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BEHIND CLOSED DOORS: DECODING INDIA'S LEGAL RESPONSE TO DOMESTIC VIOLENCE AND PROTECTION MECHANISMS

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ABSTRACT

In India, over 26% of women face domestic violence, but they never stand up for their rights and stay hidden inside home because society sees this matter as a family issue, not a legal issue in which state can interfere. This paper examines whether Indian law actually supports, protects these women from this inhumane conditions or this law only looks good on paper not in practice.

This paper majorly revolves around in examining the Protection of Domestic Violence Act, 2005(PWDVA) – a law that was supposed to change the real world. Before this act took place, women had very limited options – Section 498A is a criminal provision, which could punish the abusers, but it offered nothing to rebuild lives of survivors. When PWDVA stepped in took a completely different approach. It recognizes that violence isn't just physical harm – it is also emotional abuse, financial control, and sexual coercion. The PWDVA didn't just punish abusers – it protected survivors and gave them the immediate relief. Women could now demand protection orders, secure their homes. Claim financial support, and get custody of their children – all while waiting for years for a criminal case to conclude.

The PWDVA looks good on paper, but it's not working in real – life practice. Most women don't even know that there is an act related to violence, especially in villages. Protection officers are missing or untrained. Shelters don't function. Moreover, people still believe that it is the private matter. This paper looks PWDVA, court judgments, and ground reality, which is presented through data: we have good laws but poor action. The study shows that Domestic Violence isn't a private issue. It's a public crisis, our laws need to actually work to reach to the each and every women suffering behind closed doors.

KEYWORDS

Domestic Violence, PWDVA 2005, Section 498A, Women's Rights, Judicial Interpretation, Implementation challenges

INTRODUCTION

The constitution lays down a powerful vision of equality, respect, freedom, and dignity for every citizen, yet the journey from the principle to practice is far from complete. More than one in four women of aged 18 to 49 have suffered from Domestic Violence. According to the National Family Health Survey (NFHS-5), the prevalence of domestic violence against women in India from 2019- 2021 was “26.21%”.¹ (Manna et al., 2024) This alarming data really highlights that domestic violence is not a small issue but it should be considered as a widespread social concern. Cases related to domestic violence often dismissed as a ‘private matter’- such violence remains concealed behind closed doors, silence, stigma and social pressure, which makes it more difficult for women to address.

Since domestic violence is marked as a deeply entrenched issue, leave lasting psychological and emotional scars on its victims. It is also referred to as “Domestic Abuse”, “intimate partner violence”, which constitutes a pattern of behavior deliberately employed by one partner to establish and maintain power and control over another within in an intimate partner relationship.²

What makes this situation particularly difficult to address is that domestic violence does not discriminate. Just as the society in which we live remains divided across lines of age, race, gender, sexual orientation, faith, and socioeconomic class, domestic violence does not leave anyone apart from these very divisions, thus making it a universal reality that touches every corner of homes- of the wealthy and the poor, the educated and the uneducated, the young and old alike..

For years, what happened inside a home, which is surrounded with four walls, was seen as something personal-something outsiders, even the law doesn't have powers to interfere with. After so many years, India began to recognize that such hidden or unseen violence which was considered as a private matter could no longer be ignored, as it needs to get proper attention and protection. Though the legislative response of India has been slow, it shows an important, remarkable step towards recognizing and addressing these issues. This remarkable step can be seen as an important legislative turning points and continuous battles.

Prior to 1983, victims had to rely on general provisions of the IPC (Indian Penal Code) dealing with assault, grievous hurt, murder, abatement to suicide, wrongful confinement. To address

¹ Manna, S., Singh, D., Barik, M. *et al.* Prevalence of intimate partner violence among Indian women and their determinants: a cross-sectional study from national family health survey – 5. *BMC Women's Health* **24**, 363 (2024). <https://doi.org/10.1186/s12905-024-03204-x>

² United Nations. (n.d.). What is domestic abuse?. United Nations. <https://www.un.org/en/coronavirus/what-isdomestic-abuse>

this long – standing painful reality that pushed the legislature to finally steps in, The IPC (INDIAN PENAL CODE) (Act 45 of 1860) which was amended in 1983, giving birth to the section 498A into existence by classifying matrimonial cruelty as a cognizable, non- bailable, and non – compoundable³. Recognizing the remaining gaps led to the enactment of the protection of women from Domestic Violence Act, 2005(PWDA) came into force on 26th October 2006. This was the first time in India, where a civil law, which went beyond punishment and ultimately focuses on the rights of women protection -offering the women to, rebuilt the life as a survivor not as a victim⁴. Every year thousands of women in India suffers from violence and turn towards the law for protection from violence within their own closed doors- this paper works upon whether the law truly powerful and shows up for them. It looks closely at how India has legally responded to the problem of Domestic Violence, placing Protection of Women from Domestic Violence Act, 2005 sitting at the heart of this paper and the protective mechanisms for survivors.

This paper walks through the history of how domestic violence laws developed in India, breaks down the important provisions of PWDA, evaluates the difficulty that have come in the way of putting this law into practice. The research methodology used in this paper is doctrinal legal methodology, drawing primarily relying on PWDA 2005, the IPC, Supreme Court and High Court judgments, NFHS, while also engaging with secondary materials including journals, academic papers. The paper ultimately argues on implementation from paper to practice.

HISTORICAL EVOLUTION OF DOMESTIC VIOLENCE IN INDIA

Before 1983, Indian law overlooked violence within household work, treating it as a private sphere of family life rather than the legal concern. If victim wanted legal help, she had to rely on general provisions of Indian Penal Code on assault, grievous hurt, wrongful confinement, or abetment to suicide. These laws were never designed by taking domestic abuse in mind. They did not fit the reality of a women living with daily cruelty, control, fear, violent households.⁵

That gap pushed the legislature to act. Section 498A, added to the IPC in 1983, was the first

³ Gajmer, P., & Tyagi, S. (2025, July 23). Domestic violence: An overview of SEC 498a IPC- a case report - Indian J forensic community med. Indian Journal of Forensic and Community Medicine. <https://doi.org/10.18231/j.ijfcm.2021.011>

⁴ Kumari, M. (2025, July 27). Domestic violence and legal recourse: A study of the protection of women from Domestic Violence Act, 2005. IJFMR - International Journal For Multidisciplinary Research. <https://doi.org/10.36948/ijfmr.2025.v07i04.52188>

⁵ Carpenter, D., & Vauquiline, P. (n.d.). Protecting women from domestic violence in Assam, India? evaluating section 498-A, the indian penal code (IPC), 1983 vs the protection of women from Domestic Violence Act (PWDVA), 2005. Virtual Commons - Bridgewater State University. <https://vc.bridgew.edu/jiws/vol18/iss1/10/>

time the law actually recognized that a husband or his family or close relatives could be held criminally responsible for cruelty. What made this law truly powerful is its three features, which gave the real voice for women- Being **Cognizable**; the police gained the power to control to act swiftly without waiting for court order. Being **Non- Bailable** made it harder for the accused to walk free immediately. Being **Non- Compoundable** ensured that no amount of family pressure or private settlements could bury the matter before the justice was served.⁶ It was not perfect law, but for women who had nothing before this, it was a real step forward.

Women's groups did not stop after 498A. They kept pushing because punishment alone could not rebuild a woman's life- to live the life freely she needed protection, stability, and a bright future, which she can face without any intimidation. The Protection of Women from Domestic Violence Act, 2005 (**PWDVA**), which came into force in October 26, 2006 stepped into to fill those gaps. The working of law was very different in approach. It shifted the focus from the accused to survivor, this was the first time where survivor could walk into the court and ask for an order to stop the abuse, secure her place in the home she had lived in, same respect in the society which she had previous, receive financial support.⁷ This act broadened the definition of abuse by including more than just physical violence. It admits that abuse can take many forms, such as financial control, verbal harm, sexual coercion, and emotional suffering. The law recognized all these forms as violence and stated that each of them deserves legal protection and action.⁷

The legal journey of domestic violence from paper to practice in India has been a long one- from relying on broad criminal provisions to a more nuanced civil framework, which is specially designed to address the realities of violence within the closed doors. Still the question arises not on the construction statutes but its delivery- whether it reaches those it was designed to serve.

A CLOSER LOOK AT THE PROTECTION OF WOMEN FROM DOMESTIC VIOLENCE ACT, 2005

The home in most legal system has always been considered a personal space. The state does not interfere in what happens in between four walls unless something extremely serious forces

⁶ Gajmer, P., & Tyagi, S. (2025a, July 23). Domestic violence: An overview of SEC 498a IPC- a case report - Indian J forensic community med. Indian Journal of Forensic and Community Medicine. <https://ijfcm.org/archive/volume/8/issue/1/article/14571>

⁷ The protection of women from Domestic Violence Act, 2005 -. (n.d.-a). https://www.indiacode.nic.in/bitstream/123456789/15436/1/protection_of_women_from_domestic_violence_act_2005.pdf

the state to steps in. For years, Indian law operated on this understanding. When violence happened inside a marriage, the law's answer was simple: treat it as a crime, write down the complaint, name the offence, and try to punish the person.

Punishment alone cannot fully capture what domestic violence really is. It is not just a single, isolated incident, but also often a serious and ongoing pattern of harm.

The Protection of Women from Domestic Violence Act, 2005 changed this mindset of Indian legal system. It not only recognized domestic violence as a serious issue but also provided a comprehensive legal definition to it.

According to section 3 of PWDVA, 2005:

“For the purposes of this Act, any act, omission or commission or conduct of the respondent shall constitute domestic violence in case it

- a) harms or injures or endangers the health, safety, life, limb or well-being, whether mental or physical, of the aggrieved person or tends to do so and includes causing physical abuse, sexual abuse, verbal and emotional abuse and economic abuse; or
- b) harasses, harms, injures or endangers the aggrieved person with a view to coerce her or any other person related to her to meet any unlawful demand for any dowry or other property or valuable security; or
- c) has the effect of threatening the aggrieved person or any person related to her by any conduct mentioned in clause (a) or clause (b); or
- d) otherwise injures or causes harm, whether physical or mental, to the aggrieved person”.⁸

In simple words, domestic violence is not only about physical violence. It is about that hurts a women, controls her, frightens her, or takes away her basic fundamental rights and dignity to live inside their own house.

This understanding of violence forms the foundation stone of everything that act stands for. The act covers five kinds of domestic violence: physical, sexual, verbal, emotional, and economic. by covering all five, it made sure that no form of suffering inside a home could be set aside or ignored. The PWDVA, 2005 is not limited only to legally married women, but it also extends to the women who are in relationships that looks and works like a marriage; it also covers the protection to women who are sisters, widows or mothers⁹. This criterion makes the law more practical and realistic for Indian family life, as it recognizes the changing social structure according to the ongoing modern world where not all relationships are formalized

⁸ Section 3 in the protection of women from Domestic Violence Act, 2005. (n.d.-d). <https://indiankanoon.org/doc/406908/>

⁹ Kalyani, V. (2013). Protection of Women from Domestic Violence Act, 2005: A Critical Appraisal.

through marriage. In India, many women live in relationships that are considered as marriage in every practical way but they don't have marriage certificate in their hand, so they are overlooked and ignored and women in such situations always been the most vulnerable. The Act finally brought them inside the circle of legal protection, it acknowledges that violence can exist in every corner and therefore protection should not be restricted by technical definitions of marriage.

What makes this act genuinely useful is it gives a woman a real voice to stand in the society where she lives. Now a woman does not have to wait for a criminal trial to finish its proceedings before she gets any help, because if abuse is allowed to continue, it rarely stops on its own, and the Act provides her with concrete tools to protect herself- she can ask for the protection order which tells the abuser to stop- legally and formally, she can ask for a residence order so that she is not left homeless, regardless of whose name is on the paper, she can claim money for her treatment, her household, and her personal maintenance. If children are involved, she can ask for the temporary custody of her child while the case is still going on. All of this remedy adds up to something important which old law never did- they look at what the woman needs in present and future. That paradigm shift in thinking is what makes the PWDVA different from everything that came before it¹⁰.

The Act also draws its strength from the most important promises that the Indian Constitution has made to every person living within its borders. Article 14 guarantees Right to Equality. Article 15 protects against Discrimination. Article 21 gives every person the Right to Live with Dignity. The law connected domestic violence directly to these rights. This is because domestic violence is not a small dispute. It is a direct attack on the fundamental rights of a woman as a citizen of this country, which makes it clear that it is not a private matter but a public and legal responsibility.¹¹¹²

¹⁰ The protection of women from Domestic Violence Act, 2005 . (n.d.-a). https://www.indiacode.nic.in/bitstream/123456789/15436/1/protection_of_women_from_domestic_violence_act_2005.pdf

¹¹ VisionIAS. (2025, October 8). Protection of women from Domestic Violence Act (PWDVA), 2005: Current affairs: Vision IAS. Current Affairs | Vision IAS. <https://visionias.in/current-affairs/monthly-magazine/2025-1004/social-issues/protection-of-women-from-domestic-violence-act-pwdva-2005>

¹² Kumari, M. (2025a, July 27). Domestic violence and legal recourse: A study of the protection of women from Domestic Violence Act, 2005. IJFMR. <https://www.ijfmr.com/research-paper.php?id=52188>

JUDICIAL INTERPRETATION AND APPLICATION OF THE PWDVA, 2005

Courts do not just apply laws – they give them the real to each citizens. The PWDVA set out strong rights and remedies given to the women on paper, but it depends on the courts what those words actually meant when a woman walked into the court for help in real situations. That journey which started from statutes to courtroom to finally accomplishing real outcomes – is what judicial interpretation is all about.

Long before the act appeared, the Supreme Court was already thinking beyond physical violence. As far back as 1987, the Supreme Court in *Shobha Rani vs. Madhukar Reddi*¹³, the Court ruled that a husband who constantly harasses his wife for dowry amounts to cruelty, even when there is no physical harm involved – is still considered as cruelty in the eyes of law.

Thus, the importance of this judgment lies in what the Court acknowledged something society had long been ignored – that emotional quotient and economic abuse that destroys a woman just as much as physical violence does but the law had not acknowledged it yet. Divorce remained the only relief the women can get, this ends the married life of the women after this women only have to figure it out everything else on her own. No protection, no home, no maintenance – just an exit.

This exit gap had been filled by PWDVA. Earlier laws would wait for the violence to take place and then try to punish it. This act works on the principle – do not wait, act now. This principle gave women faster relief and immediate civil remedies – the protection orders, residence rights, and maintenance that a court could grant without dragging a woman to lengthy criminal trial. Research describes the act purpose clearly: it gives her right to live in a violence- free home and gives her a way to enforce these rights¹⁴ But, turning this into reality the courts have to answer a very basic and uncomfortable question – who stays and who leaves the house? That single question has many opinions and it has been perceived differently by different courtrooms because the answer decides whether a woman sleeps peacefully and safely under a roof that night or is pushed out onto the street with nothing.

The court adopted the same approach by reading the law practically rather than rigidly when it came to the issue of maintenance. In *Savitri vs. Govind Singh(1985)*¹⁵, the Supreme Court held

¹³ Shobha Rani vs Madhukar Reddi on 12 November, 1987. (n.d.-e). <https://indiankanoon.org/doc/1100461/>.

¹⁴ The protection of women from Domestic Violence Act, 2005 _ (n.d.-a). https://www.indiacode.nic.in/bitstream/123456789/15436/1/protection_of_women_from_domestic_violence_act_2_005.pdf

¹⁵ Savitri w/O Shri Govind Singh Rawat vs Shri Govind Singh Rawat on 9 October, 1985. (n.d.-e). <https://indiankanoon.org/doc/1194071/>

that a Magistrate can grant interim maintenance even if the law does not expressly provide for it, because the whole point of the provision is to make sure a woman and her children are supported. That reasoning of the court found its way into PWDVA cases too. Judges understood that justice delayed in the matters of survival of women is altogether justice denied because dragging a woman for years for basic financial support would make the act meaningless.

As PWDVA has moved Indian law in the right direction – it said, for the first time clearly, that what happens behind closed doors is still the law’s business. By evaluating PWDVA at two different levels. At the top, appellate courts have read the act in favor of women – strengthening maintenance rights, residence orders, and treating domestic violence as a serious legal wrong. At lower level, it is messier. A research covering 7,000 orders across 14 states reveals something frustrating – judges still treat maintenance as something a husband chooses to give, not something, a wife has a right to receive¹⁶. In legal system, reforms are happening at the top but it has not fully reached at the bottom.

Another big question the courts have had to answer is – who does this law protect? The PWDVA was never meant to protect only women in traditional marriages. This act does not discriminate against any woman, regardless of her marital status or personal situation – whether married, unmarried, separated, or widowed. This approach was adopted by PWDVA where women in all kinds of domestic situations not just married women. The judicial interpretation has expanded its coverage in some cases and restricted it in other cases. In practice, this means different – two women entering courtrooms with similar stories but walking out with completely different levels of protection. The law is the same – but its reach is not always consistent.

THE GAP BETWEEN LAW AND REALITY

The PWDVA was a landmark moment for women’s right in India as it created real and important rights for a large number of women across India and created whole support structure to back them up. However, somewhere in between it has been lost.

The PWDVA did not just create real and important rights- it created a system of people who are responsible for delivering those rights and strong support. PROTECTION OFFICERS and SERVICE PROVIDERS were supposed to be the backbone of this system. Their job was to make sure that those rights actually reached the women who needed them, protection officers

¹⁶ Analysing orders granted under the PWDVA, 2005. National Law School of India University. (2021, June 15). <https://www.nls.ac.in/publications/analysing-orders-granted-under-the-pwdva-2005/>

were meant to guide them and shelter providers were meant to shelter and support them. However, that system has largely not worked the way, it meant to. As these officers are frequently undertrained, overwhelmed, and invisible to the very women, they created to serve. In many rural districts, the position exists in government files but nowhere else and public does not know that there are someone who was legally supposed to help them for domestic abuse. Rights mean nothing if the people who need them have never heard about them, so awareness becomes one of the biggest failures of implementation. For the PWDVA to help a woman she needs to know it exists – yet too many remain in the dark side. This situation majorly took place in villages and smaller towns as, they completely have no idea that the parliament has passed PWDVA especially for them – which gives them the right to stay in their home, get protection, and receive financial support. That ignorance is not their failure as knowledge is the first step to earn justice. Without it, everything what the act is offering becomes irrelevant. The law gave women concrete rights to protect them. However, rights alone are not enough for success. The PWDVA promises the victims to give shelter, legal aid and medical support but these all becomes the dream as one of the important aspect – infrastructure is lagging behind as it becomes hard to reach to the small cities. Due to all these problems women who are brave enough to walk out of an abusive home often, has nothing waiting on the other side. This is the harsh gap between law and reality.

Laws on paper can be written in a day. Mindsets take generations to change. So this can be seen in India where many people still do not see domestic violence as a crime, for them it is considered as a private matter. That thinking, something a woman expected to tolerate does not stay behind the closed doors. It shows up how police handle complaints, how families respond when a woman asking for help, and how communities perceived them who speak up. This can be understood as a cultural weight, which is the biggest barrier to change, it sits on the head of the every woman who is trying to use this law – and legislation alone was never going to be enough to fight this battle of changing mindset.

It would be unfair to call the PWDVA a failure because giving rights and delivering rights are two different things. In India, the gap between the two remains wide. Not because the law is not proper but, because turning them into reality has never been handled with seriousness and it has not served to the victims in the right place at the right time.

CONCLUSION

After studying the Protection of Women from Domestic Violence Act, 2005, I feel it has been marked as a turning point in how Indian law addresses domestic violence. Prior to 2005, laws

only focused on criminal punishment but this act created the legal reforms for women's rights in India by prioritizing the victim's safety, dignity, and economic security. This act broadens the scope and the actual definition of domestic violence what it is. This act offers practical solutions like protection orders, residence rights, maintenance and monetary relief that all can immediately improve a woman's situation, so that she can live her life smoothly without any future tension.

However, from what I've understood is that the gap is very large and to fill that gap it takes generations. The claim that moving from theory to practice is difficult; this is clearly validated in real – world contexts. The infrastructure it requires- protection officers, service providers, who are supposed to help the women in difficult situation, either they don't exist in many places or if they exist many people doesn't know about them or not doing their work properly.

In my opinion, I don't believe that the law itself is the problem. The problem is execution. Here are some reforms that could make a real difference: firstly spread more awareness about this law among women, especially in rural areas by teaching them what rights they have and what support this act is giving them. Secondly, appoint and train protection officers and service providers in every district by giving them proper training and resources so they can do their job properly. Third, establish fast track courts for domestic violence cases would ensure that women get faster relief instead of waiting for years because delayed justice means continued suffering. Fourth, different agencies have different roles but if they work together instead of working in isolation, which gives strong help to the victims.

The PWDVA gave us an excellent framework. Now we need to make sure it reaches women behind closed doors – where it matters the most.

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