

INVOLVEMENT AND LEADERSHIP ROLES OF WOMEN IN INDIAN GANGS: A STUDY OF GENDER DYNAMICS

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ABSTRACT

The term "woman" is such a strong term that the fact that woman creates everything in the society cannot be denied. A woman is such a creature of God who undoubtedly holds in herself the extreme love, care, responsibilities, strength to deal with everything that comes her way, obligations, positivity, maternity and so on. It will be no prejudice to say that growth of women reflects the growth of any society. If women are marginalized, the effects can be seen on the society. On the other hand, if women are brought up, the society grows. She has significant roles to play in the society. But there is another side of this fact also which shows women committing crimes and violation of laws across the world and India is no exception to this fact. There are many factors which leads a woman to push herself into the world of crimes or build relations with the underworld. According to the survey, out of many factors, the main are the gender discrimination at the community or society level, violence faced at young age in their own homes itself or being victim to incidents like rape, kidnapping, physical and mental torture, domestic violence, sexual harassment etc. Though, with the word "underworld", it is only the male domain that comes to our mind, however, there are certain examples in India, where women have left no stone unturned in establishing their name in the league as dangerous gangsters and leaving famous male gangsters behind. The researcher in this paper aims to provide a study about the same and reasons that often leads "Indian" woman to join the world of crimes and never look back. Not only this, but the positive side of the story has also been discussed. Further, suggestions and approaches are also discussed in the paper that need to be adopted to combat the situation.

Keywords: Gangs, Role of women, Female gangsters, Crimes, Underworld.

1. INTRODUCTION

When we hear of the words like "Gangs" or "Gang Crimes", it is often the men that comes to our mind and imagination running the gangs and the business within. The role of women as gang leader as often been overlooked for years, or they can be visualized as playing the supporting roles to the men leading the gangs. This fact can even

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be witnessed from the tv serials, web series, movies etc. where the role of women is only made shown limited to supporting the men involved in the gangs and committing various form of crimes and nothing further than that.

The reason behind this can be that this is a presumed fact in the society that these types of work or business are meant to be run only by men and are not a cup of tea for the women society. Even if, a woman is shown as a gang leader, it is generally about a woman who decided to go against the rules of society which further lead her to involve herself in these types of works or leading a gang and run business by the way of committing gang crimes. It is the society's own point of view that shaped their vision relating to organized crimes and has limited it to men only. "Girl gangs are neglected, ignored and generally depreciated", said Moore. And for this reason, it is difficult to determine exactly how many gang members are there.

1.1 DIFFERENCE BETWEEN SEX AND GENDER

The term "Sex' is derived from Latin word "Sexus" which means either of the two divisions of organic nature i.e., male and female. It refers to the biological difference between a male and a female and is usually determined at time of birth only. On the other hand, the term "Gender" has been derived from the Latin word "Genus" which means a kind or a race. The norms and expressions related to gender are created by the society and the people living therein. Therefore, what is "masculine" and what is "feminine" can easily vary from society to society and culture to culture. It is a social, psychological and cultural construct which keeps on developing and changing with time.

Article 3 of The Council of Europe Convention defined the term "Gender" as "socially constructed roles, behaviors, activities and attributes that a given society considers appropriate for men and women".⁵ It is the first international human rights document that contains the definition of gender.

Facts like women can menstruate and men cannot, men have bigger bones than men, women have developed breasts that are usually capable of lactating while men have not can be considered to determine the sex whereas the facts like in most of the countries, women are considered more for household work than men, men are considered to be bread earner for the family, gangs are run by men etc. can be considered when we talk about the term "Gender".

1.2 GENDER AND ORGANIZED CRIMES

In any legal system, the increase in crime is clearly an alarming situation for any nation. Amidst all crimes, there are certain type of crimes that are performed repeatedly by criminals not to take revenge, but to gain profits. Such are the crimes that fall under the purview of Organized crimes. Organized crime means the commission of crime at regular intervals in order to make money or profits. It is a kind of illegal business and the crime which is committed is incidental to such activity. The main characteristics of organized crime is its regularity. Contract killing and kidnapping, drug trafficking, smuggling, money laundering, human trafficking etc. are the few examples that fall under the name of Organized crimes.

³ Editorial, "Female Involvement in Gangs" Connections, September 1993.

⁴ Britta N. Torgrimson and Christopher T. Minson, "Sex and Gender: What is the Difference?", 99 J APPL PHYSIOL 786(2005).

⁵"The Council of Europe Convention on preventing and combating violence against women and domestic violence(Istanbul Convention)", Council of Europe *available at* https://www.coe.int/en/web/gender-matters/council-of-europe-convention-on-preventing-and-combating-violence-against-women-and-domestic-violence (Visited on November 2,2023).

Talking about the gender, the role of gender matters in any criminal justice. The life experiences of any human are shaped by the gender of any person and therefore, gender is a part of experiences of men and women who participate in the organized crime. Further, it was a settled fact that the organized crime was a matter exclusively of male domain, however, the said fact seems to have been challenged in the past years and the sector of organized crime has gone under a gender revolution. The involvement of women in organized criminal groups has been portrayed as that of mothers, sisters, wives and lovers of members or leaders of such criminal groups, for years. 6 But, in the current times, the role of women in gangs is seen as them i.e., women in leading roles. Organizers can be seen holding various positions in criminal gangs such as organizers, recruiters, traffickers, etc. The over representation of men in leading role as gangsters has shaped the vision of us towards the gang crimes and is clearly the reason that the common people, today, is less aware of the fact of the equal involvement of men and women in leading the gangs and committing the crimes and further, running the businesses. Studies on the Organized crime shows only men and their experiences as leaders, bosses etc. If we talk about India and its criminal underworld, the very well-known faces such as Dawood Ibrahim, Varadharajan Muralidhar, Arun Gawli, etc. and currently Lawrence Bishnoi, Goldy Brar comes into our mind but not of any women gangster. However, from bottling liquor to pulling off daring heists, there are certain women like Phoolan devi, Reshmi Memon, Shobha Iyer etc. who have marked their presence as leading gangsters in the underworld and have set a perfect example of the fact of equal involvement of women into gang crimes. The involvement of women is only shown as their relationships with men involved in gang crimes and, is therefore, kept limited. The fact that women researchers are granted less or very limited access to research on such topics on the ground that the space of criminal activities is dangerous for them and their safety and integrity may be at risk, is another reason for little awareness among people about gender in gang crimes. The fourth pillar of our democratic country i.e., media, also plays its own role in deciding what a common person thinks about role of gender in the gang crimes or Organized crimes. The concept of gangs has always been considered, seen and studied from the purview of men only, over the years. Considering all the above-mentioned factors, the experiences of women with and within gangs, along with them as leading the gangs have always remain understudied.

2. NATURE OF CRIMES COMMITTED BY WOMEN

The nature of crimes committed by women, traditionally, were not of much grave nature and were limited to petty offences and prostitution etc. but as time passed, nature of crimes committed by women are seen nowhere less equal to that of one committed by men. Therefore, it will be nowhere wrong to say that nowadays, women are equally involved in the types of being committed by gangs which are leaded by men. Some of the offences which are being committed by women are as follows:

- Drug trafficking
- Sex rackets

⁶"Gender and Organized Crime", United Nations Office on Drugs and Crime *available at*: https://www.unodc.org/e4j/en/organized-crime/module-15/key-issues/why-do-we-know-so-little-about-gender-in-organized-crime.html (Visited on November 2,2023).

⁷"Gender and Organized Crime", United Nations Office on Drugs and Crime *available at*: https://www.unodc.org/e4j/en/organized-crime/module-15/key-issues/why-do-we-know-so-little-about-gender-in-organized-crime.html (Visited on November 2,2023).

^{8 &}quot;Female Criminality in India", YL Cube available at: https://ylcube.com/c/blogs/female-criminality-

india/#:~:text=Some%20of%20the%20personal%20factors,like%20drinking%2C%20gambling%2C%20etc.&text=Social%20Factors%2D%20Social%20factors%20are,encourage%20female%20criminality%20in%20India. (Visited on November 2,2023).

- Looting
- Kidnapping
- Murder
- Arms supply
- Rape
- Smuggling
- Robbery
- Blackmailing
- Terrorism
- Pickpocketing

3. REASONS/FACTORS LEADING WOMEN INTO GANGS

The factors that lead a man and a woman into gang crimes cannot be said to be the same to the full extent. As we studied the term "Gender", it constructs different approaches and way of living for both men and women. These standards are set by our own society and in other words, the people living therein. Therefore, it is clear to accept that factors leading a man and a woman into gang crimes or leading gangs will also come out to be different and will not be same to some extent. However, not exclusive, but some factors that lead a woman to get herself involved in gang crimes are discussed here below:

Physical and Sexual abuse

Physical and sexual abuse is one of those factors that have led to the creation of the famous female gangster like the Bandit Queen i.e., Phoolan Devi who was the victim of physical and sexual abuse at his own home by her husband. Owing to such harassment, she ran away from her home. Later On, after joining gang also, she was then abducted and brutally gang raped. There are many other incidents also, combining which, it can be easily concluded that women who were victim of physical and sexual abuse at their homes in one or other way has decided to flew away from their homes and joined criminal world.

Violent family environment

A violent family environment leads the young girls to run away from home and join the gang crimes. Violent family environment includes the parent abuse, sexual abuse and assault which affects the mental state of such girls along with the physical sufferings.¹⁰

⁹ "Eight women gangsters and dacoits who ruled India's underworld and rural hinterland", yahoo!news *available at*: https://sg.news.yahoo.com/eight-women-gangsters-dacoits-ruled-indias-underworld-rural-hinterlands-

^{081951963.}html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAD80LJv94 HnrjXY-oZMpSAnQXVvcYbUTQ3DT_74IhDwvenQWxesU-

<u>zwEnKWOEp0zoPVMsBSjyBdLk70UoOJ4ryxYPfYbrJ6IE848_wVB272Lc_Xbt_ik5cft5uA6SX8R4JoalRzxfChQj37Ov-AZEZurtV1p1C5EeeKIxmmSBmmd</u> (Visited on: November 2,2023).

¹⁰ "Girls, Juvenile Delinquency and Gangs", youth gov *available at*: https://youth.gov/youth-topics/preventing-gang-involvement/girls-juvenile-delinquency-and-gangs (Visited on November 2,2023).

• The Family Connection

Female gang members also come from the families who already have in them someone who is related to the world of gangs and is involved in gang crimes. The decision of females of such families to join the criminal world comes out of various reasons such as, sometimes out of their own interest they decide to join the criminal empire build by their family member, or they decide to support such member involved in gang and crimes, or it can be to take revenge of killing of any such member who is being killed by any rival gang member etc.

• The Attraction of the Drug business

Bela aunty, who is also known by the name of the Illicit liquor queen has developed her entire empire in the 1970s on the basis of this business only. Another example is Shashikala Ramesh Patankar. The main objective of patankar was to get drugs from dealers in Rajasthan and Madhya Pradesh, keep the pure one with herself and mix the impure substance to the rest of the drugs.

Poverty

Poverty is another factor which leads the woman to involve in criminal activities in India. To combat with the poverty conditions, affected women do decide to join criminal activities done by the various gangs, earn money and deal with their families.

• Women's Emancipation

It is a well-known fact that, in India, women were not having same access to the resources as that of men in the past. 11 With passage of time, she started taking place and equal opportunities in every space that a man was working into. The world of criminal activities and the underworld was one of them.

4. ADOLESCENT FEMALES AT RISK

As we have been studying about the involvement of women equal to that of men in leading the gangs and committing gang crimes, the one's at the risk are the youth female gangsters or members involved in this world of crimes. Many of the adolescent females involved in the gangs are identified by the juvenile justice system to be at risk. ¹² Many young women who are identified at risk are also being sexually assaulted by the male gang members. A clear example of adolescent female being at risk is when young females who belong to the poor families and are being sold by their family members to the people running sex rackets away from the eyes of law. Such young females are led to easily become part of the criminal world, who then deny to return to the outside world out of aggression and

¹¹ "Female Criminality in India", YL Cube *available at*: <a href="https://ylcube.com/c/blogs/female-criminality-india/#:~:text=Some%20of%20the%20personal%20factors,like%20drinking%2C%20gambling%2C%20etc.&text=Social%20Factors%2D%20Social%20factors%20are,encourage%20female%20criminality%20in%20India. (Visited on November 2,2023).

¹² Editorial, "Female Involvement in Gangs" Connections, September 1993.

violence mindset. Such incidents destroy the future of adolescent females at very young age. It also gives birth to female as gangsters in the society, who further lead the gangs, commit crimes and build their own business.

5. FEMALE GANSTERS IN INDIA AND CRIMES INVOLVED

If male gangsters have made their great impression in spreading terror and fear among people of India, the female gangsters are no less. Following are the examples of female gangsters who have left their impression in the underworld equally, in comparison to male gangsters:¹³

• Phoolan Devi

Phoolan devi is known among famous gangsters of the world. She is also called as Ganster queen of India and Bandit Queen. Born into a low caste family in the rural areas of Uttar Pradesh, she was married at an earlier age of 11 to a man much older than her. During her rule over the Chambal ravines, she created fear and her impression in the hearts of many. She ran from home after facing extreme physical and sexual abuse, and joined a gang of bandits. She was then abducted and gang raped by a group of Rajput men. Aggrieved by the incident, she then took revenge by lining 22 Rajput men from the village of those rapists, and shooting them. Later on, the incident was known by the name of Behmai massacre giving the name of Devi and the Lady Robinhood to the Phoolan devi. The bandit queen was charged with many offences from looting to massacre, owing to which she spent 11 years in the jail. She was shot dead in 2001, by members of former rival gang.

• Bela Aunty

Bela aunty, also known as the illicit liquor queen, built her empire in 1970s. Talking about the aura of the illicit liquor queen, even toughest gangster like Varadharajan is known to have failed messing with her. Bela aunty developed her way to the criminal world through corrupt police officials, who ensured to look other way while truckloads of illicit liquor entered into black market through Bela aunty.

Santokben Jadeja

Owing to the killing of his gangster husband by a rival gangster, Santokben entered the world of Organized crime. She decided to trace the whereabouts of the 14 people who killed her husband and take the revenge, rather than reaching to the police. Santokben, also popularly known as "Godmother" and mafia queen of Kathiawad, was also most famous Indian woman to lead an underworld enterprise in India. She was also a part of politics as MLA from

^{**}Eight women gangsters and dacoits who ruled India's underworld and rural hinterland", yahoo!news available at: <a href="https://sg.news.yahoo.com/eight-women-gangsters-dacoits-ruled-indias-underworld-rural-hinterlands-081951963.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAD80LJv94
<a href="https://sg.news.yahoo.com/eight-women-gangsters-dacoits-ruled-indias-underworld-rural-hinterlands-081951963.html?guccounter=1&guce_referrer_aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAD80LJv94
<a href="https://sg.news.yahoo.com/eight-women-gangsters-dacoits-ruled-indias-underworld-rural-hinterlands-081951963.html?guccounter=1&guce_referrer_aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAD80LJv94
<a href="https://sg.news.yahoo.com/eight-women-gangsters-dacoits-ruled-indias-underworld-rural-hinterlands-081951963.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAD80LJv94
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<a href="https://sp.news.yahoo.com/eight-women-gangsters-dacoits-ruled-indias-underworld-rural-hinterlands-081951963.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAD80LJv94
<a href="https://sp.news.yahoo.com/eight-women-gangsters-dacoits-ruled-indias-underworld-rural-hinterlands-081951963.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAD80LJv94
<a href="https://sp.news.yahoo.com/eight-women-gangsters-dacoits-ruled-indias-underworld-rural-hinterlands-081951963.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAD80LJv94
<a href="https://sp.news.yahoo.com/eight-women-gangsters-dacoits-ruled-indias-underworld-rural-hinterlands-081951963.html?guccounter=1&guce_referrer_sig=AQAAAD80LJv94
<a href="https://sp.new

1990-1995. Ms. Jadeja died of cardiac arrest in the year 2011. Such was her image that even after six years of death, her name strikes terror in Porbandar-Rajkot reign of Gujarat.

• Haseena Parkar

Haseena Parkar entered the world of crime in 1991, when her husband was killed by men of gangster Arun Gawli. She was called the Godmother of the Nagpada area. The fact that she is the sister of well-known terrorist Dawood Ibrahim, was enough to put her on the dangerous list. Ms. Haseena took over the crime empire of her siblings when they fled the city of Bombay, after the Bombay bomb blast 1993. She then kept entering every shady deal possible and lead her business grow. The incident like land extortion and even negotiating on overseas rights for Hindi films had her name on it.

• Seema Parihar

Seema Parihar was kidnapped by dacoits, at the age of 13. On his way of becoming a dacoit, she leaded her gang in the incidents of looting, kidnapping and spreading terror and fear in the areas of Bihand jungle and the Chambal valley. Parihar was inspired by the Bandit Queen Phoolan Devi and owns the record of killing 70 people, kidnapping 200 and further looting 30 houses. She then, surrendered before UP police in 2001 and got nearly 20 charges framed against her including that of kidnapping and murder. In 2002, Seema joined politics. Out on bail, she has been acquitted of 15 of the criminal cases against her.

There are many other woman criminals apart from the above-mentioned like Shashikala Ramesh Patankar, Jenabai Daruwala, Rubina Siraj Syed etc. who are known for their presence in the world of Organized crime or the underworld of India.

6. WOMEN GANGS EMPOWERING WOMEN

Gulabi gang

The Gulabi gang is an extraordinary women's movement formed in 2006 by Sampat Pal Devi in the Banda District of Uttar Pradesh in Northern India. The region is one of the poorest districts in the country and is marked by a deeply patriarchal culture, rigid caste divisions, female illiteracy, domestic violence, child labor, child marriages and dowry demands. One day when Sampat Pal Devi saw a man mercilessly beating his wife, she pleaded with him to stop but he abuses her as well. Next day, she returned with a bamboo stick and five other women, and thrashed the man badly. The news spread like wildfire and many women started approaching Sampat for similar interventions. Women also came forward to join her team and in the year 2006, Sampat decided that their sisterhood needs a name and uniform now. Thus, pink sari was chosen to represent womanhood and their strength and the gang was given name "Gulabi gang".

Stating one incident, when one day Sampat reached local police station to register a complaint and policeman abused and attacked her, she reverted back on him by giving a lathi blow on his head. In another incident, she dragged a government official out of his car to show a road that was in dire need of repair.

As said by Sampat, "We are not a gang in the usual sense of the term, we are a gang for justice". 14

• Gangubai Kathiawadi

Gangubai is the main character in a part of Zaidi's "Mafia Queens of Mumbai", entitled "The Matriarch of Kamathipura". It is based on the true story of Ganga Hajeevandas Kathiawadi who comes from an educated family of reputed lawyers and educationists, and also holds strong ties with royal kathiawadi family. ¹⁵ Being attracted by movies and acting, she had a dream of becoming an actress. Her boyfriend who promises to get her a role in movies, asks her to marry him. But he betrayed her and sold her to brothel to be a sex worker when she was just 16 years old. Though Gangu was disappointed and depressed on knowing the truth of being betrayed by her husband, but she was also aware of the fact that once a girl enters a prostitution in Kamathipura, she cannot go back to her family. Gangubai, as an educated women knew how to survive. Aware of the fact that she is a sex worker and prostitute, she was well aware of the other fact also that she cannot be oppressed and humiliated. Thus, she decided to get her right as a woman and the rights of the sex workers in the brothel such as wanting all the sex workers at her brothel to have a day off on Sunday and have no visitors, and also, right of sex workers to enjoy their day off by going out to watch movies etc. Gangubai knew that human trafficking is a serious problem and also that women and girls, especially the sex workers need someone who can empower them in order to get the rights and equality between women and men or the sex workers and common women. To start with, she never forced women and girls into prostitution. ¹⁶

Gangu also decided to fight against men's oppression and exploitation, when in an incident, she was badly raped by a men named Pathan who came out to be men of Karim Lala, a leader of Pathan Organization, one of the gangs in Mumbai. Pathan left Gangu with serious wounds and admitted at hospital for weeks. She then decided to meet Karim Lala to get protection for herself and other sex workers from men like Pathan. After negotiating with Lala, she managed to make Karim Lala her brother. Under the guidance of her Rakhi brother, she forges close ties with both the police and the criminal underworld and then, no one dared to take advantage of her and her sex workers. She also raised her voice for the right of children of sex workers to go to schools and get treated equally as she believed in the fact that children of sex workers are also the future of the country.¹⁷

7. NEED FOR A NEW APPROACH TO COMBAT WITH THE SITUATION

When we think of the term "women", it is considered to be a very pure, strong and powerful identity in our society, who plays a significant role in the development of our society. The fact that if one wants to know the situation or development of any society, then one may take a look over the ongoing situation of the women of that nation. Furthermore, it is no wrong to say that a woman is the mirror of the society in any developing country. The women criminality is matter that needs to be considered as unique for our society and hence, there is urgent need to with it as early as possible.

¹⁷ Ibid.

¹⁵ Irwan Sumarsono and Ima Masofa, "Women's Empowerment in the Matriarch of Kamathipura, a part of Hussain Zaidi's Mafia Queens of Mumbai" 12 UNIMUS 171 (2022).

¹⁶ Irwan Sumarsono and Ima Masofa, "Women's Empowerment in the Matriarch of Kamathipura, a part of Hussain Zaidi's Mafia Queens of Mumbai" 12 UNIMUS 171 (2022).

- O To start with, there is a need to keep check on the societal norms that are setting the standards for gender discrimination. The reason behind it is that it is the gender discrimination witnessed by young girls at very little age that led them to against the society rules and opt criminal world and set their future. The gender discrimination at young age leads the aggression and violence within them which then, explodes one day in the form of criminal mindset and lead their life in their own way. There is a need to stop that feeling of revenge, aggression growing in them by not only providing equality to them but "treating" them as equal to male society.
- Furthermore, Community based prevention programs should be set up to prevent the development of such minds at initial stage itself by guiding people of such communities about the gender equality and consequences of keeping the females at their homes in abusive environment. Along with such prevention programs, there is need to set up the rehabilitation institutions at community levels so that, young females or women involved in such gang crimes can be taught of their value of being a woman and the power she holds. They need to be taught that it is possible for them to live a normal life and the society is ready to treat them equally.
- There is a need to develop a separate system and new laws to deal with the women involved in gang crimes and leading gangs. The fact that there are such women who, though involved in such activities want to leave and come out of such world of crimes, should also be considered at priority. Necessary steps and system should be developed to bring out such women safely and support should be delivered to them by the concerned authorities and government in leading a normal life ahead by providing job and carrier opportunities along with the safety from the underworld.
- There is a need for creation of system of "belongings" to reduce the motivation among disappointed females to join the gangs, as gangs are able to recruit and retain membership by giving them assurance of replacing their families and other system of belonging in fractured communities. It may include organization of variety of programs and activities in marginalized areas, such as youth programs, sports activities, crafts, educational projects etc. to ensure the establishment of positive social circles and networks. ¹⁹
- O Drug addiction and sex etc. are the other factors that easily lead young women into joining gangs. Making them aware of the fact that how hazardous the use of drugs and unsafe sexual practices is for them, their future and society as well, can also save the young girls and in fact women also to great extent from getting themselves involved in the world of gangs.

8. CONCLUSION

For our society, the phrase "Gender and Organized crime" is only limited to a certain domain. But with time, a closer study on this topic is the need of the society. The reason is clear that the term "Gender" and the role played by it is

¹⁸ "Female Criminality in India", YL Cube *available at*: <a href="https://ylcube.com/c/blogs/female-criminality-india/#:~:text=Some%20of%20the%20personal%20factors,like%20drinking%2C%20gambling%2C%20etc.&text=Social%20Factors%2D%20Social%20factors%20are,encourage%20female%20criminality%20in%20India. (Visited on November 3,2023).

¹⁹ "Gangs, violence and the role of women and girls", The Global Initiative against Transnational Organized Crime *available at:* https://www.childrenrights.de/documents/upload/TGIATOC_Women_in_Gangs_Policy_Note_1837.pdf (Visited on November 3,2023).

important to study when it comes to the evolvement of criminal justice system. How highly gendered the underworld or world of crimes is, can be easily understood if we clearly examine this one word i.e., Gender. There was a time when women criminality was seen a different matter to deal with in our society, but nowadays, it seems that the scenario has changed. It is considered normal like any other normal thing that is happening in the society. Our society is only seeing it as a result of retaliation, self-preservation etc. but no effective study or efforts are seen made to deal with situation at the ground level.²⁰ Though living in 21st century, but the status given to women by our society is still lesser as compared to that of men. Hence, leading to Gender discrimination like situations at community levels, domestic violence, sexual harassment and many more things. Which further leads a woman to go against the society and choose her own path. More and more study is needed to be done on this topic and serious consideration, necessary steps and laws according to the time, are the need of the hour.



²⁰ "Female Criminality in India", YL Cube *available at:* <a href="https://ylcube.com/c/blogs/female-criminality-india/#:~:text=Some%20of%20the%20personal%20factors,like%20drinking%2C%20gambling%2C%20etc.&text=Social%20Factors%2D%20Social%20factors%20are,encourage%20female%20criminality%20in%20India. (Visited on November 3,2023).