IOSR Journal of Humanities and Social Science (IOSR-JHSS)
Volume 30, Issue 6, Series 1 (June, 2025) 74-80
e-ISSN: 2279-0837, p-ISSN: 2279-0845.
www.iosrjournals.org

A Comparative Analysis of Legal and Societal Challenges to Women's Leadership in India and the UK

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Research Question: How do legal and societal barriers to women's representation in leadership positions compare between India and the UK, and what lessons can be drawn to enhance gender equality in leadership?

Abstract

This paper examines the legal and socio-cultural barriers limiting women's representation in leadership positions in India and the UK. Through a comparative analysis, it evaluates the effectiveness of legal frameworks such as the Human Rights Act 1998 (UK) and Articles 14-16 of the Indian Constitution, assessing their enforcement and impact on gender equality. The study also explores societal factors - including gender stereotypes, patriarchal norms, and workplace cultures - that continue to restrict career advancement for women. Findings indicate that while the UK faces intersectional discrimination and androcentric workplace norms, India struggles with weaker law enforcement and deep-seated patriarchal structures. Despite differing socio-economic contexts, both countries exhibit persistent pay gaps, limited political representation, and inadequate maternity and sexual harassment prevention policies. The study concludes that achieving gender parity in leadership requires not only stronger legal mechanisms but also socio-cultural shifts to dismantle systemic biases and promote equitable professional environments.

Key Words: *gender equality, women's leadership, legal barriers, socio-cultural norms, workplace discrimination*

Date of Submission: 24-05-2025 Date of Acceptance: 05-06-2025

I. Introduction

Imagine this: a prey caught in a spider's web feeling restrained, panicked, and frustrated as it struggles to free itself from the sticky strands that incarcerate it. Well, women anywhere around the world don't have to imagine such a scenario; they live it every day. Women, too, are caught in a sticky web of legal and societal strands spun over centuries that constrict their progression.

Gender inequality is discrimination on the basis of gender, causing one gender to be routinely privileged over another. Even though women have higher enrolment and graduation rates in college, more often than not, it's men who end up in positions of power and influence (Nietzel, 2024). LinkedIn's Economic Graph data reveals that women comprise 42% of the workforce globally. However, they only hold 31.7% of senior leadership positions (Jha and Bharti, 2024). Gender parity in political life is far off as well. According to statistics published on UN Women (2024), there are only 15 countries in the world where women hold 50% or more of the positions of Cabinet Ministers, only 19 countries have a woman head of state, and only 17 countries have a woman head of government. Globally, there are 21 states in which women account for less than 10% of parliamentarians in single or lower houses, including two lower chambers with no women at all.

India and the UK, although contrasting with regard to their level of development, both prove to be examples of countries still actively facing issues regarding gender inequality in the workplace as well as the political diaspora. In India, though there has been an overall increase in the representation of women across the workforce over the years, only 18.3% of women hold leadership roles in 2024, out of which just 8% are CEOs (Jha and Bharti, 2024). In the UK, 11% of FTSE 100 companies had a female CEO, compared with 4% among FTSE 250 companies in the year 2023 (Clark, 2022). The Indian political sphere is no exception to gender inequality. The ECI reports that women represent 10.5% of all members of parliament, and for the state assemblies, female MLAs represent 9%. Across the ocean, in the UK, there are 263 (out of 650 total members) female MPs in the House of Commons, while the House of Lords has 228 female peers, but they represent a smaller proportion – 29% – of the House (781 sitting peers) (Pannell and Baker, 2021).

Gender inequality severely impacts developed countries like the UK and developing countries such as India. However, despite legal frameworks in both countries, some barriers still prevent women from achieving leadership roles. These barriers can be legal or societal. In light of the aforementioned, this research paper aims

to answer the question, **How do legal and societal barriers to women's representation in leadership positions compare between India and the UK, and what lessons can be drawn to enhance gender equality in leadership?**

This paper argues that while both the UK and India have tried to make progress in promoting gender equality through legal frameworks, certain inefficiencies combined with systemic inequalities and cultural barriers continue to limit women's representation in leadership roles.

The Impact of Legal Frameworks on Women's Leadership Representation in India and the UK

The UK and India constitutionally guarantee equality. The Indian constitution, for instance, guarantees equality regardless of gender, caste, creed, and religion through articles 14, 15, and 16. These articles are the fundamental rights of individuals, and citizens can seek justice in the Supreme Court in matters of violation of these rights. In India, Article 14 of the constitution emphasizes the rule of law, Article 15 ensures that the state does not discriminate against people, and Article 16 assures equal opportunities in matters of public sector jobs and also incorporates positive discrimination (Mahawar, 2023). Though articles 14-16 of the Indian constitution have provided a legal framework to promote equality, issues regarding the implementation of policies due to bureaucratic hurdles and the 'creamy layer' debate regarding reservation persists (Gupta, 2015). In the UK, The Human Rights Act 1998 (HRA) sets out fundamental rights and freedoms that everyone is entitled to. It incorporates the rights in the European Convention on Human Rights (ECHR), commonly known as 'the Convention Rights', into domestic British law. HRA has three main effects: one can seek justice in a British court if their human rights have been violated, public bodies must respect and protect human rights, and in practice, the parliament must make sure new laws are compatible with rights set out in the ECHR (Equality and Human Rights Commission, 2018). The UK government's Independent Human Rights Act Review found that the HRA is working well overall. In 2022, however, the government introduced the Bill of Rights to replace the HRA, aiming to "reform" rights laws and address perceived issues of foreign influence from the ECHR. In June 2023, the government decided not to proceed with the Bill of Rights Bill, recognizing that it would reduce the protection of human rights (The Law Society, 2022).

Both countries also have employment laws that affect women's career progression. As per the Maternity Benefit Amendment Bill, 2017, female employees in India are entitled to 26 weeks of paid maternity leave, which is an increase from the 12-week leave instated previously under the Maternity Act, 1961 (Forbes India, 2024). Paid maternity leave in the country implies that women are entitled to receive their average daily wage or salary during maternity leave. Compared to India, the UK has doubled the period of statutory maternity leave, where eligible employees can take up to 52 weeks' maternity leave. However, only six of these 52 weeks attract well-paid income replacement, at 90% of the previous salary; the next 33 weeks are paid but at a low flat rate (£156.66 per week), while the remaining 13 weeks are unpaid (UCL, 2023). Good maternity leave policies are detrimental to women's progression to leadership roles. However, when there's an insufficient period of leave, as in India, or income insecurity during maternity, as in the UK, women's career trajectories are severely disrupted because, in both cases, they are forced to return to work prematurely, which leads to stress and decreased performance.

Additionally, despite both countries implementing laws ensuring equal pay and representation, women are still paid less and represented less in specific positions than their male counterparts. In India, the Equal Remuneration Act 1976, provides for equal wages for men and women workers performing the same work or work of similar nature. The Companies Act 2013 also promotes women's representation (Rai, 2019). It mandates that a specific category of companies must include at least one woman director on their boards. However, according to Prime Database research of 2023, of the total 4,783 directors of Indian companies, there are only 885 women directors in Nifty 500 companies (T.S. Bureau, 2023). Furthermore, the Equal Remuneration Act's definition of 'same work or similar work' fails to account for the intrinsic value of work and the equal value of different natures of jobs. Additionally, it does not address the undervaluation of female-dominated jobs such as caregiving and domestic labor. Notably, section 16 of the act permits pay differences on a factor other than sex, giving rise to further ambiguity and lack of transparency. The Code on Wages, set to replace the act, while more gender inclusive, echoes the same principle as under the Act (Gopalakrishnan, Mohapatra and Swaminathan, 2024). In the UK, as set out in the Equality Act of 2010, men and women in the same employment performing equal work must receive equal pay unless any difference in pay can be justified. Positive action is a range of measures allowed under the act that can be lawfully taken to encourage and train people from under-represented groups to help them overcome disadvantages in competing with other applicants (GOV.UK, 2023). That being said, in the UK, the median hourly pay for full-time employees is 7% less for women than for men (Office for National Statistics, 2024). Such a situation hinders women from investing in career development opportunities.

Another factor that hinders women's representation in leadership roles is potential discrimination against them. With regard to this, specific laws have been developed and implemented in both countries. The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), for example, is often described as the international bill of rights for women. It defines what constitutes discrimination against women and sets up an

agenda for national action to end such discrimination. Both the UK and India ratified CEDAW in 1986 and 1993, respectively (UN Women, 2009). The Equality Act 2010, which replaced previous anti-discrimination laws, legally protects people from discrimination in the workplace and wider society in the UK (GOV.UK, 2010). Section 106 of the act also requires political parties to collect and publish diversity data on election candidates, promoting political diversity (Centenary Action, UK, 2022). India, too, has anti-discrimination laws which prevent gender discrimination. The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (PoSH) protects women from sexual harassment at their workplace (Department of Women and Child Development, India, 2024). Women's Reservation Bill 2023 also aims to promote women's political representation by reserving one-third of all seats for women in the Lok Sabha and state legislative assemblies (UN Women, 2023). However, anti-discrimination laws in the UK and India have their shortcomings. According to the Fawcett Society and Young Women's Trust's report on The Equality Act, 'factors such as race, faith, ethnicity, age, disability, sexuality, location, and employment status can combine with gender to create distinct and particularly troubling experiences of discrimination and inequality.' This means that women are placed in the unenviable and tenuous position of having limited or no recourse against multiple discriminations they experience (Mos-Shogbamimu, 2018). In India, the Supreme Court has flagged serious lapses in the implementation of PoSH to protect women from sexual harassment in workplaces, calling for its robust and efficient implementation (Munjal, 2023). In the political domain, the provision of reservation of one-third of seats as set out in the Women's Reservation Bill is inadequate owing to the fact that women make up almost half the population in India.

Non-Legal Barriers to Women's Leadership in India and the UK

Beyond legal frameworks, socio-cultural factors such as gender stereotypes perpetuate inequality as they limit women from achieving leadership roles. These stereotypes are created and reinforced by gender norms and can lead to biased judgments and discrimination against individuals who do not conform to them (United Way NCA, 2023). As men have been leaders for so long, the traits associated with leadership are often thought of as masculine and not viewed as favorably when exhibited by women (American Association of University Women, 2020). In India, traditional gender norms still hold sway among large segments of the population: roughly a third of adults believe childcare should be handled primarily by women (Pew Research Center, 2022). In the UK, over half of Brits believe gender stereotypes exist within society, and almost two in four think that such stereotypes are essential and serve a purpose within society (Jacobs, 2023).

In India, family structure, as well as cultural beliefs, encourage gender roles. Traditionally, in Indian society, there has been a strong presence of patriarchal norms that classify women primarily as caretakers or homemakers responsible for the family domain while men are responsible for the work domain and act as financial providers. Often, women cannot pursue professional careers post-marriage without spousal support. Moreover, if they pursue a career, they are expected to manage work, housework, and children, something their male counterparts aren't burdened with (Chaudhuri, Muduli, and Arora, 2018). The discriminatory institution of caste, rooted in ancient Hindu texts, also obstructs the pursuit of leadership in women. Women belonging to 'low castes' (16.68% of the female population) experience a kind of 'double discrimination'— they are subjected to violence, acute discrimination, and inaccessibility to education, among other things (Sabharwal and Sonalkar, 2011). Even in the realm of politics, in India, even if women do get into politics, there is rarely a higher position of authority, such as the Chief Minister. Women ministers' five most commonly held portfolios are Family, children, youth, elderly, and disabled. This fuels the notion that women can only fit a particular portfolio or job, which reinforces the entrenched nature of gender stereotypes (Rae, 2021). On the other hand, while the UK has made progress in terms of challenging gender norms, traditional gender roles still exist in some sectors. 41% of women provide care for children, grandchildren, older people, or people with a disability compared to 25% of men. Moreover, 85% of women cook and/or do housework daily compared to 49% of men (Phipps, 2021). In the UK, voters associate executive leadership with stereotypically masculine traits, which makes it difficult for women to access and succeed in executive branch roles (Savat, 2024).

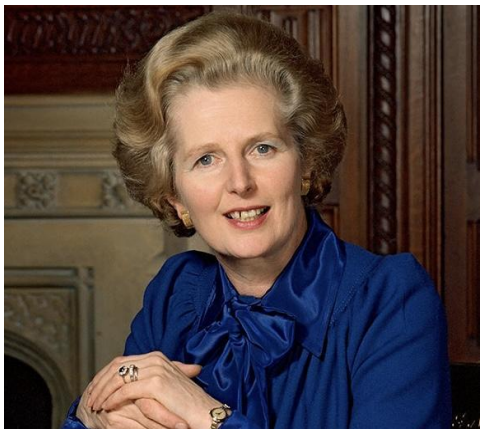
Workplace culture and political environments continue to pose significant barriers for women. In India, the biases against women are much more explicit compared to the UK. A stark example of this is the prevalence of workplace harassment. In FY23, companies reported 1,160 sexual harassment cases, but only a little over half were resolved, raising concerns about accountability (Varghese, 2024). Even more troubling is the fact that these reports come from only a fraction of companies, pointing to widespread underreporting due to fear of retaliation, stigma, and lack of awareness about legal protections under the PoSH Act (Chawla, 2024). Many women, especially in male-dominated fields, hesitate to speak out, fearing social ostracization or career stagnation. The situation is just as dire in politics. 45% of women in Indian politics report facing physical abuse, while 49% face verbal abuse (Bansal and Agarwal, 2025). Women politicians often encounter gendered scrutiny, with their personal lives, marital status, and physical appearance being excessively discussed rather than their political competence. The entrenched patriarchal mindset discourages women from asserting leadership, often relegating them to token positions or pressuring them to conform to submissive roles. Economic discrimination further

exacerbates gender inequality. The gender pay gap in India is deeply tied to the urban-rural divide. Over 60% of rural women work in the informal sector, where weak enforcement of wage laws and the absence of job benefits leave them vulnerable to exploitation (Roy, 2024). Even in urban settings, women face unspoken cultural expectations that limit career advancement. Many women are expected to prioritize family over professional ambitions, leading to lower workforce participation and slower career progression. A 2021 survey found that 85% of Indian women believe they have missed out on raises, promotions, or job offers solely due to their gender (Desai, 2021). This reflects not just workplace biases but a broader societal perception that views men as primary breadwinners and women as secondary earners, regardless of qualifications or performance. Additionally, networking and mentorship opportunities - crucial for career progression - remain male-dominated, further limiting women's access to leadership roles.

In the UK, regardless of laws, the gender pay gap remains a persistent issue, with the average woman working full-time earning 92p to a man's £1 (Deloitte UK, 2024). In addition to pay disparities, workplace harassment is alarmingly common. A TUC poll of 1,000 women found that 3 in 5 had experienced bullying, verbal abuse, or sexual harassment at work, with this figure rising to 2 in 3 among women aged 25 to 34 (Clarke, 2024). These challenges extend beyond corporate workplaces into politics. Reviews by Dame Laura Cox, Gemma White QC, and Naomi Ellenbogen QC have exposed widespread bullying and harassment in Parliament, a lack of effective complaint procedures, and a deeply entrenched patriarchal culture. One in five individuals working in Parliament reported experiencing sexual abuse (Stowers, 2022). Beyond immediate workplace and political struggles, long-term career progression is also impacted. Among MBA graduates, only 12% of women aspired to boardroom positions five years after graduation, compared to 22% of men (Weiser, 2021). This gender confidence gap is rooted in early social conditioning, where expectations and experiences shape self-perception. Research suggests that a lack of confidence leads evaluators to form pessimistic beliefs about women, creating a cycle where women internalize this bias and become less self-assured (Exley and Nielsen, 2024). When women display leadership qualities such as assertiveness, they often face negative perceptions, whereas men exhibiting the same traits are viewed positively. This reflects the androcentric nature of corporate culture, where masculine viewpoints dominate and set the standard for leadership (Walton, 2024). Further compounding these challenges is the lack of networking opportunities. The Rose Review of Female Entrepreneurship found that fewer than one in three women surveyed knew an entrepreneur, compared to 38% of men (Superscript, 2020). Limited access to professional networks restricts women's opportunities for mentorship, career advancement, and business growth.

Case Studies of Women in Leadership

MARGARET THATCHER



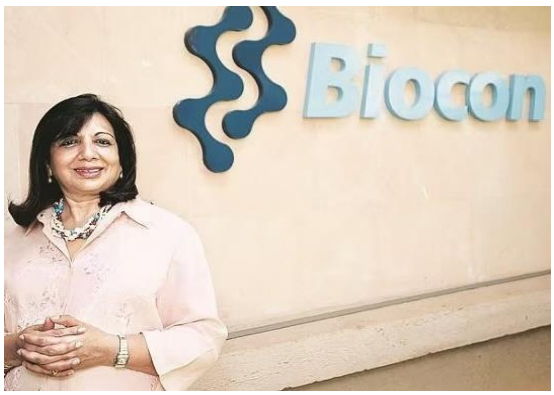
Margaret Thatcher, born on October 13, 1925, in Grantham, England, was a pioneering British politician who became the first female Prime Minister of the United Kingdom, serving from 1979 to 1990. Before her premiership, she studied chemistry at Oxford University and later trained as a barrister. Thatcher was elected as the Member of Parliament for Finchley in 1959 and quickly rose through the Conservative Party ranks, becoming its leader in 1975 (Young, 2019).

Thatcher's rise in British politics occurred during a period when women faced significant societal and legal barriers. Although women over 30 were granted the right to vote in 1918, and the right to stand for Parliament followed shortly after, local party associations were reluctant to select female candidates for winnable seats, often due to their gendered selection criteria. Thatcher herself encountered such biases; during a selection panel, she was questioned about how she would balance the demands of politics with her responsibilities to her young family. No such question was asked about a male rival with four children under ten. Throughout her career, Thatcher also attracted media attention as a woman in an overwhelmingly male political environment; however, she was able to turn this media attention to her advantage. Jim Prior described how Thatcher turned the gentlemanly culture of politics (unable to raise one's voice to and engage in an argumentative style with a woman) to her advantage, 'A few tears occasionally, the odd tantrum, then a bit of coquetry were all permissible' to win an argument. Many of her male Cabinet colleagues did not know how to respond once the political game came to be played by these very different rules (Griffin, 2013).

Margaret Thatcher's journey highlights the limitations of legal equality alone in achieving gender parity in leadership roles. While formal legal barriers to women's political participation in the UK had been removed by

the time she entered politics, her experience proves how societal norms such as stereotypes as well as institutional biases continued to obstruct women's progress. Thatcher's rise to power was a testament to her individual determination and ability to navigate these challenges, but it also revealed the inadequacy of legal frameworks to address deeper structural inequalities. Her tenure demonstrated that without proactive measures - such as gender quotas, mentorship programs, or policies to combat unconscious bias - legal equality does not automatically translate into substantive equality.

KIRAN MAZUMDAR-SHAW



Kiran Mazumdar-Shaw, born on March 23, 1953, in Bangalore, India, is a pioneering biotech entrepreneur and the founder of Biocon Limited. She earned a degree in Zoology from Bangalore University in 1973 and later qualified as a master brewer from Ballarat University in Australia in 1975. Upon returning to India, she faced limited opportunities in the brewing industry due to gender biases, which led her to establish Biocon India in 1978. Starting in the garage of her rented house in Bengaluru with a seed capital of Rs. 10,000, she built Biocon into one of Asia's leading biopharmaceutical companies (Hollar, 2024).

Mazumdar-Shaw encountered significant societal challenges as a woman entrepreneur in a male-dominated industry. Her initial attempts to secure funding were met with skepticism, with many banks hesitant to support her venture due to her gender and untested business model. A chance meeting with a banker at a social event eventually provided her with the necessary financial backing to launch her company (Egan, 2004). Recruiting talent was another hurdle; potential employees were reluctant to join a start-up led by a young woman in an unconventional field. Her first employee was a retired garage mechanic, and her initial operations were conducted in a modest 3,000-square-foot shed. Additionally, she faced infrastructural challenges, such as unreliable power supply and limited access to advanced research equipment, which were prevalent in India at the time (Chhajar, 2024). Mazumdar-Shaw has often spoken about the credibility challenges she faced, primarily due to gender-related biases. She noted that it was challenging for a woman to build a successful business, emphasizing the societal prejudices that questioned women's capabilities in leadership roles (Mitra, 2023).

Despite these obstacles, Mazumdar-Shaw's resilience and innovative approach led Biocon to become the first Indian company to manufacture and export enzymes to the U.S. and Europe within a year of its inception. Her journey highlights how persistent gender stereotypes and cultural biases, along with insufficient legal frameworks such as a lack of policies for women entrepreneurs to gain access to capital, talent and technology, still prove to be a challenge for women who want to make a name for themselves in India's traditionally patriarchal corporate sphere.

II. Conclusion

Gender inequality continues to persist in the UK and India. While both countries have attempted to promote gender equality through the creation of laws and acts, inefficiencies in their implementation, systemic inequalities, and socio-cultural barriers continue to limit women's representation in leadership roles.

Both India and the UK guarantee equality through constitutional and legal frameworks, yet challenges persist in ensuring women's representation. The UK's Human Rights Act 1998 and India's Articles 14-16 promote equality, but India faces implementation issues while the UK grapples with intersectional discrimination. Furthermore, maternity leave policies in both countries fail to balance career progression with family responsibilities, while equal pay laws struggle to close gender pay gaps. Political representation also remains limited, with India's Women's Reservation Bill providing insufficient quotas and the UK relying on voluntary diversity measures.

Socio-cultural factors such as gender stereotypes further limit women's access to leadership roles in both the UK and India. In India, patriarchal and caste-based norms heavily influence gender roles, restricting women's career opportunities. At the same time, the UK has made progress in challenging norms, but traditional gender roles persist, with women shouldering more caregiving and housework. Workplace cultures in both nations reinforce these barriers through pay gaps, harassment, and lack of representation. Cultural barriers in the UK stem from implicit biases and androcentric work environments, whereas in India, they are more explicitly rooted in deep-seated patriarchal and caste systems. These systemic biases perpetuate inequality across both nations.

Legal and cultural barriers to women's representation differ between the UK and India; however, the gap is not as wide as one might expect, despite the UK being a developed country and India a developing one. To

move forward, both legal frameworks and socio-cultural attitudes in both countries need to evolve, ensuring that women can achieve leadership roles without having to constantly prove themselves and with the same ease and opportunities as their male counterparts.

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