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A Comparative Study of Live in Relationship in India with Other Countries

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ABSTRACT

Live in relationship have been there for many years, the only difference is that back then people were indecisive in revealing their status due to the fear of society, however a part of Indian population are openly accepting this kind of relationship in today's era. Although, this new form of family is unstable, it is natural and thus prevailing in western world. Therefore, it becomes necessary to know the rights & obligations for the partners living together without the marriage all around the world. In metropolitan cities of India this form has become an alternative to marriage where individual gives priority to freedom and people try to stay away from the responsibilities and obligations of a married life. The ambit and definition of live-in relationship is not much clear, there is lack of specific legislation in India on this subject as the laws to govern such relationship are in the form of court judgement. The verdict depends on the circumstances of each case. The paper will try to analyse the concept, legal status, and judicial approaches of live-in relationship in India in comparison with the countries abroad.

Keywords: *Live-in relationship, taboo, Indian society, foreign countries, legal status.*

I. INTRODUCTION

According to the Hindu Law marriage is a sacred social bond, it is considered as a holy union and through marriage one can perform his religious duties. The nature of marriage is both contract as well as sacrament. Marriages in Hindu Law for woman is protected by providing her legal rights² by providing for legitimacy of the children, relief for cruelty³, provision for adultery⁴, provision for maintenance and alimony etc⁵. In Indian society Live in relationships are generally considered as a sin and taboo. Lifelong social bond of marriage in India is being questioned by today's generation. If we talk about the legal definition of live-in relationship it is said to be "an arrangement of living under which the couples which are unmarried lives

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² *Hindu Marriage Act, 1955*, (Act 25 of 1955) Section 9 provides for restitution of conjugal rights in case of desertion.

³ *Hindu Marriage Act, 1955*, (Act 25 of 1955) Section 13 (1) (i) a) deals with the cruelty as a ground for divorce.

⁴ *Hindu Marriage Act, 1955*, (Act 25 of 1955) Section 13(1) (i) describe Adultery as a ground of divorce.

⁵ *Hindu Marriage Act, 1955*, (Act 25 of 1955) Section 25 deals with permanent maintenance or alimony.

together to be in a long going relationship similar to marriage.” This concept means ‘a male & a female living or staying together as a friend without getting married. The idea behind the live in concept is that before marrying people want to check the compatibility or they may establish financial security, to avoid divorce and to see the little differences between commitment to stay together as a couple without tying the knot of marriage and commitment to live in marriage. Therefore, there is a tendency mostly amongst youngsters to be into such kind of relationship instead of tying knot of marriage. We are aware about the fact that even being progressive, India is still a traditional country. The orthodox society of India is still not ready to give consent to the fact that there is no problem for a couple to live together without getting married. It is still considered as forbidden in the Indian society as people think it as immoral & improper relationship and as such it has not been consented by majority of population. So, the question arises that if the society accept live-in relationship in India or not. The opinion differs from people to people.

II. OBJECTIVES OF RESEARCH PAPER:

1. To analyse the current status of ‘live-in relationship’ in India and abroad.
2. To study the impact of ‘live-in relationship’ on Indian culture and tradition.
3. To Examine the reaction of Indian Judiciary to live-in relationship.
4. To provide suggestive measures in order to bring a balance between `individual liberty and Indian tradition.
5. To bring this matter within the ambit of fundamental rights being enshrined to the people through of the constitution of India as a right to personal liberty & choice.

III. LIVE-IN RELATIONSHIP: A PSEUDO MARRIAGE

This concept have been there for many years, but earlier people couldn’t reveal this relationship status explicitly as it was a matter of shame in Indian society we can say that people were hesitant, but now a part of Indian population are openly accepting this kind of association. By the term Live-in relationship, we mean that ‘a male & a female living together or staying together as a friend without marriage. Although it is a new kind of family, it seems to be unstable. We can say that it is a kind of relationship where one has open option to walk in or walk out of relationship whenever they want without even giving a reason for the same. This can be considered as an alternative to marriage with no stability.⁶ We can

⁶ Chakshu Thakral, Amit Chauhan “Live in relationship as a new form of family” (2018), <https://www.wisdomcrux.lawtimesjournal.in/index.php/2018/07/18/live-in-relationship-as-a-new-form-of-family/>

define this concept as an arrangement of living in which the unmarried couples live together to establish a long-term relationship as similar to marriage. This concept is not unusual in western countries. The idea behind the live in concept is that before marrying people want to check the compatibility or they may establish financial security, to avoid divorce and to see the little differences between living together in a committed relationship and living in a marriage. This form works as a substitute to marriage specially in metropolitan cities of India where individual freedom is given more importance where people does not want to get involved into a married life and take the responsibility of the same. Live-in partners today are in large numbers which makes the institution of marriages unaffected. However, in India it has not been consented by majority of population. Still it is regarded as a taboo in the Indian society as people think it as immoral & improper relationship.

IV. LEGAL STATUS OF LIVE-IN RELATIONSHIP IN INDIA

The concept of this relationship in India is unrecognized by the Act provided for the marriage.⁷ The other Acts has also not given any sort of recognition to it.⁸

Further in the opinion of supreme court if a couple lives with each other without marriage they do not commit any offence thus when two adults decide to live together it does not constitute a crime. Living together is not an offence. Live in relationship cannot be considered as a crime as observed by 3 judge bench consisting of 'C.J. K.G. Balakrishna, Deepak Verma and BS Chauhan'. In the opinion of the apex court there is no prohibition by any law on live-in relationship or pre- marital sex.

The supreme court firstly recognised this concept in India in a case where the court gave validity to this couple as they were living together for fifty years without marriage⁹. The high court of Allahabad in a case recognised this concept¹⁰, and said that live in relationships are not unlawful which means two persons can stay together even without marriage. It may be considered as a shame and immoral for society but not unlawful in any sense. In a case the supreme court held a couple will be considered same as of married couple and their child would be considered as legitimate if the couple is living together for a long period of time even without marriage¹¹. Also, the apex court observed that this relationship among 2 persons

⁷ *The Hindu Marriage Act, 1955* (Act 25 of 1955).

⁸ *The Code of Criminal Procedure, 1973* (Act No 2 of 1974) and *Indian Succession Act, 1925* (Act No 39 Of 1925).

⁹ *Badri Prasad v Dy Director of Consolidation*, (AIR 1978) SC 1557.

¹⁰ *Payal Katara v Superintendent, Nari Niketan and others*, (AIR 2001) ALL 254.

¹¹ *Radhika v State of MP*, (AIR 1966) MP 134.

cannot be construed as an offence.¹²

In a leading case supreme court recognised the provision for claiming maintenance¹³ that strictly it is not necessary for a woman to establish the marriage to claim maintenance, so even if she participates in lives in relationship she is entitled to get maintenance¹⁴.

A proposal was approved by the Maharashtra government in the year 2008 which suggested that if a female gets involved in live-in relationship for a long duration, she should get the status of a wife. The Malimath committee also gave suggestion that the word 'wife' in Code of Criminal Procedure be altered with words 'woman living with the man like his wife' which shows that the female partner living without marriage will also be entitled to alimony.

The supreme court held that to live with each other with a partner of one's own choice is a right to life,¹⁵ It is lawful however it could be regarded as immoral in the Indian traditional society.

In a case the supreme court while giving recognition to this relationship fixed some basic criteria to be fulfilled.¹⁶ According to the decision of the court if a couple or a man and woman spends weekend with each other or one night stand it won't make a relationship as a domestic one. The court said it clearly that if a couple has a living together for sexual purpose, then either of the partner cannot claim benefits. There are certain criteria required to be fulfilled by a couple to get to maintenance in case of dispute:¹⁷

1. Couple must show themselves as like spouses Infront of society.
2. The couple should have attained the legal age provided to get married.
3. The couple must have voluntarily cohabited for a significant duration.

V. LEGAL STATUS OF LIVE-IN RELATIONSHIPS IN OTHER COUNTRIES

United Kingdom- In U.K a woman & man living together in a sexual relationship stably are considered as Common Law Spouses and this relationship is governed a separate Act¹⁸. The parties must be above the age of 16, they should not be in civil partnership or marriage already and should not be within the prohibited degrees of relationships to come within the ambit of the said Act. The act covers the parties form the same sex till 2019 but with the 2019

¹² *Patel and others*, (2006) 8 SC 726.

¹³ *The Code of Criminal Procedure, 1973* (Act No 2 of 1974) Section 125.

¹⁴ *Abhijit Bhikaseth Auti v State of Maharashtra and others*, (AIR 2009) NOC 808 BOM.

¹⁵ *S Khushboo v Kanniammal & Anr*, (2010) 5 SCC 600.

¹⁶ *D Velusamy v D Patchaiammal* (2010) Criminal Appeal Nos 2028-2029.

¹⁷ The criteria laid down by the apex court based on the concept of 'Palimony' which was used in the USA for granting maintenance in live in relationships.

¹⁸ *Civil Partnership Act, 2004*, <<http://www.legislation.gov.uk/ukpga/2004/33/contents>> .

amendment the couples irrespective of sex can register their intent to be in live in relationship and to form a civil partnership.¹⁹

United States- California has a law which recognises cohabiting couples as domestic partners. This recognition gave birth to Domestic Partners Registry to grant legal recognition & few rights to a live-in couple as given to married partners.²⁰ However the state Mississippi and Michigan had laws against cohabitation by opposite sex partners. But in 2016 on 22nd march the legislature of Florida voted to repeal the state's law which banned cohabitation. Rick Scott the Governor of Florida signed the bill to get it converted into law on 6th- 04-2016²¹.

Scotland- Over 150000 couples of the country were identified to be in Live-in relationship.²² Some criteria was considered for determining whether a couple is in live in relation or not.²³ These criteria includes:

- The duration of their living together
- the kind of relationship in which they are living
- the extent and nature of financial arrangements

In case of failure of relationship for the purpose of getting financial support the right to apply in the court has been provided by the Act.²⁴ However a couple who lives together get separated informally without the court intervention. But if there are children then the court has powers to make order as it thinks fit for their care. For the purpose of assessing entitlement to means tested benefits & tax credits a live in partner is generally treated as a married couple. The entitlement to benefits depends upon the payment of enough national insurance contributions by the couple. For the taxation purpose each of the partner will be taxed separately and is entitles a personal allowance while calculating the amount of tax they must pay.

4. France- In France this relationship is administered by a pact.²⁵ Cohabitation there means as stable and continuous relationship of a couple of different sexes who stays together.²⁶ As

¹⁹ *Civil Partnership, Marriages and Deaths (Registration etc) Act, 2019*, <http://www.legislation.gov.uk/ukpga/2019/12/enacted>

²⁰ <https://web.archive.org/web/20080719001643/http://www.ss.ca.gov/dpregistry>

²¹ "Senate Bill 2016 – the Florida Senate" 498.

²² *The Family Law (Scotland) Act, 2006*.

²³ *The Family Law (Scotland) Act, 2006* Section 25(2).

²⁴ *The Family Law (Scotland) Act, 2006* Section 28.

²⁵ Civil Solidarity Pact passed by French National Assembly in the month of October 1999.

²⁶ Cohabitation defined by Civil Solidarity Pact- "de facto stable & continuous relationship between two persons of different sexes living together as a couple".

per the recognised pact relationship is regarded as a contract which binds the partners living together in order to systematise their common life.²⁷ And for the purpose of creating a valid contract another pact like marriage, sibling or lineage should not bound them. For conclusion of non- marital registered relationship, the minimum age set for the couples is eighteen.²⁸ French law allows French people to register their cohabitation and therefore these couples in some policy areas have rights like married couples. The couples who do not get themselves registered as live in partners have comparatively fewer rights.²⁹ Maintenance in France is not guaranteed but it can be given on the basis of needs and it can be given periodically or on lump sum. In comparison to India this maintenance concept has not been extended to non-married couples as in India the judiciary has provided the benefits of maintenance to the couple who are lives together even without marriage for a long duration.

Philippines- Union without marriage in family code of Philippines is used under chapter dealing with property matters of couples who are in live-in relationships. This concept in Philippines or non-marital unions is not recognized legislatively like India but despite of this similarity, Philippines has made certain provisions for the property rights under its civil code for the non- marital unions. The Philippines family code has provided for the provisions regarding property for the persons living together like a married couple without availing the advantage of marriage.³⁰ The Philippine Civil Code provides that property acquired by live in partners should be administered by the rules on equal co ownership and is also presumed that the property acquired by them during their live in period is obtained by their joint efforts. The one who take care of the family and maintain the affairs of the family is considered that he contributed jointly to the acquisition of property, though in reality the person may or may not have participated directly in the acquisition of property.

Australia- The Family Law Act of Australia provides that a de facto relationship can exist between couples of same or different sex.³¹

Canada- ‘Common law marriage’ recognises living together in Canada. A couple who are in conjugal relationship for a minimum duration of 12 months without a break gets legal

²⁷ *Civil Code (France), 1999* (Act no 99-944), Article 515-1 [A civil covenant of solidarity is a contract entered into by two natural persons of age, of different sexes or of a same sex, to organize their common life].

²⁸ *Civil Code (France), 1999* (Act no 99-944), Article 144 [A male and a female may not contract marriage before they have completed their eighteenth year].

²⁹ ESRC Centre for Population Change, “The increase in cohabitation and the role of marital status in family policies: A comparison of 12 European countries” (Briefing 24) (January 2015).

³⁰ *Family Code of Philippines, 1987*, Articles 147 and 148 [Chapter 7-Property Regime of Unions Without Marriage].

³¹ http://www.familycourt.wa.gov.au/_files/default.pdf

sanctity from the common law relationship.³² In most cases a common partners have the rights as of the married partners provided under the central law of the country.

VI. RIGHTS GIVEN TO CHILDREN IN INDIA BORN OUT OF LIVE-IN RELATIONSHIP

The children born in this kind of relation are legitimate by the courts and have right to inherited property as well property self-bought by them. As in any personal laws of our country there is no provision for the maintenance of children born out of such relationships, hence such children cannot claim remedies in their respective personal laws. However, they are given protection under by one of an Act of our country³³. The living couples are not allowed by the law to adopt a child as per the terms laid down by Central Adoption Resource Authority.

In a case it was pronounced that an illegitimate child born out of illicit relationship was entitled to get maintenance when they are minor and after attaining majority where the person is not able to maintain himself/herself and as such children born to live-in partners are legitimate and have the similar rights as in case of children from the valid marriage.³⁴ Similarly it was held that if a couple with or without marriage lives under one roof for some years under the evidence law³⁵ it will be presumed that they live as a married couple and their children are not considered as illegitimate.³⁶

Live-in relationships in most of the cases have become legally valid although it is still not legally binding on the couples. No specific personal laws are there to govern these kinds of relationships. However, to widen the legal prospect of this relation the Supreme Court is trying to bring a change to cope up with this foreign concept.

According to a landmark judgement the court granted the right of inheritance to the child born out of live-in relationship and granted him legal status. The court said that such children will not be denied the inheritance of property if born after a reasonable period.³⁷

In case maintenance is denied for children born in a live-in relationship, it could be challenged under court for violation of fundamental right.³⁸ Now it is said and proven by the courts that the children should be treated equally as there has always been unequal treatment

³² <https://www.canada.ca/en/immigration-refugees-citizenship/corporate/publications-manuals/operationa-1-bulletins-manuals/permanent-residence/non-economic-classes/family-class-determining-spouse/assessing-co>.

³³ *The code of Criminal Procedure, 1973* (Act No 2 of 1974) Section 125.

³⁴ *Dimple Gupta v Rajiv Gupta*, (2002) CriLJ 493, II, DMC 1.

³⁵ *Indian Evidence Act, 1872* (Act No 1 of 1872) Section 114.

³⁶ *SPS Balasubramanyam v Sruttayan*, (1994) SCC India (1) 460.

³⁷ *Vidyadhari v Sukhrana Bai*, (2008) 2 SCC 238.

³⁸ *The Constitution of India, (1950)* Article 21 (Denial of rights leads to depriving the rights of an individual to live with dignity).

with the children born out of live-in relations as compared to children born out of marital relations. The unequal treatment would be violation of fundamental right.³⁹ It can be said that even after so many judicial pronouncements the rights of children remains a topic of debate.

VII. IMPACT OF LIVE IN RELATIONSHIP ON INDIAN SOCIETY: PROS AND CONS

According to the Indian culture, it is a fact that majority of the Indians have traditional way of living. Over the years one thing has remained common for Indians and that is their traditional value. Marriages in India are considered as traditional thing and any deviation from this will be regarded as a sin here. The live in relationship concept is totally opposite of marriage. Indian society believes that couples are living together without marriage only to fulfil their sexual desire but the reality is different as the couple opt for live-in relationship to test the compatibility before they tie knot of marriage as it is a lifelong relationship and therefore everyone has right to choose the perfect partner for oneself. This kind of mindset needs social conditioning and people have to understand that there is nothing wrong to be in a live-in relationship.⁴⁰ However, supporting an eccentric concept like live-in relationship would definitely create multiple disturbances like it could harm the institution like marriage and family. The traditional society of India disapproved some living in arrangements for numerous reasons. Such kinds of practices may lead to situations which is dangerous for women. Specially, Young girls can be distorted by dishonest men where girls end up being the victim of lust which ultimately destroying their lives on false beliefs. Even though there are legislations like Domestic violence Act, 2005, but there are certain conditions to be fulfilled to bring such relationships within the ambit of marriage. If such conditions are not fulfilled, then the women are not entitled to maintenance under this act. The conditions are not clearly defined which makes much difficulty for a woman and somehow it is favouring the man. Also this is a fact that there are several advantages available to the married couples, for example marriage certificate is issued by competent legal authority which is a legal document which deals with all the legal issues related to marriage and such advantage is not possessed by live in partners as don't get any legal document to seek any help in any kind of issues between them. But there are several judgments which favoured the live in relationships in India. These developments are pragmatic in approach. It provides individuals sufficient time to focus on career and personal growth before getting married. Rational thinking and open-minded approach towards the matter like these is definitely a positive sign. Although

³⁹ *The Constitution of India, (1950)* Article 14 (Right to equality).

⁴⁰ <http://fastforwardjustice.com/live-in-relationship-and-its-impact-on-indian-society/>

big metro cities have accepted this kind of relationships, a social criticism is attached to such relationship in small cities which force the couples to remain secretive.

VIII. INDIAN JUDICIARY ON LIVE IN RELATIONSHIP

There would be presumption of marriage where a couple live together for a long duration of time as husband and wife⁴¹. According to the Privy Council, the law assume whether a couple live together in a valid marriage unless the contrary appears, and that the woman is not in a state of concubinage, if they prove to the court that they have lived together as a married couple⁴² “Similarly in a case Privy Council held that if a couple cohabitated continuously for some years, the law presumes them as a married couple who are not in a state of concubinage.”⁴³

Before the year 2000 any courts of India ever uttered the word related with Live in Relationship, but thereafter. In 2001 Justice M. Katju & Justice R.B. Mishra Allahabad High Court observed that a man and a woman even without marriage can live together if they wish to. This may be immoral for the society, but not unlawful in the eyes of law. There is a difference between Law & Morality”.

Number of judgements releasing different guidelines on the legality or validity of live in relationship were dealt by the High Court & Supreme Court after the year 2010.

A Special Bench of the Supreme Court of India consisting of K.G. Balakrishnan, Deepak Verma, B.S. Chauhan in a famous case⁴⁴ on 28 April 2010, raised a question "If an unmarried couple, wants to live together, who can oppose them? What crime they commit in such cases? It is because of the cultural exchange between people.” The Supreme Court held live-in-Relationship to be permissible. The court also held that living together is a part of the right to life⁴⁵ and is not a criminal offence.

There are certain guidelines which has been framed by the supreme court to bring the live in relationship within the expression of “relationship in the nature of marriage” to protect women under Domestic Violence Act. The guidelines incudes duration of relationship,

⁴¹ *The Indian Evidence Act, 1872* (Act No 1 of 1872), S.114- Court may presume existence of certain facts. The Court may presume the existence of any fact which it thinks likely to have happened, regard being had to the common course of natural events, human conduct and public and private business, in their relation to the facts of the particular case.

⁴² *A Dinohamy v WL Blahamy* (AIR 1927) PC 185.

⁴³ *Mohabhat Ali v Md Ibrahim Khan* (AIR 1929) PC 135.

⁴⁴ *Khushboo v Kanniammal & Anr* (2008), Criminal Appeal No 913/2010, arising out of SLP (Crl) Number 4010 of 2008, MANU/SC/0310/2010, Supreme Court, April 28th, 2010.

⁴⁵ *The Constitution of India, 1950*, Article 21 (Protection of life and personal liberty: No person shall be deprived of his life or personal liberty except according to procedure established by law).

pooling of resources, shared household etc.⁴⁶ A bench of Justices Pinaki Chandra Ghose and K.S. Radhakrishnan said that the guidelines are not exhaustive, but these will give some insight to such relationships. While framing the Guidelines the bench said the pooling of financial and other domestic arrangement, taking responsibility of each other, sexual relationship, bearing children, socializing in public and intention and conduct of the parties are some criteria that needs to be considered to determine the nature of relationship between the parties. The guidelines were presence of sexual relationship, presence of children, and marriage like relationship means refers to sexual relationship not only for pleasure but for emotional and intimate relationship and for procreation of children of children, to give emotional support, companionship, affection, caring etc. Having children is a strong indication of a long-term relationship. Sharing the responsibility for bringing up the children and supporting them is also a strong indication of a relationship in the nature of marriage. The verdict was passed by the apex court where the woman in a live-in relationship had sought maintenance from the man after the relationship came to an end.⁴⁷

IX. CONCLUSION

It can be concluded from the above study; it is much healthier to be in live-in relationship rather than to be in a bad marriage and as a result of it get divorced. The concept is emerging in all the parts of the world including India. But our culture needs a legislation for the regulation of such growing number of relationships with the changes in the thinking of the people. Supreme court tried to protect the rights of live-in partner & their children through its various decisions but still it can be seen that regulation of non- marital or live in couples are not dealt adequately in Indian laws. According to the study of Philippines and Scotland the law does not provide for registration of non-marital relationship as compared to France and United Kingdom, but these countries provide for the regulation of property matters of live in partners. The United States of America legally recognises the live- in-relationship. The legislation in India are so much devoid of recognizing the relationship of live in couples however the Indian judiciary is trying to adapt this relationship according to the existing Indian laws. As the law develops or reforms with the evolution of society, so in India to regularize live-in-relationship statutorily the mentality of Indian society is required to be adapted as per the fast growing society so that it can become a regular part of our social norms in India. Accepting a practice like live in relationship in a society where pre-marital

⁴⁶ *Indra Sharma v VKV Sharma JJ* (2013) Criminal Appeal No 2009 of 2013; decided on 26-11-2013 (SC), (14) SCC 448.

⁴⁷ <http://indiatoday.intdoay.in/story/what-is-live-in-relationship-scto-frame-guidelines/1/327292.thml>.

sex is regarded as shame is a big step forward. Therefore, a comparative study of socio legal aspects of the other countries who have recognized 'regularized live in relationship' is necessary in the present.

The study showed that although a live in relationship has through some cases finds its validity in Indian judiciary but it is still not binding on couples as there is no exclusive legislation in India to legalise it. It could be an advantage or disadvantage for the couples depending on their expectations. The law does not prescribe about the way of living of a person, its ethics & social norms. Rather law differentiates between law and morality, what is not crime may be immoral and immoral things cannot be punished. Thus, if two adults are engaged in consented sex then it is not a crime in the eyes of law however the same is regarded as immoral in Indian social norms.

X. SUGGESTIONS AND RECOMMENDATIONS

There is a need to formulate a separate and exclusive legislation for live in relationship which could clarify the concept for the same and which can provide for the rights & obligations of live in couple. This would reduce the cases of exploitation of the present law and which also reduces the cases of cruelties faced by woman in such kind of relationship. The provisions of the law regarding the time duration required to give validity to such relationships. As such all the live in couples should not be given legitimate status until they fulfil or satisfy certain requirements provided by the legislation in relation to this concept. Provisions for registration of relation, rights of the parties & rights of children should also be made. The live in relationship provides individuals freedom but because of its insecurities a special law is needed to deal with its disadvantages. Also, an express provision should be made in the Constitution of India dealing with live in relationship through which individuals should be provided this right as a fundamental right. *This fundamental right i.e. right to personal liberty has a wide interpretation by which the court has observed that it is the right of an individual to live free from any kind of constraints whether they are directly or indirectly imposed upon them.*⁴⁸ *But nowhere it is mentioned that an individual is free to live with anyone of their own choice. To be in a live-in-relationship is totally a matter of choice of an individual as they are free to live with anyone they want, provided that the person has attained the age of majority. Therefore, this right should come within the ambit of 'Right to Personal Liberty' and an express provision should be made for the same.*

⁴⁸ *The Constitution of India, 1950, Article 21 - "No person shall be deprived of his life or personal liberty except according to a procedure established by law".*

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- ESRC Centre for Population Change, The increase in cohabitation and the role of marital status in family policies: A comparison of 12 European countries (Briefing 24), January 2015
