

Restitution Of Conjugal Rights Under Hindu Law

Ku.R.JAYAH^{1*}, Dr. PRABHA S. NAIR²

¹Ph.D. Scholar, Saveetha School of Law, Saveetha Institute of Medical and Technical Sciences (SIMATS), Chennai- 600077.

²Associate Professor, Saveetha School of Law Saveetha Institute of Medical and Technical Sciences (SIMATS), Chennai- 600077.

*Corresponding Author: - Ku.R.JAYAH

*Ph.D. Scholar, Saveetha School of Law, Saveetha Institute of Medical and Technical Sciences (SIMATS), Chennai- 600077.

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Abstract

In this article we will study about restitution of conjugal rights. Conjugal Rights refer to those rights which are accrued upon the persons by status of being married. There has been a constant debate relating to constitutionality of restitution of conjugal rights, for this it is necessary to understand the topic in detail. There are certain elements which need to be proved that the rights of the person have been truly violated; these are that there should be actual withdrawal by either the husband or the wife, from the society of other partner; it should be without a reasonable cause. This decree ensures that the person can force his partner to live with him or her against that partners will. Thus, this act of forcing the person to live with the person against the will was challenged in the court of law. It was first observed in the case of T. Sareetha Vs T Subbaila,¹ in which the court held that the decree was unconstitutional as it is violative of certain rights of the person guaranteed under the Indian constitution, and it was immoral to force any person to live with a person against will. It was after some time that the High Court of Delhi in case of Harjinder Singh Vs Harvinder Kaur² held that the decree was constitutional as it is a positive relief which aims to protect the marriage rather than end it on a small matter. This view of the High court was supported by the Supreme Court in the case of Saroj Rani vs Sudarshan Kumar Chadha,³ and it also declared the decree as constitutional and overruling judgement of the lower court given in the case of T. Sareetha Vs T. Subbaila.⁴ In this article we will also study about decree for restitution of conjugal rights from an international perspective and also try to analyse the same from judicial as well as societal point of view to finally decide whether the same is still relevant in today's time or not.

Key Words: Restitution, Conjugal rights, Hindu Law.

INTRODUCTION

Hindu Law has been wedded to notion that on marriage husband and wife become one. Marriage as an important institution has been accepted in the personal laws of all the religions. The particular fall out of the common law doctrine of unity of personality was that one spouse could not sue the other. The passage of time, complexity increased with areas of divorce, judicial separation and conjugal rights came up in personal law and it became necessary to codify the laws relating to marriage in India. The result was that the only remedy that a deserted spouse had against the other was the petition for restitution of conjugal rights.⁵ the remedy of restitution of conjugal rights is a positive remedy that requires both parties to the marriage to live together and cohabit. Marriage under all matrimonial laws imposing certain marital duties and gives to each of them certain legal rights. The necessary implication of marriage is that parties will live together. Each spouse is entitled to comfort of the other. After the solemnization of marriage both husband and wife are legally bound by the law to maintain their conjugal life together. If either of the spouse depart from the other then the aggrieved spouse may acquire a statutory matrimonial relief guaranteed under the codified personal law to restore their status of the other subject to validation of certain facts. This can be done by filing a petition in court seeking for resumption of cohabitation. This right is known as Restitution of Conjugal rights.⁶

STATEMENT OF THE PROBLEM

The Indian society and precisely the Hindu Society are passing through a phase of transition. Alongside the changes in various aspects of society and culture, changes have also come about in the position of Hindu women. In fact, "a new concept of womanhood is gradually emerging In India which is at odds with the traditional concept of Hindu woman as a devout wife confined to hearth and home." The consequent result of such a change has been an enlargement of rights of the Hindu women. The problem in fact is that despite the empowerment of Hindu women, certain rights granted to her remain illusory. Men, and women, though belong to the same human species; Hindu law has treated them differently in some respects.⁷ "Although the reformed Hindu law is projected as the ideal piece of legislation which liberated Hindu women, the underlying motive of reform was consolidating the powers of the state and building an integrated nation. This crucial objective could be achieved only by diluting women's rights to arrive at a level of minimum consensus so that the agenda of reform could be affected without much opposition and several customary rights were sacrificed to arrive at uniformity. The statutes that were finally enacted were merely ornamental instead of being markers of genuine and concrete efforts at rectifying the gender discrimination written into Hindu law."⁸

RESEARCH OBJECTIVES

The issue of women's rights and especially those of the Hindu women has always attracted the attention of the researcher. The codified Hindu law has been held up as a model of reform, glossing over the fact that this codification has not been able to arrest the trend of increasing violence towards and even murder of young Hindu brides in their matrimonial homes, to curb Hindu bigamy nor protect Hindu wives from poverty and destitution.⁹

SCOPE OF THE STUDY

The scope of the present research work is to study the status and position of the Hindu women under the Hindu law ever since the Vedic age to the modern times and to critically analyze the rights granted to them at various stages of development of Hindu law. In the present work, an attempt has been made to study the changes brought about in the rights of women under Hindu Law owing to social change and codification¹⁰. Though the present set up of laws talks exhaustively of gender equality, the present research work explores the existing realities and bias in the laws.

CONSTITUTIONAL RELIEF

The remedy of Restitution of Conjugal Rights is a new for the Indian matrimonial jurisprudence that finds its origin in the Jewish laws¹¹. The remedy was unknown to Hindu law till the British introduced. In fact it is the only matrimonial remedy which was made available under the British rule to all communities in India under the general law¹². Restitution of conjugal rights has its roots in feudal England, where marriage was considered as a property deal and wife was part of man's possession like other chattels¹³.

1. The other spouse has withdrawn from the society of the petitioner.
2. There is no reasonable excuse for such withdrawal. Should the respondent allege reasonable excuse, the burden of proof lies on him or her.
3. The court satisfied as to the truth of the statements made in the petition.
4. No legal grounds exist for refusing the decree.

There is withdrawal from society when one of the spouses, without reasonable excuse, terminates an existing relationship with the intention of forsaking the other, and permanently or indefinitely abandoning such relationship. Thus, while a husband and wife might be at times living apart, but maintaining a frequent and regular social and conjugal relationship, in such a case there would be no withdrawal from society. So after the solemnization of the marriage if either of the spouses without reasonable excuse withdraws himself or herself from the society of the other then aggrieved party has a legal right to file a petition in the matrimonial court for restitution of conjugal rights¹⁴.

During the time of introducing the provision for restitution of conjugal rights in the Special Marriage Act, 1954 and the Hindu Marriage Act, 1955, there were heated debates in the Parliament for and against it. It is significant to note that in 1983-1984, the constitutional validity of section 9 of Hindu marriage act 1955¹⁵ became a subject matter of debate as a result of these case laws-

- The constitutional validity of the provision for restitution of conjugal challenged before the Andhra Pradesh High Court in *T.Sareetha V. T. Venkatasubbaiah*¹⁶ In this case sareetha claimed that section 9 of the Act is liable to be struck down as violative of the fundamental rights in part III of the Constitution of India, specifically Article 14 and 21. Justice Choudary¹⁷ held that section 9 is a savage and barbarous remedy, violating the right to privacy and human dignity guaranteed by Article 21 of the Constitution. It denies the women her free choice whether, when and how her body is to become the vehicle for the procreation of another human being. The woman loses her control over her most intimate decisions. Clearly therefore, the right to privacy guaranteed by Article 21 is flagrantly violated by a decree of restitution of conjugal right. As a result the section 9 of Hindu marriage act 1955 was unconstitutional.
- In fact, Justice Rotagi in *Harvinder Kaur V Harminder*¹⁸ Singh recognised that "the legislature has created restitution of conjugal rights as an additional ground for divorce".
- In *Shakila Banu V. Gulam Mustafa*,¹⁹ 1970, the Hon'ble High Court observed: "The concept of restitution of conjugal rights is a relic of ancient times when slavery or quasi-slavery was regarded as natural. This is particularly so after the Constitution of India came into force, which guarantees personal liberties and equality of status and opportunity to men and women alike and further confers powers on the State to make special provisions for their protection and safeguard."
- Ultimately Supreme Court in *Saroj Rani V. Sudharshan*²⁰ gave a judgment which was in line with the Delhi High Court views and upheld the constitutional validity of the Section 9 of the Hindu Marriage Act, 1955 and over-ruled the decision given in *T. Sareetha V. T. Venkatasubbaiah*²¹. Here the some Para of the Saroj rani case judgment.
- In para 87 the learned Judge recognizes restitution of conjugal rights is an archaic remedy "I cannot agree that S.9 is unconstitutional howsoever the remedy may be outmoded or out of tunes with the times. The restitution decree in the scheme of the Act is a preparation for divorce if the parties do not come together".
- Para 91 shows the true intention of the Judge "in the end I will repeat what I have said before it is for the legislature to abolish the remedy of restitution and not for the Courts to strike it down in the ground that it is unconstitutional.

PARENTAGE AND RELATED RIGHTS OF WOMEN UNDER HINDU LAW

Parentage or parenthood is a concept which covers within its ambit the important rights exercised by a person as a parent. There are certain rights which flow from parenthood and are provided for in almost all legal systems. In the present

context, the focus shall be upon the right of a mother to the custody and guardianship of her child and also the right to adopt a child and give a child in adoption under Hindu law²². Guardianship implies the ability to exercise rights over the child's person and property. Custody implies the responsibility of raising a child. It cannot be disputed that both the mother and father are equally important in the life of a child, still the father was favoured in issues of proprietary rights and the mother's role was that of a care taker of her children. The ancient Hindu society was organized on the basis of the joint family system which was more inclusive. Within this social organization, there was sufficient protection for all minors and dependants. The minors were always deemed to be in the care and protection of the Karta as well as the elders in the joint family. Within this social structure, even an orphan child was awarded protection. Hence, the notion of guardianship and custody as known today did not evolve under the Hindu law. All the minors and students were considered to be under the protection of the King. The property of the minors was also to be protected. The stress was on the role of a father, not recognizing the role of the mother as a guardian. The law of guardianship as it developed in India was greatly influenced by the British rule. The British government had two important tasks. One to collect land revenue and the other was litigation. Thus, slowly it became important to enact some legislation to collect revenue from minors and to represent the minors in litigation concerning property or revenue matters. Thus the need arose to enact suitable legislation on the subject of guardianship. The English law also started influencing the personal laws of Hindus and Muslims.

RIGHTS OF WOMEN UNDER HINDU LAW

There have been certain issues which are intrinsically related with personal law, yet have been out of the purview of the same due to some reason or the other. For example issues like marital rape, domestic violence, dowry related incidents, and female feticides and infanticide are issues related with rights of women. Hindu Law has not taken up any of these specifically. However, there are various legislations regarding some of these issues like the Dowry Prohibition Act 1961, The Protection of Women from Domestic Violence Act, 2005, the Prohibition of Child Marriage Act, 2006, Pre-Conception and Prenatal Diagnostic Techniques (Prohibition of Sex Selection) Act, 1994²³ etc. Such allied matters have completely been out of the purview of Hindu Law. This may have been partly because these issues relate to women of all religious communities, and probably there was need to bring all women under the purview of these laws. Thus, even if these issues are not directly within the ambit of Hindu law, they are related being allied matters and give rise to certain inalienable rights of women including the Hindu Women. It appears that no research work regarding women rights can be complete without taking up an analysis of these issues. Hence, the chapter on related laws studies the prevailing social evils and their impact on the women's rights movement. An attempt has been made to critically analyze the laws which aim to vindicate the position of women and place her at par with the men folk. Certain provisions of the Convention on Elimination of all forms of Discrimination against Women, 1979 have also been discussed as the convention has a direct bearing upon the enactment and implementation of domestic laws which aim to end discrimination against women. The rights of women are definitely dependent upon the status they enjoy in a society. However, in modern times, to improve the status of women, we have empowered them with rights. However, in the humble submission of the researcher it seems that any right can be fruitfully enjoyed only if the society allows the exercise of such rights by doing its corresponding duty. Thus, if society is not ready to accord complete acceptance to such rights, their existence becomes merely illusory. Thus, a complete social change which is reflected in the attitudes and mind-set of people can be the only solution to reach a completely egalitarian set up. In this regard, role of law nevertheless, cannot be undermined. In establishing the boundaries of acceptable behaviour, law creates new behaviour patterns which frequently produce new attitudes. Law not only regulates, then, it educates and inculcates; it changes the values of society.⁶³ Thus, if this is so, then why law has not achieved the true purpose. Here we may note that law is better understood as a catalyst of change rather than singular effecter of change. The ability of law to produce social change is probabilistic, contingent and sequential. If a law is enacted it is probable that certain changes will follow, but the degree of change is contingent on certain circumstances prevailing. Law in other words is no talisman. It is not self executing. In fact amount of change brought by law shall depend upon the cost-benefit calculus (i.e. if individual determines that he stands to suffer a greater loss from obedience than disobedience, he will break law. If he judges that he will suffer greater loss by disobedience, he will comply). Hence, for our laws to become an instrument of social change, it is a necessity that society should be educated about the loss arising from their disobedience. In this direction it is of utmost importance that laws should be more stringent so as to truly create an apprehension of loss from disobeying them. The process may have many hurdles which shall have to be overcome. Apart from this, change in social attitude and institutions cannot be brought about abruptly. It is necessary to accelerate the change and the onus of the same i.e. changing social attitude and consequently the status of women has to be shared by both the government and community. Role of voluntary organizations, educational institutions and media would thus be indispensable to launch a campaign for dissemination of Information about legal rights of women and how they can exercise them.

STATUS OF WOMEN UNDER HINDU LAW

The contradiction in attitudes towards women has continued from the Vedic era to the contemporary times. On the one hand, they are regarded as the highest embodiment of purity and power—a symbol of religiousness and spirituality; on the other, they are viewed essentially as weak and dependent requiring constant guidance and protection. The birth of a male child is still considered necessary. There has been a trend towards the increase in crimes against women. The laws seem to have had little effect as a deterrent. The main reason is that the trial lasts for a number of years and the conviction rate is low. There are many loopholes in our criminal justice system because of which the offence may not get proved. Thus

the fear of being punished is hardly there among the perpetrators of crime²⁴. A woman is constantly under fear of an assault by a stranger or harassment by her husband and his relatives for dowry or on baseless suspicion. The tables below highlight the rise in number of reported cases for some types of crime against women and also the disposal of rape cases by the courts in the year 2019.

Table-1 Rise in the Number of cases Reported in India

Cases	2017	2018	2019
Rape	15,468	18,359	21,397
Kidnapping and abduction of women	15,962	17,414	25,741
Molestation	32,311	34,175	38,711

Source: govt.in National Crime Records Bureau.

The National Crime Records Bureau had termed rape as “India’s fastest growing crime”. According to the NCRB, in 2019 a total of 21,397 rape incidents, 25,741 cases of kidnapping and abduction of women and 38,711 cases of molestation were reported country wide,.

Table-2 Disposal of Rape Cases by the Courts in 2019

Total cases for trial (including previous year)	84,940
Convicted	3,698
Acquitted or discharged	10,066
Compounded or withdrawn	134
Pending trial at the end of the year	71,042

Source: govt.in National Crime Records Bureau.

That large number of young girls in India are married at a tender age and subjected to marital rape. Women are harassed and humiliated for dowry and killed by burning, poisoning, drowning or any other such cruel method if the demand is not fully met. The fact that women, especially minor girls, are sold and bought as chattel in the flesh market shows that they are not even treated as human beings. In India, thousands of dowry murders are committed each year. The Dowry Prohibition Act 1961²⁵ seems to have failed completely to put an end to this trend. Since those giving as well as those accepting dowry are punishable under the existing law, no one is willing to complain. It is only after a “dowry death” that the complaints become public.

THE LAW OF GUARDIANSHIP AND CUSTODY: NEED FOR CHANGE

It has been seen that the Law of Guardianship and Custody was not free from gender bias. The Law Commission of India took note of the same first in 1980 and then again in 1989. However, changes to the law were made as late as 2010. The restitution of conjugal rights is one of the reliefs that are provided to the spouses in distress in the institution of marriage by law. Decree of restitution of conjugal rights could be passed in case of valid marriages only. Apart from legislation relating to matrimonial law, courts in India in case of all communities have passed decrees for restitution of conjugal rights.

HINDU

Section 9 of the Hindu Marriage Act, 1955 provides for the restitution of the conjugal rights. The aggrieved party may apply, by petition to the District Court, for the restitution of conjugal rights. One of the important implications of Section 9 of the Hindu Marriage Act, 1955 is that it provides an opportunity to an aggrieved party to apply for maintenance under Section 25 of the Hindu Marriage Act, 1955. The legal grounds for refusing to grant relief are:

- For instance, any ground on which the respondent could have asked for a decree for
- judicial separation or for nullity of marriage or for divorce;
- Reasonable excuse for withdrawing from the society of the petitioner;
- Any conduct on the part of the petitioner or fact tantamount to the petitioner taking
- advantage of his or her own wrong or any disability for the purpose of such relief;
- Unnecessary or improper delay in instituting the proceeding.

MUSLIM

If the husband either deserts a wife or neglects to perform his marital obligations without any proper reason, then the wife can apply for restitution of conjugal rights. Even husband can apply for restitution of conjugal rights. But the court can refuse to grant order of restitution of conjugal rights for following reasons:

- Cruelty by husband or in-laws
- On the failure by the husband to perform marital obligations
- On non-payment of prompt dower by the husband.

CHRISTIAN

- A Christian husband and wife can also apply for an order of restitution of conjugal rights.
- The Court cannot pass the decree for following reasons:
- Cruelty of husband or wife
- If either of the spouse is insane
- If any one of the spouse marries again.

SUGGESTIONS

- The court develop the new process regarding right of restitution of conjugal rights for this the might be authorized to appoint a committee for reconciliation.
- Instead of the judge, sitting as one of the committee member's let some eminent person/s of the society do the job.
- The committee formed is a semi-independent committee to the extent that it is appointed and supervised by the Court.
- This committee must be guidance of an expert, counselor or psychiatrist.
- The procedure should be liberal as termed counseling.
- If the committee fails in the counselling even after taking expert's help let this be viewed as failure of the marriage and be treated as a ground for divorce. If not treated as a ground for divorce then the parties will go back to Courts and the whole procedure of counselling will be a mere mockery.

CONCLUSION

The Hindu society has been patriarchal from the beginning. The personal law of the Hindus traditionally was based on patriarchal notions. Thus, women under Hindu law were denied several rights. The transition from the rigorous law of the ancient period to a liberal and humane law of modern era took several centuries. The process of reform has been ushered by enactment of ameliorating laws to check social injustice towards women. Marriage is a pure relation between two person but it is not right to only prevent for this relation force to live together However, there is a bigger debate we need to dwell into. The restitution of conjugal rights is a part of the personal laws of the individual, thus they are guided by ideals such as religion, tradition and custom. A very important feature of restitution of conjugal rights to be emphasized is that it is a remedy is aimed at preserving the marriage and not at disrupting it as in the case of divorce or judicial separation. It serves to aid prevention of the breakup of marriage, thus is a means of saving the marriage. The decree of restitution of conjugal right or right to stay together is not obeyed for a period of more than one year, subsequent to the date of the decree; it becomes a good ground for divorce. So the restitution of conjugal rights remedy tries in promoting reconciliation between the parties and maintenance of matrimonial. It tries to protect the society from denigrating. But the final decision is that of the parties whether to obey the decree of restitution of conjugal rights and to continue with the matrimony or not.

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