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Unseen Dangers: Boiling Frog Syndrome and the Escalation of Abuse in Live-in Relationships in India

NAVONITA MALLICK¹ AND SHASHWATA SAHU²

ABSTRACT

The Boiling Frog Syndrome, a metaphor for the unnoticed gradual escalation of harmful situations, aptly describes the dynamics of abuse in live-in relationships in India. As societal norms evolve and live-in relationships become more common, particularly among urban youth, the legal and social frameworks designed to protect individuals in these arrangements have not kept pace with the emerging challenges. This research explores how the Boiling Frog Syndrome manifests within the context of live-in relationships, revealing the insidious progression of abuse that often remains unnoticed until it reaches critical, life-threatening stages. The study's primary objective is to examine the gradual escalation of abuse in live-in relationships in India and analyze the socio-legal factors that influence this phenomenon. Through a doctrinal legal methodology, the research scrutinizes statutes, case law, and theoretical perspectives to uncover gaps in existing legal protections, particularly under the Protection of Women from Domestic Violence Act (PWDVA) 2005. The findings indicate that while live-in relationships are slowly gaining legal recognition, protections remain inconsistent and are hampered by vague definitions and societal stigma. Victims, especially women, are often left vulnerable to escalating abuse due to inadequate legal recourse and support systems. The study concludes with a call for urgent legal reforms that explicitly recognize live-in relationships within domestic violence laws, ensuring comprehensive protection for all individuals, regardless of marital status. It advocates for the creation of tailored support services, including crisis helplines and safe housing, alongside nationwide education campaigns to transform societal attitudes towards live-in relationships and abuse. This research contributes to the broader discourse on domestic violence in India, emphasizing the need for a holistic approach combining legal, policy, and educational strategies to ensure the safety, dignity, and justice of all individuals, irrespective of their relationship status.

Keywords: *Boiling Frog Syndrome, live-in relationships, domestic violence, legal reform, societal norms, India, abuse escalation, Protection of Women from Domestic Violence Act.*

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I. INTRODUCTION

The "Boiling Frog Syndrome" is a metaphor often used to describe a situation where gradual change goes unnoticed until it reaches a critical point, leading to potentially disastrous consequences. In a scenario where a frog is placed in tepid water, and the temperature is slowly increased, the frog fails to perceive the danger and eventually succumbs to the heat³. This metaphor is strikingly relevant to the dynamics of abuse in live-in relationships, where the escalation of abusive behaviour often occurs so gradually that the victims may not recognize the severity of their situation until it is too late⁴. The application of this syndrome to the context of live-in relationships in India is not just a theoretical exercise but a critical lens through which we can understand the silent yet significant dangers these relationships pose when legal and social factors conspire to obscure the progression of abuse.

Live-in relationships in India have undergone a significant transformation in recent years. Historically, cohabitation without marriage was largely stigmatized and considered contrary to the socio-cultural ethos of the country. However, with changing societal norms, increased urbanization, and the influence of global culture, live-in relationships have become more visible, especially among younger generations in urban areas⁵. Although live-in relationships in India are becoming more visible, their legal status remains intricate and frequently unclear. The judiciary has made significant progress in acknowledging the rights of individuals in cohabitation arrangements, with groundbreaking judgments guaranteeing protection under the Domestic Violence Act of 2005⁶. However, these relationships still operate in a grey area, where societal acceptance lags behind legal recognition, and the nuances of such relationships are often lost in public discourse. The juxtaposition of Boiling Frog Syndrome with live-in relationships in India highlights a critical research problem: the gradual escalation of abuse within these relationships, often unnoticed until it reaches a dangerous level. In live-in relationships, where the legal and social support structures are not as robust or clear-cut as those in formal marriages, the potential for abuse to go unchecked is significant. Victims may endure increasingly abusive behaviour, rationalizing or minimizing the severity of their situation due

³ The Boiling Frog Syndrome, <https://www.agappe.com/in/blog-details/the-boiling-frog-syndrome.html> (last visited Aug 29, 2024).

⁴ The Boiling Frog Syndrome: A Metaphor for Burnout | Psychology Today, <https://www.psychologytoday.com/intl/blog/lessons-from-a-burnt-out-psychologist/202406/the-boiling-frog-syndrome-a-metaphor-for-burnout> (last visited Aug 25, 2024).

⁵ Sanskar Krishnan - & Ishita Srivastava -, *Social And Cultural Implications of Live-In Relationships In India*, 6 IJFMR 20396 (2024).

⁶ Live-in Relationships in India: Perspectives from CrPC, IPC, and The Protection of Women from Domestic Violence Act 2005 Standpoints, https://www.researchgate.net/publication/381612588_Live-in_Relationships_in_India_Perspectives_from_CrPC_IPC_and_The_Protection_of_Women_from_Domestic_Violence_Act_2005_Standpoints (last visited Aug 29, 2024).

to a lack of societal recognition or legal recourse⁷. This research seeks to explore the connection between the gradual nature of Boiling Frog Syndrome and the escalation of abuse in live-in relationships, aiming to shed light on the unseen dangers that these dynamics can harbour. Two primary research questions guide this study. First, how does Boiling Frog Syndrome manifest in the context of abusive dynamics within live-in relationships in India? Understanding this will involve analyzing the patterns of behaviour that lead to the gradual escalation of abuse, often unnoticed by the victims and, in many cases, by their social circles. Second, what are the legal and social factors that influence the escalation of abuse in these relationships? Here, the focus will be on the role of societal perceptions, the legal framework surrounding live-in relationships, and the availability or lack thereof of support systems for individuals in such situations. This research seeks to gain a thorough understanding of the distinct difficulties encountered by individuals in cohabiting relationships in India, specifically in relation to the increasing occurrence of abuse. By applying the Boiling Frog Syndrome metaphor, this study seeks to bring attention to the often-overlooked dynamics that contribute to the gradual intensification of abuse, offering insights that could inform both legal reforms and social interventions designed to protect individuals in live-in relationships. The purpose of this research is to add to the overall discussion on domestic abuse in India, emphasizing the importance of using sophisticated methods that take into account the unique characteristics of non-traditional relationships in a society that is rapidly evolving.

(A) Research Objective

The objective of this paper is to find out the application of the Boiling Frog Syndrome in understanding the escalation of abuse in live-in relationships in India. By examining how gradual and often imperceptible changes in abusive behaviour can trap individuals in increasingly harmful situations, this study aims to shed light on the psychological and sociological processes that enable such dynamics. Understanding these patterns is crucial in developing strategies to identify early warning signs and prevent the progression of abuse in these relationships. A secondary objective is to explore the legal and social factors that contribute to or mitigate the escalation of abuse in live-in relationships. This involves analyzing the existing legal framework in India, particularly how it addresses or fails to address the unique challenges faced by individuals in live-in relationships. Additionally, the study will examine societal attitudes towards live-in relationships and how these attitudes influence the recognition and response to abuse within such arrangements. The research aims to advocate for reforms and

⁷ Zlatka Rakovec-Felser, *Domestic Violence and Abuse in Intimate Relationship from Public Health Perspective*, 2 HEALTH PSYCHOL RES 1821 (2014).

interventions that better safeguard individuals in these relationships by identifying gaps in legal protection and social support. The research aims to produce practical insights that can be used to shape policy development, implement legal reforms, and raise public awareness in order to prevent the increase of abuse in cohabiting relationships. By bringing attention to the often-overlooked dangers associated with the gradual intensification of abuse, this study aims to contribute to a more nuanced understanding of domestic violence in non-traditional relationship structures, ultimately promoting safer and more equitable social environments.

(B) Research Methodology

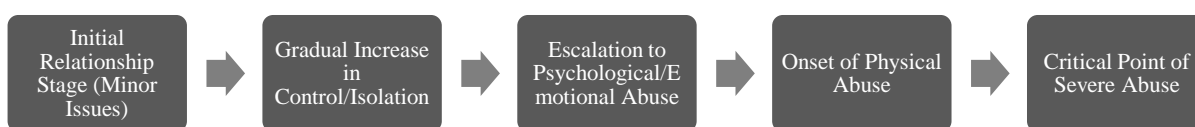
This research employs a doctrinal legal research methodology to analyze the laws, case law, and theoretical perspectives relevant to escalating abuse in live-in relationships in India. The doctrinal approach allows for a comprehensive examination of legal texts, providing a detailed understanding of how existing laws and judicial interpretations address the issues associated with live-in relationships and the application of the Boiling Frog Syndrome to abusive dynamics. Through this method, the study systematically explores the legal principles and frameworks governing live-in relationships, focusing on how they may protect or fail to protect individuals from escalating abuse. The paper focuses specifically on the legal framework within the Indian jurisdiction, with a particular emphasis on the Protection of Women from Domestic Violence Act, 2005, and relevant sections of the Indian Penal Code. The study also examines important legal precedents that have influenced the legal interpretation of cohabitation and domestic violence in India. Data sources for this study include statutes, judicial decisions, legal commentaries, and policy papers. These materials provide the foundational texts needed to evaluate the effectiveness of current legal protections critically and to identify gaps that may allow for the unnoticed escalation of abuse in live-in relationships.

II. CONCEPTUAL FRAMEWORK

The Boiling Frog Syndrome is a metaphor often used to describe situations where gradual changes go unnoticed until they culminate in a critical, often disastrous, outcome. The analogy stems from the idea that if a frog is placed in boiling water, it will immediately jump out to save itself. However, if the frog is placed in lukewarm water that is gradually heated, it will not perceive the danger until it is too late, ultimately succumbing to the boiling water⁸. This metaphor holds significant relevance in the context of abusive dynamics in live-in relationships, particularly in India, where societal and legal frameworks can obscure the gradual intensification of harm, leading to severe consequences that are often only recognized in

⁸ The Boiling Frog Syndrome, *supra* note 2.

hindsight. Live-in relationships are increasingly prevalent in contemporary India, defined as arrangements where two individuals cohabit without formal marriage. These relationships, while gaining more visibility and acceptance, often operate in a complex legal and social environment⁹. Legally, live-in relationships are recognized to some extent under Indian law, particularly in relation to domestic violence protections and property rights. However, societal acceptance still lags, and the support structures for individuals in such relationships can be inadequate¹⁰. This lack of robust institutional and societal frameworks can exacerbate the Boiling Frog Syndrome effect, where individuals may endure escalating abuse without recognizing the severity or having adequate recourse.



Flowchart 1: Gradual Escalation of Abuse in Live-in Relationships (Boiling Frog Syndrome)

The above flowchart illustrates the gradual escalation of abuse in live-in relationships, often referred to as Boiling Frog Syndrome. It begins with the Initial Relationship Stage, where minor issues may arise but are typically overlooked. Over time, there is a Gradual Increase in Control/Isolation, where one partner exerts more control, isolating the other from support systems. This leads to an Escalation to Psychological/Emotional Abuse, characterized by manipulation, threats, and verbal abuse. Eventually, this may progress to the Onset of Physical Abuse, where violence becomes more overt. The situation reaches a Critical Point of Severe Abuse, where the victim's safety is severely compromised. This flowchart highlights the insidious nature of abuse in live-in relationships, where the gradual increase in severity often goes unnoticed until it becomes life-threatening.

In the context of live-in relationships in India, the Boiling Frog Syndrome metaphor highlights how the slow, almost imperceptible escalation of abusive behaviour can trap individuals in harmful situations without their immediate realization. Live-in relationships, while increasingly recognized by Indian courts, operate in a social and legal gray area where the rights and protections afforded to individuals are not always clear-cut. This ambiguity can allow for abusive behaviour to persist and escalate unnoticed, as victims may not perceive the gradual

⁹ glcmag, *Beyond Limbo: Live-In Relationships in India – The Magazine Committee of Government Law College, Mumbai*, <https://glcmag.com/2024/06/26/1515/> (last visited Aug 30, 2024).

¹⁰ RESEARCH REPORT Centre for Socio Legal Research Live-in Relationships In India, <https://hcommons.org/deposits/objects/hc:45416/datastreams/CONTENT/content> (last visited Aug 30, 2024).

increase in severity until the situation becomes critically dangerous¹¹. The legal standing of cohabitation in India has changed over time, with the courts gradually acknowledging the entitlements of individuals in such relationships, especially under the Protection of Women from Domestic Violence Act of 2005. This legislation provides legal protection to women in cohabiting relationships, acknowledging their entitlement to pursue legal action against domestic violence, encompassing physical, emotional, and financial mistreatment¹². Despite these legal provisions, live-in relationships are still viewed with a degree of societal scepticism and moral judgment, which can discourage victims from seeking help or reporting abuse. The lack of clear legal definitions and societal acceptance means that individuals in live-in relationships may find themselves in a precarious position where the gradual escalation of abuse goes unchallenged until it reaches a tragic end.

The dynamics of abuse in live-in relationships often mirror the Boiling Frog Syndrome. Abusers typically do not start with extreme violence; instead, they gradually exert control and inflict harm, making it difficult for the victim to recognize the danger early on. This pattern is evident in several high-profile cases in India, such as the tragic murder of Shraddha Walkar by her live-in partner Aaftab Poonawala in May 2022. In this case, Poonawala strangled Walkar, dismembered her body into 35 pieces, and stored them in a refrigerator before disposing of them in the forests of Delhi and Gurugram. This heinous act was the culmination of a relationship marked by increasing control and violence, a situation that Walkar may not have initially recognized as life-threatening¹³. The gradual escalation of abusive behaviour, in this case, is a stark reminder of how the Boiling Frog Syndrome operates in real-life situations. Similar patterns can be observed in other cases, such as the murder of Sarthak Das by his live-in partner Sanhati Paul in Kolkata and the killing of a live-in partner by Vipul Tailor in Delhi, who had a history of involvement in other criminal cases¹⁴. These cases illustrate how the slow build-up of tension and control in live-in relationships can lead to extreme violence, often catching the victim off-guard as they fail to perceive the danger until it is too late. The legal and societal frameworks surrounding live-in relationships in India may inadvertently contribute to this phenomenon by not providing sufficient support or recognition to individuals in these

¹¹ How legal are live-in relationships in India? | In Focus podcast - The Hindu, <https://www.thehindu.com/podcast/how-legal-are-live-in-relationships-in-india-in-focus-podcast/article67115570.ece> (last visited Aug 30, 2024).

¹² Ishika Jain, *LIVE-IN RELATIONSHIPS, SOCIAL CHANGE AND INDIAN JUDICIARY*, 6.

¹³ Samridhi Tewari, 'Aftab Cut Shraddha's Body into 17 Pieces, Kept Shifting It between Fridge and Kitchen Cabinets,' THE HINDU, Feb. 7, 2023, <https://www.thehindu.com/news/cities/Delhi/aftab-cut-shraddhas-body-into-17-pieces-kept-shifting-it-between-fridge-and-kitchen-cabinets/article66483093.ece> (last visited Aug 30, 2024).

¹⁴ Woman Stabs Live-in Partner to Death in Kolkata, Arrested: Police | Kolkata News - Times of India, <https://timesofindia.indiatimes.com/city/kolkata/woman-stabs-live-in-partner-to-death-in-kolkata-arrested-police/articleshow/108089377.cms> (last visited Aug 29, 2024).

arrangements. The gradual escalation of abuse, as seen in the Boiling Frog Syndrome, underscores the need for greater legal clarity and societal support for individuals in live-in relationships¹⁵. It is crucial to recognize that the early stages of abuse may not always appear threatening, but without intervention, they can lead to devastating outcomes. Legal reforms that provide clear definitions, rights, and protections for individuals in live-in relationships, combined with public awareness campaigns that destigmatize these relationships, are essential in preventing the unnoticed escalation of abuse. By understanding the Boiling Frog Syndrome in this context, we can better address the unique challenges faced by those in live-in relationships, ensuring that the warning signs of abuse are recognized and acted upon before it is too late.

III. LEGAL PROTECTIONS AND GAPS

The legal framework regarding live-in relationships in India is still developing. Although the judiciary has acknowledged the rights of individuals in these relationships, there are still significant gaps that can worsen the increase of abuse. The Protection of Women from Domestic Violence Act, 2005 (PWDVA), provides some legal protections for women in live-in relationships by including them under the definition of "domestic relationships"¹⁶. However, the application of this act is limited by the ambiguity surrounding the criteria for recognizing a live-in relationship, often leading to inconsistencies in legal recourse. For instance, the Supreme Court in *Indra Sarma v. V.K.V. Sarma* (2013)¹⁷ clarified that not all live-in relationships would qualify for protection under the PWDVA. The Court identified factors such as the duration of the relationship, shared household, and the presence of a sexual relationship akin to marriage as determinants of whether a live-in relationship can be considered a "domestic relationship" under the Act. This ruling highlights a significant gap, as relationships that do not meet these criteria may leave individuals vulnerable to abuse without adequate legal protection¹⁸. Moreover, there is a lack of specific legal provisions addressing the unique challenges faced by individuals in live-in relationships. The existing framework tends to focus on marital relationships, with little consideration for the dynamics of non-marital cohabitation. This oversight can lead to a lack of recognition of the subtle and gradual nature of abuse in live-in relationships, often referred to as the "boiling frog syndrome," where the escalation of abuse

¹⁵ Sandeep Kumar Sharma & Narendra Bahadur Singh, *Legal Recognition and Rights of Live-in Partnerships: A Judicial Perspective in India*.

¹⁶ Research Scholar, Symbiosis International University (SIU), PUNE, MAHARASHTRA (INDIA) & Sonali Abhang, *Judicial Approach to Live- In-Relationship" In India- Its Impact on Other Related Statutes*, 19 IOSRJHSS 28 (2014).

¹⁷ 2013 AIR SCW 6783, 2013 (15) SCC 755, 2014 (1) AIR BOM R 615, (2014) 1 MARRILJ 420

¹⁸ *Indra Sarma vs V.K.V.Sarma* on 26 November, 2013, (2013).

occurs so gradually that it may go unnoticed until it reaches a critical point.

Judicial decisions play a crucial role in shaping the legal protections available for individuals in live-in relationships. The Indian judiciary has increasingly recognized the need to protect women in these relationships, as evidenced by landmark cases such as *D. Velusamy v. D. Patchaiammal* (2010)¹⁹. In this case, the Supreme Court expanded the interpretation of "domestic relationship" under the PWDVA to include relationships "in the nature of marriage." The Court laid down criteria such as the couple's intention to live together as spouses, their social reputation, and whether they have children to determine whether a relationship qualifies for legal protection. However, despite these progressive rulings, the legal remedies available to individuals in live-in relationships often fall short. The gradual escalation of abuse, a hallmark of many live-in relationships, is not adequately addressed by current legal frameworks²⁰. For example, in *Indra Sarma v. V.K.V. Sarma*, the Court recognized the vulnerability of women in live-in relationships but also emphasized the need to distinguish between relationships that qualify for protection and those that do not. This distinction can result in victims being left without recourse, especially in cases where the relationship does not meet the traditional markers of cohabitation or financial dependence. The limitations of current legal remedies are further illustrated by the lack of specific provisions addressing psychological abuse and coercive control, which are often prevalent in live-in relationships. While the PWDVA provides protection against physical abuse, its application to non-physical forms of abuse is less clear, leaving victims of emotional or psychological abuse with limited options for legal redress²¹.

The legal challenges faced by individuals in live-in relationships are compounded by social and cultural factors that influence the handling of abuse cases. In India, live-in relationships are still often viewed with suspicion and stigma, which can affect the willingness of individuals to seek legal protection. Societal norms that prioritize marriage as the ideal form of relationship may lead to a lack of empathy or understanding for those in live-in relationships, resulting in judicial and law enforcement biases²². Cultural attitudes towards gender roles also play a significant role in the legal handling of abuse in live-in relationships. Traditional views that see women as dependent on men can undermine the recognition of women's autonomy in live-in relationships, leading to legal decisions that prioritize reconciliation over protection. This cultural backdrop can create an environment where the escalation of abuse is either ignored or minimized, with the legal system failing to provide adequate support to victims. Furthermore, the lack of social

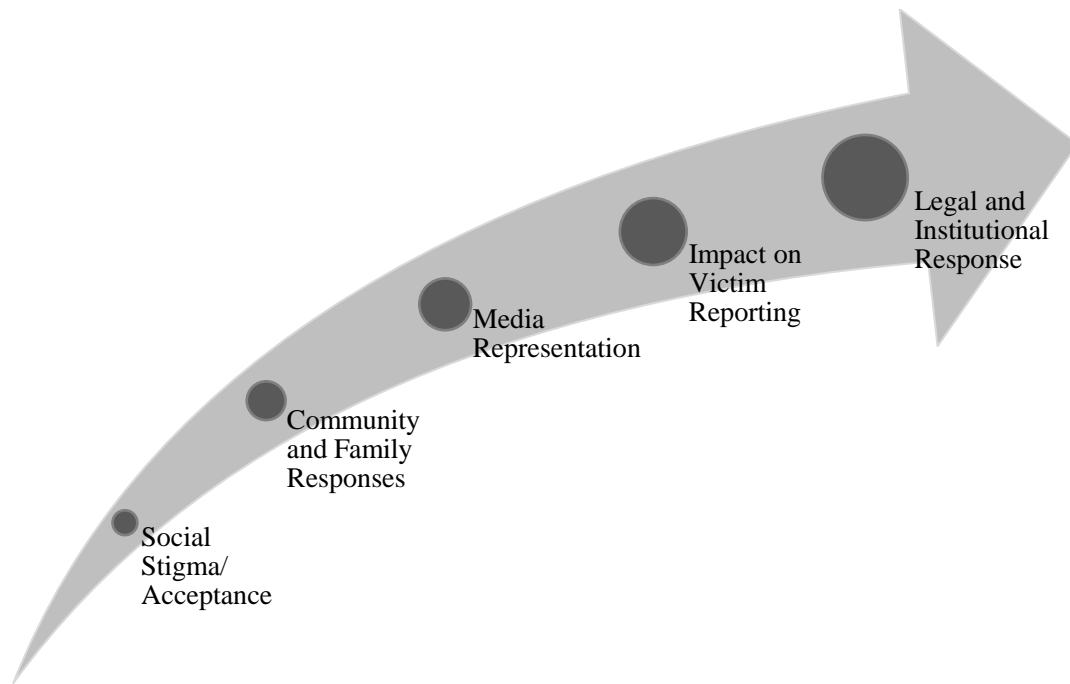
¹⁹ Markandey Katju, *D. Patchaiammal .. Respondent*.

²⁰ Kashish Gupta, *Case Comment : D. VELUSAMY v. D. PATCHAIAMMAL*,.

²¹ Indra Sarma & V K V Sarma, *INDIAN JOURNAL OF LAW, POLITY AND ADMINISTRATION*.

²² Shraddha Suman Sahu, *LIVE IN RELATIONSHIP IN INDIA: A SOCIO – LEGAL STUDY*.

acceptance of live-in relationships can discourage individuals from coming forward with complaints of abuse. Fear of social ostracism, coupled with the potential for legal proceedings to expose the private details of the relationship, may deter victims from seeking help²³. This hesitation is particularly pronounced in conservative communities where live-in relationships are considered morally unacceptable, leading to a reluctance to acknowledge or address the abuse that occurs within them.



Flowchart 2: Societal Responses to Live-in Relationships and Abuse

This flowchart outlines the interplay between societal attitudes and the legal response to abuse in live-in relationships. It begins with Social Stigma/Acceptance, where societal views either stigmatize or accept live-in relationships. This influences Community and Family Responses, shaping how victims are supported or isolated. Media Representation then plays a role in framing these relationships, impacting public perception. These factors collectively affect the Impact on Victim Reporting, determining whether victims feel empowered or discouraged from seeking help. Finally, the Legal and Institutional Response reflects how effectively the legal system addresses abuse, influenced by the societal context. This flowchart also highlights how social factors directly impact the effectiveness of legal protections. The legal framework in India provides some level of protection for individuals in live-in relationships, but significant gaps remain that can contribute to the escalation of abuse. Judicial decisions have gradually expanded the scope of legal protections, but the limitations of current legal remedies,

²³ Günnur Karakurt & Kristin E. Silver, *Emotional Abuse in Intimate Relationships: The Role of Gender and Age*, 28 VIOLENCE VICT 804 (2013).

particularly in addressing the gradual nature of abuse, continue to pose challenges²⁴. Social and cultural factors further complicate the legal handling of abuse in live-in relationships, underscoring the need for a more nuanced and comprehensive approach to legal protection. In order to address these problems, it is necessary to implement both legal changes and a change in societal perspectives towards cohabitation, acknowledging it as a valid form of partnership that should be granted the same rights and safeguards as marriage.

IV. CASE COMPARATIVE ANALYSIS: INDIA VS. OTHER JURISDICTIONS

In examining the phenomenon of Boiling Frog Syndrome and the escalation of abuse in live-in relationships, it's crucial to place the Indian context within a broader global perspective. Comparative analysis with other jurisdictions reveals both similarities and distinct differences in how legal systems address the gradual escalation of abuse in non-marital intimate relationships. In India, the legal recognition of live-in relationships has been shaped by a series of landmark Supreme Court judgments, but significant gaps remain. These gaps, particularly in addressing the gradual escalation of abuse, highlight the challenges faced by victims in seeking protection under current legal frameworks. For instance, the Indian legal system lacks specific provisions that recognize the unique dynamics of live-in relationships, often relying on the broader Domestic Violence Act, which was initially designed for marital relationships²⁵.

Comparatively, in countries like the United States, the legal system provides more comprehensive protections for individuals in non-marital relationships. Laws in many U.S. states allow for protective orders that can be applied to dating relationships, recognizing the potential for abuse outside the confines of marriage. This broader approach ensures that victims in live-in relationships have access to legal remedies without the need to prove a "marriage-like" relationship, which is often a barrier in India. In the United Kingdom, recent reforms to the Domestic Violence Act have expanded protections to include "controlling or coercive behavior" in intimate relationships, recognizing the psychological aspects of abuse that are often prevalent in live-in relationships²⁶. This is a significant step forward, as it acknowledges the insidious nature of abuse that can occur gradually, much like the Boiling Frog Syndrome. The UK's legal framework, thus, provides a more nuanced understanding of abuse in live-in relationships compared to India, where the focus remains largely on physical violence. Data

²⁴ Himangshu Rathee, *LEGAL FRAMEWORK FOR INTIMATE PARTNER VIOLENCE IN INDIA: REIMAGINING THE INDIAN LAW*, 11 (2023).

²⁵ Cintya Lanchimba, Juan Pablo Díaz-Sánchez & Franklin Velasco, *Exploring Factors Influencing Domestic Violence: A Comprehensive Study on Intrafamily Dynamics*, 14 FRONT PSYCHIATRY 1243558 (2023).

²⁶ Manupatra, *India v USA: Legality of Live-in Relationships*, <https://articles.manupatra.com/article-details?id=undefined&ifile=undefined> (last visited Aug 30, 2024).

from the WHO multi-country study on violence against women further underscores the global prevalence of intimate partner violence, including in non-marital relationships²⁷. The study, which included countries from diverse cultural and socio-economic backgrounds, found that 13-61% of women reported experiencing physical violence from a partner at some point in their lives²⁸. This wide range highlights the variability in how different legal systems respond to intimate partner violence and the need for more robust protections for victims in live-in relationships.

In contrast to India, countries like Brazil and South Africa have also made significant strides in addressing violence in live-in relationships through specific legal provisions and strong enforcement mechanisms. Brazil's Maria da Penha Law, for instance, provides comprehensive measures to prevent domestic violence and protect victims, including those in live-in relationships²⁹. Similarly, South Africa's Domestic Violence Act offers broad protections against various forms of abuse, including emotional and psychological harm, recognizing the full spectrum of abusive behaviour. The comparative analysis reveals that while India has made progress in recognizing live-in relationships within its legal framework, there is still a significant gap in providing comprehensive protection against the gradual escalation of abuse³⁰. Learning from other jurisdictions, particularly in recognizing and addressing psychological abuse and coercive control, could enhance India's legal response to this complex issue, ensuring better protection for victims of live-in relationships.

V. CHALLENGES AND IMPLICATIONS

Addressing abuse within live-in relationships presents a unique set of challenges, particularly due to the phenomenon of Boiling Frog Syndrome, where abuse escalates gradually and is often normalized over time. This gradual escalation can desensitize victims to the abuse, making it difficult for them to recognize the severity of their situation and seek help. One of the primary challenges in addressing abuse in live-in relationships is the societal and legal recognition of these relationships. In India, while the judiciary has acknowledged live-in relationships through various rulings, there remains a significant lack of specific legal frameworks that cater to the

²⁷ Vijaykumar Harbishettar & Suresh Bada Math, *Violence against Women in India: Comprehensive Care for Survivors*, 140 INDIAN J MED RES 157 (2014).

²⁸ Understanding and addressing violence against women, https://iris.who.int/bitstream/handle/10665/77432/WHO_RHR_12.36_eng.pdf.

²⁹ Virgínia Cordeiro Amorim, Emmanuel Zagury Tourinho & Traci M. Cihon, *Brazilian Public Policies for Assistance to Women in Situations of Violence: Contributions from Culturo-Behavioral Science*, 31 BEHAV. SOC. ISS. 23 (2022).

³⁰ Sabelinah Tshoane et al., *Domestic Violence against Men: Unmuting the Reality of the Forgotten Gender*, 10 COGENT SOCIAL SCIENCES 2304990 (2024).

nuances of these relationships, particularly in the context of abuse. The gradual normalization of abuse in live-in relationships is exacerbated by social and cultural factors³¹. In many cases, societal stigma attached to non-marital relationships can discourage victims from seeking legal protection or speaking out about their experiences. The lack of social acceptance can also lead to isolation, making it harder for victims to access support systems³². Furthermore, cultural norms that prioritize marriage as the only legitimate form of intimate partnership contribute to the marginalization of individuals in live-in relationships, often leaving them without adequate legal or social support.

The implications for legal reform, policy development, and judicial practices are profound. Legal reform is urgently required to explicitly acknowledge cohabiting relationships within the framework of domestic violence legislation. Although the Protection of Women from Domestic Violence Act (PWDVA) in India does provide certain safeguards for women in live-in relationships, the requirements for being recognized as a "domestic relationship" can be limiting, resulting in a lack of protection for numerous victims. Legal reforms should aim to broaden the definition of domestic relationships to include all forms of cohabitation without requiring proof of a marriage-like relationship³³. This would ensure that victims of abuse in live-in relationships have access to the same legal remedies available to those in marital relationships. Policy development must also focus on addressing the specific needs of victims in live-in relationships. This includes the creation of targeted awareness campaigns that educate the public about the risks of abuse in live-in relationships and the availability of legal protections³⁴. Additionally, policies should be developed to provide comprehensive support services for victims, including access to shelters, counselling, and legal aid. These services should be made available without the need for victims to prove the legitimacy of their relationship, which can be a significant barrier to accessing help.

Judicial practices also need to evolve to better protect victims of abuse in live-in relationships. Courts should be sensitized to the unique challenges faced by these victims, particularly the gradual and insidious nature of the abuse they may endure. Judges should be trained to recognize the signs of Boiling Frog Syndrome and to take it into account when assessing cases

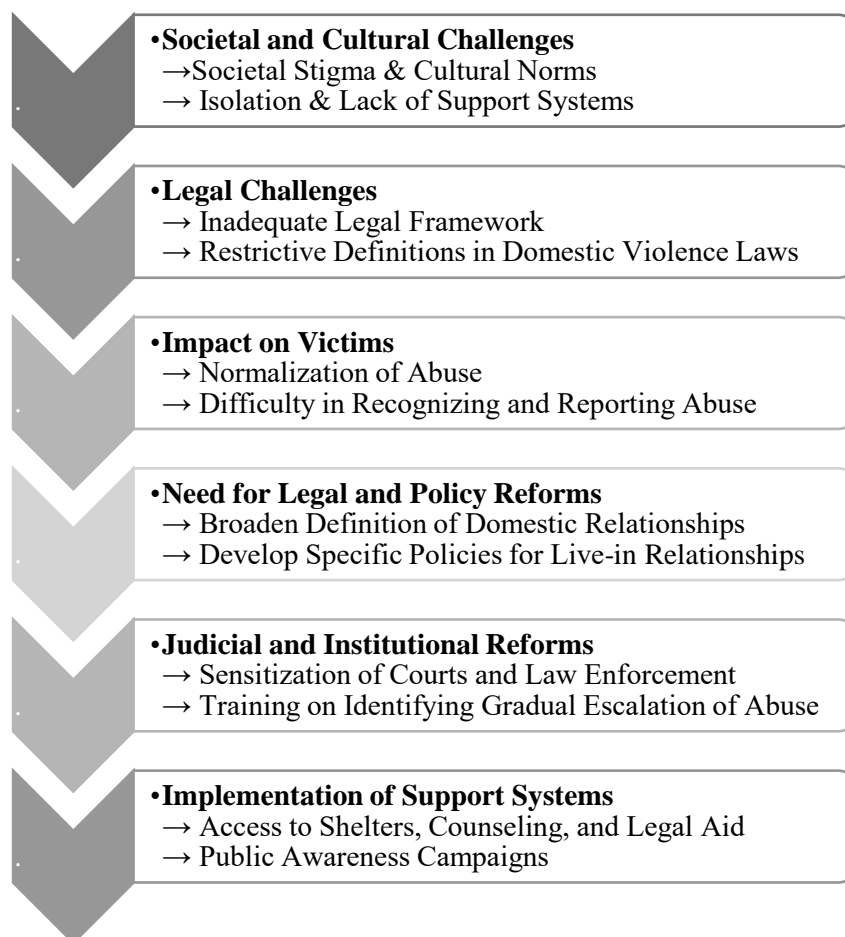
³¹ Sharma and Singh, *supra* note 13.

³² Joanne Hulley et al., *Intimate Partner Violence and Barriers to Help-Seeking Among Black, Asian, Minority Ethnic and Immigrant Women: A Qualitative Metasynthesis of Global Research*, 24 TRAUMA VIOLENCE ABUSE 1001 (2023).

³³ Nandita Banerjee Dhawan & Harshita Bhasin, *Combating Domestic Violence in West Bengal, India: Gendered Norms and Legal Regulations*, 7 INTERNATIONAL JOURNAL OF EDUCATIONAL RESEARCH OPEN 100352 (2024).

³⁴ Ravneet Kaur & Suneela Garg, *Addressing Domestic Violence Against Women: An Unfinished Agenda*, 33 INDIAN J COMMUNITY MED 73 (2008).

of domestic violence in live-in relationships. This includes understanding that the absence of physical violence does not mean the absence of abuse, as emotional and psychological abuse can be just as damaging and are often more difficult to detect³⁵. To improve legal protections and societal support systems for victims of abuse in live-in relationships, several recommendations can be made. First, there should be a concerted effort to reform and expand existing domestic violence laws to cover all forms of intimate relationships, including live-in partnerships. Second, public awareness campaigns should be launched to challenge the stigma surrounding live-in relationships and to educate people about the signs of gradual abuse. Third, support services for victims should be made more accessible and should not be contingent on the legal status of the relationship³⁶. Finally, there should be ongoing training for law enforcement, judiciary, and social workers to ensure they are equipped to handle cases of abuse in live-in relationships with the sensitivity and understanding they require.



Flowchart 3: Addressing Challenges and Implications of Abuse in Live-in Relationships

This flowchart highlights the multifaceted challenges and implications of abuse in live-in

³⁵ Domestic Violence & The Courtroom: Knowing The Issues, Understanding The Victim, DOMESTIC VIOLENCE.

³⁶ Sandeep Giri & Shaila Parveen, *Intimate Partner Violence in India: Patterns, Causes and Way Forward*, 12 INT. J. SCI. RES. ARCH. 837 (2024).

relationships. It begins by addressing societal and cultural obstacles, including stigma and isolation, followed by legal issues, such as inadequate frameworks and restrictive definitions. These factors contribute to the normalization and underreporting of abuse. The flowchart then advocates for broadening legal definitions and creating specific policies alongside judicial and institutional reforms, such as sensitizing courts and improving training. Finally, it emphasizes the importance of implementing support systems, including shelters and public awareness campaigns, to provide comprehensive assistance and address the issue holistically. While progress has been made in recognizing live-in relationships within the Indian legal framework, much more needs to be done to address the specific challenges faced by victims of abuse in these relationships. Legal reforms, policy development, and changes in judicial practices are essential to providing comprehensive protection and support for these victims³⁷. By addressing these challenges, we can ensure that victims of abuse in live-in relationships are not left behind in the fight against domestic violence.

VI. CONCLUSION AND FUTURE DIRECTIVES FOR INDIA

Boiling Frog Syndrome in India's context of live-in relationships underscores a pressing and often overlooked social issue. The gradual escalation of abuse, characterized by subtle and incremental increases in abusive behaviour, poses significant challenges for victims in recognizing and responding to their deteriorating circumstances. This insidious form of abuse not only inflicts profound physical and psychological harm but also thrives within societal and legal frameworks that are ill-equipped to address the unique dynamics of non-marital cohabitation. Throughout this research, it has become evident that live-in relationships in India exist within a complex interplay of evolving social norms, legal ambiguities, and deeply entrenched cultural attitudes³⁸. While there has been a gradual shift towards accepting such relationships, the accompanying legal and institutional support systems have not evolved significantly. This disparity leaves individuals, particularly women, vulnerable to sustained and escalating abuse without adequate avenues for redress or protection.

The current legal provisions, including the Protection of Women from Domestic Violence Act (PWDVA) 2005, provide some recognition and protection for individuals in live-in relationships. However, applying these laws is often inconsistent and limited by narrow interpretations that fail to capture the nuanced realities of abuse within these partnerships³⁹. The

³⁷ Indian Journal of Psychiatry, https://journals.lww.com/indianjpsychiatry/fulltext/2022/03001/domestic_violence_current_legal_status_17.aspx (last visited Aug 30, 2024).

³⁸ Martin R. Huecker et al., *Domestic Violence*, in STATPEARLS (2024), <http://www.ncbi.nlm.nih.gov/books/NBK499891/> (last visited Aug 30, 2024).

³⁹ Of 'Keeps' and 'Concubines': Rights of Cohabitees under Domestic Violence Act | Conflict in the Shared

lack of clear definitions and comprehensive guidelines contributes to judicial uncertainty and inconsistent enforcement, undermining the effectiveness of legal remedies available to victims. Moreover, societal stigma and lack of awareness further exacerbate the challenges faced by victims. Cultural norms that prioritize marital relationships and stigmatize non-traditional forms of cohabitation often deter victims from seeking help⁴⁰. At the same time, inadequate public understanding of the signs and progression of abuse hampers early intervention and support. This situation is compounded by limited access to support services tailored to the needs of individuals in live-in relationships, including counselling, legal aid, and safe shelters.

ASPECT	CURRENT GAPS	PROPOSED SOLUTIONS
Legal Framework	Limited recognition of live-in relationships in domestic violence laws.	Explicit recognition of live-in relationships within domestic violence laws.
Judicial Interpretation	Inconsistent application of laws due to vague definitions.	Incorporate clear definitions of domestic relationships and abuse in legislation.
Support Services	Lack of tailored support services for live-in relationships.	Development of comprehensive support services, including crisis helplines, legal aid, and safe shelters.
Law Enforcement Sensitivity	Inadequate training on the unique dynamics of live-in relationships.	Mandatory training programs for law enforcement and judicial personnel.
Societal Awareness	Social stigma and lack of awareness regarding abuse in live-in relationships.	Nationwide public education campaigns and early educational interventions on healthy relationships.
Research and Data Collection	Insufficient data on the nature and extent of abuse in live-in relationships.	Systematic data collection and interdisciplinary research initiatives.

Household: Domestic Violence and the Law in India | Oxford Academic, <https://academic.oup.com/book/35181/chapter-abstract/299500376?redirectedFrom=fulltext> (last visited Aug 31, 2024).

⁴⁰ Handbook for the Judiciary on Effective Criminal Justice Responses to Gender-Based Violence Against Women and Girls.

Table: Summary of Legal and Policy Gaps with Proposed Solutions

Given these challenges, it is crucial to implement comprehensive and proactive strategies to tackle the increasing prevalence of abuse in cohabiting relationships in India. Future directives should encompass comprehensive legal reforms, targeted policy initiatives, and widespread societal education aimed at fostering a supportive and responsive environment for victims. It is imperative to strengthen and clarify the legal framework governing live-in relationships. This can be achieved by explicitly recognizing live-in partnerships within domestic violence laws, ensuring that protections are unequivocally extended to individuals regardless of their marital status. Clear and inclusive definitions of domestic relationships and abuse should be incorporated into legislation to guide consistent judicial interpretation and enforcement⁴¹. Additionally, establishing specialized legal mechanisms and fast-track courts to handle cases arising from live-in relationships can enhance the efficiency and sensitivity of legal proceedings. Policy initiatives should focus on creating robust support systems for victims of abuse in live-in relationships. This includes developing accessible and comprehensive support services such as crisis helplines, counselling centres, legal aid clinics, and safe housing options⁴². Policies should also mandate training for law enforcement and judicial personnel to sensitize them to the specific dynamics and challenges associated with abuse in live-in relationships, promoting victim-centred and empathetic responses.

Addressing the root causes and social acceptance of abuse requires concerted efforts in education and public awareness. Nationwide campaigns should be launched to educate the public about the signs, consequences, and unacceptability of abuse in all forms of relationships. Educational curricula should incorporate discussions on healthy relationships, consent, and gender equality from an early age to challenge and transform prevailing societal attitudes. Engaging community leaders, media, and civil society organizations in these efforts can amplify their reach and impact⁴³. Ongoing research is essential to understand the evolving nature of live-in relationships and the patterns of abuse within them. Systematic data collection and analysis will inform evidence-based policymaking and enable the monitoring and evaluation of

⁴¹ WORLD HEALTH ORGANIZATION, RESPONDING TO INTIMATE PARTNER VIOLENCE AND SEXUAL VIOLENCE AGAINST WOMEN: WHO CLINICAL AND POLICY GUIDELINES (2013), <https://iris.who.int/handle/10665/85240> (last visited Aug 30, 2024).

⁴² live in relation domestic violence: Women in live-in relationships can also file domestic violence cases: High Court - The Economic Times, <https://economictimes.indiatimes.com/news/india/women-in-live-in-relationships-can-also-file-domestic-violence-cases-high-court/articleshow/102772442.cms?from=mdr> (last visited Aug 30, 2024).

⁴³ Lourdes Villardón-Gallego et al., *Early Educational Interventions to Prevent Gender-Based Violence: A Systematic Review*, 11 HEALTHCARE (BASEL) 142 (2023).

interventions⁴⁴. Collaborations between academic institutions, government agencies, and non-governmental organizations can facilitate comprehensive and interdisciplinary research initiatives. The unseen dangers of Boiling Frog Syndrome in live-in relationships necessitate a holistic approach combining legal, policy, and educational strategies. By acknowledging and confronting the unique challenges posed by the gradual escalation of abuse, India can take significant strides towards ensuring safety, dignity, and justice for all individuals, irrespective of their relationship status. Empowering victims through robust legal protections, supportive policies, and informed societal attitudes will mitigate current abuses and contribute to the broader goal of fostering equitable and respectful interpersonal relationships across society.

⁴⁴ Annie Bunce et al., *Challenges of Using Specialist Domestic and Sexual Violence and Abuse Service Data to Inform Policy and Practice on Violence Reduction in the UK* (2024), <https://bristoluniversitypressdigital.com/view/journals/jgbv/aop/article-10.1332-23986808Y2024D000000024/article-10.1332-23986808Y2024D000000024.xml> (last visited Aug 30, 2024).