

## **An Analytical Study on Whether Domestic Incident Report by Protection Officers Should Be Mandatory or Obligatory Under the Domestic Violence Act, 2005**

**By**

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### **Abstract**

Past literature on domestic violence reveals not just under-reporting of domestic violence, but also indicates that the legal proceedings and convictions against abusers of domestic violence are low. Women hesitate to approach state appointed authorities and prefer to approach courts directly or through lawyers, because Protection Officers are either absent or not very helpful in most cases. This option to either approach the Protection Officer or the court, is made available to women u/s 12 of the Protection of Women from Domestic Violence Act, 2005. This option makes the appointment of a Protection Officer pointless and insignificant. This has further resulted in the courts interpreting that the Domestic Incident Report, which is to be prepared by the Protection Officer is not mandatory. A Domestic Incident Report is an important document which is somewhat akin to a First Information Report in criminal law. It has to be submitted by the Protection Officer after due investigation. In the absence of a Domestic Incident Report, due process of law and the principles of natural justice are lost. Research has revealed gross inefficiency and misuse of this law, which further leads to a miscarriage and travesty of justice. There is an urgent need to salvage this situation by making amendments to the provisions of the Protection of Women from Domestic Violence Act, 2005.

**Keywords** - Domestic violence, Protection Officers, Domestic Incident Report, Mandatory, Justice

### **Introduction**

The report of the National Family Health Survey (NHFS – 4) has stated that 30% of Indian women in the age group of 15 to 49 have experienced physical violence since the age of 15 years, and 6 % have experienced sexual violence at least once in their lifetime. The report further states that 31% of married women have experienced physical, sexual and emotional violence from their spouses. However, only 1% of such women have sought help or initiated any legal proceedings against their abusers. Such violence against women blatantly violates Articles 14, 15 and 21 of the Constitution of India, which provide for equality before law and equal protection of law, and that the State shall not discriminate against any citizen on the basis of caste, creed and sex. Most importantly it is a violation of every person's right to live with dignity. The Protection of Women from Domestic Violence Act, 2005 (the "Act") is an

enactment that protects the rights of women to reside in homes free from violence. This Act, along with the Protection of Women from Domestic Violence Rules (the “Rules”), provides for the procedure to be followed in cases of complaints of domestic violence.

Section 12 of the Act elucidates that an aggrieved person, or Protection Officer (PO) or any person on behalf of the aggrieved person may file an application to the Magistrate seeking relief against domestic violence, as provided under the Act. Proviso to the section 12 states that before passing any order for relief, the Magistrate shall consider the Domestic Incident Report (DIR) received from the PO. But if the aggrieved person does not approach the PO and directly files an application u/s 12 to the court or through a lawyer, then there would be no DIR filed. Thus in most cases the Magistrates apply their discretionary powers i.e. their right to make official decision by using reason and judgment to choose from accepted alternatives, based on facts and circumstances of every case. The Magistrates apply this discretionary power in cases of domestic violence where it is only obligatory for the PO to file a DIR and not mandatory. In *Narayanakumar v. State of Karnataka and Anr.*<sup>1</sup> it was held that an aggrieved person is not bound to go to the PO in every case and hence, the DIR is not required to be mandatorily submitted in complaints made directly to the Magistrate by the aggrieved person.

Preparation of DIR is an important part of a judicial proceeding initiated u/s 12 of the Act. The PO, who u/s 30 is deemed to be a public servant within the meaning of section 21 of the Indian Penal Code, and who functions under the control and supervision of the concerned Magistrate as provided u/s 9 of the Act, is under a duty to investigate and explore facts after consulting both the parties and record the reality. He is duty-bound to visit the shared household where the domestic violence is alleged to have occurred. The main purpose of the DIR is to ascertain the truth as to whether the application is false or vexatious. This can save the accused respondents from undue embarrassment and more importantly save the time of the courts. In short, the DIR should aid in advancing justice by following the due process of law and the principles of natural justice. The preparation of the DIR should be considered as a mandatory procedure. Any DIR based on verbal statements of the aggrieved person alone should be considered as a violation of the due process of law.

The DIR is a comprehensive report of the aggrieved person which contains her specific details, details of the people who committed the violence, incidents and types of violence, date and time of violence, etc. The DIR constitutes valuable evidence of the past incidents of domestic violence and it also helps in establishing a prima facie case in the court. It is imperative for the Magistrate to call upon the DIR to ascertain the verity of every case of domestic violence so that justice can be accorded in the right direction. DIR should be made mandatory to avoid any miscarriage of justice.

The researchers in this research paper, have adopted the doctrinal method to understand the need and importance of the DIR based on collection of required data. The entire research is based on studies through theoretical, analytical and critical findings. Primary and secondary sources of data have been relied upon, to arrive at the relevant findings and to provide credible recommendations. The primary sources includes the Constitution of India, the Protection of Women from Domestic Violence Act, 2005 and the Protection of Women from Domestic Violence Rules, 2006, while the secondary sources include articles published in law journals, various case laws, research papers presented in different conferences, seminars and various e-

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<sup>1</sup> 2010 ALL MR (Cri) Journal 158

sources from the library of CHRIST (Deemed to be University) Pune, Lavasa campus. The researchers have taken this aspect of the topic with the following aims and objective;

- 1) To study the conceptual framework of the Act with specific reference to the Domestic Incident Report.
- 2) To study the practical implementation of the provisions of the Act by the Protection Officers.
- 3) To ascertain the challenges faced by the victims of domestic violence.
- 4) To arrive at and suggest solutions for better implementation of the Act.

## **Importance of Domestic Incident Report**

Whenever an application u/s 12 is filed by a wife against her husband and other relatives, claiming domestic violence, the Act requires certain documents to be attached, which forms part of the application. The DIR is one such document. In fact, the DIR is the prima facie paper of the whole case file. Section 2 ( e ) of the Protection of Women from Domestic Violence Act, 2005 defines a Domestic Incident Report as a report made by the Protection Officer, in the prescribed form, on receipt of a complaint of domestic violence from the aggrieved person. The DIR is exclusive to the Domestic Violence Act and is prescribed in Form I appended to the Protection of Women from Domestic Violence Rules. A DIR somewhat corresponds to a First Information Report (FIR) under criminal law as it is an authentic public record of a complaint in writing. A PO is required to fill up the DIR on receipt of a complaint and it is required to be signed by the aggrieved person and the PO. A DIR is only a record of the complaint in the prescribed form and not a report of the investigation. No inquiries are conducted by the PO at the time of preparing the DIR. The investigation and the judicial process commences only if and after the aggrieved party files an application in the Court u/s 12 of the Act. In *Abhiram Gogoi vs. Rashmi Rekha Gogoi*<sup>2</sup>, the Gauhati High Court has reiterated that Section 9(1)(b) of the Act clearly mandates that it is the duty of the Protection Officer to make a Domestic Incident Report to the Magistrate upon receipt of a complaint of domestic violence and forward copies thereof to the police officer-in-charge of the local police station and to the service providers in that area. In *Rama Singh vs. Maya Singh*<sup>3</sup>, and in *Ravi Dutta vs. Kiran Dutta and Another*<sup>4</sup> the respective High Courts have observed that the Proviso to Section 12 is mandatory and an order passed by the Magistrate on an application u/s 12 of the Act, without having a report of the Protection Officer is liable to be quashed. Unfortunately, the concept of DIR has been lost in the wordily interpretations of the courts.

## **Judicial interpretations of Domestic Incident Report**

The Proviso to Section 12(1) of the Act states that before passing any order of relief on an application made u/s 12, the Magistrate shall take into consideration any domestic incident report received by him from the protection officer or the service provider. The language of the statute clearly states that before passing any order, the Magistrate is required to consider the DIR. However, there has been a plethora of cases which have laid down that the consideration of the DIR is not mandatory, but only obligatory, and only in cases where the aggrieved person approaches a Protection Officer, a DIR needs to be considered.

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<sup>2</sup> (2011) 4 Gauhati Law Reports 276

<sup>3</sup> (2012) 4 MPLJ 612

<sup>4</sup> 208 (2014) DLT 61

In *Bhupender Singh Mehra vs. State of NCT of Delhi*<sup>5</sup> it was held that if without consideration of the DIR, orders for relief are passed, then the case should be remanded back for consideration of DIR. However this decision has been overruled by the Supreme Court recently in *Prabha Tyagi vs Kamlesh Devi*<sup>6</sup>. The Hon'ble Supreme Court has held that the procedure of consideration of DIR before issuance of process is not mandatory. It is mandatory only when the protection officer or the service provider approaches the magistrate. But if the aggrieved person complaints directly to the magistrate, then the DIR is not mandatory.

In the case of *Md. Basit vs. State of Assam and Others*<sup>7</sup>, the Gauhati High Court held that the provision u/s 12 does not require a Magistrate to specifically call for a Domestic Incident Report. The court stated that the consideration of DIR would be mandatory only if it had been filed by the Protection Officer before the Magistrate.

In *Rakesh Choudhary vs. Vandana Choudhary*<sup>8</sup>, the petitioner submitted that the report of the Protection Officer is sine qua non for issuing process in a petition u/s 12 of the Act. The High Court of Jammu and Kashmir rejected this argument and held that the proviso to Section 12(1) of the Act only stipulates that the Magistrate shall take into consideration the Domestic Incident Report when filed by the Protection Officer or the Service Provider. It does not stipulate that a report 'shall be called for' before any relief could be granted.

Further, the High Court of Bombay at Aurangabad Bench, while dealing with a criminal writ petition in the case of *Vijay Maruti Gaikwad vs. Savita Vijay Gaikwad*<sup>9</sup>, observed that the Court is not bound to call the report of Protection Officer, if the matter is before the Court and the wife preferred not to approach the Protection Officer. The High Court of Chhattisgarh, in the case of *Suraj Sharma vs. Bharti Sharma*<sup>10</sup>, also held that the Domestic Incident Report shall not be conclusive material for making any order.

Hence if the aggrieved person approaches the court directly or through a lawyer, the concerned Protection Officer is not involved at all. He does not visit the house where the domestic violence is alleged to have occurred nor does he call the husband and his parents who are accused, or even their relatives or neighbours for preparation of such DIR. In most of the cases of domestic violence, no accused is ever called for any investigation. Immediate relief to the aggrieved person was the purpose of the Act; therefore, according to the high court of Himachal Pradesh, to suggest that the Magistrate has no jurisdiction to take cognizance of the application u/s 12 of the Act without the receipt of a Domestic Incident Report by the Protection Officer or the service provider was wrong.<sup>11</sup>

## **Role of Protection Officers**

Protection Officers are the key authorities in the implementation of the Act. They are appointed u/s 8 by the State Governments in each district as considered necessary and they are preferably required to be women. Their tenure, which is a minimum of three years and their qualifications are as prescribed as per rule 3 of Protection of Women from Domestic Violence

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<sup>5</sup> Cri. M.C. No. 1766 of 2010, Dt.8/10/2010

<sup>6</sup> 2022 SCC OnLine SC 607

<sup>7</sup> (2012) 1 Gauhati Law Reports 747

<sup>8</sup> 2019 SCC Online J&K 512

<sup>9</sup> 2018 (1) HLR 295

<sup>10</sup> 2016 SCC Online Chh 1825

<sup>11</sup> *Rahul Soorma vs. State of Himachal Pradesh* – [(2012) SCC Online HP 2574]

Rules. PO can be either members of the government or non-governmental organisations. The duties of the PO are clearly chalked out u/s 9 of the Act.

On receiving a complaint of domestic violence, the primary duty of a PO is to inform the aggrieved person of her rights and must ensure that the aggrieved person or her children are not victimised or pressurised during the inquiry and preparation of the DIR. Rule 5 provides that after thorough investigation of the incident, he must prepare a Domestic Incident Report. After preparing the DIR in the prescribed manner, the PO is required to forward the same to the local police officer and to the service provider. He is also required to make an application on behalf of the aggrieved person u/s 12 to the Magistrate. A PO is required to aid and assist an aggrieved person by providing her safety, and facilitate access to support services, shelter homes, and medical facilities. He also needs to facilitate the court procedure, conduct home visits, assess the facts of the case, prepare economic status report and help the woman regain custody of her children.

Thus, a Protection Officer plays a vital role in implementing the Act and filing a DIR. During the litigation, the Magistrate directs the PO to supervise and perform such functions as provided in rule 10 of the Protection of Women from Domestic Violence Rules. Before passing any order of relief, the Magistrate assigns the PO to make inquiries for clarification in the case and to establish the truth.

## **Problems in preparing Domestic Incident Report**

There are some practical problems in the exercise of obtaining and presenting a DIR. Firstly, it is a clerical job and the learned Magistrates cannot do it themselves. And secondly, the protection officers lack the qualification and training required for handling of inquiry and preparation of DIR. Unfortunately, many of the Protection Officers do not know about the technicality of this important document, which is the basis to judge the case for the judiciary.

For nearly three to four dates the DIR is not even submitted by the protection officers causing unreasonable delay in cases. This is a serious issue that needs to be tackled for effective implementation of the Act. The Supreme Court in the case of Santosh Bakshi V. State of Punjab & Ors.<sup>12</sup>, emphasised that investigation is a serious matter in cases of domestic violence, and a DIR is required to be submitted with proper verification and investigation. However, in practice and in most cases, the PO prepares DIR only based on the verbal statements of the aggrieved person without verifying its content and authenticity. It would not be wrong to say that a DIR is nothing but a photocopy of the main application made u/s 12 of the Act.

The functioning of protection officers in practice is riddled with problems which makes reporting of domestic violence a harrowing experience for women. According to Audrey D'Mello, a lawyer at Majlis, an NGO in Mumbai, protection officers often lack the sensitivity that is required to deal with the victims of domestic violence. They are often missing from their office under the guise of field work, and make the victims run from pillar to post. This is one of the major reasons that the majority of victims of domestic violence prefer to approach private lawyers instead of a free, state-appointed protection officer.

Women prefer to approach lawyers because according to section 12 of the Act, an aggrieved woman has the option of filing a domestic violence complaint directly approaching a magistrate through a lawyer. Only if she first approaches the police station, or a hospital, or

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<sup>12</sup> Criminal Appeal No. 1251 of 2014

a shelter home or non-governmental organisation, then these stakeholders are required to direct her to a protection officer.

In most of the cases, the Domestic Incidence Report is not filed and if filed, a considerable length of time passes before the report reaches the court, resulting in dilution of the gravity of the case. Moreover, the report so presented is prepared in a very haphazard manner and this affects its evidential value. All these factors eventually pose hurdles in ensuring speedy justice to the aggrieved person.

## **Misuse of the enactment**

The Act is prone to great misuse as it presumes guilt even before the trial begins, only on the testimony of a woman alleging domestic violence. Arrest can be made on a mere complaint by the women and the absence of a DIR, which means prejudging and punishing the accused arbitrarily without due process of law. Very often this law is utilised to facilitate divorce or to make the most of a failed marriage by some urban middle class women to extract a large alimony. There are some unfortunate situations where some women initiate frivolous proceedings against their husband and his relatives for harassing them or for extorting money by legally blackmailing them. This is sheer abuse of law at the hands of a few unscrupulous women. This has resulted in the victimisation of countless innocent women, because there are no legal repercussions of filing a false case. There have been cases where members of a family have used the provisions of this law to advance money from the opposite side. Thus, in such cases it is extremely difficult to ascertain a genuine and bona fide case from a bogus one.

Though such problems are few in number, they dilute the stringency of the law. Furthermore, with the absence of the mandate of a DIR, there is no way to keep a check on whether a complaint is frivolous or not. Due to the lack of investigation by the PO, the party who is adversely affected has no recourse as there is no provision of penalty or punishment in case of a frivolous applications.

According to this Act, any woman who lives with a man for two to three months can at any point seek relief at par with his wife, which leads to a mockery of laws against bigamy. A bench of Justices Markandey Katju and TS Thakur, have cautioned that claims for financial relief arising out of live-in link-ups would increase in India in future. The Supreme Court of India has noted that just any “live-in relationship” does not entitle a woman to alimony. Merely spending weekends together or a one-night stand would not amount to a domestic relationship. To make a “live-in relationship” legal the Supreme Court in *D Velusamy vs. D Patchaiammal*<sup>13</sup> has laid down certain conditions. The conditions are that the couple must hold themselves out to society as being akin to spouses; they must be of legal age to marry; they must be otherwise qualified to enter into a legal marriage, including being unmarried; and they must have voluntarily cohabited for a significant period of time.

An in-depth research by Ramanathan, V has found that false complaints of domestic violence are rampant under the Act. Statistic reveals that more and more men are falling prey to the domestic violence law. In its desire to protect the women in their domestic spheres, the Act instils so much faith in the victims, that it does not mention anything about the proof of claims which could make this law a mockery of itself.

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<sup>13</sup> 2010 (10) SCC 469

## Miscarriage of justice

Time and again, our judiciary has emphasised the importance of the protection of one's fundamental rights which are enshrined in Part III of the Constitution of India. These fundamental rights are basic human rights and are based on the principles of natural justice. One of the main principles of natural justice demands fairness in the judicial process wherein all the parties are given an opportunity to express their side of the issue. This principle is expressed in the Latin maxim 'Audi Alteram Partem' which means "let the other side be heard as well". It is the cardinal principle of natural justice, whether it is a judicial proceeding or an administrative inquiry, that either party should be given a fair opportunity of being heard. However, in many cases of domestic violence, the DIR is prepared without giving the respondent's side any opportunity of being heard. Generally speaking, when a wife approaches the police with a case of domestic violence, all are in favour of the wife and not the husband. The law is one sided even in the present day urban environment. But in certain cases if a wife is a problem creator, then adjudicating the case without a DIR, would be a travesty of justice.

There is an urgent need for the judiciary as well as legislature to take effective steps so that during preparation of DIR, fair procedure is followed bearing in mind the basic spirit of the principles of natural justice so that no accused of domestic violence shall be deprived of his fundamental rights.

## Current Scenario of Protection Officers

Even after 18 years since its enactment, the implementation of the provisions of the Protection of Women from Domestic Violence Act has not been taken up uniformly across the country. Jagori, an organisation in Delhi that offers support services to women, has stated that at least 25 cases of domestic violence are heard in Delhi courts every day. But only one PO for each of its 11 districts has been appointed and that too working on a part-time, not full-time basis. POs are also given other responsibilities by the Women and Child Development department. Some states have appointed very few POs, some other states have assigned too many other responsibilities to the existing POs, while a few states have not yet appointed POs at all. In Maharashtra, to qualify for the post, protection officers are required to be graduates and need to qualify a special entrance test. However, their qualifications as well as their nature of appointments differ from state to state.

According to the Act, protection officers are required to be appointed as full-time workers. But this rule is flouted not only in Delhi, but also in Chhattisgarh, where lawyers are hired on a part-time or contractual basis as protection officers. In Rajasthan, even if protection officers are full-time government officials, they are rarely allowed to devote their complete attention to cases of domestic violence. In many states, existing government officials are assigned with the additional burden of being protection officers. For example in Rajasthan, the Child Development Protection Officer is assigned the additional responsibility of a PO. Other states like, Gujarat, West Bengal, Haryana and Tamil Nadu have appointed independent protection officers, for primarily handling cases of domestic violence, but they too are often burdened with secondary responsibilities.

This process of appointments and functioning of POs poses problems for the aggrieved persons. They face undue delays in the process of filing complaints. At times, just filling and submitting the main application form u/s 12 takes more than 60 days, whereas u/s 12, every application has to be heard within three days from receipt of the application and has to be

disposed of within 60 days. Adv. Audrey D'Mello has stated that some protection officers are themselves not clear about the procedures under the law. "They ask for documents when not needed, and don't interact with necessary stakeholders. The quality of the domestic incident reports is often not good enough." said D'Mello.

## **Conclusion**

Though the intention of this Act was to provide a solution to domestic violence, there have been numerous problems in the implementation of the Act which is a disappointment to many. The major problem being a direct consequence of the failure of the central government to allocate any budget or funds for its enforcement. Some state governments have provided funding for the implementation of the Act, but most have not. There is widespread failure to appoint the 'protection officers' u/s 8, who, according to the Act, are required to receive complaints of domestic violence, prepare the DIR to assess the verity of the cases, and personally assist the victims throughout the legal process. Instead, state governments are assigning these tasks to the existing officials, without relieving them from any of their existing duties.

The provision for NGOs to register as service providers lacks efficient implementation as they lack the resources to provide services as preparing Domestic Incident Report, medical facilities, shelter homes, etc. and there is no provision for reimbursing NGOs. POs who are intended to be the main implementers of the law, are the least accessed law implementers as was concluded in research sample. Lack of resources is one of the foremost reasons for the low number of reporting of cases of domestic violence. One third of the women in India have no access to the internet, hence they cannot report their complaints nor are they aware of the facilities available to them. Ruby. T. T. while discussing the problem of domestic violence in India and the effectiveness of the Act, explains that though the Act is effective, it is not being utilised effectively by the women. Thus it cannot be said that this law is too empowering for Indian women. However, it is definitely a shield in the hands of women to fight against domestic violence and injustice in their own homes.

## **Suggestions**

The present study has highlighted a critical gap in the implementation of the PWDVA in the country. Even though the institutions of Police, Judiciary, Ministry of Women and Child Development are putting their best foot forward to deal with the increasing crimes against women, some gaps have been found that hinder the purpose of effective implementation of the Act. Thus, this study presents certain suggestions/ recommendations that may be supportive to make this Act viable so that justice may prevail. The following are recommendations.

- Section 12 of the Act must make reporting to a Protection Officer mandatory, without providing the option of directly approaching the court. This would act as a filter for cases which lack merit, because the PO would investigate and ascertain the facts of every case.
- Appointment of full-time POs must be enhanced and monitored, with provisions for necessary training. The required funds for the purpose must be set aside for the implementation of the Act.
- Qualifications and cadres of POs must be clearly provided for in the statute.
- Provision of submitting the DIR to the Magistrate must be made mandatory in the statute.



- Provision must be made for proof of claims made under an application u/s 12.
- Provision should be made for penalising false and frivolous cases.
- NGO's and other women empowerment agencies must conduct campaigns to create awareness and guide women about their rights against domestic violence.

## References

- <http://rchiips.org/nfhs/nfhs-4Reports/India.pdf>
- <https://matrimonialadvocates.com/domestic-incident-report-a-legal-view/>
- <https://www.legalserviceindia.com/article/1194-Protection-of-Women-from-Domestic-Violence-Act,-2005.html>
- <https://taxguru.in/corporate-law/domestic-incident-report-dir-fair.html>
- <https://lexspeak.in/2021/01/what-is-the-purpose-of-dir-in-domestic-violence-case/>
- <https://www.casemine.com/judgement/in/627eb23ab50db90fd1943198>
- <https://scroll.in/article/830882/twelve-years-since-the-domestic-violence-act-how-well-do-protection-officers-help-women-in-need>
- <https://www.tandfonline.com/doi/full/10.1080/07329113.2013.774836> The “women's court” in India: an alternative dispute resolution body for women in distress
- [https://www.researchgate.net/profile/Rajni-Sharma-19/publication/354986208\\_2020\\_COMPLETE\\_JOURNAL\\_Univ\\_Teachr\\_Attitude/links/6156d22ca6fae644fbb5def6/2020-COMPLETE-JOURNAL-Univ-Teachr-Attitude.pdf#page=125](https://www.researchgate.net/profile/Rajni-Sharma-19/publication/354986208_2020_COMPLETE_JOURNAL_Univ_Teachr_Attitude/links/6156d22ca6fae644fbb5def6/2020-COMPLETE-JOURNAL-Univ-Teachr-Attitude.pdf#page=125) Ramanathan, V. (2020). EFFICACY OF WOMEN FRIENDLY LEGISLATIONS IN INDIA: AN IN-DEPTH ENQUIRY. Editorial Board, 9(7).
- [https://heinonline.org/hol-cgi-bin/get\\_pdf.cgi?handle=hein.journals/lxfrt2&section=36](https://heinonline.org/hol-cgi-bin/get_pdf.cgi?handle=hein.journals/lxfrt2&section=36) Ruby, T. T. (2020). A Critical Study on the Domestic Violence Faced by Women in Indian Society with Special Reference to Protection of Women from the Domestic Violence Act, 2005. *LexForti Legal J.*, 2, 9.
- [https://www.researchgate.net/profile/Mona-Srivastava/publication/359950156\\_Handbook\\_of\\_Mental\\_Health\\_Issues\\_During\\_COVID19\\_Pandemic\\_Edition\\_1\\_PREFACE\\_PREFACE/links/625837c8a279ec5dd7f63d9d/Handbook-of-Mental-Health-Issues-During-COVID19-Pandemic-Edition-1-PREFACE-PREFACE.pdf#page=29](https://www.researchgate.net/profile/Mona-Srivastava/publication/359950156_Handbook_of_Mental_Health_Issues_During_COVID19_Pandemic_Edition_1_PREFACE_PREFACE/links/625837c8a279ec5dd7f63d9d/Handbook-of-Mental-Health-Issues-During-COVID19-Pandemic-Edition-1-PREFACE-PREFACE.pdf#page=29) Rajon Jaishy, P., & Pandey, A. K. Family Dynamics During Lockdown. *Handbook of Mental Health Issues During COVID19*, 23.
- <https://web.archive.org/web/20180423062655/http://research-chronicler.com/reschro/pdf/v2i4/2425.pdf> Nivedita Ghosh. "The Emerging Marital Trends in Indian Scenario." (2014)
- <https://search.proquest.com/openview/46c4ebe856503ade4fcbb318e68b8233/1?pq-origsite=gscholar&cbl=2026366> Saxena, T. (2015). Indian Protection of Women from Domestic Violence Act: Stumbling or Striving Ahead? (Doctoral dissertation, The Australian National University (Australia)).