



PERSECUTION OF MUSLIM WOMEN IN MODI'S INDIA:

Hindutva's violence against India's Muslim women.

From Gujarat 2002 to 2025

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Contents:

Page 3: GLOSSARY

Page 4: INTRODUCTION

Page 5: SEXUAL VIOLENCE AND GENOCIDE:

LEGAL UNDERSTANDING

Page 6: GENDER AND HINDUTVA IDEOLOGY

Page 7: INTERNATIONAL COMPARISON

Page 8: GUJARAT 2002

Page 12: MUZAFFARNAGAR 2013

Page 15: MODI'S PREMIERSHIP:

Page 16: DELHI 2020

Page 19: HATE SPEECH AND LOVE JIHAD

Page 22: SOCIAL MEDIA HARASSMENT

Page 25: CONCLUSIONS AND RECOMMENDATIONS

Page 27: REFERENCES

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GLOSSARY

Terms in order of appearance:

- **Hindutva** : A far-right ethno-nationalist ideology that believes in a cultural Hindu identity and the establishment of India as a Hindu nation.
- **Rashtriya Swayamsevak Sang (RSS)**: A Hindutva organisation established in 1925 providing paramilitary training to raise the next generation of Hindu men with ‘discipline’ and physical strength. Has previously been banned by the Indian government for allegedly encouraging communal violence. Prime Minister Narendra Modi is a member of the organisation.
- **The Mughal Empire**: An Islamic dynasty that ruled an area spanning from now-Afghanistan to Bangladesh, between 1562 and 1856. Its leaders have been accused of destroying Hindu temples, raping Hindu women, and forcing conversions to Islam.
- **The Sangh Parivar**: A collective term for organisations linked to the RSS, including Modi’s Bharatiya Janata Party (BJP).
- **First Information Report (FIR)**: A formal document written and filed by the police to initiate the criminal justice process when a crime has allegedly been committed.

INTRODUCTION

Muslim women in India today face significant genocidal threat from the rise of Hindu Nationalism.

Under Prime Minister Narendra Modi's leadership, patriarchy and religious discrimination intersect to drive sexual violence against India's minority ethnic women.

Whilst the use of women's bodies as battle grounds is neither new nor unique to India, it is a fundamental characteristic of India's communal violence.

This is a sad reality explored by Megha Kumar's book, *Communalism and Sexual Violence in India: The Politics of Gender, Ethnicity and Conflict* (2017). Addressing three major pogroms that took place in Gujarat in 1969, 1985, and 2002, Kumar's work brought to light the critical facilitators of sexual violence in India's communal conflicts.

Taking up from where Kumar left off, this report draws comparison between Gujarat 2002, the 2013 Muzaffarnagar riots, and the current culture of Modi's India. Three key conditions for religiously motivated sexual attacks against Muslim women are presented in their 21st century contexts:

- **Hindutva ideology**
- **Political coordination**
- **Impunity**

Manifesting in rising levels of hate speech, social media abuse, and conspiracies like ‘Love Jihad’, together these factors create fertile ground for future sexual violence against Muslim women.

Genocide Watch deems Hindu nationalism's treatment of Muslim women to constitute classification (stage 1), discrimination (stage 3), dehumanisation (stage 4), polarisation (stage 6), persecution (stage 8), and denial (stage 10).

SEXUAL VIOLENCE AND GENOCIDE: LEGAL UNDERSTANDING

“Sexual violence devastates the minds and spirits of its victims through the decimation of the most precious fact of existence, their sexuality. When sexual violence is intentionally destined to destroy a people, it moves from a crime against humanity to genocide.” - Sitkin

As this report intends to demonstrate, Hindu nationalist ideologies and their proponents encourage sexual violence with the purpose of morally and physically devastating India's Muslim community.

Hindutva gender-based violence therefore contravenes clauses B, C and D of Article II of the Genocide Convention (1948):

Genocide constitutes any of the following acts committed with intent to destroy, in whole or in part, a national, ethnical, racial or religious group, as such:

- (A) Killing members of the group
- (B) Causing **serious bodily or mental harm** to members of the group
- (C) Deliberately inflicting on the group conditions of life calculated to bring about its **physical destruction** in whole or in part;
- (D) Imposing measures intended to **prevent birth** within the group
- (E) Forcibly transferring children of the group to another group

SEXUAL VIOLENCE AND GENOCIDE: GENDER AND HINDUTVA IDEOLOGY

During an interview with Genocide Watch, communal politics specialist and author, Ram Puniyani stressed the importance of misogyny to Hindu nationalism.

Since the movement's conception in the 1920s, gendered constructions of the **Muslim 'other'** have provided the backbone of Hindutva's religious eliminationist ideology.

Kumar explains that to refute colonial representations of Indian men as submissive and weak, the founder of Hindu nationalism, Vinayak Damodar Savarkar, looked to restore Indian identity through a new depiction of Hindu masculinity.

Refined and honourable, Savarkar's ideal of 'the Hindu Man' was reinforced by its juxtaposition against Muslim masculinity – portrayed as **hypersexual, violent, and invasive of Hindu purity**.

As a beacon of the religion's virtue, the chaste Hindu woman was equally distinguished from Muslim femininity, demonised as sexually perverse and integral to the immorality of its masculine counterpart.

Savarkar and his prodigy, Madhav Sadashiv Golwalkar (leader of the RSS 1940-1973), theorised that Hindu's must revenge Muslim men's alleged aggressions by **damaging their honour** in the same way the Mughal Empire purportedly did so to Hindus: by raping their women.

Hindutva 'justification' for sexual violence against Muslim women was therefore threefold:

- A need for **vengeance**

- A need to curtail the reproduction of an 'invasive' Muslim population through the **destruction of Muslim women's organs**
- A need to impregnate Muslim women to **strengthen the Hindu population** in India, informed by Hindu nationalism's upholding of patriarchal lineage

The genocidal intention was clear: through the sexual violation of Muslim women, Hindus could restore their honour; dismantle the moral core of the Muslim community; and ensure the physical erasure of the Muslim presence in India by disrupting their reproductive continuity.

Here rape becomes a political instrument to take revenge against the enemy.” - Ram Puniyani

SEXUAL VIOLENCE AND GENOCIDE: INTERNATIONAL COMPARISON

Sexual violence has been used as a weapon of conflict across the world since time immemorial. The UN's special representative for [End Rape in War, Pramila Patten, stated in 2023](#) that **sexual violence and rape have been a feature of every single recorded war.**

Rape's strategic importance in the elimination of a 'people' has been recognised in the recent genocides of the Tutsis in Rwanda, Bosnian Muslims in Former Yugoslavia, and the Yazidis in Iraq and Syria. In all three atrocities, gendered ideologies similar to that of Hindu nationalism incited the mass rape and sexual assault of minority women.

- **RWANDA: Wide-spread rape and gang rape of up to 500,000 Tutsi women.** An investigation by Human Rights Watch in 1996 concluded: *“The targeted use of sexual violence against Tutsi women was fuelled by both ethnic and gender stereotypes; Tutsi women were targeted on the basis of the genocide propaganda which had portrayed them as calculated seductress-spies bent on dominating and undermining the Hutu.”*
- **FORMER YUGOSLAVIA: 'Rape Camps' of up to 50,000 Bosnian women.** Studies assert mass rape was a planned strategy to, *“create the rejection of raped mothers and their children and thus destabilize their social and ethnic group... to prepare victims to hate and eventually to destroy their own children or be destroyed by them, and to create a situation where the paternal lineage of the child... would perpetuate and increase the ethnic group of the aggressor”*
- **YAZIDI WOMEN: Thousands of women captured for sexual slavery by ISIS.** ISIS believed that, as a closed religion, Yazidi communities would be broken down by 'outsiders' raping their women. Much like the Serbians, they sought to forcefully impregnate Yazidi women to stop the reproduction of Yazidi people, believing in the superiority of paternal lineage.

The following section of this report looks at how sexual violence has played a similar role in Hindutva campaigns against India's Muslim population.

GUJARAT 2002

The 2002 genocidal massacres in India's Gujarat state witnessed over 1000 people murdered across three days, in what would become one of India's most deadly religious 'riots'. The vast majority of the victims were Muslim, targeted by Hindutva mobs who burnt and looted their properties whilst police stood back to watch the violence unfold.

Among the worst atrocities committed during the pogrom were the **coordinated mass rapes of Muslim women**. Whilst there remains a distinct lack of data on the number of rape victims from the massacre, Shabnam Hashmi, an activist and former social worker who worked extensively with the Gujarat survivors, estimates that **at least 400-500 gang rapes took place**. Only three went to court.

Of the 38 women Hashmi interviewed after the attacks, each recounted the same story of being **stripped naked, made to run or dance, and then gang raped by 8 – 10 men**, sometimes with iron or wooden rods. Every woman Hashmi spoke to knew of up to ten others who were sexually assaulted during the riots. Many were burnt alive following the rapes.

IDEOLOGY

Megha Kumar's analysis of Gujarat 2002 presents ideology as a key facilitator of the widespread rape.

In the lead up to the violence, propaganda circulating in the form of newspapers, speeches, and pamphlets **urged Hindus to 'respond to bricks with stones' against the alleged sexual threat of Muslim men**.

The 'Jehad' publication was among the most vicious pamphlets to incite the genocidal rape of Muslim women in India:

The people of Baroda and Ahmedabad have gone berserk
Narendra Modi you have fucked the mother of miyas [Muslim men]
The volcano which was inactive for years has erupted...
We have widened the tight vaginas of the "bibis" [Muslim women]...
She was fucked standing while she kept shouting
She enjoyed the uncircumcised penis.
With a Hindu government the Hindus have the power to annihilate miyas.

Excerpt from 'Jehad'
pamphlet (2002)



Vishwa Hindu Parishad, 'Savadhan Campaign' (Ahmedabad, 1998)
'Hindu women, beware!'

(22) When you do — (?) in Muslim houses have irregular relations with Muslim women so that you have the opportunity to increase Hindu population
(23) Deform new-born babies of Muslims

This was the nation of heroes, now it is filled with frightened people
They escape from our control and the poor innocent is sacrificed
If the Hindu youth is angered there will be a rain of shoes on their heads
Hindu wake up now and chase away the Muslims

Excerpt from 'INSTRUCTIONS FROM LOCAL LEADERS TO RSS MEMBERS' pamphlet (2002)

POLITICAL ORGANISATION

The Gujarat 2002 massacres are infamous for their **coordination by the state's leadership** at the time: then-Chief Minister Narendra Modi and the Bharatiya Janata Party (BJP), who now serve respectively as the Prime Minister of India and the country's ruling party.

Key figures of the BJP, Vishva Hindu Parishad (VHP) and Banjrang Dal parties were accused of participating in the anti-Muslim violence, supplying voting and tax lists to the state's newspaper outlets to help Hindutva mobs locate and target Muslim households.

The Indian police, who Hashmi asserts have 'political patronage', were ordered by BJP leaders to permit the attacks on Muslim households. For this reason, Hashmi and most commentators on the violence deem Gujarat 2002 to have been a 'state-sanctioned' massacre rather than a 'communal riot'.

ORGANISED SEXUAL VIOLENCE

On the 28th of February 2002, a Hindu nationalist mob of [25,000 men](#) led by BJP politician and close aid to Modi, Maya Kodnani, sexually attacked Muslim women in Naroda Patiya, Gujarat.

Bearing swords, chemicals and homemade bombs, the men shouted, '[Burn the Muslims alive](#)' and cornered Muslims attempting to flee the violence. The mob proceeded to assault and rape the trapped women over many hours.

[97](#) Muslims were killed, the majority of whom were women and children.

[In 2018](#), the Indian courts overturned Maya Kodnani's conviction for her facilitation of the massacre. She served just four years of a 28 year sentence.

Genocide Watch deems the events of the Gujarat 2002 Massacre to constitute classification (stage 1), discrimination (stage 3), dehumanisation (stage 4), organisation (stage 5), and persecution (stage 6).

IMPUNITY

"Give me back my right to live without fear and in peace." - [Bilkis Banos](#), Gujarat 2002 Gang Rape Survivor

In 2022, the BJP Home Ministry, under Amit Shah's direction, released Banos' attackers.

The freed rapists received a 'hero's welcome' from BJP politicians and were celebrated by the Gujarat leader, C.K Rauli, as 'Brahmins' with '[good sankaar](#)' (religious values).

While the decision to grant the men early release was eventually overturned by the Indian Supreme Court, the BJP's message was made clear: under their leadership, **rape of Muslim women would go unpunished.**

The case of Bilkis Banos demonstrates not only Hindu nationalist denial of the Gujarat genocide, but also the sense of triumph that accompanied it. The murder and rape of Muslim women during the massacre was glorified as much as it was overlooked, with perpetrators honoured by Hindutva leaders as saviours of 'the Hindu nation'.

MUZAFFARNAGAR RIOTS 2013

In the summer of 2013, India witnessed another deadly Hindu-Muslim conflict that claimed at least [65 lives](#) – the vast majority Muslim.

[51,000 residents](#) of the Muzaffarnagar district in Uttar Pradesh were displaced because of the violence. **[Once Muslim-majority villages were purged of all Muslims.](#)**

An estimated [100 women were raped](#) over the course of the conflict. Most were gang raped by 3 or more men.

[One Muslim woman](#), who has remained anonymous, was gang raped by a Hindu nationalist mob whilst her child was held at gunpoint. She recalls the attackers chanting, **"slaughter these Mullah's*... rape their women."**

IDEOLOGY

Hindu nationalist rhetoric around the 'threat of Muslim men' was a key driving force of the Muzaffarnagar pogrom.

Accounts describe **escalating religious tensions in the region over 'community honour'**, with women's '[dignity and bodily integrity](#)' constituting key themes of Hindutva propaganda circulating in the lead up to the violence.

Then, in late August 2013, [reports document that a Muslim man was murdered in Muzaffarnagar for having allegedly harassed a Hindu woman](#). His two attackers were targeted in a revenge killing.

Complaining of the police's handling of the murders, [Hukum Singh, Uttar Pradesh Assembly's BJP leader, delivered a speech](#) to thousands of Hindu farmers just hours before the conflict erupted, inciting anti-Muslim fervour.

Singh had previously used the slogan '[Bahou-beti bachou](#)' (**save our daughter-in-laws**) and labelled Muslim men as rapists.

He told journalists that day, "*There has been discrimination against Hindus for the last year and a half... No action is being taken on complaints.. [girls are being harassed.](#)*"

The call for Hindu vigilante 'revenge' was made.

POLITICAL ORGANISATION

***"Orchestrating communal violence is not easy. It requires planning and forethought, the protracted targeting of a community and a commensurate mobilisation of divisive sentiments among the communities that make up the majority."* - [Shiva Mogha](#)**

The BJP has been accused of coordinating the Muzaffarnagar violence for electoral gain.

A report by the Indian political journal, [the Caravan](#), details how the BJP once held little ground in the Muzaffarnagar region. **The party thus sought to garner support from young, poor, Hindu Jats by portraying Muslims as a threat to their agrarian caste.**

Touring the region, the BJP spread rumours about the **corruption of Hindu chastity by Muslim masculinity**. [Sanjeev Baylan repeatedly spoke at BJP events](#) to express concern about the honour of Hindu 'daughter-in-laws' and their sexual assault by Muslim men.

Former Muzaffarnagar resident, [Shiva Mogha](#), recalls how, "*Cases of sexual harassment became omnipresent in the newspapers we got... Many in my locality genuinely believed there was a **nefarious conspiracy by Muslims to marry and convert Hindu women.***"

One BJP leader, [Sanjeet Som, circulated a false video of Hindu men being attacked by Muslims](#) as the communal tensions began to rise, **fanning the flames of the pogrom that would follow.**

Election Successes

In the subsequent Lok Sabha general election (2014), the BJP enjoyed a sweeping victory across Uttar Pradesh, boasting [43.3% of the vote](#) thanks to the [Hindu Jat support](#) gained from the riots.

Local court cases brought against BJP politicians for incitement of communal violence were [dropped by 2019, following a government plea](#).

IMPUNITY

Despite estimates of up to 100 Muslim women being sexually assaulted during the Muzaffarnagar riots, **only [seven women](#) reported the gang rapes to the police.**

Human Rights Watch attributed this significant underreporting to a **"fear of reprisals, stigma, and a lack of faith in state institutions."**

Of the 25 men accused of gang rape and sexual assault during the Muzaffarnagar conflict, [22 evaded justice](#).

Victims [faced death threats](#), **extensive legal delays**, and **inaction by the state police**, resulting in only one woman successfully bringing her attackers to court.

After an immense struggle for justice, the anonymous survivor's rapists were sentenced to 20 years in prison in 2023 - a whole decade since the First Information Report (FIR) was filed:

- It took four months and the Indian Supreme Court's intervention for the survivor's complaint to be officially lodged.
- It wasn't until November 2021 that the police interviewed all seven prosecution witnesses.
- Significant harassment by the accused's families forced the survivor to transfer her case outside of Muzaffarnagar, causing further delays.

With little trust in India's criminal justice system, both Shabnam Hashmi and Ram Puniyani told Genocide Watch that **sexual assault victims are generally met with disregard and disbelief from the Indian police**.

However, due to political bias and religious discrimination, **Muslim women reporting gender-based violence are treated with particular contempt**.

For Hashmi, the pogroms of Muzaffarnagar 2013 and Gujarat 2002 demonstrate that, when it comes to the rape of Muslim women, attackers face **"total impunity."**

For attempts to conceal evidence, undermine witness testimonies and significantly delay the course of justice, Genocide Watch deems the UP police and BJP to have committed stage 10 of genocide: denial.

MODI'S PREMIERSHIP

The following section analyses how ideology, political organisation, and impunity facilitate the sexually violent targeting of Muslim women under BJP leadership today.

It will address :

- **The 2020 Delhi pogroms**
- **Hate speech and the 'Love Jihad' conspiracy**
- **Online sexual harassment of muslim women**

DELHI 2020

In December 2019, Narendra Modi's government introduced the [Citizen Amendment Act](#) (CAA), allowing only non-Muslim undocumented immigrants to become legal citizens of India.

Muslims who took to the streets of Delhi to protest the discriminatory law were met with vicious repression by state police and the Indian media.

After months of inflammatory BJP speeches – in which the anti-CAA movement was frequently called 'jihadist' - BJP politician Kapil Mishra ordered the [clearing of protesters on the 23rd of February 2020](#).

Sparking widespread communal clashes, Hindu extremists attacked the Muslim protesters with stones, making ["provocative speeches" and "claiming themselves as victims and Muslims as aggressors."](#)

Mosques were set on fire and Muslim homes and shops were vandalised.

Over [50 people](#), mostly Muslims, were killed as the riots escalated.

Sexual violence was a feature of the riots, but it remains under-acknowledged.

[Several women](#) told journalists they were threatened with rape during the pogrom and knew of neighbours who were sexually assaulted.

However, very few came forward about their own victimisation as they [“did not want to tarnish their own name.”](#)

IDEOLOGY

One of the Muslim women threatened with rape during the pogrom alleges being chased by [a Hindu nationalist mob](#). The men were shouting, **“we will catch you and make you give birth to Shri Ram’s progeny”**, harking back to Hindutva ideological aspirations around strengthening India’s Hindu population through raping Muslim women.

A single mother of three recounted the abuse she faced, with the crowd having reportedly cornered the victim and threatened, [“give us your daughters and we will spare you.”](#)

The woman managed to escape, but reiterates that, **“There are many others who have been molested but they are not admitting it out of shame.”**

Accounts report that [pregnant women](#) were also targeted by the mobs. Women seeking aid from Delhi’s Al Hind hospital recalled their stomachs being kicked by Hindu Nationalists, endangering the lives of Muslim women and attempting to erase the very potential of a future Muslim generation.

Such testimonies of targeted attacks against Muslim women’s bodies suggest that the same genocidal ideological fervour driving mass sexual violence in Gujarat 2002 and Muzaffarnagar 2013 permeated the Delhi pogroms.

POLITICAL ORGANISATION

Indian political journal, the Caravan, reports BJP leaders to have allegedly participated in, and even have [‘orchestrated’](#), the Delhi pogroms.

The politicians implicated include member of parliament Satya Pal Singh, member of legislative assembly Nand Kishore Gujjar, and **party leader Kapil Mishra who was seen leading a violent group whilst chanting ‘[Mullas belong in Pakistan.](#)’**

Kapil Mishra was also accused of ordering the police and ambulance services to refrain from helping victims of the [violence for three days](#).

Muslim survivor testimonies recount the Delhi police not picking up the phones during this period, whilst the attacks escalated.

The Delhi police are reported to have [joined in the violence](#), [stoning Muslims](#), burning Islamic shrines, and even beating up the women and children who were protesting.

The Delhi police dropped all of the allegations made against the [BJP for its involvement in the 2020 pogroms](#), as well as those made against officers who were witnessed contributing to the attacks.

Muslims who reported state participation in the violence were **threatened and intimidated by the police**, allegedly told that the [reports would only be filed if the officers’ names were removed](#).

The BBC uncovered that **among the 62 murder cases from the pogroms, only 1 has resulted in a conviction**. Conversely, at least 12 Muslim protesters remain in prison as ‘conspirators’ of communal violence. [Hundreds more anti CAA activists remain in jail](#) after arbitrary arrests.

[Human Rights Watch](#) reported in 2022 that the Indian police and political leadership arrested Muslims en masse after the pogroms, whilst Hindu nationalists who incited the violence remain free.

In what Shabnam Hashmi calls a **“culture of diluting women’s rights to reporting in general” by Modi’s government**, no instances of rape or sexual assault in the pogrom were officially reported.

Genocide Watch deems the events of the Delhi 2020 massacre to constitute classification (stage 1), discrimination (stage 3), dehumanisation (stage 4), organisation (stage 5), persecution (stage 6), and denial (stage 10).

HATE SPEECH AND THE LOVE JIHAD CONSPIRACY

“While not every use of genocidal hate speech leads to genocide, all genocides have been preceded by genocidal hate speech.” - [Anne Applebaum, Historian](#)

Genocidal sentiment against Muslims in India is stirred by an alarming rise in hate speech under Modi’s leadership, as reported by the [Centre for the Study of Organised Hate](#) (CSOH).

The CSOH’s most recent report showed that hate speech in India increased considerably between 2023 and 2024, with **98.5% of all hate speech events targeted towards Muslims**.

Playing a key role in the dissemination of hate speech in India, **the BJP were responsible for 39.7% of all recorded cases**.

The Love Jihad Conspiracy

[A significant proportion](#) of the BJP’s hate speech centred around, and legitimated, the ‘Love Jihad’ conspiracy.

An ideology of Hindu nationalism first propagated in the early 2010s, **‘Love Jihad’ refers to the alleged organised efforts of Muslim men to seduce and convert Hindu women**. The Caravan exposed the Love Jihad conspiracy for what it really is in 2014: **[“the Sangh Parivar’s sexual politics in another name.”](#)**

In other words, just like early Hindutva ideology, it incites revenge violence on Muslim men, and in turn Muslim women, for their alleged threat to Hindu purity.

Esteemed New-Delhi journalist, Ismat Ara, told Genocide Watch that Love Jihad is, *“simply the latest label for this historical anxiety...”* yet, *“What sets the present moment apart is the scale of institutional backing. Through laws, state-sanctioned rhetoric, and a complicit media, private relationships have been reimagined as matters of national security.”*

Under the guise of a new ‘anti-conversion’ law professing to tackle, **[“deception, fraud and misrepresentation”](#)**, the BJP are successfully criminalising inter-faith marriages they deem to constitute acts of Love Jihad.

Laws introduced and utilised by the BJP to criminalise those accused of ‘Love Jihad’ constitute dehumanisation (stage 6) and polarisation (stage 6).

HINDUTVA HATE SPEECH AND SEXUAL POLITICS: EXAMPLES

- [In 2024](#), **Prime Minister Narendra Modi** referred to Muslims as ‘intruders’, claiming, *“they are stealing your food, daughters, and your land...”*

- Uttar Pradesh's BJP leader, **Lakshmikant Bajpai**, wrongly declared that Muslims committed 99% of [rapes in the state.](#)
- BJP Minister of Home Affairs, **Amit Shah**, has referred to Muslims as, ["those who violate our women"](#) and 'infiltrators' who are causing the Hindu Adivasi population to be ["on the verge of extinction."](#)
- About Rohingya Muslim refugees in India, the Secretary for Agriculture, **Shivraj Singh Chouhan**, told India's Hindu population, ["Your women are in danger because of these infiltrators."](#)
- BJP politician and member of the legislative assembly, **Raja Singh**, vowed that, ["If \[Muslims\] take one Hindu girl, we'll take ten of theirs."](#)
- He instructed Hindus [last year to](#), *"Learn to use weapons so you can shoot in the chest of people who do love jihad. Don't be afraid of going to jail for killing a 'love jihadi.'"*
- **Yogi Adityaneth**, Chief Minister of Uttar Pradesh and the political figure responsible for the most cases of hate speech in 2024, had previously spent time in jail for threatening that, ["If one Hindu girl marries a Muslim man, then we will take 100 Muslim girls in return ... If they \[Muslims\] kill one Hindu man, then we will kill 100 Muslim men."](#)
- Hindu Monk, Uttar Pradesh Temple Leader and Hindu Extremist, **Bajrang Muni Das** announced to an applauding crowd, ["I am telling you this \[Muslims\]... if a single girl is teased by you in Khairabad, I will openly bring your daughter and daughter-in-law out of your home and rape her."](#)
- Former BJP leader in Uttar Pradesh, **Mahila Morcha**, [wrote on Facebook in 2021](#): *"There is only one solution for them (Muslims). Hindu brothers should make a group of 10 and gang rape their (Muslims) mothers and sisters openly on the streets and then hang them in the middle of the bazaar for others to see..."*

Shabnam Hashmi warned Genocide Watch that it is now common for Hindutva leaders to claim that *"by a certain year Hindu men will be married to a certain number of Muslim women"*.

Hashmi noted the irony of Love Jihad accusing Muslims of seducing Hindu women in an organised way, when **rhetoric to eliminate the Muslim population by marrying, impregnating, and raping its women poses a realistic genocidal threat in India.**

With this ideology having trickled down to the electorate, [The National Convention of Women](#) reported a video in 2022 of a woman calling for Hindu men to *"rape and impregnate Muslim women if Muslim men cast even a glance at Hindu girls"* at the Dharma Sansad, Raipur.

IMPUNITY

The Centre for the Study of Organised Hate reported that deliverers of hate speech faced little repercussion in 2024, emphasising **judicial inaction and the normalisation of hate**:

["By routinely declining to take direct action or issue clear guidelines to the ECI* regarding its inaction, the judiciary failed to uphold its constitutional duty to protect citizens and address the growing issue of hate speech."](#)

Hateful propaganda against Muslim women and the wider Muslim population constitutes stage 4 of genocide: Dehumanisation.

SOCIAL MEDIA AND SEXUAL HARASSMENT

In Modi's India, social media is crucial to the targeting and sexual harassment of Muslim women by Hindu nationalists.

A report by Professor Mohan.J Dutta published in 2022 found that Muslim women in India are face alarming levels of "[cyberstalking, bullying, harassing, trolling, doxing, death and rape threats](#)" in the wake of Delhi 2020 and the Love Jihad conspiracy.

In the same year, Butler's investigation into 'Islamophobia in the digital age' found that [many of the 3.7 million Islamophobic tweets made between 2019 and 2021 attacked prominent Muslim women](#), of which Indian Muslim journalists, Rana Ayyub and Arfa Khanum Sherwani were the second and fourth most abused online.

Cyber harassment of Muslim women in India is usually of a sexual nature, with Rana Ayyub documenting [over 26,000 death and rape threats](#) she received on X (formerly Twitter), predominantly from Hindu nationalist accounts.

This abuse plays into well-established Hindutva ideologies of Muslim women being sexually perverse. For example, [Ladeeda Farzana is just one of many female anti CAA protesters whose face has been pasted onto pornographic photos](#) by Hindu nationalist internet users.

A Reddit community called 'Muslimah for Hindu Men' was recently exposed as a platform over which [15,000 people described degrading and violent sexual fantasies about Muslim women](#).

As technology evolves, so do Hindu nationalist methods of demeaning Muslim women. Prominent activist organisation, [Feminism in India, discovered AI to be increasingly harnessed by Hindutva groups](#) to create and share 'ultra realistic' pornographic images of Muslim women online.

THE AUCTION OF MUSLIM WOMEN ONLINE

The most widespread instances of online harassment against Muslim women in India took place via the creation of the ['Bulli Bai' and 'Sulli Deals' apps in 2021](#).

Invented by young Hindu extremists and named after Islamophobic slurs, these apps used Muslim women's photos and information to auction them online. Over 180 women, mostly activists, journalists, and artists critical of Modi's politics, were sold in the fake auction as **"deals of the day."**

The apps served to silence outspoken Muslim women in India, with one victim asking, ["What if someone just comes and claims their deal of the day? I don't see anything stopping them from doing that."](#)

[Research by Bebaak Collective](#) shows Hindutva efforts to suppress Muslim voices are working, as many Muslim women are coming off social media to avoid the misogynistic abuse.

IMPUNITY

While the Sulli Deals and Bulli Bai creators, [Aumkareshwar Thakur and Niraj Bishnoi](#) respectively, were arrested in 2022, the men were swiftly released on bail and are yet to face justice. .

[Citizens for Justice and Peace](#) note that Hindutva social media users, who mostly remain anonymous, "know that **there is hardly any precedent for anyone in India from being prosecuted for misogynistic or hate speech.**"

Sexual harassment is only taken down from digital platforms if it is reported, and perpetrators create new profiles if they are successfully banned.

For Ismat Ara, accountability for online hate remains *"alarmingly inadequate."* Ara deems the creators of the Sulli Deals and Bulli Bai apps to be, *"products of a larger ecosystem that normalises anti-Muslim hatred and*

rewards misogyny with virality.” Adding, “India needs serious political will to treat digital hate crimes against Muslim women as urgent and systemic issues, rather than one-off aberrations.”

REPERCUSSIONS

[Activists](#) across India express serious concern about the proliferation of hate speech and sexual harassment towards Muslim women under Modi’s leadership. They recognise similarities between such trends and the propaganda that facilitated mass rape in Gujarat 2002 and Muzaffarnagar 2013.

Having reported extensively on the Bulli Bai and Sulli Deals apps, Ismat Ara warned Genocide Watch that, *“The violence of these acts lies in their intent to strip Muslim women of dignity and autonomy. And when this kind of dehumanisation becomes routine online, it emboldens real-world violence. The internet is not a vacuum. It reflects and reinforces social attitudes. The threats become more specific, the stalking more aggressive, and the boundary between digital and physical harm starts to blur.”*

The BJP’s normalisation, and indeed glorification, of anti-Muslim misogynistic rhetoric and online abuse serves to strengthen genocidal Hindutva ideology, putting Muslim women across India at risk of sexual violence.

REAL STORIES

The following examples demonstrate the recurrence of attacks against Muslim women by Hindu nationalists across Modi’s India:

[January 2025](#): Kushnigar, Uttar Pradesh, three Muslim women were stripped naked, beaten and paraded round the village because one of their sons was accused of eloping with a non-Muslim woman. The women were filmed and put online.

[October 2023](#): Mumbai, a 12-year-old Muslim girl assaulted, sexually harassed, and touched inappropriately by Hindu Nationalist men and women.

[July 2023: In Madhya Pradesh, a Muslim woman named Zarrin Khan, was attacked by a mob of Hindu extremists. She was sexually assaulted and hit with swords, bats, rods whilst called anti-Muslim slurs.](#)

[December 2022](#): The IAMC reported a leaked WhatsApp chat of a student faction of RSS planning a genocide of Muslims through “buying or kidnapping” Muslim women and mass sterilising them.

[January 2018](#): In Kathua, an 8 year old Muslim girl was kidnapped, drugged, gang-raped and killed to “drive out the Gujjar-Bakerwals”, who are of Muslim faith. The rapists were aided by a police officer, who along with other members of the police attempted to cover up the murder. The Kathua Bar Association tried to stop the filing of an FIR against the rapists.

CONCLUSION AND RECOMMENDATIONS

- Over the past 20+ years, Narendra Modi and the BJP have brought hateful, gendered Hindutva ideology into the mainstream, putting Muslim women across India at risk of ‘retaliatory’ sexual violence for the perceived threat of Muslim masculinity.
- Hindu Nationalist hate speech undermining women’s bodily autonomy and demonising the sexuality of the Muslim community has become proliferate in India. This trend is exacerbated by the rise of social media.

- Political leaders, internet users, and communalist rioters who encourage or participate in the sexual assault of Muslim women face impunity under Modi's leadership, serving to normalise conditions for genocidal sexual violence present during the Gujarat 2002 and Muzaffarnagar 2013 conflicts.
- Rape during these pogroms was not opportunistic – it was charged with genocidal intention to destroy the Muslim population and reproduce an exclusively-Hindu nation.
- Euphemised through terms such as 'Love Jihad', a similar gendered eliminationist ideology permeates Hindutva culture today. Such ideologies create fertile ground for future organised sexual violence against India's Muslim women.

RECOMMENDATIONS FOR PREVENTION:

- Gender neutral, the Genocide Convention (1948) currently fails to prevent and punish acts of genocidal sexual violence. The Genocide Convention must therefore be revised to incorporate Gender Based Violence, in line with the Rome Statute (1998) and UN Security Council Resolution 1820 (2008).
- India is a state party to the 1948 Genocide Convention. The central government has a duty to enforce its anti-hate speech laws and prosecute leaders' calls for violence and rape against Muslim women.
- The central government must publicly condemn attacks against Muslims by Hindus, acknowledging the entrenchment of gendered ideologies in religious hatred driving such attacks.
- Meta (Instagram and Facebook) and X (formerly Twitter) must reinstate independent fact checkers and strengthen their policies around hate speech dissemination to account for cultural and linguistic variety in hate speech messages.
- Using its special powers under Article 142, the Indian Supreme Court should establish clear, binding guidelines on social media content moderation and platform liability, including penalties for non-compliance.
- India's police force must undergo reform by adopting Diversity, Equity, and Inclusion (DEI) hiring systems. Latest figures show that only [6.91%](#) of the total police force is Muslim and [over half of India's police officers](#) are bias against Muslims.
- US congress should address India's denial of religious freedom during U.S.-India bilateral meetings and convey growing concern about the demonisation of Muslim culture, the targeted attacks on Muslim communities, and Hindutva's use of sexual violence against Muslim women.
- US opposition to Hindutva hate speech and discrimination against Muslims must be expressed in public hearings, briefings, letters, and congressional delegations, specifically drawing attention to its gendered nature. United States Senator Cory Booker spoke [out](#) against the display of bulldozers at the India Day Parade in New Jersey in August 2022. American political leaders must continue to issue statements and condemn instances where hate is displayed against Muslims by the Indian community in the U.S.

RECOMMENDATIONS FOR JUSTICE:

- The UN should launch an official fact-finding mission into Hindutva discrimination and sexual assault against Muslim and ethnic minority women in India today.
- The Indian Supreme court must appoint an independent commission to thoroughly investigate the events of the Delhi 2020 pogrom, specifically through the lens of gender based violence.
- The Delhi High Court must reverse its decision to stay court proceedings against Kapil Mishra for his role in the Delhi 2020 violence.
- The central government should instate official relief and reparation plans for future instances of communal violence. These plans should be shaped through a gendered lens, ensuring victims of sexual violence are provided proper rehabilitation and a secure environment to seek justice.
- In the immediate aftermath of a communal violence outbreak, the Indian authorities should adhere to the World Health Organization guidelines for medico-legal care for victims of sexual violence. These

emphasize that the health and well-being of a sexual violence survivor must take precedence over forensic services.

- The US should impose sanctions on India for the Modi government's undermining of religious freedoms and minority rights.