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Holy Men, Unholy Deeds: Examining Sexual Misconduct in Religious Institutions

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This Article uncovers how religious leaders misuse their power to exploit the weak people sexually in religious institutions. These leaders betrayed their followers' trust and belief by sexually exploiting them. This incident is a burning issue that is not limited to one religion or country but is also a global issue. The article not only covers the notable high-profile leading cases of India but also covers the global incidents regarding the topic of sexual exploitation in religious institutions by religious leaders. These leaders manipulate the victims by telling them that the sexual act is a divine act and through this, they will get salvation, Also, they force the victims to cut down all their relations with their family, friends, and outsiders. However, religious institutions from the very past times covered up these scandals to protect the reputation and social dignity of the institutions. The article also discusses the legal framework of India to fight against this kind of crime, including the Indian Penal Code, Bharatiya Nyaya Sanbita, POCSO Act, Juvenile Justice Act, etc. Despite these statutes, many of them escape from the justice system by suppressing the victims and destroying the evidence, and the victims often suffer from mental and physical trauma. In conclusion, the article discusses how religious institutions must confront and expose these crimes openly rather than covering them if they want to regain their public trust and faith, and the Government has to keep monitoring these religious leaders and enforce strict legal actions when these types of crimes happen.

Keywords: sexual exploit, dignity, salvation, religious, expose.

INTRODUCTION

From ancient times, Religious places and Institutions have been used to advise and guide people towards spirituality. However, over the years, people believe that these religious institutions enlighten them and guide them successfully towards Spirituality. But over the past few years, numerous scandals have emerged and exposed the darker side of these institutions, where the religious leaders and saints misuse their powers and position to fulfill their unnatural sexual pleasure, sexual exploitation, sexual abuse, and women trafficking. However, these types of incidents are increasing day by day globally and in India.

This issue is not limited to one religion or faith, now, it is becoming a global crisis affecting people's religious faith and also defaming their religion, their culture, and their nation. The immense religious faith and trust in the religious leaders led them to engage in sexual exploitation. Just because the victims of these scandals or incidents are minors, they are pretty much afraid of their social dignity, and that's why they are forced to keep themselves silent. Those who tried to seek help from the justice system, these powerful religious institutions suppressed all their allegations and evidence.

From the Catholic Church to religious leaders, a series of cases of sexual abuse have occurred in the past. Figures like Asaram Bapu.¹Gurmeet Ram Rahim Singh², and Bishop Franco Mulakkal³ Have been convicted of heinous crimes of rape, sexual harassment under the disguise of spirituality. Also, the Catholic Church has faced several cases of sexual abuse.

Legal Frameworks have been established in every country to protect children from sexual abuse, but in India laws such as The Protection of Children from Sexual Offences Act, of 2012, and the Bhartiya Nyaya Sanhita aimed to address crimes like rape, and child sexual abuse. However, problematic issues in religious institutions often allow offenders to be excluded from justice. In the case of Bishop Franco Mulakkal⁴, despite multiple allegations of sexual assault against a nun⁵, he was acquitted by the trial court. These religious institutions have to maintain their religious environment by confronting these crimes rather than by

¹ Saint Shri Asharam Bapu v State of Rajasthan (2013) S.B. Cril Misc Bail Appl No 7115/2013

² Gurmeet Ram Rahim v Central Bureau of Investigation (2018) CRM-M No 45571/2018

³ Bishop Franco Mulakkal v State of Kerala (2020) AIRONLINE 2020 Ker 935

⁴ Ibid

⁵ Carolita Johnson, 'A Woman Becomes a Nightingale' (Longreads, 19 October 2018)

https://longreads.com/2018/10/19/a-woman-becomes-a-nightingale/ accessed 09 March 2025

disguising them. These religious institutions and organisations have to regain their faith by exposing these sex scandals and identifying the main culprit of this crime, and doing these things.

SACRED TRUSTS BETRAYED: UNDERSTANDING SEXUAL EXPLOITATION IN RELIGIOUS INSTITUTIONS

Religious leaders hold excessive power over their followers, and some political leaders give them some extra benefits. This power is derived from religious faith, spiritual guidance, and societal influence. But this power is fully misused for manipulation, coercion, and sexual abuse. The victims are mostly their workers in institutions, the students, teachers, Nuns or disciples, etc. These leaders also operate in hierarchical structures where the followers place immense faith in their leaders. Many religious leaders treated themselves as indisputable, which means nobody can challenge their actions or advice. Most of the Victims are afraid of being labelled as sinners or traitors for speaking out. Offenders often convince their victims that they have to follow them obediently without any question.

They pressure the victims to cut their relationships with their family and friends so that they would not seek any kind of help from outsiders. The victims often come from vulnerable backgrounds, like the minors enrolled in their schools or ashrams who are completely dependent upon them, women who are working in religious service, giving spiritual guidance, and those who are poor, illiterate, and economically weak, all become their easy targets for manipulation. Also, the offenders provoke them as the sexual act is a divine act, a spiritual duty they have to do to get blessings and salvation from God. Religious institutions always prioritise protecting their reputation by covering up these scandals, suppressing the victims, and the evidence.

The consequences of this sexual exploitation can lead the victims to PTSD, and mental trauma, and often whenever they are pregnant then they try their best to hide this scandal by sending the victims to their house and convincing their parents that they have attained physical intimation with someone also sometimes they hide this scandal through giving the victims abortion medicines. Sexual abuse through these religious institutions is a burning issue that requires strict legal prohibition.

CASE STUDIES OF RELIGIOUS LEADERS INVOLVED IN SEXUAL MISCONDUCT

Saint Shri Asaram Bapu v State of Rajasthan (2013): Asaram Bapu⁶, a self-styled holy man in India, was convicted in a high-profile rape case in 2013. The allegations surfaced in August 2013, which led to his arrest in 2013. A 16-year-old girl accused him of sexual assault at his ashram near Jodhpur, Rajasthan. According to the statement of the victim, she was taken to the ashram by her parents, who were followers of the ashram, under the pretext of spiritual healing.

The victim alleged that Asaram sexually assaulted her during a spiritual ritual to exorcise evil spirits. After nearly 5 years of the trial, Justice Madhusudhan Sharma conducted a special court in Jodhpur Central Jail due to some security concerns. Asaram was found guilty under Section 342⁷ (Punishment for Wrongful Confinement), Section 376(2)(f)⁸ (Aggravated Rape), Section 376(D)⁹ (Gang Rape), Section 370(4)¹⁰ (Trafficking of persons), Section 354A¹¹ (Sexual Harassment and Punishment for Sexual Harassment), Section 506¹² (Punishment for Criminal Intimidation), Section 509¹³ (Word, Gesture, or Act Intended to Insult the Modesty of a Woman), Section 34¹⁴ (Acts Done by Several Persons in Furtherance of Common Intention), Section 120B¹⁵ (Punishment of Criminal Conspiracy) of The Indian Penal Code, 1860. Section 23¹⁶ (Punishment for Cruelty to Juvenile or Child), and Section 26¹⁷ (Exploitation of Juvenile or Child Employee) of the Juvenile Justice (Care And Protection Of Children) Act, 2000. Section 5(f)¹⁸ (Aggravated Penetrative Sexual Assault), Section 7²⁰ (Sexual Assault), Section 8²¹ (Punishment for Sexual Assault) of the Protection of Children from Sexual Offences (POCSO) Act, 2012. However, the judgment was a victory for the justice system and

⁶ Ibid

⁷ Indian Penal Code 1860, s 342

⁸ Indian Penal Code 1860, s 376 (2)(f)

⁹ Indian Penal Code 1860, s 376(D)

¹⁰ Indian Penal Code 1860, s 370(4)

¹¹ Indian Penal Code 1860, s 354A

¹² Indian Penal Code 1860, s 506

¹³ Indian Penal Code 1860, s 509

¹⁴ Indian Penal Code 1860, s 34

¹⁵ Indian Penal Code 1860, s 120B

¹⁶ Juvenile Justice (Care and Protection of Children) Act 2000, s 23

¹⁷ Juvenile Justice (Care and Protection of Children) Act 2000, s 26

¹⁸ The Protection of Children from Sexual Offences Act 2012, s 5(f)

¹⁹ The Protection of Children from Sexual Offences Act 2012, s 6

²⁰ The Protection of Children from Sexual Offences Act 2012, s 7

²¹ The Protection of Children from Sexual Offences Act 2012, s 8

also for sexual violence against minors. Asaram's legal team filed multiple bail applications, which were consistently rejected by courts due to the serious charges or allegations and concerns about witness provoking. However, in January 2025, the Rajasthan High Court granted him interim bail for medical treatment until March 31, 2025. It was his first release since his arrest in 2013.

The court granted this decision based on humanitarian grounds, and he is not allowed to make any public gatherings or influence the ongoing legal proceedings. The Asaram Bapu case is a profound leading case of the Indian judicial system; it shows the importance of maintaining the integrity of legal proceedings despite external pressure, and it showcases that the law applies to all equally, whether he was an influencer or not.

Sant Gurmeet Ram Rahim Singh v Central Bureau of Investigation (2017): Gurmeet Ram Rahim Singh, the former chief of Dera Sacha Sauda, and CBI,²² represented one of India's most high-profile criminal cases. Since 2002, multiple criminal cases have been already registered against this self-styled holy man, with the allegations from rape to murder. In 2002, two female disciples of Dera Sacha Sauda accused the chief, Gurmeet Ram Rahim Singh, of sexual assault. These allegations were made through an unknown letter addressed to Prime Minister Atal Bihari Vajpayee. After that, the Punjab and Haryana High Court directed an investigation. Later, the investigation was handed over to the C.B.I. This was the first major criminal allegation made against him, which later led to his imprisonment. In the meantime, the trial faced numerous delays, and also, the Special CBI Court shifted from Ambala to Panchkula before reaching the final verdict.

On August 2017, the special C.B.I. court found Gurmeet Ram Rahim Singh guilty of rape under Section 376²³ (punishment for rape) and Section 506²⁴ (Punishment for criminal intimidation) of the IPC, of 1860. After the final verdict, his followers violently protested in Haryana, Panchkula, which led to the death of 38 people and property damage. So, Judge Jagdeep Singh pronounced his sentence in a special court arranged in Sunaria Jail. Ram Rahim was sentenced to 20 years of rigorous imprisonment, 10 years of each rape case. Additionally, he was fined an amount of Rs. 15 lakh for each case. This case was marked as

²² Sant Gurmeet Ram Rahim Singh v Central Bureau of Investigation (2017) CRR No 993/2017 (O&M)

²³ Indian Penal Code 1860, s 376

²⁴ Indian Penal Code 1860, s 506

a significant, high-profile case showcasing that influential religious figures could be held responsible for heinous crimes.

Bishop Franco Mulakkal v State of Kerala (2020): The Bishop Franco Mulakkal²⁵ Case is remarkable in India's judicial history, marking the first time a catholic bishop faced rape allegations. The allegations began in June 2018 when a 44-year-old nun from the Missionaries of Jesus congregation accused the bishop of raping her on multiple occasions between 2014-2016 at a convent in Kottayam, Kerala. The nun stated that she had sought redress through the church channels before going to the civil authorities. The case drew national attention when the nuns staged a hunger strike in Kochi, demanding Malakal's imprisonment.

This protest by nuns against religious institutions created a significant impact throughout the whole country. Finally, Mulakkal was arrested in September 2018 and got judicial custody, but after completion of the interrogation and spending almost a month in custody, he was granted bail and returned to his duties. Finally, the trial was started in 2020 based on all the evidence and numerous witnesses, including nuns and church officials. Throughout the whole trial, he stated his innocence and claimed that the nun fabricated a false case against him.

After almost three years of the trial, on January 14, 2022, the additional sessions court at Kottayam released the bishop from all charges. But as of now, the case in the Kerala High Court is pending, or the high court may overturn the judgment of the trial court. Despite the released order of the bishop, this case highly influenced the Indian catholic churches, and through this case, a highly positioned religious leader from the church was imprisoned for the first time in India. The case shares an important role in allegations of sexual abuse, and rape. At last, this case shares an important position in the cases of sexual exploitation in religious institutions.

Catholic Church Sexual Abuse Scandal: The Catholic Church Sexual abuse scandal was the most devastating religious institutional case in modern religious history. For almost a decade, the church has faced several allegations of child sexual abuse, and also, it also followed an institutional pattern of concealment that prioritised the Church's reputation and dignity over the victim's welfare. Some documents revealed that bishops regularly

²⁵ Ibid

transferred accused priests to new churches without informing the past allegations, which enabled the continuous abuse cases. This incident extended to the highest levels of the church hierarchy; Vatican officials were aware of this systematic problem, but they did not take any action. This scandal has affected numerous countries globally.

In Belgium in 2010, data revealed approximately 300 cases of sexual abuse across every part of the country, and approximately 13 victims committed suicide. In the United States of America, more than 11,000 cases of sexual abuse have been made against more than 6,000 priests since 1950, and a fact revealed that the church, to protect its reputation, paid approximately 4 billion dollars for settlements. Australia's Royal Commission identified more than 4,400 victims and found more than 7% involvement of the catholic priests.

In Ireland, more than 1000 victims of the church faced terrible physical and sexual abuse for almost a decade. Similarly, Germany, France, and Poland have revealed more than 10,000 additional cases, showcasing the scandal's global reach. Many of the victims suffered lifelong physical and mental trauma, and many of them attempted suicide. However, in recent times, bishops and church officials have resigned from the church.

A Pennsylvania grand jury report revealed more than 1,000 sexual abuse cases, and most of them involved children molested by approximately 300 priests.²⁶ Despite recent changes and resignations, the scandal continues to unfold with new allegations. However, church officials and priests have been fully liable for this scandal over the decades.

LEGAL FRAMEWORK IN INDIA: ADDRESSING SEXUAL CRIMES IN RELIGIOUS INSTITUTIONS

Religious Institutions in India are revered as places of spiritual guidance and belief. However, reports of sexual exploitation have raised critical concerns about the justice system. To protect the victims and to fight against such crimes, India's legal framework provides a range of statutory provisions under the Indian Penal Code (IPC), Bhartiya Nyaya Sanhita (BNS), Protection of Children From Sexual Offenses (POCSO) Act, Juvenile Justice Act 2000 & 2015, Religious Institutions (Prevention of Misuse) Act, 1988 and the Information

²⁶ Rob McMillan, 'Diocese of San Bernardino to release names of priests accused of sexual assault' *abc7 NEWS* (20 September 2018) < https://abc7.com/diocese-of-san-bernardino-ie-county-sexual-assault/4288890/> accessed 09 March 2025

Technology Act, 2000. These Laws aim to protect against sexual offences and secure the victims, This section explores the key legal provisions governing sexual crimes in religious institutions in India.

Indian Penal Code (IPC) Addressing Sexual Crimes in Religious Institutions: The Indian Penal Code (IPC),1860, also now replaced by Bhartiya Nyaya Sanhita (BNS),2023, but this is still relevant in understanding past cases.

- 1. Section 354²⁷ (Outraging the Modesty of a Woman) criminalises any act intended to outrage a woman's modesty, and it is also often used in cases of religious leaders engaged in sexual abuse.
- 2. Sections 375 & 376²⁸ (Rape and Punishment for Rape): Under Section 375 defines rape, emphasizing lack of consent. And Under Section 376 provides severe punishment, including life imprisonment or the death penalty, when somebody in a position of authority including religious leaders attained rape. It also applied in the case of Asaram Bapu v State of Rajasthan²⁹ and Gurmeet Ram Rahim Singh v Central Bureau of Investigation (C.B.I).³⁰
- 3. Section 376C³¹ (Sexual Harassment by Words or Gestures). This Section Covers non-consensual sexual acts by individuals in power, including priests, preachers, and religious heads.
- 4. Section 509³² (Sexual Harassment by Words or Gestures) Punishes verbal sexual harassment, inappropriate gestures, or acts meant to insult the modesty of a woman.
- 5. Section 120B³³ (Criminal Conspiracy in Sexual Crimes). This Section defines the liability of networks or groups within religious institutions that protect sexual offenders. Also, this provision was used in cases like Bishop Franco Mulakkal v State of Kerala, where the bishop was accused of raping a nun with institutional backing.

²⁷ Indian Penal Code 1860, s 354

²⁸ Indian Penal Code 1860, ss 375-376

²⁹ Saint Shri Asharam Bapu v State of Rajasthan (2013) S.B. Crim Misc Bail App No 7115/2013

³⁰ Sant Gurmeet Ram Rahim Singh v Central Bureau of Investigation CRR No 993/2017 (O&M)

³¹ Indian Penal Code 1860, s 376C

³² Indian Penal Code 1860, s 509

³³ Indian Penal Code 1860, s 120B

Transition from IPC to Bhartiya Nyaya Sanhita (BNS) A Step Towards Modernised Justice: After the repeal of the Indian Penal Code (IPC) and the enactment of the Bhartiya Nyaya Sanhita (BNS), 2023, the criminal justice framework has undergone a significant transformation. The BNS retains many provisions of the IPC while introducing reforms aimed at ensuring stricter punishment and better victim protection, especially in cases of sexual offences, including those committed under the guise of religious institutions. The following sections of the BNS are particularly relevant in addressing sexual exploitation in religious institutions:

- 1. Section 63³⁴ (Stricter Punishment for Repeat Sexual Offenders) ensures severe penalties for religious leaders and preachers with repeated offenses.
- 2. Section 64(2)(f) & 64(2)(k) (Highlighting its applicability to Sexual Exploitation by Religious Leaders & Misuse of Religious Practices).
- 3. Section 64(2)(f)³⁵ penalty for sexual offences by persons in positions of trust, including spiritual mentors.
- 4. Section $64(2)(k)^{36}$ criminalises sexual exploitation disguised as religious rituals.
- 5. Section 75³⁷ (Enhanced Punishment for Crimes Committed Under Religious Pretexts). Penalties for crimes committed in the name of religion, ensuring strict action against priests and religious authorities who exploited their followers.
- 6. Section 109³⁸ (Organised Crime and Conspiracies Related to Sexual Exploitation). This section deals with organised crime, including criminal conspiracies related to sexual exploitation. It is applicable when religious institutions or authorities protect sexual offenders, facilitate trafficking, or shield abusers under religious pretexts.
- 7. Section 112³⁹ (Punishment for Abetment of Sexual Crimes). This section defines religious institutions and individuals accountable for aiding sexual offenders.

³⁴ Bharatiya Nyaya Sanhita 2023, s 63

³⁵ Bharatiya Nyaya Sanhita 2023, s 64(2)(f)

³⁶ Bharatiya Nyaya Sanhita 2023, s 64(2)(k)

³⁷ Bharatiya Nyaya Sanhita 2023, s 75

³⁸ Bharatiya Nyaya Sanhita 2023, s 109

³⁹ Bharatiya Nyaya Sanhita 2023, s 112

8. Section 124⁴⁰ (Criminal Conspiracy to Commit Heinous Offences). This section deals with the penalty for conspiracies to commit serious offenses, including sexual offenses. If religious leaders collude to cover up sexual misconduct, intimidate victims, or manipulate the evidence, they can be charged under section 124.

The Protection of Children from Sexual Offences Act 2012: The POCSO Act 2012 is specifically designed to protect minors from sexual offences. It defines various forms of sexual abuse, explains severe punishments, and mandates reporting to ensure child safety. It was designed after the Nirbhaya Case.⁴¹

- 1. Section 3⁴² (Penetrative Sexual Assault): This section defines penetrative sexual assault as penis penetration into the vagina, anus, or mouth of a child. Insertion of any object or body part (except for medical purposes) into the child's body. Manipulating the child's body to cause penetration. Engaging a child in non-consensual sexual acts that result in penetration.
- 2. Section 4⁴³ (Punishment for Penetrative Sexual Assault) defines: Minimum punishment: 10 years imprisonment, extendable to life imprisonment. Fine: The court may impose a fine, which will be used for the child's rehabilitation.
- 3. Sections 5 & 7 (Aggravated Sexual Assault by Religious Leaders)
- 4. Section 5⁴⁴ Covers aggravated sexual assault by a person in authority.
- 5. Section 7⁴⁵ Punishes sexual exploitation even without penetration.
- 6. Section 21⁴⁶ (Mandatory Reporting of Child Abuse Cases) requires religious institutions to report sexual crimes involving minors.

⁴⁰ Bharatiya Nyaya Sanhita 2023, s 124

⁴¹ Mukesh & Anr v State for NCT of Delhi & Ors AIR 2017 SC 2161

⁴² The Protection of Children from Sexual Offences Act 2012, s 3

⁴³ The Protection of Children from Sexual Offences Act 2012, s 4

⁴⁴ The Protection of Children from Sexual Offences Act 2012, s 5

 $^{^{45}}$ The Protection of Children from Sexual Offences Act 2012, s 7

⁴⁶ The Protection of Children from Sexual Offences Act 2012, s 21

Juvenile Justice (Care and Protection of Children) Act 2000:

- 1. Section 23⁴⁷ (Cruelty to Juveniles or Children) Punishes any person in charge of a child who assaults, abuses, or sexually exploits them. Can be applied to religious leaders running ashrams, orphanages, or spiritual retreats.
- 2. Section 26⁴⁸ (Exploitation of Juveniles or Child Employees) penalises the sexual exploitation of children placed in institutions under religious figures.

The Juvenile Justice (Care and Protection of Children) Act 2015: It introduced a new structure and replaced several provisions.

Changes in the Juvenile Justice Act, 2015 -

- 1. Section 23 of the 2000 Act (Punishment for Cruelty to Juvenile or Child) was replaced by Section 75 of the 2015 Act, which deals with Punishment for Cruelty to a Child.
- 2/ Section 75⁴⁹ punishes any person in charge of a child who assaults, neglects, abuses, or causes mental or physical suffering.

Applicable to religious institutions running ashrams, orphanages, or spiritual retreats where children face abuse.

- 3. Section 26 of the 2000 Act (Exploitation of Juvenile or Child Employee) was replaced by Section 79 of the 2015 Act, which defines Exploitation of a child employee.
- 4. Section 79⁵⁰ penalises using children for illegal purposes, including forced labour and sexual exploitation.

This can be applied to cases where religious institutions force children into exploitative work under the guise of spiritual or religious training.

The Religious Institutions (Prevention of Misuse) Act 1988: This act Prohibits Religious Institutions from Being Used for Criminal Activities and targets ashrams, temples, mosques,

⁴⁷ Juvenile Justice (Care and Protection of Children) Act 2000, s 23

⁴⁸ Juvenile Justice (Care and Protection of Children) Act 2000, s 26

⁴⁹ The Juvenile Justice (Care and Protection of Children) Act 2015, s 75

⁵⁰ The Juvenile Justice (Care and Protection of Children) Act 2015, s 79

churches, and religious retreats that become hubs for sexual crimes⁵¹. Legal Action against Institutions that Cover Up Sexual Abuse Ensures accountability for religious bodies that protect sexual offenders.

The Information Technology Act 2000: It addresses Digital Sexual Exploitation: In cases where religious institutions are involved in digital sexual exploitation, including child pornography or online abuse, the IT Act of 2000 applies.

Section 67: (Punishment for Publishing or Transmitting Obscene Material in Electronic Form) criminalises the uploading or circulation of sexually explicit content, including instances where religious leaders engage in online exploitation. Section 67A⁵² (Punishment for Publishing or Transmitting Sexually Explicit Content) covers cases of sexual abuse where victims are blackmailed using explicit videos or images.

Section 67B⁵³ (Child Pornography and Digital Exploitation of Minors) penalises the creation, transmission, or storage of child pornography, which can be used against religious institutions involved in online child abuse.

However, the legal framework of India to prevent cases of sexual exploitation in religious institutions provides security and protection to tackle these cases.

CONCLUSION

Sexual Exploitation in religious institutions and by religious leaders is a burning issue that not only shatters the lives of the victims but also creates a bad impact on society and the followers of these organisations and leaders. The misuse of these religious institutions to fulfil the unnatural sexual satisfaction of these leaders is a complete betrayal of the trust and belief of the followers. The above-discussed cases, which happened in the past, highlight the necessity of addressing this crisis occurring in such sacred places. Such incidents are not isolated incidents, but they indicate the failure of our system.

The above-discussed legal statutes in India provide the proper legal framework for how to fight against these things, but the proper enforcement remains a challenge. Victims often face

⁵¹ The Religious Institutions (Prevention of Misuse) Act 1988

⁵² The Information Technology Act 2000, s 67A

⁵³ The Information Technology Act 2000, s 67B

life threats, face-stigma, physical and mental trauma, etc. Internationally, the UN Convention on the Rights of the Child⁵⁴ and the Convention on the Elimination of All Forms of Discrimination Against Women⁵⁵ highlight the necessity of global accountability and the security of the victim.

To prevent these abuses, the transparency and liability of the religious institutions must be undisputed. To uncover the culture of silence, promoting awareness can ensure that gender discrimination and redressal mechanisms will be reduced. And the most important step has to be taken by the Government side; the Government must enact strict regulations and keep monitoring religious figures effectively.

In the end, this fight against sexual exploitation in religious institutions is a fight for justice, social dignity, and human rights. Trust and belief should never be the shield of these Inhumans. True spiritual leadership is always built on morality and ethics, not exploitation. Only then can the faith and belief in religious institutions and leaders exist harmoniously.

⁵⁴ Toby Long and Jennifer Guo, 'Moving beyond Inclusion to Belonging' (2023) 20(20) International Journal of Environmental Research and Public Health < https://doi.org/10.3390/ijerph20206907 accessed 09 March 2025

⁵⁵ 'Monitoring the Beijing platform for action and the Convention on the elimination of all forms of discrimination against women' (Forum of Women's NGOs of Kyrgyzstan)

https://forumofwomenngos.kg/monitoring-the-beijing-platform-for-action-and-the-convention-on-the-elimination-of-all-forms-of-discrimination-against-women/?lang=en accessed 09 March 2025