



Laws relating to Dowry deaths in India

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Abstract

The issue of dowry has become a serious issue among the upper and middle classes both in urban and rural areas. The rules of marriage have been misjudged and altered for upholding the dowry system. These rules restrain the choice of mate selection, as the wedding only takes place within the same caste and outside one's clan.

A woman needs to be married to a male who belongs to a family with an upper status than that of her family. This practice of marriage agreement is known as hypergamy. When a woman gets married to a man whose family position is inferior than that of the girl's, it is known as hypogamy. Thus, hypergamy has restricted choice and established a desire to give away a woman through a wedlock to a superior family.

The issue of dowry is witnessed by all classes of Indian society, but it has become a long-lasting social evil predominantly amongst the educated middle classes involved in trade, salaried jobs and commerce. Voluntary associations, Women's organizations, and the media have articulated their grave concern for finding reformatory and lawful remedies to control the peril of this social evil. Occurrences of the dowry-related mayhems and crimes have regressed recently as a result of the social awakening generated by various groups and organizations.

Keywords: family, gift, husband, money, woman

Introduction

Dowry is not a 'gift', or an 'exchange'. It is considered more as an expense on the wedding of a girl, which parents are required to suffer by force. The family of a boy who is of a marriageable age, who possess the criteria and qualifications that the family of a girl are considering, mandate a dowry according to what they think is the 'value' of their son.

However, there are mentions to bride-price in the perspective of the old-fashioned arrangements of a marriage. There are undoubtedly references to jewellery and ornaments given to the bride. The Smritis also do not state dowry. Dowry is a phenomenon which occurred in the medieval phase. The Rajput prince's, jagirdars and thikanedars gave gifts and presents to their daughters at the time of their wedlock with an object to display their higher status and wealth. All this while, the practice sieved down from the wealthy Rajput's and other twice-born classes to other sections.

Dowry system was prevalent in India even before the British Rule, but not in the manner which is prevalent in modern India. In the pre-colonial period, dowry was an institution managed by women, to enable them to build their status and get remedy in an emergency. In the ancient practice of dowry, the parents of the bride used to give all their assets including real estate and other valuables to the bride in the form of gifts etc. It was just like how parents used to give a part of wealth to their sons, so did they give it to their daughters too during the daughter's marriage. The important aspect which is required to be kept in mind is that, the wealth or the valuables were given to the bride, and not to the groom.

Section 304-B of Indian Penal Code 1860 states that, Where the demise of a female is caused due to any burns or bodily

injury or happens other than under ordinary circumstances within 7 years of her wedding and it is shown that soon before her death she was inflicted to cruelty, torture or harassment by her husband or any family member of her husband for, or in connection with, any sort of demand for dowry, such death shall be termed dowry death, and such husband or family members shall be deemed to have caused her demise.

The author of the paper also highlights the provisions relating to dowry death under the Dowry Prohibition Act, 1961. The offence of dowry death was incorporated in Indian Penal Code and corresponding amendment made in the Evidence Act by way of insertion of Section 113-B vide Act No. 43 of 1986. In fact, the Dowry Prohibition Act, 1961 being Act No. 28 of 1961 was enacted on 20th May, 1961 with an object to prohibit to giving or taking the dowry. The insertion of Section 304-B of the Indian Penal Code and Section 113-B in the Evidence Act besides other circumstances was also referable to the 91st Report dated 10th August, 1983 of the Law Commission.

Social dimensions concerning dowry

English education and white-collar professions have highlighted the issue of dowry. A man who is well educated and employed becomes a suitable match for a woman. Dowry, has managed to keep pace with broader societal and economic changes in India, it is the rise in dowry in terms of material goods and cash. Whatever new products reach the market, such as motorbike, car, DVD player, television, music system, household goods, electrical appliances, ornaments, clothes, furniture, etc., have become an essential part of dowry.

Demand for more dowry after wedlock have become a basis of disputes between families of the bride and that of the groom. When the demands of dowry not being met by the bride or her family, brides are ridiculed, tortured, harassed, beaten, most of the times they commit suicide or they are burnt alive.

Dowry has turned into a representation of esteem for both the dowry-givers and the dowry-takers. It is stated as a matter of pride and respect to give more dowry than one's caste-fellows and kinsmen. The family of a boy brag that their son got a very huge sum of dowry, which includes jewellery, a car, land or a flat, a television and all other household and luxury goods.

There are various explanations and definitions of dowry. To understand the basic concept of dowry, one can refer to the simple dictionary meaning of dowry: "the goods, money, and estate that a wife brings to her husband in a wedlock". This payment or interchange of goods and money is conventionally the responsibility of a wife's natural family. All throughout ancient times, dowry has been a customary practice between families, where there is an exchange of goods or money.

Dowry does not just only include cash exchange. Dowry could also include- dresses for the mother in law, refrigerator, furniture for the house, and other goods. Dowry can contain crockery, furniture, spoons, pillows, bedcovers etc. As per dowry system, parents-in-law expect dowry in many different forms such as house, bike, car, jewellery etc.

Dowry means money or other things worthy in terms of money, demanded from the wife or her family by the relatives of the husband or his family or other relatives, where such a request is not properly referable to any lawfully recognized claim and is related only on the basis that the wife is married into the husband's family.

The term Dowry is generally explained and used for what a woman brings into the house or takes with her into the new house, where she would stay with the husband. All these properties which the wife gives, are earned by the wife's family or by the wife herself. This form of dowry may create its own issues because of price rises and inflated expectations, but this property is of such nature that, in ordinary and normal situations belongs to the girl, owned by her totally and should help her to establish up her position as a married woman in the newly married home.

Even if there is no considerable family property to be shared, there is an inclination amongst people to ask for or borrow money to meet the expenditure of wedding and dowry demands. The number of people in the marriage party, the number of meals, gifts to the people attending the wedding etc., are all a part of the matrimonial deal along with dowry. Hence, dowry is not only the giving of cash and material goods.

Another interpretation is that dowry is a token of affection, a gift, given to one's daughter or sister at the time of her wedding. Dowry, as a token of love, keeps her close to the parent's family even after marriage. It has become accustomed to give or take dowry. A wedlock deprived of dowry is almost unimaginable. In the south, dowry is termed as stridhan.

In north India, it is measured as a present or dahej. Whatever idea or name is given to dowry, it is definite that dowry is not the right of a girl who leaves her parent's home after getting

wedded. But it is stated as a fact that since a woman joins her husband's household in Hindu male-controlled society, she is given due return in the arrangement of dowry. Dowry is a present, a daan. Even a woman is given as a daan, which is known as kanyadaan.

There is a component of exchange because parents of the groom are expected to give presents and gifts, including clothes, jewellery and ornaments to the bride.

Indian legislative system

In the Statement of Objects and Reasons to Act No. 28 of 1961 it was expressed: ^[1]

"The object of this Bill is to restrict this evil exercise of taking and giving of dowry. This inquiry has been drawing in the Government's consideration for quite a while past, and one of the strategies by which this issue, which is basically a social one, was looked to be handled was by the conferment of enhanced property rights on the women by the Hindu Succession Act of 1956. It is, in any case, felt that a law which makes the practice culpable and, in the meantime, guarantees that any share, if given guarantee for the wife's advantage will go far to teaching popular feeling and to the evacuation of this fiendishness. There has additionally been a diligent interest for such a law both inside and outside the Parliament."

Understanding the regularly expanding and exasperating extents of the abhorrence of dowry framework, the Act was again corrected by Act No. 63 of 1984 observing the Committee's perceptions on Status of Women in India and with a perspective to making of careful and necessary examinations concerning instances of dowry deaths and stepping up anti-dowry publicity, the Government alluded the entire matter for thought by a Committee of the two Houses of Parliament. The Committee went deeply into the whole matter in awesome profundity in its procedures and in the wake of taking note of the perceptions of Pt. Jawaharlal Nehru, prescribed to analyze the working of Act No. 28 of 1961 and in the wake of considering the remarks got on the Report from the State.

A lot of consideration has been given to the evils of dowry by our Parliament. To curb the issue of dowry, the Parliament has enacted the Dowry Prohibition Act, 1961. Many states passed amendments relating to this Act. Dowry Deaths in recent years, have anticipated such alarming quantities that the Parliament had to define and identify them altogether as a class by itself in the classification of culpable homicide. The Dowry Prohibition (Amendment) Act, 1986 has added section 304-B in the (I.P.C) Indian Penal Code ^[2]

The sole purpose of this act and the reason it was enacted was to forbid the evil practice of taking and giving dowry or any form of dowry. This act makes the exercise of giving and taking of dowry a punishable offence thus endeavoring to eliminate this evil from the society. The Dowry Prohibition act was amended two times, first in 1984 by act 63 of 1984 and later on in 1986 by act 43 of 1986- to make the provisions of the act more effective and strict. The act as a whole is particularly a very short one, comprising of only 10 sections. The act came into force on 1st July, 1961 but cannot be considered to be a perfect example of success, as dowry system persists in our society till now.

A wide variety of provisions laid down in the Dowry

Prohibition Act, 1961 have been made by the concerned authorities to eradicate the evil. The related acts also provide plenty of provisions in the sections to go to, for providing relief or guarding the aggrieved party.

According to Section 3 of the Act, it says that anybody demanding dowry would be punished for a period of two years and it may extend to 5 years and would be accountable to pay a fine of Rs 15,000/- however the court may prescribe a punishment for a lesser period of time and if no demand in connection to dowry is made no punishment shall be awarded. In case of *Sidramnarayan Batane v. State of Maharashtra* ^[3], both the parties to the marriage were not well off, they did not have large lands or assets and were not in a state to incur a lot of expense on the marriage. However, an amount of Rs. 1,10,000/- was given which was not held to be called as Dowry as it was the expense, which was spent on the marriage ceremony.

In case of *L.V. Jadhav v. Shankar Rao Abasahab Pawar* ^[4], Apex Court observed that having regard to the object of the Act the whole meaning of the term Dowry should not be introduced in section 4, held that a liberal structure has to be given to the word Dowry used in this section, also the purpose of section 4 is to discourage the idea of demand of valuable security or assets or a sum of money paid for a wedding between the parties thereto. The magistrate was right in proceeding on the basis that the allegations in the complaint prima-facie constitute an offence.

In case of *Lajpat Rai Sehgal v. State* ^[5], Section 4(2) of Cr.P.C, 1973 deals with the enquiry at trials etc. under any other law. Thus, the crimes under the Dowry Prohibition Act are to be tried, investigated and enquired under the provisions of Cr.P.C.

In case of *Babulal Sao v. Moolchand Jain* ^[6], It was held that giving of gifts before formalization of wedding, these gifts are included in the definition of Dowry and the same is annulled under this section of the act.

Under section 6 of the act it has been said that if any dowry given to any individual other than the bride, then it will be transmitted to her within the specified time period. In case it is not transferred it will be held to be a crime under the act and penal action should be taken. Also, till the time the property is held with a person, he or she will hold it as a trust, further this section explains that if the female expires before receiving the property, her heirs will be entitled to claim it.

In case of *State of Karnataka v. M.V. Manju Nathegowda and another* ^[7], the late Kamalamma got wedded with accused no.1 on 17th May 1987. On 14th November, 1987, she was killed and her corpse was found in a well. The death was unusual. The death of the woman happened within a period of 7 years of her wedding with the accused. The court observed, "When a woman enters into a marriage she has several beneficial expectations. She would want a happily married life, she would want to be a mother someday and then a respected mother-in-law. All these hopes are destroyed by the cruel and torturous hands of Dowry pertaining death."

In case of *Shyam M Sachdev v. State* ^[8], It was perceived that Dowry indicates parents giving in marriage, to wedded couple as well as to others while 'Stridhan' is the possessions given to or meant for the bride only. Section 6 of the Act makes it mandatory to return the quantity of Dowry received by any

individual other than the female to whom it belongs, within a specific time period.

Consequences

The social evils of dowry and dowry death are too many and too apparent. Because of this evil, thousands of deaths and occurrences of bride burnings are informed every year in our country. Many more cases of this type are never mentioned about. When they fail to bring in an adequate sum of dowry, in cash or kind, young brides are treated cruelly and tortured, harassed, and burned alive and insulted by the groom's family. The social evil of dowry is a great humiliation to all the women. It is a representation of male dominance and woman's inferiority. Due to this evil, the birth of a baby girl is not appreciated as she is considered to be a burden on the family and society. When a girl child is born in a family, particularly in Northern India, the faces of all the members of the family fall. The very expression of happiness disappears from their face. Even the mother who has given birth to the baby girl child looks unhappy and often becomes the subject of tantrums and sarcastic remarks of her in-laws.

It is because of the system of dowry prevailing in our society. The very moment a girl child is born, the image of dowry with the claim for a huge sum of money in cash or kind comes before their eyes. Now people have reached a step-in advance to avoid this unhappy circumstance. They go to hospitals or nursing homes for pre-natal determination of the gender of the unborn baby, resorting to unwanted practices. Whether a woman wishes or not and she has to follow the orders of her in-laws.

All these events and things are occurring simply because of the system of dowry which is a disgrace on the name of the Indian society and a curse for the women. There are many other severe concerns subsequent to the payment of dowries. First, inability to meet the demand of dowry or the new demands frequently resulting in physical and verbal abuse of the wife.

Physical abuse which includes violence, burning with bidis or cigarettes, sleep deprivation, withholding nourishments and refusal of providing medical treatment. The abuse may be inflicted on the woman by the husband or his family members, especially his mother. Verbal abuse may comprise of creating gossips about the character or conduct of the wife and most of the times the girls is not able to disclose the situation and circumstances to her parents. If the physical abuse continues and worsens, this may lead to the wife committing suicide.

Additionally, a common consequence of a dowry demand which is not met is sending the girl or female back to her parents' home. When this happens, everybody considers that it must have been the fault of the girl or female saying such things as: She could not adjust with her husband or She cannot take care of her husband properly. So, once again both the woman and her family have suffered from taunts and tantrums.

This also hampers the status of the younger sisters. Apart from the social disgrace attached to the woman being returned to live with her parents there are other issues as well. The major Indian population will concede to the fact that girls are not safe even after their marriage.

Role of ngo's

As we are aware that the cruelty and violence inflicted on women and girls is a very serious violation of human rights. Its impact ranges from immediate to long-term multiple physical, sexual and mental trauma for the women in the society, including their death. This continued demand of dowry affects women's general well-being in a very negative way and often leads to impact their relationship.

Decades of mobilizing by civil society and women's movements have put ending dowry-based violence high on national agenda. An unprecedented number of laws against dowry, domestic violence, sexual assault and other forms of violence have been rolled out, however challenge remains in implementing these laws.

Women have a right to live, freely without violence is supported by international agreements such as the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), especially through the 1993 United Nations Declaration on the Elimination of Violence against Women and General Recommendations, and UN Women working with different countries at the international level to progress the international normative framework through support provided to inter-governmental processes, such as the CSW and the General Assembly. At the nation level, United Nations Women supports Governments in implementing and sanctioning legal reforms aligned as per international standards.

Organization's like UN Women tie up with UN agencies, Governments, civil society groups and other institutions for the purpose of ending violence, significances of violence, increasing consciousness of the causes and establish capacity of partners to prevent violence. They also encourage the need for bringing about a change in the behavior and customs of men and boys and promote gender equality and women's rights.

NGOs and other related Voluntary organizations work extensively with Governments to improve dedicated national action strategies to address and prevent dowry pertaining cruelty and violence against women.

The 1970s and 1980s brought about a 'second wave' of women's rights, unleashing persuasive women's worries, they also marked the start of the modern women's movement, moving away from the initial phase of social reforms and concentrating on violence, gender, feminism and the legal reforms. A thundery backdrop – Emergency, the International Women's Year and the report of CSWI (Committee on the Status of Women in India) – led to the establishment of new independent women's organizations and groups, imparting women's involvement with a whole new energy and passion.

The cruelty and Violence against women gender became the rallying point for organizations on a level that faded away in the following decades - organizations carrying out protests against the evils of dowry and dowry deaths. As the streets exploded with protests, millions came out into public space.

The evils of Dowry and dowry deaths carried out a transformation in the character and quality of involvement, interpreting the feminist assertion of the personal as political. Cruelties, Harassment, brutalities, and deaths within the homes, shook the entire nation and induced widespread anger. It was a historic phase for the women's movement. A wide

platform, Dahej Virodhi Chetna Manch, was established, including a wide range of women's organizations, cutting across feminist and political lines. Among them, Mahila Dakshata Samiti was the first in Delhi's feminist movement to take charge of the problem of dowry

The anti-dowry movements always included people from different and diverse Ideologies, from men who felt it was their responsibility to guard and protect their wives as good patriarchy, to anti-capitalist organizations like Stri Sangharsh and 'anti-patriarchal' organizations, which complained against the issue of dowry but did not invest it with the feminist assessments of the institution of marriage.

Causes of dowry system

Poverty is the main reason behind dowry because majorly the population in India are poor. They demand dowry to improve their conditions and reduce poverty.

- A large section of the population is illiterate, most the people are not aware about result of dowry.
- Narrow outlook behind the dowry system.
- A Negative approach towards women.
- Lack of education for women in Families is one of the main causes for giving dowry.
- Lack of decision making power of the women in family because in India families are ruled by the man of the house. Indian societies are patriarchal. Because of that the state of women in a family is much lower.
- Sometimes groom wants a definite sum of money to start an occupation or wants to settle in life with that money.
- In towns and cities, people think that giving dowry in a wedding is a matter of status in society.
- In rural areas, most of the people think that Dowry is their lawful right which they have to pay for their daughter's matrimonial ceremony

Women must be empowered. Gender-based inequality should be completely abolished and the position of women in the society should be raised. Girls should get the opportunity to get education at schools. After completion of school education, they should be encouraged to have higher education. Their age of marriage should be raised. The practice of mass marriage should be encouraged for the sake of economy.

To battle the viciousness, the nation needs to work towards changing men's convictions and states of mind. Youthful youngsters must be taught in their home and more noteworthy group that men and ladies are equivalent. The general population with the force – the judges, legal counselors and instructors much change their thoughts and implement the current laws. As a general public, India must meet up and dismiss the share process.

In *Soni Devrabhai Babubhai Vs State of Gujarat and Ors.* ^[9], the Supreme Court observed: Section 304B of the India Penal Code and the cognate provisions are meant for eradication of the social evil of dowry, which has been the bane of Indian society and continues unabated in spite of emancipation of women and the women's liberalization movement.

This all-pervading malady in our society has only a few exceptions in spite of equal treatment and opportunity to boys and girls for education and career. Society continues to

perpetuate the difference between them for the purpose of marriage and it is this distinction, which makes the dowry system thrive. Even though for removal of this social evil, effective steps can be taken by the society itself and the social sanctions of the community can be more deterrent, yet legal sanctions in the form of its prohibition and punishment are some steps in that direction. The Dowry Prohibition Act, 1961 was enacted for this purpose. One of the vilest practices prevalent in the Indian society is the system of dowry which if not fulfilled by the party often leads to cruelty and harassment by the husband and his relatives to the spouse.

Remedial measures

Attacking the root of dowry and not the stem. This menace should be stopped at the point of exchanging. The police officials need to take into charge and take strict actions and arrest the parties to the wedlock and all the connected members indulging in the practices of giving or taking dowry. Sue the parties indulged in dowry exchange. Through such stringent laws in dowry eradicating policies and measures, the general public will gradually understand that the dowry hungry spouses will need to sit at home unmarried forever in light of the fact that nobody will give share on account of the strict laws. They will at last need to get married in dowry-free practices. To bring measure as to have hotline numbers to report practices of dowry exchange. The laws must be strictly brought into action and all the connected parties need to be punished for their offence.

To conclude, dowry is a social evil which must be abolished. Cruelty against women has a long history in India. The nation's compelling station framework, social traditions and sexual orientation disparity have helped in the creation a male commanded society.

In 1961, India's administration made the Dowry Prohibition Act, which was changed in 1984 and 1986, making the endowment rehearse a criminal offense. However, in spite of being unlawful for quite a long time, endowment exchanges are turning out to be more uncontrolled and rehearsed.

Women must be empowered. Women must be taught since girlhood that their life is not useless without marriage. Girls should get the opportunity to get education at schools. After completion of school education, they should be encouraged to have higher education. Their age of marriage should be raised. They should be encouraged to enter into various fields of paid jobs, as their higher economic status also discourages demands for dowry.

Suggestions

The tradition and practice of dowry amongst the Hindu's has brought about a lot of issues for the parents of the bride, to get her married. Thus, in order to eliminate this evil system of dowry the Government had passed the Dowry Prohibition Act in 1961. This act covers whole of India excluding the state of Jammu & Kashmir. This Act allows only gifts which are worth not more than Rs 2,000 which only comprise of clothing, ornaments etc.

As per this Act, if any individual receives money in the form of dowry for the wife, then it is imperative for that individual to handover that amount of dowry to his wife. In case the husband does not hand over the amount to his wife, he shall be

liable to be punished with a period of 6 months of imprisonment and fine of Rs5,000.

But somehow this enactment was unsuccessful in providing the preferred outcome in our society. Efforts and determinations have been made by every organization to encourage the masses to take action for the efficient operation of the measures to curb the evil of dowry system from our community. Thus, these non- legislative actions are needed to eliminate the system of dowry.

Modern mass media like television, radio, newspapers and the internet must make public the consequences of dowry system and how it is an evil in the society which leads to violence, torture, suicides etc. Media must initiate anti-dowry outreach and must educate the people about the evil effects of the dowry system on the society.

The young millennials can play a great role in eradicating the evil of dowry from our society. They can be marshals of change; thus, the youth must be provided proper education on the effects of this evil. They should be encouraged to take adequate steps towards its complete eradication by refusing to take dowry.

NGO's and voluntary organizations have a huge part in curbing the menace of dowry. They must come up with ways to eradicate dowry. They should plan a schedule or scheme to deal with the problem of dowry. The people who are working in these NGO's or organizations must fight for the victims and sufferers of dowry and provide them justice. These organizations should create awareness through media about them, so that people can easily approach them and should have confidence in them.

Marriages outside one's caste or religion should not be discouraged. This would help the youngsters to get a broad choice in selecting their spouse. It is the simplest way for women to move outside their caste system and thus evil circles of the systems of dowry.

NGO's and many Voluntary organization, initiation of the youth actions against the system of dowry are a few of the ways of curb this evil. Abolishing of the practice of dowry would set a bright and healthy future for everybody in the country.

Conclusion

In Indian society, there is a culture of silence that supports an oppressive pressure to keep the marriage going at all costs. This successfully keeps women in abusive and cruel households. Hence, dowry and its growing demands related to it, are not the only destroyers of women in this country. Instead, it is the unfair social pressure placed on women to stay in unwelcomed and cruel households, when their lives are not safe.

The arrangement of dowry first began as standard presents when the parents used to give away blessings to the couple out of adoration and warmth. In past days, it was standard to give a few presents to the spouse and groom and his family at the season of marriage. The bride's parents or their relations out of warmth and great goal used to give the couple something to fall back upon if there should arise an occurrence of need.

The framework began during a period when young women were by and large not all that much taught and regardless of the fact that they were instructed they were unwilling to take

up productive occupation. There was likewise less open door for them either to supplement the family salary or to wind up fiscally autonomous. There was yet another purpose behind such standard endowments. The girl then was not qualified for an offer in the joint family properties when she had a sibling. Consequently, the father out of warmth or other thought used to give some money or kind to the girl at the season of marriage. Cruelty against women has a long history in India. The nation's compelling station framework, social traditions and sexual orientation disparity have helped in the creation a male commanded society.

Keeping in mind the social certainties it is only practical to accept that the dowry system will be with us for a long time to come; people will carry on to take and give dowry irrespective of laws professing to forbid such an exercise.

But by establishment of the provisions forbidding the demand for dowry, particularly those made after the wedding, it should be possible to make sure that the property goes to the female and clearly remains with her. The growing movements and economic freedom of a women by putting her in absolute control of the property that passes during dowry will progress the bride's position in her marital home.

It is vital that the right meaning and interpretation be given to the provisions of criminal laws pertaining to cruelty and violence against female's in the perspective of precise facts and circumstances. Male dominated analysis which lack feminist perceptions and opinions can lead to growth in dowry deaths.

A very recent Bombay High Court judgment stated that it is not harassment or some type of cruelty that could invite the provisions of Section 498A and that it must be recognized that cruelty or violence was with an opinion to drive the wife to commit suicide or to achieve the unlawful demands of the husband or his parents.

In another case, the High Court held that irregular violence and cruelty cannot be interpreted as cruelty under Section 498A. In the present case the deceased woman was burnt to death when the husband was present in the house. There had been numerous demands relating dowry. When the deceased woman had given birth to a baby girl she was left behind at her parents' house and her in-laws declined to accept the newborn baby girl. Despite these facts the Bombay High Court came to the decision that is stated above.

Given the parameters of criminal law, the upcoming laws of dowry necessarily depend upon public education, community action and informing all levels of the implementation organizations.

References

1. Indian Penal Code: Prof. S.N. Mishra, 15th Edition, Central Law Publications.
2. Sushila Devi, "Dowry Death and the law: Its Judicial Articulation", MDU Law Journal, Vol 5, 1999-2000
3. (1993) 1 DMC 204 (BOM).
4. 1983 (3) SCR 762.
5. 1993) 1 DM 301 (DEL).
6. (1989) 11 DMC 42 (M.P.).
7. 2003 (2) SCC 188.
8. 1990 (2) CC cases 425 (Del).
9. (1991) 4 SCC 298