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WOMEN'S SAFETY IN PUBLIC SPACES IN INDIA: A SOCIO-LEGAL ANALYSIS OF LAW, ENFORCEMENT AND SOCIAL REALITY

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ABSTRACT

Women's safety in public spaces remains an important socio-legal concern in India. Public spaces such as roads, markets, public transport, railway stations, parks, shopping areas and educational institutions are necessary for everyday life, but women may experience harassment, stalking, unwanted sexual conduct, assault and fear in these spaces. Such experiences can affect women's freedom of movement, education, employment, social participation and overall sense of dignity.

The Indian legal framework provides constitutional and statutory protection through Articles 14, 15, 19 and 21 of the Constitution and criminal law provisions dealing with offences against women. The Bharatiya Nyaya Sanhita, 2023 (BNS) contains provisions dealing with assault or criminal force against women, sexual harassment, voyeurism, stalking and acts intended to insult the modesty of a woman.¹ The Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS) also provides procedural safeguards for reporting certain offences against women.² Judicial decisions such as *Vishaka v. State of Rajasthan*, *Rupan Deol Bajaj v. K.P.S. Gill* and *Medha Kotwal Lele v. Union of India* have contributed to the development of principles relating to dignity, equality, sexual harassment and institutional responsibility.

However, the existence of legal provisions does not automatically ensure safety in practice. Reporting difficulties, fear of social stigma, victim blaming, lack of awareness, police response, inadequate infrastructure, transport-related risks and weak institutional coordination can affect the practical enjoyment of legal rights. Government initiatives such as Safe City Projects, Women Help Desks, Emergency Response Support System (112), Women Helpline and One Stop Centres seek to strengthen the institutional response.³

This paper adopts a socio-legal approach to examine the relationship between law and the everyday experiences of women in public spaces. It argues that women's safety requires not only effective laws and punishment but also accessible reporting mechanisms, responsive

policing, safer infrastructure, institutional coordination and changes in social attitudes. The paper therefore examines the gap between formal legal protection and practical safety and suggests measures for making public spaces more accessible and secure for women.

Keywords: Women's Safety, Public Spaces, Gender Equality, Criminal Law, Enforcement, Dignity, Harassment, Socio-Legal Analysis

1. INTRODUCTION

Public spaces are an essential part of everyday life. Roads, streets, markets, public transport, railway stations, parks, shopping areas and educational institutions are used by people for education, employment, travel, social interaction and other activities. For women, however, access to these spaces may be affected by concerns relating to harassment, stalking, unwanted comments, sexual conduct, assault and other forms of violence. The problem is therefore not limited to the occurrence of a particular offence. It also concerns whether women feel free to travel, work, study and participate in public life without fear.

Women's safety is closely connected with constitutional guarantees of equality, non-discrimination, freedom of movement and personal liberty. Articles 14 and 15 protect equality and prohibit discrimination, while Article 19(1)(d) protects the freedom to move freely throughout India. Article 21 protects life and personal liberty and has been interpreted by the Supreme Court to include the right to live with dignity.⁴ These constitutional guarantees provide the broader legal foundation for examining women's safety.

The criminal law framework has also developed significantly. The Bharatiya Nyaya Sanhita, 2023, which came into force on 1 July 2024, contains provisions addressing several forms of conduct affecting women's bodily autonomy, privacy and dignity. Sections 74, 75, 77, 78 and 79 deal respectively with assault or criminal force against a woman with intent to outrage her modesty, sexual harassment, voyeurism, stalking, and words, gestures or acts intended to insult the modesty of a woman.⁵

The legal framework, however, represents only one part of the safety problem. A woman may have a legal right to protection but still avoid reporting an incident because of fear, social pressure, lack of awareness or an expectation that the complaint will not be taken seriously. Similarly, the presence of criminal provisions does not by itself make a poorly lit road, unsafe transport route or isolated public area secure. Government programmes such as Safe City Projects attempt to address these practical aspects through measures including technology, surveillance, improved policing, women police outposts, patrols and Women Help Desks.⁶

Existing scholarship has also examined the relationship between women's mobility, fear and the use of public spaces. Studies on women and urban public spaces have highlighted how concerns about safety can influence where, when and how women use public areas.⁷ The present paper builds on this broader understanding by bringing legal protection, enforcement mechanisms and social reality together.

The central concern of this paper is therefore the gap between **law on paper and safety in practice**. It examines whether constitutional and statutory protections are effectively translated into accessible remedies and safer public environments. The paper also considers the role of courts, police institutions, government schemes, infrastructure and social attitudes.

A socio-legal approach is particularly useful because women's safety cannot be understood only through criminal statutes or reported crime figures. The issue also involves social behaviour, institutional practices, urban planning, transportation, awareness and the willingness of women to use available legal remedies. The paper consequently examines both the formal legal framework and the practical conditions that determine whether women can exercise their rights in public spaces.

2. RESEARCH GAP AND CONTRIBUTION

A considerable body of legal and social discussion exists on crimes against women, sexual harassment, policing, public transportation and women's participation in public life. Separate studies and policy initiatives have addressed criminal law, workplace harassment, urban safety, surveillance, public transport and institutional mechanisms.

However, there is a need for a more integrated analysis of these issues. Legal provisions may create formal rights, but their effectiveness depends upon reporting mechanisms, police response, investigation, prosecution, infrastructure and social attitudes. Looking only at the number of criminal provisions may therefore provide an incomplete picture of women's actual safety.

The research gap addressed by this paper lies in examining **how legal protection interacts with enforcement and social reality**. The paper does not treat women's safety merely as a criminal-law issue. Instead, it examines the combined role of constitutional rights, criminal law, judicial decisions, institutional mechanisms, public infrastructure, reporting behaviour and social attitudes.

The contribution of this paper is therefore to connect three dimensions: **law, enforcement and lived social reality**. This approach helps identify why the existence of legal protection may not always result in women feeling safe or being able to use public spaces freely.

3. RESEARCH PROBLEM, QUESTIONS AND OBJECTIVES

3.1 Research Problem

The central research problem is whether the legal and institutional mechanisms available in India are effectively translated into practical safety for women in public spaces.

Although constitutional rights, criminal provisions, judicial directions and government schemes provide various forms of protection, women may continue to face harassment, stalking, fear and violence. The problem therefore involves understanding the gap between formal protection and its implementation in everyday life.

3.2 Research Questions

The study addresses the following research questions:

1. What constitutional and legal protections are available for women's safety in public spaces in India?
2. How have Indian courts approached issues of women's dignity, equality, harassment and institutional responsibility?
3. What are the major institutional and law-enforcement difficulties affecting women's safety?
4. How do fear, underreporting, lack of awareness and social attitudes affect women's use of public spaces?
5. What measures can reduce the gap between legal protection and practical safety?

3.3 Research Objectives

The objectives of the study are:

1. To examine the constitutional and statutory framework relating to women's safety.
2. To analyse important judicial decisions concerning dignity, equality and harassment.
3. To examine the role of police and other institutions in providing protection and remedies.
4. To identify the gap between formal legal protection and practical safety.
5. To examine social factors such as fear, stigma, victim blaming and lack of awareness.
6. To suggest practical measures for improving women's safety in public spaces.

3.4 Research Proposition

The central proposition of this paper is that formal legal protection alone is insufficient to ensure women's safety in public spaces; effective enforcement, accessible reporting

mechanisms, safer infrastructure, institutional coordination and supportive social attitudes are also necessary.

4. RESEARCH METHODOLOGY

This paper adopts a doctrinal and socio-legal methodology. The doctrinal part examines constitutional provisions, statutory provisions and important judicial decisions relating to women's dignity, equality, harassment and protection.

The socio-legal part examines how legal protections operate in practical situations. It considers official crime data, government schemes, institutional mechanisms, reporting difficulties, infrastructure and social factors affecting women's use of public spaces.

The study is based on secondary sources, including the Constitution of India, legislation, judgments of the Supreme Court, government reports, official crime statistics, government policy documents and relevant academic literature. Official sources have been preferred for legal provisions, government schemes and crime statistics. No primary survey or interview has been conducted for this study.

5. UNDERSTANDING WOMEN'S SAFETY IN PUBLIC SPACES

5.1 Meaning of Public Spaces

Public spaces include places that are commonly accessible or used by members of the public, such as streets, roads, markets, parks, bus stops, railway stations, public transport facilities, shopping areas and other areas where people travel, work or interact.

The safety of these spaces is important because access to public areas is connected with education, employment, economic activity and social participation. When women avoid particular places or restrict their movement because of fear, the effect extends beyond individual incidents and can influence their wider participation in society.

5.2 Meaning of Women's Safety

Women's safety in public spaces should be understood as the ability of women to travel, study, work and participate in public life without violence, harassment, intimidation or unwanted sexual conduct.

Safety has both a physical and psychological dimension. A woman may not experience an actual assault but may still change her route, avoid travelling alone, stop using public transport after dark or avoid certain public areas because she feels unsafe.

Therefore, safety requires more than punishment after an offence. It also requires effective complaint systems, responsive police services, safer public transport, adequate lighting, appropriate surveillance, accessible emergency assistance and public awareness. Such measures should also be implemented with appropriate safeguards for privacy and dignity.

5.3 Forms of Harassment and Violence

Women may face different forms of unwanted conduct in public spaces. These may include unwanted comments or gestures, following or monitoring a woman, sexual harassment, voyeurism, assault and other forms of physical or sexual violence.

The BNS specifically recognises offences such as sexual harassment under Section 75 and stalking under Section 78.⁸ Such provisions are important because harassment can interfere with women's dignity, privacy and freedom of movement even when it does not result in serious physical violence.

At the same time, not every incident is reported to the police. Fear, social stigma, uncertainty about the legal process and the belief that the incident is not serious enough to report can influence reporting behaviour.

5.4 A Socio-Legal Understanding

A socio-legal understanding of women's safety requires examination of both law and social conditions. Criminal law may prohibit particular conduct, but the effectiveness of the law depends on whether women know their rights, can report incidents easily and receive an appropriate institutional response.

The Safe City approach reflects this broader understanding by combining infrastructure, technology and policing measures rather than relying only on criminal punishment.⁹ This indicates that public safety is also connected with urban planning, emergency response, surveillance, policing and institutional accessibility.

6. CONSTITUTIONAL AND LEGAL FRAMEWORK

6.1 Constitutional Protection

The Constitution provides the foundation for legal protection of women's safety.

Article 14 guarantees equality before the law and equal protection of the laws. Women's safety measures must therefore operate within a framework of equality and equal protection.

Article 15 prohibits discrimination on specified grounds, including sex, while Article 15(3) permits the State to make special provisions for women and children.

Article 19(1)(d) protects the freedom to move freely throughout the territory of India.

Restrictions caused by fear of harassment or violence can therefore have implications for women's effective enjoyment of freedom of movement.

Article 21 protects life and personal liberty and has been interpreted as protecting dignity and conditions necessary for a meaningful life.

Together, these provisions establish that women's safety is not merely a law-and-order concern. It is also connected with equality, dignity, liberty and participation in public life.

6.2 Bharatiya Nyaya Sanhita, 2023

The Bharatiya Nyaya Sanhita, 2023 contains several provisions relevant to offences affecting women. Sections 74 to 79 address different forms of conduct affecting women's bodily autonomy, dignity, privacy and security.¹⁰

Table 1: Selected Constitutional and Legal Provisions Relevant to Women's Safety

Provision	Subject	Relevance
Article 14	Equality before law	Equal protection of women under law
Article 15	Prohibition of discrimination	Protection against sex-based discrimination; special provisions permitted
Article 19(1)(d)	Freedom of movement	Protects movement throughout India
Article 21	Life and personal liberty	Includes protection of dignity and personal liberty
BNS Section 74	Assault/criminal force against woman	Criminalises specified conduct intended to outrage modesty
BNS Section 75	Sexual harassment	Addresses specified forms of sexual harassment
BNS Section 77	Voyeurism	Protects women against specified acts involving observation or dissemination of private acts
BNS Section 78	Stalking	Addresses repeated following/contact and specified monitoring
BNS Section 79	Words/gestures/acts	Addresses conduct intended to insult modesty or intrude upon privacy

Source: Constitution of India; Bharatiya Nyaya Sanhita, 2023.

These provisions provide formal criminal-law protection. Their practical effect, however,

depends upon reporting, investigation, prosecution and institutional response.

6.3 Bharatiya Nagarik Suraksha Sanhita, 2023

Procedural safeguards are also important because a legal right is meaningful only when a person can access the criminal justice system.

Section 173 of the BNSS contains safeguards concerning the recording of information relating to specified offences against women. For relevant offences, information given by a woman is to be recorded by a woman police officer or another woman officer. Additional safeguards apply where the woman is temporarily or permanently mentally or physically disabled.¹¹

Such provisions seek to make the reporting process more accessible and sensitive. Their effectiveness depends upon awareness, implementation and the availability of trained personnel.

6.4 Vishaka Guidelines and Workplace Safety

In *Vishaka v. State of Rajasthan*,¹² the Supreme Court recognised sexual harassment at the workplace as a serious violation of women's fundamental rights, including equality, dignity and the right to work. The Court laid down guidelines for preventing and addressing sexual harassment until legislation was enacted.

The decision is primarily concerned with workplace sexual harassment rather than public spaces. However, its importance to the present discussion lies in its recognition that legal protection requires preventive measures and institutional mechanisms rather than punishment alone.

The principles developed in *Vishaka* were later supported by legislation through the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

7. JUDICIAL APPROACH TO WOMEN'S SAFETY AND DIGNITY

7.1 Vishaka v. State of Rajasthan

The *Vishaka* judgment represents an important stage in the judicial development of women's protection against sexual harassment. The Supreme Court treated sexual harassment as affecting constitutional guarantees of equality and dignity and required institutions to establish mechanisms for prevention and redressal.

The significance of the judgment for the present study is that it demonstrates the importance of preventive and institutional responses. A legal framework becomes more meaningful when institutions are required to take responsibility for preventing harassment and responding to

complaints.

7.2 Rupan Deol Bajaj v. K.P.S. Gill

In *Rupan Deol Bajaj v. K.P.S. Gill*,¹³ the Supreme Court considered allegations involving conduct towards a woman that affected her dignity and modesty. The decision is relevant because it demonstrates that conduct against women should not be ignored merely because it does not fall within the most serious forms of physical violence.

The case illustrates the role of criminal law in recognising harm to dignity and personal integrity. It also demonstrates that the legal system can provide remedies for conduct that affects women's dignity even where the facts do not involve the most extreme form of violence.

7.3 Medha Kotwal Lele v. Union of India

In *Medha Kotwal Lele v. Union of India*,¹⁴ the Supreme Court examined the implementation of the *Vishaka* guidelines and emphasised the need for effective institutional mechanisms for dealing with sexual harassment.

The decision is particularly relevant to the present paper because it highlights the difference between having legal principles and actually implementing them. Institutional mechanisms must be functional, accessible and capable of responding to complaints.

7.4 Overall Judicial Approach

The judicial approach reflected in these decisions demonstrates three broad principles.

First, women's safety is connected with **dignity and equality**, rather than being treated only as a question of physical security.

Second, courts have recognised the importance of **preventive and institutional mechanisms**, particularly in cases of harassment.

Third, judicial intervention cannot by itself solve all practical problems. Courts can establish legal principles and direct institutions to act, but safer roads, better transport, adequate lighting, effective policing and changes in social attitudes require continuous administrative and social action.

8. SOCIAL REALITY OF WOMEN'S SAFETY IN PUBLIC SPACES

8.1 Registered Crimes Against Women

Official crime statistics provide an important indication of the extent of reported crime, although they do not capture every incident that occurs.

According to the National Crime Records Bureau, the total number of registered cases of crimes against women was **4,28,278 in 2021, 4,45,256 in 2022 and 4,48,211 in 2023**.¹⁵ The figures show an increase in registered cases during this period.

Table 2: Registered Cases of Crimes Against Women in India, 2021–2023

Year	Registered Cases
2021	4,28,278
2022	4,45,256
2023	4,48,211

Source: National Crime Records Bureau, Crime in India 2023, Ministry of Home Affairs, Government of India.

The increase in registered cases should not automatically be interpreted as an increase of the same magnitude in the actual occurrence of crime. Registration can also be affected by awareness, willingness to report and police recording practices. Further, these figures cover crimes against women across India and are **not limited to incidents occurring in public spaces**. They are therefore used in this paper as broader contextual evidence rather than as a direct measure of public-space crime.

Figure 1: Registered Cases of Crimes Against Women in India, 2021-2023

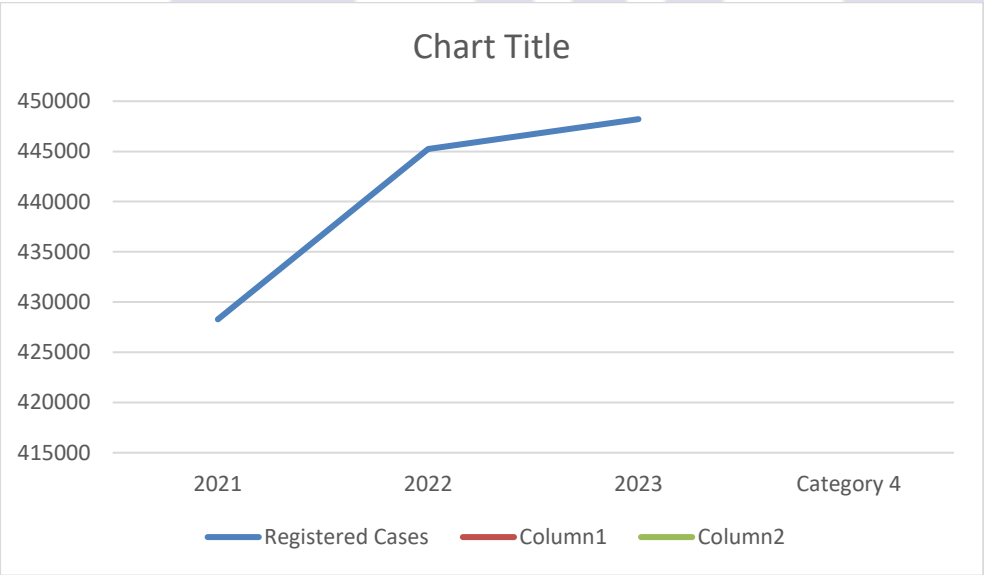


Figure 1: Registered cases of crimes against women in India, 2021–2023.
Source: National Crime Records Bureau, Crime in India 2023.

The data demonstrate the continuing importance of women’s safety as a public policy concern. However, the figures should be read together with other factors such as underreporting, awareness and institutional response.

8.2 Major Categories of Registered Crimes

For 2023, major categories included cruelty by husband or relatives, kidnapping and abduction of women, assault with intent to outrage modesty, rape and other registered offences.

Category	Registered Cases
Cruelty by husband or relatives	1,33,676
Kidnapping and abduction of women	88,605
Assault with intent to outrage modesty	83,891
Rape	29,670
Other registered categories	1,12,369
Total	4,48,211

Source: National Crime Records Bureau, Crime in India 2023.

Figure 2: Major Categories of Registered Crimes Against Women, 2023

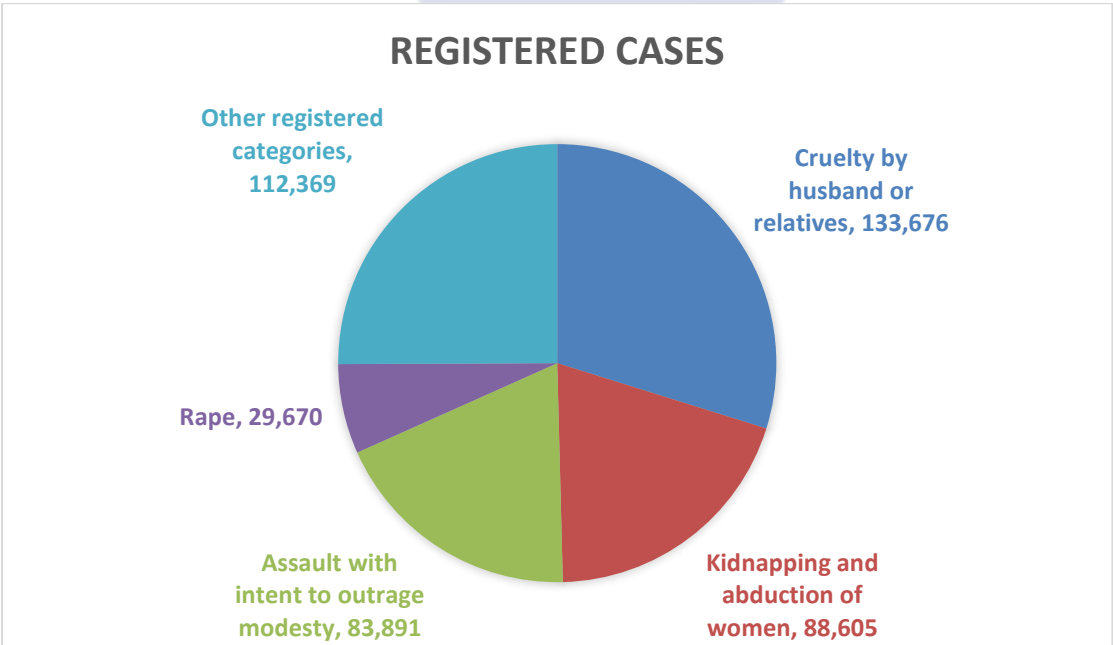


Figure 2: Major categories of registered crimes against women in India, 2023.

Source: National Crime Records Bureau, Crime in India 2023.

These figures again represent registered crimes against women generally and should not be treated as a statistical measure of crimes occurring only in public spaces. Nevertheless, they demonstrate the broader context in which women’s safety must be considered.

8.3 Fear and Restrictions on Mobility

The effect of insecurity cannot be measured only through police complaints. Women may change their behaviour because of perceived risk. They may avoid isolated roads, public

transport at particular times, crowded areas, poorly lit locations or travelling alone. Such restrictions can affect education, employment, social participation and economic opportunities. Therefore, even where no criminal offence is formally reported, fear can influence women’s effective use of public spaces.

8.4 Transport and Public Infrastructure

Infrastructure plays an important role in public safety. Poor lighting, isolated bus stops, inadequate public transport, lack of functioning CCTV systems, poorly maintained public areas and limited emergency assistance can increase perceived and actual risks. Government Safe City Projects seek to improve urban safety through measures including technology, surveillance, policing, patrols, women police facilities and Women Help Desks.¹⁶ Such initiatives show that women’s safety requires preventive infrastructure along with criminal-law enforcement.

8.5 Underreporting and Awareness

One important difficulty is that reported crime does not represent every incident. A woman may decide not to report an incident because of fear of social consequences, victim blaming, family pressure, lack of knowledge or concerns about the legal process. Emergency services and institutional support mechanisms can reduce some of these barriers. The Emergency Response Support System provides the emergency number **112**, while Women Help Desks seek to make police stations more accessible to women.¹⁷ Women may also access support through Women Helpline services and One Stop Centres, which provide different forms of assistance including support, referral and access to relevant services.¹⁸

8.6 Government Measures

Several government initiatives have been introduced to strengthen women’s safety and institutional support.

Table 3: Selected Government Measures Relating to Women’s Safety

Initiative	Main Purpose
Safe City Projects	Infrastructure, technology and policing measures for safer urban spaces
Women Help Desks	Women-friendly assistance at police stations

Women Helpline 181	Assistance, support and referral services
ERSS 112	Emergency response
One Stop Centres	Integrated support including police, medical, legal and counselling assistance
Mission Shakti – Sambal	Measures relating to women's safety and security

Source: Ministry of Home Affairs and Ministry of Women and Child Development, Government of India.

These initiatives demonstrate that women's safety is being approached through multiple institutional mechanisms. Their effectiveness, however, depends upon awareness, accessibility, staffing, coordination and proper implementation.

8.7 Gap Between Legal Protection and Social Reality

The central issue emerging from the above discussion is the gap between legal protection and practical safety.

A woman may have constitutional rights and statutory remedies, but the practical benefit of these rights depends upon whether she can access the police, whether her complaint is properly recorded, whether investigation is effective, whether institutions respond sensitively and whether the surrounding environment is reasonably safe.

The gap is therefore not simply a gap between law and crime. It is a gap between **formal entitlement and actual access to protection**.

9. CHALLENGES IN IMPLEMENTATION

9.1 Reporting Difficulties

Fear, stigma, family pressure and lack of awareness may discourage women from reporting harassment and violence. This can result in a difference between actual incidents and officially registered cases.

9.2 Police Response and Sensitivity

The first institutional response can influence whether a woman feels comfortable continuing with a complaint. Training, gender sensitivity, adequate staffing and accessible Women Help Desks are therefore important.

9.3 Lack of Legal Awareness

Many women may not know which conduct constitutes an offence, where to report it or what procedural protections are available. Legal awareness should therefore extend beyond courts and lawyers and reach schools, colleges, workplaces and communities.

9.4 Stigma and Victim Blaming

Social attitudes can shift attention from the conduct of the offender to the clothing, timing, location or behaviour of the woman. Such attitudes can discourage reporting and reinforce restrictions on women's mobility.

9.5 Infrastructure Deficiencies

Poor lighting, unsafe public transport, isolated locations and inadequate emergency facilities can affect women's sense of security. Safety planning should therefore be incorporated into urban development and transport planning.

9.6 Technology-Related Risks

Technology can support safety through CCTV, emergency systems and digital reporting. At the same time, technology can also create new risks, particularly through stalking and monitoring using electronic communication. The BNS specifically recognises stalking involving certain forms of repeated contact and monitoring.¹⁹

Technology-based safety measures should therefore be accompanied by privacy safeguards, responsible data handling and effective legal remedies.

9.7 Institutional Coordination

Women's safety involves several institutions, including police, local authorities, transport authorities, healthcare institutions, courts and support services. Lack of coordination between these institutions can reduce the effectiveness of otherwise useful schemes.

9.8 Punishment and Prevention

Criminal punishment is important, but it cannot by itself create safe public spaces. Prevention requires awareness, safer infrastructure, responsive institutions and social change. A comprehensive approach should therefore combine punishment with prevention.

10. SUGGESTIONS AND RECOMMENDATIONS

10.1 Increase Legal Awareness

Legal awareness programmes should explain women's rights, relevant offences, emergency services and reporting procedures. Colleges, schools and community institutions can play an important role in spreading this information.

10.2 Make Reporting Easier

Reporting mechanisms should be simple, accessible and responsive. Women should be able to approach trained officers and receive clear information about the next steps in the complaint process.

10.3 Strengthen Police Training

Police personnel should receive regular training on gender sensitivity, handling complaints, legal provisions, digital forms of harassment and the specific needs of women reporting offences.

10.4 Improve Public Infrastructure

Local authorities should identify unsafe locations and improve lighting, roads, public toilets, transport stops, emergency communication systems and other safety-related infrastructure.

10.5 Improve Public Transport Safety

Public transport should provide accessible emergency mechanisms, appropriate surveillance, adequate lighting at stops and responsive complaint systems. Safety should be considered throughout the journey rather than only inside the vehicle.

10.6 Community and Social Awareness

Preventing harassment cannot be the responsibility of women alone. Boys, men, educational institutions and local communities should be involved in awareness programmes concerning consent, dignity, equality and respectful behaviour.

10.7 Strengthen Institutional Coordination

Police, local authorities, healthcare institutions, transport bodies and support services should coordinate their responses. Government schemes should also be periodically evaluated to determine whether women can actually access and use the services provided.

10.8 Combine Prevention with Punishment

Effective criminal enforcement should operate alongside preventive measures. A complete safety framework should therefore address both the offender's conduct and the environmental and social conditions that may increase vulnerability.

10.9 Focus on Accessibility and Actual Use

The success of a women's safety programme should not be measured only by the number of CCTV cameras, help desks or schemes introduced. Evaluation should also consider whether women know about these mechanisms, can access them easily and receive meaningful assistance when they use them.

11. CONCLUSION

Women's safety in public spaces is both a legal and a social issue. The Constitution provides important guarantees of equality, non-discrimination, freedom of movement, personal liberty and dignity. The Bharatiya Nyaya Sanhita, 2023 further provides criminal-law protection against several forms of harassment, stalking, voyeurism, assault and conduct affecting women's dignity. Procedural safeguards under the Bharatiya Nagarik Suraksha Sanhita, 2023 also seek to make access to the criminal justice system more responsive.

Judicial decisions such as *Vishaka*, *Rupan Deol Bajaj* and *Medha Kotwal Lele* demonstrate the importance of dignity, equality, prevention and institutional responsibility. However, judicial recognition and statutory protection cannot by themselves guarantee safe public spaces.

The available crime data show the continuing scale of registered crimes against women, while also demonstrating the importance of understanding the limitations of recorded data. Reported cases do not represent every incident and cannot, by themselves, measure women's everyday experiences of fear and insecurity.

Government initiatives such as Safe City Projects, Women Help Desks, ERSS 112, Women Helpline and One Stop Centres demonstrate an effort to strengthen safety and support mechanisms. Yet the effectiveness of these measures depends upon implementation, awareness, accessibility, staffing, coordination and public trust.

The central finding of this socio-legal analysis is therefore that **women's safety cannot be achieved through law alone**. Legal protection must be supported by effective enforcement, accessible reporting systems, safer transport and infrastructure, institutional coordination and social awareness. Women should not have to restrict their education, employment, travel or participation in public life because of fear.

A meaningful approach to women's safety must consequently move from merely asking whether protective laws exist to asking whether women can actually use those protections when they need them. The connection between law, enforcement, infrastructure and social change is essential for creating public spaces in which women can participate freely, equally and with dignity.

FOOTNOTE

1. The Bharatiya Nyaya Sanhita, 2023, Act No. 45 of 2023, ss 74-79.
2. The Bharatiya Nagarik Suraksha Sanhita, 2023, Act No. 46 of 2023, s 173.
3. Constitution of India, arts 14, 15, 19(1)(d) and 21.
4. Constitution of India, arts 14, 15, 19(1)(d) and 21.
5. The Bharatiya Nyaya Sanhita, 2023, Act No. 45 of 2023, ss 74, 75, 77, 78 and 79.
6. Ministry of Home Affairs, Government of India, "Safe City Projects", Women Safety Division.
7. Shilpa Phadke, Sameera Khan and Shilpa Ranade, "Why Loiter? Women and Risk on Mumbai Streets", *Economic and Political Weekly*, vol. 44, no. 45, 2009, pp. 50-56.
8. The Bharatiya Nyaya Sanhita, 2023, ss 75 and 78.
9. Ministry of Home Affairs, Government of India, "Safe City Projects", Women Safety Division.
10. The Bharatiya Nyaya Sanhita, 2023, Act No. 45 of 2023, ss 74-79.
11. The Bharatiya Nagarik Suraksha Sanhita, 2023, s 173.
12. *Vishaka v. State of Rajasthan*, (1997) 6 SCC 241.
13. *Rupan Deol Bajaj v. K.P.S. Gill*, (1995) 6 SCC 194.
14. *Medha Kotwal Lele v. Union of India*, (2013) 1 SCC 297.
15. National Crime Records Bureau, *Crime in India 2023*, Ministry of Home Affairs, Government of India.
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