



# REVIEW OF RESEARCH

ISSN: 2249-894X

IMPACT FACTOR : 5.7631 (UIF)

VOLUME - 12 | ISSUE - 5 | FEBRUARY - 2023



---

---

## OFFENCES AGAINST WOMEN: PATRIARCHAL DISTURBING TRENDS

**Mr. Sandeep Kumar**  
Assistant Professor, IIMT University, Meerut.

### 1 HONOUR KILLING:

The words honour killings' and honour crimes' are being used lightly as a suitable lingo to describe the cases of violence and provocation affected to the new couples intending to marry or having married against the desires of the community or family members. They used more as catch phrases and not as fitting and precise expressions<sup>1</sup>. It is unfair to call cold blooded killings of young persons as honour killing<sup>2</sup>. Human rights define honour killing' as follows – Honour killings are actions of revenge, usually passing away, committed by male family fellows against female family fellows, in response to a belief that the females have offended a family's reputation and have brought disgrace to family unit.<sup>3</sup> A woman can be assaulted by her family for a variety of causes, including: refusing to enter into an agreed marriage, being the target of asexual assault, seeking a divorce—even from an obnoxious husband—or (allegedly) committing infidelity.



This uncovers the core of subjugation of women by a specifically male violence on which the social order is dependent, an order that is shot through with hypocrisy and cowardice<sup>4</sup>. The mere observation that a woman has acted in a way that -dishonours □ her clan is sufficient to generate an attack on her life.<sup>5</sup> Men also targeted by honour killings, but more rarely (in case of homosexuality). The series of honour killings in the nation, in the past era has steered the government to think of new regulations that should be put in place to stop this atrocious crime<sup>6</sup>.

This uncovers the core of subjugation of women by a specifically male violence on which the social order is dependent, an order that is shot through with hypocrisy and cowardice<sup>4</sup>. The mere observation that a woman has acted in a way that -dishonours □ her clan is sufficient to generate an attack on her life.<sup>5</sup> Men also targeted by honour killings, but more rarely (in case of homosexuality). The series of honour killings in the nation, in the past era has steered the government to think of new regulations that should be put in place to stop this atrocious crime<sup>6</sup>.

<sup>1</sup> Law commission of India, 242<sup>nd</sup> Report on -Prevention of Interference with the Freedom of Matrimonial Alliances (in the name of Honour and Tradition): A Suggested Legal Framework||, 2012

<sup>2</sup> *Bhagwan Dass v. State (NCT of Delhi)*, (2011) 6 SCC 396

<sup>3</sup> Stacy L. Mallicot & Connie Estrada Ireland, *Women and crime* 139 (SAGE, New Delhi, 1<sup>st</sup> edn., 2014)

<sup>4</sup> Jasodhara Bagchi, -Freedom in an Idiom of Loss□, in Kavita Punjabi & Paromita Chakravarti (eds.), *Women Contesting Culture—Changing Frames of Gender Politics in India* 220 (16 Southern Avenue, Kolkata, 2012).

<sup>5</sup> -Violence against Women□ and -Honour Crimes□. *Human Rights Watch*. April 6, 2001

<sup>6</sup> Sango Bidani, -Honour Killing in India: An In-depth Study available at:

<http://www.youthkiawaaz.com/2010/07/honour-killing-in-india-an-in-depth-study/>

Thousands of young individuals in India have passed away every year due to Honour Killings' linked to enforced marriages and the country needs to bring together stringent statute to deal

decisively with the heinous crime<sup>7</sup>. In Haryana, Rajasthan and Delhi region, an likely hundred young boys and girls murdered on the orders of so called *khap panchayats*.<sup>8</sup>

In other words honour killing' is to some degree-misleading term for a sacred form of murder occasioned by the attacker's perceived loss of honour, the culprits are generally male and their targets are females. Honour Killing have been well defined as arrays of conduct, cutting across Societies, ethos, beliefs and states and manifested in a range of forms of ferocity engaged in the bulk of cases, against women including murder and involuntary marriages.

Honour Killing considered a delinquency, that threatens the unity and agreement of the community and it acts as a brief preventing woman from progressing in their world. Honour Killing and penance, acknowledged over centuries among a wide varsity of indigenous and spiritual groups all over the world.

The term -honour killing□ relates to killing of both boys and girls in ethos that practice it.<sup>9</sup> Girls of family also aid in honour killings. Materfamilias driven not by personal belief in the misogynistic belief of women as things, but by logical calculations. Sometimes a mother may back an honour killing of an -insulting□ female family fellow in order to preserve the reputation of other person's family members, subsequently many men in these civilizations will reject to marry the sister of a -shamed □ lady whom the family has not chosen to penalize, thus failing to -purify□ the family name. Males can also be the sufferers of honour killings by members of the family of a lady, with whom they alleged to have an inappropriate association<sup>10</sup>.

However cases of honour killings have been stated from all over India, but it is mainly rampant in the Indian states of Punjab, Rajasthan, Haryana,Uttar Pradesh and Bihar, as a consequence of individuals marrying without their family's approval, and at times for marrying outside their class or faith. In disparity, honour killings are uncommon to non-existent inSouth India and the western Indian states of Maharashtra and Gujarat. In some parts of Indian states, notably West

<sup>7</sup><http://www.honourkilling.in/#/?p=125>

<sup>8</sup> S. Vishwanathan, -Honour Killings : What needs to be done□ , *The Hindu (Delhi)*,April 26,2010 <sup>9</sup>Teen Lovers killed in India Honour Killing, *available at: LiveLeak.com*

<sup>10</sup><http://english.aljazeera.net/news/middleeast/2010/08/2010816171115397111.html>

Bengal, honour killings come to an end about a century ago, primarily due to the crusading and guidance of reformists such as Vivekananda, Ramakrishna, Vidyasagar and Raja Ram Mohan Roy.<sup>11</sup> Amongst Rajput's, marriages with members of other social group can incite the killing of the marital couple and close family members. This form of honour killing is credited to Rajput beliefs and customary views on the apparent -purity □ of a heredity.

The Apex court has declared such *Khap Panchayats*' which often decree or encourage -honour killings□ prohibited and a apex court bench of Justice Markandey Katju and Justice G. S. Mishra has said that there is nothing courageous about honour killings or other violence and, in fact, it is not anything but cruel and shocking murder.<sup>12</sup>

The exercise generally related with Muslim ethos, even though there is no backing for the doing in Islam. Moreover, it does take place in other ethos as well. In India, more than five thousand brides murdered yearly because their wedding gift considered not enough.

It also happened in some Latin ethos. In Muslim nations, the exercise is seen by some as a necessary execution of religious directions, and therefore not strictly a matter of reputation. This substantiated by the fact that sometimes individuals who are not close relatives, but who claim enforcement of religious rules as their motive perpetrate the killings against women. In Iraq, for example, armed insurgent groups conduct honour killings on politically active women and those who did not follow a strict dress code and women who are perceived as human rights defenders.

Males repeatedly use honour killings to affirm their prevailing patriarchal standing. Females in the family may support the exercise in order to preserve the reputation of other woman family members and to sphere their chances of successfully married in the community.

Some assert that the exercise goes back to ancient inspirations based on apprehensions about reproductive authority. Females, who considered by the ethnic group to be a factory for making men, were enforced through -honour□ killings to comply with the man's family formation and not to breed outside of the community or the extended family.

<sup>11</sup>-Honour Killings in India□. Daily Life in India. *The Tribune* ,May 2, 2011

<sup>12</sup> J. Venkatesan , -Khap panchayats, illegal: Supreme Court □, *The Hindu (Delhi)*,April 20, 2011

In a culture where fathers decide marriages and money is swapped, a female's desire to select her own husband is a monetary problem, one that can be -translated □ in terms of reputation.<sup>13</sup>

In a breakthrough verdict in March 2010, Karnal district court passed an order of execution of the five criminals of an honour killing, and jailing for life the *Khap* head, who ordered the assassinations of Manoj Banwala and Babli, a male and female of the same clique who fled and married in June 2007. In spite of giving police security on court orders, they were abducted; their disfigured bodies were found a week later in an irrigation waterway.<sup>14</sup> Even after this, the instances of honour killings carry on unchanged and a very latest instance is evident in the form of cruel killing of a young couple in a town near district Rohtak of Haryana.

To avert such delinquencies from being committed, primarily the character and public point of view of the individuals has to be improved. There is no honour involved in slaying of innocent young persons, whose reputation is being talked about. The minute we say that outlook has to be changed, we mean to say that parentages should agree with their kids' wishes regarding marriage, as it is they who have to lead a natural life with their life companion and if they do not have a good understanding, at that time their life will be terrible, that might even end up in suicide. Furthermore, no human being has any right to write death sentence for a colleague on such light-hearted issues.

In 1990, the National Commission for Women established a constitutional body in order to address the problems of honour killings among some cultural groups in North India. This body go through with statutory, legitimate and other provisions as well as challenges females face. The NCW's involvement has added considerably towards the decrease of honour killings in villages of North India<sup>15</sup>.

In June, 2010, analysing the growing number of honour killings, the Apex Court of India issued notices to the Central Government and 6 states including U. P., Punjab, Haryana & Rajasthan to take precautionary actions against honour killings<sup>16</sup>.

<sup>13</sup><http://filipsagnoli.wordpress.com/2008/07/13/human-rights-quote-78-honour-killings/> <sup>14</sup>-Five to be executed for honour killings□. *ABC News*. March 31, 2010.

<sup>15</sup>Women : Government Intervention, *National Commission for Women*

<sup>16</sup>-Honour killing: SC notice to Centre, Haryana and 6 other states. -, *Times of India*" June 11, 2010

### 3.2 Chauvinism and Woman Typecasts

Chauvinism and woman typecasts in media back adverse and indecent thinking about females in the place of work.<sup>17</sup> In the *Globe and Mail*, Canada's National Newspaper, printed an editorial by the paper's Indian columnist Stephanie Nolen titled, *Female face of power reflects change in India*. The editorial is about in what way Nolen sees; it is a puzzle that five of India's top political power negotiators are females. Nolen says, -...it is staggering in the perspective of the extreme discrimination against females that invades every phase of life across class, societies and geography here.<sup>18</sup> Such kind of

comments against females in politics or at any other position of authority be it in business, sports, finance sector or any other field are mutual.

Another such example about all sort of speculative stories revolving around the relationship between the then Union Minister Shashi Tharoor and Sunanda Pushkar did the rounds in the air and print media during whole IPL season before their marriage. The accent was denigrating the character and competence of businesswomen<sup>19</sup>. This kind of investigative journalism has nothing to do with the truth telling function of news media.

Sunanda Pushkar is not the first professional woman who has to face innuendo and sexist remarks, The episode leaves us with some hard questions about the attitude of media towards women and other hurdles that women faces every day at workplace<sup>20</sup>. Their achievements are undermined as always<sup>21</sup>, the media does not attribute a women's success to her talent or hard work but rather consider it as privilege they get by belonging to fair sex<sup>22</sup>. Today media is not a fair messenger but a TRP hunter.

Every now and then the women have to undergo trial by media, which delves into the most private niche of their lives exposing their inside, unmindful of the permanent hurt to their psyche<sup>23</sup>.

<sup>17</sup><http://womeninbusiness.about.com/od/sexism/Sexism-Against-Women-And-FemaleStereotypes.htm>

<sup>18</sup> Mariellen, – India, sexism and the media, Celebrating the women of India, available at:

<http://breathedreamgo.com/2011/06/celebrating-the-women-of-india/>

<sup>19</sup> S. Viswanathan, -Freedom of press and fair trail, *The Hindu (Delhi)*, May 17, 2010

<sup>20</sup> Kalpana Sharma, -Twist ,turns ,decades-ends, *The Hindu (Delhi)*, May 17, 2010

<sup>21</sup> mail bag- S. Umar Farooq Tabrez (Bidar), -Media Madness, *The Hindu (Delhi)* May 16, 2010

<sup>22</sup> mail bag-Sandhya Suresh V.(Thrissur), -Media Madness, *The Hindu (Delhi)* May 16, 2010

<sup>23</sup> mail bag- -Dr. Shaila S. Sheony (Manglore) ,After sensation, *The Hindu (Delhi)* May 16, 2010

Sports women are more prone to sexist remarks and are often given less respect in comparison to their male counterparts. As in women sports comments like nobody really likes women sport's or women cannot play goals' are common and light versions of comments done generally<sup>24</sup>. Women sportspersons have to work on double fronts to prove their metal against their male counterparts. They don't get the same facilities and coaching and even in national events very few audience are found in stands, as there is a common presumption that women are not good sports persons.

Small scale events of women often don't found space even in local newspaper columns, because nobody is ready and interested in knowing their updates, it's the mentality that we need to change. Women sport persons are not acknowledged in country but when they bring medals in some international event, they become stars and everybody is ready to take credit of their success, but the ground reality is that even basic facilities are lacking for women sportspersons. Serious steps are required to improve the situation of women sports.

Women are prone to sexist remarks not only in India but worldwide. The most denigrating and inexcusable example is remark of a radio commentator named G. Gordon Liddy about Judge Sonia Sotomayor insinuating a women's menstrual cycle affects her judgements<sup>25</sup>. During a phone interview on the January 21, 2011 edition of Fox and Friends, Bill O'Reilly call for that increased condemnation of certain traditional females was due to somewhat he described as the-good-looking factor and stated that -the better looking these women are like Michele Bachmann and Sarah Palin, the more the left attacks them. While Fox Network program hosts often make racist, ageist, and sexist remarks, Fox is not the only culprit. Here are public personalities who have made sexist remarks about women.

Such slurs directed against women in power are all too common. We heard them when Janet Reno was head of deptt. of justice, we heard sexist brickbats of all kinds directed at Senator Hillary Clinton during her presidential election campaign. Rush Limbaugh called Senator Mary Landrieu a high class prostitute.<sup>26</sup> Recently sexist remark in the yearly periodical of the leading National Security Guard (NSG) magazine, has hit the headlines. A four-page article titled –

<sup>24</sup> Do You Get Rape-y Comments Too?: On Sexism and Sports Media, *available at*: <http://fromaleftwing.blogspot.com/2011/01/do-you-get-rape-y-comments-too-on.html>

<sup>25</sup>*Ibid*

<sup>26</sup> Supporting Women in Positions of Power, *available at*: <http://www.stopsexistremarks.org/> Female: Deadliest of the Species in Bombshell, released by director- general R. K. Medheker , has raised a scandal with its chauvinist comments against females.<sup>27</sup>

The editorial's writer is a renowned officer - Commandant H. S. Rawat - an NSG group commander who received the Police Medal. The remarks made while clarifying the phenomenon of female suicide bombers.

When we celebrate Women's Day on 6<sup>th</sup> March, we need not overlook that there is another kind of woman, which although is a daughter, sister, mother, wife or any other relation yearning for gender parity, is also the lethal of the species involved in acts of violence, which was earlier supposed to be a male stronghold, the article says. Not only does the officer get the date wrong (Women's Day is on March 8), such comments are in poor taste.<sup>28</sup>The gravity of attack by woman suicide bombers can be more than her male counterpart as she enjoys the gender partiality of being woman, the editorial adds, trying to defend the discourteous humour.

Such situations seem irreverence when copies of this newspaper were given to home minister P. Chidambaram and home secretary G. K. Pillai, besides over 100 envoys from India and abroad and the paramilitary forces, later an NSG spokesperson said Medheker had gone over and done with the article and – when seen in totality, the article seems fine.

Therefore, we can say that in every walk of life women have to face such sexist remarks and innuendo. No one doubts the accomplished women at high positions can ignore such comments and move on; they would not be where they are if they had not endured a career of rising above demeaning remarks. Comments like these happen every day in our workplace, neighbourhood and families, and they do real damage<sup>29</sup>. So, women have to fight back and those at power position help in setting conducive environment at workplace for women.

### 3.3 Virtual-crime against Females

Criminal activities that is customary in nature, such as burglary, fraud, falsification, defamation and malice, all of which are issues of the IPC. The exploitation of computers has also given birth

<sup>27</sup>Aman Sharma, Outrage over sexist remarks in NSG magazine article, *available at*:<http://indiatoday.intoday.in/site/story/outrage-over-sexist-remark-in-nsg-magazinebombshell/1/129380.html>

<sup>28</sup>*Ibid*

<sup>29</sup>*Supra n.225 ,p.133*

to a range of new age delinquencies that are addressed by the I. T. Act, 2000, which has been amended several times and latest in 2008 to bring fast growing cybercrimes under its ambit.

---

**We can generally categorize Cybercrimes in two ways:**

1. The Computer as a Target:-using a computer to attack other computers. e.g. Hacking, Virus/Worm attacks, DOS attack etc.
2. The computer as a weapon:-using a computer to commit real world crimes. e.g. Cyber Radicalism, IPR infringements, Credit card frauds, EFT frauds, Pornography etc.<sup>30</sup> Cybercrimes against women can be characterised under following heads: Amongst the various cyber-crimes committed against persons and humanity at large, the delinquencies which can be cited as specially pointing females are as follows: –
  - Harassment via e-mails: This kind of harassment is not a new phenomenon. Women are victim of e-mail harassment from the very beginning.<sup>31</sup>
  - Email Spamming - Email -spamming<sup>32</sup> denotes to sending electronic mail to thousands and thousands of handlers - related to a chain note. Sending malicious programs through electronic mail. E-mails used to send bugs, Trojans etc. through electronic mail as an attachment or by transferring a link of website, which on visiting downloads malicious code.
  - Defamation can be understood as the intentional infringement of another person's right to his good name. Virtual Defamation happens when defamation takes place with the support of computers and / or the Internet. e.g., somebody prints defamatory material about somebody on a website or sends electronic mail comprising defamatory info to all of that person's associates. Information displayed to a bulletin board can be retrieved by anyone. This means that any person can place defamatory material against you. Cyber defamation is also called as Cyber smearing.
  - Cyber stalking includes following a person's activities over the Internet by posting messages (sometimes threatening) on the bulletin boards visited by the victim, entering the chat rooms visited by the victim, continuously attacking the victim with electronic

---

<sup>30</sup><http://www.cyberlawtimes.com/articles/103.html><sup>31</sup>*Ibid*

mail etc. In general, the harasser aims to cause emotional misery and has no reasonable resolve to his communications.

- Paedophiles: - There are persons who intentionally prey upon children. Especially with a adolescent, they will let the adolescent know that fully realize the feelings towards adult and in specific teen parents. They earn teens confidence and progressively seduce them into sexual or indecent deeds. Paedophiles trap the teenagers by hand out pornographic material, and then they try to run into them for sex or to take their naked photos including their engagement in erotic positions.
- Identity theft is the fastest rising wrongdoing in countries like America. Identity theft occurs when someone appropriates another's own information without their understanding to commit burglary or deceit. Identity theft is a vehicle for committing other kinds of fraud systems.
- Pornography - The literal meaning of the term 'Pornography' is -recitation or displaying sexual acts in order to originate sexual enjoyment over books, films, etc.<sup>33</sup> This would contain pornographic websites; pornographic material created by means of computers and use of internet to transfer and transmit pornographic videos, movies, photographs, writings etc. Adult show business is biggest industry on internet. There are more than 420 million singular pornographic webpages nowadays. Research shows that 50% of the web sites containing potentially illegal contents relating to child abuse were Pay-Per-View'. This shows that rude pictures of teenagers over Internet extremely commercialized. Pornography distributed over mobile phones is now a rapidly increasing industry, -driven by the proliferation in sophisticated facilities that distribute video clips and streaming video, in addition to text and images.<sup>34</sup>
- Breach of Privacy and Confidentiality - Privacy refers to the right of an individual/s to determine

when, how and to what extent his or her personal data will be shared with others. Breach of privacy means unlawful use, distribution, or revelation of personal data like medical records, sexual inclinations, financial standing etc. It means non-disclosure of data to unofficial or undesirable persons. In addition to Individual data some other type of material, which convenient for business and leakage of such material to other persons may cause injury to business or person, such information should be protected.

- Morphing is cutting out the original image by unauthorised operator or sham identity. It was recognized that female's images are downloaded by sham users and again reposted/uploaded on diverse websites by creating sham profiles after cutting out it. This amounts to violation of I.T. Act, 2000 and attracts sec. 43 and 66 of the said Act. The suspicious can also be booked under IPC also. The Times of India informed that, a Delhi-based beautician told the police that her photograph was flashed on a porno portal along with her mobile number.
- Black Mailing - Debarati Halder, advocate, Madras High Court, and an independent counsellor for cyber-crime victims explains that, *"The most common felony is using the victim's picture or name to defame her. Almost every woman victim would have similar tales of harassment. The harasser creates fake, malicious profiles with the victim's picture and invites others to view it, or ask for some favour from the victim and threaten to make such pictures public otherwise. In most cases this turns out to be a revenge-taking act."* Often there is this wrong notion that cyber-crime is alien to e-world in India. Even with security agencies, such as McAfee keeping a tab on cyber predators, the number of cases in Asia has only spiralled<sup>32</sup>. According to a McAfee report, there has been 150% growth of Trojans (programs that contain malicious code which when triggered cause loss or theft of data) using social engineering since 2006. *"Just as every aspect of communication has been changed by the internet, crime has evolved to profit from the millions of potential victims connected to one global network. Online trading sites for identities create a market for thieves to sell to more sophisticated criminals,"* says Kartik Shahani, regional director-India, McAfee.<sup>33</sup>

The fundamental difficulties, which are related with Cyber-Crimes, are Jurisdiction, Loss of evidence, Absence of cyber army and Cyber knowhow judges who are the essential of the day. Judiciary plays a dynamic role in determining the enactment, according to the order of the day. One such point, which needs gratitude, is the P.I.L., which the Kerala High Court has recognized over an electronic mail. At present with the growing arms of Internet, the regional boundaries seems to disappear therefore the idea of territorial jurisdiction as written under Sec. 16 of C.P.C. and Sec. 2. of the I.P.C. will have to give way to other method of dispute resolution.

<sup>32</sup><http://economictimes.indiatimes.com/quickiearticleshow/5657899.cms> <sup>33</sup>*ibid*

Yet again, no section in IT ACT 2000, Vulgarity – individual viewing – is a crime, infect like in IPC 292 all over again if it is ascertained that you have printed, communicated, or caused to be printed in the electronic form only then under Section 67, it can be a crime. Last but not the least, the IT Act 2000 does not declare the usual cyber-crimes like cyber stalking, mutating and email deceiving as crimes.<sup>34</sup>

The fast rise in the usage of computer and Internet has given escalation to new forms of lawbreaking like, sending offensive electronic mails and multimedia emails, kid pornography, virtual terrorism, publishing sexually overt materials in electronic form, video voyeurism, breach of secrecy and seepage of information by intermediary. E-commerce swindles like cheating by personation - generally identified as phishing, identity theft, frauds on online auction sites, etc. Therefore, punitive provisions were necessary to be included in the I. T. Act, 2000. In addition, the Act desired to be technology neutral to make available, alternative tools of electronic signature for bringing coordination with Model Law on Electronic Signatures approved by United Nations Commission on International Trade Law.

To overcome all these problems new additions have been done by I.T. amendment act 2008<sup>35</sup>. Mr. Pawan Duggal, an advocate specialising in cyber law in the Supreme Court once said, *"I have observed that cyber-crime and women in India have a deep relationship. My experience has been that women here by and large shy away from reporting their problems, fearing probable negative media public relations, which may irreparably influence their standings."*

More troubling is the rate at which these threats take place. Cyber criminals currently produce 20,000 to 30,000 new and unique pieces of malicious code every day in order to make it difficult for signature scanners to keep up.<sup>36</sup> So, is it true that women's increasing presence in the professional sphere puts her in the spot?

James Hart, VP marketing with AVG Technologies, a company specialising in computer security software, says, -On any given day, AVG estimates that 8 million to 13 million unique users worldwide are exposed to these kinds of cyber scams.

<sup>34</sup>I.T. ACT, 2000 (Act No 21 of 2000)

<sup>35</sup>Information Technology (Amendment) Act, 2008 enforceable from 5th February 2009.

<sup>36</sup><http://www.cyberlawsindia.net/index1.html>

Hart explains that, -The extra time they use online, without being fully aware of the downsides of the internet, the more susceptible they become. Females need to be mainly vigilant to protect themselves from targeted online assaults. □ A research conducted on seventy-two females by Megha Desai and K. Jaishankar titled *Cyber Stalking - Victimization of Girl Students: An Empirical Study*, states that 12.5% of the women has had intimate association with their cyber stalker in the past, when the stalking started. As per the study, 62.5% of harassment started over electronic mail and online chats.<sup>37</sup>

### 3.4 Casting Couch

The casting couch is a code word for a sociological phenomenon that includes the exchange of sexual favours by an applicant, trainee employee, or subservient to a superior, in exchange for entry into an employment, or for other career expansion within an organization.<sup>38</sup> Careers that are extremely desirable and traditionally demanding to break into, such as the movie, television and music trades, have been the topic of casting couch stories in prevalent culture. Such interchange of favours is misuse of power, and can become a broader sex gossip if deemed exciting.

The -casting couch □ idea in many reverences is connotative of the showbiz industry, however may relate to any business for which entry is highly desired and competitive.<sup>39</sup> If you assumed that the casting couch' syndrome was only restricted to Bollywood in India, you are in for a real surprise. It has come into the notice of The India Street that prominent executives and government bureaucrats of India are also looking out for openings to satisfy their voluptuous cravings within the workplace.

In my view, official authority is the tool that they often use with immunity to threaten the modesty of their female colleagues. Take the case of Parul (name changed) a bright intellectual girl-entered the big bad corporate world at an age of 21 with a promise to prove her talent as a

<sup>37</sup>*Id at n. 234, p. 138*

<sup>38</sup><http://in.answers.yahoo.com/question/index?qid=20080309220229AA0gXJs> <sup>39</sup>*Ibid*

true blue professional. But she was not aware that the professional space dominated by men would demand her dignity and not the intellect to achieve her dreams.<sup>40</sup>

Corporate houses should have a complaint cell dealing with the problem of sexual harassment. What's more, working women have to be made aware of their rights. Last but not the least; it is of



paramount importance that companies in India incorporate well-defined policies against sexual indiscretion within the office space.<sup>41</sup>

If you thought that the 'casting couch' theory was created by Page 3 (read media), then check this out. In a report titled, 'The Changing Status of Women in West Bengal (1970-2000): The Challenge Ahead', the West Bengal Commission for Women acknowledges sexual and non-sexual exploitation of women in Tollywood. The report, not only sheds light on issues like dowry deaths and domestic violence against women, but also delves into the intrigues of Tollywood.

A telling observation from the chapter on films compiled by former CPI-M MP Malini Bhattacharjee:<sup>42</sup> 'Exploitation at the Tollygunge film industry is both at the sexual and non-sexual levels. The report adds, 'At a time when this new wave of films is depicting professional women positively on screen, a survey of 25 film personalities of Tollygunge indicates that working conditions in the Bengali film industry have deteriorated substantially for women in the last two decades of the 20th century...Cinema is increasingly emerging as a lucrative business for easy and quick money.'

The problem of the casting couch in Bollywood looks like, have raised its ugly head, if accusations by artiste Payal Rohatgi to be understood. The actress, who was seen in movies like *Plan*, *36 China Town* and *Yeh Kya Ho Raha Hai*, asserted that she was propositioned by Administrator Dibakar Banerjee, to acquire a title role in his much expected venture, *Shanghai*'.

---

<sup>40</sup><http://colton.sulekha.com/blog/post/2007/09/casting-couch-in-corporate-world-of-india.htm> <sup>41</sup>*Ibid*

<sup>42</sup>Ajanta Chakraborty, 'How secure are women in Tollywood' **available at:** <http://timesofindia.indiatimes.com/city/calcutta-times/How-secure-are-women-in-tollywood/articleshow/1007719.cms>

In case of reel to real life, Payal Rohatgi alleged that the *Love, Sex and Dhokha* director had in fact dropped by her household and asked her for voluptuous favours. She alleged, when she declined to do so, he nixed her from the movie.<sup>43</sup>

The casting couch has all the time present in Indian sports; however, it takes a random whistle blower like female hockey player Ranjitha Devi to take the cover off from this demeaning exercise. She blamed chief instructor of the Indian women's hockey squad Maharaj Kishan Kaushik (since resigned/sacked) of harassing her with open voluptuous demands and oral sex dialogs. When sensational parts of the Bill Clinton-Monica Lewinsky matter were rampant like Bushfire through the United States, a wag had recommended that the Oval Office should be retitled as the Oral Office. Ranjitha Devi's accusations against Kaushik have held, as Hockey India has taken cognizance of her four-page handwritten grievance and acted on behalf of the statement of its five-member board set up to probe the case to seek more enquiry by the Delhi Police and the Union Ministry of Youth Affairs and Sports to get at the bottom of the incident<sup>44</sup>. Interestingly, a few months ago, goal-keeping instructor of the females' hockey team Edward Alloyicious had been kicked out when he misbehaved with a Punjab goalkeeper.<sup>45</sup>

Casting couch exists in each and every industry but in our industry it is done under a guise. Everyone is aware about the misdemeanours taking place but no one will admit to it. They all want to reach the top, and all this helps in making their chances better. As far as laws go, it has always been lenient towards the celebrities. They may not always be at fault, but when they are, then it is extremely unfair that they walk scot-free while others have to pay a heavy price and jailtime for their crimes. I think this sentence against Anand Jon will act as a deterrent for others in future and they will think twice before committing such heinous crimes in future.<sup>46</sup>

The industry has seen many cases of sexual harassment for years. This only shows that how much of it is being affected and ruined by the problem. The main reason for it to happen is the ever increasing competition and the glamour that surrounds it. Today, everyone wants everything fast and in the process forget about morals and norms of the society. It can be kept in check by

<sup>43</sup> -Payal Rohtangi accuses director Dibakar Of demanding sexual favor, *Indian Express (Delhi)*, March 16,2011

<sup>44</sup><http://www.indianexpress.com/news/dibakar-wanted-to-see-my-bare-body-payal-rohatgi/763712/>.

<sup>45</sup><http://www.tribuneindia.com/2010/20100801/spectrum/main1.htm>

<sup>46</sup> mail bag -Supriya Joshi, content writer, *available at:*<http://timesofindia.indiatimes.com/city/calcutta-times/How-secure-are-women-in-Tollywood/articleshow/1007719.cms>

having stringent laws but self-governance is the best possible solution, as such incidents happen under cover. I think law is equal to all and celebs are always under scanner for small things, we need to find though a solution which will keep things in control.<sup>47</sup>

Exploitation in return of a favour is a part of the glamour industry. The very fact that there are people who are willing to stoop to any level to get a role in a movie or become a model implies that someone on the other side is taking advantage of this. Also, one keeps hearing about such incidents now and then which proves it. I think people should come out and report it rather than stay mum in the fear of being shunned by the society. Our society can be very judgmental at times but culprits need to be punished. And as far as justice is concerned it needs to be faster, not only in such cases but in general we need a change.<sup>48</sup>

Indian-American fashion designer Anand Jon Alexander has been sentenced to a minimum of 59 years in prison by a court for preying upon aspiring models and even sexually assaulting them. Such kinds of cases are common in India as well. And the laws here are not stringent at all. Those found guilty get away very easily, thanks to the many loopholes in our judiciary system. But then at the same time, I would not only blame the judiciary but also our social norms.

Victims still don't come out in the open and admit that they have been sexually molested or have been mistreated. They are scared that their family honour will be tarnished and they are worried about the social stigma. Worse, they end up withdrawing the cases. Family name and honour continues to remain a prime concern for girls in our country. The fault lies with the society and legal norms. We need to revamp the system and through the right education, we can help change the society's attitude.

Sexual harassment or assault is not new; we have similar cases from across the sectors all over the country. It is not just limited to the glamour world but can be found even in villages. In India, women are too scared to come out and complain about sexual harassment unlike the West. Most of these women-aspiring models, actors-come from small towns and prefer to stay quiet because they don't want to be stigmatised by the society.

<sup>47</sup> mail bag-Haresh Nayak, senior manager, *available at:* <http://timesofindia.indiatimes.com/city/calcutta-times/How-secure-are-women-in-tollywood/articleshow/1007719.cms>

<sup>48</sup> mailbag - Mustafa Syed, media manager. *Id at p.142*

Another reason why women avoid coming out is the way our courts function. The cases here go on for years. No doubt, that today we have fast track courts but even they take a long time to give a judgment.

Also, we are not sensitive towards such issues. Few bold women who come out are questioned on the grounds of morality and then these cases are sensationalised by the media. Therefore, we need to change our outlook towards such issues and also change the way our courts function. Until and unless, this is done, women will prefer to stay quiet and get victimised by powerful people.<sup>49</sup>

Agrees filmmaker Aparna Sen, who was interviewed by the Commission, -I have heard about the casting couch syndrome from so many people. It is extremely possible that there are women in the industry who willingly get exploited. Nilanjana Gupta, reader, Jadavpur University's English department, who conducted the survey for the Commission, says, -We interviewed women actors,

directors, technicians, scriptwriters and their male counterparts who recounted their varied experiences.

According to the report, -Two eminent actresses of the past complained that many times they were not paid their full contractual amount on flimsy grounds.□ Confirming this, Sen says, -It happened to Sumitra Mukherjee. I was so outraged at that time that I refused to act in the film. Sumitra reminded me of the incident on the sets of -Paromitar Ek Din.<sup>50</sup>

### 3.5 Eve teasing

Eve teasing is a synonym used in India for sexual harassment at public places, street harassment or molestation of females by men, with Eve being a reference to the theological Eve, considered a delinquent related to wrongdoing in adolescence. It is a practice of sexual violent behaviour, which ranges in brutality from sexually evocative comments, touching in public places, taunts, to outright groping.<sup>51</sup> Sometimes it referred to with a modest suggestion of innocent pleasure,

<sup>49</sup> Flavia Agnes, lawyer and social activist. *Id at p.143*

<sup>50</sup>Available at: [ajanta@chakraborty.timesgroup.com](mailto:ajanta@chakraborty.timesgroup.com)

<sup>51</sup>Harassment in public places a routine for many *The Times of India*, Delhi, February 15, 2009

making it appear harmless with no consequential responsibility on the part of the wrongdoer.<sup>52</sup> Lots of feminists and charitable organizations have recommended that the expression substituted by a more suitable term. According to them, since the semantic background of the word in Indian English, eve teasing refers to the temptress nature of Eve, assigning accountability on the female as a tease, as though the violent reaction of the men was normal rather than felonious<sup>53</sup>.

Eve-teasing has been a extremely tough delinquency to prove, as wrongdoers often conceive inventive ways to attack females, even though numerous feminist authors term it as -little rapes□<sup>54</sup>, and generally happen in public places, streets, and public means of transport.<sup>55</sup>

In a latest incident of eve-teasing a sportswoman was thrown out of train in Uttar Pradesh, owing to which she lost her limb.<sup>56</sup>In another outrageous instance, a drunk CRPF jawan shot dead a national-level kabaddi sportsperson, who supposedly declined to disclose her cell phone number in spite of his insistent. Immediately after that, he shot himself.<sup>57</sup>

A Dalit youth was ostensibly shot dead when he opposed the eve-teasing of his sister by some people at Gadla rural community in the Muzaffarnagar district, police said. The victim, Mohit, apparently shot dead when an argument broke out amid him and the adolescences after they passed vulgar remarks at the former's sister, said officials. Police has detained one of the suspect, Kallu Singh, and a case registered alongside two others who are escaping, officials said.<sup>58</sup>

Eve teasing is a synonym used for sexual harassment, street harassment and indecent behaviour. Eve teasing is a main problem in India, particularly in cosmopolitan cities. The capital of India, leads other cities when it comes to wrongdoing against women. Large percentages of Indian

<sup>52</sup>Shashi Tharoor, *The Elephant, the Tiger, and the Cell Phone: India: The Emerging 21st-Century Power* 454- 455(Arcade Pub., 2007. ISBN 1559708611)

<sup>53</sup> Geetanjali Gangoli, *Indian Feminisms: Law, Patriarchies and Violence in India* 63-64,(Ashgate Publishing, Ltd.,2007. ISBN 0754646041).

<sup>54</sup> Russell Dobash, Harry Frank Guggenheim Foundation, *Rethinking Violence Against Women* 58(SAGE, 1998,ISBN 0761911871)

<sup>55</sup> Farah Faizal, Swarna Rajagopalan, In *Public Spaces: Security in the Street and in the Chowk, Women, Security, South Asia: A Clearing in the Thicket* 45, (SAGE, 2005. ISBN 0761933875)

<sup>56</sup>*The Hindu (Delhi)*, April 12, 2011

<sup>57</sup> Shoumojit Banerjee Patna:An inebriated CRPF jawan shot dead a national-level kabaddi player , *The Hindu(Delhi)*, Feb. 11 ,2011

<sup>58</sup> Dalit youth shot dead for opposing eve-teasing, *The Times of India (New Delhi)*, May 26, 2011.

available at : [http://articles.timesofindia.indiatimes.com/2011-05-26/india/29585710\\_1\\_eveteasing-dalit-youth-lewd-comments](http://articles.timesofindia.indiatimes.com/2011-05-26/india/29585710_1_eveteasing-dalit-youth-lewd-comments)

women have encountered or are facing this nuisance. Whether it is a public transport system or public space or shopping center or movie theatre complex, females find themselves at risk to the menace of eve teasing in all places. Eve teasing is complex problem and it needs more responsiveness than what it actually has.

As we know, the word 'eve teasing' is an Indian origin. The word itself has some flaws. Eve denotes temptress and the word actually connotes that eves (women) lure or incite people for vulgar remarks and behaviours. As luck would have it, it also means females cause the delinquent and are a target to it. That is almost like accusing the sufferers for their miseries. It also portrays an element of male narrow-mindedness. Examining further, the problem of eve teasing took its origin during the sixties, when females started to go to schools, colleges and jobs. A social transformation was taking place in traditional India. The colossal crusade of women liberation came with its own side effects and one of them was eve-teasing.<sup>59</sup>

Eve teasing is a less severe expression for molestation or sexual provocation, specifically in India and Pakistan. The cases of this street sexual exploitation may vary from sexually coloured statements to outright efforts of molestation or rape. The problem of eve teasing is a rising concern in most south Asian countries and consist of a number of matters such as the security of females and young girls, the safety of foreigners visiting in this part of the world, etc. Unnecessary to mention, eve teasing is a social obscenity the origin of which deeply imbedded in the sexually repressive social organization of many third world nations.<sup>60</sup>

Eve teasing is an abuse of a female's basic right to live in self-respect. Ladies have at all times subject to eve teasing and the trend regrettably, carry on even today. In fact, number of wrongdoing against the females is persistently increasing. The cases to eve teasing, sexual harassment, rape, molestation etc. are on record high. Ironically, the concept of female's liberation has carried with it numerous numbers of sexual delinquencies against them. When it comes to eve teasing, no matter what are the educational experience, class, appearance and race of females, many of them have gone through these hostile experiences. Study displays, virtually

---

<sup>59</sup> <http://www.eveteasing.org/eve-teasing-problem.html>

<sup>60</sup> <http://www.bestindiansites.com/for-grown-ups/eve-testing.html>

90 percent of university going teenagers have experienced some type of sexual harassment at different points of period.<sup>61</sup> Truth cannot be more agonizing than that.

Indian law identifies eve teasing as sexual harassment, which reflected as a unlawful activity. Indian law does not give reference to the term 'eve teasing'. In recent times, the laws made rigorous, so that victim could take remedy under the act. Indecent gestures, recitation or comments can land the criminal into jail for a maximum term of three months. That is not all, even showing pornographic things, movies, books etc. to a teenager can invite two years of harsh imprisonment beside with fine of Rs. 2000.

Unfortunately, not many females register grievances of eve teasing or harassment for the reason of the fear of embarrassment and public exposure. Many females who were sufferer of sexual harassment commit suicide for the reason of persistent social insults. The public is not kind to the

sufferers. The problem here is of mind-set. Even if the rules are there, one wants to pursue them with full force. It is not likely for every sufferers to stand in the magistrate's court and answer uncomfortable questions. Many times, parents themselves request their daughters to overlook the instance as it can cause them public humiliation and embarrassment.

Nevertheless, we must appreciate the stand taken by diverse NGOs and social welfare groups who are trying to teach society about the serious concerns of eve teasing. They are also showing programs to sensitise the men who are susceptible to such behaviour. The emphasis here is on altering the mind-set and respecting the females. The approach towards females needs to transform, only then we can think of gender parity in the real sense of the word.

### 3.6 Stalking

Stalking is a phenomenon, which could turn out to be a terrifying experience for any female. It is common to listening the mothers, while teaching their teenage daughters to be cautious of outsiders who might trail them. Young women who reside alone in metro towns prove to be easy targets and are susceptible to be stalking. Even older ladies come across with such behaviour while walking/jogging or even shopping. A colleague may even stalk teenagers pursuing their School education. A female belonging to any age group is vulnerable to it. It has realized in

---

<sup>61</sup><http://www.eveteasing.org/laws-against-eve-teasing-in-india.html>

numerous cases that before committing a sexual transgression or initiating a physical violence the culprit stalks the victim. In addition, the stalker might throw acid on the face of the victim to take vengeance of some kind.<sup>62</sup> Stalking can be defined as the intentional and frequent following, observing, and / or harassing of another individual. Most of the time, the purpose of stalking is to effort to force a bond with somebody who is reluctant or otherwise unattainable. Unlike other delinquencies, which generally include one act, stalking is a sequence of activities that take place over a period. Even though stalking is unlawful, the actions those add to stalking are commonly legal, such as gathering data, calling somebody on the mobile phone, sending gifts, emailing or direct messaging. Such engagements by themselves are not commonly offensive, however can become offensive when frequently reiterated over time.<sup>63</sup> The killing of 20-year-old Delhi College student Radhika Tanwar by her stalker highlights the predicament of a huge number of women in India. A man who had allegedly been stalking her for the past three years shot Radhika dead in broad daylight.<sup>64</sup> In the deficiency of a precise anti-stalking law in the state, females have little choice other than overlooking the unwelcome advances of stalkers. The best that the police can do in routine stalking instances is jail the stalker for 24 hours; accusing the delinquent under laws for sexual harassment not amounting to assault being insufficient. In 2008, the Bombay high court had reverberated the necessity for a strict anti-stalking law, observing that the act of stalking extends to severe psychological and emotional pain for the sufferers. As in Radhika's case, stalkers may proceed to murder (or rape). Therefore, it is vital to nip the difficulty in the bud. With changing socio-economic developments, females gradually becoming an essential part of the workforce, it is vital to safeguard women's security in the public domain. At present, the law does not even recognise stalking as a delinquency. Therefore, actions such as setting up anti-stalking lockups are largely unproductive. It is significant to have a refined law that acts as a preventive and takes cognizance of certainties such as virtual stalking, which also is on the increase. In states, such as the United States and Canada, anti-stalking acts provide for fines and warning orders that bar stalkers from coming within a specified distance of the sufferer<sup>65</sup>. Our legislators would do well to take the first step.

---

<sup>62</sup><http://www.mightylaws.in/208/stalking-phenomenon-legal-status-preventive-measures>

<sup>63</sup>[http://en.wikipedia.org/wiki/Eve\\_teasing](http://en.wikipedia.org/wiki/Eve_teasing)

<sup>64</sup>*The Hindu (Delhi)*, Mar 15, 2011

<sup>65</sup> <http://m.timesofindia.com/PDATOI/articleshow/7702497.cms>

Astonishingly there was no separate punitive provision for the nuisance of stalking in India until 2013. Even if the police have to file an FIR, they record it under sections covering indecency, outraging modesty of a woman or criminal threats, depending on the deeds of the stalker. It was for the first time by Criminal Law (amendment) Act, 2013, stalking added as a separate crime. In countries like United State of America, the acts relating to stalking are strict. Severe punishments recommended for those who indulge in such disgraceful behaviour.

### 3.7 Acid Attacks

When acid thrown on an individual, the outcome can be shocking. Nitric, hydrochloric, or sulphuric acids all have a disastrous effect on human skin. It causes the skin flesh to melt, often revealing the bones under the flesh, at times even dissolving the bone. As soon as acid spills on the eyes, it harms these vital organs forever. Numerous acid attack fighters have lost the use of one or both eyes. The sufferers devastated physically, mentally and publically.<sup>66</sup>

Gathering information from newspapers and NGOs, the authors found that at least 1500 acid attacks occurred in India in 2014-18; The State of U.P. has reported most number of cases in the year 2017 whereas state of Delhi is the second as per the NCRB report 2016. Many attacks never reported, on the other hand, states themselves do not keep records; so the authors note that actual figures to be expected much higher.

An acid attack on your physique would dramatically transformed your life cycle. Most survivors of an acid attack, forced to give up their schooling, their career and other essential actions in their lives. This is because recuperating from the suffering takes up most of their time and due to the mutilation, they have to endure incapacitates and handicaps them in every feasible way.<sup>67</sup>

The burns left by acid are not just skin deep, sufferers are most often confronted with social segregation and exclusion that further harms their self-respect, self-confidence and earnestly damages their professional and personal prospect. Females who have endured acid attacks have great struggle in finding work and if single, as many sufferers tend to be, they have very slight chance of ever getting married, which in a state like ours is communally segregating.

---

<sup>66</sup> Lauren Gold, The media event was hosted by the Cornell Law School, *available at* : <http://www.corrosion-doctors.org/Acids/acid-attack-1.htm>

<sup>67</sup>*Id at p.151*

The pictures are horrifying; the experience is unconceivable. However, mutilating and lethal acid attacks on females are on the upsurge, according to a new inclusive information released on January 27, 2017. In addition, even though international human rights regulation call for states to take action against them, considerably more needs to done.<sup>68</sup>

The sufferers attacked for many motives. In some incidents, the violence takes place as a adolescent or female has rejected the sexual advances of a man or has rejected a offer of marriage. Lately, however, there have been acid attacks on kids, older females and sometimes men. These assaults are often the outcome of domestic or land disputes, dowry demands or a craving for vengeance. Causes for acid attacks throughout the years, the highest rate of incidencetook place over Land Quarrels and Family clash, the next highest rate of these ruthless cases are due to rejection of relationship/sex all over the state.

In a shocking incident, a 22-year old female underwent grave burn injuries when a middle-aged person poured acid on her for apparently declining his offer for marriage at Aranmula, Kerala. The sufferer, Anjali Krishana, a staff of a private school, admitted to Medical College at Kottayam along with

her mother who tried to protect her from the violence. As per the family sources, the man, a divorcee, used to bother her with marriage offer. However, the female and her family had not displayed interest in the association.<sup>69</sup>

In another case, police force have launched a manhunt for anonymous biker who allegedly threw acid on a 25-year-old female while she was roaming in an auto rickshaw. The case took place in Dharavi Mumbai, while Jamuna Dera was returning to her Chembur home from Kherwadi. An investigator said they suspect the delinquency committed by somebody well known to the sufferer who works at a bar in Kherwadi. -It could be the sufferer's boyfriend or some client who wanted to avenge for an unknown reason. □<sup>70</sup>

A monotonous drive back home after taking coaching turned horrific for two young females in Jaipur, when two motorcycle-borne adolescence flung acid on their faces. The assailants detained

---

<sup>68</sup> Countries, businesses must act to combat acid attacks on women, report asserts, Jan. 27, 2011, *available at*

:<http://www.news.cornell.edu/stories/Jan11/NYCAcidViolence.html>

<sup>69</sup> <http://www.ndtv.com/article/cities/acid-attack-on-girl-for-rejecting-marriage-proposal-78009?cp>

<sup>70</sup> V Narayan, Bar girl sustains 20% burns in acid attack, TNN Apr 6, 2011, *available at*:

[http://articles.timesofindia.indiatimes.com/2011-04-06/mumbai/29387923\\_1\\_bar-girl-burns-inacid-attack-dharavi](http://articles.timesofindia.indiatimes.com/2011-04-06/mumbai/29387923_1_bar-girl-burns-inacid-attack-dharavi)

within 60 minutes, after passer-by rushed the sufferers to the Sawai Man Singh Hospital and informed the police force. The two females aged 20 and 21 were walking past a busy market, when they were interrupted by the suspect. Cops hinted at a rejected wedding offer as the motive behind the violence.<sup>71</sup>

A combined effort by the Avon Center, the New York City Bar Association, the Cornell International Human Rights Clinic and the Virtue Foundation, is the earliest to establish that acid attack is a practice of gender-based violence barred by the Convention on Elimination of Discrimination against Women (CEDAW). Parties to CEDAW, including India, are indebted in international law to make efforts to avert attacks, bring offenders to justice and pay compensation to sufferers.

It highlights the role of industries, many of which use acid in trade. -Proof proposes that acid assaults take place at higher rates proximate areas where manufacturing units that use acid are situated. □ Establishments that produce and dispense acid should make sure proper permitting, safe management, storage, marking, transfer and clearance processes, the information states<sup>72</sup>.

The information indorses that governments need certifying and safe handling processes by manufacturers, suppliers and other industries that use acid; necessitate markers cautioning consumers about the risks of acid and about fines for misuse; and prohibit domestic use of concentrated forms of acid.

---

<sup>71</sup> Held for acid attack in Jaipur, Feb 6, 2011, *available at*: [http://articles.timesofindia.indiatimes.com/2011-02-06/jaipur/28353071\\_1\\_acid-attack-govind-jaipur](http://articles.timesofindia.indiatimes.com/2011-02-06/jaipur/28353071_1_acid-attack-govind-jaipur)

<sup>72</sup> <http://www.corrosion-doctors.org/Acids/acid-attack-1.htm>