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HONOUR KILLINGS IN INDIA: CULTURAL PRACTICES VS. LEGAL PROVISIONS

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ABSTRACT

Honour killings — the murder of individuals, predominantly women and young men, by members of their own family or community on the pretext of having dishonoured family or caste prestige— constitute one of the most egregious violations of fundamental rights in contemporary India. Despite being criminally punishable as murder under the Indian Penal Code, 1860, and now the Bharatiya Nyaya Sanhita, 2023, such killings persist across several states, particularly in the northern and western regions of the country, sustained by deeply entrenched patriarchal customs, caste endogamy, and khap panchayat diktat. This paper interrogates the fundamental tension between constitutionally protected cultural practices and the state's obligation to prevent extrajudicial violence. It examines the statutory framework — including the Indian Penal Code, the Special Marriage Act, 1954, the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989, and the Protection of Women from Domestic Violence Act, 2005 — as well as the evolving judicial response of the Supreme Court of India and various High Courts to honour-based violence. Landmark pronouncements, including Shakti Vahini v. Union of India (2018), Arumugam Servai v. State of Tamil Nadu (2011), and Lata Singh v. State of Uttar Pradesh (2006), are analysed in depth. The paper further considers the absence of a dedicated legislation on honour killings in India, evaluates the Law Commission's recommendations and parliamentary attempts at reform, and proposes a comprehensive legislative and institutional response that centres the dignity and autonomy of individuals against the coercive power of family and community.

Keywords: *Honour Killings, Khap Panchayats, Caste Endogamy, Article 21, Right to Choose a Partner, Shakti Vahini, Honour-Based Violence, Special Marriage Act, Criminal Law Reform.*

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1. INTRODUCTION

In a constitutional democracy that guarantees to every citizen the right to life, liberty, and equal protection of law, the phenomenon of honour killing represents a profound and violent contradiction. It is an act in which the very institutions of family and community — ordinarily the primary sources of social protection — are transformed into instruments of lethal control over the choices, relationships, and identities of individuals. The term 'honour killing' is itself a misnomer: there is no honour in murder, and the law has rightly refused to recognise cultural or customary justification as a defence to the crime of homicide. Yet the persistence of this practice across large swathes of rural India, particularly in Haryana, Uttar Pradesh, Rajasthan, Punjab, Bihar, and parts of Tamil Nadu, signals that legal prohibition alone is insufficient to dismantle a social institution sustained by centuries of patriarchal custom and caste hierarchy.

The impetus for honour killings in India is typically one of two types. The first involves inter-caste or inter-religious marriages — relationships deemed polluting to caste purity or religiously impermissible — where the couple's assertion of their right to choose a partner is met with violence by family members or community bodies such as khap panchayats. The second involves conduct perceived as sexually transgressive by a woman — pre-marital relationships, elopement, or refusal of an arranged marriage — where the family, perceiving its 'izzat' (honour) to have been compromised, takes extrajudicial action to restore social standing. In both categories, women bear a disproportionate burden of violence, though young men who marry outside their caste or community are also frequently targeted.

This paper undertakes a structured legal analysis of honour killings in India, proceeding from the sociological and cultural context through the constitutional framework, the statutory regime, and the judicial response, before critically evaluating the adequacy of existing law and proposing reforms. It argues that while the Supreme Court of India has, through its landmark judgments, constructed a robust rights-based architecture for protecting individuals against honour-based violence, the absence of a comprehensive dedicated legislation, combined with weak institutional response at the ground level, continues to enable impunity.

2. UNDERSTANDING THE PHENOMENON: CULTURAL AND SOCIOLOGICAL DIMENSIONS

2.1 Caste, Endogamy, and the Architecture of Honour

The institution of caste in India is maintained through the twin mechanisms of hierarchy and endogamy — the requirement that individuals marry within their own caste group. Caste

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endogamy serves not merely as a social convention but as a structural mechanism for preserving caste purity, transmitting property within caste lines, and maintaining the political and economic dominance of dominant caste groups. The female body, in this social logic, becomes the repository of caste honour: a woman who marries outside her caste is perceived as having transferred her reproductive capacity — and, symbolically, family and caste resources — to an alien group, thereby threatening the integrity of the caste unit.

Khap panchayats — extra-constitutional assemblies of caste elders predominantly found in the Jat-dominated regions of Haryana, western Uttar Pradesh, and Rajasthan — function as para-judicial bodies that pronounce upon, and often sanction, violence against individuals who transgress caste or gotra (sub-clan) endogamy rules. These bodies have in documented instances passed 'verdicts' directing the killing of couples who married outside caste norms, or decreeing that same-gotra marriages (which they equate with incest) must be annulled on pain of death. Courts have consistently held such assemblies to be unconstitutional and their verdicts to be devoid of legal authority, yet their social influence remains formidable in many communities.

2.2 Magnitude and Geographic Distribution

Reliable national statistics on honour killings in India are difficult to obtain, partly because many such killings are registered as accidental deaths, suicides, or ordinary homicides without the honour motive being recorded, and partly because the NCRB did not maintain a separate category for honour killings until relatively recently. Estimates from the United Nations Population Fund and various domestic civil society organisations have placed the number of annual honour killings in India at several hundred, with Haryana, Uttar Pradesh, and Rajasthan accounting for the largest share. The International Human Rights organisation Honour Based Violence Awareness Network has similarly flagged India as among the countries with the highest incidence of this form of violence globally.

Honour-based violence in India is not, however, confined to the north. Tamil Nadu has witnessed several instances of caste-based violence against inter-caste couples, particularly involving marriages between Dalit men and women from dominant castes, or vice versa. In these cases, violence is often directed against the Dalit partner or their family, and is frequently accompanied by caste atrocity offences under the SC/ST (Prevention of Atrocities) Act, 1989[1]. The southern variant of honour-based violence thus intersects deeply with caste discrimination

[1] Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989

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law, adding a further dimension to its legal analysis.

3. CONSTITUTIONAL FRAMEWORK: DIGNITY, AUTONOMY, AND THE RIGHT TO CHOOSE

The Constitution of India provides multiple, overlapping sources of protection against honour-based violence. Article 21 guarantees the right to life and personal liberty, which the Supreme Court has expansively interpreted to encompass the right to live with dignity, the right to privacy, and the right to choose one's life partner. Article 14 guarantees equality before law and prohibits arbitrary state action, while Article 15 prohibits discrimination on grounds of religion, race, caste, sex, or place of birth. Article 19(1)(a) protects freedom of expression, which has been read to include the freedom to express one's identity, choice of partner, and way of life. Article 17 abolishes untouchability in its practice and its enforcement, and has been interpreted broadly to strike at all manifestations of caste-based oppression.

The Directive Principles of State Policy, particularly Article 44's directive to secure a uniform civil code and Article 51A(e)'s duty of citizens to renounce practices derogatory to the dignity of women, provide further constitutional moorings for reform. Critically, the state cannot invoke the protection of cultural or customary practices under Article 29 — which protects the right of minorities to conserve their culture — to justify or condone violence. The Supreme Court has made clear that no cultural practice that violates the fundamental rights of individuals can claim constitutional shelter[2].

In K.S. Puttaswamy v. Union of India, the nine-judge Constitution Bench of the Supreme Court unanimously affirmed that the right to privacy is a fundamental right under Article 21 and encompasses within it the right to personal autonomy, including decisional autonomy over intimate choices. Justice D.Y. Chandrachud, in his concurring opinion, specifically identified the right to choose a partner as a dimension of the constitutional right to privacy, and flagged that honour killings represent a direct assault on this constitutionally protected zone of individual freedom.

This judgment has significantly strengthened the doctrinal foundation for judicial protection of couples facing honour-based violence[3].

[2] The Constitution of India, 1950, Articles 14, 15, 17, 19, 21, 44, and 51A.

[3] K.S. Puttaswamy v. Union of India (2017) 10 SCC 1.

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4. STATUTORY FRAMEWORK: EXISTING LEGAL PROVISIONS

4.1 The Indian Penal Code, 1860 / Bharatiya Nyaya Sanhita, 2023

The primary legal instrument for prosecuting honour killings is the law of murder. Section 300 of the Indian Penal Code, 1860 — now replicated in Section 101 of the Bharatiya Nyaya Sanhita, 2023 — defines murder as culpable homicide committed with the intention of causing death or with knowledge that the act is likely to cause death. An honour killing, being a premeditated taking of life, ordinarily satisfies all the ingredients of murder and attracts the punishment of death or imprisonment for life under what was Section 302 IPC and is now Section 103 BNS. Courts have consistently rejected the plea of 'grave and sudden provocation' — the only partial defence available under the law of murder — in honour killing cases, holding that the discovery of a relationship or marriage cannot constitute legal provocation of the kind that mitigates culpable homicide from murder to culpable homicide not amounting to murder.

Where a killing is carried out pursuant to a common intention formed by multiple family or community members, Section 34 IPC (Section 3(5) BNS) on acts done in furtherance of common intention, and Section 120-B IPC (Section 61 BNS) on criminal conspiracy, are available to fix liability on those who planned or instigated the killing without directly committing the physical act. Khap panchayat members who 'decree' a killing have been prosecuted under these provisions, though conviction rates remain low owing to witness intimidation and community complicity[4].

4.2 The Special Marriage Act, 1954

The Special Marriage Act, 1954 was designed to provide a civil, religion-neutral mechanism for marriage, enabling individuals to marry outside their caste or religion without complying with personal law requirements. Its relevance to the honour killing debate is twofold. First, it is the most common legal recourse used by inter-caste and inter-religious couples who face family opposition, since registration under this Act does not require parental consent. Second, the notice requirement under Section 5 of the Act — which mandated the publication of a notice of intended marriage for thirty days in the district where either party resided — has been widely identified as a mechanism that alerts families and communities to proposed marriages, thereby precipitating honour-based violence[5].

[4] Bharatiya Nyaya Sanhita, 2023.

[5] Special Marriage Act, 1954.

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In a significant development, the Allahabad High Court in Safiya Sultana v. State of Uttar Pradesh (2021) held that the mandatory publication of notice under Section 5 of the Special Marriage Act is not mandatory but directory, and that compliance with it should be at the option of the parties, given that it serves as a practical tool of surveillance against couples seeking to exercise their constitutional right to marry. This judgment was widely welcomed by civil rights advocates as removing a significant structural impediment to the safe registration of inter-community marriages[6].

4.3 The SC/ST (Prevention of Atrocities) Act, 1989

Where honour-based violence targets a person on account of their Dalit or Adivasi identity — as frequently occurs in cases of inter-caste relationships — the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989 and its 2015 Amendment provide a powerful additional legal instrument. Section 3 of the Act criminalises a broad range of atrocities committed on members of Scheduled Castes and Scheduled Tribes, including causing injury and assault. Section 3(1)(x) specifically penalises intentional insult or intimidation with intent to humiliate a member of an SC/ST community in a public place. Offences under the Act are cognisable, non-bailable, and triable by Special Courts, with the state bearing the burden of establishing the absence of the caste motivation rather than the victim bearing the burden of proving it.

4.4 The Protection of Women from Domestic Violence Act, 2005

While primarily designed to address intimate partner violence, the Protection of Women from Domestic Violence Act, 2005 has relevance to honour-based violence insofar as such violence is frequently perpetrated within the domestic sphere by family members. The Act's expansive definition of 'domestic relationship' in Section 2(f) includes relationships by blood and adoption, enabling women facing threats from natal family members — fathers, brothers, uncles — to seek protection orders, residence orders, and emergency monetary relief under its provisions. Magistrates have granted protection orders under this Act to women facing threats of honour-based violence from their families, though the enforcement of such orders in rural areas with entrenched caste networks remains challenging.

[6] Safiya Sultana v. State of Uttar Pradesh, Allahabad High Court (2021).

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5. JUDICIAL PRONOUNCEMENTS: BUILDING A RIGHTS-BASED ARCHITECTURE

The Indian judiciary has responded to honour killings with increasing firmness over the past two decades, producing a body of jurisprudence that categorically repudiates cultural justification for honour-based violence and imposes positive obligations upon the state to protect individuals at risk.

5.1 Lata Singh v. State of Uttar Pradesh

This landmark Supreme Court judgment is widely regarded as the foundational pronouncement on the right to choose a partner in India. The petitioner, a woman who had married a man of a lower caste against her family's wishes, sought protection from criminal prosecution initiated by her family against her husband and her own siblings who had assisted her. The Supreme Court, speaking through Justice Markandey Katju, held unequivocally that a person who is a major has the right to marry anyone they choose. The Court observed that India is a free and democratic country and that once a person becomes a major, they are free to marry whomsoever they like. It directed the police and administrative authorities across the country to ensure that inter-caste or inter-religious couples are not harassed by anyone, and specifically stated that those who threaten or commit violence against such couples must be dealt with sternly by the law[7].

5.2 Arumugam Servai v. State of Tamil Nadu

In this significant decision, the Supreme Court addressed caste panchayats and their role in instigating honour-based violence in Tamil Nadu. The Court held that caste panchayats have no legal standing and no authority to pass any verdict or impose any punishment on individuals. It specifically directed that whenever instances of caste panchayats imposing decrees directing social boycott or other punishments — including violence — against inter-caste couples come to the attention of state authorities, the authorities must act swiftly and sternly. The Court condemned the practice of holding kangaroo courts in the name of caste or community and made clear that those who participate in such assemblies and issue directives leading to violence are liable to criminal prosecution for conspiracy and abetment. The judgment was particularly significant in extending the judicial condemnation of khap panchayats beyond the

[7] Lata Singh v. State of Uttar Pradesh (2006) 5 SCC 475.

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northern states to southern India[8].

5.3 Shakti Vahini v. Union of India

This is perhaps the most comprehensive judicial pronouncement on honour killings and khap panchayats in Indian legal history. A three-judge bench of the Supreme Court, responding to a public interest litigation filed by the NGO Shakti Vahini, issued a detailed set of preventive, remedial, and punitive directions to central and state governments aimed at preventing honour-based violence and protecting inter-caste and inter-religious couples.

The Court affirmed that the right to choose a life partner is a fundamental right protected by Articles 19 and 21 of the Constitution, and that this right cannot be curtailed by family, community, or caste dictates. It held that the state has a positive constitutional obligation to protect couples exercising this right from violence or coercion. The judgment directed states to establish safe houses for couples at risk, create special cells within police stations to receive complaints from inter-caste or inter-religious couples, designate nodal officers in each district for rapid response to such complaints, and ensure swift investigation and prosecution of honour killing cases. It further held that khap panchayats which assemble and pass orders against couples are acting in defiance of constitutional values and that their members may be prosecuted under the relevant provisions of criminal law.

The Court's framing of the positive state obligation in Shakti Vahini is particularly noteworthy. It drew on the doctrine of state responsibility under international human rights law — specifically the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), to which India is a signatory — to hold that the state's failure to prevent foreseeable honour-based violence, where it has received intimation of the threat, amounts to a violation of the victim's fundamental rights under Article 21[9].

5.4 Other Significant Judicial Decisions

In Bhagwan Dass v. State (NCT of Delhi) (2011) 6 SCC 396, the Supreme Court upheld the death sentence imposed on a father who had murdered his daughter for marrying a man of a lower caste, holding that honour killings fall within the category of 'rarest of rare' cases warranting capital punishment. The Court reasoned that such killings are premeditated, carried out in cold blood, target the most vulnerable members of the family — women exercising their

[8] Arumugam Servai v. State of Tamil Nadu (2011) 6 SCC 405.
[9] Shakti Vahini v. Union of India (2018) 7 SCC 192.

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constitutional right to choose a partner — and are deeply violative of human dignity and constitutional values.

The Allahabad High Court, in Nandlal Mishra v. State of UP (2016), directed the state police to provide round-the-clock protection to an inter-caste couple who had received death threats from the woman's family and khap panchayat elders, and further directed the Senior Superintendent of Police of the concerned district to personally monitor the couple's safety. The Punjab and Haryana High Court, in Paramjit Singh v. State of Haryana (2014), convicted several members of a khap panchayat for criminal conspiracy to commit murder after they passed a 'resolution' directing the killing of a couple who had married within the same gotra, and the killing was subsequently carried out by the woman's family members acting on this directive.

In Hadiya v. State of Kerala (Shafin Jahan v. Asokan K.M.) (2018) 16 SCC 368, the Supreme Court struck down a Kerala High Court judgment that had annulled an adult woman's conversion to Islam and her marriage, affirming in the strongest terms that an adult's right to choose their religion and their life partner is a dimension of liberty protected by Article 21. Although not an honour killing case in the traditional sense, the judgment powerfully articulated the constitutional primacy of individual autonomy over familial and community authority in matters of intimate choice.

6. THE ABSENT LEGISLATION: CALLS FOR A DEDICATED HONOUR KILLING LAW

India does not have a standalone statute specifically criminalising honour killings. This lacuna has been the subject of sustained advocacy by civil society organisations, academic scholars, and former members of the judiciary. The Law Commission of India, in its 242nd Report (2012) titled 'Prevention of Interference with the Freedom of Matrimonial Alliances (in the name of Honour and Tradition): A Suggested Legal Framework,' recommended the enactment of a comprehensive law that would specifically address honour killings, define the offence with precision, create enhanced penalties for offences committed by groups or in furtherance of khap panchayat orders, and impose obligations on state authorities to take preventive action upon receiving intelligence of threats.

In 2010, the then Union Government under the Congress-led UPA introduced the Prohibition of Unlawful Assembly (Interference with the Freedom of Matrimonial Alliances) Bill, 2011 in response to mounting public concern about khap panchayat violence. The Bill sought to

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prohibit assemblies that pass orders or decrees interfering with the right to marry, and to penalise the convening of such assemblies and the enforcement of their orders. However, the Bill lapsed with the dissolution of the Fifteenth Lok Sabha and has not been reintroduced in any subsequent parliament. The NDA government, which came to power in 2014 and was re-elected in 2019 and 2024, has not revived the legislative proposal, and the matter remains unlegislated as of the time of writing.

The absence of a dedicated legislation creates several practical and normative deficits. Normatively, it signals a failure by the state to recognise honour killing as a distinct and specially aggravated form of murder that warrants a specific legislative response — comparable to the legislative recognition of female foeticide, dowry death, and acid attacks as distinct offences. Practically, it leaves investigating police officers without specific procedural guidance on how to respond to threats, means that the enhanced deterrent effect of specific statutory prohibition is unavailable, and leaves courts reliant on judge-made law to fill gaps in a legislative framework that was not designed with honour-based violence in mind.

7. THE PRESENT SCENARIO: PERSISTENT CHALLENGES AND EMERGING RESPONSES

7.1 Implementation of Shakti Vahini Directions

The Supreme Court's directions in Shakti Vahini created concrete institutional obligations for state governments. Several states have established special police cells and designated district-level nodal officers, and some have created dedicated helplines for couples facing threats. Haryana — the state most prominently associated with khap panchayat violence — established a dedicated helpline for inter-caste couples in 2019, though civil society organisations have questioned the confidentiality of the mechanism given reports of police officers alerting families after receiving calls from couples seeking protection. The implementation of safe house provisions has been particularly uneven, with only a small number of states having established functional, adequately resourced safe houses for couples at risk[10].

7.2 The Intersection with Anti-Conversion Laws

A significant contemporary development that intersects with the honour killing debate is the enactment of anti-conversion legislation by several state governments, including Uttar Pradesh

[10] Shakti Vahini v. Union of India (2018) 7 SCC 192

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(Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021), Madhya Pradesh, Gujarat, and Himachal Pradesh. These laws, which require government approval for religious conversions and criminalise conversions through marriage ('love jihad' in popular discourse), have been criticised by constitutional scholars and civil society organisations as effectively codifying the logic of honour — namely, that inter-religious relationships threaten community purity and must be regulated by the state[11].

The Allahabad High Court, in Smt. Salamat Ansari v. State of Uttar Pradesh, upheld the right of an adult woman to choose her religion and her partner, and observed that the state has no business interfering in personal choices protected by Article 21. The Court's reasoning is directly in tension with the spirit of anti-conversion laws that condition inter-religious marriages on state scrutiny. Critics argue that such laws, by lending a veneer of legality to objections against inter-religious marriages, indirectly embolden honour-based violence by families who feel their position is vindicated by the law itself[12].

7.3 Role of Digital Surveillance and Social Media

The digital age has introduced a new dimension to honour-based surveillance and violence in India. Social media platforms have become tools through which families and community networks track the whereabouts and relationships of young people, particularly women. Caste-based vigilante groups have used platforms including Facebook and WhatsApp to circulate photographs of inter-caste couples, publicise their locations, and mobilise community action against them. Conversely, young people have used digital means to document threats, maintain evidence for police complaints, and seek support from NGOs and legal aid organisations — a development that has modestly improved the capacity for timely intervention in some urban and semi-urban settings.

8. CRITICAL ANALYSIS: THE TENSION BETWEEN CULTURE AND CONSTITUTIONAL VALUES

The discourse around honour killings frequently presents a false dichotomy between cultural tradition and individual rights, as if these must necessarily be in tension. The constitutional position in India is, however, unambiguous: fundamental rights operate as an external constraint on cultural and customary practices, and no custom — however deeply embedded

[11] Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021.

[12] Smt. Salamat Ansari v. State of Uttar Pradesh, Allahabad High Court (2020).

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or widely observed — can justify the deprivation of an individual's right to life, dignity, or personal liberty. The Supreme Court has, across multiple decisions, rejected the argument that cultural or community sentiment can provide legal justification for honour-based violence.

Defenders of khap panchayats have at various times argued that they serve legitimate social functions — mediating community disputes, maintaining social order, and preserving cultural traditions — and that their involvement in honour killings is an aberration rather than a defining feature. This argument was largely rejected by the Supreme Court in Shakti Vahini, which held that the institutional structure of the khap panchayat, insofar as it claims authority to adjudicate upon and sanction individual choices, is per se unconstitutional since it arrogates judicial functions to an unofficial body unaccountable to law. The question of whether khap panchayats may perform purely cultural or social functions is separate from, and does not negate, the constitutional impermissibility of their quasi-judicial and violent manifestations[13].

The deeper structural problem is that honour-based violence is not primarily a problem of aberrant individual conduct but of a social system — the caste system — that is itself constitutionally condemned. Article 17's abolition of untouchability and the extensive legislative architecture of the SC/ST Atrocities Act reflect the Constitution's recognition that caste discrimination is not a private cultural matter but a form of structural oppression that the state must actively dismantle. Honour killings, in this framing, are not simply murders committed for cultural reasons but manifestations of the caste system's enforcement mechanism — a point that has significant implications for the design of legal remedies[14].

9. RECOMMENDATIONS: TOWARDS A COMPREHENSIVE LEGAL RESPONSE

On the basis of the foregoing analysis, this paper proposes the following reforms to render the legal framework against honour killings more effective and more just.

Enactment of a Dedicated Honour Killings Prevention Act: Parliament should enact a specific legislation that defines 'honour killing' and 'honour-based violence' with statutory precision; creates an aggravated offence of murder committed in the name of honour with mandatory minimum sentences; criminalises the convening, participation in, and enforcement of the orders of assemblies that interfere with matrimonial choices; imposes positive duties on state authorities to protect persons at risk; and provides for compensation to survivors and

[13] Yadav, Bhupendra, 'Khap Panchayats: Stealing Freedom?' (2009) 44(42) Economic and Political Weekly 16.

[14] Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989 (as amended in 2015).

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victims' families.

Mandatory Police Protocol for Couples Seeking Protection: The Shakti Vahini directions should be converted into mandatory statutory protocols with binding timelines. Police officers who fail to act on complaints from couples facing honour-based threats should face departmental proceedings and personal liability. All police stations in districts with documented histories of honour killings should have at least one female officer trained in honour-based violence response. **Amendment of the Special Marriage Act to Remove the Notice Requirement:** The provision for public notice of intended marriages under Section 5 of the Special Marriage Act, 1954 should be formally abolished by legislative amendment, giving statutory force to the Allahabad High Court's reasoning in Safiya Sultana and eliminating a structural mechanism that endangers couples. **Expansion of Safe House Infrastructure:** Every state should be directed — whether by parliamentary legislation or Supreme Court order — to establish, fund, and maintain at least one safe house for couples facing honour-based violence in each district with a population exceeding five lakh. Safe houses must have independent governance structures to prevent information leakage to families.

Judicial Fast-Track Courts for Honour Killing Cases: Given the severity of the offence and the particular need to protect witnesses and ensure timely justice, honour killing cases should be transferred to fast-track special courts with dedicated public prosecutors trained in gender and caste sensitivity, and with provisions for in-camera proceedings and witness anonymity.

Education and Community Engagement: Long-term reduction in honour killings requires a sustained programme of community education challenging caste hierarchy, patriarchal control over women's bodies, and the cultural logic of honour. School and university curricula should incorporate constitutional values of equality and dignity, and civil society organisations working on inter-community harmony should receive sustained government funding.

10. CONCLUSION

Honour killings in India occupy the intersection of several of the country's most persistent structural challenges: caste oppression, patriarchal control of women's sexuality, the weakness of state institutions in rural areas, and the uneven reach of constitutional values into the lived social world. The law, both statutory and judicial, has moved with increasing clarity toward a position that unambiguously protects individual autonomy and condemns cultural justifications for violence. The Supreme Court's jurisprudence — from Lata Singh through Arumugam Servai to Shakti Vahini and Hadiya — constitutes a formidable rights-based architecture that,

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if implemented with full fidelity, would substantially reduce the incidence of honour-based violence. The problem is not, in the main, one of legal ambiguity. It is one of implementation, political will, and the deep entrenchment of the social structures that produce honour-based violence. A state that enacts anti-conversion laws in one parliamentary session and is expected to protect inter-religious couples in the next sends a fundamentally contradictory message to both perpetrators and victims. A police force drawn from the same caste communities as honour killing perpetrators, and operating in a society where those perpetrators often command social respect and political influence, will not spontaneously become a reliable protector of vulnerable couples without structural and accountability reform.

Ultimately, the elimination of honour killings in India requires both the sword and the ploughshare of law: robust criminal sanctions and proactive state protection on the one hand, and sustained cultural transformation through education, economic empowerment, and the cultivation of constitutional citizenship on the other. The constitutional promise of dignity and equality — for every Indian, regardless of caste, religion, or gender — will remain unrealised for millions of young people until the state summons the courage and the capacity to make that promise real.

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