



“Unveiling The Crisis: Gender-Based Violence Against Women in Tea Estates with Special Reference to The State of Assam”

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ABSTRACT

Women is a term that rejoice beauty, intelligence, sacrifice and devotion towards her family, society, and the nation. The testimony followed by history however, depicts a different picture of discrimination, exploitation, and harassment against women since ages. The recent trends in the evolution of ‘labour history’ in the academic field have injected new direction into the theories of Gender. In contemporary times, plantation societies are receiving critical as well as special attention as historians embark on gendered reappraisals of history that treat women as commodity and her biological appearance has become a curse to her, leading her towards dehumanization of womanhood. Women, on the other hand suffer this biasness of gender inequality, forced labour, false promises, prostitution, unwanted deception, and abuse without justifying her existence. This paper highlights the connections between oppressed and sexualized bodies of tea plantation workers and the hypocrisy of capitalist patriarchy in Assam. Even after accounting for more than fifty percent of the total workforce of the tea plantation industry in Assam, women workers remain marginalized in many aspects. This study attempts to analyse the current status of tea industry in Assam against the backdrop of sexual division of labour, role of patriarchy, trade unions, sexual abuses, and subordination of women in tea estates. Besides the prevailing power dynamics in the family structure among the genders, the working world has also been dominated by unequal power dynamics that endanger women's safety and security. This paper is an effort to uncover the frightful notions of sexual harassment of women which grossly violates women's rights and dignity.

keywords: Gender, Sexual harassment, Discrimination, Rights, Tea Industry

Introduction:

Historically, women's roles have been confined to domestic spheres and household duties globally. Their contributions within the family have often been overlooked. In many traditional societies, women have been responsible for managing the household, caring for their husbands, and raising children. Some prominent thinkers, interpreting patriarchal family structures as divinely sanctioned, argued that women were naturally suited for subordinate roles in society. For example, Aristotle asserted that the relationship between men and women is inherently one of superiority and subordination.

Although changes in production methods have altered social structures and promoted democratization, the status of women in modern India remains complex. Constitutionally, women have equal status and roles, yet they continue to face discrimination and harassment both at home and in public. Despite these challenges, women persist in striving to improve their status and defy the traditional roles imposed by a patriarchal society. In addition to gender disparities within family dynamics, the workplace also reflects unequal power structures that threaten women's safety and security. Women often encounter new forms of violence, gender discrimination, and harassment in their jobs, with sexual harassment being particularly egregious, violating women's rights and dignity. Sexual harassment in the workplace is widespread and recognized as one of the most severe forms of violence globally.

Women workers are crucial to the tea industry, yet they are often relegated to the lowest levels and seen merely as a cheap and abundant labour force rather than skilled workers. The tea plantation sector, a major part of

agriculture with industrial characteristics, relies heavily on manual labor and has low technological advancement. With a history spanning over 160 years, the tea industry is one of the oldest organized industries in India and is the largest organized employer of women, likely contributing to a better national sex ratio in organized employment. Various factors, including education, training, health, and cultural and social issues, create barriers to women's equitable participation in development.¹

The changes in the production process led to alterations in the social structure, which facilitated democratization². Nonetheless, the status of women is a type of mystery in modern India. On the one hand, as established by the Constitution, she has gained equal status and roles in society, and, on the other hand, in the family and outside the family, she is constantly being discriminated and harassed. Despite their difficulties, women are continually striving to improve their status breaching the stereotyped role assigned to them by the patriarchal society.³

However, besides the prevailing power dynamics in the family structure among the genders, the working world has also been dominated by unequal power dynamics that endangered women's safety and security. In their workplace, they used to confront new forms of violence, gender discrimination, and harassment. Amidst numerous forms of harassment against working women, sexual harassment is frightful, which grossly violates women's rights and dignity. Sexual harassment of women in the workplace (SHWWP) has been ubiquitous, and it is considered one of the most frightening forms of violence globally.

Women workers are an asset and backbone of the tea industry, and despite their contributions women workers have always been relegated to the bottom strata and considered the most abundant and cheapest labour force rather than as a source of specialised labour. Plantation is a part of the agricultural sector but has many features in common with the industry. The plantation industry differs from other industries due to its socio-economic formation characterised by heavy dependence on manual labour and low levels of technology. The tea industry is one of the oldest organised industries in India having a long history of more than 160 years. Plantation sector is the largest organised employer of women workers and is most likely responsible for increasing the national average sex ratio in organised employment.⁴ The entire spectrum of elements, which acts as a barrier to the equitable participation of women in development, ranges from education, training, health, cultural and social considerations.

Objectives:

1. To analyse the gender relations existing in the tea estates, rigid sexual division of labour at workplace as well as at home.
2. To analyse the participation of women in the workforce and the impact on their socio-economic life.
3. To examine the ways in which women workers are marginalised on multiple fronts like casualisation of the workforce, upward occupational mobility, and political space of trade unions.

Methodology:

This paper is based on both primary and secondary data collected from a variety of sources. The primary information was gathered from various Govt. reports and Acts. The empirical study was taken in the Barpani tea estate located in Nagaon, Assam. As far as secondary sources are concerned, they have been collected from a variety of research papers, journals, and books. The research tool used to analyse data obtained from various sources for the current study is content analysis. Furthermore, this study applies descriptive research method.

Conceptual Understanding as discussed under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

*Workplace:

Generally, workplace refers to places of employment and where someone works for their employer. A workplace is defined as "any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer for undertaking such a journey."⁵ As per the Act, workplaces include both organized and unorganized sectors of employment. Workplace includes all the government organizations, private organizations, venture, society, trust, NGO's, a dwelling place, or house.

¹ Jowett, B., *The Politics of Aristotle* (trans.). Oxford, Clarendon Press. 1885.

² Ramaswamy, S., *Women in political thought: The quest for gender equality and beyond*. Orient Blackswan., 2018, 5.

³ Mahapatra, A., *Gender equality and ancient Indian culture: A study*. International Journal of Humanities and Social Science Invention, 7 (8), 22-26. 2018.

⁴ Joshi, H. *Prospects and Case for Employment of Women in Indian Cities*, Economic and Political Weekly, 11(31/33), 1303+1305+1307-1308, 1976

⁵ Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

***Aggrieved woman:**

The aggrieved women are considered as all women whether engaged directly or through an agent including a contractor, with or without the knowledge of the principal employer. They may be working for remuneration, on a voluntary basis or otherwise. Their terms of employment can be express or implied. Further, she could be a co-worker, a contract worker, probationer, trainee, apprentice, or called by any other such name.

***Workplace Sexual Harassment:** It is generally accepted that sexual harassment includes two types of behaviour. The first is usually defined as “quid pro quo” and relates to where individual, often in a position in power, will explicitly or implicitly make sexual requests and/or advances. In exchange they may offer some desired compensation, for example promotion. The second is sexual harassment which can be defined as “hostile environment”, which refers to sex related behaviours which make the person being harassed feel uncomfortable, thereby creating an intimidating working environment⁶. In a landmark judgment, *Vishaka vs. State of Rajasthan*⁷ The Supreme Court defined sexual harassment as any unwelcome, sexually determined physical, verbal, or non-verbal conduct.

According to Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, “Sexual Harassment includes anyone or more of the following unwelcome acts or behaviour (whether directly or by implication), namely:

1. Physical contact or advances;
2. A demand or request for sexual favours;
3. Making sexually coloured remarks;
4. Showing pornography's
5. Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.”

Thus, sexual harassment is a serious offence as it violates women's right to equality and dignity. The Sexual Harassment Act, 2013 thus, is remarkable bedrock to protect women's respect in workplace and to ensure safe working spaces for them. Successful enforcement of the Act would lead to the realisation of their right to equality between men and women, life and liberty, and equality in working conditions everywhere. The sense of safety at work will improve the participation of women in work, resulting in their economic empowerment and inclusive growth.

Tea Plantation Industry and women workforce:

Assam, one of the eight Northeastern states situated south of the Eastern Himalayas is traditionally an agrarian society. Despite its rich natural resources and culture, the state is lagging the rest of the country. The state is inhabited by multicultural, linguistic-religious ethnic groups of people. The region is industrially less developed with comparison to most of the states of India.

Women's workforce participation in the formal sector is also comparatively lower. The state's female literacy rate is 67.27, which is above India's average female literacy rate of 65.46.⁸ NSO survey (2017) again shows that the Assam literacy rate for women is 81.2 per cent while that of India is 70.3 per cent. The State of Indian Women: Report 2001-02 released by the Union Ministry of Human Resource Development revealed that the crime rate in the state against women is higher than the all-India average. According to National Crime Records Bureau (NCRB), Assam recorded the highest rate of total crimes against women in 2017. According to a report of the National Crime Records Bureau (NCRB), 2019, Assam has topped the chart of crime against women in the country for the third consecutive year. In a report published in 2020 by National Crime Records Bureau (NCRB) reveals that Assam has the highest crime rate against women, which is about three times more than the national figure. Thus, the status of women is paradoxical in the state. At one hand the female literacy rate is higher than the national female literacy rate in the state; on the other hand, the crime rate against women is more than that of the national figure. It is difficult to find data on women in the state workforce. An unpublished survey conducted by NEN (North East Network) in 2017 found that in organised sectors like the tea industry, where women constitute more than 50% of the workforce, they suffer from multiple layers of discrimination within the exploitative power structures of the industry. Sexual harassment of women is reported to be rampant in the tea estates of Assam⁹.

With the increase in women participating in the workforce, sexual harassment of women in workspaces has become increasingly prevalent in the state. The sexual harassment in the workplace in Assam has not yet been extensively studied. One of the reasons of sexual harassment in workplace was the prevailing male privilege, existing social pressure on women etc. The workplaces of Assam, reveal the rampant presence of 'quid pro

⁶ Smalensky, E., and Kleiner, B. H. (2003) 'How to prevent sexual harassment in the workplace'. Equal Opportunities International, 18 (2/3/4), 3-7

⁷ 1997

⁸ Census 2011

⁹ Workplace Safety and Dignity for Women in Assam, 2019

quo.¹⁰ According to the Assam Human Development Report, 2014, the Gender Inequality Index is 0.375, suggesting that the existing gender disparity ensures that the state faces an approximate loss of 37 percent of potential human development, leading to high social and economic costs such as adverse sex ratio, high maternal and infant mortality rate, increased health problems, unemployment, etc. Gender inequality in the spheres of education, health, employment, wage, labour force participation and other development indicators is leading to a growth slowdown in Assam.

Employment patterns of the tea gardens of Assam clearly reflect a sexual division of labour that gives men and women different roles in relation to the family and domestic organization. The process of migration of the Adivasi community since the colonial era into the plantations was based on factors of pull and push. They were lured into the region.

Sexual Harassment of Women at Workplace and tea gardens of Assam

The tea plantation industry in Assam is mostly entrusted with set of work mostly plucking and pruning which are tagged as requiring feminine attributes and skills; thus, establishing gendered division of work in the tea plantation sector. Patriarchal dominance is seen in the plantation industry. The '**planter- manager- sahib**' symbol is clearly visible among the plantation workers. Discrimination in pay between the male and the female tea plantation workers was prevalent for a long duration of time. Women face various kinds of harassment at work and in the labour lines. Their issues are hardly dealt with by the members of the trade unions or the 'line supervisors'. The unions play a less significant role in seeking justice for the women workers when there is violation of their rights or in cases of abuses. Generations of oppression have almost brought about an acceptance of the gendered injustices prevalent in the plantation industry. There are huge numbers of casual and permanent women workers in this sector with false assurances of good pay and better living conditions. To understand class in the tea industry in Assam, it is important to understand the gender relations existing in this sector of work.

Different forms of gender-based discriminations and violence are evident in the form of child marriage, trafficking and maternal mortality amongst the tea garden women workers in Assam. Assam, also has highest maternal mortality and informal mortality rates in India.¹¹ It relates to anaemia, malnutrition, young pregnancies, lack of adequate healthcare and is an indicator of gender inequalities present within communities.¹² The tea industry has categorised job for women workers like plucking, pruning, hoeing etc. There are very few women in the management and decision-making processes within the tea industry. Women workers are absent in the negotiation and decision-making tables of the workers union.

Vulnerability of Women Tea Garden Workers

- It is a known fact that the trafficking of women and girls from tea-tribal community is rampant.
- These women and girls are often uneducated and unaware about their rights. They are mostly engaged as daily wage workers, with little or no access to job security and social security and their superiors or managers are mostly men.
- While these women are already disadvantaged by their deplorable socio-economic conditions, their lack of awareness puts them at a great risk of sexual harassment at workplace.
- They have absolutely no power or negotiation capacity in a situation of violence. Their vulnerability is also exacerbated due to their marginalized status within their homes.
- Most of them do not enjoy control over their incomes, have no right over hereditary property and are physically and mentally exploited by their husbands, family members and estate managers.

The researcher closely studied five women tea garden workers at Barpani Tea Estate, who had experienced sexual harassment at workplace. Through these five case studies, the **study brought out the following experiences of sexual harassment at workplace of women tea garden workers:**

- **Non-verbal Forms of Sexual Harassment at Workplace:** The women tea garden workers were often sexually harassed on the way to their workplace, which included stalking, lewd comments, songs, and repeated requests for sexual favours. In one instance, the harasser constantly stopped the woman on her way to and way back from work and would force her to speak to him. In fact, one day the harasser also reached her home.
- **Physical Forms of Sexual Harassment at Workplace:** If not sexually harassed on the way to work, they were subjected to physical forms of sexual harassment at the workplace. These included unwanted physical touch and physical proximity. It is important to recognize and include the broader place of economic activities

¹⁰ Ministry of Women and Child Development, *Handbook on sexual harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Government of India.*,2015

¹¹ Bhat, R. A., & Deshpande, A. *An overview of sexual harassment of women at workplace in India: An analytical study*, International Journal of Innovative Research in Science, Engineering and Technology, 6(7), 14361-14369.

¹² Sexual Harassment of Women Tea Garden Workers: *Case Study in Barpani Tea Estate*, Assam Key Findings from the Study Conducted by Simanta Mazumdar, MFF-NAPSWI, 2016

in any effort to prevent and address sexual harassment at workplace. workplace, making the worker uncomfortable. Often, on the pretext of helping the worker, the harasser would try to come close to her and touch her 'incidentally.' In another instance, the Sardar/Supervisor would keep a place reserved for the worker at the lunch time or at the time of plucking leaves and force her to occupy that place. He would also ensure that she is surrounded by other male workers at that time so that he can easily bully her.

• **Quid Pro Quo:** The repeated physical and non-verbal forms of sexual harassment were also accompanied by repeated requests for sexual favours, in lieu of better salaries, and jobs. While none of the women workers interviewed yielded to these situations of Quid Pro Quo, they felt extremely pressurized and scared when these requests were being made. They feared loss of livelihood or being vilified by the harasser and his cronies for denying the request, leading to stigmatization and ostracizations from the community.

• **Visual Forms of Sexual Harassment at Workplace:** It was also discovered that mobile phones were used to perpetuate sexual harassment at workplace. In one instance, the Assistant Manager of the tea estate would send a boy to the victim's place with a mobile phone and force her to speak to him on the phone.

Working conditions and labour benefits under plantation industry

- **Employment status and tasks:** Most of the tea plantation workers are engaged as permanent workers and others are casual, daily, or seasonal workers. Most workers in the latter three types of employment claim they are not entitled to receive access to the same rations, shelter, and health facilities as permanent workers. There is no job hierarchy among tea plantation workers. Most of their employment is dependent on the wish of the manager. The recruitment process for workers is carried out by the tea plantation authority mostly in an informal manner.
- **Wages:** The cash remuneration of tea plantation workers is calculated weekly based on daily performance. Most of the employees opined that they get remuneration weekly. Their work is mainly target based and remuneration depends upon performance.
- **Housing:** Every tea plantation is required to provide cost free accommodation for permanent workers. Most of the tea plantation workers are living under the arrangement of tea estate authority. But they are not satisfied with the size, quality, design, and other facilities like sanitation and drinking water provided by the authority. The ventilation facility is insufficient and sanitation facilities are also very poor. Although water options should be arranged by the tea garden authority, an insufficient number of water options were found to be installed.
- **Working hours and leave:** Tea plantation workers usually work six days a week and are not entitled to receive wages for the weekend. The working hours are fixed at eight hours per day starting at 9 am. During peak months most workers must work additional hours or seven days a week. They usually do it willingly as additional income comes from those additional hours. The management of the tea industry, however, claim that workers do not work sincerely, usually work less than their fixed eight hours, and are engaged in other activities outside the tea plantation. Leave is generally allowed but few workers enjoy casual leave due to lack of knowledge about the provisions of leave.
- **Maternity protection and child care:** Female workers are entitled to maternity leave with their daily wages for their first two pregnancies. They were found to have poor access to other services including medical visits and special allowances during pregnancy. The employers do not impose laborious work during pregnancy. There is no provision of paternity leave in the tea industry. Despite requirements to establish a childcare facility in each tea plantation, only a few plantations were found where a facility was introduced by the tea garden management
- **Malnutrition:** It has also been identified as a significant problem for women and children on the plantations.
- **Working environment, occupational safety, and health:** In the tea plantation sector, workers' safety and security issues are ignored widely. They identified multiple reasons including having no shelter close to the workplace, no safety kits, no toilet facility, long working hours in a harsh environment, risk of snake bites and poisonous chemicals. The harsh environment of the factory causes health hazards. Injuries are also a common problem among both tea garden and factory workers. Fatigue and job stress are also experienced by tea plantation workers. It was hard to find toilets and urinal facilities in the study area tea garden locations.
- **Social Status of Tea Tribal Women** is very poor. They do not enjoy any privilege in comparison to men in their workplace. They cannot be involved in decision making process both at office and house. Other than that physical abuse, mental torture, unprecedented hard work, family responsibilities make them to suffer to a great extent.

Findings of the study:

Generally, the women workers are not ready to accept the instances of sexual harassment at any forms. There is lack of gender sensitisation programmes for employers and workers in the workplaces. The research provides a remarkable finding that 90% women do not know about the procedures for officially lodging a complaint. The report has shown that, over 55 percent of women did not share the sexual harassment at the workplace with their colleagues and supervisor citing mental pressure as the major reason for this. The

aggrieved women feel disempowered to complain and they believe that perpetrators who have financial means can evade justice. The most common forms of reactions given by women under tea industry are:

- **Non reporting:** Due to fear and stigma, most of the women do not report or share the violence of sexual harassment faced by them. Moreover, the workplaces do not have favourable environments for the women to freely and fearlessly share and report instances of violation.
- **Employers attitude:** Another finding in this study states that the employers do not support the victims to lodge complaint or to go against the system as they desire to preserve the reputation of the organization.
- **Confrontation:** The female employees do not have the courage to confront their perpetrators at the time of the harassment and complained to their supervisor. The reasons for not sharing the cases were due to the losing one's dignity, losing of jobs, or facing others forms of hostile working environment
- **Seek support from Husbands and Community:** In two instances, the victims reported that they were severely beaten by their husbands when they informed them about the incident. A victim was wounded by her husband with a knife and had to undergo several stitches. Also, their communities did not come out in support of them and asked them to ignore the incident and resume their work at the tea garden. The violence was normalized and touted as an everyday part of a working woman's life.
- **Stop Going to Work:** In two cases, the women stopped going to work. In fact, in one of these cases, the victim's daughter also stopped working in the tea garden for the fear of retribution and stigmatization. Some of them rejoined work after the perpetrator left his job at the tea garden.
- **Keeping Distance from the Perpetrator:** The victims also coped with the situation by keeping distance from the perpetrator or by avoiding him.
- **Seek support from Supervisor:** Only in one case study, the victim was supported by her supervisor, who reprimanded the perpetrator and warned him to not disturb any female co-worker in the future.

Suggestions

- **Awareness about the Law:** All the victims and employers were found to be unaware about Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The Barpani Tea Estate employed a total of 450 workers; the law mandates any workplace with more than 10 employees to constitute an Internal Committee (IC) to ensure prevention and redressal of sexual harassment at workplace. The said Tea Estate had no such mechanism in place and therefore, was extremely lacking in providing the necessary institutional support to any of its women workers, who were facing sexual harassment at workplace or were vulnerable to it.
- **Guidelines given by SH Act:** It mandates employers to set up complaint mechanisms, establish Internal Committee display information about the Act to prevent sexual harassment of women at workplaces. Members of ICs must be aware of the gendered nature of sexual harassment at workplace and their impact on women if they are committed to rendering justice and preventing sexual harassment of women. The concerned authority needs to fulfil their duty in true sense.
- **Correction of biased attitude towards the complainant:** Every woman suffers the fear of facing biased attitude in case they complain against such perpetrators. It is the first barrier and as a result offenders enjoy impunity. Women are socialised to keep silent about incidents of sexual harassment to protect the so-called honour of family, workplace, employer, and the aggrieved woman herself. Those who raise their voices are vilified and subjected to further harassment in the highly masculine work environments. The study reveals that there is a general level of tolerance and normalization of sexual harassment of women in workplaces.
- **The role of the state:** It is pivotal in the prevention of SH and redress. The study claimed that government officials were either ignorant or showed a lackadaisical attitude towards the mandate of the Act. The nodal agency for the SH Act in the state, the Social Welfare Department (SWD), suffers from a lack of clarity about its own
- **Role as a monitoring mechanism:** The nodal agency is also mandated to form Local Committees (LCs) at the district level but these are far from fully achieved in Assam. Hence, as the study shows, the monitoring mechanism in the state is in poor shape.
- **The role of the employer:** The employer has to take equal responsibility if he finds any such instances at his premises. Reputation of the organisation should not be entertained to that extent where the employee cannot seek justice at his end. Mental support to the employee along with institutional support should be provided by the employer along with necessary awareness.

Conclusion:

Women play a significant role in the country's development through their economic support, domestic activities and through their emotional attributes. They however need a secure and safe workplace. Besides the presence of several social, legal, and constitutional legislations this social evil is highly increasing day by day. The tea gardens women workers need to make aware of their rights and privileges as given by constitution of India that causing sexual harassment results in violation of the fundamental rights of women especially right to equality under article 14 & 15 and her right to life and to live with dignity under article 21 of the constitution. However,

it is lamentable to say that along with the increase rate of women workforce participation the sexual harassment of women at the workplace has also been increasing with time. Workplace sexual harassment affects the social and psychological behaviour of the women within and outside their workplace, and hinders the productive outcome of them. To curb sexual harassment instances at the workplace along with the government, the employers and the employees must be aware of sexual harassment and its implications.

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