



UNDERSTANDING OF SEXUAL HARASSMENT AT WORKPLACE AND LAW IN ACTION

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ABSTRACT:

Sexual harassment at work is the absolute reverse of gender equality, which has been pushed for all over the world. It is a kind of gender discrimination that violates Articles 14, 15, 19, and 21 of the Indian Constitution, which guarantee a woman's right to equality and right to life. These Articles guarantee every Indian citizen, regardless of gender, the right to equal protection under the law, the right to live a life free from any kind of discrimination, and the right to protection of life and personal liberty. On July 9, 1993, India signed the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW). After the horrific gang rape of Bhanwari Devi, a social worker from Rajasthan, a petition was brought for the first time before India's supreme court in 1997 to uphold the fundamental rights of working women. In this research paper, one of the most important causes is the male-dominated organisational structure. For example, a lot of the harassment women face at work isn't "sexual" in nature or intent, but it's done to show that men are in charge. In organisations, women usually have less power in the hierarchy than men, so sexual harassment is one way for the powerful to keep control. When they started looking for a job in an organisation, whether it was an educational institute, a private business, or the government, they were harassed and given sexual favours by the person in charge. In exchange, they were promised a job, which is what led to sexual harassment of women. The current research suggests that the most important thing to do at this point is to examine the problem in greater detail and come up with preventative actions that could better evaluate the situation.

Keywords: Sexual Harassment, Women, Workplace, Causes, Vishaka guidelines.

INTRODUCTION

"I measure the progress of a community with the degree of progress which women have achieved."

-Dr. B.R. Ambedkar.

The United Nations Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), adopted by the UN General Assembly in 1979 and ratified by India, is often referred to as an international bill of human rights for women because it promotes the equality of women and men in terms of human rights and fundamental freedoms in the political, economic, social, cultural, and civil spheres¹. It stresses that the concept of equal rights is violated when discrimination against women and attacks on women's dignity occur. Further, the advent of rapid industrialization, modernization, economic development, and globalisation has undoubtedly

¹ H.O. Agarwal, *International Law and Human Rights* 494 (Central Law Publication, Allahabad, 15th edn., 2018).

led to a constant increase in the rate of women's employment in the organised sector in a broad variety of areas and at a multiplied rate. However, this has opened the door to a wide range of risky behaviour, including discrimination based on gender and sexual orientation in the workplace.² Sexual harassment is the unwanted annoyance of sexual needs in a relationship with an imbalance of power. It is almost like an epidemic that has a negative influence on the wellness of women in all aspects of their lives, including their physical health, mental health, social lives, and financial wellbeing.³ It encompasses both verbal and nonverbal action of a sexual character, as well as physical contact, the demand for sexual favours, showing obscene statements or pornography, and showing coloured remarks.⁴ Women who are subjected to sexual harassment go through both physical and mental torment as a result of it. Since more women have entered the workforce, sexual harassment has manifested itself in a variety of new forms. When it came to harassing women in the workplace, both co-workers and supervisors pulled out all the measures and used a wide variety of tactics. As a result of the fact that it fosters a culture in the workplace that is unhealthy and less productive, sexual harassment is commonly regarded as the most serious type of violence on a global scale. This recognition stems from the fact that it has been around for a very long time.⁵ To ensure gender equality in the workplace, all forms of discrimination and violence, including sexual harassment, must be prohibited. The internationally recognised principles of equality and non-discrimination on any basis form the basic foundation of human rights protection and are incorporated in the constitutions of the most of the world's countries. When viewed through the lens of an organisation, a workplace, these basic human rights take the form of basic labour and workforce rights. They are essential for long-term development.⁶ Women have always played important roles in families. Women are now recognised for their worth in the workplace and are involved in a variety of work activities in addition to their usual household chores. Building a society in which women may live freely without fear of oppression, exploitation, or discrimination is critical for ensuring a brighter future for the next generation.⁷

What is Sexual Harassment?

The following are the laws concerning sexual harassment:

According to The Sexual Harassment at The Workplace (Prevention, Prohibition and Redressal) Act, 2013⁸:

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

² S.C. Srivastava, "Sexual Harassment of Women at Workplace: Law and Policy", 39 *Indian Journal of Industrial Relations* 364-390 (2004).

³ Rupanjana De, *Prevention of Sexual Harassment at Workplace: Law, Practice & Procedures* 1.1 (Bloomsbury Publishing India Pvt. Ltd., New Delhi, 1st edn., 2022).

⁴ Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (Act 14 of 2013, s. 2(n)).

⁵ A. Thomas, "Incidents of Sexual Harassment at Educational Institutions in India: Preventive Measures and Grievances Handling" 02 *International journal of Recent Advances in Multidisciplinary Research* 0317 (2015).

⁶ *Id.* at 3.

⁷ A.H.D.Pushpa Latha, "Women Issues and Challenges at Workplace" *Tejasvi Astitva: Multi-lingual Multi-disciplinary Research Journal* (2019).

⁸ The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (Act 14 of 2013), s. 2(n).

The following are the laws concerning sexual harassment. As a result of the growing prominence of this issue, S. 354A was added to the IPC⁹ by way of the Criminal Law (Amendment) Act, 2013, which enumerates the conduct that constitute sexual harassment offences.

- physical contact and advances involving unwelcome and explicit sexual overtures; or
- a demand or request for sexual favours; or
- showing pornography against the will of a woman; or
- making sexually coloured remarks

Previously, there were no applicable laws within the Indian Penal Code. Three provisions of the Indian Penal Code (Sections 94, 354, and 509) dealt with such crimes. However, these prohibitions are portrayed as crimes that either constitute public obscenity or are perceived to violate the modesty of women. While Section 294 of the Indian Penal Code applies to both men and women, the latter two are geared exclusively toward women.

INTERNATIONAL CONVENTIONS AND GLOBAL COMMITMENTS TO ADDRESS SEXUAL HARASSMENT IN THE WORKPLACE

➤ THE UN CHARTER, 1945

The United Nations Charter¹⁰ promotes gender equity. To "reaffirm faith in fundamental human rights, in the dignity and worth of the human person, and in the equal rights of men and women" is one of the key purposes of the Charter. In addition, one of the purposes of the United Nations, as stated in Article 1 of the Charter, is to promote respect for human rights and fundamental freedoms without regard to the person's race, sex, language, or religion. This is one of the purposes of the United Nations. This position of the United Nations regarding non-discrimination with regard to the gender of a person is reaffirmed in Article 13 and Article 55.¹¹

THE UNIVERSAL DECLARATION OF HUMAN RIGHTS, 1948

The Universal Declaration of Human Rights (UDHR), which was approved by the United Nations in 1948, is not a treaty but rather an international document.¹² For the aims of the United Nations Charter, it enshrined all of the fundamental freedoms and rights that human beings are entitled. Out of the 58 countries that were members of the United Nations at the time, 48 of them, including India, voted in favour of the declaration. The remaining 10 either did not vote or refrained from voting on whether or not to support the declaration, but not one of them voted to oppose it. Despite its lack of binding force¹³, the UDHR is widely recognised as the pillar of international human rights law. Its principles have

⁹ The Indian Penal Code (Act 45 of 1860).

¹⁰ It is the founding document of the United Nations. After the second world war this document was signed on 26th June in San Francisco laying down the base of the UN.

¹¹ Rupanjana De, *Prevention of Sexual Harassment at Workplace: Law, Practice & Procedures* 2.1 (Bloomsbury Publishing India Pvt. Ltd., New Delhi, 1st edn., 2022).

¹² Originally published on 10th December 1948.

¹³ It is regarded as customary international law and not enforceable in courts.

served as the basis for subsequent international treaties, human rights instruments, and legal codes. Today, all 193 countries that are part of the UN have signed at least one of the 9 international agreements that are based on the UDHR.¹⁴

INTERNATIONAL COVENANT ON CIVIL AND POLITICAL RIGHTS, 1966

The ICCPR is an important international human rights treaty. It guarantees the right to life, freedom from torture and slavery, liberty and security of the person, due process in criminal and legal proceedings, equality before the law, freedom of movement, freedom of thought, conscience, and religion, freedom of association, rights relating to family and children, citizenship, and political participation, and minority group rights to their culture. The ICCPR makes it a mandatory for member states that have signed it to protect and keep the basic human rights listed above. Since this Covenant is a law, the governments of member states that have ratified it are required to take administrative, judicial, and legislative steps to protect these human rights and provide effective solutions when they are infringed. The ICCPR was signed by India on April 10, 1979.

INTERNATIONAL COVENANT ON ECONOMIC, SOCIAL & CULTURAL RIGHTS, 1966

The UN General Assembly passed the ICESCR on December 16, 1966. It guarantees certain economic, social, and cultural rights, such as the right to work under fair and good conditions, the right to equal pay for equal work, the right to form a trade union, rights related to marriage, pregnancy, and child protection, the right to a decent standard of living, the right to health, the right to education, the right to culture and science, and so on. The governments of member states that ratify the convention are required to pass laws that make sure their citizens can enjoy these human rights. Similar to the ICCPR, India ratified the ICESCR on April 10, 1979.

CONVENTION ON ELIMINATION OF ALL FORMS OF DISCRIMINATION AGAINST WOMEN, 1979

CEDAW is an international treaty adopted by the United Nations General Assembly on 18th December, 1979. It is also called the international bill of rights for women because it helped bring the rights of women into the spotlight of human rights issues. CEDAW requires member states that sign it to end discriminating against women and work to make sure women have the same rights as men. It asserts what kind of discrimination is wrong and makes a proposal for how the entire nation can cooperate to end it. (CEDAW) requires States Parties to take necessary steps to eliminate discrimination against women in all sectors, including equality under the law, government and politics, the workplace, education, healthcare, and all aspects of public and social life.¹⁵

¹⁴ *Id.* at 11.

¹⁵ The Convention on the Elimination of All Forms of Discrimination against Women, 1979. Available at <https://www.un.org/womenwatch/daw/cedaw/cedaw.htm>.

WORLD CONFERENCE ON HUMAN RIGHTS, VIENNA, 1993

The World Conference on Human Rights, held in Vienna in 1993, aimed to evaluate the current state of the human rights machinery. A special emphasis was placed on violence against women, which was left untreated since it was deemed to be a part of people's private lives, beyond the reach of the state. The Conference adopted the Vienna Declaration and Program of Action, which states that *"the human rights of women and of the girl child are an intrinsic, integral, and indivisible component of universal human rights."*

FOURTH WORLD CONFERENCE ON WOMEN AT BEIJING, 1995

In September 1995, the Fourth World Conference on Women established the Beijing Principles of the Independence of the Judiciary, which were based on the outcomes of the previous three world conferences on women.¹⁶ The Beijing Declaration and Platform for Action focused on 12 key areas where women's human rights must be respected. It also had a plan for empowering women and making men and women equal.

UNITED NATIONS MILLENNIUM SUMMIT, 2000

The leaders of 189 countries met at this summit and agreed upon eight development goals (called the Millennium Development Goals or MDGs) to be completed by the year 2015. Goal 3 of the Sustainable Development Goals focuses on empowering women and achieving gender equality in the world. This goal also has measurements for how many women work for pay in the non-agricultural sector and in national parliaments, but there are no benchmarks or deadlines for these.

UNITED NATIONS CONFERENCE ON SUSTAINABLE DEVELOPMENT, 2012

This United Nations gathering, also known as Rio+20 or the 2012 Earth Summit, was the third such international conference devoted to the topic of sustainable development. Twenty years after the United Nations Conference on the Environment and Development was held in Rio de Janeiro, Brazil, in 1992, heads of state gathered there in June 2012 to discuss the implementation of agreements signed at that conference. This summit's conclusions were presented in a booklet titled "The future we want."

This document says that action on all parts of sustainable development needs to be based on gender equality and women's full participation. It demanded the abolition of discriminatory laws and equal access to justice for women.

¹⁶ The Fourth World Conference on Women, 1995. Available at <https://www.un.org/womenwatch/daw/beijing/platform/>

ILO VIOLENCE AND HARASSMENT CONVENTION, 2019

This is the first international labour guideline that addresses workplace violence and harassment. The Convention defines "violence and harassment" as behaviours, acts, or threats that are intended to cause or are likely to cause physical, psychological, sexual, or economic harm. It obligates members to provide workplaces free of violence.¹⁷

CONSTITUTIONAL SAFEGUARDS AGAINST SEXUAL HARASSMENT AT WORKPLACE

The right to work with dignity and equality is universally acknowledged under both Indian law and international conventions. Our Constitution guarantees the protection of all women from discrimination and the advancement of their right to equality. According to Article 19(1) (g) of the Constitution of India, every citizen has the right "to practise any profession or to engage in any occupation, trade, or business". Every woman has a fundamental right to participate in public employment, but sexual harassment deprives her of this right and forces her to avoid such employment. Sexual harassment of a woman at her place of employment exposes her to a substantial risk and hazard that places her in an unequal position vis-à-vis other employees, which hinders her ability to exercise her constitutionally protected right under Article 19(1)(g). In addition to being a violation of the right to life and personal liberty, sexual harassment of women in the workplace is also a violation of Article 21, which states that no one shall be deprived of his life or liberty.¹⁸ The right to livelihood is a fundamental component of the right to life. Sexual harassment is an infringement on the right to livelihood. In accordance with Article 21 of the Indian Constitution, every woman is entitled to the eradication of gender-based hurdles and discrimination in order to live a meaningful life. Since the 'Right to Work' is dependent on the provision of a safe working environment and the right to live with dignity, sexual harassment must be eradicated for these rights to have any value.

The preamble of the Indian Constitution states that it will ensure "equality of status and opportunity" for all its citizens. Sexual harassment violates this fundamental objective of the Constitution's framers. The idea of gender equality enshrined in our Constitution would be rendered ineffectual if a woman's right to privacy is not accorded the same significance as her right to protection of life and liberty under Article 21 of the Indian Constitution.¹⁹ Considering that sexual harassment of women in the workplace destroys their sense of dignity and their right to make a living with dignity, it is indirect violation of their fundamental and human rights.²⁰

¹⁷ Rupanjana De, *Prevention of Sexual Harassment at Workplace: Law, Practice & Procedures* 2.11 (Bloomsbury Publishing India Pvt. Ltd., New Delhi, 1st edn., 2022).

¹⁸ *Narendra Kumar v. State of Haryana*, JT, (1994) 2 SCC 94.

¹⁹ *Mohini Jain v. State of Karnataka*, AIR 1992 SC 1858.

²⁰ Astha Poonia, "Sexual Harassment at Workplace" 5 *Amity International Journal of Juridical Sciences* 50 (2019).

THE EVOLUTION OF LAW ON SEXUAL HARASSMENT IN INDIA

The way a society treats its most vulnerable members frequently determines its progress; women and children are among the most vulnerable in a culture like ours, and protecting their rights is essential. Sexual harassment of women in general and sexual harassment at work are things that put women in more danger. A strong way to stop this goes a long way toward protecting their interests. The Supreme Court's decision in *Vishaka & Ors. v. State of Rajasthan & Ors.*²¹ was a big deal because it set out detailed rules for how to deal with the problem of sexual harassment of women at work. The decision was made by Chief Justice Verma, Justice Sujata V. Manohar, and Justice B.N. Kripal, who made up a bench of three judges.

To ensure that women in the workforce are able to exercise their rights guaranteed by Articles 14, 19, and 21, Vishaka and other women's organisations filed a public interest litigation (PIL) against the State of Rajasthan and the Union of India. The petition was filed when social worker Bhanwari Devi was gang raped in Rajasthan for trying to stop a child marriage.²² The Supreme Court of India made the recommendations binding by citing the right to equality and dignity guaranteed by the Indian Constitution and the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). As a result of this case, the Court issued a set of guidelines commonly referred to as the "Vishaka Guidelines" to prevent sexual harassment in the workplace:

- The employer or other responsible parties in workplaces or other institutions must take all necessary means to prevent or deter sexual harassment and offer mechanisms for its resolution, settlement, or prosecution. To this purpose, the following preventative measures should be taken by all public and private sector employers and those in control of workplaces -
 - Sexual harassment in the workplace must be expressly prohibited and properly reported, published, or circulated.
 - Rules and Regulations of Government and PSUs pertaining to conduct and discipline must also contain rules and regulations preventing sexual harassment and providing suitable punishments for violators.
 - Employers in the private sector should incorporate the aforementioned prohibitions into their standing orders under the Industrial Employment (Standing Orders) Act of 1946.
 - There shall be no hostile environment towards women at workplaces, and no female employee should have reasonable grounds to assume that she is at a disadvantage in connection with her employment. This includes providing suitable working conditions in terms of work, leisure, health, and hygiene.

²¹ *Vishaka & Ors. v. State of Rajasthan & Ors.*, AIR 1997 SC 3011.

²² Sobha Saxena, *Crimes against Women and Protective Law* (Deep and Deep Publications Pvt. Ltd, New Delhi, 2008).

- The chairperson of the complaint committee must be a woman, and at least half of its members must be female. For effectiveness in handling complaints, the Complaints Committee should include a third party, such as an NGO or other organisation familiar with sexual harassment. This will ensure that complaints are not addressed based on any undue senior-level pressure or influence. The Complaints Committee is supposed to submit an annual report showing the complaints received and departmental actions.
- The rules further stipulate that the employees be allowed to raise issue of sexual harassment at worker's meetings and in other suitable forum and that the same will be discussed in Employer-Employee Meetings.
- The Vishaka guidelines conclude with a recommendation to the Central and State Governments to consider implementing appropriate measures, including legislation, to guarantee that the rules outlined in this order are also respected by private sector employers. Additionally, it was stressed that the Vishaka recommendations were in addition to the rights afforded to a victim under the Human Rights Act of 1993.
- The guidelines did not specify a deadline for filing a complaint due to the fact that it may require a great deal of courage to criticise a colleague or superior's actions or behaviour. However, once a complaint has been made, the guidelines suggested that the compliance mechanism should promote the timely resolution of complaints.

POST VISHAKA- ADMINISTRATIVE AND LEGISLATIVE REFORMS

In this regard, the Supreme Court heard *Apparel Export Promotion Council v. A.K. Chopra*²³, the first case of its kind following Vishaka. Here, the Supreme Court reaffirmed the law established in the Vishaka Judgment and supported the termination of a senior executive at the Delhi-based Apparel Export Promotion Council who had been found guilty of sexually harassing a junior female employee. The Supreme Court's decision here broadens the scope of what constitutes sexual harassment by holding that no physical contact need occur for there to be a violation of the law.

In addition, the Supreme Court directed State Governments to produce affidavits highlighting the actions they have taken to implement the Vishaka Guidelines throughout the country as part of its verdict in *Medha Kotwal Lele & Ors. V. Union of India & Ors*²⁴. unsatisfied, it demanded that States put in place adequate measures to guarantee the Vishaka Guidelines would be carried out as intended. The Supreme Court concluded by saying that those who felt wronged by the Guidelines could file complaints with the appropriate High Courts. The

²³ *Apparel Export Promotion Council v. A.K. Chopra*, AIR 1999 SC 625.

²⁴ *Medha Kotwal Lele & Ors. V. Union of India & Or* (2013) 1 SCC 297.

Supreme Court further ruled that the complaints committee established in the Vishaka decision would be treated as an inquiry authority and its report would be treated as an inquiry report under the Central Civil Rules of 1964.

In *Mukesh & Anr v. State for NCT of Delhi & Ors.*, the Nirbhaya case is another name for this one. Under the chairmanship of Justice J.S. Verma, former Chief Justice of India, a panel was formed to analyse the criminal laws and suggest necessary amendments to make the laws relating to sexual violence stricter and to increase the punishment in cases of extreme assault and brutality against women in criminal law. A month later, the committee published its report, which included numerous recommendations for revising the country's rape laws in order to make them harder and more stringent.

The POSH Law: Key Provisions

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 was the most significant development that occurred in the wake of the Vishaka judgement. This act was adopted as India's first law dealing with the protection of women from sexual harassment in the workplace in April of 2013. The following is a list of major features that are included in this act:

- The purpose of this Act was to ensure that every woman, regardless of her age or job status, has access to a safe and secure place of employment that is free from any and all types of harassment.
- This Act applied to both India's organised and unorganised sectors. The statute extended to all government bodies, private and public sector organisations, non-governmental organisations, commercial, vocational, educational, entertainment, industrial, and financial organisations, hospitals, and so on.
- The POSH Act broadly defines "employee" to include regular, temporary, ad hoc employees, individuals engaged on a daily wage basis, either directly or through an agent, contract labourers, co-workers, probationers, trainees, and apprentices, with or without the principal employer's knowledge, whether for remuneration or not, working voluntarily or otherwise, and whether the terms of employment are express or implied.
- The Act expanded the definition of sexual harassment to include "the presence or occurrence of circumstances of implied or explicit promise of preferential treatment in employment, threat of detrimental treatment in employment, threat about present or future employment, interference with work or creating an intimidating, offensive, or hostile work environment, or humiliating treatment likely to affect the woman employee's health or safety."
- While the Vishaka Guidelines only applied to the office setting, the POSH Act expanded the definition of "workplace" to include other locations where employees may be subject to sexual harassment. In accordance with the POSH Act, the term "workplace" covers not only the physical location of the employer's place of business but also any other location frequented by the employee in the course of their employment.
- The Act required that an Internal Complaints Committee (ICC) be set up in every office or branch of an organisation with 10 or more employees. This was done to give people a place to file complaints and make it easier for sexual harassment problems to be addressed easily.

- It also stated the establishment of a local complaints committee (LCC) at the district level by the government to investigate and redress complaints of sexual harassment from the unorganised sector or from establishments where the ICC has not been established because they have fewer than ten employees²⁵.

In addition to the aforementioned act, several provisions of the Indian Penal Code, 1860 were modified via the Criminal Law Amendment Act, 2013, to bring several offences under its purview. These offences include outraging the modesty of a woman, assaulting or using criminal force with the intent to disrobe, stalking, and voyeurism, thus making an exclusive provision to deal with the problem of sexual harassment.

SUGGESTIONS AND RECOMMENDATIONS

The following recommendations and suggestions will aid in reducing workplace sexual harassment incidents:

1. Each government and private sector department should set up and run legal awareness programmes that teach women employees about their rights and privileges.
2. Women should be given the most job opportunities and chances to move up. This will help them avoid getting emotionally stuck and keep them from worrying about the future.
3. Where appropriate, all organisations should train staff on sexual harassment and its legal consequences.
4. The responsible authority should hold sexual harassment seminars, workshops, and mock drills.
5. Every organisation, whether public or private, should have an internal complaints committee and grievance cells to keep an eye on cases of sexual harassment.

The highest priority should be social acceptance. Women should not be afraid to voice their issues and grievances. They must be courageous in order to speak for themselves. The public must be more engaged in awareness programmes and play a more active role in government.

CONCLUSION

India is making tremendous progress toward its developmental objectives, and an increasing number of women are entering the workforce. The defence of women's human rights is inextricably linked to the acknowledgement of the right to protection against sexual harassment. All of this is a step toward granting women freedom, opportunity equality, and the right to a job with dignity. A social issue that requires attention is sexual harassment at work. It is crucial to raise awareness among both employers and employees about the various types of sexual harassment that can occur at work, the preventative steps that can be taken, and the legal basis for doing so. In order to improve workplace sexual harassment best practises and to alert potential victims of sexual harassment so they can avoid it, dissemination and awareness-raising activities should be carried out on a regular basis and reviewed. Combating it can be aided by improving sexual harassment training programmes and offering paperwork or a manual on how to prevent it at work.

²⁵ *Id.* at 20.

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