WOMEN TRAFFICKING AND PROSTITUTION LAW

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Abstract: Trafficking is prohibited in the Constitution of India. As a fundamental right in Article 23 and 24 trafficking in human beings is prohibited as are all forms of forced labor. Despite this prohibition, India is a source destination and transit country for human trafficking primarily for commercial sexual exploitation and forced labor, and with the falling sex ratio, trafficking for marriage is becoming another pull factor for trafficking of women and girls. Unfortunately, even as a law dealing with sexual exploitation it leaves a lot to be desired.

Introduction.

IndexTerms - prostitution, sex trafficking, Feminist.

INTRODUCTION

Trafficking is prohibited in the Constitution of India. As a fundamental right in Article 23 and 24 trafficking in human beings is prohibited as are all forms of forced labor. Despite this prohibition, India is a source destination and transit country for human trafficking primarily for commercial sexual exploitation and forced labor, and with the falling sex ratio, trafficking for marriage is becoming another pull factor for trafficking of women and girls. At the present time, vulnerable people who are residing in places such as the villages are still not informed or aware enough of how traffickers and exploiters lure and deceive their daughters into the sex industry. The size of the sex industry continues to grow in India due to many various reasons, but one of the many factors that is contributing to this growth is the fact that people are still not aware or educated enough on how daughters and children are being deceived and tricked into the sex industry. This is a major issue which needs governmental attention. As per the official data released by Crime Record Bureau of Central Home Ministry, a sexual harassment is reported in every ten second, a rape incident is reported in every twenty minutes, a minor girl below 16 years of age is raped in every 150 minutes, and a girl child below 10 years is raped in every thirteen hours. In 2016, the then Home Minister of Karnataka, Dr. Parameshwar has stated in the assembly that the state government has set up anti-human trafficking units across nine districts in the state (Bengaluru ciuty, Hubli-Dharwad, Mysore, Belgaum, South Canara, Kalburgi, Raichur, Vijayapura and Davanagere). The minister has said that 88 human trafficking cases in 2014, 113 in 2016, 107 till Oct 2016 have been reported across the state. The police have arrested 324 human traffickers in 2014, 360 in 2015 and 377 in 2016 (Prajavani Nov 30, 2016). There are several contributing factors for trade in human beings particularly in women and children. The factors of trafficking in women and children have push and pull factors. The push factors include; poor socio-economic conditions of a large number of families, poverty coupled with frequent, almost annual natural disasters like floods leading to virtual destitution of some people, lack of education, skill and income opportunities for women in rural areas, absence of awareness about the activities of traffickers, pressure to collect money for dowries which leads to sending daughters to distant places for work, dysfunctional family life, domestic violence against women, low status of girl children, etc. It appears from the case studies that extreme poverty and other causes of deprivation not only push people to fall in the tripod the traffickers, they also create for some an incentive for trafficking. Often the prostitutes, who have no option to come out of the exploitative environment, gradually develop intimate connections with the traffickers and follow in their footsteps. The pull factors are: lucrative employment propositions in big cities, easy money, promise of better pay and a comfortable life by the trafficking touts and agents, demand of young girls for marriage in other regions, demand for low-paid and underage sweat shop labour, growing demand of young kids for adoption, rise in demand for women in the rapidly expanding sex industry, demand for young girls in places of military concentration like Kashmir in India in recent times, demand for young girls for sexual exploitation as a result of the misconception that physical intimacy with young girls reduces men's chances of contacting sexually transmitted diseases, or of the myth that sex with a virgin can cure sexual diseases and impotence. The rampant practice of female feticide has also fuelled internal trafficking. Since there is a shortage of women in these states having a low female to male ratio, they have become fertile ground for the operation of traffickers. Traffickers procure girls from faraway states; trick their families into believing they are to be married, only to later push them into prostitution held in dance bars, pubs, massage parlors etc,. When exploiters and traffickers are choosing this social factor to exploit women, they are clearly violating the basic rights of women. The question in this context is, why is India allowing women of low caste to continue in being sexually exploited? The Indian government has not yet taken serious enough initiatives to prosecute these exploiters so that there can be a decrease, slowly bringing an end to women and children being sexually exploited in the name of their caste, outside and inside of India. If more traffickers and exploiters had been prosecuted for committing the crime of sexually exploiting women and children into the sex industry, then perhaps this social issue would have decreased in its size in India.

International Treaty and Law

Convention for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of others 1949

- The Convention for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others proclaims thus; "The traffic in persons for the purpose of prostitution is incompatible with the dignity and worth of the human person".
- As per Convention on Elimination of all forms of Discrimination Against Women (CEDAW 1979), Section 6, the government should formulate legislations to check women trafficking.
- World Conference on Human Rights in Vienna held in 19993, deeply concerned by various forms of discrimination and violence, to which women continue to be exposed all over the world and passed a resolution that the human rights of women and of the girl-child are an inalienable, integral and indivisible part of universal human rights.

Beijing Declaration 1995

Governments participating in the Fourth World Conference on Women, gathered here in Beijing in 1995, determined to advance the goals of equality, development and peace all women everywhere in the interest of all humanity. The resolutions passed at the conference are;

- The empowerment and advancement of women, including the right to freedom of thought, conscience, religion and belief, thus contributing to the moral, ethical, spiritual and intellectual needs of women and men, individually or in community with others and thereby guaranteeing them the possibility of realizing their full potential in society and shaping their lives in accordance with their own aspirations.
- Adopt specific preventive measures to protect women, youth and children from any abuse sexual abuse, exploitation, trafficking and violence, for example including the formulation and enforcement of laws, and provide legal protection and medical and other assistance.

SAARC Treaty

- The Heads of State or Government recalled that the Ninth SAARC Summit expressed concern at the trafficking of women and children within and between countries and pledged to coordinate efforts of Member States to take effective measures to address this problem.
- In this context, they welcomed the finalization of the draft text on the Regional Convention on Combating the Crime of Trafficking in Women and Children for Prostitution and noted that this would be a vital instrument in dealing with this problem. They approved that the Convention be signed at the Eleventh SAARC Summit.
- The Heads of State or Government also recommended that the feasibility of establishing a Regional Fund for Rehabilitation of Victims of Trafficking in Women and Children for Prostitution on a voluntary basis may be explored.
- The Heads of State or Government were also of the view that the scope of the Convention should be broadened to cover purposes other than prostitution.
- The Heads of State or Government noted that a gender disaggregated data-base on the basis of data provided by Member States would be a valuable means of assisting the formulation of national and regional policies and programmes in respect of women and the girl child.

Immoral Traffic (Prevention) Act 1956

The Immoral Traffic (Prevention) Act, 1986, originally the Suppression of Immoral Traffic in Women and Girls, 1956, is the Central legislation dealing with trafficking in India.16 However, even though the name refers to immoral trafficking of persons, the ITPA's scope is limited to commercial sexual exploitation or prostitution and penalizes those who facilitate and abet commercial sexual exploitation, including clients and those who live off the earnings of prostitutes. It also provides for welfare measures towards rehabilitation of victims in the form of protective homes to be set up and managed by state governments. Unfortunately, even as a law dealing with sexual exploitation it leaves a lot to be desired. Discussed below are some of the gaps.

- Section 2 stipulates that "brothel" includes any house, room, conveyance or place, or any portion of any house, room, conveyance or place, which is used for purposes of sexual exploitation or abuse for the gain of another person or for the mutual gain of two or more prostitutes
- Minor means a person who has not completed the age of sixteen years
- Section 3 states that any person who keeps or manages, or acts or assists in the keeping or management of, a brothel shall be punishable on first conviction with rigorous imprisonment for a term of not less than two years and and also with fine which may extend to two thousand rupees.
- The Section 4 states that any person who shall be punishable on conviction with rigorous imprisonment for a term of not less than three years and not more than seven years and also with fine which may extend to two thousand rupees.
- The section 7 mandates that it is punishable if a brothel is run within 1200 feet of a public place.
- The Section 8 says that any person involved in luring a person through provocative behavior in public place shall attract six months of imprisonment and a fine of five hundred rupees. I this is committed by a woman she shall be imprisoned for six months and men shall be imprisoned for three months.

- As per the section 13, special police officers can be deputed to interrogate the crime of such character.
 - The section 19 states that prostitutes shall have the right to seek shelter in protection house.
 - The section 20 states that the judge shall have powers to relocate the prostitute to other person.

Immoral Trafficking Act 2006 (Amendment)

The Immoral Traffic (Prevention) Amendment Bill, 2006 amends the Immoral Traffic (Prevention) Act, 1956 to combat trafficking and sexual exploitation for commercial purposes.

- The Bill deletes provisions that penalized prostitutes for soliciting clients. It penalizes any person visiting a brothel for the purpose of sexual exploitation of trafficked victims. All offences listed in the Bill would be tried in camera, i.e., the public would be excluded from attending the trial.
- The term "trafficking in persons" has been defined with a provision for punishing any person who is guilty of the offence of trafficking in persons for the purpose of prostitution. The Bill constitutes authorities at the centre and state level to combat trafficking. (Geetha Krishna Murthy, Mahila Hallugalu, pg-109)

IPC Sections on Human Trafficking

- IPC Section 363 (A) penalizes any person Whoever, knowingly by or having reason to believe that a person has been trafficked, engages such person for sexual exploitation in any manner, shall be punished With rigorous imprisonment for a term which shall not be less than three years, but which may extend to five years, and shall also be liable to fine.
- IPC section 365 says whoever kidnaps or abducts any person with intent to cause that person to be secretly and wrongfully confined, shall be punished with imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine.
- IPC Section 366 (A) states whoever induces any girl or forced or seduced to illicit intercourse with another person shall be punishable with imprisonment and shall also be liable to fine.
- IPC section 366 says whoever kidnaps or abducts any woman with intent that she may be compelled, or knowing it to be likely that she will be compelled, to marry any person against her will, shall be punished.
- Whoever imports into India from any country outside India, forced or seduced to illicit intercourse with another person, shall be punishable with imprisonment.
- IPC Section 372 says whoever sells, lets to hire, or otherwise disposes of any one shall be punished with imprisonment.
- IPC Section 373 IPC Section 373 says whoever buys, hires or otherwise obtains possession of any person with intent that such person shall at any age be employed or used for the purpose of prostitution or illicit intercourse with any person shall be punished.
- IPC Section 376 (A) says whoever, commits an offence which causes the death of the woman or causes the woman to be in a persistent vegetative state, shall be punished with rigorous imprisonment.
- IPC section 376 (B) says whoever has sexual intercourse with his own wife, who is living separately, without her consent, shall be punished with imprisonment.
- IPC Section says superintendent, in relation to a jail, remand home or other place of custody or a women's or children's institution, includes a person holding any other office in such jail, remand home, place or institution by virtue of which such person can exercise any authority or control over its inmates.
- IPC Section 376 D says where a woman is raped by one or more persons constituting a group or acting in furtherance of a common intention, each of those persons1 shall be deemed to have committed the offence of rape and shall be punished with rigorous imprisonment.
- IPC Section 377 states whoever voluntarily has carnal intercourse against the order of nature with any man, woman or animal, shall be punished with imprisonment for life.
- IPC Section 493 stipulates that every man who by deceit causes any woman who is not lawfully married to him to believe that she is lawfully married to him and to cohabit or have sexual intercourse with him in that belief, shall be punished with imprisonment.(Halati Somashekhar, Streepara,pg-62).

Role of Judiciary

Judiciary plays a central role in combating human trafficking. Beyond deciding upon the guilt or innocence of alleged perpetrators in sentencing considerations, judges also make key decisions on the interpretation of trafficking laws and the evidence required for establishing the crime. Their decisions also affect victim identification criteria, impact upon assessments of victim credibility and may involve steps to ensure the protection of victims. Following are details of milestone verdicts passed by the judiciary.

Vishal Jain VS Govt. of India (AIR SC 1412)

The Supreme has directed inquiry against forced child prostitution and rehabilitation of the victims held. Child prostitution is not only social but also a socio-economic problem. Eradicating measures should be preventive rather than punitive. However, directions issued by Supreme Court for setting up of Advisory Committees to evolve measures for care, protection and

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rehabilitation of victims. Law Enforcing authorities must take appropriate and speedy action under existing law for eradicating the malady of prostitution.

Gaurav Jain VS Govt. of India (AIR 1997 SC 302)

The child of a prostitute is entitled to receive education, which shall be free and compulsory, at least in the elementary stages. She/he shall be given an education which will promote his/her general culture, and enable him/her on a basis of equal opportunity to develop his/her abilities, his/her individual judgment, and his/her sense of moral and social responsibility and to become a useful member of the society. The best interests of the child shall be the guiding principle of those responsible for his education and guidance, that responsibility lies in the first place with his parents. The child shall have full opportunity for play and recreation, which should be directed to the same purpose as education; society; and the public authorities, shall Endeavour to promote the enjoyment of this right. The SC postulates that the child shall in all circumstances be among the first to receive protection and relief. It is most important in his behalf which provides that the child important in this behalf which provides that the child shall not be the subject of traffic, in any form. The child shall not be admitted to employment before an appropriate minimum age ; he shall in no case be caused or permitted to engage in any occupation or employment which would prejudice his health or health or education, or interfere with his physical, mental development.

Prereana vs Maharashtra State (1999)

The Bombay High Court has directed the State of Maharashtra to follow its verdict a under; to take measures to ensure that the institutions housing rescued women and children are equipped with basic amenities, and are clean, pollution free and well ventilated; to provide the rescued victims with an opportunity to avail of formal education in the institutions, especially literacy programmes; to extend the Vocational Training Scheme presently pending approval of cabinet to Protective Homes.

limitations of ITPA

The existing Act is a revision of the Suppression of Immoral Traffic in Women and Girls Act, 1956 for the Suppression of Traffic in Persons and of the Exploitation of the Prostitution of Others, 1949. The Convention, to which India is a signatory, mandated State parties to punish persons profiting from the prostitution of others without prejudice to how signatories address prostitutes themselves. In enacting the Act, the underlying intent of the legislature, as reflected in legislative debates, was not to proscribe prostitution, but to restrict its practice by penalizing certain acts incidental to sex work. Importantly, parliamentary debates allude to prostitution being immoral, but not illegal. Further, legislators noted that prostitution, or sex between consenting adults in exchange for money, falls within private domain, which the State could not invade. At the same time, the legislature sought to control prostitution in the interest of public order and morality. Though these debates occurred nearly fifty years ago and, are not entirely reflective of current social thought and public perception, these deliberations are a reminder that the legislature did not intend outlawing sex work. Though the Act is silent on the legal status of sex work, it provides ample scope for intrusion in adult, consensual sex work. The maximum arrests and convictions under the Act are against sex workers, who are punished for holding themselves out as such. On the other hand, provisions to counter exploitation in sex work under both the Act and the IPC practically remain unimplemented. Raids, rescues and closure of brothels that are purportedly conducted to protect persons in sex work, are instead, detrimental and aggravate sex workers' vulnerability to violence and sexual infection. The exercise of police powers under the Act remains unquestioned, despite reports of misuse and abuse against sex workers. The Act defines a brothel to mean "any house, room, conveyance or place or any portion of any house, room, conveyance or place which is used for purposes of sexual exploitation or abuse for the gain of another person or for the mutual gain of two or more prostitutes". Brothels are illegal in that owning, subletting, hiring managing and occupying premises deemed as brothels is punishable. Additionally, law enforcement authorities can raid, forcibly remove persons and close down brothels.

In certain jurisdictions, persons repeatedly convicted under Act are placed in the category of 'habitual offenders' and face punitive action under laws to prevent anti-social activities. Sex workers, having faced multiple convictions under Section 8, find themselves enveloped in this inescapable web of criminalization, arrest and incarceration. Sex workers report being ridiculed and interrupted by the police while shopping, dropping their children to schools and interacting with friends on the pretext of soliciting. Anecdotally, it is well known that Section 8 dissuades sex workers' from carrying condoms, which are used by the police to support soliciting charges. Negotiations with clients are hurried and furtive and both parties avoid talk of condoms or safer sex for fear of getting caught. Peer and outreach workers encouraging use of safe sex paraphernalia also report being apprehended on charges of aiding prostitution.

Over the last several decades, the working of the Act has drawn severe criticism from several quarters. The legislation and the machinery provided under it have failed in attaining its intended objective, that is, preventing trafficking and exploitation of persons in sex work. State run homes set up under the Act are unable to rehabilitate rescued persons. At the same time, the law has become a source of repression and harassment for sex workers, who bear the burden of the punitive legal actions, particularly the police, under the Act. Though the Act is silent on the legal status of sex work, it provides ample scope for intrusion in adult, consensual sex work.

case studies

- Savita, aged 18, from Vijayapura, has six members in her family.her mother is a domestic help and her father is bed-1. ridden. Savita has to shoulder the responsibility of supplementing her family income by taing up odd jobs. Her family members had no money to marry her off. Her family was trying everything to meet both the ends. One day, Manjula, a close friend of Savita, brought a marriage proposal for for Savita. Manjula told savita that the groom was from Gujrat and hails from a rich family. Majula used to visit Maharashtra in search of work. Manjula assured Savitha that the groom was a rich boy and he is ready to marry a beautiful girn without dowry. Manjula promised Savita's parents that their daughter would be happy ever after if they gave consent to the marriage. Savita's parents gave their consent and started off to Gujrat to marry off their daughter to a Gujrati boy. Manjula spoke to an agent named Agarwal and took Savita and her parents to the groom's house. When they reached the house of the groom, there was no such festive atmosphere. Only four to five persons from the groom's side were present on the occasion. Savita's parents smelled something fishy and decided not to be part of the ceremony. But the groom and his supporters held them captive and locked them up in a room. Savita was married of forcibly and photographs were also taken. Savita's parents were pushed out of the house. By then Manjula had already fled the scene. Savita's parents returned home and searched for Manula. Savita came back to her house after three months of her marriage. Her condition was pathetic and there were wound marks all over her body. Savita narrated her ordeal and revealed that she was sold to another person after three days of her marriage. Her husband sexually molested her and sold to another pimp. Savita was brutally attacked when she refused to cooperate with her new pimp. She made fiutile attempts to run away from that place. She was finally successful in fleeing that place when she was being taken to another place. She had to beg for food and fiunally reached her home town.
- 2. Twenty four year old Tehseena is from Bangladesh. She speaks Bengali and has a son of eight years. Her husband has deserted her long back. She is not aware of her husband's where abouts. She returned to her pverty stricken maternal home. She has two sisters, a mother and a paralytic father. Her mother is a coolie and the family income is very meager. She worked as domestic help at an affluent family near her village. Daroji, a servant at the same house, promised Tehseena that he would help her find a lucrative job Tehseena di not think much and said that she was ready to go with Daroji. Her parents did not agree to send their daughter away. But tehseena ran away from her maternal house and crossed the Indian border along with Daroji. They spent a night a lodge. a\on that night, Tehseena was given a soft drink in which sedatives were added without her knowledge. She fell unconscious and woke up next day to find herself in brothel in west Bengal. Daroji had sold her to a brothel. From there, she was taken to Bombay where he faced physical violence upon refusing to sex trade. She was later sent to Vijayapura by a pimp. The polic raided the brothel in Vijayapura and sent Tehseena to protective centre.
- 3. Mallavva is 28 year old and has two sisters and a brother. Her mother is a Devadasi. Mallavva was not rady to follow the foot steps of her mother but opted to work as a coolie to support her family. But strange were the ways of the providence. She was forced to become a Devadasi not only from the local people but also from her brother. She resited to become a Devadasi and continued her protest. But she was sold a brothel in Pune by her own brother one day. She now send money to her family every month.

patriarchal resistance to implement women welfare laws

The above case studies drive home the point that poverty, illiteracy and women from subaltern classes are easy prey of prostitution. Women who have been fortunate enough to reside under the desirable social conditions, have been those who have enjoyed the economic and social protection of their husband, father, and brother . Having economic and social protection of a male over the life of a female is what has essentially determined the Indian female's potential life style and fate within society. In some parts of India, culture continues to exemplify the belief that young females should be relegated to a societal status beneath that of men. It was believed in the ancient days that a female is only allowed to acquire status based upon her sexual prowess, body and sexuality. If people within the Indian culture continue to live with this belief in society, then girls and women will not possess the equal social, political and economic opportunities as men for living a fulfilling life because girls and women will not be given the same opportunities as men since they will continue to be seen as sexual objects and second class citizens within society. Not only is this belief of the Indian people dangerous for girls and women, people have and continue to politicize the sexual exploitation of young girls and women in the name of religion. Religion is still being used in some parts of India as a means to exploit.

Historically viewed, prostitution is an age-old profession. It is present in some form in all stratified societies. The profession is generally associated with heterosexual relations, usually centered on women who dole out sexual favors to men in exchange for financial reward. In India, prostitution is also associated with institutionalized practices like the religious prostitutes of Devadasi or the tradition and culture of courtesans and, linked to feudalism and other economic structures as referenced in the ancient texts. In most cases, women are driven to this stigmatized profession due to social inequality and poverty. Women of lower social strata choose the trade not only for their own survival but also to provide assistance to their immediate family members. Their choice to engage in prostitution marginalizes them and they remain outsiders to their community. According to one study, majority of prostitutes in India have been forced into this life by trickery and violence. When individuals are forced into prostitution; this coercion essentially damages the mental, emotional and the physical well-being of people, especially women from disadvantaged social and, or economic backgrounds. It is found that the majority of female prostitutes had been victims of rape, incest and violence which had resulted "in the destruction of a woman's identity, an essential step in subsequently transforming the human body into a sexual item of merchandise for commercial purposes". Within this context, if a woman's body is solely being

degraded as a sexual item of merchandise for commercial purposes, one can only imagine the consequences and the impact of this degradation upon the woman's life and her identity.

problems in procuring evidences

Majority of prostitutes are illiterate and have no legal knowledge. The three case studies mentioned above indirectly refer to the fact that the forced prostitutes have failed to produce documents to bring the criminals to the book. Most of these victims, some as young as 10 to 14 years old, are from segments of society that are highly marginalized by caste and tribal discrimination, as well as socio-economic deprivation. Other victims are trafficked from neighboring countries, including Bangladesh. The rapidly growing number of these victims living in brothels in India reflects rampant violations of domestic laws as well as India's commitments to human rights treaties.

Young girls and women in India are often being tricked or deceived into prostitution by traffickers either by luring them into false employment opportunities in cities, or by making false promises. One of the many examples in ways in which young girls are deceived into prostitution by traffickers is by pretending to love and wanting to marry these girls. An example of this is demonstrated by the unfortunate story of Savita who was cheated by her friend. Her innocence was stolen from her right from the moment she was deceived by the friend who she thought trusted. This experience of being sold into prostitution by a person who is known and trusted is unfortunately very common around the world Like Savita, most women are coerced, manipulated, tricked or forced into prostitution. Just like many other millions of young girls in India, Savita's innocence was further exploited once she was sold to a brothel and could not escape this traumatizing environment by any means. This is not the only type of physical abuse which Savita had suffered with. Savita explains that right from the beginning, she was raped by the owner of the brothel and she was beat up with a leather belt every day by the brothel madam for resisting this new environment. It is also necessary to acknowledge the fact that in India, there exists social and economic imperialism of the man over the woman. The male establishes and maintains his power through the patriarchal devaluation of the female. The man establishes and maintains his power by keeping the female both economically and educationally marginalized. If the men in India continue to apply and live with the patriarchal devaluation of the female, then it is difficult to economically and educationally empower women so that they can socially and economically thrive within society by making their own social and economic choices. In many cases in India, sometimes women are forced to work as prostitutes because they have no other choice. For an example, a woman with the name of Tehseena had to turn to prostitution because her husband left her with children. Oppression and abuse at home can make women feel 'worthless,' and unloved which can also lead them towards prostituting their bodies. Therefore, it is crucial for men in India to value the women in their lives and also to empower them and not to leave them with the only choice of prostituting their bodies for their and their children's survival. It is very unfortunate that victims are often seen to be wary of law enforcement and this plays a role in leading them to become dependent upon their traffickers and other employees. Children are denied the right and access to education in these types of environments, this reinforces the cycle of poverty and illiteracy. Not only do children suffer in regards to their personal development by a lack of education, but communities and countries also suffer with the loss of their human capital. Therefore, it is imperative that further effective action is taken to finally put an end to this inhumane practice. It is not only India's responsibility to bring this inhumane practice to an end. There should be an increasing global commitment to do so. It may be said that the practice of prostitution is a hydra-headed serpent who has many facets and therefore, must be dealt with at various levels and from various angles. It requires a radical change in the society. This would involve a comprehensive review of the whole problem of social customs and mores regarding marriage, divorce, sex education as well as socioeconomic conditions, and also evolving a suitable and comprehensive programmed to raise the economic level and the socio-moral and emotional level of the people. It is important to realize that "economic hardship is a form of psychological stress. And all mental stress of whatever kind is one of the commonest precipitation factors in abnormal conduct" Hence, efforts should be made not only to alleviate every variety of psychological stress, but to provide compensatory children the love, affection, proper knowledge of facts of life' and sense of security and belongingness that is necessary for their normal life, we cannot expect them to lead normal life. This calls for reorganization of the entire problem of child care and child upbringing.

conclusion

Women are dependent on men for all the reasons stated above. Disparity in wages, unpaid labour performed by women as housewives, in family production, and in manual work as helpers and team-mates, absence of any right for women to the collective income of the family, the belief that marital status cancels out the right to receive equal wages and lack of control over their earnings reinforce women's economic dependence and subordinate status. One of the objectives of a planned economy is that women must be made economically independent.