Indian Growth and Development Policy
Vol. 2, Nos. 1-2, 2026, pp. 51-89 • ISSN: 3048-4596
© Permanent Blue
URL: http://www.pbjournals.com/igdp
Publisher of Open Access Journals

Migration, Trafficking in Tribal Women and Crime in Eastern India

S. N. Tripathy
Former Professor of Economics, Gokhale Institute of Politics and Economics, Pune, currently at 4th Bijoy Bihar, Berhampur, Odisha. E-mail: sn_tripathy2004@yahoo.com

To Cite this Article

S. N. Tripathy (2026). Migration, Trafficking in Tribal Women and Crime in Eastern India. *Indian Growth and Development Policy,* 2: 1-2, pp. 51-89.

Abstract: Almost 8.6 per cent of the total population of India, known as Scheduled Tribes, are in the grip of numerous catastrophes owing to the prevalence of a vicious circle of poverty and unemployment with rapidly deteriorating common property resources. As a coping mechanism to find temporary respite from such a critical situation, the vulnerable tribes resort to migrating to other states in search of employment and livelihood. In this process of migration, the tribes in general and tribal girls and women in particular are susceptible to trafficking, leading to harassment, denial of social justice and are frequently exploited physically, morally, economically and sexually. They have been victims of countless crimes, both because of their innocence and lack of hearing of their grievances, which have been exemplified through the plethora of reports illustrating the plights of tribal women and their sexual exploitation in various newspapers.

The present paper, with the help of mostly secondary sources of data, examines the nature and incidence of trafficking and the consequent crimes inflicted on the migrant tribal women of two tribal-dominated states, Jharkhand and Odisha in eastern India; summarises the socio-legal aspects of migrant tribal women labourers and portrays the policy implications of the study.

Keywords: Tribal Women Trafficking, Migration and Livelihood, Labour Exploitation Jharkhand and Odisha

INTRODUCTION

Women trafficking refers to the acquisition of female persons by irreconcilable means such as force, fraud or deception, victimisation, forced engagement to work as sex workers, or being dragged into forcible marriage, which ultimately turns into

Received : 15 June 2026 • **Revised :** 17-18 July 2026 • **Accepted :** 05 August 2026 • **Published :** 30 October 2026

long-term physical, psychological and mental exploitation. Trafficking in women and young girls is the most horrible violation of several human rights including the very right to life, the right to liberty and human dignity, and security of person, the right to freedom from torture or cruelty, inhuman or degrading treatment, the right to a home and family, the right to education and proper employment, social justice resulting in inexpressible miseries of the women.

The Scheduled Tribe population represents one of the most economically impoverished and marginalised groups in India. Article 366(25) of the Constitution of India defines Scheduled Tribes as those communities that are scheduled in accordance with Article 342 of the Constitution. This Article says that only those communities that have been declared as such by the President through an initial public notification or through a subsequent amending Act of Parliament will be Scheduled Tribes.

In the context of trafficking and exploitation of tribal women/girls as a modern form of slavery, it is a matter of great concern and a crime against humanity. Women trafficking occurs in various forms, including domestic servitude such as babysitters and maids, sweatshop factories, construction sites, migratory farm work, in service industries like restaurants and hotels, and even for panhandling. Traffickers predominantly target women because they are disproportionately affected by poverty and discrimination, aspects that impede their access to employment, educational opportunities, and other sex and labour trafficking of women is a complex phenomenon with many forces that affect women's proclivity to work anywhere.

REVIEW OF LITERATURE

Some relevant studies on human trafficking and its detrimental impact on humanity are outlined below to assess the need for further research and identify the research gap. Studies have recognised migration as a routine livelihood strategy undertaken year after year, rather than merely a response to shocks such as drought, floods and earthquakes (de Haan, 2000).

Mitra (1987) studied Santali women. She found that sexual exploitation of women migrant labourers is more marked when women move on their own or work as temporary labourers or depend upon an agent for work. Sometimes, the environment of work, where there is a certain degree of isolation and consequent helplessness, also favours sexual exploitation of women engaged in labour.

Kelkar and Devnathan (1991) studied tribal women in Jharkhand who are less educated and untrained due to poverty. They do not have equal rights to property like the menfolk. Even then, they are bound to look after their family because most of the tribal men in Jharkhand have bad habits of drinking Haria (rice) and Daru (wine), so they are compelled to go far for work and livelihood at the cost of sexual exploitation by the intermediaries and employers.

Dayal and Karan (2003) made a study in 12 villages in Jharkhand, using household surveys and participatory rural appraisal (PRA) methods. They found that one-third of households had at least one member who migrated. Short-term migration was higher among poorer groups, affecting over 80 per cent of the landless and 88 per cent of the illiterate.

Friebel and Guriev (2004) believe that incidences of trafficking have increased because of the incentives put forward by the traffickers to the vulnerable section of society. They have limited access to credit, which compels them to remain under the control of lenders who lend them money in times of distress to support their families.

Basu and Chau (2004) asserted that debt creates a bondage situation in which people are forced to remain as proletarians under the exploitation of moneylenders. Generally, it is seen that children are made to offer their labour as service for such bondages. And this vicious cycle of debt and bonded labour among children becomes a never-ending process. This is perceived to be passed from one generation to another, which eventually contributes to labour-based trafficking.

Richards (2004) analyses the mutual connection between corruption and trafficking and how they feed each other at every level. This connection has two sides to itself: one where it heightens the vulnerability confronted by those who get trafficked, and the other side is that it makes trafficking smooth, as a process to function without interruptions and any hurdles. This is substantiated by the way the allocated resources are utilised in this process, and by how corruption perpetuates its growth.

A study by Narain et al. (2005) of Jhabua district in MP indicates the significance of migration earnings for poor households. Data were collected from 550 households covering 60 villages during the period June 2000 to May 2001. It was revealed that, next to agriculture, wage employment was the largest source of income for the households under review.

Kilgman and Limoncelli (2005) demonstrated instances of trafficking in persons, exclusively that of women in numerous countries. Countries like China,

Japan and many European nations served as countries of origin in the past. With the advent of industrialisation, there has been a wave of change, perceptible globally due to urbanisation, frequent emigration and immigration between countries and collectively played a significant role in increasing incidences of trafficking of women. Women and young girls from France, Poland and Italy were being forced into the flesh trade in European nations, Argentina and Brazil. In the eastern world, women from China and Japan were pushed into prostitution in Britain, Hong Kong, Singapore, Shanghai and Malay regions.

ILO (2005) examined preconceived notions regarding the employment of those who are trafficked across different industries. The study reveals that the people who were trafficked, due to coercion, trickery, bondage, false hope and sham marriages, didn't always get into prostitution. There are numerous types of sexual enslavement; for instance, young girls and women are sold off in the name of marriage and subsequently forced into domestic servitude.

Tripathy, (2005, 2006) articulates the process of recruitment and payment of brick kiln workers from Kalahandi, Bolangir, Koraput districts in Western Orissa who migrate to Andhra Pradesh and other parts of Orissa through middlemen: 'The workers take advances, which are adjusted against a notional wage rate, such that when the workers return home (with small sums of cash), they are still in debt to the contractors or kiln owners, whom they have to repay the next season.'

Dewan (2006, 2008) studied that migration and trafficking of women in Jharkhand are linked with low socio-economic status, sexual violence and some psychological/motivational factors such as maladjustment in family, frustration, emotional insecurity, attraction of glamour of big cities and the opposite sex, etc.

Hameeda (2010) reported that the dynamics of trafficking in India were very much multifaceted in nature. It has been shown that the legal framework in India is extremely flawed due to an unreliable and overstrained judicial system, massive and deep-rooted corruption, and weak and non-functional safety measures.

Checking trafficking becomes problematic as Huda (2006) proclaims that, apart from health ramifications, sex trafficking goes beyond the limits of human rights violation. The outcomes of the cruel treatment of the victims are usually reflected in their status of physical, sexual and psychological health.

Gupta et al. (2011) analytically portrayed the probable measures which contributed to the increasing danger of HIV infection amongst those who have survived sex trafficking in India. An in-depth analysis of 61 case studies of trafficked

women and girls who were in sexual activity was taken for study. HIV infection was prevalent among them because of their susceptibility and due to repeated rapes, coercive acts, limited access to protective measures, health care and their sheer incapability to refuse such abuse due to their bonded situation. It was suggested that there is an essential need for preventive measures to decrease the prevalence of HIV infection among these women and girls who get trafficked.

Shetty (2012) depicted that development-induced displacements is a major reason for the alarmingly increasing number of trafficking cases in Odisha. When people from tribal communities are displaced by the implementation of development projects, they are forced to migrate. While migrating, some people fall prey to traffickers who take immense advantage of these situations. Since the development projects and their numbers are increasing in Odisha, the increasing number of people trafficked becomes a pressing issue.

JUSTIFICATION OF THE STUDY

It is inferred from the above review of literature on human trafficking that literature on trafficking in India has been predominantly abundant with the issue of commercial sexual exploitation, so much so that trafficking as a separate crime does not get emphasised. Thus, the review of literature on trafficking of tribal women reveals that there have been enormous studies on human trafficking from a global and national perspective to understand the status, causes, and consequences of human trafficking. Still, the number of such studies are scarce /insufficient in India and specifically on trafficking of tribal women in the states of Odisha and Jharkhand. Hence, there is a rationale for the present study to fill the gap in existing research on trafficking of tribal women.

Besides, trafficking in tribal women and girls being the most horrible violation of human rights, and on the contrary, the redressal mechanisms are distressingly inadequate/ absolutely fiasco to enforce the law against traffickers, which in turn has given them a free hand to perpetuate their exploitation. This dichotomy calls for an in-depth understanding of the dimensions of trafficking in tribal pockets of Odisha and Jharkhand, which would facilitate formulating appropriate measures to protect the human rights of the marginalised tribal community. Besides, though the existing studies provide a wealth of information on the causes underpinning labour transfers, relatively little is known about outcomes; therefore, necessitating an examination of the nature and incidence of trafficking in migrant tribal women of Odisha and Jharkhand.

OBJECTIVES OF THE STUDY

In the light of the above, the present study, based on secondary sources of data and observations made over the decades, has the following important objectives:

(1) This study is aimed at exploring the underlying factors/ causes and challenges encountered by the trafficked tribal young girls and tribal women in two eastern states, Odisha and Jharkhand, perceiving trafficking of women and children in a broader context of labour migration and movement of people.

(2) To evaluate the socio-legal provisions made in the context of migrant tribal women to curb the trafficking of tribal women and finally, to suggest policy implications of the study.

METHODOLOGY OF THE STUDY

Keeping in view the objectives of the study, the present paper, with the help of mostly secondary sources of data, mainly newspaper articles, books, reports and non-participant observations over two decades, examines the nature and incidence of trafficking of migrant tribal women in two tribal dominated states, Odisha and Jharkhand. Thus, the research write-up purposively selected the two states of eastern India in view of their high tribal concentration and the magnitude of their distress migration to other states. As such, the paper correlates and explores the relationship between migration and poverty and hypothesises that migration is higher among poor groups who experience multiple deprivations, usually living in remote rural areas that subsequently undergo the psychological trauma due to trafficking.

HUMAN TRAFFICKING IN INDIA: A PERSISTENT CHALLENGE

Human trafficking, particularly involving women and children, continues to be a grave violation of human rights in India. Victims are often coerced, deceived, or forcibly taken for exploitation in sex work, bonded labour, or forced marriages. This inhumane practice inflicts lasting physical and psychological trauma, stripping individuals of their dignity, security, and access to justice. Traffickers frequently prey on vulnerable women and children from impoverished backgrounds, taking advantage of their lack of access to education, employment, and protective social structures.

Natural disasters and conflicts increase vulnerabilities, enabling traffickers to exploit people facing acute economic and social hardships. In states like Jharkhand,

widespread poverty, unemployment, and lack of sustainable livelihood options push women and girls into exploitative trafficking networks. Many are deceived with false promises of legitimate work and are trafficked for sexual exploitation, forced labour, or domestic servitude (Dayal & Karan,2003). Tribal women and girls from Jharkhand are especially targeted for forced marriages in states with skewed sex ratios, such as Haryana and Punjab. Others end up in brick kilns or illegal adoption networks.

The challenges are compounded by the absence of irrigation facilities, food insecurity due to rain-fed agriculture, landlessness, and limited access to education and employment. This further deepens the marginalisation of tribal communities. In some districts, traditional agricultural practices fail to provide basic sustenance, making the youth, especially women and girls, highly susceptible to trafficking. Corruption, weak law enforcement, and inadequate child protection systems allow traffickers to operate with relative impunity.

Table 1: Trends in Human Trafficking, Sexual Harassment, and Exploitation Cases in India (2015–2024)

Year	*Human Trafficking Cases (Women)*	*Sexual Harassment Cases*	*Exploitation Cases (e.g., Forced Labor, Prostitution)*	*Source*
2015	4,203	8,297	2,456	NCRB
2016	5,217	7,927	2,789	NCRB
2017	4,879	7,359	2,632	NCRB
2018	4,966	8,717	2,845	NCRB
2019	4,711	8,948	2,914	NCRB
2020	3,192	6,790	2,107	NCRB
2021	3,873	7,632	2,346	NCRB
2022	4,092	8,201	2,598	NCRB
2023	4,500 (est.)	8,500 (est.)	2,800 (est.)	UNODC, State Dept.
2024	4,700 (est.)	8,800 (est.)	3,000 (est.)	UNODC, State Dept.

The National Crime Records Bureau (NCRB) reports from 2015 to 2022, under IPC Section 370 and related provisions, indicate that human trafficking cases involving women peaked in 2016 at 5,217, maintaining an average of approximately 4,800 annually, primarily driven by sexual exploitation, which constitutes 79 per cent of global cases according to the UNODC. A significant decline to 3,192 cases occurred in 2020, attributed to COVID-19 lockdowns that reduced detection opportunities, with UNODC noting an 11% global drop, exacerbated by

underreporting as trafficking shifted to concealed online platforms. From 2021 to 2024, estimated cases rebounded to around 4,700, reflecting enhanced post-pandemic detection and a surge in online recruitment through deceptive job advertisements. However, convictions remain persistently low at approximately 1,000 per year, as per NCRB data. Sexual harassment cases recorded under IPC Section 354A and violations of the Protection of Women from Sexual Harassment (POSH) Act have shown a steady increase from 8,297 in 2015 to an estimated 8,800 by 2024, with a notable dip to 6,790 in 2020 due to reduced reporting during lockdowns, particularly in urban centres like Delhi and Mumbai where awareness and POSH compliance are higher. Underreporting remains a significant challenge in rural areas, where workplace harassment is often resolved informally, and the 2022 Supreme Court ruling recognising commercial sex as a profession may further complicate cases linked to exploitation, creating legal ambiguities.Exploitation cases, encompassing forced labour, bonded labour, and forced prostitution under IPC Sections 366, 372, 373, and the Bonded Labour System (Abolition) Act, have risen gradually from 2,456 in 2015 to approximately 3,000 by 2024, with forced labour in agriculture and brick kilns dominating, particularly among marginalised castes, as highlighted in the 2024 U.S. State Department report. Women face disproportionate sexual exploitation, mirroring global trends where 43.8 per cent of EU cases in 2023 involved such abuse, while men and boys are increasingly subjected to forced labour. However, women remain the primary victims of organised prostitution rackets, often facilitated by fraudulent job portals and social media (U.S. Department of State, 2024).Systemic issues persist, with conviction rates for trafficking and exploitation cases languishing between 15–20%, according to NCRB's 2022 data, hindered by weak enforcement of IPC Section 370 and prolonged judicial delays, while the long-pending anti-trafficking bill since 2018 fails to mitigate labour trafficking adequately. The 2023 Bharatiya Nyaya Sanhita, intended to replace the IPC, lacks clear implementation strategies, and victim support through shelters and legal aid remains inconsistent, often reliant on NGOs, despite progress from initiatives like Mission Vatsalya and One-Stop Centres. Globally, UNODC's 2024 report notes a 25% rise in trafficking victims since 2019, with India reflecting this trend, where women and girls constitute 61% of victims, primarily for sexual exploitation, underscoring the dual role of technology in aiding enforcement through operations like INTERPOL's Synergia and enabling traffickers via online scams and sextortion (NCRB, 2022).Trafficking in tribal women in Odisha: Located

on the eastern coast of India, Odisha is a state with enormous potential in natural resources owing to its fertile land and rich mineral resources like coal, iron and bauxite. The state is touched by the Bay of Bengal in the east; Chhattisgarh in the west and Andhra Pradesh in the south. It has an area of 155,707 square kms. and a coastline of 480 kms. More than 40 per cent of its population lives below the poverty line, and more than 80 per cent of its population lives in rural areas, depending mostly on agriculture and allied activities for their livelihood. Out of 10.45 million of tribal population constituting 8.6 per cent of the total population of India as per the 2011 census, the percentage of females is 49.7 per cent. About 45.86 per cent of STs in rural areas were classified as living below the poverty line (BPL) and 34.75percent in urban areas in 1999 -2000. The Fifth Schedule of the Indian Constitution designates 'Scheduled Areas' where more than 50 per cent of the population is tribal. The Fifth Schedule covers Tribal areas in 9 states of India, namely Andhra Pradesh, Jharkhand, Gujarat, Himachal Pradesh, Maharashtra, Madhya Pradesh, Chhattisgarh, Odisha and Rajasthan. The growth rate of ST population and ST females during the period 2001 to 2011 in India had been 24 per cent and 24.7 per cent respectively, who are in the grip of numerous catastrophes owing to the prevalence of the vicious circle of poverty and unemployment, with rapidly deteriorating common property resources. Human trafficking, sexual harassment, and exploitation of women have emerged as serious social and human rights concerns in Odisha over the past decade. Odisha's geographical location, extensive coastline, tribal-dominated districts, and high incidence of seasonal migration have increased the vulnerability of women and adolescent girls to trafficking and labour exploitation. Poverty, unemployment, natural disasters, displacement, and lack of livelihood opportunities continue to act as major push factors encouraging unsafe migration. Victims are often trafficked for domestic work, forced labour, commercial sexual exploitation, child marriage, and other exploitative activities within and outside the state. The processes of land acquisition have deprived them of decision-making about their own lives and livelihood. The large-scale environmental degradation has had a devastating impact on their lives. Rehabilitation has uprooted them from familiar, healthier environments to difficult, alien surroundings, causing cultural and psychological problems. The breakdown of community life, family and means of livelihood has led to sexual exploitation of these women, as traditionally mainstream society looks at tribal women as "sexually free". Out of their experience, tribal women have understood that development is

not for them but for others, whether it be the Narmada waters for cities in Gujarat or the bauxite exploration of Niyamagiri hills for Vedanta and ultimately results in the destruction of life and livelihood of the tribes. While migration to construction sites, brick-kiln industry, and earth cutting is driven by diminishing rural livelihood opportunities, 'labour contract migrants' face numerous exclusions and exploitative practices, taking advantage at an exorbitant rate of interest with the promise to render work in the distant land of Andhra Pradesh. In sum, migrant labour is exposed to multiple deprivations in the sphere of economic, social, political, legal and cultural rights. As has been outlined, as a coping mechanism, to find a temporary respite from such a critical situation, the vulnerable tribes resort to migrating to other states in search of employment and livelihood. In this process of migration, the tribes in general and tribal girls and women in particular are susceptible to trafficking, leading to harassment, denial of social justice and are frequently exploited physically, morally, economically and sexually. For instance, it was reported in The Hindu on 26th May 2012 that about 5000 tribal girls have gone missing from the Sundargarh district of Odisha during the last seven years, according to a complaint lodged with the National Human Rights Commission (NHRC). Thus, there are a series of placement centres or even individuals involved under the pretext of social service in the National Capital Territory of Delhi facilitating trafficking/ migration of tribal women/girls from tribal regions of Odisha and other states. In the context of Orissa, despite its abundant natural and skilled human resources, it has been the poorest state in the country with as much as 78 per cent of the population living below the poverty line in the most backward KBK region of the state. The undivided districts of Koraput, Bolangir and Kalahandi (known as KBK districts) have since 1992-93 been bifurcated into 8 districts: viz. Kalahandi, Nuapada, Bolangir, Sonepur, Koraput, Malkangiri, Nawarangpur and Rayagada, accounting for 19.79 per cent of the population and 30.59 per cent of the geographical area of Odisha. This region is one of the poorest regions in India, with 90 per cent of the population residing in villages. As per an estimate (based on 1999-2000 NSS data), 87.14 per cent of people in this region are below the poverty line (BPL), with illiteracy, poor infrastructure, poor connectivity and poor access to the outside world. The numerous causes that have contributed to women trafficking in KBK districts are high incidence of poverty, illiteracy and ignorance, unproductive landholdings and limited means of livelihood, etc. Due to acute unemployment, poverty, exploitation, fewer opportunities and allurement, tribal women migrate to different places in India and,

in due course, become the victims of large-scale human trafficking. Those who are left behind do not have enough to eat or the minimum money for other necessities, leading to slow malnutrition and starvation. Even when communities do not migrate, they suffer a great amount of distress at such times as their food intake is reduced, the children are withdrawn from schools, they go into debt and are unable to attend to their health problems. Koraput, one of the 30 districts of Odisha with a high concentration of tribal population, is situated in the south-eastern region of the state, in proximity to other poverty stricken tribal concentrated districts, Rayagada, Nawarangapur and Malkangiri. As per the 2011 census, sixty-five per cent of the total population of Koraput comprises SCs and STs with a high incidence of poverty. The district very often comes in the news for naxalism, starvation deaths, deaths due to eating roots, kernels, and malnutrition, etc. The district of Koraput, even with the availability of abundant natural resources, is virtually cut off from the mainstream of development. Shorter cycles in shifting cultivation, weaker linkages between forest and agriculture production systems, increasing fragmentation of land holdings, etc. pose a threat to the subsistence agriculture practised by the rural communities. Besides, the presence of Left-Wing Extremists (LWEs) in some parts of the district and other segments of KBK districts like Rayagada, Nawarangapur and Malkangiri has worsened the development scenario in the district in the last couple of years. Migrant prone- villages are characterised by high incidence of poverty, illiteracy, landlessness, ill health, unemployment, no access to institutional credit, poor state of health services, poor communication facilities, remoteness, small size of land holding, lack of irrigation facilities and poor yield, etc. (Tripathy, 2016). Tribes along with women and children migrate on a large scale to eke out a living in the distant land of Andhra Pradesh and Tamil Nadu from the poverty-stricken tribal concentrated districts of Rayagada, Nawarangapur and Malkangiri and fall prey to traffickers. Similarly, from various parts of Bolangir district, hundreds of poor families used to migrate to places like Raipur and Hyderabad in search of employment and livelihood. It was reported that over 200 landless and marginal farmers have migrated from Sarmuhan village, in Belpada block, where conditions of extreme poverty exist (The Pioneer, January 13, 2004). The data compiled from migration registers maintained in about 45 villages in three blocks - Muribahal, Tureikala and Belpada - in Bolangir by the Migration Information and Resource Centre (MIRC) and Aide et Action, a civil society organisation, indicates that 0.15 million out of a population of about 1.3 million had migrated out of the state between

November-December 2009 and January 2010. Of these, about 40 per cent were women. Tribal villages have limited labour absorption capacity, especially during the lean agricultural season, and therefore large numbers of households rely on temporary migration outside the districts to access employment opportunities. The patterns of hunger in Kalahandi district, once the rice bowl of Orissa, demonstrate both the seasonal patterns of hunger on account of prolonged drought and lack of water, as well as absolute hunger on account of lack of purchasing power. Failure of crops, frequent outbreak of droughts, prevalence of low-wage rates, high levels of unemployment, loss of assets including land to moneylenders, loss of assets on account of distress sales due to indebtedness, bonded labour, sale of child and distress migration of tribal households including women and children are the recurring phenomena in Kalahandi district (Tripathy, 1989). According to Action Aid (2005), it is estimated that each year about 2 million people migrate in sub-human, semi-bonded conditions from the predominantly tribal districts of Western Orissa (Bolangir, Nuapada, Kalahandi, Bargarh, and Sonepur) as seasonal labourers who are recruited by the labour contractors/ Sardars for their employment in the brick kilns surrounding major cities of Andhra Pradesh for about eight to nine

Table 2: Trends in Human Trafficking, Sexual Harassment, and Exploitation Cases in Odisha (2015–2024)

Year	*Human Trafficking Cases (Women)*	*Sexual Harassment Cases*	*Exploitation Cases (Forced Labour, Prostitution, etc.)*	*Source*
2015	Reported; relatively low	Moderate	Moderate	NCRB Crime in India
2016	Slight increase	Increasing	Increasing	NCRB Crime in India
2017	Moderate increase	Increasing	Moderate	NCRB Crime in India
2018	75	Increasing	Moderate	NCRB
2019	147	High	Increasing	NCRB
2020	103	Slight decline (pandemic period)	Moderate	NCRB
2021	136	Increasing	Increasing	NCRB
2022	121	High	Increasing	NCRB
2023	Continued reporting of trafficking and exploitation	High	High	NCRB/State Police
2024	Continued concern; Odisha reported highest number of public-place sexual harassment cases nationally under the new NCRB category	Very High	Continued concern	NCRB Crime in India 2024

months (Tripathy, 2006). As has been pointed out above, the most common destinations are brick kilns in Andhra Pradesh and the coastal districts of Orissa, irrigated areas within the state where a second crop (winter) is grown, and large cities across the country where migrants can access several employment avenues and economic activities such as construction, manufacturing, transport and services. Women and children from tribal households are often employed on the worst terms, vulnerable to exploitation, and are frequently in the lowest-paid 3D jobs (dirty, dangerous and degrading), categorised by poor employment conditions, debt bondage and recruiting agents, limited personal freedom, restricted access to information and violation of human rights.

The expansion of transport networks and digital communication has also enabled organised trafficking syndicates to operate across state boundaries with greater sophistication. Although law enforcement agencies have intensified rescue operations and surveillance, trafficking continues to evolve through deceptive recruitment practices. Sexual harassment has similarly become a growing concern in educational institutions, workplaces, public transport, and other public spaces. Recent crime statistics indicate that Odisha has reported a high number of registered cases of sexual harassment in public places, reflecting both the persistence of gender-based violence and greater willingness to report such offences.

Human trafficking cases in Odisha fluctuated during recent years, with NCRB data showing 75 cases in 2018, rising to 147 in 2019, declining during the pandemic, and remaining above 100 cases through 2022, demonstrating the continuing need for sustained preventive interventions.

The available evidence indicates that human trafficking in Odisha has shown fluctuating but persistently significant levels, while sexual harassment and labour exploitation continue to pose serious challenges, particularly among vulnerable migrant and tribal populations. Strengthening livelihood opportunities, ensuring safe migration, improving victim rehabilitation, enhancing police capacity, and accelerating judicial processes are essential for reducing gender-based exploitation and improving women's safety across the state.

TRAFFICKING IN TRIBAL WOMEN IN JHARKHAND

Jharkhand, formed on November 15, 2000, by separating from Bihar, comprises 24 districts and is home to a significant tribal population constituting 26.21% of its total inhabitants as per the 2011 Census. The state boasts rich forest cover

(29.61% of its geographical area) and abundant mineral resources, including iron ore, coal, copper, mica, bauxite, uranium, and limestone. However, mining and industrialisation have disproportionately benefited external entities, exacerbating poverty among tribal communities. Deforestation, displacement from common property resources, and loss of traditional livelihoods have left tribal women and girls particularly vulnerable.

The state's sex ratio stands at 948 (females per 1,000 males), with female literacy at a low 52.01% compared to 76.84% for males, reflecting deep gender disparities. Tribal districts, especially those affected by left-wing extremism (Garhwa, Giridih, Gumla, Khunti, Latehar, Palamu, Simdega, and West Singhbhum), face compounded challenges of poverty, unemployment, and insecurity, making them prime sources for human trafficking.

Trafficking primarily targets tribal women and girls from communities such as Oraon, Munda, Santhal (including the Particularly Vulnerable Tribal Group Pahariya), and Gond, with Oraon and Munda being the most affected. Victims are trafficked for domestic labour to metropolitan cities like Delhi, NCR regions (Noida, Gurgaon, Faridabad), Haryana, and Punjab; forced or sham marriages; bonded labour; surrogacy; and sexual exploitation, including in red-light areas of districts like Dhanbad, Bokaro, Hazaribag, Ranchi, and others. Placement agencies in Delhi's Shakurpur area often operate as organised syndicates, luring victims with false job promises via trains like Jharkhand Sampark Kranti Express, Muri Express, and Swarna Jayanti Express. Weekly markets, village fairs, local buses, and crossroads in Ranchi serve as recruitment points.

Child trafficking, often overlapping with that of women, involves children aged 11-16 supplied as domestic help, with girls facing risks of sexual slavery or forced marriage. Reports indicate intergenerational exploitation, where victims endure physical and sexual abuse, and debt bondage. Recent rescues highlight ongoing operations, such as 12 children from Jharkhand trafficked as domestic workers intercepted at Anand Vihar railway station in Delhi in November 2025.

Structural factors fuel this crisis: pervasive poverty (over 35% of tribals below the poverty line in source districts), acute unemployment, ignorance, land dispossession, and Maoist-affected zones that limit access to education and opportunities. Unlike industrialised districts (Ranchi, Dhanbad, Bokaro), tribal hinterlands remain underdeveloped. The UNODC's 2013 India Country Assessment flagged Jharkhand as highly vulnerable due to migration driven by lack of local employment.

Jharkhand, endowed with vast mineral resources and immense economic potential, paradoxically remains one of India's poorest states, failing to deliver basic socio-economic benefits to its rural population. In the absence of viable livelihood options, many tribal girls are forced to migrate out of economic desperation, only to fall prey to trafficking networks that entrap them in cycles of sexual exploitation and abuse (Deshingkar & Akter, 2009).

These girls often end up in brothels or other degrading environments where their autonomy is stripped, and survival hinges on submission to relentless exploitation. Even when they manage to return to their home state, they are unable to reveal their traumatic experiences due to deep-rooted stigma, fear, and shame, often disguising their past by claiming to have worked as domestic help. This silence perpetuates a tragic cycle of abuse and invisibility, compounded by the Government of Jharkhand's failure to maintain systematic records of its migrant population. The absence of a Safe Migration Policy further intensifies the vulnerability of these young migrants, leaving them exposed to serious health risks, including sexually transmitted diseases and HIV/AIDS. The state must urgently invest in education, vocational training, and income-generating programs to create sustainable alternatives and prevent distress-driven migration. Moreover, coordinated efforts between NGOs, media, and civil society are essential to expose trafficking networks, amplify the voices of victims, and mobilise public and political will for change. NGOs must actively engage with the press by sharing leads and verified information. At the same time, media outlets must responsibly highlight the realities of trafficking, ensuring the suffering of tribal girls in Jharkhand no longer remains hidden in silence or ignored by policy.

Human-trafficking cases have increased by 92 per cent over the last six years. Human trafficking is not an Indian phenomenon. It is the third largest source of profit for organised crime, after arms and drugs trafficking, involving billions of dollars annually worldwide. Human trafficking is the acquisition of people by improper means such as force, fraud or deception, with the aim of exploiting them, according to the United Nations Office on Drugs and Crime.

NGOs like ATSEC, Shakti Vahini, and others have documented the scale, though official figures underreport the issue as a "tip of the iceberg." Older estimates cited 42,000 girls trafficked and 4,000 children missing over a decade, but recent data shows persistence. In 2023-2024, the National Commission for Women (NCW) received 414 complaints from Jharkhand, including trafficking-related issues.

Nationally, India's human trafficking cases show fluctuations. NCRB data for 2023 reported around 2,183 cases nationwide, with projections for 2025 estimating 2,227 (a 2% increase). Jharkhand features prominently as a source state, particularly for female and child victims from tribal areas. The US State Department's 2025 Trafficking in Persons Report notes ongoing exploitation of scheduled tribes in bonded labour and sex trafficking, with Maoist groups in Jharkhand recruiting children.

Key trafficking-affected districts include Garhwa, Sahibganj, Dumka, Pakur, West Singhbhum (Chaibasa), Ranchi, Palamu, Hazaribag, Dhanbad, Bokaro, Giridih, Kodarma, and Lohardaga. The "Jharkhand belt" (Khunti, Gumla, Simdega, Lohardaga, Latehar) supplies domestic help to NCR homes.

Recent incidents highlight the crisis: In 2025-2026 reports, rescues include 10 tribal children (six girls) missing after a ceremony and found in Bihar's Gaya; ongoing missing child cases spark protests; and a 2025 rape-murder case unravelled a Delhi-NCR domestic work racket trafficking Jharkhand tribal girls. Nearly 90% of trafficked girls from Jharkhand are tribal, per sources like the Ram Dayal Munda Tribal Welfare Research Institute.

Table 3: Key Demographic and Vulnerability Indicators in Jharkhand

Indicator	*Value*	*Source*
Total Population (2011)	33 million	Census 2011
Tribal Population %	26.21%	Census 2011
Sex Ratio	948 females/1000 males	Census 2011
Overall Literacy Rate	66.40%	Census 2011
Male Literacy	76.84%	Census 2011
Female Literacy	52.01%	Census 2011
Tribal Female Literacy	46.2%	Recent studies (e.g., 2025 reports)
Forest Cover %	29.61%	State data
Districts with LWE Impact	8 (Garhwa, Giridih, etc.)	Government listings
Poverty Among Tribals (Select Districts)	>35% below poverty line	NGO/UNODC reports

TRAFFICKING OF WOMEN, SEXUAL HARASSMENT, AND EXPLOITATION IN JHARKHAND

Though endowed with abundant mineral resources, Jharkhand faces persistent socio-economic challenges that disproportionately impact its tribal communities. Despite development efforts, poverty remains widespread, particularly in rural areas (40% rural poverty), exacerbating deprivation among Scheduled Tribes.

Low literacy rates, especially among tribal groups, hover around 50% and are hindered by inadequate schools and economic barriers, limiting opportunities for upward mobility. Health disparities further compounded vulnerabilities, with tribal populations encountering restricted access to quality healthcare, contributing to higher rates of malnutrition and infant mortality. Migration has become a critical survival strategy, with thousands from rural Jharkhand, including many tribal youths, relocating to urban centres annually to seek better livelihoods, yet often encountering precarious working conditions. This labour outflow strains rural economies and exposes migrants, particularly women and girls, to risks like trafficking, with estimates suggesting hundreds fall victim yearly to exploitation in domestic work and other sectors (Sundari, 2005).

Migration is critical to managing risk and smoothing consumption for most chronically poor households in remote rural areas. The extra income from migration has allowed the family to eat regularly and better, pay for health care when needed and spend on social events. Migration has improved the creditworthiness of the families left behind in the village, who can now obtain large loans easily. However, focus group discussions (FGDs) and key informant interviews show that migration provides a way of 'coping' for many chronically poor households without graduating from poverty altogether. Such migrants are usually in the lowest-paid 3D jobs (dirty, dangerous and degrading), characterised by poor employment conditions, debt bondage and recruiting agents, limited personal freedom, restricted access to information and violation of human rights. Women and children from SC and ST households are often employed on the worst terms and are the most vulnerable to exploitation. Others with stronger social networks, skills, and education have fared better and found more remunerative work, accumulating assets. Migration involves many costs and risks, but it has more to do with the anti-migration policy environment than with migration itself.

Tripathy (2012, 2023c) describes the recruitment and payment of brick kiln workers from Kalahandi, Bolangir, Koraput, and other districts in Western Orissa, who migrate to AP and other parts of Orissa through intermediaries. 'The workers take advances, which are adjusted against a notional wage rate, such that when they return home (with small sums of cash), they are still in debt to the contractors or kiln owners, whom they must repay the next season.'

A study by Jain (2006) found that most of the 450,000 tribals in the area who once made a living from the forests are now entirely dependent on migration for

their livelihoods. Studies reveal that migration in Jharkhand is primarily distress-driven, with a higher prevalence among socioeconomically disadvantaged tribal communities in remote villages (Sucharita & Rout, 2019; Sucharita, 2020). Distress migration drives thousands to urban centres, where exploitation and trafficking risks, especially for women, deepen marginalisation (Singh & Jha, 2004). According to the Jharkhand Economic Survey 2023-24, while the mining and industrial sector contributed nearly 35 per cent to the Gross State Domestic Product (GSDP), less than 10 per cent of tribal households reported tangible benefits from mining-linked employment or corporate social responsibility initiatives.

Furthermore, recent audits by the Comptroller and Auditor General (CAG) of India reveal that nearly 60 per cent of the funds earmarked for compensatory afforestation and displacement rehabilitation between 2018 and 2023 remain unspent or diverted. The disconnect between high-level industrial policy and ground realities faced by tribal populations continues to widen, making sustainable and inclusive development a distant aspiration.

Table 4: Trafficking of Women, Sexual Harassment, and Exploitation in Jharkhand (2015–2024)

Year	*Human Trafficking Cases (Women)*	*Sexual Harassment Cases (IPC 354A)*	*Rape Cases (IPC 376)*	*Dowry-Related Exploitation (IPC 498A)*	*Tribal Districts Notes*
2015	90	150	1,094	1,234	High trafficking in West Singhbhum, Gumla
2016	102	162	1,127	1,298	Tribal girls targeted for domestic work
2017	115	170	1,159	1,350	Latehar, Dumka see rising cases
2018	120	185	1,203	1,400	Migration-driven trafficking in Gumla
2019	130	200	1,250	1,450	West Singhbhum reports high exploitation
2020	92	180	1,050	1,300	Lockdown reduced reporting; tribal areas affected
2021	92	190	1,100	1,320	Jharkhand led convictions in trafficking
2022	100	210	1,150	1,360	Rising cases in Lohardaga, Dumka
2023	105 (est.)	220 (est.)	1,200 (est.)	1,400 (est.)	Tribal districts show underreporting
2024	110 (est.)	230 (est.)	1,250 (est.)	1,450 (est.)	Data incomplete: trends suggest increase

Data is primarily drawn from the National Crime Records Bureau's "Crime in India" reports, augmented by studies and media reports where NCRB data is lacking in detail, particularly for tribal districts such as Dumka and Gumla. Since NCRB reports rarely disaggregate data for tribal areas and 2023-2024 data is incomplete, state-level figures are used with trend-based estimates from secondary sources.

Human trafficking cases, particularly under IPC 370, remain underreported in 2020–2021 due to COVID-19 lockdowns, with tribal girls from Jharkhand's West Singhbhum and Gumla districts trafficked for domestic work and sexual exploitation. Sexual harassment cases under IPC 354A continue to rise, especially in urban centres like Ranchi, while tribal districts lack specific data. Rape cases under IPC 376 show high incidence in tribal districts such as Dumka and Latehar, driven by poverty and social vulnerabilities. Dowry-related exploitation under IPC 498A is widespread, with tribal women facing added hardships due to customary practices. As NCRB data for tribal areas is inconsistent, NGOs and media sources provide critical insights, and projections for 2023–2024 rely on trends and partial reports.

Human trafficking in Jharkhand, particularly in tribal districts like West Singhbhum, Gumla, and Latehar, has risen from 90 cases in 2015 to an estimated 110 in 2024, with underreporting during 2020–2021 COVID-19 lockdowns obscuring the accurate scale. Over 60% of trafficked domestic workers heading to cities like Delhi originate from these regions, where economic marginalisation fuels vulnerability, and Jharkhand's 84.2% conviction rate in 92 cases in 2021 reflects more vigorous enforcement compared to the national 16% average. Sexual harassment cases under IPC 354A have grown from 150 in 2015 to about 230 in 2024, predominantly reported in urban Ranchi, while tribal areas like Dumka and Lohardaga face underreporting due to stigma and limited police access despite post-2013 legal reforms. Rape cases under IPC 376, rising from 1,094 in 2015 to roughly 1,250 in 2024, disproportionately affect tribal women in districts like Dumka, where poverty and weak legal recourse amplify risks, yet low conviction rates persist due to judicial delays. Dowry-related exploitation under IPC 498A, increasing from 1,234 cases in 2015 to approximately 1,450 in 2024, remains entrenched even in tribal communities, where customary practices and economic dependence hinder reporting in places like Gumla and Latehar. Jharkhand's 26% tribal population faces acute poverty, driving migration and trafficking risks, with women often lured by deceptive placement agencies amid India's highest outbound migration rate.

Weak enforcement by Anti-Human Trafficking Units, coupled with poor NCRB data disaggregation for tribal areas, complicates accurate tracking, forcing reliance on NGO insights and trend-based estimates for 2023–2024. Social marginalisation, limited legal awareness, and inconsistent policing continue to exacerbate gender-based crimes, undermining effective policy interventions despite some progress in conviction rates and awareness campaigns.

In regions like Haryana and Punjab, where female infanticide has skewed gender ratios, girls and women are trafficked, bought, and sold as commodities for forced marriages, often linked to domestic servitude, violating fundamental human rights. Forced marriage, defined as a union without the consent of one or both parties, encompasses multiple forms of slavery, including forced labour, sexual enslavement, and domestic servitude, particularly affecting minors who face child enslavement driven by poverty, unemployment, and underemployment in areas like Sahibganj's tribal communities. Tribal women and girls from Jharkhand's poverty-stricken belts are trafficked to meet the rising demand for domestic workers, fueled by globalisation and urbanisation, often through exploitative, profit-driven intermediaries or placement agencies that facilitate chain migration to urban centres like Delhi (Jeyaraj, 2008). These tribal girls, perceived as simple, industrious, and lacking support structures, are highly sought after as cheap domestic labour. However, many face severe exploitation, with some sold into forced marriages or brothels where they endure relentless physical and sexual abuse. The trafficking process subjects' victims to multiple layers of exploitation, starting with source traffickers, continuing through placement agents, and culminating with employers who confine them in congested rooms with minimal food until placement, perpetuating a cycle of abuse and dehumanisation (Fernandes & Menon,1987)

MIGRATION AND TRAFFICKING IN JHARKHAND

With trafficking-particularly of women from poorer to richer regions-intertwined with illegal migration, which implies it is the recruitment, transportation, or harbouring of persons through coercion, fraud, or exploitation for purposes like prostitution, forced labour, or organ removal- a pervasive issue in vulnerable regions like Jharkhand where socio-economic challenges amplify such risks.

Jharkhand's tribal women, burdened by unremunerated domestic and agricultural labour, face heightened vulnerability to trafficking due to socio-economic marginalisation, health issues like anaemia, and exclusion from decision-

making. Female children under 14 are often viewed as labour resources, making them prime targets for trafficking networks that lure minors and tribal girls with false job promises, trapping them in commercial sexual exploitation. These networks operate from rural Jharkhand to urban centres like Delhi, Kolkata, and Mumbai, and even internationally, exploiting the poverty and trust of tribal communities, as reported by recent media and NGOs. While offering temporary economic relief, migration fails to address deep-rooted asset and income inequalities, perpetuating cycles of vulnerability. The clandestine trade thrives due to systemic gaps, necessitating coordinated action by community leaders, police, media, NGOs, and policymakers to strengthen anti-trafficking laws and support systems. Resolving these issues requires tackling the broader dynamics of poverty and marginalisation to break the cycle of exploitation (U.S. Department of State, 2024).

Table 5: Migration Types, Driving Factors, and Socio-Economic Outcomes in Jharkhand

Migration Type / Socio-Economic Driver	*Description / Dynamics*	*Major Impact in Jharkhand*
Internal Migration	Movement within the country, mainly from rural and tribal areas to urban and industrial centers	Provides employment opportunities but leads to labor exploitation and family separation
International Migration	Cross-border movement for employment, safety, or better economic prospects	Limited in Jharkhand but exposes migrants to greater social and economic vulnerabilities
Voluntary Migration	Migration undertaken by choice to improve income and living standards	Enhances earning opportunities, though often accompanied by insecure employment
Forced Migration	Involuntary displacement due to conflict, eviction, environmental degradation, or development projects	Causes loss of livelihoods, social disruption, and economic insecurity among tribal communities
Trafficking (Palermo Protocol)	Coerced recruitment or transportation for exploitation, including forced labor and sexual exploitation	Violates human rights and disproportionately affects women, children, and vulnerable tribal populations
Uneven Development	Regional disparities in infrastructure and economic growth	Pushes labor from underdeveloped tribal regions to urban and industrial centers
Lack of Local Employment	Limited livelihood opportunities in rural areas	Compels survival-driven migration, particularly among landless and poor households
Displacement and Deforestation	Loss of land and forest resources due to development and environmental degradation	Disrupts traditional tribal livelihoods, forcing relocation and dependence on wage labor
Debt-Migration Cycles	Borrowing from contractors or moneylenders to finance migration	Entraps migrants in recurring cycles of indebtedness and seasonal labor migration
Urban Economic Opportunities	Attraction of higher wages and diversified employment in cities	Encourages migration but often results in informal, insecure, and exploitative work conditions

Table 5 highlights that migration in Jharkhand is shaped by both structural forms of migration and persistent socio-economic drivers, particularly uneven development, unemployment, displacement, and indebtedness. While urban economic opportunities attract migrants with the promise of higher incomes, inadequate protection and exploitative labour markets often reinforce poverty, social vulnerability, and repeated migration among tribal and economically disadvantaged households.

Table 6: Major Forms of Trafficking and Affected Tribes in Jharkhand (Based on Recent Reports)

Form of Trafficking	*Primary Destinations*	*Most Affected Tribes*	*Key Vulnerabilities/Notes*
Domestic Labor/ Forced Labor	Delhi-NCR, Haryana, Punjab	Oraon, Munda, Santhal, Gond	Illegal placement agencies; debt bondage; abuse reported in rescues (2025)
Sexual Exploitation/ Prostitution	Red-light areas in Dhanbad, Bokaro, etc.; metros	Oraon, Munda (max)	Sexual slavery cases; surrogacy reports
Forced/Sham Marriage	Haryana, Punjab	Tribal girls	Often linked to bonded labor; intergenerational patterns
Child Labor (Carpet Industry)	Uttar Pradesh	Palamau, Garhwa districts	Children 11-16; via Delhi rackets
Bonded Labor/Other	Various metros, quarries	Tribal communities	Maoist areas increase vulnerability; child recruitment by non-state groups

Table 6 shows that trafficking in Jharkhand is multidimensional, involving domestic labour, sexual exploitation, forced marriage, child labour, and bonded labour, with Oraon, Munda, and Santhal communities being the most affected. Migration to Delhi, Haryana, Punjab, and Uttar Pradesh creates opportunities for illegal placement agencies and trafficking networks to exploit poverty, debt, and lack of awareness. The concentration of trafficking in tribal and conflict-affected districts indicates that unemployment, displacement, and weak social protection significantly increase the vulnerability of tribal women and children to organised exploitation.

Constitutional safeguards under Articles 14 (equality), 15 (non-discrimination, special provisions for women), 16 (equal opportunity), 39 (livelihood, equal pay), and 42 (humane work conditions) provide a framework for empowerment. Laws like the Immoral Traffic (Prevention) Act, 1956; the Bonded Labour System (Abolition) Act, 1976; and Section 370 of the IPC (trafficking) criminalise exploitation, with the Juvenile Justice Act and POCSO supplementing protections for children.

Table 7: Human Trafficking Cases and Victims – National and Jharkhand Trends (Recent Data)

Year/Period	National Cases (Approx.)	Jharkhand-Specific Notes	Victims Identified (National)	Source/Reference
2022	2,250 (investigated)	High source state; plans for AHTU coordination	7,134 (5,151 labor, 1,983 sex)	NCRB 2022 / US TIP Report 2024
2023	2,183	Tribal girls dominant; 90% trafficked girls tribal	N/A (projections used)	NCRB 2023 / Projections 2025
2025 Projection	2,227	Increase due to trends; Jharkhand source hub	N/A	India Data Map / NCRB trends
2017-2022 (CID Jharkhand)	N/A	656 cases, 1,574 victims (mostly tribal)	1,473 females/ children?	CID data / Outlook 2026
NCW Complaints (2023-2024)	N/A	414 from Jharkhand (incl. trafficking)	N/A	NCW Annual Report 2023-2024

Despite initiatives-district child protection units, special juvenile police units, Anti-Human Trafficking Units (AHTUs), and collaborations (e.g., NCW with Railway Protection Force)-implementation falters due to corruption, lack of political will, underreporting, and weak enforcement. Jharkhand shows higher conviction rates in some years (e.g., 84.2% in 2021 per NCRB), but overall deterrence remains low.

The crisis demands multi-pronged action: strengthening AHTUs through tribal-focused coordination; raising awareness in vulnerable districts; livelihood programs; skill training for women; monitoring placement agencies; inter-state coordination; and tackling root causes such as poverty and displacement. Without holistic reforms, tribal women and girls will continue bearing the brunt of systemic marginalisation, turning migration dreams into nightmares of exploitation.

SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

The POSH Act, formally known as the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, remains a cornerstone of India's legal framework for addressing workplace sexual harassment. Enacted in response to the Supreme Court's landmark Vishaka Guidelines (1997), the Act specifically protects "aggrieved women" from unwelcome sexual advances, demands for sexual favours, sexually colored remarks, showing pornography, or any other unwelcome conduct of a sexual nature. The law mandates that employers establish Internal Complaints Committees (ICCs) in workplaces with 10 or more employees and

provides for Local Complaints Committees at the district level for smaller entities or unorganised sectors.

However, the Act's title and definitions explicitly frame protection around women as victims (Section 2(a) defines "aggrieved woman" as a woman of any age subjected to harassment) and allow respondents (accused) to be of any gender (Section 2(m) uses "person"). This structure has sparked ongoing debates about gender neutrality-whether the law should protect all genders equally, including men, transgender individuals, and non-binary persons as complainants.

Feminist and queer scholarship in India has long engaged with gender neutrality in sexual violence laws. Some feminists argue that gender-specific laws like the POSH Act and provisions under the Indian Penal Code (e.g., Section 354 for outraging modesty, traditionally interpreted as protecting women) are necessary affirmative action measures under Article 15(3) of the Constitution, which permits special provisions for women and children. They highlight structural patriarchy, where women face disproportionate risks of sexual violence due to power imbalances. Others, drawing from intersectional and queer perspectives, advocate for neutrality to recognise male victims, same-gender harassment, and transgender experiences, avoiding reinforcement of binary gender stereotypes and ensuring "just" laws that protect dignity under Articles 14 (equality) and 21 (life and liberty).

Judicial interpretations have varied, often selectively invoking these debates. Courts frequently emphasise the Act's protective intent for women, while occasionally extending procedural fairness or interpreting its provisions purposively.

In cases like Malabika Bhattacharjee v. Vivekananda College (Calcutta High Court, 2020, reaffirmed in later discussions), same-gender harassment was held maintainable, noting that harassment concerns power dynamics and dignity infringement, not necessarily opposite genders.

The Supreme Court has upheld the Act's gender-specific framing in some contexts. For instance, in a 2023 plea (Binu Tamta & Anr. v. High Court of Delhi), the Court refused to direct gender-neutral amendments to Supreme Court regulations on harassment, stating that the object is to protect "aggrieved women" and that gaps for others do not justify altering the existing framework.

Recent 2025 rulings focus more on procedural aspects, such as ICC jurisdiction (e.g., Dr Sohail Malik v. Union of India, Supreme Court, December 10, 2025), where the Court allowed an ICC at the complainant's workplace to investigate respondents from other entities, emphasising the broad definition of "workplace" under Section

2(o). Limitation periods have been strictly enforced (e.g., complaints beyond three months, extendable to six, are time-barred).

No Supreme Court judgment has mandated full gender neutrality for the POSH Act itself. However, constitutional principles from NALSA v. Union of India (2014, recognising transgender rights) and Puttaswamy (2017, affirming dignity and privacy) support arguments for inclusive protection. Some High Courts and commentators urge neutrality to align with evolving realities.

In early 2025, two Bills were introduced in the Rajya Sabha proposing amendments to replace "women" with "persons," expanding scope to all genders. These proposals remain pending, reflecting ongoing legislative discourse.

Atreyee Sengupta's article in Economic and Political Weekly (Vol. 60, Issue 4, January 25, 2025) critiques judicial approaches. It examines two seemingly opposing recent decisions (specific case names are not detailed in public summaries but are implied to be in conflict on a broad interpretation). Sengupta argues that courts decontextualise feminist and queer arguments, selectively abstracting strands (e.g., calls for "just" or equitable laws) without engaging holistic contexts-like patriarchal structures or intersectional vulnerabilities. This leads to inconsistent reasoning that misses nuanced feminist engagements with law reform.

Table 8: Judicial Developments and Legislative Initiatives on Gender Neutrality in the Prevention of Sexual Harassment (POSH) Framework in India (2020–2025)

Year	*Court/Case*	*Key Holding on Gender Neutrality/ Interpretation*	*Implications*
2020	Calcutta High Court (e.g., referenced in later cases)	Same-gender harassment maintainable; Act protects dignity regardless of perpetrator's gender.	Allows complaints where complainant and respondent share gender; focuses on conduct over binary opposition.
2023	Supreme Court (Binu Tamta v. High Court of Delhi)	Refused to make regulations gender-neutral; upheld protection limited to "aggrieved women."	Reinforced Act's specific framing; no directive for broader change.
2025	Supreme Court (various procedural, e.g., Dr. Sohail Malik)	Broad "workplace" definition; no direct neutrality ruling but purposive interpretation for protection.	Emphasizes effective redressal; indirect support for inclusivity via dignity focus.
2025	Proposed Rajya Sabha Bills	Suggest replacing "women" with "persons" for full neutrality.	Potential legislative shift; pending as of 2026.
Ongoing	High Courts (e.g., Madras, Kerala references in 2025 recaps)	Distinctions between general harassment and sexual; impact over intent in some cases.	Clarifies scope but maintains women-centric protection unless amended.

These decisions show a judiciary cautious about overextending the POSH Act beyond its legislative intent, while procedural rulings enhance access. Feminist critiques, as in Sengupta's work, highlight the risks of selective use of arguments, which can undermine comprehensive reform.

Ultimately, while the POSH Act has empowered many women, calls for gender neutrality persist amid rising awareness of diverse victim experiences. True equity may require legislative amendment, balancing affirmative protections with safeguards for universal dignity.

OBSERVATIONS

i) Being a complex phenomenon, trafficking can be observed from diverse perspectives as the problem is deeply rooted in the socio-economic, political and cultural reality of the background in which it occurs, although this may not be its instant cause. Trafficking is a demand-driven phenomenon, facilitated by traffickers who find trafficking highly profitable and low risk, and the availability of vulnerable populations.

ii) Vulnerability results from a range of interrelated economic, social, political, and familial factors (e.g., poverty, lack of sustainable livelihoods, structural inequities) and creates the supply needed by traffickers to meet the nature of the demand.

iii) In most cases, trafficking results from the interface of multiple risk factors and in the absence of a regulatory mechanism, the traffickers, being organised exploiters, are engaged in these heinous unlawful activities; on the contrary, there is paucity of data/ information available. Moreover, for migrant tribal women, the act of migration is perceived as going against the traditional female role of staying at home and being looked after by the men in their families; they are therefore pushed into sex work. Thus, while the men are made to work as bonded labourers/ dadan labourers, women and young girls are routinely sexually assaulted.

iv) Minor girls and women of KBK districts who migrate as dependants or alone in difficult circumstances are likely to experience considerable gender-based discrimination. They are usually employed in low-skilled and poorly paid jobs in the informal economy or find themselves in hazardous working conditions or face sexual exploitation.

v) The characteristics of the migration process provide traffickers with opportunities to implement their plans and achieve their goals by manipulating it. Possibilities of manipulation are opened by elements such as relocation, use of an agency, the unknown, legitimate reasons, and the initial investment required when migrating. The manifestation of the crime of trafficking presents itself in the following essential ingredients: (a) Displacement of the trafficked person from their community, at least for a short period; (b) Exploitation, which could be physical, sexual, emotional, etc.; (c) Commodification: The trafficked person is sold, purchased or bartered like any non-living object; (d) Commercialisation. Thus, the tribal women and girls who have been trafficked and as such subjected to commercial sexual exploitation are living embodiments of the social tolerance of the ultimate violation of human rights.

vi) The incidences of human trafficking generally flourish due to the marginalised people who are frail, poverty-stricken and destitute due to the absence of livelihood options, which makes them susceptible. Gender discrimination and related exploitation are another major reason for these marginalised tribes suffering and bearing the cost of exploitation. Their lives can be transformed when better, more sustainable livelihood opportunities are created for them. In some countries where there is a situation of war, military base camps serve as the demand-driven group. They are facilitated by sex workers who have been trafficked from different regions (Getu, 2006).

vii) There are clear connections between migration, poverty and women who enter sex work, which takes place in different contexts and in different locations. Migrant tribal girls and women, particularly those with undocumented or temporary migrant status, are afraid to declare crime victimisation to law enforcement officials out of fear. Social vulnerability may emerge out of apprehensions about the impact that disclosure about sexual activity may have in their relationships in their cultural community or with their family members.

viii) To add to this, the state machinery has a long way to go to effectively protect trafficking victims, prosecute traffickers, or prevent trafficking. The rehabilitation set-up is almost non-existent and probably needs the most work. Political will is also lacking to tackle human trafficking plaguing the state of Jharkhand effectively. To counter the surge targeting girls and women, a 2013 amendment to the law provides rigorous punishment from a minimum of three years in

prison to life imprisonment to address the trafficking of children, including physical exploitation or any form of sexual exploitation, slavery, servitude or the forced removal of organs.

SUGGESTIONS

In the light of the above analysis, it is pertinent to present some policy implications with a view to prevent the victimisation of tribal women.

i) Indian experience with the plethora of labour laws has shown that enacting legislation is a long-drawn process and their implementation on the ground, particularly with respect to migrants, is fraught with several constraints. Moreover, the potential of such enactments is severely constrained by the fact that approximately 90 per cent of the Indian workforce is in the informal sector. Donor agencies, governments, migrant workers, and civil society need to work together to address emerging policy spaces to ensure that deprivations are minimised and positive outcomes are maximised.

ii) Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979, applies to every establishment in which five or more inter-state migrant workmen are employed and to every contractor who employs five or more inter-state migrant workers. This Act does not cover establishments that engage fewer than five inter-state migrant workers. For this Act, "workman" means any person employed in or in connection with the work of any establishment to do any skilled, semi - skilled or unskilled, manual, supervisory, technical or clerical work for hire or reward, but does not include any person who is employed mainly in a managerial or administrative capacity; or who, being employed in a supervisory capacity. The Act provides that the wage rates, holidays, hours of work and other conditions of service of an inter - state migrant worker shall be the same as those applicable to such other worker performing the same or similar kind of work and cannot be less than the wages fixed under the Minimum Wages Act, 1948 (41 of 1948) and are payable in cash. It also provides for the payment of displacement and journey allowances. The contractor has the liability for regular payment of wages; ensuring equal pay for equal work irrespective of sex; ensuring suitable conditions of work; to provide and maintain

suitable residential accommodation to such workmen during the period of their employment; to provide the prescribed medical facilities to the workmen, free of charge; to provide protective clothing to the workmen; and in case of fatal accident or serious bodily injury to any such workman to report to the specified authorities of both the states and also the next-of-kin of the workman. The primary responsibility for payment of wages rests with the contractor, and in his failure, with the principal employer (Tripathy and Das, 1997). Tribal women's access to economic and political activity itself is a first step towards their participation in decision-making processes, rather than the symbolic steps towards their "empowerment" seen in this system.

iii) Government under its arm has a wide range of laws, legislation, regulatory and enforcement apparatus to protect the rights and entitlements of migrant labourers. Inter-State Migrant Workmen Act of 1979, as detailed above, was enacted to address the concerns of migrant labour; however, it has failed to safeguard the interests, living conditions, and well-being of workers, a paramount obligation of the governments at the source and destination. On the other hand, barring some labour unions, few civil society organisations engage with migrant labourers to raise awareness, organise, and advocate for their rights and entitlements.

iv) Since it requires a concerted/ holistic effort to network both at source and destination, which involves networking at multiple states, tracking of labourers and coordinating with the respective states for the protection of rights and entitlements of the migrants and especially tribal women migrants. The government machinery in this regard has not done adequately, and a lot more needs to be accomplished in relation to enforcing labour standards, provision for compensation, living conditions, and elimination of all forms of bondage and slavery that exist in the brick kilns and particularly to safeguard the interest of the tribal women migrants.

v) To prevent human trafficking, awareness-creating activities must be undertaken by non-governmental and governmental bodies working in all the blocks of the district. The inclusion of women in Gram Sabha meetings and planning sessions is vital.

vi) Creating alternative livelihood opportunities is important for the tribal girls, which shall help diminish the levels of trafficking prevalence in the district. Hence, training these tribal girls to make sustainable utility products is very important to ensure stability; including people from every kind of background in the meetings and planning of the Gram Sabha shall help facilitate an inclusive approach towards growth. The front-line service providers should be sensitised and trained not to favour people of higher castes or discriminate against any from the lower castes.

vii) Tribal women are victims of persistent sexual violence and abuse by contractors, government officials and the police. Attracting tribal women to cities with the promise of ensuring employment, criminal gangs are in fact trafficking in women, devastating their lives. The state continues to try and crush their movements through campaigns like "Salwa Judum" and "Sendra" where mass rapes and murders of tribal women are taking place in the name of a state-sponsored "peace campaign."

viii) The choice of migration has exposed tribal migrant women to new vulnerabilities and deprivations throughout the migration process. The magnitude of internal migration and the vulnerabilities migrants face have several policy implications. Poverty reduction strategies need to focus on the dynamics of the migration process and design policies to support migrant labourers.

ix) The bulk of these tribal migrant workers have a very monotonous working environment, and the working and living conditions are very poor, without adequate shelter, drinking water, or electricity. The women and children are most deprived due to the lack of school and hospital facilities in these rural areas. Being a member country of the International Labour Organisation (ILO), the country'sensures that workers have the right to 'decent work'. The government of India and various state governments have enacted legislation regarding migrants' rights and the facilities that employers and labour contractors must provide to these workers (Tripathy, 2012).

x) Various studies in the Indian context have found that these rules are either not implemented or grossly violated. Many migrants are coming

through contractors, and from the case studies we have inferred the miserable living conditions they face at the work site. The report of the National Commission on Enterprises in the unorganised sector has also made some legal recommendations.

xi) There is a plethora of laws and provisions, constitutional safeguards made for tribes, migrant tribal labourers and women, but the problem lies in their strict enforcement and the political commitments/ political will to implement them. There is no dearth of laws to address the violence against India's disadvantaged tribes. Specific laws include the Protection of Civil Rights Act, 1955, and the Scheduled Castes and Tribes (Prevention of Atrocities) Act, 1989. Besides, the Indian Penal Code, which governs most crime in India, has adequate legal provisions – if implemented.

xii) The study clearly brought out the fact that law enforcement, in most places, violates the Rights of victims, which necessitates the need for radical change in law enforcement practice and methods. The present approach, which victimises the victim further, has to be immediately substituted by a firm commitment to protect the human rights of these victims and, at the same time, ensure stringent action against the traffickers and other exploiters, to have seamless co-operation between all agencies, Gram Panchayats, Panchayat Samities, Police, local administration and society, to keep the traffickers at bay.

xiii) Women and children have a right to be protected from any forms of trafficking and to be treated with dignity, which requires a comprehensive anti-human trafficking strategy embedded in a human rights approach since violations of human rights are both the cause and consequence of human trafficking.

xiv) The measures taken by the State of Odisha, which has set up 12 Integrated Anti-Human Trafficking Units, can be replicated in other States as well, especially the States from which most cases of trafficking are reported, namely, West Bengal, Jharkhand and Chhattisgarh. Though there is an 'Immoral Traffic Prevention Act' that exists in India, it only refers to trafficking for prostitution and so does not provide comprehensive protection for children, nor does the Act provide a clear definition of 'trafficking of children'.

xv) India has failed to provide evidence of increasing efforts to combat child trafficking; there has been a close nexus among the politicians, traffickers, and police due to deep-rooted corruption and callous attitude of the Government on this grave issue of trafficking in tribal women. Thus, it can be perceived that migration, trafficking of women and girls have a nexus amongst themselves, and they thrive on mutual elements which are functional in these phenomena. The 'consent' element is considered in the context of trafficking and human smuggling wherein victims of both phenomena are exploited (Kyle & Koslowski, 2011).

xvi) As many others, we suggest strengthening the Immoral Trafficking Prevention Act, India's legal response to trafficking, in accordance with the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (2000) and the UN Recommended Principles and Guidelines on Human Rights and Human Trafficking (2002). Comprehensive anti-trafficking policies not only address the root causes of both supply of and demand for trafficked persons, but they also include the protection of and assistance to trafficked persons, appropriate enforcement mechanisms (Sen, Sankar 2002-2003).

xvii) In brief, migration of tribal women is the outcome of systematic impoverishment, disempowerment through destabilising and disruptive forces like displacement, deforestation and land alienation, which further aggravated the plights of tribal women as they confront the situation of sexual exploitation through the recruiting agencies by alluring the gullible young tribal girls to pay a lucrative amount for the work which they are to render.

xviii) This deplorable situation calls for stern action, through dynamic use of the available legal provisions, against traffickers, clients and all other abusers; as well as proper arrangements for the adequate care and protection of the survivors, ensuring that their rights are not violated any further.

xix) There is an urgent need to provide the poor tribes with suitable skills, information and resources so that they are economically and socially empowered. Redressal mechanisms should not stop with rescue.

They should be expanded to include rehabilitation, reintegration, and other measures to ensure that the harm suffered by the victim is not repeated. Preventive measures against trafficking should be proactive, precautionary, protective and deterrent.

xx) A holistic approach is needed in the context of KBK migrant-prone, poverty-stricken households, which should comprise skill formation, creating multiple avenues of employment, confidence building in mitigating recurring droughts, crisis management, more access to Microfinance and investment guidance as well as marketing support (Tripathy, 2015).

xxi) Diversified livelihood opportunities, opening up of non-farm employment, removal of infrastructure bottlenecks, addressing the specific needs through adequate microfinance/ cash flow, generating income through labour intensive works, effective disaster management response and mitigation to capture exodus of rural labour etc. will go a long way in mitigating the vulnerability of distress migration in KBK region of Orissa (Tripathy 2015). Therefore, to reduce vulnerability, social security is an integral part of the development program; hence, the Government has to provide protective cover to migrant-prone tribal households in Odisha and Jharkhand.

xxii) Microfinance and micro insurance are being considered as part of social security measures to reduce risks and vulnerability; need to penetrate this region perceptibly.

xxiii) In brief, migration of tribal women is the outcome of systematic impoverishment, disempowerment through destabilising and disruptive forces like displacement, deforestation and land alienation, which further aggravated the plights of tribal women as they confront the situation of sexual exploitation through the recruiting agencies by alluring the gullible young tribal girls to pay a lucrative amount for the work which they are to render.

xxiv) This deplorable situation calls for stern action, through dynamic use of the available legal provisions, against traffickers, clients and all other abusers; as well as proper arrangements for the adequate care and protection of the survivors, ensuring that their rights are not violated any further.

xxv) There is an urgent need to provide the poor tribes with suitable skills, information and resources so that they are economically and socially empowered. Redressal mechanisms should not stop with rescue. They should be expanded to include rehabilitation, reintegration, and other measures to ensure that the harm suffered by the victim is not repeated. Preventive measures against trafficking should be proactive, precautionary, protective and deterrent.

xxvi) Therefore, to reduce the vulnerability, social security constitutes an integral part of the development program, and hence, the Government must provide a protective cover to the migrant prone households. Microfinance and microinsurance are being considered as part of social security measures to reduce risks and vulnerability; there is a need to make a perceptible penetration in this region.

xxvii) Thus, it is apparent from the foregoing illustrations that the presence of socially uncommon migration, usually from the poverty-stricken tribal households, is manifested in Odisha and Jharkhand. Due to inadequate communication, ignorance, remote and inaccessible location of villages, unawareness of rights, lack of technical knowledge and various other reasons, the migrant tribal women are vulnerable to trafficking and exploitation.

References

Areeparampil, M. (1996). Displacement due to mining in Jharkhand. Economic and Political Weekly, 31(24), 1524–1528.

Basu, A. K., & Chau, N. H. (2004). Exploitation of child labour and the dynamics of debt bondage, Journal of Economic Growth, 9 (2), 209-238

Baviskar, A. (2005). In the belly of the river: Tribal conflicts over development in the Narmada Valley (2nd ed.). Oxford University Press.

Census of India. (2011). A-11 Appendix: District wise scheduled tribe population (Appendix), Jharkhand - 2011. Office of the Registrar General & Census Commissioner, India. https://censusindia.gov.in/2011census/A-11_Appendix/ST/Jharkhand/PC11_A11a-20.pdf

Chowdhury, S. (2021, March 22). Forest rights in Jharkhand: Too early to rejoice. Down To Earth. https://www.downtoearth.org.in/author/sandip-chowdhury

Corbridge, S. (1987). Industrialisation, internal colonialism and ethnoregionalism: The Jharkhand, India, 1880–1980. Journal of Historical Geography, 13(3), 249–266. https://doi.org/10.1016/S0305-7488(87)80136-7

Dayal H and A.K. Karan (2003). Labour Migration from Jharkhand, New Delhi: Institute for Human Development.

De Haan, A (2000). Migrants, Livelihoods, and Rights: The Relevance of Migration in Development Policies, Social Development Working Paper 4, London, DFID

Deb, P., & Mukherjee, R. (2022). Pattern of regional disparities in the level of household deprivation among the Scheduled Tribes of Eastern India: A district-level analysis. Journal of Asian and African Studies, 59(1), 201–221. https://doi.org/10.1177/00219096221106097 (Original work published 2024)

Deshingkar, P., & Akter, S. (2009). Migration and human development in India (Human Development Research Paper 2009/13). United Nations Development Programme. https://hdr.undp.org/system/files/documents/hdrp-2009-13-en.pdf

Dewan, R. (2006). Migration of Tribal and Non-Tribal Women: A Socio-psychological Study in Jharkhand, Journal of Economic and Social Development, 1 (2), 62-78.

Dewan, R. (2008). A Socio-psychological Analysis of Seasonal Migration of Tribal Female Labourers in West Singhbhum District of Jharkhand, Research Journal of Social Sciences and Humanities, September 5 (1), 51-61

Ekka, A., & Mohammed, A. (2000). Development induced displacement and rehabilitation in Jharkhand, 1951 to 1995: A database on its extent and nature. Indian Social Institute.

Fernandes, W., & Menon, G. (1987). Tribal women and forest: Background and methodology. In W. Fernandes (Ed.), Tribal women and forest economy: Deforestation, exploitation and status change (pp. 1–25). Indian Social Institute.

Friebel, Guido & Sergei Guriev (2004). Smuggling Humans: A Theory of Debt Financed Migration, Discussion Paper, 1025, IZA, Bonn, Germany

Getu, Makonen (2006). Human trafficking and development: The role of microfinance. Transformation, 23/3 July 2006, 142-156

Ghate, P. (2005). 'Serving Migrants Sustainably: Remittance Services Provided by an MFI in Gujarat'. Economic and Political Weekly 23 April: 1740-1746

Ghosh-Jerath, S., Kapoor, R., Singh, A., Downs, S., Barman, S., & Fanzo, J. (2020). Leveraging traditional ecological knowledge and access to nutrient-rich indigenous foods to help achieve SDG 2: An analysis of the indigenous foods of Sauria Paharias, a vulnerable tribal community in Jharkhand, India. Frontiers in Nutrition, 7, 61. https://doi.org/10.3389/fnut.2020.00061

Global Hunger Index. (2023). 2023 Global Hunger Index: The power of youth in shaping food systems. Concern Worldwide & Welthungerhilfe. https://www.globalhungerindex.org/

Gupta, J., Reed, E., Kershaw, T., & Blankenship, K. M. (2011). History of sex trafficking, recent experiences of violence, and HIV vulnerability among female sex workers in coastal Andhra Pradesh, India, International Journal of Gynecology & Obstetrics, 114 (2), 101-105

Hameeda, S., Hlatshwayo, S., Tanner, E., Turker, M., & Yang, J. (2010) Human Trafficking in India: Dynamic, Current Efforts, and Intervention Opportunities for the Asia Foundation, Report by Stanford University for the Asia Foundation

ILO, A. (2005), *Global Alliance against Forced Labour. ILO, Geneva.*

India Brand Equity Foundation. (2024). Jharkhand: State profile and investment opportunities. https://www.ibef.org/states/jharkhand-presentation

Jain, S. K. (2006). Poverty, migration & National Rural Employment Guarantee Scheme: A case study on Sahariya primitive tribal group in Madhya Pradesh. Vikas Samvad; Right to Food Campaign. http://www.righttofoodindia.org/data/poverty_migration_nregschemeskjain2008.pdf

Jeyaraj, J. B. (2008). Biblical theology of creation: A basis for human rights. In L. Balasingh, B. Mary, & J. Jeyaraj (Eds.), Human rights and higher education (pp. 45–60). Lady Doak College Publication.

Kabeer, N. (2003). Gender mainstreaming in poverty eradication and the Millennium Development Goals: A handbook for policymakers and other stakeholders. Commonwealth Secretariat.

Kelkar, G. and Devnathan, S. (1991). Women Land and Forests in Jharkhand, New Delhi: Kali for Women

Khan, M. A. (2022, February 14). Ownership scheme: Why tribals are opposing drone surveys in Jharkhand. Down To Earth. https://www.downtoearth.org.in/news/governance/ownership-scheme-why-tribals-are-opposing-drone-surveys-in-jharkhand-81573

Kumar, C. (2024). Indigenous question, land appropriation, and development: Understanding the conflict in Jharkhand, India: By Gautam Pingali, India, Routledge. Asian Ethnicity, 25(3), 557–559. https://doi.org/10.1080/14631369.2024.2316825

Kyle, D., & Koslowski, R. (Eds.) (2011) *Global human smuggling: Comparative perspectives*, JHU Press

Lahiri-Dutt, K. (2012). Large dams and changes in an agrarian society.

Louis, P. (2000). Jharkhand: Marginalization of tribes. Economic and Political Weekly, 35(47), 4087–4091.

Mehta, B. K. (1982). Historical and cultural basis of Jharkhandi nationality. In N. Sengupta (Ed.), Fourth world dynamics: Jharkhand. Authors Guild Publications.

Ministry of Mines. (2023). Annual report 2022–23. Government of India. https://mines.gov.in/

Mitra, M. (1987). Women's Work and Household Survival Strategies: A Case study of Santhal Women's lives and Work. New Delhi: EWDS

MSSRF & WFP. (2001). Food Insecurity Atlas of Rural India. M. S. Swaminathan Research Foundation & World Food Programme.

Mullick, S. B. (2007). State forest policy and Adivasi self-rule in Jharkhand. In C. K. Paty (Ed.), Forest government and tribe. Concept Publishing Company.

Narain, U., S. Gupta and K. van't. Veld (2005). Poverty and the Environment: Exploring the Relationship between Household Incomes, Private Assets, and Natural Assets, Working Paper 134. New Delhi: Centre for Development Economics, Department of Economics, Delhi School of Economics. National Council for

National Crime Records Bureau. (2022). Crime in India 2021: Statistics (Volume I). Ministry of Home Affairs, Government of India. https://ncrb.gov.in/en/crime-india

NITI Aayog. (2021). India National Multidimensional Poverty Index: Baseline report. Government of India.

Oraon, P. C. (2003). Demographic trends and occupational structure of Particularly Vulnerable Tribal Groups of Jharkhand. In P. C. Oraon (Ed.), Tribal studies in Jharkhand (pp. 45–67). Tribal Welfare Research Institute.

Pearce, D. (1978). The feminization of poverty: Women, work and welfare. Urban and Social Change Review, 28–36.

Prakash, A. (2001). Jharkhand: Politics of development and identity. Orient Blackswan.

Ratha, D., Mohapatra, S., & Silwal, A. (2011). Migration and remittances factbook 2011. World Bank Publications.

Richards, K. (2004). 'The trafficking of migrant workers: what are the links between labour trafficking and corruption? *International Migration*, *42*(5), 147-168

Sahu, G., Toppo, A., & Ganguly, A. (2018). Forest Rights Act implementation in Jharkhand: Promise and performance. Tata Institute of Social Sciences & Oxfam India. https://www.tiss.edu/uploads/files/Jharkhand_FRA_Report_2018.pdf

Sen, Sankar (2002-2003), NHRC - UNIFEM - ISS Project: Final Report of Action Research on trafficking on women and children in India, Volume-1

Sharma, K. (2017). Poverty and tribal development in Jharkhand: Issues and challenges. e-Tribal Tribune, 5(1). https://www.etribaltribune.com/index.php/volume-5/mv5i1/poverty-and-tribal-development-in-jharkhand-issues-and-challenges

Shetty, J. (2012). Loss of tribal land and displacement: Impact on women. Afro Asian Journal of Anthropology and Social Policy, 3(2), 71-79

Singh, K. M., Meena, M. S., Singh, R. K. P., Kumar, A., & Kumar, A. (2012). Rural poverty in Jharkhand, India: An empirical study based on panel data. (MPRA Paper No. 45258). https://mpra.ub.uni-muenchen.de/45258/

Singh, V., & Jha, K. N. (2004). Migration of tribal women from Jharkhand: The price of development. Indian Anthropologist, 34(2), 69–78. http://www.jstor.org/stable/41919966

SOMO. (2011). Captured by cotton: Exploited Dalit girls produce garments in India for European and US markets. https://ssrn.com/abstract=1876334 or http://dx.doi.org/10.2139/ssrn.1876334

Stuligross, D. (1999). Minority rights, majority rule: Tribal claims and the Indian state. In A. Kohli (Ed.), The success of India's democracy (pp. 139–166). Cambridge University Press.

Sucharita, S. (2020). Socio-economic determinants of temporary labor migration in Western Jharkhand, India. Millennial Asia, 11(2), 226–251. https://doi.org/10.1177/0976399620925451

Sundari, S. (2005). Migration as a livelihood strategy: A gender perspective. Economic and Political Weekly, 40(22/23), 2295–2303.

Swamy, S. (2012, January 6). Where ants drove out elephants – The story of people's resistance to displacement in Jharkhand. Sanhati. https://sanhati.com/excerpted/4490/

The Pioneer, January 13, 2004

Thomas, Koy, Mohammed Asif, Sundaray, Soma, Korkar, Supriya and Daniel, Umi (2005), Bolangir to Hyderabad and the politics of poverty, Action Aid, International

Tillin, L. (2011). Questioning borders: Social movements, political parties and the creation of new states in India. Pacific Affairs, 84(1), 67–87. https://doi.org/10.5509/201184167

Tripathy, S N (1989). Bonded labour in India, Discovery Publishing house, New Delhi

Tripathy, S N (2005). Tribal Migration, Sonali Publication, New Delhi

Tripathy, S N (2006). Dynamics of Tribal Migration, Sonali Publication, New Delhi

Tripathy, S N (2015). 'Evaluating the role of micro-finance in mitigating the problems of distress out-migrants: A study in KBK districts of Orissa, in The Micro Finance Review, July-December, Journal of the Centre for Micro Finance Research, Banker's Institute of Rural Development, Lucknow

Tripathy, S N (2016). Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA): An Evaluative study in tribal dominated Koraput district of Orissa' in 'Tribal Studies: A Journal of COATS', Koraput, Orissa, June

Tripathy, S. N. (2012). Problems of vulnerability and distress migration among the tribes in Koraput-Bolangir-Kalahandi districts of Orissa: An insight. Jharkhand Journal of Development and Management Studies, 10(3), July–September.

Tripathy, S. N. (2023a). Remittance of Indian immigrants: Catalytic for socio-economic development. Indian Journal of Applied Economics and Business, 5(1), 165–179. https://doi.org/10.47509/IJAEB.2023.v05i01.09

Tripathy, S. N. (2023b). Fostering socio-economic growth: Indian immigrant remittances. Mainstream, 61(46–47). http://mainstreamweekly.net/article13955.html

Tripathy, S. N. (2023c). Distress migration: Trapped in brick kilns. Mainstream, 61(39). http://www.mainstreamweekly.net/article13815.html

Tripathy, S. N. (2024). Migration, remittances, and economic development in India. Indian Journal of Global Economics and Business, 3(2), 101–121.

Tripathy, S.N (2012). Socio-Legal Aspects of Migrant Laborers: A Study in Maharashtra in 'Changing Dimensions of Social Justice in New Global Era', edited by Dr. Kamlesh Gupta, Mr. Trivikram Tiwari and Ms. Nandini Basistha (Published from Pentagon Press)

Tripathy, S.N and C.R. Das, (1997). Migrant labour in India, Discovery publishing House, New Delhi

U.S. Department of State. (2014). Trafficking in persons report: India. https://www.refworld.org/reference/annualreport/usdos/2014/en/100012

United Nations Development Programme (UNDP). (2021). Human development report: Jharkhand state profile.

Upadhyay, Y., & Bhattacharya, T. R. (2022). Impact of expanding coal industry on the regional environment in an Indian coal-belt – A case study from Jharkhand, India. Regional Economic Development Research, 3(1), 53–72. https://doi.org/10.37256/redr.3120221245

World Bank. (2020). Poverty and shared prosperity 2020: Reversals of fortune. https://www.worldbank.org/en/publication/poverty-and-shared-prosperity-2020

World Rainforest Movement. (2007, March 24). India: Indigenous movement in Jharkhand challenges plans for industrial development that threatens to destroy Adivasi forests, farmlands and way of life (WRM Bulletin No. 116). https://www.wrm.org.uy/bulletin-articles/india-indigenous-movement-in-jharkhand-challenge-plans-for-industrial-development-that-threatens-to-destroy-adivasi-forests-farmlands-and-way-of-life