
INDIAN KNOWLEDGE SYSTEM AND WOMEN: A JOURNEY TOWARDS ACCESS TO JUSTICE AND EMPOWERMENT

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ABSTRACT

The historical development of women's rights and their access to justice is a complex narrative marked by significant milestones and persistent barriers. In many societies, including India, the evolution of women's rights has been deeply influenced by social, cultural, and legal transformations. Traditionally, women's roles were often confined to domestic spheres, with limited legal rights or access to justice. In ancient societies, women's status was shaped by cultural and religious norms that often restricted their autonomy. For example, in ancient Hindu texts, women's rights were defined in relation to their duties as wives and mothers, with limited emphasis on individual legal rights. The introduction of various laws, such as the Commission of Sati (Prevention) Act, 1987, Dowry Prohibition Act, 1961, Indecent Representation of women (Prohibition) Act, 1986, the Protection of Women from Domestic Violence Act, 2005 etc., aimed to address specific issues affecting women. Despite these legal advancements, the effectiveness of such laws has often been hindered by social attitudes and inadequate implementation and women continue to face significant barriers in accessing justice. Socio-cultural norms, systemic biases, and inadequate legal infrastructure often impede women's ability to seek justice. This paper examines how traditional knowledge systems and practices impact women's rights advancing gender equality. It discusses contemporary efforts to integrate traditional knowledge with modern legal frameworks to address issues of justice, including reform initiatives at grassroots level. By analyzing historical contexts and contemporary legal frameworks, this paper aims to provide insights into how leveraging IKS can foster more inclusive and effective pathways towards women's empowerment and access to justice in India.

Keywords: Access to Justice, Women's Rights, Legislative Reforms, Legal Frameworks.

INTRODUCTION:

Over millennia, the diverse culture of India has fostered and transformed a complex web of system of knowledge that are intricately woven together. The pivotal role of women is located at the nexus of this cultural richness and the dynamics of society. Indian women have always been both knowledge creators and holders, yet their journey towards accessing justice and empowerment within the Indian knowledge system has been fraught with challenges and complexities. The Indian knowledge system, deeply rooted in ancient philosophies, scriptures, and practices, has traditionally assigned significant roles to women as custodians of knowledge and wisdom. However, the realities of patriarchy, casteism, and other intersecting forms of discrimination have often restricted women's access to education, decision-making platforms, and legal recourse. Despite these obstacles, the trajectory of women's struggle for justice and empowerment within the Indian knowledge system has been marked by resilience and gradual progress. This journey towards women's access to justice and empowerment within the Indian knowledge system encompasses multifaceted dimensions. It traverses through historical narratives of women scholars and practitioners who defied societal norms to pursue knowledge and contribute to various fields. It delves into the evolving legal frameworks and policy interventions aimed at safeguarding women's rights and promoting gender equality. Furthermore, it critically examines the persisting barriers and gaps that hinder women's full participation and recognition within the realms of academia, science, technology, and traditional knowledge systems.

Analysing the complexities of the institutional, social, and cultural forces influencing this discourse is crucial as we dive into the complex relationship between women's search for justice and empowerment and the Indian knowledge system. We can create a more inclusive and equitable knowledge ecosystem that recognizes the contributions of women and accelerates their path to justice and empowerment by dissecting these complexities and appreciating the varied voices and experiences of women belonging to various caste, class, religion, and geographical borders.

TRAJECTORY OF HISTORICAL DEVELOPMENT OF WOMEN'S STATUS IN INDIA:**Ancient Period**

The Indian knowledge system has a long history of emphasizing women's rights and empowerment. Women's rights and empowerment have long been recognized as important in the Indian knowledge system. Verses from ancient literature such as the Vedas and Upanishads emphasize women's roles in society and intellectual talents.

Vedic period

In the Vedic era, the whole position of women was fairly satisfactory¹. Women are treated equally with men. They enjoyed similar rights and privileges as that of men.² “In the early Vedic ages women seem to have enjoyed equal rights with men”. “The wife and husband being the equal halves of one substance, were regarded equal in every respect and both took equal part in all duties-religious and social”.³ “In the Brahminic literature⁴ as well, a wife has been repeatedly called an equal associate”.⁵ As such, certain hints of the principle of equality formerly being between the participants to a marriage can be seen in the early Vedic period.⁶ “The Shatapath Brahman gives a high place to women by saying that women as mothers are the best and the foremost preceptors of children”.⁷ “The Vasishtha Sutra improves on this idea by observing that woman is a hundred times superior to man in instructing and elevating a child”.⁸

- **Educational rights:** The girls are educated like boys and had to pass through a period of Brahmacharya. They were entitled to get education about the Vedic literature. Women like Lopamudra, Ghosa and Sikata-Nivavari, Gargi etc. have wrote many Vedic hymns.
- **Age of marriage:** the marriage of girls used to take place at a fairly advanced age i.e., 16 or 17. Educate girls of this age had an effective voice in selecting their

¹ Dr Pooja Kumari, “Vedic Aged Women Empowerment,” 5 *The Creative Launcher* 148–52 (2020).

² A.S. Altekar, “The Position of Women in Hindu Civilization,” Motilal Banarsidass Publishers Private Limited, New Delhi, 2016.

³ Rigveda V-61-8.

⁴ Aitareya Brahman: “Sakhalha Jaya”.

⁵ “The Status of Women in Ancient India: A Vivid and Graphic Survey of Women’s Position, Social, Religious, Political and Legal, in Ancient India,” *INDIAN CULTURE* available at: <http://indianculture.gov.in/ebooks/status-women-ancient-india-vivid-and-graphic-survey-womens-position-social-religious> (last visited April 9, 2024).

⁶ ‘The Hindu Law’ by H. S. Gour, pp. 1174.

⁷ Matriman pitriman acharyavan purusho van.

⁸ Vasistha Sutra XIII-48.

partners. Women had the right to select their partners. There was no purdah system in that era.

- **Religious rights:** Women enjoyed complete parity with men in the realm of religious perception. Women had the ability to carry out sacrifices on their own and were not seen as a hindrance in their religious endeavours.
- **Proprietary rights:** During this period, women were incapable of owning property.
- **Practice of Monogamy:** Ordinarily, monogamy was the rule. Polygamy is limited to few rich and royal families.⁹
- **Practice of Sati was not known:** The sati system was not recognised in this period. But widow remarriage was allowed.
- **Women could participate in the public gatherings.** They usually occupied prominent place in social gatherings but denied to entered *sabhas*.¹⁰

Post Vedic period

In the post-Vedic period, the position of women somehow deteriorated.

- Women's education was neglected.
- Marriageable age was lowered.
- Child marriage was favoured.
- Widow remarriage was discouraged.
- Practice of sati was started.
- Proprietary rights of women were improved.

⁹ *Supra* note 3.

¹⁰ *Ibid.*

Medieval Period

The Medieval period had a negative impact on the status of Indian women.

- **Practice of Purdah system** was started to save women from the bad eyes of foreign rulers.
- **Women's education was disfavoured.**
- **A culture of harems was started** where women were kept as slaves or concubines.¹¹
- **Practice of Jauhar was started** which was very much similar to sati system.
- Overall, the **autonomy of Indian women was curtailed.**

Thus, the oppression of women was continued in the medieval era or we can say status of women become worse than Vedic era.¹²

British period

The colonial era in India brought about significant changes to the legal and social status of women. The British legal system brought new perspectives of women's rights and justice. Few of the significant changes are mentioned below-

- The **social status of women was improved** in the British period.
- **Female education was promoted.**
- Child marriages were prohibited by passing **Child Marriage Restraint Act of 1929.**
- The cruel practice of **sati system was also abolished** in 1829.
- **Widow remarriage Act, 1856 was passed** to improve the status of widows in Indian society.

¹¹ "Women in Medieval India", Available at: <https://www.studysmarter.co.uk/explanations/history/modern-world-history/women-in-medieval-india/> (last visited on 8 April, 2024).

¹² Sophie M. Tharaken and Micheal Tharaken, "Status of India: A Historical Perspective" 4 p. 115-123 (1975).

- **Proprietary rights of women were recognised.** The Hindu Women's Rights to Property Act, 1937 was passed which provide rights to women to enjoy property during their life time. Though the limited interest is created by this Act but it has improved the status women in the society.

Thus, during the British period, the position of women has enhanced to a greater extent.

Constitutional Mandates and Legal Frameworks: Enhancing Women's Access to Justice

After the post-independence the position of women in Indian society undergo a drastic change. The Indian Constitution's Preamble, Fundamental Rights, Fundamental Duties, and Directive Principles all include the notion of gender equality. The Constitution allows for positive discrimination in favour of women to address their socioeconomic, educational, and political disadvantages.¹³ Our laws, development strategies, plans, and programs have all focused on advancing women's status in many fields within the context of a democratic society. India has ratified international treaties and human rights instruments that promote women's equality. The ratification of the Convention on the Elimination of All Forms of Discrimination Against Women in 1993 is a significant step.¹⁴

1. Constitutional provisions

The constitution of India puts women on equal footing to the men. It provides right to equality¹⁵ to every person. It provides equal opportunities in appointments and employments in jobs.¹⁶ It provides for the right to life and dignity.¹⁷ It has made special provisions under Article 15(3)¹⁸ for the protection of the rights of the women and the empowerment of the women. It recognises the need for the proper representation of women in decision-making process. Thus, it makes provisions for the reservation of seats¹⁹ in village panchayats. It advocates for the equal pay for

¹³ Available at:

<https://parliamentlibraryindia.nic.in/writereaddata/library/Reference%20Notes/Crimeagainstwomen22-2-13.pdf>

¹⁴ India, Ministry of Statistics and programme Implementation, Women and Men in India 2012, 14th Issue, p. xiii.

¹⁵ Article 14, The Constitution of India, 1950.

¹⁶ Article 16, The Constitution of India, 1950.

¹⁷ Article 21, The Constitution of India, 1950.

¹⁸ Article 15(3), The Constitution of India, 1950.

¹⁹ Article 243 D, The Constitution of India, 1950.

equal work,²⁰ adequate means of livelihood for men and women,²¹ equal justice and free legal aid,²² maternity benefits,²³ renunciation of derogatory practices against women.²⁴

2. Legal reforms

Since ancient period to the modern period, various legal reforms have been done to empower the women. From recognising their right to education to recognising their right to remarriage, equal pay for equal work have made their life easy and dignified.

Major legal reforms took place in the nineteenth and twentieth century which has changed the landscape of women in the Indian society. Many social activists like Rajaram Mohan Roy, Ishwar Chand Vidyasagar, Jyoti Rao Phule etc., advocated for the various reforms in the Indian legal system and they were adopted to ameliorate the conditions of women in the society.²⁵

As we have seen in the Vedic period that men and women are treated equally. Women enjoyed the equal right of education like men, they have all the freedoms. They could also get remarried after the death of their husband. But there is no concept of *sati system*, *purdah system*, *child marriages* in the Vedic period. But in later Vedic period, the *sati system* was introduced, *purdah system* was followed, child marriages are being favoured, widow remarriages are disfavoured, girl's educational rights were also hampered. Women are being treated inferior to their male counterparts. Under the British rule, the situation of women has been enhanced and they were given rights and freedom. History tells us that in the struggle of India's Independence many great Indian women have participated, for example, Rani Lakshi Bai, Sarojini Naidu, Begum Hazrat Mahal, Aruna Asif Ali etc. Till date a series of legal reforms have been made with the changing times in order to protect the rights of women and provide justice to them.

- ***Hindu Widow Remarriage Act, 1856:*** This act makes it lawful for a Hindu widow to marry. In order to help Indian women live better and thrive in society, it has established a number of laws and guidelines.

²⁰ Article 39(d), The Constitution of India, 1950.

²¹ Article 39(a), The Constitution of India, 1950.

²² Article 39 A, The Constitution of India, 1950.

²³ Article 42, The Constitution of India, 1950.

²⁴ Article 51 A(e), The Constitution of India, 1950.

²⁵ Rouf Bhat and Mohd Wani, "Development of women's movement in India: A historical perspective," 25 *Temida* 93–109 (2022).

- ***The Child Marriage Restraint Act, 1929:*** This Act prohibits child marriages and fix the marriage age of female and male to be 14 years and 18 years respectively, until the rules were changed to give boys 21 years and girls 18 years.
- ***The Hindu Marriage Act, 1955:*** this Act was made regularised the marriages between the Hindus. It has made provisions for divorce and four additional grounds of divorce are given to female Hindus.
- ***The Hindu Succession Act, 1956:*** This Act regulated the proprietary rights. By the 2005 Amendment to this Act, daughters are made coparceners in the Hindu family property like the sons. Section 14 of the Act made female Hindu an absolute owner of the property.
- ***Dowry Prohibition Act, 1961:*** This Act was enacted to penalise the giving, taking and demanding of dowry.
- ***The Medical Termination of Pregnancy Act, 1971:*** This Act provide for the termination of pregnancies by registered medical practitioners. It provides for the grounds of termination of pregnancy.
- ***The Indecent Representation of Women (Prohibition) Act, 1986:*** This Act was enacted to prohibit the publication and advertisements of the indecent representations of women.
- ***The Pre-conception and Pre-natal Diagnostic Techniques (Prohibition of Sex Selection) Act, 1994:*** This Act was enacted to prohibit the determination of sex of unborn child in order to curb the menace of female foeticide.
- ***Protection of Women from Domestic Violence Act, 2005:*** This Act was made to prohibited violence against women in their domestic homes.
- ***The Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013:*** This Act was enacted to prevent and prohibit the exploitation of women at work places as it is opposed to constitutional right of equality and right to life and dignity.

3. Judicial decisions

Air India v. Nergesh Meerza,²⁶ in this case Indian Airlines has implemented a legislation mentioning the condition that air hostesses are not permitted to marry during their first four years of employment, that if they become pregnant, they will be fired, and that they will leave at the age of 35 unless the managing director extends their contract at his discretion. The court held that this legislation is violative of Article 14 of the constitution. In the case of **Shah Bano Begum v. Ahmad Khan**,²⁷ Supreme Court held that S. 125 of the CRPC, 1973 will apply to all spouses, regardless of religion, and the husband will be compelled to assist his divorced wife. Court said husband is liable to maintain his wife even after the completion of Iddat period. In **Shayra Bano v. Union of India**,²⁸ Supreme Court held that the pronouncement of triple talaq is unconstitutional. In **Vishakha v. State of Rajasthan**,²⁹ Supreme Court held that sexual harassment at workplace is the violation of article 14, 19 and article 21 of the constitution and it is against the principle of gender equality. Supreme court recommended to bring domestic law on the sexual harassment at workplace. In conformity of this judgment the parliament has enacted The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. In **Sarla Mudgal v. Union of India**,³⁰ Supreme Court held that a Hindu husband converting to Islam and marrying again will be guilty of bigamy. In **Joseph Shine v. Union of India**,³¹ Supreme Court in this case struck down the 158 years old law on adultery. It held that section 497 of the Indian Penal Code is the Violative of Article 14, 15 and 21 of the Constitution. It also stated that women are not the property of husband whose consent will exonerate the crime of adultery. Women has right to privacy and her sexual autonomy. In **Vineeta Sharma v. Rakesh Sharma**,³² Supreme Court held that daughter is coparcener by birth. It is immaterial whether her father was alive or not. Further court has upheld and re-established the retrospective application of 2005's amendment of section 6 of Hindu Succession Act. The list of cases upholding the rights of women are enumerable and exhaustive. Time to time Indian courts have tried to protect the personal life and dignity of women and to prevent

²⁶ AIR 1981 SC 1829.

²⁷ AIR 1985 SC 945.

²⁸ AIR 2018 SC (CIVIL) 1169.

²⁹ AIR 1997 SC 3011.

³⁰ AIR 1995 SC 1531.

³¹ AIR 2018 SC 4898.

³² 2020 9 SCC 1.

crimes against the women. In **Lalita v. State of Uttar Pradesh**,³³ Supreme Court ruled for the mandatory registration of FIR. In **Lilu @Rajesh v. State of Haryana**,³⁴ Supreme Court held that two-finger test is banned and held to be inhumane practice.

Therefore, all these constitutional provisions and legal reforms have raised the status of women in the society. Women are being empowered also through various government policies and programmes.³⁵ There is no doubt that the status of women have been increased and their rights are protected under various laws but in reality, women still face various obstacles in exercising their legal rights and accessing justice. It has been said that the Indian state's three branches—the judiciary, the executive, and the legislature—were unable to fully execute the constitutional mandate of equality due to their patriarchal views and attitudes.³⁶

Barriers in Accessing Justice:

While accessing justice in the criminal justice system, women face majorly three roadblocks in their quest for justice.³⁷ These major obstacles are *legal barriers*, *social barriers* and *financial barriers*.³⁸

- Legal Barriers
 - Non-registration of FIRs.
 - Delay in prosecution of the cases.
 - Non-diligent attitude of police officers.

³³ AIR 2014 SC 187.

³⁴ AIR 2013 SC 1784.

³⁵ Dr Rafi Ramzan Dar, “Women Empowerment: An In-Depth Understanding of the Challenges Faced by Indian Women, Steps Taken by Government and Way Forward,” 10 (2019).

³⁶ Lotika Sarkar, “Women’s Movement and the Legal Process Occasional,” 24 CWDS, New Delhi, 1-2 (1995).

³⁷ Divya Nimbalkar, “Women’s Access to Justice in India,” 2023 *available at*:

<https://www.legalbites.in/categories/law-library/women-child-rights/womens-access-to-justice-in-india-946718> (last visited April 8, 2024).

³⁸ Saurabh Uttam Kamble, “Strengthening Access to Justice for Marginalized Communities in India: Challenges and Solutions” *lawyersclubindia available at*: <https://www.lawyersclubindia.com/articles/strengthening-access-to-justice-for-marginalized-communities-in-india-challenges-and-solutions-16028.asp> (last visited April 4, 2024).

- Indecent questions asked in the prosecution.
- Gender biasness among the officers of the courts and police stations.
- Failed prosecutions and low convictions rates in the crime against women.
- Social Barriers
 - Social stigma attaches to the crime against women.
 - Ostracization by the society.
 - Women who approach police stations and courts are considered women of low virtue.
 - Women are being blamed for the crimes committed against them.
 - Women are considered impure if sexual offences are committed against them.
So, most of the women choose not to file the case.
- Financial Barriers
 - Poverty of litigants.
 - Cost of litigation.
 - Fees for the advocates.
 - Travelling cost as courts are situated at distant places.

Implementation Of Traditional Knowledge System for Enhancing Women's Access to Justice

Traditional methods of dispute resolution related to crimes against women in India have a long history rooted in community practices, often drawing from cultural norms, religious texts, and customary laws. These methods are often seen as an alternative or supplement to the formal legal system. However, it's important to note that while some traditional practices can be beneficial, others may perpetuate harmful norms and lack the safeguards provided by formal

legal processes. Here are some traditional methods of dispute resolution related to crimes against women:

- i. Disputes resolution by Panchayats.
- ii. Disputes resolution by Gram Nyayalayas.
- iii. Disputes resolution by community elders.
- iv. Disputes resolution by religious institutions.

Role of Panchayats in resolving disputes related to crimes against women.

Panchayats, which are self-governing local bodies, have historically been involved in resolving disputes. The Panchayat may be consulted in cases involving crimes against women, such as harassment or domestic violence. The Panchayat listens to both sides and tries to negotiate a settlement. It is frequently made up of esteemed elders or community leaders. Panchayats have been criticized for failing to protect the rights of woman and perpetuating the patriarchal norms. As we have seen how khap panchayats have been giving decisions against the women.

Role of Gram Nyayalayas in resolving disputes related to women

Encourage and strengthen Gram Nyayalayas, or village courts, as they are able to reconcile Panchayati justice with contemporary legal ideas. In rural places, women may have easier access to these gram nyayalayas.

Role of community elders in resolving disputes related to women

The settling of disputes is a major function of elders in many communities. When a woman is the victim of a crime, respected elders may be sought for by the accused, the victim, and their families. After hearing all viewpoints, the elders may offer suggestions for remedies including restitution, community service, or compensation.

Role of religious institutions in resolving disputes related to women

Certain religious establishments, such as mosques and temples, have participated in the settlement of disputes. Religious leaders act as a mediator for parties involved in crimes against women.

The advice of religious authorities was based on religious teachings and literature. This occasionally results in conclusions that may not be in line with contemporary legal standards since they are shaped by religious interpretations.

Since these traditional institutions are patriarchal, women's rights could not be sufficiently protected. This traditional method of dispute resolution lacks formal legal procedures, collection of evidences and legal representations. Under this system, there is possibility that women are being pressurised to accept unfair settlements in order to prevent social exclusion or shame. Thus, in order to guarantee the protection of women's rights, efforts should be directed toward modernizing traditional systems in conformity with the constitutional values and norms.

Implementation of Indian Knowledge system in contemporary legal frameworks

- Understanding the importance of traditional knowledge system.
- Promoting education of the women.
- Creating legal awareness among women.
- Promoting village panchayats and village courts in rural areas.
- Reforming the discriminatory customary laws related to women.
- Providing legal aids and supports in collaboration of various traditional institutions working for the rights of women.

Conclusions And Suggestions

Suggestions:

- Establishment of more **Mahila courts** (women's courts) and **Mahila thanas** (women's Police stations) in the states of India especially to those states where the crimes against women is high.
- Establishment of **Mahila Panchayats**, so that various issues related to women can be solved at the village level without going into the tiresome procedure of courts.

- **Legal awareness** about the women's rights and legal remedies. Legal remedies can only be avail if they know their legal rights.
- **Public awareness** about the punishments for crime against women.
- Starts **campaign creating awareness** about the **gender equality** and **gender sensitivity**.
- **Gender sensitization** of police officers, judicial officers, legal practitioners etc. Proper training should be given to these officers on regular basis.
- **Stop gender stereotyping** in the court rooms. There are many instances where the observations of judges show their gender prejudices.
- **Strict implementation of laws** specifically mentioned for the protection of women. For example, Crpc provides that statement should be recorded by women police officers in case of sexual offences against women, medical examinations should be done by female medical practitioners, arrest of woman should be made by women police officers barring few exceptions etc. All these rules should be strictly followed.
- **Number of women judges and women police officers should be increased.** Presence of female police officers in the police stations and female judges in the courts will boost the confidence of women victims in the Indian criminal justice system and they will come forwards for the protection of their rights.
- **Speedy disposal** of cases related to crimes against women.
- **Government needs to take necessary steps to make arrangements to provide facilities** which are mentioned in the various special laws made for the women. For example, in the Domestic Violence Act, 2005, the residence orders, protection orders, medical facilities orders, custody orders etc. Similarly, in the Dowry Prohibition Act, 1961 provisions for the protections officers are made. These provisions should be strictly followed and government should make proper arrangements for that.
- **Establishment of effective monitoring mechanisms** to check the proper implementations of the laws and policies of the government.

Conclusions:

The journey towards women's access to justice and empowerment within the Indian knowledge system is marked by progress, challenges, and opportunities. By building on historical insights, implementing legal reforms, and promoting social change, India continues to strive towards a more equitable and empowered future for all women. From ancient texts to contemporary initiatives, efforts have been made to protect women's rights and promote gender equality. However, patriarchal norms, implementation gaps, and lack of legal literacy continue to hinder full access to justice for women. By recognizing these historical patterns and challenges, policymakers, legal practitioners, and civil society can work towards more effective and equitable legal systems that uphold the rights of all women in India. Efforts should be made to maintain a balance between preserving cultural traditions and ensuring justice and equality for women. By combining the strengths of Indian knowledge systems with modern legal frameworks, it is possible to create a more inclusive and effective justice system for women.

Bibliography

1. “The Status of Women in Ancient India: A Vivid and Graphic Survey of Women’s Position, Social, Religious, Political and Legal, in Ancient India,” *INDIAN CULTURE* available at: <http://indianculture.gov.in/ebooks/status-women-ancient-india-vivid-and-graphic-survey-womens-position-social-religious> (last visited April 9, 2024).
2. “Women in Medieval India”, Available at: <https://www.studysmarter.co.uk/explanations/history/modern-world-history/women-in-medieval-india/> (last visited on 8 April, 2024).
3. “Women’s Access to Justice - Indian Law Portal,” 2020 available at: <https://indianlawportal.co.in/womens-access-to-justice/> (last visited April 8, 2024).
4. “Women’s Access to Justice,” *UN Women – Asia-Pacific* available at: <https://asiapacific.unwomen.org/en/focus-areas/governance/womens-access-to-justice> (last visited April 4, 2024).
5. A.S. Altekar, “The Position of Women in Hindu Civilization,” Motilal Banarsidass Publishers Private Limited, New Delhi, 2016.
6. Divya Nimbalkar, “Women’s Access to Justice in India,” 2023 available at: <https://www.legalbites.in/categories/law-library/women-child-rights/womens-access-to-justice-in-india-946718> (last visited April 8, 2024).
7. Dr Pooja Kumari, “Vedic Aged Women Empowerment,” 5 *The Creative Launcher* 148–52 (2020).
8. Dr Rafi Ramzan Dar, “Women Empowerment: An In-Depth Understanding of the Challenges Faced by Indian Women, Steps Taken by Government and Way Forward,” 10 (2019).
9. Lotika Sarkar, “Women’s Movement and the Legal Process Occasional,” 24 *CWDS*, New Delhi, 1-2 (1995).
10. Rouf Bhat and Mohd Wani, “Development of women’s movement in India: A historical perspective,” 25 *Temida* 93–109 (2022).

11. Saurabh Uttam Kamble, “Strengthening Access to Justice for Marginalized Communities in India: Challenges and Solutions” *lawyersclubindia* available at: <https://www.lawyersclubindia.com/articles/strengthening-access-to-justice-for-marginalized-communities-in-india-challenges-and-solutions-16028.asp> (last visited April 4, 2024).
12. Sophie M. Tharaken and Micheal Tharaken, “Status of India: A Historical Perspective” 4 p. 115-123 (1975).