Chapter-VI

Conclusions and Recommendations
CHAPTER – VI

CONCLUSIONS AND RECOMMENDATIONS

"Equality is a dynamic concept with many aspects and dimensions and it cannot be imprisoned within traditional and doctrinaire limits."

-Justice Bhagwati

6.1 CONCLUSIONS

Accent has been laid in this study to make an incisive socio-legal analysis of the dignity of women in India in its wider scope unexplored so far in the human rights perspective. No wonder, protective measures founded on lofty ideals remain idealistic philosophy, with remote chances of translating them in to reality, where gender equality is a mirage. No force or earth however potent it may be has any right to deprive or curtail women's human rights simply because of historical errors of men in the system. Women's rights cannot be offered as ransom at the altar of male domination especially at a time, when the feminist movements all the world over have crossed many milestones. Absence of tangible action against male chauvinism and perpetrators of atrocities on women enshrined in the laws of the land is nothing short of pious platitudes and verbal extravaganza. It is a pity that Indian women are still conditioned by hypnotic spell of cloistered virtue dictated by male dominated dictums of Indian culture, tradition and religion. This calls for radical transformation of women's mindset. The cobwebs of misconceptions relating to indignities must be removed even at the cost of radical changes in the law of the land only to protect the human rights of women and the inherent right to dignity.

Maneka Gandhi v. Union of India, AIR 1978 SC 597
"Though women do not numerically constitute a minority, they are beginning to acquire the features of a minority community on the basis of the three recognised dimensions of inequality: Class (economic situation), Status (social position), and Political power. From womb to tomb, woman has been dehumanised for centuries. To overcome the social evils like dowry, sati, child marriage, Devadasi, etc., and unforeseen incidents of life like divorce, widowhood, accidents, she realised the need for education and occupation which will help to keep up her self-respect."² At the conceptual level, feminists challenge human rights law for failing to recognize oppressive practices against women as human rights violations. Occurring both within the public and private spheres, violence against women is the most brutal manifestation of women's oppression. It violates a woman's right to bodily integrity and liberty; to be free from torture, inhuman, and degrading treatment, and in its most acute form, it violates a woman's right to life. As a reconceptualization of human rights has begun to take place, the agenda must be shifted towards the challenge of ensuring the effective enjoyment of these rights.

"The personality of one's sister cannot be warped to suit the masculine ethos nor shaped to confer pseudo-freedom, keeping subordination as an unwritten code of the suppressed tribe."³ "Though constituting half the population of the world and often euphemistically referred to as the 'Betterhalf of Man', women, in fact, had the worst deal at the hands of society, till very recently. They were physically and sexually abused and exploited; denied a say in the governance, denied equal wages and were always treated as an appendage of man. She was a sister, a wife, a mother and an unpaid worker in the household. When old, she was discarded and disregarded. When widowed, she was considered to be a fair

Hemalatha Devi, V. Dr., Women Maintaining Balance between work and home...Illusionary or Reality?! Krishna Iyer. V.R. Justice Human Right to be Woman, Women-March Towards Dignity, Social and Legal Perspectives( Ed). Kusum, Regency Publications, New Delhi 1993 p1
game for all." What is needed is nothing less than a revolution for gender equality. Development must be engendered. Societies cannot succeed while suppressing the talents of half their members. The damage done to womanhood for centuries at the cost of her life and liberty assumed serious dimensions as though there is no redemption for women in foreseeable future. The total body politic is totally incorrigible. There is pessimism when the alarming dimension of the problem is contemplated upon. This is the defeatist philosophy trying to perpetuate Sita-Sati syndrome forever. Justice Krishna Iyer epitomised the position of women's rights in succinct way that what is demanded is not charity nor grace nor legal aid to a weaker sex. The militant claim is the woman's right to be oneself, not a doll to please, nor an inmate of a workhouse. She has the human right to be a woman.

It is quite expedient that human rights of women must be held sacro sanct in letter and spirit. The precept and practice must go hand in hand. This is the urgent need of the hour. It is not high time, that there is immense need for recasting the definition of dignity of women in human rights perspective of gender parity. The scope of dignity of women must be expanded covering in its ambit the entire gamut of invisible and ubiquitously sensitive areas of violations besides visible and heinous atrocities against women. The verbal incendiaries invariably tantamount to physical assaults and therefore, call for overhauling the statutes, enactments, laws, implementation machinery, police, judicial and other related systems only to revamp the existing inertia and rickety executive syndrome. It is in this context the age old shackles of deprivation, infringement, abuse and concomitant evils relating to the dignity of women have been studied thread-bare in the Indian context, juxtaposing international movements which have gained momentum especially since women's long journey of liberation and equality and concluded that women's conditions have substantially been

changed. "Those societies which have given equal access to women and men in economic and political opportunities have progressed much faster than those which denied such access. Gender equality is a necessary condition for sound human development." If a right does not help a human being to remain human or if does not give him/her the right to live a life of dignity, it is not worthwhile. The question of women's dignity as a human right becomes important because in many cases women are forced to live in an environment not conducive to their dignity. The domestic, the community, the civic and political life are still to recognise woman as an equal independent human being.

Most of the incidents of crimes against women go unreported as Indian society in turn stigmatises the life of the victim especially in cases relating to sexual offences. Besides, laws only grant a legal remedy. Moreover, most of social legislations to protect women are no more than half-hearted efforts. Social legislation should not only bark but should be able to bite as well. The piece-meal protection provided under different legislations has failed to protect the dignity of women.

In spite of the significant development that took place in India by the enactment of the Protection of Human Rights Act, 1993, by the Parliament, the Act defined the 'human rights' to mean the rights relating to life, liberty, equality and dignity of the individual. This is a good piece of legislation but the efficacy of it seldom offers protection to women's rights for the reasons well known to legislators and the citizens. Things are mismanaged at every level by extraterritorial forces to protect their personal interests. Political interference at all levels of the process of the justice to the aggrieved renders the legislations ineffective.

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5 Human Development in South Asia 2000, Mahbub ul Haq Human Development Centre, OXFORD 2000 p. 132
6 Section 2(d), The Protection of Human Rights Act, 1993
The impact of culture, tradition, religion, language, patriarchy and commercial advertisements are responsible for the degradation of dignity of women in India. It is uncharitable and cruel to impose ever so many restrictions on the general conduct and behavioural pattern of Indian women by religious scriptures. Custom, religion, legislations are the sources of law. Most of the Indian laws are made on the basis of Dharmasastras, Sruthis and Smrithis. These laws are antithetical to women's development. Women's fundamental rights are violated owing to strict religious, social and cultural norms prescribed by the authors of Indian scriptures.

Ignorance of the law and especially, a lack of will among enforcement agencies obstruct the enforcement of many protective and promotional laws. Discriminatory and gender insensitive laws generate and reinforce inequalities, perpetuate the subordination of women in the family and society, and contribute towards creating an insecure environment for them. Lack of uniform civil code in which fundamental human rights take precedence over gender discriminatory religious customs remains a main obstacle to the achievement of women's equal rights. "Western culture superimposed certain other imprints resulting in various simultaneous processes, which are sometimes complementary, sometimes contradictory and destructive of each other".7 When India, the 'first jewel' to go out of the British Crown, became independent, one of the most remarkable changes brought about by this independence has been the emancipation of Indian women from their tradition-bound ethos.8

Social, religious norms prescribed for women by the Indian scriptures had reduced the status of women to subordinate position, robbing off their

human rights to be a human being on equal footing with men. Equality is denied in the name of social and religious sanctions where undue advantage is taken by vested interests by distorting the human values embodied in the Dharmasastras. All that was done in the name of code of conduct and righteous living, where women became scapegoats only to suffer untold miseries for no sin they have committed. Therefore, action in this regard is called for to streamline the entire laws of the land untouched and which have not reached the unfortunate womenfolk. Preponderance of traditional values on the laws cannot override the human rights, especially women's rights. Dignity of women is a major casualty, if revolutionary changes in the law are not brought about forthwith, to save women from the perennial rut of suppression and suffering.

The law works at various levels and through various agencies; much of the law is still not codified and in the name of religious freedom every antiquated anti-woman custom is preserved, because, still there is no uniform civil code. These inequalities are to be found in the law relating to marriage, divorce, inheritance, succession, custody, and guardianship and to maintenance. The cases of Mathura, Rameeza Bee, Khairunissa are just a few examples where the policemen on duty are acquitted of the sexual offences despite the overwhelming evidence against them. In rape trial the women's entire history is put on trial. If the woman is a woman of 'loose character' as coined by the society, she is presumed to have invited rape. Commenting on the offence of rape, it has been stated as a crime against the person of a woman but it is a crime against the society. It destroys the entire psychology of a woman and puts her into a deep emotional crisis. It is thus a crime against the basic human right and is violative of the victims' most cherished values of the fundamental rights, namely the right to life, contained in Article 21 of the Constitution. The recent (December 2002) proposal to amend provisions relating to character evidence under Indian Evidence Act, to fix the criminal liability on the accused even the character of
the raped is bad. It is a right step to give some solace and comfort to the rape victims, when it is passed in the legislature. The dignity of women should be the basis where the life worth should be taken into consideration and not her character as stated in the Act. Thus the rapists will not exploit the miserable plight of women.

While both sexes suffer due to being locked in their rigid and narrowly defined gender roles, it is the women who pay the price in a much more obvious way. Patriarchy constrains women in all facets of life. Control of women's reproductive abilities and sexuality is placed in men's hands. Patriarchy limits women's ownership and control of property and other economic resources, including the products of their own labour. Women's mobility is constrained, and their access to education and information hindered. Therefore, the exclusion of feminism from any sphere of gender is absurd. Feminism is an awareness of women's oppression and exploitation in society, at work and within the family and a conscious action by women and men to change this situation.

Hindu Succession Act, 1955 is in force today. Earlier several legislative measures were enacted changing the personal law of the Hindus such as The Hindu Removal of Disabilities to Inheritance Act of 1928, The Child Marriage Restraint Act, 1929, and The Hindu Law Inheritance Amendment Act 1929, Gains of Learning Act, 1930, The Hindu Women's Right to Property Act, 1937 etc., Property and inheritance laws are themselves highly gender discriminatory across India, yet ignorance and misapplication of these laws often mean that women do not even enjoy the minimal protection they afford. A significant proportion of women do not receive their due share of inheritance. Women do not have the legal right to make their own decision on how to use these assets and resources. Discriminatory property laws limit women's capacity to obtain credit and benefit from new opportunities for economic advancement by engaging in
self-employment. The customary laws modified by judicial decisions and colonial legislation place female heirs in a disadvantaged position.

Yet, like most social enactments, those that confer benefits on women in patriarchal societies are likely to remain ineffective. This is more so in societies with staggering levels of female illiteracy. In view of the limited assertion of equal right to property by women, it is necessary to understand that if equality exists only as a phenomenon outside the awareness and approval of majority of the people, it cannot be realized by a section of women socialised in traditions of inequality. In this context, it is also worth recalling the observations made by the Community Development Project, London, in its report “Lawyers, use of law and the courts are unlikely to be able to make dramatic changes in the relative position of the poor and the weak”. This is also true of women’s rights to property. But this is not to say they are useless, but only to emphasise, the need to social awareness and to educate people to change their attitudes towards the concept of gender equality.

The culture of patriarchy is deeply entrenched in the region and gender biases are held not only by men but also by women. Women are often convinced that the work they do for their family is their duty, and as such women do not expect any recognition, monetary or otherwise, while the work that men do is truly valuable, both socially and economically. Similarly many women do not participate in decision-making, believing it to be the realm of men. Attitude shifts in society as a whole are required to break out of this culture of patriarchy, and this is why the gender question is not just one about women, but about both women and men and how they interact. The overall picture is one of overlapping and complementary forms of exclusion, because the traditionalism of South Asian cultural and religious

practices are enshrined in legal codes, measures which discriminate against women are normalised in the legal sphere.

In India different caste groups especially the lower castes were distinguished as special groups from several angles of social significance. This kind of speciality was remarkably one of social isolation or segregations in nature by the upper castes. The history of Indian womanhood in the struggle for status maintenance has always shown evidence of rigorous path they witnessed, even though the conditions have changed considerably since independence. Constitutional guarantees and laws that prohibit caste discrimination do not seem to protect the low-caste and Dalit women from acts of cruelty and violence. The status of women among the lower castes is still extremely low.

Status is acquired but dignity is natural. The process of economic development in terms of empowerment can promote the status of women. This is not the end of the whole story. The actual problem of dignity begins at this point where living conditions alone do not ensure dignity. It is not only the responsibility of the State to ensure protection of the dignity of women but it is the concurrent responsibility of male members of the society to accept the principle of equity and equality and render justice to women and thereby promote their dignity. Willingness on the part of men extends equal treatment for women will help solve the problem. March towards dignity of women is not only the need of women, but also the legal responsibility of men, who rule the roost. It is not merely the poor or the illiterate who are the victims of gender discrimination. Women from all strata of society, the world over, experience bias in day-to-day life. An equitable society cannot be established without a drastic change in the present social attitudes. There is a grain of truth in the statement that "all battles begin in the mind and it is in the mind that the battle for the emancipation of woman is to be won. This is
to be fought both by men and women for a common cause through quiet and sustained work in which family should be the main focus.\textsuperscript{10}

Though the Constitution of India provides fundamental rights to their citizens to enable them to lead a good, dignified life, but, despite such provisions, there is exploitation, discrimination and violation of basic human rights. Supremacy of judiciary is one of the salient features of Indian federal structure. Predominance of legal spirit with its wide powers of interpretation is the saving grace of dignity of women. However, the court of law prevailing on the matters of judgements would help solve several intriguingly fishy problems relating to the miserable plight of women. Delayed process in judicial proceedings is also responsible for the dispensation of justice to women. The hope for justice to women lies in independent and unbiased judiciary.

Status of women can be promoted by empowerment in terms of socio-economic components of development models whereas; dignity is inherent and inalienable right of women, which can be derived only through 'rights approach to development'. This is in consonance with the recent trends of human rights in international perspectives. By and large soundness of wealth promotes economic status. This does not reflect the true picture of Indian women as it is evidently noted in every Indian family where affluent women even with huge dowry are not an exception to the aggressive masculine domination. She loses her dignity the moment she becomes the wife of greed based masculine hegemony and suffers from the agony of discrimination, deprivation, frustration and denial of freedom of thoughts and actions. Even in the midst of material plenty, many women live with harrowing feelings of psychological insecurity, and lack of personal status. The official \textit{Country Report for India} presented at the Fourth World

\textsuperscript{10} Krishna Kant, The Vice-President of India, 69th Annual session of the all India Women’s Conference, New Delhi
Conference on Women at Beijing in 1995 observed that the percentage of women among the extremely poor is disproportionately large, adding that intra-household inequalities can be significant, necessitating special attention for poor women.

'Rights approach' is a break through in this direction for emancipation of women from the rut of indignity. The crux of the problem is not to make rumpus over enactments and laws governing the women's dignity but serious concern to abolish lock, stock and barrel all the anti-social cultural, traditions, religious practices even at the prospect of deriving the displeasure of incorrigible conservatism, male chauvinism, patriarchal hegemony. This requires courage of conviction and bluntness of candour on the part of State as a law making and executive agency. The true aspirations of the people for general well-being can only be achieved by stringent and effective actions of the State authorities.

While examining the patriarchy located within the parameters of Indian feudalism of the smriti and post-smriti period, it is evident that despite the negative dictates, there were certain protective measures built into laws and customs, which granted women certain significant rights over property. While this right do not meet the modern concept of equality, they were governed by a notion of equity. The Hindu woman's rights over ornaments, valuables and movable and immovable property under a specific category called stridhana are indicative of this protectionist approach. These measures were meant to provide some respite to women who were outside the sphere of coparcenary rights bestowed upon a Hindu male. While examining the customary, traditional and cultural practices within a patriarchal social structure, discrimination against women is a foregone conclusion.
It is at this juncture there is immense need for radical steps to be taken up at individual, social, political, religious and State levels to implement the laws governing the status and dignity of women, even at the cost of resistance from vested interests. Caught between the traditional past and a future inspired by their own dreams and aspirations for Indian women, it is a tightrope walking. The laws are meant to protect the interests of women. In practice seldom women lodge complaints in the police stations for obvious reasons. The constant fear of ignoring her grievances and violations of her rights by the police, haunt women. It is no surprise women have great faith in the sanctity of the Courts of law, where she could submit her grievances at the seats of judgements. It is evident that the extra-judicial confession has no evidentiary value on account of custodial threats, torture, coercion and force etc., where as, judicial confession is a good piece of evidence free from apprehensions. Male dominated Indian police system and other protective agencies seldom redress women's suffering.

An earnest attempt is made in this chapter to analyse the dignity of women in human rights perspective in the light of the incessant struggle of women for emancipation. Dignity of women is not only augmentation of status, economic or otherwise but also encompasses the physical and psychological core feelings of minimal human worth, merit, self esteem, nobility, honour, freedom from fear and exploitation. It includes male-centered sadistic manifestations of psychopathological atrocities inflicted on women. Verbal incendiary wounds the finer sentiments of women consequent of broken families and many a time suicidal pact. At every turn of their life women are confronted with disillusionment. Yet they survive, with the help of their basic resilience and the strength of the ever-battling, ever-inviting spirit they have within. Destiny may turn them into pillars of salt like Lot’s wife, or into stone like Ahalya but, like the Phoenix, they rise from the ashes.
The following are the findings of the study:

a) The study reveals that the women's rights are not only constrained by a uniform set of patriarchal norms but are also shaped and moulded by several social, economic and political factors.

b) The institutional character of patriarchal and joint family systems provided little scope for the self-improvement of women.

c) Culture, religion, tradition and social restrictions suppressed the self-development of women.

d) Historical reasons such as constant invasion and foreign rule in India and imposition of colonial laws retarded women's progress and secluded them from the outside world.

e) The contemporaneous juristic orientations, legislative projectiles and societal attitudes apparently accord wide spectrum of immunities, privileges and rights to women. But the gulf between the principles and pragmatism has driven Indian women to inferior status.

f) The existing legislations are skin-deep but not soul-deep and therefore women are ill-treated, tortured at home, in streets, places of worship, work place, in police custody and the like.

g) Inspite of continuing resurgence of feminism and heightened awareness of the task of socio-economic emancipation of women, malefic deficiencies and distortions in the policy making and programme implementations kept Indian women in impoverishment of body, mind and soul and in continued suppression, subordination and super-ordination by men.

h) Indian society and Governments are male-dominated giving little scope for women's empowerment.

i) Lack of education, ignorance, deep-rooted false notions, superstitions, emotional and economic dependence and a
tendency to promote male dominance make women submissive and slavish.

j) Fear of reporting on the grounds of personal safety and security is a great hindrance to ventilate her suppressed grievances.

k) Restricted judicial powers and interpretation is a limiting factor in promoting dignity of women.

l) Red-tapism, favouritism, nepotism at all the levels of hierarchy resulted in delayed redressal and if not denial of justice.

m) Institutional and attitudinal impediments continue to defy woman's human worth and dignity and mock at the credibility of rule of law. Inherently, patriarchal societal system, which has been approved by all the major religions, was a dominant hindrance for gender discrimination.

n) The executive and other social agencies are not effectively enforced the laws such relating to dowry, rape, obscenity etc, with the true and real spirit.

o) The traditional bottlenecks in the implementation of the laws and the incorrigible attitudes are significant factors, which have been eroding the dignity of women.

6.2 RECOMMENDATIONS

The Researcher in this chapter has made certain possible and plausible recommendations in the spheres of legislature, executive and judiciary in addition to the general recommendations for promotion and protection of the dignity of women in India.

The following are the recommendations for the legislative reforms:

- Laws must be enacted, banning superstitions, unlawful traditions and cultural practices, which are affecting the human rights of women.
Registration of marriages should be made mandatory by foolproof procedures so as to avoid bigamous marriages and ensure the rights and entitlements of women and children.

Concurrent responsibility of both men and women must be made imperative through legislations, as women cannot protect their dignity on their own.

Parliament should enact a legislation so as to ensure equal inheritance and distribution of property.

Legislation must be made which distinctly confers property rights on women on spousal property on dissolution of marriage.

Women in unorganised sectors must be brought within the purview of human rights law.

Women police must go to victims wherever victims hesitate to register their protest and offer mobile redressal service, as this is a success story in Malaysia, and Singapore.

Women Scrutiny Committee must be constituted by legislation so as to make the laws more stringent than before and to tighten the scrutiny, censor of vulgarity, obscenity in songs, dialogue, cinema, television, commercial advertisements and other related print and electronic media.

Women Rights Review Committee (WRRC) must be instituted by legislation to review periodically the working of safeguards to women in criminal law, Constitutional and other legislations to find out lacunae, inadequacies or shortcomings in legislations and their implementations.

Eternal vigilance is *sine qua non* on the part of legislative bodies against the baneful effects of violence against women.

Legislations must prescribe deterrent punishments against the offenders of women's dignity without succumbing to political influences.
A uniform civil code will help the cause of national integration by removing different personal laws, which have conflicting ideologies.

The Parliament of India must enact a law conferring 50% of reservation for women in legislative, executive and judicial establishments as against the present proposal of 33%, which is ridiculous when women constitute 50% of the total population.

The following are the recommendations for the executive reforms:

- The Executive machinery must implement the true intentions of the legislations without any fear or favour of top brass of ruling establishment and anti-women elements of the society. This requires courage of conviction and bluntness of candour dictated by equity, justice and good conscience.
- Women Police Stations must be established at all mandal (small part of a district) levels.
- The executives must be trained rigorously to imbibe the culture of fair and free execution of laws.
- Suo moto executive action should be initiated to sue the violators of women’s dignity.
- Eve teasing and sexual harassment at workplace must be taken serious note of and executive authorities concerned must rush up to the succour of the victims rather waiting for the victims delayed reporting and non-reporting.
- Failure on the part of executive machinery like ‘police excesses’ must be viewed very seriously and it should be made a cognizable offence with deterrent punishments.

The following are the recommendations for the judicial reforms:
Wider and liberal judicial interpretation of right to dignity of women in human rights perspective is essential to interpret the laws to eradicate gender inequality.

The number of family courts must be increased and strengthened. A family court in every *mandal* head quarter is recommended on the grounds of exponential rate of growth of gender-crime.

'Women's Rights Tribunals' (WRT) as protective agencies must be constituted on three-tier basis. ‘District Women’s Rights Tribunal’ (DWRT) at District level, ‘State Women’s Rights Tribunal’ (SWRT) at State level and 'National Women's Rights Tribunal' (NWRT) at National level are the three planks of tribunals exclusively meant for safeguarding sensitive issues of women.

Particular care must be taken to appoint independent, impartial, humane women judges, members of *juris corpus* as custodians justice to women through these tribunals and family courts.

Women’s Dignity Forums (WDFs) also as promotional agencies must be instituted at schools, colleges, universities, NGOs and *mahila mandals* (women associations) that serve as a platform to promote the dignity of women. It is easy to sue the offenders through such institutionalised mechanism.

Criminal justice system should be strengthened to tackle the atrocities against women in the custody.

Legal machinery should shed its traditional role of courtroom-judgements and assume increasing social responsibility and social engineering to deal deftly with the issues relating to the dignity of women.

Special Courts of Domestic violence must be instituted to handle atrocities against women.

Thorough revision must be made to enhance the payment of compensation to the victims of atrocities, violence and indignities along with imprisonment to the violator.
Violence against women must be interpreted in human rights perspective besides legal and social perspective.

Affecting the dignity of women must be treated as gender crime and rigorous punishments must be imposed.

Offences against dignity of women must be brought within the purview of Public Interest Litigation (PIL). Any public-spirited person or institution should be taken for granted as writs in view of hopeless and helpless state of women who cannot by themselves register their protest and file cases before the court of law.

A comprehensive legislation should be made to protect the dignity of women and include the unrecognised rights of women.

In addition to the above, the following are the general recommendations:

- Female literacy and girl child education must be mandatory. Female literacy also should be made a fundamental right.
- Human Rights Education must be incorporated in the curriculum to enable young minds to imbibe the spirit of equality, fraternity, brotherhood, dignity of life and living as education is a potent force to bring about any social and economic change.
- Print and electronic media must be brought within the purview of offences under the law of dignity. Obscenity cannot be displayed in any form in the name of freedom of press taking shelter under Article 19(1)(a) of Indian Constitution.
- Obscenity on Internet must be checked under strict vigilance to avoid the current trends of pornography relating to sex perversions.
- Attitudinal changes must be brought about by constant efforts like conducting seminars, workshops, and symposia on a mass scale. Moral instruction based on equality and dignity of women must be inculcated in the minds of masses through theatrical arts.
- Women should have access to productive resources such as land buildings, credit, skill and vocational training
- Special incentives should be given to entrepreneurs who employ more women in their establishments
- Women must be mobilised from unlawful traditional sectors to more congenial current trends of productive centres to bring structural changes from beasts of burden to angels of freedom and dignity.
- The State must undertake the process of sensitisation of men towards women and girl child. The dangerous effects of amniocentesis and female foeticide must be inculcated through administrative machinery right from zilla parishad (district) level to grass root levels of village panchayat (administration).
- NGOs, Mahila mandals (women organisations) must be encouraged by granting liberal financial support and formal training so as to carry the sacred message of equality and dignity of women to build a brave new world of perfect harmony where sense of dignity centered life is fostered.

High degree of judicial super-activism is the need of the hour and no other protective measure would help solve the cancerous malady of gender discrimination. The inadequacies can be made good only when judicial activism percolates deeper in to the vortex of gender violence to expand the ambit of dignity especially in the context of emerging negative trends with all the concomitant evils of commoditification of women at the cost of the very life and dignity. The true intentions of legislature must be interpreted in human rights perspective by the judiciary because legislative bodies are composed of heterogeneous group representations basing on vote banks rather than human rights. This structural change will go a long way in bringing about phenomenal transformation in the lives of women. Life of women bereft of dignity is a human graveyard on earth. Dignity is the desideratum in the social fabric. Dignity of the mothers, daughters and sisters must be achieved at any cost only to build a just and equitable
society brick by brick. Grim determination is half the battle won, stern action is need of the hour, and this is a veritable and protracted battle for the total victory on offences of women's dignity. Women in India have a tryst with their destiny and hold their head high without fear and walk with dignity even at midnight into that Heaven of Freedom for which they have been desperately struggling.