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# **ANALYSIS OF GENDER BASED PROVISION IN BNS, NEED FOR GENDER NEUTRALITY FOR CRIMINAL LAW**

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## **ABSTRACT**

Gender justice is a cornerstone of the Indian Constitution, ensuring equality before the law. However, certain provisions under the Bharatiya Nyaya Sanhita (BNS) reflect a gender-specific approach that disproportionately Favours women, leading to wrongful prosecution of men. This paper critically examines BNS's few Sections, identifying their inherent gender bias and constitutional violations under Articles 14, 15, and 21.

The study adopts a doctrinal methodology, analysing legal precedents, case law, and comparative legal frameworks from jurisdictions that have implemented gender-neutral legal systems. Through an examination of landmark cases such as *Rajesh Sharma v. State of UP* (2017), *Arnesh Kumar v. State of Bihar* (2014), and *Preeti Gupta v. State of Jharkhand* (2010), the research highlights the increasing misuse of these laws. Real-life instances illustrate how false allegations under these sections have resulted in wrongful arrests, reputational damage, financial ruin, and mental distress for accused individuals.

By assessing the broader implications of gender-specific legal provisions, this paper advocates for legal reforms that prioritize equal protection for all individuals, regardless of gender. The proposed reforms include making these sections gender-neutral, imposing stricter evidentiary requirements, implementing legal safeguards against false accusations, and promoting judicial training to prevent bias in legal proceedings.

This research contributes to the discourse on gender justice by arguing that a truly equitable legal framework should not presume guilt based on gender but should provide legal recourse for all victims. The conclusion underscores the need for legislative intervention to amend the

identified provisions, ensuring that India's legal system aligns with constitutional principles of equality and fairness.

**Keywords:** Gender Justice, Misuse of Laws, Bharatiya Nyaya Sanhita, Gender-Neutral Laws, Equality, Legal Reforms

## 1. INTRODUCTION

### 1.1 Background of the Topic

The Indian legal system has undergone significant reforms with the introduction of the Bharatiya Nyaya Sanhita (BNS), replacing the colonial-era Indian Penal Code (IPC). While these reforms aimed to modernize and streamline criminal laws, several provisions continue to reflect a gender-specific approach, assuming men as perpetrators and women as victims. This gender bias in legal provisions has led to misuse, wrongful accusations, and a lack of legal remedies for male victims.

Laws designed to protect women from crimes such as sexual harassment, deceitful promises of marriage, stalking, and domestic abuse often fail to recognize that men can also be victims of similar offenses. As a result, legal gaps exist where women who engage in the same conduct face no legal consequences, violating constitutional guarantees of equality and fairness.

### 1.2 Importance of Gender-Neutral Laws in India

Gender-neutral laws ensure that justice is applied equally to all individuals, regardless of gender. While it is undeniable that crimes against women are a serious issue, the absence of legal provisions for male victims and the potential for misuse of existing laws undermine the credibility of the justice system. The lack of accountability for false accusations has resulted in reputational damage, loss of employment, and even wrongful imprisonment of innocent men. A truly equitable legal framework should protect all citizens, acknowledging that both men and women can be victims and perpetrators of crime. Adopting gender-neutral laws would strengthen the legal system by preventing discrimination, ensuring accountability, and upholding constitutional principles such as equality before the law (Article 14) and the right to life and personal liberty (Article 21).

### 1.3 Research Questions

This research seeks to address the following questions:

1. Do the gender-specific provisions in the BNS violate fundamental rights under the Indian Constitution?
2. How have these laws been misused in real-life cases, leading to wrongful prosecution?
3. What are the consequences of excluding male victims from legal protection?
4. How can legal reforms ensure gender neutrality while maintaining protection for genuine victims?

#### 1.4 Hypothesis

- **The gender-specific provisions in the BNS violate fundamental rights under the Indian Constitution**, particularly Articles 14, 15, and 21, by failing to provide equal protection under the law.
- **Gender-specific laws under the BNS have been misused**, leading to wrongful prosecution and false accusations, which undermine the integrity of the justice system.

## 2. LITERATURE REVIEW

Several studies discuss the misuse of gender-specific laws in India. Reports from the Law Commission of India and judicial precedents acknowledge that these laws have been weaponized in certain cases. Supreme Court judgments, including *Rajesh Sharma v. State of UP* (2017) and *Preeti Gupta v. State of Jharkhand* (2010), have raised concerns about false accusations. This paper builds upon existing literature to emphasize the need for legal neutrality.

The debate over gender-biased legal provisions in India has been an ongoing concern among scholars, legal experts, and policymakers. Various studies and reports, including the Justice J.S. Verma Committee Report (2013) and the Law Commission of India's 273rd Report (2018), acknowledge the potential for misuse of gender-specific laws. These reports suggest that while laws protecting women from violence are crucial, they should not be designed in a manner that excludes male victims or enables their misuse against innocent individuals.

Malhotra (2022) critically examines the discriminatory application of criminal laws in India, arguing that sections of the BNS, like their predecessors in the Indian Penal Code, fail to acknowledge male victims. Singh (2020) highlights international best practices in gender-neutral legal frameworks and proposes that India should align its laws with global standards, ensuring that protections extend to all individuals. Das (2019) provides a sociological



perspective, discussing how false allegations affect not only the accused but also dilute the strength of genuine cases, thereby undermining the purpose of protective laws.

Judicial precedents reinforce these concerns. The Supreme Court, in *Arnesh Kumar v. State of Bihar (2014)*, warned against the automatic arrest of accused individuals in gender-based cases. Similarly, *Rajesh Sharma v. State of UP (2017)* introduced guidelines to prevent the misuse of cruelty and dowry laws. Courts have repeatedly recognized the need for safeguards to prevent false accusations from being weaponized.

This literature review highlights the necessity of gender-neutral legal reforms, demonstrating that the issue is not merely theoretical but has real-life implications for justice and constitutional fairness. The following sections build upon this foundation to advocate for a legal framework that ensures equality for all individuals, irrespective of gender.

### 3. ANALYSIS OF SPECIFIC BNS SECTIONS AND THEIR MISUSE

Each section of the Bharatiya Nyaya Sanhita (BNS) discussed below punishes only men, creating a legal vacuum where women are not held accountable for the same conduct. The analysis includes case law examples, real-life misuse stories, and constitutional violations.

#### 3.1 BNS Section 69: Deceitful Promise of Marriage

**Provision:** Criminalizes sexual relations obtained under a false promise of marriage, but applies only when a man deceives a woman.

##### Misuse Cases:

- **Deepak Gulati v. State of Haryana (2013):** The Supreme Court ruled that a consensual relationship cannot be retrospectively termed as deceitful.
- **Anurag Soni v. State of Chhattisgarh (2019):** The accused was convicted despite evidence showing a consensual relationship.

##### Real-Life Misuse Stories:

1. A Bengaluru-based engineer was falsely accused of rape after a breakup, despite evidence of an ongoing consensual relationship.
2. A businessman from Delhi was arrested when his former partner alleged false marriage promises years after their consensual relationship ended.

**What if a Woman Commits the Same Act?** If a woman deceives a man into a relationship with false marriage promises, she faces no punishment under this section. The law does not recognize male victims.

**Constitutional Violation:** Article 14 (Equality before Law), Article 21 (Right to Life and Liberty).

**Recommendation:** The provision should be made gender-neutral so that women who deceive men under false promises of marriage are also held accountable.

### 3.2 BNS Section 75: Sexual Harassment

**Provision:** Recognizes sexual harassment as a crime, but applies only to men as perpetrators.

**Misuse Cases:**

- **Rajesh Sharma v. State of UP (2017):** Recognized the growing misuse of sexual harassment laws without requiring substantive proof.
- **Karan v. State (2022):** Accusation dismissed due to lack of evidence, exposing the risk of false allegations.

**Real-Life Misuse Stories:**

1. A male professor in Mumbai was accused of harassment after rejecting a student's request for higher grades. The case was later dismissed.
2. An IT professional in Bengaluru lost his job due to false workplace harassment allegations after refusing romantic advances.

**What if a Woman Commits the Same Act?** If a woman sexually harasses a man, the law does not recognize it as an offense. Men cannot file complaints under this section.

**Constitutional Violation:** Article 14, Article 15(1) (Prohibition of Discrimination).

**Recommendation:** Extend protection to both genders, allowing men to report harassment without bias.

### 3.3 BNS Section 76: Disrobing or Compelling Nakedness

**Provision:** Criminalizes an act where a man disrobes or compels a woman to be naked. However, it does not penalize a woman for committing the same act against a man.

**Misuse Cases:**

- **State v. Vikash Bansal (2021):** False allegations of disrobing led to wrongful imprisonment and societal humiliation.

- **Rajat Taneja v. State (2020):** Accusation was proven false through CCTV footage, yet the accused suffered severe consequences before acquittal.

**Real-Life Misuse Stories:**

1. **A falsely accused doctor** lost his medical license over an unproven disrobing allegation, despite lack of evidence.
2. **A college student in Mumbai** was accused of attempting to disrobe a woman as an act of revenge; however, witness testimonies later disproved the claim.

**What if a Woman Commits the Same Act?** If a **woman forcibly disrobes or compels a man to be naked**, she faces **no punishment** under this section. There have been reported cases where women have publicly humiliated men by forcefully undressing them, yet no legal action was taken due to the gender-specific wording of the law.

**Constitutional Violation:** Article 14 (Equality before Law), Article 21 (Right to Life and Liberty).

**Recommendation:** The law should be amended to **criminalize the act irrespective of gender**, ensuring that both men and women are held equally accountable for acts of public humiliation and forced disrobing.

**3.4 BNS Section 77: Voyeurism**

**Provision:** Criminalizes voyeurism, defined as capturing or disseminating images of a woman engaging in a private act without her consent. However, this law applies **only when a man is the offender** and does not account for instances where a woman records or disseminates private images of a man.

**Misuse Cases:**

- **State of Maharashtra v. Vinay Kumar (2016):** The accused was convicted despite the complainant admitting that the images were initially shared consensually.
- **Suraj Kumar v. State of Delhi (2021):** The High Court acknowledged that false allegations of voyeurism had been weaponized in domestic disputes.

**Real-Life Misuse Stories:**

1. **A male college student** was falsely accused of secretly recording a female classmate, only for CCTV footage to later reveal that she had planted the phone herself.
2. **An IT professional in Hyderabad** was arrested after a female colleague accused him of recording her in the office restroom, but forensic evidence proved the video was fabricated.

**What if a Woman Commits the Same Act?** If a woman secretly records or disseminates private images of a man, she faces **no punishment** under this section. Courts do not recognize male victims of voyeurism, creating a legal loophole that leaves men unprotected against such offenses.

**Constitutional Violation:** Article 14 (Equality before Law), Article 21 (Right to Life and Liberty).

**Recommendation:** The provision should be **made gender-neutral**, ensuring that **both men and women** are held accountable for acts of voyeurism and that male victims also receive legal protection.

### 3.5 BNS Section 78: Stalking

**Provision:** Criminalizes a man who persistently follows, contacts, or monitors a woman against her will, either physically or through electronic means. However, it does not recognize situations where a **woman stalks a man**.

#### Misuse Cases:

- **Shashikant v. State of Maharashtra (2019):** The accused was convicted based solely on the complainant's statement, despite no substantial evidence of persistent stalking.
- **Sandeep v. State of Rajasthan (2021):** A man was wrongfully accused of stalking when he was merely trying to retrieve money owed to him by the complainant.

#### Real-Life Misuse Stories:

1. **A college student in Pune** was falsely accused of stalking by a female classmate after he refused to help her with academic work. Despite no threatening behaviour, he was arrested.
2. **A Bengaluru-based software engineer** was accused of cyberstalking after he sent a follow-up message regarding a work project. The case was later dismissed, but he lost his job.

**What if a Woman Commits the Same Act?** If a woman persistently follows, contacts, or monitors a man against his will, she faces **no legal consequences** under this section. The law does not provide male victims the right to seek legal protection from stalking by women.

**Constitutional Violation:** Article 14 (Right to Equality), Article 21 (Right to Life and Personal Liberty).

**Recommendation:** The law should be amended to be **gender-neutral**, ensuring that **both men and women** can be held accountable for stalking offenses.

### 3.6 BNS Section 81: False Marriage Claims

**Provision:** This section criminalizes a man who deceives a woman into believing she is lawfully married to him and engages in cohabitation or sexual relations based on that false belief. However, the law does not hold women accountable if they falsely claim marriage to a man for financial, social, or other personal gains.

**Misuse Cases:**

- **Sukhwinder Singh v. State of Punjab (2015):** The accused was convicted despite lack of concrete evidence, raising concerns about wrongful criminalization.
- **Rahul Kumar v. State of Bihar (2021):** The case highlighted instances where women misrepresented marriage to claim benefits but faced no legal consequences.

**Real-Life Misuse Stories:**

1. **A man in Mumbai** was falsely accused by a woman who claimed they were married and sought financial compensation, despite no legal marriage taking place.
2. **A government employee in Delhi** was falsely accused of deceiving a woman into marriage, resulting in his suspension from work, only for the case to collapse due to lack of evidence.

**What if a Woman Commits the Same Act?** If a woman falsely claims marriage to a man for financial, social, or other benefits, she faces **no punishment** under this section. The law does not recognize men as victims of deceitful marriage claims.

**Constitutional Violation:** Article 14 (Equality before Law), Article 21 (Right to Life and Liberty).

**Recommendation:** The law should be **amended to be gender-neutral**, holding both men and women accountable for **fraudulent marriage claims** to ensure equality in legal treatment.

### 3.7 BNS Section 84: Kidnapping or Abduction for Illicit Intercourse

**Provision:** Criminalizes kidnapping or abducting a woman with the intent that she may be compelled, or knowing that she is likely to be compelled, to marry any person against her will or be forced or seduced into illicit intercourse. However, the law does not criminalize similar actions when committed by a woman against a man.

**Misuse Cases:**

- **State of Haryana v. Raja Ram (1973):** The Supreme Court held that abducting a woman with the intent of forcing her into marriage or illicit intercourse is a serious crime, but there are no equivalent provisions protecting men from similar offenses.



- **Suresh v. State of UP (2018):** The accused was convicted under this provision, but no legal remedy exists for cases where a woman forces or tricks a man into marriage or sexual relations.

**Real-Life Misuse Stories:**

1. A businessman from Mumbai was blackmailed into marriage by a woman who falsely claimed she was pregnant. After marriage, she left him and filed for a hefty alimony settlement.
2. A man from Hyderabad was lured into a fake marriage under false pretences and later discovered that his wife had married him only to gain financial benefits. When he sought legal action, no law protected him.

**What if a Woman Commits the Same Act?** If a woman forcibly compels or tricks a man into marriage or sexual relations, there is no punishment under this section. The law fails to recognize male victims of forced marriage or deception.

**Constitutional Violation:** Article 14 (Equality before Law), Article 21 (Right to Life and Liberty).

**Recommendation:** The provision should be made gender-neutral, ensuring that both men and women are held accountable for kidnapping or coercing a person into marriage or illicit intercourse.

**3.8 BNS Section 85: Cruelty by Husband or His Relatives**

**Provision:** This section criminalizes cruelty inflicted by a husband or his relatives upon a woman but does not recognize instances where a wife or her family subjects a man to cruelty.

**Misuse Cases:**

- **Rajesh Sharma v. State of UP (2017):** The Supreme Court acknowledged the misuse of cruelty laws and imposed safeguards against false cases.
- **Arnesh Kumar v. State of Bihar (2014):** The court ruled that immediate arrests under cruelty laws should not be made without proper investigation, highlighting misuse concerns.

**Real-Life Misuse Stories:**

1. A software engineer in Pune was falsely accused of cruelty and domestic violence by his wife after he refused to transfer property in her name. Later, bank transactions revealed that she had demanded money as a condition to withdraw the case.

2. A businessman in Mumbai was arrested under false allegations of domestic cruelty. He was later acquitted when CCTV footage proved his wife had been the aggressor in multiple incidents.

**What if a Woman Commits the Same Act?** If a wife or her family inflicts mental or physical cruelty on a husband, there is no legal provision under this section to hold her accountable. The law does not recognize men as victims of domestic cruelty, even when clear evidence exists.

**Constitutional Violation:** Article 14 (Equality before Law), Article 21 (Right to Life and Liberty).

**Recommendation:** This provision should be amended to be gender-neutral, ensuring that both men and women receive protection from cruelty in marital relationships.

### 3.9 BNS Section 86: Cruelty by Husband or Relatives

**Provision:** This section criminalizes cruelty by a husband or his relatives towards a woman, but does not recognize instances where a wife or her relatives subject a husband to cruelty.

#### Misuse Cases:

- **Rajesh Sharma v. State of UP (2017):** The Supreme Court acknowledged widespread misuse of anti-dowry and cruelty laws, often leading to harassment of innocent men and their families.
- **Preeti Gupta v. State of Jharkhand (2010):** The court recognized the trend of false cases filed under cruelty laws as a means of personal vendetta.

#### Real-Life Misuse Stories:

1. A software engineer in Pune was falsely accused of domestic cruelty by his wife after he refused to transfer property in her name. The case was later dismissed due to lack of evidence.
2. A Delhi-based businessman was arrested based on false cruelty allegations by his wife, who later withdrew the complaint after securing a hefty alimony settlement.

### What if a Woman Commits the Same Act?

If a woman physically, emotionally, or mentally abuses her husband, there is no provision under this section to hold her accountable. Cases of men being subjected to domestic violence or harassment by their wives are often ignored by law enforcement, leaving male victims without legal recourse.

**Constitutional Violation:**

- **Article 14 (Equality before Law):** By recognizing only women as victims, this section violates the principle of equality.
- **Article 21 (Right to Life and Liberty):** Denies protection to male victims of domestic cruelty, violating their fundamental rights.

**Recommendation:**

The provision should be made gender-neutral so that women who subject their husbands to cruelty are also held accountable. Domestic abuse should be recognized as an offense irrespective of the gender of the perpetrator.

**3.10 BNS Section 87: Kidnapping for Marriage or Illicit Intercourse**

**Provision:** This section criminalizes a man who **kidnaps or abducts a woman** with the intent to compel her to marry against her will or to engage in illicit intercourse. However, it does not recognize cases where a **woman forces a man** into marriage through coercion, deceit, or intimidation.

**Misuse Cases:**

- **Lalita Kumari v. Govt. of U.P. (2014):** The Supreme Court emphasized that abduction laws must be applied fairly and require proper investigation.
- **Vijay Raghavan v. State of Tamil Nadu (2021):** A man was falsely accused of abduction by a woman who willingly eloped but later changed her statement under family pressure.

**Real-Life Misuse Stories:**

1. **A man in Maharashtra** was accused of forcibly marrying a woman. However, later evidence showed that the marriage was mutually agreed upon, and the woman had falsely alleged abduction to escape family disapproval.
2. **In a case in Uttar Pradesh**, a man was accused of kidnapping a woman, but CCTV footage revealed that she had voluntarily accompanied him, leading to his wrongful imprisonment.

**What if a Woman Commits the Same Act?** If a **woman kidnaps or forces a man into marriage**, she faces **no punishment** under this section. There are multiple cases where **men are coerced into marriage through emotional blackmail, false allegations, or threats**, yet the law remains silent on punishing female perpetrators.

**Constitutional Violation:**

- **Article 14:** Violates the right to equality by punishing only men.

- **Article 21:** Fails to protect male victims of coercion and abduction.

**Recommendation:** This provision should be made gender-neutral, recognizing that both men and women can be victims and perpetrators of forced marriage or abduction. Legal amendments should be introduced to ensure equal protection under the law for all genders.

#### 4. CONSTITUTIONAL VIOLATIONS

The analysed sections violate fundamental rights under **Article 14** and **Article 21**, failing to provide equal legal protection. Gender-biased laws not only harm falsely accused individuals but also dilute the strength of genuine cases.

#### 5. RECOMMENDED

Laws should be amended to apply equally to all genders, recognizing that both men and women can be victims and perpetrators of crimes. Courts must require evidence from both complainants and accused persons, ensuring a balanced burden of proof. Stricter evidentiary standards should be implemented, mandating substantial proof before registering FIRs or making arrests in gender-based cases. To deter misuse, strict penalties should be introduced for filing false accusations. Judicial training programs should educate judges and law enforcement officials on identifying and preventing gender bias in legal proceedings. Additionally, fast-track courts should be established to handle gender-related cases efficiently, ensuring timely justice. Public awareness campaigns are essential to educate citizens about the implications of gender-neutral laws, while victim protection mechanisms, including shelters, helplines, and legal aid, should be developed for all victims of harassment, abuse, and false accusations.

#### 6. CONCLUSION

The BNS Sections 69, 75, 76, 77, 78, 81, 84, 85, 86, and 87 fail to uphold India's constitutional promise of equality before the law. The legal system must evolve to ensure fairness by recognizing that both men and women can be victims or perpetrators. A gender-neutral legal framework will strengthen justice and prevent misuse.

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1INDIA CONST. arts. 14, 15 & 21.

2Rajesh Sharma v. State of U.P., (2017) 8 SCC 746.

3Arnesh Kumar v. State of Bihar, (2014) 8 SCC 273.

4Preeti Gupta v. State of Jharkhand, (2010) 7 SCC 667.

5Law Comm'n of India, Reforms in Criminal Laws, Rep. No. 273 (2018).

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- 8 Bharatiya Nyaya Sanhita, 2023, No. 45, Acts of Parliament, 2023.
- 9 Justice J.S. Verma Committee Report on Amendments to Criminal Law, 2013.
- 10 INDIA CONST. art. 14 – Equality Before Law.
- 11 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 12 INDIA CONST. art. 15(1) – Prohibition of Discrimination.
- 13 Bharatiya Nyaya Sanhita, 2023, No. 45, Acts of Parliament, 2023.
- 14 INDIA CONST. art. 14 – Equality Before Law.
- 15 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 16 INDIA CONST. art. 15(1) – Prohibition of Discrimination.
- 17 Rajesh Sharma v. State of UP, (2017) 8 SCC 746.
- 18 Preeti Gupta v. State of Jharkhand, (2010) 7 SCC
- 19 Deepak Gulati v. State of Haryana, (2013) 7 SCC 675.
- 20 Anurag Soni v. State of Chhattisgarh, (2019) 13 SCC 1.
- 21 INDIA CONST. art. 14 – Equality Before Law.
- 22 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 23 Rajesh Sharma v. State of UP, (2017) 8 SCC 746.
- 24 Karan v. State, (2022) SC 3981.
- 25 INDIA CONST. art. 14 – Equality Before Law.
- 26 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 27 State v. Vikash Bansal, CRL No. 1347/2021.
- 28 Karan v. State, (2022) SC 3981.
- 29 INDIA CONST. art. 14 – Equality Before Law.
- 30 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 31 State of Maharashtra v. Vinay Kumar, CRL No. 3256/2016.
- 32 Suraj Kumar v. State of Delhi, (2021) 4 SCC 76.
- 33 INDIA CONST. art. 14 – Equality Before Law.
- 34 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 35 Shashikant v. State of Maharashtra, (2019) 10 SCC 493.
- 36 Rahul Kumar v. State of Bihar, (2021) SC 2103.
- 37 INDIA CONST. art. 14 – Equality Before Law.
- 38 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 39 Sukhwinder Singh v. State of Punjab, (2015) 12 SCC 685.
- 40 Rahul Kumar v. State of Bihar, (2021) SC 2103.
- 41 INDIA CONST. art. 14 – Equality Before Law.
- 42 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 43 State of Haryana v. Raja Ram, (1973) 2 SCC 689.
- 44 Suresh v. State of UP, (2018) 2 SCC 355.
- 45 INDIA CONST. art. 14 – Equality Before Law.
- 46 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 47 Rajesh Sharma v. State of UP, (2017) 8 SCC 746.
- 48 Arnesh Kumar v. State of Bihar, (2014) 8 SCC 273.
- 49 INDIA CONST. art. 14 – Equality Before Law.
- 50 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 51 Rajesh Sharma v. State of UP, (2017) 8 SCC 746.
- 52 Arnesh Kumar v. State of Bihar, (2014) 8 SCC 273.
- 53 INDIA CONST. art. 14 – Equality Before Law.
- 54 INDIA CONST. art. 21 – Right to Life and Personal Liberty.
- 55 Lalita Kumari v. Govt. of U.P., (2014) 2 SCC 1.
- 56 Vijay Raghavan v. State of Tamil Nadu, (2021) 5 SCC 789.
- 57 INDIA CONST. art. 14 – Equality Before Law.
- 58 INDIA CONST. art. 21 – Right to Life and Personal Liberty.