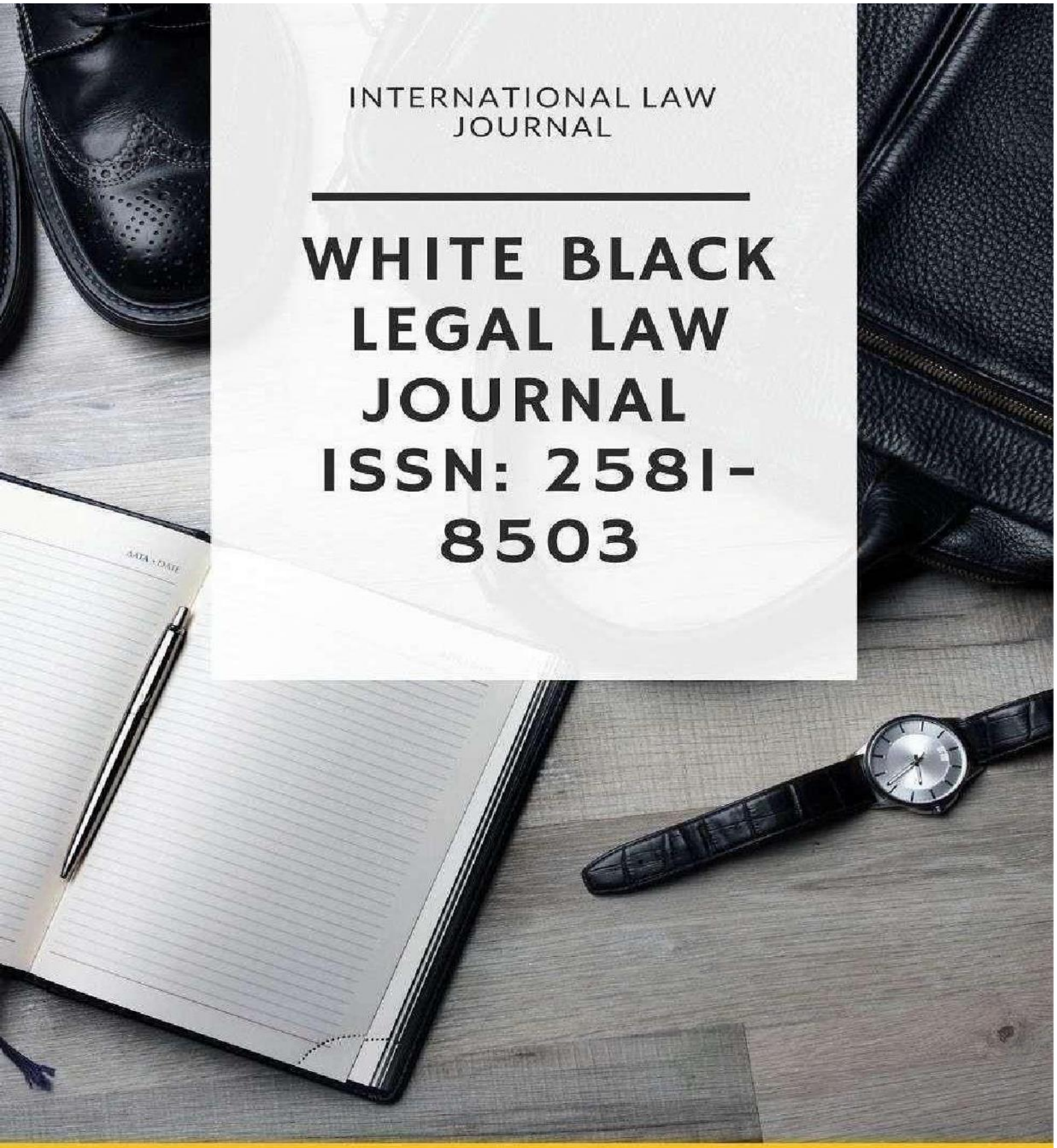


INTERNATIONAL LAW JOURNAL

WHITE BLACK LEGAL LAW JOURNAL

ISSN: 2581-8503

Peer - Reviewed & Refereed Journal

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

DISCLAIMER

No part of this publication may be reproduced, stored, transmitted, translated, or distributed in any form or by any means—whether electronic, mechanical, photocopying, recording, scanning, or otherwise—without the prior written permission of the Editor-in-Chief of *White Black Legal – The Law Journal*.

All copyrights in the articles published in this journal vest with *White Black Legal – The Law Journal*, unless otherwise expressly stated. Authors are solely responsible for the originality, authenticity, accuracy, and legality of the content submitted and published.

The views, opinions, interpretations, and conclusions expressed in the articles are exclusively those of the respective authors. They do not represent or reflect the views of the Editorial Board, Editors, Reviewers, Advisors, Publisher, or Management of *White Black Legal*.

While reasonable efforts are made to ensure academic quality and accuracy through editorial and peer-review processes, *White Black Legal* makes no representations or warranties, express or implied, regarding the completeness, accuracy, reliability, or suitability of the content published. The journal shall not be liable for any errors, omissions, inaccuracies, or consequences arising from the use, interpretation, or reliance upon the information contained in this publication.

The content published in this journal is intended solely for academic and informational purposes and shall not be construed as legal advice, professional advice, or legal opinion. *White Black Legal* expressly disclaims all liability for any loss, damage, claim, or legal consequence arising directly or indirectly from the use of any material published herein.

ABOUT WHITE BLACK LEGAL

White Black Legal – The Law Journal is an open-access, peer-reviewed, and refereed legal journal established to provide a scholarly platform for the examination and discussion of contemporary legal issues. The journal is dedicated to encouraging rigorous legal research, critical analysis, and informed academic discourse across diverse fields of law.

The journal invites contributions from law students, researchers, academicians, legal practitioners, and policy scholars. By facilitating engagement between emerging scholars and experienced legal professionals, *White Black Legal* seeks to bridge theoretical legal research with practical, institutional, and societal perspectives.

In a rapidly evolving social, economic, and technological environment, the journal endeavours to examine the changing role of law and its impact on governance, justice systems, and society. *White Black Legal* remains committed to academic integrity, ethical research practices, and the dissemination of accessible legal scholarship to a global readership.

WHITE BLACK LEGAL

AIM & SCOPE

The aim of *White Black Legal – The Law Journal* is to promote excellence in legal research and to provide a credible academic forum for the analysis, discussion, and advancement of contemporary legal issues. The journal encourages original, analytical, and well-researched contributions that add substantive value to legal scholarship.

The journal publishes scholarly works examining doctrinal, theoretical, empirical, and interdisciplinary perspectives of law. Submissions are welcomed from academicians, legal professionals, researchers, scholars, and students who demonstrate intellectual rigour, analytical clarity, and relevance to current legal and policy developments.

The scope of the journal includes, but is not limited to:

- Constitutional and Administrative Law
- Criminal Law and Criminal Justice
- Corporate, Commercial, and Business Laws
- Intellectual Property and Technology Law
- International Law and Human Rights
- Environmental and Sustainable Development Law
- Cyber Law, Artificial Intelligence, and Emerging Technologies
- Family Law, Labour Law, and Social Justice Studies

The journal accepts original research articles, case comments, legislative and policy analyses, book reviews, and interdisciplinary studies addressing legal issues at national and international levels. All submissions are subject to a rigorous double-blind peer-review process to ensure academic quality, originality, and relevance.

Through its publications, *White Black Legal – The Law Journal* seeks to foster critical legal thinking and contribute to the development of law as an instrument of justice, governance, and social progress, while expressly disclaiming responsibility for the application or misuse of published content.

THE STANDARD OF UNWELCOME CONDUCT AND THE VIRTUAL WORKPLACE UNDER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE ACT, 2013

AUTHORED BY - AISHWARYA S

ABSTRACT

This paper examines whether the "unwelcome conduct" standard in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 can sufficiently protect women against covert harassment or harassment through technological mediums. This paper demonstrates that while the language of the Act is broad enough to cover both, the law does not provide any criteria for determining unwelcomeness, nor does it explicitly include virtual workplaces. The protection, therefore, hinges on the subjective interpretation of each of the Internal Committees and the courts, which results in inconsistency. Through doctrinal analysis, comparison with other nations such as the United Kingdom and the United States, and brief hypothetical examples, the paper argues that the solution does not lie in enacting a new law but in rules, guidelines and training, and a balancing of an impact-based standard with the procedure for the respondent, as directed by the Supreme Court in Aureliano Fernandes v. State of Goa.

Keywords: POSH Act; unwelcome conduct; hostile work environment; virtual workplace; Internal Committee.

1. INTRODUCTION

Workplace harassment seldom announces itself. Consider the following scenario.

> **Illustration 1.** A team lead repeatedly urges a colleague, who has said her home is untidy, to switch on her camera during a team call. When she does, he asks whether she has put on weight and tells her to stand up and turn around. The other participants say nothing.[1]

No one assaulted her, threatened her, or even used any explicit language. However, every such

[1] The illustrations in this paper are hypotheticals constructed by the author, adapted from scenarios in an employer-run workplace awareness module. They are analytical devices, not reported cases or evidence.

instance poses the same problem, which the POSH Act has not answered conclusively[2]. First, is the assessment of unwelcomeness based on the experience of the complainant or the intention of the speaker? Second, is the comment regarding someone's body part a "comment of sexual nature?" Third, can a video call be considered "workplace?"

The question therefore raised is: Does the definition of "unwelcome conduct" provided under the POSH Act, through the interpretation of Internal Committees and the judiciary, provide sufficient protection for covert and technology mediated harassment in virtual and hybrid workplaces? The argument is that the terminology used under the Act is sufficiently broad to include even subtle and online harassment but lacks an express criterion on determining "unwelcomeness" as well as any express mention of virtual workplace. The adequate protection will thus depend on the interpretation placed on the law by each Internal Committee.

The method is primarily doctrinal, drawing on the bare Act, Supreme Court decisions and recent High Court rulings, supplemented by comparison with the United Kingdom and the United States, which have stated their standards more explicitly. Short hypotheticals, labelled as such, test how the provisions operate on facts. The paper is confined to India and to the women-only framework of the Act; it does not assess the case for a gender-neutral statute.

2. THE LEGAL FRAMEWORK

There is a judicial history to the Act. In the case of Vishaka v. State of Rajasthan, the Supreme Court, in the absence of legislation, had formulated a right to work environment free of sexual harassment under Article 14, 15, 19(1)(g), and 21 of the Constitution and international norms of non-discrimination against women and issued certain guidelines.[3] These guidelines defined sexual harassment as being "unwelcome sexually determined behaviour (whether directly or by implication)", which includes, but not limited to, physical contact and advances; a demand or request for sexual favors; sexually coloured remarks; showing pornography; and any other unwelcome physical, verbal or non-verbal conduct of sexual nature.[4]"

Two additional cases would affect the terminology used in the definition of the offense. First, in Rupan Deol Bajaj v. K.P.S. Gill, the Court evaluated outrage of modesty on whether the act would shock the decency of a woman, an essentially objective standard based upon the nature of the act and not its intention.[5] In Chopra, the Court refused the argument that absence of

[2] Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, No. 14, Acts of Parliament, 2013 (India) [hereinafter POSH Act].
[3] Vishaka v. State of Rajasthan, (1997) 6 S.C.C. 241 (India).
[4] The guideline is reproduced in Apparel Export Promotion Council v. A.K. Chopra, (1999) 1 S.C.C. 759 (India)
[5] Rupan Deol Bajaj v. K.P.S. Gill, (1995) 6 S.C.C. 194 (India).

physical contact meant that there was no basis for dismissal, stating that "Any action or gesture, whether directly or by implication, aims at or has the tendency to outrage the modesty of a female employee, must fall under the general concept of the definition of sexual harassment.[6]" In Medha Kotwal Lele v. Union of India, the Court continued to oversee enforcement of the guidelines as legislation awaited.[7]

This was followed by the POSH Act. The preamble of the POSH Act bases the prohibition on Articles 14, 15, 19(1)(g), and 21 of the Constitution and Convention on the Elimination of All Forms of Discrimination against Women.[8] Sexual harassment includes, according to section 2(n), "any one or more of the following unwelcome acts or behavior (whether directly or by implication)" of "physical contact and advances"; "a demand or request for sexual favors"; "making sexually colored remarks"; showing pornography; and "any other unwelcome physical, verbal or non-verbal conduct of sexual nature."[9] Moreover, section 3(2) states that certain conditions, among others, if found in connection with any act or behavior of sexual harassment "may amount to sexual harassment". These conditions include an implied or explicit promise of preferential treatment; a threat of detrimental treatment; a threat regarding employment; interference with work or creation of "an intimidating, offensive or hostile work environment"; and humiliation that is likely to affect the health or safety.[10]

Two characteristics are pertinent to the discussion that follows. First, the Act uses most of the Vishaka list without modification but omits the introductory word "sexually determined" and uses the phrase "of sexual nature" only in the residual clause (v); furthermore, nowhere in the Act is there any definition of "unwelcome.[11]" Second, while section 3(2) may establish independent liability, its circumstances are attached to "any act or behavior of sexual harassment," and thus a hostile-environment claim will always require some base act under section 2(n).

3. IMPACT Vs. INTENT

3.1 Unwelcomeness and the missing test

Section 2(n), since it contains no language of intent, cannot be a defence to a complaint if the respondent argues that it was just a joke or a friendly act. The more difficult question lies in

[6] *Chopra*, (1999) 1 S.C.C. 759.
[7] Medha Kotwal Lele v. Union of India, (2013) 1 S.C.C. 297 (India).
[8] POSH Act preamble
[9] POSH Act § 2(n).
[10] POSH Act § 3(2).
[11] Compare *Chopra*, (1999) 1 S.C.C. 759 (quoting Vishaka guideline 2), with POSH Act § 2(n).

the opposite direction: if intent is not an issue, then whose perception counts? It is the perception of the complainant, as understood through the work of the IC, that counts. The Act gives no indication about what kind of reasonable person's perception should apply here – the complainant's, a reasonable woman, or a reasonable person.

Other systems have an explicit definition. In the UK, according to the Equality Act 2010, harassment involves unwanted conduct connected to a protected characteristic, or of a sexual nature, which has the "purpose or effect" of violating the dignity of the complainant, or of creating an intimidating, hostile, degrading, humiliating or offensive environment. In determining whether the conduct has the effect described above, the court shall consider the perception of the complainant, the circumstances surrounding the alleged incident, and whether the conduct may reasonably be seen as having the effect.[12] In the US, the Supreme Court has ruled that the essence of a claim based on a hostile work environment under Title VII is that the conduct was "unwelcome" and that the environment that was created must be offensive from the standpoint of a reasonable person and actually experienced by the victim as such.[13] Some federal appellate courts took an even further step and developed the notion of a "reasonable woman".[14]

By default, the Indian stance is merely the subjective aspect of this test. It is safe but uncertain: what is considered offensive by one committee can be considered trivial by the next. The important thing is that the Indians need not adopt the "severe or pervasive" standard of the American laws, which is not included in the Act,[15] but that having a published test can decrease inconsistency. This comparison must have an important qualification of current status. Title VII is still in effect; the Equal Employment Opportunity Commission voted 2-1 on January 22, 2026 to withdraw its 2024 guidance on harassment, but this did not amend the law or the case law standards.

3.2 Silence, power and the unvoiced objection

> **Illustration 2.** A senior colleague comments on a junior colleague's appearance in every weekly meeting for four months. She smiles and says nothing because he writes her appraisal. In the fifth month she complains.

[12] Equality Act 2010, c. 15, § 26 (UK).
[13] Meritor Sav. Bank, FSB v. Vinson, 477 U.S. 57, 68 (1986); Harris v. Forklift Sys., Inc., 510 U.S. 17, 21–22 (1993).
[14] Ellison v. Brady, 924 F.2d 872, 878–79 (9th Cir. 1991).
[15] *See Harris*, 510 U.S. at 21 (requiring conduct sufficiently severe or pervasive to alter the conditions of employment).

Neither section 2(n) nor 3(2)(ii) requires objection. Implied threats of detrimental treatment are accepted as circumstances of harassment, under the definition of harassment in 3(2)(ii), which the subordinate might take from the situation where the speaker has control over her performance review.[16] Timeliness is also satisfied. For a series of incidents, the three-month rule starts with the last incident, and the committee has the power to extend that by three months in certain situations.[17] The doctrine lacks a case where the complainant did not protest and where no such protest was required. In Chopra, the case most clearly on point, the court found that the complainant "kept reprimanding" the respondent.[18] It is up to individual committees whether silence in the presence of the more powerful speaker amounts to unwelcomeness. A committee insisting on objection has added a requirement not in the Act.

3.3 The "sexual nature" threshold

> **Illustration 3.** During a team meeting, a manager remarks, "Did you put on weight?", about a female team member. Colleagues laugh. He then asks her to turn around.

The rigid interpretation would be that though the statement about the person being heavy is rude, it is not of sexual nature, and the laughter of the colleagues is immaterial. This interpretation would be open from the wording of section 2(n)(v), and would also get strengthened by the fact that sections 3(2)(iv) and (v), which talk about hostile environment and humiliating treatment, only apply where they are linked to an "act or behavior of sexual harassment". However, purposive interpretation is more correct. A command to a female colleague to get up and turn around amounts to an assessment of her physical appearance before others, which is sexual in nature regardless of the actual use of words. Chopra directs the court to focus on "broad probabilities" of the case and not on the technical aspects or literal meaning of the words,[19] and the Act is based on the right to live with dignity as enshrined under Article 21.[20] There is always a danger of over-inclusion, but there is also protection against over-inclusion in section 14 of the Act.

4. THE VIRTUAL AND HYBRID WORKPLACE

Section 2(o) defines the term "workplace" to mean: any private business or organization engaged in conducting commerce, profession or any activity listed under it; includes any place

[16] POSH Act §§ 2(n), 3(2)(ii).
[17] POSH Act § 9(1) & provisos.
[18] *Chopra*, (1999) 1 S.C.C. 759.
[19] *Chopra*, (1999) 1 S.C.C. 759
[20] POSH Act preamble.

visited by the employee "arising out of or in the course of his employment," even employer-supplied transport; and also includes "a dwelling place or a house".[21] None refer to electronic communication, and the phrase "place visited" does not gel with the concept of a video conference conducted from one's own house. It is geared toward domestic workers, since Section 2(a)(ii), 2(e) and 2(g)(iv).[22]

The better textual context is sub-section (ii): the organisation is the workplace, and conduct between its employees as part of their work falls under it irrespective of the mode of interaction. Courts have started interpreting the provision in this way. In Dr. Amit Kumar v. University of Delhi, the Delhi High Court affirmed an IC's decision that obscene WhatsApp and Facebook Messenger messages sent to students constituted the offence since, inter alia, it was an extension of the professional relationship.[23] This interpretation is purposive, but it is that of a High Court regarding a statute that does not contain the words "online", "virtual" or "remote". A committee in another State is not bound by this interpretation, and an employer framing a policy does not have any statutory text to back him. This is the fundamental virtual-workplace issue in the Act: not that its definition does not cover online conduct, but that it does not say so.

> **Illustration 4.** A manager sends a subordinate voice notes and "good night" messages on WhatsApp from his personal number every night for several weeks, describing them as work check-ins. She works from home and has never met him in person.

According to Dr. Amit Kumar's argument, the point of connection is the reporting relationship, not the medium or time of day. The IC has the power of a civil court to order the discovery and production of documents,[24] and, on her written application, can advise on interim reliefs, including the transfer of one or both the parties or up to three months leave in favor of her.[25] However, what the Act does not deal with is the preservation of digital evidence, particularly the disappearing ones.

5. WHO IS COVERED, AND WHOM CAN THE EMPLOYER REACH?

The protections offered by the Act are expansive in scope. In particular, "aggrieved woman" refers to "a woman of any age whether employed or not",[26] and "employee" includes not only

[21] POSH Act § 2(o).
[22] POSH Act §§ 2(a)(ii), 2(e), 2(g)(iv), 2(o)(vi).
[23] Dr. Amit Kumar v. Univ. of Delhi, W.P.(C) 586/2021 (Del. H.C.) (India).
[24] POSH Act § 11(3)(a)–(b).
[25] POSH Act § 12(1).
[26] POSH Act § 2(a)(i).

contract workers, but also probationers, trainees, apprentices, and volunteers, paid or unpaid, and those employed via agents or contractors.[27] Section 19(a) requires that "every employer shall provide a safe and healthy working environment, which shall include safety from the persons coming into contact at the workplace".[28] The term "respondent" need not refer to the aggrieved's employer, since section 2(m) states simply that he is "the person against whom the complaint is made." However, section 11(1) charges the committee to investigate "in accordance with the provisions of the service rules applicable to the respondent," and section 19(h) is concerned with non-employer perpetrators only in terms of the employer's duty to act under the law.

> **Illustration 5.** A freelance consultant, engaged through an online platform for a client's project, receives repeated suggestive comments during project calls from a mid-level employee of the client. Her contract is with the platform, not the client.

She is an aggrieved woman regardless of being an employee. Her case would be taken up by the IC of the respondent organization, or if the organization has less than ten employees, or the complainant is against the employer.[29] Whether the client has the power to discipline the respondent is dependent upon his service regulations, but the obligation on the part of the platform under section 19(a) to protect her from "persons coming into contact at the workplace" is unclear from the text, especially if the "workplace" is a client's virtual workspace. This issue has been resolved by the UK in recent times through the Employment Rights Act 2025, which has imposed the liability on employers to compensate their workers for third party harassment, except if they have taken all possible measures to prevent it.[30]

6. THE INTERNAL COMMITEE AND PROCEDURAL FAIRNESS

IC is vital for the execution of this Act, where it needs to have senior women as Presiding Officer, at least two members who are employees and are committed to women's cause or social work or have legal knowledge and one member who belongs to the NGO or knows about the matter, with half members being women.[31] The conciliation process can be done only on request by the woman and not based on money;[32] the inquiry process must be done within ninety days, reporting within ten days, and the employer must take action within sixty days.[33]

[27] POSH Act § 2(f).
[28] POSH Act § 19(a).
[29] POSH Act §§ 2(m), 11(1), 19(h).
[30] POSH Act §§ 4(1), 6(1), 9(1).
[31] POSH Act § 4(2).
[32] POSH Act § 10(1).
[33] POSH Act §§ 11(4), 13(1), 13(4).

The complaints are always confidential, and there is a provision of appeal within ninety days.[34] If the employer does not establish the IC, he will be fined with fifty thousand rupees.[35]

The decision in the Supreme Court case of Aureliano Fernandes v. State of Goa is indicative not only of the strengths but also the deficiencies of this legislation. In the case at hand, the investigation took place before the POSH Act, where the committee at Goa University considered seventeen complaints against a lecturer in terms of Central Civil Services rules. In May 2009, according to the Court, there was a breach of procedural rules in that twelve interviews were conducted very quickly, one after another, while the appellant had only a week to prepare for the cross-examination of witnesses.[36] Even if he used questionable grounds regarding his health, the committee should have provided him with a sufficient period of time. The Court set aside his dismissal and ordered a new investigation within three months, [37]stating that "only a fair procedure can guarantee a fair result" and that "the efforts of the Committee of being fair to the victims of sexual harassment have caused more harm to them." [38]

In this case, the Court made use of the matter to deal with enforcement of the Act, as stated by it as "To realise the promise that the PoSH Act offers to working women across the country".[39] The Union and the States were told to ensure within a time period that the committees have been constituted and are constituted in compliance with the Act; make available their composition, contact information, and the online mechanism for filing of complaints; acquaint members with the process of inquiry; and conduct periodic orientation and awareness programs. It was also requested to develop training manuals and SOPs by National Legal Services Authority, State Legal Services Authorities, and Judicial Academies.[40] As per the April 2024 record of the Court, the Union and most States had yet to submit affidavits.[41]

The two lessons learned are: First, the preferred remedies by the Court were verification, publication, training and proper procedures but not new legislation, thus validating the thesis that consistency shall come from institutional capacity and direction. Secondly, the interpretation of the term "unwelcome" should be one based on the impact rather than a presumption against the respondent. The Act itself provides for a hearing of both employees and a copy of the findings,[42] while Section 14 allows taking action against a complainant only

[34] POSH Act §§ 16, 18(2).
[35] POSH Act § 26(1).
[36] Aureliano Fernandes v. State of Goa, [2023] 7 S.C.R. 772, ¶ 71 (India).
[37] *Id.* ¶ 73.
[38] *Id.* ¶ 72.
[39] *Id.* ¶ 77.
[40] *Id.* ¶ 77(i)–(vii).
[41] Order, Aureliano Fernandes v. State of Goa
[42] POSH Act § 11(1) second proviso.

when there is malice or forgery/misleading document after investigation, stating that "mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant under this section".[43] Protection against over-breadth lies in procedure, not in a narrower definition.

7. REFORM: RULES, GUIDANCE AND TRAINING

If the diagnosis is right, the cure is regulatory rather than legislative. Four measures follow.

First, clarify "workplace" by rule. Under Section 29(1), the Central Government is authorized to make rules "for carrying out the provisions of this Act," which can include how to conduct the inquiry.[44] The issuance of a rule or notification that "workplace" means work-related video calls, messaging platforms and teleworking will put the reasoning of Dr. Amit Kumar on an equal footing. The power under Section 30 to remove difficulties by order cannot be exercised, because it expired two years from the date of commencement.[45]

Second, publish a test of unwelcomeness. guidance might direct committees towards taking an evaluation of unwelcomeness based on the perception of the complainant and whether a reasonable person would perceive the conduct as unacceptable. This advice would use the structure of section 26(4) of the Equality Act 2010.[46] The use of severity scales used in corporate training, such as the "Harometer," which is included in one employer-led training program, demonstrates how such guidance might be made practical.[47]

Third, standardise IC training and procedure. The Supreme Court has already required orientation programmes and standard operating procedures; the reform is to make the content uniform and auditable, including on digital evidence and respondents' hearing rights.[48]

Fourth, define the employer's preventive standard. Section 19 lists employer duties, but a breach is met by a fine of up to fifty thousand rupees. The United Kingdom has moved from a duty to take "reasonable steps" to prevent sexual harassment, in force since October 26, 2024, to "all reasonable steps", reported to take effect on October 30, 2026.[49] India need not copy the formula, but the model shows a preventive duty framed as an outcome-oriented standard rather than a checklist. Whether it works in practice remains to be seen.

[43] POSH Act § 14(1) & provisos.
[44] POSH Act § 29(1), (2)(e).
[45] POSH Act § 30(1) proviso.
[46] Equality Act 2010, c. 15, § 26(4) (UK).
[47] The Harometer is a training aid and has no statutory or judicial standing; it is mentioned only as an illustration of a graded-severity approach.
[48] *Aureliano Fernandes*, [2023] 7 S.C.R. 772, ¶ 77(iv)–(vii).
[49] Worker Protection (Amendment of Equality Act 2010) Act 2023 (UK); Employment Rights Act 2025 (UK); *see* CMS, *supra*-Part 5 (commencement dates).

8. CONCLUSION

The POSH Act's "unwelcome" standard is adequate in principle and inconsistent in practice. Its text can reach covert conduct, silent complainants and, with a purposive reading, online settings, and the Supreme Court's case law supports an effect-focused approach. But the Act supplies no test for unwelcomeness, leaves the sexual-nature threshold to interpretation, and never mentions virtual workplaces, so outcomes depend on the committee and the forum. The remedy is rules clarifying the workplace, published guidance on assessing unwelcomeness, uniform training, and a defined preventive duty for employers, all balanced by the procedural fairness that *Aureliano Fernandes* demands. A safe working environment is a condition of decent work, which is why this question belongs in labour welfare.

TABLE OF AUTHORITIES

Statutes

- Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, No. 14, Acts of Parliament, 2013 (India).
- Equality Act 2010, c. 15 (UK).
- Worker Protection (Amendment of Equality Act 2010) Act 2023 (UK).
- Employment Rights Act 2025 (UK).
- Civil Rights Act of 1964, Title VII, 42 U.S.C. § 2000e-2(a)(1).

Cases

1. Apparel Export Promotion Council v. A.K. Chopra, (1999) 1 S.C.C. 759 (India).
2. Aureliano Fernandes v. State of Goa, [2023] 7 S.C.R. 772 (India).
3. Dr. Amit Kumar v. University of Delhi, W.P.(C) 586/2021 (Del. H.C.) (India).
4. Ellison v. Brady, 924 F.2d 872 (9th Cir. 1991).
5. Harris v. Forklift Systems, Inc., 510 U.S. 17 (1993).
6. Medha Kotwal Lele v. Union of India, (2013) 1 S.C.C. 297 (India).
7. Meritor Savings Bank, FSB v. Vinson, 477 U.S. 57 (1986).
8. Rupan Deol Bajaj v. K.P.S. Gill, (1995) 6 S.C.C. 194 (India).
9. Vishaka v. State of Rajasthan, (1997) 6 S.C.C. 241 (India).