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Defending Dignity: Safeguarding Women's Rights in the Legal Sphere

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ABSTRACT

Despite legal progress towards gender equality in India, a significant gap remains between the protections offered for women's dignity and their actual implementation. This article delves into this discrepancy, underscoring the pivotal role of constitutional remedies in empowering women and safeguarding their rights.

While Indian law provides special provisions for women, a lack of awareness and complex legal terminology create barriers to their effective utilization. This work aims to bridge this gap by equipping women with knowledge of their constitutional safeguards, particularly those protecting their dignity.

Furthermore, the article examines the broader role of constitutional guarantees in promoting gender equality. It explores how women can leverage these guarantees to challenge discriminatory laws, seek redress for violations, and advocate for systemic change. The article emphasizes the collective responsibility of governments, legal institutions, civil society, and the international community to uphold and enforce these provisions, ultimately fostering a society where women's rights and dignity are fully protected.

By shedding light on this critical issue and providing practical insights, the article contributes to the ongoing efforts to bridge the gap between legal protections and their actualization, ultimately empowering women and advancing gender equality in India.

I. INTRODUCTION TO WOMEN'S RIGHTS IN LEGAL SPHERE

Overcoming women's issues and challenges remains a crucial foundation in the pursuit of gender equality, justice, and human rights despite significant progress in achieving gender balance. Constitutional remedies provide unique opportunities to establish a legal framework that promotes gender equality, protects women's rights, and opposes government and its agencies' injustices. Taking advantage of constitutional guarantees, women can challenge immoral laws, seek justice when their rights are violated, and facilitate structural changes that will support gender equality and justice. Governments, judicial institutions, civil society entities, and the global community must uphold constitutional provisions that strengthen

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women's rights promote gender equality.

The Indian judiciary has played a pivotal role in interpreting and expanding the scope of constitutional rights to protect women's dignity and autonomy. Through landmark judgments, the Supreme Court has recognized women's right to equal opportunity, reproductive choice, and protection from domestic violence, sexual harassment, and marital rape. The judiciary has also struck down discriminatory laws and practices in personal laws, employment, and property rights.

However, the implementation of these judicial pronouncements remains a challenge due to deep-rooted patriarchal mindsets, lack of awareness, and inadequate institutional mechanisms. Women often face barriers in accessing the justice system due to social stigma, economic dependence, and lack of legal literacy. The slow pace of judicial processes and the high costs of litigation further deter women from seeking legal remedies.

To make constitutional remedies more effective, it is essential to strengthen the legal infrastructure, increase the number of women in the judiciary and legal profession, and provide free legal aid and counseling services to women. Gender sensitization of law enforcement agencies, judicial officers, and legal professionals is crucial to ensure a gender-responsive justice system. Civil society organizations can play a vital role in raising awareness about women's rights, providing paralegal assistance, and monitoring the implementation of laws and policies.

Ultimately, the realization of women's constitutional rights requires a multi-pronged approach that combines legal empowerment with social, economic, and political transformation. By harnessing the transformative potential of the Constitution, India can build a more just, equitable, and inclusive society where women's dignity and rights are fully protected and realized.

II. HISTORICAL CONTEXT AND LEGAL FRAMEWORK

The struggle for women's rights within the legal sphere has deep historical roots, marked by centuries of exclusion, marginalization, and subjugation. Throughout history, women have fought for recognition as legal persons, the right to vote, own property, and participate in public life. The evolution of international human rights law, including landmark conventions such as the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), has provided a crucial framework for advancing women's rights at the global level. At the national level, many countries have enacted laws and constitutional provisions to protect women's rights, albeit with varying degrees of effectiveness and enforcement.

III. UNDERSTANDING THE IMPORTANCE OF SAFEGUARDING WOMEN'S RIGHTS

Safeguarding women's rights in India is crucial for progress and development. It empowers women, allowing them to reach their full potential in education, careers, and leadership.³ Laws protecting women from violence and discrimination create a safer environment, fostering a more just society. Furthermore, gender equality, a product of safeguarding women's rights, strengthens the economy and benefits families. By ensuring women's well-being, India invests in a brighter future for all.

A. Empowering Women and Unlocking their Potential

When women's rights are protected, they can access quality education, pursue meaningful careers, and take on leadership roles. This empowerment enables women to contribute their skills, knowledge, and perspectives to the development of the nation. Empowered women become agents of change, driving social, economic, and political progress.

B. Fostering a Safer and More Just Society

Laws and policies that safeguard women's rights, such as those addressing domestic violence, sexual harassment, and gender-based discrimination, create a safer environment for women to live, work, and thrive. This, in turn, fosters a more just and equitable society where women can participate freely and without fear.

C. Strengthening the Economy and Benefiting Families

Gender equality, which is a direct outcome of protecting women's rights, has been shown to have a positive impact on the economy. When women have equal opportunities, they can contribute their skills and talents, leading to increased productivity and economic growth. Furthermore, empowered women are more likely to invest in the health and education of their families, creating a positive ripple effect that benefits the entire community.

D. Investing in a Brighter Future

By safeguarding women's rights, India is investing in the well-being and development of its entire population. When women are empowered and their rights are protected, they can contribute to the nation's progress, leading to a more prosperous, equitable, and inclusive future for all.

³ Together Thrive (2024): In Pursuit of Justice: Safeguarding Women's Human Rights in India!, Medium: <https://medium.com/@maitramayukh0/in-pursuit-of-justice-safeguarding-womens-human-rights-in-india-edf9bd477255>

IV. CHALLENGES

A. Gender-Based Violence: A Persistent Challenge

Gender-based violence remains one of the most pervasive and insidious forms of discrimination against women, encompassing physical, sexual, psychological, and economic abuse. Despite legal prohibitions and international commitments to combat violence against women, millions of women continue to experience violence in their homes, workplaces, communities, and online spaces. The legal response to gender-based violence requires a comprehensive approach, including legislative reforms, access to justice mechanisms, victim support services, and prevention strategies.

B. Intersectionality and Marginalized Women

Intersectionality acknowledges the interconnected nature of social identities and experiences, including gender, race, class, ethnicity, sexuality, disability, and other dimensions of identity. Marginalized women, including indigenous women, women with disabilities, migrant women, and women living in poverty, often face compounded forms of discrimination and marginalization. Defending the dignity of marginalized women within the legal sphere requires a holistic and intersectional approach that recognizes the unique challenges they face and addresses the intersecting factors that contribute to their vulnerability. Legal strategies should be inclusive, responsive, and grounded in the lived experiences of diverse women, ensuring that no woman is left behind in the pursuit of justice and equality.

C. Discrimination and Equality before the Law

Discrimination against women persists in various forms, including unequal access to education, employment, healthcare, and political participation. Legal frameworks prohibiting discrimination based on gender are essential for challenging discriminatory practices and promoting equality before the law. The concept of equality before law states that everyone should be treated equally in the eyes of the law regardless of their status, race, sex, or religion.⁴ However, systemic barriers, implicit biases, and cultural norms often undermine the effectiveness of anti-discrimination laws. Strengthening legal protections against gender discrimination requires proactive measures, including gender mainstreaming in legislation, policies, and judicial decision-making, as well as awareness-raising campaigns and capacity-building initiatives for legal professionals.

D. Access to Justice and Legal Empowerment

⁴ Dr. Kailash Rai: *The Constitutional Law of India* 11th Ed. 2017, Chapter 9, Pg. 128

Access to justice is a fundamental aspect of defending women's rights within the legal sphere. Yet, many women face significant barriers in accessing legal remedies, including economic constraints, geographical barriers, lack of legal literacy, and discrimination within the justice system. Legal empowerment initiatives, including legal aid services, community-based paralegal programs, and alternative dispute resolution mechanisms, are essential for enhancing women's access to justice and strengthening their ability to claim their rights.

V. CONSTITUTIONAL PROVISIONS FOR WOMEN IN INDIA

There are numerous articles under the Constitution of India that enable the state to make special provisions for the advancement of women and ensure their participation in various fields, including education, employment, and public office.

A. Right to Equality

The right to equality is guaranteed by Article 14 of the Indian Constitution which may be claimed by any person whether a citizen or non-citizen of India under Indian Territory. Article 14⁵ guarantees equality before the law and equal protection of the laws to all persons, including women. It prohibits discrimination on grounds of sex, ensuring that women have equal rights and opportunities under the law. India is a diverse country having numerous cultures, religions, castes, and races. Thus, just equality before the law was not sufficient for the nation. Dr. Bhim Rao Ambedkar knew it very well, that is why he added the expression “Equal Protection of Laws” with “Equality before the law” under “Article 14” of the Constitution of India.⁶

B. Right to Non-Discrimination

The Indian Constitution recognizes the special provisions for women and suggests the State make specific laws for their upliftment and security.⁷ Article 15⁸ prohibits discrimination on grounds of sex, among other factors, in matters of access to public places, educational institutions, and employment. It enables the state to make special provisions for the advancement of women and other marginalized groups.

C. Right to Freedom

Article 19 guarantees certain freedoms, including the freedom of speech and expression, the

⁵ The Constitution of India, 1950, Article 14

⁶ Syed Mohd Osama Azam (2023); Reasonable Classification: A Comprehensive Analysis and Its Significance within the Indian Political Landscape: IJCRT: 2320-2882: <http://doi.org/10.1729/Journal.37874>

⁷ Syed Mohd Osama Azam (2023); Balancing Unity and Diversity: A Study of Personal Laws and Uniform Civil Code: Legal Services India E-Journal: <https://legalserviceindia.com/legal/article-13717-balancing-unity-and-diversity-a-study-of-personal-laws-and-the-uniform-civil-code.html>

⁸ The Constitution of India, 1950, Art. 15

freedom to assemble peacefully, and the freedom to form associations or unions. These freedoms are available to women as well, ensuring their right to participate in public discourse and civil society.

D. Right to Life and Personal Liberty

Article 21⁹ protects the right to life and personal liberty, which includes the right to live with dignity. This provision is instrumental in safeguarding women's rights against violence, abuse, and discrimination. In a recent case of **Aishat Shifa Vs. The state of Karnataka & Ors.**,¹⁰ the Apex Court delivers split verdict on the Karnataka hijab ban case. Justice Sudhanshu Dhulia held that the Government Order was unconstitutional. Justice Dhulia reasoned that a student's rights to dignity, privacy, and freedom of expression were inalienable rights, and they could not be restricted on the basis of maintaining discipline and uniformity.¹¹

E. Right to Education

Article 21A¹² guarantees the right to free and compulsory education for all children between the ages of six and fourteen years. This provision benefits girls by ensuring their access to education, promoting gender equality, and empowering them to fulfill their potential. In the past, women faced significant obstacles in accessing education. However, pioneers like Savitribai Phule and Fatima Sheikh joined forces to challenge societal norms and create a new way for female education. Their concerted efforts led to remarkable progress, with Savitribai Phule notably establishing the first school for girls in 1848.

F. Right against Exploitation

Article 23¹³ prohibits trafficking in human beings and forced labor. It protects women from exploitation and ensures that they are not subjected to slavery, forced prostitution, or any other form of involuntary servitude.

G. Equal Rights and Opportunities

Article 39 directs the state to ensure that men and women have equal rights and opportunities and that there is no discrimination on the basis of sex. It mandates the state to promote the welfare of women and secure their participation in all spheres of life.

⁹ Ibid, Art. 21

¹⁰ 2022 (SC) 842

¹¹ Privacy Law Library (2023): <https://privacylibrary.ccgmlud.org/case/aishat-shifa-vs-the-state-of-karnataka-and-others#:~:text=Conversely%2C%20Justice%20Sudhanshu%20Dhulia%20held,of%20maintaining%20discipline%20and%20uniformity.>

¹² The Constitution of India, 1950, Art. 21A

¹³ The Constitution of India, 1950, Article 23

H. Reservation of Seats in Panchayats

Article 243D of The Indian Constitution deals with reservation of seats for women in Panchayats (local self-government institutions) and ensures that not less than one-third of the total number of seats are reserved for women. This reservation is at all tiers of Panchayats - village, intermediate, and district levels.

I. Reservation of Seats in Municipalities

Similar to Article 243D, Article 243T provides for reservation of seats for women in Municipalities (urban local bodies). It mandates that not less than one-third of the total number of seats in Municipalities are reserved for women.

J. Reservation of Seats in Lok Sabha

Article 330 of Indian Constitution allows for reservation of seats for Scheduled Castes and Scheduled Tribes in the Lok Sabha (House of the People). While not specific to women, it indirectly benefits women belonging to these communities.

K. Reservation of Seats in Legislative Assemblies of States

Similar to Article 330, Article 332 provides for reservation of seats for Scheduled Castes and Scheduled Tribes in the Legislative Assemblies of States. Again, while not specific to women, it indirectly benefits women from these communities.

VI. ACTS THAT EMPOWER WOMEN IN INDIA

The National Crime Records Bureau's annual report reveals that 4,45,256 cases of crime against women were registered in 2022 alone, equivalent to nearly 51 FIRs every hour.¹⁴ Crime rate against women has been growing for many years in India. That is why several acts in India are specifically designed to empower women and protect their rights. Here are some key acts:

A. The Protection of Women from Domestic Violence Act, 2005

This act ensures comprehensive protection for women facing domestic violence. Section 3 defines domestic violence, encompassing various forms of abuse. Section 4 mandates the appointment of Protection Officers to assist victims. Under Section 5, police officers, service providers, and magistrates are assigned specific duties to address domestic violence cases

¹⁴ Over 4.45 Lakh cases against women in 2022 (Reported on 06/12/2023): Frontline Magazine: <https://frontline.thehindu.com/news/crime-in-india-2022-ncrb-report-over-445000-crimes-against-women-in-2022-one-every-51-minutes-murders-juvenile-crimes-uapa-offences-against-state-uttar-pradesh-delhi-kolkata-kerala/article67607146.ece#:~:text=The%20National%20Crime%20Records%20Bureau's,escalation%20from%202021%20and%202020.>

effectively. Section 12 allows for the issuance of protection orders to safeguard victims. Moreover, Section 18 grants women the right to reside in a shared household, providing them with essential legal protection and support.

In the case of **SR Batra Vs. Taruna Batra**¹⁵ This case highlighted the importance of the Domestic Violence Act in providing relief to women facing abuse within the confines of their matrimonial homes. The Supreme Court held that the Act is a civil law remedy and can be invoked independently of criminal proceedings under other statutes.

B. The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013

This act plays a crucial role in combating workplace harassment. Section 2 defines sexual harassment, ensuring clarity on what constitutes such misconduct. Section 4 mandates the establishment of Internal Complaints Committees (ICCs) to address complaints within workplaces. Procedures for inquiry into complaints are outlined in Section 9, ensuring a fair and transparent process. Additionally, Section 14 imposes penalties for false complaints, safeguarding against misuse of the law. Section 19 outlines the duties of employers, emphasizing their responsibility to create safe working environments free from harassment.

In the landmark judgment of **Vishaka Vs. State of Rajasthan**,¹⁶ the Supreme Court addressed the sexual harassment of women at work place. The Supreme Court, recognizing the need to fill this legislative gap, laid down guidelines known as the Vishaka Guidelines to prevent and address sexual harassment in the workplace.

C. The Dowry Prohibition Act, 1961

This act aims to eradicate the practice of dowry. Section 2 defines dowry, clarifying its scope within the law. Sections 3 and 4 prescribe penalties for giving, taking, or demanding dowry, deterring individuals from engaging in such practices. Furthermore, Section 8 shifts the burden of proof in certain cases, facilitating the prosecution of offenders and ensuring accountability. In a case of **Bhupendra Vs. State of Madhya Pradesh**¹⁷, the Madhya Pradesh High Court emphasized the importance of the presumption of innocence in dowry harassment cases. The Court held that while the offense of dowry harassment is serious, the accused must be presumed innocent until proven guilty, and convictions should be based on proper evidence.

¹⁵ A.I.R. 2007 SCC 169

¹⁶ A.I.R. 1997 SC 3011

¹⁷ (2003) CRILJ 2957 MP

D. The Maternity Benefit Act, 1961

This act provides essential benefits to working women during pregnancy and childbirth. Section 5 grants women the right to maternity benefits, including paid leave. Section 6 outlines procedures for claiming maternity benefits, ensuring timely and efficient payment. In cases of miscarriage or medical termination of pregnancy, Section 9 ensures that women are still entitled to benefits. Additionally, Section 12 prohibits employers from dismissing or discharging women while they are on maternity leave, protecting their employment rights.

E. The Prohibition of Child Marriage Act, 2006

This act aims to prevent underage marriages. Section 3 declares child marriages voidable at the option of the child involved. Section 4 renders child marriages void ab initio, ensuring their complete annulment. Penalties for contracting or solemnizing child marriages are outlined in Sections 9 and 10, deterring individuals from engaging in such practices and promoting the welfare of children.

Nand Kishore vs. State of Rajasthan¹⁸ in this case, the Rajasthan High Court reiterated the provisions of The Prohibition of Child Marriage Act, 2006, and emphasized the duty of the state to prevent and prohibit child marriages. The court held that child marriages are void ab initio and declared that the marriage of a minor girl, solemnized without her consent, was null and void.

F. The Equal Remuneration Act, 1976

The Equal Remuneration Act, 1976 addresses gender-based pay disparities in the workplace. Section 4 mandates equal remuneration for men and women for the same or similar work. Section 5 prohibits discrimination during recruitment, ensuring equal opportunities for both genders. Additionally, Section 7 establishes an Advisory Committee to promote the principle of equal remuneration, fostering awareness and implementation of gender equality measures in employment practices.

In case of **Air India Statutory Corporation and Others vs. United Labour Union & Others**¹⁹, the Supreme Court of India interpreted the provisions of The Equal Remuneration Act, 1976, specifically focusing on the principle of equal pay for equal work. The court emphasized that the Act prohibits discrimination in wages between male and female employees for the same work or work of a similar nature. The judgment reaffirmed the importance of gender equality in the workplace and underscored the obligation of employers

¹⁸ 2008(2) RLW 1436

¹⁹ AIR 1997 (9) SCC 377

to ensure equal remuneration for men and women performing the same job.

G. Indian Penal Code, 1860

Under the Indian Penal Code 1860, several sections are aimed at safeguarding women's rights and addressing crimes against them. Sections 354, 375, 498A, 509, and 376AB of the Indian Penal Code address various forms of violence against women. Section 354 pertains to acts intending to outrage a woman's modesty, while Section 375 defines rape and Section 376 deals with the punishment for rape. Section 498A addresses cruelty by a husband or his relatives, and Section 509 prohibits acts intended to insult a woman's modesty. Furthermore, Section 376AB imposes punishment for rape committed against girls under twelve years of age.

Relevant case law provides clarity on these provisions. In **State of Punjab v. Major Singh**²⁰, the Supreme Court affirmed that forcibly pulling a woman's clothes constitutes an offense under Section 354. **Mukesh & Anr. v. State for NCT of Delhi & Ors.**,²¹ also known as Delhi Gang Rape case, 2012 is a well-recognized case globally. In this case, the Supreme Court upheld the death penalty awarded to the convicts, affirming the earlier decision of the Delhi High Court. The judgment marked a significant milestone in the legal proceedings surrounding the case and brought a sense of closure to the victim's family and the nation as a whole.

K. Srinivas Rao v. D.A. Deepa²², emphasized the protective intent of Section 498A against dowry harassment. In the following case the Supreme Court of India addressed the issue of mental cruelty as grounds for divorce under the Hindu Marriage Act, 1955. The appellant, K. Srinivas Rao, sought divorce from his wife, D.A. Deepa, citing mental cruelty due to false criminal complaints and allegations of dowry harassment made by Deepa. These allegations led to his arrest and caused significant mental distress. The Supreme Court ruled that filing false complaints and making baseless allegations indeed constitute mental cruelty, which can irreparably damage the marital relationship. Consequently, the Court granted the divorce, setting a precedent for recognizing mental cruelty as valid grounds for divorce.

In the case of **State of Madhya Pradesh v. Laxmi Narayan & Anr.**,²³ the Supreme Court of India upheld the conviction under Section 376AB of the Indian Penal Code for the rape of a girl under twelve years of age. The Court affirmed the lower courts' judgments, emphasizing

²⁰ AIR 1966 SCR 272

²¹ AIR 2017 SC 2161

²² AIR 2013 SCC 226

²³ AIR 2019 SC 1296

the gravity of the crime and the need for stringent punishment to deter such heinous acts. The decision reinforced the legal provisions designed to protect minors and underscored the judiciary's commitment to upholding the rights and safety of children against sexual violence. upheld the conviction under Section 376AB for raping a girl under twelve years of age.

VII. CONCLUSION

Safeguarding the women's rights in the realm of law comprises not only the mandatory requirement but also a set of moral principles firmly based on the concepts of equity, human worth, and rights. With the legal regulation of gender-oriented violence and discrimination, the issue of women's access to the court venues, and recognition of intersectionality factors, it is possible to help the legal society promote gender equality in any other social equation ensuring women's rights. It is our collaborative endeavor to guarantee a legal ground where every woman can execute her right to act with dignity, autonomy, and equality before the law. In this regard, constitutional remediation comprises adequate instruments to empower gender-oriented initiative in the realm of innovations, advocacy, and responsibility. However, their performance is strongly dependent on strong implementation, enforcement, and ongoing efforts by governments, legal institutions, civil society organizations, and the international community. By respecting and enhancing constitutional principles, we may work to create a more just, equal, and inclusive society for all people, regardless of gender.

VIII. SUGGESTIONS

A. Comprehensive Approach to Combating Gender-Based Violence

Legislative reforms, access to justice mechanisms, victim support services, and prevention strategies are needed to address gender-based violence.

B. Inclusive and Intersectional Legal Strategies

Legal strategies should be inclusive, responsive, and grounded in the lived experiences of diverse women, ensuring that no woman is left behind in the pursuit of justice and equality.

C. Strengthening Legal Protections against Discrimination

Proactive measures, including gender mainstreaming in legislation, policies, and judicial decision-making, as well as awareness-raising campaigns and capacity-building initiatives for legal professionals, are required.

D. Enhancing Access to Justice and Legal Empowerment

Legal empowerment initiatives, including legal aid services, community-based paralegal programs, and alternative dispute resolution mechanisms, are essential for enhancing women's access to justice and strengthening their ability to claim their rights.

E. Strengthen Implementation of Existing Laws

Ensure effective implementation and enforcement of existing laws protecting women's rights, such as the Domestic Violence Act, Sexual Harassment at Workplace Act, and Dowry Prohibition Act. Establish robust monitoring and accountability mechanisms to track the implementation of laws and policies for women.

F. Increase Representation of Women in Decision-Making

Enhance women's representation in local governance bodies, political institutions, and other decision-making forums through measures like reservations. Promote women's leadership and participation in traditionally male-dominated spheres like the judiciary, police, and armed forces.

G. Provide Comprehensive Support Services for Victims

Establish one-stop crisis centers that provide medical, legal, psychosocial, and rehabilitation support to women facing violence. Ensure adequate funding and capacity-building of protection officers, shelter homes, and counseling centers under the Domestic Violence Act.

H. Challenge Patriarchal Mindsets and Social Norms

Conduct awareness campaigns and educational reforms to challenge deep-rooted patriarchal mindsets and social norms that perpetuate gender inequality. Engage with religious, social, and political leaders to promote positive masculinity and gender-equitable attitudes.

I. Empower Women Economically and Socially

Provide skill development, entrepreneurship support, and access to credit and markets to enable women's economic empowerment. Ensure universal access to quality education, healthcare, and nutrition for girls and women.

J. Promote Gender-Responsive Budgeting and Planning

Integrate a gender perspective into the formulation, implementation, monitoring, and evaluation of policies, programs, and budgets. Allocate adequate financial and human resources for women's empowerment and gender equality initiatives.
