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Women's subordination in news print coverage of rape in India

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THE MONOCHROME LENS OF THE MEDIA? WOMEN'S SUBORDINATION IN NEWS PRINT COVERAGE OF RAPE IN INDIA

1. INTRODUCTION

On December 16th 2012, Jyoti Singh Pandey was violently gang-raped in New Delhi, eventually causing the city to earn the title of 'rape capital of the world' (*The Crescent* 2014). Whilst sexual violence is hardly a new issue in India, this particular event gained international media attention and punctured the country's desensitization to women's rape. As the global community revised its once admiring gaze at India's economic boom and technological advancement, the state was forced to take a step back and become self-reflective. The assault became representative of a 'putative battle between two Indias; the first, new and modern, and the second, old and backward' (Roychowdhury 2013:282).

The aftermath of the Delhi rape case mobilized women's groups to challenge the pervasive gender inequality entrenched in Indian society. It further imbued assaulted women with the confidence to vocalize their mistreatment. From January to November 2012, 661 cases of rape were reported in Delhi. During the same time period in the following year, this increased to 1,493 (*The Economic Times* 2013). Although rape is routinely reported in the news print media, there was an increase of coverage mirroring this rise. Joseph and Sharma (2006:9) suggest that enhanced visibility of women's issues in the press may not be an unmitigated good. By focusing on instances of rape, this study seeks to identify whether there has been a qualitative change in the way gender has been constructed in news print coverage following the rising social

unrest within India, as well as the surge of global interest in its internal affairs.

1.1. Context

The Delhi rape case was the most widely covered rape incident in India's recent history both nationally and globally (Drache 2014). It has been argued that the case cracked a 'cultural taboo' surrounding discussion of sexual violence in a country that relegates rape to a woman's private sphere (George 2013). Public reaction to the incident was unprecedented as it spurred on protests that challenged India's patriarchal society and its normalization of violence against women, sexual or otherwise.[1] The state responded by creating the Justice Verma Committee and the Criminal Law (Amendment) Act 2013. Adhering to Das's (1996:2) conceptualization of a critical event as a moment that instigates new modes of action through the implementation of institutional practices, this research posits the Delhi rape case as one such event in India's history. In calling attention to the acute problems of social exclusion and structural violence in Indian society, the Justice Verma Committee prioritized the need to re-define the role of women in the public agenda.

The media is a pivotal mechanism in broadcasting issues to the public forum for discussion. Gramsci's (1971) notion of hegemony informs its ideological motivations. Whilst hegemonic power is neither monolithic nor unassailable, the media perpetuates ascriptions of normative gender roles as defined by the

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[1] India suffers from pervasive gender discrimination including female feticide (the male to female population is 0.93, which is worse than in 1970), sexual assault and domestic violence (Pazzanese 2013).

dominant elites. Existing both in and between the public and private spheres of society, it then ascribes these values to specific issues and news stories. As a communication tool, one would expect Indian media coverage of rape to change as a response to the unrest emerging in civil society. However, as a profit generating enterprise it's priorities lie in molding rather than reflecting public perception. The capitalist dimension of the Indian media causes it to articulate a distorted social reality that fails to challenge patriarchal norms.

1.2. Research Aims

By focusing on how gender is constructed within rape coverage, this research hopes to complement existing theoretical literature on women's subordination in the media. Current scholarship has focused on the visibility and types of women's issues covered in the Indian press (Bathla 2002; Joseph and Sharma 1994; Prasad 2005). The few studies on the Indian media following the Delhi rape include Drache and Velagic's (2013) analysis of the diversification of coverage relating to rape in English language newspapers. Thus, prevalence has continually been placed on media content rather than the construction of gender itself. Bathla (2002:2) acknowledges that the Indian media actively indulges in the processes of gender construction, yet there is little discursive analysis on how this is achieved. Accordingly, this examination of the construction of gender in rape reporting supplements the gap in previously existing scholarly literature. It exposes the manifestation of entrenched patriarchal attitudes in the media and provides a basis to challenge the structural features of Indian society that condone gendered violence.

Athique's *Indian Media* (2012) argues that India's media has transformative power. Subsequently, this study of media discourse illuminates the extent to which the media has embraced such potential following the rising tensions in India's domestic climate. If enhanced visibility of rape is accompanied by stereotypical constructions of gender, the media effectively validates the perpetuation of rape culture. The significance of this research is therefore underpinned by the media's importance in influencing public opinion. In order to assess whether there has been a qualitative change in media portrayals, the research asks the following questions: how do notions of agency and caste-class considerations inflect upon the construction of gender and to what extent do these constructions remain a product of patriarchy?

This study analyzes rape reports in the two most widely circulating English language dailies, *The Times of India* and *Hindustan Times,* from December 16th 2011 to December 16th 2013. The methodology triangulates quantitative and qualitative research methods through the use of content and discourse analysis. Content analysis identifies recurring themes in mass media communications whilst discourse analysis is concerned with the way transparent and opaque structural relationships of power manifest themselves in language (Wodak and Meyer 2001:2). By situating the research within a feminist media theoretical framework, this study contextualizes the perpetuating subordination of women in the news print media despite changes in India's social environment that question such inequality.

This research challenges the praise scholars have given to the progressive changes taken by the media in the aftermath of the Delhi rape (Drache and Velagic 2013; Wu 2013). The discourse analysis reveals that whilst stereotypical representations of women in rape cases have waned, patriarchal portrayals persist in a more covert matter. Furthermore, the dehumanization of male perpetrators allows the Indian media to disseminate a cultural ideology that denies the social problem of rape and instead shifts blame to forces of modernization. Despite the social activism and widespread uproar surrounding instances of sexual violence in India, an analysis of gender construction in rape reports suggests that whilst there has been breadth and diversity in the types of incidents reported, the increase in exposure is merely superficial as qualitative change has been minimal. One of the contributing reasons for this inherent patriarchy is the use of first information reports as primary sources for news articles. The police unconsciously silence the perspective of women, whereby subsequent media reports endorse these hidden transcripts of misogyny.

1.3. Summary

This dissertation will proceed as follows. Chapter 2 discusses the relevant literature and key concepts that inform this study. It will use a feminist media framework to theorize the relationship between the media and women's continuing subordination in society. Chapter 3 will explain the methodology. Chapter 4 analyzes the major findings of this study, and the way in which a superficial increase in sympathy towards the victim has not equated to transformations in representation. Instead, rape reports have detrimentally

found new ways to oppress women and displace the social problem of rape. Chapter 5 will suggest the need for re-defining India's public space in order to allow for more truthful reporting styles that are not restricted by the patriarchal imperatives of the police and market. It considers the emergence of new mediums of social media as a means to escape the misogyny of police reports that triply oppress the rape victim. To conclude, the paper will reflect upon the outcomes of the study.

2. THEORETICAL FRAMEWORK AND LITERATURE REVIEW

The major theoretical framework for this research derives from feminist media studies, an approach that emphasizes the gap between gender representations and social reality (Young 1990:8). For Tuchman (1978), the media performs two simultaneous tasks; first, enshrining and reflecting dominant societal values and then acting as a means of socialization. Therefore, media images are regarded as 'a version of reality that is culturally determined' (Jewkes 2012:37). It is a site where 'cultural understanding about women are reflected, created, transformed and publicized' (Hirsch 1994:1027). In India, the rise of movements for gendered justice after the Delhi rape case suggests a shift in social perceptions of women. Accordingly, this study interrogates whether the media has adapted to reflect this attitudinal change. As a system of gender ideology, the media reflects masculine understandings of the world, and in turn legitimates the "natural" authority of men and subordination of women (Daly & Chesney-Lind 1988; Flavin 2004; Humphries 2009). Constructions of gender thus reinforce the socialization of 'dichotomized and hierarchal sex-role stereotypes' (Carter and Steiner 2004:2).

Feminist media theorists argue that the media provides a space to 'construct hegemonic definitions of what should be accepted as "reality"' (ibid.). This, in

turn, supports the two interlocking systems of patriarchy and capitalism. Through 'institutional coerciveness' (Cameron 1997:31), stereotypes portrayed in the media transcend alternative practices of gender construction. By selectively disseminating ideology and information, the media largely perpetuates and reinforces the status quo regarding the position of women (Prasad 2005:13). The general categories identified in the construction of gender dichotomies include powerlessness and passivity against authority and power, with the former associated with women and the latter with men (Van Zoonen 1994). The Indian media appropriate the cultural norms that relegate women to the private sphere, which performs a secondary socialization by reinforcing typically female roles (Smart and Smart 1978:2). Although previous blatant sexism has dissipated in Indian media, this has evolved into subtle distortions due to the media's patriarchal structure (Joseph and Sharma 2006:42). Ergo, the way women and men are constructed within rape coverage reinforces these socially appropriated roles. The question is whether there have been any changes to move away from such stereotypes, overt or clandestine.

The portrayal of violence against women in the media is intrinsically tied to an ideology that reflects patriarchal assumptions regarding the rightful role and behavior of women and the cultural myths that allow these assumptions to persevere (Carll 2003). Garcia (2012:20) argues that women's culpability is dictated by the 'institutionalization of victimhood and social ideologies of doing gender'. Those who do not conform to the ideal woman archetype renounce their ability to be identified as an ideal victim. Hindu tradition has projected Sita, a chaste, passive and self-sacrificial individual, as the ideal

woman. Portrayed as a goddess and mother vis-à-vis the colonial ideology (Parajuli 2001:275), women who transgress this patriarchal ethos of Hindu culture are regarded as partially blameworthy of their assault. Scholarly literature has accused media reporting of sexual violence of adhering to a "rape myth" paradigm (Benedict 1992; Burt 1980; Gallagher 1980), whereby women are understood through a virgin-whore dichotomy. This model will be used to highlight the destructive nature of both narratives in Indian media, not only for the victim but also to public understandings of rape. Each constricts women to an appropriate code of normative behavior. Consequently, the general form and content of rape reporting indirectly

> 'perpetuate[s] women's social and sexual subordination by producing rape reports which serve as a… veiled "warning" to non-conforming "independent" women, … as an implicit form of social control'
>
> (Smart and Smart 1978:91).

This "rape script" suggests that 'social structures inscribe on men's and women's embodied selves and psyches the misogynist inequalities which enable rape to occur' (Marcus 1992:401).

The constructions of gender in moments of sexual violence endorse a "secondary rape" (Campbell 2008) of the victim, where the woman becomes powerless, stigmatized and ashamed by the public's failure to recognize the severity of rape. Despite a growing awareness of gender inequalities in Indian society, the proceeding analysis of rape reporting demonstrates how the commodification of female experience and trivialization of gendered injustice persist. Under the façade of neutrality, the Indian media enforces women's

subordination by implicitly perpetuating certain stereotypes. What one must question however is if these rape myths are a product of women stepping out of their prescribed gender roles, or are they instead a product of political ideologies relating to power relations between men and women?

As previously mentioned, as a commodity in a capitalist society, the content and views of the media are shaped by profit-generation and consumerist culture (Kalam and Rajan 1998). Often, such views support hegemonic masculinity. However, as hegemonic realities are continuously renegotiated and contested – there remains a space for counter-hegemonic impulses of resistance and struggle to take root. Thus, 'oppositional forces such as women's movements may attempt to recast media definitions of femininity in order to advance the political objective of gender equality' (Carter and Steiner 2004:3). As Walby et al. (1983:94) argue, newspapers are adept in 'sensing that there is an issue which is beginning to arouse general interest and they then subtly alter the terms of the debate to achieve the end of selling newspapers and making a profit'. News production does not exist in a vacuum. Extra-discursive influences include the bureaucratic pressures of space and time. Acknowledging the political economy of the newspaper industry, this study uses feminist media theory to discern whether or not there has been a change of gender representation in news print coverage of rape stories after the Delhi rape case in 2012. Due to the changing attitudinal perspectives in society, one would expect the views that are economically beneficial for the news industry to shift.

This study focuses on the temporal dimension to the construction of gender in news print coverage of rape after the Delhi incident. Whilst acknowledging that there is a divergence between representation and reality, it aims to use discourse analysis in order to assess whether the wider social context has caused a change in reporting. The key questions raised by this study interrogate the success of counter-hegemonic resistances by examining the use of stereotypes in current representations of rape incidents in comparison to those before the Delhi attack. As the emphasis of the research is on media discourse, it will draw analytical techniques from Foucault's (1980) theory of discourse and the production of knowledge through language. Language has a cognitive role and is a source of power as it espouses ideological considerations. Therefore, such a theoretical paradigm will help identify the constructions of reality the media is dedicated to in the wake of rising women's movements and protests.

The importance of the study lies in its attempt to transcend the cross-cultural homogenization of gender stereotypes that saturate previous scholarly literature on rape reporting. Feminist critiques of gender construction are largely constrained to Western representations. As the underlying imperatives of rape are socially and culturally conditioned, Indian patriarchy implicates itself within instances of rape differently to other parts of the world and therefore warrants independent study. Using the cross-disciplinary sense of gender as a social construct operating in a complex association with the biological construct of sex (McConnell-Ginet 1988), this research focuses on its ascription and will analyze the way hegemonic belief systems influence social assumptions and consequently such portrayals in the media (Bergvall

1999:274). The interest of this study lies in discerning media industry responses to the external environment through its constructions of gender and whether this reveals changing patterns of social oppression.

3. METHODOLOGY

As mentioned earlier, the primary objective of this study is to assess if and how print media constructions of gender have changed in rape reporting following the Delhi rape case. Although fieldwork would be beneficial for assessing the editorial processes that drive media production, news print coverage forms a substantial evidentiary base for analysis in line with the aims of this study. The media is an important institution as it not only reflects but simultaneously constructs reality (Gill 2007:12). Whilst language in the news is meant to be un-bias, it is in fact a 'highly constructive mediator' between hegemonic ideals and public perception (Fowler 1991:1). Through critically analyzing media discourse on rape, this research aims to understand the relationship between power relations in Indian society and the perceptions the media propagates.

This study draws upon both primary and secondary sources. In order to identify whether there have been changes in media representation, newspaper articles from *The Times of India* and *Hindustan Times* have been evaluated using both discourse and content analysis methods.[2] Content analysis is a quantitative research technique that involves a systematic, objective

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[2] In a globalized community, broadcast media provides an invaluable source of analysis, however due to the accessibility of archived footage it is not within the scope of this research to study.

examination and interpretation of a body of material in order to 'identify patterns, themes, biases and meaning' (Berg 2009:338). Critical discourse analysis is a qualitative research method. Using Phillips and Jørgenson's (2002) understanding, discourse refers to the beliefs that construct social reality through the manifestation of language. Analyzing discourse practices highlights the way in which social problems are constructed or reflected, and in doing so increases awareness of 'how to apply these objectives to specific cases of injustice, prejudice and misuse of power' (Bloor and Bloor 2007:12).

3.1. Content

Media reports concerning gender issues, and rape in particular, are often accused of perpetuating the "symbolic annihilation" of women (Tuchman et al. 1978). That is to say, women are mostly underrepresented in the media and yet when they succeed omission, they are either trivialized or condemned. This research analyzes the use of agency, caste/class considerations, and patriarchy in the constructions of gender. Notions of agency are also influenced by the position of women and the spaces they occupy before rape attacks. Whilst feminist geography is not the focus of the study, analysis has incorporated its theoretical insights, as transgressing "acceptable" geographical boundaries forces agency upon women. Analysis will take caste and class descriptions into account, focusing on attention given to background and socio-economic status as often men are exculpated of their actions by their portrayal as victims of alien 'sub-cultures' (Kitzinger 2004:29). As Benedict (1992) notes, often blame is focused on lower class actors, whether victim or perpetrator. In the Indian context, this may be applicable to caste positions as well. Caste and class implications therefore intersect with notions

of victimhood, agency and sympathies. By focusing on portrayals of perpetrators, supposed motivations, and women's presence within articles both before and after the Delhi rape incident, the research will seek to illuminate whether or not the Indian media remains dedicated to espousing the ideologies of a hegemonic masculinity.

3.2. Discourse

The success of media coverage of rape and sexual violence is contested. Journalistic discourse is often critiqued for its reliance on the 'rape myth', a paradigm that simultaneously trivializes the experiences of the victim whilst absolving the perpetrator of responsibility (Burt 1980; Benedict 1992; Franiuk et al. 2008). Patel (2014:46) argues that although media publicity is often the most effective tool in activating the state apparatus, visibility of rape cases is a double-edged sword. On the one hand, coverage of rape stories brings the issue to the public agenda. Sensitive portrayals have the capability to incite changes in perception. Conversely, the commercial interests of the media tend to produce sensational articles that trivialize the brutality and seriousness of violence. Because of the demands of the newspaper market, accounts are often sexualized into forms of soft pornography to encourage sales (Soothill and Walby 1991:86). The persistent reliance on stereotypes within these trivialized portrayals 'reproduce[s] problematic rape identities and narrow conceptualizations of rape and power' (Bumiller 1990:1055). Thus, media accounts may in fact obstruct the feminist project of fighting gender inequality. Indian media specifically has shown an awareness of women's issues in the press, which has increased with the advent of women in decision-making roles in the media and the rise of women's movements. However, the

press routinely sensationalizes certain issues, showing an allegiance to the market rather than informing society in its portrayals. These issues have been taken into account during the newspaper analysis.

3.3. Sample

The newspapers chosen for this study were *The Times of India (TOI)* and *Hindustan Times (HT)* as they are the most widely read and circulated English language newspapers in India with a daily readership of 7,253 and 4,335 people respectively (*Indian Readership Survey* 2013).[3] Furthermore, their archived content is available online. Their readership differs in that *HT* is 'Delhi-based' whereas *TOI* has a national readership. By using both newspapers, this study seeks to elucidate a representational analysis of rape coverage.

The *LexisNexis* search engine was used to source the articles for analysis. Previous studies have shown that consumers of print journalism are more likely to read the headlines of articles, rather than the articles themselves (Dor 2003; Franiuk et al. 2008; Fry 1993). Accordingly, as this study is concerned with routine reports of rape, the search was based on the keywords of 'rape', 'raped', 'gangrape' and 'gangraped' in headlines.

The time frame of the search was influenced by a pre-test/post-test research design, whereby the Delhi rape incident is posited as the treatment. Literature on rape reporting has often focused on time periods that center around

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[3] As the 2013 Indian Readership Survey (IRS) results were contested (*TOI* 2014), this research compared data from the IRS 2012, Quarter 4 results (HANSA 2013) to consolidate findings. Comparative figures were yielded in regards to leading English language dailies.

changes in legislature or significant social protests regarding women's equality in order to assess any variations in style (Korn and Efrat 2008; Meyers 1997; Walby et al. 1983). Following this method, newspaper articles were taken from Dec 16th 2011 to Dec 16th 2013, as this provides an equal length of time for comparison both before and after the incidents of December 16th 2012. This allows opportunity to analyze qualitative changes in light of changing social environments.

From the results generated, mixed purposeful sampling techniques were used to create a database of articles. Every 5th article was inputted, using a systematic approach. Rape reports that included murder were discounted, as often the trial and murder became the focus rather than the issue of rape itself. From this sample, every 2nd article was chosen for discourse analysis in order to create an unbiased representation of rape articles that would not manipulate the outcome of analysis.

3.4. Limitations

Two main limitations arise from this research. Firstly, in only analyzing English language dailies, this study focuses on media that espouses a middle class ideology. This presents a distorted picture of Indian social reality. The experiences of those who are socially marginalized are often neglected from media reporting due to their lack of appeal to readership (Bhushan 2013). Consequently, the parochial focus on middle class ideology reinforces social inequality.

Perhaps more problematically is the time-scale of the study. The two-year time frame prevents any overall assumptions to be made. As Joseph and Sharma (2006:101) note, media coverage of rape follows a perceptible and predictable cycle. Long spells of routine reports are regularly punctuated by brief periods of both intensive and extensive coverage, which are catalyzed by specific cases that grab the imagination of the public and media. Therefore, any progressive changes that surface in the study may fall into this cycle of rape reporting, rather than representing permanent transformations in coverage.

4. THE "CHANGING" NATURE OF RAPE REPORTING

It is undeniable that there has been a proliferation of rape reports in the press following the Delhi rape incident of 2012. In the one-year before the rape, 1,843 articles relating to rape were covered in both the *TOI* and *HT*. This grew to 5,314 in the proceeding one-year period, showing an overall increase of 288%. This growth corresponds to a 140% increase in the number of rape cases reported to the police after the Delhi rape (*Financial Times* 2014). Articles included a range of issues beyond routine reports of rape, such as legal proceedings, changes in legislature, social protests and general comment pieces. As discussed in the previous chapter, articles that were not directly focused on rape incidents were excluded from the sample. Subsequently, 420 articles were selected for analysis over the two-year period.

Generally speaking, rape reports adopt five tones; sensationalism, victim-blaming, routine neutrality, shock and doubt, which at times both implicitly and explicitly suggests false accusations of rape by the victim. Assessing the tone of the media, otherwise known as sentiment analysis, helps reveal whether the attitude towards a given subject is positive, negative or neutral (Anon. 2006). As the media mutually enforces public opinions of rape, significant changes in tone may inflect upon gender constructions and affect

how the issue is received. Over the two-year period, there has been a noticeable change in the amount of articles that adopted victim-blaming and neutral stances (Figures 1 and 2). Of the 420 articles analyzed, there was a 12% decrease in the number of articles that adopted a victim-blaming tone, a 4% decrease in shock, a 20% increase in routine reports and a 3% increase in sensationalism. In the post-treatment period, no articles adopted a doubtful tone, showing a 7% decrease.

Figure 1. Tone of Rape Reports Pre-Delhi Rape Case
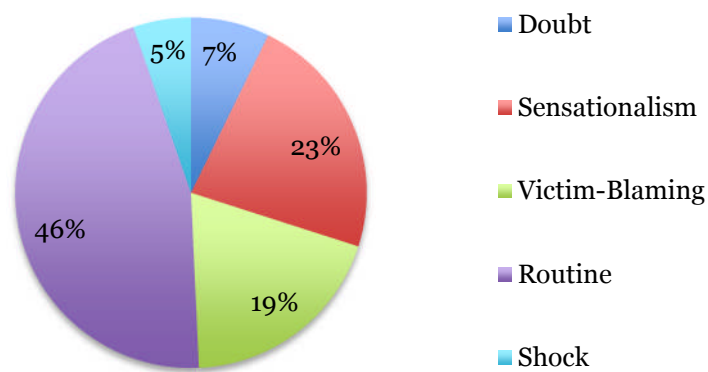
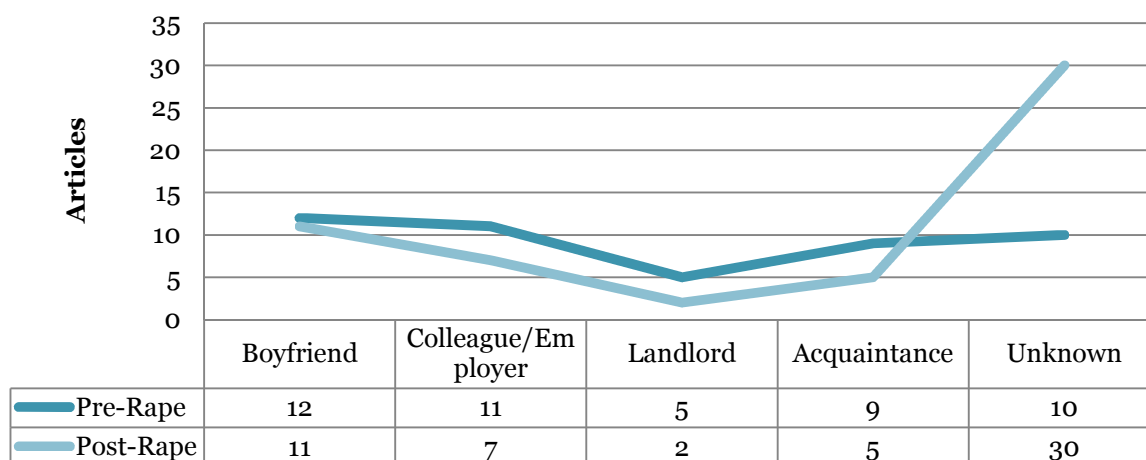**Figure 2.** Tone of Rape Reports Post-Delhi Rape Case
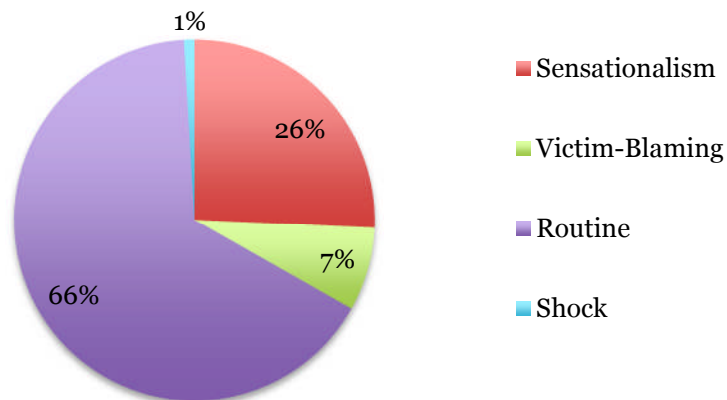
At first glance, the decrease in articles possessing a negative tone towards the victim suggests a more sympathetic portrayal of women in rape reporting. The slight increase in sensationalist rape articles may reflect the media's position as a commodity as it caters to its readership by responding to the surge of national interest in rape. Whilst the nature of this study makes it difficult to ascertain how editorial decisions in the press are made, sensationalism itself reinforces the 'titillating' imperatives that guide consumerist culture and what is deemed "newsworthy" (Cohen and Young 1973; Humphries 2009; Joseph and Sharma 2006).

Through a discourse analysis of articles within each category, this study aims to explore the ideological considerations that subconsciously assert themselves through the changing constructions of gender. Section 1 focuses on the sensationalist articles both pre- and post- Delhi rape. It argues that the media's position as a consumption good has caused it to distort the social reality of rapes by focusing on attacks perpetrated by unknown assailants rather than people acquainted with the victim. Section 2 tracks the changing forms of blame displacement. Section 3 follows the trajectory of routine reports during this time period and elucidates a minimal change in representation. Representations of women became slightly more sympathetic, although the most prominent theme of the dual oppression of patriarchy and capitalism remained the same across the sample. Section 4 concludes by examining overall changes in male representation, which are not isolated to a single tonal classification.

4.1. From lovers to monsters?

In their study, Los and Chamrad (1997:304) found that the press favored coverage of acquaintance rapes rather than the "horror story" of a monster rapist scenario. The former is regarded as having more emotive power due to the titillating potential of the "human interest" story and the novelty value of an everyman rapist. Curiously however, in the Indian context, newspaper coverage displayed the inverse relationship. Before the Delhi-rape, of the 47 sensationalist stories, 37 of the perpetrators were known to the victims. Contrastingly, of the 55 sensationalist articles after, 30 of the perpetrators were portrayed as unknown assailants (Figure 3).

Figure 3. Perpetrators

	Boyfriend	Colleague/Employer	Landlord	Acquaintance	Unknown
Pre-Rape	12	11	5	9	10
Post-Rape	11	7	2	5	30

It is notable that in the pre-rape period, of the offenders that were acquainted with the victim, 16 of them occupied a position of power over the victim as landlords or employers. However, in these articles rape is not presented as a violent attack by men abusing their socially hierarchical position of dominance. Instead, the male perpetrator is almost irrelevant to the story, only briefly identified through his occupation or relation to the victim. The

victims on the other hand are identified as salaciously forming relationships with their attackers, which becomes the center point of such reports. By neglecting the violence associated with rape, the assault is instead situated within a "jilted lover" paradigm. Adopting the 'whore' facet of the standardized rape myth, the victims are constructed as engaging in pre-marital relations and thus transgressing culturally ascribed roles of normative behavior. The media thus endorses the problematic synonymization of rape with sex. This common cultural misconception normalizes the brutality of sexual violence and avoids differentiating between consensual sexual relations and those that are forced.[4]

Under the 'promise of marriage'[5], the women are lured into sexual relations with the accused. Yet, rather than focusing on their violation, the articles tend to highlight unnecessary personal details in order to reinforce the "she was asking for it" mentality intrinsic to the rape myth archetype. Verbs such as 'claimed' and 'alleged' cast aspersions on the victim's sincerity and emphasize her involvement in the attack. Often, the reports' ending refrain focuses on the victims' decision to file a rape case following the broken promise of marriage,[6] which posits the rape allegation as an act of revenge and devalues the traumatic experience of the victim. By constructing rape reports in this way,

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[4] Under the Indian Penal Code, marital rape or nonconsensual partner rape is still legalized. This legal paradigm operates with a problematic notion of consent, whereby certain types of submission, such as accepting a date or agreeing to marriage, are conflated with consent to sex.

[5] Of the 47 sensationalist articles analyzed, the phrase 'promise of marriage' appeared in 13 articles from *HT* and 8 from *TOI*.

[6] 16 of the 21 articles involved cases filed after the broken promise of marriage, 5 from *HT* and 11 from *TOI*.

the impact on the victim is overlooked and the crime trivialized. The use of stereotypes therefore hinders discussion about the real causes of sexual violence (O'Hara 2012:256). Furthermore, the articulated stereotype firmly dictates acceptable standards of behavior for women and rape is projected as a consequence of disobeying such cultural norms. By asserting her sexuality independently outside of marriage, the victim is portrayed as 'fair game' in India's patriarchal culture, for in being 'no man's property…she can be made to become any man's property' (Sengupta 2013).

Although there was a higher prevalence of unknown assailants in sensationalist articles of the post-treatment period, the reports that involve partners in a relationship follow a similar paradigm to the ones pre-treatment. Whilst the focus is on women lured into sexual relations under the pretense of marriage, there is a vulnerability previously absent in coverage, as evident from the example article below 'Man raped handicapped lover, left for dead' (Bhattacharya 2013)(Example 1):

> He brought her to Delhi promising to marry her and show her the good life. But barely a week later, he assaulted her sexually, slashed her face and arms with a blade and left her to die on the roadside. (Example 1)

The articles become more sensational in their sympathetic portrayal, and the violence accompanying the rape is emphasized through her personal injuries, with her 'slashed' face, 'brutalized' body and 'deep gashes'. Unlike previous accounts of acquaintance rape, background details of the victim are used to invoke compassion. The perpetrator's manipulation and excessive aggression re-align the victim with the 'virgin' of the 'virgin-whore' dichotomy.

Despite these similarities, after the Delhi rape case the majority of sensationalist articles focus on unknown assailants. Although it is estimated that 98% of rapes in India are perpetrated by men known to the victim (*National Crime Records Bureau* 2012:83), the media distorts this social reality by instead prioritizing consumer demands in creating a menacing unknown attacker. The media can thence be accused of adopting one type of rape-myth for another, preferring to perpetuate the 'vulnerable female victim and unstoppable male perpetrator' identities (Hirsch 1994:1024). Contrasting the previously lustful Madonna, women are portrayed in a slightly more sympathetic manner. This is evoked by the adoption of graphic, animalistic language previously absent in rape coverage. Men are described as 'overpowering', 'gagging', 'bashing', 'pinning' and 'pouncing'[7] on women. Whereas women were previously explicitly complicit in their assault, they are instead transformed into passive beings enacted upon by these hyper-masculinized men. However, this excessive criminalization reinforces the 'intrinsic otherness of men' (Meagher 2014) and in doing so distances rapists from the normative male thus avoiding acknowledging the gender inequalities that pervade society.

From a consumerist perspective, the representations create sexualized and titillating accounts that border on the line of crypto-pornography. Detrimentally however, these accounts cultivate a fear of women in the public

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[7] 'Overpowering' appeared in 6 *HT* and 11 *TOI* articles, 'gagging' in 4 *HT* and 3 *TOI* articles, 'bashing' in 3 *HT* and 5 *TOI* articles, 'pinning' in 5 *HT* and 7 *HT* articles and 'pouncing' in 4 *HT* and 6 *TOI* articles.

space. This representation of the archetypal rapist 'validates the limitation of the freedom of women' (ibid.), where despite the dehumanizing portrayal of the offender, the focus is on the victim's movements rather than his actions. Thus a paradox occurs that was previously absent in rape reports; the media adopts a moralistic tone and sympathy towards the victim indicated by a change in language, however in portraying women as most vulnerable in public spaces, there is the implicit assumption that this is a domain in which they do not belong. Under the guise of safety, such media portrayals paternalistically relegate and subordinate woman to the private sphere. Feminist literature contends that the association of fear with public spaces is effectively a 'spatial expression of patriarchy' (Valentine 1989:389). This will be further discussed in Section 3.

4.2. New forms of blame displacement

Media reports tend to depict rape in three specific ways; as the epitome of male-female representations, an isolated pathological incident rather than a socially constructed crime, and victim-precipitated (Smart and Smart 1978). The previous section highlighted how the Indian media altered its portrayals of rape in sensationalist articles from the first method in favor of the second. Victim-precipitated rape is an academic devaluation of the rape victim, whereby attention focuses on their activity with the offender preceding the assault, their reputation or wearing suggestive clothing (Amir 1971). Although there has been a reduction in the number of articles suggesting victim-precipitated rape during the two-year period (as seen in Figures 1 and 2), this blame has not necessarily shifted onto the perpetrator as one may expect.

Before the Delhi-rape case, there was a marked focus on the victim's behavior, suggesting victim provocation and culpability. There is a misdirected focus on women who have adopted Western cultural attitudes, such as drinking with men, engaging in heterosexual relations and attaining questionably appropriate means of employment. For example, a rape victim 'working in hotel as a bargirl' was described as 'not clean' (*TOI* 2012a) (Example 2). This unnecessary detail casts judgment on her character, rooted in her choice of occupation. The legitimacy of her claim is further tainted by the fact that she 'accepted' a lift from strangers:

> I went to a bar in Fancy Bazar to attend a weekend party with my friend Gaurav Haloi. At 10.15pm, when we left the bar, these two guys came in their vehicle and offered us a lift to Mathura Nagar of Dispur. We accepted their offer as it was late. (Example 2)

Not only is she out late at night, but she is furthermore socializing in bars with a male friend- all three activities falling outside the realm of appropriate female behavior. The victim is shown to have agency as she is not forced into the social situation. Instead there is the idea that rape could have been prevented, as she went 'willingly' with the perpetrators. In fact, in articles of this type the perpetrator himself is rarely mentioned. Instead, women are portrayed as complicity agreeing to the circumstances that predicate their assault, sometimes even initiating contact themselves. This is interlinked with the articles discussed in Section 1, as regardless of tone, the act of engaging in a pre-marital relationship posits the victim as one who violates the codes of an Indian patriarchal ethos. Furthermore, the press showed a trend of cataloguing stories of "cultural transgressors", consolidating the sentiment

that a woman's rape is of her own accord. These presentations reflect the social perception that forsaking Indian tradition to assume Western styles of behavior automatically causes victims to become more susceptible to rape. As Mohan Bhagwat controversially stated, more rapes happen in 'India' than 'Bharat'- the first being a synecdoche for promiscuous modernity and the latter for a more pious order where women live within the boundaries as prescribed by patriarchy (quoted in Ghosh 2013).

Despite the 12% decrease in articles blaming the victim after the Delhi rape case, the 7% of articles that assumed this tone followed a similar pattern of focusing on women's behavior. However, instead of concentrating directly on women's actions in the public sphere, a new theme emerged previously unmentioned in rape reporting - the rise of Western technologies. Of the 15 articles that were orientated with victim-precipitation, 12 of them focused on stories of women meeting an acquaintance online, showing an increase of 80%. It could therefore be argued that the media generates a fear of modernity, as there are repeated references to women being raped or gang-raped after befriending men on Facebook, matrimonial sites and other social networking sites. In this respect, women are active agents in contacting and choosing to meet their "cyber-lovers". The media is not entirely unsympathetic however. The victims' assault upon meeting these men was explicitly described as often they were brutally attacked, 'thrashed' and 'robbed'.[8] Similar to the cultivation of fear of the public space as discussed in Section 1, such graphic details serve to obliquely critique globalization by

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[8] 'Thrashed' appeared in 8 of the articles, 2 from *HT* and 6 from *TOI*. 'Robbed' appeared in 1 *HT* and 4 *TOI* articles.

inadvertently blaming women in their ability to transgress spatial boundaries through the medium of the Internet. This ultimately translates into a violation of culturally prescribed notions of normative behavior. The cherished womanhood of traditional Indian society is seen as eroding away with the influx of foreign and modern culture (Sharma and Gupta 2004:115). Subsequently, the newly emerging media portrayals reinforce Bhagwat's supposition that rape is a problem of Westernization; displacing blame from the men who are conditioned to believe violence against women is socially acceptable.

4.3. The dual oppression of capitalism and patriarchy

It should be noted that although Section 2 focused on articles that were specifically orientated towards blaming the victim, antipathy towards women obliquely manifests itself in routine reports. In such reports, media attention may be argued to reinforce victim-facilitated accounts, rather than victim precipitated. "Victim-facilitated" refers to activities such as living alone or walking alone at night (Burt and Albin 1981; Burt 1997). This concept is inherently problematic as its use in the media refocuses attention to the safety of women rather than the social problem of rape. As Neha Menon elaborates, following the Delhi rape a curfew was imposed, forcing her to leave work at 7pm in order to minimize the possibility of attack (Teng and Bills 2013). This is a preventive rather than curative measure however.

The assumption of victim-facilitation is intrinsically linked to women's position in the workforce, as travelling to and from work indeed implies

walking alone in public spaces. A majority of routine reports across the studied time-period focus on the victim being raped by someone under the pretext of a job interview or promotion, in the workplace itself, and on the way to or from work. 60% of routine reports before the Delhi rape incident fell under this category (n=57), whilst 61.5% of articles fell into this category after the rape (n=86).

It would seem that media reports tend to endorse the idea that rapes are a product of capitalist culture. Engels (1884) stripped the family of ideological mystification and spoke of it as an institution linked to the state and personal property, thus constructing the private sphere as the woman's realm. Mounting financial pressures of the lower classes and castes however force women to transgress these boundaries. Therefore, media portrayals of rapes that occur in these instances focus on women migrating from villages in order to support their family.[9] In one particular article a woman is raped on the way home from her first job upon being abandoned by her husband (Yadav 2012)(Example 3). The article includes a first-hand account that reinforces her chastity, as 'she never knew the accused'. She further claims that:

> ...she had never danced with any guest at the bar. She used to check women visitors... (Example 3)

Whilst sympathetic towards the woman's attack, problematically this still subconsciously disseminates the idea that those who engage in activity with

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[9] Although representations remained consistent across the two-year period, reports of migrant women being assaulted were in the minority. 11 *HT* and 7 *TOI* articles focused on migrant victims pre-Delhi rape and 17 *HT* and 15 *TOI* articles post. Experiences of rural women do not conform to middle class ideology and interest. Thus their social marginalization leads to media exclusion.

men facilitate their own rape. This idea is repeatedly articulated in public discourse by political elites, such as Chief Minister Mamata Bannerjee who claimed the increase in rapes is due to men and women interacting more freely (*IBN* 2014). As women are forced to join the workforce in these instances, the media propagates the idea that patriarchy and capitalism dually assault women.

These representations are consistent across the two-year period, although there is a greater visibility of such cases after the Delhi-rape incident. Weiss and Borges (1973:94) contend that rape itself operates as a social control mechanism to keep women in their 'place'. This sentiment is reinforced by the media attention given to women raped in the public space. Raju (2011:40) postulates that space and place are deeply gendered in India as patriarchally produced social relations confine women to the private sphere of identity. Media representations of rape therefore physically isolate women to the private sphere, demarcating their place both socially and geographically. The fear of rape, common to most women, establishes and maintains their position of subordination as it psychologically inhibits their ability to move around freely. Indeed, if they cross boundaries into male spaces, such as the workplace, sexual harassment and rape are viewed as a 'consequence' of such transgressions (Bhatla 2013).

Rape is culturally acknowledged as a weapon to maintain patriarchal social structures and challenge those who disturb the balance of power. In fact, a recent UN survey uncovered that 9 out of 10 women have been assaulted in Delhi public spaces (Jagori and UN Women 2011). Though this statistic is

high, when focusing on rape specifically, the same study found that women were more susceptible to attack in their homes (ibid.). By espousing an ideology that delineates the public space as the most dangerous place for females, the media discredits the Indian social reality and the number of rapes that occur in the home itself. Because Indian culture views violence in the domestic sphere as an ordinary "private violence" that forms an inevitable part of normal heterosexual relationships (Stanko 1990), the home is falsely positioned as a haven from "unsafe" public spaces.[10]

4.4. Problems of modernization

Rape reports may be divided into two broad categories, one placing blame on the male, whilst the other focuses on victim complicity. The former highlights the loss of control of men, either due to permanent or temporary psychological factors, such as lust, alcohol or asserting their masculinity. The latter tends to highlight victim provocation, either sexually or spatially, from their clothing, previous sexual history and familiarity with the offender, to entering the man's space of the public domain (Walby et al. 1983:87).

The Indian media predominantly tended to make use of the latter; however following the Delhi rape case there was a surge in articles focusing on the danger of unknown 'miscreants'.[11] Generally speaking, in the one-year period preceding the Delhi rape, men are rarely described in detail. Rather, they are

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[10] Pre-Delhi rape, 8.21% (n=17) of articles focused on rape perpetrated at home. This only slightly increased to 8.45% (n=18) after the Delhi rape.

[11] 'Miscreants' only appeared in 1 *TOI* article before the Delhi rape. This increased to 22 *TOI* and 13 *HT* articles after the rape.

peripheral to the article. Interestingly however, their absence acts as a form of subordination as the woman automatically gets positioned as the provocateur. In the rare moments that the media gives attention to the male perpetrator, it is through profiling where offenders are described as being from the 'slums' or having a history of 'non-cognizable offences'. Thus, class becomes a reason for rape rather than social attitudes. In the proceeding year, profiling became more prevalent. Men are continuously described as 'miscreants', 'migrants' and from the 'slums'.[12] Migrant laborers from Bihar, Uttar Pradesh, and other "backward" states are disproportionately represented as perpetrators. Their lower class implies their lower-caste status. A discourse emerges that frames lower-caste and class men as responsible for increases in rape. Subsequently, such descriptions distance rapists from the normative urban male, and thus displace the issue of rape to one predicated on wealth rather than the persisting structural inequality in society.

By focusing on the class of offenders, rape becomes an issue of modernization rather than entrenched cultural attitudes promoting violence against women. As repositories of traditional culture, the female body becomes a site on which migrant labourers may re-assert their masculinity in order to negotiate a society in flux. Kitzinger (2004:29) argues that this portrayal of 'sub' or 'foreign' cultures prevents a feminist critique of dominant patriarchal values and avoids acknowledging endemic cultural attributes excusing normal, aggressive masculinity. Issues of rape become entangled with the state's relative success of failure in the restructuring of the market economy, which

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[12] Pre-Delhi rape, 18.84% (n=39) of perpetrators were described as migrants or living in the slums. This increased to 51.17% (n=109) after the Delhi rape case.

further suggests a link between violence against women and the ideology emerging from neo-liberal economic policies. Therefore, perpetrators are relatively exonerated of their crime. This sentiment is socially prevalent and has been re-articulated by politicians, such as Delhi Chief Minister Sheila Dikshit (*India Today* 2012) who blamed Delhi's 'huge migratory population' for the rising crimes against women. Similarly, in the aftermath of the Delhi rape incident Prime Minister Manmohan Singh (*HT* 2012) suggested that 'footloose' migrants became a 'menace' to society when not adequately absorbed in the process of development, effectively ignoring the normalization of sexual violence at the heart of the issue.

5. TRANSFORMING THE REALM OF PUBLIC DISCOURSE

As Chapter 4 elucidates, whilst there has been an increase in exposure of rape cases in the press, this has been accompanied by minimal changes in the way gender is constructed within such reports. It is worth noting however that although disseminating certain stereotypical representations of women and men in their coverage of rape, the Indian media has positively shown less reliance on the conventional 'rape myth' paradigm in comparison to coverage in other countries, such as South Africa, Israel, the U.K and the U.S. (Wu 2013:38). Furthermore, in what could be read as an attempt to empower women, both the *TOI* and *HT* increased the coverage of protests and women's movements, which naturally promotes the need for gender equality. However, as this study argues, the effects of such articles are questionable when counterpointed with rape accounts that implicitly perpetuate the very gender inequalities such movements are aiming to dismantle.

The media is an industry that operates within the public space. As a patriarchal institution, the ideologies it espouses reinforce women's social subordination by adhering to notions of hegemonic masculinity. Subsequently, the media endorses the specific covert forms of oppression and control that exist in this sphere that then become internalized in the 'individual psychologies or personal lives of oppressed women' (Smart and

Smart 1978:2). Habermas (1962:49) defines the public sphere as a 'realm of social life in which something approaching public opinion can be formed'. The media itself forms a part of the public sphere, as it is influential in cultivating public perceptions on topical issues. Positively, there has been a change in reporting style following the Delhi rape incident in regards to content, including more prevalent critiques of people in power, encouraging police to engage in gender training, and commenting on the inefficiency of legal institutions (Drache and Velagic 2013). This attention highlights recognition of the institutional failings that allow gender discrimination to continue. Nevertheless, this has minimally impacted actual rape reports.

The public sphere itself offers 'a normative category for political critique' (Hohendahl 1979:92). Although the Delhi rape case prompted a change in the relationship between the government and citizens, the output of the media has remained relatively consistent due to its reliance on police reports as a source of primary information. The Indian police are notoriously misogynistic and patriarchal (Nelson 2013). Therefore, in order for the media to more beneficially adapt its reporting style, the realm of discourse needs to be distanced from first information reports as an original source of subject matter. Accordingly, this chapter will first problematize the issue of police reports as a source of information. It will then discuss the need for renegotiating the public sphere as an alternative mode of discourse is emerging in the rise of social media.

5.1. Problematizing police reports

As the majority of rape articles featured in newspapers derive from police reports, the role of the police is substantial in how both victims and perpetrators are constructed. Campbell (2008) argues that in media reports, the victim goes through a 'secondary rape' as she is victimized at the hands of a patriarchal institution that reinforces hegemonic masculinity. Due to the misogyny of the Indian police, this study argues that victims undergo a third victimization, or a thrice-induced symbolic annihilation. The intermediary role of the police in lodging rape complaints allows them to attribute their own social preconceptions regarding sexual violence into the report. Thus, after suffering at the hands of the offender, women are victimized by the police with the suppression of their voice and story. This is then translated into the media as a factually based, un-bias truth and digested by the public. This cyclical nature reinforces the existence of an unquestioned and persisting patriarchal consciousness dictating ascriptions of womanhood and her place in society.

Rape is widely under reported in India (Pazzanese 2013). The general police hesitancy to lodge rape cases means that many genuine victims do not report rapes because of fear of humiliation or social pressure. This ultimately creates a class-bias as those victims from economically challenged backgrounds are often accused of ulterior motives such as seeking compensation, which reduces the turmoil of their assault. In December 2011, V. Dinesh Reddy, the director general of police in Andhra Pradesh, publically claimed that victims are often 'offenders' due to their 'skimpy dressing' provoking rapes and other atrocities (Das 2011). Such a misogynistic attitude is a continuing refrain amongst police officials, as even a year later an article appeared in *TOI* with

the headline, 'Cops reveal bias against rape victims' (2012b). The police have been accused of having a 19th century mindset with regards to women, which sees them as provokers rather than victims. An undercover operation by investigative journal *Tehelka* found that 'rampant prejudices as well as culture, class and gender bias [make] cops blame the rape victim rather than the rapist' (ibid.). This mentality emphasizes and legitimizes the rape myth that manifests itself in media representations of such violence.

The hesitancy and overt misogyny of the police has waned slightly however in the aftermath of the Delhi rape case. Due to social protests, the police have been forced to admit that social stigma is a major problem for rape victims. Thus, there was a movement to increase training and sensitization in handling these cases of gender insensitivity (Patel 2014:37). The decrease in the presence of medical examinations to verify rape in news articles suggests a slight change in social attitudes by the police and the media.[13] Reliance on medical evidence is both regressive and demoralizing for the victim. Studies of rape coverage in the UK during the early 1980s highlights the abandonment of medical verification as the primary evidentiary support to convict rapists paralleling the rise of feminist protest against such insult (Temkin 1998). In comparison to the Western world, medical tests are still much more prevalent in Indian media reports of rape, highlighting the misogyny inherent to police institutions as well as the patriarchal imperatives governing media reporting. Although there has been a slight dissipation of misogynist attitudes, it is not enough to redefine media output. The isolated coverage of assaults against

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[13] Pre-Delhi rape, 68.85% (n=142) of rape reports confirmed rape by medical examination. This decreased to 34.28% (n=73) after the Delhi rape.

women ignores the structural problem in society. Instead, gendered inequalities in society are trivialized, as they become a product of the commodification of grievances.

5.2. A new space for discussion; the rise of social media

The rise of social media in the Indian mediascape is a relatively uncharted territory. Bélair-Gagnon et al.'s (2013a) study follows the changing trends in social media as a response to the Delhi rape case specifically. It would seem that social media is indeed creating an alternative public space for discussion that transcends the inherently patriarchal confines of the news print industry and the misogyny of police reports as primary sources. Castells (2007:246) argues that 'the diffusion of Internet, mobile communication [and] digital media...have promoted the development of horizontal networks of interactive communication that connect local and global in chosen time'. Globally, there has been a trend in this rise of multi/digital platforms. In a country where only 11% of the population have internet access and fewer than 5% use social media (Bélair-Gagnon et al. 2013b), whilst social media may add to and alter debates in India's public sphere it is only available to a rarefied segment of the population. The digital divide thus may be transposed onto the socio-cultural divide. Although catering to a small minority, social media positively encourages new people into debates and discussions about women's issues such as rape, as well as distancing media reports from the sometimes-biased first information reports of the police. In proving a medium of expression independent of institutional mechanisms, gender may be constructed in a more neutral manner.

The increased use of social media gives rise to the voice of "netizens".[14] Through citizen driven journalism, social media is creating a new platform through which the public sphere is renegotiated. It allows a space to exert pressure on national government, as ordinary citizens are able to express anger and outrage at the failures of political elites, the government and institutions to prevent such crimes against women. Thus, Internet technology has the 'potential to enrich civil society in the face of severe challenges…[and] is likely to exert increasing influence in India's public sphere' (Sonwalkar 2009:380). Recent studies have found that the rise of social media used in coverage of the Delhi rape case allowed activists and journalists to discuss the growing issues in a new medium (Bélair-Gagnon et al. 2013a; Rao 2013). Therefore, social media usage has so far been rearticulated in pre-existing journalistic practices. India's public sphere is evolving to include not only communicative aspects of mass media but also nascent aspects of a networked society, where spatial arrangements are being re-conceptualized due to the rise of multi-modal communications in social media.

Rao (2013) argues that the Delhi rape gave rise to a middle-class voice of protest. Similar to newsprint, social media reflects the ideas of a stratified segment of society, which includes city-based women's groups, activists, university students and intellectuals. Problematically however, this ignores the intersectional nature of women's oppression and aggregates experiences of different castes and classes under the broad category of 'women's issues'. Sharma and Gupta (2004:114) argue that sexual violence transgresses the

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[14] A portmanteau of the English words Internet and citizen, "netizens" refers to people who are actively involved in online communities or users of the Internet.

boundaries of 'caste, class, region or religion and is prevalent in almost all societies'. Whilst the overall prevalence of sexual violence may be true, media representations have a class bias that is unrepresentative of the Indian social reality. It reports a singular conception of rape that satisfies a middle-class ideology of appropriateness and normative gendered behavior, which fosters a sense of detachment and antipathy towards the trauma of lower-class women. Although social media may provide future possibility for improving India's public sphere, at the moment it is still a marginal medium of expression that endorses inclusion and prevents representativeness.

6. CONCLUSION

As this study has shown, there have been qualitative changes in the media landscape in response to the growing unrest in Indian civil society. This is most evident in the collective coverage of women's issues. Visibility is multi-faceted however. Alongside increased coverage of protests for gendered justice and critiques of institutional failings, this research has found that the way in which gender is constructed within rape reports has experienced minimal change. Rather, the media implicitly propagates the notion of women as a secondary sex by repetitively relegating them to the private sphere and covertly perpetuating patriarchal ideology.

Sen (2013:10) argues that free press is a necessary component for a country's development. India however ranks 140th out of 179 in the press freedom index (*World Press Freedom Index* 2014). Whilst private control of the media burgeoned with liberalization, its capitalist orientations have hindered un-bias portrayals of certain issues. The "Murdochization" of Indian media has subsequently inhibited news production. Sensationalist portrayals of women in rape reports trivialize the severity of violence. Victims are commodified by their newsworthiness and their story becomes a product for middle class consumption. Men too are increasingly hyper-masculinized in their portrayal. This 'drive-by' journalism (Khan 2010) systematically displaces blame from the complex social structures and ideologies that condone women's oppression.

In only analyzing two English language dailies, the findings of this study are neither exhaustive nor reflective of the Indian social reality. As both *Times of India* and *Hindustan Times* espouse a middle-class ideology, inclusiveness of issues remains exclusive to urban, educated, middle and upper classes. However, the media's content is tailored towards those in agenda setting and policy-making positions. Therefore, although the readership may account for a small percentage of the population, there are national implications. Changes in gender construction have the potential to highlight structural deficiencies in Indian society, which may have legislative, judicial and social consequences. The media's neglect of rural women's issues, where rape is often a symptom of caste oppression, forms an area for further research. By extending analysis to regionally based newspapers, the study may dilute the urban bias of current Indian media scholarship and provide a more holistic view of women's perceived role in society. Whilst it was not within the scope of this study, it is worth undertaking fieldwork to investigate the imperatives that guide editorial decisions as well as examining how styles of rape reporting accommodate the changing discourses emerging within civil society.

Given the media's importance in influencing social perceptions, changes in the construction of gender have the potential to challenge the culturally ascribed notions of womanhood that condone gender injustice. Whilst previous literature has commended the progressive changes of Indian media following the Delhi rape, this investigation emphasizes the superficiality of such change. It has highlighted the need for the media to use rape reporting as a means to overtly acknowledge the systematic structural inequality within Indian society in order to further the process of women's emancipation. (9,985 words)

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