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# WOMEN'S PARTICIPATION IN THE LABOUR FORCE AND FEMINIST THEOLOGY

**Kanika Garg***

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**ABSTRACT**

*The paper starts with observing the status of women in India, particularly their low labour force participation rate. It further tries to develop an understanding of the reasons leading to women still not being socially accepted in the role of a priest in Hinduism and the dogma that is related to this vicissitude. A change is being observed in the 21st century, though the development has been too slow to be acclaimed as a success for the proponents of gender equality. The constitutional aspect of the issue concerning India is studied in the paper. It is observed that the law does not discriminate between men and women for the said job role, but it is the societal attitude towards religious beliefs that needs to be changed.*

***Keywords:*** *Gender Equality, Women Priests, Labour Force Participation, Hinduism.*

## 1. INTRODUCTION

When we talk about women's empowerment, we refer to the creation of a healthy environment where women can make independent and informed decisions about their personal and professional development. They have an important part in the progress of a nation as they comprise half the population. Female literacy rate in 1951 was 8.9% and became 64.6% in 2011.[1] The number of females per hundred males in higher education has risen from 13% in 1950-51 to 86% in 2015-16.[2] And, the labour force participation rate

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1 Ministry of Human Resource Development, "Educational Statistics-At a Glance-2018", March 22, 2018, *available at:* https://www.education.gov.in/sites/upload_files/mhrd/files/statistics-new/ESAG-2018.pdf (last visited on May 01, 2024).

2 *Id.* at 35.

for males and females above fifteen years of age during July-September, 2023 in India was 73.8% and 24%.[3] Statistics reflect a disturbing trend the nation is observing. Our women are attaining education, but they are not entering the workforce.

Former Prime Minister of India, Dr. Manmohan Singh expressing the situation of women in our country on the occasion of the inauguration of the Bhartiya Mahila Bank in 2013 said[4], "The sad reality is that women in India face discrimination and hardship at home, school, at their places of work, and in public places. Women's social, economic, and political empowerment remains a distant goal."

## 2. STATUS OF WOMEN IN INDIA

Every human being is born free yet, it's the laws that restrict her actions. Laws are meant to govern society, but we observe that men have shaped laws to suit their needs and to subdue women positioning them as inferior to them. Our laws and cultures are a depiction of this dominion of men over women.

### 2.1 History Of Indian Women

The status of women in India has seen various transformations with changing political conditions. Gargi was called *Brahmavadini* because of her knowledge of *Brahma vidya*. King Janak of Videha organized a '*brahmayajna*' once. Many well-known sages and gurus attended it, including Gargi. She asked a series of questions from sage Yajnavalkya on the *'atman'* (soul) in a conference of numerous scholars.

The medieval period has been described as the Dark Age for Indian women. Around 500 B.C., their position started to decline with the Manusmriti and with the Mughal invasion of Babur. Later, Christianity cut the freedom and rights of women. The Mughals practiced polygamy and randomly picked up young girls.

To prevent their daughters from being taken away, people started getting them married at a young age and the practice of *purdah* (veil) system became prevalent. Women were kept indoors, and not allowed to study or go for work. Women, whose husbands or

3 Ministry of Statistics & Programme Implementation, "Periodic Labour Force Survey (PLFS) – Quarterly Bulletin for July – September 2023", November 29, 2023, *available at:* https://pib.gov.in/PressReleaseIframePage.aspx?PRID=1980887#:~:text=Conceptual%20Framework%20of%20Key%20Employment,Rate%20(UR)%2C%20etc (last visited on May 01, 2024).

4 "Women face discrimination, empowerment distant goal: PM", *Hindustan Times*, Nov. 19, 2013, *available at:* http://www.hindustantimes.com/india/women-face-discrimination-empowerment-distant-goal-pm/story-URzBRClomqGydWSUlKgoQJ.html (last visited on February 02, 2024).

fathers or brothers got killed, did not feel secure and started committing suicide. This is how the practice of *'sati'* originated.

## 2.2 Transition From Ancient To Modern And The Role Of Law

From the ancient to the modern world, we observe that the status of women has been changing with the change in the societal mindset. In the ancient time, when society respected them, they gained knowledge and earned equal respect as men. During the medieval period, they were treated like property and had to observe certain behaviour for their protection. And, in the present time, we observe that society is adapting to accept women as equal to men. The transition is still under process, with progress moving from urban to rural areas. We hereby conclude that the status of women is heavily dependent on how other people, or the society they live in treats them. The more educated and liberal the society, the better the status women enjoy. Hence, it is the society that is regulating the lives of over half of its members.

The purpose of law is to remove the conflict of interest which may arise in a particular society. In today's world, we see that laws are there, but their enforcement is poor. Women's safety has been the major obstacle preventing women from emerging out of their shells of bondage. Acceptance by the society at large of the rights they acquire by their existence is the need of the hour. Why should there be a need for rape laws, dowry prohibition laws, or a law to prevent domestic violence against women? Why can't society accept the equal existence of half its members? Why do they hesitate to accept women in every profession? Why can't they co-exist peacefully without conflict? These are some questions that plague the life of every woman born on this land.

## 2.3 Present Status of Women

There have been improvements in the condition of women over the years. Various legislations in respect of sexual offences, domestic violence, dowry prohibition, widow re-marriage, etc. are in force to provide them safety and also opportunities in the form of various educational schemes and reservations in jobs. The status of Indian women is, however, an enigma. The education-work participation statistics reflect that Indian women are capable, yet don't utilize their skills as participants in the workforce. This also explains the minuscule percentage of women in certain sectors like technology. In 2017, Indian Institutes of Technology (IITs) had registered a representation of women at 9.3%.[5]

5 Neelam Pandey, "Number of female students at IITs set to go up", *Hindustan Times*, Jul. 15, 2017, *available at:* http://www.hindustantimes.com/india-news/improving-sex-ratio-in-iits-more-women-take-admission-in-2017/story-2EKeUwqbqG6ibB0Tf5EftL.html (last visited on February 02, 2024).

The next year, supernumerary seats were created for female students to increase their population on campus. In the 2022-23 academic session, 20% of the seats have been allotted to women candidates.[6] We need to answer the question of whether Indian women are not capable enough to compete with boys in entrance examinations. Or, are their families not supportive enough to encourage their education in such sectors? It is to be remembered that engineering education is no physical work, which may have benefitted boys.

It is observed that women are seen in the role of homemakers. Certain jobs are considered suitable for them, while others are not. The acceptability by society, and the conditioning they have received, bar their reach of prospective work in certain sectors. Society has developed its roles to be played by a man, and by a woman. Anyone not confirming by these rules is not readily acceptable.

## 3. FEMINIST THEOLOGY

Theology refers to the study of God. And, feminist theology refers to reconsidering theology, scriptures, practices, and traditions concerning the role of females and their experiences. It is observed that feminist theology rejects the patriarchal structure of the society where men dominate women. The starting point of feminist theology is women's experience, and the rejection of 'patriarchy' (the structure of society whereby men rule women). Women, it is argued, will only become truly human, with the ending of patriarchy.

Richard Flory in his commentary on The Long View of Women's Roles in Religion says,

"One of my favourite formulations is from the evangelical world, where the argument is that women and men are equal; it's just that God has given them different roles to play. Of course in this version, the primary role for men is to be in charge of women."[7]

### 3.1 Reasons Why Women Are Still Not Accepted In The Role Of Priests

India has a history of nurturing many social evils. Though the practice of *sati* has been completely abolished, issues including widow remarriage, untouchability, gender discrimination, the dowry system, and early marriage have shown improvement, but are

6 "Women still minority at IITs, efforts on to achieve gender parity, says IIT director Preeti Aghalayam", *The Hindu*, Jul 17, 2023, *available at:* https://www.thehindu.com/news/national/women-still-minority-at-iits-efforts-on-to-achieve-gender-parity-says-iit-director-preeti-aghalayam/article67087170.ece (last visited on May 01, 2024).

7 Richard Flory, "The Long View of Women's Roles in Religion", Jan. 22, 2010, *available at:* http://crcc.usc.edu/the-long-view-of-womens-roles-in-religion/ (last visited on February 02, 2024).

still prevalent. It's been more than 70 years since the country gained independence and the literacy rates have substantially improved. The societal mindset for certain evils has, however, not developed similarly.

All religions teach us that God is one. We should respect every living being. We should not look down upon anyone. Hinduism is among the major three religions across the globe. It preaches equality among individuals and respect for others. It is also to be understood that the Hindu discourse recognizes the concept of '*dharma*' rather than rights.[8] Dharma refers to righteousness in human actions and the duty of individuals towards other individuals, their ancestors, and God.

Manusmriti says, "Where women are honored, there the Gods are pleased, but where they are not honored, there no sacred rite yields reward."[9] It also says that no one should consult any of the following- idiot, dumb, blind, deaf, animal(s), very old men, women, sick, barbarian, and persons with physical disability.[10] Thus, it does not accord women with intelligence, comparing them with animals and disabled persons. Hence, it is observed that Manusmriti speaks differently about women in different places. In one place, it tells everybody to treat her as God. While on the other, it gives her a place lower than that of her male counterparts. The text is highly ambiguous about the status of women. Also, at a time when concepts like rights of intestate succession[11] have been settled focusing on equality between sons and daughters, it seems to be too orthodox to be followed. Had such texts been strictly followed, untouchability would have still been an active part of Indian cultural practices. In a land where the incarnation of women in the form of Goddesses Durga, Kali, Saraswati, and Lakshmi is worshipped, not accepting women as priests is not appreciable. Manusmriti is presumed to have been written from the 2nd century BC to the 3rd century BC. It, however, gained importance during the Mughal rule, and in British India when it was translated to English to lay a formal legal foundation for Hindu law.

Some other reasons have been listed below:

i. The patriarchal notion of society: A patriarchal society tries to exclude women from all sources of power and position. Men try to capture the rights of women

8 Arvind Sharma and Katherine K. Young (eds.), *Feminism and World Rights*, 26 (State University of New York, Albany, 1999).

9 G. Buhler, "Manusmriti: The Laws of Manu" 14 1500BC, *available at:* https://vedpuran.files.wordpress.com/2013/04/manusmriti.pdf (last visited on February 02, 2024).

10 *Id.* at 42.

11 Only recently in 2005, has the Parliament given an equal right of succession to daughters as coparceners in the property of a person who dies intestate. Earlier, only sons could be coparceners in such cases by the Hindu Succession (Amendment) Act, 2005 (Act 39 of 2005), s.3.

and supersede them so that they have control over them in terms of economic, social, and political relations.

ii. Lack of education and greater drop-out rates: Educating women folk is a major task to be achieved. Also, burdening them with household duties of cooking and looking after the family leads to greater drop-out rates.

iii. Lower labour participation rate of women: It is observed that the literacy rate of females has substantially improved since independence, however, their workforce participation has not followed suit. Females can enter the workforce, yet they don't join it. It is observed that the more powerful the position, the greater they are sidelined. Power is only namesake in certain cases, where husbands of women holding crucial posts manage the day-to-day affairs of their office. The impact of women's reservation in *panchayats* is one such example.

iv. Biasness for male child: Families in India favour sons over daughters. A family with limited economic resources would ensure that the son(s) get an education, even if the daughter(s) has to skip school. Since males are considered to be the breadwinners, families feel that they deserve a proper education to make a living. Daughters are therefore left out. A report by the Ministry of Statistics stated that generally, "expenditure on education for males is more than for females."[12] A report titled 'Early Years' which analyzed the pre-school and school education of children between the ages of four to eight years stated that a gender gap was observed concerning the education of young children in the country.[13] The population of girls in government schools was higher than the population of boys, while the opposite was observed in private schools.[14] "Among 4- and 5-year-old children, 56.8% girls and 50.4% boys are enrolled in government pre-schools or schools, while 43.2% girls and 49.6% boys are enrolled in private pre-schools or schools. The gap in enrollment between boys and girls is larger among 6- to 8-year-olds, with 61.1% of all girls versus 52.1% of all boys in this age group going to a government institution."[15]

12 NSO, "Women and Men in India, 2017", p.46, *available at:* https://www.mospi.gov.in/sites/default/files/publication_reports/Women%20and%20men%20in%20india-2017%20Mail.pdf (last visited on April 29, 2024).

13 Annual Status of Education Report (Rural) 2019, "Early Years", Jan, 2020, p.56.

14 *Ibid*.

15 *Ibid*.

v. Early marriage: Many women in India get married before attaining the age of adulthood. Early marriage, household responsibilities and pressure to bear children prevent their ability to acquire religious knowledge which needs rigorous training.

vi. Customs and practice stand on a greater footing than religious texts: Religious texts nowhere state that women cannot worship God or practice priesthood. The absence of women from the priest position is so widespread that any idea of allowing them appears alien. In the older days, majorly men attained education and women remained indoors. Since men were educated, they became priests and generations follow this blindfolded. They now consider it a custom for a male priest to perform the *pooja* or the *yagna*. Performance by a female priest is sometimes considered against the customary practice.

vii. Absence of acceptance: A working woman in the corporate sector is still acceptable as compared to a woman practicing priesthood. Employees of the corporate sector report to their bosses, who are well-read and educated. With the advent of multinational and transnational companies, employees travel overseas for their work engagements and meet and work with women in every role. There is therefore greater acceptability of women in the corporate world, as compared to the situation here with commoners within the country. The patriarchal form of society we live in does not easily accept changes that challenge their superiority over women. They create hurdles, and if not hurdles, they just don't let their avocation flourish.

viii. Tying of the sacred thread/Kankanam: Tying of the sacred thread is a ceremony wherein the sacred thread is tied to the body of a person. After this ceremony, he is deemed to have been re-born. He takes Goddess Saraswati as his mother and his Guru as his father, who imparts him the knowledge and training to attain priesthood. The ceremony can be performed by a man to man, or by a man to a woman only if they are married, since the acceptance of the gift by a woman from a man is considered adultery. This further delays time for the training of the woman.

ix. Biological: Women are considered impure during the period of menstruation. This restricts their ability to secure priest positions. This is a concept of the time when there was not much facilities or knowledge to maintain menstrual hygiene. The practice was carried on to prevent women from performing hard labour

during those days. It is observed that God has created women, and menstruation is a manifestation of His creation. Anything natural cannot be impure. Also, if a woman cannot practice priesthood during periods of impurity, she should practice it during periods of purity and when she reaches menopause. The job is not physical work, which may have had a requirement of men to perform functions like lifting weights.

x. Irony lies in the fact that women of the house, mother and wife in general manage the daily worship of the deity at private temples in households. However, when the stage is a public institution, it is men who are acclaimed as capable enough to do the job**.** Similarly, cooking which is considered a woman's job, transforms into a man's job the moment it develops into an employment opportunity at restaurants.

## 4. THE CONSTITUTIONAL ASPECT

The preamble of our constitution secures to all its citizens: justice, liberty, equality, and fraternity. The aim of the Constitution is reflected by the enumeration of these ideals by the drafters. The Fundamental Rights enshrine the basic rights of every individual which cannot be waived. Article 14[16] declares "equality before the law" and "equal protection of the laws" to all people within the territory of India. Articles 15 and 16 protect against discrimination on the grounds of sex.[17] Further, Article 15(3) provides a special exception to women and children, allowing the State to make special provisions for them.[18]

J. Bhagwati has in the *Maneka Gandhi case* observed that "these fundamental rights represent the basic values cherished by the people of this country since the Vedic times and they are calculated to protect the dignity of the individual and create conditions in which every human being can develop his personality to the fullest extent."[19]

In *C.B. Muthumma* v. *Union of India*[20] , discrimination against women working in the Indian Foreign Service concerning the rules of the civil service was in issue. The petitioner was a senior member of the Indian Foreign Service and was illegally denied promotion to Grade I of the service. Rule 8(2) of the service rules required permission to

16 The Constitution of India.

17 *Ibid.*

18 *Ibid.*

19 *Maneka Gandhi v. Union of India,* (1978) 1 SCC 248, para 4.

20 (1979) 4 SCC 260.

be obtained from the government for the solemnization of marriage by a woman employee. Another rule states that no woman shall be entitled to be appointed to the service as of right. The court held that the two aforementioned rules were against the spirit of Articles 14 and 16 of the Constitution. The rules were subsequently deleted and she was promoted during the pendency of the litigation.

The court observed that they did "not mean to universalise or dogmatise that men and women are equal in all occupations and all situations and do not exclude the need to pragmatise where the requirements of particular employment, the sensitivities of sex or the peculiarities of societal sectors or the handicaps of either sex may compel selectivity. But save where the differentiation is demonstrable, the rule of equality must govern."[21] The observation of the court is important when we discuss the work of women working as priests in the Hindu temples which does not involve hard labour or is of a nature that otherwise incapacitates women from performing it. Women should be given their long-due share in things like these where they are restricted for superficial reasons.

In the *Anuj Garg case*[22], the constitutionality of section 30 of the Punjab Excise Act, 1914 was challenged which prohibited the employment of any man below the age of twenty-five years and any woman at any place where liquor or other intoxicating substance was consumed by the public. The court observed that both the bars against employment were unconstitutional and were drafted at a time when the concept of equality between the sexes was unknown.[23] The court further observed that the case cannot be considered as one falling within the realm of protective discrimination since the classification cannot be said to be based on rational criteria in the 21st century when women have gained entry into all spheres of public life.[24]

In *Charu Khurana* v. *Union of India,*[25] the bylaws of Cine Costume, Make-up Artists, and Hair Dressers Association, a registered trade union had restricted membership of the association only to men. The Act, however, had made no distinction between men and women. This was held to be violating Article 21 of the Constitution. Expressing her views on her suffering Charu Khurana had said[26], "Women can go into space, they can become doctors, they can do anything but they weren't allowed to become make-up artists!" These

21 *Id.*, para 7.

22 *Anuj Garg v. Hotel Assn. of India,* (2008) 3 SCC 1.

23 *Id.*, para 21.

24 *Id.*, para 26.

25 AIR 2015 SC 839.

26 Tanmaya Nanda, "Charu Khurana shatters 100-year-old Bollywood glass ceiling", *Business Standard,* Apr. 23, 2015, *available at:* http://www.business-standard.com/article/opinion/charu-khurana-shatters-100-year-old-bollywood-glass-ceiling-115042200261_1.html (last visited on February 25, 2024).

attempts to exclude women from certain professions reflect that men don't want women to enter into jobs because it increases competition for them in the job market. And, giving reasons like women experience periods of impurity is an easy way to keep them away from the profession of priesthood.

In another case[27], the Apex Court directed the Army to grant permanent commissions to eligible women who had served in the short service commission in any specialization of their choice similar to their male counterparts. Appointment to permanent commission enables them for pension, promotion, and other financial benefits. Earlier, there was a blanket restriction on these women officers from joining the higher posts. Also, their appointment was limited only to 'staff appointments'.

The Supreme Court in the *Hotel Priya case*[28] struck down as unconstitutional a requirement under the Maharashtra Licensing Rules[29] for restaurants and bars which held orchestra performances at their premises. The impugned provision imposed a gender cap on the maximum number of men and women who were permitted to be present on the stage. The court observed that the provision was void. The upper limit of performers cannot exceed eight; however, the specification of the maximum number of performers could be from any gender.

Article 25(2)(b) states that "the State shall provide for social welfare and reform or the throwing open of Hindu religious institutions of a public character to all classes and sections of Hindus." [30] The lower caste gets the right to become a priest from here. The same principle of equality could be applied here to accept that even women have the right to become priests.

### 4.1 Temples Fall Under The Category Of State

Temples accessible to the public are established as trust property in the name of the deity (like the Shree Siddhi Vinayak Ganapati Temple Trust (Prabhadevi) Act, 1980[31] to provide for management by a committee. This is done to enable the Trust to undertake wider welfare activities for the public**.** And, the members and employees of the trust are deemed to be public servants as per Article 12 of the Constitution of India.[32]

27 *Ministry of Defence v. Babita Puniya*, (2020) 7 SCC 469.

28 *Hotel Priya v. State of Maharashtra*, (2022) SCC 204.

29 Licensing and Performance for Public Amusement including Cabaret Performance, Melas, and Tamashas Rule, 1960 framed under the Maharashtra Police Act, 1951.

30 *Supra* note 16.

31 Shree Siddhi Vinayak Ganapati Temple Trust (Prabhadevi) Act, 1980 (Act 6 of 1981).

32 The Constitution of India, art. 12.

# 5. THE BEGINNING OF A REFORM AND SHIFT IN THE PARADIGM

The leaders of Shankaracharya orders have initiated women as ascetics. Ramakrishna, a famous nineteenth-century religious mystic, authorized his wife to administer mantras. Lala Devraj, an early twentieth-century Arya Samaj leader, educated young girls to recite *vedic* mantras and perform *vedic* fire rituals which had hitherto been the province of twice-born men.[33] Raja Ram Mohan Roy advocated for the liberty of women and worked for the elimination of the practice of *sati*. He introduced the Brahmo Samaj religion and worked for widow remarriage, the abolition of polygamy, and the promotion of education of girls. His work is described as one of the first movements of feminism in India. Rama Krishna Sarda Mission has been established as per his ideals. The institution is a centre for education and training for women.

## 5.1 Temples With Women Priests

Some temples in India have female priestesses as a custom. The Mannarasala Sree Nagaraja Temple in Kerala has always had a female as the supreme priestess as per the tradition and rituals. Arulmigu Adhiparasakthi Siddhar Peetam in Tamil Nadu is another Hindu temple in the country where a female priestess (called *'amma'*) offers prayers to the female deity and performs daily rituals at the temple. Women have been officiating as priests at the Guntigangamma temple of the mother goddess in the Prakasam district of Andhra Pradesh for many generations.[34]

Mangalore Gokarnanath temple has seen major reform in this respect. Two Dalit women were appointed as priests in Mangalore's Sri Gokarnanatha temple[35] in 2014 by Congress leader Janardhan Poojary. A 900-year-old Hindu temple in the city of

33 Arvind Sharma and Katherine K. Young (eds.), *Feminism and World Rights*, 29 (State University of New York, Albany, 1999), *available at:* https://books.google.co.in/books?id=OGxL4YCX4AYC&printsec=frontcover&source=gbs_ViewAPI&redir_esc=y#v=onepage&q&f=false (last visited on February 25, 2024).

34 S. Murali, "Woman priests have pride of place here", *The Hindu*, Feb. 19, 2016, *available at:* https://www.thehindu.com/news/national/andhra-pradesh/woman-priests-have-pride-of-place-here/article8255069.ece#:~:text=Even%20as%20controversy%20rages%20over,Guntigangamma%20temple%20in%20Prakasam%20district. (last visited on February 24, 2024).

35 Gururaj A.Paniyadi, "Dalit women become priests in Mangalore's Sri Gokarnanatha temple",*Deccan Chronicle Sep*. 30, 2014, *available at:* http://www.deccanchronicle.com/140930/nation-current-affairs/article/dalit-women-become-priests-mangalores-sri-gokarnanatha-temple (last visited on February 25, 2024).

Pandharpur in Maharashtra has appointed a woman as a priest.[36] She was selected from the 129 candidates who had applied for the job. Three Dalit women were appointed as Assistant Priestesses at Sri Vaishnava temples in Tamil Nadu after completion of a State-run training program.[37] Twenty-two women priests have completed two-year-long training for Hindu priests in Kerala.[38] In the year 2000, ten young Brahmin girls received their *upanayana* (the sacred thread ceremony) and were initiated into the Gayatri Mantra by their fathers defying the gender norms.[39] In 2019, women priestesses in Kolkata married a couple which made headlines. Later, in 2021, they presided over the Durga pooja rituals in the country[40]. Acceptance of women priests seems to be greater in the southern part of the Indian subcontinent. Other parts may soon follow suit.

## 6. CONCLUSION AND SUGGESTIONS

"Feminism isn't about making women strong. Women are already strong. It's about changing the way the world perceives that strength." —G.D. Anderson

We understand that the appointment of women as priests in temples, or the acceptance of women as *purohits* or *pundits* stands on the same footing as the women in Permanent Commissions in the Indian army. Women are attaining the requisite knowledge to qualify for jobs, the problem is the acceptance by society. It is observed that they are emerging stronger than before. And they have become stronger not only in terms of educational capabilities but also in terms of their willpower. They are becoming aware of their rights after facing years of suppression. Increasing educational empowerment is an indicator of progress, but there is still a lot to be achieved.

36 Feelix Lobo, "India's female Hindu priests challenge age-old tradition", Aug. 8, 2014, *available at:* https://www.ucanews.com/news/indias-female-hindu-priests-challenge-age-old-tradition/71626 (last visited on February 25, 2024).

37 "Tamil Nadu Govt Appoints 3 Women Priests In Hindu Temples, CM MK Stalin 'Hails New Era Of Inclusivity And Equality", *Outlook*, Sept. 15, 2023, *available at:* https://www.outlookindia.com/national/tamil-nadu-witnessed-officiation-of-three-female-priests-under-the-dravidian-model-of-governance-mk-stalin-news-318117 . (last visited on May 02, 2024).

38 Arjun Raghunath, "Kerala women Hindu priests look forward to Tamil Nadu model reforms", *Deccan Herald*, Oct. 16, 2021, *available at:* https://www.deccanherald.com/india/kerala-women-hindu-priests-look-forward-to-tamil-nadu-model-reforms-1041212.html (last visited on May 02, 2024).

39 Available at: https://www.australiancouncilofhinduclergy.com/uploads/5/5/4/9/5549439/female_hindu_priests.pdf (last visited on May 02, 2024).

40 Lauren Frayer, "Hindu priestesses fight the patriarchy, one Indian wedding at a time", *NPR*, Oct. 15, 2021, *available at:* https://www.npr.org/2021/10/15/1045954728/hindu-priestesses-indian-weddings (last visited on May 02, 2024).

The resistance faced by women pursuing to embrace priesthood and the hostile attitude of male priests towards their female counterparts needs to be eradicated, not only reduced. God loves His worshippers; regardless of their sex. Devotees like Meera and Gargi have been acknowledged in the Hindu mythology. We, therefore have a history of learned Hindu women who are an inspiration for the modern women of India. Jyotisree a woman *purohit* says[41], "Of course, people who are neck-deep in traditional beliefs tend to ask these questions. But then, answers follow only when questions are raised, and obstacles enable us to emerge stronger."

The education of our womenfolk in Hindu scriptures is the foremost requirement in our way to reach the goal. The government should take initiatives through the Ministry of Skill Development and Entrepreneurship and the Ministry of Women and Child Development to impart education and training programs to train women for the profession of priesthood. All issues impeding it in any way should be removed. Financial incentives in the form of scholarships should be given to encourage greater participation.

A law requiring a minimum percentage of women to be employed as priests could be passed. Public temples being established as trusts come under the category of State. Therefore, a law may be passed in this regard under Article 15(3)[42] of the Constitution reserving a certain percentage of posts of priests for women. It may however face resistance under Article 26(b)[43] which provides for a right to manage religious affairs by any section or religious denomination of people. But, it could be counter-argued that it is saved by providing for social reform as provided in Article 25(2) sub-clause (b). The initiatives undertaken in Kerala and Tamil Nadu for women and *Dalits* are applauded and should be followed in other states.

The initiative of the government in prescribing a mandatory inclusion of at least one woman director on the Board of every prescribed class of companies in India is laudable.[44] Mass campaigns should be organized to create awareness among people that women deserve equal respect and recognition as men. God has not distinguished between men and women. Worship and devotion by any of His creations is loved by Him.

41 Madhavi Tata, "The Oracles Of Devi", *Outlook*, Jan. 21, 2008, *available at:* https://www.outlookindia.com/magazine/story/the-oracles-of-devi/236548 (last visited on February 25, 2024).

42 *Supra* note 16.

43 *Supra* note 16.

44 The Companies Act, 2013 (Act 18 of 2013), s.149.