

WOMEN'S SAFETY LAWS IN INDIA: CONSTITUTIONAL PERSPECTIVES, ENFORCEMENT CHALLENGES AND POLICY REFORMS

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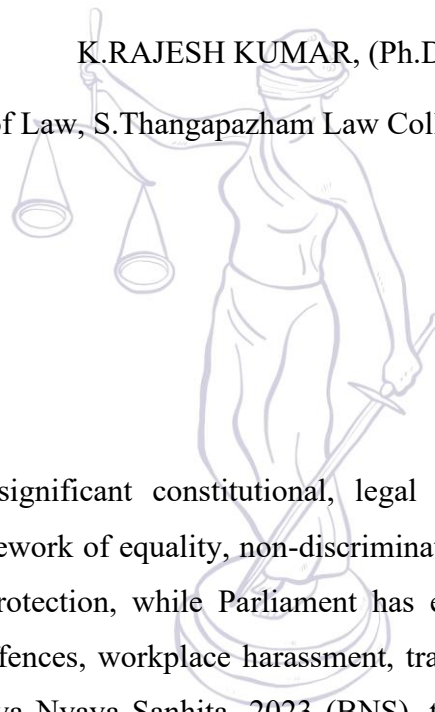
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1. Abstract

Women's safety is a significant constitutional, legal and social concern in India. The Constitution provides a framework of equality, non-discrimination, dignity, personal liberty, access to justice and affirmative protection, while Parliament has enacted specialised laws addressing domestic violence, sexual offences, workplace harassment, trafficking and other forms of gender-based violence. The Bharatiya Nyaya Sanhita, 2023 (BNS), together with the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS), has altered the contemporary criminal-law framework governing offences, investigation and trial procedures.

This article examines women's safety through constitutional protection, statutory safeguards and institutional enforcement. It analyses Articles 14, 15, 21, 39A, 42 and 51A(e), and considers how access to legal aid, survivor dignity, privacy, reproductive autonomy and gender-sensitive adjudication shape the meaning of safety. It also examines under-reporting, delays, institutional insensitivity, inadequate victim support and uneven implementation. Recent judicial developments concerning sexual violence, victim dignity, reproductive autonomy and the R.G. Kar incident demonstrate that women's safety requires more than formal legislation. The article concludes that

effective protection depends upon survivor-centred policing, speedy and fair procedures, accessible legal aid, institutional accountability, gender-sensitive adjudication and sustained policy reform.

Keywords: *Women's safety; constitutional rights; Article 21; Article 39A; gender-based violence; BNSS, 2023; BNS, 2023; workplace harassment; domestic violence; access to justice; legal aid.*

2. Introduction

Women's safety is closely connected with the constitutional promise of equality, dignity and personal liberty. Article 14 guarantees equality before the law and equal protection of the laws; Article 15(1) prohibits discrimination on grounds including sex; and Article 21 protects life and personal liberty. Article 15(3) permits the State to make special provisions for women and children. Together, these provisions establish that formal equality may be supplemented by protective measures where structural disadvantage affects women's enjoyment of rights.

Access to justice is also a constitutional concern. Article 39A directs the State to secure equal justice and provide free legal aid so that opportunities for securing justice are not denied because of economic or other disabilities. Article 42 concerns just and humane conditions of work and maternity relief, while Article 51A(e) calls upon citizens to renounce practices derogatory to the dignity of women. Article 39A is especially important for women facing economic dependence, social stigma, domestic violence or institutional barriers because legal rights have little practical value if remedies remain inaccessible.

India's statutory framework includes the Protection of Women from Domestic Violence Act, 2005; the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013; and the Bharatiya Nyaya Sanhita, 2023, which consolidates criminal offences including offences relating to sexual violence, assault, harassment, cruelty and trafficking.

Government data indicate that institutional mechanisms funded through the Nirbhaya Fund have expanded in recent years alongside this statutory framework: by March 2025, over 14,600 Women Help Desks had been set up in police stations nationally, cyber-forensic training labs were functioning in thirty-three States and Union Territories, and the Emergency Response Support System (112) together with the Women Helpline (181) had together handled several crore calls for assistance. Such infrastructure represents an institutional complement to the statutory scheme

described above, although its reach and effectiveness continue to vary across States and Union Territories.¹

The procedural framework has also changed. The Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS) replaced the Code of Criminal Procedure, 1973 and came into force on 1 July 2024. Its provisions governing information relating to cognizable offences, investigation, statements, medical examination and trial procedure are therefore directly relevant to contemporary discussions of women's access to criminal justice. Procedural safeguards must be understood not merely as technical rules but as mechanisms for reducing secondary victimisation and ensuring timely and fair investigation and trial.

Despite this extensive framework, women continue to experience domestic violence, sexual violence, harassment, stalking, cyber abuse, trafficking and other forms of insecurity. The central research problem is therefore not simply whether protective laws exist, but whether women can invoke them effectively, safely and without discrimination. This article evaluates the gap between legal entitlement and practical enforcement and proposes reforms aimed at strengthening the justice chain—from reporting and investigation to trial, compensation, rehabilitation and institutional accountability.

3. Review of Literature

Existing legal literature on women's safety broadly emphasises the constitutionalisation of gender justice. Early constitutional scholarship focused on Articles 14, 15 and 21 and the Supreme Court's expansion of dignity and personal liberty. *Vishaka v State of Rajasthan* is particularly significant because the Supreme Court treated workplace sexual harassment as a violation of fundamental rights and relied upon international norms in the absence of dedicated legislation.

More recent scholarship has moved beyond formal legal protection to examine the social and institutional conditions that shape women's exposure to violence. Manna, Singh, Barik and colleagues' 2024 study using National Family Health Survey-5 data examined intimate partner violence among Indian women, demonstrating the continuing significance of violence within intimate relationships. This finding is corroborated by national survey data: according to the

¹ Press Information Bureau, Government of India (Ministry of Women and Child Development), 'Government Implements Schemes under Nirbhaya Fund to Enhance Women's Safety and Security, Utilizes Nearly 76% of Nirbhaya Fund' (PIB Delhi, 12 March 2025) <<https://www.pib.gov.in/PressReleasePage.aspx?PRID=2110881>> accessed 13 August 2026.

National Family Health Survey-5 (2019–21), 29.3% of ever-married women aged 18–49 reported having experienced physical or sexual violence by a spouse, indicating that intimate partner violence remains a pervasive rather than a marginal dimension of women's insecurity in India.² A 2024 BMC Public Health study similarly examined risk assessment for severe domestic violence and related homicides by partners and in-laws, highlighting the need for early identification and intervention.

Recent interdisciplinary research also examines spatial and structural dimensions of women's safety. Pooja, Guddattu and Rao (2024) used district-level small-area estimation to study crime against women across India, drawing attention to geographical variation and localised prevention strategies. Research published in *Frontiers in Psychology* in 2024 examined Indian women's experiences of domestic violence and control in relation to patriarchal beliefs, reinforcing the argument that legal reform must be accompanied by changes in social attitudes and support systems.

The literature increasingly recognises digital and technology-facilitated gender-based abuse. Research on online harassment identifies threats, stalking, sexualised abuse and non-consensual sharing of intimate material as harms that can restrict women's participation in public and digital spaces. A 2023 nationwide survey of urban households similarly found that a substantial proportion of women internet users in India reported facing online abuse or trolling, with respondents calling for time-bound platform accountability and a dedicated cyber-grievance mechanism for women, suggesting that public concern over digital safety extends well beyond isolated incidents.³ This literature is relevant because the boundary between physical and digital violence is increasingly blurred; legal and institutional responses therefore require technological capacity as well as conventional policing and legal remedies.

The literature nevertheless leaves room for an integrated doctrinal analysis combining constitutional rights, the new BNS-BNSS framework, statutory protections, access to legal aid under Article 39A, and contemporary judicial responses to sexual violence. The present study addresses this gap by treating women's safety as a continuum of rights rather than as a collection of isolated offences.

² Priyanka Kumari, Rahul Kumar and Rangasamy Nagarajan, 'Examining Intimate Partner Violence as a Barrier to Childhood Immunization in India with Focus on Maternal and Child Factors' (2025) 15 *Scientific Reports* 35248, citing International Institute for Population Sciences and ICF, National Family Health Survey (NFHS-5) 2019–21: India Fact Sheet (IIPS 2021).

³ LocalCircles, 'How Are Women Using the Internet in India and What Should Be Done to Make It a Safer Space' (LocalCircles, 7 March 2023) <<https://www.localcircles.com/a/press/page/indian-women-internet-usage-survey>> accessed 13 August 2026.

4. Objectives of the Study

1. To examine the constitutional provisions relating to women's safety and gender equality in India.
2. To analyse Articles 14, 15, 21, 39A, 42 and 51A(e) in relation to women's access to justice, dignity and protection.
3. To study major statutory protections against domestic violence, workplace sexual harassment and gender-based criminal offences.
4. To examine the role of the BNS, 2023 and BNSS, 2023 in contemporary investigation and trial procedures.
5. To analyse important judicial decisions concerning dignity, sexual violence, privacy, reproductive autonomy and gender-sensitive adjudication.
6. To identify institutional and enforcement challenges that limit the effectiveness of women's safety laws.
7. To suggest legal, administrative and policy reforms for strengthening survivor-centred justice.

5. Research Methodology and Database Used

The study adopts a doctrinal and qualitative legal research methodology. It relies principally on primary legal materials—constitutional provisions, statutes, judicial decisions and official crime statistics—and supplements these with recent scholarly literature and interdisciplinary research.

The principal sources include the Constitution of India; Bharatiya Nyaya Sanhita, 2023; Bharatiya Nagarik Suraksha Sanhita, 2023; Protection of Women from Domestic Violence Act, 2005; Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013; National Crime Records Bureau's Crime in India 2023; Supreme Court judgments; government materials; and recent journal literature on gender-based violence.

The study is primarily analytical rather than empirical. It does not claim to measure unreported violence directly, and registered crime statistics are treated as indicators of recorded cases rather than complete measures of prevalence. Reporting rates, policing practices and institutional access can affect official figures.

6. Research Discussion

The legal framework for women's safety is extensive, but its effectiveness depends upon how constitutional rights, substantive criminal law, procedural safeguards and institutional remedies operate together. The following discussion examines six substantive issues.

6.1 Constitutional Foundations: Equality, Dignity and Access to Justice

Articles 14 and 15 provide the constitutional foundation for gender equality, while Article 21 has been interpreted to protect dignity, autonomy and conditions necessary for meaningful life. Women's safety cannot therefore be reduced to protection from physical injury; it includes the ability to live and work without sexual intimidation, coercion and degrading treatment.⁴

In *Vishaka v State of Rajasthan*, the Supreme Court recognised workplace sexual harassment as inconsistent with fundamental rights to equality, life and the freedom to practise a profession. The Court formulated binding guidelines until Parliament enacted legislation. The decision illustrates how constitutional adjudication can respond to structural forms of gender-based harm.⁵

A constitutional approach also requires measures sensitive to intersectional disadvantage. Women facing poverty, disability, geographic isolation, displacement or lack of digital access may experience additional barriers to reporting and remedy. Substantive equality therefore supports targeted institutional measures consistent with constitutional rights and due process.

Structural barriers are magnified for further marginalised groups. A widely cited inquiry into sexual violence cases involving women and girls with disabilities in India found that survivors faced compounding obstacles, including police reluctance to register complaints, limited availability of interpreters or special educators during investigation, and inconsistent access to victim compensation, notwithstanding statutory provisions intended to assist them. Such findings reinforce that formal constitutional equality must be accompanied by accessible, disability-sensitive procedures if intersectional disadvantage is to be genuinely addressed.⁶

⁴ Constitution of India, arts 14, 15(1), 15(3) and 21.

⁵ *Vishaka v State of Rajasthan*, (1997) 6 SCC 241 [1997 INSC 604].

⁶ Human Rights Watch, 'Invisible Victims of Sexual Violence: Access to Justice for Women and Girls with Disabilities in India' (HRW, 3 April 2018), summarised in 'Women, Girls with Disabilities Who Survive Sexual Violence Face More Barriers to Get Justice: Study' Scroll.in (New Delhi, 3 April 2018) <<https://scroll.in/latest/874363/women-girls-with-disabilities-who-survive-sexual-violence-face-more-barriers-to-get-justice-study>> accessed 13 August 2026.

6.2 Dignity, Sexual Violence and Survivor-Centred Justice

The Supreme Court has repeatedly emphasised that sexual violence attacks bodily integrity, dignity and personal autonomy. In *Nipun Saxena v Union of India*, the Court addressed protection of the identity and privacy of rape and sexual-offence survivors and stressed sensitive treatment. The judgment is important because secondary exposure and public disclosure can compound the harm suffered by survivors.⁷

In *Aparna Bhat v State of Madhya Pradesh*, the Supreme Court rejected bail conditions that relied upon gender stereotypes and required an accused in a sexual-offence case to engage in a symbolic *Raksha Bandhan* interaction with the complainant. The Court directed that judicial orders should not reinforce patriarchal stereotypes or trivialise sexual violence and called for gender-sensitisation of judges, prosecutors and other legal actors.⁸

In *Re: Alleged Rape and Murder Incident of a Trainee Doctor in R.G. Kar Medical College and Hospital, Kolkata and Related Issues* (2024) further demonstrates the constitutional importance of institutional safety. The Supreme Court treated the alleged sexual violence and murder of a healthcare professional as a matter requiring urgent constitutional and institutional response, including attention to the safety of women working in medical institutions.⁹

Subsequent proceedings in the criminal trial arising from this incident illustrate both the possibilities and the limits of survivor-centred justice. In January 2025, a Sealdah court convicted the accused of rape and murder under the BNS and sentenced him to life imprisonment together with a fine, declining to impose the death penalty on the ground that the case did not meet the 'rarest of rare' threshold; the Calcutta High Court subsequently dismissed challenges to the conviction, while an appeal by the investigating agency for enhancement of sentence remained pending. The episode demonstrates that even a case attracting sustained national and constitutional attention required several months to reach a trial-court verdict, underlining the continuing importance of survivor-sensitive yet expeditious criminal process.¹⁰

⁷ *Nipun Saxena v Union of India*, (2019) 2 SCC 703 [2018 INSC 1192].

⁸ *Aparna Bhat v State of Madhya Pradesh*, (2021) 18 SCC 191 [2021 INSC 192].

⁹ *In Re: Alleged Rape and Murder Incident of a Trainee Doctor in R.G. Kar Medical College and Hospital, Kolkata and Related Issues*, 2024 INSC 613.

¹⁰ 'Kolkata Court Sentences Sanjay Roy to Life Imprisonment in RG Kar Rape & Murder Case' (SCC Online Blog, 20 January 2025) <<https://www.scconline.com/blog/post/2025/01/20/kolkata-court-sentences-sanjay-roy-life-imprisonment-rg-kar-rape-murder-case/>> accessed 13 August 2026; 'Calcutta HC Dismisses Bengal Govt's Plea, Upholds Life Term for Sanjay Roy in RG Kar Case' (All India Radio News, 7 February 2025) <<https://www.newsonair.gov.in/calcutta-hc-dismisses-bengal-govts-plea-upholds-life-term-for-sanjay-roy-in-rg-kar-case>> accessed 13 August 2026.

These decisions support a survivor-centred model in which dignity is protected at every stage: reporting, medical examination, investigation, media coverage, bail, trial and post-trial rehabilitation. The objective is not to dilute the rights of the accused, but to ensure that fair procedure does not become an additional source of humiliation or intimidation.

6.3 Investigation and Trial Procedures under the BNSS, 2023

The BNSS, 2023 replaced the Code of Criminal Procedure, 1973 from 1 July 2024. For women reporting cognizable offences, procedural safeguards depend on prompt registration, competent investigation, appropriate medical and forensic processes, preservation of evidence and timely completion of proceedings.

The Supreme Court's jurisprudence on registration of information and fair investigation reinforces that access to the criminal process cannot depend upon informal discretion at the police station. In *Lalita Kumari v Government of Uttar Pradesh*, the Court held that registration of an FIR is mandatory where information discloses a cognizable offence, subject to the limited framework recognised in the judgment.

For women survivors, delay can have distinctive consequences. Evidence may deteriorate, digital material may be deleted, witnesses may become unavailable, and the survivor may face pressure to withdraw. The scale of pendency in specialised courts illustrates this risk: as of 2025, 775 Fast Track Special Courts, including 398 exclusive POCSO courts, were functioning across the country, yet approximately 2.45 lakh rape and POCSO cases remained pending at the end of that year despite the disposal of over 66,000 cases during the year, indicating that specialised infrastructure alone has not eliminated delay.¹¹ The BNSS should therefore be implemented with survivor-sensitive standard operating procedures, trained investigators, forensic capacity and effective supervision. Speed, however, must not come at the cost of accuracy, fair hearing or the rights of the accused.¹²

Trial courts should minimise unnecessary adjournments and avoid questioning that relies on stereotypes about dress, sexual history, marital status or expected behaviour. Procedural fairness must remain compatible with dignity, privacy and statutory protections.

¹¹ '775 Fast Track Special Courts for Rape, POCSO Disposed 66,500 Cases in 2025: Arjun Ram Meghwal' (Press Trust of India, 24 July 2025) <<https://www.prokerala.com/news/articles/a1791961.html>> accessed 13 August 2026.

¹² *Lalita Kumari v Government of Uttar Pradesh*, (2014) 2 SCC 1 [2013 INSC 748].

6.4 Domestic Violence, Workplace Safety and Institutional Accountability

The Protection of Women from Domestic Violence Act, 2005 recognises a broad range of domestic violence and provides civil remedies such as protection orders, residence-related relief and monetary relief. Its effectiveness depends upon accessible Protection Officers, service providers, police assistance, shelters, medical facilities and courts.¹³

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 gives statutory form to the principles developed in Vishaka and requires institutional mechanisms for prevention and redressal. Compliance should not be reduced to creation of a committee; employers must ensure awareness, accessibility, confidentiality, timely inquiry and protection against retaliation.

Independent surveys suggest that formal compliance with the 2013 Act remains inconsistent in practice. A 2024 survey of senior human-resources professionals found that 59% of companies had not constituted a legally compliant Internal Committee, while a review of a sample of listed companies found that a large majority reported zero sexual-harassment complaints in the relevant financial year, a pattern more consistent with under-reporting and weak grievance redressal than with a genuine absence of workplace harassment.¹⁴

Institutional accountability is particularly important where the alleged offender is a person in authority. Universities, hospitals, workplaces, police organisations and public institutions require clear reporting channels and credible mechanisms for addressing complaints. The R.G. Kar litigation illustrates why institutional safety cannot be treated as an afterthought: women's right to work with dignity requires safe infrastructure, secure reporting mechanisms and accountability.

A coordinated response is necessary. Police, legal services authorities, health institutions, One Stop Centres, employers and courts should be able to refer survivors across services without requiring them repeatedly to narrate traumatic events. Integrated systems reduce fragmentation and can improve safety and access to justice.¹⁵

Independent field investigations, however, indicate that the coverage and functioning of One Stop Centres fall short of official claims. A 2024 investigation found that although the government reported hundreds of operational centres, many listed contact numbers were unreachable, switched

¹³ Protection of Women from Domestic Violence Act, 2005.

¹⁴ 'Why POSH Complaints in India Are Still Under-Reported' (The Peoples Board, 21 April 2026) <<https://www.thepeoplesboard.com/hr-compliance/why-posh-complaints-india-under-reported-data/>> accessed 13 August 2026.

¹⁵ Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

off, or redirected to unrelated numbers, raising doubts about a survivor's practical ability to access these centres in an emergency. Closing this gap between approved infrastructure and functioning services is therefore as important as expanding the number of centres on paper.¹⁶

6.5 Under-Reporting, Social Stigma and Access to Legal Aid

The NCRB's Crime in India 2023 (Volume I: Statistics) is the specific statistical report used in this study. Table 3A.1 records 4,48,211 registered cases of crimes against women in 2023, an increase of 0.7% over 2022 (4,45,256 cases). The figure represents recorded cases and should not be treated as a complete measure of all violence experienced by women. The same report records a national chargesheeting rate of 77.6% for these cases, but a materially lower proportion result in conviction: state-level data for 2023, for example, show that nearly 92% of crime-against-women cases disposed of by courts in Karnataka ended in acquittal, with police officials and activists attributing this partly to weak evidence collection and inconsistent prosecutorial follow-through. Such figures indicate that registration and chargesheeting are necessary but not sufficient measures of an effective response to crimes against women.¹⁷

Under-reporting may arise from fear of retaliation, economic dependence, family pressure, stigma, distrust of institutions, concern about reputation and lack of knowledge of available remedies. In rural and marginalised communities, geographical distance from police stations, courts and legal-service institutions may further increase the cost of pursuing a complaint. This pattern is consistent with national survey evidence: NFHS-5 data indicate that 77% of women who had experienced spousal violence never sought help or disclosed the abuse to anyone, and that those who did seek help turned overwhelmingly to their own family rather than to police or legal-aid institutions, suggesting that formal remedies remain a last resort rather than a first response for most survivors.^{18,19}

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¹⁶ 'Probing the Reality of India's One Stop Centres for Women in Distress' (The Probe, 28 April 2024) <<https://theprobe.in/public-interest/probing-the-reality-of-indias-one-stop-centres-for-women-in-distress-4550451>> accessed 13 August 2026.

¹⁷ 'India Records Close 4.5 Lakh Crimes against Women in 2023: NCRB Report' (The Week, 30 September 2025) <<https://www.theweek.in/wire-updates/national/2025/09/30/del31-ncrb-women.html>> accessed 13 August 2026; 'Karnataka Sees Surge in Crimes against Women but 92% Cases End in Acquittal: NCRB' (Deccan Herald, 30 September 2025) <<https://www.deccanherald.com/india/karnataka/karnataka-sees-surge-in-crimes-against-women-but-92-case-end-in-acquittal-ncrb-3748682>> accessed 13 August 2026.

¹⁸ International Institute for Population Sciences and ICF, National Family Health Survey (NFHS-5) 2019–21: India Fact Sheet (IIPS 2021), as cited in Kumari, Kumar and Nagarajan (n 2).

¹⁹ National Crime Records Bureau, Crime in India 2023, Volume I: Statistics (Ministry of Home Affairs, Government of India, published 29 September 2025), Chapter 3A: Crime Against Women (States/UTs), Table 3A.1 (4,48,211 cases in 2023).

Article 39A provides the constitutional basis for responding to these barriers through legal aid. The Supreme Court has recognised that meaningful access to justice requires more than formal availability of courts. In sexual-violence cases, legal assistance can intersect with compensation, rehabilitation and counselling. The National Legal Services Authority's victim-compensation framework reflects this broader understanding of justice.

Legal-awareness programmes should explain practical routes to assistance: where a complaint can be made, how legal aid can be sought, how protective orders work, what workplace complaint mechanisms are available, and how compensation and rehabilitation can be pursued. Awareness should be delivered in local languages and through schools, colleges, workplaces, community organisations and digital platforms.²⁰

6.6 Emerging Forms of Gender-Based Violence and Policy Reform

Women's safety policy must respond to forms of abuse that cross physical and digital spaces. Cyberstalking, threats, impersonation, non-consensual sharing of intimate images, technology-facilitated surveillance and coordinated online abuse can restrict women's participation in education, employment and public life. Recent interdisciplinary research on online gendered abuse highlights the need for better detection, reporting and platform-level responses.

This concern is borne out by official crime statistics: NCRB data for 2023 recorded 86,420 cybercrime cases nationally, an increase of over 31% from 2022, with the national cybercrime rate rising from 4.8 to 6.2 cases per lakh population and fraud-related offences accounting for the largest share of cases. Although not all cybercrime is directed specifically at women, the scale and pace of this increase reinforces the case for building dedicated digital-forensic and platform-liaison capacity within the women's safety framework described above.²¹

Policy reform should combine legal enforcement with prevention. Police units require digital-forensics capacity; prosecutors require training in electronic evidence; workplaces and educational institutions need clear digital-safety protocols; and survivors need accessible mechanisms for rapid removal or preservation of harmful content where legally permitted.

The Supreme Court's decision in *X v Principal Secretary, Health and Family Welfare Department, Government of NCT of Delhi* reaffirmed reproductive autonomy as part of

²⁰ Constitution of India, art 39A; Legal Services Authorities Act, 1987.

²¹ 'NCRB 2023 Report: Rise in Crimes against Women, Cybercrime, Farmer Suicides' (National Herald India, 30 September 2025) <<https://www.nationalheraldindia.com/national/ncrb-2023-report-rise-in-crimes-against-women-cybercrime-farmer-suicides>> accessed 13 August 2026.

constitutional liberty and dignity. Although reproductive rights are distinct from criminal-law protection, the decision is relevant because it demonstrates that bodily autonomy is a central component of constitutional personhood.

Future policy should adopt a life-cycle and rights-based approach: prevention of violence; safe reporting; effective investigation; fair trial; legal aid; medical and psychological care; compensation; rehabilitation; and measures against repeat victimisation. This approach can transform women's safety from a reactive law-enforcement objective into a sustained constitutional policy.²²

7. Results / Findings

1. The study finds a substantial constitutional and statutory framework for women's safety, but the effectiveness of that framework depends on implementation, institutional capacity and access to remedies.
2. Article 39A adds a distinct access-to-justice dimension: legal protection is less meaningful where women cannot obtain timely legal aid, representation, compensation assistance or information about available remedies.
3. The BNS, 2023 and BNSS, 2023 have shifted the contemporary criminal-law framework; their practical value will depend on survivor-sensitive investigation, evidence handling, fair procedure and timely adjudication.
4. The judicial decisions examined in the study show a continuing emphasis on dignity, privacy, bodily autonomy, protection from stereotypes and institutional responsibility.
5. NCRB data confirm a high level of recorded crime against women, while the methodology of the statistics requires caution because reporting and recording practices affect the figures.
6. Domestic-violence and workplace-safety protections depend on functioning institutional mechanisms rather than legislation alone, and emerging digital harms require additional technical and procedural capacity.

²² X v Principal Secretary, Health and Family Welfare Department, Government of NCT of Delhi, 2022 SCC OnLine SC 1321 [2022 INSC 740].

7. Overall, the principal enforcement gap is coordination: policing, legal aid, health care, institutional complaint systems, prosecution and courts must operate as a connected justice chain.
8. Effective women's safety requires coordination among police, courts, legal services authorities, health institutions, employers, educational institutions and civil society.

8. Recommendations / Policy Reforms

1. Issue and monitor survivor-sensitive BNSS implementation protocols covering reporting, investigation, medical examination, forensic evidence, witness support and supervision.
2. Strengthen Article 39A implementation by ensuring prompt, confidential and local-language legal aid, with clear referral pathways for compensation and rehabilitation.
3. Establish integrated referral mechanisms among police, legal services authorities, hospitals, One Stop Centres, shelters, workplaces and courts so that survivors are not required to navigate fragmented systems alone.
4. Make periodic gender-sensitisation and trauma-informed training mandatory for police, prosecutors, judges, medical personnel and institutional complaint committees, with measurable compliance standards.
5. Ensure that Internal Committees and Local Committees under the 2013 workplace-harassment law are functional, independent, accessible and adequately trained; similarly, provide sufficient Protection Officers and support services under the domestic-violence law.

9. Conclusion

Women's safety in India is best understood as an enforceability problem as much as a legislative one. Constitutional guarantees of equality, dignity, autonomy and access to justice provide the normative foundation, while the BNS, BNSS and specialised protective statutes supply substantive and procedural mechanisms. The cases examined in this study demonstrate that judicial protection is increasingly attentive to survivor dignity, privacy, bodily autonomy and freedom from gender stereotypes.

The central finding is that formal rights become meaningful only when institutions can convert them into accessible remedies. The NCRB data show the continuing scale of recorded offences, but

they must be interpreted alongside the effects of reporting, registration and institutional capacity. A sustainable response therefore requires a coordinated justice chain in which law, policing, legal aid, health services, workplaces and courts reinforce one another. The future of women's safety depends not on adding legislation alone, but on measurable implementation, accountability and equal access to justice.

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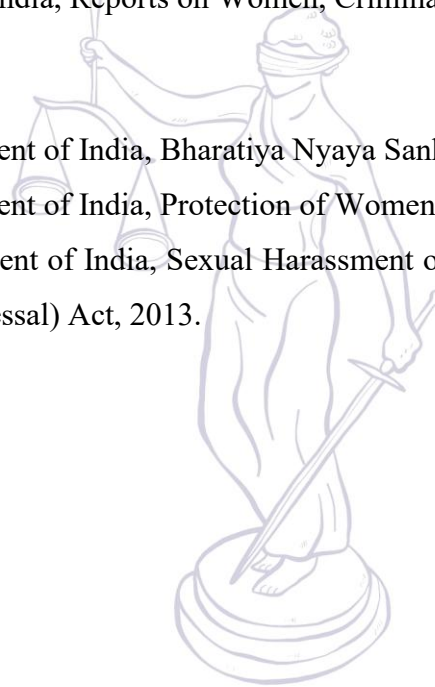
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