



## Research Paper

# Women Empowerment and Gender Equality: A Study of Indian Constitution

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**Abstract:** The concept of women's empowerment broadly refers to a process that increases women's "options, choices, control and power" through women's own agency. Women's empowerment is recognized as a right in itself as well as a transformative tool with a multiplier effect for achieving progress in all other areas of social and economic development. It is well established that women's empowerment plays a pivotal role in attaining gender equality, poverty reduction and other internationally agreed development goals. Women's empowerment leads to a transformation of the structural factors, social determinants and unequal power relations that underpin widespread and persistent gender inequalities that result in women's unequal access to opportunities and resources across all areas of political, economic, social and cultural life. As women's empowerment is a context-specific, dynamic process with diverse intersecting variables, it remains a latent and unobservable phenomenon. The central question of this paper is how women are empowering through the context of Indian Constitution. This paper also highlights how there is gender equality in India. This paper also discusses some problems, which are obstacles on the path of women empowerment and gender equality. In the conclude part this paper summarize the whole discussion.

**KEYWORDS:** Empowerment, equality, gender, opportunities,

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## I. INTRODUCTION

"The wife is half the men,  
The best of friends,  
The root of the three ends of life,  
And of all that will help in the other world."

- *The Mahabharata*<sup>1</sup>

"Gender equality is more than a goal in itself. It is a precondition for meeting the challenge of reducing poverty, promoting sustainable development and building good governance."

- *Kofi Annan UN Secretary General*

Gender equality implies a society in which women and men enjoy the same opportunities, outcomes, rights and obligations in all spheres of life. Equality between men and women exists when both sexes are able to share equally in the distribution of power and influence; have equal opportunities for financial independence through work or through setting up businesses; enjoy equal access to education and the opportunity to develop personal ambitions. A critical aspect of promoting gender equality is the empowerment of women, with a focus on identifying and redressing power imbalances and giving women more autonomy to manage their own lives. Women's empowerment is vital to sustainable development and the realization of human rights for all.

## CONSTITUTIONAL PROVISIONS FOR GENDER EQUALITY AND WOMEN EMPOWERMENT:

In spite of women contribution in all spheres of life and they enjoy a unique position in every society and country of the world, but they suffer in silence and belong to a class which is in a disadvantaged position on account of several barriers and impediments. India, being a country of paradoxes, is no exception. Here too, women, a personification of Shakti, once given a dignified status, are in need of empowerment. Women's empowerment in legal, social, political and economic requires to be enhanced. However, empowerment and

<sup>1</sup>SrimadBhagwatGeeta Chap-10 stanza 34.

equality are based on the gender sensitivity of society towards their problems. The intensification of women's issues and rights movement all over the world is reflected in the form of various Conventions passed by the United Nations<sup>2</sup>.

Gender equality is always escaped the constitutional provisions of equality before the law or the equal protection of law. This is because equality is always supposed to be between equals and since the judges did not concede that men and women were equal. Gender equality did not seem to them to be a legally forbidden inequality<sup>3</sup>.

As pointed out by Dicey the Constitutional theories of Rule of Law and the fundamental rights stemmed from the struggle for individual liberty and were intended to curb the power of the State. For a long time gender, issues were not in the limelight<sup>4</sup>.

In India, the Constitution makers while drafting the Constitution were sensitive to the problems faced by women and made specific provisions relating to them. In various articles, not only mandates equality of the sexes but also authorizes benign discrimination in favour of women and children to make up for the backwardness, which has been their age-old destiny. But categorical imperatives constitutionals by the Founding Fathers are not self-acting and can acquire socio-legal locomotion only by appropriate State action.

Our Constitution is the basic document of a country having a special legal holiness, which sets the framework and the principal functions of the organs of the Government of a State. It also declares the principles governing the operation of these organs. The Constitution aims at creating legal norms, social philosophy and economic values, which are to be affected by striking synthesis, harmony and fundamental adjustment between individual rights and social interest to achieve the desired community goals.

The Constitution of India contains various provisions, which provide for equal rights and opportunities for both men and women. The silent features are:-

#### **(1) PREAMBLE**

The Preamble contains the essence of the Constitution and reflects the ideals and aims of the people. The Preamble starts by saying that we, the people of India, give to ourselves the Constitution<sup>5</sup>. The source of the Constitution is thus traced to the people, i.e. men and women of India, irrespective of caste, community, religion or sex. The makers of the Constitution were not satisfied with mere territorial unity and integrity. If the unity is to be lasting, it should be based on social, economic and political justice. Such justice should be equal for all. The Preamble contains the goal of equality of status and opportunity to all citizens. This particular goal has been incorporated to give equal rights to women and men in terms of status as well as opportunity.

#### **Political Rights**

Even though the fact that women participated equally in the freedom struggle and, under the Constitution and law, have equal political rights as men, enabling them to take part effectively in the administration of the country has had little effect as they are negligibly represented in politics. There were only seven women members in the Constituent Assembly and the number later decreased further. Their representation in the Lok Sabha is far below the expected numbers. This has led to the demand for reservation of 33% seats for women in the Lok Sabha and Vidhan Sabhas. Political empowerment of women has been brought by the 73rd and 74th Amendments, which reserve seats for women in Gram Panchayats and Municipal bodies<sup>6</sup>. Illiteracy, lack of political awareness, physical violence and economic dependence are a few reasons which restrain women from taking part in the political processes of the country<sup>7</sup>.

#### **Economic Rights**

At hand there has been series of legislation conferring equal rights for women and men. These legislations have been guided by the provisions of the fundamental rights and Directive Principles of State Policy. Here again there is a total lack of awareness regarding economic rights amongst women. Laws to

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<sup>2</sup>Rajput, Pam, (2001), "*Women's Political Participation in India: An Agenda for Empowerment*", Sage Publications, New Delhi.

<sup>3</sup>PramanikRathindraNath and AdhikaryAshim Kumar (Eds), (2006), "*Gender Inequality and Women's Empowerment*", Abhijeet Publications, Delhi.

<sup>4</sup>Dicey, A.V. (1952), "*introduction to the study of the law of the constitution*", Mac Millan, 9th edition London.

<sup>5</sup>Jain, Devaki (ed), (1996), "*Indian Women*", Publication Division of Ministry of Information and Broadcasting, Government of India.

<sup>6</sup>Joseph, Neena, (2001), "*Gender Related Problems of Women, Women's Empowerment and Panchayati Raj*", New Delhi, Himalaya Publications.

<sup>7</sup>Pandey J.N., (2006). "*Constitutional Law of India*", Central Law Agency, Forty Third Edition, Allahabad.

improve their condition in matters relating to wages, maternity benefits, equal remuneration and property/succession have been enacted to provide the necessary protection in these areas.

### **Social justice**

For providing social justice to women, the most important step has been codification of some of the personal laws in our country which pose the biggest challenge in this context. In the area of criminal justice, the gender neutrality of law worked to the disadvantage of a woman accused because in some of the cases it imposed a heavy burden on the prosecutor, for e.g. in cases of rape and dowry. Certain areas like domestic violence and sexual harassment of women at the workplace were untouched, unthought of. These examples of gender insensitivity were tackled by the judiciary and incorporated into binding decisional laws to provide social justice in void spheres. Although a Uniform Civil Code is still a dream in spite of various directions of the Court, the enactment of certain legislations like the Pre-Natal Diagnostic Techniques (Prevention of Misuse) Act and the Medical Termination of Pregnancy Act prevent the violation of justice and humanity right from the womb. In spite of these laws, their non-implementation, gender insensitivity and lack of legal literacy prevent the dream of the Constitution makers from becoming a reality. They prevent the fulfilment of the objective of securing to each individual dignity, irrespective of sex, community or place of birth.

### **(2) FUNDAMENTAL RIGHTS:**

Part III of the Constitution consisting of Articles 12-35 is the heart of the Constitution. Human Rights which are the entitlement of every man, woman and child because they are human beings have been made enforceable as constitutional or fundamental rights in India. The framers of the Constitution were conscious of the unequal treatment and discrimination meted out to the fairer sex from time immemorial and therefore included certain general as well as specific provisions for the upliftment of the status of women.

Justice Bhagwati in *Maneka Gandhi v. Union of India*<sup>8</sup> said:

"These fundamental rights represent the basic values cherished by the people of this country since the Vedic times and they are calculated to protect the dignity of the individual and create conditions in which every human being can develop his personality to the fullest extent."

### **Article: 14 Equality before Law**

The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India.

### **Article: 15 Prohibition of discrimination on grounds of religion, race, cast, sex, or place of birth**

(1) The state shall not discriminate against any citizen on grounds only of religion, race, cast, sex, or place of birth or any of them.

(2) Nothing in this article shall prevent the State from making any special provision for women and children.

Accordingly, Article 15(1) prohibits gender discrimination and Article 15(3) lifts that rigour and permits the State to positively discriminate in favour of women to make special provisions to ameliorate their social condition and provide political, economic and social justice. The State in the field of Criminal Law, Service Law, Labour Law, etc. has resorted to Article 15(3) and the Courts, too, have upheld the validity of these protective discriminatory provisions on the basis of constitutional mandate,

### **Article: 16 Equality of opportunity in matters of public employment**

(1) There shall be equality of opportunity for all citizens in matters relating to employment or appointment to any office under the state.

(2) No citizens shall, on grounds only of religion, race, cast, sex, descent, place of birth, residence or any of them, be ineligible for, or discriminated against in respect of, any employment or office under the state.

The Constitution, therefore, provides equal opportunities for women implicitly as they are applicable to all persons irrespective of sex. However, the Courts realize that these Articles reflect only de jure equality to women. They have not been able to accelerate de facto equality to the extent the Constitution intended.

There is still a considerable gap between constitutional rights and their application in the day-to-day lives of most women. At the same time it is true that women are working in jobs which were hitherto exclusively masculine domains. But there are still instances which exhibit lack of confidence their capability and efficiency. There remains a long and lingering suspicion regarding their capacities to meet the challenges of the job assigned.

In case of *C.B. Muthamma v. Union of India*<sup>9</sup>, a writ petition was filed by Ms Muthamma, a senior member of the Indian Foreign Service, complaining that she had been denied promotion to Grade I illegally and unconstitutionally. She pointed out that several rules of the civil service were discriminatory against women. At

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<sup>8</sup>*Maneka Gandhi v. Union of India* (AIR 1978 SC 597)

<sup>9</sup>*C.B. Muthamma v. Union of India* (1979) 4 SCC 260)

the very threshold she was advised by the Chairman of the UPSC against joining the Foreign Service. At the time of joining she was required to give an undertaking that if she married she would resign from service. Under Rule 18 of the Indian Foreign Service (Recruitment, Cadre, Seniority and Promotion) Rules, 1961, it was provided that no married woman shall be entitled as of right to be appointed to the service. Under Rule 8(2) of the Indian Foreign Service (Conduct and Discipline) Rules, 1961, a woman member of the service was required to obtain permission of the Government in writing before her marriage was solemnised. At any time after the marriage she could be required to resign if the Government was confirmed that her family and domestic commitments were likely to come in the way of the due and efficient discharge of her duties as a member of the service. On numerous occasions the petitioner had to face the consequences of being a woman and thus suffered discrimination, though the Constitution specifically under Article 15 prohibits discrimination on grounds of religion, race, caste, sex or place of birth and Article 14 provides the principle of equality before law.

The Supreme Court through V.R. Krishna Iyer and P.N. Singhal, JJ. Held that:

"This writ petition by Ms Muthamma, a senior member of the Indian Foreign Service, bespeaks a story which makes one wonder whether Articles 14 and 16 belong to myth or reality. The credibility of the Constitutional mandates shall not be shaken by governmental action or inaction but it is the effect of the grievance of Ms Muthamma that sex prejudice against Indian womanhood pervades the service rules even a third of a century after Freedom. There is some basis for the charge of bias in the rules and this makes the ominous indifference of the executive to bring about the banishment of discrimination in the heritage of service rules. If high officials lose hopes of equal justice under the rules, the legal lot of the little Indian, already priced out of the expensive judicial market, is best left to guess."

Commenting further on the discriminatory rules the Court said:

"Discrimination against woman, in traumatic transparency, is found in this rule. If a woman member shall obtain the permission of government before she marries. The same risk is run by government if a male member contracts a marriage. If the family and domestic commitments of a woman member of the service is likely to come in the way of efficient discharge of duties, a similar situation may arise in The case of a male member. In these days of nuclear families, intercontinental marriages and unconventional behaviour, one fails to understand the naked bias against the gentler of the species."

### **Gender equality becomes elusive in the absence of right to live with dignity.**

#### **Article 21 Protection of life and personal liberty.**

"No person shall be deprived of his life or personal liberty except according to procedure established by law. Denial of right of succession to women of Scheduled Tribes amounts to deprivation of their right to livelihood under article 21; Madhu kishwar v. state of Bihar,<sup>10</sup> In Vishaka v. State of Rajasthan<sup>11</sup>, the Supreme Court, in the absence of legislation in the field of sexual harassment of working women at their place of work, formulated guidelines for their protection. The Court said:

"Gender equality includes protection from sexual harassment and right to work with dignity which is a universally recognised basic human right. The common minimum requirement of this right has received global acceptance. In the absence of domestic law occupying the field, to formulate effective measures to check the evil of sexual harassment of working women at all workplaces, the contents of international conventions and norms are significant for the purpose of interpretation of the guarantee of gender equality, right to work with human dignity in articles 14, 15, 19(1)(g) and 21 of the Constitution and the safeguards against sexual harassment implicit therein and for the formulation of guidelines to achieve this purpose."

#### **Article 23 Prohibition of traffic in human beings and forced labour.—**

(1) Traffic in human beings and beggar and other similar forms of forced labour are prohibited and any contravention of this provision shall be an offence punishable in accordance with law.

(2) Nothing in this article shall prevent the State from imposing compulsory service for public purposes, and in imposing such service, the State shall not make any discrimination on grounds only of religion, race, caste or class or any of them.

In Gaurav Jain v. Union of India<sup>12</sup>, the condition of prostitutes in general and the plight of their children in particular was highlighted. The Court issued directions for a multi-pronged approach and mixing the children of prostitutes with other children instead of making separate provisions for them. The Supreme Court issued directions for the prevention of induction of women in various forms of prostitution. It said that women should be viewed more as victims of adverse socio-economic circumstances than offenders in our society.

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<sup>10</sup>Madhu Kishwar v. State of Bihar, (1996) 5 SCC 145)

<sup>11</sup>Vishaka v. State of Rajasthan (AIR 1997 SC 3011)

<sup>12</sup>Gaurav Jain v. Union of India (1997) (8) SCC 114)

**(3) DIRECTIVE PRINCIPLES OF STATE POLICY**

However, Directive Principles of State Policy are not enforceable in any court of law they are essential in the governance of the country and provide for the welfare of the people, including women. These provisions are contained in Part IV of the Constitution. Fundamental Rights furnish to individual rights while the Directive Principles of State Policy supply to social needs.

**Article: 39** certain principles of policy to be followed by the state.

The State shall, in particular, direct its policy towards securing -

(a) That the citizen, men and women equally, have the right to an adequate means of livelihood;

(d) That there is equal pay for equal work for both men and women;

(e) that the health and strength of workers, men and women, and the tender age of children are not abused and that citizens are not forced by economic necessity to enter avocations unsuited to their age or strength;

Article 39(a) directs the State to direct its policy towards securing that citizens, men and women, equally have the right to an adequate means of livelihood.

Article 39(d) directs the State to secure equal pay for equal work for both men and women. The State in furtherance of this directive passed the Equal Remuneration Act, 1976 to give effect to the provision.

Article 39(e) specifically directs the State not to abuse the health and strength of workers, men and women.

**Article: 42** Provision for just and humane conditions of work and maternity relief.—

The State shall make provision for securing just and humane conditions of work and for maternity relief.

Article 42 of the Constitution incorporates a very important provision for the benefit of women. It directs the State to make provisions for securing just and humane conditions of work and for maternity relief. The State has implemented this directive by incorporating health provisions in the Factories Act, Maternity Benefit Act, Beedi and Cigar Workers (Conditions of Employment) Act, etc.

**Uniform Civil Code**

**Article 44** Uniform civil code for the citizens.—

The State shall Endeavour to secure for the citizens a uniform civil code throughout the territory of India.

Article 44 directs the State to secure for citizens a Uniform Civil Code applicable throughout the territory of India. Its particular goal is towards the achievement of gender justice. Even though the State has not yet made any efforts to introduce a Uniform Civil Code in India, the judiciary has recognised the necessity of uniformity in the application of civil laws relating to marriage, succession, adoption, divorce, maintenance, etc. but as it is only a directive it cannot be enforced in a court of law.

However, one of the most dynamic members of the Assembly, Shri K.M. Munshi, expressed his opinion that: "if the personal law of inheritance, succession, etc. is considered as a part of religion, the equality of women can never be achieved."

**(4) FUNDAMENTAL DUTIES**

Parts IV-A which consist of only one Article 51-A was added to the constitution by the 42nd Amendment, 1976. This Article for the first time specifies a code of eleven fundamental duties for citizens.

**Article 51-A (e)** is related to women. It states that;

“It shall be the duty of every citizen of India to promote harmony and the spirit of common brotherhood amongst all the people of India transcending religion, linguistic, regional or sectional diversities; to renounce practices derogatory to the dignity of women”

**(5) ARTICLE: 243 D RESERVATION OF SEATS.(73RD AMENDMENT - I.E. 1-6-1993)**

(1) Seats shall be reserved for—(a) the Scheduled Castes; and(b) the Scheduled Tribes,

In every Panchayat and the number of seats so reserved shall bear, as nearly as may be, the same proportion to the total number of seats to be filled by direct election in that Panchayat as the population of the Scheduled Castes in that Panchayat area or of the Scheduled Tribes in that Panchayat area bears to the total population of that area and such seats may be allotted by rotation to different constituencies in a Panchayat<sup>13</sup>.

(2) Not less than one-third of the total number of seats reserved under clause

(1) shall be reserved for women belonging to the Scheduled Castes or, as the case may be, the Scheduled Tribes.

(3) Not less than one-third (including the number of seats reserved for women belonging to the Scheduled Castes and the Scheduled Tribes) of the total number of seats to be filled by direct election in every Panchayat shall be reserved for women and such seats may be allotted by rotation to different constituencies in a Panchayat.

(4) The offices of the Chairpersons in the Panchayats at the village or any other level shall be reserved for the Scheduled Castes, the Scheduled Tribes and women in such manner as the Legislature of a State may, by law, provide: Provided that the number of offices of Chairpersons reserved for the Scheduled Castes and the

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<sup>13</sup>Joshi, R. P. (ed) (1998), “ *Constitutionalisation of Panchayati Raj. A Reassessment*”, Jaipur, Rawat Publications.

Scheduled Tribes in the Panchayats at each level in any State shall bear, as nearly as may be, the same proportion to the total number of such offices in the Panchayats at each level as the population of the Scheduled Castes in the State or of the Scheduled Tribes in the State bears to the total population of the State: Provided further that not less than one-third of the total number of offices of Chairpersons in the Panchayats at each level shall be reserved for women. Provided also that the number of offices reserved under this clause shall be allotted by rotation to different Panchayats at each level<sup>14</sup>.

(5) The reservation of seats under clauses (1) and (2) and the reservation of offices of Chairpersons (other than the reservation for women) under clause (4) shall cease to have effect on the expiration of the period specified in article 334.

(6) Nothing in this Part shall prevent the Legislature of a State from making any provision for reservation of seats in any Panchayat or offices of Chairpersons in the Panchayats at any level in favour of backward class of citizens.

**(6) ARTICLE: 243 T RESERVATION OF SEATS. (74TH AMENDMENT - I.E. 1-6-1993)**

243T. Reservation of seats.—

(1) Seats shall be reserved for the Scheduled Castes and the Scheduled Tribes in every Municipality and the number of seats so reserved shall bear, as nearly as may be, the same proportion to the total number of seats to be filled by direct election in that Municipality as the population of the Scheduled Castes in the municipal area or of the Scheduled Tribes in the Municipal area bears to the total population of that area and such seats may be allotted by rotation to different constituencies in a Municipality.

(2) Not less than one-third of the total number of seats reserved under clause (1) shall be reserved for women belonging to the Scheduled Castes or, as the case may be, the Scheduled Tribes.

(3) Not less than one-third (including the number of seats reserved for women belonging to the Scheduled Castes and the Scheduled Tribes) of the total number of seats to be filled by direct election in every Municipality shall be reserved for women and such seats may be allotted by rotation to different constituencies in a Municipality.

(4) The offices of Chairpersons in the Municipalities shall be reserved for the Scheduled Castes, the Scheduled Tribes and women in such manner as the Legislature of a State may, by law, provide.

(5) The reservation of seats under clauses (1) and (2) and the reservation of offices of Chairpersons (other than the reservation for women) under clause (4) shall cease to have effect on the expiration of the period specified in article 334.

(6) Nothing in this Part shall prevent the Legislature of a State from making any provision for reservation of seats in any Municipality or offices of Chairpersons in the Municipalities in favour of backward class of citizens<sup>15</sup>.

Article: 243 G. Powers, authority and responsibilities of Panchayats Read with Eleventh Schedule<sup>16</sup>.

243G. Powers, authority and responsibilities of Panchayats -Subject to the provisions of this Constitution, the Legislature of a State may, by law, endow the Panchayats with such powers and authority as may be necessary to enable them to function as institutions of self-government and such law may contain provisions for the devolution of powers and responsibilities upon Panchayats at the appropriate level, subject to such conditions as may be specified therein, with respect to—

(a) The preparation of plans for economic development and social justice;

(b) The implementation of schemes for economic development and social justice as may be entrusted to them including those in relation to the matters listed in the Eleventh Schedule.

## II. CONCLUSION:

The women play a strategic role in the society and in the economy. The status of women in India is not even in all the times. In ancient period, they enjoyed equal status with men, in the medieval period, the position of Indian women deteriorated. During British rule and after independence many efforts are being made for improving the status of women in India. The government of India, by passing timely and essential Acts and implementing rules and regulations trying to empower and strengthen the women. No doubt, the government of India has many weapons to fight for women empowerment, the prompt and strict implementation is quite essential. Unless the Acts, Policies, Rules, Regulations, etc., are strictly implemented the idea of women

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<sup>14</sup>Mahta G. S., (2002), “ *Participation of women in Panchayati Raj System*”, New Delhi, Kanishka Publishers.

<sup>15</sup>Mathew, George, (2000), “ *Status of Panchayati Raj in India-An Overview*”, New Delhi Concept Publishing Company.

<sup>16</sup>Menon, Neveditha (ed), (1999), “*Themes in Politics. Gender and Politics in India*”, New Delhi, Oxford University Press.

empowerment remains unachieved. Hence, the efforts of the government are still inadequate and the process of empowering women in India is long way to go.

**REFERENCES:**

- [1]. C.B. Muthumma v. Union of India (1979) 4 SCC 260)
- [2]. Dicey, A.V. (1952), “ *introduction to the study of the law of the constitution*”, Mac Millan, 9th edition, London.
- [3]. Gaurav Jain v. Union of India (1997 (8) SCC 114)
- [4]. Jain, Devaki (ed), (1996), “ *Indian Women*”, Publication Division of Ministry of Information and Broadcasting, Government of India.
- [5]. Joseph, Neena, (2001), “*Gender Related Problems of Women, Women’s Empowerment and Panchayati Raj*”, New Delhi, Himalaya Publications.
- [6]. Joshi, R. P. (ed) (1998), “ *Constitutionalisation of Panchayati Raj. A Reassessment*”, Jaipur, Rawat Publications.
- [7]. MadhuKishwar v. State of Bihar, (1996) 5 SCC 145)
- [8]. Maneka Gandhi v. Union of India (AIR 1978 SC 597)
- [9]. Mahta G. S., (2002), “ *Participation of women in Panchayati Raj System*”, New Delhi, Kanishka Publishers.
- [10]. Mathew, George, (2000), “ *Status of Panchayati Raj in India-An Overview*”, New Delhi Concept Publishing Company.
- [11]. Menon, Neveditha (ed), (1999), “ *Themes in Politics. Gender and Politics in India*”, New Delhi, Oxford University Press.
- [12]. Pandey J.N., (2006). “ *Constitutional Law of India*”, Central Law Agency, Forty Third Edition, Allahabad.
- [13]. PramanikRathindraNath and AdhikaryAshim Kumar (Eds), (2006), “ *Gender Inequality and Women’s Empowerment*”, Abhijeet Publications, Delhi.
- [14]. Rajput, Pam, (2001), “ *Women’s Political Participation in India: An Agenda for Empowerment*”, Sage Publications, New Delhi.
- [15]. SrimadBhagwatGeeta Chap-10 stanza 34.
- [16]. Vishaka v. State of Rajasthan (AIR 1997 SC 3011)