



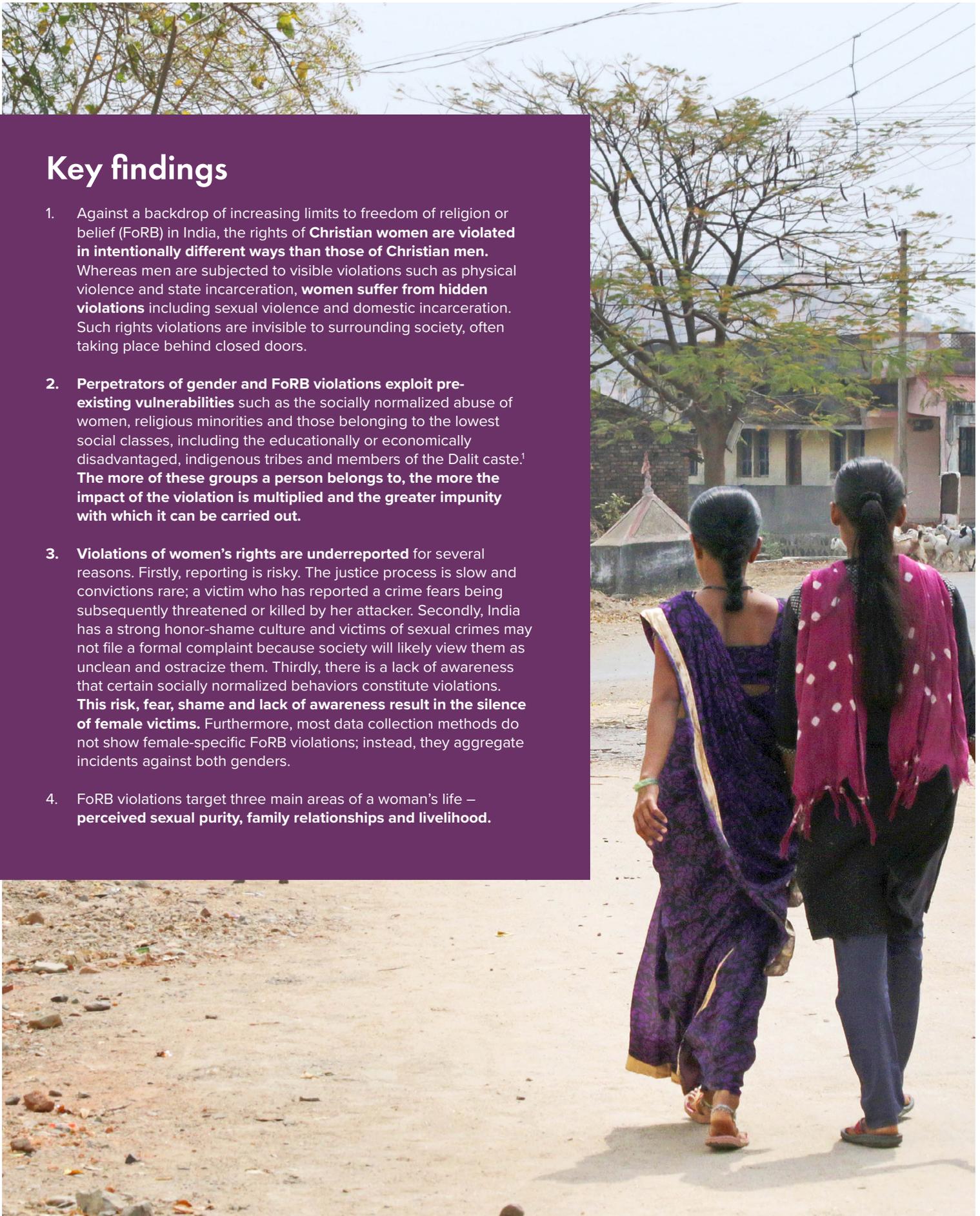
# BEHIND CLOSED DOORS

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Hidden abuse of Christian women in India

## Key findings

1. Against a backdrop of increasing limits to freedom of religion or belief (FoRB) in India, the rights of **Christian women are violated in intentionally different ways than those of Christian men.** Whereas men are subjected to visible violations such as physical violence and state incarceration, **women suffer from hidden violations** including sexual violence and domestic incarceration. Such rights violations are invisible to surrounding society, often taking place behind closed doors.
2. **Perpetrators of gender and FoRB violations exploit pre-existing vulnerabilities** such as the socially normalized abuse of women, religious minorities and those belonging to the lowest social classes, including the educationally or economically disadvantaged, indigenous tribes and members of the Dalit caste.<sup>1</sup> **The more of these groups a person belongs to, the more the impact of the violation is multiplied and the greater impunity with which it can be carried out.**
3. **Violations of women's rights are underreported** for several reasons. Firstly, reporting is risky. The justice process is slow and convictions rare; a victim who has reported a crime fears being subsequently threatened or killed by her attacker. Secondly, India has a strong honor-shame culture and victims of sexual crimes may not file a formal complaint because society will likely view them as unclean and ostracize them. Thirdly, there is a lack of awareness that certain socially normalized behaviors constitute violations. **This risk, fear, shame and lack of awareness result in the silence of female victims.** Furthermore, most data collection methods do not show female-specific FoRB violations; instead, they aggregate incidents against both genders.
4. FoRB violations target three main areas of a woman's life – **perceived sexual purity, family relationships and livelihood.**



Cover photo: Re-enactment of the story of Kirti\*, a Christian convert from Hinduism whose husband was killed and whose back was broken in a mob attack because of her new faith.

<sup>1</sup>Dalits (a term meaning “broken” or “scattered” in Sanskrit and Hindi) are also known as “untouchables” due to their low social position. They are officially called Scheduled Castes.

## Methodology

The goal of this report is to discover whether the combination of female gender and minority faith makes Christian women more vulnerable to gender and FoRB violations than Christian men and non-Christian women.

The research involved reviewing 2348 FoRB violation incidents which took place in India between 2016 and 2019. Our researcher used a combined qualitative data mining, coding and analysis approach, before analyzing independent studies and consulting experts who research or support Indians suffering on account of their Christian faith. The number of incidents reviewed in no way reflects the total number that took place during the reporting period. There is no comprehensive database for FoRB violations and, in any case, many go unreported for reasons which we will explore. India is vast, with around 70%<sup>2</sup> of its 1.38 billion population living in rural communities, where violations are harder to track. Abuse occurring within the home is also not easily recorded. The numbers should therefore be seen as absolute minimums with each reported incident representing many more that were not reported.

Names marked with an asterisk have been changed to protect the identities of those involved.



Photo: Tara\* is isolated because of her conversion to Christianity. Nobody in the house talks to her or even allows her to go to the kitchen, lest she pollute the food and water with her unclean faith.

<sup>2</sup> According to the 2011 Census of India, quoted in [The Hindu](#), 15 July 2011

<sup>3</sup> Article 18, [International Covenant on Civil and Political Rights](#)

<sup>4</sup> Fisher H., Miller E. '2020 Gender-Specific Religious Persecution' p. 22

<sup>5</sup> Johnson T.M. and Zurlo G.A. (eds.), [World Christian Database](#) (Leiden/Boston: Brill)

<sup>6</sup> [The Times of India](#), 13 April 2018

## Introduction

Globally, millions of people suffer violations for their faith in the form of violence, intolerance and discrimination, in spite of the universal human right to freedom of religion or belief (FoRB), which includes the right not to believe and the right to change beliefs.<sup>3</sup>

Another worldwide problem is gender inequality. In many countries, women do not have the same rights and opportunities as men. **Gender-specific religious persecution and discrimination occur when religious vulnerability compounds existing gender vulnerability. This double vulnerability increases both the risk and impact of a violation of the right to FoRB.**

Open Doors publishes an annual report on gender-specific religious persecution around the world. It finds that persecutors are agents of opportunity, seeking strategies that blend in with socially normalized abuse and which can be carried out with impunity.<sup>4</sup>

This report will focus on how Christian women in India suffer for their faith as these two infringements of their human rights intersect and overlap. It concludes with recommended actions for the international community to take in order to address the situation.

## Violations of the right to FoRB in India

72.5% of the Indian population identify as Hindu; Muslims and Christians make up 14.4% and 4.8% respectively.<sup>5</sup> Though India was historically known for its secular constitution and religious pluralism, **Hindu radicalism has gained momentum in recent decades.** Radicals subscribe to Hindutva ideology, the basic message of which is: If you're not Hindu, you're not Indian. Politicians from the ruling Bharatiya Janata Party (BJP) have publicly expressed<sup>6</sup> their aim to make India a Hindu-only country. The result of such ideology and rhetoric is a context where persecution and discrimination of religious minorities is widespread and can be carried out with impunity. This applies especially to non-Indic faiths such as Islam and Christianity, whose followers are seen as foreign agents and a threat to national cohesion.

Unprovoked attacks against Christians occur daily, largely perpetrated by non-state actors. Church services are raided by mobs, pastors beaten and whole families driven from their homes. Among others, the international human rights to life, liberty



Photo: Dalit children, India

and security, property, freedom from torture and freedom of assembly are regularly violated. And it's getting worse. **The annual number of reported incidents against Christians increased more than five times between 2014 and 2019.**<sup>7</sup>

**We also see the sustained and systematic targeting of Christians with the aim of squeezing them out of society.**

The incidents reviewed included 338 cases of social ostracism, 175 of denied access to communal resources, 139 of job discrimination, 125 of denied food and water, 63 fines for being a Christian, 50 reports of discrimination in education and 28 of denied inheritance. Ostracism, denial and discrimination are all means of treating Christians as second-rate citizens and preventing them from flourishing economically, socially and emotionally.

Eight of India's 28 states have an anti-conversion law<sup>8</sup> with several more planning to introduce legislation at time of writing. **Although these laws purport to protect citizens against involuntary conversions, they are frequently**

**misused to limit constitutionally protected religious activities such as church services and conversations about faith.**

23% of the incidents reviewed involved false accusations of forced conversion to Christianity. Conversion to Hinduism is exempted from such laws, either explicitly or in practice. Additionally, the Indian Penal Code bans "deliberate and malicious acts, intended to outrage religious feelings"<sup>9</sup> – a vague term that is easily manipulated to function as a blasphemy law and hinder freedom of religion. Punishment is a fine or imprisonment of up to three years.

The caste system, though technically outlawed, continues to affect every sphere of life. Dalits (also called "untouchables") are considered inferior to the other castes and segregated from the rest of society. **To improve their situation, the Indian government introduced affirmative action quotas<sup>10</sup> and access to justice mechanisms<sup>11</sup> for Dalits. However, Christian and Muslim Dalits are excluded from these programs.** The state considers them outside the caste system<sup>12</sup> and assumes they can receive economic help from their new faith networks. Since an estimated 70% of Indian Christians are Dalits,<sup>13</sup> these exclusions affect millions of Christians.

Faced with such pressures, it could be tempting to renounce a minority faith in favor of Hinduism. Ghar Wapsi (meaning "homecoming") is an initiative of right-wing nationalist groups which aims to bring non-Hindus "home" to the Hindu faith by re-converting them. In 2014, one such group, the VHP, alleged to have reconverted more than 33,000 people<sup>14</sup> in Ghar Wapsi ceremonies.

There are more factors negatively impacting life for Christians in India, which are explored in Open Doors' *We're Indians Too* report. The examples mentioned here serve to show that the right to freedom of religion or belief, enshrined in Article 25 of the Indian Constitution, is systematically and intentionally infringed.

## Entrenched and underreported: Abuse of women in India

Indian society is patriarchal and does not accord the same value to women as it does to men. As a result, we see female-selective abortion, female infanticide and baby girls being abandoned because parents prefer sons who will grow up to support the family financially. There are 54 million fewer women than men<sup>15</sup> and the chasm continues to widen. Women have lower literacy<sup>16</sup> rates and earn on average 19% less than men<sup>17</sup> – further indicators of gender inequality.

<sup>7</sup> *We're Indians Too*, Open Doors 2019, p. 11, and 2018 and 2019 reviewed incidents

<sup>8</sup> Odisha (1967), Madhya Pradesh (1968), Arunachal Pradesh (1978), Chhattisgarh (2000), Gujarat (2003), Himachal Pradesh (2006), Jharkhand (2017) and Uttarakhand (2018). The law in Arunachal Pradesh has not been fully implemented. Rajasthan has passed an anti-conversion bill but it has yet to be signed by the President of India. The states of Uttar Pradesh and Haryana announced proposed anti-conversion bills in November 2019 and June 2020, respectively.

<sup>9</sup> India Penal Code (1860), Section 295(a); see also Section 153(a) (creating disharmony among different religions). Both sections have been abused to falsely accuse Christians, often after the Christian has reported a FoRB violation to the police, turning the victim into the accused. See *We're Indians Too*, Open Doors 2019, pp. 18-19

<sup>10</sup> [Reservation in India](#)

<sup>11</sup> Scheduled Caste and Scheduled Tribes (Prevention of Atrocities) Act, 1989

<sup>12</sup> [Constitution \(Scheduled Castes\) Order](#), 1950, p. 1

<sup>13</sup> [The Diplomat](#), 22 August 2018

<sup>14</sup> [New Indian Express](#), 5 July 2015

<sup>15</sup> [UN World Population Prospects](#), 2019

<sup>16</sup> [Status of Literacy](#), 2011 Census of India

<sup>17</sup> [The Economic Times](#), 7 March 2019

Human rights reporting methods primarily capture visible violations such as beatings and destruction of buildings. The victims of visible violations are mostly male. Our research explored whether the lack of formal incident reports involving women is because the rights of religious minority women are not being violated, or because the violations are not being reported. After careful investigation, the conclusion was the latter. Here are four reasons why female persecution and discrimination are underreported:

- **Fear:** Reporting a crime can make a victim vulnerable to further attacks or murder by her aggressor, who will often have been released on bail. The justice process is slow and convictions rare.<sup>18</sup> The police have a reputation for brutality<sup>19</sup> and there have been cases of sexual violence against women in their custody.
- **Shame:** Many of the methods used to persecute women result in stigma. For example, rape victims are often viewed by society as sexually impure and ostracized, even though the crime was not their fault. A rape victim's future prospects are severely limited and they might even face rejection from their faith community. Moreover, in an honor-based society, failure to prevent a crime against a woman can reflect badly on male relatives. Staying silent prevents damage to a family's reputation.
- **Futility:** An organization working in India found that police refused to register 90% of complaints from Christians in 2019.<sup>20</sup> In BJP-governed states, police are known to threaten Christians, take part in raids on their meetings and give asylum to Hindu perpetrators, meaning that violations continue with impunity.
- **Normalization** of abuse such as domestic violence. Tragically, society can see certain behaviors as normal and not recognize them as violations.

## FoRB violations are not gender-blind

Open Doors' annual reports on Gender-Specific Religious Persecution<sup>21</sup> (GSRP) examine the situation across 50 countries to compare the ways in which male and female Christians suffer on the basis of their faith. The research team has found that men and women experience persecution and discrimination at definable and gender-specific Pressure Points<sup>22</sup> - areas which produce the greatest damage to their family or community when pressure is applied to them. These Pressure Points are marked in ***bold italics*** hereafter.

Men are traditionally seen as breadwinners, leaders and physically strong. A man is most weakened when his ability to fulfill these roles is attacked. He will be beaten since an injured man is impaired from working and providing for his family. He will be imprisoned since an incarcerated man cannot lead a church. Indeed, the 2020 GSRP report found that the top three Pressure Points for men are ***physical violence*** (reported in 82% of countries), ***economic harassment*** and ***incarceration by government*** (each reported in 66% of countries). These Pressure Points are specific to men – our 2348 cases showed a 20% greater incidence of reported ***physical violence*** for men than for women and that ***incarceration by government*** is five times more likely for men. Of course, the socio-economic repercussions will be felt by the whole family.

For women, the main Pressure Points according to the 2020 GSRP report are ***sexual violence*** and ***forced marriage*** (each reported in 84% of countries). These are linked to a woman's perceived sexual purity and dependent position within the family and community. Perpetrators of these abuses aim to damage their victims' reputations and crush them emotionally, binding them in silent shame and fear. Such tactics, often intentionally hidden from surrounding society, are used to



Photo: These women and their families were attacked and chased from their village on account of their Christian faith.

<sup>18</sup> According to [government statistics](#), 27% of rapes reported in 2018 led to a conviction.

<sup>19</sup> 17% of incidents analyzed for [We're Indians Too](#) (Open Doors, 2019) were perpetrated or exacerbated by police or government officials.

<sup>20</sup> Data available on file

<sup>21</sup> Fisher H., Miller E., '[2020 Gender-Specific Religious Persecution](#)'

<sup>22</sup> 'Pressure Points' are the social, legal, physical and economic pressures Christian men and women face on account of their faith. See pp. 25-27 for a [full list](#) of them.

push Christian women to abandon their faith and prevent them from passing it onto their children.

We will now look at three areas of vulnerability in a female's life – **perceived sexual purity, family relationships and livelihood**. An attack on any of these areas, when combined with religious vulnerability, results in gender-specific religious persecution and/or discrimination.

## 1. Perceived sexual purity

India has high levels of **sexual violence** - according to government statistics, a rape is reported on average every 15 minutes.<sup>23</sup> This figure is far from the total number since, as we have seen, **sexual violence** is severely underreported. Rape particularly affects Christians from the Dalit community, with one expert estimating that female Christian Dalits are more than twice as likely to be raped than female Hindu Dalits. Threat of rape can also be a powerful tool to control Christian women.

To give an example: Nine-year-old Anjali Masih from the Punjab region was playing with friends when three men lured her away with the promise of a guava and raped her, before strangling her to death with a telephone wire. Her parents had recently converted to Christianity and a local pastor explained that Anjali's murder was a warning to others thinking of leaving Hinduism.

About two-thirds of the 15,000 **trafficking** cases registered in India in 2016 involved female victims - nearly half were under 18 - with most sold into sex work or domestic servitude.<sup>24</sup> Fewer than 1% of Indians charged with slavery offenses are convicted.<sup>25</sup> This means that **trafficking** of females can be carried out with impunity, especially when they are young or belong to the lower classes, the latter being the case for most Christians in India.

**Sexual violence** occurs largely due to societal factors such as the normalized abuse of women (covered in the next section), but its high incidence is enabled by the government's lack of action. Only 27% of reported rape cases led to a conviction in 2018.<sup>26</sup> Police are not only unlikely to punish perpetrators but have even partaken in the violence.

## 2. Family relationships

According to the incidents reviewed, the second highest cause of death for Christian women (after murder following rape) is domestic violence, which has tragically been normalized to such an extent that many do not consider it wrong. The government has been slow to legislate, only passing the Protection of Women from Domestic Violence Act in 2005. Similarly, **incarceration by family**, which affected twice as many women than men according to the limited reports received, is seen as normal. Christian women living with Hindu relatives can be prevented from leaving the house, meeting friends, working, studying or accessing healthcare.



Photo: Neesa\* suffered domestic violence because of her faith and had to leave her village due to threats.

They effectively become invisible to society whilst pressure and violence are applied to "correct" their beliefs. Victims of domestic crimes are usually reluctant to bring dishonor to their families by reporting them.

Hindus, as well as Buddhists, Sikhs and Jains, are protected from non-consensual marriages by the Hindu Marriage Act of 1955<sup>27</sup> but Christians are explicitly excluded. Christians can therefore be forcibly married to Hindus, cut off from their churches and expected to change religion. **Forced marriage** (or **denied legal ability to marry a Christian**) leads not only to sexual violence but has a demographic impact as any children born to the couple will be Hindu. A married woman converting to Christianity is grounds for **forced divorce**,<sup>28</sup> which can lead to **denied custody of children**.<sup>29</sup>

Honor killings, murders of women usually carried out by family members, are one form of punishment for refusing to enter into a **forced marriage** or for suspected immoral behavior (such as conversion) that would reflect badly on the broader family.<sup>30</sup>

Again, much of the abuse in this category occurs for societal reasons but is facilitated by weak legislation and the government's reluctance to punish wrongdoing. Many positions of influence and authority are filled by hardline Hindus who are hostile to Christians.

## 3. Livelihood

Christian women, especially those from lower classes, experience **denial of communal resources, food and water**. In one incident, Hindu extremists, village committee members and police threatened Christian convert Soumya\* with seizing her ration card unless she returned to Hinduism. An expert

<sup>23</sup> [India Today](#), 11 January 2020

<sup>24</sup> [Thomson Reuter Foundation News](#), 26 June 2018

<sup>25</sup> [Reuters](#), 3 September 2019

<sup>26</sup> [India Today](#), 11 January 2020

<sup>27</sup> [The Hindu Marriage Act](#), 1955

<sup>28</sup> [Legistify](#), 9 February 2019

<sup>29</sup> Clause 6 of the 1956 Hindu Minority and Guardianship Act disqualifies converts from Hinduism from guardianship of their own children.

<sup>30</sup> Chesler, P. and Bloom, N., '[Hindu vs. Muslim Honor Killings](#)', *Middle East Quarterly*, Summer 2012



Photo: Re-enactment of the story of Kirti\*, a Christian convert from Hinduism whose husband was killed and whose back was broken in a mob attack because of her new faith.

told us: “It is usually women who collect ration cards, fetch water and buy food from markets. Normally you can get water and food within a mile of home but women who have been denied access to local sources may need to walk two or three miles. Women are more vulnerable to **abduction** or rape when they make longer journeys.”

Another tactic is **economic harassment** through denying women work across a variety of sectors from agricultural labor to teaching unless they convert to Hinduism. Christian Dalits walk up to 15 miles to find people willing to employ them and are paid considerably less than non-Christian laborers. Christian women can also be **denied inheritance or possessions**.<sup>31</sup>

**Denied access to social community** is a common punishment for Christian females and affects them deeply since networks of women usually support one another by sharing resources, childcare and friendship. At the extreme, Christian women are not only ignored and excluded but **forced out of home** or **forced to flee their town** by family members, extremists or a village committee. Neighbors who speak to ostracized Christians are themselves threatened with fines, violence or ostracism. To give an example from the incidents reviewed: Priya\*, a Christian widow, has been ostracized due to her faith. She is not allowed access to drinking water or to buy goods from the village shop. If the shop keeper sells her something, there is a fine of 25,000 rupees (335 USD.) Reports were received of Christian women committing suicide due to the impacts of social ostracism including increased vulnerability, loneliness, fear and despair.

We see from these three categories that violations of Christian women blend into the ambient abuse in Indian society. Whilst most violations are carried out by non-state actors, governmental inaction and police collusion encourage them. Female persecution and discrimination are low risk for the perpetrator. Any Christian challenging a crime faces counter accusations and every unpunished assault is an advertisement of impunity for perpetrators, further increasing the vulnerability of the Christian community and diminishing its resilience.

<sup>31</sup> A positive development: The Chief Minister of Uttarakhand recently announced a [legal change](#) which would allow women land ownership rights in recognition of the fact that women do the bulk of the agricultural labor.

## The impact of Covid-19

In 2020, the Covid-19 pandemic has had a profound global impact. The virus's effects were keenly felt in India – at time of writing, over 7.71 million cases had been recorded, the second highest number globally. Social distancing is impossible in poorer areas where 10 people can live in one room and all the residents of a street share a toilet. Lower class Christians rely on day-to-day work for income, which stopped during the lockdown. Some pastors, usually supported by their congregations, reached the brink of starvation.

39 experts from India responded to a survey carried out by in-country researchers regarding the impact of Covid-19 on religious communities. 77.3% of respondents were aware of religiously motivated attacks or direct persecution of Christian individuals during the pandemic. 81.8% of respondents were aware of acts of discrimination (for example, in provision of medical care and humanitarian assistance) against those belonging to a minority religion.<sup>32</sup>

Although discrimination in aid impacts whole families, it is women who usually collect relief packages so they feel the immediate effects of being overlooked. Sita\* shared her experience: "I work as a daily wage labourer. My workplace was closed due to the lockdown, which led to a shortage of food and essential items in my house. A couple of times there was relief distribution carried out in the village but they refused to help us, stating that we are Christians and we can easily get help from supporters, unlike non-Christians. The distributors did not give us any relief aid and discriminated against us, leaving us empty-handed." Open Doors' partners heard story after story confirming this discrimination in aid and had helped over 14,750 families across India at time of writing by providing food and hygiene parcels.

A rise in incidents of child marriage this year<sup>33</sup> has been linked to the economic hardship and closure of schools resulting from the pandemic. Child trafficking has also increased<sup>34</sup> as police and authorities were pre-occupied with Covid-19 measures and perpetrators were more able to act with impunity. We continue to learn about the gender-specific impact of Covid-19 on religious minorities, but fully expect that this additional vulnerability increases both the opportunities for and impact of FoRB violations for already highly vulnerable Christian women in India.



<sup>32</sup> Data available on file

<sup>33</sup> BBC News, 18 September 2020

<sup>34</sup> Ibid.



## Conclusion

Perpetrators of persecution and discrimination against religious minorities seek to produce the greatest damage to the faith community at the least risk to themselves. Since, in general, Indian women already have low political, social, legal and economic agency, perpetrators simply take advantage of this. The gender vulnerability exacerbates the vulnerability of belonging to a minority faith and vice versa. No great strategy needs to be devised to exploit this overlap of vulnerabilities.<sup>35</sup> Social class can further multiply the impact of violations - a lower class, Christian woman will be vulnerable on all three accounts, offering perpetrators more low risk, high impact ways of punishing them. The abuse of Christians is not gender-blind, nor is it ignorant of social class.

If violations such as incarceration by family or sexual violence are not recognized as common methods of targeting Christian females for their faith, the compound nature of the violation – violating the woman on the basis of both gender and faith – will be missed. Lack of awareness will lead to inaction. As well as being normalized by society, violations of Christian women in India are hidden from records due to the risk, fear and shame which keep women from reporting. Any solution would need to recognize societal normalization and the other reasons why violations are underreported, as well as the areas of a Christian woman's life where she is most likely to be attacked – perceived sexual purity, family relationships and livelihood.

Photo used for illustrative purposes.

<sup>35</sup> Fisher H., Miller E., '2020 Gender-specific Religious Persecution', p. 20

## Recommendations:

Humanitarian development programs directed at women generally do not take into account vulnerability due to minority faith. Similarly, programs directed at addressing FoRB violations often only address visible violations, excluding the tactics used to target women which, as we have seen, are hidden, entrenched in society and underreported. We therefore need to be creative as we seek to address the situation of Christian women in India.

### The international community should encourage the Government of India to...

- Give women equality in law and in practice by **amending the 1955 Hindu Marriage Act** to ban non-consensual marriages of all Indians, regardless of faith; amend **Section 13** of the same Act to remove conversion or apostasy as grounds for divorce; **amend the 2005 Protection of Women from Domestic Violence Act** to make punishment more severe and increase enforcement in order to deter perpetrators;
- **Uphold the right to freedom of religion or belief** by promoting faith diversity, prosecuting perpetrators of faith-based violence and promptly condemning any official who incites hatred or intolerance;
- **Remove all reference to faith in the 1950 Constitution (Scheduled Castes) Order** so that Dalits from minority faiths do not forfeit their Dalit status and can benefit from the same affirmative action and access to justice as Hindu Dalits.

### NGOs working in India should...

- **Increase legal assistance to female victims of FoRB violations**, including mediators to work with police and courts to encourage false claims against religious minorities to be dropped;

- **Continue to provide practical assistance and trauma counselling** for women who have suffered economically or emotionally as a result of a faith-based incident;
- **Introduce a common incident reporting and analysis system** to avoid duplication of labor and results. Such a system should disaggregate between the genders and take into account the secondary impacts of FoRB violations. Reporting should be done discretely to protect the identity and safety of the victim;
- Work together to **compare FoRB violations against different minority religions** in India.

### International aid agencies should...

- **Recognize the double vulnerability of women and girls from religious minorities**, which becomes a triple, compounded vulnerability in the case of female Christians from lower classes;
- **Include religion as a potential vulnerability factor** in programming assessments and include targeted aid for women from minority faiths.

