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Sexual Harassment at Workplace in India and Need for Speedy Redressal of Complaints

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ABSTRACT

The achievement of the objectives of equality, development and peace is hindered by the inhuman act of violence against women. The physical, sexual and mental torture against women detaches them from exercising their full potential. The concept of sexual harassment is an area of great concern. The act of sexual harassment abridges and violates the fundamental rights of a woman guaranteed under Article 14, 15 and 21 of Part III of the Constitution of India. The Convention of the Elimination of All Forms of Discrimination Against Women (CEDAW) to which India is a signatory since 1993, mandates the State Parties under Article 11 of the Convention to take necessary steps in eliminating discrimination against women in employment. India's obligation towards International Organisations like CEDAW, ICESCE, ILO & Beijing Declaration and Platform for Action. The current paper highlights the incidents of sexual harassment from Bhanwari Devi's case in 1992 which made the Hon'ble Supreme Court to lay down the guidelines in 1997 in Vishakha v. State of Rajasthan. The Court also made sure that these guidelines should be implemented both in letter and in spirit. The paper has highlight the data of sexual harassment of the past few years released by various sources like National Commission for Women (NCW) and National Crime Records Bureau (NCRB). The paper has also listed provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2012 which was passed in 2013. Another important part mentioned is the recommendations made by the Justice J.S. Verma Committee report which pointed out the deficiencies in the Bill and improper implantation of Vishakha's case guidelines.

Keywords: *Sexual Harassment, workplace, violence, gender equality, women, discrimination, Vishakha.*

I. INTRODUCTION

Those days are gone when men used to be considered as the sole bread-winners of a family. With the advent of globalization, the status of women has changed in the society. However,

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with the arrival of women in the workplace, the cases of sexual harassment and unfair treatment have taken a climb. This unfair treatment against women affects their social and economic growth and puts them on back foot which affects their purpose and ability to deliver in today's competing world. This violence against women happens in many forms like targeting women because of their gender, their indecent representation. It is a social evil which is still raging in the society. More often, the victim of a sexual offence, in our society, is treated worse than the person who actually commits that offence. However, the victim who is subjected to forcible sexual abuse and is innocent has to face the aftermath and is made to feel that she is at fault. Sometimes the cases of such offences do not even get reported because of the societal fear, losing one's livelihood, losing the job and many more.

The concept of gender equality is laid down in the Constitution of India. Sexual harassment at workplace is a form of gender discrimination which contravenes with the fundamental right to equality, right to freedom and right to life of a woman which is guaranteed under Articles 14, 15, 19 and 21 of the Constitution of India. The Preamble of the Constitution guarantees equality of status and opportunity, and assures the dignity of the individual and the unity and the integrity of the Nation. The meaning of Democracy would be of no use if it fails to generate among all sections of the people, the spirit of brotherhood that they belong to the same soil especially in the country like India where people belonging to different races, religions, languages and of culture live together.²

Indian society is a 'sovereign, socialist, secular and republic'. The words 'socialist', 'secular' and 'republic' is of wide amplitude and great meaning. A combined reading of Article 42 of the Constitution of India and Preamble states that State has to take utmost care and be compassionate towards underprivileged or those disadvantaged. State is under a duty to make special provisions so that constitutional guarantees are enforced. Article 38 of the Constitution states that State shall endeavour to promote, secure and protect the welfare of the people

II. BACKGROUND

In September 1992, Bhanwari Devi, a social worker in Rajasthan was assaulted and gang-raped by some members of the Gujjar community. However, the accused were acquitted by a lower court and the appeal is pending in the Rajasthan High Court. The result was that number of Public Interest Litigations (PIL) was filed in the Supreme Court demanding, "safe workplaces for women and that it shall be the responsibility of the employer to protect

² Basu – Introduction to the Constitution of India, p. 23 (3rd ed. 1954).

women employee.”

In 1997, a writ petition³ was filed before the Supreme Court by an NGO led by a women rights group called Vishakha. The objective of which was to bring Supreme Court’s attention to an incident in Rajasthan where a social worker was gang-raped by members of the community. The petitioner in this case sought the enforcement of the fundamental rights of working women Articles 14, 19 and 21.

Since there was no law in India which deals specifically with the prevention of sexual harassment at the workplace. The Supreme Court on August 13, 1997, laid down the ‘Guidelines and Norms’ for the protection of women at workplace.

- It stated that, it shall be the duty of the employer in workplaces to prevent the acts of sexual harassment and to take all steps required for the settlement or prosecution of acts of sexual harassment.
- The employer shall in accordance with the law, take appropriate action by making a complaint with the appropriate authority.
- An appropriate complaint mechanism should be set up in employer’s organisation which shall look after the complaints where a conduct amounts to an offence under law or a breach of service rules.
- It shall be the duty of the employer to spread awareness about the rights of female employees in a suitable manner.
- Where an act by any outsider amounts to sexual harassment, the employer and the person in charge shall take all necessary steps to assist the victim in terms of support and preventive action.

The Supreme Court in its judgement highlights the importance of gender equality and the right to a secure workplace, as it forms a part of the fundamental right guaranteed under the Constitution of India. The Judiciary is duty bound to ensure that the state enforced these rights in view of nation’s obligation to adhere with covenants of international treaties and conventions.

Later the National Commission for Women (NCW) formulated a comprehensive legislation which dealt with prevention of sexual harassment at workplace. The Bill was revised and a final draft of ‘Prohibition of Sexual Harassment of Women at Workplace Bill, 2010’ was sent to the Ministry of Women and Child Development. The Bill was tabled on December 07,

³ Vishakha v. State of Rajasthan, AIR 1997 SC 3011.

2010 in the Lok Sabha and it was passed on September 03, 2012. The Bill was then passed by the Rajya Sabha on February 27, 2013.

III. ABOUT THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2012

Section 2 sub-section (n) of the Act defines 'sexual harassment' as any unwelcome acts or by omission whether it is direct or implied which is by either physical contact or verbal or non-verbal conduct of sexual nature, request for any sexual favour, showing pornography or making sexual remarks. The Act calls this as a sexual act which is unwelcome which results in the violation of fundamental right of women of safe working environment which affects her economical and social growth.

Sub-section (o) of Section 2 of the Act calls all those places a workplace which is frequented by the employee during the course of employment including the transportation provided by the employer. This sub-section takes within its ambit both the organised and the unorganised sector.

Section 3 of the Act says that no women shall be subjected to sexual harassment at any workplace. The Act under sub-section (2) of section 3 lists certain circumstances where any act of sexual nature during the course of her employment may amount to sexual harassment like any promise of preferential treatment, any threat of malign treatment, any kind of threat in context to her present or future employment status or act which creates an impediment in her work or creates an insecure work environment for her.

Section 4 of the Act talks about the constitution of an Internal Complaints Committee (ICC), where it is the duty of the employer a workplace to setup a committee by an order in writing. The Committee shall consist of a Chairperson who will be senior level working women, minimum 2 members amongst the employee having background in legal field and member from NGO.

Section 6 imposes a duty on the District Officer to setup a Local Complaints Committee (LCC) in their concerned district and their jurisdiction is limited to the area where it is constituted, which shall receive complaints of sexual harassment from organisations where there is no ICC. The Officer shall appoint one nodal officer in every tehsil (in rural area) and ward (in urban area) which shall forward the complaints of sexual harassment in 7 days to the Local Complaints Committee concerned.

IV. CASES OF SEXUAL HARASSMENT INCLUDING WORKPLACE

According to the data released by the National Commission for Women (NCW)⁴, there is a constant increase in the cases of sexual harassment which includes sexual harassment at workplace. The data collected is given below:

Year	2016	2017	2018	2019 (January)
No. of cases	539	570	965	29

According to the cases registered by the National Crime Records Bureau (NCRB)⁵ under section 509 of Indian Penal Code (IPC) which talks about insult to the modesty of a woman at office premises. The data were:

Year	2014	2015	2016
No. of cases	57	119	142

Data of 2014 as recorded by the National Crime Records Bureau (NCRB)⁶ shows a total of 21,938 cases registered under Section 354A across the country. Uttar Pradesh, Maharashtra and Madhya Pradesh recording the greatest number of cases. The data of the three states are given below:

States	Uttar Pradesh	Maharashtra	Madhya Pradesh
Total Cases Registered in 2014	4,435	4,052	3,163

State and city wise distribution of cases of sexual harassment in 2017 as recorded by NCRB shows as follows⁷:

States	Uttar Pradesh	Maharashtra	Madhya Pradesh
Total Cases Registered in 2017	5,830	2,985	2,910

⁴ Ministry of Women and Child Development, Government of India, *Press Information Bureau*, available at <https://pib.gov.in/Pressreleaseshare.aspx?PRID=1563588>, last seen at 21/12/2020.

⁵ Ibid.

⁶ National Crime Records Bureau (NCRB), *Crime in India – 2014*, available at https://ncrb.gov.in/sites/default/files/crime_in_india_table_additional_table_chapter_reports/Chapter%205_2014.pdf, last seen on 21/12/2020.

⁷ *Sexual Harassment in India: A Crisis*, Health Issues in India, available at <https://www.healthissuesindia.com/2019/10/30/sexual-harassment-in-india-a-crisis/>, last seen on 21/12/2020.

City/UT	Delhi	Mumbai	Kanpur
Total Cases Registered in 2017	613	391	162

V. PREVENTION IS BETTER THAN CURE: GENDER EQUALITY & VIOLENCE AGAINST WOMEN

Equality or Gender Equality forms the bedrock for a peaceful world. Gender Equality where on one hand refers to treating women and men equally in laws and policies. Violence against women defeats the very purpose of gender equality; it affects the women physically and psychologically including threats and arbitrary deprivation of personal liberty which may even result in long term effect in mind. Therefore, it becomes necessary to promote and spread awareness about gender equality to end violence against women. Violence negatively affects the women which may fracture her working process, while gender equality positively affects her which may improve her efficiency at work. So it is high time for the present generation to prevent it than finding a cure for it in future. To do so, it requires political commitment, bringing laws that promote gender equality and giving women new responsibilities at workplace.

More often the procedure to be followed while dealing with the cases of sexual harassment gets very complex. It then becomes necessary that the Complaints Committee must possess critical skills to effectively handle the issues of sexual harassment at workplace. Therefore, while dealing with the issues of sexual harassment it is necessary for members of the Complaints Committee to adhere with the provisions of the Act, guidelines laid down in *Vishakha's* case and other relevant laws dealing with the issue. The employers or the person in charge must be able communicate effectively and remain impartial in his conduct. The Committee is required to be trained both in skills and capacity to carry out fair enquiry.

VI. TACKLING THE CRISIS

#MeToo Movement

In October 2017, the victims of this violence around the globe were taken on social media platforms to share their experience with the hashtag #MeToo. The movement had less impact because only women who were speaking English and had success to social media were able to share their experience of sexual abuse. The result was such that women had to face backlash and they preferred not to speak about it.

The result of the #MeToo movement was such that stories filled with guilt and anger which was suppressed under the silence, erupted out in public media in the light of this movement. The movement created awareness about sexual assault and sexual violence. It also enabled the women to publicize the names of the accused. The movement compelled the employer or the person in charge of a workplace to take the issue seriously and redress them at the earliest. The setback of the movement was that it did not made the women working in homes and in unorganised sector to come out and raise their voice.

Sexual Harassment Electronic Box (SHe-Box)

The Ministry of Women and Child Development in 2017 launched Sexual Harassment electronic – Box (She-Box), an online complaint management system which was responsible for registering complaints related to sexual harassment at workplace by women which included both the government and private sector. A total of 513 complaints were recorded on the portal which included both the public and the private sector. Out of 513 complaints, 213 cases were disposed off in two years by the Central and State Government and Private Sector. States which had the most number of complaints were: Andhra Pradesh (18), Arunachal Pradesh (2), Assam (3), Bihar (20), Chandigarh (2), Chhattisgarh (7), Delhi (50), Gujarat (21), Haryana (29), Himachal Pradesh (3), Jammu and Kashmir (5), Jharkhand (2), Karnataka (34), Kerala (11), Madhya Pradesh (30), Maharashtra (82), Meghalaya (1), Odisha (5), Puducherry (3), Punjab (9), Rajasthan (23), Tamil Nadu (48), Telangana (20), Tripura (1), Uttar Pradesh (65), Uttarakhand (6) and West Bengal (13).⁸

VII. INTERNATIONAL OBLIGATIONS

1. Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)

India ratified CEDAW on July 09, 1993 and is a party to it. Article 1 of the Convention calls discrimination against women as a restriction or exclusion made on the basis of gender which puts the women on back foot. Article 11 of the Convention says that it is the obligation of the State parties to all appropriate steps in eliminating discrimination against women in employment.

2. International Covenant on Economic, Social and Cultural Rights (ICESCR)

India ratified ICESCR in April 1979. Article 7 under Part III of the Covenant says that every human being has the right to just and favourable working condition which includes both

⁸ Ministry of Women and Child Development, Government of India, *Press Information Bureau*, available at <https://pib.gov.in/Pressreleaseshare.aspx?PRID=1594218>, last seen on 21/12/2020.

healthy and safe working environment. The State parties is under an obligation to provide these rights to the individuals equally which is the base of freedom, justice and peace.

3. International Labour Organisation (ILO)

The International Labour Organisation on June 10, 2019 adopted the Violence and Harassment Convention, 2019 (No.190)⁹. The Preamble of the Convention recognises the right to work in an environment free from violence and harassment. The violence and harassment including gender based violence and harassment results in human rights violation and is a threat to the concept of gender equality. Article 8 of the Convention says that each member party shall take appropriate steps to prevent the act of gender based violence and protect the individuals. The representative of Indian government had voted in the favour of the Convention.

4. Beijing Declaration and Platform for Action

It states that violence against women both abridges and paralyses the enjoyment of fundamental freedoms and human rights. Empowerment of women and their full participation in all spheres is of paramount importance. It directed the State parties to take all necessary steps to eliminate all forms of discrimination against women. The State parties shall strive to prevent and eliminate all forms of violence against women and girls, and promote and protect all human rights of women and girls.

VIII. SEXUAL HARASSMENT UNDER INDIAN LEGISLATION

Indian Penal Code (IPC)

Section 354 – A person is said to have committed an offence under Section 354 of IPC if he assaults or uses any sort of criminal force with the intention of outraging the modesty of a woman. It is a cognizable or non – bailable offence and the punishment provided under this section is imprisonment for 1 year which may range upto 5 years, and with fine.

Section 354A – It provides for a demand or request for favours of sexual nature, showing obscene content against the will of a woman or any unwelcome physical contact. The section provides for imprisonment for a term which may extend to 3 years or fine or both.

Section 503 – If a person threatens another to do an act which he is not legally obliged to do or omits to do which he is legally obliged to do is said to have committed criminal intimidation. It is a non-cognizable offence and the punishment imposed is 2 years of

⁹ International Labour Organisation, *Convention on Violence and Harassment, 2019, No.190*, available at https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190, last seen on 21/12/2020.

imprisonment, or fine, or both.

Section 509 – A person is said to have committed an offence under Section 509 of IPC if he with intent to insult the modesty of a woman makes any gesture, utters any word or acts and that gesture, word or act intrudes with her privacy. The punishment under this offence is imprisonment for a term which may extend to 3 years and also with fine.

IX. SOME JUDGEMENTS – AFTER VISHAKHA

1. Apparel Export Promotion Council v. A.K. Chopra¹⁰

This was the first case that came before the Supreme Court after *Vishakha's* judgement. In this case, a senior officer of the council was found guilty of harassing a female employee working as a Clerk-cum-Typist sexually at the workplace.

The Director General dismissed the service of the respondent. The respondent challenged his dismissal in the High Court. The Single Judge of the High Court rejected his dismissal and allowed the respondent to go to any other office outside, for a period not less than 2 years.

Challenging the judgment of the Division Bench of the High Court, the appellant filed a Special Leave Petition in the Supreme Court. The Supreme Court upheld the conviction of the respondent and widened the definition of sexual harassment. It held that physical contact is not necessary for it to amount to an act of sexual harassment. It went on explaining that, it is a form of discrimination based on sex, projected through an 'unwelcome' sexual advances, request for favours of sexual nature and other direct or implied physical or verbal conduct with sexual suspicion which has the tendency to affect the employment of female employees and interfere unreasonably with performance in her work and create a hostile working environment for her.

2. Medha Kotwal Lele & Ors. v. Union of India & Ors.¹¹

A Public Interest Litigation (PIL) was filed by the appellant highlighting the instances that women continue to be victims of sexual harassment at workplaces even after 15 years of the guidelines laid down by the Supreme Court in *Vishakha's* case. The guideline mandates the employers at workplaces to prevent the cases of sexual harassment. The Supreme Court stated that the States and employers lacked in effectively implementing *Vishakha's* guidelines both in letter and in spirit in public as well as in private sector which has defeated the purpose of the guidelines. The Court noted that the guidelines issued in *Vishakha's* case were not

¹⁰ AIR 1999 SC 625.

¹¹ AIR 2013 SC 93.

properly implemented by the various States/Institutions/Departments. The effective implementation of these guidelines is needed so as to make environment of workplace safe and secure and thereby allowing the women to work with full dignity, decency and due respect.

3. Amendments in Indian Penal Code Post Nirbhaya Incident

The 2012 Nirbhaya case created a huge agitation and unrest in the minds of the people across the country. The United Nations Entity for Gender Equality and the Empowerment of Women condemned the incident and told the Government of India to take every possible step to make radical reforms and make the life of a woman safe and secure.

The Lok Sabha on March 19, 2013 passed the Criminal Law (Amendment) Ordinance, 2013 and on March 21, 2013 it was passed by the Rajya Sabha. The Ordinance was originally promulgated by the then President of India, Pranab Mukherjee on February 03, 2013. The Bill on April 02, 2013 received the assent of the President.

The Criminal Law (Amendment) Act, 2013 provided for amendment in Indian Penal Code (IPC), the Indian Evidence Act and the Code of Criminal Procedure (CrPC) on laws pertaining to sexual offences. The agitated public demanded for a change or amendment in the existing laws dealing with sexual offences, with more grave punishment for the accused.

- IPC Section 354A – Sexual Harassment. Punishment 1 year of imprisonment or, with fine or with both.
- IPC Section 354B – Assault or use of Criminal force with the intent to disrobe her. Punishment 3 years of Imprisonment which may extend upto 7 years and with fine.
- IPC Section 354C – Voyeurism. During 1st conviction, 1 year of imprisonment which may extend upto 3 years and with fine. During 2nd conviction, 3 years of imprisonment which may extend upto 7 years and with fine.
- IPC Section 354D – Stalking. During 1st conviction, imprisonment upto 3 years and with fine. During 2nd conviction, imprisonment upto 5 years and with fine.

X. “UNHEARD VOICE, SUFFERING IN SILENCE”

Majority of the female population in the country are engaged in the informal sector like working in domestic work, working in construction site, engaged in home-based work, agriculture work, street vendors, the figure is somewhere around 95% of the population. The Act of 2013 takes these women within its ambit but the biggest setback is the ineffective implementation of the provisions of the Act. The women in informal sector struggle to raise

their voice against the evil act. The perpetrator of the act suppresses the voice of the women. To set her free from the daily torture, some women are forced to leave the work and are forced to struggle for their daily bread. The result is such that once a women leave one job, she find it really difficult to step in the other because of the fear of same torture.

The domestic workers in India specifically the women domestic workers are highly exposed to such crime and due to the lack of protection under the relevant laws, stories of sexual harassment regularly flash on media channels. The exact figure of domestic workers in India is not yet out. There have been differences in the numbers cited by the government and the other sources.

The Local Complaints Committee under the Sexual Harassment of Women at (Prevention, Prohibition and Redressal) Act of 2013 is under an obligation to forward the complaints of sexual harassment of domestic workers to the police. But these women find it really difficult to seek redressal through the police due to lack of trust, lack of assistance on the part of the police while sometimes the cases are not even reported. One major reason of non-reporting of cases is that the investigation may take even a year to reach its final stage and during that time victim has to face the humiliation.

XI. NEED FOR PROPER IMPLEMENTATION OF PROVISIONS OF THE ACT

As pointed out by the Hon'ble Supreme Court in *Medha Kotwal Lele's* case the improper implementation of the guidelines laid down in *Vishakha's* case. The Government has failed to establish the Local Complaints Committee which is the main feature of the Act of 2013. According to a study conducted by Martha Farrell Foundation and Society for Participatory Research in Asia in the year 2018, based on Right to Information requests to 655 districts in the country. It was concluded that out of the 655 districts only 29% mentioned in their reply that they have formed Local Complaints Committee, 15% did not form any Local Complaints Committee while 59% of the districts didn't respond¹². Even if there is a committee available at the workplace, it is difficult to find the information about it on websites or in public. The study also highlighted the lack of awareness among the committee members regarding their roles which indicated the lack on their part to handle the complaints of sexual harassment.

It's been 7 years of the Act and there is very less awareness about the Local Complaints Committee reason being lack of financial support from the central government to the various state governments.

¹² Maratha Farrell Foundation & Society for Participatory Research in Asia, '*Who safeguards a Woman's Right to a Safe Workplace?*', available at http://www.marthafarrellfoundation.org/uploads/pdf_files/1555302838_RTI%20Study%20PDF.pdf, last seen on 22/12/2020.

XII. JUSTICE J.S. VERMA COMMITTEE

A 3 member Committee was formed which was headed by Chief Justice (Retd.) J.S. Verma on January 23, 2013 which consisted of Justice (Retd.) Leila Seth and Senior Advocate Gopal Subramanian. The Committee was formed to review and submit its report after examining amendments made in the criminal law to provide speedy trial and higher punishment in cases of sexual harassment against women.

The Committee reviewed the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Bill, 2012. The Committee in its conclusion stated that the Bill does not reflect the spirit of Supreme Court's guidelines laid down in *Vishakha's* case and it is unsatisfactory as a whole. The Bill was passed without taking into account the *Vishakha's* guidelines.

The Committee was disturbed with the structure of the Internal Complaints Committee, as the dealing of grievances within the four walls of the workplace would prevent the women from filing any complaints, this process may even involve the suppression of sensitive cases. The Committee in its report also made some recommendation to the weaknesses.

Recommendations made by the Committee

- The Committee in its report recommended for the removal of Section 10 sub-section (1) which provided for conciliation between the complainant and the respondent. The Committee said that it is in conflict with the *Vishakha's* guidelines. Attempt of conciliation can only be made in the matters of matrimonial disputes and not in matters of sexual harassment.

- It also recommended for the removal of Section 14 which tend to punish a woman for filing a false complaint. The Committee said that this provision is abusive and it violates the objective of the law.

- It also recommended for the removal of Section 11 (ii) which gave power of the Civil Courts to summon, discovery and production of the documents to the Internal Complaints Committee. It said that if the committee does not have any legal background, the power of courts cannot be granted on them. Additionally, the Bill does not mention about training to committee for performing these duties.

- The Committee also recommended for the formation of Employment Tribunal and its jurisdiction. It said that Employment Tribunal shall consist of 2 retired judges out of them

one must be woman, 2 eminent sociologists and one social activist having sufficient background in the field of gender-based discrimination.

- The members of the Tribunal should be appointed by a collegiums consisting of Chief Justice of the High Court of the concerned State, 1 female sociologist, 1 female advocate. There shall be no application of complex procedure, no civil trial of complaint which affect woman in the workplace. The Tribunal shall be free to choose its own procedure.

- Publication of Sexual Harassment policy within the premises of the workplace with complete procedure of filing a complaint. The policy should be such that a person joining the workplace must be aware of his/her rights against sexual harassment.

- The requirements of complaints to be limited to writing. However, the complainants may be free to approach the Tribunal directly to state a complaint orally. It is due to more often the underprivileged female workers are not in a position to make a written complaint because of their illiteracy.

- Limitation period of 3 months for making a complaint under Section 9 (1) should be removed and woman should be allowed to approach the Tribunal anytime but it should be within a reasonable period which shall be determined by the Tribunal.

Justice J.S. Verma was constituted to look into the deficiencies of the Bill and recommend for rectification of errors. The Committee took in view the *Vishakha's* guidelines while framing the recommendations. The report of the Justice J.S. Verma Committee was a landmark statement which was applauded by all citizens of the country. The report of the Committee reflected the idea of gender equality enshrined in the Constitution of India.

XIII. CONCLUSION

This social evil in our society which treats women inferior to men still persists and the time has come for the people to realise that women also need their personal liberty to be fully exercised and feel liberated and emancipated and put an end on imposing fundamentally oppressive conditions which may result in freedom of choice can be fully exercised. Women should be guaranteed their private space to choose her private and religious beliefs. Women and girls represent half of the population of the world, therefore besides being a fundamental human right, it is very important for its existence in a peaceful society. Unfortunately, to achieve full gender equality we still have to cover a long way and to do so we have to put and on gender violence, gender discrimination, to ensure equal participation of class of the

society and access to education, access to employment, equal participation in decision-making process.

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