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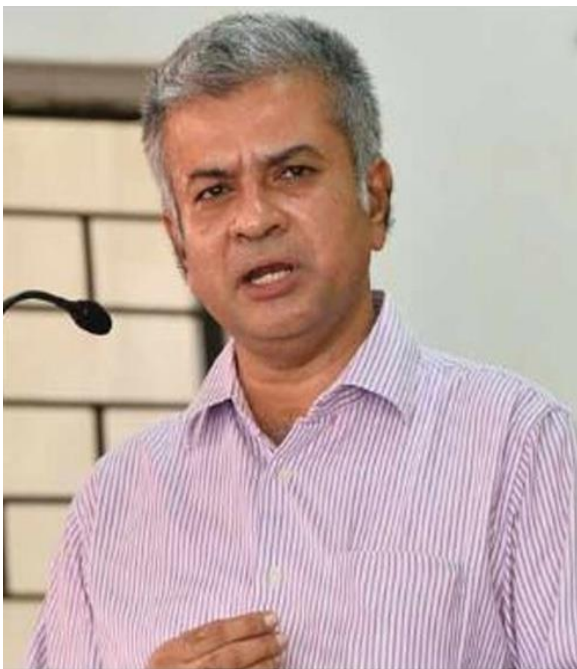
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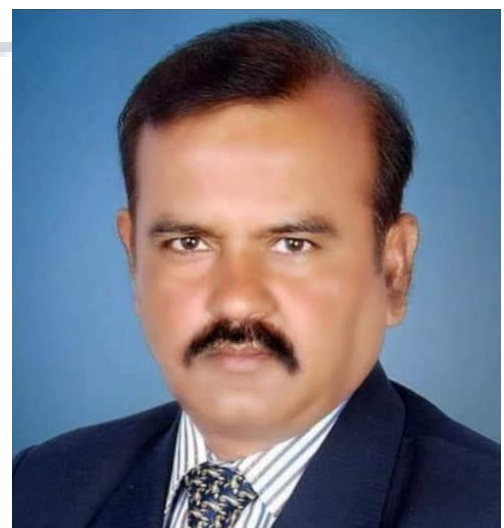
Dr. Raju Narayana Swamy popularly known as Kerala's Anti Corruption Crusader is the All India Topper of the 1991 batch of the IAS and is currently posted as Principal Secretary to the Government of Kerala . He has earned many accolades as he hit against the political-bureaucrat corruption nexus in India. Dr Swamy holds a B.Tech in Computer Science and Engineering from the IIT Madras and a Ph. D. in Cyber Law from Gujarat National Law University . He also has an LLM (Pro) ( with specialization in IPR) as well as three PG Diplomas from the National Law University, Delhi- one in Urban Environmental Management and Law, another in Environmental Law and Policy and a third one in Tourism and Environmental Law. He also holds a post-graduate diploma in IPR from the National Law School, Bengaluru

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Associate Professor at School of Law, Apex University, Jaipur, M.A, LL.M, Ph.D,

Dr. Rinu have 5 yrs of teaching experience in renowned institutions like Jagannath University and Apex University. Participated in more than 20 national and international seminars and conferences and 5 workshops and training programmes.

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E.MBA, LL.M, Ph.D, PGDSAPM

Currently working as Assistant Professor at Law Centre II, Faculty of Law, University of Delhi. Dr. Nitesh have 14 years of Teaching, Administrative and research experience in Renowned Institutions like Amity University, Tata Institute of Social Sciences, Jai Narain Vyas University Jodhpur, Jagannath University and Nirma University.

More than 25 Publications in renowned National and International Journals and has authored a Text book on Cr.P.C and Juvenile Delinquency law.

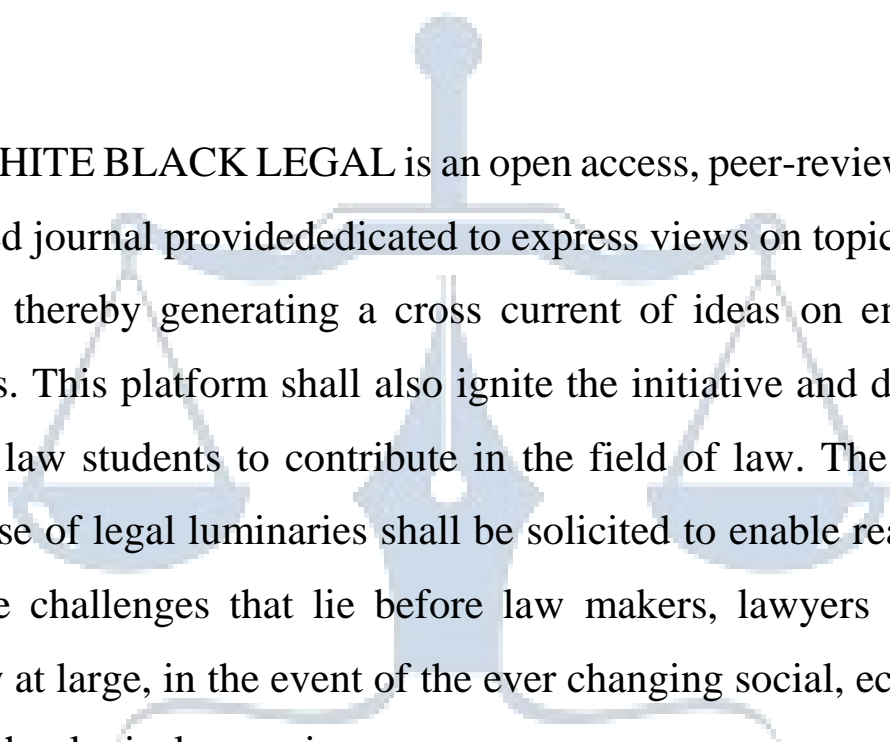


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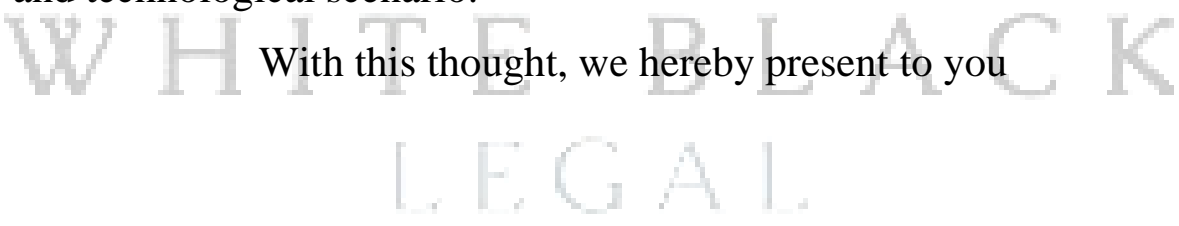
Subhrajit did his LL.M. in Sports Law, from Nottingham Trent University of United Kingdoms, with international scholarship provided by university; he has also completed another LL.M. in Energy Law from University of Petroleum and Energy Studies, India. He did his B.B.A.LL.B. (Hons.) focussing on International Trade Law.

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WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal providededicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you





# **SEXUAL HARASSMENT IN THE ARMED FORCES: LEGAL FRAMEWORKS FOR PREVENTION AND JUSTICE.**

AUTHORED BY - RICHA MISHRA  
SYBA-LLB-KES'S Shri Jayantilal H. Patel Law College.

## **Abstract:-**

Sexual harassment is unwanted verbal, non-verbal, and physical conduct of a sexual nature that directly affects the dignity of the victim. Lately, this issue has been discussed. However, sexual harassment in the armed forces is an issue that isn't talked much about. Sexual harassment in this sector affects the rights and dignity of the personnel, but also severely affects the combat or operational effectiveness of the military personnel. This paper throws light on all the unspoken issues faced by women in a male-dominated, hierarchal field. Furthermore, it talks about the application of Vishaka guidelines, the POSH ACT, concerning the Armed forces. Additionally, this paper also highlights and analyses a few case studies to dive deeper into this topic. Lastly, this paper recommends some victim-centric, comprehensive suggestions that could be implemented.

## **Introduction:-**

Sexual harassment has been a long-standing evil in the society or even the world. This problem transcends borders, unifying victims to speak against it. The Indian armed forces came into force on 1st April 1895. Being a strict, disciplined, male-dominated, hierarchical structure, also unlike civilian workplaces, this structure struggles to navigate through this particular problem. When it comes to reporting the cases, there's fear to a great extent amongst the victims, lack of quick reforms, power play, and lack of gender-sensitivity training.

The Vishakha guidelines come into play when the topic is workplace harassment. These are guidelines established by the Supreme Court to address the issue of workplace harassment. Later, the POSH ACT (2013) was passed to combat the same problem. The Vishakha Guidelines here acted as a foundation for these laws. This act was the first step towards setting

a safe space for victims in the workplace. However, its applicability within the military organization seems ambiguous. Being a male-dominated highly aggressive field, women find it highly difficult to navigate through it.

This study aims to understand the functioning of these laws in the military realm as the menace of sexual harassment goes on to haunt military personnel. The ultimate goal is to understand the existing problems in this realm and advocate for better and safer armed forces while also upholding the highest standards for dignity.

### **Understanding how sexual harassment looks in the Military:-**

Military sexual trauma; or MST as the West calls it, is the sexual trauma a military personnel goes through when they are serving in the military or are on duty. The main factor here is unwanted sexual advances. These sexual activities are against an individual's will. Some examples are (*Military Sexual Trauma: Effects & Veteran Resources - Mental Health*, 2024):-

- Forcing someone to engage in sexual activity for 'promotion' or a higher rank.
- Sexual contact, or advances when a person was asleep or intoxicated (both voluntarily and involuntarily.)
- Any sexual advances that made the victim feel threatened.

Sexual harassment has numerous side effects. It takes a toll on both the mental and physical health of the victim, often crushing down his/her will. A few effects are:-

- PTSD or Post-traumatic disorder.
- Inefficiency in working.
- Anxiety and depression.
- Depending on the severity of the crime, physical trauma.
- Self-doubts.

The problem is much worse in the Indian context as there is hardly any reliable or even public data in this context. The fact that it's not recorded properly shows that this hasn't even been taken seriously. With this, it becomes even more difficult to hold the perpetrators accountable. Surely time and again we hear such cases, but what happens later (that is if it happens) is barely known to the public.



Most of the cases go unreported due to:-

- Fear of being fired.
- Corruption.
- Influence.
- Victim-shaming or not believing them.
- Fear of being murdered.
- Cultural stigma.
- Lack of awareness.

### **What makes this challenge unique in the military?**

With the motto of 'Seva Parmo Dharma', our defence wing stands tall and undefeated. Working on strong ethics and being highly trained, I don't see a reason why the civilians should be doubting our military. But because social evils exist in every organization, they do here as well, harming the efficiency and dignity of the military. The military has a unique environment:-

- As per the Press Information Bureau (Press Information Bureau Government of India, 2021), women constitute about:-
  - a) Indian army:- About 21.25% of the Army Medical Corps (AMC) and Army Dental Corps (ADC), there is barely any static data, but they remain under-represented.
  - b) Indian Navy:- Women constitute about 6% of the Indian Navy. It should be noted that the Navy is progressing, as since 1992, women officers have been inducted into 11 different branches of the Navy.
  - c) Indian Air Force:- The most progressive out of the three, women comprise approximately 13.39% of the officer cadre (excluding medical and dental cadre). Air Force by far is the most exclusive one.
- Cultural Stigma:- Since the defence has always been a male-dominated field, women rarely take part in it.
- Physical requirements:- Physically, military work becomes strenuous for women. This is also a prime factor of women not being in higher counts here.
- Living conditions:- The military has a very demanding and burdensome environment, and hence women sometimes refrain from joining such a gruesome environment.

- Hierarchical:- The hierarchical structure of the military plays a very important role. Sometimes people might not report a case due to the culprit being of a superior authority.

### **Laws related to workplace harassment in the Military:-**

1997 saw a major change with the issuance of Vishakha guidelines (*Untitled*, n.d.). These came after the Bhanwari Devi rape case. Bhanwari Devi was a social worker who was raped while prohibiting the marriage of a 1-year-old child. A special PIL was filed in the Supreme Court, which also gained a lot of support from the public. Vishakha guidelines clearly define workplace harassment. It also gave guidelines for establishing a woman-majority complaints committee and mentioned the legal IPC (now BNS) sections that could be applied in such cases; if any.

Based on these guidelines, the POSH Act, or the Prevention of Sexual Harassment, was passed in 2013. POSH is a legal framework for handling sexual harassment in the workplace.

When it comes to military application, there's room for a lot of ambiguity. In a case in 2023, (*IN THE HIGH COURT OF JUDICATURE AT MADRAS Reserved on 01.03.2023 Pronounced on 20.07.2023 CORAM: THE HON'BLE Ms.JUSTICE R.N.MANJ, 2023*) in the Pt.46 of the judgement, the honourable court directs the Centre to set up an Internal Complaints Committee in accordance with the mandates of the POSH Act 2013. The court also directed gender awareness sensitised training to the army personnel.

**Section 69 of the Indian Army Act, 1950** mentions (*The Indian Army Act, 1950*, n.d.) that any person subject to this Act who at any place in or beyond India commits any civil offence and would be found guilty under this section will be tried in court martial proceedings. This includes harassment cases as well.

**Section 23 of the Navy Act, 1957** states (*Navy Act 1957.*, n.d.):- 23. Remedy of aggrieved persons.—(1) This section states that if any officer feels oppressed or harassed or even ill-treatment by a superior, he can make a complaint under this act.

While the **Indian Air Force Act, 1950** (India Code, n.d.) doesn't explicitly state a particular section related to harassment matters; it states separate articles for misconduct. Section 42,

section 40, and section 47 state how insubordination, obstruction and misbehaviour within the Indian Air Force can be dealt with. There are also separate provisions to file complaints against improper behaviour by seniors. Those are sections 26 and sections 27.

The military works on court-martial proceedings and internal inquiries and is not governed by the civilian law POSH Act. The military places as mentioned above operate on separate acts. And because of the hierarchy, it becomes pretty intimidating for the victims to file a complaint. Moreover, civilian workplaces are more prone to adapt to gender sensitivity training and setting up ICC than military workplaces.

## **Challenges In The Application Of Laws Related To Workplace**

### **Harassment In The Military:-**

Existing of certain laws is often confused with them being applied in the practical world, which is untrue. Seldom do people report, and even then, there are secondary challenges awaiting them. Major challenges are:-

- **Hierarchy:-** The military works on hierarchy, which makes it difficult for people to report, especially against seniors.
- **Expulsion:** Victims fear being fired from their jobs, which are often their only source of income.
- **Male domination:-** Often in such a rigid environment, it is possible for women to be disheartened even before reporting the case.
- **POSH Act application:-** It doesn't directly apply to the military institutions, hence creating a huge gap in justice-seeking.
- **Ostracization:-** When such reports get out, others can ostracize the victim.
- **Cultural taboos:-** Often cultural taboos make reporting of such cases difficult.
- **Gender Sensitivity:-** The existing laws focus more on discipline and conduct and not on sexual misconduct.
- **Inadequate support systems:** The absence of trained psychologists or trained staff who can provide help to the victims might also discourage victims from coming out.
- **Transparency:-** When it comes to the opacity of the data, India needs to do much better. There is hardly any data.

One debate is if women feel uncomfortable, why work at such places? To such flag bearers of patriarchy, the only counter-question would be why is a woman even feeling uncomfortable at

such a place? Women have every right to earn, provide, and work with dignity. They bring a new dimension to the workplace. The prime focus should be how such places can be made inclusive and safe enough to foster growth.

Another debate is it is sometimes pretty difficult for men to control 'their animal instincts' around women. The subject here is the military; men who handle the pressure of being in high-level combat situations. Being respectful and a decent human is not even half as difficult as the situation above. Making such a statement is even a disrespect to the military. These are highly trained individuals with high valour and emotional strength. Implying they lack basic discipline is highly disrespectful.

### **Impact of Sexual Harassment in the Armed Forces:-**

Sexual harassment is a grave crime with its ill effects. From physical to mental strength, it completely shatters a person. When it comes to the military:-

- **Working ability:-** Military personnel always have to be vigilant. Their job has extremely demanding physical and mental needs, and a situation like this can immensely affect a person's working abilities and endurance.
- **National Security:-** Victims posted on duty will likely be less vigilant due to the trauma caused to them. It is risky to post them without proper counselling as they deal with national security.
- **Mental Trauma:-** Individuals can also suffer from PTSD or post-traumatic stress disorder. This can impact their physical and mental competence.
- **Tensions among units:-** The trust between individuals would only break, further harming the unity of the forces.
- **Military image:** Army men are also known for their gentlemanliness, but such acts tarnish the military's image.
- **Career of the working professional:** The victim might be fired from their job, making the situation even worse. When the perpetrators are seniors, victims often hesitate to seek help. Aside from threats, the primary reason is losing their job.
- **General mindset:-** If the perpetrators aren't punished properly, it sends out an image that such acts wouldn't be taken seriously, creating an even more unsafe environment.



### Case Studies:-

Indian Military became a part of the #metoo movement back in 2007. After the then-newly appointed Army chief General Deepak Kapoor said he would eliminate all cases of indiscipline and corruption in the army. Considering their line of work, in most of the cases the names of the accused and the victims have been hidden.

- **Captain Neha Rawat vs Major A K Lal [2007] (guide, 2007):-** Probably the only case most people have heard of, Captain Rawat accused Major A K Lal of sexual assault under the false pretext of Yoga and meditation. He was also found guilty by the army court.
- **A senior officer accused (THE NEW INDIAN EXPRESS, 2015):-** An aggrieved father had written a letter to the then Defence Minister of India, Mr Manohar Parrikar. His daughter had marched down the Rajpath in 2015, showcasing woman power. However, she was also meanwhile getting harassed by her commanding officer. He used to not only touch her private areas but also pass comments such as ‘when a lady officer salutes, people look at her breasts, and when they pass by people look at their butts’. He also regularly commented on what type of undergarments she should've been wearing.
- **IAF woman officer alleged a sexual assault FIR against Wing Commander (What IAF Woman Officer Alleged in Sexual Assault FIR Against Wing Commander in Srinagar / 10 Points, 2024):-** This very case highlights a lot of problems. A woman officer was called into a senior officer's room under the pretext of giving her a gift, where, after reaching, she was sexually assaulted. Before filing the complaint, she was discouraged. When she approached the ICC, they did not conduct her medical examination until the last day of the investigation. She also shared that she was having suicidal thoughts and that her mental health wasn't very good. This highlights how difficult it is to be a woman officer in the army.
- **Non-commissioned officer(ANI News, 2022):-** A non-commissioned officer was found guilty of harassing a female captain. A swift action was taken, and the army court martial dismissed the officer from service and also gave a jail time for 1 year. The female officer had gone to Sikkim to learn a river rafting course, and she was staying in official accommodation. The havildar was accused of using criminal force to outrage the modesty of the female officer. He also made ‘sexually coloured’ remarks.

- **Nisha Priya Bhatia vs Union of India (SCC Online, 2020):-** This case is from the R&AW or the defence wing of the country. Nisha Priya Bhatia was the director of R&AW. She was coerced into performing improper activities for promotion. After reporting the harassment, she faced professional setbacks, making her commit suicide in the PMO's office. A compensation of 1,00,000/- rupees was given to her as compensation for her dignity and improper handling of the case. This case highlights the existing evils of the defence sector. Her life was only worth 1,00,000/- rupees even though she was the director of such a prestigious institution. The improper handling and social insensitivity also made her take her own life.

As per the Government of India report of 2023, the number of cases reported to the ICC is 123, and in 112 cases, action has been taken against the perpetrators. (Government of India, n.d.).

### **The way forward:-**

As a country that worships women, we need to make sure our women are safe in every sector. While civilian places come under the POSH Act, the military, because of its rigidity, hasn't reached that point. The following recommendations could be considered to foster a safer environment in the military:-

- **Organisation:-** With the vision of 'A military free from sexual assault' the USA has a separate organisation named SAPRO (SAPRO, n.d.) that looks into matters of sexual harassment.
- **Reports:-** Every year, the SAPRO publishes reports (*SAPRO Reports*, n.d.) of sexual assault cases, promoting transparency and advocacy for women's rights. By implementing this, our country could too have transparency in such matters.
- **Gender Sensitivity training:-** Additional gender sensitivity training should be given to the officers in the academy so that they can develop an environment which is safe for women. Cultural taboos shouldn't exist when it comes to the safety of women.
- **ICC:-** The internal complaints should have a sensitive environment so that women feel safe about reporting the cases to the committee.
- **Psychologists:-** There should be trained medical doctors to help the victims mentally, as sexual harassment takes a severe toll on the mental health of the victim, sometimes even amounting to suicide (as happened above in the Nisha Priya Bhatia case).
- **Trained doctors:-** The medical examination should be strictly taken by medical doctors, and also under 12 hours of reporting the incident.

- Safety:- Making sure that the victim isn't fired from the job and is completely safe is also the responsibility of the concerned military organisations.
- Strictness:- Often harassment starts with passing sexually coloured remarks. If these are reported in the first instance itself, a greater crime could be prevented from being committed.
- Victim-Sensitivity training:- How people start treating the victim is also a matter of concern. Hence, sensitivity training should also be given to them.
- POSH ACT:- Bridging the gap between the military law and the POSH Act or bringing up a new act for military sexual assault is another way to go forward with this issue.

### **Conclusion:-**

We sleep peacefully because someone out there is ready to sacrifice their life for us. Sexual harassment in the military is something no one talks about. Military personnel have the right to live with utmost dignity, and strict action should be taken against perpetrators of such crimes who harm the social fabric of our country. This paper covers how the hierarchy, cultural stigma, and taboos leave the victims vulnerable. Furthermore, despite the existence of laws like the POSH Act, sexual harassment remains a problem in the military, showing how their limited applicability is a problem. Cases of reputed officers like Captain Neha Rawat or Nisha Priya Bhatia highlight how this isn't a minor problem and can happen to anyone.

The absence of data and non-transparency is another matter of concern. It emphasises the need for the opacity of data for better policies and reforms in the military. Another issue is a safer environment in the ICC so that victims can approach the committee without any hesitation.

In conclusion:- The reforms need to come at two levels simultaneously, one through laws and the second through the military environment. By introducing new legal reforms and imparting gender sensitivity training, we create a new and stricter environment for the military.

This paper does not intend to harm or disrespect the sentiments of the Indian Armed Forces. The author has immense respect for the military. By writing this, the author only advocates for a safer environment in the military, which in turn will bring out a safer India, which will further uphold the dignity of the military personnel.

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