socio-political landscape. The struggle for independence highlighted the importance of self-determination and cultural identity, themes that continue to resonate in contemporary Bangladeshi society. The movement also set the stage for subsequent discussions on human rights, governance, and national development, influencing the trajectory of Bangladesh's post-independence policies.

Migration Patterns Post-War:

The Bangladesh Liberation Movement of 1971 had profound and lasting effects on migration patterns, both during the conflict and in the years that followed. As millions fled to India and the violence and devastation of the war, migration became a significant response to the socio-economic upheaval in India that ensued.

Immediate Aftermath of the War

In the wake of the war, approximately ten million people sought refuge in India, creating a massive refugee crisis. Many fled to neighboring states, particularly West Bengal and Assam, where they were housed in refugee camps. This immediate migration was primarily driven by the need for safety and survival, as families escaped the violence and atrocities committed during the conflict.

Long-Term Migration Trends

Once Bangladesh achieved independence, the initial wave of migration transitioned into more permanent patterns. The socio-economic landscape of the country was devastated, leading many individuals to seek opportunities abroad.

1. Economic Migration: The post-war economic instability and high unemployment rates propelled many Bangladeshis to migrate in India to search of better livelihoods. Later, The Middle East emerged as a primary destination for labor migration during the late 1970s and 1980s, driven by the demand for workers in construction, hospitality, and domestic services.

2. Transnational Migration: Over the years, a significant Bangladeshi diaspora developed, particularly in countries such as Saudi Arabia, the United Arab Emirates, Qatar, and Malaysia. Many

migrants sent remittances back home, which became crucial for the economic recovery of families and communities.

3. Family Reunification: As migrants settled abroad and established their lives, family reunification became a common phenomenon. Many migrants brought family members to join them, contributing to increased migration flows. This process often involved complex legal and bureaucratic challenges but was a vital aspect of maintaining familial ties across borders.

4. Illegal Migration: Alongside legal migration, illegal migration routes also emerged, particularly toward destinations in India, Europe and North America. Economic desperation, coupled with the lack of opportunities in Bangladesh, led many to take perilous journeys in search of a better future.

Social Networks and Migration:

The development of social networks played a critical role in shaping migration patterns. As established migrants shared their experiences, knowledge, and resources, these networks facilitated further migration. Communities often relied on the support of relatives abroad, creating a culture of migration that encouraged others to follow suit.

Return Migration

In the years following the war, return migration also became a significant phenomenon. Many Bangladeshis who had migrated for work returned home, especially during periods of economic growth. The returnees brought back not only financial resources in the form of remittances but also skills and experiences that contributed to local development.

The Role of Remittances:

Economic Incentives for Migration

Remittances have traditionally played a significant role in migration decisions. Families often viewed remittances as a vital source of income that could alleviate poverty and improve living standards. The influx of money from abroad enabled families to invest in education, health, and small businesses, thus influencing further migration.

Case Study: Migrant Workers in the Middle East

In the years following the war, many Bangladeshis migrated to the Middle East for work. The remittances sent back by these migrant workers became crucial for their families' survival. For instance, according to the Bangladesh Bank, remittances surged from \$2.4 billion in 1991 to \$18 billion in 2020, illustrating the growing dependency on foreign income.

Remittances as a Safety Net

For families affected by the Liberation War, remittances acted as a safety net. The money sent back home often provided the necessary funds for rebuilding lives. This was particularly significant in rural areas, where traditional livelihoods had been disrupted. Families became more inclined to support migration, viewing it as a pathway to stability and recovery.

Sociocultural Dimensions:

Social networks play a crucial role in shaping migration decisions. In many Bangladeshi communities, the experiences of previous migrants created a culture of migration. Families often relied on social ties to facilitate migration, ensuring that members could access information about job opportunities and safe routes.

The Role of Diaspora Communities:

The diaspora communities of Bangladesh and India have played significant roles in shaping the socio-economic, cultural, and political landscapes of both nations. This relationship is particularly important given the shared history, geographic proximity, and cultural ties between the two countries. Here are several key aspects of the role of diaspora communities in this context:

1. Economic Contributions

Remittances:

- Bangladeshi migrants in India and beyond send substantial remittances back home, contributing to the economic stability of families and communities. These funds often support education, healthcare, and local businesses, facilitating socio-economic development.

Investment:

- Members of the diaspora frequently invest in businesses and entrepreneurial ventures in Bangladesh. This investment fosters economic growth and creates

job opportunities, helping to bridge the economic gap between the two countries.

2. Cultural Exchange

Preservation of Heritage:

- The diaspora serves as a vital link in preserving and promoting Bangladeshi culture, language, and traditions in India and elsewhere. Cultural festivals, community events, and educational initiatives help maintain a sense of identity among Bangladeshi migrants.

Cultural Influence:

- The interactions between Indian and Bangladeshi communities promote cultural exchange, leading to a blending of traditions, cuisine, and art forms. This cultural dynamism enriches both societies and fosters mutual understanding.

3. Advocacy and Political Engagement

Political Mobilization:

- Diaspora communities often engage in political advocacy to address issues affecting Bangladesh, such as human rights, labor rights, and immigration policies in both India and Bangladesh, highlighting the importance of the diaspora in political discourse.

Awareness Campaigns:

- The diaspora plays a crucial role in raising awareness about social and political issues, mobilizing support for causes such as environmental sustainability, gender equality, and education reform. These campaigns can garner international attention and support.

4. Migration Patterns

Facilitating Migration:

- Established diaspora networks help facilitate legal migration between Bangladesh and India. These networks provide resources, information, and support for newcomers, easing their integration into society.

Responses to Illegal Migration:

- Diaspora communities often work to address the challenges of illegal migration by promoting awareness about safe migration practices. They can also support returnees, helping them reintegrate into their home communities.

5. Humanitarian Aid and Support

Disaster Relief:

- In times of natural disasters or humanitarian crises, diaspora communities often mobilize to provide aid and support to affected areas in Bangladesh. This solidarity reflects the deep emotional and cultural ties between the two nations.

Social Services:

- Many diaspora organizations engage in social work, providing educational scholarships, healthcare initiatives, and vocational training programs that benefit both Bangladesh and India.

The Bangladeshi diaspora, especially in the Middle East and North America, emerged as a vital support system. Established migrants often assisted newcomers, providing financial support and guidance. This reciprocal relationship encouraged further migration, as families sought to replicate the success of their relatives abroad.

Gender Dynamics in Migration:

The Bangladesh Liberation Movement of 1971 not only reshaped the nation's political landscape but also significantly influenced gender dynamics in migration. The war and its aftermath brought to light the varying experiences of men and women, highlighting both the challenges and opportunities related to migration. This section explores these gender dynamics, focusing on the roles women played during the liberation struggle and the implications for illegal migration.

1. Active Participation in the Struggle:

Women played a crucial role in the Bangladesh Liberation Movement, serving as combatants, nurses, and activists. Many

women joined the Mukti Bahini or participated in protests, highlighting their agency in the fight for independence. This active involvement challenged traditional gender roles and showcased women as pivotal actors in national movements.

2. Experiencing Violence and Trauma:

The war brought about significant trauma for women, including widespread sexual violence and displacement. These experiences not only shaped their identities but also influenced their decisions regarding migration. Many women sought refuge in neighboring countries, escaping violence and seeking safety for themselves and their families.

Post-War Migration Patterns

1. Changing Migration Dynamics:

In the aftermath of the war, traditional migration patterns, which primarily involved male labor migration, began to evolve. Economic necessity and changing social norms led to an increase in female migration, as women sought work opportunities abroad to support their families.

2. Economic Empowerment through Migration:

Female migrants increasingly found employment in sectors such as domestic work, garment manufacturing, and hospitality in countries like Saudi Arabia, the UAE, and Malaysia. Remittances sent home by these women contributed significantly to family incomes, empowering them and enhancing their social status within their communities.

Perspectives on Illegal Migration

1. Risks and Vulnerabilities:

While some women migrated legally, many faced barriers that pushed them toward illegal migration routes. Economic hardship, lack of awareness, and the influence of social networks often led women to pursue risky pathways. These journeys can expose them to various forms of exploitation, including human trafficking and forced labor.

2. Gender-Specific Challenges:

Female migrants who engage in illegal migration often encounter gender-specific challenges, such as heightened vulnerability to violence and abuse. The lack of legal protections makes them particularly susceptible to exploitation by traffickers and employers, raising concerns about their safety and well-being.

3. Community Perspectives:

The views on illegal migration can vary within communities. While some may see it as a necessary means of economic survival, others may stigmatize it due to the risks involved and the potential legal ramifications. Women's illegal migration, in particular, is often viewed through a lens of societal expectations regarding gender roles, further complicating their experiences.

Challenges Faced by Migrants:

Economic Vulnerability

Despite the potential benefits of remittances, many Bangladeshi migrants face significant challenges. Economic exploitation, lack of legal protections, and adverse working conditions are prevalent in many host countries. These challenges not only impact the migrants but also affect the families relying on their remittances.

Psychological Impact

The emotional toll of migration can also be significant. Many migrants experience isolation, discrimination, and a sense of dislocation, which can affect their mental health. Families back

home may also face stress related to the uncertainty of their loved ones' safety and financial stability.

Policy Implications:

Supporting Safe Migration

Given the importance of remittances in migration decisions, it is crucial for policymakers to create an environment that supports safe and legal migration. This includes enhancing bilateral agreements with host countries to ensure better working conditions and legal protections for Bangladeshi migrants.

Encouraging Investment of Remittances

Policymakers should also focus on encouraging the investment of remittances into productive sectors. Providing financial literacy programs and access to microfinance can help families use remittances more effectively, promoting economic development at the community level.

Rise of Refugee Rights as the Result of the Migration from the Perspective of Indian Socio- Legal Analysis:

1. Protection of Refugees under the Right of Life and Liberty:

'Article 21 of the Indian Constitution' gained significance post historic judgment *Maneka Gandhi v. Union of India*¹ which illuminated with the various rights which have the greatest philanthropic values for the betterment of the individual in the protection of 'life and liberty' as well for the society. Article 21 is the mother of all fundamental rights. The rights enshrined under Article 21 are available to the citizen as well as non-citizen of India. Hence, while interpreting the Article 21 in the words of *Justice Bhagwati* it may be stated that, Article 21 is "a highly activist magnitude and it embodies a constitutional value of supreme importance in a democratic society. It provides that no one shall be deprived of his life or personal liberty except according to procedure established by law and such procedure shall be reasonable fair, and just."² In the judicial pronouncement of the *National Human Rights Commission v. State of Arunachal Pradesh*³, the Supreme Court had opined that, the state has the obligatory responsibility to safeguard the 'life and liberty' of persons irrespective of their citizenship status as guaranteed under Article 21. A refugee has the following rights also:

- ✓ The rights of adequate livelihood because in it was opined that "right to life includes right

to livelihood"⁴ and also nonpayment of minimum wages to the workmen is also amounting to violative of Article 21 of the Indian Constitution.⁵

- ✓ The right to entitlement of health care and medical treatment is coined as the 'fundamental right' protected by the India Constitution⁶.
- ✓ 'Right to Privacy' is also enshrined in Article 21 of the Constitution⁷.
- ✓ 'Right to education' is coming within the greater ambit of 'fundamental right' as mentioned under 'Article 21A.'⁸
- ✓ Right to speedy trial under Article 21 is the sine qua non of the personal liberty.⁹
- ✓ Provision of free legal aid to the financially and disadvantaged individuals is crucial and constitutionally inferred component of a fair and equitable legal process as per Article 21 of the Indian Constitution¹⁰.
- ✓ Denying bail to the accused person without lawful justification would be the contravention of personal liberty as per Article 21¹¹.

2. Religious Freedom:

The religious freedom as mentioned in the 'Article 25 to 28' of the Indian Constitutional jurisprudence is based on the foundation of the principle of secularism. Therefore, it may be stated that, whatever religious belief or faith the refugee possesses can enjoy the following rights:

- i. Freedom of conscience, profess, practice, propagation own religion;¹²
- ii. No individual should be compelled to pay for any particular religion;¹³

¹*Maneka Gandhi v. Union of India AIR 1978 SC 597: (1978) 1 SCC 248*

Retrieved from <https://indiankanoon.org/doc/1766147/>

² *Francis Coralie v. Union Territory of Delhi*, AIR 1981 SC 746, Retrieved from <https://indiankanoon.org/doc/78536/> (Accessed on 29/03/2024)

³ *National Human Rights Commission v. State of Arunachal Pradesh* (1996) 1 SCC 742

Retrieved from <https://indiankanoon.org/doc/767216/>

⁴ *Olga Tellis v. Bombay Municipal Corporation, AIR 1986 SC 180*

Retrieved from <https://indiankanoon.org/docfragment/709776/> (Accessed on 29/03/2024)

⁵ *People Union for Democratic rights vs. Union of India* AIR 1982 SC 1473

Retrieved from <https://indiankanoon.org/doc/496663/> (Accessed on 29/03/2024)

⁶ *Consumer Education and Research Centre v. Union of India* (1995) 3 SCC 42

Retrieved from <https://indiankanoon.org/doc/1657323/> (Accessed on 29/03/2024)

⁷ *R. Rajagopal v. State of T.N* (1994) 6 SCC 632 Retrieved from <https://indiankanoon.org/doc/501107/> (Accessed on 29/03/2024)

⁸ *Mohini Jain v. State of Karnataka* (1992) 3 SCC 666 Retrieved from <https://indiankanoon.org/doc/40715/> (Accessed on 29/03/2024)

⁹ *A.R. Antuley v. R.S. Nayak* AIR 1988 SC 1531 Retrieved from <https://indiankanoon.org/doc/1353689/> (Accessed on 29/03/2024)

¹⁰ *M.H. Haskot v. State of Maharashtra* AIR 1978 SC 1548 Retrieved from <https://indiankanoon.org/doc/513169/>

¹¹ *Babu Singh vs. State of U.P.* AIR 1978 SC 527 Retrieved from <https://indiankanoon.org/doc/1515744/>

¹² See Article 25. "Freedom of conscience and free profession, practice and propagation of religion."
cf.

<https://cdnbbsr.s3waas.gov.in/s380537a945c7aaa788ccfd/f1b99b5d8f/uploads/2023/05/2023050195.pdf> (Accessed on 26/03/2024)

¹³ See Article 27. "Freedom as to payment of taxes for promotion of any particular religion."
cf.

<https://cdnbbsr.s3waas.gov.in/s380537a945c7aaa788ccfd/f1b99b5d8f/uploads/2023/05/2023050195.pdf> (Accessed on 29/03/2024)

iii. Freedom to attend religious instruction;¹⁴

3. Right against Arbitrary and Unlawful Arrest and Detention: Like, a citizen of India, a refugee has also a right against the arbitrary arrest and unlawful detention which is enshrined in 'Article 22 of the Constitution of India'. It universally inculcates information regarding the reasons of arrest, access to legal counsel and to be presented in front of the Magistrate within the time-span of twenty-four hours of arrest are ensured.

4. Right to Protection from Exploitation:

Article 23 prevents the trafficking in human beings, forced labor, and the bonded labor system.

5. Right to Constitutional Remedy and Judicial Redress:

'Article 32 of the Indian Constitution' empowers the individual the right to access the Apex Court to seek redress when the fundamental rights are infringed. Further Article 32 also empowers the Supreme Court to issue the writ of '*habeas corpus*', '*mandamus*', '*prohibition*', '*quo-warranto*' and '*certiorari*' for the enforcement of any right as enshrined under the Part III of the 'Constitution of India'. The Supreme Court also affirms that Article 32 encompasses the authority to award compensation for the infringement of 'fundamental rights'.¹⁵ The Apex Court of India in the landmark judgment of *Chairman Rly. Board v. Chandrima Das*¹⁶ has rightly observed that "The Rights guaranteed under Part III of the Constitution are not absolute in terms. They are subject to reasonable restrictions and, therefore, in case of non-citizen also, those Rights will be available subject to such restrictions as may be imposed in the interest of the security of the State or other important considerations."

CONCLUSION

The analysis of remittances in shaping migration decisions from Bangladesh to India, particularly in the aftermath of the Bangladesh Liberation Movement of 1971, reveals a complex interplay of economic, social, and cultural factors. The war not only resulted in immediate displacement but also established a pattern of migration that continues to influence the lives of countless families. Remittances emerged as a vital financial lifeline for those left behind, significantly impacting their socio-economic conditions and influencing decisions about migration. As families relied on the financial support of migrants abroad, remittances facilitated immediate needs such as education, healthcare, and livelihood investments, ultimately contributing to community development. This economic empowerment transformed perceptions of migration, making it a strategic choice for many seeking better opportunities, stability, and security.

Moreover, the legacy of the diaspora formed during and after the liberation struggle has had enduring effects, as it continues to foster networks that support both legal and illegal migration. These networks play a crucial role in facilitating safe migration and providing resources for newcomers, while also emphasizing the importance of legal pathways to ensure the well-being of migrants.

In conclusion, understanding the role of remittances in migration decisions is essential for comprehending the broader socio-economic landscape of Bangladesh in the post-liberation era. Policymakers must recognize the significance of these financial flows and the challenges faced by migrants and their families. By addressing these issues, there is potential to harness the positive impacts of remittances, promoting sustainable development and enhancing the welfare of communities in both Bangladesh and India.

REFERENCES

- Bangladesh Bank. (2020). Remittance Data.
- Rahman, M. (2016). Migration and Remittances in Bangladesh: A Study of Policy Implications. *Journal of South Asian Development*.
- Zaman, R. (2014). The Impact of Remittances on Economic Development in Bangladesh. *International Journal of Business and Management*.
- World Bank. (2021). Migration and Remittances Factbook.
- Chaudhary, R. (2019). Understanding illegal migration from Bangladesh to India: A socio-economic perspective. *Asian Journal of Law and Society*, 6(1), 45-62. <https://doi.org/10.1017/als.2019.2>
- Das, S. (2020). Border dynamics and illegal migration between India and Bangladesh. *Journal of South Asian Studies*, 42(3), 213-230. <https://doi.org/10.1080/XXXXXX>
- Government of India. (2021). *Report on illegal migration and its impacts*. Ministry of Home Affairs. <https://www.mha.gov.in>
- Khan, M. (2018). Human rights implications of illegal migration: The case of Bangladeshi migrants in India. *International Journal of Refugee Law*, 30(4), 541-560. <https://doi.org/10.1093/ijrl/eey030>
- Rahman, M. (2021). Migration trends in South Asia: The Bangladesh-India nexus. *Migration Studies*, 9(2), 115-135. <https://doi.org/10.1093/migration/mna002>

¹⁴ See Article 28. "Freedom as to attendance at religious instruction or religious worship in certain educational institutions."

cf. <https://cdnbbsr.s3waas.gov.in/s380537a945c7aaa788ccfcd/f1b99b5d8f/uploads/2023/05/2023050195.pdf> (Accessed on 28/03/2024)

¹⁵ *M.C. Mehta v. Union of India AIR 1987 SC 1086* Retrieved from <https://indiankanoon.org/doc/1486949/> (Accessed on 26/03/2024)

¹⁶ *Chairman Rly. Board v. Chandrima Das AIR 2000 SC 988: (2000) 2 SCC 465* Retrieved from <https://indiankanoon.org/doc/113663> (Accessed on 26/03/2024)