

Evolution of Property Rights of Hindu Women: A Legislative Saga

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Abstract—The evolution of women's property rights has been extensive and complex, shaped by colonial influences, religious doctrines, cultural practices, and the constitutional and legislative reforms enacted post-independence. The pattern reflects both the persistence of patriarchal norms and the struggle for gender equality, ranging from the restrictive notions of Stridhan in ancient Hindu law to the transformative Hindu Succession (Amendment) Act of 2005.

This article explores the historical progression of women's property rights in India, offering a critical examination of how colonial legal frameworks, medieval customs, ancient traditions, and modern legal systems have affected these rights. Furthermore, it highlights constitutional principles and legal interpretations that advocate for equality in inheritance and property ownership.

Index Terms—Hindu Succession, Property, Ownership, Constitution, Manusmriti, Dowry Prohibition Act (1961), BNS, 2023, Stridhan

I. Introduction

Property ownership is crucial for advancing the social and economic empowerment of women within society. For centuries, Indian women faced restrictions on financial independence, as their rights to inherit or own property were constrained by the traditions of a patriarchal society and religious norms. Property rights, beyond being mere legal privileges, often reflected traditional perceptions of women's roles, which were confined to domestic responsibilities.

In earlier times, it was uncommon for women to have independent ownership, as they were viewed as reliant on men throughout various stages of life: as daughters dependent on their fathers, as wives reliant on their husbands, and ultimately as mothers dependent on their sons. In the ancient text Manusmriti,¹ Manu writes: "Her father protects her in childhood, her husband protects her in youth and her sons protect her in old age." Depicting the dependent status of woman unfit for independence in the society.

The evolution of women's property rights in India has been a gradual and often hesitant reform. Historical traditions provided minimal acknowledgment through Stridhan, while medieval laws further solidified male supremacy. Although the colonial era introduced codification, it failed to eradicate discriminatory frameworks. Following India's independence, the establishment of the Constitution initiated genuine change by enforcing gender equality and leading to subsequent legislation designed to harmonize inheritance rights with contemporary democratic principles. This article seeks to illuminate this progression in a chronological format, emphasizing the manipulation of control and the ongoing fight for gender justice.

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Manu IX.3: Manusmriti: The Laws of Manu, in Sacred Books of the East 56 (G. Buhler trans. 1886) (available at http://www.hinduwebsite.com/sacredscripts/laws_of_manu.htm) (last updated 2007). Even though laws are made to prevent child marriages, such acts still prevail in many villages of India. Once a girl is married as a child, she never returns to ask for the share of her ancestral property, nor are such demands entertained by her parental family. The main reason for this is that, once married, she introduces a new member to the coparcenary property-her husband

For an extended period, property ownership has been regarded as a fundamental means for individuals to acquire social and financial influence. Nevertheless, in India, for many years, the capacity of women to inherit or possess property was significantly restricted due to entrenched patriarchal norms and religious regulations. Women in the society were considered inferior in all aspects so were denied share in property being incapable to control finances in the family.

A woman who was just a home maker confined to four walls for domestic chores and raising children. The society even denied her opportunity to education and incapacitated her to be an independent individual in the society far from the reach of financial independence².

In a society characterized by a rigid social hierarchy, property rights transcended mere legal entitlements; they also reflected societal perceptions of women's roles within their families and communities. Traditionally, women were viewed as individuals requiring protection-first by their fathers, subsequently by their husbands, and ultimately by their sons.

Consequently, they had minimal opportunities to independently own or manage resources. The evolution of women's property rights in India has not occurred rapidly or uniformly.

The evolution has been steady and uniform, influenced by religious scriptures, cultural traditions, laws instituted during colonial governance, and the tenets specified in the Indian Constitution. In ancient eras, Hindu traditions allowed women to own specific personal belongings, referred to as Stridhan, (Patriarchal Hindu society provided women with property known as stridhan (literally, women's property or fortune)³, which were bestowed upon them as gifts during their nuptials or from close family members.

Nevertheless, this did not apply to immovable assets, such as land, thereby reinforcing the perception that women's rights were of lesser importance. The Mitakshara and Dayabhaga schools of Hindu jurisprudence did not grant daughters the same entitlements as sons concerning joint property ownership, leading to Hindu men retaining control over the majority of financial resources and assets. Scholars like Flavia Agnes and Bina Agarwal have observed that these customary laws effectively transformed women's ownership into a mere symbolic gesture rather than a meaningful reality, thereby perpetuating gender inequality within society.

In the medieval period, Islamic inheritance laws were somewhat disadvantageous for women, as they received smaller portions of inheritance compared to men, who acquired larger shares. While Muslim women enjoyed more clearly defined rights than their Hindu counterparts during that era, these laws unmistakably illustrate that women were regarded merely as dependents within society. During the period of colonial rule, the British began to codify certain personal laws; however, they largely maintained the prevailing male-dominated systems without significantly altering the status of women in society, asserting that they were merely honoring local customs. Werner Menski highlights that this non-interventionist strategy perpetuated existing inequalities. The Hindu Women's Right to Property Act of 1937, enacted by the British, represented a minor advancement, permitting widows to claim a portion of joint family property, yet daughters were not afforded the same rights. Legal scholars such as Ratna Kapur have described these colonial reforms as superficial, as these laws failed to challenge or disrupt the entrenched patriarchal structures of Hindu property laws.

Following India's independence, significant changes began to unfold, particularly as the Indian Constitution prioritized equality for its citizens and protection against discrimination. Members of the Constituent

² Critical analysis of disparity in property rights of women in India, A glimpse by J starli M.L District Munsif sultur

³ Stridhan (stri, meaning women, and Dhan, meaning fortune or property in Sanskrit) literally means property of a woman. The Manusmriti first used the term stridhan to denote portions of property that can be owned by women alone. Women are regarded as a means of bringing more property to in-laws' families by way of dowry. The language of the Dowry Prohibition Act (1961), BNS, 2023, gives enough scope to convert stridhan into dowry in camouflaged ways. The text of all Central Acts of the Indian Parliament is available at indiacode.nic.in. The Acts can be searched by their popular names or Act numbers presented in this article

Assembly engaged in extensive discussions regarding the necessity for family and inheritance laws to align with the principles of gender equality and fairness for all individuals in India.

Although Article 39 of the Directive Principles mandated that the government ensure equal rights for men and women in earning a livelihood, Articles 14, 15, and 16, which are part of the Constitution's third section, guaranteed equal treatment under the law for everyone. The Hindu Succession Act of 1956 represented a progressive advancement in harmonizing inheritance laws for Hindus, which also encompassed the Jain, Sikh, and Buddhist communities.

Nevertheless, it failed to grant daughters equal rights to family property shares, illustrating the reluctance of lawmakers to challenge the longstanding discriminatory property laws that favored Hindu men as the dominant gender in society. Experts such as Archana Parashar have noted that this oversight constituted a partial measure, attempting to reconcile innovative, progressive ideas with resistance from traditional, male-centric societal structures.

The court has made significant efforts to address these issues related to personal laws through judicial activism, viewed through the prism of constitutional rights. The Supreme Court's landmark judgments have declared numerous laws to be unjust and unconstitutional. For instance, in the 1986 Mary Roy case, it was determined that certain provisions of the Travancore Christian Succession Act were unjust and unconstitutional, ensuring that women could inherit on equal terms with men under the law.

Subsequently, in 1996, the Court issued a ruling in the case of C. Masilamani Mudaliar, which favored women's property rights, directly referencing the constitutional guarantee of equality. The Vinita Sharma case represented a significant advancement by the judiciary in 2020.

The statement essentially indicated that daughters are recognized as equal shareholders alongside men in the Hindu family property, as stipulated by the Hindu Succession (Amendment) Act of 2005. Justice Indu Malhotra referred to this development as a transformative change that ultimately aligned the law with the constitutional safeguarding of fundamental rights.

The laws have been changing over time in response to societal shifts. Initially, the Act of 1937 was introduced, followed by the Act of 1956, which consolidated inheritance rights. Ultimately, the enactment of the 2005 Act marked a significant milestone regarding the property rights of Hindu daughters within joint family property.

The Law Commission's 174th Report from 2000 strongly endorsed these modifications, asserting that women's property rights should align with constitutional guarantees. Durga Das Basu, a prominent figure in constitutional law, aptly referred to the amended laws of 2005 as the “constitutionalisation of Hindu property laws,” marking the first instance where the principle of equality was acknowledged in Hindu property law matters.

Despite numerous amendments to Hindu personal laws, significant issues persist. Social expectations and familial pressure from men continue to compel women to relinquish their inheritance to male relatives, often framed as fulfilling their duty or making a sacrifice. Many women are still deprived of their rightful entitlements due to a lack of awareness regarding their legal rights, and the ongoing challenges related to land registration and property transfer hinder women's ability to claim what is rightfully theirs. As Flavia Agnes⁴ has noted, possessing legal rights does not guarantee real-life changes. The situation is further complicated by the existence of varying personal laws across different religions, resulting in women receiving differing levels of legal protection based on their faith. Experts such as Bina Agarwal emphasize that for women to

⁴The law and Gender inequality, The politics of women's rights in India by Flavia Agnes 2001

achieve true empowerment, they require more than mere legal recognition; they need legal awareness, education, protection, and the capacity to make informed decisions regarding their property.

The graph depicting the evolution of women's property rights in India reveals significant fluctuations; it narrates a tale filled with numerous highs and lows, illustrating how certain aspects have remained constant while others have undergone substantial changes. This journey towards equal rights has involved women challenging discriminatory property laws, advocating for justice, and effecting amendments to outdated regulations, showcasing remarkable resilience in their legal battles.

During the pre-independence era, women in India were afforded limited property rights, primarily what was termed Stridhan, which was inadequate for enhancing their financial standing within society. However, the enactment of the 2005 Act has transformed the landscape of property laws for Hindu women, crediting the new legislators who, through this legislation, granted women equal rights as coparceners, akin to men, in property inheritance.

The establishment of these new property laws for women underscores the deeply rooted nature of male dominance, while simultaneously demonstrating how the fundamental rights to equality enshrined in the constitution can lead to profound societal changes. The next significant challenge lies in ensuring that the legal provisions are effectively implemented in practice, enabling women to exercise their rights rather than merely having them documented. This ongoing endeavor emphasizes the struggle for genuine equality, positioning women's property rights as a crucial domain where both legal frameworks and societal norms in India are undergoing transformation.

II. WOMEN'S PROPERTY RIGHTS IN ANCIENT INDIA

In ancient Hindu law, women possessed certain rights to own property, referred to as Stridhan. This Stridhan (primarily consisted of property received by the wife as gifts during her marriage. Such gifts were typically bestowed by her parents, family members, or her husband's family. Subsequently, Stridhan was recognized in Hindu scriptures, such as the Manusmriti, where it is mentioned; however, the rights associated with Stridhan were limited, imposing restrictions on the exercise of these rights to ensure that the husband retained control over its management. It was quite rare for women to have the autonomy to sell or transfer this property independently. The Sanskrit saying “Na stri swatantram arhati-Swatrantam Na Kachit Striyah”⁵ meant that women were unfit for any independent existence and was the rule of ancient Hindu society. A woman was considered less than fully human, an object to be preserved by her male guardians

The law of inheritance was primarily shaped by two significant branches of Hindu law: Mitakshara and Dayabhaga. The Mitakshara School is based on Sage Vigneshwara's interpretation of Yagnavalkya's text, while the Dayabhaga School derives from Sage Jimootvahana's commentary.

The rules made by these schools are still followed as the basic principles for inheritance law in India. The Mitakshara School⁶ was followed throughout India, except the eastern part, and is divided into four sub-schools on the basis of geographic region, namely the Dravida, Maharashtra, Banaras, and Mithila schools. The Mitakshara School is distinguished by three characteristics:

- the importance of blood relationship in matters of inheritance;
- the restrictions placed on coparceners' share in the joint family property⁷; 14 and
- the distinction between male and female heirs.

⁵ A.M. Bhattachajee, Hindu Law and the Constitution 120 (2d ed., E.L. House 1994).

⁶ One of the prominent commentaries of Smritis, and it is divided into four sub-schools on the basis of geographic region, namely the Dravida, Maharashtra, Banaras and Mithila schools

⁷ See Janaki Nair & Natl. L. Sch. of India U., Women and Law in Colonial India: A Social History 196 (Kali for Women in collaboration with the Natl. L. Sch. of India U. 1996) (discussing the Mitakshara generally).

The Mitakshara School did not grant women the same inheritance rights as men within a joint family, instead permitting only limited inheritances or the right to utilize property for their lifetime.

Conversely, the Dayabhaga system was somewhat more permissive; women under the Dayabhaga School could inherit only in the absence of male relatives entitled to the property. Thus, although women were permitted to possess property, their rights were constrained or limited, reflecting a patriarchal society where men held dominance over financial and material resources.

The Dayabhaga School, was mainly followed in the eastern part of the country, especially in the provinces of Bengal and Assam, and had no sub schools. It differs from the Mitakshara School on principles of inheritance and the position of women as heirs. According to the Dayabhaga School:

The right to inheritance arises from the spiritual offerings to the deceased ancestors;

- the right over Hindu joint family property devolves to the heir on the death of the father and not by birth, as was maintained by the Mitakshara School;
- for heirs of joint family property, each share is definite, and each brother can sell his particular fraction of the share;
- if there are no male descendants, a widow has the right to succeed to her deceased husband's share and enforce partition.

The Dayabhaga School differed considerably; therefore, from the Mitakshara School on the question of a woman's standing as property owner. Still, this more liberal policy had well-defined limits. For instance, women were not absolute owners of the property inherited from their male ancestors, because they could sell the property only for limited legal necessities and not for other reasons. On the death of the woman who had no sons, such property did not pass to her female heirs but to the nearest male heir of the deceased male owner and not to the heirs of the deceased. Another difference between the Mitakshara and Dayabhaga schools was the extent to which the Dayabhaga School divided women into five categories that determined priority in inheritance cases. These are wife, daughter, mother, father's mother and father's father's mother.⁸

III. MEDIEVAL PERIOD: CUSTOMARY PRACTICES AND MARGINALIZATION

The strong shadow of male dominance over the succession rights of Hindu women became even darker in the medieval period with the Muslim invasion.⁹ During this period, stridhan in the form of jewelry and other movable gifts started losing its implicit meaning of "women's property" and became a status symbol for matrimonial gifts to the newlywed couples in the form of Vara Dakshina or dowry¹⁰

During the middle Ages, society was structured such that the male figure in the family held complete authority, while women were relegated to a submissive role, expected to obey the man. Typically, women were not permitted to own property independently and were only entitled to the basic necessities required for survival.

⁸ Paras Diwan, Modern Hindu Law Codified and Uncodified 346-347 (10th ed., Allahabad L. Agency 1995)

⁹The Muslim conquest in the Indian subcontinent mainly took place from the 11th to 17 centuries, though earlier Muslim conquests made limited inroads into the region, beginning during the period of the ascendancy of the Rajput Kingdoms in North India, from the 7th century onward. V.D. Mahajan, History of Medieval India (S. Chand 2004)

¹⁰ Originally a woman received gifts from her family during her marriage as a form security also, but slowly it turned into a compulsion for the bride's family to gift the Stridhan not to the girl but to the bridegroom, which was termed as Vara (bridegroom) Dakshina (payment) or payment to the bridegroom for marrying the daughter. This forceful demand of Stridhan remained an unprotected social evil until the creation of the Dowry Prohibition Act (1961) which defined Vara Dakshina or "dowry" as any property or valuable security given or agreed to be given either directly or indirectly-(a) by one party to a marriage to the other party to the marriage; or (b) by the parents of either party to a marriage or by any other person, to either party to the marriage or to any other person, at or before any time after the marriage in connection with the marriage of the said parties but does not include] dower or mahr in the case of persons to whom the Muslim Personal Law (Shariat) applies. Dowry Prohibition Act (1961), Act No. 28 of 1961, available at <http://wcd.nic.in/dowryprohibitionact.htm>.

In many regions of India during that time, the prevailing family laws dictated that daughters and wives had no legal right to inherit family assets. A widow was granted limited property rights, allowing her to retain possession of property temporarily, but this was only until a male relative assumed control.

However, this was not a universal situation. In matriarchal societies, where lineage was traced through mothers, such as among the Nair community in Kerala and certain tribal groups in the northeast, women enjoyed some rights over family finances and possessions. Nevertheless, the overarching narrative of medieval India revolves around the exclusion of women from becoming coparceners or having equal property rights comparable to their male counterparts in the family.

IV. PRE INDEPENDENCE PERIOD: CODIFICATION AND LIMITED REFORMS

During the British colonial rule in India, the administration made an effort to codify Indian personal laws, yet these primarily reinforced patriarchal traditions without any attempts at reform. British administrators largely refrained from interfering with personal laws; only minor reforms were introduced through the application of “Anglo-Hindu” and “Anglo-Muslim” laws. Colonial courts often solidified religious practices into inflexible codes that further disadvantaged women.

Even while they introduced uniform laws governing other features of social life, such as crime and commerce in the eighteenth and nineteenth centuries, British colonial rulers recognized distinct Hindu family laws for different religious groups and other cultural groups.¹¹

The Hindu Women's Right to Property Act of 1937, enacted during the British period, represented a significant legal advancement regarding women's property rights, as it granted Hindu widows a share in the assets of their deceased husbands. This 1937 act allowed a widow to utilize the property throughout her lifetime; however, her rights were limited to an estate with restrictions on full transfer. Despite the presence of more gender-neutral inheritance provisions in the Indian Succession Act of 1925, applicable to Christians and Parsis, societal biases against women persisted.

Consequently, the pre-independence British era is best described as a time of partial recognition, marked by gradual reforms that failed to sufficiently address the systemic inequalities impacting women's property rights in society.

V. POST-INDEPENDENCE CONSTITUTIONAL MANDATE

A major milestone was reached in 1950 with the ratification of the Indian Constitution. Articles 14, 15, and 16¹² established equal legal rights and prohibited discrimination based on gender. The Directive Principles of State Policy, especially Article 39, required the State to guarantee equal rights to property ownership and means of livelihood. These provisions formed the constitutional basis for reforming discriminatory property laws.

The first significant reform was the Hindu Succession Act of 1956, which consolidated Hindu succession laws. While it granted women inheritance rights as Class I heirs, it did not afford daughters equal coparcenary rights in joint family property. This scenario highlighted a compromise between constitutional ideals and entrenched patriarchal traditions.

VI. MODERN LEGAL REFORMS: THE HINDU SUCCESSION (AMENDMENT) ACT, 2005

The Hindu Succession (Amendment) Act, 2005, represents the most crucial legislation aimed at reforming Hindu law by addressing a significant disparity. For the first time, women were granted equal

¹¹Narendra Subramaniam, Family Law and Cultural Pluralism, in Encyclopedia of India 55-58 (Stanley Wolpert ed., Charles Scribner's Sons: Thomson Gale 2006).

¹²The Constitution of India, 1950

property rights, with daughters receiving coparcenary rights equivalent to those of sons from birth within the framework of Hindu joint family property¹³. This amendment marked a substantial shift in the status of women, empowering daughters to claim their share and manage it as absolute owners.

Subsequently, many high courts and Supreme Court of India reinforced these changes through their judicial interpretations. The Supreme Court held that property acquired by a Hindu female in lieu of maintenance becomes her absolute property under section 14(1) of the Hindu succession act, overriding any restrictions on alienation¹⁴.

In the case of *Prakash & ors v. Phulavati & ors* (2016) the SC initially held that both the father and daughter had to be alive but on September 9, 2005, for the daughter to claim in ancestral property this was later superseded by *Vineeta Sharma*. The Supreme Court confirmed that a daughter is a coparcener by birth and entitled to share even if father has passed away before the act of 2005 provided the partition of the property was not completed¹⁵.

In *Mangammal vs. T.B Raju* (2018) the supreme court reinforced that the 2005 amendment granting daughters rights in coparcenary property applies to all pending suits, the supreme court reaffirmed that daughters have coparcenary rights (equal share in ancestral property) by birth, effective from 2005 amendment.

The Court affirmed the status of daughters as coparceners, recognizing their property rights regardless of whether their father was alive at the time the laws were amended. This decision represented a significant step towards aligning personal Hindu laws with the third part of the Constitution, which enshrines the principles of equality for all individuals in India.¹⁶

Despite the robust constitutional and legislative framework in place, women in India continue to encounter considerable obstacles in asserting their property rights. The prevailing patriarchal mindset within society poses a major challenge to the equal property rights of Hindu women. In numerous communities, it is often deemed culturally acceptable for daughters to relinquish their claims to ancestral property in favor of their brothers, whether voluntarily or under familial pressure.

Such “voluntary relinquishments” are frequently perceived as acts of sacrifice, responsibility, or familial unity, yet they starkly highlight the deep-seated gender disparities present in society. Even when the law grants women the legal right to inherit or own property, these rights often exist only on paper, as societal norms and the fear of social repercussions hinder the actualization of these legal entitlements.

The women in rural India exhibit a high degree of submissiveness. Another significant challenge preventing women from fully enjoying their property rights is the lack of awareness regarding their legal entitlements, primarily due to illiteracy. Many women, particularly in rural and semi-urban areas, are not informed about their rights under the Hindu Succession (Amendment) Act, 2005, or general inheritance laws. This ignorance stems from low literacy rates and the absence of organizational support systems for women within families, which hinders the promotion of awareness.

Regarding governmental initiatives, while the government has advocated for women's rights and launched various programs aimed at providing education and employment opportunities for women, there has been relatively less emphasis on educating women about their property and inheritance rights. Consequently, women continue to depend on male relatives or local intermediaries for information and legal processes, rendering them vulnerable to economic exploitation.

¹³ Subhamoy Das, Hindu Succession (Amendment) Act (2005): Equality for Women (Sept. 10, 2005), <http://hinduism.about.com/od/history/a/successionact.htm> (accessed March 22, 2022)

¹⁴ In the case of *v. Tulsamma v. Shesha Reddy* (1977).

¹⁵ *Danamma @ Suman Surpur v. Amar* (2018)

¹⁶ *Vineeta Sharma v. Rakesh Sharma* (2020)

The fear of being unable to manage finances, rooted in cultural conditioning that has historically rendered women financially dependent on their fathers, husbands, or sons, is a significant factor that limits the enforcement of women's property rights. From a young age, Daughters rely on their fathers or brothers, as they are raised with the belief that they are 'paraya Dhan' (someone else's property), which leads to a lack of ownership over parental property, as they often receive their share in the form of dowry.

After marriage, a daughter's husband is typically viewed as her financial caretaker, which may discourage her from claiming her inheritance due to fears of jeopardizing her financial claims on property from her brothers, potentially resulting in the loss of familial support, which is crucial for daily living. This illustrates a paradox: even though laws exist to safeguard equal rights, societal circumstances impede women's ability to assert themselves without jeopardizing their employment and relationships.

The challenges in administration and processes related to land registration and property transfer have compounded the difficulties in securing women's property rights. Women who attempt to register land or property in their name encounter problems such as bureaucratic delays, corruption, and gender biases in local revenue offices. In many cases, land records do not reflect women's ownership rights, either because the property is registered in a male's name or due to incomplete mutation processes. The lack of legitimate documents proving ownership restricts women's ability to manage, secure loans against property, or obtain institutional financing.

The inconsistencies in personal laws across various religious communities persist regarding women's rights. For example, Muslim personal law limits female heirs to a smaller share than their male counterparts based on Quranic directives, whereas the Hindu Succession Act of 2005 recognizes daughters as coparceners alongside sons. Similarly, despite some advancement in property laws, Christian and Parsi women continue to encounter inequalities in inheritance laws in several areas. These disparities arise from a fragmented legal framework where women's rights are shaped by rigid religious affiliations, leading to inconsistent legal protections.

Noteworthy judicial rulings in the country have made significant progress in addressing some of these discrepancies; however, the judiciary alone cannot surmount the societal and cultural barriers obstructing women's property rights. Much work remains to ensure that legal rights are not merely theoretical but are actively enforced in the daily lives of all women. The realization of women's rights will be achieved through social awareness initiatives and capacity building efforts.

VII. CONCLUSION

The struggle of Hindu women to attain complete ownership of ancestral property in the face of deep-rooted patriarchy is a protracted fight for the equality guaranteed by the fundamental rights enshrined in the constitution. Equality under Article 14 signifies equality in all dimensions-social, financial, and economic-for the advancement of women's status. From the ancient concept of Stridhan to the transformative Hindu Succession (Amendment) Act of 2005, history has seen both reforms and resistance from conservative elements in society who continue to deny daughters their rightful share in property.

The progressive reforms, guided by the Constitution, along with judicial intervention and landmark Supreme Court rulings, have been crucial in ensuring that discrimination against women is eliminated and that their property rights are safeguarded, empowering them to assert these rights and live with dignity in society.

Nevertheless, the full realization of the promise of equality can only occur when legal rights are reinforced by social change. The notion of property ownership for women serves as a genuine instrument of empowerment for Indian women, necessitating awareness, effective implementation, and cultural transformation.

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