



## Constitutional Obligation of the State towards Protection of Women \*

### INTRODUCTION

The architects of the constitution of India, keeping in mind the deteriorating state of women and children provided safeguards that, not only grant equality to women and children, but also place an obligation upon the State to adopt measures of positive discrimination in favour of women and children to neutralise the cumulative social, economic, and political backwardness faced by them over the decades. Yet, nearly 65 years later, with ever increasing violence and its various manifestations that women and children are subjected to, we are faced with an ominous reality. The sculptors of the Indian constitution felt, that if India was to become a true democracy, it was necessary to provide the women and children of this country with equal and appropriate opportunities. They thought it to be the sine qua non that propels India on the path of progress and development. However, while various provisions exist in the Constitution, these cannot act for themselves and require active State intervention and action in order to be a change agent for our society.

### Fundamental Rights

Part III of the Indian Constitution, which enshrines the Fundamental Rights from Article 12-35, bestows upon men, women and children certain rights, which cannot be compromised with, except in certain special circumstances. These Fundamental Rights intend to provide the citizens of India with a surety for democratic development.

Article 14 states that, "*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, ".....*prohibits discrimination against any citizen on grounds of religion, race, caste, sex, or place of birth or any of them.*"

This was intended to create a society, which was truly egalitarian in nature, and devoid of discriminatory practices detrimental to the progress of the country. This article explicitly seeks to curb any practices, which are overtly discriminatory in nature.

In *C.B. Muthamma v. Union of India* (1979)<sup>1</sup> Ms. Muthamma, a senior member of the Indian Foreign Service, filed a writ petition complaining that she had been denied promotion to Grade I, an action of the state, which she felt, was illegal and unconstitutional. She pointed out that several rules of the civil service were discriminatory against women and that there was an inherent bias even in the UPSC against the women for joining the Foreign Service. At the time of joining, she was required to give an undertaking that she would resign from service upon marriage. Under Rule 18 of the Indian Foreign Service (Recruitment, Cadre, Seniority and Promotion) Rules, 1961, it was provided that no married woman shall be

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<sup>1</sup> 1979 AIR 1868, 1980 SCR (1) 668

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 solemnized. Further, at any time after her marriage she could be required to resign if the Government was of the view 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. She pleaded that on numerous occasions she had to face adverse consequences of being a woman and suffer discrimination. The court impressed upon the Government of India "....the need to overhaul all service rules to remove the stains of sex discrimination, without waiting for ad-hoc inspiration from writ petitions or gender charity...." This judgment of the Supreme Court ensured that henceforth, it was not mandatory for women officers in the IFS to seek government permission for getting married.

A similar decision was given in *Air India v. Nargesh Meerza* (1981)<sup>2</sup> where it was held that Air India regulations placing a bar on marriage of airhostesses were discriminatory on the grounds of sex and were thereby held unconstitutional by the court. This goes on to show that despite clear provisions in the Constitution that provided for equal treatment for women, the historical bias has crept in some of the statutes, rules and regulations that were inherently loaded against women and required active judicial intervention at regular intervals in motivating the government in rectifying them in order to truly bring forth the intention of Article 15.

On the positive side, Article 15(3) permits the State to positively discriminate in favour of women and make special provisions to improve their social condition and provide political, economic and social justice. In *Govt. of A.P. v. P.B. Vijayakumar*<sup>3</sup> (1995) the Supreme Court held, that reservation to the extent of 30% made in the State Services by the Government of Andhra Pradesh for women candidates was valid. The Division Bench of the Supreme Court emphatically declared that the power conferred upon the State by Article 15(3) is wide enough to cover the entire range of State activity including, employment under the State. This power to discriminate positively, which is conferred upon the Government to enable women to become active participants in the nation's progress, must be made use of often in order to improve the status of women in society.

Article 16, which calls for Equality of Opportunity in matters of public employment, in no way belittles the power of Article 15 (3), for there are provisions which, enable the Government to make reservations for any class of citizens which are not adequately represented in the services of the State.

Article 21, which deals with protection of life and personal liberty of an individual, has far greater implications for women, than any other class of citizens, for it can be used as a tool to demand protection from unfair restrictions placed upon them by the society, which hamper their quality of life and well being.

In *Madhu Kishwar v. State of Bihar*<sup>4</sup> (1996), the Supreme Court dealt with the validity of the Chhotanagpur Tenancy Act, 1908 of Bihar, which denied the right of succession to tribal women as violative of the right to livelihood. The majority judgment however upheld the validity of legislation on the ground of custom of inheritance/succession of Scheduled Tribes. Dissenting with the majority, Justice K.Ramaswamy, felt that the law made a gender-based discrimination and that it violated Articles 15, 16 and 21 of the Constitution and felt that "Legislative action should be devised suitably to constitute economic empowerment of women in socio-economic restructuring for establishing egalitarian social order." Public opinion was mixed, and some felt that in this case the judicial pronouncement was not in consonance with Article 21 of the Constitution.

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<sup>2</sup> 1981 4 SCC 335

<sup>3</sup> 1995 (4) SCC 520

<sup>4</sup> 1991 SCR, Supl. (1) 477 1992 SCC (1) 102

In its landmark judgement in *Vishaka v. State of Rajasthan*<sup>5</sup>(1997), the Supreme Court formulated guidelines based on international conventions and norms against sexual harassment of women at workplaces something, which was non-existent till then in the legislative realms. The court took over the responsibility to uphold the provisions of gender equality and the right to work with human dignity as provided in Articles 14, 15, 19(1) (g) and 21 of the Constitution.

Article 23, which prohibits trafficking in human beings and forced labor, assumes greater importance as women and children are both susceptible to this vicious crime of trafficking. Prostitution, child labor and slavery seriously compromise the dignity and quality of life of an individual. In *Gaurav Jain v. Union of India*<sup>6</sup> (1997), the condition of prostitutes in general and the plight of their children in particular were highlighted. The Court issued directions for a multi-dimensional approach and integration of the children of prostitutes with other children instead of making separate provisions for them. The Supreme Court also issued directions to prevent 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 in such cases. Unfortunately, the bias in the police against women in such cases continues to exist and women continue to be abused, exploited and victimised in what is often called as the oldest profession in the world.

### **Directive Principles of State Policy**

Directive Principles of State Policy as enshrined in Part IV of the Constitution though not enforceable by any court of law have immense importance in the way State influences the society and our culture. They are “fundamental” in the way the country is governed and the State is duty-bound to apply these principles while formulating laws and other instruments of state policy.

Article 39, deals with the State's responsibility to establish a social order for the promotion of welfare of the people. Looking at the current scenario where crimes against women and children are on the rise, and the laws have clearly had no deterrent effect on the same, the State appears to have fallen short of the aspirations of the framers of the constitution. According to the annual report of the National Crime Records Bureau for 2013, 24,923<sup>7</sup> rape cases were reported across India in 2012 with instances of marital rapes being fairly common. The most disgraceful aspect being, that till recently there was no legal provision that recognised marital rapes. Dowry deaths, molestations and acid attacks continue to be on the rise and underline our failure to evolve into a fair, just and equitable society.

Article 42, provides for just and humane conditions for work and maternity relief and expects the State to make provisions regarding the same. The Maternity Benefit Act, 1961 was a welcome step in this direction though there still exist various loopholes in this act, which are unfair to pregnant women. During the 11th Five Year Plan, the government took steps to ensure safe and secure motherhood through various schemes such as the Janini Suraksha Yojana to encourage institutional deliveries and the Indira Gandhi Matritva Sahyog Yojana for conditional cash transfers to mothers during their pregnancy. Though steps have been taken to achieve the objectives of Article 42, there is much more that needs to be done.

Article 44, calls for a Uniform Civil Code across the country. In the opinion of Shri K.M. Munshi, one of the members of the Constituent Assembly, women equality can never be achieved as long as personal laws relating to inheritance, divorce etc. remain in force. While, The Family Courts Act, 1954, The Special Marriage Act, 1954, The Hindu Marriage Act, 1955, The Hindu Succession Act, 1956 amended in 2005, The Dowry Prohibition Act, 1961,

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<sup>5</sup> AIR 1997 SC 3011

<sup>6</sup> 1997 (8) SCC 114

<sup>7</sup>National Commission on Population, National Population Policy 2000-Objectives, National Commission on Population, Government of India (2000) ([http://populationcommission.nic.in/npp\\_obj.htm](http://populationcommission.nic.in/npp_obj.htm))

The Prohibition of Child Marriage Act, 2006 etc. having been put into force have provided equality to women in at least some areas relating to civil laws, nonetheless the need for a Uniform Civil Code still exists in order to provide women of all faiths equality in the society. Article 45, as amended in 2002 provides for early childhood care and education to children below the age of six years. The Government of India, provides grants to recognized orphanages for the welfare of children up to 6 lakh rupees per year for every ten children, but the fate of millions of children still continues to hang in balance for they are not properly cared for or educated on account of poverty. The state of these orphanages too is questionable and the standard of care they provide might not be adequate.

Article 47, states that the State has a duty to raise the level of nutrition and the standard of living and to improve public health. A 2011 report 'The World's Women and Girls'<sup>8</sup>, released by the Washington-based Population Reference Bureau, shows that 47% of women in India between the ages of 20 and 24 were married by 18 and this had severe health complications for them and resulted in anaemia or stillbirths and miscarriages. The State clearly needs to strengthen its existing structure of public health and promote awareness related to nutrition during pregnancy as well as the ill effects of early marriage. Due to age-old practice of discrimination, girls often lag behind boys in nutrition, and this societal malady needs to be rectified at the earliest.

### **Statutory Provisions**

Following up on the provisions in the Constitution on Fundamental Rights and the Directive Principles of State Policy the Government enacted several laws that have several provisions, which protect the rights of women and children.

The Indian Penal Code has exhaustive provisions dealing with punishments for crime against women. Punishment for kidnapping and abduction related to women are provided in Sections 366, 366A, and 366B. Provisions related to prostitution are found in Sections 372 and 373, sexual offences are dealt under Section 375-376D and outraging the modesty of women is covered under section 509. While Section 493-498 deals with offences pertaining to marriage, the malaise of dowry and punishment for dowry deaths is dealt under Section 304-B. There are also various legislations that the parliament has passed in an effort to protect and ameliorate the status of women<sup>9</sup>. In India there has been a significant increase in the numbers of rape cases in the last 10 years. According to National Crime Records Bureau, in 2012, 25000 rape cases were reported<sup>10</sup>. The brutal gang rape case in Delhi in December 2012, led to the passage of a stricter Law i.e. The Criminal Law (Amendment) Act 2013 to deal with the rape cases in India.

There are specific legislations for some of the serious crimes and prejudices that existed against women for ages. The Dowry Prohibition Act 1961, The Suppression of Immoral Traffic (Prevention) Act 1956, The Commission of Sati (Prevention Act) 1987, are some of the laws that have been enacted to tackle these serious maladies affecting our society. In South India some states have passed the Devadasi System (Prohibition and dedication Acts) to tackle the problem of temple prostitution.<sup>11</sup> The Parliament has also passed several statutes such as Indecent Representation of women Act 1986, Medical termination of pregnancy Act 1971, Maternity benefit Act 1988, Equal Remuneration Act 1987 to protect

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<sup>8</sup> The World's women and Girls, Population Reference Bureau 2011

<sup>9</sup> VK Dewan, Law Relating to offences against women, 14-18 (2<sup>nd</sup> ed. 2000)

<sup>10</sup> National Commission on Population, National Population Policy 2000-Objectives, National Commission on Population, Government of India (2000) ([http://populationcommission.nic.in/npp\\_obj.htm](http://populationcommission.nic.in/npp_obj.htm))

<sup>11</sup> Indu Prakash Singh Women, Law and Social Change in India, 104-105 (1<sup>st</sup> ed. 1989)

women and female children in line with the spirit of the Constitution to uplift and protect women.

Article 51A of our Constitution states that, "*It shall be the duty of every citizen of India to renounce practices derogatory to the dignity of women.*" While Fundamental Duties may not be legally enforceable in a court of law, yet the existence of this article shows the mindset of our lawmakers and their intention to provide a society where women could live with dignity and prosper alongside men as equal partners.

While the historic 73<sup>rd</sup> and 74<sup>th</sup> amendments provided for one third reservation of women in the local bodies, it is so unfortunate that the law makers have still not mustered enough courage to provide for the same in the Parliament and the state legislatures. Women holding political power and aspiring political positions at the highest level continue to depend mostly on family lineages with little support from the existing political system.

### **Violation of Women Rights**

Prof. Amartya Sen coined the phrase "missing women" when he found out that in developing countries the proportion of women as compared to men is suspiciously low<sup>12</sup>. The preference for a son is a phenomenon, which is historically rooted, in the patriarchal system of the Indian society. The low status of women goes on with the practice of infanticide, foeticide, sex-selective abortion which has become common due to the amniocentesis technology, and mal-nourishment amongst girl children<sup>13</sup>. The strong preference for having a son emerged with the transition of the Indian society from primitive stage to a feudal stage where agriculture emerged as the primary occupation of the people. In India it is estimated that around "10 million female foetus have been aborted in the last 20 years"<sup>14</sup>. In spite of the fact that the Government of India has declared pre birth sex determination through the use of amniocentesis as unlawful, termination of female foetuses is still widely prevalent.

In India, the unusual dowry deaths of the women at their matrimonial home have been increasing at a startling rate. Dowry disputes are a serious problem. According to the National Crime Records Bureau, in 2012 around 8200 newlywed brides were killed for dowry. In spite of the fact that Section 498A as well as 304B of the Indian Penal code strongly deal with the person responsible for marital cruelty and have declared taking and giving of dowry as a crime, this cancerous disease is still to be uprooted from our society. The reasons for domestic aggression are primarily ingrained in the patriarchal nature of the Indian society, which supports such violence at home. The desire for endowments and money is a major cause, even when the Dowry Prohibition Act and the Protection of Women from Domestic Violence Act and cruelty under Section 498 A of the Indian Penal Code in 1983 declares brutality to a woman in her conjugal house a punishable and non bailable offense.

Sati, an abominable custom of burning widows alive on the funeral pyres of their husband, was abolished in pre-independent India, yet this practice continued to prevail in some parts after independence as well. The discourse on sati was invigorated again in 1986 when a young bride from Rajasthan named Roop Kanwar was set on fire on the pyre of her husband. As a consequence in 1987, the Sati Prevention Act was passed which declared the

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<sup>12</sup> Sen Amartya, Missing Women, British Medical Journal,304, 587-588 (1992)

<sup>13</sup> Kishwar Madhu, Where daughters are unwanted, Manushi,86, 15-22 (1995)

<sup>14</sup> Sen Amartya, Missing Women, British Medical Journal,304, 587-588 (1992)

practice of sati a crime for which death penalty can also be given to the perpetrators of such crime.

The Child Marriage Act, 2006 prohibits child marriage and declares 18 years and 21 years as the marriageable age for the girls and boys respectively. According to the National Population Policy, over 50% of the girls are still married below the age of 18, resulting in a typical reproductive pattern of 'too early, too frequent, too many'.<sup>15</sup> Domestic violence, especially sexual violence perpetrated by husbands, which is so common in such cases, has severe effect on the innocent mind and body of the child.<sup>16</sup>

It is now an accepted fact that one of the most critical areas of empowerment for women is 'Education'. Although, the right to education under Article 21 of the Indian Constitution has made it compulsory for the government to provide free education to every child below 14 years of age, 100% female literacy still remains a distant dream. In spite of the fact, that Sarva Shiksha Abhiyan has been successful in bringing the girl child back to the schools, yet their retention rate in the school is much lower as compared to their males. In fact, it has been found that there is a gradual drop out of the girl students as they move up to the higher classes. The reasons are not difficult to guess either. Numerous studies have concluded that the same factors viz; inherent bias against the girl child in the family, female child as a source of domestic help to the mother, early marriage, and finally investment on the education of the girl being seen as a waste since in any case she is going to go to another family as a girl after marriage.

The initiative on a discourse on sexual harassment of women at their workplace in India started with Supreme Court's guidelines in the Vishaka case in 1997. However, it was the passage of the 'Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Bill 2013' that helped in translating these guidelines into concrete rules that are to be implemented. But even today, "the issue of sexual harassment has largely been swept under the carpet in India. The provisions have never been successfully invoked because of social taboos still associated with sexual harassment"<sup>17</sup>.

## **Child Rights**

Traditionally, the Indian parents have exercised immense control on their children. Societal norms gave them uncontrolled and unchecked power when it came to the 'welfare' of their children. While this power has been used positively in families, which are not grappling poverty, in other cases this has led to some serious detrimental effects for children belonging to the poor. The problem of child labour has thus become one of the worst problems that modern Indian society faces. The children are often forced to work in inhuman as well as precarious conditions. Children also face not only violence at home but also sexual abuse. Child marriages are prohibited yet child marriages are still performed. By recognising the efforts of Sh. Kailash Satyarthi and his organisation Bachpan Bachao Aandolan towards children in India and awarding him the Nobel Peace Prize in 2014, the global community has drawn the attention of all to the magnitude and gravity of this problem. When the constitution was framed the makers were aware of the existing conditions, this led to the enactment of special provisions in the constitution.

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<sup>15</sup> VK Dewan, Law Relating to offences against women 273-277 (2<sup>nd</sup> ed.2000)

<sup>16</sup> Paras Dewan & Peeyushi Dewan, Women and Legal protection (1<sup>st</sup> ed.1994)

<sup>17</sup> Paras Dewan & Peeyushi Dewan, Women and Legal protection 375-378 (1<sup>st</sup> ed.1994)

Article 15, deals with non-discrimination and contains a special provision for protective and positive discrimination for children. Clause (3) lays down "*Nothing shall prevent the state from making any special provision for women and children.*" There are also various other articles that attempt to protect children. Article 21 A, seeks to provide free and compulsory education to children below 14 years of age, Article 24, prevents employment of children in hazardous workplaces, Article 39F, provides for children to be given opportunities and facilities to develop in a healthy manner and in conditions of freedom and dignity and that childhood and youth are protected against exploitation and against moral and material abandonment.

Article 45, places the burden upon the State to provide free and compulsory education to all children between the age of six to fourteen years in such manner as the State may, by law, determine. There are also various legislations and statutory law that have been passed by the parliament such as the Child Labor (Prohibition and Regulation) Act 1986, Children Act 1960 etc. that seek to protect and uplift children.

### **National Policy Frameworks for Women and Children**

The National Policy for Children, 1974 was the first policy document concerning child needs and rights. The goal of this policy was to ensure that the constitutional provisions for children and the UN Declaration of Rights are implemented. It outlines the services that the state should provide for the complete development of a child, before and after birth and throughout a child's period of growth. The Government of India prepared a "National Policy for the Empowerment of Women" in the year 2001. The goal of this policy is to bring about the advancement, development and empowerment of women.<sup>18</sup> Both these policies recognize that the existing state of women and children needs urgent attention of the Government and there is a dire need of policy intervention in order to uplift their status in the society and bring them up to the levels of progress the country is achieving.

The national policy for women empowerment aims to make judicial systems more gender sensitive and responsive and calls for a revamp and structuring of new laws, which impart quick justice to the victim. It seeks to involve all stakeholders to limit gender discrimination especially in areas related to personal laws regarding inheritance, divorce etc. It also seeks to make women active participants in decision-making and even recommends affirmative action such as reservations and quotas so as to make women a part of the developmental process. The policy also seeks to provide economic and social empowerment to women through programmes oriented towards women skill development and microcredit and cooperative facilities as well as providing working environment conducive for women. The Rashtriya Mahila Kosh was set up in 1993 for battling socio-economic constraints of poor women particularly in rural and unorganized sector for their economic upliftment. The main aim of this is to provide micro credit and livelihood generating facilities to poor women. The Government has also introduced gender budgeting in various ministries to ensure that the provisions for gender equity lead to appropriate budgetary allocations. The Rajiv Gandhi National Crèche Scheme also encourages women to continue gainful employment and in addition to day-care facilities the crèche also provides nutrition and health care to children. It also provides schemes for workingwomen hostels along with day care facilities for their children. Though the Government aspires to fulfill all the objectives of this policy the percentage of working women remains low and maternal mortality rate remains portrays a picture of failure and shows a lack of implementation of the recommendations of this policy.

The National Policy for Children is a brief document, which does not encompass or address all the issues faced by children. One of its aim is to provide guidelines to provision for

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<sup>18</sup> National Policy framework for women, <http://wcd.nic.in/empwomen.htm> (last checked on December 31, 2014).

health, nutrition as well as free education to children below 14 years of age. The 86<sup>th</sup> Constitutional Amendment in Article 21A has fulfilled the objective of making Education a Fundamental Right.<sup>19</sup> The Policy also says that the children must be protected from neglect, abuse and cruelty and necessary amendments must be done in existing laws to provide for welfare of children. It also calls for the constitution of the National Children's Board to plan and uphold the rights of children. Recently, there has been a move to expand this policy in order to provide a more robust framework for the protection and progress of children in India.

## Remedial Measures

There exists an urgent need to change the status quo of women and children in our country. A multi pronged strategy needs to be evolved to assess the core causes of exploitation and violence against women and children. There is an imperative need to recognize that the state alone cannot improve the situation. While the state would have to mandatorily provide the legal framework and instruments that protect the rights of women and children and promote their cause, it is the societal mindset that has to undergo a change. As Mahatma Gandhi said, " Be the change, you wish to see in the world". We, as individuals, families, and social groups have to take affirmative action against child labour, child trafficking, exploitation of children, female foeticide, and sexual violence against the children. We have to make sure that girls and women have equal opportunities at home and work place. Every family and organization has to provide an environment that brings out the best in the girl and women and propels her to achieve hitherto unknown levels of excellence. The state and society must provide instantaneous support to victim-survivors to ensure that the victims can carry on with their daily life. In dealing with the problem of violence against women innovative levels of coordination and integration must be built up between government, civil society and the family. Continuous, extensive, unconditional, financial, as well as emotional assistance must be provided to the women by both the formal set-up of the state like legal system, police, medical and health care sectors etc. as well as from the informal networks such as family, friends, fellow citizens, and local community groups. The idea of self-reliant independent women taking independent decisions of her life can be achieved only by educating them. This will help them in achieving economic independence, as well as knowledge and awareness about their rights. Special emphasis must be provided in educating women on the legal and human rights provided to them by the constitution. A well-known feminist writer Martha Nussbaum argued that the key to development of women is to provide them with the cover of justice.

The first organ of the state that deals with the crime and the victimized woman is the Police. Often, crimes against women go unregistered and many times insensitive handling of these cases fails to provide justice to the victims. Therefore, formal training and gender sensitization of police must be done. The state cannot be insensitive to its citizens and their plight. An organ of the state cannot, and should not be allowed to become a vicarious oppressor. The judiciary, which is responsible for providing justice to the aggrieved women, should also be sensitized on gender issues.

The women's organizations must try to empower women by changing the attitudes of the society towards the harmful traditional practices. One of the most vital tasks of the various women organizations and NGOs is to help women in rebuilding their lives and confidence. These goals can be achieved only if the women are adequately educated about their legal rights and are economically independent enough to take independent decisions of their own

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<sup>19</sup> National Policy Framework for children, [http://www.dcy.gov.in/documents/cypp\\_framework/BetterOutcomesBetterFutureReport.pdf](http://www.dcy.gov.in/documents/cypp_framework/BetterOutcomesBetterFutureReport.pdf) ( last checked on January 2, 2015)

life. Such programmes if done within shelter homes can provide both counseling and a connection among the women's who were victimized. Incorporating progressive viewpoints from different stakeholders must develop the National Policy Frameworks.

Violence against women can be curtailed only when cultural norms and attitudes towards the women can be changed for which change should be made in the school curriculum. Curriculum that educates the students at the school, college and university level on issues like human rights and gender issues should be included in their study material. "Curriculum reform that works towards eliminating the gender stereotyping in schools (teaching about women's contributions in history class, eliminating sex stereotypes in textbooks, promoting girls participation in sports) are important steps in achieving gender equality"<sup>20</sup>.

The violence against women in India is often supported and perpetuated by indigenous cultures in the name of 'honour'. Such indigenous communities must try to put up mechanisms and strategies that eliminate such age-old ruthless practices against women. We also need to interpret the sacred manuscripts and doctrines with an idea to encourage egalitarianism and self-respect for women. No religion sanctifies unjust treatment of women and children. Children are the future of a nation and, if we don't nurture our plants well today, how would we reap healthy fruits tomorrow, and as Swami Vivekananda once said " ..... That country and that nation which do not respect women have never become great, nor will ever be in future".



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<sup>20</sup> Sutapa Saryal ,Women's Rights in India: Problems and Prospects,<http://www.isca.in/IJSS/Archive/v3/i7/9.ISCA-IRJSS-2014-84.pdf>