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Honour-Based Violence and the Limits of Legal Protection for Reproductive Autonomy in India: A Critical Socio-Legal Analysis

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ABSTRACT

*This article critically examines honour-based violence (HBV) in India through the analytical lens of reproductive autonomy, situating it within broader socio-legal structures of caste, kinship, and gender regulation. It argues that while Indian constitutional jurisprudence has progressively recognised elements of reproductive and decisional autonomy under Articles 14, 19, and 21, the legal framework remains constrained in addressing HBV as a systemic violation of bodily integrity. It draws upon doctrinal analysis of key Supreme Court decisions, including *Shakti Vahini v. Union of India*, the study highlights the gap between formal rights recognition and their substantive enforcement in socially coercive contexts. The article further explores how extra-legal actors, including caste councils and familial institutions, mediate reproductive choices, thereby limiting the effectiveness of state protection mechanisms and producing persistent vulnerabilities in inter-caste and inter-community relationships.*

Keywords: *Honour-Based Violence, Reproductive Autonomy, Socio-Legal Analysis, Constitutional Rights, Caste-Based Violence*

I. INTRODUCTION

Honour Based Violence (HBV) in India, represents a long-standing and deeply ingrained socio-legal form of violence and regulation, extending far beyond episodes of violent assault toward women and their families. Such violence has historically been articulated and recognized as 'Honour Killings' as singular events, whereas they can be best described as a systemic means of controlling women's bodies in terms of marriage, sexual expression, and reproduction. HBV thus functions as a means through which caste based and kinship driven norms are upheld and therefore shape and limit women's reproductive autonomy directly and indirectly.

The concept of reproductive autonomy is defined here as the ability to independently determine reproductive outcomes, including the ability to select one's own mate/partner, enter into a

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marriage arrangement and maintain bodily integrity. Reproductive autonomy has been increasingly accepted by the Indian judiciary and recognized as a fundamental aspect of the right to life and personal liberty granted under Article 21 of the Constitution of India.¹ The Supreme Court has confirmed that the ability to autonomously decide upon one's intimate relationship(s) is legally protected under the Indian Constitution, specifically in *Shafin Jahan v. Asokan K.M.*, wherein the court ruled that an individuals' ability to independently select his/her partner was a core element of an individual's freedom.² Nonetheless, despite these established legal protections, women's lived experiences continue to demonstrate that reproductive autonomy remains severely restricted when societal structures, particularly caste hierarchies and concepts of familial honour, dictate how a woman may exercise her autonomous choice.

Thus the tension between the established constitutional protections afforded to women and those restrictions placed upon women due to societal pressures is the primary focus of this paper. Despite the Supreme Court issuing comprehensive guidelines designed to prevent, remedy and punish Honour-Based Crimes in *Shakti Vahini v. Union of India*, the continued existence of HBV demonstrates that although legal frameworks exist to protect against honour-based crimes, such frameworks offer little transformative power when confronting the deep-seated cultural/societal enforcement mechanisms responsible for sustaining such practices.³ These mechanisms often rely on informal institutional arrangements such as khap panchayats (village councils), caste councils, and extended kinship networks that serve as secondary regulatory frameworks governing acceptable and legitimate marital and reproductive options.

The failure of existing legal protections offered to women in the face of Honour-Based Crime is attributable not simply to insufficient doctrine, but also structural barriers related to enforcement and social legitimacy. Law Enforcement Agencies typically operate within the very same sociocultural environment that gives rise to Honour-Based Violence and therefore experience inconsistent application of safeguards designed to protect victims and delayed response times when inter-caste or inter-community couples receive threats. Therefore, a woman's reproductive autonomy comes to depend on the level of societal approval she receives for exercising her autonomous choice rather than being guaranteed by constitutional rights.

In light of the above considerations, this paper explores the limitations placed on legal protections for reproductive autonomy in India as it relates to Honour-Based Violence (HBV). The paper assesses whether constitutional and legislative frameworks provide adequate legal

¹ *Justice K.S. Puttaswamy v. Union of India*, (2017) 10 S.C.C. 1 (India).

² *Shafin Jahan v. Asokan K.M.*, (2018) 16 S.C.C. 368 (India).

³ *Shakti Vahini v. Union of India*, (2018) 7 S.C.C. 192 (India).

protections for reproductive decision making in societies that fundamentally reject such autonomy through social norms. The central thesis presented is that while Indian law formally recognizes reproductive autonomy as a fundamental right, the legal framework protecting reproductive autonomy is structurally compromised by the ongoing presence of systems of social regulation based on caste and honour.

The organization of this paper is as follows: It begins by examining the broader socio-legal discussion surrounding reproductive autonomy in the context of HBV; it next examines relevant judicial and constitutional developments; thirdly, it analyzes the structural impediments imposed by caste and kinship systems; fourthly, it examines the limits of legal protections in practice, and lastly it compares formal recognition with actualized enforcement.

II. CONCEPTUAL FRAMEWORK

It is vital that Honour-Based Violence (HBV) be viewed as more than just a violent expression of gendered and familial violence; rather as an organized mechanism of social regulation controlling reproductive autonomy. Reproductive autonomy, in the Indian socio-legal environment, can extend beyond traditional notions of biological reproduction and encompass decision-making power over sexual relations, marriage, sex, and personal bodily integrity. The Supreme Court's acknowledgment of decision-making autonomy as being integral to dignity under Article 21 of the Constitution of India provides a basic constitutional foundation for such a definition of reproductive autonomy. However, HBV occurs specifically at the point where constitutional guarantees of autonomy meet deeply ingrained systems of caste-based and kinship driven social regulation.

As a form of socio-legal regulation, HBV serves as an enforcement tool to maintain endogamy and preserve caste boundaries via the regulation of intimacy. More recent scholarship has begun to conceptualize caste not simply as a hierarchically defined identity system but also as a type of biopolitical governance regulating the body, sexuality, and reproductive relationships across generations.⁴ Therefore, honour becomes a social technology through which violations to specified marital and reproductive norms are disciplined often violently or through coercion. Thus, killings and intimidations of individuals engaged in inter-caste and inter-community/inter-faith relationships are not accidental but are structurally established in the maintenance of social order.

⁴ *Justice K.S. Puttaswamy v. Union of India*, (2017) 10 S.C.C. 1 (India); *Shafin Jahan v. Asokan K.M.*, (2018) 16 S.C.C. 368 (India).

A regulatory role of HBV is clearly demonstrated in the manner it affects reproductive autonomy, since HBV directly attacks the ability to make free-choice relationships leading to reproduction outside the bounds of caste-endogamous marriages. Feminist legal scholars have argued that autonomy cannot be interpreted in formalistic terms i.e., having a choice in isolation from societal conditions of coercion.⁵ In societies characterized by caste hierarchy/patriarchal authority, reproductive decisions are influenced not only by individual preferences but by threats of social sanctions, exclusion and violence. Thus, HBV serves as a coercive apparatus rendering reproductive autonomy dependent on compliance with prevailing social norms.

Significantly, however, this coercive regulation is not limited to direct physical violence but encompasses ongoing forms of surveillance and social control exercised by families, caste councils and informal community organizations. Studies based on field research into khap panchayat and caste-based adjudication mechanisms illustrate how these types of mechanisms continually influence marital selection often enacting proscriptions against inter-caste unions under the rubric of 'honour.'⁶⁷These mechanisms provide a secondary normative system competing with constitutionally guaranteed rights, thus reducing the enforceability of reproductive rights in practice.

Therefore, HBV can be seen as a component of a larger socio-legal regime of reproductive governance, wherein law, society and informal institutions engage in both complementary and conflicting interactions. Even though constitutional jurisprudence establishes a person's right to select their own mate and exercise bodily autonomy; however, social structures establish limiting norms defining which options are acceptable to the public. Consequently, a disjuncture develops between legally recognized rights and substantively realized autonomy, especially among those individuals in inter-caste relationships who are disproportionately exposed to honour-based coercion.

More recently, empirical and doctrinal research has also identified difficulties experienced by state institutions in intervening in HBV related offenses due to deep-rooted levels of caste norms in local governance structures/law enforcement practices.⁸ Such findings reinforce the structural dimensions of the issue indicating that HBV cannot be appropriately addressed through the sole

⁵ Gurram Ashok & Ramdas Rupavath, *The Biopolitics of Caste: Analysing the (Dis)honour Killings in South India*, 17 *Contemp. Voice Dalit* 373 (2022).

⁶ Martha Albertson Fineman, *The Vulnerable Subject and the Responsive State*, 60 *Emory L.J.* 251 (2010).

⁷ Priyadarshini Bhattacharya, "Honor" Killings and Customary Laws: A Case Study of Khap Panchayats in Haryana, India, 5 *Violence: Int'l J.* 3 (2023).

⁸ Ketki Dalvi & Ramesh Kumar, *Khap Panchayat: Self Proclaimed Adjudicating Mechanism in Case of Honour Killings in India*, 4 *J. Informatics Educ. & Res.* (2024).

means of criminalization but will require greater socio-legal engagement with the normative bases for caste and honour.

III. LITERATURE REVIEW

The literature on Honour Based Violence (HBV) in both the international and Indian contexts has developed substantially. Most of the research treats HBV as a type of gender based violence resulting from patriarchal notions of family honour and control over female sexuality; also, as a means to protect community reputation. For decades, international feminist scholarship has asserted that honour-based violence serves as a tool to discipline women's sexual and marital autonomy as part of collectivist societies.⁹ In India, similar to other areas of the world, researchers have situated honour killings within a larger structure of patriarchal control. Researchers have indicated that families and communities are often responsible for implementing normative marital choices, especially when the couple is from different castes and religions.¹⁰ Research on HBV however mostly focuses on it as one example of extreme forms of gender violence rather than developing a connection to the larger systems of reproductive regulation.

Research on reproductive autonomy has provided considerable insight into the importance of recognizing the right to bodily integrity, decision making authority and reproductive freedom as essential elements of human dignity and individual liberties. The definition of reproductive autonomy was considerably defined through constitutional law related to privacy and individual liberties after the Supreme Court recognized the right of individuals to make decisions regarding their own private lives in Justice K.S. Puttaswamy vs. Union of India. In Shafin Jahan Vs. Asokan K.M., the Supreme Court further clarified that individuals' ability to select whom they wish to marry is a crucial element of Article 21 protections. Although substantial progress has been made legally to recognize reproductive autonomy, many feminist scholars point out the difference between formally protecting individuals' autonomy and realizing this autonomy in practice due to socially restrictive conditions. Scholars argue that legal frameworks often ignore the systemic inequities that affect individuals' decisions about reproduction.

Additionally, research concerning caste, marriage, and social regulation in India has illustrated that marriage selections are highly influenced by caste endogamy systems which serve as methods for maintaining social order and purity standards. Studies in sociology and socio-law

⁹ Lynn Welchman & Sara Hossain eds., *Honour: Crimes, Paradigms and Violence Against Women* (Zed Books 2005).

¹⁰ K.S. Kumar, Honour Killings in India: A Socio-Legal Perspective, 52 J. Indian L. Inst. 123 (2010).

have illustrated that endogamous marriage customs are not simply culturally preferred ways to get married but are instead a methodically established system of social control that regulates reproductive partnerships and maintains caste barriers.¹¹ Organizations like *khan panchayat* and kinship networks have been extensively studied as non-formal regulatory agencies that enforce caste norms using social sanctions, intimidation, and in some instances violence. Both informal systems of regulation and formal systems of legal enforcement interact with each other as dual systems governing intimate and reproductive aspects of life.¹²

Although all three fields of study provide rich data, there remains a significant analytic void. Many researchers view Honour-Based Violence primarily from either a crime-related perspective or gender violence-related perspectives. Moreover, many researchers examine reproductive autonomy in isolation from constitutional and feminist legal discourses. Additionally, although caste-based social regulation can be examined independently from both honour-based violence and reproductive rights discourses, they are rarely analyzed collectively. This segmentation contributes to a segmented understanding of how honour-based violence acts as a method to regulate reproductive autonomy by enforcing caste endogamy and restricting marital choice.

Moreover, there exists a need for more comprehensive socio-legal research that combines HBV, reproductive autonomy and limitations of legal protection into a single framework for analysis. More specifically, current literature fails to illustrate how constitutional provisions for reproductive autonomy are structurally impeded by informal caste-based systems of governance and honour-based systems of regulation. This article attempts to fill this gap by conceptualizing HBV not solely as gendered violence or criminal deviance but as a socio-legal method that directly limits reproductive autonomy within systems comprised of multiple layers of legal and extra-legal regulations.

IV. RESEARCH METHODOLOGY

This study employs a doctrinal-cum-socio-legal methodological framework grounded in critical legal studies and feminist jurisprudence to examine Honour-Based Violence (HBV) in relation to reproductive autonomy in India. The doctrinal component undertakes a systematic interpretation of constitutional provisions, particularly Articles 14, 19, and 21 of the Constitution of India, alongside a close analysis of relevant Supreme Court jurisprudence, including *Shakti Vahini v. Union of India* and *Shafin Jahan v. Asokan K.M.*, to assess the

¹¹ Dipankar Gupta, *Interrogating Caste: Understanding Hierarchy and Difference in Indian Society* (Penguin 2000).

¹² Archana Parashar, *Women and Family Law Reform in India* (Sage Publ'ns 1992).

normative scope of reproductive autonomy within Indian constitutional law. Complementing this, the socio-legal component situates legal doctrine within the lived realities of caste-based social organisation, kinship structures, and informal governance mechanisms such as khap panchayats, which shape and constrain reproductive decision-making. The study draws upon peer-reviewed socio-legal and feminist scholarship, as well as policy and empirical studies, to critically interrogate the gap between formal legal recognition and substantive enforcement.

V. HONOUR-BASED VIOLENCE AND LEGAL PROTECTION IN INDIA

The existing constitutional structure in India affords a rich conceptual base to safeguard the entitlements of individual autonomy, dignity, and decisional authority; each of these entitlements is strongly associated with Honor Based Violence (HBV) cases. Articles 14, 19 and 21 of the Constitution provide a comprehensive normative framework for guaranteeing equal treatment before the law, freedom of speech and association, and the right to life and personal liberty. The Supreme Court has developed a progressive interpretation of Article 21 to encompass within its scope the right to live with dignity and autonomy to make intimate decisions about one's own personal life. In *Shafin Jahan v. Asokan K.M.*, the Court unmistakably established that it is an essential component of an adult's individual liberty to choose a life partner without being subject to parental, community or societal approval. Therefore, the juridical recognition provided in this case locates reproductive and relational autonomy as constitutionally protected rights that go beyond mere formal liberty to substantial decision-making independence.

Although there have been numerous judicially determined doctrinal clarifications regarding the extent of the protection afforded by constitutional guarantees in the context of HBV, the evolution of the judicial response to HBV has primarily occurred in the form of incrementally applied and reactive remedies, as opposed to transformative changes. A major landmark in this regard was *Shakti Vahini v. Union of India*, where the Supreme Court recognized the pervasive nature of the threat posed by honour-based crimes and issued specific guidelines related to prevention, remedy and punishment. Among other things, these guidelines required the establishment of a mechanism at the district level to prevent honour based violence; appointment of nodal officers to deal with honour based violence; police protection for couples who were threatened; and expeditious prosecution of perpetrators of honour based violence. Additionally, the court emphasized that honour could never be used as a legitimate basis for using violence and that the state had a positive duty to protect individuals who exercised their constitutional rights.

While Shakti Vahini may represent an important development in terms of providing a significant doctrine clarification, its potential impact is largely contingent upon successful administrative implementation rather than enforcement by the courts. Further supplementation of constitutional protections occurs through provisions under the Indian Penal Code, 1860, specifically Sections 302 (murder); Section 120B (criminal conspiracy); and Section 506 (criminal intimidation) that provide theoretical bases for prosecuting perpetrators of honour based violence. However, these provisions are severely limited due to evidentiary issues; delayed investigations; and reluctance of witnesses to testify in socially charged cases. Empirical research conducted recently indicates that conviction rates in honour killing cases are disproportionately low, indicative of systemic enforcement failures rather than lack of legislation.¹³

The continued occurrence of HBV despite the presence of constitutional and penal law safeguards demonstrates that there exists a fundamental structural deficiency in the enforcement apparatus. Implementation of Supreme Court directives has been irregular throughout different states, with many jurisdictions failing to establish requisite mechanisms to prevent honour based violence or otherwise coordinate effectively among various administrative branches. Furthermore, although law enforcement agencies generally operate under social cultural constraints similar to those of caste/kinship hierarchies that give rise to HBV, they are typically hesitant to intervene in disputes arising between persons from different castes or communities because these types of disputes are viewed as potentially socially volatile. Consequently, law enforcement agencies are reluctant to provide adequate protection for couples facing immediate danger.

Additionally, informal regulatory bodies such as khaps (caste councils) and caste councils continue to maintain considerable influence over local dispute resolution processes and social governance processes. Although these entities have been condemned by judges, they continue to play important roles in rural socio-political dynamics and thus act as de facto alternative normative authorities.¹⁴ Often, the resolutions made by these informal bodies reaffirm endogamy and legitimize social sanctions placed upon individuals who breach specified caste boundaries. The co-existence of informal regulatory structures with formally sanctioned legal frameworks produces a dual system of governance whereby constitutional rights exist in theory but are frequently undermined in practice.

¹³ National Crime Records Bureau, *Crime in India 2023* (Ministry of Home Affairs 2024).

¹⁴ Law Commission of India, *Prevention of Interference with the Freedom of Matrimonial Alliances (in the name of Honour and Tradition): A Suggested Legal Framework*, Rep. No. 242 (2010).

Moreover, the legal regime governing HBV in India is characterized by a paradox of strong normative acknowledgement yet weak structural enforcement. Although the judiciary has clearly articulated that honour can never be cited as a justification for violence and affirmed the pre-eminence of individual autonomy, the conversion of these stated ideals into tangible protection remains unsteady. The distance between normative articulations and practical enforcement illustrates limitations inherent in the use of law as a means to protect individuals living in socially coercive environments where law must simultaneously interact with entrenched systems of caste-regulated behaviour and community-based control.

VI. STRUCTURAL CONSTRAINTS ON REPRODUCTIVE AUTONOMY

Caste endogamy is more than just a cultural norm; it's a systemic structure governing what marriages are acceptable and therefore governing the social reproduction of hierarchy generation after generation. In this way, marriage serves as a regulatory site for maintaining caste boundaries and any violation of these endogamous boundaries is typically viewed as a disruption to the collective social order.¹⁵

In addition to regulating marriage, the kinship structure in India also regulates reproductive decision making. Kinship extends far beyond the nuclear family to include extended family members and the entire community. These extended family/communities serve as mechanisms of surveillance on all relationships and intervene when they perceive violations of established relationships. Therefore, while there are certainly laws that regulate personal relationships, the regulation of these relationships occurs primarily in informal social interactions where honour becomes a community issue instead of an individual one. As such, reproductive decision-making is transformed into socially regulated actions that require approval, supervision, and possible punishment.

Honour operates as a fundamental organizing principle in this system of regulation. The relationship between an individual's (and especially a woman's) sexual/marital behaviour and her family/community's reputation is well-established. Therefore, when an individual makes reproductive decisions, those decisions are seen as public displays of morality/social conformity. Any decision made outside of the approved parameters (intercaste, etc.) will likely be defined as deviant, thus legitimizing violent responses. More recently, socio-legal scholars

¹⁵ Andre Beteille, *Caste, Class and Power: Changing Patterns of Stratification in a Tanjore Village* (Oxford Univ. Press 1965).

have demonstrated how these honour-based systems create constant forms of social pressure that may precede (or replace) physical violence and create a continuous climate of coercion.¹⁶

Moreover, the combination of caste endogamy, kinship based surveillance, and the logic of honour results in a highly constrained environment in which reproductive freedom exists. Where individuals have formally recognized rights to choose their own mates and reproductive options, they are frequently unable to exercise these rights due to fear of being ostracized from their families or communities and/or experiencing some form of violence. Thus, individuals may have the law on their side regarding their right to choose their mate and their reproductive optionality however they cannot act upon these rights without risking severe social consequences.

Thus, reproductive freedom exists in a structurally restricted space in India, where legally protected choice coexists with socially forbidden action. This tension represents the core challenge in understanding honour-based violence as a socio-legal phenomenon and highlights the inability of legal solutions to address long-standing systems of social regulation.

VII. LIMITS OF LEGAL PROTECTION: SOCIO-LEGAL ANALYSIS

Although India's Constitution establishes legally enforceable protections under Articles 14, 15, 19 and 21 relating to reproductive autonomy and decisional liberty, there exists a large and systemic gap between what is guaranteed and what is actually delivered. The structure of law in India operates primarily through formal institutional means, while honour-based violence occurs in informal systems of social governance. The two structures create a substantial gap in the delivery of enforcement of constitutional protections for victims of honour-based violence who reside in communities governed by strong honour norms.

At the level of formal law, the State of India has created a very extensive set of legal standards governing honour-based violence. These include: a number of Supreme Court decisions that recognize the extreme severity of honour-based crimes (for example, *Shakti Vahini v. Union of India*); judicial mandates imposing positive obligations on state authorities to protect couples from violence who exercise their constitutional rights and a focus on preventative, remedial, and punitive actions by the Courts in order to acknowledge that merely punishing those who engage in honour-related violence will not solve the problem of honour-violence. However, the extent to which these court-mandated directives have resulted in meaningful protection at the

¹⁶ S. Anandhi & K. Rajan, Honour, Violence and Social Control in Contemporary India, 58 *Econ. & Pol. Wkly.* 45 (2023).

grass roots has varied widely. Therefore, the gap between judicial articulation of legal standards and administrative implementation is also wide.

Perhaps one of the most important shortcomings of legal protections related to honour-based violence is the reactive nature of State responses. Many empirical studies related to honour killings and inter-caste violence have shown that government action typically only takes place once threatened violence escalates into actual physical harm, rather than through continuous preventative involvement.¹⁷ Even though Shakti Vahini directed states to establish early warning systems and to designate nodal officers responsible for enforcing these directives, implementation was and continues to be patchy across different locations in India, with many districts having no formalized procedures for identifying risks or protecting those at risk.

Another structural limitation on providing legal protections is the lack of institutional responsibility among law enforcement agencies. Those agencies charged with implementing protective directives issued by courts; the police often function within the same cultural environment that generates honour-based violence. Consequently, law enforcement activity too frequently is influenced by local caste dynamics and community pressure to maintain 'social peace,' rather than to actively enforce protective laws. There have been numerous recent academic studies documenting examples of how police officials have discouraged inter-caste couples from pursuing complaints about honour-related violence or failed to take timely steps to protect them because they perceive these complaints as being sensitive social issues. That type of institutional ambiguity severely limits the ability of constitutional rights to provide meaningful protection.

State actors' fear of social backlash provides additional reasons why they do not aggressively enforce protective laws. Local police officials and other administrators can expect to be pressured by powerful members of dominant caste groups and community organizations if they attempt to intervene in honour-related violence cases deemed as violations of social norms. Where caste panchayats and kinship networks remain influential in rural and semi-rural areas, State actors may elect to pursue a policy of 'cautious non-interventionism.' Such an approach would allow them to avoid creating greater conflict among local power-holders. Ultimately, this approach leads to selective enforcement of protective laws i.e., those laws are implemented based on whether the individual's autonomous behaviour is considered acceptable within the local social politics context.

¹⁷ J. Choudhury, Caste, State and Policing of Inter-Caste Couples in North India, 12 *Indian J. L. & Soc'y* 89 (2023).

Finally, even though courts have ordered governments to develop guidelines for establishing preventative mechanisms, including the use of district-level monitoring teams, rapid response units, and safehouses for endangered couples, such efforts have had limited success in practice. Enforcement of these guidelines depends almost entirely on administrative discretion i.e., the willingness and capacity of local administrators to act. Furthermore, unlike many Western countries with similar honour-based violence problems, India does not have a specific statute regulating HBV; making it difficult to achieve consistency across jurisdictions in the application of protective laws.

VIII. CONCLUSION

The study demonstrated that Honour-Based Violence (HBV) in India exists as an entrenched obstacle to women's reproductive autonomy, despite Article 14, Article 19 and Article 21 of the Indian Constitution offering strong constitutional protection. The Supreme Court has ruled that decisional autonomy in sexual/romantic relationships is a constitutionally protected right; however, the daily life experiences of individuals who engage in inter-caste and/or inter-religious relationships illustrate a significant disconnect between the recognition by the courts of their constitutional rights, and their ability to enjoy substantive reproductive freedoms.

The research also indicated that this disconnect is not simply due to inadequate implementation of existing law, but also stems from systemic issues related to caste, family/clan networks, and honour based social norms functioning as alternative systems of governance regulating women's marriage and reproductive decisions. These non-state institutions have been shown to regulate, limit and even violently enforce individual choice and consequently, formal legal remedies alone will be insufficient to address the structural bases of HBV.

Based upon this evidence, a new institutional approach is needed; one that includes both enhanced enforcement mechanisms and targeted protections for vulnerable populations (including those who are engaged in inter-caste relationships). Additionally, there needs to be a shift in socio-legal thinking toward recognizing caste as a mechanism of social control of women's reproduction, rather than seeing such violence as isolated crimes. It is only through such a dual approach that the constitutional protections offered for reproductive autonomy will become closer to reality.

This article provided a connection between the two areas of previous scholarship; reproductive autonomy within constitutional and feminist legal literature, and Honour-Based Violence within socio-legal/criminology literature. Through combining these approaches, it provided a broader

understanding of how women's reproductive rights are restricted in practice and illustrates the necessity to rethink legal protection using a structured lens.
