



SEXUAL HARASSMENT AT WORKPLACE; A CASE STUDY OF FILM INDUSTRY*

ABSTRACT:

Gender equality is basic human right which is given by the Constitution of India. Sexual harassment is considered as a violation of a women's fundamental right to equality, which guaranteed by Article 14 and 15 and 21 of Indian Constitution. Article 19(1) (g) of the Constitution which includes a right to a safe environment free from harassment to women.

Sexual harassment in work place creates an insecure and hostile work environment to discourage women's participation in work and affect their social and economic growth. The Supreme Court of India has issued guidelines called the Vishakha Guidelines. Parliament took 16 years to codify it into a law. India's first legislation for the issues of Sexual harassment i.e Prevention of Work place Sexual Harassment act was enacted in 2013 by the Ministry of Women and Child Development, India.

The paper explores sexual harassments in the workplace within the selected organizations namely Bollywood Industry. Every year thousands of young men and women lead to the city of Mumbai in search of their Bollywood dream, but for many the experience becomes a nightmare. The BBC's RajniVaidyanathan and PratikshaGhildial spoke to several actresses who say they have been sexually harassed by directors and casting agents.

In the year 2006 a "Me Too" movement was started by a African American civil rights social activist Tarana Burke against the sexual molestation, sexual abuse.

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The paper tries to overview the legal provisions of the act and simplifies them in order to making it easy to understand by a layman and to find out a possible solution to curb this menace in general and in particular namely film industry .

KEY WORDS- Sexual Harassment, Film Industry, Me Too Campaign, Women

SEXUAL HARASSMENT AT WORKPLACE

Introduction

What is Sexual Harassment?

Sexual harassment at workplace is a global problem whether it is a developed country, or under developed country or developing country. Sexual harassment is generally defined as a uninvited or undesirable behaviour of sexual nature. It is a problem having sexual negative effect on both male and female. It is consider more frequent in females because of our society. India is a male dominating society and they cannot consider any women equal to them. Women are consider as a most vulnerable section in the society.

The # Me too movement is having a clear impact on the reporting of sexual harassment cases across the country. According to new data from the Equal Employment Opportunity Commission (EEOC), workplaces around the nation have seen a significant jump in the year since the campaign went mainstream.

Tarana Burke originally founded the # Me too movement in 2006, but it became part of national conversation in October 2017 following the sexual assault allegations against Harvey Weinstein. Over the course of the last 12 months , the phrase # Me too has been used as a mantra for people to share countless stories of sexual harassment or assault often involving high profile men in position of power.

But while allegations against the public figures make making headlines, the movement is having an effect that spreads far beyond what winds up in newsprint. While overall complaints have gone down this year, charges of sexual harassment are up. According to NBC news around 7500 complaints of harassment have been received between October 2017 and September 2018. That marks a 12% increase compared to the complaints filed in 2016.

The EEOC has also filed 41 sexual harassment lawsuits over past year, a 50% increase from the previous year. Meanwhile visits to the EEOC's sexual harassment webpage have also more than doubled in the year since # Me Too took off.

This marks the first time in at least 8 years that the agency has seen an increase in the filing of harassment complaints.¹ In India 69% of the respondents who said they have faced sexual harassment revealed it took place at their work premises, physical contact and advances being the most common form of sexual harassment. The # Me too movement which exposed cases of sexual harassment in Bollywood and the media industry gained momentum about 80% of the respondents in an online survey said such cases at workplace go unreported.²

Definition

Sexual Harassment is defined as undesirable sexual welcome, requests, or sexual favour or any other physical conduct of sexual nature which feels a person offended or uncomfortable, humiliated. In general term it can be understood as unwanted direct or indirect sexual touch, contact or remarks by the male superior authority or colleagues against their female colleagues at any workplace.

The Preventive and Eliminative Programme of Sexual Harassment established at workplace to provide secure employment condition, especially for female workers employment sector. This department at workplace has been established by the Labour Department with the purpose to take cognizance of sexual harassment cases and taking further steps and disciplinary action against the accused. The sexual harassment is categorized into 5 types –

1. Verbal harassment- It means when a person insults, criticize verbally in front of general public.
2. Non-verbal harassment- It is one of the most general type of harassment at work place. It is in the form of violence. In its acute condition known as assault. The person may be abused by pushing, punching or slapping in public.

¹ Michelle Regaldo, Following # Me too workplace Sexual harassment complaints spiked, Oct 15,2018

² Express Web Desk, # Me too movement:78% say sexual harassment at work place goes unreported, reveals survey, October17,2018.

3. Visual harassment- When any person is shown pornographic pictures, sexual objects, or any pictures which intended to cause sexual excitement. Then it will be consider as Visual Harassment.
4. Psychological harassment- Sometimes harassment can be of psychological nature and can have a negative impact on the victim. When a victim listen any condescending remarks that can affect him/her on personal as well as professional level then it is said to be psychological harassment.
5. Physical harassment- Sexual harassment is when the wrongdoer behaves in a sexual way towards the victim who is clearly uncomfortable then it is called physical harassment. This is also called Quid Pro Quo sexual harassment. In this case the superior makes sexual favour from the victim and if victim doesn't taken up then a threat or negative impact will be happen. ³

This department is established to investigate any matter of sexual harassment case at workplace. The report can be made to by a call , personal visit to the nearest Labour Department office or by sending the report letter to labour Department. The report shall contain the below basic information-

1. The name and address of the accuse person
2. Detail description of the matter sexual harassment
3. The sender name and address (the victim)

The department focus on the Sexual Harassment Preventive and Eliminative Programme at workplaces as effort to promote the internal mechanism about the sexual harassment handling a workplace, whereby objectives are as bellow –

1. To aware people about the function and the process of the department in handling the sexual harassment at workplace
2. To encourage the employer to establish the internal sexual harassment happen to the or to their close individual.

³ www.thebalancecareers.com/types-of-harassment-in-the-workplace-2060886 access on 29th December

3. To aware people about right against exploitation.

Reason of Sexual Harassment at workplace

Reasons for sexual harassment of women at workplace are mentioned below-

1. Patriarchal Structure

The main reason behind most of the violence is that Indian society is a male dominating society. Men always consider as a superior from females in every aspects of life. This superiority complex discriminates various kinds of discriminatory practices against women. Thus a male colleague would not like his female co-employee to work with him equally or working in higher position in the office and to make her feel inferior and uncomfortable in order to harass her, different kinds of violence like indecent images, sexual remarks, unwelcome conduct etc used by the male colleagues.

2. Sexual Perversion

Women are employed in both private as well as public sector, such men have got chance to indulge in sexual perverted.

3. Jealousy at workplace

This is also consider a main reason for crime against women in workplace. As our Indian society is a male dominated society a male cannot consider women in higher position in the field of career. Promotion or incentives given to a female colleague by her employer would not like by a male employee. And in jealousy he may harass her sexually as well as mentally.

4. Feeling of Contempt and Disrespect

Apart from above reasons due to feeling of contempt and disrespect females are sexually harass. Women are consider as a materialistic object for men. In our society we consider women as Goddess Durga but treated ill manner.⁴

England

⁴ www.google.co.in/amp/s/www.indiacelebrating.com/social-issues/sexual-harassment-of-women-at-workplace/amp/?espv=1 access on 30th December

In England the birthplace of common law , where the roots of our legal traditions exist, sexual harassment is tried under section 154 of Criminal Justice and Public Order Act, 1994 which has inserted a new section 4-A into public order act. It states that:

“4-A(i) A person guilty of an offence if, with intent to cause a person harassment alarm or distress, he:

- (a) Uses threatening abusive or insulting words or behaviour or disorderly behaviour, or
- (b) Displays any writing sign or other visible representation which is threatening , abusive insulting thereby causing that or another person harassment , alarm, or distress”

“5-A(i) A person is guilty of an offence if he:

- (a) Uses threatening , abusive or insulting words or behaviour or disorderly behaviour; or
- (b) Displays any writing, sign or other visible representation which is threatening , abusive, or insulting, within the hearing or sight of a person who is likely to be caused harassment , alarm or distress.”

These provisions were designed primarily to deal with incidents of racial violence and racial harassment. Their utility in dealing with sexual harassment is therefore circumspect.

Judicial Pronouncement

Vishaka’s Judgement: An initiative taken by Judiciary against sexual harassment

In 1997 the Supreme Court mandated the Vishaka guidelines to prevent sexual harassment of women at workplace. Many women’s groups felt that the guidelines which provide a clear definition of sexual harassment, were revolutionary as they laid down an extensive framework to prevent such cases.

Freedom from sexual harassment is a vital aspect of women’s right to safe work environment. However it is important to recognise that SHW is not exclusively a “ women’s issue”. It is a labour issue that involves the rights of all workers/ employees. And it is an issue closely connected to freedom of expression in general and the freedom of the media in particular. It is widely accepted that the safety and security of journalists are essential prerequisites for press freedom. Sexual

harassment besides violating women's right, threatens the safety and security of a growing number of journalists who happen to be women and thereby threatens press freedom.⁵

There was a time when managements did not have the benefit of legislation spelling out what constitutes SHW and what employers are supposed to do about such behaviour, especially but not only on the rare occasions when it brought to their attention. However, that age of innocence came to an end 16 years ago, when the Supreme court of India crafted what became widely known as Vishaka guidelines. The 1997 guidelines were in operation until recently because the government had not yet notified the necessary rules under the Sexual Harassment of Women at Workplace (prevention, Prohibition and Redressal) Act 2013, which was passed by Parliament earlier this year and received the President's assent in April (the rules were finally notified on December 9).

Both the laws firmly place on employers the onus for preventing and deterring SHW, as well as for taking all the necessary steps to thoroughly investigate and effectively deal with complaints about such torment, including prosecution when it is called for under the law. The Act actually lists 10 different and wide-ranging "duties of the employer".

The guidelines require formation of complaint committees against sexual harassment at workplaces and placed the responsibility of ensuring a professional environment free of sexual harassment and gender violence on the employer. It fixed accountability. However, even after 15 years, the guidelines have not been complied with in most workplaces. The guidelines have been complied with in workplaces after the incidence of "Delhi Gang Rape".

Guidelines given by Justice Verma in Vishaka Case⁶

1. Duty of the employer or other responsible persons in workplaces and other institutions:

It shall be given the duty of the employer or other responsible persons in workplaces or other institutions to prevent or deter the commission of acts of sexual harassment by taking all steps required.

2. Definition

⁵ Joseph, Ammu, "Tehelka Debacle may yet serve a constructive purpose if it catalyses the action within the media towards establishing in-house mechanisms as mandated by law", Chennai, Frontline, 27 December, 2013

⁶ Vishaka and others V. State of Rajasthan, 1997SC384

For the purpose, sexual harassment includes such unwelcome sexually determined behaviour (whether directly or by implication) as-

- a) Physical contact and advances
- b) A demand or request for sexual favours,
- c) Sexually coloured remarks,
- d) Showing pornography,
- e) Any other unwelcome physical , verbal or non-verbal conduct of sexual nature.

Where any of these acts is committed in circumstances where-under the victim of such conduct has a reasonable apprehension that in relation to the victim's employment or work whether she is drawing salary, or honorarium or voluntary , whether in government , public or private enterprises such conduct can be humiliating and may constitute a health and safety problem . It is discriminatory for instances when the women has reasonable grounds to believe that her objection would disadvantage her in connection with her employment or work environment. Adverse consequences might be visited if the victim does not consent to the conduct in question or raises any objection thereto.

3. Preventive Steps

All employers or persons in charge of work place whether in public or private sector should take appropriate steps to prevent sexual harassment. Without prejudice to the generality of this obligation they should take following steps-

- (a) Express prohibition of sexual harassment as defined above at the work place should be notified, published and circulated in appropriate ways.
- (b) The Rules and regulations of Government and Public Sector bodies relating to conduct and discipline should include rules /regulations prohibiting sexual harassment and provide for appropriate penalties in such rules against offender. As regards private employers , steps should be taken to include the aforesaid prohibition in the standing orders under the Industrial Employment(Standing Orders) Act,1946.
- (c) Appropriate work conditions should be provided in respect of work , leisure , health and hygiene to further ensure that there is no hostile environment towards women at

work places and an employee woman should have reasonable grounds to believe that she is disadvantaged the connection with her employment.

4. Criminal Proceedings

Where such conduct amounts to specific offence under the Indian Penal Code or under any other law , the employer shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority. In particular , it should ensure that victims or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

The Victim of sexual harassment should have the option to seek transfer of the perpetrator their own file.

5. Disciplinary action

Where such conduct amounts to misconduct in employment as defined by the relevant services rules, appropriate disciplinary action should be initiated by the employer in accordance with those rules.

6. Complaint Mechanism

Whether or not such constitutes an offence under law or a breach of the service rule an appropriate complaint mechanism should be created in the employer's organisation for redress of the complaint made by the victim. Such complaint mechanism should ensure time bound treatment of complaints.

7. Complaint Committee

The complaint mechanism referred to above , should be adequate to provide , where necessary a Complaint Committee , a special counsellor or other support service , including the maintenance of confidentiality. The Complaint Committee should be headed by a woman and not less than half of its member should be woman. Further, to prevent the possibility of any undue pressure or influence from senior level such Complaint Committee must make an annual report to the government department concerned of the complaints and action taken by them. The employers and person in charge will also report of the Complaints Committee to the Government department.

8. Worker's Initiative

Employees should be allowed to raise issue of sexual harassment at a worker's meeting and in other appropriate forum and it should be affirmatively discussed in Employer-Employee Meetings.

9. Awareness

Awareness of the rights of female employees in this regard should be created in particular by prominently notifying the guidelines in the suitable manner.

10. Third Party Harassment

Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the employer and the person in charge will take the cognizance and will take reasonable steps to assist the affected person in terms of support and preventive action. The Centre and State governments are requested to consider adopting suitable measures including legislation to ensure that the guidelines laid down by this order are also observed by the employers in Private Sector. These guidelines will not prejudice any rights available under the Protection of Human Rights Act, 1993.⁷

Sexual harassment act: How it comes into limelight

It take over 16 years to interpret the Supreme Court's landmark judgement in the Vishaka case into law, with the parliament finally passing the Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 in February. The government had to pass the legislation due to Delhi rape case. Over 8 months the law remains on paper only as the Ministry of Women and Child Development has failed to notify even after the President's assent. But after the Tehelka journalist case the ministry again woke up and tried to speed up the matter.

The law to check sexual harassment at work place which prescribes strict punishment such as termination of service for the guilty and similar penalties in case of a frivolous complaint as come into effect.

This act makes it mandatory for all the offices with 10 or more employees to have an internal complaints committee to address grievances in a stipulated time or face penalty. Sexual harassment cases at workplace including against domestic help, will have to disposed of by in-house complaint committee within 90 days failing which a penalty will be imposed and repeated non-compliances

⁷ Mamta Rao, Law relating to Women and Children, 1999 Edition, Hardbound

of the provision of the law can even lead to cancellation of licence or registration of the organisation. Sexual harassment at work place may lead to termination of service of the accused, withholding of promotions and increments and payment of reasonable compensation to the complainant. According to the rules if allegation against the accused turn out to be false and after inquiry are found to be made with a malicious intent the complainant may face similar penal provisions as listed for the accused. Sexual harassment according to the law, includes unwelcome acts or behaviour like physical contact and advances a demand or request for sexual favours or making sexually coloured remarks or showing pornography.

The sexual Harassment of Women at workplace (Prevention, Prohibition, and redressal) Act,2013

This act will ensure that the women are protected against sexual harassment at all the workplace be it in public or private. This will contribute to realisation of their right to gender equality , life and liberty and equality in working conditions everywhere. The sense of security at the workplace will improve women's participation in work, resulting in their economic laid down by the Supreme court of India in Vishaka V. State of Rajasthan⁸. Article 19(1) g of the Indian Constitution affirms the right of all the citizens to be employed in any profession of their choosing or to practice their own trade or business. Vishaka V. State of Rajasthan established that actions resulting in a violation of one's right to "gender equality" and Life and Liberty is in fact of violation of the victim's fundamental right under article 19 (1)g. The case ruling establishes that sexual harassment violates a women's rights in the workplace and is thus not just a matter of personal injury.

Main features of the act

1. The definition of "aggrieved women" who will get protection under the Act is extremely wide to cover all women , irrespective of her age or employment status, whether in the organised or unorganised sectors, public or private and cover clients, customers and domestic workers as well.
2. While the workplace in the Vishaka guidelines is confined to the traditional office setup where there is a clear employer-employee relationship, The act goes much further to include organisation , department, office, branch unit etc, in the public and the private

⁸ 1997 SC 384

sector organized unorganized , hospitals nursing homes, sports, stadiums, and any other place visited by the employee during the course of employment including transportation.

3. The committee is required to complete the inquiry within the period of 90 days. On completion of the inquiry, the report will be sent to the employer or the district officer as the case may be they are mandated to take action on the report within 60 days.
4. Every employer is required to constitute an internal complaints Committee at each office or branch with 10 or more employees. The District officer is required to constitute a local complaints committee at each district and if required at the block level.
5. The complaints committee have the power of civil courts for gathering evidence.
6. The complaint committee requires to provide for conciliation before initiating an inquiry if requested by the complainant.
7. Penalties have been prescribed for employers. Non-compliance with the provisions of the Act shall be punishable with a fine of Rs. 50000. Repeated violations may lead to higher penalties and cancellation of license or registration to conduct business. ⁹

Sexual Harassment: Case Study of Bollywood Industry

Every year thousands of young men and women le to the city of Mumbai in search of their Bollywood dream, but for many the experience become a nightmare. The BBC's Rajni Vaidyanaltha and Pratiksha Ghildial spoke to several actresses who say they have been sexually harassed by directors, Casting Agents and Co-Stars.¹⁰

Both Men and Women can be a victim of sexual harassment. However it is most common to women, be it a women in Corporate Sector or a film industry, for the past decade it is most common

⁹ Dr. S.R Mayeni, Women And Law, 2nd Edition 2011

¹⁰ Rajni Vidyananthan: My Me Too experience BBC 16 October 2017

practice in Bollywood industry. In 2014 the Research was conducted by one of the researcher named Zoe Margolis¹¹ where the author had experienced that the less women are behind the scenes. This is because of widespread Sexism, Discriminatory hiring practice in certain departments and also the Nepotistic old Boy's network whereby you only get a job because you are son, brother, nephew or cousin of another man in the industry. However, It is not only sexism that control to the lack of women, some of it is there to flagrant sexual harassment too.

The actresses faces many problems during their journey to film industry, for instance they are subjected to day-to-day taunts about her body shape and had to put up with constant insinuation, which will eventually led to quit the job. Sexism, racism and discrimination on the production are few of the harassment faced by the actresses. If they happen to outline the sexual harassment that once experienced, she will probably get more harassed and will never get a chance to work again because the perpetrator probably win some money in the court.

Maneka Gandhi¹² had instructed all the Bollywood studios to comply with the sexual Harassment at workplace act 2013 and to set up a Internal Complaint Committee. Huff Post India instructed seventeen major establishments to inquire into this matter and to check if they have followed the ministry's direction or not. Only seven production house confirmed they have anti-sexual harassment cells. Five shared specific information while the two declined the same and rest of them did not reply to the matter. As per law a company must set up an Internal Complaints Committee where at least three persons of total majority of which must be consisted of women representative who must in senior position within the organization and third party member attached to an NGO. also suggested companies must conduct and regulate workshops to sensitise employees.

Bollywood Industry and ME TOO Campaign

Me Too Movement is a global campaign against sexual harassment and assault where women from all over the world open up and express their harrowing stories throwing light on sexual abuse prevalent in our society. This movement trace back to the act of 2017 after sexual misconduct

¹¹ London based author, journalist and talking head working across books, print, television, radio and web.

¹² Union Minister for women and child development

allegations against former American Film Producer Harvey Weinstein¹³ were made public. After that many women in Western Countries came forward and shared stories of sexual harassment. The movement finally arrived in India and women from media and entertainment industry came forward to share their experiences. In recent interview former actress Tanushree Dutta accused Actor Nana Patekar of sexual harassment. This news appears to have triggered a series of similar posts by women journalists on social media sharing their agonising experiences with seniors.

Former Bollywood actress Tanushree Dutta spoke to various Indian TV news channels and media about the sexual harassment she faced in the industry and about her frustration with a futile police complaint she filed in 2008.¹⁴ In 2005 Bollywood movie propelled by Tanushree Dutta and Imran Hashmi was released which showed a physical intimacy on screen where the main characters are seen kissing in a famous song 'Aashiq Banaya Aapne'.

After that film, the actress Tanushree Dutta given a several movie where her cast were expected to wear redolent clothing and dance suggestive (commonly known as Item number). Later in 2008, one of her co-actor reputedly touched her unseemly while shooting a dance scene. She complained to the director and choreographer but nothing happened, instead asked her to insist that she continue with filming, threatening consequences otherwise. Actress let the set only to be admonish the director and choreographer as "Unprofessional and Uncooperative". Actress abandon acting soon after and spent years recovering the trauma before eventually moving to United States.

On September 2018, while on trip to India, Tanushree Dutta recalled the incident to a some of the journalist. Her interview went viral. Social media and her friends expressed cooperation and narrated their own experiences of abuse, intimidation and widespread sexism. The media industry was hit the hardest. Many actor and actresses, comedians, journalist and film-makers were unmask for their chauvinist predacious way. "I have been repeating the same story since 2008"¹⁵. "The only thing that's changed is that people suddenly want to listen"¹⁶.

¹⁴ Rajnish Kakade/ The Associated Press

¹⁵ Tanushree Dutta told in a interview with BuzzFeed News

¹⁶ *ibid*

High profile actresses from Bollywood industry from 1970's superstar Zeenat Aman to 1994 Miss World Aishwarya Rai Bachan, had shared torment personal accounts years before Tanushree herea. These stories engender heated debates at the time but little corrective actor. Aishwarya Rai Bachan and Salman Khan ,who reputedly assaulted her , remains one of the India's highest-paid actors. In most of these cases sub sisters are dismissed or threatened with legal consequences and professional boycott.

In a strange development last year, Saroj Khan Choreographer said that “ casting Couch” behaviour offering women work in the industry for sexual favours was widespread in Bollywood Industry, but added it was one way to earn living.

Tanushree Dutta Says “I had seen in parties women were willing to do anything to get step in Bollywood industry, for which they had taken for granted, that this was something they had to resolve”.

Additionally, Richa Chadha¹⁷ in a interview with The Indian Express said that “ Sexual harassment is not just limited to Bollywood so intone out the film industry and asking what they are doing about it is not wholly right. She further says it is easy to target Bollywood as it gets people Television Rating Point (TRP). After Tanushree Dutta several other actresses spoke about sexual harassment at workplace and have come forward with the stories of harassment experienced by them. Richa Chadha said that “we need to evaluate where we went wrong as a society so women were not comfortable enough to speak about harassment openly and freely. “ we all have to look within ourselves and figure out how is it that we govern the culture that women did not feel safe to come forward and report any kind of verbal or physical assault. A person can be nice men but there might be a other side of him which may not be aware of”¹⁸.

Following are some of the list of prominent name who have been caught in the web of Mee Too allegations so far:

¹⁷ Indian actress who works in Hindi Films

¹⁸ Richa Chadha in an Interview with IndianExpress.com

1. M.J Akbar – M.J Akbar is the Former Union Minister who is accused of several women journalist including Pallavi Gogoi¹⁹, Priya Ramani²⁰, Tushita Patel²¹ etc, came out with detailed accounts of alleged sexual misconduct. Akbar when he held senior post at various media organizations.
2. Rahul Johri – CEO of BCCI was accused of misbehaviour by an unnamed person who claims to be an Ex- Colleague of Johri at the Discovery Channel.
3. Ashish Patel- is a Vice- President of Brand Partnership and Talent Management and business and creative Head of Y-Films was accused of Japleen Parichal shared an anonymous actresses post in which she claimed that Ashish allegedly took her in a drive and tried to kiss her.
4. Mukesh Chhabra- Casting Director is accused of two aspiring actress being sexually harassed.
5. Shubash Ghai- is a well -known Director in the Bollywood industry. A woman had accused the film-maker of raping her. Recently T.V actress and model Kate Sharma also accused the director of forcefully hugging and kissing her.

Status of women in Bollywood

The research conducted by Ananya Bhattacharya there exist a huge on screen gender gap. For instance, over the fifty years percentage of male are mentioned on average 30 times per plot on Wikipedia compared to females cast members who are mentioned only ten times .

As per analysis of Wikipedia entries on 4000 Bollywood movies between 1970 to 2017 by IBM and two Delhi based organisation showed that male characters are mentioned nearly twice as many times as their female counterparts. Female characters are mostly described as ‘beautiful’ ‘Attractive’ where men characters are called strong and successful ,there are scenes where most women go on to marry, engaging themselves in household activities, whereas men are likely to

¹⁹ Chief-Business Editor of NPR

²⁰ National Features Editor at ‘Mint’

²¹ Personal Assistant of Big Business/ Author of Cookbook

kill, Shoot etc. A popular trope of romantic stories features the male character stalking, bullying and berating his paramour after which they live happily ever after²².

SL.No	MALE PORTRAY	FEMALE PORTRAY
1.	An honest government employee	Young Girl
2.	An aspiring Singer	Daughter of some Mr. Khanna
3.	An established Assistant Scientist	Is heart-broken
4.	A secret wing of Indian Army	A stage dancer
5.	Famous Professor	Not so good looking

Fig: Male-Female Introduction in Bollywood Industry

The above portray table clearly indicates that an actresses role is not given as much importance as actors. Women are also mostly missing in production, directions and cinematography²³. The report of researched by Zoe Margolis in the ‘The Guardian’ shows only 22 percent out of total members in the industry are on major roles or films and are under-represented in the film industry. ²⁴

Bollywood Movies have mainly been about stereotypes. Characters, situations and have largely been driven by stereotypical ideologies. According to the research released by the Geena Davis Institute on Women in Media supported by UN Women and The Rockefeller Foundation, which claimed Indian films ranks the top in objectifying women on screen. A sample survey showed Indian films mainly depict the women in sexualised roles be it a major films or small perfume advertisements. Objectifying women on screen has been a prime issue that Indian films have been battling with. Besides, our films have been infamous for depicting female characters in set stereotypical frames. However, we can see

²² Ananya Bhattacharya Quartz India, 23 October, 2017

²³ [https://www. Google/amp/sqz/.com/India](https://www.Google.com/amp/sqz/.com/India) Quartz India

²⁴ https://www.theguardian.com/film/2014/jul/22/movie_industry

the changes that is taking place in Bollywood industry from the last four to five years where women has been given a major role to play instead of being just a trophy in the film.²⁵

CONCLUSION

The conclusion of the research across the Bollywood industry are depressing when it comes to the sexual harassment that still takes place among the various actresses. The number of allegations of sexual harassment at workplace including Bollywood industry has increased over the past couple of years. Traditionally and historically female employees in India were conservative in their approach and preferred to ignore rather than to use the formal complaint mechanism set up by the employer, it appears that now they are more aware of their legal rights especially the employer's obligation to provide them with a harassment free working environment. Therefore rapid and fierce movement like Me Too movement can only help reclaim women public space in highly paid patriarchal society like India. There is a urgent need for a gender justice for a harassment issue and a perpetrator of such issues be punished and has to be taken within the judicial framework and has to approach to the court of law. Ultimately Rule of Law has to be expected, and stringent law has to be enforced. This is the only way in which we see justice as far as this matter is concerned.

The new act places an onus on employers to have proper committee and complaints cell in working place which will provide support and courage to victims to come forth. Although this obligations has existed since 1997 in *Vishaka Guidelines*²⁶ which has a force of law but employers did not take the dictate seriously.

Justice and empowerment are the ultimate goals. A critical mass can only be reached and more and more women are speaking about their harrowing experiences that they have faced in the past and present. Women should be able to speak out as speaking out gives closures to survivors and victims, its high time women reclaimed public space in a highly patriarchal society. Me Too movement is probably a movement which gives courage and confidence to several women to speak about stories which had happened years ago and also give courage and platform to women to speak

²⁵ Dear Zindagi, Padmavati, Queen etc

²⁶ Vishaka and ors Vs. state of Rajasthan and ors, AIR 1997 SCC 3011

what actually happened to them. The main aim is not to bring every perpetrator out rather, to stop this similar things happening in the future.

Women all over the world are historically, traditionally treated discriminately by the men. Therefore fierce movement like this can only bring the change in society. Me Too movement is positive platform where several women are coming up with their issues especially sexual harassment at workplace, abuse, etc. So let us not confuse with the Right to Reputation, Articles 21 (*Right to life and personal liberty*) and article 19(*Freedom of speech and expression*). If you feel so aggrieved, you have the remedy under law so does the women. Let her exercise that positively.

