

## Role of Police towards Sexual Offenses against Women: A Critical Study

**Ram Pal Bidhuri<sup>1</sup>**

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### Abstract:

*The existing legal framework is striving hard to combat all kind of crime against women and especially sexual offences; it is seen and observed that instead of controlling such crimes, these crimes are gradually increasing. The rape victims are facing hard time since no adequate course constructed for them in order to obtain speedy trial and justice.*

*The terms sexual harassment has been defined as – an unwelcome sexually determined behavior (whether directly or by implication) as: Physical contact and advances; A demand or request for sexual favours; Sexually coloured remarks; Showing pornography; and Any other unwelcome physical, verbal or non-verbal conduct of sexual nature*

**Keywords:** *Sexual Offenses against Women, Physical contact and advances; A demand or request for sexual favours; Sexually coloured remarks; Showing pornography; and Any other unwelcome physical, verbal or non-verbal conduct of sexual nature*

### Authors:

1. Research Scholar, Amity University, Noida (U.P), INDIA

This offence of sexual harassment has not been dealt anywhere specifically under the Indian Penal Code. However, following the definition stated above, we find that the offence which falls within the bracket of this definition has been dealt under section 294, section 354 and section 509 of the IPC. Section 294 deals with obscene acts and songs. Section 354 deals with the case of assault or criminal force to women with intent to outrage her modesty. Section 509 talks about words, gestures or act intended to insult the modesty of a woman.<sup>1</sup>

The violation of women's fundamental rights through physical, mental, emotional, and sexual violence against women has become almost commonplace in the Indian context. Violence against women has taken particularly acute forms in circumstances where populations are already marginalized, such as in areas affected by armed conflict, areas undergoing mass displacement. Women in the Tribal belts and amongst Dalit populations are already vulnerable, and become even more so in areas affected by conflict. There is therefore a pressing need for the judiciary to recognize and address the particular forms of violence levied against women who are 'doubly marginalised' by caste, class, religion, or in situations conflict. Customary routinely laws discriminate against women, both by denying justice to victims of violence and by dispossessing women from their shares in land and property. A number of laws that protect women from

discrimination have also either inadequate, or have not been properly implemented.<sup>2</sup>

Sexual violence apart from being a dehumanizing act is also an unlawful intrusion of the right to privacy and sanctity of a female. It is a serious blow to her supreme honour and offends her self-esteem and dignity. It degrades and humiliates the victim and leaves behind a traumatic experience. It has been rightly said that whereas a murderer destroys the physical frame of a victim, a rapist degrades and defiles the soul of a helpless female. The courts are, therefore, expected to try and decide cases of sexual crime against women with utmost sensitivity. Such cases need to be dealt with sternly and severely. A socially sensitized Judge is a better armour in cases of crime against women than long clauses of penal provisions, containing complex exceptions and complicated provisos.<sup>3</sup>

Once a person is convicted for an offence of rape, he should be treated with a heavy hand. An undeserved indulgence or liberal attitude in not awarding adequate sentence in such cases would amount to allowing or even to encouraging 'potential criminals'. The society can no longer endure under such serious threats. Courts must hear the loud cry for justice by society in cases of heinous crime of rape and impose adequate sentence. Public abhorrence of the crime needs

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<sup>1</sup> Critical Analysis of Sexual Harassment under IPC, available at: <http://www.legalindia.com/critical-analysis-sexual-harassment-ipc/> (Last visited on May, 12, 2016)

<sup>2</sup> Women's Justice, available at: <http://www.hrln.org/hrln/womens-justice-.html#> (Last visited on March 10, 2016)

<sup>3</sup> State of Madhya Pradesh Vs. Babulal (MANU/SC/0001/2008)

reflection through imposition of appropriate sentence by the Court.<sup>4</sup>

It is often stated that a woman who is raped undergoes two crises-the rape and the subsequent trial. While the first seriously wounds her dignity, curbs her individual, destroys her sense of security and may often ruin her physically, the second is no less potent of mischief, inasmuch as it not only forces her to relive through the traumatic experience, but also does so in the glare of publicity in a totally alien atmosphere, with the whole apparatus and paraphernalia of the criminal justice system focused upon her.

In particular, it is now well established that sexual activities with young girls of immature age have a traumatic effect which often persists through life, leading subsequently to disorders, unless there are counter-balancing factors in family life and in social attitudes which could act as a cushion against such traumatic effects.

Rape is the 'ultimate violation of the self'. It is a humiliating event in a woman's life which reads to fear for existence and a sense of powerlessness. The victim needs empathy and safety and a sense of reassurance. In the absence of public sensitivity to these needs, the experience of figuring in a report of the offence may itself become another assault.

Forcible rape is unique among crimes, in the manner in which its victims are dealt with by the criminal justice system. Raped women have to undergo certain tribulations. These begin with their treatment by the police and continue through a

male-dominated criminal justice system. Acquittal of many de facto guilty rapists adds to the sense of injustice. In effect, the focus of the law upon corroboration, consent and character of the prosecutrix and a standard of proof of guilt going beyond reasonable doubt have resulted in an increasing alienation of the general public from the legal system, who find the law and legal language difficult to understand and who think that the courts are not run so well as one would expect.<sup>5</sup>

There are various ways and forms in which sexual exploitation is practiced. The most perverted and degrading form is rape. The term "rape" is derived from the Latin Word "rapere" meaning to steal, seize or carry away; it implies hiding and attacking woman by man for the satisfaction of his sexual desire. It is the ultimate violation of self. Incidences of rape, particularly among young and adolescent girls are reported almost daily. It has become part of almost every TV serial, where various methods of procuring the women are reported. Rape shakes the very foundations of victim's life. It not only humiliates and makes a woman powerless, but for many, the effects are long lasting. The capacity for personal relationship gets impaired and endless fear is generated. Various women's organizations are working throughout the world to protect the women against atrocities but in spite of these efforts, the atrocities are increasing day by day. Sexual crimes against women in India are very common. Though most of these remain undetected and unreported, the actual incidence is on the rise. The crimes, which are reported, represent only the part of the tip of

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<sup>4</sup> Dinesh Vs. State of Rajasthan [2006CriLJ1679 ]( MANU/SC/8078/2006)

<sup>5</sup> Law commission of India eighty - fourth report on rape and allied offences: some questions of substantive law, procedure and evidence

iceberg. The reasons cited for low reporting in India are many like - due to family pressure (especially when the head of the family or a close relative is involved); social pressure (especially when an important member of the society is involved); personal reasons due to lack of awareness or being not able to report due to psychosis or due to fear of being further ridiculed and unaccepted; cultural factors (when incestuous relations or premarital sex is culturally accepted); legal reasons (due to lack of faith in law-enforcing agencies or due to fear of being exploited) or judicial factors (when the enforcement law is lax and judicial decision takes a very long time or due to fear of being further tortured by repeated and prolonged interrogation especially in rape victims resulting in reliving of rape-trauma syndrome); when crimes are being done in institutions (i.e. Mental Hospitals, Home for Socially Destitute Women, Police Stations or Prisons); and also due to non-availability of documentation centres.<sup>6</sup>

In instances where women have reported such illegal and unwelcome behavior, there have been significant victories in the past decade or so. Also considering the fact the sometimes these victories are achieved after a wait of a decade or so.

In **N Radhabai Vs. D. Ramchandran**, when **Radhabai**<sup>7</sup>, Secretary to D Ramchandran, the then social minister for state protested against his abuse of girls in the welfare institutions, he attempted to

molest her, which was followed by her dismissal. The Supreme Court in 1995 passed the judgment in her favour, with back pay and perks from the date of dismissal.

Vishaka's case: It was in 1997 in **Vishaka Vs. State of Rajasthan**<sup>8</sup> and others, that for the first time sexual harassment had been explicitly- legally defined as an unwelcome sexual gesture or behaviour whether directly or indirectly as

1. Sexually coloured remarks
2. Physical contact and advances
3. Showing pornography
4. A demand or request for sexual favours
5. Any other unwelcome physical, verbal/non-verbal conduct being sexual in nature.

It was in this landmark case that the sexual harassment was identified as a separate illegal behaviour. The critical factor in sexual harassment is the unwelcome ness of the behaviour. Thereby making the impact of such actions on the recipient more relevant rather than intent of the perpetrator- which is to be considered.

<sup>6</sup> Sexual crimes against women: scenario in Delhi, available at: [http://www.anilaggrawal.com/ij/vol\\_001\\_no\\_002/paper004.html#](http://www.anilaggrawal.com/ij/vol_001_no_002/paper004.html#) (Last visited on May, 21, 2016)

<sup>7</sup> Miss Radha Bai Vs The Union Territory Of Pondicherry Represented By Its Chief S( 1995 Air 1476, 1995 SCC (4) 141)

<sup>8</sup> Vishaka Vs. State of Rajasthan and others AIR, 1997 S.C 3011

In **Mohd.Habib Vs State**<sup>9</sup>, the Delhi High Court allowed a rapist to go scot-free merely because there were no marks of injury on his penis- which the High Court presumed was a indication of no resistance. The most important facts such as the age of the victim (being seven years) and that she had suffered a ruptured hymen and the bite marks on her body were not considered by the High Court. Even the eye- witnesses who witnessed this ghastly act, could not sway the High Court's judgment. Police investigation in this case had proved out to be in valuable and deficient.

In, **Seema Lepcha v. State of Sikkim**,<sup>10</sup> The petitioner, a peon at the Central Bank and a widow aged 37, sexually harassed by, then Chief Manager of Gangtok branch, who used to ask her unwelcoming questions and on 1st March 2008, brushed against her and touched her chest. An F.I.R was lodged with the police. After the police filed a closure report in the case. As per the Vishaka Guidelines of Sexual Harassment at Workplace there needs to be an independent committee at the workplace which was not there. The Investigation Officer (IO) in the case also filed a closure report. his order of High Court of Sikkim was challenged in the Supreme Court of India, where the State of Sikkim was directed to instruct the concerned officer to file a comprehensive list of all public and private establishments operating within the State and the needful be done within a period of four

weeks. The Chief Secretry, State of Sikkim was ask to file an affidavit and give details of the steps taken by the State Government for implementation of the guidelines framed by this Court in Vishakha and Medha Kotwal Lele.<sup>11</sup>

In, **Medha Kotwal Lele vs. Union of India**<sup>12</sup> : The petition seeks the implementation of the Vishaka Guidelines by the central and state Governments of India. The Vishaka Guidelines are guidelines against sexual harassment of women in private and public sector workplaces, issued by the Supreme Court of India in Vishaka & others vs. State of Rajasthan & others in 1997. However, there continue to be numerous instances of harassment in various private workplaces such as educational institutions, Bar Associations, Medical Councils and all other professional and technical associations, where compliance to the Guidelines do not exist. The present PIL aims to force the Government to enact comprehensive legislation, which will ensure a safe, harassment and violence free working environment for all women in India.<sup>13</sup>

Read more: <http://hrln.org/hrln/womens-justice-pils-a-cases/239-medha-kotwal-lele-vs-union-of-india-and-others.html#ixzz4nHWFxKq7>

Another classic example of the judicial pronouncements in rape cases is the case of **Bhanwari Devi**, wherein a judge remarked that the

<sup>9</sup> 1989 Cr.LJ 137 Delhi

<sup>10</sup> (2013) 11 SCC 641

<sup>11</sup> Seema Lepcha v. State of Sikkim, *available at*: <http://www.hrln.org/hrln/womens-justice-pils-a-cases/876-seema-lepcha-vs-state-of-sikkim-a-ors.html>(Last visited on July 12, 2017)

<sup>12</sup> 2012 STPL (Web) 616 SC

<sup>13</sup> Medha Kotwal Lele vs. Union of India, *available at*: <http://hrln.org/hrln/womens-justice-pils-a-cases/239-medha-kotwal-lele-vs-union-of-india-and-others.html> (Last visited on July 12, 2017)

victim could not have been raped since she was a dalit while the accused hailed from an upper caste-who would not stoop to sexual relations with a dalit. In another instance of conscience stirring cases, Sakina- a poor sixteen year old girl from Kerala, who was lured to Ernakulam with the promise of finding her a good job, where she was sold and forced into prostitution. There for eighteen long months she was held captive and raped by clients. Finally she was rescued by the police- acting on a complaint filed by her neighbour.<sup>14</sup>

People of high repute, including TERI's R. K. Pachauri, AAP MLA Somnath Bharti and Mahmood Farooqui of 'Peepli Live' fame faced charges of sexual assault and molestation in 2015 in Delhi courts, one of which awarded life imprisonment to the accused driver in the Uber rape case. However, one case which had a chilling effect on society was the December 5, 2014 Uber rape case in which a fast-track court despite facing legal hurdles created by the accused, concluded the entire criminal prosecution in 11 months, sending 33-year-old driver Shiv Kumar Yadav to jail for entire life.<sup>15</sup>

That after witnessing these incidents and increasing graphs on sexual offences, a commission of inquiry has been now been framed by the Delhi government to look into unheeded complaints pertaining to

women's safety since February 2013. Complaints regarding violence, sexual harassment, stalking and voyeurism against women will be taken up by a three-member committee headed by a retired district judge Dinesh Dayal. Dr Surbhi Singh and Richa Mishra Pandey, wife of Aam Admi Party member Dinesh Pandey, constitute the rest of the panel. The commission will have a two-year tenure and will have to submit report of its findings every three months from the date of first sitting, according to the notification that was issued on January 19. The terms of reference of the commission will be to receive unheeded complaints regarding crimes such as violence, sexual harassment, stalking, voyeurism etc that are committed to against women since February 2013, i.e. subsequent to amendments made to IPC (1860) and CrPC (1973) on the basis of some of the recommendations made by Justice Verma Committee and to suggest action to Government of National Capital Territory of Delhi, the notification reads. This committee will also be mandated to recommend measures to expedite proceedings in criminal cases, amendments to make currents laws more effective and recommend welfare measures for improving working condition of personnel in law enforcement agencies, among others.<sup>16</sup>

### **FUNCTIONING OF POLICE:**

against-women-in-delhi-in-2015/# (Last visited on May, 24, 2016)

<sup>16</sup> AAP govt constitutes panel to probe crimes against women in Delhi, *available at:* <http://www.hindustantimes.com/india/aap-govt-constitutes-panel-to-probe-crimes-against-women-since-2013/story-v4aLSB28ZjZxCjjeOIBBqN.html> (Last visited on May, 20, 2016)

<sup>14</sup> Sexual harassment and law on rape in India, *available at:* [http://www.legalserviceindia.com/articles/rape\\_laws.htm](http://www.legalserviceindia.com/articles/rape_laws.htm) (Last visited on March 12, 2016)

<sup>15</sup> This List Of Crimes Committed Against Women In Delhi In 2015 Is Frankly Just Frightening, *available at:* <http://www.youthkiawaaz.com/2015/12/crimes->



In 2015, as reported in a newspaper called “Hindustan Times” the role of the the police was not at all appreciated and entire depiction was in bad light. It was reported that even Standing Committee Parliamentary has criticized the steps taken by Delhi police and has expressed unpleasantness towards working of police, that the standing parliamentary committee clearly said that nothing effective is being done by Delhi Police in order to protect women moreover, committee elaborated action initiated by Delhi Police on improving the safety of women as “disheartening” furthermore directed the police work out asked the efficient and flexible stratagem to battle offense against women.

In the last few years, crime against women in Delhi has increased to a great extent. According to the statistics, it is found that every two out of three women have suffered around two to five times sexual harassment in the last year. According to the survey of women, it is found that women are losing their confidence in police. By the survey of Delhi government’s Women and Child Development Department, around 80% of the women in national capital have fear regarding their safety. Women are harassed not only in the night or evening but also in the day time at their home, working places, or other places like street, club, etc. It is found through the survey that the reason of sexual harassment is the lack of gender-friendly environment and improper functional infrastructure such as consumption of alcohol and drugs in open area, lack of adequate lighting, safe public toilets, sidewalks, lack of effective police service, lack of properly working

helpline numbers, etc. A huge percentage of women have no faith that police can curb such harassment cases. There is an urgent need to understand and solve this problem of women safety so that they can also grow equally like men in their own country.<sup>17</sup>

It is unbelievable to know that in many cases, police instead of saving women modesty, they themselves outrage the modesty of women. In recent case of Chhattisgarh state, police personnel themselves acted as criminals by raping innocents.

The Indian government’s human rights watchdog has accused police of raping and beating at least 16 women from tribal communities in Chhattisgarh, a central state racked by a 50-year Maoist insurgency. The National Human Rights Commission (NHRC) said there were 20 alleged attacks still to be investigated, but that in 16 cases the “human rights of the victims have been grossly violated by the security personnel”. “Around 40 women have said that they were forced to strip, sexually harassed and assaulted,” one WSS member said. They allegedly included a 14-year-old girl who was grazing cattle when she was said to have been raped by several officers. The NHRC said it believed eight women had been raped, six sexually abused and two physically assaulted by police men.<sup>18</sup>

The report of the 189th Standing Committee though noted several steps taken by Delhi Police but still pointed out the inability of Delhi police in protecting women against various heinous crimes which were on a regular basis and no further effective and impactful steps are being taken for spontaneous actions without

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<sup>17</sup> Safety of women in India, available at: <http://www.indiacelebrating.com/essay/safety-of-women-in-india-essay/> (Last visited on March 10, 2017)

<sup>18</sup> Indian police accused of raping women in restive Chhattisgarh state, available at: <https://www.theguardian.com/world/2017/jan/10/indian-police-accused-of-raping-women-in-restive-chhattisgarh-state> (Last visited on July 03, 2017)

any delay. It was suggested to improve the call centers, to take immediate actions on cases such as eve teasing, harassment in public places and other sexual assaults. Atlas 20 members should be deployed on all police stations to take note of such crimes was also suggested. The Delhi police have failed to build the trust and confidence in females residing in Delhi, that even non-Delhilites and foreigners visiting Delhi became afraid of Delhi Police. The terror of regulation amongst sexual offenders was then missing. The happening of offense against women have a intimidating tendency, be it occurrence of a murder case of women at an area called Anand Parvat or alleged molestation of citizens of America. The Committee, consequently, believes that there is a urgent requirement for programs that can teach and illustrate to tackle such sensitive issues concerning safety of women.<sup>19</sup>

Role of Police is pivotal in safety and security of citizens in general and women in particular. To increase the visibility of women in the police force, Home Ministry has carried forward the initiative to give 33% reservation to women in police force by implementing it in UTs and propagating in the States. There has been an increasing emphasis on gender sensitivity of police force through training programmes, performance appraisal, women police stations to tackle crime against women. A recent

advisory dated 12th May, 2015 by the Home Ministry stresses on the need for sensitivity in handling women's issues. However, it is a matter of common knowledge that women who are victims of violence or harassment may not find it easy to approach the police or other authorities for getting help or support. It would, therefore, be desirable to provide them an effective alternative for getting help and support. 1.5 In order to promote these objectives and increase focused community outreach, Government of India envisages engagement/ nomination of Mahila Police Volunteers (MPVs) in all States and UTs who will act as a link between police and community and facilitate women in distress. This will be done in a phased manner.<sup>20</sup>

That after seeing an increase in number of sexual offenses against women, Delhi High Court in Delhi Commission of Women vs. Delhi Police<sup>21</sup>, issued guideline as follows:

### **POLICE**

- a. Every Police Station shall have available round the clock a lady police official/ officer not below the rank of Head Constable.
- b. As soon as a complaint of the offence is received, the duty officer receiving the

<sup>19</sup> Delhi Police steps on women's safety 'disheartening': Panel, available at: <http://www.hindustantimes.com/delhi/delhi-police-steps-on-women-s-safety-disheartening-panel/story-jZSSgeDR6XODXxiI4J6K0H.html> (Last visited on March 19, 2017)

<sup>20</sup> Guidelines for operationalizing mahila police volunteers (mpvs) initiative, available at: <http://wcd.nic.in/sites/default/files/GUIDELINES%20FOR%20OPERATIONALIZING%20MPV%20uplo>

aded%20on%20the%20website.pdf (Last visited on April 08, 2017)

<sup>21</sup> W.P.(CRL) 696/2008, order dated 23.04.09, also available at: [http://www.ncw.nic.in/PDFFILES/Delhi\\_High\\_Court\\_judgement\\_on\\_guidelines\\_for\\_dealing\\_rape\\_cases\\_by\\_various\\_authorities.pdf](http://www.ncw.nic.in/PDFFILES/Delhi_High_Court_judgement_on_guidelines_for_dealing_rape_cases_by_various_authorities.pdf) (Last visited on March 19, 2017)



- complaint/ information shall call the lady police official/ officer present at the police station and make the victim and her family comfortable.
- c. The duty officer, immediately, upon receipt of the complaint/ information intimate to the “Rape Crises Cell” on its notified helpline number.
- d. After making preliminary inquiry/ investigation, the Investigation Officer along with the lady police official/ officer available, escort the victim for medical examination.
- e. The Assistant Commissioner of Police shall personally supervise all investigation into the office.
- f. The statement of victim shall be recorded in private, however, the presence of family members while recording statement may be permitted with a view to make the victim comfortable. In incest cases where there is a suspicion of complicity of the family members in the crime such family members should not be permitted.
- g. The Investigating Officer shall bring the cases related to “child in need of care and protection” and the child victim involving in incest cases to the Child Welfare Committee.
- h. The accused should not be brought in the presence of victim except for identification
- i. Except the offences which are reported during the night no victim of sexual offence shall be called or made to stay in the police station during night hours. The Social Welfare Department of the Government of NCT of Delhi shall ensure that Superintendents of the Foster Home for Women will provide necessary shelter till formal orders are secured from the concerned authorities.
- j. The Investigating Officer shall endeavor to complete the Investigation at the earliest and he shall ensure that in no case the accused gets the undue advantage of bail by default as per the provisions of Section 167 Cr.P.C. It is desirable that in cases of incest the report under Section 173 Cr PC is filed within 30 days.
- k. Periodically training to deal with rape cases should be provided to the police officers, juvenile police officers, Welfare Officers, Probationary Officers and Support persons. A Training Module be prepared in consultation with the Delhi judicial Academy.
- l. The Police should provide information to the Rape Crisis Cell regarding the case including the arrest and bail application of the accused, the date of filling of the investigation report before the Magistrate;
- m. The Police should keep the permanent address of the victim in their file in addition to the present address. They should advise the victim to inform them about the change of address in future.
- n. Subject to the outcome of the W.P.(C) 2596/2007 titled Rajeev Mohan Vs. State, pending before this Hon’ble Court in cases where the victim informs the police about any threats received by the accused family, the

concerned DCP should consider the matter and fresh FIR must be registered under Section 506 of the Indian Penal Code.

### **CONCLUSION:**

When we speak of Indian Criminal law, it should be a well known fact that only a few years ago, sexual harassment of women was not enlisted as a juridical category of crime. It was in the year 1997 that the realm of judicial interpretation widened and the object 'sexual harassment of working women' was configured in the light of the famous case of Vishakha and Another's v. Union of India. There is a wide debate in India on the issue that whether laws hold promise of justice for women who have been victims of violence. At the same time a need is felt to compliment this with critical evaluation of new modes of governance and surveillance. Some preventive steps to keep a check on the cases of sexual harassment are quite necessary. This goal can be achieved when sexual harassment is completely prohibited so that such incidents may be notified and circulated. Provisions for appropriate working conditions for women should also be made.<sup>22</sup>

In India, rape cases either don't get reported for various reasons or don't reach a conclusive state, with culprits roaming free eyeing their next target. Developing countries like India do not have a deterrent punishment

for such heinous crimes. Additional sessions judge Kamini Lau had on May 11, 2011 suggested "chemical castration" as an alternative to a jail term for rapists. Chemical castration is the administration of medication designed to reduce libido and sexual activity, usually in the hope of preventing rapists, child molesters and other sex offenders from repeating their crimes. In the US, UK and Germany, chemical castration is being used as an alternative. However, the Indian Penal Code provides only a jail term for sexual offenders.<sup>23</sup>

Even as India's cities are seeing the boom of the middle classes and soaring education and wealth, sexual violence is rearing its head in commercial centres. India is far from being the only culture which denigrates its women, but each culture has to get to grips with the individual way in which it resolves the problem. In India, violence is entrenched through the caste system, religious ideals, social norms and ideas of honour and a woman's status in the home as well as through a pervasive acceptance of domestic violence in many forms. Women's activists are creating strong movements for change in the country, and taboo subjects are being raised through fearless journalism and protest. But it is not enough. Change is needed where institutional sexism is rife: at the heart of India's police force.<sup>24</sup>

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<sup>22</sup> Sexual harassment under India penal code 1860: A critical analysis, *available at*: <http://www.lawgratis.com/2016/02/20/sexual-harassment-under-india-penal-code-1860-a-critical-analysis/> (Last visited on May, 28, 2016)

<sup>23</sup> Rape and sexual offences: Crime & punishment in India, *available at*:

<http://indiatoday.intoday.in/story/rape-and-sexual-offences-crime-and-punishment-in-india/1/238406.html> (Last visited on March 10, 2016)

There is an imperative need to recruit more women in the police force. At this juncture, the Indian administration says one third of Delhi's police force will be made up of women. It is the latest move to try and tackle widespread sexual abuse and violence against women in the Indian capital and hopes to make

the force, 'more gender sensitive.' The move was welcomed on social media, with many users praising the Indian government's stance to improve women's rights. The demand for more women in police forces has been growing since the gang rape of a 23-year-old girl in Delhi on December 16, 2012.

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<sup>24</sup> Schona Jolly, *Violence against India's women can only be tackled by police reform*, available at:

<https://www.theguardian.com/commentisfree/2013/aug/23/violence-india-women-police-rape-mumbai>  
(Last visited on April 12, 2017)