

## **Constitutional Rights and Women in India: A Factual Analysis on Odisha**

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### **ABSTRACT**

*Women emerged as a distinct interest group in the 19th century primarily because the bourgeoisie democratic revolutions of 17<sup>th</sup> and 18th century excluded women from their concept of equality. Since then women as a commune had waged struggle for recognition of their rights as a human being. Women's rights and the politics of development are highly correlated. But the need of the hour is to understand the dilemma that whether development is the cause of expanding women's rights, or conversely, do women's rights facilitates development and how far this is guaranteed and protected by the Indian Constitution? The Constitution posits about formal equality. But the question is whether this formal equality has been translated into substantive equality for women in India. Therefore, drawing on the secondary sources, the objective of this paper is to re-evaluate the politics, prospects, changes and challenges for women's rights in India and specifically in Odisha in context of development and formal equality.*

**KEYWORDS:** *Women, Rights, Development, Formal Equality, Constitution*

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### **I. INTRODUCTION**

Women emerged as a distinct interest group in the 19th century primarily because the bourgeoisie democratic revolutions of 17<sup>th</sup> and 18th century that excluded women from their concept of equality. This distinction was based on gender. Since then women as a commune had waged struggle for recognition of their rights as a human being. In spite of the fact that the women's contribution to the country's development is equal to that of their male counterpart, still they experience a number of limitations that restrain them from comprehending their potential for expansion. It was against this background that the government's all over the world felt the need to prioritize the interests of women and their participation at every stage of the development process. Women as a core group of concern emerged as a major theme in the Millennium Development Goal<sup>1</sup>.

The bulk of the literature focuses on the effects of property (often land) rights for women. In line with economic intuition, a number of empirical studies find that more rights lead to a redistribution of resources towards women and higher investment in both physical and human capital. Some studies find a decrease in fertility when women obtain more economic rights. Further, equality in the division of marital assets tends to decrease female labour force participation. There is also research on the economic consequences of including women in politics through suffrage and gender quotas. When women are involved in politics, both as voters and as policymakers, the composition of government spending shifts towards higher expenditures related to health and children. Finally, improvements in women's control over their own body seem to increase their career prospects and life satisfaction, and may positively affect female bargaining power in the household.

### **II. WOMEN'S RIGHTS AND THE WORLD**

The political-economy literature on the origins of women's rights is relatively small. A recent literature tries to understand the forces behind the expansion in women's rights. The forces can be grouped into two broad categories. On the one hand, general cultural changes may have changed male attitudes towards women's rights. On the other hand, technological change may have altered men's economic incentives for extending rights to women. While culture may have played some independent role, the existing explanations suggest that technological change may have driven both cultural attitudes about women's rights and the expansion of rights itself. An illustration about the wide heterogeneity in women's rights around the world documents the close association between women's empowerment and economic development.

Doepke, Tertilt and Voena (2011) in their study have used the following indicators used to make a cross-country comparison to understand in a better way the position of women's rights and economic development worldwide:

**(a) Female empowerment:** Women in high income countries have almost equal access to land, property, and credit as men, while women in many low income countries are excluded.

**(b) Access to land:** In all countries with a per capita income of \$20,000 or above women have equal access to land.

**(c) Equality in child custody:** Many countries have laws related to women's role in the family. Parental authority is equal for fathers and mothers in essentially all high income countries, while in low income countries parental authority is mostly in the hands of men. Research also shows that sons are strongly favored over daughters in low income countries, somewhat favored in middle-income countries, while there is no distinction between sons and daughters in the countries like United States.

**(d) Contraceptive prevalence:** How much control do women have over their own body? High income countries have strict laws against rape and domestic violence, thereby granting women essentially full control over themselves. This is not the case in all parts of the world. The value for low income countries is about twice as high as for high income countries, showing that the protection from violence is much weaker in poor countries. A specific type of violence against the female body is the practice of female genital mutilation (FGM), which essentially exists only in low income countries.

**(e) Political Rights:** Suffrage was extended much earlier in high income countries: the median year of women suffrage was 1919 in high income countries, compared to 1957 in low income countries. Another measure related to the political process is the percentage of seats in parliament that are held by women. Even if women's share is far from equal to men's share in most countries, high income countries exhibit a higher share (21.3%) compared to the rest of the world.

### III. MAPPING OF WOMEN'S RIGHTS IN INDIA

After having a cross-view of women rights world-wide, it is necessary to have a look at the position of women's rights in India. Women's leadership and effective participation is increasingly on the development agenda of governments and non-governmental organisations, including women's rights groups. Evidence from programmes and research demonstrates the important role women play as key actors and decision-makers in the development process across a wide range of sectors. In the political arena in particular, there is growing momentum among governments to foster and ensure women's participation and leadership in governance structures. Establishing quotas for women's representation at different levels of governance has been a strategic tactic in India (ICRW, 2012). But at the same time the need of the hour is to review a range of areas of human rights abuse of women in India.

**(a) Missing of girl child:** The idiom "missing women" was for the first time used by Prof. Amartya Sen when he showed that in many developing countries the proportion of women as compared to men in the population is suspiciously low. The sex ratio in many states in India is one of the main reasons because of which women, and girls, go 'missing'. The girls from the poor families in India are sold off by the brokers. There are cases of women going missing from their marital homes.

**(b) Dowry deaths:** Dowry disputes are quite a serious problem. In spite of the fact that Section 498A of the Indian Penal Code strongly deals with the person responsible for marital cruelty and has declared taking and giving of dowry as a crime, it is still been widely practiced in India. In fact 'The Dowry Prohibition Act' has not been adequately put into operation in India. It has been discovered that mostly a number of states neither have a Dowry Prohibition Officers nor do they made it obligatory to keep the record of things given and received.

**(c) Domestic Violence:** In spite of the fact that in India we have 'Protection of Women from Domestic Violence Act 2005', domestic violence still remains a serious problem. In fact a major scale of violence that a woman is subjected to in India is linked to the domain of domesticity. The reasons for domestic aggression are primarily ingrained in the patriarchal nature of the Indian society which supports such violence at home.

**(d) Sati:** Even though Sati, an action whereupon the exercise of setting widows on the funeral pyres of their spouse, was barred in the pre-colonial India by social reformer Raja Rammohan Roy, but this practice continued to prevail in post-colonial India. The discourse on sati was invigorated in the post-independence India in 1986 when a young bride from Rajasthan named Roop Kanwar was set on the pyre of her husband. As a consequence in 1987, the 'Sati Prevention Act' was passed which declared the practice of sati a crime for which death penalty can also be given to the perpetrators of such crime. The act also declared that the 'glorification' of sati by erecting a temple and worshipping of the deceased women as a god is also prohibited.

(e) **Child Marriage:** In India although there exist a law barring the marriages of children at primitive age, but it is still being practiced in different parts of India. Child Marriage Act 2006 prohibits child marriage and declares 18 and 21 years as the marriageable age for the girls and boys respectively. According to the National Population Policy (2011), “over 50% of the girls marry below the age of 18, resulting in a typical reproductive pattern of ‘too early, too frequent, too many’, resulting in a high Infant Mortality Rate.” Even today in India a number of children’s are married off on the auspicious day of Teej<sup>2</sup> in Rajasthan.

(f) **Preference for a son:** The preference for a son is a phenomenon which is historically rooted in the patriarchal system of the Indian society. In such a patriarchal society the sons were seen as the major contributor to the family workforce vis-a-vis a girl. The desires for a son often have an adverse effect on the health of the mother and these issues gradually led to the neglect of the female child. Mother’s education is the single most significant factor in reducing son preference. Access to media also significantly reduces son preference. Wealth and economic development do not reduce son preference. Living girls face discrimination but all girls are not equally vulnerable (Pande and Malhotra, 2006).

(g) **Female foeticide:** The low status of women goes on with the practice of infanticide, foeticide, sex-selective abortion which has become common due to the amniocentesis technology, and malnourishment among girl children. In spite of the fact that the Government of India have declared pre-birth sex determination through the use of amniocentesis as unlawful, still illicit termination of female fetuses by untrained nurses and staff is widely prevalent particularly in Northern states of India like Haryana, Rajasthan and Punjab. All these have also resulted in the intensification of maternal mortality rate.

(h) **Education:** Education is one of the most critical areas of empowerment for women. Although the Right to Education under Article 21 of the Indian Constitution have made it compulsory for the government to provide free education to everybody, the high rate of women’s education is still a distant dream. In spite of the fact that Sarva Shiksha Abhiyan to an extent has been successful in bringing the girl child back to the schools, yet their retention rate in the school is lower as compared to their male counterpart. Thus the universalisation of primary education in India remains a remote day-dream for the women.

(i) **Sexual harassment at the workplace:** The initiative on a discourse on sexual harassment of women at their workplace in India started with Supreme Court’s Vishaka guidelines in 1997. However it was the passage of the ‘Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Bill 2013’ that helped in translating these guidelines into concrete rules that are to be implemented. But even today the issue of sexual harassment are largely been swept under the carpet in India.

(j) **Rape:** In India there has been a significant increase in the numbers of rape cases in the last 10 years. In the rural areas of India, particularly in Northern India, the upper caste people use mass rape as a strategy to show power over the members of the lower caste groups. The brutal gang rape case in Delhi had led to the passage of a stricter Law i.e. The Criminal Law (Amendment) Act 2013 to deal with the rape cases in India (Saryal, 2014).

#### **IV. WOMEN’S RIGHTS AND THE STATE OF ODISHA**

The status of women in Odisha during ancient period also resembles the position of women in ancient India, to a great extent. There was the system of worshipping Shakti. The Shakti cult seems to have originated in Odisha in a very early period of history. Thus, it can be legitimately inferred that the predominant position enjoyed by women in the Odisha during ancient period was due to the worship of mother goddess. A wife enjoyed with her husband full religious rights and regularly participated in religious ceremonies. Along with this status some special qualities were expected from women such as single minded devotion to husband, respect towards elders, kind reception of guests and charitable nature were regarded as some of the commendable qualities. The women in ancient Odisha were judged on the basis of these qualities. This in turn opened the way for restrictions upon women in later period.

The status of women of Odisha, during the medieval period, was also not too good. They were more attached to the family. They were not taking any active part in state’s affairs than to meddling in the administrative work. The role of women in the family of medieval Odisha can be known from the writings of Sarala Das. In his sacred treatise, he has depicted women as good housewives. They had the basic duty to maintain household, cooking, maintain homely relation, teach the children and to advise and help their husbands. However, prostitution was practiced by a few women. Although Sati System was recognized in

Odisha, its practice was not rigidly followed. Women education was not given importance. The evils of dowry system owe its origin to this period.

In Pre-Independence India, women participated in the process of the Independence movement. Prominent among them were Malati Choudhury, Rama Devi, Sarala Devi and Annapurna Maharana. They took part in the Salt Agitation of 1930 and the Quit India Movement of 1942. The political socialization of women in Odisha began during the struggle for independence. The freedom struggle provided women with opportunities to participate in activities of politics and social welfare. The result of this participation of women in the political and social life contributed to their own emancipation. Greater opportunity came to women to participate in social and political life, when Odisha became a separate province in 1936. Moreover, the enrolling of women in various newly formed organizations like Utkal Women's Conference, Odisha Women's Education Conference, Nari Mangal Samiti, Nari Rakshya Samiti etc. also generated consciousness among women to struggle against age-old oppression and prejudices. The introduction of female education and the gradual realization of the value of education by some zamindars and native people of Odisha brought a change in the life style of its women. Further, the participation of women in the nationalist movement created a tradition of female involvement in politics. This participation has more or less expanded steadily over the years, through the various elections by way of voting, contesting as candidates, participating in campaigning etc. The gap in turnout between the men and women got more and more narrow.

In Post-Independence India, women in Odisha enjoy the rights and opportunities guaranteed by the Constitution of India. Apart from the Constitutional rights, they were also given certain advantages and privileges by the State Government: for examples, the Odisha Government has constituted a "House Committee on Women Issue and State Commission for Women". Mahila Cooperative Banks have been established in several parts of the state to mobilize deposits and to lend to poor women for their economic growth. In March 1991, Odisha Mahila Vikas Samabaya Nigam was established. The Nigam provided working capital and margin money assistance with interest subsidy to deserving women entrepreneurs and to its affiliated women societies for setting up of small business enterprises.

Any social transformation, in order to change men or women, necessarily involves political participation coupled with political consciousness. The one-third reservation of seats by the Government in Panchayati Raj and Municipal institutions facilitated the entry of more women candidates into local bodies. Moreover, the state government has made provision for reservation of 30% of vacancies in all categories of government posts for providing adequate employment opportunities to women candidates. The Department of Women and Child Development was constituted which looked into the welfare of women and children. Several welfare programmes were being implemented in the state which included setting up of women training centres, provision for short stay homes for women, rehabilitative services for women in distress, provision for old age and widow pension etc (OSCW, 2012).

## **V. PRESENT SCENARIO OF ODISHA**

After having a brief overview about the historical background relating to women of Odisha, it is necessary to have a look on the various issues that are confronted by the women of Odisha in current state of affairs:

(a) **Sex Ratio:** Sex ratio is a fundamental indicator in the understanding of inequality and female aversion. The sex ratio in Odisha declined drastically from 1086 in 1921 to 972 in 2001. However it has improved marginally to 978 as per 2011 Census data. The decline in Child Sex Ratio is the main cause of concern as it continues to decline consistently from 967 in 1991 Census to 950 in 2001 Census to even lower 934 as per the 2011 census. It seems that the PCPNDT (Pre-Conception and Pre-Natal Diagnostic Techniques) Act, 2003 has yielded little result. Easy availability and affordability of sex determination techniques coupled with the absence of proper enforcement of Acts and poor monitoring of clinics and medical labs have been a matter of concern.

(b) **Infant Mortality Rate:** The Infant Mortality Rate for females has remained lower than males throughout the last two decades. Overall the Infant Mortality Rate of Odisha is 65 while that of all India is 50. Female Infant Mortality Rate in the state remains one of the highest in India being 66 females per 1,000 live births.

(c) **Maternal Mortality:** Maternal mortality in India accounts for the largest number in the world. India's Maternal Mortality Rate stands at 254 with Odisha at a much higher 303. The National Family Health Survey (NFHS) reveals that 62.7% of the married women in the age group of 15 to 49 years have anemia which is one of the main causes of maternal mortality besides having low Body Mass Index.

(d) **Marriage:** There has been a larger decline in the age of marriage of age of below 18 years in Odisha compared to the all India level. It is expected to be high at the rural level (39.7%) when compared to the urban level (24.3%). The generally held notion is that education plays an important role in eradicating child marriage.

(e) **Education:** Female literacy in Odisha has been lower than male and has consistently been below as compared to the all India level. As a standalone indicator, it indicates an increase from 4.5% in 1951 to 64.4% in 2011. Women have fared better in literacy because of a number of entitlements provided by the state such as the Sarva Shiksha Abhiyan.

(f) **Women in Politics:** In politics beginning with women joining the freedom movement to 2009 where elections reflected the sorry status of women in politics in Odisha, it has been a struggle. No woman from Odisha is represented in the Lok Sabha. In the Assembly there were only 7 women. Women's inclusion in parties ranged from 8 in BJD to 15 in Congress but their own strength is emerging as 37 women stood as independents in the last national elections of 2014. In 2019 elections, out of 78 women MPs, a total of 7 women MPs belonged to Odisha, making it the first state ever to have 33% or the largest share of women MPs out of its total of 21 seats. Due to exclusion from political decision-making their impact on the state would remain limited, so more women need to be included in the political process. The State has already implemented 50% of seat reservation in Panchayats for women (Hans and Patel, 2012).

## VI. WOMEN'S RIGHTS AND THE INDIAN CONSTITUTION

The constitution of India confers special rights upon women. The constitution makers were well aware of the subordinate and backward position of women in the society. They made some efforts for upliftment of women in the society. The state is directed to provide for maternity relief to female workers under Article 42 of the Constitution, whereas Article 51(A) declares that it is a fundamental duty of every Indian citizen to renounce practices derogatory to the respect and dignity of women. Indian Parliament has passed the Protection of Human Rights Act, 1993 for the proper implementation of Article 51(A). The privileges that are guaranteed to women can be categorized into two groups:

(A) **Constitutional Privileges:** For example: Equality before law for women (Article 14); The State not to discriminate against any citizen on grounds of religion, race, caste, sex, place of birth or any of them (Article 15 (i)); The State to make any special provision in favor of women and children (Article 15 (3)); Equality of opportunity for all citizens in matters relating to employment or appointment to any office under the State (Article 16); The State to direct its policy towards securing for men and women equally the right to an adequate means of livelihood (Article 39(a)); and equal pay for equal work for both men and women (Article 39(d)) etc.

(B) **Legal Provisions:** To uphold the constitutional mandate, the State has enacted various legislative measures intended to ensure equal rights, to counter social discrimination and various forms of violence and atrocities and to provide support services especially to working women. These are broadly classified under two categories:

(i) The Crimes Identified under the Indian Penal Code (IPC): Rape (Sec.376 IPC); Kidnapping and Abduction for different purposes (Sec.363-373); Homicide for Dowry, Dowry Deaths or their attempts (Sec.302/304-B IPC); Molestation (Sec.354 IPC); Sexual Harassment (Sec.509 IPC) etc.

(ii) The Crimes Identified under the Special Laws (SLL): Although all laws are not gender specific, the provisions of law affecting women significantly have been reviewed periodically and amendments carried out to keep pace with the emerging requirements. Some acts which have special provisions to safeguard women and their interests are: The Hindu Marriage Act, 1955; The Hindu Succession Act, 1956 (Amended in 2005); Immoral Traffic (Prevention) Act, 1956; Dowry Prohibition Act, 1961; The Protection of Women from Domestic Violence Act, 2005 etc.

Indian Parliament over the years has taken significant steps through legislations to achieve the goal of empowering the women in India. Apart from the privileges mentioned above, the 73rd and 74th Constitutional (Amendment) Acts provided for 33% reservation for women in both Panchayat and Nagarpalika institutions as well as for the positions of chairpersons of these bodies. These two amendments removed the bottlenecks from the paths of women empowerment at the local level. Apart from this, in India, National Commission for Women had been established in 1990 to look into the women's problem. The Commission have pressurized the government to pass stricter laws to deal with the rape cases, domestic violence and to create a separate criminal code for the women (Saryal, 2014). India has also ratified various international conventions and human rights

instruments committing to secure equal rights of women. Key among them is the ratification of the Convention on Elimination of All Forms of Discrimination against Women (CEDAW) in 1993.

It is widely acknowledged that women's empowerment helps in the achievement of critical development goals. Given this, many of Odisha's women-centric initiatives are potential of being implemented in other states too. In effect, these could play an instrumental role in the political, economic and social empowerment of women in India. The liberation of women is not a simple matter, it is one of the most important concerns of today's scenario not only at the state level but also at the national level. Efforts by the government are on to ensure gender equality<sup>3</sup> but government initiatives alone would not be sufficient to achieve this goal. It requires the attitudinal change of the society as a whole.

## VII. CONCLUSION

The Constitution, therefore, provides equal opportunities for women implicitly as they are applicable to all persons irrespective of sex. However, the courts realize that the various Articles of the Indian constitution reflect only formal equality to women. They have not been able to accelerate substantive equality to the extent the Constitution intended. There is still a considerable gap between constitutional rights and their application in the day-to-day lives of most women. At the same time it is true that women are working in jobs which were hitherto exclusively masculine domains. But there are still instances which exhibit lack of confidence in their capability and efficiency.

Affirmative action<sup>4</sup> to ensure women's political representation is an important step in democratising and engendering local governance. However, it has not been adequate to ensure women's leadership and their effective participation in local governance. Therefore, to conclude we still lack a systematic, empirical and economic analysis of the women's issues and their rights as human. This paper shows that substantial progress has been made in understanding the causes and consequences of the expansion of women's rights. Yet, many open questions remain. Most importantly, more empirical and theoretical research is needed to identify the precise mechanisms underlying the women's rights and to analyze the specific challenges surrounding the expansion of women's rights in developing countries like India and specifically in the state like Odisha.

Governmental initiatives have been sensitive to women's needs but more concrete steps are needed such as gender audit to know whether the efforts are bearing fruit or not. While the norms of globalization becomes binding on elected representatives and governments, it is however imperative that the policies, programmes and schemes are gender sensitive and not gender neutral. Women are moving forward in every field motivated by the urge to excel and to find their own space in this universe. Their efforts in politics at the Panchayat level changed the power equation at the local level. Women's agency has emerged as a powerful indicator of the search for justice and equality. They are using their advantages wherever they can and there are many sectors they have entered as engineers, computer analysts and even venturing to space sciences and industry. We need to build on this advancement of women in Odisha and create a society where we respect women and their human rights.

## ENDNOTES

1. United Nations stated that 'Gender Equality and Women Empowerment' as one of the Millennium Development Goals to be attained by the year 2015.
2. Teej is the Indian festivals that is celebrated in Nepal, Northern and Western India. It is celebrated primarily by girls and women, with songs, dance and prayer rituals. The monsoon festival is primarily dedicated to Goddess Parvati and her union with Lord Shiva.
3. The United Nations supports women issues by setting global standards for achieving gender equality, and works with governments and civil society to design laws, policies, programmes and services needed to implement these standards. Its stands behind women's equal participation in all aspects of life, focusing on five priority areas: increasing women's leadership and participation; ending violence against women; engaging women in all aspects of peace and security processes; enhancing women's economic empowerment; and making gender equality central to national development, planning and budgeting (ICRW, 2012).
4. In India, affirmative action for women and disadvantaged groups has been enshrined into the constitution. The 73rd Constitutional Amendment Act, enacted in 1992, calls for the reservation of a minimum of one-third of seats for women (both as members and as chairpersons) within all of India's locally elected governance bodies commonly referred to as Panchayati Raj Institutions (PRIs). More recently in 2009, the Government of India approved a 50% reservation for women in PRIs; and many states, including Rajasthan and Odisha, have passed similar legislation. The same amendment also calls for PRIs to "prepare and implement plans for economic development and social justice" (ICRW, 2012).

#### REFERENCES

- [1]. Das, I. (2013). "Status of Women: North Eastern Region of India versus India", International Journal of Scientific and Research Publications, Vol.3, No.1, pp.1-8.
- [2]. Devani, Raghuvir K. (2011). "An Analysis-Rights of Women under the Indian Constitution", Indian Bar Review, Vol. XXXVIII, No.1&2, pp.181-188.
- [3]. Doepke, M; Tertilt, M; and Voena, A. (2011). "The Economics and Politics of Women's Rights", National Bureau of Economic Research, Working Paper No. 17672.
- [4]. Gochhayat, A. (2013). "Political Participation of Women in Gram Panchayat Elections in Odisha: A Case Study of Hindol Block in Dhenkanal District", International Journal of Humanities and Social Science Invention, Vol.2, Issue 2, pp.38-46.
- [5]. Hans, Asha; and Patel, A. (2012). Women of Odisha: Status and Challenges, Odisha Review, pp.40-46.
- [6]. International Centre for Research on Women. (2012). "Opportunities and Challenges of Women's Political Participation in India", UN Women, pp. 1-29.
- [7]. Odisha State Commission for Women. (2016). Annual Report 2015-16. Bhubaneswar: Aakaar Solutions.
- [8]. Pande, R; and Malhotra, A. (2006). "Son Preference and Daughter Neglect in India", ICRW, PP.1-6.
- [9]. Saryal, S. (2014). "Women's Rights in India: Problems and Prospects", International Research Journal of Social Sciences, Vol.3, No.7, pp.49-53.

#### Webpages Referred

- [10]. [http://shodhganga.inflibnet.ac.in/bitstream/10603/3804/10/10\\_chapter%204.pdf](http://shodhganga.inflibnet.ac.in/bitstream/10603/3804/10/10_chapter%204.pdf), retrieved on 11<sup>th</sup> February, 2020.
- [11]. <http://www.sacw.net/article723.html>, retrieved on 11<sup>th</sup> February, 2020.
- [12]. <http://www.tehelka.com/2014/11/missing-children-assam-child-trafficking-north-east-india/>, retrieved on 11<sup>th</sup> February, 2020.
- [13]. <http://www.dnaindia.com/analysis/column-rise-of-women-in-northeast-2041124>, retrieved on 12<sup>th</sup> February, 2020.
- [14]. <http://www.indianyouth.net/women-in-northeast-india/>, retrieved on 12<sup>th</sup> February, 2020.
- [15]. <http://www.newindianexpress.com/elections/news/Northeast-has-More-Women-than-Men-Yet-Few-Female-Candidates/2014/04/26/article2190620.ece>, retrieved on 20<sup>th</sup> March, 2020.

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