

## A STUDY ON INDIAN PENAL CODE - A MODERN APPROACH THROUGH E-LEARNING

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### ABSTRACT

The law develops and extends its dimension in various ways for the protection of right, but unlike the western countries, the issues of marital rape does not attract the attention of the law-makers for a long time, even though there are a number of debates on the topic in general. There are 36 countries in the world where marital rape is not a crime, like China, Pakistan etc. India's penal laws originated from the British laws due to colonization. However, in *R v R* case, pertaining to United Kingdom, the judge observed that for a husband to rape his wife is a crime. However, the husband's argument was that marriage gave him irrevocable consent; even though the court did not accept this argument and punished him. It was the observation of the court that for punishing a person the relationship of the concerned is not important. As far as India is concerned the rules are not so clear. Even in the case of *Arnesh M Kumar v State of Bihar*, the Supreme Court has observed that considering marital rape as a crime would be an utter failure of the systems of society and family set up. Not only this case, but multiple cases have also been filed to criminalize the marital rape, but till today the law allows the married women for rape if she is over the age of 18 years. It is a high time to treat women with dignity by protecting their body. It is the observation of Amita Pitre, at Oxfam India, "In India rape is not seen as an injury to a woman's personhood but as "damage to her family's honoring the modern social world, it is the need of the hour to amend the law relating to marital rape as rape is always a rape regardless of the marital status or age of the women.

**Key words:** Marital rape, criminalize, rights, dignity, body.

### Introduction

In the modern society, the law of the land has moved forward to protect the status of women in different direction, but the issue of marital rape was never a question among the Indians for a long time. It is due to lack of knowledge about women empowerment that the subject of marital rape has not been discussed in India so far; and another contributing factor is lack of literacy in India. The nature of Indian society is mostly patriarchal, where women are always treated as inferior in the family and the husband playing the dominant role. This is one of the important contributing factors, why the question of marital rape never arises, though the incident prevails secretly in many families and the wives are the silent victims. In general, our society believes that breaking a bond of marriage is unholy and against the society, though, indeed true in many senses, but in some corner, there is one wife, who wakes up every day sleeping next to her rapist. The tragedy may extend to such that the desire to live within her may vanish. The notable reason that may be held accountable in the country is that wife in the family is ignorant; illiterate; that results in the full devotion towards her husband and becoming very accustomed to fulfill the desire of her husband, even if it is against her will. One difficult condition that put a wife always silent is that, when it comes to marital rape, society accepts marriage with a religious ceremony as an institution duly accepted by society. The important question that arises is that the unwilling sex between the couple is not a rape just because of the marriage institution and just that the wife is of 18 years, when the element of rape is present in every action of the husband. Does it mean that a married woman does not have a right to privacy against her husband? The exemption of husbands from punishment against a marital rape is entirely contradictory to the objective of the fundamental rights, as the mental trauma of the woman is same irrespective of the factor of marriage. In the Indian family, marriage is often considered as an important ceremony regardless of the caste or status and it is also very clear that breaking a marriage bond by the wife on account of any reason is considered hideous in the society and a lot of stigma surrounds her from the date of her divorce. At the same time, this marriage can be the beginning of a painful life journey for many women, and often, women choose to be silent and bear the pain because of the social pressure. The reality of marital rape condition in India can be seen from International Men Gender Equality Survey conducted by International Centre for Research on Women, which observed that out of five men, one man forced his wife to have physical sexual relationship with him. Hence, this data shows that 20% of men in India accept that they compel their wives to have sexual relationships.

Historically, India was under the British till the partition of India. From the entry of the East India Company in 1612, many of the laws were formulated during the colonial period. As a result, the influence of the English people can be seen in many of our present laws. The concept of the above statement cannot be applied in the modern world scenario as it is a rights centric society that gives importance to every human right of man. In the recent case of the Indian apex court, Justice K.S. Puttaswamy vs. Union of India <sup>1</sup>(2018) accepted the fundamental right to privacy; that is to protect one's body against unwilling sexual intercourse. Justice K.S. Puttaswamy's case was again cited by Karuna Nundy, Advocate while arguing that privacy should not be used to hide patriarchal mindsets"

It is pertinent to mention that publication of materials through electronic media and various modes boost the multiplication of information and in the case of *Dharamraj Bhanushankar Dave v. State of Gujarat*, the Hon'ble High Court held that the petitioner was unable to provide any violation of the law by way of the publication of the court judgment that can be addressed under Article 226. It also held that publishing of any judgment or proceeding on a website would not come under the realm of 'reportable' as understood in context of judgments reported in a law reporter. Subsequently, the Hon'ble Madras High Court in *Karthick Theodore v. Registrar General*, after much deliberation, and considering various judgments of English Courts and the Supreme Court of India, including K.S. Puttaswamy (supra) held that the right to be forgotten could not exist in the context of judgments delivered by courts. It can, therefore, be taken as an established position of law that public access to judgments of Courts is an integral precept of the concept of open justice, promoting the rule of law.

### Literature review

The book on "Rape Laws in India the Heinous Crime" by Goel and Marwaha published on December (2019) is a book that tries to bring in perspective, the causes of the ever increasing Indian rape cases. It explains the lacunae of the law in practice. This book consists of a scholarly article by different authors of various domains.

Paradoxes of Marital Rape Laws in India by Paul, 1st edition ( 2021) focus on the social issues of rape in India. It discusses the various laws and challenges in the present society at large. It explains the multiple effect of rape on person and mentions the measures for mitigating the rape cases in India.

Pollak (2004) in, 'An Intergenerational Model of Domestic Violence' , deals with the degree and nature of violence, its extent and other factors for its manifestations very much lies on the nature on which the crime is carried out which has an aftermath on the gravity of violence suffered by the victim , thereby also affecting the victims vulnerability in the criminal justice system. The extent of vulnerability and violence committed therefore, is responsible in moulding the identity of victims by shaping hidden biases, prejudices and projections

Crenshaw (1989) added various dimensions to the problem of violence against women when she found the word intersectionality and the same can be found to be very relevant while dealing with violence in marriages and its complexities in families of higher or lower economic status, castes, communities, geographies in the Indian context.

Spieler (2011) in, 'The Maria da Penha Case and the Inter-American Commission on Human Rights: Contributions to the Debate on Domestic Violence Against Women' , deals with the States liability to make sure that the various institutions dealing with various crimes relating to matrimonial issues and its principle of due diligence laid down by International Commissions which is the global trends with respect to state responses to situations of matrimonial responses.

In Public Secrets of law: Rape trials in India by Baxi (2014), deals with the ethnographic account of rape trials that shows the socio-legal tolerance of sexual violence in India. It deals with the socio-legal processes underlying rape trials. It also deals with how the various guidelines of the Supreme court are routinely disobeyed. This book also deals with the various ways in which public secrecy is subjected to specific revelations in rape trials that brought injustice to the victim.

### Objective

To understand the actual condition of married women facing sexual assault from their partners; but could not do anything as they are married, bonded by religious and social ceremony. It also aims to highlight the actual performance of the present laws in India.

<sup>1</sup>Writ Petition (Civil) No. 494 OF 2012

### Scope

In this paper, the researcher limited the scope on rape law under the Indian Penal Code in the context of marriage.

### Methodology

In this paper, the data is collected by secondary methods like books, journals & Government Official Websites.

### Present status of law with regards to marital rape in India:

Marital rape means a husband does sexual assault with his wife against her willingness. The basic factor is lack of willingness of the wife for any sexual relationship due to whatever reasons thereof. Under Indian Penal Code Section 375 includes every form of sexual assault without permission of a woman.<sup>2</sup> Under Section 375, Exception 2 mentions that unwilling sexual assault between husband and wife over fifteen years of age gives exception from prosecution. As per the present law in India, a wife has given permanent consent to have physical relationship with her husband after her marriage with him. It is very sad that in India, even though, man and women are a separate legal entity, man has the right to rape a wife under the umbrella of social institution named marriage solemnized by religious ceremony.

### Status of Rape Cases in India<sup>3</sup>

From the table below, it is evident that rape occurred every day. The crime of sexual offence against children shows a rapid growth in the country. If the reported number of cases relating to sexual offenses against women and children is so high every year, there will also be large number of cases that remain unreported due to many reasons. If India recognized marital rape and criminalized it, the number of cases relating to rape would be much higher. If the dignity of women and children are humiliated and violated every year in their own country, it is the duty of the Government to take effective steps towards the protection of women, whether they are married, minor or unmarried women; because victims are mostly female in every situation. Allowing of rape under the umbrella of marriage does not bring justice to the victim of marital rape and sexual violence by a man is always same whether he is the husband or another man.

Year	Number of rape	Crime under IPC	POCSO	Total Cognizable IPC Crimes & Cognizable SLL Crimes (States and UT)
2015	34,651	2949400		4710676
2016	38,947	2975711	36,022	4831515
2017	32,559	3062579	32,608	5007044
2018	33,356	3132955	39827	5074634
2019	32,033	3225701	47335	5156172
2020	28,046	4254356	47221	6601285
2021	31,677	3663360	53874	6096310

### Steps taken to criminalized marital rape: -

India is a democratic country that has not criminalized marital rape like China, Saudi Arabia and Pakistan, when more than 74 countries in the world have criminalized it.<sup>4</sup> According to International Men and Gender Equity Survey 2011, out of five men, one men compel his wife to have a sexual inter-course and 14% of married women face a marital rape in India as per the New 18.com.<sup>5</sup> The first innovative step was taken with the J S Verma Committee, which UPA government has taken up in December 2012 and recommended that forced sex with own wife should amount to rape by husband. In short, the recommendation of the Committee is to remove exception mentioned under IPC and the law should be modified in such a way that marriage should not be made

<sup>2</sup> Kumar Askand Pundey, B.M Gandhi's Indian Penal Code (2017), Eastern Book Company( 4th edition, reprint 2019)

<sup>3</sup> <https://ncrb.gov.in/en/Crime-in-India-2021>

<sup>4</sup> [www.insightsonindia.com/2022/01/17/plea-for-marital-rape-to-be-criminalised/](http://www.insightsonindia.com/2022/01/17/plea-for-marital-rape-to-be-criminalised/)

<sup>5</sup> Live discussion on 17,January, 2022(CNN New 18)

as a justification for a severe crime like rape or sexual violation.<sup>6</sup> Also during the year 2013 the UN Committee has strongly suggested that Government of India should consider marital rape as a crime. On the other hand, the 172 Law Commission Report refuses to criminalize the marital rape on different ground.

In the case of *Suchita Srivastava v. Chandigarh Administration*,<sup>7</sup> the apex court related the right to make choices on acts of sex with citizens' fundamental right to personal liberty, privacy, dignity, and bodily integrity under Article 21 of the Constitution. *Justice K.S. Puttuswamy (Retd.) v. Union of India*,<sup>8</sup> The apex court stressed the importance of the fundamental right, which guarantees to all citizens the right to privacy. This privacy includes privacy in respect to sexual relationships too.

This exemption of rape under the definition of rape has been challenged. From Delhi High court Justice Rajiv Shakdher was dealing with the case originated from RIT Foundation Vs Union of India W.P. (C) No.284/2015 (India) in 2015; wherein Government has opposed the criminalization of marital rape as it can destabilized and impair the institution of marriage. This is one of the common points of critique, who are against criminalization of marital rape. The matter is still pending in Delhi High Court, which gives exemption to Section 375 of IPC for forceful sexual assaulted exemption to a man from having sexual relationship with his own wife without her consent, which is an offence of rape.<sup>9</sup>

RIT foundation has taken an active step towards encouraging social equity and gender equity in India as a whole and the women in her families as well. The said case was filed by Chitra Awasthi, social worker of the foundation and states the reason for her pursuance of the case. It was about ten years ago, there was a female worker. She had a husband, who was drunk and did not do any job. He used to demand money from her for money to have alcoholic drink. In case this poor lady could not provide sufficient money for his liquor, he used to rape her without her consent. This situation continued for many years; as this poor lady was not knowing her rights against her own body, and hence she did not tell anybody. Though the case is still pending in the High Court of Delhi, still in India it is the most awaited verdict like the Nirbhaya Rape Case; especially women are looking forward to what the Delhi High Court would bring forward for the future of women. In the last few years, the court has struck down Sec 377, which criminalized gay sex and Sec 497 that punish male adultery on the ground of violation of the constitution. If the same ground is enforced by the court, many women will be free from their sexual prison. Women will step into the new world with a right to say "No" when sex is demanded by her husband. Consent of both the parties will be a necessary element for sexual intercourse within marriage if the case wins the demand of the women.

In the case of *Independent Thought V. Union of India*,<sup>10</sup> the apex court of India on October 11, 2017, mentioned that Section 375, Exception 2, of IPC should be struck down, if it is related to girl child below 18 years affected seriously in following situations, where it violates to Articles 14, 15 and 21 of Indian Constitution; and it is not in consistency with POCSO. Hence Indian Penal Code Section 375, Exception 2 should be struck down even if the wife is not below 18 years, as it is not rape by a man with own wife if she is above 18 years in the present law.

#### **International Law for the protection of women against sexual violence:**

According to CEDAW, categorically stated that discrimination against women includes whatever bodily, mental, emotional, or sexual injury to women (GR-19). In addition to that there is an alteration in definition of

<sup>6</sup> Jagriti Chandra, Key judgments puncture government's defense on marital rape (5, march, 2022), <https://www.thehindu.com/news/national/key-judgments-puncture-governments-defense-on-marital-rape/article38267927.ece>

<sup>7</sup> *Suchita Srivastava vs. Chandigarh Administration*, Civil Appeal No.5845 OF 2009 (Arising out of S.L.P. (C) No. 17985 of 2009)

<sup>8</sup> *K.S. Puttuswamy (Retd.) vs. Union of India*, Writ Petition (Civil) No 494 of 2012;

<sup>9</sup> *Nupur Thapliyal, Marital Rape: Delhi High Court Reserves Judgment In Petitions Challenging Exception To Sec. 375 IPC* (10, march, 2022), <https://www.livelaw.in/news-updates/marital-rape-delhi-high-court-reserves-judgment-exception-sec-375-ipc-192450>

<sup>10</sup> *Independent Thought Vs. Union of India*, W.P. (c) No. 382 of 2013 (India).

GR-19 and this alteration states that marital rape is rape, as it lacks free consent and coercion involved<sup>11</sup>. India being a signatory to the CEDAW, is expected to amend and revise the law with regards to the recommendation but till today it failed to do so. This action of India breaches the international human rights standard. India's failure to criminalize the marital rape not only breaches the CEDAW, but also ICCPR, UDHR, Beijing Declaration, and DEVAW. As per ICCPR Articles states that all human beings are equal as far as law is concerned and have the entitlement to equal protection before law, against any discrimination on account of caste, creed, sex or other status.

All human beings are free and equal in dignity and rights, according to UDHR Article 1 and people are equal and free as far as rights and dignity are concerned; and under UDHR Article 28 humans are entitled to a social and international framework in which the declaration's rights and freedoms can be fully acknowledged. As a signatory to the above, India is obliged to encourage the bodily autonomy of the body of women, who are married.<sup>12</sup> The Declaration at Beijing also recommended to all governments of the world for implementing the CEDAW and for changing laws and penal codes, which are against this declaration.

### Suggestion

Allowing marital rape in the country violated the rights of women to live with dignity under Indian Constitution. Under Indian Constitution, Article 21 speaks on right to live with dignity. The Hon'ble Supreme Court in Francis Vs Union Territory AIR 1981 SC 746 mentioned that right to life include right to live with dignity; and this opens a wider door to include various kinds of rights within it. So, if a female member of the house is unable to life of dignity with her own husband it indirectly deprived her rights to life with dignity through Indian Penal Code. Since man cannot be raped forcefully by women, the right to equality before law should be maintained by enabling the deletion of exception clause. Under Indian Penal Code, Section 375, Exception 2, as a married man can rape his wife under law and a woman has no chance of raping a man; hence there is presence of gender inequality of law. Further, State of Karnataka Vs Krishnappa, the court commented that physical violation and humiliation both are against the provisions of law, and it is interference into a woman's privacy and holiness of a woman. In addition to that court held that any physical relationship without consent of a woman amounts to sexual violence".<sup>13</sup>

The main critical point of deletion of Indian Penal Code, Section 375, Exception 2, is that, protection of women against marital rape can result in the huge number of false allegation by women, so, in case of criminalization of marital rape by the law, a penal provision for false accusation of the husband is to be included to protect them from constant harassment by the wife. India has witnessed an enormous number of false accusations against helpless husbands or husband families under the Dowry Prohibition Act and the Domestic Violence Act. If a marital rape is criminalized, the proof beyond reasonable doubt should not be applied in the marital rape. It should be remembered that every law is open to abuse and criticism, and every crime has to be proved.

In case of criminalization of marital rape, the onus of proof should be on the wife or else the court will be overburden. Many critics argue that direct evidence will not be available for what is done in the bed privately by the couple. But circumstantial evidence can play a vital role in trial of the case. In case of marital rape, when the proving responsibility is on the victim, direct evidence can be obtained with the help of medical practitioner by the victim women as an unwilling sex may result in changes on the part of vagina by showing abrasion, swelling or hematoma etc.

High Court of India has approved a justification ground for divorce of rape by a husband without the consent of his wife. If these judgments are introduced in the personal laws/ secular law or the customary law, justice will be achieved by many women. Recently, on 30th July, 2021, High Court of Kerala held that in India marital rape is

<sup>11</sup> Lexlifeeditor Marital Rape: A Question of Sexual Autonomy of Married Women(6, March, 2022), [lexlife.in/2022/03/06/marital-rape-a-question-of-sexual-autonomy-of-married-women/](https://lexlife.in/2022/03/06/marital-rape-a-question-of-sexual-autonomy-of-married-women/)

<sup>12</sup> United Nations. Universal Declaration of Human Rights. (UN, New York, December 1948). Article 28, <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

<sup>13</sup> State of Karnataka v. Krishnappa, ILR 1994 KAR 89, 1993 (Equivalent citations: 2000 CriLJ 1793, JT 2000 (3) SC 516, 2000 (2) SCALE 610, (2000) 4 SCC 75, 2000 2 SCR 761, 2000 (2) UJ 919 SC)



not regarded as a criminal offence, it can be a justification for applying for divorce.<sup>14</sup> The court commented that a wife and husband are partners; but both are equal and have equal rights and nobody is superior to other with respect of body and identity; and that marital rape constitutes autonomy of individual. This amounts to cruelty.<sup>15</sup> Justice A. Muhamed Mustaque and Justice Kauser Edappagath held that just because under our present law marital rape is not a punishable offence, it does not mean that marital rape cannot be ground for granting divorce against the husband.<sup>16</sup> In case marital rape is considered as a justification for divorce under various Indian laws and other customary laws, the torture through marital undergone by many women would achieved relief as marital rape involved physical assault, mental and emotional force against the them.

### Conclusion and Findings

If marital rape is criminalized, it may destabilize the institution of marriage and may in-directly cause a disorganization of society to many extents. However, protecting the institution of marriage to that extent may result in the violation of natural rights of women. Marriage cannot be seen as permission to compel physical relations. The objective of Section 375 is for protecting women and penal action against those who violates through cruel acts; and this cannot be achieved by giving exemption to a husband for marital rape without consent of his wife as the mental and physical agony are same whether a woman is married or not.

Marital rape exception in 375 IPC should be strike out as rape can happen at any age, not only below the age of 18 years or 15 years women and women should not be a victim of rape under the ceremony of marriage. As per the health survey held by Government of India 2019-20, approximately 30% of women between the age of 18 and 49 experienced violence by their husbands. The sexual violence faced by Indian women is 17 times greater from husbands than outsiders. Allowing to remain the exception 2 of 375 IPC result in the allowance of rape to women without considering the age and under the umbrella of marriage. Careful consideration should be given as sexual assaults unlike the other violent crime result in impact on psychology of women. General awareness among the people by educating them in considering women as important life partners is a task on priority, similar to enact laws to protect the human rights of women. By doing so husbands will not have sexual intercourse without the consent of their wives. If a married man forcefully slept with his wife, he will have to face the legal consequences, and this may reduce the instances of marital rape, if it is criminalized. Having sex without consent and violence from husbands are violation of human rights and fundamental rights of women. It is also affects India's global image as we are signatory of CEDAW, which works against women's discrimination. The crime of marital rape is not in consistency with the international commitments.<sup>17</sup>

<sup>14</sup>Sanyukta Dharmadikari, High Court of Kerala considers marital rape as a justification for divorce.. Retrieved from [<sup>15</sup>Kashish Khandelwal, Indian Courts hold marital rape constitute a ground for divorce \(7, August, 2021\) <https://www.jurist.org/news/2021/08/india-court-holds-marital-rape-constitutes-sufficient-grounds-for-divorce/>](https://www.thenewsminute.com/article/landmark-judgment-kerala-hc-recognises-marital-rape-ground-divorce-153556#:~:text=CRYPTO-,In%20a%20landmark%20, on 26th August, 2022.</a></p>
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<sup>16</sup> Special Correspondent, "Marital rape a ground for divorce, rules Kerala HC". <https://www.thehindu.com/news/national/kerala/marital-rape-a-ground-for-divorce-rules-kerala-hc/article35768148.ece>

<sup>17</sup>Sreeparna Chattopadhyay, The country must criminalized marital rape right away( 24, januanry, 2022),<https://www.livemint.com/opinion/online-views/the-country-must-criminalize-marital-rape-right-away-11643044014398.html>

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