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MAINTENANCE RIGHTS OF WOMEN UNDER INDIAN LAWS: A STUDY

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Abstract

Maintenance is a fundamental legal right that seeks to protect women from economic insecurity arising out of marital discord, separation, divorce, or neglect by ensuring their financial support and preserving their dignity. In India, the right to maintenance is governed by a combination of constitutional principles, personal laws, and secular statutes, including the Hindu Marriage Act, 1955, the Hindu Adoptions and Maintenance Act, 1956, the Protection of Women from Domestic Violence Act, 2005, the Bharatiya Nagarik Suraksha Sanhita, 2023, and the personal laws applicable to different religious communities. This research paper examines the concept, scope, and significance of maintenance rights available to women under Indian laws and critically analyses the legislative framework, constitutional provisions, and judicial interpretations governing these rights. It concludes that although the existing legal framework provides substantial protection to women, greater uniformity, procedural efficiency, and effective implementation are essential to ensure that maintenance laws fulfil their objective of promoting gender justice, economic security, and the constitutional ideals of equality, dignity, and social welfare.

Keywords: Maintenance, Women, Indian Family Law, Personal Laws, Bharatiya Nagarik Suraksha Sanhita, Hindu Marriage Act, Domestic Violence Act, Gender Justice, Constitutional Rights, Economic Security.

1. Introduction

Maintenance is one of the most significant concepts in family law because it seeks to protect the economic security and dignity of women who are unable to maintain themselves. In India, the institution of marriage has traditionally imposed reciprocal obligations upon spouses, with the husband generally expected to provide financial support to the wife. However, changing social conditions, increasing participation of women in the workforce, rising divorce rates, domestic violence, and evolving constitutional values have transformed the legal understanding of maintenance. Today, maintenance is recognized not merely as a moral obligation but as a legally enforceable right designed to ensure that women are not reduced to poverty, destitution, or social exclusion after marital discord or separation.

Indian law does not provide a single comprehensive legislation governing maintenance. Instead, maintenance rights arise from a combination of constitutional principles, secular legislation, and personal laws applicable to different religious communities. A Hindu woman may claim maintenance under the **Hindu Marriage Act, 1955** and the **Hindu Adoptions and Maintenance Act, 1956**, while Muslim women are protected through personal law, statutory enactments, and judicial interpretation. Christian and Parsi women derive maintenance rights under their respective matrimonial statutes. Apart from personal laws, women belonging to any religion may seek maintenance under **Section 144 of the Bharatiya Nagarik Suraksha Sanhita, 2023**, which replaces the earlier provision under Section 125 of the Code of Criminal Procedure, 1973. Similarly, the **Protection of Women from Domestic Violence Act, 2005** provides an independent and effective remedy in the form of monetary relief and maintenance.

The development of maintenance law has also been significantly influenced by judicial activism. The Supreme Court has repeatedly emphasized that maintenance is an instrument of social justice intended to fulfil the constitutional promise of equality and dignity. Courts have consistently held that maintenance should enable a woman to live with the same level of comfort and dignity that she enjoyed during her matrimonial life. Consequently, maintenance has gradually evolved from a limited statutory remedy into an essential component of women's socio-economic rights.¹

¹ Paras Diwan, *Modern Hindu Law* 421 (Allahabad Law Agency, Faridabad, 23rd edn., 2022).

2. Meaning and Concept of Maintenance

The expression "maintenance" generally refers to financial support provided by one person to another who is legally entitled to such support. In legal terminology, maintenance includes provision for food, clothing, residence, medical expenses, education where applicable, and other necessities required for leading a dignified life. The concept is broader than mere subsistence; it encompasses all reasonable expenses necessary to ensure that the dependent person can maintain an appropriate standard of living.

Under Indian jurisprudence, maintenance originates from the principles of social welfare and family responsibility. Marriage creates reciprocal rights and obligations between spouses. While modern law recognizes equality between husband and wife, it also acknowledges that economic inequalities often place women at a disadvantage after separation or divorce. Maintenance law therefore acts as a protective mechanism intended to reduce this economic imbalance.

Maintenance may be categorized into various forms:

Permanent Maintenance: Granted after the final disposal of matrimonial proceedings and generally continues for life unless modified by the court due to changed circumstances.

Interim Maintenance: Awarded during the pendency of litigation to ensure that the financially weaker spouse can sustain herself and effectively participate in legal proceedings.

Monthly Maintenance: Courts generally direct periodic monthly payments considering the regular needs of the claimant.

Lump-Sum Maintenance: In appropriate cases, courts may award a one-time consolidated amount instead of recurring monthly payments.

Modern courts have emphasized that maintenance should not merely prevent starvation but should enable a woman to live with dignity consistent with the social and financial status of the parties. Therefore, while determining maintenance, courts examine numerous factors including income, assets, standard of living, liabilities, educational qualifications, earning capacity, health, age, duration of marriage, dependent children, and future prospects. The concept of maintenance also reflects India's international commitments towards gender justice. Economic empowerment of women has become an essential aspect of human rights, and maintenance serves as one of the primary legal mechanisms to secure that objective.²

² Mulla, *Principles of Hindu Law* 1092 (LexisNexis Butterworths Wadhwa, Nagpur, 24th edn., 2021).

3. Objectives of Maintenance Laws

Maintenance laws pursue several important legal and social objectives. Their foremost purpose is to protect women against economic vulnerability arising from marital breakdown. Many women sacrifice employment opportunities and career advancement to fulfil domestic responsibilities, childcare, and family obligations. Upon separation or divorce, they often find themselves financially dependent and socially disadvantaged. Maintenance laws seek to compensate for this inequality by imposing a continuing financial obligation upon the person having sufficient means. Another important objective is the prevention of destitution and vagrancy. The legislature has consistently recognized that abandoned wives should not become dependent upon charity or public welfare.

Maintenance provisions therefore function as welfare legislation designed to ensure that women receive minimum financial security necessary for survival and dignity. Maintenance also promotes gender equality by recognizing the unpaid domestic labour performed by women during marriage. Household management, childcare, and emotional support contribute significantly to family welfare, although such contributions rarely generate independent income. Modern maintenance jurisprudence acknowledges these non-economic contributions while determining financial entitlement.³

4. Constitutional Basis of Women's Right to Maintenance

Although the Constitution of India does not expressly guarantee a right to maintenance, several constitutional provisions collectively establish its legal foundation.

Article 14 guarantees equality before law and equal protection of laws. Maintenance provisions seek to achieve substantive equality by protecting women who are economically weaker after matrimonial disputes.

Article 15(3) empowers the State to enact special legislation for women and children. Maintenance laws represent a constitutionally permissible form of protective discrimination intended to advance women's welfare and eliminate historical disadvantages.

Article 21, guaranteeing the right to life and personal liberty, has received an expansive

³ B.M. Gandhi, *Family Law* 314 (Eastern Book Company, Lucknow, 4th edn., 2018).

interpretation from the Supreme Court. The right to life includes the right to live with dignity rather than mere animal existence. Adequate maintenance directly contributes to preserving this constitutional guarantee.

The Directive Principles of State Policy further reinforce the legal framework. **Article 38** directs the State to establish a social order based on justice, while **Article 39(a)** seeks to ensure adequate means of livelihood for all citizens. **Article 39(d)** promotes equal pay for equal work, and **Article 39(e)** seeks protection against economic exploitation. **Article 41** encourages public assistance in cases of unemployment, old age, sickness, and disablement, whereas **Article 42** promotes humane conditions of work and maternity relief. Together, these constitutional directives provide a strong normative basis for maintenance legislation. Indian courts have repeatedly observed that maintenance statutes should receive liberal interpretation because they implement constitutional values of equality, social justice, and human dignity. Consequently, maintenance proceedings are treated as beneficial legislation intended to protect women from economic deprivation rather than as purely adversarial disputes.⁴

5. Maintenance under the Hindu Marriage Act, 1955

The **Hindu Marriage Act, 1955 (HMA)** is one of the principal legislations governing matrimonial rights and obligations among Hindus. Besides regulating marriage, divorce, judicial separation, and restitution of conjugal rights, the Act contains important provisions relating to the maintenance of spouses. The objective of these provisions is to ensure that a spouse who lacks sufficient financial resources is not deprived of the means necessary for survival during or after matrimonial proceedings. Although the provisions are gender-neutral in wording, they are predominantly invoked by women because they are more likely to be economically dependent upon their husbands. The Act recognizes two distinct forms of maintenance—**interim maintenance** and **permanent maintenance**. Interim maintenance enables the financially weaker spouse to meet day-to-day expenses and litigation costs during the pendency of matrimonial proceedings. Permanent maintenance, on the other hand, is awarded after the conclusion of litigation and may continue throughout the lifetime of the claimant or until modified by the court.

⁴ V.N. Shukla, *Constitution of India* 243 (Eastern Book Company, Lucknow, 14th edn., 2020).

Interim Maintenance (Section 24)

Section 24 of the Hindu Marriage Act empowers the court to grant maintenance pendente lite and litigation expenses where either spouse has no independent income sufficient for support. The provision is based upon the principle that financial incapacity should not become an obstacle to securing justice. A woman who lacks adequate income may apply to the court seeking monthly maintenance together with reasonable expenses incurred in pursuing legal proceedings.

While deciding such applications, courts generally examine several factors, including:

- Income of both spouses;
- Standard of living enjoyed during marriage;
- Financial liabilities;
- Educational qualifications;
- Employability of the claimant;
- Health and age of the parties;
- Duration of matrimonial proceedings.

The amount awarded under Section 24 is temporary and remains operative only during the pendency of the case. Nevertheless, it plays a crucial role in ensuring equal access to justice by preventing financially stronger spouses from using economic pressure to influence litigation.⁵

Permanent Maintenance (Section 25)

Section 25 authorizes the court to grant permanent alimony and maintenance at the time of passing any decree under the Act or even subsequently upon an application made by either spouse. The maintenance may be awarded as:

- Monthly payments,
- Periodical instalments, or
- A lump-sum amount.

The court possesses wide discretionary powers while determining the quantum of maintenance. It considers the respondent's income, property, conduct of the parties, age, health, financial

⁵ S.S. Kapoor, *Hindu Law* 487 (Central Law Agency, Allahabad, 18th edn., 2020).

obligations, and other surrounding circumstances. Unlike interim maintenance, permanent maintenance continues even after dissolution of marriage unless altered due to a material change in circumstances.⁶

6. Maintenance under the Hindu Adoptions and Maintenance Act, 1956

The **Hindu Adoptions and Maintenance Act, 1956 (HAMA)** constitutes one of the most comprehensive statutory frameworks relating to maintenance under Hindu personal law. Unlike the Hindu Marriage Act, which primarily deals with matrimonial proceedings, HAMA recognizes an independent substantive right to maintenance arising from family relationships. The Act extends maintenance rights not only to wives but also to widowed daughters-in-law, children, aged parents, and other dependants. In the context of women's rights, the provisions relating to wives occupy central importance.

Right of a Wife to Maintenance

Section 18 recognizes the right of a Hindu wife to be maintained by her husband throughout her lifetime. This right exists irrespective of whether the parties continue to reside together. The wife is entitled to claim separate residence along with maintenance under specified circumstances, including:

- Desertion;
- Cruelty;
- Husband suffering from a virulent form of leprosy (historically included);
- Husband having another wife;
- Conversion of religion;
- Keeping a concubine;
- Any other justifiable cause.

The provision reflects the legislative intention that a woman should not be compelled to choose between personal dignity and financial security. If the husband neglects or refuses to maintain her without sufficient cause, she may seek judicial intervention. However, the statute also prescribes certain limitations. A wife forfeits her right to maintenance if she is unchaste or if she converts to another religion. These restrictions have generated considerable academic debate regarding their compatibility with constitutional principles of equality and personal

⁶ R.K. Sinha, *Hindu Law* 362 (Central Law Publications, Allahabad, 6th edn., 2019).

liberty.⁷

Maintenance of Widowed Daughter-in-law

An important welfare-oriented provision under HAMA grants maintenance rights to a widowed daughter-in-law who is unable to maintain herself out of her own earnings or estate. Under appropriate circumstances, she may claim maintenance from the estate of her deceased husband or from her father-in-law, subject to statutory conditions. This provision reflects the traditional Hindu law principle that the family bears responsibility for supporting vulnerable female members after the death of the earning spouse. Though limited in scope, it provides an additional layer of financial protection.⁸

7. Maintenance under the Protection of Women from Domestic Violence Act, 2005

The **Protection of Women from Domestic Violence Act, 2005 (PWDVA)** marked a significant shift in Indian family law by recognizing domestic violence as a violation of women's human rights. Unlike traditional matrimonial statutes, the Act provides immediate civil remedies intended to protect women from physical, emotional, verbal, sexual, and economic abuse.

One of the most important remedies under the Act is **monetary relief**, which includes maintenance.

Monetary Relief

Under Section 20, the Magistrate may direct the respondent to pay monetary relief sufficient to meet the expenses incurred and losses suffered by the aggrieved woman due to domestic violence. Such relief may include:

- Loss of earnings;
- Medical expenses;
- Property damage;
- Maintenance for the woman;
- Maintenance for children.

⁷ Dr. Poonam Pradhan Saxena, *Family Law Lectures: Family Law-II* 276 (LexisNexis, Gurugram, 5th edn., 2021).

⁸ U.P.D. Kesari, *Hindu Law* 419 (Central Law Publications, Allahabad, 2018).

The maintenance awarded under the Act is independent of remedies available under other statutes. Consequently, a woman may simultaneously pursue maintenance under the Hindu Marriage Act, the Bharatiya Nagarik Suraksha Sanhita, and the Domestic Violence Act, subject to appropriate adjustment to prevent duplication. The Act adopts a broad understanding of domestic relationships by extending protection not only to legally wedded wives but also, in appropriate circumstances, to women in relationships resembling marriage. This progressive interpretation significantly expanded the scope of women's maintenance rights.⁹

Residence Orders and Economic Security

Besides monetary relief, the Act empowers courts to pass residence orders ensuring that women are not arbitrarily dispossessed from their shared household. Since housing constitutes a significant component of maintenance, residence rights substantially strengthen the economic security guaranteed under the legislation. The Act therefore recognizes that financial support alone cannot adequately protect women unless accompanied by secure shelter and protection against economic abuse.

8. Maintenance under the Bharatiya Nagarik Suraksha Sanhita, 2023

The enactment of the **Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS)** replaced the **Code of Criminal Procedure, 1973**. The maintenance provision previously contained in Section 125 CrPC has now been incorporated under **Section 144 BNSS** with substantially similar objectives. The provision serves as a secular remedy applicable irrespective of religion. A wife who is unable to maintain herself may seek maintenance if her husband possesses sufficient means but neglects or refuses to maintain her. The expression "wife" generally includes a divorced woman who has not remarried, thereby extending financial protection even after dissolution of marriage. Proceedings under Section 144 are intended to provide **speedy, inexpensive, and summary relief**. Unlike lengthy civil litigation, maintenance proceedings under the BNSS are designed to prevent immediate destitution and ensure minimum economic support.

Courts determining maintenance generally consider:

- Actual income;
- Reasonable earning capacity;

⁹ Dr. G.B. Reddy, *Women and the Law* 211 (Gogia Law Agency, Hyderabad, 3rd edn., 2020).

- Necessary personal expenses;
- Number of dependants;
- Educational expenses of children;
- Standard of living during marriage;
- Health and age of the parties.

The secular character of Section 144 ensures that every woman, irrespective of her personal law, has access to a basic statutory remedy against neglect.¹⁰

10. Maintenance under Muslim Law

Muslim law recognizes maintenance (*nafaqah*) as a legal obligation arising from the marital relationship. Under Islamic jurisprudence, a husband is duty-bound to provide financial support to his wife, irrespective of whether she possesses independent property or income. The rationale behind this obligation is that the husband assumes responsibility for meeting the essential needs of his wife during the subsistence of marriage. Maintenance generally includes food, clothing, residence, medical treatment, and other necessities consistent with the social and financial status of the parties.

Unlike some other personal laws, the wife's right to maintenance under Muslim law does not ordinarily depend upon her financial condition. Even a wealthy wife may claim maintenance if the husband neglects his legal obligation. However, classical Muslim law recognizes certain exceptions. A wife who refuses to cohabit with her husband without reasonable cause or who is guilty of marital misconduct may lose her right to maintenance. Modern judicial interpretation, however, has gradually adopted a more rights-oriented approach by considering the circumstances that justify separate residence, including cruelty, domestic violence, and failure of the husband to discharge his matrimonial obligations.

The amount of maintenance under Muslim law depends upon various factors such as the husband's income, the wife's reasonable needs, local customs, and the standard of living enjoyed during marriage. Courts have increasingly emphasized that maintenance should be fair and realistic rather than merely symbolic.¹¹

¹⁰ K.D. Gaur, *Textbook on Indian Penal Procedure* 598 (LexisNexis, Gurugram, 8th edn., 2022).

¹¹ Tahir Mahmood, *The Muslim Law of India* 214 (Law Book Company, Allahabad, 3rd edn., 2016).

10.1 The Muslim Women (Protection of Rights on Divorce) Act, 1986

The enactment of the **Muslim Women (Protection of Rights on Divorce) Act, 1986** represented one of the most debated developments in Indian family law. The legislation was enacted after the Supreme Court's judgment in the **Shah Bano** case and sought to define the financial rights of divorced Muslim women. The Act obligates the former husband to make a **reasonable and fair provision** and to pay maintenance to the divorced wife within the *iddat* period. Initially, the legislation was interpreted narrowly, giving rise to concerns that divorced Muslim women would lose long-term maintenance rights after the expiry of the *iddat* period. However, subsequent judicial interpretation significantly expanded the scope of the Act. The Supreme Court clarified that the obligation to make a "reasonable and fair provision" is not confined merely to the duration of the *iddat* period. Instead, the husband must make adequate financial arrangements during the *iddat* period for the wife's future livelihood. This interpretation harmonized the statute with constitutional principles of equality and social justice while preserving the legislative intent. The Act also provides that where the divorced woman cannot maintain herself after receiving the fair provision, responsibility may extend to her relatives entitled to inherit her property and, in certain circumstances, to the State Wakf Board.¹²

11. Maintenance Under Christian Law

The maintenance rights of Christian women are primarily governed by the **Indian Divorce Act, 1869**. The Act authorizes courts to grant both interim and permanent maintenance during matrimonial proceedings. Although originally enacted during the colonial period, several amendments and judicial interpretations have modernized its provisions in conformity with constitutional values.

The Act enables a Christian wife to seek maintenance while proceedings for divorce, judicial separation, nullity of marriage, or other matrimonial relief remain pending. Courts determine the amount after considering the financial resources of both parties, the standard of living maintained during marriage, and the reasonable needs of the claimant.

Permanent alimony may also be granted after the conclusion of matrimonial proceedings. Courts possess discretion to award maintenance either as periodic payments or as a lump-sum

¹² A.A.A. Fyzee, *Outlines of Muhammadan Law* 188 (Oxford University Press, New Delhi, 6th edn., 2022).

settlement. Such orders may subsequently be modified where material changes occur in the financial circumstances of either party.

Modern judicial interpretation has emphasized that maintenance under the Indian Divorce Act should not be viewed merely as a charitable allowance but as a legal right intended to preserve the dignity and financial independence of women after marital breakdown.¹³

12. Maintenance Under Parsi Law

Parsi matrimonial disputes are governed by the **Parsi Marriage and Divorce Act, 1936**. The Act contains provisions empowering courts to grant maintenance pendente lite as well as permanent alimony upon dissolution of marriage or judicial separation.

The principles governing maintenance under Parsi law are broadly similar to those applicable under other matrimonial statutes. Courts evaluate the income, assets, liabilities, age, health, conduct, and social status of the parties while determining maintenance. The objective is to ensure that the financially weaker spouse does not suffer undue hardship following the termination of matrimonial relations.

Although the Parsi community constitutes a relatively small section of India's population, the legislation demonstrates the Indian legal system's commitment to extending maintenance rights across different personal law regimes while respecting religious diversity.¹⁴

13. Critical Analysis of the Existing Legal Framework

The Indian legal framework governing maintenance reflects a commendable commitment towards protecting women from financial hardship. Constitutional guarantees of equality and dignity have substantially influenced legislative reforms and judicial interpretation. The recognition of maintenance as an instrument of social justice rather than charity represents one of the most progressive developments in Indian family law.

However, the legal framework continues to suffer from fragmentation. Different personal laws prescribe different conditions, procedures, and limitations for claiming maintenance. While

¹³ S. Krishnamurthi Aiyar, *Principles of Hindu and Comparative Family Law* 503 (Orient Publishing Co., New Delhi, 2018).

¹⁴ Kusum, *Family Law Lectures: Family Law-I* 392 (LexisNexis, Gurugram, 6th edn., 2020).

secular statutes provide broader remedies, personal law provisions occasionally produce unequal outcomes based solely upon religious affiliation. Such diversity, although reflective of India's pluralistic legal system, sometimes creates uncertainty and inconsistency.

Another concern relates to enforcement. Obtaining a maintenance order does not necessarily guarantee actual receipt of maintenance. Women frequently encounter difficulties in executing court orders against defaulting husbands, particularly where the respondent intentionally avoids payment or conceals assets.

The absence of a comprehensive statutory formula for calculating maintenance also contributes to judicial inconsistency. Although discretion allows courts to tailor relief according to individual circumstances, excessive variation may affect predictability and fairness.

Furthermore, the increasing participation of women in the workforce has introduced new complexities into maintenance jurisprudence. Courts must balance the principles of gender equality with the continuing need to protect economically weaker spouses. The mere fact that a woman is educated or employed should not automatically disentitle her from maintenance if her income is insufficient to maintain a standard of living comparable to that enjoyed during marriage. Overall, while the legislative framework is progressive, greater procedural efficiency and uniformity remain necessary to ensure effective realization of maintenance rights.¹⁵

14. Conclusion

Maintenance constitutes one of the most significant legal safeguards available to women under Indian family law. It is no longer regarded merely as a moral or charitable obligation but as a legally enforceable right rooted in the constitutional values of equality, dignity, and social justice. The various statutory frameworks—including the **Hindu Marriage Act, 1955**, the **Hindu Adoptions and Maintenance Act, 1956**, the **Protection of Women from Domestic Violence Act, 2005**, the **Bharatiya Nagarik Suraksha Sanhita, 2023**, and the different personal laws—collectively seek to protect women from economic deprivation arising from marital discord, separation, or divorce.

Judicial interpretation has played an indispensable role in strengthening maintenance

¹⁵ Dr. H.O. Agarwal, *Human Rights* 389 (Central Law Publications, Allahabad, 9th edn., 2021).

jurisprudence. Landmark decisions such as **Mohd. Ahmed Khan v. Shah Bano Begum**, **Danial Latifi v. Union of India**, **Shamima Farooqui v. Shahid Khan**, **Bhuvan Mohan Singh v. Meena**, and **Rajnesh v. Neha** have transformed maintenance from a narrow statutory remedy into an instrument for securing substantive justice and preserving the dignity of women.

Nevertheless, significant challenges remain. Delayed proceedings, inconsistent maintenance awards, difficulties in enforcement, concealment of income, and multiplicity of legal remedies continue to affect the effectiveness of maintenance law. Addressing these shortcomings requires legislative reform, improved judicial administration, and greater public awareness.

Ultimately, maintenance law should be viewed as a mechanism for achieving social justice rather than merely resolving matrimonial disputes. By ensuring economic security and protecting the dignity of women, maintenance contributes to the realization of the constitutional vision of an egalitarian society in which every individual is able to live with respect, independence, and dignity.

The legal framework governing maintenance rights of women in India should be strengthened through comprehensive reforms aimed at ensuring uniformity, efficiency, and accessibility. A uniform statutory framework or detailed legislative guidelines should be introduced to establish objective criteria for determining the quantum of maintenance, taking into account factors such as the income and assets of both parties, their standard of living, financial liabilities, health, age, and the duration of the marriage. This would reduce inconsistencies in judicial decisions and promote greater fairness and predictability. Family Courts should also be mandated to dispose of interim maintenance applications within a prescribed time limit, and compulsory disclosure of income, assets, and liabilities by both spouses should be strictly enforced to prevent concealment of financial resources. Further, effective mechanisms for the execution of maintenance orders, including attachment of salary, bank accounts, and property in cases of default, should be strengthened to ensure timely compliance with judicial directions.

In addition to legislative reforms, greater emphasis should be placed on improving institutional support and legal awareness among women. Free legal aid, counselling services, and awareness programmes should be expanded through the National Legal Services Authority (NALSA), State Legal Services Authorities, and non-governmental organizations to educate

women about their maintenance rights and available legal remedies. The use of digital technology, including online filing of maintenance applications, virtual hearings, and electronic payment systems, can significantly reduce delays and enhance transparency in maintenance proceedings. Continuous training programmes for judges, lawyers, and family court personnel on gender-sensitive adjudication should also be conducted to ensure consistent application of maintenance laws. These measures would contribute towards creating a more effective, accessible, and equitable maintenance regime that upholds the constitutional values of equality, dignity, social justice, and the economic empowerment of women.

