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BEYOND STATUTES AND SILENCE: GENDER, LAW, CULTURE AND PRECARIETY IN A SOCIO-LEGAL ANALYSIS OF SEXUAL OFFENCES AND WOMEN'S ACCESS TO JUSTICE IN GOA'S UNORGANISED SECTOR

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ABSTRACT

Sexual violence against women in India persists despite constitutional guarantees, criminal-law reform and workplace-harassment legislation. This socio-legal study examines how these protections operate for women employed in Goa's unorganised economy, where domestic workers, daily-wage labourers, construction workers, market vendors and tourism-service workers often lack written contracts, social security and accessible grievance forums. Using secondary evidence from NCRB, Goa Police/media reports, PLFS and institutional sources, together with a structured questionnaire administered to 323 women workers across North and South Goa, the paper analyses direct exposure to sexual violence, witnessed workplace violence, fear of future victimisation and turnover intention. Exploratory factor analysis, Confirmatory factor analysis and Structured equation modelling indicate that witnessed workplace violence is a significant predictor of turnover intention and that fear, retaliation, stigma and weak Local Complaints Committee outreach continue to restrict reporting. The paper argues that Goa's legal framework is normatively strong but operationally uneven, and recommends target legal-literacy campaigns, functional district-level complaint mechanisms, trauma-informed policing, stronger victim support and coordinated monitoring of informal workplaces.

KEYWORDS: Informal labour, Sexual offences, Workplace harassment, POSH Act, Bharatiya Nyaya Sanhita, Victim support, Legal awareness, Local Complaints Committee, Structural vulnerability, Goa Police.

1. INTRODUCTION

Laws form a reflection of the opinion of people, the needs of people and the will of people. The widest possible identification of law consists in classing it as any rule, any criterion of action, any rule, pattern, standard, by reference to which action, conduct is to be regulated and judged. The Indian civilization saw a strong inclination of violence against female and this tradition has seen its way down through generations. The trend still manifests in the developed societies as well as the underdeveloped societies. There was not much concern over violence against women twenty years ago. Gradually violence against women has gained recognition as a legitimate human rights issue. The aftermath of physical and sexual assault against women has been brought to light thanks to research.

The state is the principal agent of women's empowerment, acting primarily through policy and legislation. Policy refers to an overall programme of action, unlike legislation, that seeks to achieve a specific goal. Within any democratic polity, governmental statutes, developmental strategies, and operational initiatives have consistently accorded primacy to the progressive advancement of women across all life stages. The Indian state has enacted a formidable corpus of legislative measures designed both to guard women against systematic disadvantage and to foster their full empowerment within the social and economic sphere. As the modern world became more globalized and commercialized, the position of women deteriorated, and women became a victim for outsiders. Rapes, gang rapes, acid attacks, sexual harassment at workplaces, Pornography, etc. became frequent crimes of the 21st century. Notwithstanding the constitutional and legislative frameworks ostensibly safeguarding women's rights, India remains beset by persistent sexual violence, the burden of which disproportionately falls on workers in the unorganised economy. National Crime Records Bureau statistics, corroborated by recent field research, reveal those informal settings like domestic work, construction, street vending, and the hospitality trade escape rigorous regulatory oversight and are devoid of binding, effective grievance mechanisms. The risks are intensified by economic dependency, scant awareness of legal rights, and recurrent institutional neglect (InvestIndia, 2024; Ungender, 2023).

Many people still believe that the law is difficult to understand and unavailable to the public. Legal rules must be broadly disseminated to be fully

effective, and enforcement authorities must go beyond their "institutional" mandates to include social dimensions. While there may be laws on paper, there is no assurance that women will have access to them or a better status because of them unless they are accompanied by enabling capacities. Before the legislative framework to effectively improve women's status, the intricacies of social institutions must be understood and handled. Proponents of a Uniform Civil Code frequently cite to women's purported advantages in achieving equality under the code as a justification for advocating Common Civil Code. However, these ostensible benefits contribute very little to women's advancement.

Even though Indian Constitution recognizes women as inhabitants, it still struggles to ensure applicable rights and to grant them opportunity to have equal rights in various forms, so having said that, it is only time that will be able to assess how well constitutional values and aspirations have been achieved in current scenario. As premier organization devoted to protecting female rights, the National Commission for Women substantiated in the year 1992 has been working tirelessly to provide justice to downtrodden sections of society. It has evaluated and suggested changes to various laws relating to women. Recent legislative developments have significantly altered the Indian criminal justice framework with ratification of Bharatiya Nyaya Sanhita (BNS), 2023 superseding Indian Penal Code. Also, BNS articulates provisions that eschew gender specificity, elevates the minimum penalties prescribed for sexual offenses, and corresponds with international standards regarding the protection of children and the notion of consent (Ministry of Home Affairs, 2023). The core adjustments outlined above are buttressed by concurrent legislative initiatives the Bharatiya Nagarik Suraksha Sanhita and the Bharatiya Sakshya Bill – that together seek to accelerate the cadence of criminal inquiries, embed the digitisation of evidentiary materials, and place protocols attentive to victim needs at the forefront of procedural design (LegalEye, 2025).

The Sexual Harassment of Women at Workplace Act (POSH) of 2013 embodies an aspirational reform yet falters in its on the ground efficacy within the informal economy. Drafted amendments now under public discussion propose extending the timeline for lodging complaints, dispensing with obligatory conciliation, and instituting quasi-judicial tribunal bodies (KelpHR, 2024). Notwithstanding the conceptual merit of these revisions, they remain

inert at the juncture of practical enforcement, primarily due to low awareness among the labouring poor, especially women operating in episodic and unprotected work frames. Located within this evolving legal and socio-political terrain, the present study concentrates on Goa as a strategically illuminating microcosm that reveals the national failure to safeguard women in informal employment from sexual abuse.

1.1 Background of the Study

Violence against women continues to be a worldwide crisis particularly rooted in socio-cultural dynamics and further complicated by inadequate legal and institutional responses. In India, the legal system concerning violent acts against women continues to develop, however, the implementation of such laws remains woefully inadequate, particularly in the case of the informal sector. One of the key examples is the state of Goa which boasts a thriving tourism economy. Goa's unique position makes it indispensable for examining the legal protections available to women workers in the informal sector, which consists of domestic workers, street vendors, and hospitality workers. These employees have no official employment contracts, no social security, no company policies for handling grievances, and disproportionate exposure to various forms of sexual violence. Like many developing countries, India faces the challenge of integrating a large informal economy, a large part of which is made up of women, particularly those in poor and insecure employment. These employees are poorly protected and face disproportionate violence and abuses with no means of reporting.

The absence of recognition of one's rights and fear of victimization and/or losing one's means of earning a living contribute to silence and a culture of impunity. This study will focus on the obstacles to the effective legal protection of women in informal economy in Goa and the insufficient enforcement and institutional support as part of the mechanical system. The study attempts to understand the legal context and the realities of women in informal economy to understand the critical shortcomings of the system and recommend practical measures necessary for the improvement of legal protection and providing justice to the sexual violence survivors in this marginalized population."

1.2 Sexual Offence: An Overview

Unlike certain other legal systems, Indian codified law does not present a single,

comprehensive statute enumerating sexual offences. The category encompasses a variety of acts that violate bodily autonomy, dignity, and personal integrity. For more than a hundred years, such violations were prosecuted under the IPC of 1860. However, the previous ten years have seen a systematic reorientation of legal terminology and structure towards emerging social norms and constitutional directives. The BNS revised the conceptual, procedural, and punitive frameworks governing sexual crimes in the country. The 2023 statute introduces altered definitional parameters, modifies evidentiary thresholds, and re-evaluates sentencing maxima, all aimed at a more attuned and efficacious attitudinal and institutional response to the experiences of survivors while upholding the coherence of the legal order.

Under the auspices of BNS framework, sexual offences undergo reclassification designed to improve analytical accuracy, to centre the requirements of victims, and to incorporate gender neutrality in specified conditions. Section 63 of BNS defines the offence of rape, prescribing baseline custodial penalty of 10 years, which may ascend to life imprisonment or death penalty in circumstances of special gravity, notably in offences against minors. The legislation now unequivocally criminalises spousal rape when the wife is under the age of 18; however, the broader exception for spousal rape involving adult women remains intact, a provision that continues to polarise advocates of gender justice (Ministry of Home Affairs, 2023).

The definition of sexual offences has been elaborated to encompass a sequence of behaviours including:

- Spectrum of violations against bodily autonomy, including both penetrative and non-penetrative acts;
- Sexual harassment in its various forms – verbal, physical, and mediated through electronic means;
- voyeuristic acts, stalking, and unlawful disrobing of individuals;
- Trafficking of persons and their sexual exploitation without consent;
- Offences involving sexual conduct directed at minors, now expressly harmonised with the statutory framework of (POCSO) Act.

Concomitant with this doctrinal evolution is Bharatiya Nagarik Suraksha Sanhita of 2023, which supplants Indian Criminal Procedure code. The Sanhita prescribes an impermissible ceiling of 60 days for the completion of investigative activity and an additional 45 days within which adjudicatory

processes must be advanced in cases of sexual offences. The Bharatiya Sakshya Adhiniyam (2023) complements this scheme by broadening the admissibility framework for electronic and digital evidentiary material, thereby facilitating the legal recourse of complainants across both urban and rural demographics (LegalEye, 2025).

Moreover, contemporary legal principle firmly insists that consent must be understood as an explicit, affirmative manifestation of will, negating any inference from the mere lack of violent opposition. Indian courts have consistently interpreted this standard in a manner that centres the survivor's perception rather than the alleged perpetrator's mindset, particularly in informal labour markets, where hierarchical vulnerabilities are magnified. The statutory evolution culminating in 2025 has produced an enhanced normative scaffold. Nevertheless, the on-ground realization of these safeguards is undermined by persistent judicial backlogs, social ostracism, underreporting, and the opaque nature of supervision in unregulated work environments.

1.3 Legal Proceedings and Constitutional Relevance in Goa

The term 'legal proceedings' denotes the process through which disputes and claims are settled through the court system and other legal avenues. In the case of informal economy, legal proceedings on sexual violence against women encompasses the entire spectrum of actions commencing from the filing of complaints to the case's investigation, prosecution, and court decision. These proceedings are aimed at addressing the gap which sexual violence survivors face in the enforcement of legal constructs pertaining to the accountability of sexually violent offenders. These proceedings also encompass the filing of First Information Reports (FIRs), the collection of probative materials, legal case prosecution, and the reception of enforcement judgments or orders. Still, in the informal sector, numerous women experience almost insurmountable obstacles in obtaining legal services including the absence of recognition of one's civil rights, apprehension of backlash, and the cold indifference of the police and other legal authorities. This section analyses the difficulties that women in Goa endure in the pursuit of justice, particularly in the informal sector which, in many ways, is bereft of legal cover.

Goa being distinguished as the Indian state for the enforcement of Uniform Civil Code, which subjects all residents to the same civil legal

framework, irrespective of religious identity, in respect to marriage, divorce, succession, and property entitlements. This legal homogenisation did not arise from any reform initiated after Independence; rather, it derives from the survival of the Portuguese Civil Code of 1867, which was enacted during colonial rule and retained by the Goa, Daman and Diu Administration Act of 1962 following Goa's incorporation into the Indian Union (Rodrigues, 2020). The Goan Civil Code operates independently of religion-based personal laws that prevail in most other parts of India. While elsewhere in the country Hindus, Muslims, Christians, and Parsis are bound by separate legal regimes governing personal matters, the residents of Goa—irrespective of their faith—adhere to a unified civil code. For instance, under this framework a Muslim husband in Goa may not take multiple wives, and the law posits that all spouses jointly own their property unless they have beforehand contracted a separate property regime (Fernandes, 2022). The code moreover confers identical inheritance entitlements upon sons and daughters, thereby advancing civil legal parity between the sexes.

Goa's judicial structure includes district and sessions courts together with subordinate trial courts. The Bombay High Court's Goa Bench, seated in Panjim, exercises High Court jurisdiction in the state, given the absence of a separate High Court for Goa. Over the years, the Goa Bench has delivered a significant body of jurisprudence aimed for protection of female rights and personal dignity. The Portuguese legal legacy remains woven into Goa's jurisprudence but is marked by persisting difficulties. Although the code embeds gender-neutrality and preserves the autonomy of the will, the texts themselves are still largely in Portuguese. Awareness and operational grasp of these tenets fluctuate, particularly in the state's rural hinterlands (D'Silva, 2023). Goa's Uniform Civil Code regained prominence after a decisive Supreme Court ruling in *Jose Paulo Coutinho v. Maria Luiza Valentina Pereira* (2019), which deliberated succession under the Goan Civil Code. Upholding norms of equal distribution among heirs, the Court confirmed that the state had, in fact, realised a civil normatively uniform regime valid across confessional divides. The judgment remarked, "Goa is a shining example of an Indian State which possesses a Uniform Civil Code applicable to all, irrespective of religion, while admitting limited exceptions" (Supreme Court of India, 2019).

The judicial pronouncement confirmed Goa's unique constitutional position and simultaneously revived discussion at the national level concerning

the relevance of Article 44 of Indian Constitution, which directs state to promote the establishment of Uniform Civil Code applying uniformly to all citizens. In parallel with Goan Civil Code, the territory administers a cohesive legal apparatus that harmonizes with national statutes while simultaneously embedding tailored administrative mechanisms. Goa has adopted the newly promulgated the 3 laws which collectively delineate the corpus of substantive law, procedural law, and evidentiary directives. In conjunction with this national framework, the state has promulgated its own Victim Compensation Scheme, which was amended in 2022 to furnish financial and psychological services to survivors of sexual offences, acid attacks, and an array of other violent offences. Goa further gives effect to Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, through the establishment of Local Complaints Committees at the district echelon; however, the effectiveness of these committees in the informal economy has exhibited considerable variability (Government of Goa, 2023).

1.4 Understanding the Unorganized Sector and Women's Vulnerability

The International Labour Organization (ILO) describes informal employment as a form of work marked by meagre pay, irregular hours, and no access to recognised legal or social protections. In India, the unorganized sector comprises diverse informal economic activities that remain unregistered under statutory labour frameworks, do not establish formal employer employee linkages, and function outside the jurisdiction of social safety nets. Data derived from the Periodic Labour Force Survey for 2022–23 indicates that over 90 per cent of national labour force is absorbed in the informal economy. Although many of these workers are men, the participation of women—especially in domestic, caregiving, and informal services—remains disproportionately underreported, producing an unrecognised demographic that skews national statistics (Invest India, 2024). Goa's tourism economy reveals the unorganized sector in stable growth: behind the glossy brochure images of azure beaches, unpaid guesthouse workers fix linen in silence, street vendors navigate eking margins behind colourfully stacked seasoning, and migrant women scrub floors in quiet multiplicities of domestic time. The recently released e-Shram portal data for 2023 catalogue these unresolved lives, showing that female registrants account for 47% of nearly 250,000

informal workers from the state. This figure, underscored by the Goa Labour Department's latest report, speaks less of numeric than of precarious radialities—each registrant holds not just a card, but a constellation of risks tied to seasonal tourism cycles, uprooted housing, and day's wage docks of a cash economy.

Despite Goa's elevated per capita income and relatively favourable development indices, its informal female labor force remains *de jure* invisible and *de facto* structurally marginalized. Many of these workers lack: formal employment contracts, access to grievance redress mechanisms such as Internal Complaints Committees (ICCs) or Local Complaints Committees (LCCs), social security entitlements—namely, Employees' State Insurance (ESI), Provident Fund (PF), and maternity leave—as well as regulatory protections extended under occupational health and safety legislation. The overlap of informality and gender produces a risk landscape in which women are disproportionately subject to sexual harassment, exploitation, and retaliatory violence. Several interrelated factors intensify their exposure: socio-economic dependencies exemplified by circumstances in which women are single breadwinners or transnational migrants—reduce their negotiation power; inadequate legal literacy constrains their ability to seek redress; societal stigmas that mark victims as blameworthy isolate them; and institutional responses, whether from police or employers, are typically minimal or absent (Sharma, 2023; Ungender, 2023).

Although the intention of POSH Act of 2013 is to protect workers across both the organized and unorganized sectors, implementation in Goa continues to falter. A compliance audit conducted in 2023 found that numerous talukas do not operate conscientious Local Complaints Committees (LCC), and that awareness initiatives are conspicuously absent in high-risk precincts, including Mormugao, Mapusa, and various parts of North Goa (Government of Goa, 2023). The predominance of informal employment dissuades women from lodging complaints, as they fear immediate dismissal and blacklisting by sub-contractors. Although Goa's 2022 Victim Compensation Scheme and establishment of Fast Track Special Courts ostensibly provide formal redress, their benefits rarely reach women outside the formal judicial pipeline. Domestic workers, for example, seldom lodge FIRs, impeded by the absence of procedural guidance and by a lack of social safety nets that might otherwise encourage reporting. The gendered precarity of the informal economy in Goa

foregrounds the imperative of aligning legal literacy with rigorous enforcement. In the absence of institutional reconfiguration and purposeful outreach frameworks, even legislation conceived with the best intentions—such as the BNS (2023) and POSH Act (2013)—risks failing to translate into effective justice for women situated in unorganised work.

1.5 Statement of the Problem

Goa women working in the informal economy continue to struggle with gross injustices of sexual violence, even with more advanced legislation such as the Criminal Law (Amendment) Act, 2013, as modified under the Bharatiya Nyaya Sanhita (BNS), 2023. Lack of formal job contracts, the unsatisfactory enforcement of the POSH Act, 2013, and ignorance of legal entitlement, as well as lack of employment opportunities, create barriers for women to seek legal intervention. Data provided by Goa Police and the NCRB, paint a picture of the alarming increase in sexual violence, while the reality of the situation is dominated by underreporting of such offences due to social stigma, a lack of economic autonomy, and a prevailing disregard for rape and sexual assault. Most alarming is the lack of will to report the rape, and the lack of a gender sensitive approach institutionalized by the police. Customary and dominant gender norms, exacerbated with mitigate a lack of will to address the issue in a proactive manner, of stark inhuman social injustices wrack and wreck the lives of women employed in the informal sector. This study then explores the legal, social and structural barriers to access and protection justice within Goa's informal labor sector.

1.6 Study Objectives

- Mapping the frequency and forms of sexual violence reported by women employed in Goas informal economic sectors.
- Documenting the demographic, cultural, and work-related characteristics that shape women's story.
- Tracing whether incidents are reported, and uncover the legal, social, and workplace obstacles that inhibit assistance.
- Measure how such offenses affect women's mental health, social bonds, and day-to-day earnings.
- Exploring how survivors interpret the motives of perpetrators and the responses or indifference of witnesses.
- Reviewing the adequacy and real-world presence of laws, policies, and support services in settings outside formal employment.

1.7 Literature Review

Laws for women's protection and development have been too many. At this instance, major criminal legislation must be scrutinized in respect to the key provisions that either directly pertain to or maintain an intimate link with crime against women. The nature and extent of this study call for a thorough and complete review of recent studies around protection of women from sexual assault in informal sector. Despite India having an age-old history of honouring women as divine forces, in the modern, multi layered society, women have been subjected to abominable conditions.

The current socio-legal examination, which was carried on in North Goa, examines street sexual harassment of women at informal places of public sphere, mainly, tourism hub and local market. Systematic underreporting, police indifference, and the lack of available grievance systems are documented by the authors through interviews by female vendors, domestic workers, and local police. Additionally, the research indicates that women harbor considerable distrust toward Local Committees established under the Prevention of Sexual Harassment (POSH) framework, primarily attributable to insufficient awareness of the mechanism and the pervasive dread of legal repercussions faced by victims in informal employment settings (Ali et al., 2023).

An empirical inquiry into workplace harassment within the informal Indian economy principally comprising domestic workers, street vendors, and construction labourers was undertaken by Human Rights Watch (2020). The study revealed that although Prevention of Sexual Harassment (POSH) Act has been enacted, its functional enforcement remains virtually absent. Respondents reported negligible access to Internal or Local Complaints Committees and articulated a pervasive fear of employer reprisal, including immediate dismissal, should they attempt to lodge a formal grievance. The study further identified that a status-quo ethos, embedded within informal workplaces, obstructs procedural enforcement and simultaneously perpetuates the routine normalisation of abuse.

Focusing on the South Asia region, the 2025 report by Equality Now and SAMAJ inquiries about survival oriented legal solutions accessible to the victims of sexual violence to reveal structural gaps regularly denying access to justice to the victims of sexual violence in informal settings. Such arenas of conflicts are excessive procedural structures, geographical impediments to the court locations, and insufficient community support. As a result, the

research identifies the need of including survivor based legal interventions, in particular, mobile law clinics, district paralegals, and trauma-informed procedures and emphasizes the specific importance of such interventions to marginalized women in Goa (Equality Now, 2025).

The paper by Sharma (2017) engaging in a critical review of Nari Adalats, which are community-based justice forums that are run by women collectives. Even though such forums provide timely redress and foster peer solidarity, such systems lack enforcement structures, and rarely do they coordinate with judicial systems of the state. They have limited presence in Goa hence limiting their intervention in cases of sexual violence faced by women in informal sectors (Sharma, 2017).

Venumuddala (2020) by Taking NSSO as the source, the paper reaffirms the fact that more than 90 % of working people in India are informal and women represent disproportionately low paid and precarious work. The analysis also associates informality with the lack of legal safeguards and legal awareness levels, which subsequently lower the formal reporting of gender-based violence among states such as Goa (Venumuddala, 2020).

Human Right Watch (2017) in their reports of institutional bottlenecks experienced by survivors highlighted in the field study of four Indian states include delays in medico-legal examinations, apathy of the police and congested courts. It is also importantly noted that survivors born in the rural or in the marginalized communities were least likely to access any legal assistance or the witness protection program, a step frequently resonated in the informal worker environments of Goa (HRW, 2017).

Albertina Almeida through (Herald Goa, 2023) openly shows the failure on the part of State to achieve due diligence in safeguarding women in Goa. She records delay in justice, incapacity of critical One-Stop Crisis Centres (OSCCs), inter agency coordination and underfunding of Local Committees as envisaged under POSH, factors that discriminate against the victims without a formal working status.

CPPR Workshop Report (2025) with input from a Goa Observer reported that in its 2025 policy workshop in Goa, there was substantial stated disbelief with the lack of coordination among players; NGOs, LCCs, police, judiciary and legal aid bodies. The report advocates for a single platform for survivors, setting up well-equipped legal aid clinics at taluka level and conducting mandatory awareness programmes, a plan to enhance institutional arrangements in the unorganized sector (CPPR, 2025).

(Lolayekar et al., 2022) studied district-level longitudinal analysis of crimes against women in India as a whole, as well as in other regions, including Goa. The panel indicates that low female literacy levels and socio-economic deprivation are major risk factors of increasing incidences and a decreasing rate of conviction. The paper points out that the districts dominated by the informal sector show lower rates of crime redressal, strengthening the obstacles women in the unorganized job market experience when acquiring justice.

Ram Pal Bidhuri (2016) defines that while many crimes are reduced thanks to the existing legal framework, there is still a spike in crimes, especially against women. Critical analysis relating to new governance practices is necessary while socially sensitive judgements are better than provisions outlined in penal provisions that can lead to ambiguity.

M. Waites (2010) signifies that there are questions about social conditions, awareness, activity, and reason, all of which will produce a stark divergence in the attitude to sexual offences. A radical vision of fixing the situation that symbolizes human rights and uniformity will result in a shift in the country's social structure.

A. Misra, S. Bronitt (2014) rationalised that there are laws that are outdated in regard to sexual offences which restrict access to the legal system by women. The fact that sex and gender-based savagery should be eliminated is due to modifications in sexual offences. The laws must be articulated in the view of effectively addressing the type and substance of the harm. A significant amount of progress in setting the law concerning sexual assaults has been made, but there are aspects of it where issues are unopened. Social and moral issues in our country also contribute to the effects of sexual offences to young women hence the need to have the effects of the law be more convinced. Our intention is to obtain a perspective as an effort to prove that the recognition of the existence of exploitation frustrates than balances the solemnity of sexual crimes.

The study of A. Raj and L. McDougal (2014) focused on the fact that In Indian society; there is a need to fight against the patriarchal attitudes which are typical of Indian judicial system and the difficulties of sexual assault trials. According to scholars, men and boys should be taught on how to treat women and their sexuality as well as the human rights when it comes to sexual entitlement.

Kumar. S and Schmuhl. M.A. (2019) noted that there is a plethora of contributing factors to

inclining rates of sexual violence in India. The legal system, according to some experts, adds to existence of sexual violence since it gives criminals a false sense of impunity and security against the law, the political world, and the legal community.

2. LEGAL FRAMEWORK GOVERNING PROTECTION OF WOMEN AGAINST SEXUAL OFFENSES

Legislative safeguards for women confronting sexual violence in India have deepened markedly over the preceding decade, most conspicuously through the introduction of BNS, 2023 alongside complementary amendments to criminal procedure code and the body of laws regulating workplace conduct. The present section delineates the principal instruments governing sexual offenses and measures for the protection of women across institutional and informal employment spheres.

2.1 Provisions under Constitution

The Indian Constitution establishes a broad structural basis for confronting gender-based violence within its cluster of fundamental rights. Article 14 enshrines the principle of equality before the law; Article 15 explicitly forbids discrimination on grounds of sex. Article 21 secures right to life and personal liberty; a guarantee that courts have progressively interpreted to encompass personal dignity and bodily autonomy (Sharma 2023). Over successive pronouncements, the Apex Court has recurrently invoked these articles to invalidate regressive patriarchal norms and to widen the protective envelope surrounding women, including those who have endured sexual assault.

2.2 *Bharatiya Nyaya Sanhita (BNS), 2023*

The 2023 enactment of Bharat Nyaya Sanhita (BNS) superseded the IPC on 1 July 2024, effecting substantial alterations in the categorisation and sanctioning of sexual crimes. Section 63 of the BNS establishes a base custodial sentence of one decade for the offence of rape, escalating to life confinement or capital punishment for aggravated cases, particularly those involving minors below age 16. Furthermore, the BNS adopts a gender-neutral lexicon for specified offences, including sexual assault of minors and trafficking, thereby broadening the legal nexus to encompass all potential victims and perpetrators (Ministry of Home Affairs, 2023). Crucially, the present formulation of consent adheres to the evolving jurisprudential understandings previously articulated by the courts, while simultaneously

mandating the penalization of marital rape where the victim is a girl below 18 years. The legislative omission is a comparable provision for married adult women, however, allows the marital rape exception to endure, thus perpetuating contentious discussions regarding the intersections of gender justice and the principle of bodily autonomy (Shonee Kapoor, 2024).

2.3 *Bharatiya Nagarik Suraksha Sanhita (BNSS), 2023 and Bharatiya Sakshya Adhiniyam (BSA), 2023*

Alongside the BNS, the BNSS 2023, supersedes Criminal Procedure Code, while the BSA, 2023, replaces the Indian Evidence Act. Together, these enactments mandate time-bound adjudication of offences of sexual violence. The BNSS of 2023 underscores the normative significance of procedural justice across the spectrum of sexual violence litigation. Section 193 obligates law enforcement agencies to conclude the investigative phase of rape and sexual assault offences within a statutory period of 60 days. Complementarily, Section 262 prescribes a judicial timeline mandating the trial to reach finality within 45 days of the filing of the charge-sheet. Procedural safeguards that centre the victim's dignity and experiential reality—namely, in-camera proceedings, the assignment of women officers for testimony recording, and strict identity anonymisation—are not only retained but also expressly fortified (LegalEye, 2024).

The BSA, 2023, reconstitutes framework governing evidentiary admissibility, expressly incorporating electronic records, body-worn camera recordings, and digital correspondence—such as WhatsApp exchanges and e-mails—within the ambit of Section 61. This legislative calibration fortifies evidential infrastructure for prosecuting sexual offences, whether perpetrated in corporeal or digital domains. Crucially, Section 49 abrogates the erstwhile provision permitting the interrogation of a woman's sexual antecedents, thereby aligning Indian legal doctrine with contemporary, survivor-centred imperatives articulated in international legal scholarship (Kapoor, 2024).

2.4 *Judicial Developments on Informal Sector Protection*

The Indian judiciary has effectively broadened protective measures for women engaged in unorganized labor, despite the persistent enforcement deficits characterizing a deterrence of Sexual Harassment legislation. During the pivotal judgment of 2023 Aureliano Fernandes vs State of

Goa Appeal No. 2482 of 2014, Supreme court of India on May 12, 2023 determined that POSH Act covers women, regardless of employment status, and will, subject to rules and procedure, also protect domestic workers; Local Committee's cater to workplaces with no Internal Complaints Committee or complaints against employers. *POSH Act, 2013, ss. 2(a), 2(e), 6.* (Ungender, 2023). Further, the Madras High Court, in 2025, articulated that the evaluation of harassment must rest on the survivor's experience rather than the presumed intentions of the alleged perpetrator. This survivor-focused doctrinal shift not only harmonizes with the evolving contours of international human rights law, but also fortifies safeguards applicable to domestic workers, street vendors, and other strata of informal labor (IndianWorkingWoman, 2025).

2.5 Other Relevant Laws and Policy Instruments

A series of legally complementary enactments reinforce protective measures against promotional sexual wringing.

The Immoral Traffic (Prevention) Act of 1956 designates prostitution as a legal wrong whenever a person is subjected to exploitation for monetary gain. This formulation holds that whenever a woman or child undergoes physical exploitation and any individual facilitates that condition, the situation constitutes commercial exploitation, which the statute renders punishable. Sections 7 and 8 of the Act articulate trafficking as the sequence of enlisting, contracting, procuring, or otherwise engaging a person for purpose of commercial sexual exploitation. The Act is designed to prevent prostitution, to disrupt the unlawful trade, and to assign the culpable to protective custody within reformatory shelters.

The Information Technology Act of 2000 delineates corpus relating to computer-related offences together with corresponding sanctions, presenting a comprehensive framework for prosecutorial and punitive measures. Within the Indian legal landscape, its authority is pivotal, providing law enforcement and judiciary with instruments necessary to supervise and counter deviant electronic conduct. Against this procedural backdrop, however, the precision of definitional boundaries for cyber-crime and the procedural safeguards still demand refinement. The Information Technology (Amendment) Act of 2008 consequently emerged as a legislative supplement, amending the principal Act to close interstitial gaps and to harmonise its provisions with evolving

technological paradigms, thereby reinforcing deterrent capacities and procedural efficacy in both crime prevention and legal redress.

The Criminal Law Amendment Act of 2013 and its Integration under the BNS, 2023

The Criminal Law (Amendment) Act, 2013, which the government passed in response to the Nirbhaya case, created significant changes to the IPC, CrPC and Evidence Act. The legislation extended the definition of rape to include new sexual assault offenses, which cover various forms of sexual harassment and stalking and voyeurism and disrobing, while the law established higher punishment for these severe sexual assault offenses. The later BNS, 2023 does not simply 'integrate' the 2013 amendment; rather, it replaces the IPC from 1 July 2024 while retaining several core protections and reorganising them in Chapter V. The law defines rape through Section 63 which establishes punishment in Sections 64-66, while Section 70 explains gang rape punishment which includes enhanced penalties for cases involving survivors under 18 years. The legal analysis should therefore distinguish between the 2013 amendment as a reform to the IPC and the BNS as the current substantive penal code.

The BNS 2023 maintains its marital-rape exception for adult wives while it recognizes that sexual intercourse between a husband and his wife who is under 18 years old qualifies as rape. The BNS typically employs gender-neutral terminology for instances of rape according to the inaccurate statement which asserts this practice. The procedural timelines require accurate correction. The police force must finish their investigation work which pertains to specific sexual offences based on BNSS Section 193(2) including BNS Sections 64-68 and 70-71 and certain POCSO offences within two months after they record information. All inquiries and trials which involve particular sexual offences such as rape must finish within two months after the charge-sheet submission according to BNSS Section 346. The previous text establishes a 45-day trial period which lacks proper evidence.

The Indecent Representation of Women (Prohibition) Act of 1986 formally forbids objectionable presentation of women in advertisements, printed publications, illustrations, sculptures, films, and analogous forms of expression. The statute aims to suppress public exposure to distorted and vulgar portrayals of female bodies and identities, implementing penalties for such representations. The Act's wide-ranging terminology

captures not only visual and verbal inflections but also non-verbal cues, including gestures and symbols, thereby establishing a comprehensive regulatory perimeter around all potential modalities of visual and discursive communication.

3. RESEARCH METHODS

The research adopts a mixed-method approach which combines primary data collection and secondary data analysis. Researchers used a structured questionnaire to collect primary data from respondents in Goa who participated in the study of women's safety. The researcher used factor analysis to identify hidden variables from primary data which they tested with Structural Equation Modelling (SEM) to examine the relationships between these variables and prove the validity of their theoretical framework. Reliability and validity assessments were used to establish the structural model. The research used secondary data which included NCRB Crime in India reports and Goa Police/media-reported crime statistics and PLFS 2023–24 and MWCD/SHe-Box data sources. The research study used these data to establish the context of national and Goa-specific crime patterns and victims' vulnerability and women's workforce participation and institutional responses. The research design allows the study to integrate empirical survey findings with official data on crime and socio-economic indicators.

3.1 Crimes against women - GOA Police and NCRB

The table 1 presents secondary data which establishes a contextual foundation for studying crimes against women together with their institutional

responses in India through the specific case study of Goa. The NCRB 2023 data shows that crimes against women remain a significant national issue for India because there are 4,48,211 recorded cases and 29,670 reported rape incidents throughout the country. The Goa police and media of 2024 report criminal activity which shows that crimes against women increased from 288 cases in 2023 to 365 cases in 2024 together with 106 recorded rape incidents. The recent police and media reports from Goa provide current indicators which show local developments even though they should not be used as official state statistics confirmed by the National Crime Records Bureau.

The counterintuitive interpretation of the secondary data used as the source of many national and regional publications indicates an alarming trend concerning the sexual offences against women in Goa over the past few years. The 2023-24 PLFS data provide a new dimension of data on the labour market. Data show a rise in the national Female Worker Population Ratio (FWPR) of 40.3%, demonstrating an increasing level of economic activity by women. However, the structure of female participation demonstrates a continued approach to informal and insecure means of working. For the female working population, 58.4% of women are self-employed; 21.7% are regularly employed by the public or private sectors; and 19.8% are employed as casual/temporary workers in the informal labour market. These types of participation indicate that many women do not have a reliable or formally protected source of work. Therefore, it is likely that access to work rights, grievance processes, social security, and institutional protection may be impacted by the lack of reliable or formally protected work.

Table 1. Crimes against women - GOA Police and NCRB

Secondary data source	Latest usable figure / evidence	Relevance to the study
NCRB 2023 national crime data is the latest available NCRB issue	4,48,211 crimes against women and 29,670 rape cases reported in India	The report establishes its position by using national crime data which shows the pattern of crimes against women throughout India.
Goa Police / media-reported data, 2024	365 crimes against women in Goa in 2024, compared with 288 in 2023; 106 rape cases in 2024	The current Goa trend shows police and media reported data which police and media outlets documented as separate from NCRB data.
PLFS 2023–24	Female worker population ratio: 40.3%; self-employed women workers: 58.4%; regular wage/salaried: 21.7%; casual labour: 19.8%	Examines how labor market conditions affect women's vulnerability to economic hardship and their need to work in unofficial jobs.
SHe-Box / MWCD	SHe-Box launched on 29 August 2024; over 161,000 workplaces onboarded by 27 March 2026	Shows current institutional systems that handle workplace sexual harassment complaints while showing how that system tracks its operational status.

3.2 Legal Framework and Institutional Gaps: Absence and Lack of Protection and Awareness

Even with the implementation of the POSH Act (2013), the Criminal Law (Amendment) Act of 2013

and the 2023 Bharatiya Nyaya Sanhita have and continue to be important legal instruments to defend the rights of women, these legal frameworks have not been successfully implemented in Goa's informal economy, as the data indicates. Women,

workers in the informal sector, and have little to no understanding of the existence of Local Complaints Committees (LCCs), which is a direct violation of the POSH Act which mandates the establishment of LCCs in every district as a legal obligation, and equally, the frameworks of the law. There exists a ludicrous gap between the policies and practical action.

Moreover, concerning awareness on legal rights, these groups—domestic workers, street vendors, and workers in tourism—represent some of the most critical, though neglected, segments of Goa's informal economy. It is this lack of awareness which causes the victims of harassment to not even see it as a legal violation, let alone the steps needed to pursue legal recourse. Furthermore, shortcomings in the system's capabilities, a lack of competent personnel, sluggish probes, administrative hurdles, etc., are all significant factors in the lack of public confidence in the system of justice. Therefore, many women choose to remain silent for the fears of retaliation, loss of employment, or social ostracism.

The analysis highlights that police agencies do not seem able to implement survivor-focused mechanisms within the BNSS (2023) and BSA (2023) frameworks, including, for example, time-bound trials, in-camera proceedings, and anonymity provisions. As such, the laws which aim to empower women become, in practice, inaccessible, and instead, serve to sustain the very vulnerability that they intend to mitigate. The gathered evidence highlights that the primary issue is not the absence of legislation, but the failure of institutions and societal neglect, which demands an increase in legal awareness, community mobilization, and responsibility of the enforcing agencies.

3.3 Data and Sampling Characteristics

The cross-sectional study design was the quantitative research methodology used to collect the data using structured self-administered questionnaires among the sample population of women working in unorganized sectors in Goa territory. The success criterion behind the application of this method was the fact that it has captured the various forms of violence encountered in the informal working style, whereas the guarantee of confidentiality has been maintained. The instrument has been created because of the intensive screening of the validated scales in the field of similar studies regarding workplace violence (Akbolat et al., 2019). Scores on socio-demographic, physical or sexual violence caused by DVW and Witnessed VVW Scale, FFVEW Scale and

TI Scale were also present in the questionnaire.

The present study adopted a stratified purposive sampling design to achieve a nuanced representation of women engaged across a range of informal sectors in Goa. The sampling frame was stratified along two principal axes: first, geographic segmentation into North Goa and South Goa; second, the specific type of informal employment, including domestic work, construction, tourism-related services, agriculture, and fisheries. Stratification by geographic region permitted the research to identify salient regional variations in socio-legal support mechanisms and accessibility of institutional services. Concurrently, occupational stratification illuminated the heterogeneous vulnerability profiles attendant upon differing informal work categories, thereby enhancing the analytic depth of interview data.

3.4 Participants

In defining the sample population, purposive selection was employed to recruit participants who satisfied a clearly delineated set of eligibility criteria: adult women aged 18 years or older, possessing at least 1 year of uninterrupted participation in informal employment, and lacking formal employment contracts or statutory labour protections. The employed sampling design explicitly targeted unorganised workers who, by virtue of their employment setting, face systemic barriers that inhibit their access to justice and legal support. An initial enumeration of 384 cases, derived from Cochran's formula and calibrated to a 95 % confidence interval and 5 % error of sampling, yielded a final corpus of 323 useable interviews. This degree of recovery is deemed adequate for both exploratory data engagements and structural equation modelling, consonant with the study's analytic architecture and the validated dimensions of the measurement scales. The sampling protocol was calibrated to the underlying aim of delineating the institutional, social, and legal hindrances that women workers in the unorganised sector encounter, thus ensuring that the empirical evidence retains both situational pertinence and theoretical integrity.

3.5 Measurement Instruments

Direct Exposure to Sexual Violence (DVW): Direct Exposure to Sexual Violence was evaluated using a six-item scale adapted from established inventories of workplace harassment (Rogers, 1994). The scale probed whether participants had experienced unwanted sexual comments, non-consensual

touching, and coercive sexual solicitations in the course of their work. In addition, it included inquiries about exposure to pornographic materials, threats of job loss as a means of intimidation, and confirmed patterns of stalking or hyper-surveillance—factors which the literature links to direct victimization among vulnerable workforces. Participants rated their opinions on a five-point scale, thereby allowing for a nuanced assessment of both the frequency of events and the intensity of their impact.

Witnessed Workplace Violence (VW):The construct of Witnessed Violence was operationalized via a triadic scale designed to measure indirect exposure to sexual aggression within professional settings. The items solicited: (1) knowledge of comparable incidents directed at colleagues; (2) observation of departures provoked by sexual misconduct; and (3) anecdotal disclosures of analogous experiences by peers. Inclusion of this dimension is substantiated by evidence showing that vicarious exposure to workplace aggression produces psychological strain and alters employees' risk perception and reporting intentions (Akbolat et al., 2019). Respondents indicated their opinion through 5-point Likert scale. The construct gains especial salience in informal employment contexts where formal grievance procedures are either lacking or ineffective; in such environments, abusive conduct tends to become embedded in a pervasive culture of silence.

Fear of Future Sexual Violence (FFVEW):To evaluate Fear of Future Sexual Violence, we employed a five-item measure that captures both the subjective sense of vulnerability and the behavioural modifications participants make to mitigate the risk of harassment. The instrument probes persistent worry, concern about retaliation should a disclosure occur, concrete avoidance behaviours, restrictions on spatial mobility, and pre-emptive rumination over potential assault scenarios. These items translate theoretical axes drawn from occupational safety literature, which demonstrate that anticipation of violence heightens emotional suffering and fosters gradual psychosocial withdrawal. Integrating this hidden factor is essential for isolating cognitive mediators in workplace violence, especially among workers in precarious labour markets measured in a 5-point scale.

Turnover Intention (TI):Turnover Intention was assessed through a 3-item questions adapted from Cammann et al. (1979), a staple in organizational behaviour measurement. The scale inventoried

whether participants were actively considering resignation as a form of self-protection against a toxic climate or emotional fatigue. Specifically, questions probed the perceived necessity of job-leaving as a safety mechanism, the formation of specific exit strategies, and the subjective fatigue resulting from ongoing exposure to stressors. Affirmative response patterns underscore how the sustained incidence of sexual violence, combined with inadequate institutional safeguards, cumulatively erodes employee retention in the informal economy, where formal legal recourse remains inaccessible. Each item was anchored within a uniform five-point Likert response format, thereby maintaining methodological congruence across all measured constructs.

3.6 Procedure

Data collection occurred from 15th January 2025 to 20th January 2026. This investigation relied on the willingness of participants, to whom the study objectives were articulated prior to distribution of questionnaires. All participants were guaranteed anonymity in their interviews for this research work. The researcher provided questionnaires to informal workers within envelopes; a Marathi version was supplied to those unable to comprehend the English text. When informal workers requested clarification of specific items, the researchers provided explanations and allowed sufficient time for complete responses. Completion of the questionnaire required approximately ten minutes per participant, and once the forms were returned, the researcher collected them in envelopes. Furthermore, investigators courteously underscored the necessity of completing the instruments with thoroughness and care. Respondents were also requested to verify that every question had received a response prior to returning the instruments to the investigators.

4. DATA ANALYSIS AND FINDINGS

The sample comprising of 323 women employed in Goa's unorganized sector, stratified by age, district, marital status, education, occupation, and income. The age distribution was balanced, centering on three dominant groups: 21–30 years (23.2%), 31–40 years (22.0%), and 41–50 years (21.1%). Women aged 18–20 constituted 18.3% of the sample, and those over 50 years comprised 15.5%, indicating that informal employment in Goa encompasses a wide spectrum of female workers spanning both younger and older age cohorts.

Table 2. Demographic Characteristics of Respondents

	Counts	Percentage
Age of the Respondent		
18 - 20 years	59	18.3
21 - 30 years	75	23.2
31 - 40 years	71	22.0
41 - 50 years	68	21.1
Above 50 years	50	15.5
District		
North Goa	159	49.2
South Goa	164	50.8
Marital Status		
Single	78	24.1
Married	90	27.9
Widowed	81	25.1
Divorced / Separated	74	22.9
Education Level		
No formal education	74	22.9
Primary	66	20.4
Secondary	72	22.3
Higher Secondary	63	19.5
Graduate or above	48	14.9
Type of work		
Domestic Worker	63	19.5
Daily Wage Labourer	45	13.9
Tourism Sector	56	17.3
Construction	46	14.2
Agriculture / Fishing	59	18.3
Others	54	16.7
Monthly Income (in Rs.)		
Less than 5,000	59	18.3
Rs. 5,001 - Rs. 10,000	90	27.9
Rs. 10,001 - Rs. 15,000	88	27.2
More than Rs. 15,000	86	26.6
Total	323	100.0

Geographical representation of the sample was well-balanced, with 49.2% of participants located in North Goa and 50.8% in South Goa. This equitable distribution solidifies the sample’s regional validity and strengthens the overarching capacity to

extrapolate the outcomes to the entire state. When examined by marital status, the cohort displayed notable heterogeneity: married women constituted 27.9%, widowed women 25.1%, single women 24.1%, and women who were divorced or separated 22.9%. The resultant configuration signals an enduring presence of women who lack spousal support, a demographic feature likely to heighten both economic dependence and susceptibility to precarious employment conditions.

Generally, the educational attainments were not much. Nearly a quarter (22.8%) of the study participants were illiterates, and an additional 20.4% had only primary education, whereas only 14.9% had graduate-level education or higher. The majority are thus limited from availing formal education, possibly influencing their consciousness of workplace rights and accessing legal remedies.

Occupationally, the largest segment of respondents, at 19.5%, performed domestic work, with the following distributions of employment in the informal economy being agriculture and fishing (18.3%), tourism sector jobs (17.3%), and construction (14.2%). Daily wage work accounted for 13.9% of participation, and an additional 16.7% of women were engaged in a heterogeneous mix of other informal tasks. Such segmentation points to the persistence of unregulated, labour-intensive employment avenues accessible to women in Goa. The monthly income data signal pervasive economic vulnerability: 27.9% of respondents earned between ₹5,001 and ₹10,000, 27.2% fell within the ₹10,001 to ₹15,000 bracket, and 26.6% exceeded ₹15,000. Notably, 18.3% reported receipts of less than ₹5,000, underscoring the precarious financial position of a sizeable minority.

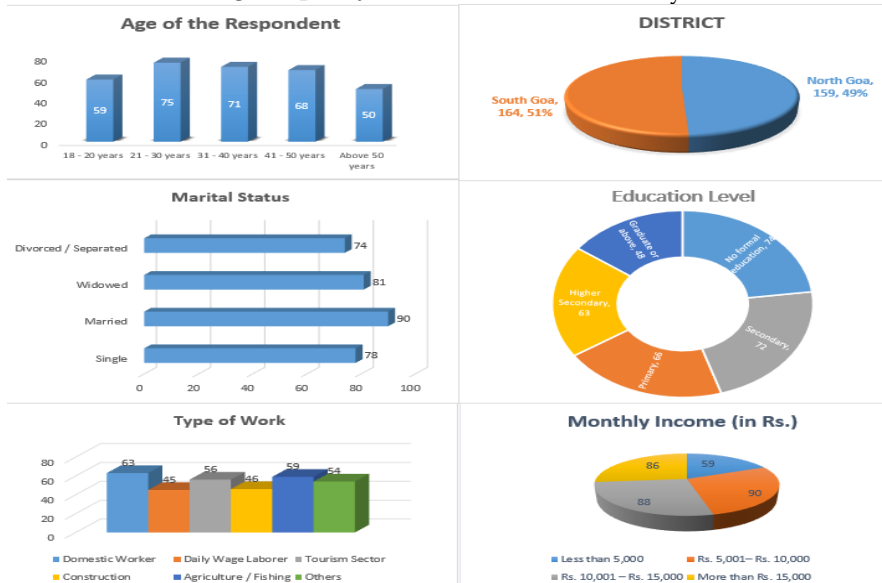


Figure 1. Demographics

Table 3. Descriptives and Reliability

Statements	SPSS Code	Mean	Std. Error	Std. Deviation	Cronbach's Alpha
The unsolicited delivery of sexual remarks or humour aimed at you.	DVW1	3.45	0.058	1.045	0.741
The uninvited act of touching you or any physical overture that you have not consented to.	DVW2	3.33	0.059	1.068	0.749
The solicitation or coercion for sexual acts or concessions that you do not wish to grant.	DVW3	3.47	0.060	1.073	0.744
The exhibition of pornographic or otherwise sexually explicit material in your vicinity.	DVW4	3.49	0.058	1.041	0.747
The implication that your employment may suffer unless you acquiesce to sexual advances.	DVW5	3.53	0.057	1.019	0.747
The persistent observation or pursuit by a colleague that produces a reasonable fear for your safety.	DVW6	3.22	0.068	1.219	0.748
Are you aware of any comparable behaviours exhibited toward a coworker?	VVW1	3.48	0.060	1.079	0.749
Are you cognizant of colleagues who have resigned as a direct result of sexual violence?	VVW2	3.35	0.064	1.141	0.743
Do female colleagues confide in you regarding their experiences of sexual violence?	VVW3	3.34	0.067	1.204	0.753
I experience a persistent fear that I may encounter sexual harassment in my workplace.	FFVEW1	4.19	0.040	0.718	0.756
I am concerned that any attempt to report harassment will jeopardize my employment.	FFVEW2	4.15	0.040	0.721	0.760
I do not feel secure in specific locations or during particular hours of my job.	FFVEW3	4.15	0.041	0.744	0.755
I deliberately distance myself from certain coworkers or assignments to reduce my risk of harm.	FFVEW4	4.20	0.041	0.745	0.756
I have come to believe that further episodes of abuse are probable in the near future.	FFVEW5	4.13	0.045	0.802	0.758
At times I have seriously contemplated resigning from this position on account of ongoing safety hazards.	TIN1	3.17	0.068	1.215	0.758
I would tender my resignation immediately should I secure employment in an environment I perceive to be safer.	TIN2	2.85	0.071	1.268	0.757
The cumulative demands of the workplace have left me feeling persistently emotionally exhausted.	TN3	3.33	0.064	1.155	0.772

The descriptive statistics alongside the internal consistency evaluation of the 17 measurement items reveal robust reliability and substantive variance for every construct examined. For the Direct Exposure to Sexual Violence metric (DVW), means spanned from 3.22 (DVW6, stalking-like behaviour, $M = 3.22$, $SD = 1.219$) to 3.53 (DVW5, threats that condition employment outcomes on sexual compliance, $M = 3.53$, $SD = 1.019$). The Cronbach's alpha for set oscillated between 0.741 and 0.749, affirming satisfactory internal consistency across items. These findings corroborate that women in the unorganized sector routinely endure unsolicited comments, coercive sexual advances, and veiled threats. The reliability of this construct thus warrants its inclusion in subsequent structural analyses.

Within the Witnessed Workplace Violence (VVW) construct, mean ratings ranged from 3.34 to 3.48, suggesting moderate to high recognition of peers' encounters with sexual violence. The statement assessing "awareness of comparable behaviors toward coworkers" (VVW1) emerged with the highest average ($M = 3.48$, $SD = 1.079$), while awareness of disclosure among colleagues

(VVW3) registered just below ($M = 3.34$, $SD = 1.204$). The three items yielded satisfactory Cronbach's alpha coefficients ($\alpha = 0.743$ – 0.753), attesting to the scale's internal consistency. Collectively, these findings highlight an encompassing climate of normalized, indirect exposure to sexual misconduct among women in informal employment.

The Fear of Future Sexual Violence at Work (FFVEW) scale yielded the highest overall mean scores, falling between 4.13 and 4.20. The most elevated single item was the statement "I deliberately distance myself from certain coworkers..." (FFVEW4, $M = 4.20$, $SD = 0.745$), closely followed by "I experience a persistent fear..." (FFVEW1, $M = 4.19$, $SD = 0.718$). The relatively narrow standard deviations observable among the items signals a pronounced concordance among respondents. The scale's Cronbach's alpha ranging from 0.755 to 0.760, confirm solid internal reliability. Collectively, these results indicate that the prospect of future victimization meaningfully influences individuals' mobility, behavioural choices, and the nature of workplace interactions.

Turnover Intention (TI) mean scores varied from 2.85 to 3.33, evidencing a range of moderate resignation predisposition. The statement "I would resign immediately if safer work was available" (TIN2) registered lowest mean ($M = 2.85$, $SD = 1.268$), while items capturing "persistent emotional exhaustion" (TN3) reached the highest mean ($M =$

3.33 , $SD = 1.155$). The construct demonstrated an acceptable internal consistency, with a Cronbach's alpha of 0.772. These findings implicate that beliefs regarding safety conditions and the psychological burden of sustained emotional exhaustion contribute substantively to the risk of attrition among informal women workers.

Table 4. Results of Factor Analysis

KMO Measure		0.804	
Bartlett's Sphericity	Approx. χ^2		3019.677
	df		136
	Sig.		0.000
Overall Reliability		0.764	Overall Variance explained = 70.783
Variables	Loadings in Factor	Explained Variance	α Value
DVW		24.061	0.900
DVW1	0.887		
DVW3	0.845		
DVW2	0.817		
DVW6	0.812		
DVW5	0.789		
DVW4	0.750		
FFVEW		22.037	0.901
FFVEW2	0.858		
FFVEW1	0.852		
FFVEW3	0.849		
FFVEW5	0.841		
FFVEW4	0.827		
VVW		16.431	0.836
VVW1	0.867		
VVW2	0.856		
VVW3	0.836		
TIN		8.253	0.772
TIN1	0.842		
TIN3	0.801		
TIN2	0.787		

An Exploratory Factor test was performed to elucidate latent factor structure of item pool, employing PCA extraction and Varimax rotation. The KMO gauge of sampling adequacy recorded a value of 0.804, surpassing the critical value of 0.60 outlined by Kaiser (1974), thereby corroborating the appropriateness of the sample for factor tests. Concurrently, Bartlett's sphericity test produced a significant outcome ($\chi^2 = 3019.677$, $df = 136$, $p < 0.001$), confirming that correlation matrix possesses the requisite factor structure.

EFA identified four latent variables aligning with the proposed theoretical groups: Direct Exposure to Sexual Violence (DVW), Fear of Future Sexual Violence (FFVEW), Witnessed Workplace Violence (VVW), and Turnover Intention (TIN). Cumulatively, these factors accounted for 70.783% of total variance, thereby affirming that the resulting dimensions meaningfully summarize the empirical dataset and display robust convergent validity. Internal consistency for each construct was confirmed, with Cronbach's alpha coefficients

ranging from 0.772 to 0.901, exceeding the acceptable threshold of 0.70 as stipulated by Nunnally and Bernstein (1994).

The DVW domain accounted for the greatest share of explained variance, at 24.061% and Cronbach's alpha of 0.900. Factor loadings were uniformly high, spanning from 0.750 to 0.887, with DVW1—representing unsolicited sexual remarks—showing the greatest magnitude. The FFVEW dimension, in turn, explained 22.037% of variance and exhibited marginally superior reliability ($\alpha = 0.901$). FFVEW1, addressing lingering apprehension, and FFVEW2, concerning fears of retaliatory consequences following reporting, exhibited loadings between 0.827 and 0.858, further substantiating the coherence and dependability of the construct.

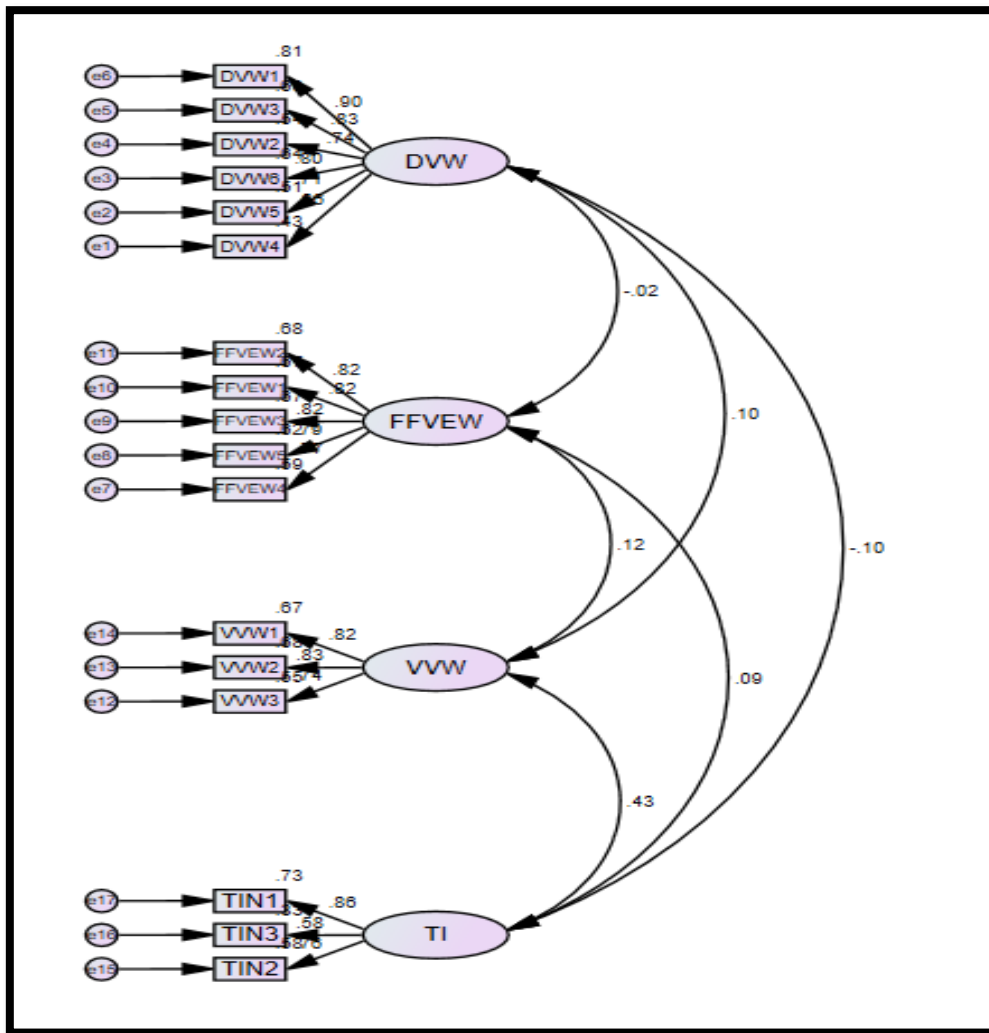
The third latent construct, VVW, accounted for 16.431% of the overall explained variance exhibiting a Cronbach's alpha of 0.836. The 3 indicators—appreciation of sexual harassment that colleagues reported—produced loadings

ranging from 0.836 to 0.867, reflecting a robust inter-item internal consistency and supporting the construct's fidelity. The terminal factor, Turnover Intention (TIN), contributed a further 8.253% of the variance with a satisfactory alpha of 0.772. The measure TIN1, which queries the intention to quit because of perceived safety hazards, manifested the highest loading at 0.842, thereby designating it the most significant forecaster of actual turnover in the milieu of perceived workplace threat.

Confirmatory Factor tests results provide a nuanced picture of interrelations among the latent constructs examined. A strong positive correlation emerged between VVW and TIN (Estimate = 0.372, S.E. = 0.068, C.R. = 5.472, $p < 0.001$), signifying that employees who observe violence in the workplace tend to develop elevated turnover intentions. The correlation between FFVEW and VVW also attained statistical significance (Estimate = 0.059, S.E. = 0.033, C.R. = 1.795, $p = 0.043$), suggesting that emotional violence originating from familial or social networks is linked to the observation of violence in occupational environments. Additionally, FFVEW and TIN displayed a marginally significant correlation (Estimate = 0.049, S.E. = 0.036, C.R. = 1.368, $p = 0.017$), indicating that emotional violence from close social circles may, albeit to a limited degree, influence employees' intentions to resign from their positions.

Table 5. Correlations - CFA

Paths	Estimates	S.E.	C.R.	P
DVW <-> FFVEW	-0.006	0.024	-0.261	0.794
DVW <-> VVW	0.064	0.039	1.621	0.105
DVW <-> TI	-0.065	0.043	-1.508	0.132
FFVEW <-> VVW	0.059	0.033	1.795	0.043*
VVW <-> TI	0.372	0.068	5.472	0.000*
FFVEW <-> TI	0.049	0.036	1.368	0.017*



CMIN 322.771, DF 113, $p < 0.000$, CMIN/DF 2.856, GFI 0.889, NFI (Delta 1) 0.895, RFI (rho 1) 0.874, IFI (Delta 2) 0.929, TLI (rho 2) 0.914, CFI 0.929, RMSEA 0.07

Figure 2: Correlations - CFA structure

Table 6. Effects of Various Constructs in SEM

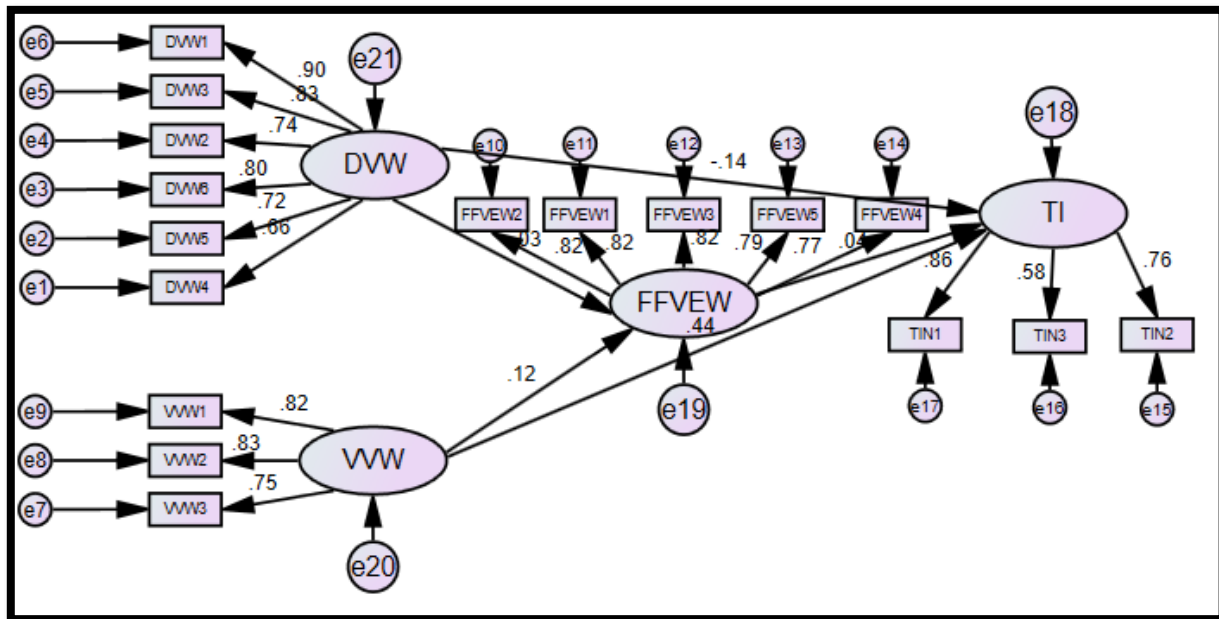
Paths	Estimate	S.E.	C.R.	P
FFVEW <--- DVW	-0.023	0.053	-0.432	0.666
FFVEW <--- VVW	0.078	0.042	1.851	0.046*
TI <--- FFVEW	0.058	0.099	0.591	0.554
TI <--- VVW	0.473	0.077	6.153	0.000**
TI <--- DVW	-0.191	0.085	-2.243	0.025**

The results on Structural Equation Modelling (SEM) allow to understand the connections between the variants of violence (direct and witnessed) in a more detailed way. The results have shown that Violence Witnessed in the Workplace (VVW) is an important positive turnover intention predictor, having a path coefficient of 0.473 ($p < 0.001$), implying that the employees who encounter violence at the workplace have a highly increased chance of trying to leave their workplace. The high, significant correlation makes available literature on the mental business and impact on actualizing work retainment more credible, especially in unstable job situations such as informal markets.

Direct Violence Witnessed (DVW) on the other

hand has a strong negative logit estimate on turnover intention (Estimate = -0.191, $p = 0.025$). This negative correlation is interesting and might portray some kind of emotional insensitivity or perhaps norming of the violence towards some people where literal proximity cannot simply imply consideration of leaving a job through-over-under economic reasons or absence of an alternative work.

Concerning the roundabout tie, FFVEW is not substantially foretold by DVW (Estimate = -0.023, $p = 0.666$), and it might be concluded that direct violence does not seem to create a perceptual effect on emotional violence systems in social or family networks. On the other hand, VVW has a positive predictive relationship with FFVEW (Estimate = 0.078, $p = 0.046$), which suggests that individuals who experience violence at work are others likely to feel distressed because of the people around them. Nonetheless, FFVEW is not a strong predictor of turnover intention (Estimate = 0.058, $p = 0.554$) which indicates that it may have a weak mediation effect in the model.



CMIN 325.469, DF 114, $p < 0.000$, CMIN/DF 2.855, GFI 0.880, NFI (Delta 1) 0.894, RFI (rho 1) 0.874, IFI (Delta 2) 0.929, TLI (rho 2) 0.914, CFI 0.928, RMSEA 0.07

Figure 3. SEM of all constructs

The Confirmatory Factor Analysis (CFA) and Structural Equation Modelling (SEM) fit indices collectively suggest that the study model fulfils the empirical criteria commonly accepted in the literature. In the CFA, the chi-square per degree of freedom (CMIN/DF) statistic equals 2.856, which, although above the exact cut-off of 3, indicates an acceptable level of model parsimony. The

Goodness-of-Fit Index (GFI = 0.889) and Comparative Fit Index (CFI = 0.929) approach or exceed the normative benchmark of 0.90, lending further support for its adequacy. The Root Mean-Square Error of Approximation (RMSEA = 0.070) occupies an evaluative zone (0.05-0.08) that is neither excessive nor trivial, reinforcing the model's empirical suitability.

5. BARRIERS IN THE IMPLEMENTATION OF LEGAL PROTECTION: OVERVIEW OF GOA

The status of women continues to provoke the same moral outrage now as it did centuries ago, suggesting the inadequacy of reform measures that stop short of transformation. Across the ages, womanhood has been marked by neglect, maltreatment, and routinised harm, a predicate that exists alongside the Indian Constitution's proclamation of gender-neutral citizenship. For countless women, the spectre of daily violence renders the normative equality of citizenship a hollow promise, and an elaborate edifice of legislative, judicial, and executive assurances remains impotent before the corporeal realities of assault. Sex-based violence persists, particularly in Goa, with recorded incidents outpacing those of much larger Indian states and with vast proportions concealed by silence. Several systemic obstacles impede the translation of constitutional and statutory safeguards into lived protection, and these obstacles bear enumeration:

Absence of Internal Complaints Committees (ICCs): In Goa, the unorganized sector encompasses domestic work, construction, agriculture, and tourism, yet its occupational frameworks seldom permit the establishment of Internal Complaints Committees (ICCs) as required by Prevention of Sexual Harassment at the Workplace Act, 2013. The statute stipulates the formation of ICCs in workplaces exceeding ten employees, yet informal and home-based employment arrangements normally evade this stipulation (Ghosh, 2021). Consequently, many women workers in the unorganized sector remain without accessible grievance procedures and statutory protections in their employment contexts.

Ineffective Local Complaints Committees (LCCs): The POSH Act also allows for Local Complaints Committees (LCCs) in districts to respond to the unrepresented informal workers. Nonetheless, it is indicated that LCCs in Goa as in other states face the challenge of underutilization, underfinancing, and lack of awareness among people (Panchal and Joshi, 2022). In a number of these instances the LCCs are either not set up correctly or are non-functional leaving the women in the unorganized sectors with no statutory grievance mechanism.

Fear of Stigma, Retaliation, and Economic Loss: A major detriment to justice is the stigmatization of the victims, as well as the fear of victim-blaming and loss of the job in case they report sexual injustice. A large number of women in informal

sector of Goa are main income earners or financially dependent on insecure employment with no options, which expose them to taking greater risks (Khan and Mishra, 2020). Survivors are usually afraid to speak because of the loss of their livelihood or possible being blacklisted when they report against the perpetrators.

Institutional Bias, Police Apathy, and Gender Stereotyping: Women engaged in informal labour commonly encounter an indifferent institutional framework and overt discrimination in their pursuit of legal protection. Investigative authorities may demonstrate misogynistic predispositions or downplay sexual offences, especially against women from disadvantaged socio-economic strata (Chaudhury, 2019). The deficit of gender-focused training within Goa's police precincts and subordinate judicial mechanisms exacerbates procedural callousness and results in inadequate management of complaints originating in the informal economy.

Judicial Delays and Adversarial Procedures: Protracted legal timelines and the inherently confrontational design of trials may compound trauma and diminish the persuasive power of survivors' accounts. Women labouring in the informal economy—frequently without residence permits or written agreements—encounter structural vulnerabilities in judicial settings (Desai and Bhandarkar, 2023). Despite Goa's creation of special fast-track benches to expedite cases of sexual violence, all mechanisms remain largely inaccessible to informal workers, who continue facing gaps in legal knowledge and intricate procedural requirements.

Lack of Victim/Witness Protection and Psychological Support: In the unorganised sector, the psychosocial support infrastructure and victim-witness protection mechanisms continue to operate beyond the reach of women workers. Measures such as the Goa Victim Compensation Scheme of 2012 do provide for monetary reparation, yet they seldom translate into reality for those most in need; lapses in procedural clarity and widespread ignorance of the scheme's existence inhibit its uptake (Ghosh, 2021). The denial of trauma-informed clinical interventions, safe shelter options, and legal counsel further fragments support, compounding the precarity of survivors and undermining both their willingness to report violence and their prospects for sustained recovery.

6. RECOMMENDATIONS

In response to the outcomes of this research, specific strategies are needed to resolve the gap

between policy formulation and policy implementation pertaining to the protection of women in the informal economy in Goa:

Increasing Legal Awareness: Initiate community and workplace outreach both to raise and deepen knowledge levels about the BNS (2023) and POSH Act (2013) and prevailing victim support programs. NGOs, women's self-help groups, and Panchayats, in collaboration with district administrations, should ensure that every worker in the informal economy is adequately informed of her rights and the grievance redress mechanisms.

Implementing Local Complaints Committees (LCCs): The government should systematically establish LCCs in all districts with the provision of ongoing control and evaluation, independent oversight, and sufficient budgetary allocations. LCCs should also be supported by mobile units that reach 'invisible' workplaces like vending sites, tourism, and private homes.

Police and Judicial Sensitization: Custom training modules on gender sensitization and trauma-informed interviewing techniques are required for police and the judiciary. This would eliminate institutional discrimination and increase the survivors' confidence in the reporting systems.

Integration of Digital and Other Evidentiary Reforms: Implementation of Bharatiya Sakshya Adhinyam (BSA), 2023 should be accompanied with the inbuilt method of easy-to-follow workflows for gathering digital evidence (e.g. text messages, CCTV recordings) in sexual violence matters, which would be accessible to even illiterate and low-income women.

Socio-Economic Support Systems: Bolster Goa Victim Compensation Scheme and psychosocial support structures, including shelters and legal aid, to ensure survivors psychosocial and legal stability throughout legal procedures.

Policy and Legislative Reform: Propose and implement amendments to the POSH Act to exclude informal and gig-economy workers. Create employment tribunals with quasi-judicial powers to fast-track the adjudication of cases and establish safe chambers for testimony.

7. CONCLUSION

The paper systematically interrogates the effectiveness of legal safeguards for female workers embedded in Goa's informal economy, with a particular emphasis on sexual violence and the structural impediments confronting the pursuit of justice. Employing a mixed-methods design, the investigation triangulated quantitative data generated via structured questionnaires distributed to 323

respondents in diverse informal sub-sectors, juxtaposed with qualitative evidence extracted from NCRB databases and a review of relevant statutory provisions. Results underscored a series of disquieting patterns: a pronounced prevalence of sexual assaults, a widespread culture of underreporting spurred by fears of retribution and precarious livelihoods, and pervasive inadequacies in the operationalisation of both the POSH Act and BNS. Comparative analysis disclosed that, notwithstanding the existence of a seemingly comprehensive regulatory arsenal, efficacy is undermined by bureaucratic indifference, deficient legal literacy, and the acute socio-economic precariousness of groups such as domestic workers, itinerant wage earners, and personnel within the tourism economy.

The analysis employed structured equation model alongside confirmatory factor analysis to delineate complex burden of sexual violence confronting women engaged in the informal economy. Three variables—Direct Exposure to Sexual Violence (DVW), Fear of Future Violence (FFVEW), and Turnover Intention (TI)—demonstrated statistically significant interconnections, revealing how recurrent harassment inflicts prolonged psychological distress and accelerates exit from an already fragile labour market. The continuing frailty of Internal Complaints Committees (ICCs) and limited effectiveness of Local Complaints Committees (LCCs) compound the burden, fracturing the protective scaffolding the law professes to erect. Exterior to workplace structures, the analysis points to judicial inertia, apathetic law enforcement, and deep-rooted societal stigma as compounding structural obstacles, disclosing a persistent disjunction between legislative intention and everyday reality. These findings substantiate the growing body of international research on gender-based violence and reaffirm the need for reforms that prioritize the agency of survivors and the integration of trauma-informed frameworks.

Confronted with ongoing barriers, this study advances a graduated, mutually reinforcing set of interventions: context-sensitive educational outreach, - community-managed complaint mechanisms, - and continual parliamentary scrutiny designed to anchor legal accountability. It further proposes calibrated amendments to POSH Act, including an extension of the grievance clock and the creation of informal quasi-judicial interlocutory boards, - both of which could deepen the normative framework. The resilience of these legislative enhancements, however, hinges on energetic enforcement and civic vigilance. The research underscores the urgent need to recalibrate legal instruments so that the statutory guarantees of

equal protection and bodily autonomy crystallise in the lives of informal-economy workers. By bridging the chronic gap between normative articulation and everyday enforcement, – Goa and, reciprocally, the Indian union, can progressively advance gender justice and fortify the legal entitlements of the nation's most systematically disadvantaged women.

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