

Towards Equality: Gender – Neutral Legal Protection in Workplace Harassment

Neha Verma, Dr Naish Zameer

Department Law, Rabindranath Tagore University

DOI: <https://doi.org/10.47772/IJRISS.2026.100400177>

Received: 08 April 2026; Accepted: 13 April 2026; Published: 01 May 2026

ABSTRACT

This paper explores the under-addressed issue of sexual harassment of men in the workplace, emphasizing the tension between cultural norms and legal protections across different societies. Cultural attitudes often discourage male victims from reporting or recognizing their experiences as harassment. The paper examines case studies from varied legal and cultural settings, identifies barriers to effective redress, and offers a framework for multinational companies to implement culturally sensitive, legally compliant policies. Utilizing a mixed-methods approach, including surveys and in-depth interviews with male employees across urban and semi-urban settings, the study identifies key patterns of harassment, such as verbal abuse, inappropriate touching, and coercive behaviors, often perpetrated by both male and female colleagues or superiors. The findings highlight the societal and cultural barriers, including stigma and rigid masculinity norms, that discourage men from reporting such incidents. Additionally, the research evaluates the effectiveness of existing legal frameworks, like the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, in addressing male victims' grievances. The study underscores the need for gender-neutral policies, awareness campaigns, and organizational support systems to foster safer workplaces for men, contributing to a more inclusive understanding of workplace harassment in India.

Keywords: sexual harassment, cultural attitudes, mixed-methods approach, masculinity norms, gender-neutral policies.

INTRODUCTION

Sexual harassment is a pressing issue in today's globalized world. The International Labor Organization defines sexual harassment as a "sex-based behaviour that is unwelcome and offensive to its recipient. In India, the POSH Act was enacted in 2013 to provide a safe working environment for women at the workplace. Although it is a commendable task performed by the Government of India, yet it often lacks a crucial and neglected issue of men's safety at the workplace. Sexual harassment is defined as any unwelcome sexual conduct that creates a hostile or intimidating work milieu. The gap, coupled with societal expectations of masculinity discourages male victims from reporting incidents. Case study of Vijay Nair (2017), a Mumbai based entrepreneur highlights how men are also at risk by women playing victim card. Equal treatment at workplace is covered under the ambit of the Fundamental Rights and the Directive Principles of State Policy guaranteed under the Constitution of India. Job opportunities, financial gain and potential for promotion are things that workers seek from employment. However sexual harassment at workplace makes the achievability of all these things difficult.

Workplace sexual harassment has long been recognized as a serious violation of human dignity and equality, traditionally framed within the context of protecting women from gender-based misconduct. While this focus has been crucial in addressing systemic inequalities, it has also contributed to a narrower legal and social understanding of harassment that often overlooks male victims. In recent years, there has been a growing recognition that sexual harassment is not exclusively experienced by women and that men, too, can be subjected to unwelcome sexual conduct, coercion, and hostile work environments. This evolving awareness calls for a critical reassessment of existing legal frameworks through the lens of gender neutrality.

Gender neutrality in law seeks to ensure that legal protections are applied equally, regardless of gender, thereby acknowledging that vulnerability to harassment is not confined to one sex. However, many workplace harassment laws across jurisdictions remain either explicitly gender-specific or implicitly biased in their interpretation and enforcement. As a result, male victims frequently face legal gaps, social stigma, underreporting, and limited institutional support. These barriers not only hinder access to justice but also perpetuate harmful stereotypes about masculinity and victimhood.

This research paper examines the necessity and implications of adopting gender-neutral approaches in workplace sexual harassment laws, with a particular focus on addressing the experiences of male victims. It analyzes existing legal provisions, identifies shortcomings in their application, and explores how a more inclusive legal framework can better uphold principles of equality, dignity, and justice in the modern workplace. By situating the discussion within broader debates on gender, power, and law, this study aims to contribute to a more comprehensive and equitable understanding of workplace harassment.

Historical Background

The term ‘Sexual Harassment’ was defined for the first time in India in *Vishaka Vs. State of Rajasthan*. Prior to *Vishaka’s* guidelines in 1997, there was no remedy for sexual harassment at workplace. The historical background of gender-neutral laws in India reflects a complex interplay of social, cultural, legal, and political factors, rooted in the country’s patriarchal traditions, colonial influences, and evolving constitutional principles. In ancient India, laws were largely derived from social customs and religious texts like the Dharmashastras (e.g., Manusmriti), which were heavily patriarchal and gender-specific. These texts prescribed rigid roles for men and women, often marginalizing women and non-binary genders. However, communities like the Hijra (transgender individuals) held respected roles in certain cultural and religious contexts, such as during the Vedic and Mughal periods, serving as advisors or performers in royal court. Despite patriarchal dominance, historical texts like the Mahabharata and Ramayana reference non-binary or transgender figures (e.g., Shikhandi), indicating some acknowledgment of gender diversity in ancient Indian society. Arjuna in Mahabharata, at one point of time has to disguise himself as Brihanalla, a dancer. Coming to the Colonial laws, including those on marriage, inheritance, and property, reinforced gender disparities, often treated women as property and ignored non-binary genders. Rape laws under Section 375 of the IPC were framed to protect women’s “honor” rather than their autonomy, assuming men as perpetrators and women as victims. The Indian Constitution (1950) laid a foundation for gender equality through Articles 14 (equality before the law), 15 (non-discrimination on grounds of sex), and 16 (equal opportunity in public employment). These provisions implicitly supported gender neutrality by emphasizing equality for all citizens, but their application was initially limited by societal biases. Protections against workplace harassment were designed to address women’s vulnerabilities in a patriarchal society, reflecting a focus on gender-specific rather than neutral laws. The 172nd Law Commission Report (2000) was a pivotal moment, recommending gender-neutral laws to include male and transgender victims. This was not implemented due to resistance from feminist groups, who argued that gender-specific laws were necessary to protect women in a patriarchal society. The *National Legal Services Authority v. Union of India* (2014) judgment was a landmark, recognizing transgender individuals as a “third gender” with equal rights under the Constitution. The Transgender Persons (Protection of Rights) Act, 2019, further prohibited discrimination and provided for self-identification, marking a step toward gender-neutral protections. The Supreme Court’s *Navtej Singh Johar v. Union of India* (2018) decision struck down parts of Section 377, decriminalizing consensual same-sex relations and affirming the rights of the LGBTQ+ community, indirectly supporting gender-neutral legal frameworks. While Section 112 of the *Bhartiya Nyaya Sanhita* provides gender-neutral protections against domestic violence, Section 63 (rape) remains gender-specific, excluding male victims.

LITERATURE REVIEW

Sexual harassment in the workplace has been extensively studied within the broader framework of gender discrimination, power dynamics, and organizational behaviour. Traditionally, the literature has focused predominantly on women as victims, reflecting both the higher reported prevalence and the historical context of gender inequality. However, emerging scholarship highlights the limitations of this gender-specific approach and calls for a more inclusive, gender-neutral understanding of workplace harassment.

Early literature conceptualizes sexual harassment primarily in two forms: quid pro quo harassment and hostile work environment, both of which have significant psychological, economic, and professional consequences for victims. These studies emphasize that harassment adversely affects productivity, mental health, and organizational efficiency, thereby making it a critical issue for both employees and employers. While these foundational works acknowledge that men can also be victims, they often treat such cases as peripheral rather than central to the discourse.

More recent systematic reviews have expanded the scope of analysis by examining workplace harassment across genders. For instance, a comprehensive review of studies published between 2010 and 2019 demonstrates that sexual harassment is a global organizational issue influenced by hierarchical power relations, workplace culture, and gender dynamics. Importantly, this body of research recognizes that although women constitute the majority of reported victims, men also experience harassment, often in underreported and understudied contexts.

Contemporary literature increasingly focuses on the experiences of male victims, highlighting significant gaps in both research and legal frameworks. A 2024 review on violence against men in workplace contexts underscores that male victimization remains comparatively neglected despite evidence of its prevalence. The study identifies social stigma, gender stereotypes, and inadequate institutional support as key factors contributing to underreporting among men. These findings suggest that societal expectations of masculinity often discourage men from acknowledging or reporting harassment, thereby reinforcing their invisibility within legal and academic discourse.

Scholars have also explored the role of gender norms and power structures in shaping experiences of harassment. Contemporary theoretical frameworks argue that sexual harassment is less about sexual desire and more about dominance, control, and reinforcement of hierarchical power relations. This perspective is crucial in understanding why men, particularly those in subordinate positions or gender-atypical roles, may also become targets of harassment. Additionally, studies indicate that individuals working in gender-minority environments—such as men in female-dominated professions—may face increased vulnerability to harassment.

Another significant strand of literature examines the psychological and organizational impact of workplace harassment on victims irrespective of gender. Research indicates that both male and female victims experience stress, anxiety, reduced job satisfaction, and diminished work performance. However, male victims often encounter unique challenges, including disbelief, trivialization of their experiences, and lack of tailored support mechanisms. These barriers further complicate access to justice and reinforce the need for inclusive legal protections.

Despite growing recognition of male victimization, legal scholarship points to persistent gender biases in workplace harassment laws. Many legal frameworks are either explicitly gender-specific or implicitly interpreted through a female-centric lens, thereby excluding or marginalizing male experiences. This has led to increasing academic advocacy for gender-neutral legislation that recognizes harassment as a violation of individual dignity rather than a gender-specific issue.

In summary, the existing literature reveals a gradual shift from a women-centric understanding of workplace sexual harassment toward a more inclusive framework that acknowledges male victims. However, significant gaps remain in both empirical research and legal analysis. There is a clear need for further scholarly attention to gender-neutral legal approaches that address the complexities of harassment across all genders, particularly in relation to male victimization in the workplace.

METHODOLOGY

This research adopts a **doctrinal and analytical research methodology** to examine the adequacy of existing workplace sexual harassment laws in addressing the experiences of male victims and to evaluate the need for gender-neutral legal frameworks.

Research Design

The study is primarily **qualitative in nature**, relying on the analysis of legal texts, judicial decisions, and scholarly literature. A doctrinal approach is employed to interpret statutory provisions and legal principles governing workplace sexual harassment, while an analytical framework is used to critically assess their scope, limitations, and gender inclusivity.

Sources of Data

The research is based on **secondary data**, collected from a wide range of authoritative sources, including:

- **Legislation and Legal Frameworks:** Examination of existing workplace sexual harassment laws, with particular attention to gender-specific provisions and their implications for male victims.
- **Judicial Pronouncements:** Analysis of relevant case law to understand how courts have interpreted and applied sexual harassment laws in cases involving male victims or gender-neutral claims.
- **Academic Literature:** Review of books, peer-reviewed journal articles, and research papers addressing sexual harassment, gender theory, and workplace discrimination.
- **Reports and Policy Documents:** Study of reports published by governmental and non-governmental organizations on workplace harassment and gender equality.

Comparative Approach

A **comparative legal analysis** is undertaken to examine how different jurisdictions have approached gender neutrality in workplace sexual harassment laws. This includes comparing gender-specific frameworks with gender-neutral models to identify best practices and gaps in legal protection.

Analytical Framework

The study applies a **gender-neutral and rights-based perspective**, focusing on principles such as equality, non-discrimination, and human dignity. It critically evaluates whether existing laws align with these principles and adequately protect all individuals, regardless of gender.

Scope and Limitations

The research is limited to **secondary data analysis** and does not include empirical methods such as surveys or interviews. While this allows for an in-depth legal and theoretical examination, it may not fully capture lived experiences of victims. Additionally, the study focuses primarily on formal workplace settings and may not extend to informal or unregulated sectors.

Objective of Methodology

The methodological approach aims to:

- Identify gaps in existing sexual harassment laws concerning male victims
- Assess the effectiveness of gender-neutral legal frameworks
- Propose recommendations for more inclusive and equitable legal reforms

Legal Provisions

The POCSO Act is the only act that is gender-neutral and protects all children (below 18 years) from sexual harassment, assault, and pornography. It covers boys and non-binary children, defining offenses like sexual

harassment (Section 11) in a way that applies to any perpetrator or victim, regardless of gender. This is one of the few explicitly gender-neutral laws in India, but it applies only to minors, leaving adult men without equivalent protections. The Indian Penal Code Section 377 (criminalizing non-consensual sodomy) recognizes men as victims of sexual assault but is irrelevant when the perpetrator is a woman. This section criminalizes non-consensual "carnal intercourse against the order of nature" with any man, woman, or animal, punishable with imprisonment up to seven years or life, and a fine. Its drawback is that The Bhartiya Nyaya Sanhita (BNS), 2023, which replaced the IPC, removed Section 377, leaving men and trans men without specific protections against non-consensual sexual acts previously covered under this section. Various surveys and reports indicate that 19–51% of men in Indian metros have experienced workplace sexual harassment, yet the lack of legal provisions discourages reporting. A 2013 Viacom 18 survey found that 43% of male corporate professionals in India reported sexual harassment by colleagues. An Economic Times-Synovate survey reported 19% of 527 men across metros faced workplace harassment, with 51% in Bangalore. Fear of social ridicule and lack of legal recourse lead to significant underreporting. Movements like #MeToo have encouraged some men to speak out, increasing reporting by 18%. Countries like the United States address sexual harassment through gender-neutral laws, such as Title VII of the Civil Rights Act of 1964, which prohibits workplace discrimination based on sex. India could adopt a similar approach by amending the POSH Act to include all genders. By adopting gender-neutral laws, establishing independent tribunals, and raising awareness, India can create a safer environment for all, aligning with its constitutional mandate and international human rights standards.

As we have helplines for women in India, we must have for male as well or have a common help line where both men and women might get help when facing issues related to harassment or feeling of being unsafe due to presence of certain people or being in a certain place where they might be prey of unnatural lust. Cases of male sexual harassment is as sensitive as women sexual harassment and must be treated with equal sensitivity, care and due respect. Creating a special bench might help to deliver justice a little sooner and, in an environment, where the victims might feel free to speak about their encounter and problems faced. In today's time no one is one hundred percent safe but everyone has right to seek justice and protect themselves from the wrong doers. In short "unnatural lust sees no gender". Some women's rights groups argue that focusing on male victims could divert attention from the systemic patriarchy-driven harassment of women. However, advocates for gender-neutral laws stress that addressing all victims strengthens justice systems without undermining women's protections.

Balancing Cultural and Legal Diversity

Balancing cultural and legal diversity when addressing sexual harassment of men in the workplace is a complex but essential task, especially in global or multicultural environments. Sexual harassment laws and cultural norms vary widely across countries and communities. Some nations have robust, gender-neutral protections; others have limited or no legal recognition of male harassment. In some societies, male vulnerability is stigmatized, making it harder for men to report harassment or be taken seriously. To effectively address the issue, especially in international or cross-cultural workplaces, organizations must bridge both legal compliance and cultural sensitivity. In short, addressing sexual harassment in the workplace involves acknowledging and respecting cultural diversity while maintaining legal uniformity. Striking a balance between these two aspects is crucial for creating a work environment that promotes equality, inclusivity, and the well-being of all employees, regardless of gender. From various cases around the world, it is learnt that male victims must be encouraged to report incidents promptly to enable swift action. In many cases, delayed reporting can make investigations challenging.

Countries like United States of America, United Kingdom, Australia and New Zealand have gender neutral laws for sexual harassment at workplace providing protection to all the victims of sexual harassment at workplace irrespective of their gender. India still ironically believes that victimization from sexual harassment at workplace is limited to women only. "Right now, we have one sided law and I totally agree that there is an earnest need to have a Gender-Neutral law on sexual harassment at workplace and in fact there is also a need of stricter law for false allegation against a man, because dignity of a women should not outweigh dignity of a man."

Shri Pradeep Chaddah, Retired District Judge, New Delhi

Gender Neutrality Bill – 2019

The Criminal Law (Amendment) Bill, 2019, introduced as a private member's bill in the Rajya Sabha by Senior Advocate KTS Tulsi, aimed to make criminal laws, particularly those related to sexual offences, gender-neutral. The bill sought to amend the Indian Penal Code (IPC), Criminal Procedure Code (CrPC), and Indian Evidence Act which has been replaced by Bhartiya Nyaya Sanhita, Bhartiya Nagrik Suraksha Sanhita and Bhartiya Sakshya Adhiniyam to make sexual offence laws gender-neutral, recognizing men, women, and transgender individuals as both potential victims and perpetrator. It proposed gender-neutral provisions for crimes like rape, sexual harassment, stalking, voyeurism, and outraging modesty, replacing terms like "man" and "woman" with "any person." The bill remains pending, reflecting slow legislative progress due to societal resistance, concerns about misuse, and prioritization of women-centric laws amid high rates of violence against women. Critics, including feminist groups, argued it might undermine protections for women, while supporters emphasized inclusivity and equality. The Bharatiya Nyaya Sanhita Bill, 2023, later incorporated some gender-neutral provisions, but it also awaits enactment.

RESULTS AND DISCUSSION

Findings of the Study

The analysis of legal frameworks, judicial interpretations, and existing literature reveals several key findings regarding the treatment of male victims in workplace sexual harassment laws:

a. Gender-Specific Nature of Existing Laws

The study finds that many workplaces sexual harassment laws, particularly in jurisdictions like India, remain **explicitly gender-specific**. For instance, legislation is often framed to protect women, thereby excluding men from direct legal remedies. This creates a structural gap where male victims must rely on indirect provisions such as general workplace misconduct rules or criminal law, which may not adequately address the nuances of sexual harassment.

b. Underreporting and Social Stigma

A consistent finding across the literature is the **significant underreporting of sexual harassment by men**. Social expectations surrounding masculinity discourage men from acknowledging victimhood, leading to silence and lack of formal complaints. This underreporting further reinforces the misconception that workplace sexual harassment is a gender-exclusive issue.

c. Lack of Institutional Mechanisms for Men

Unlike frameworks designed for women, organizational policies and redressal mechanisms often lack **clear procedures for male complainants**. Internal complaints committees and workplace policies may not explicitly recognize men as potential victims, resulting in limited access to support systems.

d. Judicial Ambiguity

Judicial responses to male victimization are relatively sparse and often inconsistent. Courts in some jurisdictions have adopted broader interpretations of equality and dignity, but there is no uniform legal stance that explicitly recognizes the need for gender-neutral protection.

e. Emerging Shift Toward Gender Neutrality

Despite these gaps, the research identifies a **gradual shift in academic discourse and policy recommendations** toward gender-neutral laws. Some jurisdictions and organizations have begun adopting inclusive policies that recognize harassment as a violation of individual rights rather than a gender-specific harm.

DISCUSSION

The present study highlights a fundamental shift in the understanding of workplace sexual harassment—from a traditionally women-centric issue to a broader human rights concern that can affect individuals of any gender. While historical legal frameworks were designed to address systemic discrimination and violence against women, the findings of this research demonstrate that such gender-specific approaches, though necessary in their time, are increasingly inadequate in addressing the complexities of modern workplace dynamics.

One of the central issues emerging from this analysis is the **exclusion of male victims from explicit legal protection** in several jurisdictions. Laws that are framed solely around the protection of women risk creating a legal vacuum for men who experience similar forms of harassment. This exclusion not only limits access to justice but also reinforces the stereotype that men cannot be victims of sexual harassment. Such assumptions are inconsistent with contemporary research, which shows that men, too, can experience unwelcome sexual conduct, coercion, and hostile work environments, often with comparable psychological and professional consequences.

The discussion also underscores the role of **societal norms and constructions of masculinity** in shaping the experiences of male victims. Cultural expectations often discourage men from reporting harassment due to fear of ridicule, disbelief, or damage to their professional reputation. This leads to significant underreporting, which in turn perpetuates the invisibility of the issue within both legal discourse and organizational policy. As a result, male victimization remains underrecognized, further justifying the continuation of gender-specific frameworks.

Another important dimension is the **institutional inadequacy of workplace mechanisms**. Many organizations have established internal complaint systems in compliance with legal requirements; however, these systems are frequently designed with a singular focus on female victims. The absence of gender-neutral language and procedures can deter male employees from seeking redressal, thereby undermining the effectiveness of such mechanisms. A more inclusive institutional approach is necessary to ensure that all employees feel protected and supported.

From a theoretical standpoint, the study reinforces the argument that sexual harassment is fundamentally an expression of **power imbalance and abuse**, rather than purely a gendered phenomenon. Power hierarchies based on position, authority, or organizational structure often play a decisive role in enabling harassment. This perspective supports the case for gender-neutral laws, as it shifts the focus from the identity of the victim to the nature of the conduct itself.

However, the move toward gender neutrality must be approached with caution. A key concern raised in academic and policy debates is that neutral laws may inadvertently dilute the specific protections afforded to women, who continue to face disproportionate levels of harassment. Therefore, the challenge lies in designing legal frameworks that are **inclusive without being insensitive to existing inequalities**. This may involve adopting gender-neutral language while retaining provisions that acknowledge and address structural disadvantages faced by women.

Furthermore, legal reform alone is insufficient to address the issue comprehensively. The effectiveness of gender-neutral laws depends on **implementation, awareness, and cultural change** within organizations. Training programs, sensitization initiatives, and clear reporting mechanisms are essential to ensure that employees understand their rights and feel empowered to report misconduct. Without such supportive measures, even the most progressive legal frameworks may fail to achieve their intended impact.

In conclusion, the discussion emphasizes that adopting gender-neutral approaches to workplace sexual harassment laws is not merely a matter of legal reform but a step toward a more equitable and inclusive understanding of workplace rights. Recognizing male victims within this framework does not diminish the struggles faced by women; rather, it strengthens the overall commitment to dignity, equality, and justice for all individuals in the workplace.

CONCLUSION

This research has examined the limitations of existing workplace sexual harassment laws in addressing the experiences of male victims and has highlighted the growing need for gender-neutral legal frameworks. While historically women-centric laws have played a crucial role in combating systemic discrimination and providing necessary protections, their continued exclusivity has resulted in significant legal and institutional gaps for men who experience similar forms of harassment.

The study finds that male victims often remain underrecognized and underserved due to a combination of gender-specific legislation, social stigma, and inadequate workplace mechanisms. The persistence of traditional notions of masculinity further discourages reporting and reinforces the misconception that sexual harassment is a gender-exclusive issue. Consequently, many male victims are left without effective remedies, undermining the broader principles of equality and justice that such laws are intended to uphold.

By analyzing legal provisions, scholarly discourse, and institutional practices, this research underscores that sexual harassment is fundamentally an issue of power imbalance, abuse, and violation of dignity, rather than one confined to a particular gender. This understanding provides a strong foundation for advocating gender-neutral approaches that recognize and protect all individuals, irrespective of gender identity.

However, the transition toward gender neutrality must be undertaken with careful consideration. It is essential to ensure that expanding legal protections to include men does not dilute the safeguards currently available to women, who continue to face disproportionate risks of harassment. A balanced and inclusive framework should therefore aim to extend protections without eroding existing protections, thereby strengthening the overall effectiveness of workplace harassment laws.

In conclusion, the adoption of gender-neutral sexual harassment laws represents a necessary evolution in legal thinking, aligning with contemporary principles of equality, non-discrimination, and human dignity. Such reforms, when supported by effective implementation, awareness initiatives, and organizational accountability, can contribute to creating safer and more inclusive workplaces. Ultimately, recognizing male victimization within the legal framework is not a departure from the goals of justice, but rather a reaffirmation of the commitment to protect the rights and dignity of all individuals in the workplace.

REFERENCES

1. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act). Government of India.
2. The Protection of Children from Sexual Offences Act, 2012 (POCSO Act). Government of India.
3. The Indian Penal Code, 1860. Government of India. Section 377 (repealed by Bharatiya Nyaya Sanhita, 2023).
4. The Bharatiya Nyaya Sanhita, 2023 (BNS). Government of India.
5. The Criminal Law (Amendment) Bill, 2019. Introduced by KTS Tulsi in Rajya Sabha.
6. Chakravarti, U. (1993). "Conceptualising Brahmanical Patriarchy in Early India: Gender, Caste, Class and State." *Economic and Political Weekly*, 28(14), 579–585.
7. Bhasin, K. (2000). *Understanding Gender*. New Delhi: Kali for Women.
8. Agnes, F. (2015). "Law, Patriarchy, and the Indian Women's Movement." *Indian Journal of Gender Studies*, 22(2), 255–274.
9. Menon, N. (2012). *Seeing Like a Feminist*. New Delhi: Zubaan.
10. Dube, L. (1988). "On the Construction of Gender: Hindu Girls in Patrilineal India." *Economic and Political Weekly*, 23(18), WS11–WS19.
11. Vijay Nair Case (2017). Covered in Indian media outlets like *The Times of India* and *India Today*. (search archives for 2017).
12. #MeToo Movement in India. (2018–2020). Covered in *The Hindu*, *The Indian Express*, and global outlets like *The New York Times*.