

# Legal Reforms Addressing Sexual Harassment in India: Examining the Role of Women's Dress as a Contributing Factor

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## Abstract:

Women's clothing choice is mainly used as a reason for violence against them. The socially constructed aggression toward women is made to fit into the role the woman might be perceived to have in an attack. This shifts part of the responsibility for this violation onto the victim and the perpetrator. This paper discusses how the concept of "choice of dress" has emerged as one of the factors contributing to sexual violence against women. This paper discusses public opinion on this issue and attempts to enter into the perception that women's attire is being used as a justification for violating their rights. This paper has proceeded to analyze the role of law in preventing sexual harassment and considers public opinions on the possible introduction of legal regulations concerning women's dress codes, together with the probable impact such regulations may have on women's self-esteem. This research is based on both primary (convenient sampling and analysis through SPSS software) and secondary sources (books, articles, reports, legal commentaries, and case laws) dealing with sexual harassment laws. It attempts to provide reform proposals that shift attention away from women's clothing and instead focus on accountability on the part of the perpetrators in legal frameworks.

**Keywords:** Choice of dress and harassment, Social perception of women's attire, Victim Blaming, Legal regulations on dress.

## Introduction:

The term "sexual harassment", "sexual assault" and "rape", have become highly prevalent across society irrespective of age, gender, and place. Sexual harassment means unwelcome sexual advances, conduct could be both physical, verbal, and non-verbal which includes voyeurism, stalking, sexual gestures, offensive jokes, and comments. There are various factors relating to sexual harassment including sociocultural factors, provocative dress, high sexual urge, victim attitude, psychological factors, and others. This paper looks at how women are perceived in society and the selection of women's attire, particularly from the perspective of sexual objectification. While women serve critical roles in society as daughters, sisters, wives, mothers, and friends as well as love, care, and sacrifice figures, my study has found that they are constantly portrayed as mere commodity products of sexual desirability and therefore perceived in nothing else but sexual objects. It cements negative cultural tradition, so to speak, because women are like toys for men to play with; and most often, the images of the society will silently dictate that women, because of appearance or actions, are sexually accessible at all times.[1]

A culture-specific notion of this thought is when women wear provocative clothes, they are asked to be

sexually approached or raped. I thus raise a question to this assumption by trying to prove it wrong: women's dress choices cannot be used to seduce men. No behavior not even clothing choices justifies violence or harassment against any female. My paper focuses on the motivation of women's dressing in exposing clothes and side by side with that of perceptions of men, including the question of whether or not men are attributing sexual intent in clothes that women wear without them having such intent. This serves to challenge rape myths about women being prompters of sexual advances and societal nature, wherein violence and crimes take the course of victim-blaming rather than the offender.

Drawing all these into the current legal reforms in India, a very important concern lies like tension around public perceptions of what a woman's dress might be against the improvement happening in law to look upon women's issues and dignity. Myths in cultures regarding women's dress add to a perception against women that makes women “collectibles”, so to speak, and excuses or rationalize sexually violent acts towards them. However, India's efforts to check these malicious attitudes include legal reforms like the Criminal Law (Amendment) Act, 2013 [2], and the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 [3]. These enactments place renewed emphasis on the aspects that no sexual violence and no harassment is condonable in whatever dress or behavior a woman may adopt. It is part of the attempt to bring down the culture of victim-blaming with the legislative change of increasing penalties for sexual assault and harassment. Courts in India have been sensitive enough to drift away from patriarchal presumptions. Very landmark judgments such as *Vishakha vs. State of Rajasthan* [4] and later judgments lay down the principle that a woman's dress or conduct cannot be used as an excuse for sexual assault. This is no different from the conversation happening globally regarding women's rights and bodily autonomy and challenging the thought that a woman's dress or appearance infers a woman has given her consent.

In this context, my work is important because I highlighted the law as a tool to challenge the wrong social thoughts that have allowed objectification and harassment of women. Further legal reforms must evolve into making women's right to choose how they dress fundamental, not an invitation to harass or assault them. Building the machinery of enforcement and public awareness campaigns can fight these archaic views of the perception of women's rights in India.

### **Scope and Objectives**

The paper shall trace the evolution of legal structures deployed to deal with sexual harassment in India, highlighting key legislation, such as the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013. As part of the broader social, cultural, and societal narratives on women's dress and modesty as well as public perceptions about their being deployed as factors that have molded the legal frames of women's clothing as a contributory factor to harassment, it shall look at these. The study examines case law, judicial attitudes, and public discourse, yielding comparative inputs from other countries. It presents a study of how the vicarious attacks on the victims have actually impacted India's internal structures of law and society by examining these attitudes with perceptions of women's attire. Finally, it attempts to provide reform proposals that shift attention away from women's clothing and instead focus on accountability on the part of the perpetrators in legal frameworks. The objectives of this paper are the critical evaluation of the legal framework, an understanding of how social influences impact it, a look into victim-blaming narratives, a comparison of global norms, and advice for reform of the law that rejects victim-blaming but retains perpetrator accountability.

## Historical Overview of Sexual Harassment Laws in India

A major step forward was achieved in recent decades to check sexual harassment, which had been prevalent in Indian society. In the early 1920s, a journey began with the Child Marriage Restraint Act of 1927, where marriages involving young girls were prohibited, thereby preventing exploitation. However, the discussion on workplace harassment caught momentum in 1992 when Bhanwari Devi, a social worker from Rajasthan, was gang-raped for trying to prevent child marriage. The case stunned the nation by exposing the vulnerability of women encountering violence at work [5]. Moreover, they were workers engaged in social reforms expected to be under legal guardianship.

A major judicial milestone was reached in 1997 with the judgment by the Supreme Court of *Vishaka v. State of Rajasthan* [6], which rendered guidelines for the prevention and redressal of sexual harassment at work. These guidelines were developed into what would later become known as the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act (POSH Act), enacted in 2013. Pre-law, through those years leading up to its enactment, reports and rulings continued to bring out the pervasiveness of harassment. The Andhra Pradesh Women's Commission [7] identified, in a 2003 report that numerous working women in the state are victims of sexual harassment, while in 2008, the National Commission for Women [8] identified the same problem within educational institutions. In a 2006 ruling, the Supreme Court [9] defined sexual harassment to include quid pro quo and hostile work environment that is as lucid as it gets not physical contact, but emotional and psychological attack.

The landmark step is the POSH Act enacted in 2013 [10], providing a detailed legal framework to overcome workplace harassment. An organization having ten or more employees should form Internal Complaints Committees (ICCs) having women as at least 50% members and a woman chairperson too. According to the Act, sexual harassment defines any unwelcome sexual advances, requests for sexual favors, or conduct of a sexual nature that creates an intimidating, hostile, or offensive working environment. The law also indicates penalties such as imprisonment, fines, and other disciplinary actions against offenders. Despite these provisions, consistent application and lack of awareness remain more significant challenges, while weaknesses in reporting mechanisms continue to plague the mechanisms of these laws. Many victims do not report because of fear or distrust in the process.

The Court decisions following the Act's enactment have confirmed the validity of its provisions. For example, in *Apparel Export Promotion Council v. A.K. Chopra* [11], the Supreme Court in 1999 held that sexual harassment does not necessitate physical contact per se and any 'unwelcome' act would suffice. Likewise, the 2013 case of *Medha Kotwal Lele & Ors v. Union of India & Ors* [12], directed states to strictly enforce Vishaka guidelines. Recent Supreme Court directions in 2023 highlighted the continued lapse in the implementation of POSH Act and instead advised employers to hold regular workshops and improve the training of ICC members. Social movements, especially the "Me Too" wave in 2018 [13], have also played a very significant role in spreading awareness and encouraging women to raise their voices. This has made the organizations take this issue more seriously. Incidents of sexual harassment at the workplace are now more readily reported to the committee in the workplace, the educational institution, or other authorities such as the police or NCW. However, so many cases continue to remain unreported, and again, the very system tends to fail to instill confidence because of slow and biased investigations.

The POSH Act has been a giant leap in handling the issue of sexual harassment in the workplace, but yet, several shortcomings remain. The law mainly concerns women, and yet, critics point out it should cover men and LGBTQIA+, who are now obviously visible in the workplace of today [14]. Effective

implementation is one of the difficult tasks. However, with these challenges, both the existing legal framework and awareness are a step toward making safer environments. Efforts in enforcing the law, raising awareness, and making the process transparent would help to counter harassment and build confidence in the complaints process.

### **Cultural Perceptions of Women's Dress**

Fashion has always been a source of expression but in years gone by had also been used for oppression and judgments against women. People used to wear traditional garments like sarees among the women and kurtas and dhotis among the men. Gradually, with time, preferences changed. In the 20th century, women started wearing kurtas and men began wearing pajamas. In the 21st century, clothing has become informal to a larger extent. Women can be seen donning jeans or t-shirts, or even dresses, and men have adopted highly informal styles as well. However, one of the key societal perceptions concerning women's dress codes remains stuck in the past to date. Most women, today, do not dress to please themselves but to please others. Where their clothing speaks to is the kind of person they are. The impression does not come from them, but society tends to give judgment on what someone wears. This applies even in India, for instance, where infrastructure development has significantly increased faster than their way of thinking. Many will cling to archaic beliefs about how women should dress, even though they claim to support gender equality.[15]

An excellent example of this hypocrisy is the way society thinks about the difference between public figures such as actresses and models and women. For instance, some families restrict their daughters or wives from wearing modern Western-style clothes while at the same time hailing celebrities for wearing such clothes. Such standards reveal very deep-seated biases against women's freedom to dress however they wish to. This society also blames women for harassment or violence if they are dressed a certain way. This is often an excuse to justify bad behavior. An example of this type of society is when a wealthy person is robbed of their gold jewelry-the man is not condemned for wearing gold, but the thieves for robbing him. In the same way, the woman is harassed or assaulted, there is no justice for referring the victim to her dressing for harassment instead of bringing the perpetrator to the book. Women are often expected in their clothing even in their homes. A working woman, for instance, may be requested to shift from her professional western garment when she gets back home to wear traditional ones. This in return establishes the fact that western fashion is unacceptable within those spaces which negatively affects a woman's self-confidence to express herself.

In most countries across the globe, outside of the cultural West, a woman is expected to dress even more conservatively, depending on what is seen as the notion of culture or religion. For example, in Malaysia, Kyrgyzstan, and elsewhere, women have been sexually harassed or even raped because their clothing was deemed too religious or too secular. This could not be said of one geographic region alone; this is an all-generically told problem that is repeated continuously across Asia, the Americas, the Middle East, and Europe. Muslim women in several European countries have been victims of discriminatory acts and violence based on their headscarves. For instance, while in Kenya and Liberia, women have suffered harassment for wearing either religious or secular garments. This goes to the extent that clothes are not just about one's style; they are usually deeply intertwined with issues relating to a country's culture, politics, and religion in the way women are treated.[16]

Dress codes in the world are still under debate, especially in the workplace. Social pressures combined with ambiguous rules have further caused misunderstanding and incorrect implementation. While fashion

and clothing serve as a powerful form of expression, they should not be utilized to control and judge women any longer. The dominating societal norms are old-fashioned ways of thinking and the presence of double standards determines how women should and shouldn't dress. It is in the workplace, their homes, or public areas; women end up becoming judged for no apparent reason by what they wear, which ought to change. True gender equality gives the right to dress freely as they wish without being judged or harassed.

### **Role of the Judiciary in victim blaming in India**

Victim-blaming remains an issue that prevails over sexual assault cases in India, where a woman's behavior, clothing, or character overshadows the accused's conduct before courts. Such judgments have been termed strictures by higher courts and have directed other courts not to enter into this trend. Despite that, many judges continue to deliver judgments that prove damaging to victims as well as reinforce patriarchal stereotypes.[17] In *Raja vs State of Karnataka (2016)*, the Supreme Court granted bail to the accused. Arguing, it was the conduct of the victim not that of a rape survivor. According to the court, her behavior during the incident seemed "submissive and consensual," showing just how hard-seated biases negate the very fact that a victim gets up against an accused.[18]

More shockingly, the case of the *Kerala Sessions Court (2022)* released Civic Chandran on bail when it held that the "sexually provocative dress" negated the victim's claim under Section 354A (outraging a woman's modesty) [19]. A judgment like this dumps all the blame on the woman's clothes and reinforces another damaging stereotype, namely that the dressing of a woman is a sign of consent. In the case of *Vikas Garg vs State of Haryana*, [20] wherein the court made derogatory remarks about the character of the victim, holding that she was an alcohol addict and had condoms too. The court focussed on her behavior and rather impliedly seemed to suggest that these factors had led to her getting assaulted. The accused was granted bail and not punished in spite of such serious incidents.

There have been instances where judges propounded reaching the extreme by suggesting that rape victims should marry their tormentors. This is evident in *Supreme Court (2020)*, wherein Chief Justice S.A. Bobde asked an accused rapist whether he would marry his victim. It is symptomatic of a draconian mentality which feels that marriage can "wipe out" the crime of rape. These decision-making steps aside, however, there have been a few strides forward. In *Aparna vs State of MP*, the Supreme Court of India criticized a ruling of a lower court, which ordered bail for a rape accused on the condition that he ties a "rakhi" on the victim's hand. Put forth that such rulings degrade a victim's dignity and must not be made [21]. In the case of *Nikhil Sharma v State of J&K*, the Supreme Court of India insisted on courts being sensitive while dealing with rape cases, considering the grave social stigma and trauma that the victims suffer, and cautioned against unfounded assumptions about the conduct of the victims. [22]

Finally, in 2023, the Supreme Court took *Suo motu* cognizance of the Calcutta High Court's judgment, making objectionable comments regarding adolescent girls "controlling their sexual urges." The apex court condemned the remark, reiterating that rape trials should revolve around the conduct of the accused and not the conduct of the victim. These case laws depict a continuous struggle in the Indian judiciary where patriarchal minds continue, yet it also point out hopeful changes because courts start to understand the need to be more sensitive towards victims.[23]

### **Research Methodology**

This paper depends on both primary and secondary data. The primary data for the present study is collected



using convenient sampling collected in and around Chennai. A total of 201 respondents answered a questionnaire prepared by the researcher of the study. The data thus obtained has been analyzed through SPSS to gain accurate insights into the data. The data has been analyzed using tools like Percentage analysis and Chi square.

**Table 1: The demographic profile of the sample is given below:**

VARIABLE	CATEGORY	PERCENTAGE
Age	21-30 Years	51.2
	31-40 Years	30.3
	41-50 Years	17.9
	Above 50 Years	0.5
Gender	Male	32.3
	Female	67.7
Education Qualification	School level	6.0
	UG(currently pursuing also)	88.1
	PG( currently pursuing also)	5.5
	No formal education	0.5
Marital status	Single	53.2
	Married	46.8
Income	less than Rs.10,000	2.5
	Rs. 10,001 - Rs.30,000	38.3
	Rs. 30,001 - Rs. 50,000	57.2
	Yet to be employed	2.0

In this study, respondents were split into various classes such as Gender, age, and income. The respondents were split further into subcategories, such as women (67.7%) who answered the survey higher than men(32.3%), women were highly responsive as this topic attracted them to answer the questions in the survey compared to men. Respondents were also split under age as 20-30 (51.2%), 31-40 (30.3%), 41-50 (17.9%) and Above 50 (0.5%) and under income they were split into Less than Rs 10,000 (2.5%), Rs 10,001 - Rs 30,000 (38.3%), Rs 30,001 - Rs 50,000 (57.2%) and Yet to be Employed (2.0%). The Disparity of age, gender, marital status, and income occurs because the responses were collected in a convenient sampling method, where the people answering the survey are respondents who can easily be questioned by the researcher.

**Table 2: The perspective of respondents towards womenswear could be a factor for sexual harassment.**

Statement	Category	Percentage
Women’s wear could be a factor for sexual harassment	Yes	65.7

	No	34.3
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Under this table, 65.7 percent of respondents have opted “yes” for womenswear could be the factor for sexual harassment and 34.3 percent of respondents have opted “no” for womenswear could be the factor for sexual harassment. From the responses collected, it has been clearly understood that the majority of the respondents agree to the factor that womenswear could be one reason for their sexual harassment.

**Table 3: The perspective of respondents towards the victims of rape/sexual harassment could be denied legal remedies for wearing provocative dresses.**

Statement	SOP(%)	SWOP(%)	NSPNOP(%)	SWSP(%)	SSP(%)
Victims of rape/sexual harassment could be denied legal remedies for wearing provocative dresses.	65.2	22.9	10.0	0.5	1.5

*SOP: Strongly Oppose, SWOP: Somewhat Oppose, NSPNOP: Neither Support nor Oppose, SWSP: Somewhat Support, SSP: Strongly Support.*

Under this table, the majority (65.2 percent) of respondents strongly oppose the fact that the victim of rape/sexual harassment could be denied legal remedies for wearing revealing or provocative dresses and (22.9 percent) of the respondents somewhat oppose the above-stated statement, this means that victims of rape/sexual harassment shall not be denied from approaching the available legal remedies for wearing provocative dresses at the time of rape/sexual harassment.

**Table 4: Perspective of the respondents towards the factors which make “rape/sexual harassment” a debatable topic in developing countries than in developed countries? (Chi-square analysis), this is done to understand the variability in statements relating to factors of rape/sexual harassment concerning individual characteristics of respondents.**

Statement	Independent variables	Chi-square value	P value	Results
Poor acceptance of the social upgrades	Education Qualification	130.257 <sup>a</sup>	.000	H0 is rejected
Backward thinking and Ignorant	Age	29.106 <sup>a</sup>	.000	H0 is rejected

From the above table, the null hypothesis is rejected for the statements at 5% level of significance.

It is clear from the cross-tabulation that, respondents falling under different education qualifications have different perspectives on accepting the factor that poor acceptance of the social upgrade could be making “rape/sexual harassment” a debatable topic in developing countries than in developed countries. The respondents with UG and PG qualification are the majority agreeing to the factor whereas the respondents with no formal education deny that factor. This shows educated people are ready to accept the evolution and to adapt to current trends without condescending.

Based on the respondent's age group their opinion varies on considering backward thinking and ignorant as the factor for making “rape/sexual harassment” a debatable topic in developing countries than in developed countries, majority of the age group lying between 21 to 30 and 31 to 40 agrees on that factor whereas on the other side like age group above 41 years deny on that factor, this clearly shows that old aged people are not ready to upgrade themselves on social changes.

### **Recommendations for Legal Reforms**

Legal Reforms Addressing the issue of women's dress as a cause for sexual harassment in India would require several legal reforms: There should be comprehensive anti-harassment legislation defining what constitutes sexual harassment and reaffirming that a woman's clothing does not influence what some perpetrator does. Such legislation should focus on the deed of harassment and not on the attired person, as "reports of the National Commission for Women indicate.". Now, sensitization of police forces and judiciary also is required. Current notions need to be busted, and psychological ramifications of victim-blaming should start ringing in the heads of officials also; it is more than what studies-especially by such institutions as the Indian Institute of Management made evident.[24] Equally, there needs to be a gargantuan public awareness drive to take on societal attitudes about women's clothes and consent. The Ministry of Women and Child Development has further motivated such movements against gender-based violence, thereby increasing awareness about women's rights.[25]

Reporting and support mechanisms need to be empowered. Sensitive, confidential reporting systems accessible to victims must be established along with legal and psychological help. It would then embolden women to come forth and report these crimes in good faith and without fear of retaliation. Such effective support mechanisms have been argued for in the Rani Mukherjee Committee Report [26] while discussing reporting these incidents. Legal changes to the Indian Penal Code need to be brought about so that harassment based on attire forms a serious offense and clauses that promote the victim-blaming mentality are done away with. Discussions from legal scholars, including those in Lawyers Collective, have debated these changes needed to better protect women against harassment.

Lastly, women's voices must find their way into the legislation. Involving women's groups and civil society organizations ensures that the legislations capture the experiences and needs of women. According to the UN Women India office, "Women's voices are critical to shaping policies that affect rights." [27] There should also be a zero-tolerance policy in educational institutions. Such policies should zero in on the behaviors of perpetrators and hold workshops with the students on consent and respect. The National Education Policy 2020 encourages non-harassment learning environments that are safe and accessible to women. [28]

As a whole, the steps would be attempted to shape an enabling legal framework that would address the violation of rights of women in society, change negative and prejudiced attitudes of people towards women, and foster an open space where women could freely speak their minds and express their opinions without hesitation or fear of harassment.



**Conclusion and Suggestion:**

This research based on sexual harassment in the Indian scenario reveals the role of the dress code of women. Thus, it has been systematically pointed out to be changed. There were a few changes with legal reforms, but the courts themselves blamed the woman for the assault and harassment situation because her attire has been highlighted and pointed against her as the reason for violating the woman. This can be seen in many case judgments wherein comments made on the attire of women have gone on to determine the judgments, even though laws such as the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 exist which do not consider the clothes a woman wears while dealing with cases of harassment. The solution lies in bringing judicial reforms that tend to sensitize the judiciary and law enforcement toward gender biases. Legal codes must be altered to clearly state that no one's clothes could become an addition to cases of sexual harassment. Furthermore, there should be obligatory training programs for judges and policemen on unbiased handling of the case from a victim-centric approach. Furthermore, stronger legislation must find a place to deter any form of victim-blaming at judicial levels, especially with respect of wear or character.

Another mechanism for challenging the societal myths surrounding girls' clothes morality and consent is through public awareness campaigns. The education reforms, where gender sensitivity training takes root in the minds of youngsters from an early age through a changed curriculum, will make those stereotypes irrelevant. The media houses also should adopt ethical reportage provisions that do not sensationalize the dress worn by women as a reason for sexual harassment but bring on board the accountability of the perpetrator. A multi-faceted approach comprising judicial, publicity, and educational reforms on the freedom of a woman to dress being misinterpreted as an invitation to harassing behavior and the legal system holding accountable only the perpetrator.

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