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Navigating Legal Pluralism: The Pursuit of Gender Justice Through Uniform Civil Code in India

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Abstract - ***"The best thermometer to the progress of a nation is its treatment of its women"- Swami Vivekananda***
The debate surrounding the Uniform Civil Code (UCC) in India has consistently intersected with questions of gender justice, religious freedom, and constitutional morality. Personal laws governing marriage, divorce, inheritance, adoption, and maintenance across religious communities have historically reflected deep-rooted patriarchal norms, often placing women at a structural disadvantage. This paper examines the pursuit of gender justice through the lens of the Uniform Civil Code by tracing the historical evolution of women's rights in India—from the relative egalitarianism of the early Vedic period to the pronounced gender inequalities of the medieval era, and the gradual reformist interventions of the colonial and post-colonial periods.

The study analyses the constitutional positioning of the UCC under Article 44 as a Directive Principle of State Policy and explores the ideological debates within the Constituent Assembly that shaped its non-enforceable status. It further evaluates legislative and judicial interventions that have incrementally advanced uniformity and gender equity, including secular statutes such as Section 125 of the Code of Criminal Procedure, the Hindu Code Bills, the Special Marriage Act, the Juvenile Justice Act, and amendments addressing guardianship and adoption. Judicial pronouncements in landmark cases such as *Shah Bano*, *Daniel Latifi*, *Sarla Mudgal*, *Vineeta Sharma*, and *Shayara Bano* are critically examined to illustrate the judiciary's role in harmonising personal laws with constitutional values of equality and dignity. By also engaging with contemporary developments in Goa and Uttarakhand, the paper argues that while a comprehensive UCC remains politically and socially contested, a gradual, women-centric, and consultative approach offers a pragmatic path forward. Ultimately, the paper contends that meaningful gender justice in India is difficult to achieve without reforming or transcending fragmented personal law regimes.
Keywords: Uniform Civil Code, Gender Justice, Personal Laws, Women's Rights, Constitutional Morality.

Introduction

Uniform Civil Code- The concept Uniform Civil Code refers to a common law that applies to all religious communities in personal matters such as marriage, inheritance, divorce, adoption, etc.Historically, the idea of UCC was influenced by similar codes drafted in European countries during the 19th century and early 20th century, and in particular the French code of 1804 that had eradicated all forms of customary or statutory laws prevailing at that time and replaced it with a uniform code.The origin of the UCC in India dates back to colonial India when the British government submitted its report in 1835 stressing the need for uniformity in the codification of Indian law relating to crimes, evidence, and contracts, specifically recommending that personal laws of Hindus and Muslims be kept outside such codification.Family matters in India are rooted in religion, hence, depending on one's faith, different personal laws are then appliedwhich entails that since several religious communities are present, different personal law systems are likewise in force (Muslim personal law, Hindu personal law, Christian personal law, etc.).

Patriarchy and Its Impact on Women's Rights - The patriarchal mindset forms the foundation of most religious institutions in India, especially in Hinduism, Christianity, and Islam. It stems from the belief that God is male. Patriarchy is the fundamental reason for the exclusion of women from positions of religious authority, and it needs to be eradicated from all major religious traditions. This deep-rooted gender bias presents a significant barrier and causes deep psychological harm to those who are subjected to it.

Vedic Period - During theancientVedicperiod, there wereequal rights between menandwomen, andeven had feminist lawmakers like GargiandMaitreyi. In the ancient text of the Vedas, the concept of humans is a bedrock for society, in Taittiriya Samhita women and men were considered as the two-wheel of a cart.But thelater Vedic period there was a decline and thus began the polarization of sexes.

Medieval India - During this period, preference was given to the male members. It was believed that males are assets of the family. Women's dependence on their spouses or other male relatives was a defining characteristic of this time. Child marriage, Purdah system, Sati Pratha, Jauhar, restriction on girl's education were prevalent. Women had limited rights and autonomy, often confined to domestic roles and denied participation in public and intellectual life. Their social status and opportunities were largely determined by their relationships with men, further entrenching gender inequality. These practices not only limited women's potential but also perpetuated a cycle of subjugation and marginalization.

Modern India - The British established control over India and initiated modernization in the 19th century. At the onset of British rule, the status of women in India had significantly declined, reaching an all-time low. The life of Indian women is the life of restrictions and prohibitions. On the one hand, child marriage and polygamy were prevalent and on the other hand ban on widow remarriage, denial of property rights and right to education to women were a social norm. The formation of autonomous, egalitarian nationalist communities emphasizing the equality of women and men was sought on a global scale during the intellectual revolution of the 18th and 19th centuries. Early champions of women's rights in India, like Raja Ram Mohun Roy and Iswarchandra Vidyasagar, paved the way for a better future. Roy fiercely opposed the horrific practice of Sati and fought for the freedom of women from the restrictive purdah system. Vidyasagar's tireless efforts led to the Widow Remarriage Act of 1856, a landmark legislation. It's important to recognize that women reformers like Pandita Ramabai and Tarabai Shinde also played a crucial role. Their voices challenged the limitations placed on women, even by some male reformers of their time.

Status of Women in the Twenty-First Century - The status of women has improved considerably in the twenty first century. Specially in the past 60 years, India's modern education system has empowered a new generation of both men and women. This has fuelled significant political and social changes. Women's rise to the highest positions in the country, a testament to this progress. The Indian Constitution plays a crucial role too, securing women's rights in various ways. Despite these advancements, the journey towards full gender equality is far from over. There are still goals to be achieved, and social and political reforms concerning women's rights must continue.

Gender Justice- The Concept - Gender justice is a concept that promotes the full realization of rights and opportunities for all genders. It aims to achieve equality between men and women, as well as among various gender identities, by ensuring equal rights, responsibilities, and opportunities. This comprehensive approach tackles the underlying causes of gender discrimination, ensuring that women and gender minorities are fully included in the enjoyment of their human rights.Gender justice entails ending the inequalities between women and men that are produced and reproduced in the family, the community, the market, and the state.

Uniform Civil Code in India - The concept of uniform civil code stems from the fact that India was under British rule and they aimed to maintain control with minimal disruption. They avoided directly interfering in religious matters but their rule still had indirect consequences. British did generally avoid directly outlawing religious practices to maintain social order. However, their policies and legal system indirectly impacted religious practices.

Second Law Commission- The Second Law Commission (1834-1835) focused on codifying criminal law, evidence law, and procedural law,aiming for uniformity across British India.Personal laws were largely left untouched· These laws largely remainedunderthe domain of their respective religious communities.

The Lex Loci Report of October 1840- It stressed the importance and necessity of uniformity in the codification of Indian law, relating to crimes, evidence, and contract. But it also recommended that personal laws of Hindus and Muslims should be kept outside such codification.

The Queen's Proclamation, 1858–It announced the transference of the government of India from the East India Company to the Crown. It promised that the 'Rights, Dignity, and Honour' of the Princes[17] would be respected and also assured absolute non-interference in religious matters.

The Drafting of the Constitution of India-The Fundamental Right Sub-committee made UCC a Directive Principle of the State Policy. Mr Ayyangar, a member of the Constituent Assembly, supported the idea of maintaining personal laws, citing the principle of Indian secularism, which treats all religions equally. Both Hindu and Muslim organisations voiced concerns about the Constituent Assembly's authority to intervene in religious law, finding Article 35 to conflict with religious freedom. Members of the Hindu community held differing opinions compared to the Muslim members. KM Munshi asserted that Parliament could enact the UCC even if Article 35 didn't exist, pointing out that articles granting freedom of religion also gave the state the power to regulate secular aspects related to religion. A.K. Iyer, a member of the Constituent Assembly, supported K.M. Munshi and urged the Assembly to approve the article related to the Uniform Civil Code. The supporters of UCC vociferously called for its shifting into fundamental rights as they claimed that personal law has and will divide the state into watertight compartments and interests of communities would override national interests.[19]Critics like Mohamed Ismail Sheikh wanted the individual right to personal law to be included in the fundamental rights. They wanted this because they felt "the right to follow personal laws is part of the way of the life of those people who are

following such laws: it is part of their religion and part of their culture." The third perspective proposed that personal laws would gradually be phased out with the consent of stakeholders, leading to the establishment of a uniform civil code as the governing legislation on personal law. B.R. Ambedkar endorsed this view, advocating for the inclusion of the uniform civil code in the directive principles, but emphasized that its application to individuals should be voluntary.

In the Sarla Mudgal case, where Kuldip Singh, J. argued that if a single personal law could cover 80% of a diverse population within a short period of four or five years from the commencement of the Constitution, ***"there is no justification to keep the introduction of uniform civil code in abeyance."***

Women Rights and Uniform Civil Code

Legal PerspectivePersonal laws of all religions are often riddled with misogynistic bias, and no single personal law can serve as an ideal model for the UCC. Amendments and new legislation are necessary steps toward achieving a UCC in India's diverse society. The legislature has played a crucial role in advancing the UCC through these legislative efforts and their respective amendments.

- **Code of Criminal Procedure/ Bharatiya Nyaya Suraksha Sanhita -** The application of maintenance under section 125 CrPC illustrates progress towards a uniform civil code. It is pertinent to mention here that the Sections 125 of CrPC and Section 144 B.N.S.S are identically worded and therefore legal position is the same as it was before.Traditionally, under Mohammedan law, a divorced wife was entitled to maintenance only during the iddat period. However, in the case of Mohd. Ahmed Khan v. Shah Bano Begum, the Supreme Court ruled that the rights provided under sections 125 to 128 also apply to divorced Muslim women. Subsequently, in 1986, Parliament enacted the Muslim Women (Protection of Rights on Divorce) Act, extending the right to maintenance beyond the iddat period.
- **Hindu Marriage Act of 1955** established a comprehensive legal framework that oversees the practice of Hindu marriage. The laws of Mitakshara andDayabagha (Bengal)were previously in use in various regions of India. It has imposed monogamy on the institution of marriage. Hindus were also given access to the divorce laws.
- **Special Marriage Act of 1954** has laid down legislation for inter-faith marriages. In HinduMarriage Act is only two Hindus can marry each other. The act mentions 'any person' undersection 4 which means it could be a non-citizen also.
- **Juvenile Justice Act of 2000** is a secular piece of legislation that permits individuals to adopt, even if their personal laws do not grant this right. Christian, Parsi, and Jewish personal laws lack provisions for adoption, but the JJ act provides them with the right to adopt.
- **Dissolution of Muslim Marriages Act** was enacted The Dissolution of Muslim Marriages Act of 1939 was established to clarify and consolidate the rights of married Muslim women to seek divorce. In customary Muslim law rights of women to seek divorce were very limited. This act his act broadens these rights and lists the grounds for dissolution of marriage for Muslim women, including:
  - Desertion or neglecting maintenance for two years;
  - Cruelty;
  - The husband being sentenced to imprisonment of seven years or upwards;
  - Failure to perform marital obligations for three years without reasonable cause;
  - Husband's impotence at the time of marriage and continuing to be so;
  - Husband being insane, or suffering from leprosy or a severe disease for two years;
  - Wife being married before the age of fifteen and repudiating the marriage before reaching adulthood;
  - Husband's whereabouts being unknown for four years.
- **Personal Laws (Amendment) Act of 2010**

(i) Section 9 of The Hindu Adoption and Maintenance Act empowered the father to give a child inadoption and the mother could give in adoption only when he is not alive, or of unsound mind, orhas renounced the world. However, this requirement was eliminated by the 2010 amendment. Now,both father and mother have equal rights to give a child in adoption.

(ii) As per section 19 of the Guardians and Wards Act of 1890, a mother was not a Guardianalong with a father. However, the amendment has done away with this the gender disparity in the provision byincluding the mother as a guardian in clause (b) of section 19 of the act.

Achieving a Uniform Civil Code (UCC) in India necessitates substantial legislative efforts and amendments due to the inherent misogynistic biases in personal laws of all religions. The aforementioned legislative developments reflect the critical role of the legislature in addressing gender disparities and advancing towards a UCC, ensuring equal rights and gender justice in India's diverse legal, social, cultural and religious landscape.

Judicial Perspective

"Any attempt to have a uniform civil code must ensure that it is women centric while not being disadvantageous to other genders."

- Justice Nagarathna, Judge Supreme Court of India

The demand for UCC is generally made by aggrieved women as a substitute for existing laws as patriarchal orthodox people still deem the reform in personal laws will destroy their sanctity.The implementation of the Uniform Civil Code (UCC) primarily impacts two key aspects:

i. secularism and
ii. the establishment of equal status for women in society.

This analysis begins with the ***Mohd. Ahmed Khan v. Shah Bano Begum*** case, where the issue of maintenance

under Section 125 of the Code of Criminal Procedure was addressed after Shah Bano's husband pronounced talaq. In the present case, the issue was the extent of a Muslim husband's liability to maintain his divorced wife under Section 125 of the Cr.P.C 1973. The court examined various authorities and translations of the Quran to support the view that a Muslim woman who has been divorced by her husband has the right to be maintained even after the period of Iddat. The court upheld that the provision of maintenance under Section 125 of the Cr.P.C is secular and applies to all, regardless of religion. This judgment sparked unprecedented debate and controversy regarding a Muslim woman's right to claim maintenance from her husband after divorce, ultimately leading to the conclusion that a husband is duty-bound to maintain his wife even after the Iddat period. The Shah Bano judgment resulted in widespread protests from various sections of the Muslim community, who perceived the ruling as an attack on their religious personal laws. Protesters were unable to accept that husbands have the liability to maintain their wives even after the Iddat period. Consequently, the Muslim Women (Protection of Rights on Divorce) Act 1986 was enacted. This act, seen as a political maneuver, diluted the rights of divorced women by absolving husbands of the responsibility to maintain their wives beyond the Iddat period, instead placing this burden on the relatives who would inherit the woman's property after her death or, if she held no such property, on the Waqf Board.

In his ruling, *Chief Justice Y.V. Chandrachud emphasized that Parliament should define the framework of a common civil code to promote national harmony and equality before the law*. However, instead of addressing this issue, the government enacted the Muslim Women (Protection of Rights on Divorce) Act in 1986.

In ***Daniel Latifi vs Union of India*** the court stated that a husband's liability extends beyond the Iddat period. It held that during the Iddat period, the husband must arrange for maintenance that will cover his ex-wife even after the Iddat period ends. This decision aimed to address the shortcomings of the Muslim Women (Protection of Rights on Divorce) Act 1986, while still upholding the act's constitutionality. This case is significant because it established, for the first time, that a Muslim husband's obligation to support his divorced wife continues beyond the Iddat period. He must fulfil this obligation within the Iddat period, thereby balancing Muslim personal law with the Criminal Procedure Code, 1973.

In ***Sarla Mudgal, President, Kalyani, and others versus Union of Indiaand others***, where the Supreme Court called upon the government to implement a Uniform Civil Code, akin to the Hindu Code, to safeguard individuals from abuse and to foster national unity. This viewpoint was also reflected in the judgments of***Lily Thomas versus Union of India*** and ***ABC v. The State (NCT of Delhi)*** were dealt with. While in the former, the Supreme Court emphasised the significance of UCC in terms of succession, and in the latter, it held that a single mother of the Christian religion was eligible to apply for sole guardianship of her child without the assent of the natural father under the Guardian and Wards Act, 1890 that had not recognised the right of Christian single mothers. In this context, the court pointed out the inconvenience caused in absence of a uniform civil code.

The Indian Supreme Court in ***Shayara Bano v. UOI & Ors*** declared instant triple talaq unconstitutional. Subsequently, legislation was enacted declaring triple talaq illegal and void, making it a punishable offense with imprisonment up to three years and a fine. It is classified as a cognizable and compoundable offense. Additionally, the wife is entitled to a subsistence allowance as determined by the magistrate. However, this raises questions about how an imprisoned husband can provide such an allowance and the potential further strain on the marital relationship. Furthermore, since the divorce is void, the wife cannot remarry. While the legislation is a positive step, it contains some debatable provisions.

In ***Vineeta Sharma v. Rakesh Sharma*** it was held that daughters have been entitled to equal coparcenary rights in a Hindu undivided family. This right is absolute, applying even if the father died before the Hindu Succession (Amendment) Act of 2005 and regardless of the daughter's birth date. It is a right that daughters acquire from birth.

In ***Githa Hariharan v. RBI***, the Supreme Court of India determined that the term 'after' implies 'in the absence of' rather than 'after the lifetime of the father'. This ruling affirmed that the mother could act as a guardian on various occasions even while the father is alive. The constitutionality of Section 6 of the act was upheld in this specific case. However, there remains a perceived preference for fathers over mothers. Therefore, both parents should be regarded equally regarding the right to guardianship of their child.

In summary, the journey toward establishing a Uniform Civil Code (UCC) in India is fundamentally tied to achieving gender justice and ensuring equal rights for women across all communities. Landmark cases which have paved way in this direction are Mohd. Ahmed Khan v. Shah Bano Begum which has set the stage for recognizing maintenance laws as secular and applicable to all, irrespective of religion. Despite the enactment of the Muslim Women (Protection of Rights on Divorce) Act 1986, which curtailed some of these advancements, the judiciary has consistently called for a UCC to unify the diverse legal frameworks governing personal laws. Subsequent rulings, including Vineeta Sharma v. Rakesh Sharma and Githa Hariharan v. RBI, have further underscored the necessity of gender-neutral laws, indicating that a UCC is crucial for both protecting women's rights and promoting national unity. The persistent advocacy by the Supreme Court for legislative action highlights the need to harmonize religious diversity with the principles of gender justice and equality, marking a significant step forward in the legal landscape of India. This

analysis gives us a snippet of how judiciary is paving way to achieving gender justice in India.

Contemporary Scenario - India currently lacks a Uniform Civil Code (UCC) at the national level, resulting in diverse personal laws governing marriage, inheritance, adoption, and maintenance based on religious and community affiliations. The exception to this is Goa, which retains its Goa Civil Code from Portuguese colonial rule, representing a unique instance of a UCC within India.

Goa - On 22 December 2016, a major reform took place in which parts of the Portuguese Civil Code were replaced by the Goa Inheritance, Special Notaries and Inventory Procedures Act 2012, which mainly focuses on family property issues. Goa's marital property laws mandate equal ownership of assets acquired before or after marriage, so in case of divorce, each spouse is entitled to half. Prenuptial agreements are also allowed to be entered into. Half of the estate must be legally passed onto the heirs. This also applies to self-acquired property and is similar to the concept of "coparcenary" in Hindu law. The UCC also prohibits polygamy for Muslim men in marriages registered in Goa. This serves as an example for other states and Union Territories.

Uttarakhand - The Uniform Civil Code (UCC) in Uttarakhand is set to be implemented, potentially soon in the state, as the draft report prepared by the expert panel, headed by Justice (retd) Ranjana Prakash Desai has been duly submitted to the state government. The law aims to establish uniform rules for marriage, divorce, inheritance, and property across all communities, while exempting tribal groups and recognizing customary practices. The legislation has provisions for banning polygamy and "halala," legitimizing children from live-in relationships, and ensuring maintenance for deserted women. It is seen as a landmark step toward gender equality and social justice, with possible implications for similar laws in other states.

Despite Article 44 of the Constitution suggesting the implementation of a UCC as a Directive Principle of State Policy, these principles are not legally binding but serve as guidelines for policy-making. Recent legislative efforts include the proposal of UCC bills in 2019 and 2020, both of which were withdrawn before introduction in Parliament. Uttarakhand has taken a pioneering step by passing a UCC bill in 2024, although its implementation remains pending.[45] These developments underscore ongoing debates and challenges surrounding the establishment of a UCC in India, reflecting varying perspectives on secularism, gender equality, and the balance between uniformity and diversity in personal laws across the nation.

Conclusion - In conclusion, the discourse about implementing a Uniform Civil Code (UCC) in India is closely tied to the complex issue of women's rights under varying personal laws. The absence of a unified legal framework has led to disparities in how women's rights are treated in matters like marriage, divorce, inheritance, and guardianship across different religious communities. Despite Article 44 of the Constitution advocating for a UCC as a guiding principle, actual legislative efforts have encountered challenges, as seen in recent proposals and state-level initiatives such as in Goa and Uttarakhand. These efforts highlight the ongoing debate over balancing religious diversity with the principles of gender equality and justice. Moving forward, achieving consensus on a UCC that respects India's diverse religious traditions while ensuring equal rights for women remains a crucial goal in shaping the legal landscape of women's rights in the country.

References:-

1. *Ambedkar Backed A UCC, In Future Code May Be "purely Voluntary" To Begin With*. Forbes India. Retrieved June 15, 2024, from https://www.forbesindia.com/article/news/ambedkar-backed-a-ucc-in-future-code-may-be-quotpurely-voluntaryquot-to-begin-with/86361/1
2. Anoushka18. (2023, July 13). *What is Gender Justice?* Sahr. https://www.sa-hr.org/single-post/what-is-gender-justice
3. Associates, A. L. &. (2023, March 1). Adoption by Widow. *A.K. Legal & Associates*. https://aklegal.in/adoption-by-widow/
4. Borroni, A., &Seghesio, M. (2014). The Development of the Anglo-Muhammadan Law in India.
5. Centre, J. (2021, May 6). UCC and Women's Rights. *Juris Centre*. https://juriscentre.com/2021/05/06/ucc-and-womens-rights/
6. *Constituent Assembly Debate on Uniform Civil Code*. Testbook. Retrieved December 5, 2025, from https://testbook.com/ias-preparation/constituent-assembly-debate-on-uniform-civil-code
7. Criminal Revision against Maintenance Orders under Section 125 CrPC/ 144 BNSS – Know the Law – NIKHIL KUMAR AND ASSOCIATES | Advocates High Court Allahabad Lawyers NCLT Prayagraj Lucknow Noida Ghaziabad. (2025, December 6). https://nikhilkumaradvocate.in/criminal-revision-against-maintenance-orders-under-section-125-crpc-144-bnss-know-the-law/
8. CrPC was enacted after 1857 mutiny. (2008, May 5). *The Times of India*. https://timesofindia.indiatimes.com/city/hyderabad/crpc-was-enacted-after-1857-mutiny/articleshow/3010641.cms
9. *Durable Solutions: 5 Implementation Challenges and Possible Pathways for Improvement—Refugee Research Online*. Retrieved November 25, 2025, from https://refugeeresearchonline.org/durable-solutions-5-implementation-challenges-and-possible-pathways-for-improvement/
10. *Fireworks in India for Queen Victoria*. Retrieved November 16, 2025, from https://blogs.bl.uk/untold lives/2021/11/fireworks-in-india-for-queen-victoria.html

11. *Gender Equity and Uniform Civil Code*. Retrieved December17, 2025, from https://www.drishtiias.com/daily-updates/daily-news-editorials/gender-equity-and-uniform-civil-code
12. *Gender Justice: Key to Achieving the Millennium Development Goals*. UN Women – Headquarters. Retrieved October 17, 2025, from https://www.unwomen.org/en/digital-library/publications/2010/1/gender-justice-key-to-achieving-the-millennium-development-goals
13. George, M. (2008). Religious Patriarchy and the Subjugation of Women in India. *The International Journal of Interdisciplinary Social Sciences: Annual Review*, *3*(3), 21–30. https://doi.org/10.18848/1833-1882/CGP/v03i03/52558
14. Jha, S. (2002). Secularism in the Constituent Assembly Debates, 1946-1950. *Economic and Political Weekly*, *37*(30), 3175–3180. https://www.jstor.org/stable/4412419
15. *Just (Uniform) Civil Code*. Retrieved December 15, 2025, from https://www.drishtiias.com/daily-updates/daily-news-editorials/just-uniform-civil-code
16. Kapur, R. (2021). Understanding the Status of Women in Medieval India.
17. Khoje, N. Status of Indian women in ancient, medieval and modern Era.
18. Manupatra. *Mapping The Course: The past, present and the future of the Uniform Civil Code*. Retrieved December 15, 2025, from https://articles.manupatra.com/article-details?id=undefined &ifile=undefined
19. Manupatra. *Uniform Civil Code and Gender Neutral Laws*. Retrieved December 15, 2025, from https://articles.manupatra.com/article-details?id=undefined &ifile=undefined
20. Parashar, A. (2013). Religious personal laws as non-state laws: Implications for gender justice. *The Journal of Legal Pluralism and Unofficial Law*, *45*(1), 5–23. https://doi.org/10.1080/07329113.2013.773804
21. *Personal Laws in India—ClearIAS*.(2025, November 15). https://www.clearias.com/personal-laws-india/
22. President gives approval, Uttarakhand all set to become first state to have UCC. (2026, January 13). *The Times of India*. https://timesofindia.indiatimes.com/city/dehradun/president-gives-approval-uttarakhand-all-set-to-become-first-state-to-have-ucc/articleshow/108459258.cms
23. Raguparan, M. (2014). Gopika Solanki: Adjudication in Religious Family Laws: Cultural Accommodation, Legal Pluralism, and Gender Equality in India: Cambridge University Press, 2011, 400 pp. *Feminist Legal Studies*, *22*(2), 209–211. https://doi.org/10.1007/s10691-013-9234-0
24. Ramesh, M. (2025, October30). *Religious Personal Laws Are Patriarchal, But Is UCC the Way to Women's Rights?*TheQuint.https://www.thequint.com/explainers/religious-personal-laws-patriarchal-is-ucc-the-way-to-women-rights
25. Standard, B. *Uniform Civil Code | Latest News on Uniform Civil Code News | What is Uniform Civil Code?* Retrieved November 30, 2025, from https://www.business-standard.com/about/what-is-uniform-civil-code
26. Standard, B. (2025, November 8). *Explained: How Uniform Civil Code will impact marriage, adoption, inheritance*. https://www.business-standard.com/finance/personal-finance/explained-how-uniform-civil-code-will-impact-marriage-adoption-inheritance-124020800227_1.html
27. Team, N. I. C. (2025, September 30). *Uniform Civil Code: Meaning, Constitutional Provisions, Debates, Judgments & More*. https://www.nextias.com/blog/uniform-civil-code-ucc/
28. *The Personal Laws (Amendment) Bill, 2010*. PRS Legislative Research. Retrieved December 16, 2025, from https://prsindia.org/billtrack/the-personal-laws-amendment-bill-2010
29. Tumane,S.K. THE UNIFORM CIVIL CODE BILL, 2019.
30. *Uniform Civil Code in Uttarakhand soon as panel submits final draft to CM*. Deccan Herald. Retrieved December 6, 2025, from https://www.deccanherald.com//india/uttarakhand/uniform-civil-code-in-uttarakhand-soon-as-panel-submits-final-draft-to-cm-3238157
31. *Uniform Civil Code (UCC) in India: An overview*. Orfonline.Org. Retrieved November 15, 2025, from https://www.orfonline.org/expert-speak/uniform-civil-code-ucc-in-india-an-overview
32. *Uniform Civil Code (UCC): Pros and Cons in a nutshell - Clear IAS*. (2017, March 23). Retrieved November 15, 2025, from https://www.clearias.com/uniform-civil-code-ucc/
33. Women, Personhood, and the Male God: A Feminist Critique of Patriarchal Concepts of God in View of Domestic Abuse—Ally Moder, 2019. Retrieved October 14, 2025, from https://journals.sagepub.com/doi/10.1177/0966735019859471
34. Women's empowerment in India, from ancient period to modern time period. *The Times of India*. Retrieved January 12,2026, from https://timesofindia.indiatimes.com/readersblog/scatteredthoughts/womens-empowerment-in-india-from-ancient-period-to-modern-time-period-46689/

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