Hindu law is one of the oldest systems of Law. It is generally agreed, that it has the most ancient pedigree of any known system of jurisprudence. Thus, the study of any concept, rules or practices existing under the Hindu Law have to be examined over a vast period of time. The Hindu Law is indeed generally recognized as having its origin in the Vedic age. The term 'Hindu Law' as we understand it today, has a somewhat different meaning than what it meant originally. Hindu Law may be broadly categorized as Ancient Hindu Law and Modern Hindu Law. It is generally believed that the theological tenets of the Vedic Aryans and the philosophical theories which the genius of the race produced necessarily influenced the system of Hindu Law. Thus, the “Ancient Hindu Law not abrogated or modified by legislation, may be described as rooted in the Vedas and enounced in the Smritis as explained and enlarged in recognized commentaries and digests and as supplemented and varied by approved usage”. With the passage of time, and changing social norms, the rules of Hindu Law also underwent some change. With the influence of English law and legislative changes, the body of Hindu Law was greatly modified and there came into being the Modern Hindu Law, as modified and abrogated by legislation.

The subject of women’s rights has been dealt with extensively in the past by researchers and social thinkers having a keen interest in the feminist jurisprudence. In the present work, an attempt has been made to undertake an analysis of the rights of Women under Hindu Law. Thus, when we talk of Hindu Law, it simply means to assess the position from the Vedic ages to the modern times. The term 'right', means "that which is so directed for the protection and advantage of an individual." Black's

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2 Radha Binod Pal, History of Hindu Law in Vedic and Post Vedic Times down to the Institutes of Manu, p.6, (1958)
3 Supra 1, p. 2
4 A.S. OPPE, Wharton’s Law Lexicon, 14th ed. (1938)
law dictionary puts it as "something that is due to a person by just claim, legal
guarantee, or moral principle, a power, privilege or immunity secured to a person by
law, a recognized and protected interest the violation of which is a wrong."\textsuperscript{5}

The Hindu society has been patriarchal from the beginning. The personal law
of the Hindus traditionally was based on patriarchal notions. Thus, women under
Hindu law were denied several rights. The transition from the rigorous law of the
ancient period to a liberal and humane law of modern era took several centuries. The
process of reform has been ushered by enactment of ameliorating laws to check social
injustice towards women. The underlying assumption of such laws is the concept of
'social engineering' followed by Roscoe Pound. In the present work a discourse on
the marital rights, economic rights, property rights and parental rights has been made.
These rights were secured to a Hindu woman largely through the enactments under
the Hindu Code. However, some of these rights are supplemented by some secular
from Domestic Violence Act 2005}, \textit{The Guardian and Wards Act 1890}, \textit{The Indian
Penal Code}, some provisions of the \textit{Cr.PC}, the \textit{Dowry Prohibition Act 1961} etc.
which have also been discussed wherever their reference arose.

The Hindu Women have come a long way from the Vedic age to the modern
day. The rights which she enjoyed at different stages of development of Hindu society
were dependent upon the status she enjoyed in society. The \textit{Smritis} and
\textit{Dharamshastras} consolidated the position of a woman to be subservient to the male.
She was considered to be devoid of an independent identity and was dependent on the
father, husband or sons. As a wife, she was the \textit{ardhangini} but her functions were
confined as a caretaker of the family who was always a symbol of selfless service and
sacrifice. Slowly, several restrictions were imposed upon the movement, behavior,
and education etc. of woman. They were not capable of inheriting and holding
property absolutely except for the Stridhan. Slowly, the encounter with western
thought and ideology, there was rise of the social reform movement in India. It was
realized that women deserved a better position. In this direction, various legislative
reforms were introduced. The evils to be eradicated were many, namely; child

\textsuperscript{5} Bryan A. Garner (ed), \textit{Black's Law Dictionary}, 7\textsuperscript{th} ed. (1999)
marriage, sati, unequal property rights, marital and economic rights. On the other hand, the abhorrence for a female child grew and can be seen even today. The skewed sex ratio is an evidence of female infanticide still being in vogue especially in Punjab, Haryana and Uttar Pradesh.

Hindu Law as reformed and modified by the *H.M.A. 1956*, gave several rights to a Hindu woman like divorce, right to annul the marriage, restitution of conjugal rights, maintenance. A discussion of these rights reveals that although formal equality has been granted by the Act but in practice, a Hindu woman is denied some of the basic rights due to prevailing social conditions. Marriage is a union of two persons who live together and carry out various responsibilities imposed upon them by the relationship. Thus there can be no doubt that to discharge one’s responsibilities, one should have the requisite capacity. The age of persons marrying has a very important bearing in their being able to discharge their marital duties well and thus be able to enjoy the rights within marriage. A female always suffers more in a child marriage. The ill effects like early pregnancy, miscarriages, sexual abuse etc. leave a young bride shattered. Thus, to remedy the situation the *Child Marriage Restraint Act* was passed in 1929 which did not affect the validity of such marriages. It simply provided punishment for solemnizing child marriage which too was very mild. Thus it was termed as a toothless law. In 2006, another step in this direction was taken by enacting the *Prohibition of Child marriage Act 2006* which replaced the earlier law. The Act defines a child as a male below the age of 21 years and female below the age of 18 years. Child marriages are made voidable at the option of the contracting party who was a child at the time of the marriage. Child marriage is made void in some circumstances only. Punishment for child marriage is enhanced to rigorous imprisonment upto 2 years or fine upto Rs. one lakh. Provision for Injunction to restrain child marriage is provided and the act also provides for appointment of Child Marriage Prohibition Officers with power to prevent and prosecute child marriage. *The Hindu Marriage Act* still has not been amended in conformity with the *Prohibition of Child Marriage Act*. Under *HMA*, child marriages continue to be valid. Even under the *PCMA 2006*, child marriage is generally voidable. This will allow the parties to still perform child marriage.
Divorce, often has an emotionally and financially draining effect upon a woman. Even though she may claim the right to divorce to end an abusive relation, her victory too comes with loss. Loss of reputation and financial instability are few of the evil consequences of divorce. If she exercises this right, she is often termed as being inadajusting, too independent, stubborn etc. Thus the stigma attached to divorce is a heavy price she pays for exercising her rights. Many women even now continue to suffer in silence for the fear of being branded as a divorcee. The notion of indissolubility of marriage has been discarded by law but continues to be retained in the mind set of Hindu society. The Marriage Laws (Amendment) Bill 2010 proposes irretrievable breakdown of marriage to be a ground of divorce in itself. Period of 3 years separation to be evidence of irretrievable breakdown of marriage

Another disturbing aspect is the existence of bigamy in spite of legal prohibition and the havoc that it creates in the life of a woman. Both the lawful wife and the one in bigamous marriage suffer. The suffering is rightly brought to the fore by Flavia Agnes while referring to the case S v. R in which the plight of Seema and Rekha, victims of such a marriage has been discussed. In this case, the husband had duped both the ladies into marriage. All through, he was looked after by Seema (as he was suffering from AIDS). After his death dispute arose between Seema and Rekha as both were claiming to be wives of the same man. Thus, the women were left to prove the validity of their marriages in order to lay claim to the provident fund of the husband. The legitimacy of Seema’s children also lay at stake. In the narrative, Agnes points out towards the efforts of the judges to work out a compromise and settlement fearing that the procedure of proving validity of marriage would be tough and chances of Seema not being able to prove the same were high. Though Seema succeeded, it took her seven long years to do so and she had spent more than she would gain from her husband’s provident fund.

The Protection of women from Domestic Violence act 2005 was considered as a breather for wives of bigamous marriages, as it allowed women in relationship ‘in the nature of marriage’ to claim reliefs under the Act, which could include economic reliefs of residence and maintenance. However, the Supreme Court recently extinguished the hopes of such women by equating the meaning of ‘relation in the

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6 2010 (1) Mh. Lj 253.
nature of marriage’ with common law marriage. This meant that the parties should have capacity to marry including not being previously married. Seen from the angle of legally wedded wives, it is a good judgment but if seen from the angle of innocent women who are duped in bigamous marriage, it seems unjust resulting in denial of their rights.

The utility of provision of restitution of conjugal rights also seems to be questionable. It has been seen in various cases that the provision has been used by husbands to harass their wives. Although, these days the judiciary has been very sensitive towards the wives and has interpreted the provision liberally, the sword of restitution always hangs upon a wife. It has been argued that the provision is useful as many wives are able to claim maintenance by filing a suit for restitution. The reason for such argument is that maintenance is only an ancillary relief which can be claimed by filing a substantive relief. However, it is submitted that this limitation must be removed and the wife should not be made to use the provision of restitution just to claim maintenance.

The issue regarding the sharing of matrimonial property is another matter of concern. Presently, section 27 of Hindu Marriage Act, 1955 deals with the property acquired by husband and wife jointly or received at the time of marriage. The court can make appropriate orders regarding the same. The Marriage Laws (Amendment) Bill 2010 seeks to provide a share to the wife in the matrimonial property. It is proposed to give her rights in the residential property of the husband and any other property on the discretion of the court. This is a step further in the direction of the right to reside in the shared household which has been already granted by the Protection of Women from Domestic Violence Act 2005. Even though wife may not jointly hold property with the husband, she can still get a share in it. This recognizes her indirect contribution in household towards acquisition of matrimonial property. It is necessary to make such provision keeping in mind the social set up of our society where wife may not be contributing directly but her indirect contribution is always there. Sometimes, parents of the wife are forced to pay for certain properties. There, the property may be in husband’s name and may not amount to property held jointly by both the spouses. Thus, the provision for sharing matrimonial property which will
include husband’s property also, will be a giant step towards empowering women with precious economic rights.

The discussion of marital rights would have been incomplete without discussing the problem faced by wives trying to claim maintenance. It cannot be doubted that law provides the right to maintenance pendent lite to a wife during any proceeding under *Hindu Marriage Act, 1955*, permanent maintenance and alimony upon divorce and even under section 18 of *Hindu Adoptions and Maintenance Act 1956*. The wife first suffers hardships trying to prove that the husband has the means to pay and that she is unable to maintain herself. If she succeeds, another ordeal begins i.e. to implement the order of maintenance. Thus, at times, the expenditure she undertakes in the proceedings is more than the amount granted to her as maintenance.

The issue of marital rape forms the core of discussion pertaining to rights of a Hindu woman in marriage. For years, we have adhered to the notion of implied consent for sexual intercourse by a wife upon marriage. This ideology is in direct conflict with the notion of modern Hindu female who has an independent identity. No doubt, for a marriage sexual intercourse is important in developing the mutual bond of love and affection but it can be so only if consensual. Sometimes, women suffer acute mental and physical trauma in marriage due to forced sex. However, they cannot prosecute their husband for the same because section 375 of IPC doesn’t make it an offence unless the wife is below 15 years of age. The *Domestic Violence Act* provides a solution for this problem to some extent. It covers any act of sexual abuse under the definition of domestic violence for which a protection order which is a preventive order prohibiting a person for the complained act can be obtained from the magistrate. A person aggrieved may even claim compensation or damages for the said act. Thus the remedies are civil in nature. Only in the event of breach of protection order a person who commits the breach can be imprisoned for a period up to one year or may pay fine of Rs 20,000/-. Here also, the possibility of being fined alone exists and imprisonment is not mandatory in all cases. Thus, the Act provides no punishment for the act of domestic violence itself.

The rights of women who enter into marriage with NRI’s are also infringed as has been discussed in Chapter 3. Thus, there is a need for enacting a special NRI Matrimonial Law to cover all aspects such as abandonment of brides, divorce,
maintenance, child custody, etc. The need of the hour is enactment of a law for compulsory registration of marriage on the model suggested by the Law Commission of India like registration of births and deaths. However, the ultimate solution to end this state of confusion is to adopt the procedure for solemnization of marriage by way of registration of marriage, as provided under the Special Marriage Act, 1954.

The increasing spate of honour crimes is also a regressive trend which negatively impacts a woman’s right to enter freely into matrimonial relation of her own choice. The role of the khap panchayats has been discussed in chapter 3 in promoting and at times inciting people to commit such crimes. The Supreme Court, recently, in the case of *Bhagwan Dass v. The State*7 opined that honour killings definitely come within the category of rarest of rare cases and that time had come to stamp out such barbaric acts. The NCW and the Law Commission of India have already proposed draft legislations8 to provide punishment for this heinous crime. The Law Commission emphasizes the need to protect individual’s liberty and to control the acts of khaps by controlling the unlawful assemblies gathered for perpetrating honour related crime. The NCW on the other hand has laid more emphasis on the acts forming honour crimes. The government has proposed changes in section 300 of IPC. In my view, the proposal of NCW is better as it describes various types of acts as honour crimes. Honour killing is only one aspect of honour crimes. However, a deterrent law is a must to check the rising trend of honour crimes. If punishment is mild, whatever law is formulated, it will not have any impact. The law should also curb the growing influence of the khap panchayats which have no legal basis for their operation.

The *H.S.A. 1956*, empowers the Hindu women to acquire and possess a property as an absolute owner. *The Hindu Succession (Amendment) Act* of 2005, further strengthened her position by elevating a daughter to the status of a coparcener. However, in reality the mind set of people has not changed. The power to give the property by testamentary dispossession to the sons still remains and those females who lay claim to their share are looked down upon and shunned as insensitive towards...

7(2011) 6 SCC 396.
their brothers. The patriarchal bias in section 15 of Hindu Succession Act 1956 was left untouched. If a female dies without leaving any issue, then the source from which she acquires property becomes important. If she has inherited property from parent, it must devolve back to the parental heirs and if she inherits it from her husband or father in law, it reverts to the heirs of husband. Thus, it appears as if the concept of reversion was resurrected. Moreover, the parental heirs do not inherit the self acquired property of the female as section 15 does not talk about the mode of devolution of self acquired property. It seems quite unjust that when a male dies intestate and without leaving an issue, the source from where he acquired property does not matter. So, even if he inherits property of his wife, it never passes back to the heirs of the wife. It is interesting to note that the heir apart from her children and husband are referred to as heirs of her father or heirs of husband etc, as if she has no independent identity. The distressing aspect of our Indian legal system is that the women’s right to inherit like other rights is also observed more often in breach than in practice.

In matters of guardianship and adoption too, the Hindu law has marched ahead. Though section 6(a) of Hindu Minority and Guardianship Act 1956 is not very happily worded, regarding the guardianship rights of her children, the honourable Supreme Court in Githa Hariharan v. Reserve Bank of India⁹ elevated her to the status of natural guardian even during the lifetime of the father. Thus, the court interpreted the term ‘after him’ as the absence of the father and not after his lifetime. The Personal Law (Amendment) Act 2010 brought the much required change in the Guardians and Wards Act 1890 by making the mother the natural guardian along with father in section 19 of the Guardians and Wards Act 1890.

In the sphere of adoptions too, the legislature brought the much required change in section 8 of Hindu Adoptions and Maintenance Act dealing with the capacity of the Hindu female to adopt. Prior to the Personal Law (Amendment) Act 2010, the married Hindu female could not adopt but her husband could initiate adoption and she could consent to it. By this amendment, Hindu married female can also adopt with the consent of her husband. Only one situation may be problematic, where parties are undergoing divorce proceedings. Neither of the spouses would be

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⁹AIR 1999 SC.
In order to assess the awareness and effectiveness regarding the provisions of Hindu Law with regard to the rights of women an empirical study using the tool of questionnaire was carried out to elicit the views of the general public. From the study, it is evident that there is a general agreement among all the respondents that status of women is unequal with men. Irrespective of their educational status, the respondents are not aware of some of the rights and remedies available to women like restitution of conjugal rights. However, awareness about some other aspects like child marriage being punishable, equal property rights of daughters, failure of law to curb bigamy is high. There is also a general feeling that law is not implemented properly. It is interesting to note, that education is considered to be a parameter and mode of social change. However in certain things the view of educated strata was similar to those of illiterate sections, especially on the matter that equal property rights of women are more harmful than good. Thus, somewhere it is felt that literacy may not truly be equivalent to education in the real sense. Aspects related to women rights are strongly connected with social norms and conditioning of people which in turn is influenced by patriarchal considerations.

Apart from the Hindu Law, some other laws too, have a direct impact on the rights of Hindu Women. A discussion of these like the Dowry Prohibition Act, Protection of Women from Domestic Violence Act 2005, certain provisions under the IPC, Prenatal Diagonistic Techniques Act etc. has been taken up. The social evil of dowry may have begun as customary presents with love and affection being given at the time of marriage or because women had no right in joint family property and the father used to give some cash or kind out of love and affection. Some have also traced the origin of the evil custom to the fact that at some time, the increase in number of women as compared to men may have led to origin of dowry paid in cash or kind. Slowly, the custom became the cause of numerous deaths, wife burning, suicides being committed by harassed woman which continues unabated till date. The dowry prohibition Act 1961 has failed to act as an effective deterrent. The law commission in its 174th report has stated that granting equal rights to women in coparcenary property by birth may help In slowly warding off this social evil.
it does so, there is another curse which awaits the girl child i.e. female infanticide and foeticide which may increase owing to granting of equal rights in ancestral Property. Though, these may be assumptions but women have to be safeguarded against these heinous crimes so that they are able to enjoy their rights fruitfully.

The Pre-natal Diagnostic Techniques (Regulation and Prevention of Misuse) Act, 1994 was passed to regulate forced termination of female foetus. Moreover some provisions of the Indian Penal Code from section 312 to 318 also seek to prevent and punish causing of miscarriage, injuries to unborn children etc. However, the reality is that female foeticide is still widely prevalent. Hence law has seemed to have lost its deterrent effect in this regard. One more thing that becomes clear from the failure of law in these spheres is that the status of women in reality still remains low. Thus the equality is restricted to the letter of Law. The ground realities present a different picture. In spite of some deterrent laws, social evils prejudicial to rights of women are still prevalent. Until we get rid of these social vices, the talk of equal rights of women would remain a myth.

Another legislation which has had a positive impact on the rights of women under Hindu Law is the Family Courts Act, 1984. The said Act was enacted with a view to provide a court mechanism which would facilitate the cause of women and children and be more sensitive towards their needs. This was to be achieved by providing counselors, doing away with lawyers etc. The aim was to reduce the adversarial litigation based on blame game and to promote mutually acceptable decision to the couples including reconciliation where possible. Such an approach was praise worthy. However, despite mandatory obligation imposed upon State Governments, Family Courts had not been setup in 16 States and Union Territories till 2005\textsuperscript{10}. The family Court was setup as late as 2009 in the National Captial. Thus, in my view the Family Courts should be established in all States and Union Territories so that the matrimonial litigation can be completed speedily. The exclusion of advocates should be done away with as many times women are not aware of the legal provisions and may not be able to put forward their case properly. This may adversely affect their rights especially with regard to maintenance, custody etc.

\textsuperscript{10} Flavia Agnes, “Family Law, Vol II : Marriage, Divorce and Matrimonial Litigation”, p 272 (2011)
The Convention on Elimination of All forms of Discrimination against Women has proven to be a boon for women in India. The system of sending reports every four years has coaxed the Indian government to act in the direction of empowering women with a number of rights for which the demand was long pending. The recent report which has been discussed in the chapter on related laws gives us a glimpse of the various steps which have been taken by the Indian government. The legislations on domestic violence, equal property rights for women, steps to check female foeticide, honour killings are all a result of this convention. Thus, time is not far where India will have to match the international standards on women’s rights.

The perspective of Hindu law vis a vis the rights of Hindu women has changed over a period of time. From rigid laws and rules of the Dharamshastras to more humane and just laws in the Hindu code- to the recent trends in the form of the latest amending Acts, the journey has been long and full of ordeals nevertheless fruitful. The law to be effective has to be accepted by society. Though some rights of the women have been hailed as laudable steps, some others especially the property rights are looked upon as threat to the traditional patriarchal regime. The words of the former Chief Justice of India P.B. Gajendragadkar, in introduction to 59th Law Commission of India Report aptly describe why the perspective of law must change:

“It may sound platitudinous but is nevertheless true that revision of law is must in a dynamic society like ours, which is engaged on the adventure of creating a new social order founded on faith in the value-system of socio-economic justice enshrined in our Constitution. With the changing times, notions of fairness and justice assume newer and wider dimensions and customs and beliefs of the people change. These in turn demand changes in the structure of law; every progressive society must make a rational effort to meet these demands. Between the letter of the law and the prevailing customs and the dictates of the current value system accepted by the community, there should not be an unduly long gap.”

On the basis of the above conclusions, the following suggestions are:

8.1 Hindu Succession Act 1956: Scope for more Reforms

☐ Overlapping of heirs in class I and class II:
- Son’s daughter’s daughter. Daughter’s son’s daughter, Daughter’s daughter’s son and Daughter’s daughter’s daughter is elevated to class I but not deleted from class II.

- Son’s daughter’s son and Daughter’s son’s son are not elevated as class I heirs. They are also heirs through a female heir and their siblings are already made class I heirs. This distinction is discriminatory and without justification.

- Section 15 of H.S.A 1956 still retains the bias towards the patriarchal structure of society. Parental heirs do not inherit the self acquired property of the Hindu female. Parental heirs only inherit property acquired by a female from her father or mother. Thus there is an urgent need to bring change in the mode of devolution of self acquired property of a Hindu female to make parental heirs inherit along with heirs of the husband.

- There is a need to name the heirs of a Hindu Female on the lines of heirs of a Hindu male. The present structure of heirs marginalizes the independent identity of a Hindu female and her heirs are referred as ‘heirs of husband’, ‘heirs of father’ etc.

- Some limitation should be imposed on the power of a Hindu to dispose off his property by testamentary disposition under section 30 of Hindu Succession Act 1956.

- The aim should be to gradually abrogate the traditional coparcenary system and hence to remove the distinction between separate and joint family property.

- To avoid fragmentation of land (which may arise due to deletion of section 4(2) of HSA) a provision can be made that if a female wants to sell her share in the agriculture property the family members should be given the preferential right to but that property provided they give the best price.

8.2 The Prohibition of Child Marriage Act 2006 and The Hindu Marriage Act: Scope for more Reforms

- The minimum age for marriage should be the same for male and female. The UNCRC has defined a child as below 18. Thus, we must recognize it as the minimum legal age for marriage.
• **Child marriage** should be **void.** Making the marriage voidable will not help in prohibiting child marriage. The rigor of law should not be lost by providing ways and means of keeping child marriages alive. The provision should be same in PCMA 2006 and HMA 1956.

• **Protection of Children from Sexual Offences Act (PCSOA), 2011** makes consensual **sexual intercourse between persons below 18 years** as an offence. Thus, in light of this development, it is necessary to make **marriages below 18 years of age as void.**

• The law to punish bigamy should be more stringent.

• The offence of bigamy should be prosecuted by the State even if the wife hesitates to complaint against her husband.

• Compulsory registration of marriage should be provided by H.M.A so that it becomes a proof of valid marriage.

• **Procedure of registration** should be simplified by empowering the panchayats in the villages to register marriages.

• **Execution of maintenance decrees** should be made easier. This may be done by providing for a provision in the HMA whereby the husband may have to deposit some amount in the court as a security and if the wife is awarded maintenance, that amount should be used.

8.3 Personal law Amendment Act (2010): Scope for More Reforms

• The amendment of 2010 did not amend **section 6(a)** of H.M.G.A. Section 6 states that the mother is the natural guardian after father. The SC in Githa Hariharan v. Reserve Bank of india AIR 1999 SC 1149 interpreted the section liberally to mean that mother can be guardian if father is not present or does not perform his duties as a guardian. It seems that if father is present and performing his obligations, he will have supremacy over mother.

• Section 6(a) of H.M.G.A. should be further amended to provide that a child under the age of 12 years must preferably remain in custody of the mother, subject subject to welfare of the minor.

• As far as adoption is concerned, the complication that may arise when spouses are undergoing divorce are not thought of. In such situation, the consent of other spouse for adoption should be waived.
8.4 Marriage laws Amendment Bill (2010): Scope for more Reforms

- **Irretrievable breakdown** should be defined more clearly. Only separation of 3 years should not be the guiding factor. If introduced in present form, it may be misused by husbands.
- The proposed provision on matrimonial property provides that the court shall decide how much share is to be given.
- The husband can still wriggle out of the liability by showing that there is no property in his name.
- The legislature must fix a share for the wife in case of divorce and also clarify as to what is included in matrimonial property.
- The **six months cooling period** provided under section 13B before granting of divorce on mutual consent should be retained but it may not be mandatory in all cases. At the same time, a **proviso should be added to section 13 (2)** as per which the period may be waived by the court upon the application of one of the parties. In my opinion, it should be the discretion of the court, to be exercised keeping in view the facts and circumstances of the case to decide whether in a given situation the cooling period should be waived or not.

- Education must be imparted to create awareness regarding the rights of women under various provisions of Hindu Law and related laws. The education may include informal education also. The women organizations, NGOs, Law students can play an important role by holding seminars, workshops, street plays etc.
- Patriarchal bias needs to end by extending education to men. There is a need to bring forward men with progressive thinking who can play an important role in educating the society about the equal role of women in development of society.

In the End, there is little doubt that over the years the perspective of Hindu law has changed vis a vis the rights of women. The recent enactments have empowered the Hindu women and the goal of gender equality has been achieved to a large extent. However, the process of reform cannot be complete till the laws are effectual in
practice. No law can achieve its goal till the society accepts the changes ushered by legislation. Thus the Endeavour should be to sensitize the masses about the changing perspective of law through the role of media and education. If the above suggestions are incorporated in the law, it will go a long way in equipping the women with equal rights.

We can conclude with the words of K.T. Bhashayam Ayengar emphasizing the need to equip women with their much deserved rights and privileges:

“We must give back their rights and privileges in law of which we have robbed them. The injustices perpetrated on them in the name of law, should be remedied and as we honoured them in life, so must we make equal them to us in law then the law shall be the real reflections of life.”