Original Article ISSN (Online): 2582-7472

COMBATING HUMAN TRAFFICKING IN THE PRESENT INDIAN ERA

Rajesh Khatker ¹, Dr. Suresh Bhaira ²

- ¹ Research Scholar, Department of Law, Apex University, Jaipur, India
- ² Professor, Department of Law, Apex University, Jaipur, India





DOI 10.29121/shodhkosh.v5.i2.2024.638

Funding: This research received no specific grant from any funding agency in the public, commercial, or not-for-profit sectors.

Copyright: © 2024 The Author(s). This work is licensed under a Creative Commons Attribution 4.0 International License.

With the license CC-BY, authors retain the copyright, allowing anyone to download, reuse, re-print, modify, distribute, and/or copy their contribution. The work must be properly attributed to its author.



ABSTRACT

Human trafficking is one of the most heinous crimes that undermines the dignity and fundamental rights of individuals. India, due to its socio-economic disparities, porous borders, and complex socio-cultural dynamics, faces significant challenges in eradicating this modern-day form of slavery. This paper explores the prevalence, causes, patterns, and consequences of human trafficking in India. It also provides recommendations for strengthening existing mechanisms to effectively combat human trafficking in the present Indian era.

Keywords: Human Trafficking, Present, Indian Era

1. INTRODUCTION

Human trafficking has emerged as one of the gravest human rights violations in contemporary society. The United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons (2000), supplementing the United Nations Convention against Transnational Organized Crime, defines trafficking as the recruitment, transportation, transfer, harboring, or receipt of persons by means of coercion, fraud, deception, abuse of power, or exploitation of vulnerability for purposes of exploitation. Exploitation, as articulated in the Protocol, includes but is not limited to forced labour, sexual servitude, slavery-like practices, removal of organs, and other forms of abuse that deprive individuals of their autonomy and dignity. In the Indian context, the manifestation of human trafficking has been multifaceted, encompassing commercial sexual exploitation, forced and bonded labour, child trafficking for labour and begging, and, in rare but significant cases, trafficking for organ trade.¹

India's socio-economic disparities, coupled with entrenched gender inequality, caste-based hierarchies, and large-scale migration, have created fertile ground for trafficking networks to thrive. Despite the existence of progressive legislation such as the Immoral Traffic (Prevention) Act, 1956, and institutional frameworks under the Ministry of Women and Child Development, trafficking persists in both visible and invisible forms.² Women, children, and

¹ Kara, Sex Trafficking: Inside the Business of Modern Slavery, 2009.

² Chakraborty, "Human Trafficking in India: Legal Protection and Judicial Response," Journal of the Indian Law Institute, Vol. 58, 2016.

marginalized groups remain disproportionately affected, often coerced into exploitative circumstances under the guise of employment opportunities or through outright abduction.

The persistence of trafficking in India is a paradox that reflects gaps between law and enforcement. While the Indian judiciary has repeatedly acknowledged the seriousness of trafficking and underscored its incompatibility with the constitutional guarantee of dignity under Article 21 of the Constitution of India, the lived reality demonstrates systemic weaknesses in addressing prevention, prosecution, and rehabilitation. Thus, the need to critically examine the present landscape of human trafficking in India is imperative. This paper explores the historical background of trafficking, the current scenario as reported by official and non-official sources, and the structural challenges that perpetuate this organized crime.

1.1. FORMS OF TRAFFICKING IN INDIA

Human trafficking in India manifests in diverse and complex forms, each rooted in specific socio-economic conditions and often interlinked with global criminal networks. The forms of trafficking that dominate the Indian landscape include sex trafficking, labour trafficking, child trafficking, organ trafficking, and cross-border trafficking. Scholars and international agencies consistently highlight that these forms are not mutually exclusive; rather, they often overlap, with victims subjected to multiple kinds of exploitation simultaneously.³

One of the most pervasive forms is sex trafficking, which disproportionately affects women and girls. Victims are often lured through false promises of employment, marriage, or education, only to be coerced or deceived into the commercial sex industry. India's red-light districts, such as those in Sonagachi (Kolkata), Kamathipura (Mumbai), and G.B. Road (Delhi), are notorious sites where trafficking victims are forced into prostitution. A study by Joffres et al. notes that many trafficked women experience severe violence, confinement, and psychological trauma, making rehabilitation extremely difficult. This form of trafficking thrives not only in urban centers but also in rural settings where demand for commercial sex is clandestine. Despite legislation like the Immoral Traffic (Prevention) Act, 1956, sex trafficking remains one of the most entrenched problems in India.

Another significant form is labour trafficking, which primarily exploits men, women, and children in industries such as construction, agriculture, manufacturing, domestic service, and brick kilns. Victims are often subjected to exploitative working conditions, denial of wages, and physical abuse. The International Labour Organization (ILO) estimates that India is home to millions of bonded and forced labourers, making it one of the largest sources of trafficked labour in the world (Srivastava, "Bonded Labour in India: Its Incidence and Pattern," ILO Working Paper, 2005). Cases of entire families being trapped in cycles of debt bondage are widely documented. Migrant workers from impoverished states such as Bihar, Odisha, and Uttar Pradesh are particularly vulnerable, with traffickers capitalizing on their lack of resources and opportunities.

Closely linked to both sex and labour trafficking is child trafficking, which continues to be a grave concern in India. Children are trafficked for multiple exploitative purposes, including child labour, sexual exploitation, forced begging, illegal adoption, and even participation in armed conflict in some regions. Kailash Satyarthi's Bachpan Bachao Andolan has documented extensive evidence of children being trafficked into carpet weaving, agriculture, and domestic servitude. The National Human Rights Commission's 2005 report on child trafficking underscored the organized nature of these crimes, where children are moved across state borders and sold into exploitative work environments. Child trafficking violates multiple rights enshrined in the Juvenile Justice (Care and Protection of Children) Act, 2015, as well as the Protection of Children from Sexual Offences (POCSO) Act, 2012. The persistence of this form reflects both demand for cheap labour and systemic failures in child protection mechanisms.

A more sinister but less frequently discussed form is organ trafficking. India has been identified as a hub for the illegal trade of human organs, particularly kidneys. Vulnerable individuals from impoverished backgrounds are coerced or deceived into parting with their organs, often under the guise of medical treatment or in exchange for money they never actually receive. Scheper-Hughes' global ethnographic research on organ trade reveals India's involvement in international transplant tourism, where foreign patients travel to India to procure organs at a fraction of the cost.⁵

³ Kara, Modern Slavery: A Global Perspective, 2017.

⁴ Sexual Slavery without Borders, International Journal for Equity in Health, Vol. 7, 2008.

⁵ Journal of Medical Ethics, Vol. 32, 2006.

Although the Transplantation of Human Organs and Tissues Act, 1994, criminalizes commercial organ trade, weak enforcement and corruption enable the persistence of this exploitative practice.

Finally, cross-border trafficking remains a major challenge due to India's geographical location and porous borders. Victims are trafficked into India primarily from neighboring countries such as Nepal, Bangladesh, and Myanmar, with women and children comprising the majority. Bangladesh, for instance, is a significant source country for trafficked women who are brought into India for commercial sexual exploitation. Similarly, Nepalese children and women are trafficked into India under the pretext of domestic work or marriage. India also serves as a transit country for victims trafficked onwards to the Middle East and Southeast Asia. The transnational character of this crime necessitates robust cooperation between states, but weak bilateral enforcement often hampers efforts at victim rescue and repatriation.

2. CAUSES OF HUMAN TRAFFICKING IN INDIA

The persistence of trafficking in India is not merely the result of individual criminality but is deeply rooted in structural and systemic causes. Scholars argue that trafficking thrives in environments marked by economic deprivation, social inequality, and weak governance. Key causal factors include poverty, gender inequality, illiteracy, migration, demand for cheap labour and sex, and inadequate law enforcement. Poverty and unemployment remain the foremost drivers of human trafficking. India, despite its rapid economic growth, continues to have vast pockets of poverty, particularly in rural areas. Families struggling to meet basic needs are easily lured by traffickers who promise lucrative jobs in cities or abroad. Once recruited, these individuals often find themselves trapped in exploitative environments with little chance of escape. Studies by the ILO highlight that poverty-induced vulnerabilities increase the likelihood of individuals falling prey to bonded labour and trafficking schemes. The intersection of poverty with lack of economic opportunities creates a vicious cycle that traffickers exploit with precision.

Another critical factor is gender inequality, which exacerbates women's susceptibility to trafficking. In India's patriarchal society, women often lack decision-making power, access to education, and economic independence. Practices such as dowry, early marriage, and domestic violence further diminish their autonomy, making them vulnerable to deceptive recruitment practices. Research by Siddharth Kara emphasizes that gender-based discrimination is central to sex trafficking in South Asia, where women are commodified and subjected to extreme exploitation. This structural inequality ensures that women disproportionately bear the brunt of trafficking.

Closely tied to poverty and gender inequality is illiteracy and lack of awareness. Many victims are unaware of their rights or the dangers of trafficking, which makes them more susceptible to deceptive promises of employment or marriage. In rural and tribal areas, limited access to education perpetuates ignorance about legal protections. A study by Pandey in the Indian Journal of Social Work (2015) highlights that awareness campaigns and education significantly reduce vulnerability to trafficking, underscoring the role of literacy in prevention.

Migration and displacement also contribute to trafficking vulnerabilities. Large-scale migration, whether due to economic aspirations, natural disasters, or conflicts, often leads individuals into precarious situations where traffickers exploit their desperation. The 2004 Indian Ocean tsunami and subsequent displacements, for instance, saw a spike in child trafficking cases in Tamil Nadu and Andhra Pradesh. Similarly, seasonal migration from drought-prone areas frequently results in trafficking of entire families into exploitative labour conditions.

The demand for cheap labour and commercial sex acts as a constant pull factor for traffickers. Industries seeking to cut costs often turn a blind eye to exploitative labour practices, creating a market for trafficked labour. Likewise, the persistent demand for commercial sex sustains trafficking networks that supply women and girls to brothels and clandestine sex markets. A report by the United Nations Office on Drugs and Crime (UNODC) in 2016 underscores that trafficking flourishes in markets where demand for illicit services remains unchecked.¹⁰

Finally, weak law enforcement allows trafficking to persist despite strong legal frameworks. Corruption among police officers, lack of training in victim identification, and inadequate resources severely hamper effective policing. Low conviction rates, as highlighted in NCRB data, embolden traffickers and discourage victims from reporting crimes. Jha's

⁶ Pati and Panigrahi, Human Trafficking in South Asia, 2010.

⁷ Chakraborty, "Human Trafficking in India: Legal Protection and Judicial Response," Journal of the Indian Law Institute, Vol. 58, 2016.

⁸ ILO, Global Report on Forced Labour, 2012.

⁹ Sex Trafficking: Inside the Business of Modern Slavery, 2009.

¹⁰ UNODC Global Report on Trafficking in Persons, 2016.

analysis in the Indian Journal of Criminology (2019) points out that unless enforcement mechanisms are strengthened and accountability enhanced, trafficking networks will continue to operate with impunity.

2.1. CHALLENGES IN COMBATING HUMAN TRAFFICKING IN INDIA

Human trafficking, despite being prohibited under multiple international and domestic instruments, continues to flourish in India. The persistence of this crime, notwithstanding progressive legislation such as the Immoral Traffic (Prevention) Act, 1956, the Bonded Labour System (Abolition) Act, 1976, and the constitutional guarantee of dignity under Article 21, exposes critical weaknesses in implementation and enforcement. Scholars point out that the effectiveness of anti-trafficking measures depends not merely on the enactment of laws but on their proper enforcement, monitoring, and coordination across institutions. This section explores the key challenges in combating trafficking in India, with a focus on implementation gaps, victim identification, judicial delays, organized crime networks, cross-border complexities, and the problem of social stigma.

Implementation Gaps: One of the most persistent challenges in addressing trafficking in India is the gap between legislation and implementation. While India has adopted comprehensive legal frameworks, the enforcement of these laws remains weak. The National Crime Records Bureau (NCRB) routinely reports thousands of trafficking cases every year, yet conviction rates remain strikingly low. This is often due to inadequate investigation, lack of coordination between agencies, and insufficient training of law enforcement officials in identifying and handling trafficking cases. Implementation gaps also arise from the fragmented nature of anti-trafficking efforts. Different ministries and departments operate parallel schemes without adequate integration, leading to duplication and inefficiency. For example, while the Ministry of Women and Child Development oversees schemes like Ujjawala for the rehabilitation of trafficked women, state police units often lack the resources to ensure rescue and reintegration. As Srivastava notes, the absence of "institutional synergy" undermines the ability of the state to provide a holistic response to trafficking. This lack of effective implementation allows traffickers to exploit systemic loopholes, perpetuating cycles of exploitation.

Victim Identification and Support: Another critical challenge is the identification of victims and provision of adequate support. Many trafficking victims remain invisible, either because they are hidden in informal labour markets or because they fear reporting due to threats from traffickers. Child labourers in industries such as brick kilns or agriculture, for instance, often go unnoticed as exploitation is normalized within these sectors. Kailash Satyarthi's Bachpan Bachao Andolan has repeatedly highlighted that large numbers of trafficked children are never formally identified by state mechanisms. Even when victims are rescued, rehabilitation remains inadequate. Shelter homes frequently lack proper facilities, psychological counseling, or vocational training. A report by the National Human Rights Commission (NHRC) in 2005 revealed that many victims experience re-traumatization in state-run institutions due to poor living conditions and lack of sensitivity among officials. Moreover, reintegration into society is often unsuccessful because victims lack economic independence or face stigma, forcing some back into exploitative circumstances. This failure to provide victim-centric rehabilitation undermines the broader objectives of anti-trafficking frameworks.

Judicial Delays: Judicial inefficiency presents another major obstacle in combating trafficking. Cases of trafficking often take years to be prosecuted, and conviction rates remain abysmally low. According to NCRB data, less than 30 percent of trafficking cases result in conviction, with many being dismissed due to lack of evidence or hostile witnesses. ¹² Victims, often traumatized and intimidated by traffickers, are reluctant to testify, and inadequate witness protection exacerbates this reluctance. Delays also arise from the overburdened judiciary. Courts in India face enormous backlogs, which prolongs the resolution of trafficking cases. In Bandhua Mukti Morcha v. Union of India ¹³, the Supreme Court recognized bonded labour and trafficking as violations of fundamental rights, yet even after decades of judicial acknowledgment, effective remedies remain elusive. As Jha notes, the absence of fast-track courts for trafficking cases means that survivors often lose faith in the justice system, which in turn benefits traffickers who operate with impunity. ¹⁴

Organized Crime Networks: Human trafficking in India is not merely an isolated crime but part of larger organized criminal networks. These networks are highly adaptive, sophisticated, and often connected with other illicit activities such as drug trafficking, arms smuggling, and money laundering. The United Nations Office on Drugs and Crime (UNODC)

¹¹ Chakraborty, "Human Trafficking in India: Legal Protection and Judicial Response," Journal of the Indian Law Institute, Vol. 58, 2016.

¹² NCRB, Crime in India, 2020.

¹³ AIR 1984 SC 802.

¹⁴ Trafficking and Criminal Justice in India, Indian Journal of Criminology, Vol. 47, 2019.

has emphasized that trafficking thrives because it is "low-risk but high-profit," enabling traffickers to operate with relative impunity. ¹⁵ In India, traffickers often enjoy political protection or collusion with corrupt officials. This enables them to evade detection, manipulate investigations, or intimidate victims. The involvement of organized groups also makes trafficking transnational, as networks move victims across borders with ease. Banerjee highlights that the porous borders of West Bengal and Assam facilitate large-scale cross-border trafficking with Bangladesh and Nepal. ¹⁶ Disrupting such networks requires not only national-level enforcement but also international cooperation, which remains limited.

Cross-Border Complexities: India's geographical location makes it particularly vulnerable to cross-border trafficking. Victims are trafficked into India from Nepal, Bangladesh, and Myanmar, while India also serves as a transit point for victims moved to the Middle East and Southeast Asia. However, combating this cross-border dimension is complicated by weak bilateral enforcement mechanisms and lack of coordination between neighboring countries. For example, while India and Bangladesh have signed Memorandums of Understanding on human trafficking, implementation has remained uneven. Victim repatriation is often delayed due to bureaucratic hurdles and lack of clarity on nationality, leaving survivors stranded for years in shelter homes. Pati and Panigrahi argue that the "absence of harmonized legal frameworks" across South Asia undermines collective efforts against trafficking. Furthermore, differences in law enforcement capacity, corruption, and political will across borders complicate rescue and rehabilitation efforts. Unless greater regional cooperation is fostered, cross-border trafficking will continue to challenge India's anti-trafficking efforts.

Social Stigma: Finally, the problem of social stigma poses a significant challenge to the reintegration of trafficking survivors. Victims, especially women and children trafficked for sexual exploitation, often face ostracization from their families and communities upon return. This stigma not only hampers their psychological recovery but also pushes them back into cycles of exploitation, as they lack social acceptance and economic opportunities. Sociological studies highlight that survivors of sex trafficking are frequently perceived as complicit in their exploitation rather than as victims of coercion. This misperception fosters victim-blaming and discourages survivors from seeking legal recourse. In rural areas, patriarchal attitudes and notions of family honor often result in trafficked women being abandoned or forced into re-exploitation. As Chakraborty observes, without addressing these cultural and societal attitudes, legal reforms alone will remain insufficient. Addressing stigma requires community-level awareness campaigns, survivor-led advocacy, and policies that promote socio-economic reintegration.

3. CONCLUSION & RECOMMENDATIONS:

Human trafficking in India remains one of the gravest challenges to human rights and the rule of law. Despite strong constitutional guarantees, comprehensive legislation, and active civil society engagement, trafficking continues to thrive, exploiting vulnerabilities rooted in poverty, inequality, and weak governance. The recommendations discussed above highlight that combating trafficking requires more than piecemeal interventions; it demands a holistic, multi-stakeholder approach that addresses both the supply and demand sides of trafficking.

Strengthened law enforcement, coupled with survivor-centric rehabilitation, can break the cycle of exploitation and re-trafficking. Community participation ensures vigilance at the grassroots, while technological innovations provide new tools to identify and disrupt trafficking networks. Regional cooperation is indispensable for tackling cross-border trafficking, and educational campaigns play a preventive role by empowering vulnerable populations with knowledge. Ensuring corporate accountability addresses the demand for cheap labour, while fast-track courts strengthen deterrence by reducing impunity.

As Chakraborty argues, trafficking is not merely a criminal law issue but a broader human rights challenge that reflects systemic failures. Thus, combating trafficking in the present Indian era requires sustained political will, coordinated institutional responses, and societal transformation. Only through collective and sustained efforts can India hope to dismantle trafficking networks, safeguard the dignity of its citizens, and fulfill its constitutional and international obligations to uphold human rights.

¹⁵ UNODC Global Report on Trafficking in Persons, 2016.

¹⁶ Trafficking and the Law: Experiences from South Asia, Economic and Political Weekly, Vol. 39, 2004.

¹⁷ Orchard, Sex Work in South Asia: The Human Rights Context, 2007.

¹⁸ Journal of the Indian Law Institute, Vol. 58, 2016.

In light of the persistence of human trafficking in India despite existing legal and institutional frameworks, it is essential to propose comprehensive and practical recommendations that address structural gaps, socio-economic vulnerabilities, and enforcement deficiencies. Scholars emphasize that a holistic response requires collabouration between government agencies, civil society, international organizations, and local communities. The following recommendations provide a multi-pronged strategy that combines law enforcement, victim rehabilitation, technological innovation, community engagement, and transnational cooperation.

A primary recommendation is the strengthening of law enforcement. While India has enacted multiple laws criminalizing trafficking, their implementation is often inconsistent due to inadequate training, corruption, and lack of specialized units. Police and prosecutors require continuous capacity-building programs to identify trafficking cases, handle victims sensitively, and gather admissible evidence. The establishment of specialized Anti-Human Trafficking Units (AHTUs) in all districts, adequately funded and staffed, is critical. Srivastava notes that without resources and accountability mechanisms, even the most progressive laws remain symbolic. ¹⁹ Therefore, ensuring adequate funding, clear lines of accountability, and performance-based monitoring of enforcement agencies is essential for deterrence.

Alongside enforcement, enhanced victim rehabilitation must be prioritized. Victims of trafficking face severe physical, emotional, and psychological trauma that requires long-term and holistic support. Rehabilitation programs should provide not only shelter and food but also psychological counseling, skill development, and sustainable livelihood opportunities. Current schemes such as Ujjawala and Swadhar Greh need to be expanded and better monitored to ensure quality service delivery. Research shows that survivors who receive vocational training and economic support are less likely to be re-trafficked.²⁰ Furthermore, rehabilitation must be survivor-centric, respecting the dignity, choices, and autonomy of victims rather than imposing institutionalization.

Another crucial dimension is community participation. Trafficking often occurs in rural and marginalized communities where poverty, lack of education, and social exclusion are prevalent. Empowering these communities to act as the first line of defense against trafficking can be highly effective. Panchayati Raj institutions, women's self-help groups, and local youth organizations can be mobilized to monitor suspicious activities, report recruitment agents, and raise awareness about deceptive practices. Case studies from states like Andhra Pradesh and Telangana reveal that community vigilance committees have successfully prevented trafficking by intercepting suspicious movements and offering support to at-risk families.²¹ Such bottom-up approaches ensure that anti-trafficking measures are culturally rooted and sustainable.

In the digital era, technology integration has become indispensable. Traffickers increasingly use digital platforms for recruitment, transportation, and exploitation, making it essential for enforcement agencies to leverage technological tools. Artificial intelligence and big data analytics can help identify trafficking hotspots, detect suspicious online advertisements, and predict recruitment patterns. Blockchain technology can be employed to ensure transparency in supply chains, preventing the use of trafficked labour in manufacturing and services. Biometric databases can also assist in tracking missing persons and verifying identities across borders. However, the use of technology must be coupled with strong data protection measures to safeguard the privacy of victims.

Given India's geographical vulnerability, cross-border cooperation with neighboring countries is essential. Victims are frequently trafficked into India from Nepal, Bangladesh, and Myanmar, while India also serves as a transit country for trafficking towards the Gulf and Southeast Asia. Bilateral treaties and memorandums of understanding need to be strengthened to ensure rapid victim rescue, repatriation, and reintegration. Existing frameworks such as the SAARC Convention on Trafficking require greater operationalization through joint border task forces, information-sharing platforms, and harmonization of legal standards. Banerjee has emphasized that trafficking is a transnational crime that cannot be effectively addressed without regional solidarity.²³ Enhanced cooperation would not only facilitate victim protection but also disrupt organized crime networks operating across borders.

Preventive measures must also include educational campaigns to raise awareness in vulnerable regions. Many victims fall prey to traffickers because they are unaware of the risks associated with deceptive job offers or marriage proposals. Awareness programs in rural schools, community centers, and migrant-prone areas can play a crucial role in

¹⁹ Human Trafficking in South Asia, Routledge, 2010.

²⁰ Orchard, Sex Work in South Asia: The Human Rights Context, 2007.

²¹ Pati and Panigrahi, Human Trafficking in South Asia, 2010.

²² Chaudhary, "Cyber Trafficking in India: Emerging Challenges," Indian Journal of Criminology, Vol. 47, 2019.

²³ Trafficking and the Law: Experiences from South Asia, Economic and Political Weekly, Vol. 39, 2004.

prevention. UNICEF's studies on child protection demonstrate that awareness drives significantly reduce susceptibility to trafficking, particularly when coupled with economic empowerment initiatives.²⁴ Education campaigns must be tailored to local languages and cultural contexts to maximize their reach and effectiveness.

Another recommendation is to ensure corporate accountability in curbing labour trafficking. With globalization, supply chains often rely on informal labour, where trafficking victims are hidden. Companies must be legally mandated to conduct due diligence to ensure their supply chains are free of forced or trafficked labour. International models such as the UK's Modern Slavery Act, 2015 demonstrate how mandatory corporate reporting can promote transparency. In India, a similar framework could compel corporations to audit labour practices, especially in industries such as textiles, construction, and agriculture. Scholars argue that without holding corporations accountable, demand-driven trafficking in labour sectors will persist.²⁵

Finally, judicial reform through fast-track courts is vital to address judicial delays. Trafficking cases often languish in courts for years, discouraging victims from pursuing justice. The establishment of specialized fast-track courts for trafficking cases would expedite trials, improve conviction rates, and restore confidence in the justice system. Jha points out that delays in trafficking prosecutions contribute significantly to impunity for traffickers. ²⁶ Swift trials, coupled with witness protection programs, would enhance the credibility of the legal system and deter offenders.

²⁴ UNICEF, Child Protection in Emergencies Report, 2005.

²⁵ Kara, Modern Slavery: A Global Perspective, 2017.

²⁶ Trafficking and Criminal Justice in India, Indian Journal of Criminology, Vol. 47, 2019.