

## FEMINIST JURISPRUDENCE: EVOLUTION OF LAW THROUGH A WOMAN'S LENS

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### ABSTRACT

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*The current doctrinal research is focussed on understanding the evolution of feminist jurisprudence in India and abroad. Evolution of the law through a woman's lens in India is both a process and an attempt to achieve gender equality. The approach of the legislature as well as the judiciary has changed ever since Simone de Beauvoir, the French existentialist and philosopher, asked the question, "What is a woman?" There have been several attempts to cognize and answer this question, which lies at the heart of the feminist school. Right from the need for a Uniform Civil Code to curbing digital voyeurism and introducing the female gaze, the research continues to tackle with pertinent issues. Thus, it concludes that the Feminist school is not just a mere theory, it is a symbiosis of thoughts and legal principles, a discourse, a discussion as well as a debate of multiple ideas.*

**Keywords:** *Feminist School; UCC; Digital Voyeurism; Female Gaze; CEDAW.*

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## **FEMINIST JURISPRUDENCE: EVOLUTION OF LAW THROUGH A WOMAN'S LENS**

### ***Introduction***

There have been several laws enacted for the female populace of the world. However, there still remain so many problems unspoken and unaddressed. Feminism, as a movement, seeks to reveal these pressing issues and find solutions to problems. But, as times have progressed the nature of problems faced by women at their university, workplace, public places and in the confines of their households have catapulted tremendously, growing even more complex and difficult to tackle. Polygamy, domestic violence, human trafficking, digital and cyber-crimes, stalking, voyeurism remain as some of the diseases which need to be cured, if the human society must remain healthy and sane. India too has witnessed some gruesome incidences of violence against women and children in this age of advanced technology. Therefore, it becomes compelling to undertake the current research with the following objectives:

- i. To discern the evolution of the concept of feminist jurisprudence in India and abroad;
- ii. To critically analyse the legal provisions and select judgments relating to feminist legal reforms in India;
- iii. To explore the need of a Uniform Civil Code in India to solve the problems of polygamy and inequality in matrimony;
- iv. to find if there a nexus between films and digital voyeurism on one hand and the rise in violent acts against women on the other;
- v. To suggest urgent reforms and amendments in existing laws, which may be capable of removing gender disparity, as well as cement and vindicate the rights of women.

Thus, the research in focus takes the help of the *doctrinal method of investigation* into the genesis and development of feminist jurisprudence in India and abroad. Accordingly, primary sources coupled with secondary sources are referred to in order to vindicate and substantiate relevant aspects. The research material referred to includes but is not limited to: books, guides, law journals, research articles, newspaper reports, dictionaries, blogs, landmark judgements, documentaries, textbooks, etc, which are further supplemented with detailed mention of these sources in the references provided.

### ***Definition & Scope***

As per the Oxford English Dictionary, the term 'Feminism' can be defined as "*the belief and aim, that women should have the same rights and opportunities as men; the struggle to achieve this aim*". There is a similar meaning in the Collins English dictionary, whereby it is defined as "*a doctrine or movement that advocates equal rights for women.*" These definitions are not exhaustive. In fact, it has become increasingly difficult to define, explore and explain the terms 'feminism' and 'feminist school of jurisprudence' in concise words. The reason is, that the scope of feminist school is analogous to that of the deep ocean. Therefore, to call feminist thought a mere theory, would be highly unjust. Its scope is so vast, it cannot be compartmentalised. The feminist school of thought can be seen in each and every aspect of society and of law itself. To limit the scope, one has to comprehend all the aspects, which is both challenging and tedious.

To understand 'Feminist jurisprudence' in the true sense of the term, it has to be studied from a woman's perspective. It should be understood as a symbiosis of thoughts and legal principles, a discourse, a discussion as well as a debate of multiple ideas. Hence, one can understand that the 'feminist school' is both a movement as well as an effort to bring gender parity on the individual, domestic, social, economic, cultural, educational, artistic, literary, scientific, national, international as well as on the legal front.

Feminist school of jurisprudence can be understood to mean an ever-evolving and prospering school of legal thought and scholarship, that encompasses several theories and approaches to law through the ages. Different feminist legal scholars have different views, which contradict each other at times. However, each feminist school looks closely at the evolution and development of law as well as the practical difficulties faced in implementation of the same, ideally from a woman's lens.

### ***History and Genesis***

Through careful reading of literary and historical texts, one can deduce that most of, if not all, primitive and medieval societies have been cornerstones of patriarchy. All important roles in the family, community or the kingdom were occupied by men. The women were subjugated and their presence restricted to the household. They were subjected to various disabilities ranging from choosing their education, profession, life partner or even a heir to transfer their property. Women were seen in submissive roles even in the household, viz. as cooking in the

kitchen, taking care of the old, or giving birth to children, and not participating in decision-making processes.

Whether in the Eastern or the Western side of the world, the attitude towards women was not very favourable for their growth. If women would belong to the lower socio-economic stratum of the society, their voices would be silenced, if they would fight against injustice or attempt to voice out their opinion. Women had to use their father's surname as a suffix to their own name, but were barred by law to use their mother's surname. The status of the women from higher strata was no better either. Wives did not even have the authority to limit the number of children, but were seen as a mere means to reproduce and carry forward the husband's progeny.

There are various illustrations to vindicate what has been proposed in the earlier paragraph. For instance, the historical jurist *Sir Henry Maine* has explained in his writings about Classical Roman law, under which women had '*perpetual tutelage*'. Even after her father's death, a woman had to continue under the tutelage of a guardian appointed by her father, who would act as her protector. She was thus, not allowed to take any decisions on her own, not even dispose her property off without the guardian's consent.

Another example is that of the ancient system of '*Devadasi*' in India. The *Devadasis* who were initially, the temple dancers, who were trained in classical music and dance, down the ages, became prostitutes and nautch girls in the courts of kings, as the ancient dance lost its sanctity. These dancers would be often abused by the wealthy people to satisfy their illegitimate desires. These women had little or no education or any other means of livelihood. Their children had no family or social security.

Industrial Revolution in Europe women worsened the situation of women. A direct result of migration from villages to industrialised towns and cities in search of employment was the rise in urban slums. Women workers of these factories, industries and mills, were paid less as compared to their male counterparts. All the more, these polluted industrial towns and cities were plagued with health hazards, with no separate toilets for women workers or any stringent laws against child labour, concubinage and prostitution.

As a result of several centuries of gender disparity, hardships and discrimination, a war cry arose. An urgent need for social and legal reforms was felt, which gave birth to Feminism. The French philosopher *Charles Fourier*, is credited to have coined the word '*féminisme*' in 1837. The term has first appeared in Netherlands in 1872, in England in the Oxford English

Dictionary in 1895, followed by the USA in 1910. Feminist school of thought can be best understood in its four waves or phases as it advanced over the years.

Thus, there came the First wave of Feminism (1830 to 1920) whereby Women Suffragette Movements started in the early nineteenth and twentieth centuries. These movements in USA and the UK for securing the right to vote for women in addition to emancipate women from the 'male-centric system', whereby women did not have the right to vote, right to protest, right to be elected at posts of public importance, or even give a speech at a public place. The likes of *Elizabeth Cady Stanton*, *Lucretia Mott*, *Sophia Duleep Singh* and *Emmeline Pankhurst* are important personas during the first wave.

The Second wave of Feminism (1950s-1960s onwards), also known as the '*Women's Liberation Movement*', saw major changes, with *Simone de Beauvoir*, the French existentialist and philosopher, asked the question, "*What is a woman?*" There have been varied attempts to understand and unravel this question, which lies at the core of the feminist school. In her book published by the title, '*Le Deuxième Sexe*' or '*The Second Sex*' (1949), she gives an account of the oppression that women have been facing throughout history in all walks of life.

This led to an awakening of encoding and decoding the earlier notions of femininity, the biological, psychological, professional, spiritual and social needs of women. Thus, the process of destroying the earlier image of a '*helpless woman, dependent upon the men of her household*' began simultaneously with the restructuring and creation of the image of the '*modern woman, independent and aware of her rights.*' Thus, the slogans of '*Equal Pay for Equal Work*' commenced. The famous writer *Carol Hanisch* coined the slogan, "*The Personal is Political*", which became synonymous with the second wave. Further, the schools of Liberal, Marxist and Radical feminist thought evolved.

Around the 1990s, a Third wave of Feminism, focussing on individuality, diversity and LGBTQ rights started. The Fourth wave of Feminism is believed to begin around 2012 onwards against acid attack, gang rape, sexual harassment at workplace, misuse of information and communication technology and the resultant cyber-crimes as well as social media and the '*MeToo Movement.*'

### ***Findings & Critical Analysis***

The feminist school of jurisprudence or philosophy of law is rightly based on the four waves or phases of feminist thought witnessed in the human society, in order to bring about

individual, political, social, economic as well as cultural equality between the genders and its growing influence on the legal and judicial system of India and abroad.

### ***Uniform Civil Code & Inequality in Matrimony***

Feminist thinkers and writers have always influenced the parliamentarians and judges, who are makers and interpreters of the law respectively. In law schools, one easily becomes familiar with the names of criminologists, social reformers and law-makers, who are male. However, little is taught and learnt about female activists who brought about voluminous changes in the laws of the land, with determined efforts and long-standing legal battles.

One such woman activist is late *Justice Leila Seth*, the former Judge of Supreme Court of India and author of several books on law, who toiled hard to bridge the gap between sons and daughters, when it comes to laws relating to family, matrimony and inheritance of property. The age-old belief that daughters once married have no right in father's property- no longer holds true. As Justice Seth was a part of the Law Commission from 1997-2000, she suggested many important changes in the Hindu laws for the betterment and upliftment of women. Her efforts bore fruit when her recommendations of equal succession rights for daughters became a reality. The Hindu Succession (Amendment) Act, 2005 abolished the status of a 'limited owner' granted to Hindu women. Thus, a daughter, whether married or unmarried is now placed at an equal level with that of her brothers, when it comes to inheriting the ancestral property. She can claim and receive her equal share. Many a battle was won by women activists like J. Seth. However, the goal of Uniform Civil Code (UCC), is yet to be realised.

Looking at the evolution of laws relating to family and matrimony in India, the need for a UCC cannot be controverted. In the words of Justice Seth, "*We have the right to equality and if you teach people the right to equality, and you teach people that you don't extinguish legal or sexual autonomy of a woman after marriage, then things will change.*"

The Constitution of India, 1950 guarantees to all Indian women their fundamental rights and freedoms. The Article 14 declares, "*The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India.*" Furthermore, the Article 15 forbids discrimination on the basis of religion, race, sex, caste or even place of birth. If all women are equal in the eyes of law, there must be the same law applicable to each woman and daughter of India. However, in the absence of a UCC, there is diversity in the civil and personal laws applicable to women. This results in hurdles when women knock at the doors

of justice, where they have to face multiplicity of court proceedings and delay in enforcing the laws.

To cite an example, the problem of polygamy, whereby a man can marry multiple wives at the same time, has been only partially addressed in India. The injustice done upon the first wife and her children in a polygamous marriage, simply cannot be denied. Polygamy, in fact, poses a threat to the population-control measures as well as brings with it economic problems. On the other hand, “Monogamy comes with several benefits ranging from lower crime-rate and violence against wives and children on one hand, whereas greater parental investment, financial productivity in terms of Gross Domestic Product (GDP) and female equality on the other”, so say feminists. As feminists have opined over the years, monogamy ensures a bond of trust and fidelity with mutual rights and duties between the husband and wife, leaving less scope for injustice, cruelty, desertion, sexually transmitted diseases and divorce. Therefore, monogamy was institutionalised in many societies across the globe, including ancient India, Greece and Rome. If there is a monogamous marriage and a small size of family, the cost of living is also less. The family can have better access to healthcare, education and recreation activities, having better purchasing capacity. Therefore, stressing on the economic advantages provided by monogamy as compared to polygamy, feminists and courts have supported the concept of monogamy.

Currently, although there are separate personal laws in India for Hindus, Christians, Muslims and Parsis. The major similarity between these laws is that the matrimonial laws applicable to Hindus, Christians and Parsis uphold monogamy. However, there is no legal barrier in Muslim law for a male to remarry during the subsistence of a valid first marriage. However, the woman in any of these laws, whether Hindu, Christian, Muslim or Parsi, is not allowed to remarry during the subsistence of her valid marriage, unless she becomes a widow or a divorcee or the marriage is declared to be null and void.

Before passing of the Indian Penal Code viz. IPC, 1860, polygamy was not punishable in India.

S. 494 of IPC, 1860 states:

*“Marrying again during lifetime of husband or wife:*

*Whoever, having a husband or wife living, marries in any case in which such marriage is void by reason of its taking place during the life of such husband or wife, shall be punished with*

*imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine...*”

S. 495 of IPC, 1860 states: “*Same offence with concealment of former marriage from person with whom subsequent marriage is contracted:*

*Whoever commits the offence defined in the last preceding section having concealed from the person with whom the subsequent marriage is contracted, the fact of the former marriage, shall be punished with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine.*”

However, these legal provisions of the IPC, 1860 do not apply to those governed by Muslim law. As there are multiple matrimonial laws in India, due to which women still face cruelty and injustice when it comes to marriage, maintenance, polygamy, divorce, custody of children, etc. there is still a dark tunnel to cross before equality is achieved by women in all matters of life.

In cases like “*Lily Thomas v. Union of India*<sup>1</sup>,” the inequality in marriage was highlighted, which can be overcome if the Article 44 of the Constitution of India, viz. the UCC becomes a reality. But, till date, the UCC has not seen the light of day. An interesting example would be that of Goa. In the state of Goa, the Portuguese Civil Code, is still applicable. Goa is the sole state in the country which has a UCC, irrespective of religion, caste, gender, race, etc. Therefore, the people of Hindu, Christian, Muslim as well as Parsi faith are bound by the same law related to marriage, divorce, custody of children, alimony, succession, etc. This very Code also bans polygamy in Goa, that regardless of whether one is a woman or a man, she or he cannot marry during the subsistence of a valid marriage. If Goa can achieve this uniformity, the rest of India too can. If there are uniform laws in the country, all women will have rights in marriage, equal to that of men, thus making the marriage a happy and long-lasting one. It will also save the cost of litigation, thereby bringing in speedy justice for women.

### ***Films and Digital Voyeurism***

Some believe that films have always been made by men for men, just like laws have been made by men for men. Earlier women film makers were not even heard of. Only male producers, film writers and directors made films to entertain people and most of these films were made from the male-centric view, whereby females are depicted in passive and submissive roles, instead of active, robust, decision-making, and powerful roles. Several times, women were also

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<sup>1</sup> AIR 2000 SC 1650

depicted as victims of violence and as debauched females, for the illicit pleasure of the audiences. Studies have shown that watching films with sexually explicit content has a direct positive correlation with the increase in the rate of crime against women and children.

In the words of *Laura Mulvey*<sup>2</sup>, the British feminist film theorist, “The cinema offers a number of possible pleasures. One is scopophilia.” As per the Oxford English Dictionary, ‘*Scopophilia*’ can be defined as, “*Sexual pleasure derived chiefly from watching others when they are naked or engaged in sexual activity; voyeurism*<sup>3</sup>.” In fact, studies conducted over the years have linked watching violent crimes and adult content in films to actually performing those acts in reality by males from ages 12 to 40 years. The sexist and discriminatory attitudes shown in films were reinforced in reality. Psychiatrists as well as feminist legal scholars have abhorred the scopophilia in every form, even in the form of watching films.

The UNESCO Global Media Violence Study<sup>4</sup> (under supervision of *Prof. Dr. Jo Groebel*) is must read in this direction. This interesting study reveals the negative effects of media-violence seen on children. These results spanning the years 1996 and 1997 are indeed appalling, thus pointing towards children’s habits of watching television in several nations. Violence in television, films and reality shows leaves an overall negative impact on the behaviour of people, within and outside their households. The males who watched adult content were more likely to engage in domestic violence against their wives and children than the males who did not prefer to watch such content. Regular exposure to violent and adult content amongst children has been a major cause of juvenile delinquency and is also linked to severe drug abuse. This study was executed by the World Organization of the Scout Movement and Utrecht University.

The behaviour of school children who watch such mature content at a young age undergoes massive change. One such example is of the 1998 survey conducted in England by the Independent Television Commission. As 46% of children had a television in their bedroom, they were getting addicted to adult content. Sadly, only less than half of the parent-populace monitored and prevented their children from viewing programmes, which are not appropriate for their young minds. Scopophilia is thus, not only addictive but also violative of the human

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<sup>2</sup> Laura Mulvey, ‘*Visual Pleasure and Narrative Cinema*’, University of Wisconsin (1973).

<sup>3</sup> ‘*Scopophilia*’, Oxford English Dictionary, <https://www.lexico.com/definition/scopophilia>.

<sup>4</sup> Jo Groebel, ‘*Media Violence and Children*’, Educational Media International (35), Pgs. 216-227 (1998).

rights of women and children. Therefore, is a serious threat not just to women and children in the Western side, but also in the Eastern side of the world.

For example, in England, according to the Independent Television Commission's research survey in 1998, 46% of children have a television in their bedroom and only 43% of parents monitor and prevent their child watching unsuitable programme. According to feminist film-makers, the high dangers of watching violent and adult content in the dark ambience of the theatres, is that those who regularly watched such content witnessed an arousal and high dopamine levels. Such high Dopamine levels are associated with several mental health and neurological diseases. Such an arousal or desire in male audiences to model the behaviour that was portrayed in the film, turns out to be extremely dangerous for the human society and can be linked to rise in the rate of heinous crimes like rapes of children as young as five, and of women.

Therefore, the feminist social reformers and psycho-analysts realized the need to revamp films and television serials, to have more quality, humane and meaningful content in them, which would also lower the rate of crime. Women film-makers entered the scene, whereby they made films from the female point-of-view. This called for studying every subject from the female perspective. The fine arts like paintings, literary arts like novel, poetry and performing arts like theatre and film too underwent tremendous change, as there was a shift from male-centric art to female-centric and feminist art, thus, bringing both the genders on the same plane. The male gaze was replaced with '*the female gaze.*'

Moreover, just a few years, after India became independent, the Cinematograph Act, 1952 was passed. The Central Board of Film Certification (CBFC) was also established as a statutory body in India for the purpose of regulation of films under the provisions of the Act. It performs its duty of certification of films for their public exhibition. One of the grounds on which the Central Board can refuse to certify the film at all are '*vulgarity, obscenity, depravity, double entendres or scenes degrading women, including sexual violence.*' Almost all the films that contain brutally strong violence and abusive language, humiliating, disrespectful or degrading scenes against the female populace or any social group and have nude content will be banned by law, in order to curb crimes and protect the public conscience and sanity. The said Board is a part of the Information and Broadcasting Ministry of India.

The Section-354C of Indian Penal Code, 1860 defines '*Voyeurism*' as, "*Viewing and/or capturing the image of a girl or woman going about her private acts, where she thinks that no*

*one is watching her is a crime. This includes a woman, using a toilet, or who is undressed or in her underwear, or engaged in a sexual act.”* The punishment for the said crime ranges from 3 years to 7 years of a prison-term and a fine.

A terrifying, spine-chilling incident of the *Nirbhaya Gang Rape case* took place in Delhi in 2012. A tsunami of anger and shock spread throughout the country against the heinous crime. As a result, the criminal law was amended based on the recommendations of Justice Verma Committee. The Section-354C was added to the IPC, 1860 by way of amending the law in relation to women’s safety in order to criminalise digital voyeurism in India. Moreover, the Section 67A of the IT Act declares that if any material which is published online is sexually explicit, the person who so publishes will face prison-term for 5 years and shall also be liable to pay a monetary fine of up to ten lakh rupees.

After the precedent of “*Justice K.S. Puttaswamy (Retd) vs Union of India*”,<sup>5</sup> the incorporation of ‘*Right to privacy*’ in the Article 21, which guarantees the ‘*Right to life and personal liberty*’, any voyeuristic act committed stands entirely against it. Right to Privacy is the fundamental right that every citizen of India, including Indian women deserve to enjoy. Despite laws for reducing ‘*Voyeurism*’ and protect the dignity of women, there is no fall in the rate of cyber-crimes against women. Although the films and television content can be censored by laws in India, the current generation of women and children still face a huge threat of voyeuristic content on various social media platforms, websites, blogs, chat bots, OTT platforms, which are plagued with pornography and child abuse. In recent times, the newspapers are filled with reports of online sex scandals. These websites need to be banned immediately and new laws need to come into existence for penalising these cyber-criminals. It is very difficult to crack down the criminals in the cyberspace. The cyber laws of the country need several and urgent amendments to keep it updated with the changing times.

### ***Conclusion & Suggestions***

One can deduce that based on the four waves or phases of feminist thought witnessed in the human society, women have come a long way in their fight for freedom from stereotyping, body shaming, and being considered subordinate to their male counterparts. However, the situation is not the same in every country. There is still a hefty gap between developed and the developing countries. Therefore, the CEDAW was brought into existence. The Convention on

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<sup>5</sup> AIR 2017 SC 4161

the Elimination of All Forms of Discrimination against Women (CEDAW), 1979 is described as an International Bill of rights for women. It provides the yardstick to measure all that can constitute discrimination against women. It also gives the motto of national action to end discrimination. It rightly affirms the reproductive rights of women. It confronts traditional, cultural, patriarchal aspects that bring about inequality between the two genders.

Though there are various interventions on the national and international levels for addressing women's issues, the goal of gender equality is yet to be realized completely across the globe. Public International Law seeks to overcome the barriers on the way to achieve equality for women, and attempts to go beyond the dichotomy of the developed, the developing and the less developed countries. However, there is still room for a lot of research and reporting of feminist issues.

If one observes, India had begun to change during the British rule itself, when numerous laws were passed to abolish Sati and to educate women. The social reformers abolished the Devadasi system and encouraged women from all strata of society to get a decent employment and become financially self-sufficient. Gradually, laws were enacted to uproot child marriage, dowry, and other wrongful and inhuman customs, thus laying the foundation of modern-day India that we have today. In today's India abortion, adultery, surrogacy, LGBTQ issues are no longer taboo topics, with judicial activism and judicial dynamism. There are strict laws to protect women ranging from legislations against prostitution and sexual harassment at workplace. Therefore, '*Feminist jurisprudence*' in today's times is no longer a mere theory, but a radical weapon against the male domination and degradation of women.

However, one must understand that the Feminist school does not profess that all men harass women, nor does it state in any way, that all men have been supporting patriarchy and gender stereotyping and discrimination. Feminist school believes that women and men both are unique and equal to each other, hence this equality must not just be in theory or in law books, but also be seen in daily life in real time. It is not that only women can be feminists, men too have been and can be feminist in the approach to law and social issues. In fact, *John Stuart Mill* is considered to be one of the early male feminists, who advocated for equality amongst the genders, in his '*The Subjection of Women.*'

It was *Virginia Woolf*, who in her '*A Room of One's Own*' expressed the desire to have a space and identity of one's own in the male-dominated society, so that a woman can realize her full potential leading to productive and creative possibilities. *Mary Wollstonecraft's* '*A Vindication*

*of the Rights of Woman*’, Vandana Shiva’s *Ecofeminism*, Kamla Bhasin’s *What is Patriarchy?* as well as the works of *Alice Schwarzer* and *Maya Angelou* are worth reading.

Uniform Civil Code should become a reality in India, if women are to be brought on an equal plane with each other and with their male counterparts. Thus, ensuring equality in matrimony.

Feminist jurisprudence today, not only calls for urgent amendments in the existing cyber laws of the country but also emphasize upon the proper implementation of the laws. Parents and teachers have a duty to make children understand the serious consequences of watching violent and adult content. It is imperative that the producers of film, television programmes and OTT platforms do not make and stream content that can disturb the psyche of the society by reinforcing sexist and discriminatory attitudes towards women.

The film-makers may fear loss of profits due to reducing and censoring the violent and scopophilic content, but in the long term the benefits will outweigh the monetary losses as the society will be safer for women and children. Objectification of females in films and on social media should come to a stop immediately. This will also reduce psychological health issues and drug abuse amongst children; thus, preventing them from becoming juvenile criminals and transforming them into valuable members of society.

Women have been challenging patriarchal legislations. The language of the law too is challenged, as feminists believe that the language, logic, and structure of the law are created by men for men. The entire narrative needs to change. Feminist films, art and feminist literature must be produced for depicting the actual aspirations and wishes of women.

To conclude, women should not feel isolated, aliens or unwanted in their own homes, thus becoming victims of domestic violence. Instead, they must be valued for their contribution in the domestic, professional, and social spheres. There is an urgent need for reforms in various laws to vindicate Indian women’s rights. Not just laws, people’s mentalities and attitudes also need reform. Women across the world should unite as there is always room for more reforms and revolutions in this vast province of feminist thought.