

EMPOWERMENT OF THE TRIBAL WOMEN REPRESENTATIVES THROUGH PANCHAYAT RAJ INSTITUTIONS: A DISTRICT LEVEL STUDY OF ODISHA

Written by Dr Banamali Barik

*Assistant Professor, Mayurbhanj Law College, Baripada under Madhusudan Law
University, India*

ABSTRACT

The India constitution declares that everyone is entitled to “justice, social, economic and political; equality of status and opportunity; and to promote among them all”. Article-15 (3) to the Constitution of India empowers the state to make special provisions for women. Following the passing of 73rd Constitutional Amendment Act by Parliament, of confirmatory legislation providing reservations to weaker sections of society like SCs, STs and women at all three levels of PRIs was implemented by all most all states of India including the state of Odisha. Therefore, the empowerment of the tribal women under reservation policy is one of the major achievements of panchayati Raj System. Now in Indian society, decentralization is the main tool by which democracy becomes truly representative and responsive. The three tiers system of panchayati Raj: Village level, Block level and District level ensures the delegation of power but the implementation of the development of plans, programmers and policies are affected due to traditional biases and prejudice, illiteracy & dogma. The study intended to explain the decision making of tribal women representatives while ensure of Government’s development plans, programmers and projects, and need for structure of Socio-economic, political and cultural rights of village peoples. Practically, tribal women representatives remain only for record sake and the real power is still enjoyed by the dominative male or local power-brokers and they are facing many problems in various angles while discharging their functions in local self-government. This area was chosen for study because the said area is mostly dominated by tribals, who also inhabit the Simulipal National Park. As per population projection (2011-2036) censuses, there are 749,089 females out of 1,479,576 total tribal population and 26 community

development Blocks, 382 GP and 3966 Villages covering in the district of Mayurbhanj. According to elective representatives in the district of Mayurbhanj under PRIs in the year of 2022, total numbers of women ward members- 2099 out of 3721(ST), total number of women Sarpanchs-227 out of 404 (ST), total number of women PS members 157 out of 268 (ST) and total number of women ZP members- 22 (including chair person) out of 43(ST).

Keywords: Gender prospective, Empowerment of women, Panchayati Raj, Self-government, Local elective representatives.

INTRODUCTION

“Achieving the goal of equal participation of women in decision making will provide a balance that more accurately reflects the composition of society and is needed in order to strengthen democracy and promote its proper functioning... Without the active participation of women and the incorporation of women’s perspectives at all levels of decision making the goals of equality, development and peace cannot be achieved”.

-Article-181 of Fourth World Conference on Women, Beijing, 1995.

Women constitute half of the population issue of political empowerment of women has attracted global attention. The United Nations adopted convention on the political Rights of Women in 1952. UN has also organized four World Conferences on Women. Fourth was held in Beijing in 1995 and it declared that women’s equal participation in decision making is not only a demand for simple justice or democracy but can also be seen as a necessary condition for women’s interests to be taken into account. It also affirmed that women should have at least a 30% share of decision making positions.ⁱ In this context, our The preamble has to promises equality of status and opportunity to all citizens and this ideal of equality embraces social, political and economic equality. In particular, the ideal of social equality is enshrined in a series of articles of which article-14 is genus, and the succeed articles 15 to 18 contain particular applications thereof.ⁱⁱ Article 243(D) of the Constitution provides for reservation for Schedule Casts (ST) and Schedule tribes (ST) in every panchayati in proportion to their population in that area. At least one-third of the seats reserved shall be for women belonging to SC/ST communities. Following the provisions of the 73rd Constitutional Amendment, the state

Governments amended their state Panchayati Raj Act and made provisions for the reservation of seats for Dalits. The above constitutional provisions are giving to marginalized sections like tribal women and it had been a great change in the traditional political system in the country as well as in the state.

Odisha located on the east of India, it is one of the most unique places which have the largest number of tribal community with a population of 8.2 million constitution 22.3 percent of the state population. The tribal community is considered as the deprived section in the society, because they face so many problems such as land alienation, poverty and indebtedness, health and nutritional problems, educational problems and cultural problems. To solve all these problems and improve their standard of living in social, economic, cultural and political status through the various policies, programmes and plans of central as well as the state government. The 73rd Constitutional Amendment has empowered Gram Sabha at the village level, Panchayat Samiti at the block level and Zilla Parishad at the district level. The reservation was provided in favour of SC, ST, OBC and women in respect of all seats. The tenure of Panchayat was fixed for five years. Election Commissions and Finance Commission were constituted. The power and function of Gram Sabha and Palli Sabha were redefined.ⁱⁱⁱ

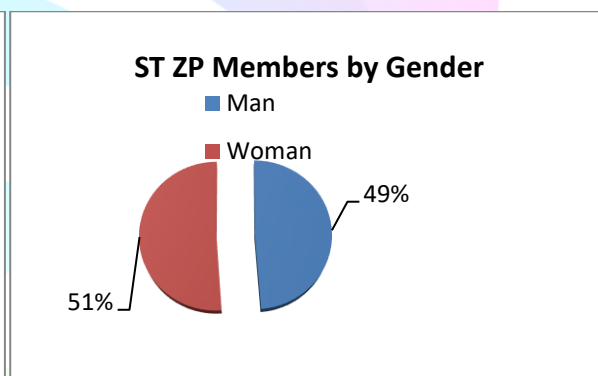
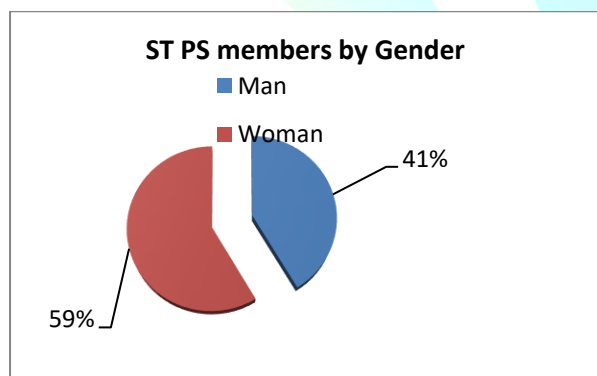
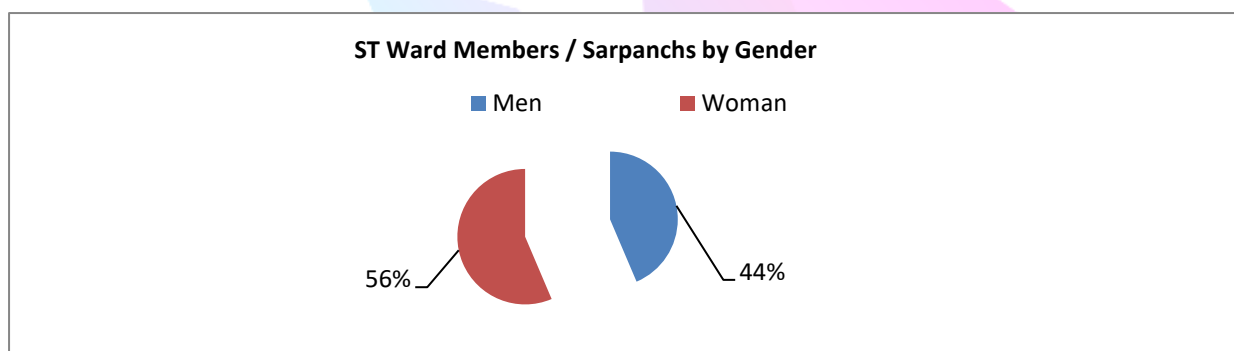
According to District Census Handbook (COI-2011) for administrative set up, the Collector and District Magistrate is the administrative head of the district. For effective administration of the district, he is assisted by Additional District Magistrates, Deputy Collectors, Sub-collectors, Block Development officers, Tahasilders and other officers of the Mayurbhanj district in the state of Odisha. There are 4 sub-divisions in the districts viz. Baripada, Bamanghati, Kaptipada and panchapirh. Each sub-division is under the administrative control of a sub-collector. For convenience of revenue administration, the district is divided into 26 Tahasils, viz. Bahalda, Rairangpur, Baripada, Rasagobindapur, Betanati, Barasahi, Udala, Karanjia, Raruan, Tiring, Jamda, Bijatala, Kusumi, Bisoi, Samakhunta, Bangiriposhi, Saraskana, Kuliana, Suliapada, Muruda, Kaptipada, Gopabandhunagar, Khunta, jashipur, Thakurmunda and Sukruli. There are 26 Community Development Blocks in the district. To look after the development activities one Block Development Officer is appointed in each Community Development Block. The number of Grampanchayats (382) and Villages (3966) are under each Community Development Block.

“The village will be self governed in such a way where people will discuss, take decision and implement and no external intervention among them. It was the dream of Gandhiji’s about Gram Swaraj” - MAHATMA GANDHI

“We are unleashing or attempting to unleash the greatest latent powers of the people by giving an authority to Panchayati Raj.” – BIJU BABU

Elected tribal women of ward members, Sarpanchs, PS members and ZP members in respect of study area are below:

Elected representative (2022) in ST Categories under PRIs, Mayurbhanj, Odisha



Source: District Panchayati Raj Office, Mayurbhanj, Odisha

The provision of Fifth and the Sixth Schedules of the Constitution through provided autonomous political structure did not help much as the majority of tribals remained at the periphery of the wider socio-economic and political system. The extension of panchayati raj to the Scheduled Areas is an attempt towards providing self rule to manage the challenges of development to the tribal people through their own panchayats. However the 60% to 70% percentage of tribal population is covering the study area. Therefore, the tribal women

leaderships/empowerment is an opportunity for transforming local governance by sensitizing the State to issues of poverty, inequality and gender injustice. The present paper focuses on the profile, performance, quality leadership, and decision making capacity the of tribal women representatives as different from others and their development and challenges in day to day functioning works.

HISTORICAL EVOLUATION OF PRIs ON TRIBAL WOMEN REPRESENTATIVE

India has the largest concentration of tribal people anywhere in the world except perhaps in Africa. The tribals are children of nature and their lifestyle is conditioned by the ecosystem. India, with a variety of ecosystems, presents a varied tribal population throughout its length and breadth. The areas inhabited by the tribals constitute a significant part of the underdeveloped areas of the country. The tribals live mostly in isolated villages or hamlets. A smaller portion of their population has now settled in permanent villages as well as in towns and cities. On the whole, as per rough estimates, the prominent tribal areas constitute about 15 percent of the total geographical area of the country.

There are 533 tribes as per notified Schedule under Article 342 of the Constitution of India, in different states and Union Territories of the country, with the largest number of 62 being in the State of Odisha. The tribals remain the most backward ethnic group in India. For the predominantly tribal Scheduled-V area of Central India, the Government had passed an Act, "The Provisions of the Paanchayats (Extension to the Scheduled Area) Act, 1996 (PESA)". It came into force on the 24th December 1996 and is currently in force in nine states such as Andhra Pradesh, Jharkhand, Gujarat, Himachal Pradesh, Maharashtra, Madhya Pradesh, Chhattisgarh, Orissa and Rajasthan. The Act intends to enable tribal society to assume control over their own destiny to preserve and conserve their traditional rights over natural resources. PESA is unprecedented in that it gives radical self-governance powers to the tribal community and recognizes its traditional community rights over natural resources.^{iv}

In the year of 1991, three land mark legislature were enacted to facilitate devolution of power to the PR bodies to bring about rural development through people's participation and co-operation. The elections for PR bodies were held in 1992. A new social, revolution in rural

Odisha ushered and one-third seats were reserved for women in all the tiers of PR bodies.^v In Odisha, the 73rd Amendment Act and its important provisions were incorporated through confirmatory legislation and fresh elections were held in 1997. The 73rd Amendment of the Constitution has conferred legislation and constitutional status to PRIs. Over the past five decades, PRIs have emerged as the powerful institutions in bringing about rapid and sustainable development and socio-economic transformation in rural Odisha. Over viewing some of the empirical works on empowerment of women in Panchayati Raj system in Odisha, specifically works of Snehalata Panda (1996,1999), Bidyut Mohanty (2002), Dayanidhi Parida (2010), it is revealed that:

- The women who reluctantly entered into politics showed great maturity in outlook, enthusiasm, increasing political consciousness and increasing perception of their role and responsibility.
- Due to strong cast feeling women belonging to upper cast have not come forward to represent the Panchayat which provided an opportunity to the women from the labour and lower cast to emerge as a potential force in village politics.
- About 80-90 percent of women attend the panchayat meetings regularly. Given the sure number, one might conclude that the democracy has become participatory than before at least at the grass root level.
- The socio-economic background of these women showed that majority of them came from the lower income group particularly at the village Panchat level.
- The working culture of the Panchayat has changed because of the presence of the women.
- A part of the increase of the female literacy rate on attribute to the presence of the women in Panchayat and their willingness of get educated.
- The standard of political institution at the grass root level has not been lower because of women reservation.
- Women are not only working for women's development but also really putting their interest in general matters and getting success also, so, the concept that women cannot lead in developmental process is found wrong.
- With great effort the women leaders did the development works and the files were maintained perfectly and the government institutions were followed with greatest care.

- The involvement of women leaders in different developmental work definitely increased their awareness and confidence in themselves.^{vi}

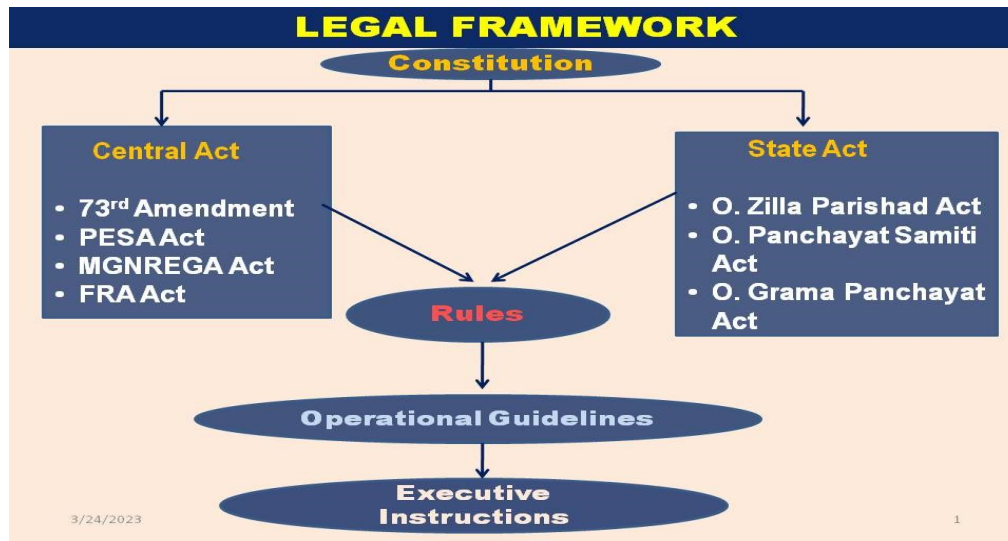
The Odisha PR Department and the United Nations Entity for Gender Equality and Empowerment of women (UN, Women) have signed an agreement for promoting women's political leadership and empowering the elected representatives in the local government. At present the programme is being implemented in six states, i.e. Andhra Pradesh, Bihar, Karnataka, Odisha, and Rajasthan. The main objectives of the programme are capacity building of the elected women representatives at the Gram Sabha Level, research and policy advocacy to address the legal and political issues pertaining to local-self governance and evolution of a centre of excellence.^{vii} Really a study done by the International Centre for Research on Women (ICRW) in the districts of the states of Rajasthan, Karnataka and Odisha 2012 revealed that elected representatives are limited both by lack of autonomy and by perceptions of their roles to respond.

But in different from other communities, tribal women are considered indispensable, especially for the role they play in the socio-economic life. There is difference of values related to morality regarding sex and sexuality and much lesser degree of stigma attached among the tribals. A women's entry into panchayat is similarly not opposed, at least not for the similar reasons. Among the tribals, besides the difference in value system, there is an additional factor, which it brings their family and community a status and respect, of which they were long denied. The men belonging to the higher castes, on the hand may perceive women's entry by 'allowing them to keep the seat safe for them.

LEGAL FRAME WORK RELATING TO PRIs

The Government of India had declared 2001 as the year of Women Empowerment by adopting a national policy to offer "*Swashakti*" to women. Several laws have also been adopted to empower women by socially, economically, legally and politically. In order to activate the Panchayati Raj institutions more and to confer them constitutional statute, Parliament passed the Historic Constitution 73rd (Amendment) Act on December 23, 1992 which came into being on April 24, 1993. Article 243 of the Constitution, which is the key to the whole scheme of

devolution, empowers state legislatures to endow the Panchayats with such powers and enable them to function as institutions of self-government.^{viii}



Source: <https://www.rotiodisha.nic.in>

The Panchayati structure as notified under the 73rd Amendment is required to be three-tier one with elected bodies at the village, block and district levels. While one-third of all the seats are reserved for women, reservations for the SCs/STs have been provided for in proportion to their population at each level. It introducing Article 243 (E), (O) and adding a new Part-IX to the Constitution is a major step in the direction of implementing Article 40 so as to provide Constitutional sanction to democracy at the grassroots level. The salient features of 73rd Constitutional Amendment are:^{ix}

- ❖ There-tier structure of Panchayats at village, Block and District level.^x
- ❖ Direct election of members of Panchayats at each level.^{xi}
- ❖ Five year tenure for every Panchayat and in case of dissolution elections to be held within 6 months.^{xii}
- ❖ Appointment of State Election Commission for each State.^{xiii}
- ❖ Appointment of State Financial Commission by every State to review financial position of Panchayats.^{xiv}
- ❖ Powers, authority and responsibility with respect to the preparation of plans and the implementation of schemes for economic development and social justice (including those listed in the 11th Schedule).^{xv}

- ❖ Power to impose taxes, funds and fees and raise funds.^{xvi}
- ❖ Reservation of seats for SCs/STs and reservation of 1/3rd of total seats for women.^{xvii}

In *State of U. P. v. Pradhan Singh Kshethra Samiti*,^{xviii} the Supreme Court held that the PRIs are only financially and administratively viable units which can undertake the schemes of development relating to matters mentioned in the Eleventh Schedule of the Constitution.

A new era set out PESA is constructed around the Gandhian concept of *Gram Swaraj*, the governance frame for the village republics. Gandhi's dream was included in the Constitution as Article 40, which came alive only when PESA was adopted. While the 73rd Amendment, which inserted Article 243, made the term gram (village) and gram sabha (village assembly) part of the Constitution for the first time. It gave shape to the concept of self-governance through empowerment following constitutional recognition of the competence of Gram Sabha.^{xix}

Therefore, PESA begins with the legal presumption that the gram sabha is competent and calls upon the state governments to ensure legal, procedural and administrative empowerment as a means of deepening democracy.

Table - 1

Growth of 3-tier PRIs : Odisha			
Year	GP	PS	ZP
1961-62	2350	214	13
1966-67	3826	307	13
1983-84	4391	314	-
1991-92	5263	314	-
1997-98	5263	314	30
2002-03	6234	314	30
2014-2019	6798	314	30

Source: Odisha State Panchayatraj Office, Bhubaneswar

PESA Act, (1996)^{xx} is built around six facets of democratization which means to rebuild *swaraj* the tribal area. They are:

- (I) The first facet is self-determination by a community of its human and administrative boundaries.^{xxi}
- (II) The second facet of Swaraj is the competency of the Gram Sabha to take safeguard and care for the interests of its member, preserve its natural and human resources, its material and non-material culture and ensure peace and well being.^{xxii}
- (III) The third facet is the legal enabling of the community to negotiate development and modernity founded on the bedrock of appreciation of its own culture and traditions.^{xxiii}
- (IV) The fourth facet is the onus on the onus on the state to recognize the competence of the community to takes steps to remedy its own ills and curb its own exploitation as required.^{xxiv}
- (V) The fifth facet is the accountability of the executive to the legislative or deciding body like the Gram Sabha. So this act provides for the accountability of PRI members and functionaries for execution of plans and programmes determined by the Gram Sabha.^{xxv}
- (VI) The last critical facet is the guarantee of ‘supremacy’ of the Gram Sabha in the exercise of its powers.^{xxvi}

Therefore, the above act lay at the feet of the state legislature and bureaucracy was too heavy to bear and though the requirement of conformity acts was reluctantly met by the state governments, nowhere can we say that the provisions are in actual practice.

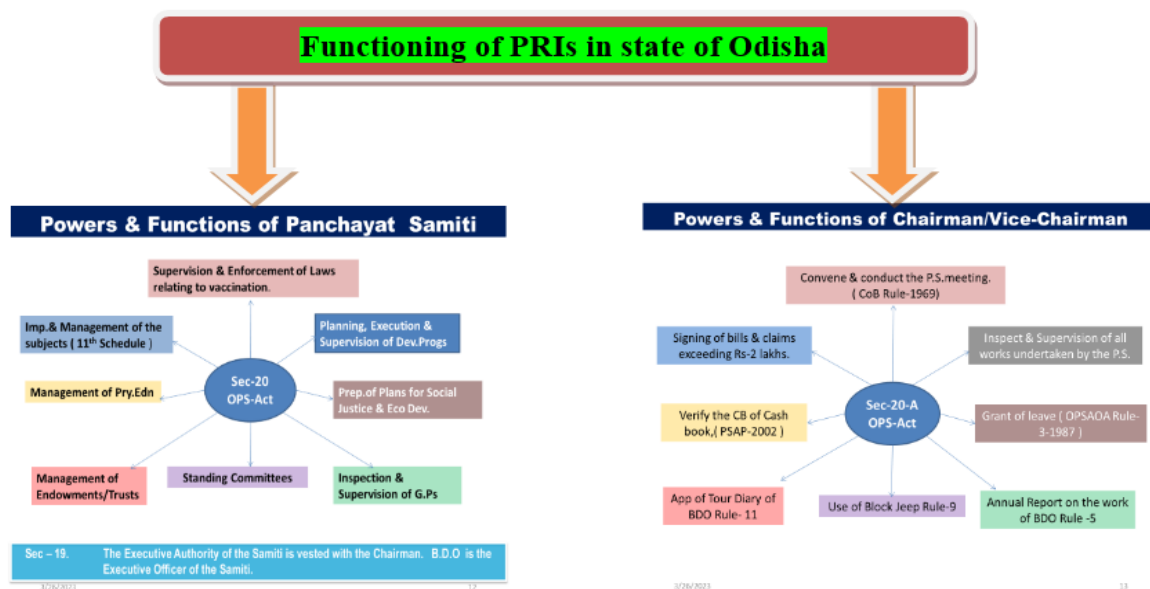
POWERS AND FUNCTIONS OF PANCHAYAT SAMITI AND CHAIRMEN UNDER PRIs, ODISHA

The 74th Constitutional Amendment Act, 1992 in XI schedule constitution of district planning committee. It would be a district planning committee at district level to consolidate the plans prepare by the panchayats and municipalities to prepare development plan for the district as a whole. The development plan work out in twenty nine subject: agriculture, land improvement, minor irrigation, animal husbandry, fisheries, social forestry minor forest produce, small scale industries, khadi village and cottage industries, rural housing, cultural activities, markets and

fair, health and sanitation, family welfare, women and child development, drinking water fuel and fodder, roads, rural electrification, non-conventional energy, social welfare, welfare of the weaker sections, public distribution system and maintenance of community assets.

Keeping of the above, the Zilla Parishad out 29 subjects required to be transferred to PRIs as the 11th schedule of the constitution and 19 subjects transferred to the control of it.

In Orissa, the Assemble passed the required conformity Act in 1994, 1995 and 1997 to set in place the present form of the three-tier system of Panchayat Raj consisting of Gram Panchayat at village level (GP) panchayat Samiti at block level (PS) and Zilla Parishad at district level (ZP). The present structure of Panchayat Raj system in Odisha and their function is described through graphic below:



Source: <https://www.rotiodisha.nic.in>

Gram Panchayats, panchayat Samities and Zila Parishads have given statutory powers under the respective acts and rules. Garam Sabha and Palli Sabha have given statutory recognition and powers for selections of beneficiaries under poverty alleviation schemes also. Empowered the Gram Ssbha in scheduled areas to enforce prohibition, control over money lending have ownership of minor forest produce and prevent alienation of land belonging to Scheduled Tribes. Government transferred ownership of 67 items of minor forest produce to the control of Gram Panchayats. Social audit made statutory for Gram Sabha to approve expenditure and

submission of utilization certificate. Gram Panchayat empowered to maintain assets, remove nuisance, regulate public utility, impose taxes and provide public distribution & other services.

Gram Panchayat empowered to maintain assets, remove nuisance, regulate public utility, impose taxes and provide public distribution & other services. Panchayat Samit empowered to deal in P.D.S look after social security measures, provide assistance to weaker sections, implement programmes relating to poverty alleviation, primary education, primary health, co-operation and calamity relief. Out of 29 subjects Zila Parishad required to be transferred to PRIs as per 11th schedule of the constitution, 19th subjects transferred to the control of Zilla Parishad.^{xxvii}

Apart from these functions, there are some obligatory and discretionary function of Gram Panchayat u/s 44 and 45 of Gram Panchayat Act. They are, “construction, repair, maintenance and improvement of public streets; lighting , water and cleaning of public street; construction, repair, maintenance of drains; construction, repair and maintenance of supply of water; scavenging and removal and disposal of filth; measures of preventing and checking of epidemic like covid-19 pandemic; protection and maintenance and development of all public properties; establishment, management and maintenance of common grounds, land of common benefit; supervision and maintenance of soil conservation works; regulation of fair and festivals; Implementation of schemes for social justice and economic development; management of minor forest produce, small scale industry, rural housing, poverty alleviation programme, women & child welfare programme, public distribution system.

And plantation, maintenance of village forest, management of slaughter houses, co-operative management, establishment of charity homes, akharas, club, and recreation centres, cottage industry, construction of Dharmasalas and Kalyan mandaps, organization of exhibitions, adult education and prevention of gambling.”

OPPORTUNITIES AND CHALLENGES OF TRIBAL WOMEN REPRESENTIVIES UNDER PRIs

The provision of Panchayat Extension to Scheduled Area (PESA) Act, 1996 came into force on 24.12.1996. The state In Odisha for the Scheduled are is known as Gram Ppanchayat (Amendment) Act, 1997 produced out of the Amendment of Odisha Gram Panchayat Act, 1984. The state panchayat laws namely, The Odisha Gram Panchayat Act, the Odisha Panchayat Samit Act and the Odisha Zila parishad Act were amended in conformity with provisions of the central Act within the scheduled time. Odisha and Madhya Pradesh are the only two states who have accorded statutory recognition to Gram Sabha in the light of section 4(e) of the Central Act. Reservation of Scheduled Tribe members in Schedule Areas where the state laws have been amended to provide a minimum 50 percent representation of ST members in each Panchayat. Provisions have also been made so that all officers or Chairpersons will be reserved for Scheduled Tribes. Powers of Gram Sabha modified after coming into force of PESA. Odisha is the first state to conduct an election as per the provisions of PESA in 2002.^{xxviii} There are seven districts fully and six districts partially are covered under the Scheduled Area of the state. The protective regulations are in force in the Scheduled Area of the state are:

- The Odisha (Scheduled Area) Transfer of Immovable Property (by Scheduled Tribe) Regulation, 1956 (Regulation 2 of 1956).
- The Odisha (Scheduled Area) Debt Relief Regulation, 1967 (Regulation 1 of 1968).
- The Odisha (Scheduled Area), Money Lenders Regulation, 1967 (Regulation2 of 1968) (Annual Report, 2002-03, ST & SC Development department, Government of Odisha).

Therefore, the reservation system was introduced the participation of weaker section like SC, ST and women has slowly found to be increased. Of course, over the years the number of panchayats, Panchayat Samitis and Zila Parishad has slowly found to be increased. Of course, over the years the number of Panchayats, panchayat Samitis and Zila Parishad has increased in the state.

In the Scheduled areas of the state spread over 1966 Gram Panchayats in 118 blocks in full and 3 blocks in part. Accordingly, 24, 734 wards out of 87'542 wards, 1,966 offices of Sarpanch out of 6234, 1965 office of Panchayat Samiti members out of 6233 and 256 members of Zila Parishad out of 854 come under the Scheduled Area. Election of these offices was conducted as per the Provision of the PESA Act.^{xxix}

Representation to women through the 73rd constitutional amendment in panchayati Raj Institution leads to empowerment of women in following aspect:

- Women are entering into politics with spirit and as dedicated citizens taking up as a challenge.
- Women leaders in the panchayati Raj are transforming local governance by sensitizing the state to issues of poverty, inequality and gender injustice.
- Women are contributing a lot through PRIs to tackle problem like water, alcohol, abuse, education, health and domestic violence.
- Because of good number of representatives are there in PRIs, importance is being given to the issues of women at local level.
- Elected women in Panchayati Raj Institutions are fighting against child labour and child marriage, dowry harassment.
- Women representative in villages are using their authority to provide better health care and quality education.
- Women through PRIs working for economic development by promoting Self-Help Groups., cooperatives and rural industries with a view to provide better employment opportunities in rural areas.^{xxx}

Elected Representatives can avail some key opportunities in their functioning works such as:

- Direct democracy;
- Equitable development in rural areas;
- Scope of training & capacity building through SIRD;
- Self –empowerment of people giving rise to self respect;
- Enhancing sense of belonging and well-being;
- Better service delivery through less government & more governance and
- Conservation & sustainable use of common property resources (CPR) like forest, tank, land etc. for maintaining in biodiversity.^{xxxi}

And ERs continue to face many challenges. These few important are:

- **Social & Political Constraints:** Illiteracy in Particularly women illiteracy and Surrogate representation & tokenism.

- **Caste System:** Hierarchical caste system in rural India makes it difficult for women from SC and ST communities to function independently and effectively.
- **Institutional Constraint:** Two children norm.
- **Inadequate Capacities:** Majority of EWRs enters into public life for the first time and does not have enough and skills to handle affairs of panchayats.
- **Resource Constraint:** Financial resources and human resources.
- **Poor Social Mobilization:** Less people's participation in Gram Sabha basically in women representatives. .
- **Digital Financial Transacting for greater transparency:** Banking network not available in all GPs specifically remote areas.
- **Capacity Building:** Socially distanced groups with no expertise or training.
- **Inadequate women panchayat functionaries:** patriarchal mindsets make it difficult for EWRs to freely interact with male functionaries at times when it is required.^{xxxii}

There are approximately 13.45 lakh Elected Women Representatives in PRIs which constitute 46. 14% of total ERs. The State-wise details are available at the website of Ministry of Panchayati Raj, Government of India.^{xxxiii} Therefore, EWRs overcome these challenges to be able to contribute effectively in bringing positive changes in rural areas. The Government of India along with State Governments has undertaken several initiatives to help them.

CONCLUSION

To sum up, PESA creates the golden opportunities for enabling participation and capacity building for the elected representatives and functionaries in their area. Odisha is the first state to conduct an election as per the provision of PESA in 2002, under Fifth Schedule to the Constitution of India and Schedule Area (1977), and three full districts: **Mayurbhanj**, Sundargarh and Koraput have been declared as schedule area. In this context, PESA, Act is not properly working in study area because maximum respondents are not aware of it, even after twenty years of adoption of the act. The tribal women need training for their empowerment and strengthening their competency for self- governance in the light of the modern democratic administrative system under PRIs.

Government of India and State Governments are putting in sincere efforts to strengthen elected tribal women under PRIs through the various programmes like Mahatm Gandhi-NREGS, DAY-NRLM, DDU-GKY, PMAY (G) (central), BPGY (state), Drinking Water & Rural Sanitation, GGY, RURBAN, RGSA- (C-60, S-40) etc. In this context, it can be mentioned that the total number of women ZP members- 21 out of 36(ST) in the result of 2017 PRIs election. During this period, the vital role to working out the schemes and projects were carried through elected representatives for handling the Covid-19 Pandemic situations. Due to failure of internet connection and lock down periods the decision making of tribal women representatives depended upon their husbands, relatives and local political broker.

Overall, the tribal women representatives are always at disadvantage as they are illiterate, lack of leadership qualities and remain submissive to their husbands in the *Simulipal* region of the study area. The above factors have helped husband take over the decision making, powers and functions of elected women. This is a major challenge in present century to the realizations of democratic decentralization of power in grassroots level and the empowerment of women in tribal communities in India.

ENDNOTES

ⁱ Rajput P, Women' political participation in India: An Agenda for Empowerment, , in Promila Kapur "Empowering the Indian Women" publications Division, Government of India.226-227 (2001).

ⁱⁱ Bashsher Nath v. CIT, Delhi and Rajasthan & Anr, AIR 1995 SC 149.

ⁱⁱⁱ In Odisha Palli Sabha is organized at the village level and the Gram Sabha is organized at the Gram Panchayat level. Statutory Gram Sabha meets minimum twice in a year during February and June and Palli Sabha meets minimum once, from the beginning of the year. Palli Sabha takes all important decision like selection of beneficiaries and preparation of schemes in the village and Gram Sabha consider and approve all such matters as referred to it by the Palli Sabha for its decision. In Palli Sabha minimum 1/10th and in Gram Sabha 1/3rd members present should be women.

^{iv} R.R. Prasad, Empowerment of Tribals for Self-Governance, 62 Social Actions Trust, 16-17 (2012).

^v Mandakini Naik & Tusarkanta Pattnaik, Participation of women in Panchayati Raj System in Odisha,3 I.J.R. 34 (2017)

^{vi} Id. at 35.

^{vii} Id. at 38

^{viii} Mushtaq Ahmad, Uzma Qadri & Nayeem Ahmad Bhat, Indian Bar Review, XLIV (1) 77, 91 (2017)

^{ix} Id. at 91

^x Id. at art.243B

^{xi} Id. at art. 243C

^{xii} Id. at art. 243E

^{xiii} Id. at art. 243K

-
- ^{xiv} Id. at art.243J
^{xv} Id. at art.243G
^{xvi} Id. at art.243H
^{xvii} Id. at art. 243D
^{xviii} AIR 1995 SC 1512
^{xix} R.R. Prasad, *supra* note 04, at 24
^{xx} The Provision of the Panchayats (Extension to the Scheduled Areas) Act, 1996, No. 40 of 1996 (India)
^{xxi} Id. at Section 4(b).
^{xxii} Id. at Section 4(d)
^{xxiii} Id. at Section 4(e)
^{xxiv} Id. at Section 4(m).
^{xxv} Id. at Section 4(e).
^{xxvi} Id. at Section 4(n.)
^{xxvii} Saroj Kumar Dash, *Knowing Panchatati Raj Administration in Odisha*, Government of Odisha
^{xxviii} Snehasis Sahoo, *Tribal Development through Panchayati Raj System in Odisha*, SRJIS, 15842, 15843 (2021).
^{xxix} Id
^{xxx} Dr. K. Somasekhar, *Women Empowerment through Panchayat Raj Institutions: An Overview*, (Mar. 12, 2023, 3.30 PM), <https://doi.org/10.36713/epra1013>
^{xxxi} Saroj Kumar, *supra* note 27 at.)
^{xxxii} Dr. Rajesh Kumar Sinha, *Women in Panchayat*, *Kurukshetra*, 34, 36-37 (2018).
^{xxxiii} Jan. 23, 2023, 4.20 PM), www.rural.nic.in.
- 