

MURDER IN RELATIONSHIP OR MARRIAGE; WHY SHOULD NOT BE A SEPARATE LAW?

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ABSTRACT

The most severe form of intimate partner violence (IPV) is known as intimate partner homicide (IPH), sometimes known as domestic murder. This kind of violence is becoming more seen as a huge concern in India, despite the fact that it is not widely acknowledged. There have been recent high-profile incidents that have brought to light the potentially fatal confluence of cultural traditions, psychological vulnerabilities, and economical constraints inside intimate settings. These cases have been magnified by electronic media and social platforms that are available around the clock. Dowry conflicts, the shame associated with infertility, caste hierarchies, accusations of adultery, and financial hardship are among the fundamental underlying causes that often create conditions in which coercive control, humiliation, and dominance end in lethal violence. Despite the fact that legal frameworks such as the Bharatiya Nyaya Sanhita provide some degree of protection, the efficiency of these frameworks continues to be made more difficult by concerns around abuse and delayed justice. As opposed to being the result of an outburst of rage, the killing of an intimate partner in India is more of a predicted consequence of institutional failures and deeply ingrained cultural inconsistencies. As a result of the complexity and delays that are inherent in the existing divorce rules, people are often trapped in unhealthy relationships, which further increases the likelihood of fatal results. Reimagining marriage as a consensual contract, simplifying access to no-fault divorce, improving survivor-centered legal and social assistance, and cultivating a cultural tolerance of human fragility are all necessary steps in the prevention of violence of this kind. The only way for India to have any chance of reducing the number of killings committed by intimate partners and transforming homes from potential battlegrounds into safe sanctuaries is for the country to overcome these structural and legal hurdles.

Keywords: Intimate Partner Homicide, Domestic Violence, Marriage, Criminal Law, Matricide, Femicide

1. Introduction

Every few weeks, India is shaken by news of another grotesque domestic homicide. A wife strangled, chopped, and dumped in Hyderabad; a husband allegedly poisoned or dismembered by his partner in Meerut or Indore; a dowry related killing in Noida. The details vary, but the underlying truth is the same; intimate relationships, meant to be an affectionate base, are increasingly turning into avenues of lethal violence. While it may be tempting to frame intimate partner homicide as a recent surge in crime, its roots run deep within the fabric of Indian society. What has changed is the frequency of their reporting, the intensity of their coverage, and the disturbing creativity with which methods are described. Social media and 24x7 news channels ensure that every gory detail circulates widely, creating both awareness and ‘a risk of imitation’.¹

Beneath these headlines lies a complex interplay of cultural, psychological, and economic forces that shape intimate partner violence in India. Sociologists point to the deep-rooted sanctity attached to marriage, which is often viewed as a lifelong, unbreakable bond. Divorce remains heavily stigmatized, ‘no-fault’ separations are rare with the legal proceeding sometimes taking a lifetime, and families frequently pressure individuals; especially women, to remain in ‘toxic’ unions. Forensic psychologists emphasize that intimate partner homicides are seldom impulsive; they typically represent the final, fatal stage of prolonged abuse marked by coercive control, humiliation, jealousy, and domination. Global research consistently shows that the most dangerous moment for a victim is when they attempt to leave.²

In the Indian context, intimate partner violence is shaped not only by interpersonal dynamics but also by culturally specific triggers. These include dowry-related disputes, intrafamily dynamics, infertility stigma, property issues, financial distress, suspicions of infidelity, forced marriages, familial rejection of love marriages, and substance abuse. Compounding these issues is the deeply entrenched notion of family honour, which, when intertwined with rigid social expectations and caste hierarchies, often turns marriage into a transactional institution.

¹ Verma S. Abuse, denial, death: What’s behind the surge in killings of husbands in India? Experts reveal missed sign. Times of India. 2025. Available from: <https://timesofindia.indiatimes.com/india/abuse-denial-deathwhats-behind-the-surge-in-killings-of-husbands-in-india-expertsreveal-missed-signs/articleshow/121472635.cms>

² Dubey V. From Shraddha Walkar to Saurabh Rajput: Why Indian couples are killing each other. Times of India. 2025. Available from: <https://timesofindia.indiatimes.com/india/from-shraddha-walkarto-saurabh-rajput-why-indian-couples-are-killing-eachother/articleshow/120516356.cms>

In such settings, dowry demands, and financial extortion are rationalized as tools for economic stabilization and social conformity.³

Together, these forces create a combustible environment where emotional despair, cultural shame, caste-based prejudice, and economic pressure collide; sometimes leading to self-harm, and at other times erupting into fatal violence against a partner. In some Indian arranged marriages, conflicts fuelled by hierarchical expectations, interference from both mothers-in-law and mothers of the bride, and pressures on sons-in-law can escalate into emotional or physical violence, deeply straining familial and marital relationships.⁴

These patterns find empirical support in national data. The National Family Health Survey (NFHS-5) recorded that 29.3 per cent of ever-married women aged 18 to 49 had experienced spousal violence, only a marginal decline from the 31.2 per cent reported in the previous survey round.⁵ Perhaps more troubling, the same survey found that 77 per cent of women who had experienced such violence had never sought help or disclosed it to anyone, a silence that allows abusive patterns to escalate largely unchecked.⁶

Murders that occur between non-relatives are different from murders that occur within marriages or personal relationships. As long as the victim has access to the perpetrator, the perpetrator can capitalize on the trust that has been established over the years, and enjoy emotional control. Often such deaths are preceded by multiple occasions of abuse, which go unreported due to fear that other people or the system will judge them, earn a living from the abuser, or face retaliation.

2. Understanding Intimate Partner Homicide

Intimate partner violence (IPV) is abuse or aggression that occurs in a romantic relationship. Intimate partner refers to both current and former spouses and dating partners.

³ Helfgott JB. Criminal behavior and the copycat effect: Literature review and theoretical framework for empirical investigation. *Aggress Violent Behav.* 2015;22:46–64. doi.org/10.1016/j.avb.2015.02.002

⁴ Bihani D, Radhakrishnan V. Dowry deaths in India: Long investigations, rare convictions. *The Hindu*. 2025. Available from: <https://www.thehindu.com/data/dowry-deaths-in-india-longinvestigations-rare-convictions/article69814491.ece>

⁵ International Institute for Population Sciences and Ministry of Health and Family Welfare, National Family Health Survey (NFHS-5) India 2019–21 (IIPS 2021).

⁶ Hercircle.in, '77% Women Remain Silent About Domestic Violence, Reveals NFHS5 Data' (Hercircle.in, 2022) <<https://www.hercircle.in/engage/get-inspired/trending/77-womenremain-silent-about-domestic-violence-reveals-nfhs-5-data-2747>> accessed 28 July 2026.

IPV can vary in how often it happens and how severe it is. It can range from one episode of violence to chronic and severe episodes over multiple years.

IPV can include any of the following types of behavior:

- **Physical violence** is when a person hurts or tries to hurt a partner by using physical force.
- **Sexual violence** is forcing or attempting to force a partner to take part in a sex act, sexual touching, or a non-physical sexual event (e.g., sexting) when the partner does not or cannot consent.
- **Stalking** is a pattern of repeated, unwanted attention and contact by a partner that causes fear or concern for one's own safety or the safety of someone close to the victim.
- **Psychological aggression** is the use of verbal and non-verbal communication with the intent to harm a partner mentally or emotionally or to exert control over a partner.

IPV is common. It affects millions of people in the United States each year. More than 1 in 3 women (nearly 43.5 million) and more than 1 in 6 men (20.7 million) experienced contact sexual violence, physical violence, and/or stalking by an intimate partner during their lifetimes.

Among women, about 1 in 5 experienced contact sexual violence (19.7%), nearly 1 in 4 experienced physical violence (22.5%), and about 1 in 8 were stalked (12.2%). Among men, nearly 1 in 23 experienced contact sexual violence (4.4%), about 1 in 7 experienced physical violence (13.7%), and almost 1 in 24 were stalked (4.2%).

In their lifetimes, nearly 1 in 3 women and about 1 in 8 men experienced contact sexual violence, physical violence, and/or stalking and at least one related impact. Some impacts included physical injury, missing work or school, safety concerns, medical care needs, and filing a police report.

It is worth noting that the prevalence figures above are drawn from United States survey data and are cited here only to illustrate the general public health scale of intimate partner violence internationally. India's own reliable estimates come from the National Family Health Survey, which similarly found that close to three in ten ever-married women had experienced spousal

violence, a figure widely regarded as an undercount given the reluctance of many women to report abuse within marriage.⁷

Unlike random murders, intimate partner homicides usually evolve from prolonged abusive relationships rather than isolated criminal incidents.

3. Legal and Socio-Cultural Dimensions of Intimate Partner Homicide in India

The law in India serves as both a shield and a point of contention in cases of intimate partner violence. Statutes such as Sections 85 and 86 of the Bharatiya Nyaya Sanhita (BNS), which address cruelty by a husband or his relatives, and Section 80, which deals with dowry deaths, are central for preventing matrimonial offences against women. Yet concerns about misuse have led to judicial interventions, most notably the Arnesh Kumar judgment of 2014⁸ which curbed automatic arrests to prevent frivolous or vindictive litigation. In some instances, even the Calcutta High Court has described such misuse as ‘legal terrorism,’ citing highprofile cases where false allegations were weaponized; sometimes to extort, humiliate, or conceal extramarital affairs.⁹ Empirical scrutiny of these misuse claims paints a more complicated picture. An RTI-based study of five Delhi district courts found that of 9,950 trials under this cruelty provision between 2021 and 2024, only 23, or roughly 0.2 per cent, ended in conviction, while nearly 47 per cent of the cases were quashed and a further 736 resulted in acquittal.¹⁰ Such figures are cited by critics as evidence of rampant misuse, though they are equally consistent with poor investigation and prosecution, underscoring the difficulty of settling the misuse debate on numbers alone.

There are also disturbing cases where women have colluded with lovers or accomplices to murder their husbands, exploiting legal protections to deflect suspicion. Still, data from the recent National Family Health Survey shows that one in three Indian women report some form of abuse, and NCRB homicide statistics consistently reveal that women are most likely to be

⁷ International Institute for Population Sciences and Ministry of Health and Family Welfare, National Family Health Survey (NFHS-5) India 2019–21 (IIPS 2021).

⁸ Jain A. Case analysis: Arnesh Kumar v. State of Bihar. Desi Kaanoon. 2025. Available from: <https://desikaanoon.in/caseanalysis-arnesh-kumar-v-state-of-bihar/>

⁹ Ritu. Misuse of Section 498A IPC has unleashed a new “legal Terrorism”: Calcutta High Court quashes criminal proceedings. SCC Times. 2023. Available from: <https://www.scconline.com/blog/post/2023/08/23/misuse-s468aipc-has-unleashed-a-new-legal-terrorism-calcutta-hc-quashescriminal-proceedings/>

¹⁰ Pratik Tiwari, 'Cooling-Off And Committees: New Path For Section 85 BNS Reform' (LiveLaw, 10 August 2025) <<https://www.livelaw.in/articles/coolingoff-committees-new-path-section85-bns-reform-300442>> accessed 28 July 2026.

killed by someone within their own household.¹¹ The debate over misuse must be addressed with seriousness and alternative safeguards explored, but it should not be allowed to obscure the systemic and widespread nature of gendered violence.

3.1 BHARTIYA NYAYA SANHITA (BNS)

The criminal law undergoes sea changes with the passage of time. The old criminal laws were based on the philosophy of Dharma, Tradition and Customary Practices. During the British period it was based on will and whim of British philosophy to suppress and punish the people. The provisions under Indian Penal Code, 1860 (hereinafter IPC) inclined more towards punishment rather than reformation. With the introduction of various international convention on Human Rights and constitutional provisions these laws undergone rapid change. In 2023 new law was introduced as Bhartiya Nyaya Sanhita, 2023 (hereinafter BNS). The new philosophical journey is started from punishment to Nyaya. The modern changes in BNS significantly shape the new philosophy of criminal law. The main focus of BNS is on the restorative justice. In other words, one can say it is paradigm shift from punishment to Nyaya. The emphasis on social justice, proportionality, fairness, and human rights characterizes the modern criminal law doctrine. It aims to develop a criminal justice system that is more egalitarian and just while taking into account the problems of the 21st century. The concept behind criminal law will surely continue to change and adapt as society does in order to suit the ever-changing demands of both individuals and communities.

This continuity is visible in the treatment of matrimonial cruelty itself. The provision against cruelty by a husband or his relatives, introduced into the Indian Penal Code only in 1983 following the recommendations of a Joint Parliamentary Committee on dowry deaths, has been carried forward into the BNS in substantially the same form, with the definition of cruelty merely relocated to a separate section.¹² This suggests that, notwithstanding its stated philosophy of Nyaya over punishment, the BNS has so far made limited structural change to the specific provisions most relevant to relationship-related violence.

¹¹ 77% women remain silent about domestic violence, reveals NFHS5 data. *Hercircle.in*. 2022. Available from: <https://www.hercircle.in/engage/get-inspired/trending/77-womenremain-silent-about-domestic-violence-reveals-nfhs-5-data-2747>.

¹² Pratik Tiwari, 'Cooling-Off And Committees: New Path For Section 85 BNS Reform' (LiveLaw, 10 August 2025) <<https://www.livelaw.in/articles/coolingoff-committees-new-path-section85-bns-reform-300442>> accessed 28 July 2026.

3.2 Failure of Current Criminal Laws Regarding Murder in Relationship or Marriage

Even though the Indian Penal Code (IPC) and the Bharatiya Nyaya Sanhita (BNS), 2023 have strict criminal provisions, the existing legal system has not been entirely successful in preventing homicides that result from personal relationships or inside marriage. Domestic violence, coercive control, emotional abuse, threats, stalking, or recurring complaints that are not sufficiently addressed by law enforcement authorities sometimes precede such acts.

Violent circumstances sometimes develop into deadly instances due to inadequate risk assessment, societal stigma, victims' unwillingness to disclose abuse, police response delays, and lax enforcement of protective legislation. Furthermore, there are gaps in justice and accountability when investigators neglect to sufficiently look into the history of abuse or the larger context of gender-based violence.

The criminal justice system's primary concentration on responding to crimes after they are committed rather than on early prevention and victim protection is another major drawback. The organised methods for recognising high-risk domestic abuse situations, promptly issuing protective measures, and coordinating between police, protection officers, and social support agencies are not adequately included into the current legislative rules.

The deterrent impact of criminal law is further undermined by witness intimidation, protracted trials, insufficient victim assistance, and, in some situations, poor conviction rates. This concern is borne out by official figures: a decade after the Nirbhaya case prompted a wave of reforms, the conviction rate for crimes against women nationally stood at only 26.5 per cent in 2021, with 95 per cent of such cases still pending before the courts.¹³ Such chronic case backlogs mean that even where the substantive law is adequate, the practical deterrent value of prosecution remains severely diminished. In order to lower the number of murders that take place in partnerships and marriages, there is an increasing need for a more comprehensive legal strategy that incorporates effective criminal penalties with preventative interventions, victim-centered protection measures, and improved institutional coordination.

¹³ Vaibhavi Khanwalkar, '10 Years Of Nirbhaya: Conviction Rate In Crimes Against Women Just 26.5% In India' (Deccan Herald, 2022) <<https://www.deccanherald.com/india/10-years-of-nirbhaya-conviction-rate-in-crimes-against-women-just-265-in-india-1172228.html>> accessed 28 July 2026.

4. Important Provisions for Time-Bound Investigation and Trial

Mandatory Time Limit for Investigation: Except in extraordinary situations that the court has permitted, police investigations in murder cases involving relationships or marriages should be finished within the allotted statutory time.

Fast-Track Courts: Special fast-track courts should be established to conduct day-by-day hearings and ensure the speedy disposal of such cases.

India already possesses some experience with such specialised courts. As of mid-2026, 725 Fast Track Special Courts, including hundreds of exclusive courts for sexual offences, were functioning across the country, yet more than 2.4 lakh cases remained pending before them, illustrating that the creation of dedicated courts alone does not guarantee timely disposal without matching investment in infrastructure and staffing.¹⁴ Any time-bound framework for relationship-related murders would therefore need to learn from these implementation gaps rather than repeat them.

Fixed Timelines for Trial: To reduce needless delays, the legislation should specify deadlines for submitting the charge sheet, drafting charges, questioning witnesses, and delivering the verdict.

Witness and Victim Protection: Effective witness protection measures, victim support services, and digital evidence management should be provided to facilitate timely and fair prosecution.

5. Need of Separate Law

Recognition of Coercive Control: When compared to isolated actions, relationship killings are often the culmination of a pattern of violence that has been ongoing. When this environment is taken into consideration the courts are able to recognise patterns of coercion, surveillance, threat, and dominance tendencies.

Better Investigation: Instead of addressing every case as if it were a separate murder, the police might prioritise their investigations by concentrating on previous complaints, digital communications, financial control, medical records, and recorded abuse.

¹⁴ 'BT Explainer: What Are Fast Track Courts And How Fast Do They Work?' (Business Today, 25 July 2026) <<https://www.businesstoday.in/india/story/bt-explainer-what-are-fast-track-courts-and-how-fast-do-they-work-545202-2026-07-25>> accessed 28 July 2026.

Stronger Prevention: In situations when recurrent instances of domestic violence suggest an increased danger of murder, specific legal recognition may urge earlier action by law enforcement.

Improved Data Collection: Having a distinct legal category would make it easier to collect accurate national data on homicides committed by intimate partners, which would in turn allow for improved policymaking and more focused preventative initiatives. This gap is not merely hypothetical: commentators have pointed out that the NCRB's existing classification often records a death preceded by sustained cruelty as an abetment of suicide rather than as a homicide, which can understate the true extent of fatal intimate partner violence in official statistics.¹⁵

Victim-Centered Justice: To recognise that betrayal of trust and continuous coercion are significant considerations in determining criminal liability, it is necessary to acknowledge the specific damages that are inflicted by abuse within intimate relationships.

Such legislation would strengthen the preventive framework of criminal justice by addressing the root causes of relationship-related murders, ensuring timely intervention, and offering greater protection to vulnerable individuals while reinforcing the constitutional guarantees of life, dignity, equality, and personal liberty. Such legislation would strengthen the preventive framework of criminal justice by addressing the root causes of relationship-related murders, ensuring timely intervention, and offering greater protection to vulnerable individuals while reinforcing the constitutional guarantees of life, dignity, equality, and personal liberty.

6. Is it advisable for India to establish a special law?

A separate crime could be a symbolic recognition of the dynamics of intimate partner homicide which could help to promote specialist investigation. But, since there's already a crime of killing on purpose which is punishable by severe penalties, it is not likely that a new crime will have a huge impact on sentencing.

One might consider a more even-handed approach to:

¹⁵ Citizens for Justice and Peace, 'When "Marginal" Means Massive: The Invisible Weight Of Gendered Violence In NCRB Crime Statistics 2023' (CJP, 29 October 2025) <<https://cjp.org.in/when-marginal-means-massive-the-invisible-weight-of-gendered-violence-in-ncrb-crime-statistics-2023/>> accessed 28 July 2026.

- Understand intimate partner homicide as a serious type of homicide for sentencing.
- Enhance the legal definition of coercive control and domestic abuse.
- Enhance collaboration between police, prosecutors, healthcare providers and victim support services.
- Provide greater protection and emergency assistance for high-risk domestic violence victims.
- Establish specific investigative procedures for the possible intimate partner homicide.

A gender-neutral framing of these reforms is important, since the current criminal law is not always applied evenly to male victims of intimate partner homicide. Commentators have noted that husbands killed by wives or their accomplices are typically prosecuted under the ordinary murder provision without any specialised institutional attention comparable to that afforded to female victims, even though the underlying patterns of motive and concealment are often similar.¹⁶ An even-handed approach to reform should therefore ensure that any strengthened protections or investigative protocols apply irrespective of the victim's gender.

These reforms would tackle the specific nature of these offences without unnecessarily breaking up the homicide law.

7. Existing Legal Provision in India to Address IPV

Indian laws have largely targeted IPV, or marital domestic violence. Parliament added Section 498-A to the Indian Penal Code in 1983 to punish husbands who mistreat their wives. Indian courts now define domestic violence as physical, emotional, and psychological abuse. Interestingly, Indian law does not criminalise forced sexual activity on women or marital rape.

This position remains unsettled rather than fixed. The Chhattisgarh High Court, in February 2025, acquitted a man of raping his wife notwithstanding her dying declaration, applying the very exception under challenge, while the Supreme Court, having heard arguments on the

¹⁶ 'The Invisible Victim: Rising Husband Killings And The Gendered Blind Spots In Indian Criminal Law' (Jus Corpus, 2026) <<https://www.juscorpus.com/the-invisible-victim/>> accessed 28 July 2026.

constitutionality of the marital rape exception in October 2024, has yet to deliver its verdict.¹⁷ Until that litigation is resolved, the scope of criminal liability for non-consensual sexual conduct within marriage will continue to depend on which court a case happens to reach.

Section- 3 of the Domestic Violence Act, 2005 says that what comprises Domestic Violence as indicated by which Domestic Violence will include: -

- Threats to Life, Health & Safety etc., whether Physical or Mental, incorporating Sexual Abuse, Physical Abuse, Verbal and Emotional Abuse and Economic Abuse, or
- Harassment through any forms such as injuries, harms to the aggrieved person by coercing her or any other person related to any unlawful demand for dowry or other property or valuable security; or
- Otherwise injuring or causing harm, through Mental or Physical means to the Aggrieved Person.

India does have specific laws in place to protect women from intimate partner violence, like the Domestic Violence Act and Section 498A of the IPC. However, legal experts argue that these laws face issues with poor implementation and enforcement.

8. Data of NCRB and Other Agencies

The *Crime in India* report is the National Crime Records Bureau's (NCRB) flagship annual publication and the principal source of official crime statistics in India. Published since 1953, the report draws from the First Information Reports (FIRs) registered at police stations across the country. Since the rollout of the Crime and Criminal Tracking Network and Systems (CCTNS), crime data has largely been recorded and transmitted through a standardised digital system, with the State Crime Records Bureaus responsible for verification before submission to the NCRB for compilation and publication.

Agency	Latest Data	Key Statistics
National Crime	Crime in India 2023	In 2023, there were 4,48,211 recorded incidents of crimes against women, or almost 1,228 cases every day. With

¹⁷ 'The Marital Rape Exception: What The Law Says And What It Refuses To See' (Feminism In India, 14 April 2026) <<https://feminisminindia.com/2026/04/14/the-marital-rape-exception-what-the-law-says-and-what-it-refuses-to-see/>> accessed 28 July 2026.

Records Bureau (NCRB)		almost one-fourth of all occurrences, cruelty by spouses or family members continues to be the most common category of crimes against women.
NCRB	Crime in India 2023	In 2023, the murder rate in India was almost 2.0 per 100,000 people.
National Crime Records Bureau	Crime in India 2022	Cruelty by husband or relatives was the largest category of registered crimes against women, accounting for more than one in four cases.
UN Women & UNODC	Femicide Report (2025)	Globally, about 137 women and girls are killed every day by an intimate partner or family member, demonstrating that intimate partner homicide is a major international concern.

9. Conclusion

Intimate partner violence can be prevented. Certain factors may increase or decrease the risk of perpetrating or experiencing intimate partner violence. Preventing intimate partner violence requires understanding and addressing the factors that put people at risk for or protect them from violence.

Global data illustrate both the urgency and the difficulty of this task: recent UN estimates suggest that around 137 women and girls are killed by an intimate partner or family member somewhere in the world every day, a figure that has remained largely stagnant despite years of policy attention.¹⁸ This persistence suggests that legal reform alone, without corresponding investment in enforcement, survivor support and social attitudes, is unlikely to meaningfully reduce intimate partner homicide.

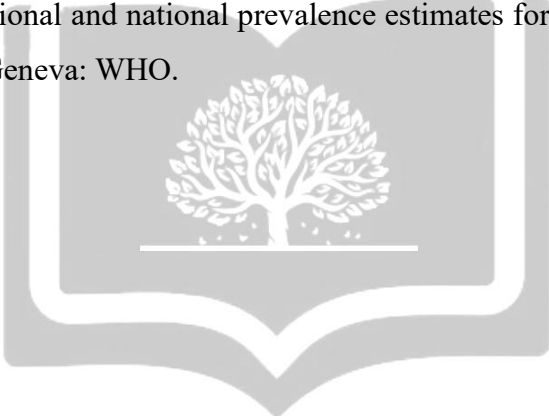
Promoting healthy, respectful, and nonviolent relationships and communities can help reduce the occurrence of intimate partner violence. It also can prevent the harmful and long-lasting effects of intimate partner violence on individuals, families, and communities.

¹⁸ UN Women and UNODC, Femicides in 2024: Global Estimates of Intimate Partner/Family Member Femicides (UN Women 2025).

References

- Arnesh Kumar v. State of Bihar, (2014) 8 SCC 273.
- Bourne, Paul. (2014). Does Marriage Explain Murders in a Society? In What Way is Divorce a Public Health Concern? *International Journal of Emergency Mental Health and Human Resilience*. 16. 10.4172/1522-4821.1000116.
- Bourne, Paul & Hudson-Davis, Angela & Sharpe-Pryce, Charlene. (2015). The Psychology of Homicide, Divorce and Issues in Marriages: Mental Health and Family Life Matters. *International Journal of Emergency Mental Health and Human Resilience*. s2. 10.4172/1522-4821.1000184.
- Dobash, R. E., & Dobash, R. P. (2015). *When Men Murder Women*. Oxford University Press.
- International Institute for Population Sciences., & Ministry of Health and Family Welfare. (2021). *National Family Health Survey (NFHS-5), 2019–21*. Mumbai: IIPS.
- International Labour Organization., UN Women., & World Health Organization. (2022). *Measuring the prevalence of intimate partner violence against women: Key terms, definitions and recommendations*. Geneva: WHO.

- Kans Raj v. State of Punjab, (2000) 5 SCC 207.
- Ministry of Law and Justice. (2005). The Protection of Women from Domestic Violence Act, 2005 (Act No. 43 of 2005). Government of India.
- Ministry of Law and Justice. (2023). The Bharatiya Nyaya Sanhita, 2023 (Act No. 45 of 2023). Government of India.
- National Crime Records Bureau. (2023). Crime in India 2022: Statistics. Ministry of Home Affairs, Government of India.
- Stark, E. (2007). Coercive Control: How Men Entrap Women in Personal Life. New York, NY: Oxford University Press.
- World Health Organization. (2021). Violence against women prevalence estimates, 2018: Global, regional and national prevalence estimates for intimate partner violence against women. Geneva: WHO.



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