

PalArch's Journal of Archaeology
of Egypt / Egyptology

"Workplace Sexual Harassment of Women in Assam: An Overview"

Ashraful Islam

Phd Research Scholar in the Department of Political Science, Tripura University (A Central University), Tripura, India.

Ashraful Islam, Workplace Sexual Harassment of Women in Assam: An Overview- PalArch's Journal Of Archaeology Of Egypt/Egyptology 18(1). ISSN 1567-214x

Keywords: Sexual Harassment, Workplace, Women, Assam.

ABSTRACT

Democratization and individualism make it easy for women across the world to participate in the workforce outside their homes. However, besides the prevailing power dynamics in the family structure among the genders, the working world has also been dominated by unequal power dynamics that endanger women's safety and security. In their workplace, they have to confront new forms of violence, gender discrimination, and harassment. For millions of women working globally, workplaces are sites of insecurity, violence, and vulnerability. Amidst numerous forms of harassment against working women, sexual harassment is frightful which grossly violates women's rights and dignity. To curb the sexual harassment against women at the workplace, India had enacted a law in 2013. Nonetheless, the crime like sexual harassment of women at the workplace has been increasing rapidly in India. As per various reports, the crimes against women in Assam top in some recent years. This paper is an effort to uncover the notions of sexual harassment of women at the workplace in the Indian state of Assam. The article explores the meaning and concept of sexual harassment of women at the workplace. The article primarily tries to examine the nature and extent of sexual harassment of women at the workplace in the state. This paper is mainly based on the research report carried out by the Department of Women Studies, Gauhati University in Collaboration with the North East Network. Along with this other secondary sources of data have also been followed while preparing this paper.

Introduction:

Women's lives have historically been restricted and limited to households and domestic activities across the world. It is historically recognized that the women's role and contribution towards their families have seldom been taken into account. In traditional cultures, women are primarily engaged themselves to look after their house, husband and bearing and rearing children. Till the Renaissance in Europe, society was perceived as an aggregate of families with one head- that of the male. This was the case with all important ancient civilizations: Greek, Roman, Indian,

Chinese and Teutonic (cited in Ramaswamy 2018, p.5). Even several great thinkers treated the patriarchal arrangement of households as a divine sanction. They argued that women always deserve inferior positions in society. In view of this, in his *Politics*, Aristotle, a pioneer of political science and an eminent philosopher, argues that "[T]he relation of male to female is by nature a relation of superior to inferior and ruler to ruled" (Jowett 1885). Although the Vedic Period in India, women enjoyed high status in society, including economic freedom; however, they started being discriminated since the later Vedic period. The status of women gradually decreased during the time of *Dharmashastras* and *Puranas* and underwent a dramatic change. According to Hindu Mythology *Manusmriti*, the divine law is one of the main texts of *Dharmashastras* where the status of women as depicted has very much deteriorated. Manus stated that "women have to be under father during childhood, under her husband during youth and under her son during old age" (Mahapatra 2018). Therefore, women across the globe had to fight to secure their rights and freedoms. In her glorious history, developed Europe faced some great revolutions against tyranny, inequality and injustices. With a strong commitment to human dignity, equality and freedom, the American (1776) and French (1789) revolutions laid the intellectual foundations of modern democracy. Nevertheless, these historical movements have brought no major changes to women's lives. Therefore, Marry Wollstonecraft (1759-1797) and Olympe de Gouges (1748-1793) had to question women's exclusion from equal citizenship rights in France.

The changes in the production process led to alterations in the social structure, which facilitated democratization in Western Europe (Ramaswamy, 2018, 5). Democratization and individualism make it easy for women to participate in the workforce outside their homes in Europe. Thus, women began to join the workforce outside their homes. As, by the end of the eighteenth century, women accounted for 50 per cent of Britain's factory labour force. Unlike in Britain, where women had to fight for more than a century to obtain some of their basic rights, the Constitution of India gave women equal rights with men from the very beginning. . Nonetheless, the status of women is a type of mystery in modern India. On the one hand, as established by the Constitution, she has gained equal status and roles in society, and, on the other hand, in the family and outside the family, she is constantly being discriminated and harassed. Nonetheless, the status of women is a type of mystery in modern India. On the one hand, as established by the Constitution, she has gained equal status and roles in society, and, on the other hand, in the family and outside the family, she is constantly being discriminated and harassed. With the advent of rapid industrialization, modernization, economic development and globalization, even millions of women of third world countries are also coming out from their home and started participating in social, economic, cultural and political activities of the country and sometimes beyond the boundary of the country. Despite their difficulties, women are continually striving to improve their status breaching the stereotyped role assigned to them by the patriarchal society. Furthermore, their condition has steadily been progressing as many of them are becoming educated, empowered, and economically independent. The percentage of female workforce participation significantly varies with the literacy rate. As per the 2011 census, the participation rate for women in the workforce is 25.51 percent

versus 53.26 percent for men all over India. The same Census report also shows that the total workforce participation rate is 38.36 percent, while the women workforce consists of 22.46 percent against 53.59 percent of male. The women workforce participation implies the percentage of women engaged in the total working population of a state or country. The actual causes for their low employment are found in the religious, cultural values, colonial ideology, and social institution evaluations that restrain women's entry in the labour market (Varghese 1993).

However, besides the prevailing power dynamics in the family structure among the genders, the working world has also been dominated by unequal power dynamics that endangered women's safety and security. In their workplace, they have to confront new forms of violence, gender discrimination, and harassment. In the workplace women have been facing numerous types of discrimination and abuse, regardless of nation, faith, culture, caste, and class, as indicated by several studies from different scholarships. However, nature, types, intensity, causes, and consequences of their problems are diverse across society.

For millions of women working globally, workplaces are sites of insecurity, violence, and vulnerability. Amidst numerous forms of harassment against working women, sexual harassment is frightful, which grossly violates women's rights and dignity. Sexual harassment of women in the workplace (SHWWP) has been ubiquitous, and it is considered one of the most frightening forms of violence globally. Statistics and studies worldwide have established that no institutions, nations, industries, and cultures are exempt from it. Here, one best illustration could be the United Nations. A survey which had been conducted amid the wider *#Me Too movement* regarding the sexual harassment in the UN, the highest prestigious international organization which has constantly been working for the international peace, development, human rights and gender equality and advancement of women, shows that one-third of its staff experienced sexual harassment, according to a report released by the United Nations. Speaking in terms of India, sexual harassment in the workplace is increasing over the time. A press released by the Ministry of Women and Child Development (GoI) on 8th February 2019 stated that "The National Crime Records Bureau (NCRB) has started collecting data regarding sexual harassment in the workplace under the category of insult to the modesty of women (section 509 of IPC) at office premises since 2014. A total number of 57, 119 and 142 cases were registered during 2014, 2015 and 2016 respectively". With the National Commission for Women (NCW), under the category of 'Sexual Harassment includes Sexual Harassment at Workplace' 539, 570 and 965 complaints were registered during 2016, 2017 and 2018, respectively. Surprisingly, in January 2019, 29 cases were registered under the specific category of complaints of 'Sexual Harassment of Women at Workplace'. The number of cases has therefore risen markedly over time. According to National Commission for Women (2018-19), registered cases of sexual harassment at Indian workplaces increased 54% from 371 in 2014 to 570 in 2017. Complaints and Investigation Cell of National Commission for women registered under the category of Sexual harassment, including sexual harassment in the workplace 750 cases in 2018.

Objectives:

1. To understand the meaning and concept of Sexual Harassment at the Workplace.
2. To examine the nature and extent of sexual harassment of women in the state

Methodology:

This paper is based on both primary and secondary data collected from a variety of sources. The primary information was gathered from various Govt. reports and Acts. As far as secondary sources are concerned, they have been collected from a variety of research papers, journals and books. The research tool used to analyse data obtained from various sources for the current study is content analysis. Furthermore, this study applies descriptive research method.

Conceptual Understanding:**What is workplace?**

Generally, workplace refers to places of employment and where someone works for their employer. A workplace is defined as “any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer for undertaking such a journey” (SH, Act, 2013). As per the Act, workplaces include both organized and unorganized sectors of employment. Workplace includes all the government organizations, private organizations, venture, society, trust, NGO’s, Places visited by the employee (including while on travel) including transportation provided by employer, a dwelling place or house.

Who is an aggrieved woman?

The Act defines the aggrieved women as all women whether engaged directly or through an agent including a contractor, with or without the knowledge of the principal employer. They may be working for remuneration, on a voluntary basis or otherwise. Their terms of employment can be express or implied. Further, she could be a co-worker, a contract worker, probationer, trainee, apprentice, or called by any other such name. The Act also protects a woman, who is working in a dwelling place or house.

What is Workplace Sexual Harassment?

It is generally accepted that sexual harassment includes two types of behaviour. The first is usually defined as “quid pro quo” and relates to where individual, often in a position in power, will explicitly or implicitly make sexual requests and/or advances. In exchange they may offer some desired compensation, for example promotion. The second is sexual harassment which can be defined as “hostile environment”, which refers to sex related behaviours which make the person being harassed feel uncomfortable, thereby creating an intimidating working environment (Smalensky & Kleiner, 2003).

In a landmark judgment, *Vishaka vs. State of Rajasthan* (1997) The Supreme Court defined sexual harassment as any unwelcome, sexually determined physical, verbal, or non-verbal conduct. Examples included sexually suggestive remarks about women, demands for sexual favours, and sexually offensive visuals in the workplace. Sexual harassment is defined as an unwelcome sexual advance or verbal or physical conduct of a sexual nature which has the purpose or effect of unreasonably interfering with the individual's work performance or creating an

intimidating, hostile, abusive or offensive working environment'(International labour organization 2005). According to Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, "Sexual Harassment includes anyone or more of the following unwelcome acts or behavior (whether directly or by implication), namely:

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

Thus, sexual harassment is a serious offence as it violates women's right to equality and dignity. The Sexual Harassment Act, 2013 thus, is remarkable bedrock to protect women's respect in workplace and to ensure safe working space's for them. Successful enforcement of the Act would lead to the realisation of their right to equality between men and women, life and liberty, and equality in working conditions everywhere.

The sense of safety at work will improve the participation of women in work, resulting in their economic empowerment and inclusive growth.

Background of the POSH, 2013 Act:

This Act has a brief history. As a result of few incidents, finally in 2013 the Act came into being. Although, Indian Penal Code covers sexual offences like physical assault and molestation yet many aspects of sexual harassment have not been covered by the Code. To protect the women's life, liberty, dignity and equality in workplace there was need for a strict law. an act was urgent need to deal with the situation more stringently. In India, the framework for the Sexual Harassment at Workplace law was laid down in the landmark judgement of the Supreme Court in Vishaka v. State of Rajasthan (1997). The landmark judgment of the Supreme Court in Vishka v. State of Rajasthan (1997) laid down the foundation of Sexual Harassment of Women at workplace in India.

A programme to curb the evil child marriage was initiated by the Government of Rajasthan in 1992 (GOI, Ministry of Women and Child Development 2015). Bhanwari Devi as a *Sathin* (friend) was engaged by the Government to work towards the prevention of child marriages in the state. She prevented the marriage of a one-year-old girl in her community during the course of her work. In revenge she was gang raped by five persons. This incident highlighted the extents of sexual harassment of women in the workplace. It struck a chord with the country and exposed the risks in the workplace facing working women. Accordingly, the Supreme Court set out guidelines and issued instructions to Union of India to lay down laws to combat sexual harassment in the workplace. Based on the facts of the Bhanwari Devi case, a PIL was filed before the Supreme Court of India by Vishaka and other women's groups against the State of Rajasthan and the Union of India. The judgment accepts and describes for the first time sexual abuse of women at work. In2007, Krishna Tirath, the then Minister of Women and Child Welfare, introduced a bill to protect women from sexual abuse

on the workplace (Bhat & Deshpande, 2017). The bill was approved by the Union Cabinet in January 2010 and was put before the Lok Sabha in December 2010. The formulation of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) was thus motivated by these guidelines. In 2012, the Cabinet made an amendment in the bill and reintroduced in the Lok Sabha. In September of the same year, the bill was passed by the Lok Sabha and was placed before the Rajya Sabha. The bill was passed by the Rajya Sabha in February, 2013 and to give a final shape of the bill it received the assent of the President in April 2013. Finally the bill came into force on December 9, 2013 as the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act as notified by the Indian Ministry of Women and Child Development.

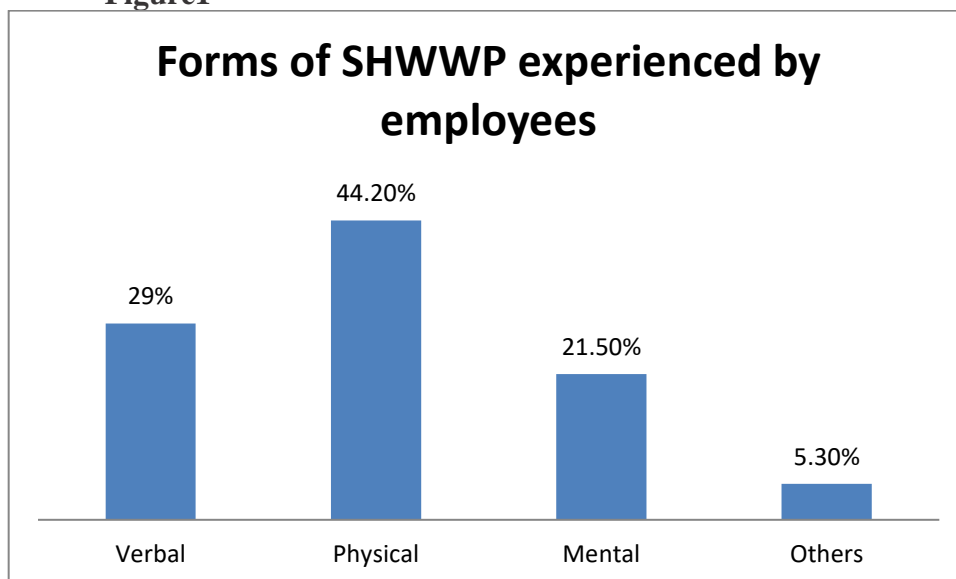
Sexual Harassment of Women at Workplace and Assam:

Assam, one of the eight Northeastern states situated south of the Eastern Himalayas is traditionally an agrarian society. This state is the largest state in the region in terms of population and second to Arunachal Pradesh in the geographical area. Despite its rich natural resources and culture, the state is lagging behind the rest of the country. The state is inhabited by multicultural, linguistic-religious ethnic groups of people. The region is industrially less developed with comparison to most of the states of India. Women's workforce participation in the formal sector is also comparatively lower. The state's female literacy rate is 67.27, which is above India's average female literacy rate of 65.46 (Census, 2011). NSO survey (2017) again shows that the Assam literacy rate for women is 81.2 per cent while that of India is 70.3 per cent. The *State of Indian Women: Report 2001-02* released by the Union Ministry of Human Resource Development revealed that the crime rate in the state against women is higher than the all-India average. According to National Crime Records Bureau (NCRB), Assam recorded the highest rate of total crimes against women in 2017. According to a report of the National Crime Records Bureau (NCRB), 2019, Assam has topped the chart of crime against women in the country for the third consecutive year. In a report published in 2020 by National Crime Records Bureau (NCRB) reveals that Assam has the highest crime rate against women, which is about three times more than the national figure.¹ Thus, the status of women is paradoxical in the state. At one hand the female literacy rate is higher than the national female literacy rate in the state; on the other hand the crime rate against women is more than that of the national figure. It is difficult to find data on women in the state workforce. An unpublished survey conducted by NEN in 2017 found that in organised sectors like the tea industry, where women constitute more than 50% of the workforce, they suffer from multiple layers of discrimination within the exploitative power structures of the industry. Sexual harassment of women is reported to be rampant in the tea estates of Assam (Workplace Safety and Dignity for Women in Assam, 2019). With the increase in women participating in the workforce, sexual harassment of women in workspaces has become increasingly prevalent in the state (Dey, 2013). According to Assam Human Development Report (2003), the state lagged behind Manipur, Meghalaya, Arunachal Pradesh,

Mizoram and Nagaland. According to the Assam Human Development Report (2014) the total unemployment rate is estimated at 13.4 percent. The female unemployment rate is found to be 33.9 percent compared to 8.0 percent in case of male.

Surprisingly, the sexual harassment in the workplace in Assam has not yet been extensively studied. After rigorous investigating to avail data on the sexual harassment in workplace in Assam, I found one research work collaboratively carried out by the Department of Women Studies, Gauhati University and North East Network, Assam in 2019. The research shows a deplorable situation with regard to the protection and dignity of working women in Assam. This study reveals that one of the reasons of sexual harassment in workplace was the prevailing unchallenged male privilege. In the workplaces of Assam, it revealed the rampant presence of 'quid pro quo.'

Figure1



Source: Workplace Safety and Dignity for Women in Assam, 2019.

Figure 1 shows the different types of sexual harassment faced by employees. According to this figure, physical harassment occurs in the highest number, which is 44.2 percent. Physical harassment implies unwanted physical contact and advances in the workplace. Next to physical harassment is verbal harassment, which comprises 29 percent. Mental abuse was recorded by 21.5 percent, which was related to hostile work environments or various types of explicit sexual overtures.

Table 1: Awareness of the Sexual Harassment Act, 2013

Employers			Employees		
Aware	Not aware	Partially aware	Aware	Not Aware	Partially aware
51.8%	28.4%	19.8%	38.2%	46.9%	14.9%

Source: Workplace Safety and Dignity for Women in Assam, 2019.

As per the Act, employers must make their workers aware of the provisions of it.

This report shows that 51.8 percent employers were aware of the Act in contrast to 38.2 percent employees. Most workers, however, knew about the Act through their own efforts. The 19.8% of employers and 14.9% of workers who claimed to be partially aware of the SH Act just knew the name of the Act and no further information. One of the noticeable findings of the report is that almost half of the employees were not aware of the Act, whereas 28.4 percent employers also did not know the Act.

Table 2: Display of Information about SH

Employers			Employees		
Yes	No	Not Sure	Yes	No	Not Sure
6.3%	93.7%		7.7%	88.7%	3.6%

Source: Workplace Safety and Dignity for Women in Assam, 2019.

Another key feature of the Act is to display the information regarding the penal consequences of sexual harassment at the workplace. However, the report presents a sorry picture. There was no displayed of information at the workplace, said 93.7% employers and 88.7% workers.

Table 3: Perception of Occurrence SHWWP

	Yes	No	Not Sure
Employers	9	83	8
Employees	41	59	

Source: Workplace Safety and Dignity for Women in Assam, 2019.

The study reveals that, 83 percent employers dismiss the occurrence of sexual harassment at the workplace. They are of the view that workplaces are free from any form of sexual harassment. On the other hand 41 percent employees admitted to witnessing some forms of sexual assault at their workplace.

This study shows that, due to two reasons employees do not register a case of sexual harassment. The employer's desire to preserve the organisation's reputation and reluctance on the part of the employee because of the lengthy process of inquiry and fear of losing her job. Female employees do not like to report SH incidents fearing repercussions for the family or the job. Another probable cause identified by the study team is the general atmosphere of tolerance of SH as something normal and the respondents' consequent belief that their workplaces are free from sexual harassment, as long as sexual assaults and molestations do not occur. Another thing noticed during the FGDs was that participants unanimously believed in the existing power hierarchy in the system and feel disempowered to complain.

Table 4: Existence of Complaints Mechanism vs. Complaints Received

Existence of Complaints Mechanism			Complaints Received by the Employers		
Yes	No	Not Sure	Yes	No	Not Sure
28.8	68.9	2.3	2.7	97.3	

Source: Workplace Safety and Dignity for Women in Assam, 2019.

This research also shows that the majority of employers and workers were not knowledgeable about the grievances process. In fact, 68.9 percent of the offices did not have a complaint mechanism to address SHWWP. Without a system for grievances, the employers cannot know if SHWWP exists or take appropriate actions. In the absence of complaint mechanism the study revealed that an

overwhelming 97.3 percent employer did not receive any complaint from women workers. The report also indicates that 71 percent of the workplaces did not adopt any measure to prevent SHWWP; while only 14.9 percent employers adopted certain preventive measures.

Due to fear and stigma, most of the women do not report or share the violence of sexual harassment faced by them. Moreover, the workplaces do not have favourable environments for the women to freely and fearlessly share and report instances of violation. There is lack of gender sensitisation programmes for employers and workers in the workplaces. The research provides a remarkable finding that 90% women do not know about the procedures for officially lodging a complaint. The report has shown that, over 55 percent of women did not share the sexual harassment at the workplace with their colleagues and supervisor citing mental pressure as the major reason for this. The main challenges for women to report incidents were fear and stigma. The other reasons for not sharing the cases were due to the losing one's dignity, losing of jobs or facing others forms of hostile working environment.

The report displays another striking findings, which is 52% of the respondents who faced SHWWP were aware that they can complain about sexual harassment of women at the workplace, but only 10 percent of them actually went on to lodge their complaints with workplace authorities. The reasons for not lodging complaints were. The reasons for this could be their lack of knowledge about the complaints mechanisms, absence of ICs or fear of stigma. The report came up with an inference that women think of lodging complaints only in the case of extreme sexual offences like molestation and rape.

According to the study due to certain reasons the aggrieved women do not want to register a case. One such crucial reason is the lengthy process of inquiry and fear of losing their job. Another reason is employers desire to preserve the reputation of the organization. Moreover, female worker do not like to report sexual harassment fearing consequences for the family or the job. One more reason is the aggrieved women feel disempowered to complain and they believe that perpetrators who have financial means can evade justice.

The SH Act mandates employers to set up complaint mechanisms, establish Internal Committee display information about the Act to prevent sexual harassment of women at workplaces. Members of ICs must be aware of the gendered nature of sexual harassment at workplace and their impact on women if they are committed to rendering justice and preventing sexual harassment of women. But in most of the cases studied, employers were either not aware of the provisions of the SH Act or have taken the obligation to set up complaints mechanisms lightly.

Even after the circulation of the SH Act by the government, many government departments did not form Internal Committees for prevention of sexual harassment because they have never received any reports of SHWWP. Of the few workplaces that had ICs in place, most had less than the mandatory seven members on their committees. The

biased attitude towards the complainant woman is the first barrier and as a result offenders enjoy impunity. Women are socialised to keep silent about incidents of sexual harassment to protect the so-called honour of family, workplace, employer and the aggrieved woman herself. Those who raise their voices are vilified and

subjected to further harassment in the highly masculine work environments. The study reveals that there is a general level of tolerance and normalization of sexual harassment of women in workplaces.

The role of the state is pivotal in the prevention of SH and redress. The study claimed that government officials were either ignorant or showed a lackadaisical attitude towards the mandate of the Act. The nodal agency for the SH Act in the state, the Social Welfare Department (SWD), suffers from a lack of clarity about its own role as a monitoring mechanism. The nodal agency is also mandated to form Local Committees (LCs) at the district level but these are far from fully achieved in Assam. Hence, as the study shows, the monitoring mechanism in the state is in poor shape; the pendency of an inquiry is checked only when a written complaint is made by the aggrieved woman to the Internal or Local Committee.

Conclusion:

Women play a significant role in the country's development through their economic support, domestic activities and also through their emotional attributes. Therefore they need a secure and safe workplace. Besides the presence of several social, legal and constitutional legislations this social evil is highly increasing day by day. Sexual harassment results in violation of the basic fundamental rights of women especially right to equality under article 14 & 15 of the Indian constitution and her right to life and to live with dignity under article 21 of the constitution. Besides, India is the signatory of the United Nations Convention on the Elimination of all forms of Discrimination against Women (CEDAW), which was adopted by the UN General assembly in 1979. It is often known as the international bill of human rights for women which advocates for the equality of women and men in terms of human rights and fundamental freedoms in the political, economic, social, cultural and civil spheres. Hence, India is firm determined to protect the freedom and dignity of the women in every spheres of their life including sexual harassment at the workplace. This is more evident when the country passed the POSH Act 2013 to protect women's dignity at the workplace. However, it is lamentable to say that along with the increase rate of women workforce participation the sexual harassment of women at the workplace has also been increasing with time. Although the Indian Government is trying to put an end to the evil practise of workplace sexual harassment, it is a long way to get the achievement. Workplace sexual harassment affects the social and psychological behavior of the women within and outside their workplace, and it also hinders the productive outcome of them. So as to curb the women sexual harassment at the workplace along with the government the employers and the employees have to be aware of sexual harassment and its implications. The monitoring agencies should always work as a watchdog. In any organisational setup wether it is governmental or private, internal complaints committee and grievance cells should be set up to monitor the cases of sexual assault. To create awareness among the employers and employees seminars, workshops, mock drills should be organized by the competent authority. Maximum job opportunities and higher positions for women in the organizational set up will empower women within and outside the workplace which in turn will help to eradicate this evil practise of sexual harassment at workplace.

Reference:

- Bhat, R. A., & Deshpande, A. (2017). An overview of sexual harassment of women at workplace in India: An analytical study. *International Journal of Innovative Research in Science, Engineering and Technology*, 6(7), 14361-14369.
- Department of Women Studies, Gauhati University & North East Network. (2019). *Workplace safety and dignity for Women in Assam*.
- Desikan, S. (2018, august 28). Toxic silence. *The Hindu*. <https://www.thehindu.com/opinion/op-ed/toxic-silence/article24794597.ece>
- Dey, Paramita. 2013. 'Sexual Harassment at Workplace: An Empirical Study to Understand Through the Lenses of Working Women of Guwahati, Assam, India'. *IOSR Journal of Humanities and Social Sciences* 8(6): 77-82.
- Doss, E. N., & Mukherjee, P. K. (2014). A study on sexual harassment among women workers at Workplace in Velor City. *Indian Journal of Applied Research*, 4(12), 35-37. [https://www.worldwidejournals.com/indian-journal-of-applied-research\(IJAR\)/special_issues_pdf/December_2014_1418820895__12.pdf](https://www.worldwidejournals.com/indian-journal-of-applied-research(IJAR)/special_issues_pdf/December_2014_1418820895__12.pdf)
- Evans, R. J. (1980). The history of European Women: A critical survey of recent research. *The Journal of Modern History* 54(4), 656-675. <https://www.jstor.org/stable/1881310>
- Govt. of Assam . (2003). Women: Striving in an Unequal World. *Assam Human Development Report*. Planning and Development Department. http://hdr.undp.org/sites/default/files/india_2003_en.pdf
- Govt. of India. (2011). Census Report. Office of the Registrar General and Census Commissioner.
- Gutek, B. A. (1992). Understanding sexual harassment at work. *Norte Dame Journal of Law, Ethics and Public Policy*, 6(2), Article 4. <http://scholarship.law.nd.edu/ndjlepp/vol6/iss2/4>
- Hazarika, Anurita P. and Asmita Basu. 2014. *Using Law to Address Sexual Harassment against Women in the Workplace in India: A Guide for Working Women*. North East Network.
- Jowett, B. (1885). *The Politics of Aristotle (trans.)*. Oxford, Clarendon Press.
- Kalita, P. (2019, October 22). Rate of crime against women highest in Assam in 2017: NCRB. *The Times of India*. <https://timesofindia.indiatimes.com/india/rate-of-crime-against-women-highest-in-assam-in-2017-ncrb/articleshow/71710059.cms>
- Mahapatra, A. (2018). Gender equality and ancient Indian culture: A study. *International Journal of Humanities and Social Science Invention*, 7 (8), 22-26.
- Mallapur, C. (2018, October 15). #MetooIndia: 54% rise in sexual harassment reported at workplaces between 2014-17. *IndiaSpend*. <http://www.indiaspend.com/metooindia-54-rise-in-sexual-harassment-reported-at-workplace-between-2014-17/>
- Ministry of Women and Child Development. (2015). *Handbook on sexual harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013*. Government of India.
- North East Network. (2015). *Unheard: Domestic violence in rural Assam*.
- Pandey, P. (2015, November 27). Sexual harassment cases at workplace more than double in 2014. *The Hindu*. <https://www.thehindu.com/business/sexual-harassment-cases-at-workplace-more-than-double-in-2014/article7924191.ece>
- Pegu, A. (2015). Female workforce participation in North-Eastern Region: An

- overview. *International Journal of Humanities & Social Science Studies*, 1(4), 154-160.
- Pratin Bureau. (2020, October 6). Assam records highest crimes against women: NCRB. *Pratidin Time*. <https://www.pratidintime.com/assam-records-highest-crimes-against-women-ncrb/>
- Press Information Beau, Government of India. (2019, February 8). *Cases of sexual harassment including sexual harassment at workplace*. Ministry of Women and Child Development.
- Rajkumar, M. (2018, March 8). *The history behind sexual harassment at the workplace law*. Nyaaya. <https://medium.com/nyaaya/the-history-behind-sexual-harassment-at-the-workplace-law-33f378af66be>
- Ramaswamy, S. (2018). *Women in political thought: The quest for gender equality and beyond*. Orient Blackswan.
- Sen, P., Borges, E., Gaullar, E., & Cochran, J. (2018). *Towards an end to sexual harassment: The urgency and nature of change in the era of #Metoo*. United Nations Entity for Gender Equality and the Empowerment of Women (UN Women). <https://www.unwomen.org/en/digital-library/publications/2018/11/towards-an-end-to-sexual-harassment>
- Smalensky, E., and Kleiner, B. H. (2003) 'How to prevent sexual harassment in the workplace'. *Equal Opportunities International*, 18 (2/3/4/), 3-7