

## ***Protection of Women under Indian Constitution and Criminal Law : Impact Assessment***

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*Indian Constitution emphasizes that all citizens (including women) are equal in the eyes of the law. They are also entitled for the equal protection of laws. It signifies that all people, irrespective of their sex, should be treated equally in similar circumstances. Not only this, the principle of gender equality is enshrined in the Indian Constitution in its Preamble. To achieve this goal, a number of measures have been taken not only to protect women from all forms of social discrimination, violence and atrocities, but also provide them all opportunities to women as equal to men so that they can contribute to the development of the nation. The present paper is an impact assessment study of protection of women under Indian Constitution and Criminal Law. Secondary sources have been used to demonstrate that women still are victim of various types of atrocities and discrimination within family, workplaces and the society at large. It is true that there have been many significant changes in the status of women in Indian society after seven decades of attaining independence, still the goal of gender equality is a distant goal there is need to change the patriarchal mind-set of people.*

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## **1. Introduction**

For comprehensive and holistic advancement of any nation, all-round development of the personality of its citizens is very important. The discrimination between women and men works to damage national development. Women are the axis of the family and the family being an important social unit is the basis of the society. The contribution of Indian women in the fight for independence resulted in the new type of social awareness and they did not have to fight for the franchise, while in spite of immense progress in many countries of Europe, women have got equality and voting rights much later. In our vast country, despite the proportion of women being almost equal to men, both are unequal in many areas of life. Even though the Constitution prohibits discrimination on the basis of sex and stresses equality for all in India, in reality it is common practice for women to suffer abusive behaviour, sexual harassment by high officials and male colleagues at workplaces. Today's independent women have many problems at every step like abortion in case of a girl child in the womb, murder of infants, neglect in treatment of girls during illness, aversion in educating adolescent girls, rape and harassment of women, immoral trafficking, and are struggling with many problems at a young age. Not only has the government made many efforts to address these problems, but women have also been provided protection under the Indian Constitution and criminal law. The present paper attempts to explain these protective measures in detail on the basis of secondary data.

## **2. Protection of Women under Indian Constitution**

In India, women are included in the weaker sections of society because their place in terms of education, employment and power is much lower than men. Therefore, after independence, the government has adopted a clear policy to provide all opportunities to women as equal to men and to emphasize gender equality under which women welfare is clearly given priority. A national scheme for women has been started in the entire country since 1976. This scheme gives instructions for framing policies and programmes for women's welfare and development. The Bureau of Women in the Department of Women and Child Development is the national institution for the implementation and coordination of policies and programmes. Keeping in mind that improving economic status of

women helps in raising their normal status, emphasis has been laid on programmes to increase women's income. In order to revive the ongoing development programmes for women and children, a separate department for women and child development has been set up in the Ministry of Human Resource Development in September 1985. Government departments formulate policies to protect women by keeping women in front of the provisions available under the Indian Constitution.

The principle of gender parity (equality) is enshrined in the Preamble, Fundamental Rights, Fundamental Duties and Directive Principles of the Indian Constitution. The Constitution not only gives equal rights to women, but also mandates states to adopt protective discrimination in favour of women. Under the framework of democratic polity, our laws, developmental policies, schemes and programmes are aimed at the advancement of women in various fields. India has ratified from time to time the international conventions and human rights provisions to give equal rights to women. The most important of these is the 'Conference on Prevention of All Kinds of Discrimination against Women' (SIDA) held in 1993. SIDA is an international agreement to remove all forms of discrimination against women. Along with this, the Protection of Women from Domestic Violence Act 2005, Pre-conception and Pre-natal Diagnostic Techniques (Prohibition of Sex Selection) Act (PCPNDT Act), 2003 is a new legal measure by the government to improve the status of women.

The rights available to women have been mentioned in many articles of the Indian Constitution and provisions have also been put in place. In these articles 14, 15(1), 15(3), 16, 16(2), 23(1), 39(a), 39(d), 39(e), 42, 46, 47, 51-A(e), 243-D(3), 243-D(4), 243-T(3) and 243-T(4) are the main ones. The following are the provisions made in these articles :

1. Equality of women before law [Article 14],
2. State shall not discriminate against any citizen of India on the basis of gender [Article 15(1)],
3. The state will be empowered to make any specific provision for women. In other words, the state can make provision for positive discrimination for women [Article 15(3)],

4. Equal opportunities will be available to all citizens for the employment under the state or for appointment to any post [Article 16],
5. There shall not be any discrimination or disqualification on the basis of gender for employment or post with any citizen [Article 16(2)],
6. Human trafficking and forced labour will be prohibited [Article 23(1)],
7. On the right to adequate means of living, there will be equality between men and women [Article 39(a)],
8. The state will have to provide equal pay to Indian men and women for equal work [Article 39(d)],
9. The state shall ensure that there is no misconduct with the health and strength of women employees and they will not be compelled to undertake such an occupation on the basis of economic necessity which may be inappropriate in terms of their strength [Article 39(e)],
10. Government will make provision for just and humane conditions of work and maternity relief [Article 42],
11. The state will take special care of the educational and economic interests of the people of weaker sections and encourage them to be protected from social injustice and all forms of exploitation [Article 46],
12. State will raise the level of nutrition and standard of living of its people [Article 47],
13. It will be the duty of all Indian citizens that they will condemn the practices which are about to dishonour the dignity of women [Article 51-A(e)],
14. In the panchayat, one-third of the total seats scheduled for direct election will be reserved for women [Article 243-D(3)],
15. The posts of one-third of the chairpersons of all level of panchayats will be reserved for women [Article 243-D(4)],
16. One-third of the seats to be filled by direct election for each municipality will be reserved for women [Article 243-T(3)] and
17. One-third of the posts of chairpersons of municipalities will be reserved for women [Article 243-T(4)].

Therefore, it is clear that many provisions have been made in the Indian Constitution for the protection of rights of women.

### **3. Protection of Women under Criminal Laws**

In order to fulfill the constitutional mandate, the state has also taken several statutory measures to provide respect, rights to women, counteract all forms of social discrimination, violence and atrocities, and provide support services to working women. Crimes against women such as murder, robbery, fraud, sexual harassment, immoral trafficking etc. have been divided into two categories—the Indian Penal Code and the offence under specific and local law.

The main offences under the Indian Penal Code are as follows :

1. Rape (Section 375-377),
2. Kidnapping and abduction of women for various purposes (Sections 363-373),
3. Homicide for dowry, dowry killing or attempt to kill (Sections 302/304-B),
4. Mental or physical torture of women (Section 498-A)
5. Assault or criminal force to woman with intent to outrage her modesty (Section 354),
6. Sexual harassment (Section 509) and
7. Importation of girls up to 21 years (Section 366-B).

Following are the Acts related to major crimes against women under specific and local laws :

1. Minimum Wages Act, 1948;
2. The Special Marriage Act, 1954;
3. The Hindu Marriage Act, 1955;
4. The Hindu Succession Act, 1956 (Amended in 2005);
5. The Immoral Traffic (Prevention) Act, 1956;
6. The Maternity Benefit Act, 1961 (Amended in 1995);
7. The Dowry Prohibition Act, 1961 (Amended in 1986);
8. The Indian Divorce Act, 1969;
9. The Contract Labour (Regulation and Abolition) Act, 1970;
10. The Act relating to abolition of pregnancy on medical grounds (Medical Termination of Pregnancy Act), 1971;
11. The Equal Remuneration Act, 1976;
12. Criminal Law (Amendment) Act, 1983;

13. Family Courts Act, 1984;
14. The Indecent Representation of Women (Prohibition) Act, 1986;
15. The Commission of Sati (Prevention) Act, 1987 (3 of 1988);
16. Legal Services Authorities Act, 1987;
17. Pre-Conception and Pre-Natal Diagnostic Techniques (Prohibition of Sex Selection) Act, 1994;
18. The Protection of Women from Domestic Violence Act (PWDVA), 2005;
19. The Prohibition of Child Marriage Act, 2006;
20. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and
21. The Criminal Law (Amendment) Act, 2013.

#### **4. Special Provisions for Women**

In addition to the measures taken for the protection of women under the Indian Constitution and criminal law, the government has also made the following four special provisions :

- 1. National Commission for Women :** In January 1992, the Government constituted this Commission as a statutory body with the objective of monitoring matters related to constitutional and legal safeguards provided to women and to revise and give suggestions for amending the current laws.
- 2. Reservation for women in local self-government :** One-third of the seats in all elected posts of rural and urban local bodies (from the village level to the intermediary block committee, i.e., *Panchayat Samiti* to the district level i.e., *Zilha Parishad* have been reserved for women by the 73<sup>rd</sup> and 74<sup>rd</sup> Constitutional Amendment Act, 1992 passed by Parliament and enacted on April 24, 1993. The provisions of the these Amendment had far reaching consequences for the empowerment of women. The act has been the most significant for the reservation for women as well as Scheduled Caste and Scheduled Tribes.
- 3. National Action Plan for Girl Child, 1991-2000 :** The National Scheme for Children is meant for their survival, protection and development so as to ensure a good future for them by seeking to prevent female foeticide and infanticide,

eliminating gender discrimination, providing safe drinking water and fodder near homes, rehabilitating and protecting girls from exploitation, assault and abuse. This plan provides relief for those girls who are economically and socially deprived and who belong to special groups. Emphasis is also given to educate and sensitize male members of the family to the special needs of the girl child.

4. **National Policy for Empowerment of Women, 2001** : The National Policy for Empowerment of Women was implemented in 2001 by the government. The objective of this national policy is to ensure the progress, development and empowerment of women and to eliminate all forms of discrimination against women and ensure that they participate in every sphere of life and activity. Under this policy, there is a provision to end discrimination against women, strengthen law and order for their rights and provide better health facilities to them. In this direction, the development of women has been kept in mind in all policies and programmes of the government.

Although the above four special measures for women are important, the National Policy for Empowerment of Women, 2001 is considered to be the most paramount. A national action plan has been prepared to achieve the goal of this policy. To achieve the goal of gender equality, the government has taken several steps towards total empowerment of women. The government's plan has moved beyond the purely welfare measures of women to an effort to bring them to the center of development and mainstream. Efforts are being made to create a society for women where they feel empowered, self-reliant, healthy and safe.

A new programme of 'National Women's Empowerment Mission' (NMEW) has been launched on March 7, 2010 with the objective of socio-economic and educational empowerment of women by combining the programmes of various ministries and state governments. This mission sets the policy guidelines for women empowerment at the national level. In order to make this scheme successful, NMEW has been empowered to hold inter-regional conferences of various ministries/departments to identify institutional and structural barriers affecting women. Expert in areas such as poverty alleviation, social empowerment, health and nutrition, gender budgeting, gender rights and law implementation,



empowerment of marginalized and vulnerable women, media awareness, mass communication and information technology have been made the Executive Director and member of the Mission. State Women Resource Centers have been set up in the states.

National Women Empowerment Mission prepared an action plan for 2012 to 2015 for giving priority to women empowerment for their all-round development. The mission has made a unique beginning for women in a new model of convention centers called 'Poorna Shakti Kendra'. These centers are dedicated to assisting women through various government programmes in selected districts of the country. The village coordinator in the centers reaches out to women with the goal of '*hum sunenge nari ki baat*' (we will listen to the woman's talk). The following works are being done at full power centers :

1. Information on all government schemes/services/programmes for women.
2. Preparation of database of target population.
3. Raising awareness of constitutional rights.
4. To make available the government's schemes/services/programmes on health, education and livelihood and make it easy for people to access them.
5. Training and capacity building on various matters like leadership and constitutional rights.
6. Organizing women to access various resources.
7. Co-ordination for obtaining the services provided by various departments.

The major areas of priority of the mission are as follows :

1. The declining sex ratio of children.
2. Increasing crime against women.
3. Child marriage.
4. Gender budget and gender mainstreaming.
5. To get girls enrolled in school under the right to education.
6. To bring the exploited and marginalized people (including women and girls) into the mainstream.
7. Buying of minor girls and women.



The Mission is making considerable efforts to address the declining sex ratio in children. In this regard, efforts are being made by the government to raise awareness with the help of media towards making the Pre-Conception and Pre-natal Diagnostic Techniques (Prohibition of Gender Selection) Act, 1994 at the national, state and district levels. Not only this, in 2016, efforts were being made to make this policy more useful.

It is clear from the above discussion that not only adequate constitutional provisions have been made, but a number of measures have also been included in criminal laws to protect women in India.

## **5. Impact Assessment of Constitutional Provisions and Criminal Laws for Protection of Women**

After seven decades of attaining independence, there have been many significant changes in the status of women in Indian society. Education and employment opportunities have increased for them. Their involvement in politics has increased due to a policy of protective discrimination. Today they are working together with men in all fields of life. In this context, the question arises whether the provisions of constitutional and criminal laws made for women have been successful in providing security to them, in protecting their rights or not? Are they safe within the family, outside the family and at the workplace or not? Are they able to leave the house at any time without any fear or not? These are questions related to the assessment of protective discrimination provisions made for women as well as constitutional provisions and criminal laws for protection of women.

If we evaluate these provisions objectively, we find that the desired results have not been achieved. Today, the crimes against women are increasing continuously. This can be confirmed by the statistics of the last three years of the Crime Records Bureau, the organization that compiles crime related data under the Ministry of Home Affairs. In 2014, a total of 3,39,457 cases related to crimes against women were registered.<sup>1</sup> In 2015 and 2016, this number was 3,29,243 and 3,38,954 respectively.<sup>2,3</sup> Most of the cases reported in 2016 were related to atrocities committed by husband or his relatives (1,10,378). West Bengal (19,302), Rajasthan (13,811) and Uttar Pradesh (11,156) were the three states in which the highest number of such cases were reported.

In 2016 alone, a total of 84,746 cases were registered for assaulting women with the intention of insulting their decency. Maharashtra (11,396), Uttar Pradesh (11,335) and Madhya Pradesh (8,717) are the three states in which the highest number of crimes were recorded in this category. In the same year, a total of 64,519 cases of kidnapping and abduction were registered, of which the most were reported from Uttar Pradesh (12,994), Maharashtra (6,170) and Bihar (5,496). A total of 38,947 incidents of rape were reported, of which maximum occurred in Madhya Pradesh (4,882), Uttar Pradesh (4,816) and Maharashtra (4,189). Delhi (2,155) was paramount among the Union Territories. Many scholars have even called Delhi the rape capital. The sad thing is that even 4-5 year old girls are being made victims of rape.

Picture is not good if we look at data released for the years 2017 and 2018 under the head 'crimes against women' as a total of 359849 cases were registered in 2017 under both IPC and SLL, which showed an increase in 2018 with a total of 378277 cases.<sup>4,5</sup> The ranking of states in 2018 showed that Uttar Pradesh was on top (59445 cases), followed by Maharashtra (35497 cases), West Bengal (30394 cases) and Madhya Pradesh (28942 cases). Among union territories, Delhi with 13640 cases was on top as usual. Majority of cases under crimes against women out of total IPC crimes against women were registered under 'Cruelty by Husband or His Relatives' (31.9%) followed by 'Assault on Women with Intent to Outrage her Modesty' (27.6%), 'Kidnapping & Abduction of Women' (22.5%) and 'Rape' (10.3%). The crime rate per lakh women population is 58.8 in 2018 in comparison with 57.9 in 2017.

So far as kidnapping and abduction is concerned, a total of 1,05,734 cases were registered during 2018, which showed an increase of 10.3% over 2017 (95,893 cases). Not only this, a total of 1,05,536 (24,665 male and 80,871 female) victims were reported kidnapped or abducted, out of which 63,356 (15,250 male and 48,106 female) victims were children and 42,180 (9,415 male and 32,765 female) victims were adult during 2018. The recovery rate was not as bad during 2018, when a total of 92,137 kidnapped or abducted persons (22,755 male and 69,382 female) were found out by the police. Of these cases, 91,709 persons were recovered alive and 428 persons were dead.

Other IPC crimes against women also show very dismal picture with a total of 294 cases of most heinous crime of Murder with

Rape/Gang Rape in 2018. Assam with 66 cases was on top, followed by Madhya Pradesh with 46 cases and Uttar Pradesh with 41 cases. The situation regarding Dowry Deaths (Sec. 304B IPC) goes on unabated with a total of 7166 cases in 2018 with Uttar Pradesh on the top (2444 cases), followed by Bihar (1107 cases) and Madhya Pradesh (547 cases). 5037 cases were registered for Abetment to Suicide of Women under Sec. 305/306 IPC in 2018. Maharashtra was on top with (881 cases), followed by Madhya Pradesh (584 cases), Telangana and West Bengal (both 445 cases each).

Some of the other crimes against women reported under IPC in 2018 are as follows :

- ▶ Miscarriage (Sec. 313 & 314 IPC) : 213 cases;
- ▶ Acid Attack (Sec. 326A IPC) : 131 cases;
- ▶ Attempt to Acid Attack (Sec. 326B IPC) : 32 cases;
- ▶ Cruelty by Husband or his relatives (Sec. 498 A IPC) : 1,03,272 cases;
- ▶ Kidnapping & Abduction of Women (total) : 72,751 cases:
- ▶ Kidnapping & Abduction (Sec. 336 IPC) : 30,026 cases;
- ▶ Kidnapping & Abduction in order to Murder (Sec. 364 IPC) : 195 cases;
- ▶ Kidnapping for Ransom (Sec. 364A IPC) : 82 cases;
- ▶ Kidnapping & Abduction of Women to compel her for marriage (Sec. 366 IPC) : 33,354 cases :
  - Women (18 years and above) : 19,832 cases and
  - Girls below 18 years : 13,522 cases.
- ▶ Kidnapping and Abduction of Women – Others (Secs.363A, 365, 367, 368, 369 IPC) : 6,051 cases.
- ▶ Procuration of Minor Girls (Sec. 366A IPC) : 3,039 cases;
- ▶ Importation of Girls from Foreign Country (Sec. 366B IPC) : 4 cases;
- ▶ Human Trafficking (Sec. 370 & 370A IPC) : 854 cases;
- ▶ Selling of Minor Girls (Sec. 372 IPC) : 40 cases;
- ▶ Buying of Minor Girls (Sec. 373 IPC) : 8 cases;
- ▶ Rape (Sec. 376 IPC) : Total cases : 33,356 :
  - Women (18 years and above) : 24,044 cases and
  - Girls below 18 years : 9,312 cases.

- ▶▶ Attempt to Commit Rape (Sec. 376/511 IPC) : Total cases : 4,097 :
  - Women (18 years and above : 3,652 cases and
  - Girls below 18 years : 445 cases.
- ▶▶ Assault on Women with Intent to Outrage her Modesty (Sec. 354 IPC) : Total cases : 89,097
  - 18 years and above : 81,067 cases and
  - Girls below 18 years : 8,030 cases.
- ▶▶ Insult to the Modesty of Women (Sec. 509 IPC) : Total cases : 6,992 :
  - 18 years and above : 6,820 cases and
  - Girls below 18 years : 172 cases.

A total 3,78,277 cases concerning crimes against women were reported under SLL in 2018. They are as follows :

- ▶▶ Dowry Prohibition Act, 1961 : 12,826 cases;
- ▶▶ Immoral Traffic (Prevention) Act, 1956 (Total) : Total 1,459 cases :
  - Procuring, inducing Children for the sake of prostitution (Section 5) : 253 cases,
  - Detaining a person in premises where prostitution is carried on (Section 6) : 143 cases,
  - Prostitution in or in the vicinity of public places (Section 7) : 172 cases,
  - Seducing or soliciting for purpose of prostitution (Section 8) : 120 cases and
  - Other Sections under ITP Act : 771 cases;
- ▶▶ Protection of Women from Domestic Violence Act, 2005 : 771 cases;
- ▶▶ Cyber Crimes/Information Technology Act (Women Centric Crimes only) : Total 1,244 cases :
  - Publishing or Transmitting of Sexually Explicit Material (Sec. 67A/67B (Girls) IT Act) : 862 cases and
  - Other Women Centric Cyber Crimes (Ex. Blackmailing/Defamation/Morphing/Fake Profile) : 388 cases;
- ▶▶ Protection of Children from Sexual Violence Act (Girl Child Victims only) : Total 38,802 cases :

- Child Rape (Sec. 4 & 6 of POCSO Act)/ Sec. 376 IPC) : 21,401 cases,
  - Sexual Assault of Children (Sec. 8 & 10 of POCSO Act) / Sec. 354 IPC) : 14,124 cases,
  - Sexual Harassment (Sec. 12 of POCSO Act) / Sec. 509 IPC) : 1,651 cases,
  - Use of Child for Pornography/Storing Child Pornography Material (Sec. 14 & 15 of POCSO Act) : 781 cases,
  - POCSO Act (Sections 17 to 22) / Other offences of POCSO Act : 804 cases and
  - POCSO Act r/w Section 377 IPC / Unnatural Offences : 41 cases; and
- ▶▶ Indecent Representation of Women (Prohibition) Act, 1986 : 22 cases.

If we look at state-wise distribution of total cases concerning crimes against women reported under SLL in 2018, it may be noticed that Uttar Pradesh tops the list (9,807 cases) and is followed by Maharashtra (6,430 cases), Bihar (4,228 cases) and Karnataka (3,782 cases). As in the case of crimes against women under IPC, Delhi (1,772 cases) was at top among union territories. Uttar Pradesh is on top so far as Dowry Prohibition Act, 1961; Tamil Nadu in Immoral Traffic (Prevention) Act, 1956; Madhya Pradesh in Protection of Women from Domestic Violence Act, 2005; Assam in Cyber Crimes/Information Technology Act (Women Centric Crimes only), Maharashtra in Protection of Children from Sexual Violence Act (Girl Child Victims only) and Rajasthan in Indecent Representation of Women (Prohibition) Act, 1986.

Some of the above statistics clearly confirm the fact that despite development in every field, women are not safe in Indian society. These figures are those which are in the police records. In fact, there are many more cases, which are not recorded due to fear or insult to the family. It is in this context that it is said that the protective provisions and measures made for women are safe in sacred documents and they have failed to actually provide protection to women. What could be the reason for this? If we analyze the crimes and various kinds of atrocities on women, then it becomes clear that the male-dominated mind-set is still the biggest obstacle in giving women equal rights as men and giving them equal status. This is the

kind of mentality that makes even educated girls tolerate domestic violence. It has been clear from many international and indigenous surveys that educated girls also believe that their husbands have the right to beat them. If women are not safe inside the house, outside the home and at the workplace, then measures taken under such constitutional and criminal laws cannot be said to be sufficient.

The need is that women should be aware of their rights, they should be able to raise their voice against all kinds of atrocities and in case of any kind of atrocities or crimes, and they can get justice by the courts in a very short time. It is true that thousands of years of male-dominated mind-set considers women as weak, considers them as objects of enjoyment, they are not afraid of violating laws and even if they are caught then due to lack of evidence they escape punishment. The provisions of the laws related to rape have been made very stringent, but these incidents of rape have not been reduced. This male dominated mind-set is not going to change easily. Women themselves and the government will have to work together in this direction. Women need to begin promoting gender equality through the process of socialization in the family. Gender sensitization at childhood could be very useful in achieving the goal of gender equality. Men also have to understand that times have changed and women too have the right to live on their own. Priyanka Kapoor<sup>6</sup> has rightly stated that the patriarchal values are deep-rooted in society and they are not likely to crumble within few decades. No doubt, these values are losing their importance slowly but steadily in Indian Society. This gender equality will definitely help in containing crime against them. We are likely to have much more gender equality and change in patriarchal mind-set in 21<sup>st</sup> century. Online abuse, which has the power to belittle, demean, intimidate and eventually silence women, has also to be checked to make women more safe and secure. Let us hope that India will be able to create an environment in which women will be safe in times to come.

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