

INTERNATIONAL JOURNAL OF LAW MANAGEMENT & HUMANITIES

[ISSN 2581-5369]

Volume 7 | Issue 2

2024

© 2024 *International Journal of Law Management & Humanities*

Follow this and additional works at: <https://www.ijlmh.com/>

Under the aegis of VidhiAagaz – Inking Your Brain (<https://www.vidhiaagaz.com/>)

This article is brought to you for “free” and “open access” by the International Journal of Law Management & Humanities at VidhiAagaz. It has been accepted for inclusion in the International Journal of Law Management & Humanities after due review.

In case of **any suggestions or complaints**, kindly contact Gyan@vidhiaagaz.com.

To submit your Manuscript for Publication in the **International Journal of Law Management & Humanities**, kindly email your Manuscript to submission@ijlmh.com.

Exploring Legal Rights and Socio-cultural Dynamics: A Comparative Analysis of Women's Rights in Marriage versus Live-in Relationships

NAVREET KAUR¹ AND MEHAKPREET KAUR²

ABSTRACT

Marriage in India is revered as a sacramental bond, bringing together not just two individuals but also two families. However, this longstanding tradition is gradually being supplanted by the Western phenomenon of Live-in Relationships. Unlike marriage, a live-in relationship is an arrangement characterized by cohabitation and intimacy without legal recognition under Indian laws. Consequently, women in such unions do not enjoy the same rights and protections afforded to married women. Nonetheless, recognizing evolving societal norms, certain rights akin to those of married women are being extended to women in live-in relationships. This article undertakes a comparative analysis of the rights available to women in both marital and live-in arrangements, shedding light on the changing landscape of intimate partnerships in contemporary India.

Keywords: *Live-in Relationship, Marriage, Rights of a Married Woman, Judiciary in India.*

I. INTRODUCTION

The institution of marriage admits a man and a woman to family life. It is a formal process of entering into a stable relationship that permits men and women to live together in society. It entrusts the couple with the responsibilities of married life. Marriage is not merely concerned with the couple; rather, it affects future generations and society as a whole. In Hindu culture, marriage is seen as a means for spiritual growth.³

This traditional institution of marriage is however losing its significance in the present era. This shift is driven by the influence of global culture and media, which have prompted young Indian couples to question the necessity of marriage—an institution not inherently biological but rather socially constructed and enforced. With some aspects of marriage deemed unnecessary and

¹ Author is an Assistant Professor at Department of Laws, GNDU, Amritsar, India.

² Author is a student at Department of Laws, GNDU, Amritsar, India.

³ Gunjan Jain, "Significance of Marriage as Social Institution in Indian English Writings", 2017, https://www.researchgate.net/publication/323525314_Significance_of_Marriage_as_Social_Institution_in_Indian_English_Writings

undesirable, many Indians are exploring alternative arrangements. It is within this evolving societal context that the concept of live-in relationships has emerged, permeating the Indian consciousness. Unlike traditional marriage, a live-in relationship offers couples the freedom to cohabit without the religious or legal constraints of spousal status. However, such relationships challenge the conservative norms of Indian society, where sexual experiences outside of marriage are still widely considered taboo.⁴

II. LIVE-IN RELATIONSHIP: A NEW NORMAL IN INDIAN SOCIETY

Despite societal criticism, there is a growing trend of live-in relationships among young Indian couples. A live-in relationship, as an arrangement, allows a man and a woman to cohabit under the same roof without getting married. It is a 'walk-in and walk-out' arrangement that gives couples the chance to exit the relationship whenever they wish. Such an arrangement is viewed as an alternative to marriage by young couples who do not wish to be entangled in the responsibilities of married life.

These types of relationships have become commonplace in metropolitan cities, where individual freedom is a top priority among the youth. According to a survey conducted on adults aged 18-35, more than 80% of respondents support live-ins as a way of life. Of these, 26% stated that they would choose lifelong live-ins as an option over marriage. Such relationships are commonly found in domestic cohabitation between two unmarried heterosexual individuals, or between same-sex couples, or couples in adulterous live-in relationships.⁵

Live-in Relationships have been appreciated by many for various reasons, such as⁶:

- Space Autonomy to both the partners who live independent lives.
- Sense of freedom as well as the feeling of a married life without the restrictions posed by the institution of marriage.
- Minimal responsibilities where the couple can learn to live together and understand the division of work.

⁴ Rohit Ray, "Evolution of the live-in relationship vis-a-vis personal laws", 2023, https://www.google.com/url?sa=t&source=web&rct=j&url=https://www.livelaw.in/amp/columns/evolution-of-the-live-in-relationship-in-india-vis-a-vis-personal-law-218948&ved=2ahUKEwji8t-E4-_8AhVDcGwGHS3UBaoQFnoECBkQAQ&usg=AOvVaw1kJziCZgjFzDYdYWkbnNNJ6

⁵ Shraddha Jain, Are live-in relationships legal in India, https://blog.iplayers.in/are-live-in-relationships-legal-in-india/?amp=1#Forms_of_live-in_relationships_in_India

⁶ Marriage vs. live-in relationship: Two different approaches to exploring love and companionship <https://timesofindia.indiatimes.com/life-style/relationships/love-sex/marriage-vs-live-in-relationship-two-different-approaches-to-exploring-love-and-companionship/articleshow/71582056.cms>

- Freedom to walk out without getting involved into any legal formalities to dissolve the relationship. One can move out or stay whenever he or she feels things aren't working out. There remain no regrets if things don't work out as both can move on with their lives.
- Test to check the compatibility of couples who doubt the success of their relationships in the long run.
- Alternative to marriage as the procedures and customs involved in marriage are restrictive.

(A) Legal Status of Live-in Relationships in India

In India, cohabitation without marriage was once considered taboo during British rule; however, this mindset has evolved, especially in metropolitan areas where individuals are increasingly choosing live-in relationships over traditional marriage. As the concept of live-in relationships has gained recognition relatively recently, there was no specific legislation that delineates the rights and responsibilities of individuals in live-in relationships, including the status of children born to such couples. The judicial decisions over time have progressively legitimized live-in relationships and contributed to the development of legal precedents on this matter.⁷

The legal recognition of live-in relationships was established by the Supreme Court in a series of landmark cases. In the case of *Badri Prasad v. Dy. Director of Consolidation*⁸, it was ruled that partners cohabiting over an extended period could be presumed to be akin to a married couple. Subsequently, in *Payal Sharma v. Superintendent, Nari Niketan and ors*⁹, it was clarified that while live-in relationships might be deemed unconventional by societal standards, they are not unlawful, allowing individuals to reside together without formal marriage. In the case of *Tulsa v. Durghatiya*¹⁰, it was affirmed that children born from such unions would be considered legitimate and entitled to inheritance rights. Furthermore, in *S. Khushboo v. Kanniammal and Anr.*¹¹, the Supreme Court recognized cohabitation as a fundamental aspect of the right to life under Article 21 of the Constitution, emphasizing that living together by choice is not a criminal act. It was also underscored that there is no legal prohibition on premarital sex. Another significant ruling by the Supreme Court in *D. Velusamy v. D.*

⁷ Madhur Sharma, Jheelum Basu, Live-In Relationships In India: Legal But Do They Have Enough Safeguards?, <https://www.outlookindia.com/national/live-in-relationships-in-india-legal-but-do-they-have-enough-safeguards-news-238838>

⁸ 1978 AIR 1557

⁹ 2001 SCC All 332

¹⁰ 2008 All SCR 700

¹¹ 2010 (4) SCALE 462.

*Patchaiammal*¹² acknowledged live-in relationships as being "in the nature of marriage," further solidifying their legal standing.

The Indian Judiciary maintained a neutral stance regarding the acceptance or rejection of live-in relationships, prioritizing the delivery of justice to all parties involved. The primary focus of the judiciary was to ensure that justice is served by considering social and constitutional factors in each case. It has been firmly established by judicial pronouncements that engaging in live-in relationships is not a criminal offence; it is affirmed as an unrestricted right of consenting adults, despite potential disapproval from more conservative segments of society.¹³

The Uttarakhand Government has recently introduced a Uniform Civil Code that applies to residents of Uttarakhand, whether living within the state or elsewhere in India. This code includes a specific section dedicated to regulating live-in relationships. According to the code, a live-in relationship is defined as a cohabitation between a man and a woman in a shared household resembling a marital relationship, as long as such unions are not prohibited. The code mandates the compulsory registration of live-in relationships for heterosexual couples, both at the commencement and dissolution of the relationship, with records maintained at a designated police station. Failure to register a live-in relationship may result in a jail term of up to three months, with a six-month term for non-production of the registration certificate upon conviction. Furthermore, the code ensures provisions for the maintenance of women abandoned by their partners and acknowledges children born within live-in relationships as legitimate.¹⁴

III. RIGHTS AVAILABLE TO WOMEN IN MARRIAGE VIS A VIS LIVE-IN RELATIONSHIP

The changed notions of Young generation of Indian society about live-in relationships have led to recognition of certain rights of a woman living in a live-in relationship by the judiciary, similar to that of a married woman. Some of those rights are:

(A) *Right to get Maintenance*

In marriage, husbands have a legal obligation to support their families, particularly their wives and children. This grants married women the right to seek financial support from their husbands if they are unable to sustain themselves. This entitlement extends to the dissolution of the marriage, where the wife can claim maintenance. Section 125 of the Code of Criminal Procedure, 1973 (CrPC), provides a legal avenue for wives to demand maintenance.

¹² 2011 SC 479

¹³ *Supra* 7

¹⁴ Kartavi Satyarthi, Namrata Mukherjee, Hits and misses of Uttarakhand Uniform Civil Code: What the Bill does, and does not do <https://indianexpress.com/article/explained/explained-law/uttarakhand-uniform-civil-code-takeaways-9147379/>

Additionally, various personal laws, including the Hindu Adoptions & Maintenance Act, 1956; the Hindu Marriage Act, 1956; and the Muslim Women (Protection of Rights on Divorce) Act, 1986, recognize and enforce the right to maintenance.

The question that emerged before the courts pertained to whether a woman in a live-in relationship could claim maintenance. Initially, it was established that a woman not legally married was not eligible for maintenance under Section 125 of the CrPC. However, the judiciary later recognized Section 125 CrPC as a social welfare legislation designed to aid destitute women, thus rejecting arguments regarding the validity of marriage. In the landmark case of *Chanmuniya v. Virendra Kumar Singh Kushwaha and another*¹⁵ the court emphasized a broad interpretation of the term "wife" to encompass long-term cohabiting partners. This landmark ruling emphasized that strict proof of marriage should not be a prerequisite for maintenance under Section 125 CrPC. The Indian Supreme Court has, therefore, extended the definition of 'wife' to include relationships not legally bound by marriage but recognized as legitimate.¹⁶ However, a woman in a live-in relationship is ineligible for maintenance under Section 125 CrPC unless she meets specific parameters, as outlined in the case of *D.Velusamy v. D.Patchaiammal*¹⁷

(B) Right to Inheritance of Property

In India there are specific aspects concerning women's legal rights regarding the property. Marriage does not affect married women's property rights in India. If it is her parental property, she has the same rights as that of a son. With regard to right in the husband's property, the married woman has no right to the acquired property of her husband during his life. Although, a widow has legal rights to her deceased husband's property. If she has invested in joint property and the spouses have decided to divorce, she has the right to get proportional share to the percentage she has invested.¹⁸

After the amendment of 2005 in the Hindu Succession Act of 1956 women have the right to ancestral property and self acquired property regardless of her marital status. Therefore, regardless of whether a woman is married or living with someone, she has the right to inherit her parent's property at birth. While the property she has acquired for herself will be divided

¹⁵ (2011) 1 SCC 141

¹⁶ Right to Maintenance Sec 125 <https://www.legalservicesindia.com/article/1906/right-to-maintenance-section-125-crpc.html>

¹⁷ (2010)10 SCC 469.

¹⁸ Legal Rights of Married Women in India, <https://restthecase.com/knowledge-bank/legal-rights-of-married-women-in-india>

per her will.¹⁹ However women in live- in relationships do not enjoy automatic right to inheritance in their partner's property and there is no specific provision in the law governing the same.

(C) Right to get protection from Domestic Violence

For protection of women from Domestic Violence, The Protection of Women from Domestic Violence Act, 2005 was enacted which provides for security and protection of wife. The Act allows the aggrieved person in a domestic relationship to make a complaint regarding domestic violence in a shared household. Here the interpretation of the term 'domestic relationship' as defined in sec 2(f) of the Act is very important to understand its application. "*Domestic Relationship means a relationship between two persons who live or have, at any point of time, lived together in a shared household, when they are related by consanguinity, marriage, or through a relationship in the nature of marriage, adoption or are family members living together as a joint family.*" This definition shows that the word domestic relationship covers some inherent or essential characteristics of marriage though not a marriage that is legally recognized.²⁰ Thus it covers within its ambit the live- in relationship.

The Domestic Violence Act was perhaps the First legislation which acknowledged live-in relationships by giving rights and protection to those females who are not lawfully married nonetheless living under the same roof in relationship, which is like marriage but not marriage, furthermore akin to wife , though not equivalent to wife. However in the case of *D.Veluswamy v. D.Patchaiammal*²¹The Supreme Court observed that not all live- in relationships will amount to relationships in the nature of marriage to get the benefit of the Domestic Violence Act. Some conditions needs to be fulfilled and proved which are as follows²²-

- 1) Both the parties must live together as husband and wife and are recognized as husband and wife in front of society.
- 2) They must be of a valid legal marriageable age.
- 3) They should qualify to enter into marriage. Qualification here means none of the partners should have a spouse living at the time of entering into a relationship.
- 4) They must have voluntarily cohabited for a significant period of time and must have lived together in a shared household.

¹⁹ Property Rights of a Female in a Live-In Relationship and The Factors Influencing Them, <https://www.nobroker.in/blog/rights-of-a-female-in-a-live-in-relationship/>

²⁰ Indra Sarma v. V.K.V Sarma, AIR 2014 SC 309

²¹ (2010)10 SCC 469

²² *Ibid*

(D) Right to get Visa Extension

In the case of *Svetlana Kazankina v. Union of India*²³ the High Court of Delhi answered the question of extending an entry visa to a foreign national who was in a live-in relationship with an Indian. An Entry Visa is a kind of visa which is given for specific purposes to foreign nationals for any purpose not covered specifically under any of the other visa categories. It is given to foreign nationals of Indian origin, his/her spouse and dependent children visiting India.²⁴

In this case visa extension was denied to the petitioner because he was not able to produce any proof of marriage. The Court observed that the visa extension guidelines meant for foreigners married to Indian citizens could also be extended to foreign nationals in live-in relationships with Indians. The rules allowing the extension of visas to foreigners married in India are made with the objective that such couples would enjoy friendship, love, and devotion. The Court stated that live-in relationships are now a reality of life and should not be regarded differently from marriages when granting visa extensions.²⁵

(E) Right to Privileged Communication

Section 122 of Indian Evidence Act, 1872²⁶ provides that no married person can be compelled to reveal any communication between him/her and his/her spouse during marriage, except with the consent of the other. The restriction is applicable to all communications between the spouses, regardless of its nature. The principle of privileged communication exists to safeguard the mutual trust between the partners in a marriage. However the term “marriage” itself has neither been defined in the Indian Evidence Act, 1872 nor the General Clauses Act, 1897. So the question arises whether the term ‘marriage’ covers a live-in relationship also. Since the term ‘marriage’ has not been defined and considering its increased recognition as part of the right to life and liberty; it is desirable to extend the application of the privilege to couples in live-in relationships.²⁷

²³ (2015) 225 DLT 613.

²⁴ Entry Visa, <https://www.indianembassydublin.gov.in/page/entry-visa2/>

²⁵ Legal status of Live-in Relationships in India: Mapping Indian Jurisprudence, <https://www.lawctopus.com/academike/live-in-relationships-in-india/>

²⁶ Sec 122 of Indian Evidence Act, 1872

Communications during marriage.—No person who is or has been married, shall be compelled to disclose any communication made to him during marriage by any person to whom he is or has been married; nor shall he be permitted to disclose any such communication, unless the person who made it, or his representative in interest, consents, except in suits between married persons, or proceedings in which one married person is prosecuted for any crime committed against the other.

²⁷ Saumya Shankar & Pratik Rath, Extending Privileged Communication to Live-in Partners: Protecting Mutual Trust, <https://criminallawstudiesnluj.wordpress.com/2022/05/28/extending-privileged-communication-to-live-in-protecting-mutual-trust/>

(F) Right to seek Restitution of Conjugal Rights

In a marriage there are certain rights which are available to the spouse and are considered as basic obligations. Such rights include the freedom to cohabit and have a sexual relationship with one's spouse. Numerous provisions of Indian personal law recognise the significance of conjugal rights in a marriage and thereby provides a remedy for restoration of such rights in case a spouse withdraws from cohabitation without cause.²⁸ There is provision for the restoration of conjugal rights in the Special Marriage Act of 1954 and the Hindu Marriage Act of 1955. The right to seek restitution of Conjugal rights is available to a married woman. However no such right is available in case of live-in relationships as there is no obligation on the parties to live together. Live-in relationships are 'walk in walk out' relationships which provide freedom to move out without any obligation.

(G) Right to take action for Bigamy

Under Indian marriage laws, entering into a marriage while one's spouse is still alive constitutes the offense of Bigamy. A second marriage contracted during the lifetime of a spouse is deemed illegal and void. Section 494 of the Indian Penal Code explicitly criminalizes bigamy, and personal laws such as the Hindu Marriage Act, 1956, contain provisions addressing this offense. In cases where a husband commits the offense of bigamy, the wife holds the right to take legal action. However, such recourse is unavailable to women in live-in relationships, as their status remains unmarried, and there are no legal restrictions preventing them from marrying another individual outside of that relationship. In the case of *Alok Kumar v. State*²⁹, the court characterized a live-in relationship as a casual arrangement, devoid of formal commitments, allowing partners to exit without consequences. Consequently, partners in a live-in relationship cannot legally complain of infidelity or immorality due to the absence of legal ties.

(H) Right to Stridhan

Stridhan comprises property that a woman receives during her lifetime, whether before marriage, at the time of marriage, or during childbirth. Women possess an absolute and unalienable right to their stridhan, bestowed by their parents or relatives, even if it is entrusted to the custody of their husbands or in-laws. Section 18(e) of the Protection of Women from

²⁸ Understanding Restitution of conjugal rights, <https://blog.finology.in/Legal-news/restitution-of-conjugal-rights>

²⁹ *Alok Kumar v. State* (2010) Delhi High Court

Domestic Violence Act, 2005³⁰ and Section 14(1) in the Hindu Succession Act 1956³¹ recognises the absolute right of a woman over her stridhan.

However, the concept of stridhan does not extend to live-in relationships, as gifts or property are typically designated as stridhan during or before marriage only. Given the absence of marriage in live-in relationships, there exists no legal basis to claim stridhan rights in such scenarios.

(I) *Right to Shared Household/Matrimonial Home*

Every married woman is entitled to reside in her marital home. Regardless of the circumstances, a wife has the legal right to remain in the matrimonial residence, even following the death of her spouse. In the event of a divorce, she may opt to continue residing in the marital home until suitable alternative accommodation is arranged. Furthermore, she retains the option to remain in the residence if she desires. Importantly, the right to the marital home is inviolable and cannot be revoked, even amidst ongoing domestic violence proceedings.³²

In interpreting the term "Shared Household" as defined in Section 17 of the Protection of Women against Domestic Violence Act, 2005, the Supreme Court elucidated that the provision extends to women of all religious denominations. Whether she be a mother, daughter, sister, wife, mother-in-law, daughter-in-law, or any other woman in a domestic relationship, each has the legal entitlement to reside in a shared household. Consequently, the provision encompasses women living in live-in relationships, underscoring the Act's broad protection of women's housing rights across diverse familial structures.³³

It must be pointed out that 'Shared Household' would only mean the house belonging to or taken on rent by the husband, or the house which belongs to the joint family of which the husband is a member.³⁴ Where property exclusively belongs to the father-in-law or the mother-in-law or to both of them in which the husband has no right, title or interest, the same cannot be called a

³⁰ Sec 18- Protection orders:

The Magistrate may...prohibit the respondent from-

(e) alienating any assets, operating bank lockers or bank accounts used or held or enjoyed by both the parties, jointly by the aggrieved person and the respondent or singly by the respondent, including her stridhan or any other property held either jointly by the parties or separately by them without the leave of the Magistrate;

³¹ Sec 14 - Property of a female Hindu to be her absolute property:

(1) Any property possessed by a female Hindu, whether acquired before or after the commencement of this Act, shall be held by her as full owner thereof and not as a limited owner.

³² Important legal rights every married woman should know, <https://m.timesofindia.com/life-style/relationships/love-sex/important-legal-rights-every-married-woman-should-know/photostory/81469989.cms>

³³ Prabha Tyagi v. Kamlesh Devi (2022) Live Law SC 474

³⁴ S.R. Batra And Anr v. Smt. Taruna Batra (15 December, 2006)

"share household".³⁵

(J) Right to claim legitimacy of child

In personal laws, the legitimacy of children is intricately tied to the marital status of their parents. The social standing of offspring is directly influenced by the actions of their parents. Children born within the confines of a legally recognized marriage are deemed legitimate. However, if parents engage in an ill-considered or invalid marriage, or if a child is conceived outside of wedlock, the innocent child bears the stigmatizing label of being illegitimate.³⁶

A married woman holds the right to assert the legitimacy of her child. In India, Section 112 of the Indian Evidence Act 1872 stipulates that a child's legitimacy is established only if they were born during the validity of their parents' marriage.

In *S.P.S Balasubramanyam v. Suruttayan*,³⁷ the Supreme Court addressed the legitimacy of children born from live-in relationships for the first time. The court ruled that if a man and woman cohabit under the same roof for an extended period, there arises a presumption, as per Section 114 of the Evidence Act, that they are living as husband and wife, thereby legitimizing any children born to them. Subsequently in *Revanasiddappa v. Mallikarjun*,³⁸ the court emphasized that irrespective of the relationship status between parents, the child born from that union should be treated independently from their parents' relationship.³⁹

(K) Right to take action against Dowry and Harassment

Under the Dowry Prohibition Act of 1961, a woman has the legal recourse to report any exchange of dowry involving her parental family or in-laws in marital affairs. However, this Act does not explicitly extend to cases of live-in relationships. In several court rulings, it has been observed that since dowry pertains to demands made in connection with formal or ceremonial marriages, it does not apply to live-in relationships, which lack such formalities.

Sections 304B and 498A of the Indian Penal Code (IPC) criminalize the exchange of dowry and any form of harassment related to it. Section 498A specifically targets husbands or their relatives who subject women to cruelty. To establish an offense under Section 498A, three essential conditions must be met:

(a) The woman must be married;

³⁵ Barun Kumar Nahar v. Parul Nahar & Anr. (5 February, 2013)

³⁶ Illegitimacy under Hindu Law, <https://www.lawtopus.com/academike/illegitimacy-hindu-law/>

³⁷ 1994 SCC (1) 460

³⁸ (2011) 11 SCC 1

³⁹ Shweta Pathania, Legal Rights and Status of Children Born out of Live-in Relationships, <https://www.latestlaws.com/articles/legal-right-and-status-of-children-born-out-of-living-relationships-188528>

- (b) She must be subjected to cruelty or harassment; and
- (c) Such cruelty or harassment must have been shown either by the husband of the woman or by the relative of her husband.⁴⁰

One crucial requirement of Section 498A is that the victim must be a married woman, thus precluding women in live-in relationships from filing cases under this provision. In the case of *Koppiseti Subbarao Subramanian v. State of Andhra Pradesh*,⁴¹ despite the defendant's harassment of his live-in partner for dowry, the court dismissed his argument that Section 498A was inapplicable, citing the absence of a formal marriage between the parties.

Similarly, Section 304B of the Indian Penal Code addresses dowry death, stipulating that if a woman dies from burns, bodily injury, or under abnormal circumstances within seven years of her marriage, and it is proven that she was subjected to cruelty or harassment for dowry demands shortly before her death, it constitutes "dowry death." Consequently, marriage is a prerequisite for invoking Section 304B, leaving women in live-in relationships without its protection.

(L) *Right to seek divorce*

In a marital relationship, couples are endowed with various rights, including the right to dissolve their union. Divorce proceedings can be initiated based on specific grounds outlined in personal laws. When cohabitation ceases to bring happiness to both parties, they have the option to seek divorce by mutual consent. In contrast, in a live-in relationship, there is no requirement for formal divorce proceedings; individuals can simply choose to part ways without any legal formalities.

IV. CONCLUSION

While India has undeniably made strides in various aspects, it remains ensnared by traditional beliefs and taboos. Despite the widespread adoption of advanced technology like high-quality smartphones, the acceptance of live-in relationships lags behind. Unlike married couples, those in live-in relationships often face societal discrimination, especially women, who endure significant hardships due to the absence of clear legal frameworks. Although a Supreme Court ruling has granted women in such relationships a status akin to that of wives, the lack of social protections renders them vulnerable to exploitation and abuse. Urgent action is required to safeguard these women by enacting specific laws tailored to their unique circumstances. The recent move by the Uttarakhand government to enact a Uniform Civil Code regulating live-in

⁴⁰ U. Suvetha v. State, (2009) 6 SCC 757.

⁴¹ AIR 2009 SC 2907

relationships is a commendable step towards bringing about positive change in this area.
