

LEGAL PROTECTION OR LEGAL WEAPON? ANALYSING THE MISUSE DEBATE IN DOMESTIC VIOLENCE LAWS

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Abstract

The debate surrounding the alleged misuse of domestic violence laws in India has generated significant legal and societal concern, often positioning such legislation as both a tool of protection and, at times, a perceived instrument of harassment. The Protection of Women from Domestic Violence Act, 2005 was enacted to provide comprehensive civil remedies to victims facing abuse within domestic relationships. However, growing claims of misuse have influenced public discourse, raising questions about the effectiveness and fairness of these legal protections. This study seeks to examine whether such narratives are grounded in empirical reality or shaped by societal and media perceptions.

The primary objectives of this research are to analyse the extent of alleged misuse, evaluate its impact on access to justice, and assess how such claims influence societal attitudes toward victims. The research addresses key problems, including whether misuse is statistically significant, how it affects the credibility of genuine complaints, and whether legal safeguards adequately balance protection with prevention of abuse.

Adopting a socio-legal methodology, the study combines doctrinal analysis of statutes and judicial pronouncements with secondary data from sources such as the National Crime Records Bureau and a review of media narratives. This approach enables a comprehensive understanding of both legal provisions and their societal interpretation.

The findings indicate that while instances of misuse cannot be entirely denied, they are relatively limited and often overstated in public discourse. Such exaggeration contributes to

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the stigmatization of complainants, discourages reporting of genuine cases, and risks undermining the protective intent of the law. The study concludes that a balanced approach—incorporating procedural safeguards without weakening victim protection—is essential to uphold the objective of gender justice.

Keywords: *Domestic Violence, Misuse Debate, Gender Justice, Socio-Legal Analysis, Access to Justice*

INTRODUCTION

The development of protective legislation for women in India represents a significant legal response to entrenched gender disparities and the persistent reality of violence rooted in socio-cultural norms. Historically, women have been subjected to systemic discrimination, both within domestic spaces and in public life, which has necessitated the creation of targeted legal safeguards to uphold their rights, dignity, and security. In this context, several legislative measures have been enacted, including the *Protection of Women from Domestic Violence Act, 2005*, provisions relating to cruelty by husbands and relatives under *Section 498A of the Indian Penal Code* (now incorporated within the Section 85 of *Bharatiya Nyaya Sanhita*), and the *Dowry Prohibition Act, 1961*. These laws aim to address various forms of abuse, ranging from physical and emotional violence to economic exploitation and dowry-related harassment¹.

Despite their progressive objectives, these legal frameworks have increasingly come under scrutiny in recent years due to allegations of misuse. A growing section of public discourse—often influenced by selective media representation and anecdotal accounts—suggests that such provisions are sometimes invoked in a manner that leads to harassment of husbands and their families. This has contributed to the emergence of a competing narrative, where laws intended as instruments of protection are perceived, in certain instances, as mechanisms capable of being weaponised.

This dichotomy between protection and alleged misuse has generated a complex legal and societal debate. It raises critical questions about the balance between ensuring justice for victims of gender-based violence and preventing the potential abuse of legal provisions. More importantly, it invites an inquiry into whether claims of misuse are supported by credible empirical evidence or whether they reflect deeper patriarchal resistance to shifting gender dynamics and the increasing assertion of women's rights.

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Against this backdrop, the present article undertakes a critical examination of the scope and effectiveness of protective laws for women, the nature and extent of their alleged misuse, and the implications of this debate for the evolving concept of gender-neutral justice within the Indian legal system.

RESEARCH PROBLEM

This study examines a set of interrelated concerns surrounding the functioning of protective laws for women. It seeks to determine whether instances of misuse occur at a level substantial enough to warrant legal or policy reconsideration. At the same time, it questions whether the growing discourse around such misuse has the unintended consequence of weakening the credibility of genuine complainants and restricting their access to justice.

Further, the research evaluates whether the current legal framework maintains an appropriate equilibrium between safeguarding victims and ensuring procedural fairness for the accused. In doing so, it also engages with a broader normative question: whether reform should move in the direction of gender-neutral legal provisions or, alternatively, focus on improving enforcement, accountability, and implementation within the existing system.

OBJECTIVES OF THE STUDY

- To critically review the existing legal framework governing protective laws for women in India.
- To investigate the scope, patterns, and characteristics of alleged misuse of these legal provisions.
- To examine how narratives surrounding misuse influence victims' access to justice and the overall functioning of the justice system.
- To analyse whether there is a necessity for transitioning towards gender-neutral legal reforms.
- To propose recommendations aimed at ensuring an equitable balance between victim protection and procedural fairness.

LITERATURE REVIEW

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Academic discourse on the issue of misuse of protective laws reveals a clear divergence of opinions. A section of scholars contends that claims of widespread misuse are overstated and often stem from patriarchal resistance to the growing assertion of women's rights². Others, while not denying that misuse does occur in certain instances, warn against treating such cases as indicative of a broader systemic problem.³

Flavia Agnes emphasizes that protective legal measures play a crucial role in addressing deeply embedded structural violence against women and argues that their effectiveness should not be compromised due to sporadic instances of misuse⁴. In a similar vein, empirical studies drawing upon data from the National Crime Records Bureau indicate that high rates of acquittal cannot be automatically equated with the filing of false cases, as they may instead reflect evidentiary challenges, witness hostility, or societal pressures faced by complainants.⁵ On the other hand, certain legal analysts draw attention to judicial pronouncements that recognize the potential for misuse, particularly in the context of matrimonial disputes. The Supreme Court of India has, in several instances, observed that provisions such as Section 498A may be invoked in a manner that results in harassment, thereby underscoring the need for appropriate procedural safeguards.⁶

The role of media in influencing public opinion is also significant in this context. Sensationalized reporting tends to disproportionately highlight isolated instances of misuse, which can lead to a skewed and often exaggerated perception of how these laws operate in practice.⁷

Overall, the existing body of literature suggests that although misuse of protective laws is not entirely absent, its prevalence and consequences remain subjects of ongoing debate and lack definitive consensus.

METHODOLOGY

The present study employs a socio-legal research design that integrates both doctrinal and empirical methods to ensure a holistic analysis.

DOCTRINAL ANALYSIS

The doctrinal component involves a detailed examination of key legislative frameworks governing the protection of women, including the *Protection of Women from Domestic*

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Violence Act, 2005, the *Dowry Prohibition Act, 1961*, and relevant provisions under criminal law. In addition, the study analyses important judicial pronouncements and authoritative legal commentaries to understand the interpretation and application of these laws.

EMPIRICAL / SECONDARY DATA

The empirical aspect of the research is based on secondary sources of data, such as reports published by the National Crime Records Bureau, findings of the Law Commission of India, scholarly writings, and media coverage.

By combining doctrinal analysis with empirical insights, this approach facilitates a nuanced understanding of both the legal framework and the societal narratives surrounding the issue.

LEGAL FRAMEWORK: SAFEGUARDS FOR WOMEN

Protective legislation for women in India is not merely punitive in nature but is designed as a comprehensive legal response to various forms of gender-based violence and structural inequality. These laws aim to provide immediate relief, ensure accountability, and create a deterrent effect against abuse.

PROTECTION OF WOMEN FROM DOMESTIC VIOLENCE ACT, 2005

The *Protection of Women from Domestic Violence Act, 2005* (PWDVA) marks a significant shift from a purely criminal law approach to a more victim-centric civil framework. Unlike traditional penal provisions, the Act prioritizes speedy relief and rehabilitation of the aggrieved woman.⁸

It provides a wide range of remedies, including:

- **Protection Orders** to prevent further acts of violence
- **Residence Orders** ensuring a woman's right to reside in the shared household, regardless of ownership
- **Monetary Relief** for expenses incurred due to abuse, including medical costs and loss of earnings
- **Custody Orders** for children, ensuring their welfare
- **Compensation Orders** for mental torture and emotional distress

A key strength of the Act lies in its broad definition of domestic violence, which includes physical, emotional, verbal, sexual, and economic abuse. Importantly, it extends protection

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not only to legally married women but also to those in relationships in the nature of marriage, thereby acknowledging evolving social realities.

Additionally, the Act introduces Protection Officers and recognizes the role of service providers, making it an integrated mechanism that combines legal and social support systems.

SECTION 498A (CRUELTY BY HUSBAND OR RELATIVES)/ SECTION 85 OF BNS

Section 498A of the *Indian Penal Code* (now reflected in corresponding provisions under the *Bharatiya Nyaya Sanhita*) is a criminal law provision specifically aimed at addressing cruelty inflicted upon married women by their husbands or in-laws.⁹

“Cruelty” under this provision includes:

- Conduct likely to drive a woman to suicide
- Acts causing grave physical or mental injury
- Harassment linked to unlawful demands for dowry

The classification of this offence as cognizable and non-bailable reflects the legislature’s intent to treat such offences with seriousness and urgency. It empowers the police to register cases and take action without prior court approval.

This provision has played a crucial role in:

- Bringing domestic abuse within the ambit of criminal accountability
- Acting as a deterrent against dowry-related harassment
- Providing women with a legal mechanism to challenge systemic abuse within matrimonial homes

At the same time, its strict nature has also led to judicial scrutiny, particularly concerning procedural safeguards, highlighting the need to balance victim protection with prevention of arbitrary arrest.

DOWRY PROHIBITION ACT, 1961

The *Dowry Prohibition Act, 1961* is one of the earliest legislative efforts to combat the deeply entrenched social practice of dowry, which often acts as a catalyst for violence against women.¹⁰

The Act:

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- Prohibits the giving and taking of dowry
- Penalizes demands for dowry, whether made before, during, or after marriage
- Provides for punishment in the form of imprisonment and fines

Despite its strong legislative intent, enforcement challenges persist due to:

- Social acceptance of dowry in disguised forms (gifts, customary exchanges)
- Underreporting due to familial and societal pressures
- Difficulty in proving dowry transactions

Nevertheless, the Act remains a foundational statute, forming the basis for other legal provisions such as Section 498A and dowry death laws. It addresses the root cause of many forms of domestic violence, thereby playing a preventive as well as punitive role.

OVERALL SIGNIFICANCE

Collectively, these laws create a multi-dimensional legal framework that combines civil remedies, criminal sanctions, and preventive measures. While the PWDVA focuses on immediate protection and rehabilitation, Section 498A introduces criminal liability, and the Dowry Prohibition Act targets the underlying socio-economic practice fueling such abuse.

Together, they reflect the Indian legal system's attempt to move beyond formal equality and towards substantive justice for women, though their effectiveness ultimately depends on proper implementation and societal awareness.

MISUSE DEBATE: MYTH OR REALITY?

The discourse on the alleged misuse of protective laws for women operates at the intersection of law, society, and gender politics. It is not merely a question of legal abuse, but a deeper inquiry into how law is perceived, applied, and contested in a society undergoing gradual shifts in gender relations. The debate is often polarized—on one side are claims that such laws are frequently exploited, while on the other is the argument that these claims are overstated and risk undermining essential legal protections.

JUDICIAL OBSERVATIONS

Judicial responses to the misuse debate reveal a nuanced and balanced approach. In *Arnesh Kumar v. State of Bihar*¹¹, the Supreme Court of India recognized concerns regarding the potential for misuse of Section 498A, particularly in the context of automatic arrests. To

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address this, the Court introduced safeguards such as mandatory compliance with arrest procedures and the requirement of justification before detention.

This intervention was not an indication that the provision itself is inherently flawed, but rather a reflection of concerns regarding its implementation by enforcement agencies. The judiciary has repeatedly clarified that procedural safeguards are intended to prevent abuse of process, not to weaken the substantive protection available to women.

Moreover, in subsequent decisions, courts have stressed that isolated instances of misuse cannot form the basis for delegitimizing the entire statutory framework. The judiciary continues to acknowledge the harsh realities of domestic violence and dowry-related abuse, emphasizing that such laws remain indispensable in addressing systemic injustice.

STATISTICAL PERSPECTIVE

A closer examination of crime data, particularly from the National Crime Records Bureau, reveals the complexity of interpreting legal outcomes. While high acquittal rates in Section 498A cases are often cited as evidence of misuse, such a conclusion oversimplifies the issue.

In reality, acquittals may stem from multiple structural and procedural challenges, such as:

- **Evidentiary limitations**, especially in cases involving psychological or emotional abuse, which are inherently difficult to prove
- **Hostile witnesses**, often due to familial pressures or attempts at reconciliation
- **Out-of-court settlements or compromises**, which may lead to withdrawal or weakening of the prosecution's case
- **Delays in the judicial process**, which can erode evidence and reduce the likelihood of conviction

Additionally, underreporting of domestic violence remains a persistent issue, suggesting that the number of cases reaching courts may itself not reflect the true scale of the problem. Therefore, statistical data must be interpreted cautiously, keeping in mind the broader socio-legal context.

MEDIA AND PUBLIC PERCEPTION

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Media narratives significantly shape public understanding of the misuse debate, often in ways that lack nuance. High-profile or sensational cases alleging false accusations tend to receive disproportionate attention, creating a perception that misuse is widespread and systemic.

This form of representation can have a chilling effect on victims, who may fear being disbelieved, stigmatized, or accused of fabricating claims. It also risks reinforcing patriarchal stereotypes that portray women as manipulative or vindictive, thereby undermining the credibility of genuine complaints.

At the same time, such narratives can influence law enforcement practices and judicial attitudes, sometimes leading to increased scepticism toward complainants. This, in turn, may weaken the effectiveness of protective laws by creating additional barriers to justice.

CRITICAL INSIGHT

Ultimately, the misuse debate cannot be understood in binary terms of “myth” or “reality.” While instances of misuse do exist and warrant procedural safeguards, they must be evaluated in proportion to the larger objective of these laws—protecting women from systemic and often invisible forms of violence.

The real challenge lies in maintaining a careful balance: preventing abuse of legal provisions without diluting their protective intent. This requires not only legal reform but also institutional sensitivity, responsible media reporting, and greater societal awareness.

IMPACT OF MISUSE NARRATIVES

The discourse surrounding the alleged misuse of protective laws has consequences that extend far beyond isolated legal cases. It influences how victims perceive the justice system, how institutions respond to complaints, and how society at large understands gender-based violence. While concerns about misuse may hold some validity, the amplification of such narratives often produces deeper structural effects that require careful examination.

IMPACT ON VICTIMS

The persistent emphasis on misuse creates a climate of doubt and hesitation for victims seeking justice. Women experiencing abuse may become reluctant to report incidents due to the fear of being disbelieved, socially stigmatized, or accused of fabricating allegations for personal motives. This is particularly concerning in a context where reporting itself is already

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hindered by factors such as financial dependence, emotional vulnerability, and pressure from family or community.

Such narratives can also result in internalized fear and self-censorship, where victims question the legitimacy of their own experiences before approaching legal remedies. Even when complaints are filed, women may face heightened scrutiny, character judgment, and scepticism regarding their intentions, leading to what is often described as secondary victimization.

Consequently, the broader effect is a chilling impact on reporting, allowing many instances of genuine abuse to remain unaddressed and perpetuating cycles of violence within domestic and social spaces.

IMPACT ON THE LEGAL SYSTEM

The increasing prominence of misuse claims has also shaped institutional responses within the legal system. Courts and law enforcement agencies, in an attempt to prevent wrongful implication, may adopt more cautious and restrictive procedural practices. While such safeguards are important to uphold fairness, they can inadvertently slow down the process of justice for those in urgent need of protection.

For example, stricter arrest guidelines, additional layers of verification, and cautious investigative approaches may delay immediate intervention in situations involving domestic violence. In cases where timely action is critical, such delays can expose victims to continued harm and reduce the effectiveness of legal remedies.

Moreover, an excessive focus on potential misuse may gradually shift the orientation of the legal process—from prioritizing victim protection to emphasizing risk management and suspicion. This can dilute the original purpose of protective laws and create inconsistencies in their application, where outcomes are influenced by perceptions rather than substantive evidence.

IMPACT ON SOCIETY

At the societal level, the widespread circulation of misuse narratives tends to reinforce existing gender biases and patriarchal assumptions. By portraying protective laws as prone to exploitation, such narratives can undermine the credibility of women's experiences and contribute to a culture of disbelief.

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This, in turn, affects how communities, families, and even institutions respond to allegations of abuse. Victims may encounter blame, trivialization of their suffering, or pressure to remain silent in order to preserve social harmony. The perception that laws are “easily misused” can also weaken public support for legal protections, making it more difficult to advocate for stronger safeguards.

Additionally, this focus diverts attention from the root causes of gender-based violence, such as entrenched social norms, economic inequality, and power imbalances. Instead of encouraging reforms aimed at better implementation and victim support, the discourse risks shifting toward limiting or questioning the necessity of such laws.

OVERALL PERSPECTIVE

In essence, misuse narratives shape not only legal outcomes but also the broader environment in which justice is sought and delivered. While it is necessary to address genuine instances of misuse through appropriate safeguards, an exaggerated or one-sided focus on this issue can weaken the protective intent of the law. A balanced approach requires acknowledging misuse without allowing it to overshadow the urgent need to ensure accessible, effective, and empathetic justice for victims of abuse

GENDER-NEUTRAL JUSTICE: A WAY FORWARD?

In recent years, the demand for gender-neutral legal frameworks has gained increasing visibility within legal and policy discussions. Advocates of this approach argue that laws addressing violence and abuse should be framed in a manner that protects all individuals, irrespective of gender, thereby ensuring equality before the law and preventing discriminatory application. From this perspective, extending legal protection to men and individuals of diverse gender identities is seen as a step toward a more inclusive and equitable justice system.

However, this proposition is not without criticism. Opponents caution that a shift toward complete gender neutrality may overlook the ground realities of gender-based violence¹², where women continue to constitute a disproportionately affected group. They argue that existing protective laws were specifically designed to address historical and structural disadvantages faced by women, including economic dependency, social conditioning, and entrenched power imbalances within familial and societal structures. Diluting these targeted

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protections in the name of neutrality could risk weakening the safeguards available to those who need them the most.

Furthermore, critics highlight that formal equality—treating everyone the same—does not necessarily result in substantive equality, which requires acknowledging and addressing existing inequalities. In this sense, gender-specific laws are often viewed as corrective measures aimed at levelling the playing field rather than creating preferential treatment.

At the same time, the concerns raised by proponents of gender-neutrality cannot be entirely dismissed. There is a growing recognition that individuals other than women may also experience domestic violence and abuse, and that legal systems should be responsive to such realities. This has led to discussions on whether reforms can be introduced to make laws more inclusive in application, without undermining their protective intent.

Therefore, the path forward lies in adopting a balanced and nuanced approach. Instead of a complete shift to gender-neutral laws, a more effective solution may involve:

- Strengthening implementation mechanisms to prevent misuse
- Incorporating procedural safeguards to ensure fairness for all parties
- Expanding support systems to address the needs of diverse victims
- Retaining the gender-sensitive character of laws where structural inequalities persist

Ultimately, the objective should be to create a legal framework that harmonizes fairness with social reality—one that upholds equality before the law while remaining sensitive to the unequal conditions in which individuals experience violence.

KEY FINDINGS

- Instances of misuse of protective laws do occur; however, their prevalence appears to be considerably lower than what is often suggested in public discourse.
- Media representations tend to amplify and sensationalize cases of misuse, thereby shaping and, at times, distorting societal perceptions.
- The narrative surrounding misuse has adverse consequences for genuine victims, particularly by discouraging reporting and limiting effective access to justice.
- The current legal framework offers substantial protective mechanisms, though its effectiveness is often hindered by gaps in implementation and enforcement.

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- Any move toward gender-neutral legal reforms should be undertaken with caution to ensure that existing protections for vulnerable groups are not inadvertently diluted.

SUGGESTIONS

- **Enhancing Investigative Processes:** Strengthen investigative procedures to ensure that complaints are examined in a fair, unbiased, and comprehensive manner.
- **Judicial Sensitization:** Promote specialized training and awareness programs for judges to enable a more nuanced and balanced approach while adjudicating such cases.
- **Addressing False Complaints:** Establish appropriate safeguards to deter malicious or frivolous complaints, while ensuring that such measures do not discourage genuine victims from seeking justice.
- **Public Awareness Initiatives:** Conduct educational campaigns to improve societal understanding of the objectives, scope, and significance of protective laws.
- **Strengthening Support Services:** Expand access to legal aid, counseling, and rehabilitation services to better assist victims throughout the legal process.
- **Improving Data Transparency:** Develop more reliable and transparent data collection mechanisms to accurately evaluate the extent of misuse and inform policy decisions.

CONCLUSION

Protective laws for women constitute a vital component of India's pursuit of substantive gender justice, particularly in a social context where inequality and gender-based violence remain deeply entrenched. These legal provisions are not merely symbolic; they function as essential safeguards intended to secure dignity, safety, and equal participation for women within both private and public spheres.

Although the possibility of misuse cannot be entirely ruled out, available evidence and scholarly analysis suggest that such instances are comparatively limited and should not detract from the broader necessity and effectiveness of these laws. An excessive focus on misuse risks diverting attention from the structural realities that continue to make such legal protections indispensable.

The growing narrative around misuse—often reinforced by selective media representation and prevailing social biases—poses a significant challenge. It can erode public confidence in victims' claims, discourage reporting of genuine cases, and ultimately weaken the operational

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strength of the legal framework. In this sense, the harm caused by exaggerated misuse discourse may extend beyond individual cases to affect the overall credibility and accessibility of justice mechanisms.

What is required, therefore, is a carefully calibrated approach that acknowledges the need for procedural safeguards while preserving the core protective purpose of these laws. Strengthening investigative processes, ensuring judicial sensitivity, and improving implementation can address concerns of misuse without diluting the rights of victims.

Furthermore, the ongoing debate on gender-neutral justice must be approached with caution and contextual awareness. While inclusivity and fairness are essential goals, they must not come at the expense of ignoring the structural and historical disadvantages faced by women. True equality lies not in identical treatment, but in a legal system that is responsive to unequal realities.

In conclusion, the path forward lies in building a framework that harmonizes fairness, accountability, and social justice—one that safeguards against misuse while remaining firmly committed to protecting those most vulnerable to gender-based violence.

FOOT NOTES

1. Protection of Women from Domestic Violence Act, 2005.
2. Aparna Chandra, *Gender Justice and Law Reform in India*, Oxford University Press (2018).
3. Law Commission of India, *Report on Section 498A IPC*, Report No. 243 (2012).
4. Flavia Agnes, *Law and Gender Inequality*, Oxford University Press (1999).
5. National Crime Records Bureau (NCRB), *Crime in India Report* (2024).
6. *Sushil Kumar Sharma v. Union of India*, (2005) 6 SCC 281.
7. Media Watch Reports on Gender Laws (Various sources).
8. Section 3, Protection of Women from Domestic Violence Act, 2005.
9. Section 498A, Indian Penal Code, 1860 / Section 85, Bharatiya Nyaya Sanhita, 2023.
10. Dowry Prohibition Act, 1961.
11. *Arnesh Kumar v. State of Bihar*, (2014) 8 SCC 273.
12. Nivedita Menon, *Seeing Like a Feminist*, Zubaan (2012).

REFERENCES

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Statutes

1. *Protection of Women from Domestic Violence Act, 2005.*
2. *Dowry Prohibition Act, 1961.*
3. *Indian Penal Code, 1860* (now replaced by Bharatiya Nyaya Sanhita).
4. *Bharatiya Nyaya Sanhita, 2023.*

Cases

5. *Arnesh Kumar v State of Bihar*, (2014) 8 SCC 273.
6. *Rajesh Sharma v State of Uttar Pradesh*, (2017) 8 SCC 746.
7. *Social Action Forum for Manav Adhikar v Union of India*, (2018) 10 SCC 443.

Reports

8. National Crime Records Bureau, *Crime in India Report* (latest available edition).
9. Law Commission of India, *243rd Report on Section 498A IPC* (2012).

Books & Articles

10. Flavia Agnes, *Law and Gender Inequality: The Politics of Women's Rights in India* (Oxford University Press, 1999).
11. Law Commission of India, *Report on Dowry Deaths and Law Reform* (91st Report).
12. Scholarly articles on misuse of Section 498A and gender justice (relevant journal sources).

Newspapers / Media

13. *The Hindu*, *Indian Express*, and other reputed newspapers for discussions on misuse debates and legal reforms.

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