



BLIND FOLD LEGAL JOURNAL

VOLUME-2 ISSUE-4

{Mar. 2023 - May 2023}

E-Mail:- blindfoldjournal@gmail.com

Website: - www.blindfoldjournal.com

LEGISLATIVE GENDER BIAS: A COMPARATIVE STUDY BETWEEN INDIA & USA

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Abstract

This research paper aims to undertake a comparative analysis of gender bias in the legal systems of India and the United States. Gender bias is a persistent issue in both countries, with all genders often facing discrimination in various forms, including employment, education, and politics.

The paper will examine the relevant laws and policies in India and the United States that seek to address gender bias, such as the Federal Criminal code and Indian Penal Code in India. It will also investigate the implementation and enforcement of these laws, examining their effectiveness in protecting the rights of women.

The study will employ a qualitative research design approach. The findings will shed light on the similarities and differences in the legal approaches to gender bias in India and the United States, and provide insights into the challenges and opportunities for further progress in the fight for gender equality in both countries.

Keywords: Gender Bias, Federal Criminal Code, Indian Penal Code

Introduction

Gender bias in legislation is a global issue that affects the fundamental rights and well-being of individuals. Despite global efforts towards gender equality, discriminatory laws and policies continue to exist in many countries, which perpetuate gender-based inequalities. The United States and India, two of the world's largest democracies, have been grappling with this issue for a long time. This research paper aims to explore the legislative gender bias in both countries and compare their approaches towards achieving gender equality in legislation. The study will examine the contemporary factors that have contributed to the persistence of gender bias in legislation and identify the key legislative gaps and challenges in addressing this issue.

Research Objectives:

1. To determine the extent of gender bias in Indian legislation.
2. To determine the extent of gender bias in US legislation.
3. To compare and critically analyze both Indian and US legislations on the basis of gender bias.

Research Methodology

Research undertaken is purely doctrinal and the data collected is primary source which includes statutes, legislations, case-Laws etc. Secondary source includes books, journals, articles etc.

Research Question

1. What are the similarities and differences in the laws and policies with respect to gender bias in India and the United States?
2. How do the legal systems of India and the United States address this issue of gender bias?

• GENDER BIAS -

We consider the justice that is administered when our laws are biased against one gender or are gender-specific. There are concerns about a decision's fairness or the manner in which the matter was handled. The Indian Penal Code's gender bias has its origins in societal standards and the role-assignment practices that are based on the child's gender identification. We have diverse ideas about the two genders as a result of the distinction in their separate status. Regarding how the word "he" is used in the IPC, a differentiation needs to be made. In other places, the distinction between "man" and "woman" is clear, emphasizing the specificity of the provision. While "he" can refer to either a male or girl of any age, it is used in a neutral meaning.

• THE CONCEPT OF EQUALITY

The idea of equality is one that is important for society's well-being. India's Constitution, which is the world's longest constitution, contains a preamble. The constitution guarantees equality before the law and equal protection under the law. The country's residents now have the assurance that the judicial system and the laws that govern them would treat them fairly. Discrimination on the basis of religion, ethnicity, caste, sex, or place of birth is another issue that is addressed and outlawed. Regarding this

item, there is equality with regard to the numerous IPC requirements. As the reality unfolds, gender prejudice as shown in numerous clauses is currently being discussed. When the code was written and put into effect, the cultural climate was substantially different. Many NGOs and activist groups are speaking out against this bias. Therefore, the law directing the populace cannot be empty words. It must adapt to the times as they change. The prevailing patriarchy and the disparity in power between men and women are the fundamental building blocks of the cultural background at the time the IPC was drafted. According to a reading of the IPC's provisions, a person's gender is associated with a binary concept. Men are perceived as having more power than women or as being the more dominant sex. Women are perceived as weak and defenceless. Certain rights that only apply to women and in which women alone can suffer victims have been recognized. This must be acknowledged correctly because crimes against women that are classified in the IPC are growing more common. This civilization is plagued by horrific incidents like the Nirbhaya gang rape case. But we can't overlook the other range of these acts, the other victims, or another reality. The goal of justice is defeated by this ignorance and stubbornness. In today's society, it is an issue when one gender is victimized while the other is accused of being guilty. The third sex is also being watched, as people's access to justice is hampered by gender bias toward either one of the binary genders. The fundamental human rights of the third gender are also under danger in this situation because of the gender bias of our laws. The intersectional perspective is one more angle to take into account here. It is important to recognize that experiences and situations differ between men and women. Power dynamics and situations are different. Therefore, it is essential to look at the different power combinations in a particular situation. The goal here is to look at the IPC clauses that reveal gender bias. We also look at the concept of gender neutrality, which contends that our laws shouldn't be biased in favour of one gender while demonizing or ignoring another.

- **A CRITICAL APPRAISAL OF INDIAN PENAL CODE, 1860**

The following clauses have been succinctly examined to show and illustrate the persistent gender bias in Indian criminal law enforcement:

- 1. SECTION 498A – HUSBAND OR RELATIVE OF HUSBAND OF A WOMAN SUBJECTING HER TO CRUELTY**

Section 498A covers the issue of "cruelty" inflicted upon a woman by her husband or his relatives. However, there is a gender bias inherent in this section which makes it vulnerable to abuse. Cruelty is

a crucial factor that leads to various other crimes against women, but its misuse defeats the purpose of justice. In the case of *Sushil Kumar Sharma v. Union of India*¹, the Supreme Court stated that the misuse of this legal provision is tantamount to legal terrorism. The provision is intended to be used as a shield, not a weapon. Misuse of this provision can also deter its actual implementation. To promote gender neutrality in this regard, various cases have interpreted the term "cruelty" differently. In the case of *Vinita Saxena v. Pankaj Pandit*², the Supreme Court opined that "cruelty" can vary depending on the parties' lifestyle and conditions and how much importance they attach to human and cultural values. This encourages change and a broader interpretation. The concept of "mental cruelty" has also been discussed, which includes making false allegations against the husband. In the case of *Rajesh Kumar & Ors v. State of U.P.*³, the Apex court issued directives to prevent the misuse of section 498A⁴, which is a welcome change.

2. SECTION 354 – ASSUALT OR CRIMINAL FORCE TO WOMAN WITH INTENT TO OUTRAGE HER MODESTY

The sanctity of a woman's modesty is highly regarded in our society. As a result, any violation of this principle is punishable by law. However, the concept of a man's modesty is often overlooked, and instances of male bullying are not addressed formally under the Indian Penal Code (IPC). This makes it difficult for men to speak up about abuse or harassment. It is important to acknowledge that men can also be victims and vulnerable in certain situations. The word "modesty" is problematic as it implies that a woman's virtue is defined by her sexuality. This societal norm perpetuates sexual offenses that primarily victimize women.⁵

3. SEC 493- COHABITATION CAUSED BY A MAN DECEITFULLY INDUCING A BELIEF OF LAWFUL MARRIAGE

IPC Section 493⁶ deals with cases where a man deceitfully induces a belief of lawful marriage and cohabits with a woman. This crime is gender-specific and can only be committed by a man. The law

¹ *Sushil Kumar Sharma v. Union of India*, 2005 SC WRIT PETITION CIV. 141 OF 2005

² *Vinita Saxena v. Pankaj Pandit*, (2006) 3 SCC 778

³ *Rajesh Kumar & Ors v. State of U.P.*, 2017 SCC 821

⁴ Indian Penal code, 1860 § 498A, No. 45, Acts of Parliament, 1860 (India).

⁵ Indian Penal code, 1860 § 354, No. 45, Acts of Parliament, 1860 (India).

⁶ Indian Penal code, 1860 § 493, No. 45, Acts of Parliament, 1860 (India).

fails to recognize that a woman can also induce the belief of marriage and engage in sexual intercourse with a man. This gender bias assumes that men are not vulnerable to such situations and can take care of themselves. It is important to address such biases and recognize that men and women have different experiences and vulnerabilities in life.

4. SECTION 375 – RAPE

Examining this provision reveals a clear indication of the victim and perpetrator involved in rape. The act of "rape" is committed by a "man" who engages in sexual intercourse with a "woman". There are six descriptions provided to clarify this⁷. The section emphasizes the importance of obtaining consent and willingness for sexual intercourse. However, it has not been traditionally acknowledged that a man's consent and willingness may also be necessary. This is due to the various stereotypes attached to gender roles, where men are perceived as having power over women, and only women can be victims. Additionally, women cannot be perpetrators of this crime it is always the men who are the offenders. By being gender-specific, this section excludes the transgender community from being victims of such offenses under the country's penal laws.

Can a woman be charged with committing rape? This question arose in the case of Priya Patel v. State of M.P.⁸ The court had to determine if a female could be held responsible for gang rape under common intention. The woman in question was accused of violating Section 376(2)(g) of the IPC⁹, but the court decided to drop the charges against her. The court also rejected the allegation that the woman had abetted the crime. The Supreme Court stated that the woman did not have the intention to commit rape. Although Section 376(2)(g) does not specify that the perpetrator must be male, rape is generally considered a crime committed by men. When it comes to crimes committed against men, the terminology changes and such acts are often not penalized under the country's criminal laws. Instead, they are referred to as "sodomy".

5. SECTION 497 OF INDIAN PENAL CODE -ADULTERY: TAKEN DOWN

This section was eliminated in 2018. Section 497¹⁰ addressed the issue of infidelity. It has been declared that this is a matter that the couple can handle privately. However, this section had a gender bias that was challenged: - This rule permitted the husband to bring criminal charges against the lover

⁷ Indian Penal code, 1860 § 375, No. 45, Acts of Parliament, 1860 (India).

⁸ Priya Patel v. State of M.P., 6 SCC 263

⁹ Indian Penal code, 1860 § 376(2)(g), No. 45, Acts of Parliament, 1860 (India).

¹⁰ Indian Penal code, 1860 § 497, No. 45, Acts of Parliament, 1860 (India).

of his wife. The wife was not punished despite being complicit in the act. This led to the inference that only a man can have the intention of infidelity. - The husband was considered a victim of the sexual relationship between his wife and another man since it was done without his consent. - The wife is not protected if her husband engages in the same action. She cannot bring similar criminal charges. - It also refers to the consent that the wife requires from her husband, which is absent to establish a sexual relationship with another man. This provision was harmful to both genders. The intention behind it was to preserve the sanctity of marriage. However, the progressive thinking adopted by the Supreme Court paved the way for this to be treated as a private matter for couples to handle.

6. SECTION 304B – DOWRY DEATH

According to sec 304B¹¹, if a woman passes away due to burns or physical injury within seven years of her marriage, and it is proven that she experienced cruelty or harassment from her husband, any of his relatives, or in relation to dowry demands, her death will be classified as a dowry death. The husband or relative responsible for the mistreatment will be held accountable for her death. Additionally, Section 113B of the Indian Evidence Act must also be taken into account¹². This section presumes that the accused caused the woman's death if it is demonstrated that she was subjected to cruelty and harassment by him shortly before her demise. In such cases, the husband and his family members are often considered the culprits, even if they did not commit the crime. This provision is heavily biased in favour of women. Dowry-related deaths pose a significant threat to society and are a matter of great concern. This is an undeniable fact. However, it is crucial to scrutinize the validity of the accusations before establishing guilt. An article published in "The Hindu" narrates a case where the court found the allegations to be baseless and the evidence fabricated¹³. The complainant had claimed that her spouse and his family members had tried to kill her using kerosene and then set her ablaze as she failed to meet their dowry demands. She suffered burn injuries, and the accused were charged under Sections 302 and 304B. Nevertheless, during cross-examination, her parents, who had earlier supported her allegations, retracted their statements. Consequently, the court halted the proceedings and detained her parents for providing false evidence

¹¹ Indian Penal code, 1860 § 304B, No. 45, Acts of Parliament, 1860 (India).

¹² The Evidence act, 1872 § 113B, No. 01, Acts of Parliament, 1872 (India).

¹³ Nirnimesh kumar, Dowry death: parents found guilty of giving false evidence, The Hindu (Jan 10, 2023, 09:00), <https://www.thehindu.com/news/cities/Delhi/dowry-death-parents-found-guilty-of-giving-false-evidence/article21262750.ece>.

in a legal proceeding. Another instance that illustrates the bias's impact is the National Crime Records Bureau's (NCRB) data. In 2012, approximately 200,000 individuals were accused and apprehended for dowry-related offenses. Nonetheless, only 14.4% of them were convicted¹⁴.

7. SECTION 376 B/C/D

The offences committed by public servants wherein a woman is seduced, and such acts are punishable under the penal code. However, the provision does not acknowledge that women in positions of power can also commit the same offence against men or women. This not only highlights the abuse of power but also reinforces the stereotype that women are not capable of committing sexual offences.

• EFFECT OF GENDER BIAS ON TRANSGENDER COMMUNITY

The third gender has often been neglected. The different provisions of the IPC that provide gender specificity assume the binary concept of genders. Consequently, the penal provisions will not safeguard the transgender community. The case of National Legal Services Authority (NALSA) vs Union of India¹⁵ is a significant example in this regard. The court recognized the discrimination faced by them. It was highlighted that their gender identity deserves respect, and they have equal rights as guaranteed in the Constitution¹⁶. As a result, the centre furthered the Transgender Persons (Protection of Rights) Bill 2019¹⁷. However, this was met with strong opposition from the transgender community. The bill necessitated the issuance of a certificate of transgender status to the individual, and the authority to do so was vested in the government. This can be viewed as exploitative, and the fundamental principle of self-identity needs to be "examined." The Bill acknowledged the offense of sexual abuse against transgender persons, but the penalties differ from when the same crime is committed against a woman. The prescribed punishment ranges from six months to two years, which is lenient. Therefore, the laws require a revision due to the crimes experienced by this community with hardly any legal recourse.

¹⁴ Avneet Arora, 80 per cent of all dowry cases in India end in acquittal, SBS Punjabi (Jan 10,2023, 09:00),

<https://www.sbs.com.au/language/punjabi/en/article/80-per-cent-of-all-dowry-cases-in-india-end-in-acquittal/aets82803> .

¹⁵ National Legal Services Authority (NALSA) vs Union of India, (2014) 5 SCC 438

¹⁶ *New law that was to guarantee the rights of Transgender persons actually undermines these*, FINANCIAL EXPRESS (Jan 20, 2023, 01:30), <https://www.financialexpress.com/opinion/new-law-that-was-to-guarantee-the-rights-of-transgender-persons-actually-undermines-these/1777397/>

¹⁷ PRS Legislative Research, <https://prsindia.org/billtrack/the-transgender-persons-protection-of-rights-bill-2019> (last visited Jan. 10,2023).

- **OVERVIEW OF GENDER BIAS IN USA LEGISLATIONS-**

Discrimination based on gender has been a long-standing issue in many countries, including the United States. Women and gender minorities have been historically excluded from certain opportunities and subjected to harmful stereotypes and biases. To address this problem, federal laws have been enacted in the United States to prohibit discrimination based on gender in various settings. These laws have been instrumental in promoting gender equality and ensuring that individuals are not discriminated against based on their gender.

Gender bias in the Federal Criminal Code of the United States is a serious issue that affects the lives of many individuals. Despite the existence of several federal laws that prohibit discrimination based on gender, there are still instances where gender bias is evident in the application of criminal laws.

- **FEDERAL CRIMINAL CODE**

One area where gender bias is evident in the Federal Criminal Code¹⁸ is in cases of sexual assault and rape. While there are laws that prohibit sexual assault and rape, there are instances where these crimes are not taken seriously or are not investigated properly. This is often due to societal attitudes towards sexual assault and rape, which can be biased against women.

Another area where gender bias is evident in the Federal Criminal Code is in cases of domestic violence. Domestic violence is a serious issue that affects many individuals, but there are instances where the criminal justice system does not take it seriously. This is often due to societal attitudes towards domestic violence, which can be biased against women.

Gender bias in the Federal Criminal Code can also be seen in cases of employment discrimination. While there are laws that prohibit employment discrimination based on gender, there are instances where these laws are not enforced properly. This is often due to societal attitudes towards gender roles in the workplace, which can be biased against women.

In addition to these areas, gender bias can also be evident in the application of other criminal laws. For example, there are instances where women are punished more severely for certain crimes than men. This is often due to gender biases that exist within the criminal justice system.

To address gender bias in the Federal Criminal Code, it is important to raise awareness of the issue and to advocate for change. This can be done through education and outreach, as well as through the

¹⁸ United States Code, <https://uscode.house.gov/view.xhtml?path=/prelim@title18&edition=prelim> (last visited Jan. 10, 2023).

implementation of policies and programs that promote gender equality.

One example of such a program is the Violence Against Women Act (VAWA), which was enacted in 1994¹⁹. VAWA provides funding for programs and services that address domestic violence, sexual assault, and stalking, and it also strengthens penalties for these crimes. While VAWA has been effective in addressing gender bias in the criminal justice system, there is still much work to be done.

1. U.S. Code Title 42, Chapter 21 - CIVIL RIGHTS

This is a federal law that prohibits discrimination on various grounds, including gender²⁰. However, despite its clear language, gender bias remains a pervasive problem in the implementation of this law. One of the areas where gender bias is most apparent is in the enforcement of anti-discrimination laws in the workplace. Despite the existence of laws such as Title VII of the Civil Rights Act of 1964, which prohibits employment discrimination on the basis of sex, many women still face unequal pay, harassment, and other forms of discrimination in the workplace. Studies have shown that women earn only 80 cents for every dollar earned by men, with even larger wage gaps for women of colour. Women are also less likely to be promoted to high-level positions, and are more likely to face sexual harassment on the job.

Gender bias in the U.S. Code Title 42, Chapter 21 - Civil Rights, is also apparent in the area of housing. The Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on sex, among other factors. However, women are more likely to face discrimination in housing than men. Women who are pregnant or have children are often discriminated against, as landlords may view them as a financial risk or a nuisance. Additionally, transgender individuals may face discrimination in housing based on their gender identity.

In education, Title IX of the Education Amendments of 1972 prohibits sex discrimination in educational programs that receive federal funding. Despite this law, women and girls still face discrimination in the classroom, on the playing field, and in other educational settings. Girls are often discouraged from pursuing STEM (science, technology, engineering, and math) fields, and are less likely to receive support for these subjects. Women athletes often receive less funding and less media attention than their male counterparts, and may face unequal treatment in terms of facilities and resources.

¹⁹ United States Code, <https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter21&edition=prelim> (last visited Jan. 10, 2023).

²⁰ National Violence Against Women Prevention Research Centre, <https://mainweb-v.musc.edu/vawprevention/policy/vawa.shtml> (last visited Jan. 10, 2023).

Furthermore, U.S. Code Title 42, Chapter 21 - Civil Rights, is also biased when it comes to healthcare. Women often face discrimination in healthcare settings, with doctors and healthcare providers frequently dismissing or minimizing their symptoms. This is particularly true for women of colour, who are more likely to experience negative health outcomes due to systemic racism and bias in healthcare. Women may also face discrimination in access to reproductive healthcare, including birth control and abortion services.

2. U.S. Code Title 18 - CRIMES AND CRIMINAL PROCEDURE

One of the most prominent examples of gender bias in Title 18²¹ is the issue of sexual assault. While the code defines sexual assault as any type of non-consensual sexual contact, it does not adequately address the unique challenges faced by female victims. This is particularly true in cases where the victim is incapacitated or otherwise unable to give consent. In these situations, there is often a presumption that the victim is at fault for their own assault, rather than the perpetrator.

Another area where gender bias can be seen in Title 18 is in the sentencing guidelines for crimes. While the guidelines are supposed to be gender-neutral, research has shown that they are often applied in a way that disproportionately affects women. For example, women are more likely to receive longer sentences than men for the same crime, and are less likely to be granted parole or other forms of early release. The issue of gender bias in Title 18 also extends to the way that domestic violence cases are handled. While the code does recognize domestic violence as a criminal offense, there are still many cases where victims are not taken seriously or are not given the support, they need to escape abusive situations. This is particularly true for women who may be financially dependent on their abusers and therefore have a harder time leaving.

One of the biggest challenges in addressing gender bias in Title 18 is the fact that it is often ingrained in the legal system itself. Many of the laws and procedures that govern criminal trials were developed during a time when gender roles were much more rigid than they are today. As a result, there is often a cultural bias against women that makes it harder for them to receive equal treatment under the law. There are, however, steps that can be taken to address gender bias in Title 18. One approach is to educate judges, prosecutors, and other legal professionals about the issue and to provide them with training on how to recognize and avoid bias. Another is to review and revise the sentencing guidelines to ensure that they are truly gender-neutral and do not unfairly impact women.

²¹United States Code, <https://uscode.house.gov/view.xhtml?path=/prelim@title18&edition=prelim> (last visited Jan. 10, 2023).

In addition, it is important to create a legal system that is more supportive of victims of domestic violence and sexual assault. This includes providing resources and support for victims who are trying to leave abusive situations, as well as creating better laws and procedures for prosecuting these crimes. Gender bias in Title 18 is a complex issue that requires a multi-faceted approach to address. While there have been some steps taken in recent years to address the issue, there is still a long way to go before we can say that the legal system is truly fair and equitable for all.

- **COMPARITIVE APPRAISAL OF US AND INDIAN LEGISLATION-**

India and the United States are two of the largest democracies in the world, each with its own set of laws and legal systems. In this article, we compare the Indian Penal Code (IPC) and the criminal laws of the United States on the basis of gender bias. The IPC was drafted in 1860, and it has been amended several times since then. The criminal laws of the United States, on the other hand, are found in the US Code, which is a compilation of federal laws enacted by the US Congress. One of the most significant differences between the two legal systems is the treatment of rape and sexual assault. In India, the IPC definition has rape explained as non-consensual sexual intercourse with a woman, and the punishment can range from seven years to life imprisonment. However, the law has been criticized for being gender-biased, as it does not recognize the possibility of a man being raped. In addition, the law is limited in its scope, as it only covers heterosexual rape and no other forms of sexual violence.

In the United States, the criminal laws relating to rape and sexual assault vary from state to state. However, there is a growing recognition of the need to address sexual violence and gender bias in the legal system. In recent years, several high-profile cases of sexual assault have brought attention to the need for more effective laws and better enforcement.

Another area of difference between the two legal systems is in the treatment of domestic violence. In India, domestic violence is covered under the Protection of Women from Domestic Violence Act, which provides for a wide range of protective measures for women who are victims of domestic violence. However, the law has been criticized for not including men as potential victims and for not providing adequate protection for women in certain situations.

In the United States, domestic violence is treated as a criminal offense, and the laws vary from state to state. However, there is a growing recognition of the need to address gender bias in the legal system, particularly in cases of domestic violence. In recent years, several states have implemented stricter laws and increased funding for domestic violence prevention and support services.

In terms of the treatment of women in the criminal justice system, both India and the United States have been criticized for gender bias. In India, women are often not taken seriously by law enforcement and the judiciary, and there are significant barriers to reporting sexual assault and obtaining justice. In the United States, women are often subject to harsher sentences than men for similar offenses, and there is a lack of gender-sensitive treatment programs for women in the criminal justice system.

Overall, while both the IPC and the criminal laws of the United States have been criticized for gender bias, there is a growing recognition of the need to address these issues. In recent years, both India and the United States have implemented reforms aimed at improving the treatment of women in the legal system and preventing gender bias.

The legal systems of India and the United States differ in several ways, particularly in their treatment of rape, sexual assault, and domestic violence. While both legal systems have been criticized for gender bias, there is a growing recognition of the need to address these issues and implement reforms aimed at improving the treatment of women in the legal system. It is important for both countries to continue to work towards greater gender equality in their legal systems, and to ensure that all individuals are treated fairly and equally under the law.

CONCLUSION –

In conclusion, both India and the United States have criminal laws that address gender-based crimes, but there are significant differences in the legal frameworks of the two countries. India's IPC has been amended over the years to address gender-based violence and discrimination, including specific provisions for crimes like dowry deaths, acid attacks, and sexual harassment. However, the implementation and enforcement of these laws remain a challenge, and gender-based violence and discrimination continue to be prevalent in the country.

In contrast, the US criminal law system has evolved through several federal laws that specifically prohibit gender discrimination in various settings. These include Title VII of the Civil Rights Act, the Equal Credit Opportunity Act, the Fair Housing Act, and Title IX of the Education Amendments, among others. While these laws provide a strong legal framework for addressing gender-based crimes, there are still challenges in implementation and enforcement, as evidenced by ongoing issues such as unequal pay and workplace harassment.

It is clear that both countries have made strides in addressing gender bias in their criminal laws, but

there is still a long way to go in terms of effectively implementing and enforcing these laws to protect women and marginalized gender identities from discrimination and violence. This requires not only legislative changes but also cultural shifts and societal attitudes towards gender equality. It is only through sustained efforts across various sectors and stakeholders that we can hope to achieve true gender justice and equity in both India and the US.

