

SEXUAL HARASSMENT AGAINST WOMEN IN INDIA

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Abstract: Women across the world have tasted all flavors of life; from the glory and respect which she was ascribed in the Vedic period, to the denial and subordination in the post Vedic period and finally to the struggle for equality, recognition and survival in the contemporary world. But one thing that has been common throughout these phases is the disadvantaged status of the women. Women have been made to face all kinds of violence, physical abuse, denial of right to live, subordination and neglect. The acts of abuses like eve-teasing, molestation, sexual abuse and rape cover both physical and verbal abuses. However, they all are different parts of what is commonly known as sexual harassment or sexual misconduct. This paper covers a brief study of the various aspects of such offences which have led to the growing harassment of women.

The concept like eve-teasing gained nationwide attention in the 1960's but today eve-teasing has evolved as a huge issue in many metropolitan cities of India. A large numbers of Indian women have faced or are facing this menace. Another form of violence against women is that of molestation, or what is commonly known as 'sexual abuse' or 'sexual assault'. It is the forcing of sexual behavior by a man over the women. Further, rape is one of the most extreme forms of sexual violence committed against women. It is an act of physical violence and assault which is expressed through sexual means.

The research methodology adopted for this paper is doctrinal and secondary sources of information like books, articles, newspapers, websites, case laws, etc. are relied upon. Various statute books like the Indian Penal Code, 1860 and The Criminal Law (Amendment) Act have also been referred.

The Indian Law dealing with offences of sexual harassment has been given under the Indian Penal Code, 1860. The relevant provisions which have been included in this research paper are those relating to rape (Section 375 and 376) and outraging the modesty of a woman (Section 509, 294 and 354).

Also, an analysis of the recent Criminal Law (Amendment) Act, 2013 has also been included in the study.

This study includes the various causes which lead to an increase in the number of sexual abuses and rape against women. They include: lack of awareness, illiteracy, upbringing of the abusers, their inability to appreciate the feminine glory of women, etc. An emphasis has also been laid on the possible emotional, psychological and mental impacts which may be suffered by the women.

Finally, the paper also includes certain recommendations with respect to the role of the state, government, media, NGOs, etc in sensitizing the issues relating to violation of the rights of women and also to promote education and awareness with respect to the same.

Keywords: Eve-Teasing, Harassment, Physical Abuse, Violence, Women

INTRODUCTION

The position and status of women has been a very dynamic concept since ages. Beginning from the Vedic period till today's time, the status of women has gone through enumerable changes. Women across the world have tasted all flavors of life; from the glory and respect which she was ascribed in the Vedic period, to the denial and subordination in the post Vedic period and finally to the struggle for equality, recognition and survival in the contemporary world. But one thing that has been common throughout these phases is the disadvantaged status of the women. Women have been made to face all kinds of violence, physical abuse, denial of right to live, subordination and neglect. The most heinous and shameful of such acts is the act of violence against women.

Violence against women is a wide term that encompasses multifarious acts of violence, abuse and torture against women. It does not simply refer to the

physical violence which a woman has to bear, but also verbal abuse, emotional torture, economic deprivation and social disregard. No women are born to be treated in an inhuman manner and to be deprived of her right to life. Any sort of violence committed against a woman is a direct attack on her human rights and is the most shameful violation of human rights. Women of all ages, from all kinds of background and from all walks of life go through some sort of violence in different phases of their lives. It may be in the form of domestic violence, sexual abuse, physical and verbal abuse, rape, trafficking in women and young girls, forced prostitution, dowry-related violence, dowry deaths, female foeticide or infanticide and other inhuman practices. They are victimized and neglected in all fields of life and have to face discrimination in every sphere of human activity. Thus, women across the world face these practices in almost all spheres of life; this may include education, employment, at home, at workplace, in marriage, or even in childhood. Women are perceived to be disadvantaged due to their role in the society as well as the physical and biological differences from men. They are given the titles like caretakers and home-makers and it becomes a perceived notion that women cannot perform all tasks which can be done by men and their capabilities are often underestimated. This is the major reason why men consider themselves in a position to establish their dominance over women.

Violence is basically an act of aggression that crosses the boundary of another person's autonomy and identity.ⁱ In technical terms, violence is basically the use of force which is not permitted by law and which is inflicted against the other person with the motive of achieving something in violation of the other person's will or without their consent. "In short, the concept of 'violence' is notoriously difficult to define because as a phenomenon it is multifaceted, socially construed and highly ambivalent."ⁱⁱ It is a multifaceted and multidimensional concept as there is no single act which can be termed as violent or abusive. It may be in the form of verbal abuse or physical abuse; individual or collective; it may be a continuous process or a onetime incident; or even beyond. It is an act which is incapable of being described and completely analyzed by an observer, as well as the victims themselves. It is a complex and dynamic concept which needs to be carefully understood and dealt with.

Gender-based violence has emerged as a major issue on the international human rights agenda. Although, there is rarely any reliable data on the incidence of gender-based violence in India, there is an increasing body of reports and opinions which indicate that it is widespread and common and exists in all kinds of societies and among all classes of population. It

occurs in a broad context of gender-based discrimination with respect to access to education, resources, and decision-making power in the household, as well as in the public sphere.

The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), also known as the Treaty for Women's Equality, is a landmark international agreement that affirms principles of fundamental human rights and equality for women around the world. CEDAW is a practical blueprint for each country to achieve progress for women and girls.ⁱⁱⁱ India ratified this convention in the year 1993. Even after the adoption of the Convention on the Elimination of All Forms of Discrimination against Women by the United Nations General Assembly in 1979, important progress has been made in almost all major countries for establishing gender-based violence as a human rights concern. But the current scenario defines that the mere adoption of conventions and policies has not served the purpose that it ought to. There is still widespread and deep rooted problem that requires attention because the instances of female victimization have been growing tremendously.

The acts of abuse like eve-teasing, molestation, sexual abuse, domestic violence and rape have become very common forms of offences which are reported almost every day. They cover both physical as well as verbal abuses. However, they all are different parts of what is commonly known as sexual harassment or sexual misconduct. It is the gender based violence which depicts the superior status of men in the society and the victimization of women. It is also pertinent to consider that any form of violence, whether verbal or physical, may be forced against a woman either by a complete stranger, or by people who are known to them. There have been many instances where the suspected offenders are either family members themselves, or relatives, or even family friends. Considering such circumstances, it will not be wrong to presume that a woman is not safe in today's time even at her own home.

SEXUAL HARASSMENT: FORMS AND FACES

Eve-Teasing

A very common phenomenon in India is that of eve-teasing, which means the sexual harassment of a woman in public. It could be done by an individual or collectively, and it may be directed towards one woman or a group of them. It could also be a verbal pronouncement of a socially disapproved comment or a sexually explicit statement. It may even extend to touching or brushing against a woman, following her, or making her feel uncomfortable by making undesired comments. It is a very commonly observed behavior, but not a socially acceptable phenomenon.

As per the Oxford Dictionary, eve teasing means “*the making of unwanted sexual remarks or advances by a man to a woman in a public place.*”^{iv}

The concept of eve-teasing gained the nationwide attention in the 1960's. But today, Eve teasing has evolved as a huge issue in many metropolitan cities of India. A large numbers of Indian women have faced or are facing this menace. Whether it is a public transport or public places or shopping malls, streets or workplace, women feel vulnerable to the threat of eve teasing everywhere. There are many instances where even the girls of young age are being harassed in public places. Eve-teasing is a menace to society as a whole and has to be eradicated. But there is no specific legislation in the country except for the state of Tamil Nadu which has its own legislation to deal with this offence. It is pertinent to note here that this is not simply a matter of an incident which happens one day and is forgotten the next day. It may severely effect a women, both emotionally and psychology. It may be that serious that it could lead a woman to commit suicide due to the harassment and torture that she might have undergone. Eve-teasing is nothing but a serious offence against the honor, dignity, and self-respect of a woman.

On 30.11.2012 the Supreme Court in Deputy Inspector General of Police & Anr v.S. Samuthiram^v, directed the central Government to legislate effective legislation to contain eve-teasing and held that with the changing times, more and more girl students, women etc. go to educational institutions, work places etc. and their protection is of extreme importance to a civilized and cultured Society. The experiences of women and girl children in over-crowded buses, metros, trains etc. are horrendous and a painful ordeal.^{vi} The Supreme Court has also addressed this issue in the above case wherein a policeman misbehaved and eve-teased a married lady near a bus stand in the presence of her husband. He was caught in the act of eve-teasing of a married woman leading to criminal and disciplinary proceeding, ending in his dismissal from service. The Court laid down certain guidelines such as deputing plain clothed police officers in public places, installation of CCTV cameras, reporting information to police stations or women helpline, directing the State Governments and Union Territories of India to take adequate and effective measures by issuing suitable instructions to the concerned authorities so as to take effective and proper measures to curb such incidents of eve-teasing.

Considering such incidents, the legislators proposed to introduce certain amendments in the criminal law relating to eve-teasing and stalking; however the same were not incorporated into the Law. Criticized for excluding stalking and eve-teasing from the

proposed Criminal Law (Amendment) Bill, 2012, the Ministry of Home Affairs is reconsidering its decision to bring them under the ambit of the new law.^{vii}

There have been various other incidents which have been reported recently. On 23rd May, 2013, a youth was beaten to death by three persons when he objected to their eve-teasing his sister.^{viii} Recently, in Maharashtra, there was a great demand for a "uniform" law in India to curb eve-teasing in educational institutions, places of worship and other public places. Thus, it is pertinent to consider that eve-teasing has emerged as an omnipotent social threat which may be faced by any women, of any age, and in any part of the world.

Eve-teasing, which is usually treated as a very common crime is a manifestation of a form of violence against women. It is a very serious issue which leads to immense mental torture and humiliation to the women and girls when they harassed on roads and public transport. A major problem is that most of these incidents go unreported due to various reasons such as fear of social humiliation and embarrassment, lack of parental guidance and support in filing complaints, etc. It is a direct infringement of a woman's right to life with dignity and violates a women's basic right to live. The same is reflected in the newspaper reports almost every day where innumerable incidents of such incidents are reported.

Molestation

Another form of violence against women is that of molestation, or what is commonly known as 'sexual abuse' or 'sexual assault'. It is the forcing of sexual behavior by a man over the women. Molestation is the sexual exploitation of a child or a woman by an adult or a male person for sexual gratification. The Sexual abuses can be of various types namely, Fondling, Mutual masturbation, Sodomy, Coitus, Child pornography and child prostitution, etc. It may be an attack on one's dignity and modesty by an acquaintance or a close family member or friend, or even by a complete stranger. It becomes even more difficult to disclose and complaint against the abuser where he is a family member or a person known to the family otherwise. Though, the people who are a victim or have witnessed such crime have an obligation to report these crimes, but reporting these crimes is a tough task; generally people have a mindset that such cases should not be reported because of the societal pressure as they bring bad name to the victim. The person who has been victimized is seen with disregard in the society. Even the molesters themselves threaten the victims and compel them not to disclose the incident. Thus, molestation is the act of subjecting someone to

unwanted or indecent sexual advances or activity which further compels him to suffer the pain silently.

Recently, incidents have been reported where the uncles or even grandfathers of the victims have been accused of the offence of molestation. On 1st August, 2013 a similar incident was reported wherein a girl was set ablaze by a man after she resisted his attempt to molest her. A number of females have reported incidents of sexual assault by their seniors at workplace in places like offices and even educational institutions. From teachers, to employers and even to family members and friends, the women are insecure from almost everyone around them. They are ill-treated, mishandled, physically harmed and even tortured. This is a clear disrespect for female's modesty and the femininity.

One of the most extreme forms of cases of molestation is when it occurs within marriage. This is popularly known as spousal sexual abuse. It is where a husband physically abuses the wife within the four walls of the house and covers his heinousness under the blanket called "marriage". In such circumstances, not only the women feel reluctant in reporting such incidents, but sometimes they do not even realize that an offence is being committed against them. They silently undergo the daily life trauma and perceive it as a part of their everyday life. They are verbally abused, physically assaulted and made to work like animals and forced to take care of the household and children. They are also an easy prey for the male members of the household in cases where they are uneducated and unaware of their basic human rights. Also, where the male dominant persons in a household are habitual to alcoholism, this problem further exaggerates for women.

In such cases, the woman is a helpless victim who suffers the trauma and shock by the male members of the society. There are no specific laws in the country to deal with the offences of molestation explicitly. However, the issue may be addressed under Section 354 of the Indian Penal Code, 1860 which provides for punishment for using assault or criminal force against a woman with her intention to outrage her modesty. Earlier, the Section provided for the punishment of this offence as imprisonment for a period which may extend up to two years, or with fine, or both. However, after the recent Criminal Law (Amendment) Act, 2013, the punishment has been increased and changed from two years to a punishment which may vary from one year to five years, along with a fine. This has been a welcomed and appreciated initiative taken by the government of the country. Such major steps show the intolerance of the state towards the inhuman acts and violation of women's rights.

Rape

"Of late, crime against women in general and rape in particular is on the increase... Rape is not merely a physical assault. It is often destructive of the whole personality of his victim. A murder destroys the physical body of the victim; a rapist degrades the very soul of the helpless female. The Courts, therefore, shoulder a great responsibility while trying an accused on charges of rape."^{ix}

Rape is one of the most extreme forms of sexual violence committed against women. It is an act of physical violence and assault which is expressed through sexual means. The Indian Penal Code, 1860 defines the offence of Rape under Section 375. Initially, this section merely provided that a man is said to have committed rape who has sexual intercourse with a woman against her will or without her consent or under the various given circumstances in the section. However, with the Criminal Law (Amendment) Act, 2013, the definition of Rape has been made wider. Owing to the various kinds of incidents being reported lately, the Legislators have included a variety of sexual abuses within the definition of Rape and have also increased the punishment for the same offence. After the amendment, it has incorporated the acts like penetration, insertion of objects, application of mouth or even the manipulation of a female's body for the purpose of penetration into the definition of rape. Also, the punishment for the offence of rape has been made more stringent. Grave punishments are prescribed for offences like acid attacks, gang rapes, and for the offence of rape where the victim is left in a persistent vegetative state.

The incidents of Rape have been increasing at an alarming rate in the recent times. A drastic shift has been seen in the crime reporting after the Delhi Gang Rape incident. On 16th December, 2012, a female aged 23 years of age was gang raped and brutally injured in the Southern part of New Delhi, after which she succumbed to death. This resulted in a major havoc in the country wherein the entire nation protested and revolted to bring about a change in the existing laws. As a result, the Criminal Law (Amendment) Act, 2013 was enforced. The occurrence of incidents of rape has gone up in India over the past few years. Women of all ages and all backgrounds are facing this menace. Even the girls of the age of two years are being subjected to such heinous crimes. According to the World Health Organization, every 54 minutes, a woman is raped in India. This is the statistics even after a number of cases go unreported. Statistics in India show an increase in sexual crimes against women. Figures from the National Crime Bureau indicate a three-per cent increase in such crimes, amidst reports of rape

cases daily.^x In a few reported incidents, there have been cases where the girls of one year of age or even of a few months old, are raped by their relatives, or servants, or even strangers.

There may be various forms of rape by which a woman may be victimized. It could be in the form of Custodial Rape, Gang Rape, Marital Rape, or Individual Rape. The Verma Committee Report, on the basis of which this amendment was brought in, points out that a 2010 study suggests that 18.8 per cent of women are raped by their partners on one or more occasion. The most extreme form of assault that can be inflicted against a woman is that by her own husband. This is an unacceptable reality of today's world that the place where a woman should feel safest has itself turned into the place of her exploitation. A man, whom she expects to be protective and caring, himself turns into a beast to snatch away her dignity and her human rights. Another rising trend in the manner of committing such an offence is gang rapes. Almost every newspaper contains a story of a gang rape victim every day. In such circumstances the victim becomes a helpless person due the reason that the victim falls weak compared to the number of offenders, and also because of the fear and threat, coupled with a feeling of helplessness.

Thus, women may be subjected to varied degrees of sexual harassments. An important factor to be considered is that in majority of the Rape cases, the offender or the rapist is a person who is known to the victim. It may be a family member or a family friend or any other acquaintance. However, it can generally be a stranger as well.

Thus, the offence of rape is not only a crime against a human person's body, but also her soul. It is because of these incidents against women that the women are seen as a weaker section of the society and the males enjoy a dominant position. Hence, there is a strong need to address the issues relating to sexual harassment of women through offences like rape, eve-teasing and sexual assault and molestation. The rate with which these incidents are growing around the country is a major issue for concern. This is not only important from the view of protecting the women, but also for reducing the crime rate in the country and to ensure a safe environment for all.

LAW RELATING TO SEXUAL HARASSMENT

The Indian Law dealing with offences of sexual harassment has been given under the Indian Penal Code, 1860. The Code defines the concepts of Rape, Stalking, Assault, etc. but it does not define the word eve-teasing or molestation. It has defined the offences and the elements which constitute the offence, and has also prescribed a punishment for the same.

The provisions dealing with the crime of eve-teasing are contained in Sections 509, 294 and 354. Section 509 prescribes the punishment for outraging the modesty of women by uttering any word, making any gestures or doing any act with the intention of outraging a woman's modesty. Section 294 prescribes the punishment for committing any obscene acts or uttering or saying obscene songs. Similarly, Section 354 prescribes punishment for use of assault or Criminal force to a woman with the intention to outrage her modesty. However, the term Eve-teasing has not been explicitly used in the Code, nor the concept of modesty has been defined as it differs from place to place. Something that may not amount to outraging modesty in USA, may amount to outraging of modesty in India. What may be obscene in India may not be considered obscene in USA. Apart from this offence, the offence of Sexual Abuse or molestation may also be addressed under Section 354 of the Code.

The provisions of IPC dealing with the offence of Rape have been laid down under Section 375 and 376. As discussed above, the scope of the definition of Rape given under Section 375 was narrow, which has been amended and modified to meet the needs of the current society. The December gang rape and subsequent death of a twenty-three-year-old student in New Delhi ignited a national furor over India's treatment of women and the perceived culture of complicity with regards to sexual violence in India. It was due to this nationwide protest that the law was amended. Section 375 now provides the definition of Rape as the penetration of penis, or any object to any extent into the vagina, urethra, anus or mouth; or manipulation of body parts of women so as to cause penetration or application of mouth to the private parts of a woman, etc. The new law also incorporates stringent punishments in Section 376 for rape, gang rape, as well as acid attacks. It has also made special provisions to prescribe punishments for the offence of rape where the offence of rape causes death, or leaves the victim in a vegetative state. It also prescribes grave punishments for repeated offenders of the crime of rape. Apart from these measures, the government and the courts lay down several policies and guidelines for ensuring women security in the country. For instance, there has been an establishment for a special system of women's helpline number in Delhi; special regulations have been made for women safety in public transport; new and suitable laws have been enacted; even special phone applications have been made available which could help tracing a person; etc.

Apart from ratifying CEDAW in the year 1993 for the purpose of building a sound framework for protection of women's human rights, India also passed The Sexual Harassment of Women at

Workplace (Prevention, Prohibition and Redressal) Bill, 2012 on 26th February 2013.

However, the loopholes in the Indian Law and the absence of complete description of certain offences like eve-teasing and penal provisions for all such sort of offences is a major lacuna to be covered. It is important to make a complete set of laws which could cover all such offences and make the society safe and secure.

CAUSES OF SEXUAL HARASSMENT AGAINST WOMEN

In India, the major cause for the subjection of women to these kinds of inhuman acts and violation of the right to life with dignity is the patriarchal system of the society where the male members are considered to be superior to females. The role of men and women in the society is seen in terms of domination and subordination. Women are perceived to be submissive and to be kept under the control and supervision of men. The women have been considered as a weaker section since ages. The glory that was ascribed to women in the ancient and vedic society was all taken away when writers like Manu asserted and prescribed low status for women in their writings. According to Manu, a woman should never be independent. She should live under the control and supervision of the male members of the family throughout her life. As a daughter, she should be dependent upon her father; as a wife, she should be dependent upon her husband; and as a widow, she should be dependent upon her son. Such views and opinions have degraded the status of women in the society. Also, a major reason why men fail to respect the modesty and decency of the females is the mindset and upbringing of the men.

Another major difference why men are considered to be stronger than women is due to the biological features and the societal attributes where women are expected to be fragile and weak. Since they lack physical strength and the capability to fight back in protection, they become easy target for the abusers. Women are much more likely to be victims of sexual harassment precisely because they more often than men lack power, are in more vulnerable and insecure positions, lack self confidence, or have been socialized to suffer in silence.^{xi} The attributes like shyness, softness in voice and behavior, dependence on parents and brother, etc, have all led to the general view that women cannot protect themselves.

One of the major reasons and justification for such offences given by the society is the character and dressing style of the females who are victims of such offences. Some political leaders and social workers have made remarks and pointed out that it is the lifestyle of women which encourages men to

approach them and to commit the acts of sexual harassment. Wearing short dresses; enjoying social life in parties and evening outings; having friendly relations with male members; etc. are a few of such explanations given by the people to shift the burden from the offenders and abusers to the victims. Rather than supporting the victim and having sympathy towards them, they are criticized and seen as the reason for the commission of the crime. However, it is pertinent to note that even women of old ages as well as young girls are also victimized. From girls who go out for party at late hours of night to old age women who go to the temple in the morning, all categories of women are at the risk of being victimized. Those who wear western dresses and those who wear traditional sarees are all equal suspects for the abusers.

Another reason why the incidents of sexual harassments have been growing is due to the inability or the denial of the female victims to report these cases. They feel hesitant in reporting such cases as they feel that the victimization caused to them will further increase in case they reported the incident. The society would look upon them in disregard and the proceedings launched by them will cause further harassment when personal and unsolicited questioning will be done to them.

Apart from these reasons, what encourages men to overpower women and exploit them is their desire to prove their strength over the opposite gender. Some common reasons for these offences may also be revenge, hatred, or mere pleasure. This is because the societies are not yet developed and mature enough to understand the need to respect the females. Another major factor is alcoholism and drunkenness of the people who commit such offences under the influence of such addictive substances. It is also because a majority of the abusers are people belonging to the uneducated or illiterate class who have not been given proper knowledge and thus fail to appreciate the feminine glory of women. Thus, such crimes have become very common in the country.

IMPACT ON WOMEN AND SOCIETY

When a woman is subjected to sexual abuse and harassment in the form of offences like eve-teasing, molestation or in the extreme forms like rape, a woman goes through shock and trauma which cannot be easily analyzed. A victim is socially ostracized and morally degraded with a lifelong stigma on her dignity and character. The mental torture is deep and the mental agony is unbearable.^{xii}

In cases of eve-teasing, it becomes practically impossible for women to walk through the same streets and work in the same place where they know

that they will have to face the extreme forms of abuse in the form of obscene comments and gestures. Also, it causes emotional and psychological imbalance which further disturbs the personal life of the victim. However, the consequences are deep and grave in cases of sexual harassment or molestation and rape. They leave a permanent scar on the mind of the victim which leads to further problems in adjusting in the society. This is because the society also makes them feel excluded. Rather than supporting the victim and sharing sympathy, the victimized person has to face further exclusion inflicted by the society and even relatives.

Some women who face this humiliation and harassment also develop psychological problems. They may develop suicidal tendencies and even take extreme steps like actually committing suicide and even the family members take such extreme steps due to the societal pressures. Young girls who are the victims of sexual abuse experience physical, biological and behavioral problems that can persist for decades after, a new study shows.^{xiii}

Women, who have suffered the humiliation and harassment, show certain peculiar characteristics in their behavior such as: frightened, guilty, powerless, angry, ashamed, depressed, numb and lacking self-confidence. Thus, these offences highly influence the lives of the women in many negative ways. They are not only a physical abuse, but also an emotional and mental torture which walks with them throughout their lives.

With special regard to rape within marriage, it is a concept that causes humiliation and trauma to the wife to the very core. The fear of having to face it and still have to silently suffer through it is an unbearable thought that affects women both psychologically, as well as emotionally. This self enforced silence and surrender to sexual abuse has far reaching and detrimental effect on the emotional, psychological and mental stability of women.

Apart from these notable features, the extreme forms of impacts that may be witnessed among the victims may also include long term symptoms like sleeping disorders, eating disorders, sexual dysfunction or loss of self confidence and developed negative self image. Children, who are brought up in families where there is persistent violence, may show some signs of behavioral and emotional disturbances. These can also result in perpetrating or experiencing violence in future life.

CONCLUSIONS

The growing menace of physical and sexual abuse against women needs urgent attention. The society and the Government should make the necessary efforts in bringing in and enforcing specific laws

targeting the issues relating to sexual abuse. The Police authorities and media can also play an important role in sensitizing the women about their rights and the remedies available to them. The state shall regulate the working of police officials in dealing with offences relating to women. Thought the state and state authorities have been making sincere efforts to implement measures to provide a safe environment to the women in society, but the evil practice still persists and corrupts the social harmony. It is also very important to empower women through law reform and social change so that there is a sense of security.

There should be an initiative taken by the NGOs, Schools and colleges to educate women and to spread awareness among the women class so as to protect themselves from sexual abuse and harassment. They should be taught to revolt and resist any acts of physical abuse and also to report the same. Also, there is a major role to be played by the parents in achieving this special goal, which is to provide a sound and proper upbringing to their children. It is very important to change the perception and outlook of men towards women in the world. They should be taught to respect the glory of women and not to consider them as an object for the satisfaction of their disrespectful greed. Therefore, it is very important to change the mentality and mind set of the society.

Also, there is a need to bring strict enforcement of the existing laws so as to ensure proper security to women. The enactment of The Criminal Law (Amendment) Act, 2013 is a major achievement of the Indian Legislature as it has incorporated various necessary provisions and has also made the punishments more strict and grave. However, the instances of such crimes are still being reported. This shows that the existing framework is not sufficient to deal with the problem of violence against women. Thus, a lot is yet to be done to make the society a safe place for women.

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