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**AN EMPIRICAL STUDY OF RISE IN COMMERCIAL SEXUAL EXPLOITATION  
(CSE) CASES AND IMPLEMENTATION OF LAWS IN THE STATE OF GOA**

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**Abstract**

An Empirical Study of Rise in Commercial Sexual Exploitation (CSE) Cases and Implementation of Laws in the State of Goa. The study focuses on the increasing cases of commercial sexual exploitation in Goa, particularly targeting women, and the implementation of laws to address this issue. It draws from a comprehensive literature review, including works by Kiran Bedi, Madhusudhana, Kumudini Achchi, and Arshad Hussain, to understand the root causes and contributing factors such as demand-driven trafficking, global trade, social, economic, and political compulsions, and lack of effective implementation of laws. The research methodology includes both doctrinal and non-doctrinal methods, with data collected from primary sources such as questionnaires and RTI filings. The study aims to analyze the present scenario of CSE in Goa and the effectiveness of laws in combating this issue. The findings highlight the vulnerability of women to trafficking and exploitation, the reasons for the rise in CSE cases, and the opinions of advocates, police, and the general public on the implementation of laws. The study concludes that trafficking is a severe violation of human rights and emphasizes the urgent need for stricter rules and regulations, enhanced awareness, and preventive measures to address the escalating CSE problem in Goa.

**Key Words:** CSE, RTI

**Introduction**

Women are a fundamental and most essential part of the society since ancient times. She is the foundation of the family and society. Based on the status and the freedom that a woman enjoys in the society progress of a country can be evaluated. They should have the same opportunities as men and shall enjoy the life with all the rights and attain development. But many men use and consider women as an object of entertainment and for pleasure since olden times. In olden times when child marriage was in existence women were deprived of the opportunity to get higher education and in some cases, girls did not even get primary education. This was the main cause for women being treated as slaves. There is wrong perception that women are born to be obey the orders of men and they can never raise a voice against the cruelties they are subjected to. One of the major groups considered most vulnerable to trafficking are Women. For purposes of sexual or commercial exploitation, women and girls are kidnapped, sold, and coerced by traffickers in almost every country in the world. Many human rights and governmental organizations agree that trafficking in women is a serious violation of human rights that needs to be fought but the complex and widespread operations of human trafficking make prosecution and punishment of traffickers impossible in many cases.

**Literature Review**

**Kiran Bedi (2005):** focused on the factors responsible for trafficking. It was observed that

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trafficking is demand driven which means demand increases the crime rate. It was found that poor enforcement of the law, illiteracy, lack of public awareness and awareness of rights, income disparities, lack of access to rights, existing customs are the major contributors for trafficking.

**Madhusudhana (2006):** A study to examine the spread of trafficking in India. In his opinion trafficking in women has become an organized crime. The results of his study indicated that global trade has increased substantially over a decade for trafficking. He observed that South Asia is the highest contributor to human trade, and it is important to identify the victims of trafficking and the reasons for their vulnerability. He also observed that social, economic, or political compulsions and customs make these victims vulnerable to exploiters.

**Kumudini Achchi (2010):** A study with the aim to understand whether the present laws are adequate in order to curb the problem of trafficking in women it was observed that even in the presence of number of laws the area of women trafficking is growing at an alarming rate due to lack of effective implementation of the laws as the crime of trafficking is not considered as a serious crime as other crimes the enforcement authorities also lack the interest in this issue .

**Arshad Hussain (2009):** Study aimed to find out the causes for the sexual harassment, exploitation and increasing crime against working women It was observed that the lack of sexual harassment laws, women fear losing their jobs with the fear of retaliation and sense of embarrassment hesitate to take any action and this makes women employees vulnerable. it is a larger problem of gender discrimination and violence.

### **Objectives**

1. To study the present scenario of Commercial Sexual Exploitation.
2. To study the major reasons leading to a rise in Commercial Sexual Exploitation in Goa.
3. To study the implementation of laws against Commercial Sexual Exploitation.

### **Research Methodology**

The methodology adopted by the researcher for this research work are ‘Doctrinal’ and ‘Non-Doctrinal’ method. For doctrinal method authoritative textbooks, magazines, newspaper reports, and reported cases are relied upon. For non-doctrinal method information is collected from the field study in which the advocates, police officials, general public consulted by using questionnaire. Information shall also be collected of registered cases of offences against women by filing RTI in police station.

### **Sources Of Data Collection**

For research work the following sources and tools are used: Primary Sources: It includes Questionnaires, Right to Information (RTI). Secondary Sources: It includes data collected from the Newspaper’s report, statistics provided by NGO, periodicals, e-book, internet.

### **Period of Study**

The primary data in the present study has been collected with the help of questionnaire from period commencing from 1<sup>st</sup> November 2023 to 31<sup>st</sup> January 2024 and by filing RTI.

### **Analysis and Interpretation**

A survey was conducted through Questionnaires to public, Advocates and Police authorities taking a sample of 20 each. They were asked various questions for their opinion relating to Commercial Sexual Exploitation in the state of Goa



**Table No.1: The Respondents for the Research**

Respondents	Number of Respondents
Advocates	20
Police	20
General public	20

**Source: Primary Data**

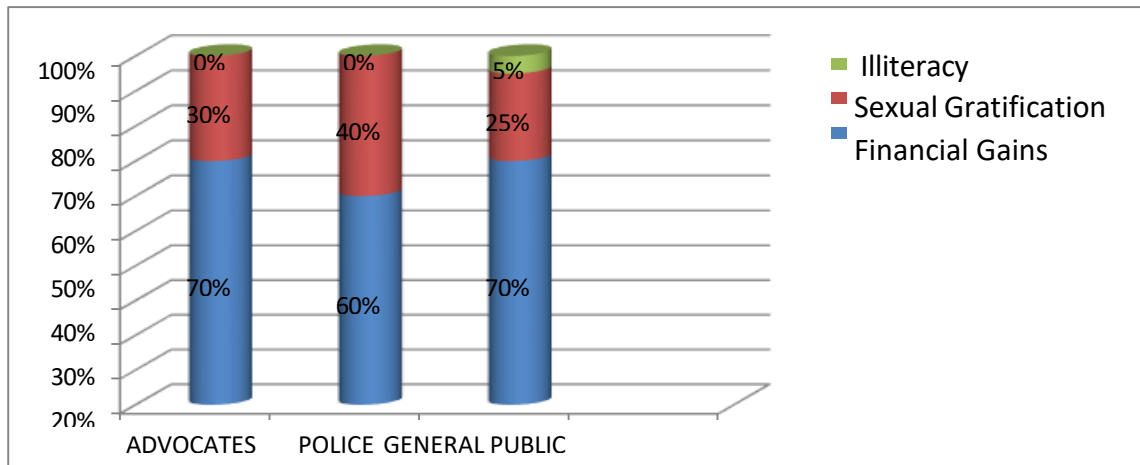
**Table No. 2: Common targets of commercial sexual exploitation (CSE)**

Respondents	Men	Women	Children	Total
Advocates	0	14	06	20
Police	0	12	08	20
General public	01	16	03	20

**Source: Primary Data**

Above table indicates common targets of commercial sexual exploitation. The respondents of the research have given their views on same. According to most respondents, women are the common targets for commercial sexual exploitation followed by children. 70% of Advocates opined that women are the major targets for commercial sexual exploitation whereas the remaining 30% stated commercial sexual exploitation is more in children. On the other hand, the police opinions are equal showing a percentage of 60% - 40%. in case of general public, the majority voted for women as being the common targets with 80% and only 5% stated that men are targets for CSE.

**Figure No: 1 Reason for (CSE)**



**Source: Primary Data**

The respondents were posed with a question regarding the major reason for commercial sexual exploitation in their opinion. As can be seen from above chart majority of the respondents are of the view that Financial Gains is one of the major reasons for rise in commercial sexual exploitation. In the opinion of 70% advocates, 60% of police and 70% of general public the major reason for increasing commercial sexual exploitation is for financial gains whereas in contrast about 30% of Advocates, 40% of police and 30% of general public think that there is rise in commercial sexual exploitation for sexual gratification. A small percentage of respondents think and specify that the reason for increasing CSE is illiteracy.

**Table No. 3: Reasons for Women fall pray for (CSE)**

Women fall pray due to	Respondents		
	Advocates	Police	General Public
Poverty	04	02	12
Unemployment	08	12	04
Child sexual abuse	02	02	01
Mental illness	00	00	00
Promotion of sexual exploitation by family/peers	06	04	03
TOTAL	20	20	20

**Source: Primary Data**

Fig No.2

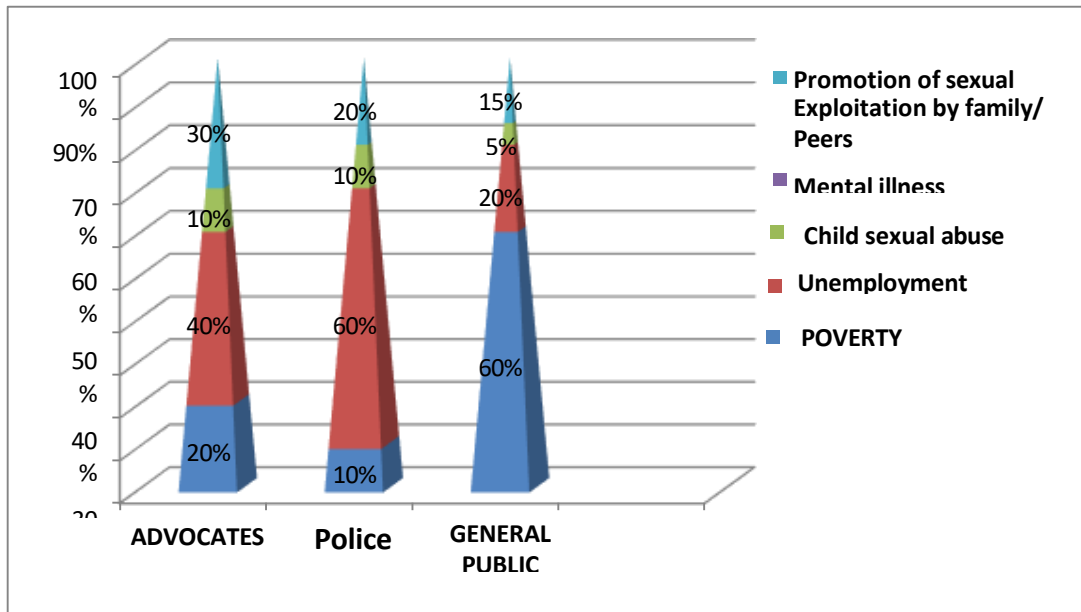


Table No. 3

The respondents were asked why women fall prey for commercial sexual exploitation. In the view of advocates unemployment is the major reason why women may fall pray for commercial sexual exploitation followed by poverty, promotion of sexual exploitation by family / peers with 30%, with 20%, and child sexual abuse with 10%. Similarly, 60% police opined that major reason being unemployment, 20% opined that promotion of sexual exploitation by family /peers is one of the major reasons, 10% of the police respondent stated poverty and another 10% were of the opinion that it is child sexual abuse. On the other hand, according to general public poverty is one of the major reasons why women fall prey to commercial sexual exploitation.

Table No. 4: Major reason for rise in (CSE)

Major reason for rise in CSE	Respondents		
	Advocates	Police	General Public
Poor implementation of Law	08	0	13
Customs and norms	0	0	0
Lack of employment opportunities	08	16	06
Any other (Political influence in administration)	0	0	01
Any Other (Illiteracy and Poverty)	04	04	0
TOTAL	20	20	20



**Source: Primary Data**

As can be seen from above table, according to the advocates about 40% think poor implementation of law is one of the major reasons why there is rise in cases whereas another 40% feel it is due to lack of employment opportunities to the people they become victims of CSE, and remaining thought the rise is due to illiteracy and poverty of people. On the other hand majority police are of the opinion that lack of employment opportunities is a major reason. In the opinion of general public, the major reason being the poor implementation of law there is rise in CSE cases in the state and few were of the opinion that illiteracy and poverty push women into CSE.

**Table No. 5: Awareness of Immoral Traffic Prevention Act (ITPA)**

Respondents	Yes	No	Total
General public	14	06	20

**Source: Primary Data**

General public were asked if they are aware about the IPT Act which punishes sexual exploitation of persons and trafficking of persons for commercial purpose. As can be seen in above pie chart 70% of the general public said they are aware about the ITP Act whereas remaining 30% had no knowledge about the ITP Act.

**Table No. 6: Effective Implementation of ITP Act in the State of Goa**

Respondents	Yes	No	Total
Advocates	10	10	20
Police	18	02	20
General public	03	11	14

**Source: Primary Data**

As can be seen from above table in the opinion of half of the advocates the Act is not implemented effectively whereas the remaining half think that the implementation of the Act is proper. On the other hand, the majority of police are of the opinion that Immoral Traffic (Prevention) Act is effectively implemented while a minority feels it is not implemented effectively. General public has no faith about implementation of the ITP Act.

**Table No. 7: Opinion on current laws against (CSE)**

Respondents	Laws are appropriate	Laws need to Be more stringent	Total
Advocates	12	08	20
Police	14	06	20





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General public	0	19	19
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**Source: Primary Data**

The above table illustrates the opinion of the respondents on laws to curb commercial sexual exploitation. 60% of advocates said that the current laws on curbing CSE are appropriate whereas 40% said the laws need to be more stringent in order to curb commercial sexual exploitation. On the other hand police are of the opinion that the current laws are appropriate while a few are of the opinion that laws should be made more stringent in order to curb CSE. By contrast the general public is of the opinion that the current laws are not appropriate and they need to be made more stringent.

**Findings of the Study**

The study shows that majority of the respondents believe women being the victims of CSE followed by children. Majority are of the view that Financial Gains is one of the major reasons for rise in commercial sexual exploitation whereas in contrast about 30% think that there is rise in commercial sexual exploitation for sexual gratification and small percentage of respondents think and specify that the reason for increasing CSE is illiteracy.

The study shows that unemployment is the major reason why women may fall pray for commercial sexual exploitation followed by poverty, promotion of sexual exploitation by family / peers, and child sexual abuse .

Study shows that major reason for rise in commercial sexual exploitation cases believed by majority respondents is poor implementation of Law whereas others opined its lack of employment opportunities followed by illiteracy as a reason for rise in cases.

Study shows that respondents are aware about existence of Immoral Traffic Prevention Act and but also believe Laws need to be more stringent. Also in RTI filed seeking information about number of cases of offences against women registered in last 5 years in south Goa in most parts of the south Goa the cases of offences against women had decreased during the mid period but they are again seen as increasing.

**Conclusions**

Trafficking is one of the worst kinds of abuse and exploitation of human beings and Women are considered as most vulnerable to trafficking and it is increasing.

Goa is one of the major tourists destinations and this tourism has created demand for sex trade and which has led to trafficking of human beings for CSE. Women and girl from different parts of the country are trafficked in Goa for CSE including the residents of this state are victims of the same. In order to study the problem data was collected and is analysed by adopting various charts and tables and it has been observed that CSE is on rise in the state of Goa women being the major targets of this immoral act. It is observed that major reason for CSE is Financial Gains . women fall pray for such evil either due to unemployment and poverty due to which they are unable to maintain their family and social life. There are lack of employment opportunities and in order to sustain their life and families life women in search of alternatives are trapped by traffickers. It is also observed that majority of people are aware about the Immoral Traffic Prevention Act ,



1956 and majority feel that the Act is implemented properly and it is also felt that rules need to be more stringent in order to curb the rising CSE in the state .

### **References**

- **BOOKS:**
- Prof. M P Jain , Indian Constitutional Law by, Fifth edition 2003, Reprint 2005, Wadhwa Nagpur.
- Ratanlal Dhirajlal, The Indian Penal Code, Universal law publishing as amended by the criminal amendment Act 2013 (13/13) 2015 publication of lexis nexis
  
- **WEBLIOGRAPHY :**
- <http://www.healthscotland.scot/media/2098/gbv-commercial-sexualexploitation.Pdf>
- <https://shodhganga.inflibnet.ac.in/bitstream/10603/202242/11/11%20chap%20-%204.pdf>
- <https://sexualexploitatio.weebly.com/history-of-human-trafficking.html>
- <https://blog.theexodusroad.com/causes-effects-of-human-trafficking>
- <https://www.un.org/womenwatch/daw/cedaw/>
- <https://www.ilo.org/newdelhi/whatwedo/publications/>