

## CHANGES IN RAPE LAWS WITHIN A PERIOD

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### ABSTRACT

*The article delves into the evolving landscape of rape laws in India over time, with a focus on amendments to the Indian Penal Code (IPC). It traces the trajectory from the taboo nature of discussing Rape to the current environment of open dialogue buoyed by the courage of victims. The narrative underscores significant legal milestones, including the delineation of rape acts and consent nuances in Section 375 of the IPC. Landmark cases such as Mathura and Nirbhaya catalyze legal reforms, prompting amendments to address systemic flaws. Despite progress, challenges persist, as evidenced by cases like Mohd. Habib, which highlights gaps in legal interpretation and application. The article also explores the implications of the 172nd Law Commission report, advocating for comprehensive reforms, including gender-neutral laws and expanded definitions of sexual assault. Throughout, the narrative underscores the gravity of the issue, with high-profile cases like Shakti Mills and Hathras illustrating the ongoing severity of rape crimes. As India grapples with these complexities, the article emphasizes the importance of ongoing dialogue, legal reforms, and societal introspection in combating sexual violence.*

**Keywords:** Rape Laws, Indian Penal Code(IPC), Legal Reforms, Mathura Rape Case, Consent Laws, Gender-Neutral Laws, Law Commission Report, Marital Rape, Nirbhaya Rape Case, Criminal Law (Amendment) Act 2013, Crime Against Women.

### INTRODUCTION

Rape today is a very common topic in India. People are not scared of using this topic as a point of conversation today. However, a few years ago, this topic was not that common and was seen as taboo. Today, it is easy to talk because of people's courage. The courage that rape victims have is that they come out, file a complaint, and talk about the problem they face. However, it was not common in the past for a rape victim to come forward and file a complaint because doing so would make her a topic of discussion among the people; they would say something negative about her, and her chances of getting married would be slim, and so on. According to

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a report by the NCRB Nation Crime Records Bureau, from 2015 to 2020, an average of 33423 rape cases were filed, which is a rape case every 16 minutes. However, not every complaint is true; some rape cases are fake. According to a report by the Times of India, almost 55% of rape cases in Delhi are fake, but we also can't ignore real rape cases. In our legal system, we have some particular sections for Rape, and their definition has continuously changed over the years.

The current definition of Rape comes in Section 375<sup>1</sup> of IPC, which is A man is said to commit "rape" if he--

(a) penetrates his penis, to any extent, into the vagina, mouth, urethra or anus of a woman or makes her to do so with him or any other person; or

(b) inserts, to any extent, any object or a part of the body, not being the penis, into the vagina, the urethra or anus of a woman or makes her to do so with him or any other person; or

(c) manipulates any part of the body of a woman so as to cause penetration into the vagina, urethra, anus or any part of the body of such woman or makes her do so with him or any other person; or

(d) applies his mouth to the vagina, anus, or urethra of a woman or makes her do so with him or any other person,

Under the circumstances falling under any of the following seven descriptions:

First: Against her will.

Secondly: Without her consent.

Thirdly: With her consent, when her consent has been obtained by putting her or any person in whom she is interested in fear of death or of hurt.

Fourthly: With her consent, when the man knows that he is not her husband and that her consent is given because she believes that he is another man to whom she is or believes herself to be lawfully married.

Fifthly: With her consent when, at the time of giving such consent, by reason of unsoundness of mind or intoxication or the administration by him personally or through another of any

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<sup>1</sup> [https://www.indiacode.nic.in/showdata?actid=AC\\_CEN\\_5\\_23\\_00037\\_186045\\_1523266765688&orderno=424](https://www.indiacode.nic.in/showdata?actid=AC_CEN_5_23_00037_186045_1523266765688&orderno=424)

stupefying or unwholesome substance, she is unable to understand the nature and consequences of that to which she gives consent.

Sixthly: With or without her consent when she is under eighteen years of age.

Seventhly: When she is unable to communicate consent.

Mathura Rape Case(Tuka Ram And Anr Vs State Of Maharashtra)<sup>2</sup>

### **FACTS OF CASE**

Mathura, a girl who lost her parents, lived with her brother Gama and worked as a labourer. She became intimate with Ashok, who was the sister's son of Nunshi. They became husband and wife. On March 26, 1972, Gama reported Mathura's kidnapping to the police station. The three persons, along with Mathura, were brought to the police station, where they were recorded. The appellants, who were intoxicated, asked Mathura to wait at the police station.

Appellant No. 1 raped Mathura in a latrine and then raped her again. The accused, who was intoxicated, fondled with her private parts but couldn't rape her. The accused grew suspicious and shouted, attracting a crowd. Mathura was examined by a doctor; the medical test revealed no body injuries, no pubic hair in private parts, and no semen in the vagina, despite semen found on clothes and underwear. And an estimated age between 14 and 16 years. The Sessions Judge found Mathura a shocking liar with false testimony. The Court concluded that Mathura had sexual intercourse while at the police station, but Rape had not been proven. The Bombay high court in Nagpur convicted two policemen, Ganpat and Tukaram, for raping a victim and assaulting a woman with intent to outrage her modesty. The Court differentiated between passive submission and consent, ruling that the girl passively submitted to the accused's actions but did not consent. This decision sparked a nationwide debate on consent laws. The Supreme Court reversed the convictions of two accused policemen in a consensual sexual intercourse case. The three-judge bench ruled that Mathura must have consented due to her absence, no visible bruises, and no marks of injury. Justice A.D. Koshal argued that the story of the girl's strong resistance was false. The Supreme Court restored the district court judgment, confirming the Act as consensual.

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<sup>2</sup> 1979 AIR 185, 1979 SCR (1) 810

## AFTER RAPE CASE

There was widespread criticism of the decision, and most of the women from the upper class started helping Mathura raise her voice because she was from a tribe. A lot of upper-class women came forward and started protests, and after that, an open letter from Professor Upendra Baxi, dean of the University of Delhi Law School, and three prominent law professors. The letter urged shifting the burden of proof from the victim to the accused, harsher punishment for Rape, prohibiting the real name of the victim from appearing in public, and banning two-finger tests on the victim's body. The letter was never entertained by the Supreme Court, but the Parliament of India acknowledged the issue and introduced the Criminal Law Amendment Act, 1983, which declared the alleged intercourse peaceful.

Section 376 of IPC, 1860: Section 376 of IPC prescribes punishment for the offence of Rape. This section was amended, and custodial Rape was made an offence punishable with imprisonment of not less than seven years.

The following sub-sections to Section 376 were also added:

- a. Section 376A- Intercourse by a man with his wife during separation;
- b. Section 376B- Intercourse by a public servant with a woman in his custody.
- c. Section 376C- Intercourse by superintendent of jail, remand home
- d. 376D- Gang rape IV. By virtue of this amendment, the publication of the victim's identities (including her name) was banned and prohibited. (For instance, in the Nirbhaya rape case, the name of the victim 'Nirbhaya' was a court-given name and not her real name)

The amendment prescribed that rape trials should be conducted as in-camera proceedings.

Mohd.Habib Vs State<sup>3</sup>

## THE FACT OF THE CASE

Mohd. Habib, a 21-year-old man, was convicted of raping a minor girl, Aruna Kumari, on August 19, 1980. He was sentenced to life imprisonment and two years of rigorous imprisonment. The appellant challenges the legality of the judgment and sentencing order. The

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<sup>3</sup> 1989 CriLJ 137, 1988 (2) Crimes 677, 35 (1988) DLT 170

main point is that the medical evidence falsified the testimony of the eyewitnesses and the prosecutrix. The appellant's medical examination revealed three simple injuries but no injury on his penis. The prosecutrix's examination showed a bite mark on her right thigh and a ruptured hymen but no bleeding or swelling. The appellant's plea is based on the medico-legal certificates, arguing that if a girl of 7 to 10 years of age is subjected to Rape by a fully developed man, there are likely to be injuries on his male organ. The appellant's counsel relies on *Rahim Beg v. The State of U.P.*, 1972 Cri. L.J. 1260, which states that if a virgin girl of 10 or 12 years is subjected to Rape by a fully developed man, there are likely to be injuries on the male organ of the man.

### **JUDGEMENT**

The Delhi High Court allowed a rapist to go scot-free merely because there were no marks of injury on his penis- which the High Court presumed was an indication of no resistance. The most important facts, such as the age of the victim (seven years) and that she had suffered a ruptured hymen and bite marks on her body, were not considered by the High Court. Even the eyewitnesses who witnessed this ghastly Act could not sway the High Court's judgment.

From the above case, we can still say that there were a lot of flaws in our rape laws because the medical examination had become the way to defame the woman and an obstacle in order to seek justice. Another thing is that if the victim is present and she doesn't have marks on her body like cuts, bruises or anything else, she might have given her consent for the intercourse.

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The 172nd Law Commission report recommends significant changes to the law regarding Rape, including replacing 'rape' with sexual assault', including all forms of penetration in sexual intercourse such as penile/vaginal, penile/oral, finger/vaginal, finger/anal and object/vaginal. Making rape laws gender-neutral, creating a new offence, amending Section 509, and treating marital Rape as an offence. It also suggests deleting section 376A and assuming consent from a victim under the Indian Evidence Act (IEA). The report also suggests a new offence, Section 376E, for unlawful sexual conduct.

State of U.P. v. Chhotey Lal Case Analysis

- Highlights the difference between 'will' and 'consent' in rape cases.
- Nod obtained by a man on false pretext does not constitute 'legal or valid' consent.

- The concept of Rape is influenced by society's faith in compromise, which can affect the judgment of the crime.
- The Supreme Court has reversed High Court decisions reducing sentences under this provision for not providing suitable reasons.
- In 1983, an amendment introduced enhanced sentences for aggravated Rape, including gang rape.
- The change in rape laws improved the situation, making punishment more severe.
- The legislature prescribed a minimum sentence of seven years imprisonment for rapists found guilty.
- Section 376(2) introduced the concept of special kinds of Rape, requiring a minimum of ten years for these cases.

The Court said that "a forcible sexual assault brings in humiliation, feeling of disgust, tremendous embarrassment, sense of shame, trauma and lifelong emotional scar to a victim and it is, therefore, most unlikely of a woman, and more so by a young woman, roping in somebody falsely in the crime of Rape. The stigma that attaches to the victim of Rape in Indian society ordinarily rules out the levelling of false accusations. An Indian woman traditionally will not concoct an untruthful story and bring charges of Rape for the purpose of blackmail, hatred, spite or revenge."...<sup>4</sup>

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State of Maharashtra & Ors. vs. Madhukar Narayan Mardikar<sup>5</sup>

## FACTS

The Respondent was a police inspector when he allegedly visited the hutment of a woman called Banubi and made forceful attempts to have sexual intercourse with her. She resisted the attempt and later made a written complaint against the Respondent, who averred that he was carrying out a prohibition raid at her residence, and some liquor was found at a location near her hutment.

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<sup>4</sup> [https://www.sconline.com/blog/post/2022/10/04/father-accused-raping-sexualassault-minor-daughter-upheld-judgment-testimonyofthevictim-worthyofcredence-punjanandharyanahighcourt-legal-updates-research-news/#:~:text=Chhotey%20La%2C%20\(2011\)%20,woman%2C%20roping%20in%20somebody%20falsely](https://www.sconline.com/blog/post/2022/10/04/father-accused-raping-sexualassault-minor-daughter-upheld-judgment-testimonyofthevictim-worthyofcredence-punjanandharyanahighcourt-legal-updates-research-news/#:~:text=Chhotey%20La%2C%20(2011)%20,woman%2C%20roping%20in%20somebody%20falsely)

<sup>5</sup> AIR 1991 SC 207, (1991) 1 SCC 57

Following Banubi's complaint, a departmental inquiry was conducted. The grounds included the Respondent's attempt at having forceful sexual intercourse with Banubi and the alleged fabrication of documents to prove that he was conducting a prohibition raid in order to cover up his crime. In the course of the investigation, Banubi admitted to being in a relationship with another man while married.

The departmental enquiry found the Respondent guilty of "perverse conduct" and ordered his removal from service. The Respondent filed a writ with the High Court of Bombay, Nagpur Bench, which set aside the order of removal for reasons including, inter alia, the fact that Banubi's moral character was doubtful. The High Court's order was appealed before the Supreme Court.

### **JUDGEMENT**

The Supreme Court ruled in favour of the removal of a police officer, Banubi, due to strong evidence and reasoning. The Court found that Banubi's testimony was corroborated by evidence and that the Respondent suffered from several infirmities, including shifting testimony from two police constables. The Court disagreed with the High Court's assessment that it was difficult to make out a case for the Respondent's guilt based on the provided evidence. The Supreme Court also noted that the High Court had entered into a reconsideration of the evidence, which was beyond their jurisdiction. The Court also emphasized the right to privacy and reliance on the testimony of a victim of assault, stating that even a woman of "easy virtue" is entitled to her privacy. The Supreme Court set aside the High Court's order, reinstated the dismissal of the Respondent, and noted that Banubi had been honest about her antecedents.

The Court said that "Even a woman of easy virtue is entitled to privacy, and no one can invade her privacy as and when he likes. So also, it is not open to any and every person to violate her person as and when he wishes. She is entitled to protect her person if there is an attempt to violate it against her wish. She is equally entitled to the protection of law."

The 172nd Law Commission report aims to replace section 375 of the IPC with a new definition of sexual assault. It defines sexual assault as the introduction of a man's penis into a woman's vagina, including the labia majora, anus, urethra, or mouth, an object or part of the body (other than the penis), an object or part of the body (other than the penis), an object or part of the body (other than the penis), or manipulating any part of a child's body to cause penetration of the



offender's vagina, anus, or urethra. This amendment aims to ensure that sexual assault is defined and addressed in the Indian Penal Code.

Sakshi v. India and Ors<sup>6</sup>

### CASE SUMMARY

Sakshi, an NGO focusing on violence against women, petitioned the Supreme Court of India to declare that "rape" under India's criminal rape law (Indian Penal Code, or "IPC", section 375) includes all forms of forcible penetration. Sakshi claimed that the current interpretation of the law limits Rape to forcible penile/vaginal penetration only).

Issue and resolution:

Definition of Rape. The Court upheld the existing definition of Rape as forcible penile/vaginal penetration only, refusing to include other forms of penetration within the ambit of Rape as defined under IPCs. 375.

However, the Court made camera trials Mandatory.

Nirbhaya Rape case<sup>7</sup>(MUKESH & ANR V. STATE (NCT OF DELHI) & ORS)<sup>8</sup>

### FACTS OF CASE

On December 16, 2012, a victim and her friend were returning home after watching the movie "Life of Pi." They were on an off-duty charter bus with six other men, including the bus driver. The bus moved off-route, and the men shut the doors, leading to a fight. The victim's friend was knocked down with an Iron Rod, and the men gang-raped her for over an hour. As the victim fought back, one of the juvenile attackers inserted an Iron Rod into her private parts, ripping her intestines apart. The bus driver drove the bus all over Delhi after the attack, and both were thrown out of the bus to die at the side of the road. The victim was taken to Safdarjung Hospital, where doctors found only 5% of her intestinal tissue left. She died on December 29, 2012, at Mt. Elizabeth Hospital, Singapore, from sepsis with multiple organ failure following multiple injuries. The victim expressed her desire for justice against the six

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<sup>6</sup> (Crl) No33, 1997

<sup>7</sup> (2017) 6 SCC 1

<sup>8</sup> <https://docs.google.com/document/d/1j3fckTNmeZ9X8yawhk3Cd2thbIDI5Q0bFxJjhViabOI/edit?pli=1>



attackers, including Ram Singh, Mukesh Singh, Akshay Thakur, Pawan Gupta, Vinay Sharma, and the juvenile.

## JUDGEMENT

- All six men, including a juvenile, were convicted in the Nirbhaya Rape Case.
- Ram Singh, a bus driver, committed suicide during the trial.
- Mukesh, Akshay, Pawan, and Vinay were sentenced to 3 years in a Reform Facility.
- The Supreme Court dismissed the review petition filed by Akshay Singh on December 18, 2019.
- The four convicts, who received the death penalty for the gang rape and murder of a medical student, were hanged on March 3, 2020.
- The death warrant was issued after the Tihar Jail Authorities informed the Trial Court that 3 of the convicts had exhausted all legal options.
- Akshay Singh has not filed a Curative Petition or Mercy Plea to the President, which was refused.

## ABOUT THE RAPIST<sup>9</sup>

All the men, in this case, hold unique personality traits, like the juvenile who refused to get out of his juvenile prison and insisted that he be kept in jail for a longer time because it was the first time in his life that he got a bed, clothes, and regular two-time food. After releasing him from jail in 2015, the Delhi government gave him Rs 10,000 and a sewing machine<sup>10</sup> to start a new life, although new reports say otherwise. The reports say that he is now in south India and works as a cook.

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<sup>9</sup> By Rekha Dixit "Nirbhaya case: Tracing backgrounds of the six convicts" <https://www.theweek.in/news/india/2020/03/02/nirbhaya-case-as-hanging-nears-tracing-backgrounds-of-the-6-convicts.amp.html>

<sup>10</sup> OpIndia Staff "What happened to the juvenile rapist of the Nirbhaya gang-rape case: Here are the details that happened to the juvenile rapist of the Nirbhaya gang-rape case: Here are the details" <https://www.opindia.com/2020/03/nirbhaya-rape-case-juvenile-cook-sewing-machine-convicts-hanged/amp/>

**Pawan Gupta**

He used to sell fruits to fulfil the needs of his family. He used to live in a normal house with his brother, father, and mother. He was only 19 years old when he raped Nirbhaya. His age was one of the main reasons that the case took so long to get to its final stages. At the beginning of the case, the lawyer tried to show Pawan as a juvenile. The defence they took for Pawan was that he raped her out of childishness; he didn't know what he was doing.

**Akshay Thakur**

He was 28 years old when he raped her and flew from Delhi to his hometown in Bihar. He was a married man and had a 10-year-old. When the doctor examined the body of Nirbhaya, they found a lot of bite marks, and those were given to her by Thakur.

**Vinay Sharma**

He was 20 years old and was a gym trainer.

**Mukesh**

He was 26 years old, he was the younger brother of Ram Singh, and he said that he was the driver on the bus that night and he didn't do anything wrong with her, but the Court said that they all had common intentions and his lawyer also said that he was sexually assaulted in the jail<sup>11</sup> and we all can't forget his interview with the BBC<sup>12</sup>. He didn't have any regret or shame about it; in fact, he said that any girl from a respectable house won't get out of her house at 9 p.m., and for Rape, the main fault is girls and boys. He said that if he gets the death penalty, the girls in India will get more unsafe because the rapists of those girls will kill them eventually.

**Ram Singh**

He was 30 years old and was the brother of Mukesh. He was an antisocial person; he was a rapist, an alcohol consumer, and a widower. After his arrest, he committed suicide in the Tihar jail.

All the men, in this case, hold unique personality traits, like the juvenile who refused to get out of his juvenile prison and insisted that he be kept in jail for a longer time because it was the

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<sup>11</sup> <https://www.news18.com/news/india/was-i-sentenced-to-be-raped-nirbhaya-case-convict-alleges-sexual-abuse-in-tihar-jail-2476511.html>

<sup>12</sup> <https://www.bbc.com/news/magazine-31698154>

first time in his life that he got a bed, clothes, and regular two-time food. After releasing him from jail in 2015, the Delhi government gave him Rs 10,000 and a sewing machine to start a new life, although new reports say otherwise. The reports say that he is now in south India and works as a cook.

### **AMENDMENT AFTER NIRBHAYA RAPE CASE**

The Criminal Law (Amendment) Act, 2013 was passed in the aftermath of the Nirbhaya case, wherein a female student was gang-raped in December 2012. The Act amended several provisions of the Indian Penal Code, the Indian Evidence Act, and the Criminal Procedure Code. By way of this amendment, several new offences have been recognized and incorporated into the Indian Penal Code, including acid attack (Section 326 A & B), voyeurism (Section 354C), stalking (Section 354D), attempt to disrobe a woman (Section 354B), sexual harassment (Section 354A), and sexual assault which causes death or injury causing a person to be in persistent vegetative state (Section 376A). The Act also amended the already existing offences to make them more stringent. Notably, the definition of Rape in Section 375 was broadened to include acts in addition to penetration. Also, Section 370 was replaced with Section 370 and 370A

### **AFTERMATH OF NIRBHAYA RAPE CASE**

Although the amendment after the Nirbahaya Rape case, the rape laws got strict, the rape offence is still that brutal like the Shakti Mills gang Rape in 2013 5 men, including a Juvenile, raped a 22-year-old Photojournalist at the Mumbai Shakti Mills<sup>13</sup> compound weeks later an 18-year-old telephone operator reported that she was also raped in the same compound of that mill in March 2014 Mumbai court found five men guilty in those two rape cases and awarded death penalty to 3 repeat offenders but in 2021 Bombay high court changed the death penalty to life imprisonment. In the 2016 Jisha rape and murder case<sup>14</sup>, a 29-year-old Dalit law student was found raped and murdered at her home in Kerala. She was stabbed 30 times, and her body was severely mutilated. Her injuries indicated violence and possible torture. Her injuries indicated the presence of alcohol. An Assamese Labourer sole accused was awarded the death penalty. December 2016 Ariyalur gang Rape and murder A pregnant 17-year-old Dalit girl was by a Hindu Munnani leader and 3 of his friend in Ariyalur. They also pulled the Foetus out of her

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<sup>13</sup> Vijay Jadhav vs The State of Maharashtra and another Unit-VII in C.R.No.18 of 2014

<sup>14</sup> Muhammed Ameerul Islam v State of Kerala

womb by cutting her genitalia. The victim was carrying the prime accused child and was insisting on marrying him, but he refused because she belonged to a lower caste. All four accused were arrested. Unnao rape case, a 17-year-old was raped in Up's Unnao the former BJP MLA Kuldeep Singh Sengar was found guilty and sentenced to life imprisonment. Kathua gang rape and murder<sup>15</sup> In 2018, six men and a juvenile raped an 8-year-old Muslim girl near J&K'S Kathua 6 out of 7 accused were convicted and one was acquitted, three were sentenced to life imprisonment, and the others were in jail for 3 to 5 years. In 2019 Hyderabad gang raped and Murdered four people allegedly raped and murdered a 26-year-old Veterinary Doctor in Hyderabad's Shadnagar her burnt body was found the four accused were killed in a police encounter. In the 2020 Hathras Gang rape and murder case, four upper-caste men raped a 19-year-old Dalit girl in Hathras. She died two weeks later in a Hospital. After her death, the victim was 'forcibly' cremated by the cops without the family's consent. The senior officer says that no semen was found in the body of the victim. Later, the four accused were arrested.

## CONCLUSION

After so much years and the changes in our rape laws we can say that the punishment for Rape is better but with the punishment the crime is also getting more serious like in majority of famous rape case its just not a rape case instead it's also a murder case as well and the reason behind most of the rape cases is either love angle or a fight between two parties or a person let his intrusive thoughts win over the morals because as we all know that the women private is somewhat considered sacred people commit Rape just to show their dominance because if the society knows that she has been raped the perspective of society changes toward her like we hear a common thing from the people that she must herself showed interest or she wear small clothes that's why this happened and we haven't even touched the area of marital Rape because it is still unclear that we can consider it as Rape or not because it falls in the ambit of Rape which is without the consent but at the same time the both the person are married to each other recently Allahabad high Court gave the judgement that marital Rape is not a rape<sup>16</sup> whereas after that the Gujrat High Court<sup>17</sup> gave the judgement that marital Rape is also a form of Rape

<sup>15</sup> [https://prsindia.org/billtrack/prs-products/prs-legislative-brief-3028#\\_ednref1](https://prsindia.org/billtrack/prs-products/prs-legislative-brief-3028#_ednref1)

<sup>16</sup>by Rajesh Kumar Pandey "Marital rape not offence if the wife is 18 or above, says Allahabad HC" <https://timesofindia.indiatimes.com/city/allahabad/marital-rape-not-offence-if-wife-is-18-or-above-says-allahabad-hc/articleshow/105870690.cms>

<sup>17</sup> <https://www.thehindu.com/news/national/other-states/rape-is-a-rape-even-if-committed-by-husband-gujarat-hc/article67651738.ece#:~:text=The%20Gujarat%20High%20Court%20has,India%20needs%20to%20be%20broken>

now it depends upon you what you consider is it Rape or not and if it is not Rape then what truly is Marital Rape.

To know more about the crime against women/Sexual Assault, you can refer to the yearly reports of the NCRB Chapter - 3A -- Crime Against Women (States/U.T.s) Chapter 3A.3, 3A.4,3A.5,3A.11 These are the following reports on Rape (the number state-wise)

To know about the crime against Children, refer to the yearly report of NCRB Chapter 4A .4A.9 4A.10 (POCSO act victim ages)

According to a report from NCRB in 2021, India lodged an average of 86 rapes daily and 49 offences against women per hour in 2021, and 99% of sexual assaults are still unreported.<sup>18</sup>



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<sup>18</sup> <https://www.livemint.com/Politics/AV3sIKoEBAGZozALMX8THK/99-cases-of-sexual-assaults-go-unreported-govt-data-shows.html>

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