

Marital Rape: An Analysis

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Abstract

The objective of this research is to analyse the legal framework surrounding marital rape in India. The study aims to examine the existing laws, judicial decisions, and legal discourse related to marital rape, with a focus on understanding the gaps and challenges in addressing this issue. Most of the legal Scholars in India consider marital rape as one of the most heinous crimes. It presents a distinct form of rape and poses a significant obstacle to achieving gender equality. This problem has persisted in Indian society for a long time, causing unrest. Historically, marital rape has not been acknowledged as a pressing issue in India, and opposition to addressing it is not uncommon for various reasons. Even the Indian Legislature, responsible for enforcing laws for the safety and development of the Country, has shown little interest in eradicating this problem. While Judges in India offer some hope, their ability to address the issue is limited as lawmaking is within the legislature's Jurisdiction. Currently, India lacks specific laws that address marital rape.

Keywords: *marital rape, Indian Legislature, heinous crimes*

Introduction

It has long been believed that the wife's role in a marriage is to care for her husband, to bear children, to care for household matters, to cook, and to provide for the husband's emotional and physical needs. It was first noted in the Manu Smriti which is considered to be the oldest official document in India and has been used to draft Hindu Law.

Women were not given the same status as their male counterparts and, before marriage, were considered the property of their fathers, and after their marriage, they were regarded as possessions of their husbands. The father could marry his daughter to anyone he saw fit. A woman was required to give her husband physical satisfaction with or without her consent and to make sure that her husband's family line continued by giving birth to offspring. This led a woman to believe that being available for her husband is always a necessity and a responsibility. But these laws were written long ago when they were all widely accepted.

Women were considered slaves of men and heinous practices like Sati and child marriage were rampant in the country but the situation changed due to the efforts of Raja Ram

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Mohan Roy and people realised the terrible impact of said social evils on the society. Even Mahatma Gandhi took a big step towards improving the social conditions of women because it was the first time in the Indian Liberation struggle that women shared the same and equal status to their male counterparts. The outcome of these initiatives was that the Constitution provided equality to women and almost all the rights granted to men be it; either the Right to Vote or the Right to stand for election. After independence, there was much progress in almost every field and the focus on women's rights was also supposed to be improved however Instead of it, they were discriminated against again on the basis of their sexual orientation. Women have always fought for their rights and this has been one of the reasons why the status of women and men is equal in the Indian Constitution. There have been many legal changes made after national independence to empower women and improve their status in the country so there is no discrimination based on gender. With the introduction of the Constitution, women are given equal social and political rights as men. Women have been given all the freedoms and support from the Constitution to help shape the future of our country. Mangalyaan's latest example should be cited here because the team included mostly female scientists. Although women have achieved high marks and have struggled in almost every field, whether education, law, or science and technology yet there are many areas where the status of women in our country still takes a beating.

Research Objective:

The objective of this research is to analyze the legal framework surrounding marital rape in India. The study aims to examine the existing laws, judicial decisions, and legal discourse related to marital rape, with a focus on understanding the gaps and challenges in addressing this issue.

Research Questions:

1. What is the legal definition of marital rape in India?
2. What are the prevailing attitudes and societal perceptions towards marital rape?
3. What are the effects of marital rape?
4. What are the existing legal provisions and their effectiveness in addressing marital rape?
5. What are the key judicial decisions and their impact on the recognition and prosecution of marital rape cases?

Research Methodology:

This research will adopt a doctrinal research design, which involves an analysis of existing legal sources, including statutes, case law, legal literature, and scholarly articles. The research will primarily rely on secondary sources to gather and analyze relevant information.

Data Collection:

1. **Statutory Analysis:** The study will involve an in-depth examination of relevant statutes, such as the Indian Penal Code, the Protection of Women from Domestic Violence Act, and other relevant legislations, to understand the legal provisions related to marital rape.
2. **Case Law Analysis:** Judicial decisions related to marital rape will be analyzed to identify the trends, interpretations, and legal precedents established by the courts.
3. **Legal Literature Review:** Scholarly articles, books, reports, and other legal literature will be reviewed to gain insights into the legal discourse surrounding marital rape in India.

By adopting a doctrinal research design, this study aims to provide a comprehensive analysis of the legal framework surrounding marital rape in India. The findings of this research can contribute to the ongoing discourse on addressing marital rape effectively and inform potential legal reforms or policy interventions to protect the rights of survivors.

WHAT IS MARITAL RAPE?

In layman's terms, marital rape is when a spouse engages in sexual activity with their spouse without their consent.

According to Section 375 of the Indian Penal Code –

“Rape means unlawful sexual intercourse or any other sexual penetration of the vagina, anus, or mouth of another person, with or without force, by a sex organ, other body part, or foreign object, without the consent of the victim.”(1)

However, there is an exception provided which says that if non-consensual sexual intercourse takes place between a married couple, in that case, it will not amount to rape(1). Domestic violence refers to the violent or aggressive behaviour within the home which involves the violent abuse of a spouse or partner (2) which takes place with a woman because the husband in all the circumstances is powerful and most males comprehend that marriage gives them the right to have sexual intercourse with the wife at

any point of time whether she is willing or not. This is the face of the patriarchal society; this action damages the marriage arrangement. IPC, 1860 provides for rape and punishment for rape under sections 375 and 376, respectively. (2)

Marriage is a form of social bond between two parties and everything in this institution requires the consent of both parties;

Justice Ahmad in the case of **BodhisattwaGautam vs. SubhraChakraborty** said that **“this cruel act, in turn, destroys the entire psychology of a woman and pushes her into deep emotional crises”** (4). Rape in Marriage is a crime in almost every country in the world today as they have made amendments to their existing laws or by adding new laws for criminalizing marital rape. In the United States, for example, marital rape is a crime and in the United Kingdom, the highest legal sentence for rape is life imprisonment. Countries such as the United Kingdom, and Fiji declared it a serious crime as a result of the decision brought by the courts, in some countries like Brunei the case is openly criminalized. In India, the law on marriage does not exist because women are considered to be the property of men and the state does not interfere with the establishment of the marriage.

Many laws have been enacted in the country to investigate sexual abuse of a woman, such as bribery, domestic violence, or cruelty, but among them is the unprecedented rise in marital rape in the country. Marital Rape is inhuman and the woman knows she has to live her whole life with the perpetrator which has a negative physical and psychological impact on her. It is a rare crime in the country because most of these women know that going to the authorities will be in vain as there are no laws against rape in marriage; also, they cannot deal with public outcry.

Laws must be updated in the twenty-first century, as society becomes more aware of its rights and needs. Sexual intercourse with a wife who is under the age of 15 is illegal, according to the Indian Penal Code of 1860. This circumstance does, however, have a flaw. Child marriage is merely voidable and not void in India, according to the Prohibition of Child Marriage Act, 2006, which means it is not immediately unlawful. When the minor party reaches the majority, he or she has one year to seek a divorce; otherwise, the marriage is considered valid. However, until the party reaches legal age, and because there is no provision for males to seek consent from their wives aged 15-18 years, this allows husbands to have sexual relations with their wives until they reach the age of majority. Non-consenting intercourse between a 50-year-old man and a 16-year-

old girl is permitted, while consensual intercourse between a 17-year-old male and a 17-year-old girl is illegal.

Under the Protection of Women from Domestic Violence Act, 2005, the definition of domestic violence is given under Section 3(a) which says that “*harms or injures or endangers the health, safety, life, limb or well-being, whether mental or physical, of the aggrieved person or tends to do so and includes causing physical abuse, sexual abuse, verbal and emotional abuse and economic abuse*”.(3) Sexual abuse mentioned under this definition includes any conduct of a sexual nature that abuses, humiliates, degrades or otherwise violates the dignity of woman(3), which in turn gives a chance to wives to initiate legal proceedings.

The drawback of this act is that it is more civil than criminal. It does not provide for a period of imprisonment. Rather it provides for compensation, monetary gain, restraining and protective orders

EFFECTS OF MARITAL RAPE

Marital Rape leaves scars on a woman's life; which includes physical, psychological and emotional problems damaging women's emotional well-being over time. This section is broadly divided into psychological and health issues a woman may encounter during or after a rape.

▪ **PSYCHOLOGICAL EFFECTS**

Women who have had encounters relating to Marital rape have had cases of depression, PTSD, fear, self-esteem issues, rape trauma syndrome and also being sexually unstable, unavailable or dysfunctional.(11)

When a woman marries, she is expected to satisfy her husband's sexual desires right away. Any female must have been shocked the first time she encountered this, that such a thing could be necessary without her agreement. Any subsequent events must appear horrible yet numb to her, but she understands that resisting or refusing to obey her lover is futile. The woman is concerned that her family's reputation may be harmed. As a result, she feels compelled to keep her family's name.

Rape Trauma Syndrome is the medical term given to the response that survivors have to rape and it is the natural response of a psychologically healthy person to the trauma of rape (3). This may be immediate or may occur after months or even years. The victims may feel humiliated or degraded. The victims may also feel confused as to why this happened and how could they not help themselves during the incident. Some victims may

also blame themselves for being weak not to stop it or for not wanting sexual intercourse as their husbands want them to (3). Self-blame is a common psychological after-effect of rape, and it causes the victim to develop Post-Traumatic Stress Disorder as a result of their helplessness in not being able to prevent themselves from being raped and then blaming themselves to excuse it. Because this isn't even considered a problem, victims may feel shame and embarrassment if they inform anyone. They believe this is a forbidden subject, and that discussing it with others will elicit stares and questions.

The case of **BodhisattwaGautam v. SubhraChakraborty**(12), a criminal complaint was filed based on a consensual affair and a questionable finding of rape due to failure to marry. Also, in a hearing for criminalizing marital rape, Hon'ble Delhi High Court in 2018 said that: *“Force is not a pre-condition for rape. If a man puts his wife under financial constraint and says he will not give her money for household and kids expenses unless she indulges in sex with him and she has to do it under threat.”*(13)

All of these circumstances impose mental strain on the person and any children they may have. This can lead to a major mental breakdown or clinical depression in the children. As a result, it becomes clear that such crimes not only harm a mother and her life, but also have serious consequences for the children's health, resulting in a vortex effect.

▪ **HEALTH ISSUES**

Although the Protection of Women from Domestic Violence Act of 2005 includes provisions, but it solely covers civil culpability for sexual abuse. (5)The purpose for the violent behaviour could be to demonstrate control and instill fear that if they do not achieve what they want, they would turn to violence. Due to numerous rapes, the majority of women have chronic pain. Broken ribs, knife wounds, body marks from the assault, and black eyes are all possible outcomes. These are just a handful of the problems that women face. The majority of sufferers have complained of vaginal soreness and bleeding. The vaginal lining is ruptured, which causes bleeding. Bleeding, pain, and irritation are common complaints among those compelled to have anal sex. If they are reminded of the incident of abuse, they may feel nauseated. Unwanted pregnancies can occur as a result of this, putting the person under additional mental and psychological strain. Particularly if the victim is between 15 -18 years, this may necessitate early birth, which can have major consequences for the child. Vaginal rupture can also result in infertility, resulting in the victim's inability to produce children. If the victim ever wants to start family planning, this can have a major negative impact on their future. It's possible that they'll be permanently scarred. Victims may be compelled to commit suicide as a result. Because of

the perceptions surrounding marital rape and the victim's inability to inform anybody about the abuse, the victim may consider suicide to be the only alternative.

EXAMINING THE RECENT CONTRASTING DECISIONS OF THE CHHATTISGARH HIGH COURT AND KERALA HIGH COURT ON THE EXCEPTION TO SEC 375 OF THE IPC FOR MARITAL RAPE.

Due to inconsistent court verdicts on marital rape, activists have revived their calls to criminalise rape within marriage. The Chhattisgarh High Court ruled that "sexual intercourse or any sexual act by a husband with his wife would not constitute rape even if it was by force or against her wish" in a criminal case brought by a woman accusing her husband of "unnatural sex" and raping her with objects.

The court based its decision on an exception outlined in Section 375 of the Indian Penal Code, which states that any act of sexual intercourse between a man and his wife if the wife is not under the age of 18, does not constitute rape; thus, the court ignored the elements of the women's will, consent, and health. It is only a criminal if the woman is under the age of 18 or if she is separated from her husband judicially; other factors are ignored. (14)

In a civil case, the Kerala High Court declared that "a husband's licentious disposition neglecting the autonomy of the wife is a marital rape, even though such behaviour cannot be penalised." However, as proclaimed in Sec. 13(1) (IA) of the Hindu Marriage Act, physical and mental cruelty can be a legal reason for divorce.

In a 2017 affidavit to the Delhi High Court, the Union Government declared that sexual intercourse during marriage should not be added as an extra cause for women to apply for divorce.

Section 375's exception for marital rape reflects deep-seated prejudice and centuries of discrimination, oppression, and objectification of women at the hands of patriarchal society. Arguments have been made for the repeal of this draconian rule, claiming that it violates numerous aspects of the Indian Constitution's spirit, including equal protection, freedom of expression, and the right to life and liberty clause, as embodied in Articles 14 and 21 of the Indian Constitution. (15)

Equal Protection Clause (Article 14)

Article 14 of the Indian Constitution ensures that all citizens are treated equally before the law. To pass the Article 14 test, any classification must meet two requirements:

1. It must have a rational connection to the goal it seeks to achieve; and

2. The classification criteria must be based on Intelligible Differentiation.

No rational nexus with the object sought to be achieved

Section 375's purpose is to safeguard every woman's bodily integrity, dignity, and privacy from being violated. Despite this, it exempts forcible sexual intercourse within a marriage from criminality. While married women have a legal remedy in the instance of rape by a stranger under Section 376 of the IPC, they have none in the case of rape by their husband.

The Government of India argued in front of the Delhi High Court that criminalising marital rape would undermine the sacred institution of marriage. A marriage in which a woman has no say, on the other hand, is not worth preserving, and establishing marital rape as a crime will operate as a check on men's control in conjugal relationships. As a result, the government cannot use this as a pretext to conceal sexual cruelty and brutality within marriage. As a result, the exception set forth in section 375 has no reasonable connection to the goal sought, namely physical liberty and safety.

No intelligible differentia

The classification assumes that when a woman marries, she implicitly irreversibly consents to sexual intercourse, echoing the traditional view of women's non-agency. At any age, one's bodily integrity must be respected. As a result, section 375's exemption 2 creates an arbitrary and unjustifiable distinction between married and unmarried women, in violation of Article 14 of the Constitution, and therefore must be repealed.

Article 21 of the Constitution guarantees the right to life and liberty.

Every individual has the right to life and personal liberty under Article 21 of the Constitution. It has been profoundly interpreted by the judiciary from time to time, making it more comprehensive and inclusive, including a slew of other essential rights, including the right to bodily self-determination, the right to sexual privacy, and the right to health, among many others, all of which are grossly violated by the exception provided in section 375.

Right to dignity

Rape, according to the Supreme Court, is an act of "**deathless shame and the gravest offence against human dignity.**" However, in the instance of a married woman, the law now views rape as a crime against her husband's dignity rather than a crime against her own. This is because a stranger can be prosecuted for infringing on a married woman's

dignity.' When the same woman is raped by her husband, however, it does not constitute a violation of her right to live in dignity.

Right to sexual privacy

According to the Supreme Court, Article 21 of the Indian Constitution guarantees liberty. The Supreme Court has ruled that a woman should not be considered a commodity with no physical autonomy or right to refuse sexual relations with her spouse on her own. While deciding on the scope of section 375 of the IPC's applicability in the case of a minor wife, the Supreme Court stated in Independent Thought that sexual violence is an invasion of a woman's right to privacy. This privilege, which every woman has, ensures that she is not a man's toy and that no one can infringe on her private.

In addition, the Supreme Court recently held in

Joseph Shine v. Union of India (2018) that a woman is not a chattel or property of males and that every woman, regardless of marital status, has the intrinsic right to sexual autonomy, the Supreme Court slammed the notion that when a woman marries, she relinquishes her sexual agency to her husband, arguing that sexual autonomy is an inalienable part of human dignity. The union government, on the other hand, has tried to rationalise that sexual intercourse between a man and his wife is private and that any intrusion would be an invasion of their privacy. In terms of the privacy of a husband and wife's relationship, there are already laws in place in India that deal with a variety of intimate and private issues connected to the marital sphere.

A similar point was made in the landmark **Puttaswamy decision of 2017**, in which the Supreme Court recognised that the privacy argument should not be used as a cover for women's maltreatment and patriarchal attitude statement.

Furthermore, the right to privacy encompasses the ability to be left alone without being bothered by others. Marital rape deprives a married woman of her right to life by forcing her to engage in a sexual connection against her will.

Right to good health

Another important argument to support the repeal of the marital rape exception provision is that it is harmful to one's health. The challenged exemption deprives the victim of their right to good health by exposing them to substantial physical injury such as miscarriages, infertility, bladder infections, and serious injuries to their private parts. It may also cause anxiety, despair, shock, post-traumatic stress disorder, low self-worth, and suicidal thoughts. This is much more dangerous when the non-consensual sexual act is coerced

and can result in the transmission of sexually transmitted diseases. As a result, the marital exemption theory essentially deprives a married woman of her right to good health, making it illegal.

WHY DO SOME PEOPLE ADVOCATE MARITAL RAPE?

The majority of individuals believe that marital rape should not be criminalised. This shapes public perception and paints a picture of the country that is unchangeable. These views have gained traction since the majority of Indians are culturally engaged and feel that the laws that governed India a thousand years ago still apply now. Furthermore, these arguments are irrelevant in today's world because the exception is discriminatory. Here are several counter-arguments and their counter-arguments.

- **Matrimonial Institutional Sanctity**

The primary reason for not criminalizing marital rape is that it would jeopardize the marriage's integrity, which would then jeopardize the family. The holy link that exists between a husband and a wife would be shattered, and the purpose of marriage would be lost. Criminalizing marital rape would indicate that the state is straddling the line between home and law, putting the judiciary in a difficult position. The state would be crossing borders and going beyond its jurisdiction if it passed legislation enabling this. Marriage is a contract between two people, and any decision that crosses this boundary may be viewed with hostility.

- **Marriage is consent**

Marriage is the legal formation of a human connection between two people. Persons have also argued that since these people entered into this contract voluntarily, the woman has already consented to the marriage. If she does not want to marry, her parents must match the matrimonial relationship, which is considered consent. The practice of not seeking the consent of the lady is common. While consenting to marriage or having their marriage set by their parents, the husband is regarded to offer his assent to a sexual relationship. Marriages that are arranged and those that are forced are two different things.

When both parties choose to marry after meeting one other, it is referred to as an arranged marriage, whereas forced marriage occurs when one or both parties refuse to marry.

- **Cultural boundaries**

From childhood, people have been educated to follow particular traditions, conventions, and ideals. These values have been imprinted on one's mind, and anything that deviates from them or does not fit the frequency is considered prohibited. People have been taught

that it is natural for a guy to expect his wife to meet his sexual wants as a result of these socio-cultural standards. Culture is what gives a country its identity.

- **False Cases**

A vast majority of individuals have also argued that if marital rape legislation is passed, some wives will use it to walk out of their marriages or to bully their spouses into doing anything by threatening to use the legislation. **In Arnesh Kumar v. State of Bihar**, the Supreme Court ruled that unhappy women are using Section 498A as a weapon rather than a shield. It would then be the men who would be scrutinised by the courts every second.

- **Preexisting legislations**

Marital rape is supposed to be addressed by the Protection of Women from Domestic Violence Act of 2005. Arguments are made that if this legislation is already in effect, the state does not need to pass its legislation. (6) Section 3 can be used to prosecute rape in the home (a) “harms or injures or endangers the health, safety, life, limb or well-being, whether mental or physical, of the aggrieved person or tends to do so and includes causing physical abuse, sexual abuse, verbal and emotional abuse and economic abuse”. There is already a measure in place to protect the wife from the husband's sexual and verbal abuse.

WHY ARE PEOPLE IN SUPPORT OF ITS CRIMINALISATION?

- **Sanctity is Distorted**

The sacredness of matrimony is already tarnished when a man has sexual intercourse with his wife without her consent. There is no going back and claiming that marital rape is excluded because it crosses the line between a man's and his wife's concerns. Similarly, the Gujarat High Court, in the instance of **NimeshbhaiBharatbhai Desai v. State of Gujarat**, it was held that the “non-consensual act of marital rape violates the trust and confidence within a marriage and the prevalence of marital rape in India is what has damaged the institution of marriage”. When the concept of sanctity has been contradicted, this argument becomes ethically flawed.

- **Consent is Important**

Child marriage is now voidable rather than void under the 2006 Prohibition of Child Marriage Act. Parents can marry off their young children to anybody they want, and the children cannot divorce or dissolve their marriage until they reach the age of majority, which is 18 years old. Section 375 of the Indian Penal Code (IPC) of 1860, on the other

hand, prohibits a man from having sexual relations with a wife who is under the age of 15 years. For people between the ages of 15 and 18, however, this provides a loophole. They must live with someone who may or may not compel them to engage in sexual activity against their will.

▪ **A Criminal Liability**

In exchange for civil liability, the Hindu Marriage Act and the Domestic Violence Act provide women with a way to remove themselves from a dangerous circumstance. People have claimed that if there is already a domestic violence law in place that includes 'sexual abuse,' why do Indian women want a new law? Only civil culpability is provided by the Protection of Women Domestic Violence Act of 2005. Furthermore, in civil liability, the criminal might simply compensate the victim. The culprit of this atrocity must be held accountable.

CONCLUSION AND SUGGESTIONS

CONCLUSION

Marital rape refers to non-consensual sexual acts committed by a spouse against their partner within the institution of marriage. In India, the legal framework surrounding marital rape is complex and controversial. As of now, marital rape is not explicitly recognized as a criminal offence under Indian law. The Indian Penal Code (IPC) provides an exception to rape within marriage under Section 375, which states that sexual intercourse by a man with his wife, who is above the age of 15, is not rape. (16) This exception is based on the belief that marriage implies consent to sexual relations, regardless of the circumstances. However, it is important to note that this provision is inconsistent with the principles of gender equality and bodily autonomy. Several arguments have been put forth both in favour of and against criminalizing marital rape in India. Supporters of criminalization argue that it is a violation of a woman's fundamental rights, including her right to live with dignity and bodily integrity. They argue that the exemption in the law perpetuates gender inequality and fails to protect women from sexual violence within the confines of marriage. Opponents of criminalization often cite cultural and societal factors, such as the sanctity of marriage and the potential for misuse of the law. They argue that criminalizing marital rape could undermine the institution of marriage and lead to false accusations against husbands. Some also contend that existing laws, such as domestic violence legislation, are sufficient to address the issue. Despite ongoing debates, there has been a growing recognition of the need to address marital rape in India. The Justice Verma Committee, formed in the aftermath of the 2012 Delhi gang

rape case, recommended criminalizing marital rape. Additionally, the Supreme Court of India has acknowledged that marital rape is a form of violence and a violation of a woman's rights. However, progress towards criminalizing marital rape has been slow. The Indian government has expressed reservations, citing concerns about societal backlash and the need for further societal consensus. Activists and women's rights organizations continue to advocate for legal reform, emphasizing the importance of consent, gender equality, and the protection of women's rights.

In conclusion, the issue of marital rape in India remains a complex and contentious topic. While there is a growing recognition of the need to criminalize marital rape, legal reform and societal change are necessary to ensure the protection of women's rights and promote gender equality within the institution of marriage.

SUGGESTIONS

Marital rape is a serious issue that deserves attention and action. It refers to any unwanted sexual activity forced upon a spouse without their consent. Despite its prevalence, it remains largely underreported and often dismissed due to societal norms and misconceptions surrounding marriage. However, it is crucial to recognize that consent is a fundamental aspect of any sexual relationship, including within marriage.

- A. Raise awareness: Educate the public about the concept of marital rape, its impact on victims, and the importance of consent within a marital relationship. This can be done through public campaigns, workshops, and media platforms.
- B. Legal reforms: Advocate for legal reforms that recognize marital rape as a criminal offence. Many countries still do not have specific laws addressing marital rape or have laws that provide insufficient protection for victims. Encourage lawmakers to revise legislation to ensure that marital rape is treated with the same severity as any other form of sexual assault. (17)
- C. Support services: Establish and promote support services for victims of marital rape. This includes helplines, counselling centres, and safe shelters where victims can seek assistance, guidance, and protection.
- D. Education and prevention: Implement comprehensive sex education programs that emphasize consent, healthy relationships, and gender equality. By educating individuals from a young age, we can help prevent the perpetuation of harmful attitudes and behaviours related to marital rape.
- E. Changing societal attitudes: Challenge societal norms and beliefs that perpetuate the idea that a spouse is entitled to sex without consent. Encourage open

discussions about consent, gender roles, and power dynamics within relationships to foster a culture of respect and equality.

Support for survivors: Provide adequate support and resources for survivors of marital rape, including medical care, legal aid, and counselling services. It is essential to create a safe and non-judgmental environment where survivors can heal and rebuild their lives.

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