



SEXUAL OFFENCES AGAINST FEMALE CHILD IN INDIA: EMERGING ISSUES & CHALLENGES

Sushil Kumar Rohilla*

Research Scholar, CDLU, Sirsa

skrohilaadv@gmail.com

I. INTRODUCTION

“If there must be trouble, let it be in my day, that my child may have peace.”

-Thomas Paine

Child abuse how a day is a common socio legal problem in India. The children are being abused at homes, schools and even in public places. Disabled, especially mentally disabled are being abused about four times, more than the other children.¹ It is not an offence against an individual only but against the society as a whole. In the present social context, children are more vulnerable to crime and it's mandatory that the State should protect the life and liberty of its children. But the proved ineffectiveness on the part of the State to curb the violence against children erodes the confidence in the rule of law. The neglect and indifference toward them during the investigation and subsequent prosecution help the offenders bypass penal provisions of law. The increasing rate of acquittal in offences against children shows that judicial responses towards child victims are not sympathetic. The provisions of the law relating to sexual assault against adult women, also apply to cases of child abuse. The legal definition of rape excludes several other forms of sexual assault and abuse that can injure the bodies and minds of children. The weakest among those who are marginalized and bearing the brunt of the onslaught on the poor are children, and especially female. *Child Sexual Abuse* is a reality that children in India have been facing continuously irrespective of their gender or societal strata.²

“Sexual Offences” relating to rape and unnatural offences constitute an altogether different kind of crime, which is the result of a perverse mind. The perversity may result in rape or in homosexuality. Those who commit such crimes are psychologically sadistic person exhibiting that tendency in rape forcibly committed by them³. An attempt has been made to examine statutory provisions, and critically evaluate Court's attitude towards such crimes. Female Children face all forms of sexual assault in India and offences against female child have reached to an epidemic proportion. The number of child rape cases registered is indicative of sexual assault against the female children. A total of 48,338 child rape cases were recorded from 2001 to 2011. These include 2,113 cases in 2001 and 7,112 cases during 2011. The cases of child rape have been consistently increasing and India saw an increasing of 336% of child rape cases from 2001 (2,113 cases) to 2011 (7,112 cases). These are just the tip of the iceberg as the large majority of the cases of child rape are not reported to the police while children regularly become victims of other forms of sexual assault too.

Indian Children, who account for a staggering 42% of the country's population, have long been the victims of some of the most brutal sexual crimes known to humanity. The lackadaisical attitude of the Union Legislature, the apathy of its law enforcement agencies and the conspicuous absence of any specialized legal framework to deal with cases of child sexual abuse have only played the role of transforming this bitter truth into a perennial reality that seems to have been passively solidified and strengthened by decades of State inaction, With the growing precedence of child trafficking⁴, sex tourism, the *devadasi* system, prostitution, child pornography, incest and child rape, one is left horrified at the prospect that there is not a single legislation that specifically deals with the issue of child sexual abuse.⁵

A majority of sexual offences committed against female child are not even reported, let alone prosecuted. If any individual is brought to trial, conviction is unlikely as cases are very difficult to prove. Moreover, sexual abuse cases are usually tried in criminal Courts where defense Counsel tactics include postponements or adjournments and cross-examination techniques are designed to confuse and discredit the female child. As a result, offences

* Research Scholar, Department of Law, CDLU, Sirsa, Haryana



of such type go unreported and even if they are reported the lengthy and cumbersome Court procedures give enough time to the offender to pressurize the female child to retract the statement.

In a girls school, Girls spoke about harassment and how laws can help, "The children have to be made aware that certain kinds of behavior are crimes, but there is no point in telling them about the IPC, so we have to figure out how to say the relevant things without complicating them,"⁶

II. HISTORICAL BACKGROUND

In ancient times, the Indian woman was described at various places differently. She was worshipped as Goddess like Laxmi, Saraswati, Parvati – the Goddess of richness of knowledge, music and art, and symbol of strength respectively. Although in those time subordinate position of women is also reflected in great epics of Ramayana and Mahabharata such as torture of Sita by Ravans and Draupadi at the hands of Kauravas respectively with attempts to aggression to their womanhood. The Pandavas treating Draupadi as a chattel or a live stock putting her at stake to satisfy their ego in gambling, reveals the subordinate position of women in the male dominated society.⁷

The Indian sages and philosophers have time and again stressed the need for a very high place to the women in the society and have incorporated dictums in their teaching, which put the women on a very high pedestal. In this connection, there is observation in Manu Smriti, that the house where there is respect for women alike the abode of Gods but where that is not so, all other forms of worship are fruitless.⁸

Females are about 50 percent of the world population. It appears that half of the female population is virtually subjected to all kinds of violence which recognizes no geographical boundaries. In India too, out of many violent acts, some occur with deepest gravity e.g. infanticide, bride harassment and burning, practice of Sati and sexual violence like immoral traffic in females, molestation and rape. Child marriages, demands of dowry and indecent representation of women are other crimes.⁹

In India, if a male child is born it is almost like a festival, but if a female child is born all happiness ends. A female child is given less care than male child in terms of facilities like- meal, education, money, consultancy etc. Parents tends to hurry their marriages. Also, she is not allowed to work in companies and to go outside. So we can say that harassment on sex basis starts rights from birth of female child and it ends only with her marriage. Male child is considered necessary for extension of father's name. But female child is considered as "Praya Dhan", "Amanat". Female children are look after with this objective that they are to be sent in another's home. More emphasis is given on their talent in cooking, painting, household works than education or other personal traits.

III. SEXUAL OFFENCES AGAINST FEMALE CHILD

Sexual Abuse: Sexual abuse is defined as the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, for which the child is not prepared, or else that violates the law or social taboos of society. Actual sexual intercourse may not be very common but other forms of abuse like incest, sodomy, caressing, exhibitionism, masturbation and voyeurism occur with disturbing frequency. Unlike as in adults, in children the use of force is not an essential part of the abuse. Since children are incapable of understanding the implications of the act, their willingness has no meaning whatsoever. In fact most instances of abuse would be where child is not even aware of being abused and treats it as play. Countless are the instances, wherein elderly relative makes sexual advances on unsuspecting children especially girls. Male and female servants, in whose care small children are left are the most common offenders adolescent boys playing with younger girls even in socially sanctioned play can indulge in such acts.¹⁰

Sexual Assault: Sexual assault is the commonest of all forms of abuse. In our acquisitorial jurisdiction, courts tend to be liberal to the accused on the grounds of 'benefits of doubt', or rather, that the extent of proof is not beyond reasonable doubt, and flimsy excuses like injury not on a particular part, relationship with the victim etc. are used as grounds for acquittal even if there is enough medical evidence corroborating the occurrence of sexual assault. The cardinal principle of criminal jurisprudence is that the offence should be proved 'beyond reasonable doubt'. It is a settled principle of law, that where as per the evidence produced, two possibilities can be deduced, one which goes in favour of the prosecution and other which benefits the accused, the accused is



entitled to the benefits of the doubt. The liberal application of this fundamental and basic principle of law and the severe handicaps suffered by victims of rape have unfortunately, led to the acquittal of many a culprit.

Rape: The rape laws as apply to female-children are severely deficient in many respects. As regards the male-child, the Indian Penal Code does not regard their sexual abuse as 'rape'. Sexual offences against boys are clubbed under the provision of 'unnatural offences'. The precise and unmistakable areas of concern and the challenges facing the criminal law needs detailed analysis.

No specific provision dealing with female child rape: In matter of sexual offences, female children are treated at par with adults. Sexual abuse of female child has not been recognized as a separate category of crime. The provisions of the laws relating to sexual assault against adult women also apply to cases of sexual abuse of child. There is neither any specific chapter nor any specific provisions in the Indian Penal Code dealing with child rape or other forms of sexual violation against children. The definition of rape under Section 375 of IPC, applies equally to an adult woman and a girl-child/minor.

Meaning of the term "sexual intercourse": Section 375 uses the expression "sexual intercourse" but the said expression has not been defined in the Indian Penal Code. Whilst interpreting the provisions of Section 375, the judicial approach has been to adhere to above meaning of "Sexual intercourse" This means that forced oral sex or anal sex is not considered as rape for the purpose of crime of rape under section 375 of IPC.

Meaning of the term "penetration": 'Penetration', which is commonly understood to mean only penetration of the penis into the vagina, becomes totally redundant in most of the cases pertaining to the sexual abuse of children. In a vast majority of child sexual abuse cases the penetration is other than penile-vaginal. In the case of children, especially of tender age, penile vaginal penetration is not physically possible.

Proof of penetration: In cases of sexual abuse of child, penetration may not always take place, while the rape laws insist that 'penetration' should be proved. This loophole allows the accused to plead that the case be treated as molestation and the imprisonment for a period of seven years and to pay a fine of Rs. 25,000/- (to be paid to the victim).

A complete overhaul of the laws with regard to sexual offences against children has therefore, become indispensable.

Rape of Female Children under the age of 18 years.

Proof of the rape victim is crucial since the 'consent' of the victim is immaterial in cases where she is below 18 years of age. The burden of proving the age is squarely placed on the prosecution. If the prosecution fails to prove that the girl was below 18 years, it would have the additional burden of proving that the girl did not consent to the sexual intercourse. The difficulty is further heightened by the judicial pronouncements that ossification tests carry a margin of error of two years and the benefits of doubt is to be given to the accused. As a result, unless the girl is clearly below 14, no conviction can take place without irrefutable proof of absence of consent. This results in grave injustice to teenage girls bordering on the age of majority.

Therefore, while considering the question as to whether the victim is technically a minor or major, the fate of the victim in trials is wholly dependent upon the judge's impressionistic observations and conscience. In the true sense, the ultimate violation was on 16 December 2012, a young woman was brutally Gang raped in the heart of national capital in a public transport vehicle. This had shaken the nation, and was condemned in other countries for this inhuman behavior.¹¹

IV. LAWS RELATING TO SEXUAL OFFENCES AGAINST FEMALE CHILD

The following law is relevant with respect to sexual offences against female child and the commercial sexual exploitation of children.¹²

- Female child & Adult Women (Categorization).
- Outraging Modesty of a women,
- Kidnapping; and Child Trafficking;
- Selling and Buying of minor girls for prostitution;



- Rape;

Child and Adult victims-wise categorization: According to Section 1 of The Protection of Children for Sexual Offences Act, 2012, Sexual offences are prominently covered under different sections of Indian Penal Code, The Indian Penal Code does not provide for all types of sexual offences against children and more prominently, *does not distinguish between adult and child victims*.

In Section 3 of this act, The term 'woman' is usually used for an **adult**, with the term **girl** being the usual term for a **female child** or adolescent. However, the term '**woman**' is also sometimes used to identify a female human, **regardless of age**, as in phrase such as 'women's rights'. Women are typically capable of giving birth, though older women who have gone through menopause and some intersex women cannot.

According to Section 10 of the Indian Penal Code, The terms '**man**' and '**woman**' have been used in the Code in a generic sense, meaning a living human being but not one in the womb. It does not prescribe any particular age for the purpose of definition of the terms **man** and **woman**, for instance, even a **boy of 4 years** and a **girl of 3 years** of age are **man and woman** with the meaning of this section.¹³ The word '**woman**' denotes a **female human being of any age**.

However, a **girl aged six years** has been held to be '**woman**' for purpose of Section 354, IPC.¹⁴ The definition of rape under Section 375 of IPC, applies equally to an adult woman and a girl-child/minor.

Outraging Modesty of Women:

Assault or criminal force to women with intent to outrage her modesty:-

Assault to a woman:

Section 354, IPC has been enacted with a view to protect a woman against indecent assault as well as to safeguard public morality and decent behavior. The section punishes an assault, or use of criminal force to any woman with the intention or knowledge that the woman's modesty will be outraged.

Ingredients:

- (1) A woman was assaulted or criminal force was used against her;
- (2) The accused intended to outrage her modesty or knew that her modesty was likely to be outraged.

Woman's modesty:

What constitutes an outrage to female modesty is nowhere defined. This will depend upon the facts and circumstances of each case and according to the moral, social and legal ethos and traditions of the country and modesty is a question of fact in each case, and there is no abstract conception of modesty that can apply to all cases.

Major Singh¹⁵:

In the case of Major Singh, the accused had caused injuries to the vagina of a seven and a half month child by fingering. Held, the accused was liable for outraging the modesty of the child under section 354 IPC. The court held that the essence of a woman's modesty is her sex, young or old, intelligent or imbecile, awake or sleeping, the woman possesses modesty capable of being outraged. Thus whoever uses criminal force to her with intent to outrage her modesty, commits an offence under section 354, IPC

Intention is the gist of the offence:

It is not every act that is criminal. To bring an assault within section 354, IPC the act must be done with the intention or knowledge that it is likely to outrage the modesty of the person with reference to whom the act is done. In *Ram Das v State of West Bengal*¹⁶ the accused was charged for having committed offence under section 354 IPC.

Kidnapping:

The word 'Kidnapping' has been derived from the word 'Kid' meaning 'child' and 'napping', to 'steal', Thus, kidnapping literally means child stealing. And the word kidnapper originally (during the 17th Century) meant to signify one who stole children and other to provide servants and labourers for the American Plantation.

Section 359, IPC classified kidnapping under two categories,

- (1) Kidnapping from India (section 360 IPC)
- (2) Kidnapping from lawful guardianship (section 361,IPC)



Kidnapping under the Code is not confined to child stealing. It has been given a wide connotation as meaning carrying away of a human being against his or her consent, or the consent of some person legally authorized to accord consent on behalf of such person (if male of 16 and a female of 18 years or an insane).¹⁷

Child Trafficking:

Procurement of minor girl- Section 366 A and 366 B, IPC were inserted in the Code by the Indian Penal Code (Amendment) Act, 20 of 1923, section 3 to give effect to certain articles of the International Convention for Suppression of Traffic in Woman and Children. These sections came into force on 1st May, 1924 and are intended to punish import or export of girls for prostitution.¹⁸

Section 366-A IPC is attracted when a person induced a minor under 18 years of age to go to any place, or to do any act, with the intention or knowledge that such minor may be forced or seduced to illicit intercourse with another person. The section has been

framed more with the desire of safeguarding the public interest in morality than the Chastity of the particular woman. Section 370A a new section was added.

Selling and Buying minor for prostitution:

Section 372 and 373, IPC punish the trade of selling and buying minors for purposes of prostitution. These sections are in consonance with article 23 of the Constitution, which prohibits traffic in human being and sanctions punishment for the practice of such acts.

When a brothel keeper allowed a girl to visit the brothel for two or three hours in the night and allowed her to prostitute herself to customers for money, this constituted obtaining of possession of such a girl within the meaning of the Act. Similarly, where the

accused, a brothel manager, obtained possession of a girl below 18 years of age, the presumption was that she would be used for prostitution.¹⁹

Rape:

The word rape which is derived from the Latin tern *rapio*, means 'to seize. Thus, 'rape' literally means a forcible seizure. It signifies in common terminology, "as the ravishment of a woman without her consent, by force, fear, or fraud" or "the carnal knowledge of a woman by force against her will" and **with or without consent of a female child when she is under 18 years of age**. In other words rape is violation with violence of the private parts of a woman, an outrage by all means.

Intercourse under promise to marry constitutes rape only if from initial stage accused had no intention to keep promise. An accused can be convicted for rape only if the court reaches a conclusion that the intention of the accused was *malafide*, and that he had clandestine motives; *Deepak Gulati v. State of Haryana*²⁰, The IPC, in sections 375,376 and 376A to 376E has deal with sexual offences and unnatural offences under section 377, IPC. Section 375, IPC enumerated the offence of rape.

Consent of a girl under eighteen years not valid in law:

According to clause 6 of Section 375, IPC, A girl under eighteen is considered incapable of giving consent for sexual intercourse. But before The Criminal Law (amendment) 2013, a girl under sixteen was considered incapable. The apex court held in

Sidheshwar Ganguly²¹, that the consent of the victim is immaterial when she happens to be under sixteen years of age on date of the occurrence, i.e. 20 April, 1954, when the accused was alleged to have had sexual intercourse with the girl. Though the ossification test (X-ray examination) is not a sure guide to determine age, in the absence of birth certificate the conclusion as to the age could be drawn from the fact and circumstances including physique of the person and medical examination.

Where accused was proved to have committed sexual intercourse with a minor girl aged 5 years which was supported by evidence of mother of victim and medical evidence that semen was found on *nicker* of victim, accused was held liable for offence under section 376 (2)(f), IPC.²²

Where prosecutrix aged only five years victim girl in her statement stated that accused took her to terrace on pretext of giving chocolate to her, and committed rape, the evidence of her parents was also found reliable and truthful, accused was properly convicted under Section 376 (2)(f), IPC. His conviction was affirmed.²³



In a very famous case of *Dhananjaya Chatarjee v State of W.B.*, Rape and Murder of a helpless and defenseless school girl of eight year by a security guard. Death sentence imposed by the Trial Court subsequently confirmed by the High Court. Held, that the offence was not only inhuman and barbaric but a totally ruthless crime of rape followed by cold-blooded murder and affront to human dignity.²⁴

Rape of minor girl aged seven to eight years. Held, there is not legal compulsion to look for corroboration of the evidence of the prosecutrix before recording an order of conviction. Evidence has to be weighted and not counted. Convictions can be recorded on the sole testimony of prosecutrix, if her evidence inspires confidence and there is absence of circumstances which mitigate her veracity.²⁵

Rape of minor girl aged 14 years. The Supreme Court did not enhance the sentence of three year rigorous imprisonment passed by the Trial Court. Held, merely because the prosecutrix was simple enough to repose confidence in the accused persons and stayed with them in a room in a hotel, it cannot be held that she was a consenting party.²⁶

V. PROTECTION OF FEMALE CHILD FROM SEXUAL OFFENCES

In, India, provisions for protection of female child are made in different legislation codes etc. like POCSO Act, IPC, Cr.P.C., Indian Evidence Act, Vishakha Guidelines.²⁷ Even in Grundnorm of our country i.e. Constitution of India, various articles are provided for protection of women. Brief account of existing legal framework is given under:

Constitution of India

Article 45 has provided that the State shall endeavor to provide early childhood care and education for all the children until they complete the age of fourteen years. This Directive Principle signifies that it is not only confined to primary education, but extend to free education whatever it may be upto the age of 14 years. Article 45 is supplementary to Article 24 on the ground that when the child is not be employed before the age of 14 years, he is to be kept occupied in some educational institution. It is suggested that Article 24 in turn supplements the clause (e) and (f) of Article 39, thus ensuring distributive justice to children in the matter of education. Virtually, Article 45 recognizes the importance of dignity and personality of the child and directs the State to provide free and compulsory education for the children upto the age of 14 years.

Even in the case of *Vishal Jeet v. Union of India*²⁸, this Court issued several directions to the State and Central Government for eradicating the child prostitution and for providing adequate the rehabilitative homes well qualified trained senior workers, psychiatrists and doctors. Psychiatrists may help the victims of sexual abuse to live their life as a normal person.

Indian Penal Code 1860:

Nothing is more horrifying than the sexual abuse of child: nothing more reprehensible than a judicial system that subsequently victimizes the victim, police behavior that adds terror to agony. The law itself, coupled with the methods of investigation and cross-examined need to be overhauled, she argues, if we are to take even one small step in aiding an abused child's process of recovery. There are various provisions in Indian Penal code, 1860 relating to combating sexual conduct, These provisions show that this problem was even prevailing in 1860s also.

S.354 Assault or criminal force to woman with intent to outrage her modesty

“Whoever assaults or uses criminal force to any woman, intending to outrage or knowing it to be likely that he will thereby outrage her modesty, shall be punished with imprisonment of either description for a term which may extend to two years, or with fine, or with both.” After the amendment Act, 2013 Section 354 was amended and Section 354A, 354B, 354C & 354D were added. These have made the legislation more efficient.

S.363 Punishment for Kidnapping

The offence is cognizable, bailable, triable by magistrate, non-compoundable and punishable with imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine.

S.366-A & 366-B Punishment for Procurement and Importation of Minor Girl.



The offence is cognizable, Non-bailable, triable by Court of Sessions, non-compoundable and punishable with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine.

S.372 & 373 Punishments for Selling and Buying Minor

The offence is cognizable, Non-bailable, triable by Court of Session, non-compoundable and punishable with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine.

S.376 Punishment for Rape

In, 2013, a drastic change was brought about in punishment of rape vide Criminal Law (Amendment) Act 13 of 2013 so as to deter people from committing such a heinous crime, Section 376 has been divided in two sub sections to fix punishment taking into account gravity and special nature of the case in question. In view of seriousness of the crime in sub-section (1) a minimum of 7 years which may extend to imprisonment of life and fine and in sub section (2) not less than 10 year of imprisonment which may extend to imprisonment of life till death has been provided.

With new modifications 375, 376, 376A, 376B, 376C & 376D were introduced for increasing their efficacy after the amendment Act, 2013.

Amendments made in Law of Rape vide Act 13 of 2013 (Nirbhya Act)

The ordinance has introduced many changes in the Criminal Law, when it comes to sexual offences. One of the important changes is, it made some of the sexual offences gender neutral. It changed rape in to sexual assault as discussed, which makes the offence gender neutral, there were other sexual offences, which were made gender neutral like sexual harassment (Section 354A) and Stalking (Sexual 354D). Taking a serious note of the inadequacy of the law of rape manifested in a number of judgments of the apex court and its failure to safeguard the rights of the innocent victims against the heinous crime against humanity and public criticism, the Parliament in 1983 extensively amended the law of rape so as to make the law more realistic. By the Amendment Act section 375 and 376, IPC were extensively amended and certain more penal provisions were incorporated for punishing those who molest a woman under their custody or care.²⁹

Beside substantive law procedural provisions under law of Evidence and Criminal Procedure Code were also added to strengthen the law. Some of the important changes brought about by the Act 13 of 2013 and other provisions are listed below:

- (i) Consent of a woman of unsound mind: or under intoxication etc.,
- (ii) Burden of Proof of innocence on accused.
- (iii) Prohibition of disclosure of identify of the victim.
- (iv) President Vegetative State.
- (v) Trial in Camera
- (vi) Custodial Rape.
- (vii) Intercourse with wife during judicial separation prohibited.
- (viii) Minimum punishment for rape.
- (ix) Consent of a girl under eighteen years not valid in law.

The Protection of Children From Sexual Offences Act, 2012 (POCSO Act)

The Protection of Children from Sexual Offences Act, 2012 has been drafted to strengthen the legal provision for the protection of children from sexual abuse and exploitation. For the first time, a special law has been passed to address the issue of sexual offences against children.³⁰

The POCSO Act, 2012 defines a child as any person below the age of 18 years and provides protection to all children under the age of 18 years from the offences of sexual assault, sexual harassment and pornography. These offences have been clearly defined for the first time in law. The Act provides for stringent punishments, which have been graded as per the gravity of the offence. The punishment range from simple to rigorous imprisonment of varying periods. There is also provision for fine, which is to be decided by the Court.



VI. CONCLUSION

The study aims to explore various laws of tackle the problem occurred from sexual offences against female child in India. In light of the above mentioned objectives, study intends to test the following hypotheses:

1. Sexual Crimes against female child has emerged with the occurrence of technology due to protection of female child are being violated however it facilitate the society in many aspects.
2. Parliament has enacted various legislations for the protection of female child from sexual offences.
3. Sexual Offences occur due to poverty, illiteracy and lack of awareness.
4. Sexual Offences against Female Child are increasing on very large scale in our society.
5. The present enforced mechanism is insufficient to tackle the issue of Sexual Offences against Female Child, even after making it punishable with death sentence.
6. There are several lacunas in the Criminal Law (Amendment) Act, 2013 and is not adequate to solve the problem of sexual offence against female child.

References

- [1] Law Herald, November 2014, Vol. 7 Issue No.11, The Sound of Silence- Child Abuse in India page 669.
- [2] https://en.wikipedia.org/wiki/Child_sexual_abuse_in_India.
- [3] T.K. Gopal v, State of Karnatka (2000) SC 706.
- [4] https://en.wikipedia.org/wiki/Child_trafficking_in_India .
- [5] https://en.wikipedia.org/wiki/Child_sexual_abuse.
- [6] Judicial officers visit schools to 'teach' law to children, Law Herald, November 2014, Vol. 7 Issue No.11, Page 676.
- [7] M.K. Sharma, "Minimum sentences for offenses in India" P.129
- [8] J.P. Attray "Crimes Against Women" P.12
- [9] https://en.wikipedia.org/wiki/Female_child_molesters.
- [10] Sexual Abuse of the Girl Child – Dr. Ashok Bhiman, Lecturer of Psychiatry, Deptt. of Medicine,
- [11] Nirbhya incident at Delhi.
- [12] https://en.wikipedia.org/wiki/Laws_regarding_child_sexual_abuse.
- [13] Emperor v/s Tatia, 1913 Cr.LJ 858 Bom.
- [14] Girdhar Gopal v/s State, AIR 1958 MB 147
- [15] AIR 1967 SC 63
- [16] AIR 1954 SC 711
- [17] Kenny's Outlines of Criminal Law , 9th Edition, 1966 P.204
- [18] Gazette of India, Notification no. F-58 dated 11-1-1972
- [19] Chiragh 1929, Cr.LJ, 376 (Lah.)
- [20] AIR 2013 SC 2071.
- [21] AIR 1958 SC 143.
- [22] Sanjay Patangrao Jagtap v/s State of Maharashtra, 2004 Cr.LJ 1101 (Bom.)
- [23] Nuvvala Kiran v/s State of AP, 2004 Cr.LJ 1263
- [24] Dhananjay Chatarji v/s State of W.B, 1994 SC 220
- [25] Yashwant Rao v/s State of MP, 1993 SC 520
- [26] Narayanamma v/s State of Karnatka, 1994 SC 728
- [27] https://en.wikipedia.org/wiki/Child_sexual_abuse_laws_in_India.
- [28] AIR 1990 SC, 482
- [29] Criminal Law Amendment Act, 43 of 1983.
- [30] https://en.wikipedia.org/wiki/Child_abuse.