

# Understanding Sexual Harassment in India's Workplaces: Issues and Concerns in Access to Justice

Bora Bhaswati<sup>1</sup>, Sinha Minakshi<sup>2</sup>

<sup>1</sup>PhD Scholar, School of Behavioural Sciences, National Forensic Sciences University, New Delhi, Delhi NCT, India

<sup>2</sup>Professor, Director Training, National Forensic Sciences University, New Delhi, Delhi NCT, India,

## Abstract

Sexual harassment in the workplace is a global problem that India fights to curb through its existing laws. The study examines how victims access justice using a combination of primary and secondary sources. It shows how the intricacies of the law and organisational policies prevent the need for universally adopted workplace practices. Gender bias, power dynamics, and societal norms lead to no reporting within the system. In this regard, it is recommended that the legal frameworks be improved, and there be the presence of fast-track courts and enhancement programs introduced, which can help create an atmosphere safe for victims.

**Keywords:** workplace harassment, sexual harassment at the workplace, sexual harassment law India, me too movement, POSH Act India, Vishaka guidelines

## Introduction

Sexual harassment affects millions of women worldwide. India is not an exception. In India, laws and legal remedies exist for sexual harassment, but women face multiple barriers while approaching the legal system to punish their harassers. The issue is not just of a country but a global phenomenon. Take the example of the US, where 1 in 5 women have faced an attempted assault or assault in her lifetime (Rainn, 2019). The same country reported about 81% of women facing some or the other form of harassment in their lifetime (Rainn, 2019) <sup>[1]</sup>.

In terms of India, 2022 saw 4,45,256 crimes against women. On calculating the numbers it is just 6% of women who faced harassment or violence against them owing to their gender (Crime in India, 2022) <sup>[2]</sup>. The picture however is lopsided as many cases go unreported. Constitutional amendments and new provisions fall flat on a judicial system that is swarming with unresolved cases <sup>[3]</sup>.

Apart from the sexual assaults there is a strong undercurrent of harassments. Most of the times the harasser is known to the women and often come from a position of power. The fear and shame running in the psyche of the victim accounts for these crimes to go unreported. The concept of quid pro quo <sup>[4]</sup> is engraved in the social psyche. The return of favour in lieu of sexual favours, forcing someone to perform a sexual act in lieu of a false promise or coercion go against the fundamental rights of Article 14 of the Indian Constitution, equality before law irrespective of religion, sex, caste, race or the place of birth and Article 21 of the Indian Constitution, Protection of life and personal liberty.

The issue touches every strata of the society and is not an isolated problem. A survey by INBA into the BPO and IT sector gave light to the fact that 38% of women faced sexual harassment at workplace out of this 68.9% said they did not report the problem out of a fear of a rebuttal or embarrassment <sup>[5]</sup>. In most of the scenarios the issue is “He said and She said”, most of the times the “He” comes from a position of power and reverence and may have a hold on any committee that the corporate formulates to investigate. The major problem plaguing justice when it comes to sexual harassment is the lack of reporting, most of the cases do not have a concrete proof and as time elapses the proofs are harder to grasp (Johnson, 2021) <sup>[6]</sup>.

### **The Magnitude of the Problem**

Sexual harassment is a significant issue in India; women are the primary victims. According to a report from the National Crime Record Bureau, in 2019, about 88 rape cases and more than 700 molestation cases were registered daily across the country <sup>[2]</sup>. Furthermore, sexual harassment is an issue in offices, educational institutions, religious institutions, and public transportation. It shows that the problem is not confined to any particular place or class. Sexual harassment impacts women's mental and physical health and ability to work or study, leading to severe emotional and material costs <sup>[7]</sup>.

Between 2015 to 2018 not a single case of Sexual Harassment originating from the unorganised sector was reported. A survey by Oxfam India in collaboration with Social and Rural Research India found just the opposite trend where women working as daily wagers, domestic help faced more incidents of sexual harassment than their counterparts working in the organised sector <sup>[4]</sup>. 85% of women who work belong to the unorganised sector (Masood et al., 2015) <sup>[7]</sup>. The sector contributes 60% of the national income and out of which 30% are women <sup>[8]</sup>.

During the pandemic a new dimension was added to harassments at workplace <sup>[9]</sup>, <sup>[10]</sup>. As per the National Commission of Women the cases of online sexual harassment have increased five times during the lockdown <sup>[11]</sup>. As companies moved to lockdown and the workplace was not just a structured building or transportation, there were new challenges which the entire population had to face. Club the constant fear of losing job in the wake of a worldwide pandemic with abrupt late night video call requests of sexual nature became rampant. Women employees were not clear whether to report these instances as harassment or not. (Jasrotia et al., 2021) <sup>[12]</sup>.

Workplace harassment is not a singular incident that can be isolated without any impact on the survivors' life. It has a deep psychological and physiological impact on the person who faced the issue (Gale et al., 2019) <sup>[13]</sup>. Many women who face harassment keep to themselves or leave their jobs (McLaughlin et al., 2017) <sup>[14]</sup>. Many who report such harassment face a hostile working environment (Cesario, 2020) <sup>[15]</sup>. It has a financial impact as it can disrupt the career of the woman who reports the incident (McLaughlin et al., 2017) <sup>[14]</sup>.

### **Existing Legislative and Administrative Measures:**

India has a comprehensive legal framework to address sexual harassment, including the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013. The law requires all workplaces with more than ten employees to set up an internal complaints committee to address sexual harassment complaints <sup>[16]</sup>. The law also provides for criminal penalties for sexual harassment, including imprisonment and fines <sup>[16]</sup>. The 1997 Vishaka Judgment was a landmark where the ruling defined changes in law regarding harassment at the workplace. The issue with the ruling and

the law was that it did not cover the unorganised sector. There were numerous amendments to the bill and post Justice Verma committee's recommendation there were provisions added to the law which included the unorganised sector. In 2013 Prevention of Sexual Harassment (POSH) Act was enacted. The POSH Act discussed the harassment of women in both the organised and unorganised sectors. One of the biggest roadblocks in the practical implementation of the Act is that the legislature is dependent on the employer's initiative to implement POSH. Section 7 of the POSH Act talks about tackling the problem of Sexual Harassment, and the formation of a local committee, its tenure, compositions and other factors in its making <sup>[16]</sup>.

Section 2(p) of the POSH Act defines an unorganised sector. The definition includes "any workplace or enterprise owned by individual or self-employed workers engaged in production or sale of goods and services with an employee strength of less than 10 people" <sup>[16]</sup>. Furthermore Section 2(e) of POSH Act defines the remedies for domestic workers where the local committee presiding over the complaint registers a case within seven days under Section 509 of the Indian Penal Code, 1860 which deals with any act, word or gesture intended to insult the modesty of a woman <sup>[16]</sup>.

### **Aim of the article**

The article aims to understand the challenges faced by victims of sexual harassment in the workplace in India and propose solutions to improve access to justice.

### **Research Methodology**

The study is conducted adopting a descriptive RD. Its primary objective was to provide an accurate representation of the prevailing scenario of sexual harassment. A non-probability sampling approach was chosen to facilitate this, primarily employing purposive sampling. Given the reluctance of sexual harassment victims to share their experiences openly, this method was deemed suitable. The study's scope was limited to the Delhi National Capital Region (NCR).

The research's sample comprised women in mid-sized corporate sectors within the same region.

Data for the study was collected through a combination of primary and secondary sources. Primary data collection focused on gathering observations and experiences, while secondary data sources were used to examine legal remedies, amendments to relevant laws, and the Sexual Harassment Act of 2013. This comprehensive approach ensured the research's reliability and depth.

**Results and Analysis:** Complex factors, including gender inequality, patriarchal attitudes, and a culture of impunity, drive sexual harassment in India (Costagliola, 2021) <sup>[17]</sup>. In recent years, there has been a growing awareness of the issue, with more women coming forward to report incidents of harassment (Sultana, 2023) <sup>[18]</sup>. However, there is still a long way to go in addressing the root causes of the problem and ensuring that women can access justice when they experience harassment (Diehl, 2022) <sup>[19]</sup>.

**Position of harasser:** According to the Hiscox Harassment Study, 2018, 73% of harassers were found to be in senior positions within their organisations, and they often exploited their authority to engage in harassment towards their subordinates <sup>[20]</sup>. In the current study, it was seen that approximately 33% of the victims identified the harassers as managers.

These findings reinforce the notion that harassers are often in positions of authority and exploit their power to engage in inappropriate behaviour (McLaughlin et al., 2012) <sup>[21]</sup>. They tend to overestimate the sexual interests of others and believe that women are attracted to them. Such individuals may view the workplace as a platform for sexual encounters and affairs, leading them to engage in behaviours like

leering, standing too closely, lingering their hands inappropriately, and touching women without their consent (Keltner, 2017) <sup>[22]</sup>.

**Skewed gender ratio:** The workplace gender ratio, particularly in patriarchal and orthodox cultures like India, has always favoured males (Singh & Mukherjee, 2022) <sup>[23]</sup>. The disparities in gender ratios become particularly evident when analyzing the data collected from the study: 60% of the organisations have a 5:1 gender ratio while 40% have a 10:1 gender ratio.

Various studies conducted over the years have consistently suggested a strong correlation between male-dominated workplaces, such as the military, law enforcement, or factories, and higher incidents of sexual harassment, compared to workplaces with more balanced gender ratios (1:1 or 2:1). This inherent trait of male dominance holds implications from sociological, criminological, and gender studies perspectives.

**Powerlessness:** A study showed that the distinctive role occupied by women in the civil service introduces significant tensions, stemming from the disparity between how men perceive them and the actual scope of their capabilities. The analysis underscores that women civil servants employ cognitive, emotional, and behavioural defences to reconcile the stark contrast between their experienced powerlessness in the workplace and the social power ostensibly associated with their position. This sheds light on the intricate dynamics women navigate as they endeavour to establish their identity and capabilities within the unique context of the civil service in India (Shrivastava, 2015) <sup>[24]</sup>. Importantly, this sense of powerlessness is not confined to the civil services alone; it manifests in varying degrees across diverse sectors.

**Cavalier attitude:** More than 50% of the respondents said that putting a female colleague or subordinate down or being condescending towards their work is quite common in a workplace environment. This shows the prevalence of condescending behaviour towards women in the workplace (Stamarski & Hing, 2015) <sup>[25]</sup>. It is seen that men often rely on patronising attitudes (Kishore, 2023) <sup>[26]</sup>, using terms such as “honey”, “sweetie”, “darling” and other similar terms of endearment, or ‘mansplaining’ (YouGov, 2017) <sup>[27]</sup> to exert male dominance or over female employees.

**Hindrances in Access to Justice:** Access to justice for victims of workplace harassment in India remains a significant challenge. The issue is complex and multifaceted, with various systemic, social, and cultural factors contributing to it.

**Under-reporting of cases:** One of the significant challenges in addressing workplace harassment in India is the under-reporting of cases. In the current study, it was found that approximately 33% of the victims chose to leave their organisations instead of reporting the harassment. Another 33% of women mentioned that they did not know what their options were after the incident. 17% of the respondents opted to remain silent or continue working within the same organisation/office following their ordeal. Various studies also support the findings that distrust in the system, fear of social stigma, and concerns about credibility often contribute to the underreporting of workplace harassment cases (Singh, 2019). According to a report by the Indian Bar Association, only 7% of women who experience workplace harassment report it to the appropriate authorities (IBA, 2017) <sup>[5]</sup>.

**Lack of awareness and sensitisation:** Another issue in access to justice for victims of workplace harassment is the lack of awareness and sensitisation among employees, employers, and the general public. Many people are not aware of what constitutes harassment, and this lack of understanding can lead to victim-blaming and stigmatisation of the victim (Ahmed, 2022) <sup>[34]</sup>.

**Inadequate legal framework:** Although India has a legal framework to address workplace harassment, protecting the victim's rights and providing redressal is not always adequate. For instance, the definition

of sexual harassment under the law is restrictive and does not include non-sexual forms of harassment (The Hindu, 2023) <sup>[35]</sup>.

**Lack of infrastructure and resources:** There is a severe lack of infrastructure and resources to support victims of workplace harassment. This includes inadequate facilities to register complaints, a lack of trained personnel to handle cases, and insufficient support services for victims (Nishith Desai Associates, 2023) <sup>[36]</sup>.

**Gender bias and discrimination:** Gender bias and discrimination continue to be a significant issue in access to justice for victims of workplace harassment. Women, in particular, face discrimination and harassment at every stage of the legal process, including filing a complaint, investigation, and trial (Tannvi & Narayana, 2022) <sup>[37]</sup>.

**Shame and humiliation:** In India's patriarchal setup, women find it difficult or almost impossible to voice out their concerns due to fear of humiliation (Sharma, 2017) <sup>[38]</sup>.

**Denial and minimisation:** Survivors, initially shocked, often resort to denial as a defence mechanism against harassment, leading to potential depression. Coping strategies may be dismissed as commonplace, and survivors may be advised to keep quiet, hindering acknowledgement of the issue. Excuses for perpetrators' behaviour, like feeling sorry for them or attributing actions to intoxication, further obstruct recognising the severity of the situation (Sambaraju, 2020) <sup>[39]</sup>.

**Fear of repercussions:** The fear of speaking out against superiors or powerful figures discourages reporting harassment. Concerns about job loss, remote transfers, threats to families, and being passed over for promotions contribute to the silence of survivors. Apprehension regarding credibility and the exhausting scrutiny involved results in the underreporting of workplace harassment cases and discourages victims from speaking up or reporting the incidents (Indian National Bar Association, 2017) <sup>[5]</sup>.

**Learned helplessness:** Many survivors feel powerless and believe they can't take action against abuse or harassment. Lack of support and witnessing others facing similar situations reinforce the perception that staying silent is the wisest course. A lack of trust in the legal system further discourages survivors from seeking help (Juneja, n.d.) <sup>[40]</sup>.

**Lack of information:** Organisations often lack orientation programs and fail to provide literature on workplace harassment policies. Insufficient awareness in the media about country laws contributes to women being unclear about what constitutes sexual harassment (Mehta, 2021) <sup>[41]</sup>.

**Other reasons:** Various factors, such as Post-Traumatic Stress Disorder (PTSD) (Yie & Ping, 2021) <sup>[42]</sup>, reluctance to relive trauma, and the influence of substances like drugs or alcohol, contribute to underreporting. Gaslighting, manipulation, and other psychological factors further impede victims from coming forward and accessing justice.

### **Workplace policies and practices**

When surveying organisations about their workplace policies and practices, the following key findings were observed:

Approximately 60% of respondents indicated that their organisation has a well-defined sexual harassment policy.

Regarding the existence of a No-Retaliation Policy that protects the complainant against actions from the accused or the perpetrator, 28% of respondents mentioned incorporating such a policy within their whistle-blowing and sexual harassment policies.

Around 20% of the surveyed organisations reported having a well-defined process for reporting harassment or sexual misconduct. Additionally, they provide specialised training for their Human Resources or relevant departments to manage sexual harassment cases.

16% of organisations conduct occasional talks on sexual harassment and offer training on this topic for all employees, including senior management.

A smaller fraction, accounting for 14% of organisations, stated the incorporation of mandatory training on workplace harassment policies during orientation or induction programs.

It is worth noting that none of the surveyed Indian organisations reported implementing these practices. Only umbrella organisations of UK and US Multinational Corporations (MNCs) responded in this manner.

A separate study conducted by FICCI in collaboration with Ernst and Young in 2015 <sup>[43]</sup>, focusing on private organisations in India, revealed that a substantial 70% of organisations did not specify clear penal consequences for sexual harassment in the workplace. The study also highlighted that 50% of small and medium-sized organisations were non-compliant with The Prevention of Sexual Harassment Act, 2013.

Furthermore, in the FICCI-EY survey, 71% of employees from small and mid-sized organisations noted the absence of an orientation module regarding workplace harassment policies.

These findings underscore the critical necessity for the establishment of explicit and mandatory no-tolerance policies for workplace harassment. Such policies are crucial to promote reporting and prevent incidents from going unreported.

**Measures for Easy Justice:** There is a need for a multi-pronged approach to address the issue of sexual harassment in India. This includes improving the legal and administrative framework, raising awareness about the issue, and creating safe spaces for women to report incidents of harassment.

### **Implementation of the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013**

The Act mandates every organisation with more than ten employees to set up an internal complaints committee (ICC) to address complaints of sexual harassment<sup>16</sup>. The ICC should comprise at least one external member who can represent an NGO or a women's rights group to ensure impartiality and transparency in the complaint redressal process<sup>16</sup>. The Act also requires the employer to provide a safe and secure work environment, including training and sensitizing employees about the issue <sup>[16]</sup>. According to a survey by the Indian Bar Association, only 37% of companies in India have implemented the Act <sup>[16]</sup>. The study also found that companies that had not implemented the Act had a higher incidence of sexual harassment complaints <sup>[16]</sup>. Therefore, employers must know the importance of implementing the Act and its provisions.

**Fast-track courts for sexual harassment cases:** Fast-track courts can help ensure that sexual harassment cases are resolved quickly and justice is served. The Supreme Court of India has directed all states to establish fast-track courts to deal with cases of sexual assault and harassment <sup>[44]</sup>. According to the National Crime Records Bureau, 94% of rape cases in India are still pending in court, with the average time to dispose of cases being six years <sup>[2]</sup>. This highlights the need for fast-track courts to ensure that victims of workplace harassment receive justice on time.

**Sensitisation and training programs for employees and employers:** One of the reasons for the prevalence of workplace harassment is the lack of awareness and sensitivity towards the issue <sup>[45]</sup>. In a study published in NUJS Law Review, it was suggested that there is a need for a legal shift to penalise any gender-based behaviour fostering a hostile work environment. Additionally, it suggests replacing internal complaint systems with external regulators empowered to punish employers and offer victims a wider range of support options <sup>[45]</sup>. Therefore, it is essential to conduct regular sensitisation and training programs for employees and employers to create awareness about the issue, its impact, and ways to prevent it.

### Conclusion:

Access to justice for victims of sexual harassment in India remains a formidable challenge, woven into the fabric of societal norms, power dynamics, and systemic shortcomings. The study unravels the intricate layers of this pervasive issue, shedding light on the widespread prevalence and profound impact on women across various sectors. Despite legislative measures, hindrances such as under-reporting, lack of awareness, and gender bias persist, creating a formidable barrier to justice. Organisational practices reveal disparities in policy implementation, demanding urgent attention and universal adoption of robust workplace policies. A parallel study on private organisations underscores the critical need for clear penal consequences and compliance. The conclusion advocates a multi-pronged approach, emphasising the pivotal role of legal frameworks, fast-track courts, and extensive sensitisation programs. It calls for collective efforts to dismantle ingrained barriers and foster a safer, more just environment for victims of workplace harassment. Only through concerted action can India hope to bridge the gap between legislation and justice, ensuring a workplace free from the scourge of sexual harassment.

### Endnotes

1. Rainn (n.d.). Scope of the problem: Statistics. Retrieved from <https://www.rainn.org/statistics/scope-problem>, page accessed 3.8.2022
2. National Crime Records Bureau (2022). CII 2022 snapshots: State and UTs. *Government of India*
3. Legal Readings (2021). Increase in unreported crimes in India. Available at: <https://legalreadings.com/increase-in-unreported-crimes-in-india/>, page accessed 1.4.2023
4. Oxfam India (2022). *India Discrimination Report 2022*. Oxfam India.
5. Indian National Bar Association (2017). Sexual harassment at workplace. (pp. ISBN 978-73-83600-29-4). Prabhat Books.
6. Johnson, S. K. (2021). Why we fail to report sexual harassment. *Harvard Business Review*. Available at: <https://hbr.org/2016/10/why-we-fail-to-report-sexual-harassment>, page accessed 03.10.2022
7. Masood, Q. H. (2015). Women workers in unorganized sector in India: Problems and prospects. *South Asian Journal of Multidisciplinary Studies*, 2(4), 82-87.
8. Rashmi Shukla, S. T., & Singh, T. (2016). Women employment in unorganised sector in India: An empirical analysis. *Journal of Rural Development*, 35(4), 645-664.
9. Ravindran, S., Shah, M. (2023). Unintended consequences of lockdowns, COVID-19 and the Shadow Pandemic in India. *National Human Behaviour*, 7, 323–331. <https://doi.org/10.1038/s41562-022-01513-5>.

10. Chowbey, Punita. (2023). How COVID-19 pandemic enabled new forms of economic abuse of Indian women. *The New Indian Express*. Available at: <https://www.newindianexpress.com/nation/2023/Dec/01/how-covid-19-pandemic-enabled-new-forms-of-economic-abuse-of-indian-women-2637860.html>, page accessed 1.2.2024
11. Express News Service (2021) 'After Covid, cases of online harassment spiked by 5 times.' *The Indian Express*, 7 January.
12. Jasrotia, A., & Meena, J. (2021). Women, work and pandemic: An impact study of COVID-19 lockdown on working women in India. *Asian Social Work and Policy Review*, 15(3), 282-291.
13. Gale, S., Mordukhovich, I., Newlan, S., & McNeely, E. (2019). The impact of workplace harassment on health in a working cohort. *Frontiers in Psychology*, 10, 446151.
14. McLaughlin, H., Uggen, C., & Blackstone, A. (2017). The economic and career effects of sexual harassment on working women. *Gender & Society: Official Publication of Sociologists for Women in Society*, 31(3), 333.
15. Cesario, B. (2020). Attitudes about victims of workplace sexual harassment based on sex. *Current Research in Behavioural Sciences*, 1, 100006.
16. Bare Act. (2013). *The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act*. Commercial Law Publishers India (Pvt.) Ltd. ISBN-13: 9789356038479
17. Costagliola, A. (2021). Labor participation and gender inequalities in India: Traditional gender norms in India and the decline in the Labor Force Participation Rate (LFPR). *The Indian Journal of Labour Economics*, 64(3), 531–542.
18. Sultana, N. (2023), India Inc sees alarmingly high unresolved sexual harassment cases at workplace. *Forbes India*. Retrieved from Available at: <https://www.forbesindia.com/article/take-one-big-story-of-the-day/india-inc-sees-alarmingly-high-unresolved-sexual-harassment-cases-at-workplace/89043/1>, page accessed 22.12.2023
19. Diehl, A. (2022). Research: How bias against women persists in female-dominated workplaces. *Harvard Business Review*. Available at: <https://hbr.org/2022/03/research-how-bias-against-women-persists-in-female-dominated-workplaces>, page accessed 2.3.2023
20. Admin (2018). *Gender, seniority key factors in workplace harassment: Hiscox survey*. Available at: <https://www.hiscox.com/documents/2018-Hiscox-Workplace-Harassment-Study.pdf>, page accessed 3.10.2022
21. McLaughlin, H., Uggen, C., & Blackstone, A. (2012). Sexual harassment, workplace authority, and the paradox of power. *American Sociological Review*, 77(4), 625–647.
22. Keltner, D. (2017). What the Science of Power Can Tell Us about Sexual Harassment. *Greater Good Magazine*. Available at: [https://greatergood.berkeley.edu/article/item/what\\_the\\_science\\_of\\_power\\_can\\_tell\\_us\\_about\\_sexual\\_harassment](https://greatergood.berkeley.edu/article/item/what_the_science_of_power_can_tell_us_about_sexual_harassment), page accessed 3.10.2022
23. Singh, R., & Mukherjee, P. (2022). Exploring Reasons for Low Female Labour Force Participation in Regular Salaried Jobs: Evidence from Young Lives Longitudinal Study in India. *Indian Journal of Human Development*, 16(2), 267–285.
24. Shrivastava, H. (2015). Harassment at the Workplace, Powerlessness and Identity: Experiences of Women Civil Servants in India. *Indian Journal of Gender Studies*, 22(3), 437-457.



25. Starnski, C. S., & Hing, L. S. S. (2015). Gender inequalities in the workplace: the effects of organisational structures, processes, practices, and decision makers' sexism. *Frontiers in Psychology*, 6,1400. doi: 10.3389/fpsyg.2015.01400.
26. Kishore, S. (2023). Exploring Indian Women's Understanding of Benevolent Sexism. *International Journal of Indian Psychology*, 11(2), 367-383. doi: 10.25215/1102.037
27. YouGov. (2017) Eight in 10 Indian women have faced "mansplaining." Available at: [business.yougov.com](http://business.yougov.com), page accessed 4.8.2023
28. Raj, A., Johns, N. E., & Jose, R. (2020). Gender parity at work and its association with workplace sexual harassment. *AAOHN Journal*, 68(6), 279–292. doi: 10.1177/2165079919900793
29. Steffens, M. C., Viladot, M. À., & Scheifele, C. (2019). Male majority, female majority, or Gender Diversity in organisations: How do proportions affect gender stereotyping and Women Leaders' Well-Being? *Frontiers in Psychology*, 10. Doi: 10.3389/fpsyg.2019.01037
30. Glicken, M. D., & Robinson, B. C. (2013). Treating Worker Dissatisfaction During Economic Change, *Elsevier eBooks*, 59–79, doi: 10.1016/C2011-0-06999-5
31. Chesney-Lind, M., & Chagnon, N. (2016). Criminology, gender, and race. *Feminist Criminology*, 11(4), 311–333. doi: 10.1177/1557085116633749
32. Sanday, P. (2001). Male dominance. *International Encyclopedia of the Social & Behavioural Sciences*, 9143–9147, ISBN 9780080430768, doi: 10.1016/B0-08-043076-7/03976-0.
33. Singh, A. (2019), From reel to real life, challenges faced by women in police are manifold. The Wire. Available at: <https://thewire.in/women/number-of-women-in-police-force-rises-but-falls-short-of-the-mandated-33-target-govt-data>, page accessed 5.12.2023
34. Ahmed, J. S. (2022). Mental Harassment at Workplace: Are We Aware? *International Journal of Research and Review*, 9(4), 147–151.
35. Munjal, D. (2023). Explained | What is the PoSH Act and why has the Supreme Court flagged lapses in its implementation? The Hindu. 20 May.
36. Nishith Desai Associates. (2023). Prevention of Sexual Harassment at the Workplace (POSH)- India Legal & HR Considerations. Available at: [https://www.nishithdesai.com/fileadmin/user\\_upload/pdfs/Research%20Papers/Prevention\\_of\\_Sexual\\_Harassment\\_at\\_Workplace.pdf](https://www.nishithdesai.com/fileadmin/user_upload/pdfs/Research%20Papers/Prevention_of_Sexual_Harassment_at_Workplace.pdf), page accessed 5.12.2023
37. Tannvi, T., & Narayana, S. (2022). The challenge of gender stereotyping in Indian courts. *Cogent Social Sciences*, 8(1). doi: 10.1080/23311886.2022.2116815.
38. Sharma, K. (2017). Sexual Harassment of Women at Workplace in India: An Ubiquitous Hazard. *IOSR Journal Of Humanities And Social Science (IOSR-JHSS)*, 22(9), Ver. 9, 36–46. ISSN: 2279-0845
39. Sambaraju, R. (2020). "I Would Have Taken This to My Grave, Like Most Women": Reporting Sexual Harassment during the #MeToo movement in India. *Journal of Social Issues*, 76(3), 603–631
40. Juneja, P. (n.d.). What is Learned Helplessness and How it Harms the Victims of Workplace Discrimination. Management Study Guide. Available at: <https://managementstudyguide.com/what-is-learned-helplessness-and-how-it-harms-the-victims-of-workplace-discrimination.htm>, page accessed 10.8.2022
41. Mehta, M. (2021). The Inefficacy of Internal Complaint Mechanisms in Resolving Sexual Harassment Claims - A Study in the Context of Sexual Harassment Law and #MeToo in India. *NUJS Law Review*, 14 (3), 412-467.

42. Yie, C. E., & Ping, N. T. S. (2021). Sexual Harassment in Workplace: A literature review. *International Journal of Humanities & Social Studies*, 9(8), 29-34.
43. FICCI. (2015). Fostering safe workplaces - Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act. Available at: [https://www.cquel.com/posh/wp-content/uploads/2016/11/FICCI\\_report\\_nov\\_2015.pdf](https://www.cquel.com/posh/wp-content/uploads/2016/11/FICCI_report_nov_2015.pdf), page accessed 4.8.2022
44. Department of Justice. India. (n.d.). Fast Track Special Courts (FTSCs). Available at: <https://doj.gov.in/fast-track-special-court-ftscs/#:~:text=Since%20October%202019%2C%20the%20Department,Officer%20and%207%20Staff%20Members>, page accessed 6.10.2022
45. Qayyum, Sara & Ul Haq, Muhammad Hasham & Rafiq, Hassan & Yasin, Fouzan & Ahmed, Ayesha. (2021). Harassment: Causes, Effects, Solutions. doi: 10.13140/RG.2.2.27637.19687, page accessed 11.4.2023