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INTERNATIONAL JOURNAL FOR LEGAL RESEARCH & ANALYSIS

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Honour Killing in India

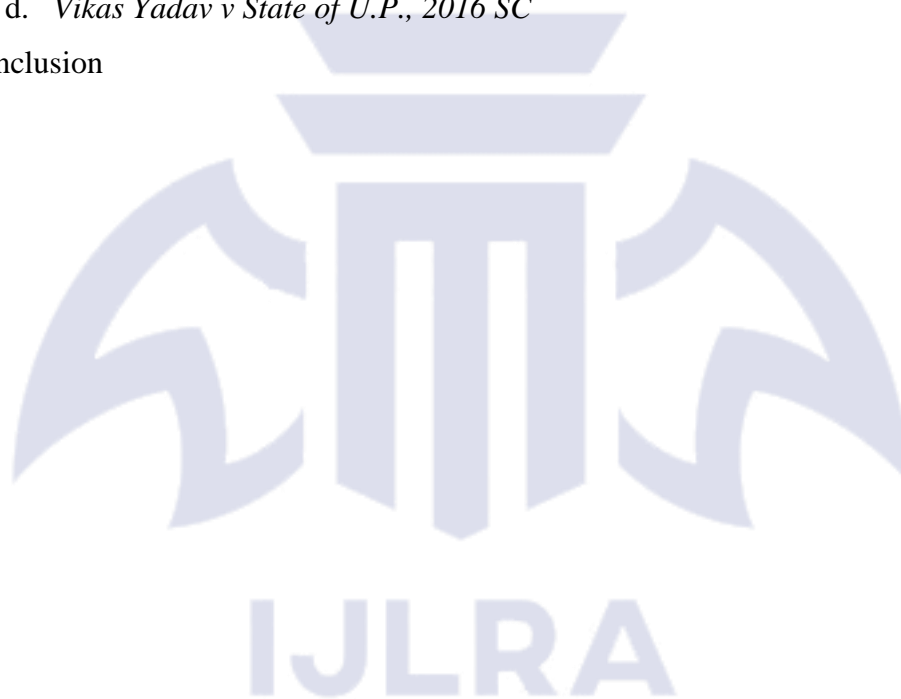
Authored By: Ishita Kaushal

BBA-LLB

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Abstract

All individuals are born free and equal and have certain human rights owing to their very existence as human beings. These rights can thus neither be conferred nor taken away by any state or non-state actor. In addition to these, an individual also has the right to enforce fundamental rights granted under the constitution. Some basic and inherent rights of an individual are – Right to Equality, Right Against Discrimination, Right to Dignity, Right to Personal Liberty and most importantly Right to Life. On the same lines, it needs to be understood that right to start a family is a basic right and two adults should be at liberty to enter into or dissolve a marriage of their own accord without any undue influence or threats to do so; and without any limitations being placed on them with respect to sex, caste, religion, et al¹.

Keywords: honour killing, gender-based crime, caste system, barbaric, khap panchayat, human rights.

Introduction

‘Honour Killing’ per se refers to the act of committing homicide of a family member, mostly females, who either has or is perceived to have brought dishonour upon the family name, in an attempt to wash off such dishonour through bloodshed. Honour killing is more often than not a premeditated and meticulously carried out series of barbaric acts carried out in connivance with family members (other than the victim), and the community members, sometimes even with the aid of police officials, who end up playing an integral role.

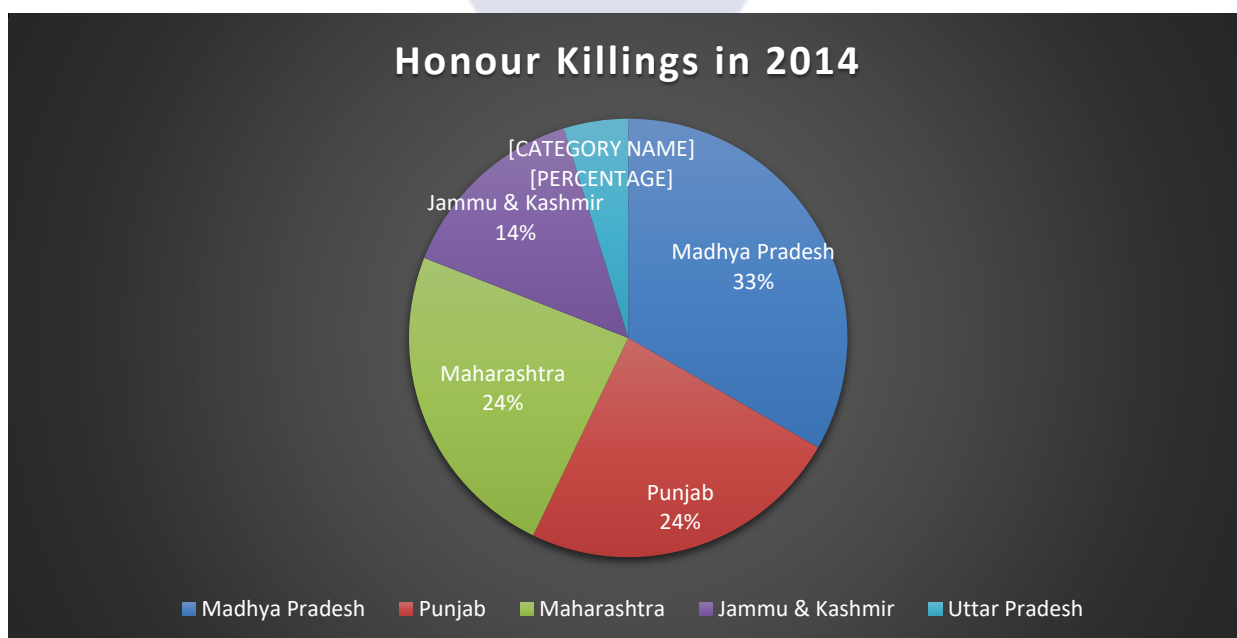
As evident through a perusal of cases reported over time, the perpetrators of this crime have an elevated sense of absolution and justice, and are unabashed in their actions. These perpetrators believe they are justified in taking law into their own hands thereby ending someone’s life. They take pride in violently enforcing the idea that any transgression of the cultural norms which isn’t deemed to be acceptable to the society will not be tolerated and the doer of such actions will be put down for good, for their actions are believed to bring disrepute to the family’s standing.

¹ Universal Declaration of Human Rights, Article 16.

Statistics

The information provided below is an understatement of the true pervasiveness of honour killing as a crime in India owing to the fact that it is grossly under-reported, and most of the incidents are passed off as accidents or suicides by the families. In addition to that, due to dire lack of awareness of this social evil many cases are simply labelled as just another murder and are resultantly not reported as honour killings.

In 2012 based on the data available it was seen that cases for honour killings in India were predominantly reported from the states of Haryana, Punjab, Rajasthan and U.P. Additionally, Bhagalpur in Bihar was also notably infamous for honour killings and some cases from Delhi and Tamil Nadu were also reported.²



The National Crime Records Bureau of India recorded murders under the category of ‘Honour Killing’ for the first time in 2014. The data graphically presented above is as follows³:

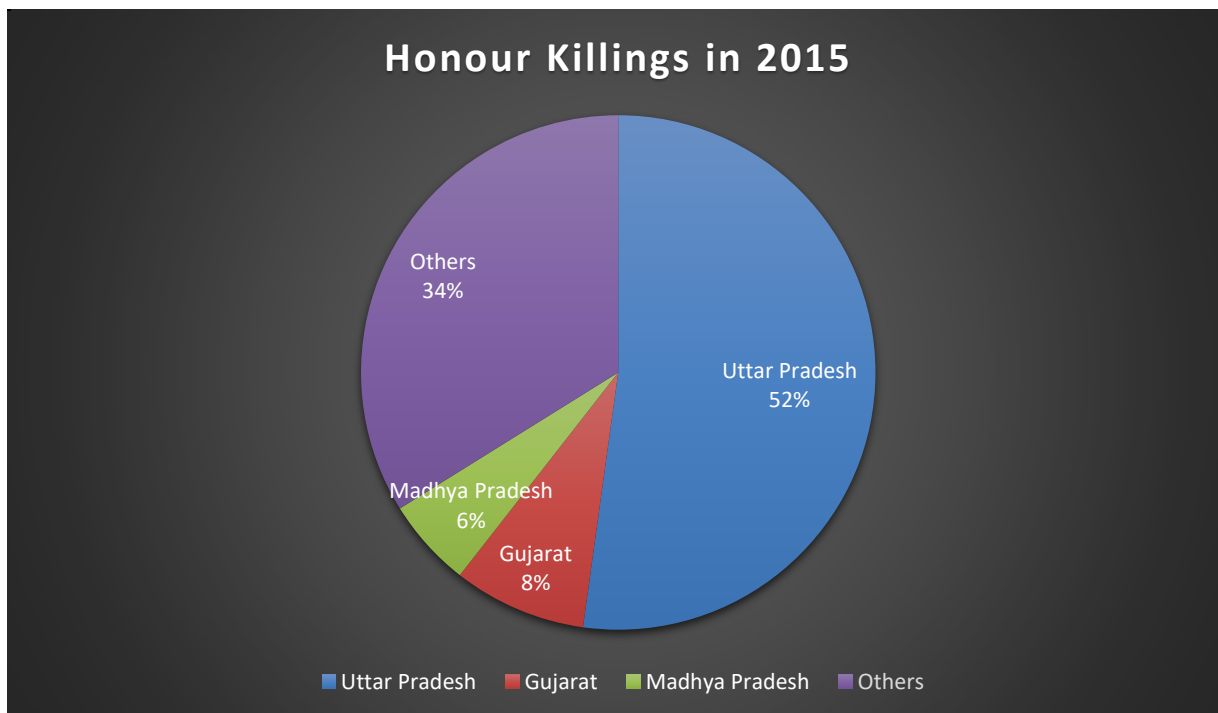
Madhya Pradesh	- 7 cases
Punjab	- 5 cases
Maharashtra	- 5 cases

² Law Commission of India, “242nd Report on Prevention of Interference with the Freedom of Matrimonial Alliances (in the name of Honour and Tradition)” (August, 2012), available at: <https://lawcommissionofindia.nic.in/reports/report242.pdf> (last accessed on October 13, 2021)

³ Arvind Chauhan (2016) “Highest number of honour killings, relationship murders in UP” Times of India, 31st August, 2016, available at: <https://timesofindia.indiatimes.com/city/agra/highest-number-of-honour-killings-relationship-murders-in-up/articleshow/53949053.cms> (last accessed October 14, 2021)

Jammu & Kashmir	- 3 cases
Uttar Pradesh	- 1 case
TOTAL	- 21 cases

Even as per the US Dept. of State's Country Reports on Human Rights Practices for 2019, honour killings are primarily an issue in the states of Punjab, U.P. and Haryana.⁴



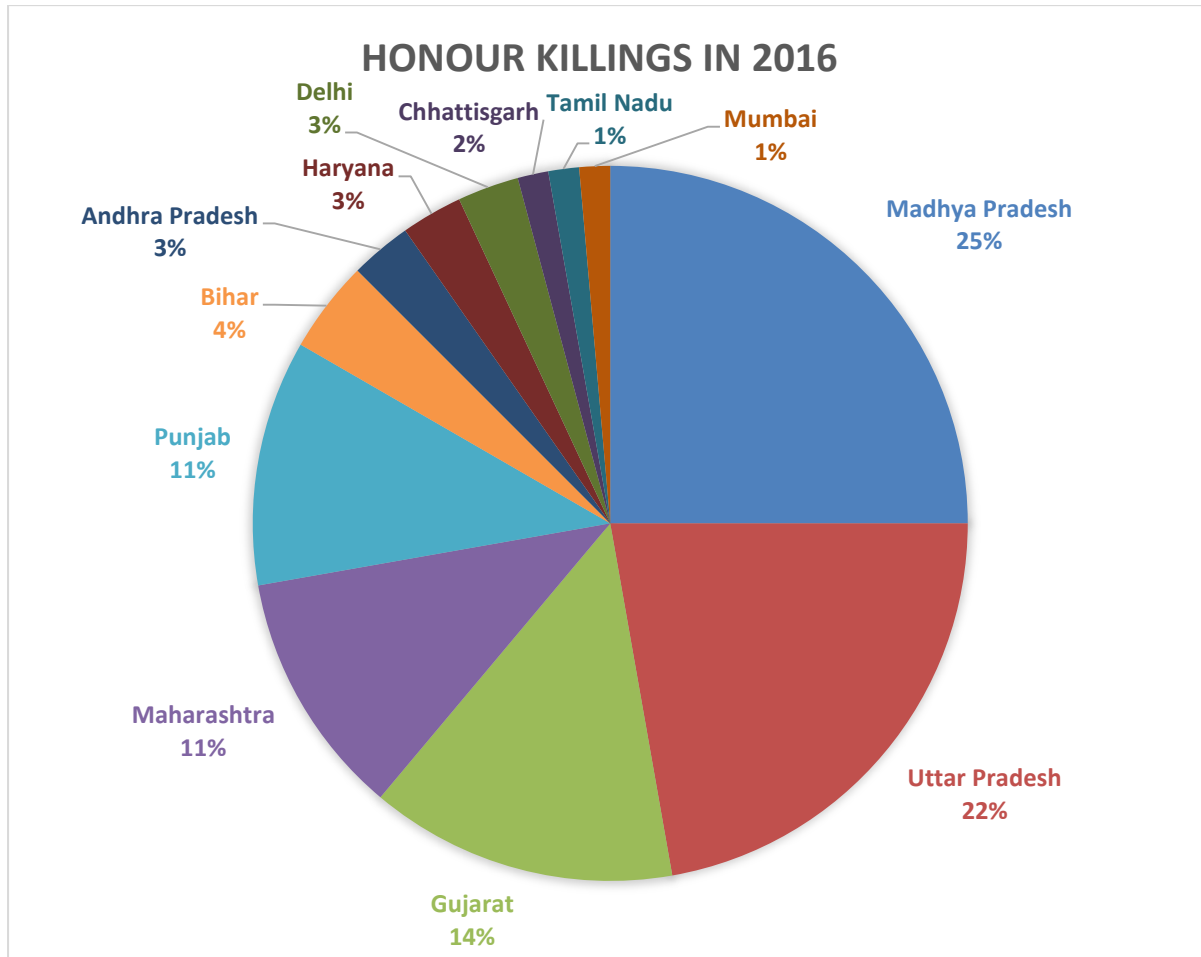
A total of 251 people died due to honour killings in 2015, and the state of U.P. contributed to 52% of such cases as shown above. The data presented graphically above is as follows:

Uttar Pradesh	- 131 cases
Gujarat	- 21 cases
Madhya Pradesh	- 14 cases
Others	- 85 cases
TOTAL	- 251 cases

The data showing the number of cases pertaining to honour killings in 2014-2015 when compared makes it hard to ignore that NCRB's data signifying that only one honour killing took place in U.P. in 2014 is highly dubious. Although, the stark rise in such cases

⁴ US Department of State, 2019 Country Reports on Human Rights Practices: India, <https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/india/> (last visited on October 12, 2021).

demonstrates an increase in awareness with respect to this violent crime and that people who are eager to voice their concerns have started reporting such cases. However, there is still a long way to go to actually offset the threat posed by this social evil at the grass root level.

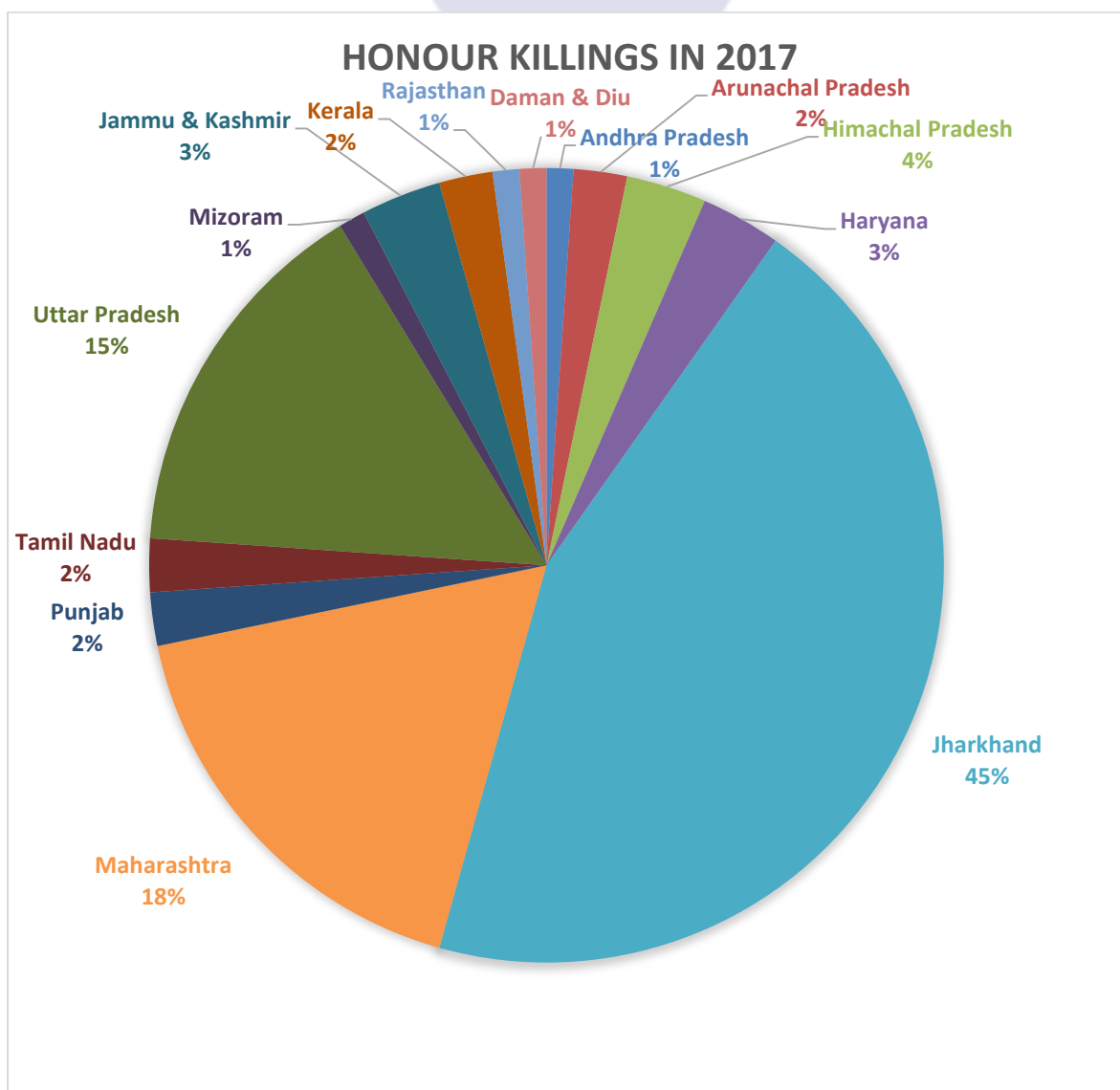


A total of 72 people lost their lives on account of honour killings in 2016, and as is evident the states of Madhya Pradesh, Uttar Pradesh, Gujarat, Punjab and Maharashtra contributed the most to such crime figures.⁵ The data presented graphically above is as follows:

Madhya Pradesh	- 18 deaths
Uttar Pradesh	- 16 deaths
Gujarat	- 10 deaths
Maharashtra	- 8 deaths
Punjab	- 8 deaths

⁵ National Crime Records Bureau, Ministry of Home Affairs, 'Crime in India 2020', Statistics Volume-1, available at: <https://ncrb.gov.in/sites/default/files/Crime%20in%20India%20-%20202016%20Complete%20PDF%20291117.pdf>, last visited on September 28, 2022.

Bihar	- 3 deaths
Andhra Pradesh	- 2 deaths
Haryana	- 2 deaths
Delhi	- 2 deaths
Chhattisgarh	- 1 death
Tamil Nadu	- 1 death
Mumbai	- 1 death
TOTAL	- 72 deaths



In 2017, a total of 92 people lost their lives due to honour killing, and Jharkhand was responsible for almost half such deaths. Other major contributors were Maharashtra and Uttar Pradesh.⁶ The data presented graphically above is as follows:

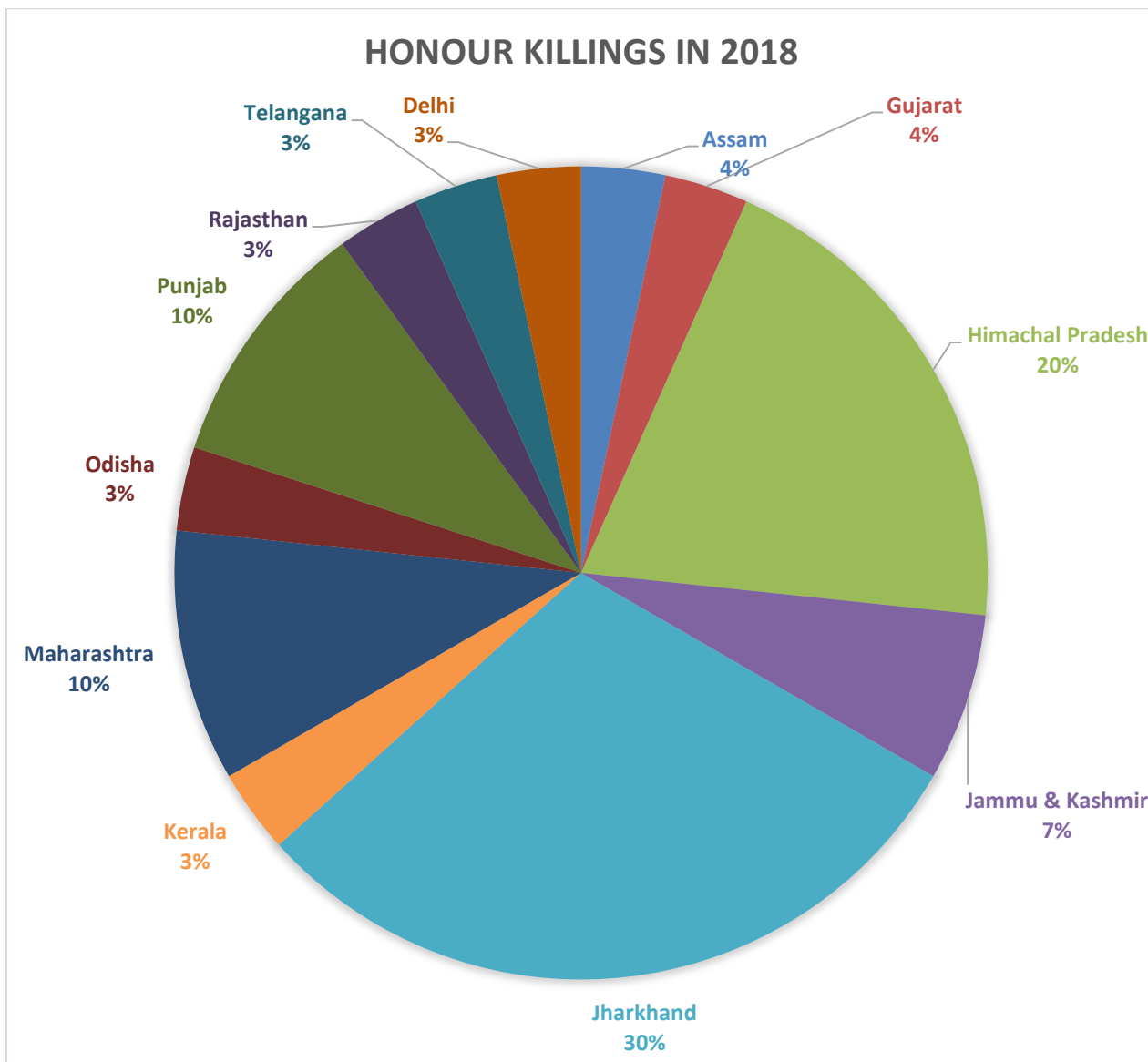
Jharkhand	- 41 deaths
Maharashtra	- 16 deaths
Uttar Pradesh	- 14 deaths
Himachal Pradesh	- 3 deaths
Haryana	- 3 deaths
Jammu & Kashmir	- 3 deaths
Arunachal Pradesh	- 2 deaths
Punjab	- 2 deaths
Tamil Nadu	- 2 deaths
Kerala	- 2 deaths
Andhra Pradesh	- 1 death
Mizoram	- 1 death
Rajasthan	- 1 death
Daman & Diu	- 1 death
TOTAL	- 92 deaths

The latest published information available with National Crime Records Bureau (NCRB) shows, a total of 28 cases in 2014, 251 cases in 2015 and 77 cases in 2016 were reported with motive as Honour Killing (including cases registered under murder (section 302 IPC) & culpable homicide not amounting to murder (section 304 IPC) in the country.⁷ However, the National Crime Records Bureau's 2017 Crime in India report left out hate crime and lynchings stating that the data available was "unreliable" and "vague".⁸

⁶ National Crime Records Bureau, Ministry of Home Affairs, 'Crime in India 2020', Statistics Volume-1, available at: https://ncrb.gov.in/sites/default/files/Crime%20in%20India%202017%20-%20Volume%201_0_0.pdf, last visited on September 28, 2022.

⁷ Ministry of Home Affairs, Honour Killings, available at: <https://pib.gov.in/PressReleaseIframePage.aspx?PRID=1540824> (last visited on October 15, 2021)

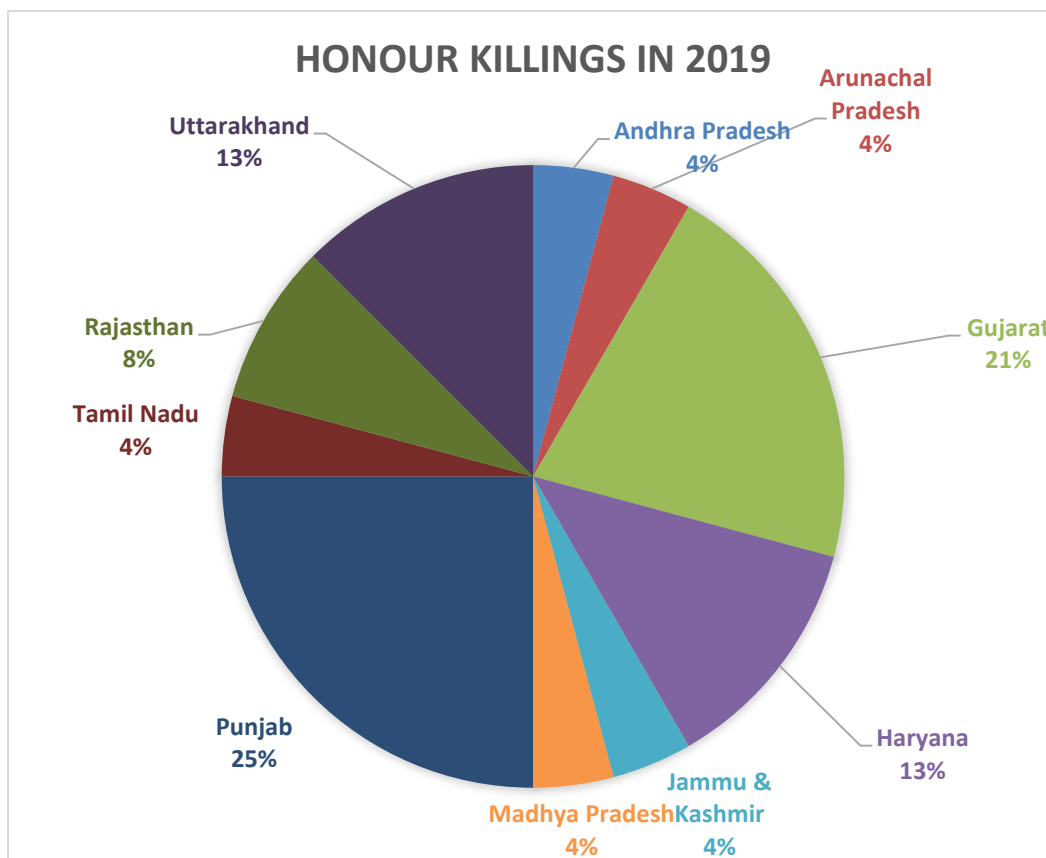
⁸ NCRB report leaves out lynching, honour killing data for being 'vague', available at: <https://www.telegraphindia.com/india/ncrb-report-leaves-out-lynching-honour-killing-data-for-being-vague/cid/1713552> (last visited on October 15, 2021)



The year 2018 witnessed a total of 30 deaths where the motive of murder was honour killing. Jharkhand staying true to its track record was responsible of 30% of such deaths, followed by Himachal Pradesh (20%), Punjab (10%) and Maharashtra (10%). The data presented graphically above is as follows:

- Jharkhand - 9 deaths
- Himachal Pradesh - 6 deaths
- Maharashtra - 3 deaths
- Punjab - 3 deaths
- Jammu & Kashmir - 2 deaths
- Assam - 1 death
- Gujarat - 1 death

Kerala	- 1 death
Odisha	- 1 death
Rajasthan	- 1 death
Telangana	- 1 death
Delhi	- 1 death
TOTAL	- 30 deaths



Honour killing incidents have seen a marked decrease in the recent years, but it is still prevalent. In 2019, 24 deaths were reported to be caused by honour killings.⁹ The data presented graphically above is as follows:

Punjab	- 6 deaths
Gujarat	- 5 deaths
Haryana	- 3 deaths
Uttarakhand	- 3 deaths

⁹ National Crime Records Bureau, Ministry of Home Affairs, 'Crime in India 2020', Statistics Volume-1, available at: <https://ncrb.gov.in/sites/default/files/CI%202019%20Volume%201.pdf>, last visited on September 28, 2022.

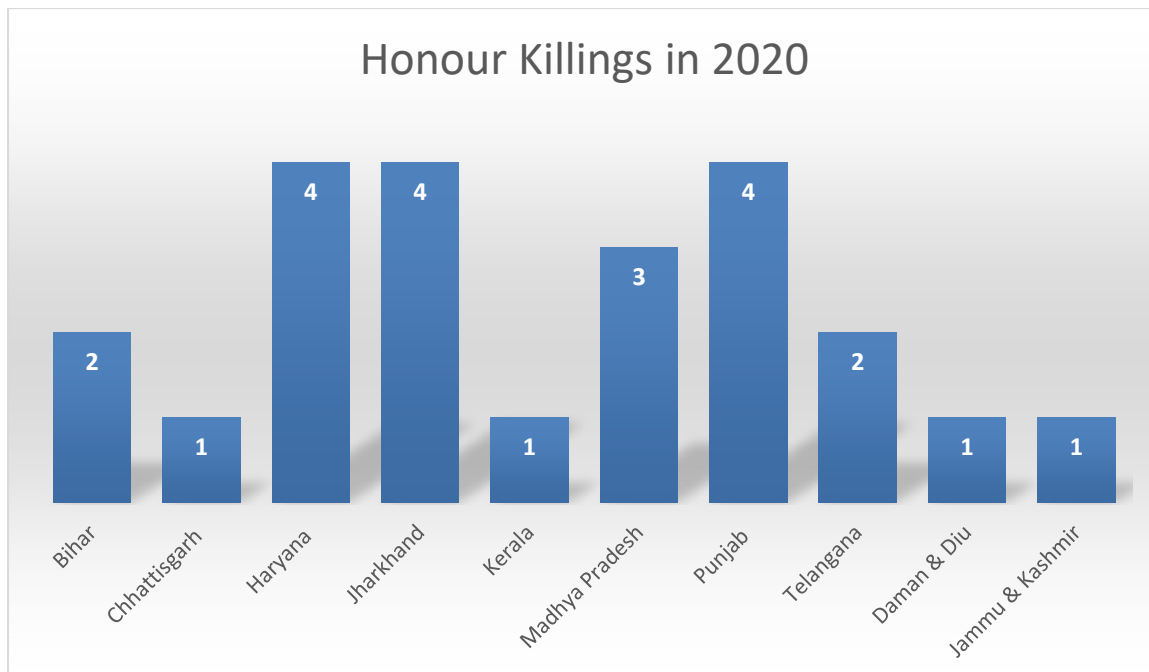
Rajasthan	- 2 deaths
Andhra Pradesh	- 1 death
Arunachal Pradesh	- 1 death
Jammu & Kashmir	- 1 death
Madhya Pradesh	- 1 death
Tamil Nadu	- 1 death
TOTAL	- 24 deaths

Mr. Ajay Kumar Mishra, the Union Minister of State for Home while replying to a question pertaining to the frequency of honour killings stated that 92 deaths were reported in 2017, 29 in 2018 and 24 in 2019 as a consequence of honour killings. He also mentioned that 50 cases were reported in Jharkhand, 19 in Maharashtra and 14 in U.P. in the period between 2017 to 2019.¹⁰ However, upon perusal of the crime statistics by NCRB for the year 2018, a slight variation can be noticed since the data collected by the NCRB shows that there were 30 murders with motives recorded as 'honour killing'.¹¹ As for 2020, a total of 23 incidents were reported as honour killings, crime figures reported by states have been graphically depicted below.¹²

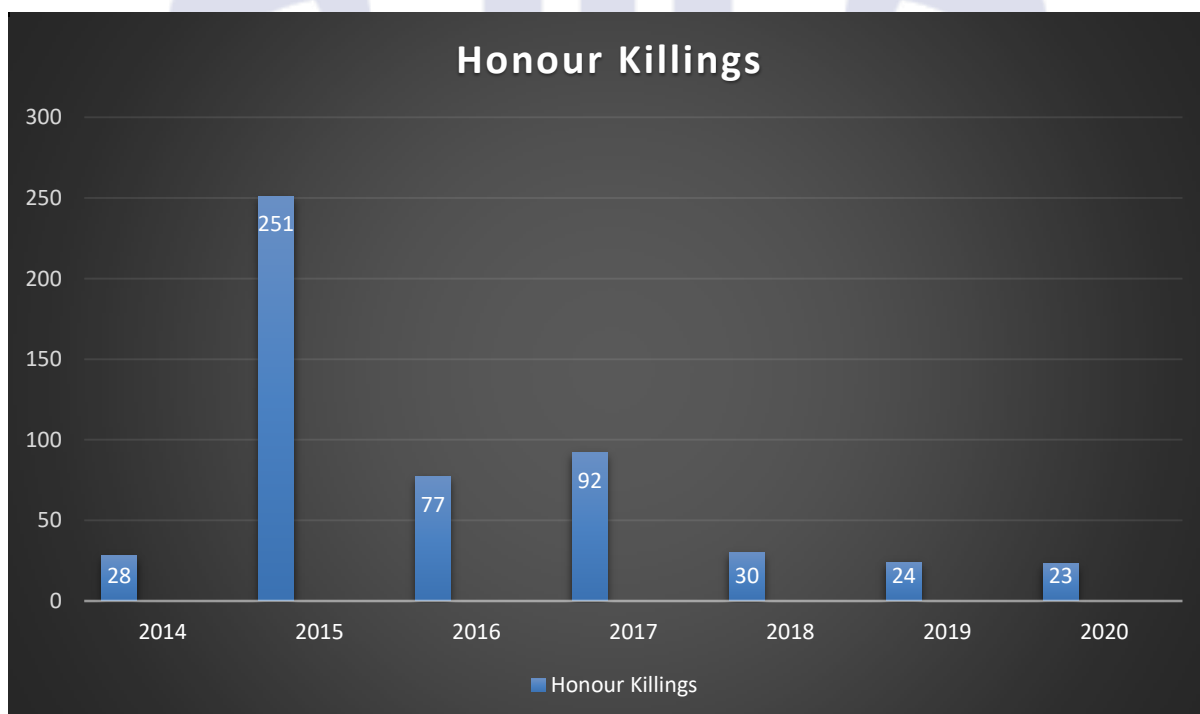
¹⁰ Incidents of honour killing between 2017 and 2019, available at: <https://www.indiatoday.in/india/story/145-incidents-of-honour-killing-between-2017-and-2019-1839321-2021-08-11> (last visited on October 14, 2021)

¹¹ India: Honour-based violence, including prevalence in rural and urban areas; legislation; state protection and support services available (2016-May 2020), available at: [\(https://www.justice.gov/eoir/page/file/1290791/download#:~:text=Sources%20note%20that%20honour%2Dbased,%2Dreported%20\(Reuters%2029%20Dec.&text=According%20to%20a%20report%20on,%5B2019%5D%2C%20162\)](https://www.justice.gov/eoir/page/file/1290791/download#:~:text=Sources%20note%20that%20honour%2Dbased,%2Dreported%20(Reuters%2029%20Dec.&text=According%20to%20a%20report%20on,%5B2019%5D%2C%20162)) (last visited on October 14, 2021).

¹² National Crime Records Bureau, Ministry of Home Affairs, 'Crime in India 2020', Statistics Volume-1, available at: <https://ncrb.gov.in/sites/default/files/CII%202020%20Volume%201.pdf>, last visited on September 28, 2022.



Here is the data analysis of honour killings over the years.



Honour Killing As A Gender Based Crime

This violent crime isn't committed against women exclusively but the focus is indubitably women.¹³ Studies show that approximately 79% of the victims of honour killing in India are females.¹⁴ The reason behind this is the deeply patriarchal mindset that has been followed since time immemorial, along with resistance to change and adapt to modern values that offer women an equal status and freedom to make independent decisions.

The words of Manu, "*In childhood, a female must be subject to her father, in youth to her husband, when her Lord is dead to her sons; a woman must never be independent.*" (Manusmriti, Chapter 5, shloka 148)¹⁵ as quoted at many places, may have been accepted at the time they were written, but the society stands evolved, and the same have lost their relevance. Although, most societies are liberal, a few still continue to practice the words as they were written which is a serious cause of concern. These words are actually meant to deprive a woman of her social rights which should have been unqualified and absolute, and such depravation is only because of the predominance of such inherently flawed ideology which is still being followed mostly in rural areas. Resultantly, the role of a women, her very existence is considered to be ancillary to the lives of the men in her family; she isn't supposed to have an independent identity let alone independence and freedom over her thoughts and expression. Due to this mindset, it is believed that whatever a woman does reflects upon her family, and thus she must abide by the social and cultural norms that govern every aspect of her life i.e., how to dress, whom to engage with, where to go etc. The status of a woman has always been kept in abeyance by the society, which treats her as a mere object that needs to be controlled by the men in the family who wish to assert dominance over each and every movement of hers. Since her existence is supposedly under their control, they feel entitled to have the right to terminate her life just as easily and that somehow, they are justified in doing so.

As per the ideologies passed down by certain tribes it is believed that community honour is located within a woman's body, to preserve which the men principally control women.

¹³ Supra note 2 at 4.

¹⁴ Tanya D'Lima, Jennifer L. Solotaroff, Rohini Prabha Pande, 'For the sake of Family and Tradition: Honour Killings in India and Pakistan', Sage Journals (2020), available at: <https://journals.sagepub.com/doi/full/10.1177/2455632719880852> (last visited on October 13, 2021).

¹⁵ Manusmriti: The Laws of Manu (ca. 1500 BC – or later-) (translated by G. Buhler), available at <http://eweb.furman.edu/~ateipen/ReligionA45/protected/manusmriti.htm> (last visited on October 10, 2021).

Hence, a woman who exercises agency over herself by acting independently, is seen as defying the cultural norms, and in so doing violating honour. It is perceived to indicate that her male guardians have not been able to control her conduct and make decisions for her that best elevate their status among other men in the community. Honour then is redeemable by destroying the body of the woman who caused dishonour. This system hence, directly lays down the groundwork for vindicating the practice and prevalence of honour crimes.¹⁶

Specific Triggers

1. Dressing up in an unacceptable manner

Honour killings have been committed for issues as trivial as the choice of clothing of a woman. By no stretch of imagination can a rational human perceive this as justified. The act of committing homicide where the victim is one's own family member who they grew up with and loved their entire lives, for the simple reason that they felt such person dressed up in an inappropriate way, is as shocking and disheartening as can be.

2. Modernization

Modernization among women is seen as a threat to age old societal norms, and is thus discouraged. The seriousness of such illogical philosophies can be better understood by the following instance; A village in the district of Mehsana in Gujarat imposed a ban on usage of mobile phones for unmarried women. In Suraj village, Gujarat a Khap panchayat-like diktat also imposed a fine of ₹ 2,100 on women for using mobile phones and ₹200 was to be granted as reward money to any informer.¹⁷ The rationale provided by these 'intellectuals' was that cell phones misguide young girls. These decisions in themselves are enough to portray the sorry state of affairs in India, but the fact that the Sarpanch of the village proudly informed the media that the entire population of 2,500 people welcomed this decision is heartrending.

¹⁶ D.T. Mayeda, R. Vijaykumar (2016).

¹⁷ Gujarat village bans mobile phones for unmarried women, available at: <https://www.hindustantimes.com/india/gujarat-village-bans-mobile-phones-for-unmarried-women/story-iziKwjYckgmOOP8ZRBn3K.html> (last visited on October 14, 2021).

3. Gossip

Apparently, any rumour or gossip about a woman is enough to cost her life. The perpetrators of honour killing have absolutely no interest in verifying the veracity of such allegations as may have been raised against the character of a woman in such chit-chat. They regard such baseless talks involving a woman as sufficient to bring disrepute to the family to which such woman belongs, and thus in order to redeem this 'lost honour' such woman needs to sacrifice her life. It is horrifying to even imagine the plight of women who live under such constant threats.

4. Marrying without family's Consent

Before delving into this as a specific trigger for committing homicides in the name of honour, it is important to understand why women are made the primary targets as recipients of such violent punishments. It is to be understood that post marriage a female is said to be a part of a new family i.e., whatever be the caste of her husband will now be her caste as well. Therefore, when a son marries a woman of a lower caste it isn't seen as such a disaster since the son would still maintain his original caste and his bride's caste will improve owing to such marriage, hence this is considered to be somewhat acceptable. However, when a woman marries a man from a lower caste, her status is consequently diminished, and when such woman's family does not wish to be associated with people from the lower caste and they wish to cut ties with them, they may resort to honour killing whereby they kill their own family member who was married into such household so as to remove the link between the two families, and avenge the dishonour brought onto their family by such marriage.

a. Inter-caste Marriage

The caste system is a curse on our nation and it needs to be countered soon. A system like that has no place in a free and democratic country like ours. Once a person has attained majority, he/she should be free to enter into marriage with a person of their choice.¹⁸

¹⁸ Lata Singh v State of U.P., 2006 (5) SCC 475.

In 2002, Nitish Katara, an MBA graduate and an IAS officer's son was abducted and killed by Vikas Yadav, the son of D.P. Yadav, Member of Parliament from U.P. who murdered Nitish Katara and burnt his naked body on the pretext that he was getting friendly with his sister Bharti Yadav. The young couple intended to get married but Katara belonged to a different caste, which was completely unacceptable to the Yadavs and hence he was killed to preserve their 'honour'.¹⁹

b. Inter-Faith Marriage

There appears to be no place for secularism when it comes to marriage of an individual. Marriage with a person of another religion is viewed as a transgression which cannot be overlooked or forgiven. The perpetrators of honour killing in such cases are more than willing to commit murders and spend life behind bars, but they won't tolerate their family member marrying someone from another faith.

c. Sagotra Marriage

All prominent religions in the world except Muslims believe that there are some degrees of prohibited relationships, and hence marriage between two people within such degrees is considered blasphemous.

5. Inappropriate Affiliations

People have lost their lives for reasons as insignificant as talking to someone who wasn't acceptable to their or the other person's family. In October, 2020 an 18-year-old, second year student in Delhi University, Rahul Rajput was beaten to death over his friendship with a Muslim girl by her brother along with other assailants. He had suffered grave injuries and was rushed to a nearby clinic where he died in the course of his treatment. The post-mortem report suggested that he died due to rupture of the

¹⁹ Nitish Katara murder case: what you need to know, available at: <https://www.thehindu.com/news/national/Nitish-Katara-murder-case-what-you-need-to-know/article15423924.ece> (last visited on October 14, 2021); I can't believe that Nitish chose someone so weak like Bharti Yadav: Nilam Katara, available at: <https://www.hindustantimes.com/delhi-news/i-can-t-believe-that-nitish-chose-someone-so-weak-like-bharti-yadav-nilam-katara/story-suIPY23duNHYuoS6I6ODFN.html> (last visited on October 13, 2021)

spleen.²⁰

6. Homosexuality

Homosexuality is a part of a person's identity; it is an inherent orientation and depends on a person's innate feelings. In accordance with Articles 21, 14, 15 and 19 an individual has the right to love any person, and is guaranteed the right to exercise sexual autonomy.²¹ However, the primitive thinking of society refuses to accept this and they find the existence of same sex couples to be disturbing. For quite a long period of time they were stigmatized by saying that homosexuality is a mental illness. However, the Mental Healthcare Act²² has now stated in clear and unambiguous terms that homosexuality is not a mental illness.²³

7. Extra-marital Affair/ Adultery

As per Blackstone's commentaries the English law "justifies homicide, when committed in defence of the chastity either of oneself or relations". Furthermore, if one catches an adulterer in the act and murders him or her, as long as one does it "in an act of passion," the offense is mitigated and considered voluntary manslaughter rather than murder. Needless to say, this is the most frequently used defence in honour killings under this head.

8. Seeking a divorce

As stated earlier the feudal-minded people refuse to accept an independent woman. Therefore, a woman who is seeking a divorce even if it is to get out of an abusive marriage or to mitigate a threat to her life, is seen as a scourge to the system of such cultural norms and is thus said to bring ill-repute to her family and it is somehow deemed as justified by such society to slaughter such a woman to maintain 'order' in the community.

²⁰ Rahul Rajput's murder: Family says woman was present at spot and even tried to save him, available at: <https://www.indiatvnews.com/news/india/delhi-rahul-rajput-murder-woman-tried-to-save-was-present-at-spot-655996> (last visited on October 12, 2021)

²¹ Navtej Singh Johar v U.O.I., (2018) 10 SCC 1.

²² Mental Healthcare Act, 2017 (No. 10 of 2017), available at: <https://egazette.nic.in/WriteReadData/2017/175248.pdf> (last visited on October 14, 2021).

²³ Mental Healthcare Act, 2017 (No. 10 of 2017), s. 2(1)(s) read with ss. 3 and 21(1)(a).

9. Being a victim of rape

Rape victims are already survivors trying hard to rehabilitate themselves into the world after the trauma they were subjected to through no fault of their own. But since being a rape victim is seen as a dishonour the family or community might feel the need to redeem their honour due to which the woman is not allowed to survive.

Important Judicial Pronouncements

The first ever case in India that dealt with honour killing was *Mrs. Madhu Priya Singh v State of U.P.*²⁴ before the Allahabad High Court back in 2003. It was in this case that the court took the standpoint that in a free, democratic and secular country like India any person who has attained the age of majority shall be at liberty to make independent decisions including the right to choose a prospective spouse without any limitations being placed on such right. An adult is deemed to know his welfare and thus is considered capable of making an informed decision. In case, the individual's parents aren't pleased with such a decision they can at most severe ties with their child, but they can under no circumstances threaten, harass, or use violence against such individual. The court noted that terrorizing or threatening to kill an individual for the simple reason of marrying outside his caste or religion is not only illegal but an act of barbarism committed by feudal-minded persons, and that such acts shall not be tolerated. M. Katju, J. also stated, "Honour Killing is nothing but cold-blooded, brutal and ghastly murder, and there is nothing honourable about it." Further, to illustrate the gravity of the crime and in an effort to condemn this practice, the court held that honour killing shall fall under the category of 'rarest of the rare cases' and thus shall be punishable with death penalty.

The findings of the court in the abovementioned case were laudable, such that when three years later the Supreme Court was presented with its first case on honour killings in *Lata Singh v State of U.P.*²⁵ the Supreme Court in this landmark judgment reiterated the findings of the Allahabad High Court. In this case the court took the stance that caste system is a curse in India and needs to be done away with as quickly as possible, and that inter-caste marriages should be encouraged as they directly pave the way to denounce this practice.

²⁴ 2003 SCC OnLine All 1071.

²⁵ 2006 (5) SCC 475.

The court also directed the administration and police authorities to ensure that no person is subjected to harassment or acts of violence for entering into an inter-caste or inter-faith marriage, and to institute criminal proceedings against any wrong-doer who shall be dealt with iron hands.

In a later case of *Arumugam Servai v State of Tamil Nadu*²⁶, the Supreme Court discussed the role played by khap panchayats in facilitating and encouraging honour killings and other cruelties in an institutionalized way. It was noted that these people took law into their own hands and tantamounted to kangaroo courts, which are completely illegal and need to be shunned. It was held that the barbaric acts undertaken or ordered to be undertaken by such khap panchayats needed to be stamped out and harsh penalties should be imposed on such barbarians. Consequently, the court gave directions to the administrative and police authorities that in addition to instituting criminal proceedings against people committing atrocities, they should immediately suspend the District Magistrate or Collector, and the SSPs/SPs of the district along with other concerned officials and to file chargesheets against them and institute departmental proceedings against them in case they – fail to prevent such incident (if it hasn't occurred yet); or if they fail to promptly apprehend and institute criminal proceedings against the culprits involved.

In *Vikas Yadav v State of U.P.*²⁷, the Supreme Court held that one might feel “My Honour is my life” but one’s honour cannot be allowed to be sustained at the cost of another. The court categorically stated that an individual’s freedom and personal liberty cannot be curtailed especially not by threats or use of force. A woman’s individual choice is to be construed as her self-respect and any infringement upon this is destruction of her honour.

²⁶ (2011) 6 SCC 405.

²⁷ (2016) 9 SCC 541.

Conclusion

“There is nothing honourable in honour killings, and in fact they are nothing but barbaric and shameful acts of murder committed by brutal, feudal-minded persons who deserve harsh punishments.”²⁸

The Supreme Court in the landmark judgment of *Common Cause v Union of India*,²⁹ stated that an individual’s liberty rests on their ability to make autonomous decisions including how to dress, when and what to speak, whom to love etc. and having complete control over their own personal lives.

Honour killing decapitates individual autonomy and freedom of. It has to be borne in mind that when two adults consensually choose each other as life partners, such right has the sanction of constitutional law, since the manifestation of their choice is recognized and protected under Articles 19 and 21 of the constitution. Therefore, such right cannot succumb to the conception of class honour or group thinking which is conceived of on some notion that does not have any legitimacy, even remotely.³⁰

The violation of the constitution is the fulcrum of the issue, the protection of rights is pivotal. In spite of constant social advancement, the menace of honour killing persists in the same way as history had seen under the Code of Hammurabi, in 1750 BC. The people involved in such crimes forget that they cannot tread an illegal path, breaking the law and offer jurisdiction with some moral philosophy of their own. The law of the land requires implicit obedience and profound obeisance. The inherent human rights of a daughter, brother, sister or son cannot be mortgaged to the so-called or so-understood honour of the family, clan, or the collective. An act of honour killing puts the rule of law in a cataclysmic crisis.³¹

²⁸ Ibid.

²⁹ (2018) 16 SCC 368, 405. p. 346.

³⁰ Shakti Vahini v U.O.I., (2018) 7 SCC 192.

³¹ Ibid, p. 39.