

## Combating Domestic Violence amidst Social Isolation and Covid-19

Sheeba S. Dhar\*

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### **Abstract**

This paper explores the situation faced by women in the family atmosphere during the pandemic-imposed lockdown and the inability on the part of the State and its machinery to provide access to instant remedies against domestic violence as envisaged under the Protection of Women from Domestic Violence (PWDV) Act, 2005. The concept of *parens patriae* (parent of people) has proved to be in existence only nominally during the contingency. Many of the well framed statutory protective mechanisms including the constitutional machinery of the Judiciary have failed to provide a helping hand to the tortured women everywhere. The social isolation strategy adopted to tackle the Covid-19 epidemic has accelerated the age-old shadow of domestic violence. A doctrinal study is undertaken to analyse the existing legislative and judicial measures against domestic violence, especially in the context of rising domestic violence during the pandemic. The objective of the paper is to identify the victimisation faced by women during the pandemic and the difficulties they face in accessing the redressal mechanisms stipulated under the PWDV Act. To reach the victims of domestic violence, and to free and save them from the clutches of respondents<sup>1</sup> with the help of legislations is not sufficient. To deal with such an unexpected new normal scenario, it is necessary to find an alternative mechanism whereby an instant remedy, more than which is perceived under the PWDV Act, could be provided to victims of domestic violence. The methodology adopted for this paper is basically doctrinal. The legal framework at the national and international levels to curb the menace of domestic violence is brought in for the structuring of rights and obligations.

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\* Centre for Women and Family Studies, National University of Advanced Legal Studies, Kochi-683503, Kerala, India. Email: advsheebasdhar@gmail.com

<sup>1</sup> The term means the opposite party and here in the case of domestic violence it refers to perpetrator of violence. The term is used subsequently also in the paper, as defined under the Act 2005 and judicial decisions.

An analysis of the present Covid-19 pandemic based on the reports available offline and online is also undertaken. Judicial decisions form the building bricks for the establishment of constitutional rights and its affirmation. Hence a systematic analysis of Supreme Court decisions is also undertaken to complete the research paper.

**Keywords**

social isolation, domestic violence, family, judicial decisions

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**Introduction**

As a prominent strategy adopted to tackle the Covid-19 pandemic by nation-states worldwide, social isolation silently perpetuates the so-called routine violence taking place within the four walls of privacy. After tremendous efforts from different walks of life, including aspirations in international instruments exclusively as reflected in the Convention of Elimination of All Kinds of Discrimination against Women, the right to protection of women against harassment taking place in private spaces is finally recognised and redressed. As human beings are social animals, any sort of restriction on intermingling with fellow beings is likely to affect the mental and indirectly the physical stability of both men and women. As invariably appreciated even in feminist theories, particularly cultural feminism, the ability of women to manage and safeguard relationships has always put them on a higher pedestal. However, the reality shows they are subjected to violence from the trivial to the non-trivial. The pandemic period has proved to be a critical life challenge for women everywhere.

The first and foremost social institution that humans beheld over the years is Kula, the family. For the family enterprise to succeed, it should be nourished with love and care involving many sacrifices from both partners. Unfortunately the family, which was perceived as an arena of love, affection, gentleness, and the centre of solidarity and warmth, has now become the seat of exploitation, assault, and violence which essentially affects the personhood of women and amounts to gross human rights violations. This situation has been further worsened by the isolation strategy adopted to control the menace of Covid-19.

Social institutions are the foundations of the State. Family, economy, religion, education, and government are the five major social institutions, which is quintessential for the doable and worthwhile existence and functioning of the State. Marriage is the basis of family, and family is the basis of society and State. This fact is often justified for socialisation,

regulation of sexual activity, social placement, material, and emotional security. There has been a drastic change in the relationship because of various factors such as modernisation, western influence, and education, social reform practices, changing gender perspectives, and its recognition even to the extent of casting its reflection and further affirmation in the judgments of the superior courts.

An oft quoted statement that from the cradle to the grave or from womb to tomb, women face atrocities and cruelties degrading them to the worst existence has again proved true on account of the staggering situations the media brings to light each day. Hence a shift in emphasis and perceptiveness on the concept of the family and marriage is inevitable. It is important to secure the life and safety of women at large, irrespective of the situation, whether amid the pandemic or post-pandemic.

Protection of one's bodily and personal integrity is one of the inherent human rights. To ensure this, the domestic framework in India is rich in the form of laws starting with the Constitution, especially the right to a dignified life, fundamental freedoms and equality under Article 21, Article 19 and Article 14 respectively, criminal sanctions under the Indian Penal Code, and the Dowry Prohibition Act to the Protection of Women from Domestic Violence (PWDVA) Act, 2005 which is a gender-specific legislation to uproot the evil of domestic violence. These legislative measures have brought in remarkable changes to the existing situation, although they are criticised. These have made the right to a dignified life and the right to womanhood and personhood wholly within the hands of the State, the ultimate protector and guarantor of basic human and fundamental rights. Considering the reality that women are the centre of the social institutions of the family and marriage, being the mother of progeny is pivotal for society to exist.

The two major factors essential for the successful implementation and achievement of the objectives of any legislation are internalisation and institutionalisation. The absence of society's support can prove detrimental even with the satisfaction of the other components like potential machinery or institutions in the positive law and *vice versa*. Law cannot stand still when society for whose benefit laws exist moves towards a blind alley. The present pandemic, which witnessed several regulations curbing free movement of people to prevent the spread of the virus and furthering a healthy environment, has put a heavy burden on the weaker section of society, the women. On the one side, the isolation strategy is accepted as

an affirmative measure to prevent the spread of Covid-19 but on the other side, it has augmented the violation of basic human and fundamental rights and the expressly conferred substantive rights of women.

The objectives of the study are to find alternative mechanisms to instantaneously redress the grievances of women along with making the existing machinery under the specific legislation more effective and responsive. To reach a solution it is necessary to identify the drawbacks of the governmental machinery envisaged under the positive laws. Analysing the factors which form the basis of domestic violence further helps to frame policies and schemes to uproot the evil of domestic violence and is summarily attempted here. For that, restructuring of society's basic notions and structure and simultaneously reinterpreting rights and duties on the part of the judiciary is necessary. How far the judiciary succeeded in making use of its interpretative techniques and transformative competence to deal with the concerns of women is also evaluated. This paper finally attempts to suggest the sort of intervention required to deal with the menace of domestic violence.

The methodology adopted for this paper is basically doctrinal. The legal framework at the national level, namely the PWDV Act, and international conventions to curb the menace of domestic violence is brought in for the structuring of rights and obligations. Articles 1,2,3, and 25 of the Universal Declaration of Human Rights 1948, Articles 3,6,9 and 26 of the International Covenant on Civil and Political Rights 1966, Articles 1,2,3 and 10 of the International Covenant on Economic, Social and Cultural Rights 1966, Articles 1,2,15(1) and 16(1) of the Convention on Elimination of All Forms of Discrimination Against Women 1979, the Vienna Accord of 1994, and the Beijing Declaration and Platform for Action 1995 are summarily analysed to understand the nature of rights and the extent of the protection of women against violence and specifically domestic violence. An analysis of the present Covid-19 pandemic based on the reports (OECD, 2020; UN, 2020) and articles and books available offline and online is also undertaken. Judicial decisions form the building bricks for the establishment and affirmation of constitutional rights. Hence a systematic analysis of Supreme Court decisions is also undertaken to complete the research paper.

### **The Concept of Domestic Violence**

Domestic violence reflects the behaviour in which a more powerful person takes advantage of and abuses a less powerful one (Ahuja, 1998). It is dangerous and destructive behaviour, which damages the victim physically,

mentally, and financially (Misra, 2006). It is an extraordinarily complex form of violence committed within the four walls of the family and/or within a particular deep-rooted power dynamic and socio-economic structure, which itself does not allow even the acknowledgment or recognition of this violence. Judith Lewis Herman has defined domestic violence as a tyranny of private life (Herman, 2015).

Following efforts from different walks of life, namely initiatives undertaken by women's organisations and the assertion of rights by international human rights instruments such as the Convention on Elimination of All Kinds of Discrimination against Women 1979 (Brownlie and Guy, 2010) national level protection was guaranteed. In India, the right to protection against harassment taking place in private spaces is finally recognised and redressed through the PWDA Act, 2005. Section 3 of the Act defines domestic violence as any act, omission, or conduct which is of such a nature as to harm or injure or has the potential of damaging or discolouring the health, safety, or wellbeing of the person aggrieved or any child in a domestic relationship. It includes physical abuse or a threat of physical abuse, sexual abuse or a threat of sexual abuse, verbal and mental abuse, and economic abuse. The Act is a laudable legislation, for the first time it grants women substantive rights such as the right to residence in a shared household under Section 17, protection orders under Section 18, residence orders under Section 19, monetary reliefs under Section 20, custody orders under Section 21 and compensation orders under Section 22. It provides them with instant remedies and recognises the role of the State and its machinery to intervene even in private matters. The instant remedies made available through protection officers and service providers have proved to be beneficial to the victims at various levels. However, the number of such protection officers and service providers are significantly less than the demand on the part of the victims, but the significant steps taken to improve the condition of the womenfolk in the country cannot be neglected.

Violence against women represents a global health issue. Worldwide, more than one in three women experiences violence from an intimate relationship or otherwise in their lifetime (OECD, 2020). This crisis has been worsened by Covid-19 and the inappropriate manner in which it was dealt with. Adding fuel to the fire, the pandemic has brought dismay to their lives as far as women of all ages and families are concerned.

### **Causal Analysis and Theories**

Predominantly four factors (Sharma, 1997) are considered to be the predators of the prevalence of violence against women. They are economic inequality between men and women, a pattern of using physical violence to resolve conflict, male authority and control of decision making, and finally, restriction on the women's ability to leave the family settings. All the factors are found in the newly created life situations due to Covid-19 preventive measures, which recreated all the elements that were somehow balanced with the previous machinery and legislations.

Many of the theories (Misra, 2006) deal with the real cause of domestic violence. The major theories are the feminist theory, the family system theory, the psychological and physiological theory, the psycho-pathological theory, socio-psychological theories, and socio-cultural theories. The feminist theory expresses domestic violence as male coercion of women. Emphasising gender and power, the theorists state that domestic violence reflects the unequal power of men and women in society and is the result of the patriarchal structure of society. Social arrangements in which the man holds the position of respect and power in the community and the nature of both man and woman alike in devaluing femininity and over-valuing masculinity all contribute to domestic violence. Men often resort to violence in disciplining wives and children, and men's feelings of superiority by being in total charge of the family adds much to the aggravation of domestic violence.

The family system theory (Misra, 2006) considers family structure to be a system of social relations with unique properties that make it a fertile ground for violence. There is a lack of social control of behaviour within the intimacy of the family, and it serves to cloak or hide violence in the family. The psychological theory focuses on individual problems and holds that personality disorders or experiences of trauma predispose individuals to domestic violence. People with such disorders may choose partners with whom they can re-enact the dysfunctional relationship of their parents. The physiological theory (Ahuja, 1998) focuses on genetic and hormonal nature as the root causes of violent behaviour in men rather than in women.

The psycho-pathological theory (Misra, 2006) concentrates on the personality characteristics of offenders and victims as the chief determinants of violence. It offers two explanations for violence. Violence against women arises from the offender's psychological problems like depressive

impulsiveness, and uncontrolled emotions. The other is that violence occurs out of the psychological problems of victims. However, it is impossible to say that the psychological problems of women are always the cause of violent behaviour. Such unusual behaviour by women is possibly the consequence and not the cause of being battered or abused.

Socio-psychological theories (Ahuja,1998) emphasise external environmental factors that exercise impact on an individual offender. Factors which emerge or are created in society on account of the actions of others may lead to behavioural changes in an individual. *In toto* social factors having psychological ramifications are envisaged here. Consequent results of such external environmental or social factors would be frustration, perversion, self-attitude, the cycle of violence, learned helplessness, and survivorship. On the other hand, socio-cultural theories describe domestic violence as socially structured inequality, social and cultural attitudes, norms regarding anti-social behaviour and interpersonal relations. This theory underlines socio-structural factors such as economic conditions, inadequate housing, relative poverty, lack of job opportunities, and unfavourable and frustrating work conditions. If structural elements prevent expectations from being realised, frustration results, and violence may ensue. Domestic violence, which is seen to have been triggered during the pandemic, describes the foundations relied upon by various theories.

Social isolation, as the conspicuous strategy adopted to tackle the Covid-19 pandemic by nation-states worldwide, turns out to be silently perpetuating the so-called routine violence taking place within the four walls of privacy. Stay-at-home or lockdown orders were put in place almost everywhere. Schools were closed, employees were compelled to work from home even against their wishes, and many workers were furloughed and laid off. The resultant doubling of work for women employees and homemakers is the tragedy behind the enhanced lockdown restrictions. Even amidst the worst situations, non-accessibility to a peaceful work atmosphere due to technical and other personal reasons added to their usual concerns. With personal movement limited and people confined to their homes, the potentiality of violence inside the home increases as victims are trapped with their abusers.

The isolation is not merely social isolation which separates the family and friends but it is equally functional, physical, or geographical isolation. It has the effect of parting the victim from peers or support systems although these appear to exist but are unreliable or may have alliances with the

perpetrator. Not even communication with neighbours is possible. There is a total reordering of life situations imposed by the pandemic, which puts control over the functions and roles of women in households.

The epidemic has changed people's life styles by having to spend too much time at home, which has been an inconvenience in their lives. Economic losses faced by almost all sections of society have further weakened people's psychological endurance. Economic insecurity, poverty-related stress, quarantine, social isolation, disaster and conflict-related unrest and instability, exposure to exploitative relationships due to changing demographics, reduced health service availability, the inability of women to escape abusive relationships temporarily, virus-specific sources of violence, and exposure to violence and coercion in response efforts, are all factors which are highlighted in socio-psychological and socio-cultural theories which proved the increased cases of domestic violence. The pandemic is just another addition to the episodes of violence.

From the point of the obligation of the State to secure a dignified and violence-free life for women, some efforts were initiated, but were not sufficient to fulfil the conditions of the doctrine of *parens patriae*, mainly because of the lack of prioritisation given to policy measures for handling the consequence of the pandemic. Existed or existing support services were/are also struggling. Protection officers, service providers, police, women cells, non-governmental organisations (NGOs) and health centres whose services are most often sought by women were overwhelmed or had changed priorities. Civil society groups were also affected by the lockdown due to the reallocation of resources.

Although the National Women's Commission, the statutory body entrusted with the core function of empowerment of women, promotion and protection of rights of women, made efforts it was not feasible for the victims to access. There were several restraining factors, which included restricted movement, limited access to modes of communication, reduced contact with the natal family which is the first point of contact for the victim, and above all the unavailability of the formal support system. Many of the officially published helpline numbers were barely responding during this time. Under the PWDV Act, the legal machinery was not identified as an essential service during the lockdown, hence the protection officers were not able to visit victims' households, NGOs could not have physical interactions with them, and the police officers being at the frontline in the effort to tackle Covid-19 were too overwhelmed to effectively help victims.



Due to the increased demand for services, domestic violence helpline numbers provided by the State machinery experienced the opposite. In some regions, the number of calls dropped. Although the initial inference at any point was to deduce the reduced cases of domestic violence, experts instantly realised that the presence of abusers prevented the victims from accessing any of the remedial measures or even make a safe connection to the helpline numbers provided.

It is true that social factors, especially during the pandemic, are causing substantial isolation. The public health restrictions put in place to combat the spread of the virus have reduced access to health care facilities connected with abuse-related physical and mental health problems. Although teleconsultation, online consultation, video consultation, and telemedicine facilities were made available by hospitals, access to safe havens was also a problem for many victims because of travel restrictions. Many victims faced difficulties in finding accommodation in shelters or homes of family members and friends. Although some restrictions have been lifted on account of the surge in domestic violence cases, many shelters remain closed or operate at a reduced capacity, which aggravates the challenges for people who need alternative housing arrangements. Barriers to reporting during the pandemic were yet another hurdle they had to face. How police reports are filed varied among precincts, with some offering online options and others requiring in-person visits. Similarly, in the first wave of the Covid-19 attack, unlike the present situation, courts were not functioning, although some officers were designated to deal with such issues. To their surprise, they found a comparatively smaller number of cases being reported. Even concerning the filing procedure, no clear-cut idea was available, not even providing lawyers to assist these victims. Lack of a coherent and consistent process for reporting abuse deprived people of their rights to seek help through the legal system.

### **Analysis of the Judicial Response**

Over 15 years of the enactment and enforcement of the PWDV Act, the higher judiciary, namely the Supreme Court and High Courts, has done commendable work in protecting women's rights against intimate violence within domestic life through the progressive interpretation of the provisions of the law amidst a few initial retrogressive and narrow interpretations. It ranges from the interpretation of the terms shared

household, respondents, substantive rights, domestic relationship, vesting of jurisdiction in family courts and civil courts with various aspects of complaints, although jurisdiction to deal with such complaints is with a first-class magistrate's court.

The retrogressive interpretation of the objectives of the Statute could be seen in the initial stage of implementation of the Act when the Supreme Court in *S.R. Batra and Another vs. Smt. Taruna Batra* dealing with the term 'shared household' as defined in Section 2 (s) of PWDV Act 2005, declared that the wife could claim the right to residence in a shared household. The term would mean only the house belonging to or rented by the husband or the house which belongs to the joint family of which the husband is a member as per Section 17. The right to alternative accommodation can be claimed against the husband only and not against the husband's relatives or his parents. In this case, the property in question belongs to the exclusive ownership of the husband's mother. This judgment does not reflect the actual situation where many young couples live with parents-in-law and are not in independent households. The judgment has thereby limited the ambit of right to reside, which a progressive judiciary ought not to have pronounced. Nevertheless, progressive interpretation regarding the same point could be seen in *Satish Chander Ahuja vs. Sneha Ahuja*, where the Supreme Court clarified the position with respect to the terms 'shared household' and 'respondent.' Section 2(s) read with Sections 17 and 19 of the PWDV Act confers the right of residence under the shared household to a woman, whether or not she has a legal interest in the same. It also explained the position with respect to the term 'respondents' by specifying that both male and female members could be respondents in a complaint of domestic violence. Further the term 'adult male' as mentioned in Section 2(q) of the definition clause of the Act was already declared unconstitutional in *Hiral P. Harsora and Others. vs. Kusum Narottamasdas Harsora and Others.*

Another proactive and progressive judgment could be seen in *Veluswamy vs. Patchaiammal* on the issue of 'live-in relationships,' and its relevance continues today amid the pandemic. Justice Jaishree Thakur in *Soniya and Another vs. State of Haryana and Others* observed that the concept of a 'live in relationship' may not be acceptable to all. Still, it cannot be said that such a relationship is an illegal one or that living together without the sanctity of marriage constitutes an offense. Even a woman in a 'domestic relationship' or female live-in partners and the children of live-in couples have been accorded adequate protection under the Act.

On 4 June 2021, the Supreme Court in the case of Gurwinder Singh and Another vs. State of Punjab and Others came to the rescue of a couple who were denied relief by the Punjab and Haryana High Court in *Gulza Kumari vs. State of Punjab*, stating that a ‘live in relationship’ is socially and morally unacceptable. It is praiseworthy that the PWDV Act is the first Statute that recognises a ‘live in relationship’ and affords protection to aggrieved women facing violence in such relationships. These types of issues occurred even before the pandemic, and courts have been widely interpreting the provisions along with the right to personal liberty and freedom to choose under Article 21 of the Constitution.

Nonetheless, in the background of the pandemic, especially during the first wave of Covid-19, no court was functioning as if victims were left with no protective hands of the judiciary, which is considered the *sentinel on quivive* (watchful guardian). Women were facing the situation as if it has again become a purely private affair with the State not responding to this atrocity. Judicial response during the pandemic could be seen only in fragmented High Court decisions asking for clarification of steps taken on the part of the respective governments to deal with the issue of domestic violence. The Karnataka High Court, by a unique division bench, has asked the State government about the helplines and action taken on domestic violence complaints. The State, in its reply, stated that helplines, counsellors, shelter homes, and protection officers are working round the clock to help victims of violence. A scheme named Santhwana has been implemented in Karnataka to provide counselling, legal aid, and medical aid to victims of domestic violence. In Tamil Nadu, protection officers appointed under the Domestic Violence Act 2005 were allowed to move around during the lockdown, and some women in dangerous situations were rescued and moved to shelter homes. In Uttar Pradesh, the State government has initiated a special helpline for victims of domestic abuse under the title Suppress Corona, not your voice. In some States, the police have assured that once a woman complains, a woman officer will attend to it. Accredited Social Health Activist (ASHA), Anganwadi, and other frontline health workers’ support were initiated to counsel against domestic violence, and women were advised to report to these workers if they face abuse. In Kerala amid Covid-19, Domestic Conflict Resolution Centres were launched at the recommendation of the National Women’s Commission in 2020 and are associated with Vanitha Cell across the State.

However, these measures seemingly were not sufficient when the invaders are insiders themselves, and access to online facilities was missing.

### **Interventions**

At this point, it is necessary to evaluate the sort of interventions required in family violence, what behaviours the intervention should seek to influence, and how they relate to the problems of domestic violence. It is also inevitable to identify whether State intervention or community intervention lowers the rate of domestic violence. The change in approaches or attitudes due to gender sensitisation or modified behaviour on an understanding of newly acquired skills or knowledge may result in reduced violence and more safety. Reforms and suggestions (Evans et al., 2020) must be framed in line with the above aspects in mind.

Lockdown situations have compelled the State to frame and take strategic measures to deal with concerns already existing in society, along with the newly created pandemic and its destructiveness. Essential services cannot be avoided in any situation. Domestic violence faced by women in the pandemic has convinced all with such a similar urgency. To tackle that, all assistance services, including shelter homes and legal aid for victims of violence against women, should be classified as essential services and remain open during lockdown situations, not by mere declaration but must guarantee access to critical services and support measures for the most marginalised groups of women, including rural women. Expansion of the capacity of shelters and such assistance services for victims of domestic violence is also appreciated. Online hearings may be initiated by listing domestic violence cases as ‘urgent matters’ that can continue to be brought to court. In appropriate cases, hearings over the telephone or video conferencing may be permitted. Direct, immediate intervention and periodic reviews of services made available to victims and their dependents must also be done to ensure accountability. Ensuring equitable access to broadband internet service in people’s homes through a subsidy is inevitable when society becomes electronically dependent and events transpire in virtual mode. Above all, awareness creation should be accelerated through online platforms, television, radio, and other communication devices. Gender impact assessment should be done on an immediate and priority basis and policy and contingency measures formulated which prioritise

support for women to prevent gender violence. Strategies to prevent violence must be integrated into operational schemes of justice and security.

### Conclusion

As human beings are social animals, any sort of restriction on intermingling with fellow beings is likely to affect the usual mental and indirectly the physical stability of both men and women. The pandemic period has proved to be a critical life challenge for women. To deal with such an unexpected new normal scenario, it is necessary to find an alternative mechanism whereby instant remedy, more than that perceived under the PWDV Act, could be provided to victims of domestic violence. A lifeguard sort of machinery in collaboration with the community and with the resourcefulness of women welfare and empowerment organisations can do better, especially in the pandemic epoch where approaching the State machinery and capable guardians is rigid and unrealistic. Achieving gender justice and uprooting gender violence is a long journey indeed. National responses need to include specific communications to the public that justice and the rule of law are not suspended during confinement or lockdown periods. The precepts of the law are to live honourably, not to injure another, to render each his due.

“Honeste vivere, non alienum laedere, suum cuique tribuere.”  
(To live honourably: not to injure another, to give each his due).

(Caesar Flavius Justinian, 1913[2009])

### References

- Ahuja, R. (1998). *Violence Against Women*. Jaipur: Rawat Publications.
- Brownlie, I., & Goodwin-Gill, G.S. (2010) *Basic Documents on Human Rights*. Oxford: Oxford University Press.
- Justinian, C. F. (1913[2009]). *The Institutes of Justinian*. Translated into English by J.B. Moyle. [https://www.gutenberg.org/files/5983/5983-h/5983-h.htm#link2H\\_4\\_0002](https://www.gutenberg.org/files/5983/5983-h/5983-h.htm#link2H_4_0002) Retrieved 6 June 2021.
- Evans, L. M., Lindauer, M., & Farrell, E. M. (2020) “Pandemic within a Pandemic: Intimate Partner Violence during Covid-19.” *The New England Journal of Medicine*, 383(24), 2302-2304.
- Herman, J.L. (2015). *Trauma and Recovery: The Aftermath of Violence -From Domestic Abuse to Political Terror*. New York, NY: Basic Books.

- Misra, P. (2006). *Domestic Violence against Women: Legal Control and Judicial Response*. Delhi: Deep and Deep Publications.
- OECD (Organisation for Economic Co-operation and Development) (2020). Policy Responses to Coronavirus (COVID-19) Women at the Core of the Fight against Covid-19 Crisis, OECD 2020. <https://www.oecd.org/coronavirus/policy-responses/women-at-the-core-of-the-fight-against-covid-19-crisis-553a8269/> Retrieved 24 May 2021.
- Sharma, B.E. (1997). *Women, Marriage, Family, Violence and Divorce*. Jaipur: Mangal Deep Publications.
- UN. (2020). United Nations Policy Brief: The Impact of Covid-19 on Women. <https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2020/06/report/policy-brief-the-impact-of-covid-19-on-women/policy-brief-the-impact-of-covid-19-on-women-en-1.pdf> Retrieved 20 May 2021.

**Cases cited:**

- Gulza Kumari vs. State of Punjab, 2021 SCC On Line P & H 896.
- Gurwinder Singh and Another vs. State of Punjab and Others, SLP (Crl.) No. 4028 of 2021).
- Gurwinder Singh vs. The State of Punjab (Supreme Court Daily Orders, June 4, 2021).
- Hiral P. Harsora and Ors. vs.. Kusum Narottamdas Harsora and Others., (2016) 10 SCC 165.
- S.R. Batra and Anr vs. Smt. Taruna Batra, AIR 2007 SC 1118.
- Satish Chander Ahuja vs. Sneha Ahuja, (2021) 1 SCC 414.
- Soniya and Another vs. State of Haryana and Others. CRWP No.4533 of 2021.
- Veluswamy vs. Patchaiammal, 2010 (4) KLT 384 (SC).