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## 4. Law Enforcement's Role in Addressing Gender-Based Violence in India

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#### Abstract:

This chapter explores the essential role of law enforcement in tackling gender-based violence (GBV) in India, focusing on the challenges, legal frameworks, and practices that influence police responses to such crimes. GBV, which includes domestic violence, sexual assault, and honor-based crimes, persists as a major societal issue, deeply rooted in entrenched social norms and gender inequalities. The chapter examines how Indian law enforcement navigates a complex legal structure, featuring provisions from the Indian Penal Code (IPC), the Protection of Women from Domestic Violence Act, 2005, and the Criminal Law (Amendment) Act, 2013, among others. Despite these laws, police face significant obstacles such as underreporting, resource limitations, and a need for specialized training to approach GBV cases with sensitivity.

The chapter also reviews landmark cases like Vishaka v. State of Rajasthan and the Nirbhaya case, which have spurred reforms and underscored the importance of a victim-focused approach in law enforcement. By analyzing initiatives such as specialized GBV units, community policing, and all-women police stations, it highlights effective strategies and best practices. Recommendations for improvement include enhanced training in trauma-informed practices, strengthened accountability, and deeper community engagement. Ultimately, the chapter emphasizes that while India has made progress in addressing GBV, a more integrated and compassionate law enforcement approach is critical to safeguarding victims and advancing a more just and secure society.

## **Keywords:**

gender, law, violence, women, India.

#### 4.1 Introduction:

Gender-based violence (GBV) remains one of the most pervasive and deeply entrenched social issues in India, impacting individuals across various segments of society. It includes a wide spectrum of abuses, such as domestic violence, sexual harassment, rape, trafficking, dowry-related violence, and honor killings. The persistence of GBV is not only rooted in societal attitudes and cultural norms but also exacerbated by systemic challenges within the criminal justice system, particularly in law enforcement. While legal frameworks have advanced to address these issues, the role of law enforcement agencies in preventing, investigating, and prosecuting such crimes is critical to the effectiveness of these laws.

In India, the response to GBV is multifaceted and complex, as law enforcement officers operate within a complex legal framework that includes the Indian Penal Code (IPC), the Protection of Women from Domestic Violence Act, 2005, the Criminal Law (Amendment) Act, 2013, and other relevant statutes. These laws provide substantial protection for women and GBV victims, but challenges such as underreporting, limited resources, lack of victim-centered training, and societal biases often hinder the swift and effective implementation of these laws.

The need for a compassionate, informed, and proactive approach by law enforcement is critical. This chapter explores the role of law enforcement in tackling GBV in India, examining the legal and procedural frameworks that guide police actions, the challenges they encounter, and the strategies that have been successful. Landmark cases such as *Vishaka v. State of Rajasthan* and the *Nirbhaya case* have shaped the discourse on GBV and the police response. The chapter also highlights best practices and offers recommendations to enhance police effectiveness and ensure justice for victims, advocating for a more coordinated, empathetic approach to combating GBV in India.

## 4.2 Understanding Gender-Based Violence in India:

Gender-based violence (GBV) in India encompasses a wide range of harmful acts, including physical, sexual, psychological, and economic abuse. It manifests through crimes such as domestic violence, sexual assault, dowry-related harassment, trafficking, and honor killings, all of which are widespread across the country. These forms of violence are deeply entrenched in patriarchal societal structures and cultural traditions, which perpetuate gender inequality and normalize the abuse of women. The cultural attitudes that view women as subordinate to men often contribute to the prevalence of such violence, making it a significant social issue that affects women and girls from all walks of life, regardless of their socioeconomic status, education, or location.

In this context, the role of law enforcement becomes indispensable in addressing and combating GBV. Law enforcement agencies are tasked with enforcing laws designed to protect victims, ensuring that offenders are held accountable, and fostering a legal environment in which justice can be served. The police, in particular, play a central role in the immediate response to reports of GBV, whether through arresting perpetrators, conducting investigations, or providing initial support to survivors. Their actions, however, must go beyond mere enforcement to include sensitivity to the trauma experienced by victims, proper handling of evidence, and adherence to legal procedures that prioritize the safety and dignity of the victims.

## 4.2.1 Legal Framework Addressing Gender-Based Violence in India:

India has enacted a series of laws specifically designed to address various forms of gender-based violence (GBV), creating a robust legal framework that enables law enforcement agencies to investigate, prosecute, and provide justice for victims of such crimes. These laws are essential tools in the ongoing effort to combat GBV, providing both preventive measures and remedies for those affected.

One of the most important pieces of legislation in this regard is the **Protection of Women from Domestic Violence Act, 2005 (PWDVA)**, which offers civil remedies for women facing domestic violence. This act empowers women to seek legal protection and relief from abusive situations by granting them the right to obtain protection orders, residence rights, and financial compensation.

Protection officers, working in tandem with law enforcement, play a critical role in assisting women in navigating the legal process and ensuring their safety. These officers help women secure necessary orders, thereby facilitating the enforcement of their rights and protection from further harm.

The **Indian Penal Code** (**IPC**) also contains provisions that address various aspects of GBV, providing a legal basis for law enforcement to take action against offenders. **Section 498A** of the IPC addresses cruelty by a husband or his relatives, often invoked in cases of domestic violence. This provision aims to protect women from mental or physical abuse by their husbands or in-laws, with penalties that can include imprisonment and fines.

**Section 376** of the IPC is dedicated to the crime of rape, prescribing severe punishments, including life imprisonment or, in some cases, the death penalty for offenders. This section plays a key role in ensuring that sexual violence is met with strong legal consequences. Similarly, **Section 354** criminalizes the use of force or assault with the intent to outrage a woman's modesty, including crimes such as stalking, voyeurism, and sexual harassment, further reinforcing the legal framework to safeguard women's dignity and safety.

Another significant provision is **Section 304B**, which deals with dowry deaths. This section criminalizes the killing of a woman by her husband or his relatives due to dowry-related harassment, carrying stringent penalties for those found guilty.

In response to the growing concerns over sexual violence, the **Criminal Law** (Amendment) Act, 2013 was enacted, following the infamous Nirbhaya case, which brought global attention to the issue of sexual assault in India. The amendment broadened the definitions of rape and sexual assault, introduced harsher penalties for offenders, and included provisions to address other forms of gender-based violence such as acid attacks and stalking, reflecting the urgent need for a more comprehensive legal approach to sexual violence.

The Protection of Children from Sexual Offenses (POCSO) Act, 2012 was introduced to specifically address the sexual abuse and exploitation of minors. The POCSO Act mandates special procedures for law enforcement when handling cases involving children, ensuring that victims are treated with sensitivity and that their privacy is protected during investigations and trials.

Additionally, the **Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013** provides essential protection against sexual harassment at workplaces, aiming to create safer working environments for women. The act mandates that employers establish internal complaints committees to address any instances of harassment, ensuring that women have a formal avenue for redress.

## 4.2.2 The Role of Law Enforcement in Addressing Gender-Based Violence:

Law enforcement plays a critical role in addressing gender-based violence (GBV) at every stage, from prevention and initial response to investigation and prosecution. Their involvement is essential in safeguarding victims, gathering evidence, and ensuring that perpetrators are held accountable under the law.

#### **Prevention and Awareness:**

Prevention is one of the most important aspects of addressing GBV, and police officers are instrumental in raising awareness and educating communities about the legal framework protecting women. Law enforcement agencies often engage in community outreach programs, where they collaborate with local non-governmental organizations (NGOs), local authorities, and civil society groups to raise awareness about GBV laws.

These initiatives focus on educating both men and women about gender equality, women's rights, and available legal protections. In rural and marginalized areas, where access to information and resources is limited, the police work tirelessly to bridge the gap by offering training sessions, seminars, and community-based programs. By encouraging the reporting of GBV incidents and providing information about the legal recourse available, law enforcement helps empower communities to take action and break the silence surrounding gender-based violence.

## **Response to GBV Incidents:**

Police officers are often the first point of contact for victims of GBV. As first responders, their role is pivotal in ensuring that the victim's immediate needs are met with sensitivity and professionalism. The primary duties of police officers at this stage include:

- **Ensuring Victim Safety:** The immediate safety of the victim is a police officer's foremost concern. Officers are trained to provide immediate protection to victims, and, if necessary, they arrange for transportation to a safe location, such as a shelter or a secure home. In situations of acute danger, law enforcement may also intervene directly to protect the victim from further harm.
- Coordinating Medical and Psychological Support: Recognizing the physical and emotional trauma that GBV victims often endure, the police work in collaboration with medical professionals and mental health experts to ensure that the victim receives appropriate medical care. This may involve arranging for medical examinations to document injuries, providing access to counseling services, and connecting the victim with support groups or hotlines.
- Taking Victim Statements: One of the most sensitive tasks that police officers face in GBV cases is taking statements from the victim. Officers must ensure that the process is conducted in a compassionate, non-threatening manner, making the victim feel safe and respected. It is crucial that police do not re-traumatize the victim during this process and that the statement is recorded confidentially and accurately to serve as a vital part of the investigation.

## **Investigation and Evidence Collection:**

The police are responsible for gathering and preserving critical evidence that can substantiate the victim's claims. In cases of GBV, proper evidence collection is paramount, as it can make or break the case. Law enforcement agencies are trained to handle forensic evidence carefully to maintain its integrity, which may include physical evidence such as bruises, injuries, or traces of DNA, as well as testimonial evidence from witnesses and the victim.

In addition to physical evidence, police also investigate the background of the accused, potential motives, and any prior instances of violence, ensuring that all relevant information is gathered. Conducting thorough interviews with witnesses, family members, or neighbors who may have observed the incident or have knowledge of the victim's situation is also a key part of the investigation process. These steps are vital in establishing a solid case that can be presented in court.

### **Prosecution Support:**

Once the investigation has been completed and a case is prepared for court, law enforcement works closely with prosecutors and the judiciary to ensure that the legal process moves forward effectively. Police officers are responsible for presenting the evidence they have collected in a clear, organized manner. Their testimony and the evidence they provide play a crucial role in supporting the victim's case in court and substantiating the charges brought against the accused.

In addition to presenting evidence, law enforcement may also assist in the preparation of victim impact statements and other materials that help convey the full scope of the harm done to the victim. This support is essential in ensuring that the victim's voice is heard and that the judicial process is fair and transparent. Ultimately, the work done by law enforcement in investigating and preparing cases for prosecution plays a vital role in securing justice for victims of gender-based violence.

# **4.2.3** Challenges Faced by Law Enforcement in Combatting Gender-Based Violence in India:

Law enforcement officers in India face numerous challenges when handling gender-based violence (GBV) cases, which hinder their ability to provide justice and support to victims. These challenges are multifaceted and require systemic changes to ensure a more effective response to GBV incidents.

## **Underreporting of Cases:**

One of the most significant challenges in addressing GBV is the underreporting of incidents. Many victims, especially women, hesitate to report their experiences of violence due to various socio-cultural factors. In many parts of India, social stigma and the fear of societal judgment discourage women from seeking help. This fear is often compounded by the pressure from families and communities to remain silent about incidents of violence, as such

disclosures can bring shame to the victim and her family. Additionally, there is a widespread mistrust in law enforcement, with victims doubting the ability or willingness of the police to take their cases seriously or protect them from further harm. As a result, GBV cases often remain unreported, making it difficult for law enforcement agencies to assess the true extent of the problem and address it effectively. This underreporting not only allows perpetrators to go unpunished but also prevents the establishment of a clear, accurate picture of the prevalence of GBV in society.

## Lack of Training and Sensitivity:

While police officers in India are generally trained to handle crime, many lack the specialized skills and sensitivity required to deal with GBV cases. Gender-based violence is distinct from other forms of crime, as it involves complex dynamics related to power, control, and deeply entrenched societal attitudes toward women. A lack of understanding of these dynamics can lead to a dismissive or even hostile attitude toward victims, which exacerbates their trauma. In some cases, officers may resort to victim-blaming, questioning the victim's behavior, or dismissing her claims as exaggerated or untrue. This lack of empathy and professional sensitivity can discourage victims from reporting incidents or cooperating with investigations, fearing further victimization by the very system meant to protect them. Furthermore, without adequate training on how to conduct interviews in a trauma-informed manner, law enforcement officers may unintentionally re-traumatize victims during the investigation, further perpetuating the cycle of abuse and silencing potential victims.

#### **Resource Constraints:**

Another significant challenge in handling GBV cases is the lack of resources at many police stations, especially in rural and remote areas. In these locations, law enforcement agencies often operate with limited personnel, inadequate infrastructure, and a lack of essential resources such as forensic labs, transportation, and modern technology. The absence of properly trained officers who specialize in handling GBV cases means that the investigation process can be disorganized and inefficient. Additionally, limited access to forensic facilities and resources to collect and preserve critical evidence such as medical records, DNA samples, or physical evidence can significantly undermine the chances of successfully prosecuting perpetrators. In rural areas, the lack of reliable transportation for officers can delay investigations and prevent victims from receiving the timely support and protection they need. This resource gap can lead to delays in justice, a lack of victim support, and, ultimately, a failure to hold perpetrators accountable.

## **Legal and Procedural Barriers:**

India's legal and procedural framework for addressing GBV often faces criticism for being outdated, complex, and slow. Although there are laws in place to protect women from violence, such as the Protection of Women from Domestic Violence Act (PWDVA) and the Criminal Law (Amendment) Act, 2013, which increased penalties for offenses like rape and acid attacks, there are still significant procedural barriers that hinder the effectiveness of these laws. Some of these laws, while intended to protect victims, are often mired in

bureaucratic inefficiencies, lengthy legal processes, and lack of clarity, which can make it difficult for law enforcement to act swiftly and decisively. The judicial process is notoriously slow in India, and victims of GBV often experience long delays in obtaining justice due to clogged court systems, insufficient judges, and procedural delays. The long duration of cases can be discouraging for victims and their families, especially in a context where cultural norms pressure them to reconcile or withdraw complaints. As a result, many victims may lose faith in the justice system and decide to drop their cases, further perpetuating the cycle of violence.

# **4.2.4** Landmark Cases Shaping Law Enforcement's Role in Gender-Based Violence:

Several landmark cases in India have significantly shaped the role of law enforcement in combatting gender-based violence (GBV), emphasizing the importance of a more robust and proactive response to such incidents. These cases have influenced legal reforms and reinforced the responsibility of police officers in ensuring the protection of women and marginalized groups from gender-based violence. Below are some of the key cases that have had a lasting impact on how GBV is handled by law enforcement in India.

## 1. Vishaka v. State of Rajasthan<sup>1</sup>

The Vishaka v. State of Rajasthan case (1997) is a landmark ruling by the Supreme Court that profoundly influenced how sexual harassment at the workplace is addressed in India. The case arose when a woman was raped at her workplace, and there were no effective measures in place to protect her from such violence. In its judgment, the Supreme Court laid down the Vishaka Guidelines, which served as a comprehensive framework for dealing with sexual harassment at work. The case highlighted the responsibility of law enforcement in enforcing workplace protections for women. The guidelines mandated that employers must take preventive measures, provide a safe work environment, and establish mechanisms for addressing complaints of harassment. Moreover, the police were tasked with ensuring that victims received adequate protection and legal support. This case marked a turning point in recognizing workplace harassment as a form of gender-based violence and emphasized the proactive role of law enforcement in enforcing these legal provisions.

#### 2. Shakti Vahini v. Union of India<sup>2</sup>

The Shakti Vahini v. Union of India case (2018) was another crucial ruling that directed law enforcement to take stringent actions against honor killings and the protection of individuals at risk from community or familial opposition. The Supreme Court's judgment laid out comprehensive directives for police officers, requiring them to take swift and decisive action to prevent honor killings, which often occur in the context of forced marriages or relationships disapproved of by family or social groups. This judgment emphasized that law enforcement must prioritize the protection of vulnerable individuals

<sup>1 (1997), 6</sup> SCC 241

<sup>&</sup>lt;sup>2</sup> (2018) 7 SCC 192

and prevent violence based on outdated social customs. The court recognized that gender-based violence often arises from deeply ingrained patriarchal norms and social pressures, thus requiring law enforcement to take an active role in safeguarding the freedom and autonomy of individuals, particularly women, from familial and social violence.

## 3. Nirbhaya Case (Mukesh & Anr vs State for NCT of Delhi, 2017)<sup>3</sup>

The Nirbhaya Case (Mukesh & Anr vs State for NCT of Delhi, 2017) is perhaps one of the most well-known cases of gender-based violence in India, which led to major changes in the Indian legal landscape. This case, involving the brutal gang rape and murder of a young woman in Delhi, brought national attention to the issue of sexual violence against women. In the aftermath of the case, the Criminal Law (Amendment) Act, 2013 was enacted, which introduced stricter penalties for sexual offenses, including death penalties for rapists in extreme cases. The case also emphasized the importance of forensic evidence collection, the need for prompt medical care for victims, and the accountability of police officers in handling such sensitive cases. Law enforcement was mandated to improve their response times, ensure better training in handling sexual assault cases, and ensure that victims received necessary medical attention. The Nirbhaya case not only spotlighted the systemic failures in the legal and law enforcement response to sexual violence but also led to significant reforms aimed at improving the policing of GBV cases.

## 4. Laxmi v. Union of India<sup>4</sup>

The Laxmi v. Union of India case (2013) dealt with the issue of acid attacks, a particularly horrific form of gender-based violence in India. The case was brought by Laxmi, a survivor of an acid attack, who sought legal protection and compensation for victims of acid violence. The Supreme Court's ruling led to a series of important legal changes, including the restriction of acid sales, mandatory regulations for sellers, and the establishment of guidelines for the treatment and rehabilitation of acid attack survivors. The case underscored the proactive role that law enforcement must play in preventing acid attacks, enforcing the restrictions on acid sales, and supporting victims in accessing medical care and legal services. Police were given the responsibility of ensuring that acid attacks were thoroughly investigated and that perpetrators were held accountable. Furthermore, the case led to the creation of a national policy to aid the rehabilitation of acid attack survivors, emphasizing the need for comprehensive support from the state, including medical and financial aid.

These landmark cases in India have played a crucial role in shaping the legal and law enforcement response to gender-based violence. Each case has highlighted the need for a more effective, sensitive, and proactive approach by police officers and other stakeholders in addressing GBV. From the establishment of workplace harassment guidelines to stricter penalties for sexual assault and reforms in the treatment of acid attack survivors, these cases underscore the evolving nature of India's approach to combating gender-based violence. While these legal reforms have improved the response to GBV, continuous efforts are

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<sup>&</sup>lt;sup>3</sup> AIR 2017 SUPREME COURT 2161

<sup>&</sup>lt;sup>4</sup> (2014) 4 SCC 427

required to ensure that law enforcement officers are adequately trained, equipped with resources, and committed to upholding the rights of victims. Further legislative reforms, combined with effective policing strategies, are essential to ensuring that justice is served for all survivors of gender-based violence in India.

## 4.2.5 Best Practices and Initiatives for Law Enforcement in India:

India has introduced several key initiatives aimed at strengthening law enforcement's response to gender-based violence (GBV). These initiatives are designed to create more supportive environments for victims, improve accessibility to justice, and enhance the capacity of police to effectively handle cases of GBV.

All-Women Police Stations: In a bid to make reporting GBV more comfortable for women, several states in India have established all-women police stations. These stations are staffed entirely by female officers, creating a more approachable environment for female victims of violence. The presence of women police officers ensures that women can approach law enforcement without the fear of gender bias or insensitivity. These stations are particularly helpful in rural or conservative areas, where women might feel uncomfortable reporting to male officers. All-women police stations also help in reducing the stigma surrounding the reporting of such sensitive crimes, making it easier for women to seek help.

One-Stop Centers (OSCs): One of the most significant initiatives in India is the establishment of One-Stop Centers (OSCs), also known as Sakhi Centers. These centers are designed to provide a comprehensive, multi-disciplinary response to GBV cases. They offer a range of services under one roof, including police assistance, legal aid, medical support, and psychological counseling. Law enforcement officials, medical professionals, social workers, and legal aid providers collaborate to ensure that victims of violence receive holistic support. OSCs aim to reduce the trauma of victims by offering a seamless process from reporting the incident to receiving necessary support services, while also maintaining confidentiality and dignity.

**Mahila Help Desks:** Mahila Help Desks have been set up in many police stations across India to specifically address complaints from women, including cases of GBV. These desks are staffed by trained female officers who provide support to women victims in a confidential and empathetic manner. They act as a first point of contact for women who may feel uncomfortable going directly to the police, ensuring that complaints are handled with sensitivity and that victims are not subjected to victim-blaming or improper treatment. These help desks serve as an important tool for increasing the accessibility of law enforcement for women in distress.

**Nirbhaya Fund Initiatives:** In response to the 2012 Delhi gang rape case, the Government of India established the Nirbhaya Fund, a dedicated fund aimed at improving the safety and security of women. The Nirbhaya Fund supports various projects that enhance law enforcement's ability to respond to GBV effectively. Key initiatives funded by this scheme include the installation of panic buttons in public transportation systems, the deployment of CCTV cameras in high-risk areas, and the expansion of police training programs focusing on handling GBV cases.

The Nirbhaya Fund has been instrumental in equipping law enforcement agencies with the tools and resources they need to combat GBV more efficiently and prevent such crimes from occurring in the first place.

Use of Technology for GBV Reporting: Recognizing the barriers that victims may face when trying to report GBV, several states in India have embraced the use of technology to make law enforcement more accessible. Mobile applications and dedicated helplines have been developed to allow victims to report incidents of violence anonymously. These platforms provide a safe and confidential way for women to seek help, especially in cases where they fear retribution or social stigma. By leveraging technology, law enforcement can reach a wider audience and encourage victims, particularly in rural and underserved areas, to report their experiences without the need for physical interaction with the police. This innovative approach not only enhances the accessibility of law enforcement services but also empowers victims by giving them control over the reporting process. These initiatives demonstrate India's commitment to improving its response to gender-based violence and strengthening law enforcement's role in addressing this critical issue. By making reporting more accessible, offering comprehensive support services, and ensuring that police officers are better equipped to handle sensitive cases, India is moving toward a more victim-centered approach in combating GBV. However, continuous improvements in training, infrastructure, and legal frameworks are needed to further strengthen these efforts and ensure that all victims of GBV receive the justice and protection they deserve.3.7 Recommendations for Enhancing Law Enforcement's Role in Combatting GBV

**Increased Sensitivity Training:** Mandatory sensitivity and trauma-informed training for police officers, especially those handling GBV cases, can improve victim experiences and lead to higher reporting rates.

**Resource Allocation:** Providing police stations with adequate resources, such as vehicles, forensic tools, and staffing, will enhance their ability to respond to GBV incidents effectively.

**Strengthening Community Engagement:** Law enforcement should engage with local communities to build trust, educate citizens about GBV laws, and encourage reporting.

**Ensuring Accountability:** Introducing accountability mechanisms, such as external audits of GBV cases and anonymous feedback from victims, can help ensure that law enforcement agencies adhere to best practices.

**Expediting Forensic and Judicial Processes:** Streamlining forensic processes and fast-tracking GBV cases in court can reduce delays, providing timely justice to victims.

### 4.3 Conclusion:

Law enforcement plays an essential yet challenging role in combating gender-based violence (GBV) in India. While the legal framework provides a solid foundation for addressing these issues, law enforcement agencies must operate within this framework with sensitivity, efficiency, and an unwavering commitment to justice.

Effectively combating GBV requires law enforcement officers to go beyond just enforcing laws; they must also understand the complexities of gender-based violence and its impact on victims, making their response more empathetic and victim-centered.

To improve its response to GBV, Indian law enforcement needs to focus on enhancing the training of officers, particularly in handling sensitive cases. Specialized training programs that focus on issues like victim-blaming, gender sensitivity, trauma-informed care, and understanding the dynamics of violence against women are crucial. This training helps ensure that officers are equipped not only with legal knowledge but also with the skills to provide appropriate support to victims while maintaining professionalism and compassion. Law enforcement agencies must also prioritize community engagement initiatives that educate the public about GBV laws and encourage reporting of such incidents. By collaborating with non-governmental organizations (NGOs), local authorities, and other stakeholders, law enforcement can foster a culture of awareness and trust within communities, making it easier for victims to come forward and seek justice.

In addition to training and community outreach, victim support must be a cornerstone of law enforcement's approach to GBV. Ensuring that victims have access to safe spaces, legal aid, medical care, and psychological support is essential to helping them recover and seek justice. Victim support services, such as One-Stop Centers (OSCs) and Mahila Help Desks, offer comprehensive assistance to women affected by GBV, guiding them through the legal process and providing them with the resources they need to heal.

Landmark cases like Vishaka v. State of Rajasthan (1997), Shakti Vahini v. Union of India (2018), and the Nirbhaya case have had a profound impact on shaping the role of law enforcement in addressing GBV. These cases have led to significant reforms, including the establishment of stricter penalties, the creation of special police units, and the introduction of gender-sensitive protocols for handling GBV cases. Moreover, government initiatives such as the Nirbhaya Fund and the establishment of all-women police stations have further strengthened law enforcement's response to GBV by providing more resources, training, and infrastructure to handle these cases effectively.

Although these advancements, ongoing reforms are necessary to ensure that law enforcement agencies remain responsive and effective in addressing GBV. Law enforcement must remain committed to continuously improving its practices and adapting to the evolving nature of GBV. A sustained commitment to justice for victims and comprehensive reforms within the criminal justice system are essential to making a lasting impact and creating a safer society for women in India. The path to eradicating GBV requires collaboration, perseverance, and a collective effort from all stakeholders to ensure that the legal and law enforcement systems work together to protect and support victims while holding perpetrators accountable.