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Uniform Civil Code: A Social Need or Political Agenda

An Analysis of the Social, Political and Legal Implications of the UCC

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ABSTRACT

The ongoing debate that began with the form to equality has taken sharp turns in developments and become a political standpoint. The constitution of India, principally mandates or guides us to unify all personal laws and ensure the governance of personal laws through a common ground, for all its citizens irrespective of the community they wish to be in or belong to. It has been over seventy years that we the people of India gave ourselves the Indian constitution, that deemed a sovereign democratic and republic state that embarked on its citizens liberty, equality, justice and fraternity. But have we moved to a true sense of secularism and are we ready to accept Uniform Civil Code through the political turmoil's lies the real question.

Keywords: *Uniform Civil Code, Personal Laws, Religion and Governance, and Secularism.*

I. INTRODUCTION

“The state shall prohibit the discrimination against a citizen on grounds of religion, race, caste, sex, place of birth”

(A) Article 15(1) of the Indian Constitution.²

The main purpose of the Indian Constitution was to architect the vision of equality before law irrespective of religion, caste, sex, place of birth, but also emphasise on equal protection for law, thereby manifesting an egalitarian society.³ The Indian Constitution since its inception had aspired to maintain the idea for a secular state.

The giving the idea of Social Justice a status quo American Philosopher Mr. John Rawls mentioned it as “social justice is the first virtue of social institution”. In comprehension of the Indian context social prejudice has taken centre stage due to practices in India, where a few

¹ Author is a student at Symbiosis Law School, Hyderabad, India.

² India Const. art. 15, amended by The Constitution (Eightieth Amendment) Act, 2000.

³ Soumalya Ghosh, *Uniform Civil Code: An Ideal Vision of Modern India*, 9 INDIAN J.L. & JUST. 207 (2018).

people or class of people were considered superior to others.⁴ As a result, the socially disadvantaged and weak sections of society needed to be enhanced by state measures and affirmative action coupled with constitutional safeguards to help them thrive. It was time to evaluate social justice with equality in order to effectively establish an equitable social order, and this was the first time that the concern of the Uniform Civil Code was raised.⁵ With the motive to maintain equality, secularism, our founding fathers drafted the Indian Constitution that secured our rights to fundamental issues and gave a larger right in enforcing them through the judiciary. The other rights that couldn't be achieved without disruption have been imposed in the Directive Principles of State policy. These principles were to be implemented within a due course of time but, unfortunately this timeframe was not adhered to in this demanding the supreme court to consider it as a right and demand compliance.

Within the light to debate upon a modernised and equal nation, the notion to have a policy has become more of a political agenda than a legal and equalitarian agenda. Article 44 of the Indian Constitution being one of the same political and religious issue has long been drawn and lost a cause of its implementation. The Article 44 of the Indian Constitution states that:

“A Uniform Civil Code. The State shall endeavour to provide for its citizens a uniform civil code (UCC) throughout the territory of India.”

(B) Article 44 of the Indian Constitution.⁶

The objective of this endeavour by Dr B.R.Ambedkar was to address the discrimination against all vulnerable groups and equalize diverse practises. Yet, the cause seems to be lost between an array of political mishaps for votes and position. As previously stated, a uniform civil code was explicitly placed to bring about unification in personal customs and practises of marriage, divorced, adoption and succession with a common code. The code to end all discrimination in religions, was argued to steal the nations regional, religious and cultural diversity and violate fundamental right to practise religious enshrined in Article 25 of the Indian Constitution.⁷

There were yet others who believed that the UCC would deny the freedom of religion. It was this uncertainty that led it to be included in the Directive Principles of State Policy rather than the chapter on Fundamental Rights in the Constitution.⁸The UCC or Article 44 of the Indian

⁴Sonam Chandwani, *Uniform Civil Code and gender justice: a critique* (2020), <https://www.lexology.com/library/detail.aspx?g=7651af73-eba0-425b-ad7b-881bfdb1d598>.

⁵ Leila Seth, *A Uniform Civil Code: towards gender justice*, 31 INDIA INTERNATIONAL CENTRE. 40-54 (2005).

⁶ India Const. art. 44, *amended by* The Constitution (Eightieth Amendment) Act, 2000.

⁷ India Const. art. 25, *amended by* The Constitution (Eightieth Amendment) Act, 2000.

⁸ *Supra* at. 6.

Constitution⁹ has been enacted for more than half a century, has still been an agenda of political debate, not giving successive governments to take into account necessary gumption and courage to act upon it. The paper further discusses the deep existing and widening schism between majorities and minorities. In favour of UCC, a need to improve the socio-economic condition of women in religious light, eradicating gender-based inequalities to establish the aimed hope of our constitution makers.

II. DECIPHERING THE REAL MEANING OF UNIFORM CIVIL CODE

(A) Prelude

The discussion aims to analyse in this section the true essence with which UCC has its effects within a community, in compliance with the projections of an equal country. But the question will always remain, whether in a country with such highlighting difference would a uniform code oppress or rise above.

(B) Implications of Uniform Civil Code

A Uniform Civil Code in reality implies the replacement of all personal laws to an inclusive and applicable law that would set a common ground for all governing citizens irrespective of their caste, colour, sex, creed or even religion. The entire debate on the two constitutional guarantees that provide for equality and equal treatment irrespective of certain ideals under the Article 14¹⁰ and Article 15 of the constitution¹¹ and similarly gives religious freedom to its citizens and a sense of cultural plurality under its Articles 25 to Article 28 of the Indian Constitution.¹² As Uniform Civil Code exists now in ideal in the Article 44 of the constitution, the Supreme Court reacted for a need to introduce a uniform code to civil society as a judgment to *Md. Ahmed Khan v. Shah Bano Begum*¹³ case which dealt with the maintenance of a former wife after divorce as per Islamic custom of talaq-e-biddat or triple talaq. It significantly observed that:

“There is no evidence of any official activity for framing a common civil code for the country. A common Civil Code will help the cause of national integration by removing disparate loyalties to laws which have conflicting ideologies.”

Similar, implications were seen in the judgements of landmarks cases such as the *Jordan Diengdeh v. SS Chopra* and *John Vallamattom v. Union of India*. Even during the formation

⁹ India Const. art. 44, *amended by* The Constitution (Eightieth Amendment) Act, 2000.

¹⁰ India Const. art. 14, *amended by* The Constitution (Eightieth Amendment) Act, 2000.

¹¹ *Supra* at 3.

¹² India Const. art. 25-28, *amended by* The Constitution (Eightieth Amendment) Act, 2000.

¹³ *Md. Ahmed Khan v. Shah Bano Begum*, (1985) AIR 945 (India).

of such a civil code, the aim was to unify, and bring about gender justice, as many personal laws had inflicted gross injustice upon a woman in cases of the personal suit.¹⁴ The need to understand Dr B.R. Ambedkar's aim to incorporate a uniform civil code was to establish a bring about a revolution in the laws of anarchic nature, that was aimed to dismiss all caste and other marital practices that affected the community.¹⁵

The understanding to decipher from the civil code is its effect or probable welfare within the community with strong religious sentiments and difference of political ideology. The modern time with an equal future to look forward to has brought about questions of the need as well as the oppression of a minority group within the limelight.¹⁶ The further understanding of uniform civil code and its religious effect need to be analysed within the constitutional and international standard of UN declarations that contest the need to eliminate any gender discrimination but do not attest the unification of laws.

While the Article 44 of the Indian Constitutional is effectively only a directive principle to the state policy, rights such as equality, right to religion, multiculturalism are seemingly justiciable fundamental rights. What this purely stand for is that the vision for a uniform civil code disregarding all forms of personal laws although enshrined as one of the constitutional goals by the framers of the Indian Constitution towards which the nation strives an individual can't demand for it. The individual cannot approach the court or governmental body demanding upon a UCC, it is simply the state's decision and provisions that can apply the UCC. The courts do however show the need for the parliament to bring about a Uniform Code that would aid causes of national integration.

(C) A Historical view

With the colonial rule present in India, the British administrators dating back to the 18th Century had effectively exempted some laws that were guiding the religious laws on the saying of "regulatory actions".¹⁷ The 1772 plan by Warren Hastings give the notion that Hindus and Muslims shall be divided and governed on the basis on their religious laws when it comes to terms of family disputes and use of religious institutions. With the stepping in of Indian Penal

¹⁴ Supra at. 4.

¹⁵ Tinju V. Thomas & Vinita Jones, *Uniform Civil Code - A Voluntary Transformation*, 2 GNLU J.L. DEV. & POL. 152 (2010).

¹⁶ Anil Malhotra & Ranjit Malhotra, *Hindu Law and Uniform Civil Code - The Indian Experience*, 2007 INT'L SURV. FAM. L. 101 (2007).

¹⁷ Rochana Bajpai, *Debating Difference: Group Rights and Liberal Democracy in India*, New Delhi, p. 183, 2011; Archana Parashar, *Women and Family Law Reform in India: Uniform Civil Code and Gender Equality*, New Delhi, p. 62, 1992; Werner Menski, *Hindu Law: Beyond Tradition and Modernity*, New Delhi, p. 161, 2003.

Code of 1862, it set as a progress yet civil law unification was not taken ahead.¹⁸ The creation of what was known as Anglo – Hindu law¹⁹ and Anglo – Muhammadan law²⁰ took place. It was post - independence when the debates of arising UCC became a constitutional and later political agenda.

When trying to decipher the contexts of UCC, taking back the debates to 1949 within the Constitutional Assembly. India's Independence gave a historical turnover to the new nation and it relied upon the duties of the founding fathers to bring about changes and imply them within the smooth functioning governments. The discussions for UCC was primarily revolving around the gender rights and debates. The practises and cultural inequalities were rioted to bring the UCC to get a complete sense of equality for all citizens. The preserved rights of the personal laws were retained to propitiate the stalwarts who arguably opposed granting, women and other unequally treated individuals a share to equal rights. The most tempered were the women who were not given any fair share of rights in terms of marriage, divorce, maintenance or inherited property. The many issues even after the release of divorce law, issues such as maintenance were not exactly favouring women and their rights.

The road to a UCC acted as a course to woman's liberation and empowerment, yet the way lead to a sense of rise in communal disharmony. With the rise of communally provoked political scenario within the country, since the periods of 1980s – 1990s it started being used by the Hindu right-winged politicians against all minority. It was used against any individual opposing the need for UCC. This issue arose as a means of political gain for the parties. UCC which first was seen as a means to equalise the communities through gender sensitivity, it became a political battle for the achievement of power in government. The lose of cause has seen the shift within organisations that supported UCC for equality to no longer stand for this demand after the political overtaking.

Although UCC in theory and practicality can be seen as a means to achieve a sense of equality among all Indian citizens, irrespective of any community that they belong to. Personal laws of different religions will bring a sense of confusion within the Indian society. Brining in equality will permit the safeguarding of citizens under the Article 14 and 15 of the constitution yet an ideological clash might arise to the freedom of religion. A sense of individuality that preserves

¹⁸ Werner Menski, *The Uniform Civil Code Debate in Indian Law: New Developments and Chang ing Agenda*, German Law Journal 9, p. 224, 2008.

¹⁹ J. Duncan M. Derrett, *Hindu Law, Past and Present*, Calcutta 1957.

²⁰ Granville Austin, *Religion, Personal Law, and Identity in India*, in: Gerald James Larson (ed.), *Re ligion and Personal Law in Secular India: A Call to Judgment*, Bloomington, p. 17. 14, 2001.

the minorities will supposedly seem to be diminished. Agreeing to the notion that changes and acceptances within personal laws also seem inconsistent and slower, such as multiple changes in the Hindu Law have been brought about yet very few changes have been seen in other personal laws.

III. UNDERSTANDING THE INDIAN SCENARIO

(A) Prelude

The section on Indian perspectives aims at analysing and comparing the social need and its ability to meet the legal need within the jurisdiction of diversity of culture and thought. The laws and rules set forth within India have given a sense of question on how and will a Uniform Civil Code be an aid to society.

(B) Uniform Civil Code – In India

The Indian independence brought about a constitution to which we the people of India solemnly swear to. With the huge discontent within communities of the drafting committee has hence then placed the UCC as a directive principle, rather than being placed as a fundamental right. Political positioning as some argue, it to be in co-existence with personal laws of the country, while there are others felt threatened to the fact of a replacement to their customary laws.²¹ India is a country with one of the most diversified laws and rules with a population of Hindus, Muslims, Christians and Parsis. These diversified religions that are currently governed by their own personal laws differ in their essence and the unification and governance of all personal laws upon Indian citizens was seen as a means of national integration.

Legal experts quite often display the ways through which the Supreme Court frames the need for UCC often judging in cases cite a "calling for help in the cause of national integration". While calling for such integration to bring about the formation of the civil code, the court also mentions on "what measures should be taken to sensitise society to a common code or codification of personal law" and the grantee to attain the desired goal of gender justice and religious equality. With the apex court calling for unification with the proper law being placed to ensure the meeting of the cause of unification, the law commission suggests different, stating that the UCC is "neither necessary nor desirable at this stage in the country. It said a unified nation does not necessarily need to have 'uniformity'."

The pressure that is put about on the leaders to put forth the requirements of the society is often lost as it is difficult for political parties to put forth the ideas that change personal laws that

²¹ Id.

directly affect people's religion. The apprehension of affect in political scenarios avoided the bringing forth of any discussion on UCC that would either have a positive or negative effect on the people.²²

(C) A view on Uniform Civil Code and Gender Justice

When we talk of gender justice within the ambit of UCC, it was seen that laws that govern the citizens in terms of civility, was seen to favour the men in any relation, whether it be succession, inheritance or even maintenance. This called for the view of a positive light of UCC. K.M. Munshi, the former member of assemble has strongly expressed his idea, "that if the personal law of inheritance, succession etc is considered as a part of the religion, the equality of women can never be achieved".²³

It would be wrong to compare the present personal laws, and a bigger error, to consider that Hindus have willingly accepted reforms and gender equality, while other religious groups and communities have not moved ahead on similar nuances against retrogressive laws that went against the principles of equality. The Hindu law was not modified it was mere codified. After all the debates and arguments for and against the bills and the purview of the UCC, in 1955 – 1956, Prime Minister Nehru did push through four pieces of legislation: "The Hindu Marriage Act", "The Hindu Succession Act", "The Hindu Minority and Guardianship Act", and "The Hindu Adoption and Maintenance Act". Although these acts were just codification of the multiple practises within Hinduism and other similar religions into conformity, when in reality they were upper - caste practices from North India, thus considered all other practises as un - recognisable. This is what most unification of laws do, it forgoes the practises of communities that are not practised widely. Although a lot of political claims inn practise, that the UCC will adopt the "positive characteristics" account of all personal laws is actually unsupportable. For instance, "Mehr cannot be introduced into Hindu marriages, nor can the Hindu marriage sacrament be made into a contract, although both of these are positive aspects of Muslim law vis-à-vis Hindu law", observed Nivedita Menon.

(D) A view on Uniform Civil Code and Indian Laws

The diversified view on personal laws is seen as a negative effect to the aspects of inequality for women or even the marginalised. The multiple personal laws present, within the Hindu community, Muslim community, Christian community, Parsi community or even the special

²² Herklotz, T. Dead Letters? The Uniform Civil Code through the Eyes of the Indian Women's Movement and the Indian Supreme Court. *Verfassung Und Recht in Übersee / Law and Politics in Africa, Asia and Latin America*, 49(2), 148-174, 2016.

²³ Constituent Assembly of India Debates, Vol. III p. 548, 1947.

marriage act, all provide for different regulations and requirements and have different view on treatment of marriage, divorce, maintenance, inheritance and duties etc. Thus although brought in popular light for the sense of equality, a political backstream can ruin any agenda.²⁴

Even when viewing the landmark case laws that cried to bring in UCC, it is a far reality to bring in UCC for the benefit of the community as a whole. The diversification is so vast that accounting for all such communities and creating a peaceful stance would be a difficult possibilities owing to the very constitution that guarantees right to religion and multiculturalism. In the *Sarada Mudgal v. Union of India*²⁵ case, the Supreme Court has observed the introduction of a uniform civil code in India on such diversified ground of “ethics”. In this case the Supreme Court held that *“conversion of a Hindu male to Islam only for the purpose of contracting bigamous marriages circumvents Sec. 494 of I.P.C. Such marriages have been declared as bigamous and void by the court. The Court held that till uniform civil code is achieved for all the Indian Citizens, there would be an inducement to a Hindu husband who wants to enter into second marriage while the first marriage is subsisting, to become a Muslim. Here the Court was pointing out the injustice done to the first wife, legally wedded. However this latter direction was treated as ‘obiter dicta’ by the court subsequently.”*

Even in the *Jordan Deigndeh v. SS. Chopra*²⁶, Justice D. Chinnappa Reddy spoke for the formation of UCC, and had observed the precedents of Chandrachud, C.J. in *Shah Bano Begum*’ case. It was observed that *“The present case is yet another which focuses on the immediate and compulsive need for a uniform civil code. The totally unsatisfactory state of affairs consequent on the lack of a uniform civil code is exposed by the facts of the present personal laws”*.

In *Seema v. Ashwani Kumar*²⁷, the Supreme Court has held that “All marriages, irrespective of their religious, be compulsorily registered.” This seemed what it felt like the first step towards uniform civil code, but a positive step.

Implementation of UCC although may seem very positive or negative at time may be needed to remove religious inequalities in the matters of succession, adoption, guardianship etc. that do prevail among the Hindu, Muslim, Christian and Parsi religious and legal practises.

²⁴ Anuradha Dingwaney & Rajeswari Sunder, *The Crisis of Secularism in India* (2006).

²⁵ *S. Mudgal v. Union of India*, AIR 1995 SC 1531.

²⁶ *Ms. Jordan Deigndeh v. S.S. Chopra*, AIR 1985 SC 935.

²⁷ *Seema v. Ashwani Kumar*, AIR 2006 SC 1158.

IV. A SHINING EXAMPLE FOR THE UNIFORM CIVIL CODE

(A) Prelude

This section discusses the implication and comparison of the Goa module to that of the unification of the nation. Aspects of large diversity and need to enable the rights of all communities, have to be taken into consideration before enabling laws.

(B) Viewing the Indian Example

India, based on customs, history and constitutionally is a welfare state. It is a shocking state of affair and paradoxical, that within the constitutes of political, religious and customary rivalry, lies an example of unified civil laws, The state of Goa. Being stated as a 'shiny example' within the preview of the Supreme courts take on UCC. Goa's customs follow the Portuguese Civil Code, 1876, that strikes alongside, ensuring the progressive Uniform Civil Code that could ensure gender justice, without trespassing the boundaries of guarantee of rights.²⁸

As per governmental requirements, the code only regulates govern marriage, adoption, divorce, maintenance, and inheritance. Yet a striking note to be understood is the religious dilemma and diversification. Although the code has for long freed the individuals from tiresome clutches of personal law dilemma, and their political agenda. Even to bring notice about is the International communities views and actions on unification, yet this cannot be taken as a prime example for the simple reason of regional diversity, largely present in India.²⁹

Terms like harmony, fair penalty, gender justice and equality, equality before law all seem indifferent in common sense to the ideas of UCC, but in reality the task of getting the practical aspect of “One nation one rule” was never easy largely on the grounds of religious demographics and differences.

(C) In comparison

India is a constitutionally declared as a “sovereign, socialist, secular, democratic, republic”. Simply stating that the State does not have a religion of its own. As simply put by Diva Rai, “*The UCC will not hinder man’s belief. It will not interfere in the lives of people. The doctrine of secularism as accepted in other country states like America and Europe is one that completely does non-interference in matters of religion.*”

Although it has to be complicitly understood that the countries that have a uniform personal

²⁸ Supra at. 5.

²⁹ Menon, N. A Uniform Civil Code in India: The State of the Debate in 2014. *Feminist Studies*, 40(2), 480-486, 2014.

law have been through different and non-comparing views of evolutionary process consisting of renaissance, reformation and enlightenment, than that of India.

The concept of “Positive Secularism” that lies onus on the state to ensure no influence of religion on progress of nation. The secular ideologies, that drive towards the view of a uniform civil code, the effect of such on minorities shall feel the tantamount to interference in their personal matters that largely differ from other.

V. POLITICAL AGENDA: FORGETTING THE CAUSE OF UNIFORM CIVIL CODE, ROLE OF MEDIA

(A) Prelude

The section would further in detail talk about the need to meet the political mis - spread of suggestions. Alongside the influence of media and effects of other influential medium.

(B) Political purviews

Political officers, often aim to win the peoples motive on issues, with strong contention, without realising the maximality of the situation that can be caused within the sentimental jurisdiction. Within a diverse country like India, educating and enabling people about the magnitude of such decisions is played out through political misogyny and misinformation of words.

A well-known Indian lawyer, Flavia Agnes, who advocates on female contentions often comments on such political agenda announcing "If national integration was the aim, then the approach had to be different." These are well worded in the political sphere of when politicians wanted to win vote banks of communities, by enabling a sort of religious prayer to each community of their own.³⁰ Presuming that the talk about such unification was delayed to calm the minorities of the realm of the partition, the actions to delay further has politicised it as a political party and the national aim, without taking into account current situations of communal needs.

As well noted by Ms Agnes, “*Today, the situation has changed and the society has become even more communal and Article 44 is being used as a stick to beat the minorities with*”. This shows the political and religious aim to divide and further bring in communal hate within the societies.³¹ As long as a consensus within communities to take into account all religious and ensure the progress of a civil code alongside personal laws, would only be possible if

³⁰ *Is Gender Justice Only a Legal Issue? Political Stakes in UCC Debate*, 32 ECONOMIC AND POLITICAL WEEKLY. 453-458. (1997)

³¹ *Id.*

communities understand and put forward their views rather than aiming at political gains.³²

VI. PRESENCE OF THE INFLUENCE – MEDIA

The essence and reality of law lies in certain unfolds within the courts. They do not only comprise of mere statutes. It's the formation of reality that hits outside the courts that calls any change a "Law". The debates brought within the Indian media always aim at achieving "communal harmony", but more so often than the achieving this "communal harmony", it instigates a stronger side for or against the ideals of a unified code for civil law.

Even eminent historian Romila Thapar observed the debated on such ideologies as "*Religion impinges on every human rights in the civil law — whether its birth, death, marriage, divorce, — the religions have laws on all of these, and Secularising India has to begin with a uniform civil code that ensures equal rights to all citizens without exceptions so making India secular necessarily means demarcating religion out of our social institutions. This will definitely effect the minority community and any law so to effect must protect and safeguard the minorities*".³³

Although individuals who pose views on UCC aim to stand neutral to effectively include all citizens, it is a necessity to view the rights of those that will be affected. Political and media agendas that although claim in harmony, seem to have other forces in mind. It is the people who must stand united and ensure that any secular step is in best guard for every Indian citizen.

VII. THE FUTURE AND RECOMMENDATIONS

Although unifying of personal laws seems as a step towards national integrity and means to attain gender justice what one need to realise is the important role it plays in the effects of all religions and communities of India. The varies diversity of India need to play a significant role in setting forth for unification. Political agendas aim to receive a certain community, but citizens of democracy must realise that they rise above all. Even if a moderate code that advocates and administers to equal laws is implicated, the need of time among people shall last. A true sense of equality through all views can only be achieved when its paid its due to gender, caste, creed, colour, and religion.

A preparation for a good harmonious environment to enact upon the Uniform Civil code is necessary in light for the effects of UCC, that effectively contain the best elements and nuances of different civil laws of the various religious communities. The government must proceed in respect to the unification but with the main agendas of inclusion and by explaining the contents

³² Supra at 29.

³³ Viraj Gaur, *Uniform Civil Code: What It Is & Why It Matters* (2019), <https://www.thequint.com/explainers/uniform-civil-code-explained-what-it-is-and-why-it-matters>.

that lie significantly within the constitution and Article 44. A true sense of unity is when every individual feel equal and not deprived by their community. A uniform civil code within diverse India must ensure not division on the basis of religion but unity by creating a feeling of nationality within each individual citizen.

VIII. CONCLUSION AND A CRITICAL OVERVIEW

A country that claims secular ideologies, will only be able to practise such though when kept aside all views come together for the views and respect of all religions, genders, communities and build upon a law that in true sense unites the diverse India. Age old customs that lie on the grounds of patriarchy, must aim to be gender neutralised in terms for attainment of equality. A diverse country like India, with large groups of minorities need to view the securing of rights in every aspect and not a loss of customs and religious traditions. Personal laws must be amended and unified through a holistic cooperation for the inclusion of all actors within a state and the true unification of India irrespective of divisions. In Menski's words, *“India has devised a strategy of carefully planned minor changes over a long span of time” through an “intricate interplay between judicial activism and parliamentary intervention”*.³⁴

“Article 44 is still very much alive, in the sense that although in its essence - uniformity and equality - is provided through other means” – Tanja Herklotz. Though the laws of civil ground have somewhat been harmonised and made more similar on grounds of equality, they remain in large formally different. A *“revolutionised mirror image of UCC”* is what calls for India. Bound by the varied means of culture yet a unified and inclusive civil code.³⁵

³⁴ Supra at 28.

³⁵ Diya Rai, *Comparative analysis of India and countries that follow the Uniform Civil Code* (2020), <https://blog.ipleaders.in/comparative-analysis-of-india-and-countries-that-follow-the-uniform-civil-code/>.

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6. India Const. art. 25, *amended by* The Constitution (Eightieth Amendment) Act, 2000
