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LEGAL ASPECTS OF LIVE-IN RELATIONSHIPS IN INDIA

~ *Ayushi Raj*

ABSTRACT

“When two people choose to live together, does the absence of a marriage certificate mean the absence of legal rights?” The increasing prevalence and recognition of live-in relationships in India have raised important questions regarding their legal status, constitutional protection and the rights of partners and children.

A live-in relationship refers to a situation where two consenting adults choose to live together as a couple without entering into a formal marriage. It is also commonly referred to as cohabitation. In India, living together outside marriage has traditionally been viewed as socially unacceptable and remains a subject of debate. However, changing social values, greater emphasis on individual freedom and privacy and the influence of globalisation have gradually contributed to a more accepting attitude towards such relationships.

For some couples, a live-in relationship provides an opportunity to understand each other and assess compatibility before deciding whether to marry. It is also sometimes viewed as a way of making an informed decision about marriage and potentially avoiding marital conflicts or separation. Despite its increasing presence in Indian society, live-in relationships do not enjoy the same comprehensive legal status as marriage. Nevertheless, Indian courts have gradually recognised certain rights and protections arising from such relationships, particularly in matters concerning women, domestic violence, maintenance and the rights of children.

INTRODUCTION

Marriage has traditionally been regarded as the foundation of family life in Indian society. However, changing social attitudes, greater individual autonomy, urbanisation and increasing exposure to global ideas have gradually introduced alternative forms of companionship. One

such arrangement is the live-in relationship in which two consenting adults choose to live together as partners without formally entering into marriage.

Although live-in relationships have existed in India for some time, they continue to raise important questions about social acceptance and legal recognition. Unlike marriage, which is governed by various personal and statutory laws, there is no single comprehensive legislation in India specifically regulating live-in relationships. Nevertheless, the Indian judiciary has, through a series of decisions acknowledged that adults have the freedom to choose their partners and decide how they wish to live subject to the limits of law.

The legal discussion surrounding live-in relationships extends beyond the relationship between the partners themselves. Questions concerning protection from domestic violence, maintenance, property rights, legitimacy and inheritance rights of children and the right to privacy and personal liberty have increasingly come before Indian courts. The Protection of Women from Domestic Violence Act, 2005 (DV Act), for instance, provides protection in certain relationships that fall within the expression “relationship in the nature of marriage.”

LIVE-IN RELATIONSHIPS AND CENSUS 2027

The Census 2027¹ marks an important development in the official recognition of live-in relationships. According to the Frequently Asked Questions (FAQs) on the official Census website, a couple in a live-in relationship may be treated as a married couple for census purposes if they consider their relationship a “stable union.” The FAQ specifically clarifies that such couples should be counted as married when they themselves regard their relationship as a stable union.

The Registrar General and Census Commissioner, Mritunjay Kumar Narayan, has also emphasised that personal information collected during the Census will remain confidential². The Census will use digital tools, including mobile applications and a self-enumeration portal and respondents will not be required to submit documents during enumeration.

However, this classification is limited to census enumeration and does not, by itself, confer the legal status or rights of marriage under other Indian laws.

¹ Given by Government of India, Census of India, 2027.

² Under Census Act, 1948.

RECOGNITION OF LIVE-IN RELATIONSHIPS UNDER PERSONAL LAWS IN INDIA

Marriage has traditionally held a central position in Indian society and personal laws. Hindu, Muslim, Christian and Parsi laws recognise marriage as an important institution governing family relationships, inheritance and related rights. The emergence of live-in relationships, however, challenges this traditional understanding of family life. Although cohabitation without marriage is increasingly visible in India, it continues to face social and legal concerns. The absence of a specific legal framework for live-in relationships has therefore left several issues to judicial interpretation.

HINDU LAW

In this law, marriage is traditionally regarded as an important social and religious institution. The Hindu Marriage Act, 1955 (HMA) governs marriages between Hindus but does not specifically regulate live-in relationships. Nevertheless, courts have, in certain circumstances recognised long-term cohabitation and drawn a presumption of marriage where a man and woman have lived together as husband and wife for a considerable period.

Thus, while the HMA does not give live-in relationships the same status as marriage, judicial decisions have provided limited recognition and protection in appropriate cases.

MUSLIM LAW

Under Muslim personal law, a valid Nikah is the recognised basis of a marital relationship. Sexual relations outside marriage are traditionally prohibited and are referred to as zina. Consequently, live-in relationships do not receive recognition as marriage under Muslim personal law.

In *Rashida Khatoon v. S.K. Islam*³, the Court observed that a mere promise to marry in the future does not create a valid marriage. Therefore, cohabitation based only on such a promise does not make a woman a legally wedded wife.

Accordingly, live-in relationships remain largely unrecognised under Muslim personal law, particularly in relation to rights that arise specifically from marriage.

³ AIR 2005 ORISSA 56.

CHRISTIAN AND PARSI LAWS

Christian and Parsi personal laws similarly place marriage at the centre of family and matrimonial rights. Their respective marriage laws do not provide a comprehensive framework for recognising live-in relationships. Consequently, partners in such relationships cannot automatically claim the same legal status and rights as married couples.

MAINTENANCE RIGHTS

Maintenance is one of the important areas in which courts have provided protection to women in certain live-in relationships. Earlier, Section 125 of the Code of Criminal Procedure, 1973 provided for maintenance of wives, children and parents. The corresponding provision is now contained in Section 144 of the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS).

In *Chanmuniya v. Virendra Kumar Singh Kushwaha*⁴, the Supreme Court favoured a broad interpretation of the term “wife” and observed that women who have lived with a man as husband and wife for a reasonably long period should not necessarily be denied maintenance merely because strict proof of marriage is unavailable.

The Supreme Court in *D. Velusamy v. D. Patchaiammal*⁵ also laid down conditions for determining whether a relationship qualifies for protection as a relationship in the nature of marriage.

PENAL POSITION OF LIVE-IN RELATIONSHIPS

Some certain acts connected with such relationships could attract criminal liability under the Indian Penal Code (IPC). For instance, Section 494 IPC dealt with marrying again during the lifetime of a husband or wife, where the statutory requirements for the offence were satisfied. Importantly, merely living with another person did not amount to a second marriage. Similarly, Section 498A IPC dealt with cruelty by a husband or his relatives towards a married woman and was therefore not automatically applicable to every live-in relationship. Further, Section 497 IPC, which previously criminalised adultery, was declared unconstitutional by the Supreme Court in *Joseph Shine v. Union of India* (2018)⁶.

⁴ (2011) 1 SCC 141.

⁵ (2010) 10 SCC 469.

⁶ AIR 2018 SC 4898.

- **Section 81 BNS** deals with cohabitation caused by a man deceitfully inducing a woman to believe that they are lawfully married. This provision may become relevant where consent to cohabitation is obtained through deception regarding the existence of a lawful marriage.
- **Section 82 BNS** deals with marrying again during the lifetime of a husband or wife. Thus, the provision concerns a second marriage and should not be confused with merely entering into a live-in relationship.
- **Section 85 BNS** deals with cruelty by a husband or a relative of the husband towards a woman, while **Section 86 BNS** defines cruelty for this purpose.
- **Section 67 BNS** deals with sexual intercourse by a man with his wife when the spouses are living separately, subject to the conditions specified in the provision.

Therefore, the present penal framework does not criminalise live-in relationships as such. Criminal liability arises from particular acts or circumstances surrounding the relationship rather than from the mere decision of two consenting adults to cohabit.

The distinction is important because legal recognition of certain rights in live-in relationships does not mean that such relationships are treated as identical to marriage under every law. The courts have generally attempted to balance individual autonomy with the need to protect persons from deception, cruelty, exploitation and other criminal conduct.

PROTECTION UNDER THE PROTECTION OF WOMEN FROM DOMESTIC VIOLENCE ACT, 2005 (PWDVA)

PWDVA provides an important statutory basis for protecting women in certain live-in relationships. Section 2(f) covers a “relationship in the nature of marriage.” Therefore, a woman need not necessarily be legally married to seek protection under the Act if her relationship satisfies the required conditions.

In *Narayan Jangluji Thool v. Mala Chandan Wani*⁷, the Court considered the scope of Section 2(f) and recognised that a woman in a relationship resembling marriage may seek protection under the Act, subject to the requirements of the law.

HINDU LAW AND MAINTENANCE

⁷ AIR 2015 Bom 36.

The Hindu Adoptions and Maintenance Act, 1956 deals with maintenance rights, including those relating to children. Property rights are also governed by laws such as the Hindu Succession Act, 1956, as amended.

In *Indra Sarma v. V.K.V. Sarma*⁸, the Supreme Court examined the rights of a woman in a long-term live-in relationship and recognised that, in appropriate circumstances, she may seek maintenance after separation particularly where she has been financially dependent on her partner.

MUSLIM LAW AND MAINTENANCE

Since live-in relationships are not recognised as marital relationships under Muslim personal law, a woman in such a relationship does not automatically acquire the rights of a wife, such as dower or maintenance arising from marriage or a corresponding right to inherit her partner's property merely because of the cohabitation.

PROPERTY AND INHERITANCE RIGHTS

Indian law does not provide a comprehensive statutory framework granting automatic property or inheritance rights to partners in live-in relationships. Unlike a legally married spouse, a live-in partner does not automatically inherit the partner's property solely because of the relationship. Such rights may depend on factors such as ownership, succession laws, a will or other legally recognised arrangements.

However, courts have recognised certain presumptions arising from long-term cohabitation. In *Vidyadhari v. Sukhrana Bai*⁹, the Court considered the property rights of parties involved in a long-term relationship and also addressed the rights of a child born from such a relationship.

RIGHTS OF CHILDREN

The legal position concerning children born from live-in relationships has developed through judicial decisions. Under Hindu law, children recognised as legitimate may have rights in the property of their parents in accordance with applicable succession law.

⁸ 2013 (15) SCC 755.

⁹ AIR 2007 SC 2314.

However, the position of the partners themselves is different. A live-in partner does not automatically acquire inheritance rights in the property of the other partner merely because they lived together.

Under Muslim personal law, since the live-in relationship itself is not recognised as a valid marital relationship, the partners do not acquire the inheritance rights that ordinarily arise from a valid marriage.

INTERNATIONAL SCENARIO OF LIVE-IN RELATIONSHIPS

The legal recognition of live-in relationships varies considerably across countries. Some jurisdictions provide specific legal protection to cohabiting couples, particularly in matters of property, maintenance, housing and children while others provide little or no formal recognition. Several countries also allow couples to enter into cohabitation agreements to define their respective rights and obligations.

UNITED STATES OF AMERICA

In the United States, live-in relationships are commonly addressed through cohabitation agreements, which may define the rights and responsibilities of the partners. The term “palimony” is used for financial support claimed by an unmarried partner after a long-term relationship ends.

The concept gained attention in *Marvin v. Marvin*¹⁰, involving actor Lee Marvin and Michelle Triola, who had lived together for several years without marrying. The case contributed to the development of claims for financial support between unmarried partners. However, the law on palimony differs across states with some courts recognising such claims, others rejecting them and some allowing them subject to certain conditions.

In *Taylor v. Fields*¹¹, the California Court of Appeals rejected a claim based on an alleged implied promise of financial support, finding that the relationship did not demonstrate the kind of long-term cohabitation necessary to establish such an obligation.

UNITED KINGDOM

In the UK, cohabiting couples do not generally receive the same legal status as married couples or civil partners. There is no general duty of maintenance between unmarried partners and

¹⁰ 18 Cal.3d 660.

¹¹ (1986) 178 Cal.App.3d 653.

partners do not automatically inherit each other's property unless appropriate arrangements, such as a will, provide otherwise.

However, the law provides protection for children born to unmarried parents. Both parents may have legal responsibilities towards the upbringing and welfare of their children, regardless of whether they are married or cohabiting.

FRANCE

France provides a more structured legal framework for couples who choose to live together without marriage. In 1999, the French National Assembly gave legal recognition to the Pacte Civil de Solidarité (PACS). It allows two adults, whether of the same or opposite sex, to enter into a civil pact and organise their shared life while receiving certain legal and social benefits. The agreement can also be terminated subject to the prescribed legal procedure.

SCOTLAND

Scotland provides statutory recognition to cohabiting couples under the Family Law (Scotland) Act 2006. In determining whether a couple is cohabiting, courts may consider factors such as the length and nature of the relationship and the financial arrangements between the partners.

Where the relationship ends, a partner may apply to the court for certain financial remedies. The Act also provides a surviving cohabitant with a limited opportunity to seek financial provision from the deceased partner's estate where the partner died without a will, subject to statutory conditions.

CANADA

Canada provides legal recognition to certain cohabiting relationships, commonly described as common-law relationships. Cohabiting partners may enter into agreements dealing with matters such as property, financial support and responsibilities towards their children.

Under Ontario's Family Law Act, a cohabitation agreement may set out the rights and obligations of partners during the relationship, upon separation, or on the death of a partner. If the partners subsequently marry, the agreement may operate as a marriage contract, subject to the law.

AUSTRALIA

Australian family law recognises de facto relationships involving both same-sex and opposite-sex couples. A de facto relationship may exist even where one or both individuals have been previously married or have had another relationship, subject to the requirements of Australian law.

PHILIPPINES

The Family Code of the Philippines provides rules concerning property relations between certain couples who live together without a valid marriage. Under Article 147, where a man and woman who are legally capable of marrying live together as husband and wife without marriage, property acquired through their efforts may be subject to rules of co-ownership.

NEPAL

Cohabitation remains legally restricted in Nepal. Despite an increase in couples living together, many reportedly keep such relationships private or present themselves as married due to social and legal concerns.

BANGLADESH

In Bangladesh, cohabitation, particularly after divorce, may face social and informal legal pressure. In some rural areas, disputes involving such relationships may be addressed through the Salish, an informal community-based dispute resolution system.

COMMITTEES AND RECOMMENDATIONS

- The **Justice Malimath Committee**¹² examined the legal position of women living in non-marital relationships and suggested that long-term cohabitation could in certain circumstances, create a presumption of marriage. The Committee also proposed widening the scope of Section 125 of the CrPC to provide maintenance protection to women who had lived with a man as his partner for a significant period. However, the recommendation primarily dealt with situations where the man was already married and therefore had limited relevance to live-in relationships between unmarried couples.
- In **2008, the Maharashtra Government** also proposed giving legal recognition to a woman who had lived with a man for a sufficiently long period. Whether the period of cohabitation was sufficient would depend upon the facts and circumstances of each case.

¹² This report comes in 2003 in India.

- The **National Commission for Women (NCW)**, in its recommendation dated June 30, 2008, supported extending the protection of Section 125 of the CrPC to women in live-in relationships. The objective was to ensure that women in such relationships could seek maintenance and were not left without legal remedies. The proposal also led to discussion about the extent to which the law should protect non-marital relationships without treating them as equivalent to marriage.

RECENT JUDICIAL DEVELOPMENTS

1. In *S.P.S. Balasubramanyam v. Suruttayan*¹³, the Supreme Court had stated, “If a man and lady are living under a similar rooftop and living together for certain years, there will be an assumption under Section 114 of the Evidence Act that they live as a couple and the youngsters destined to them won’t be illegitimate.”
2. In *Revanasiddappa v. Mallikarjun (2023)*¹⁴, the Supreme Court clarified the property rights of children born from void or voidable marriages. The Court held that such children are treated as legitimate under Section 16 of the Hindu Marriage Act, 1955 and are entitled to inherit their parent’s property. Their rights also extend to the share that their parent would have received in Hindu joint family property. However, they do not become coparceners by birth and cannot claim rights in the property of persons other than their parents. The judgment is significant for strengthening the legal protection of children whose parent’s marriage is not legally valid.
3. In *Tulsa v. Durghatiya*¹⁵, the Supreme Court recognised the legal status of children born from a long-term live-in relationship. The Court held that where a couple has lived together as husband and wife for a considerable period, the law may presume the existence of a valid marriage unless the contrary is proved. Accordingly, a child born from such a relationship should not be treated as illegitimate merely because the parents did not have a formally established marriage. The decision reflects the principle that the rights and status of a child should not be adversely affected solely because of the nature of the relationship between the parents.
4. In *Vidyadhari v. Sukhrana Bai* is significant for recognising the succession-related rights of children born from a relationship where the father had a subsisting marriage with another woman. The Supreme Court granted inheritance rights to children born

¹³ (1994) 1 SCC 460.

¹⁴ 2011 AIR SCW 2447.

¹⁵ (2008) 4 SCC 520.

out of a live-in relationship. Although the second woman was not recognised as the legally wedded wife, the Court protected the children's status as legitimate heirs and granted the succession certificate to their mother as the deceased's nominee, subject to the first wife's share.

INHERITANCE RIGHTS OF CHILDREN BORN FROM LIVE-IN RELATIONSHIPS

The question of inheritance rights of children born from non-traditional marital relationships has evolved through judicial interpretation. In *Bharatha Matha v. R. Vijaya Renganathan*¹⁶, the Supreme Court held that a child born from a void or voidable marriage could not claim inheritance in the ancestral or coparcenary property of the parents, but could claim a share in the self-acquired property of the parents.

This approach was subsequently questioned in *Revanasiddappa v. Mallikarjun*. In his 2011 judgment, Justice A.K. Ganguly expressed disagreement with the restrictive interpretation adopted in *Bharatha Matha* and emphasised that a child should not suffer because the relationship between the parents was not recognised by law. The Court stressed the principles of equality, individual dignity and the independent status of the child. It also relied on Article 39(f) of the Constitution, which directs the State to ensure that children receive opportunities and facilities to develop in conditions of freedom and dignity and are protected against exploitation and moral and material abandonment.

The Supreme Court's later decision in *Revanasiddappa v. Mallikarjun* clarified the position further. The Court held that children covered by Section 16 of the Hindu Marriage Act can claim rights in the property of their parents, including the property that becomes the parent's share in ancestral or coparcenary property. However, their rights remain confined to the property of their parents and do not extend to the property of other relatives.

The evidentiary aspect is also relevant. Section 116 of the Bharatiya Sakshya Adhiniyam, 2023, corresponding to Section 112 of the Indian Evidence Act, 1872, creates a presumption of legitimacy where a child is born during the continuance of a valid marriage, subject to the statutory exception concerning non-access. However, this provision primarily concerns

¹⁶ AIR 2010 SC 2685.

legitimacy and proof of paternity, it should not be presented as an independent provision granting inheritance rights to every child born from a live-in relationship.

Therefore, the law has gradually moved towards protecting the rights and dignity of the child independently of the circumstances of the parent's relationship. However, the precise inheritance rights of a child born from a live-in relationship must still be examined in light of the nature of the relationship, the applicability of Section 16 of the Hindu Marriage Act and the nature of the property involved.

PROS & CONS OF LIVE-IN RELATIONSHIPS

Live-in relationships have become more visible in Indian society due to changing social attitudes, individual autonomy and changing perceptions of marriage. While they may provide greater personal freedom, they also raise certain legal and social concerns.

PROS OF LIVE-IN RELATIONSHIPS

1. FREEDOM OF CHOICE AND PERSONAL AUTONOMY

A live-in relationship allows consenting adults to decide how they want to organise their personal and family life without necessarily entering into a formal marriage. The Supreme Court has recognised privacy and decisional autonomy as important aspects of individual liberty under Article 21.

2. OPPORTUNITY TO UNDERSTAND COMPATIBILITY

Living together may allow partners to understand each other's personalities, responsibilities, financial habits and expectations before deciding whether to marry.

3. GREATER FLEXIBILITY

Unlike marriage, a live-in relationship does not necessarily involve formal procedures for entering or ending the relationship. This may provide couples with greater flexibility in making personal decisions.

4. REDUCED SOCIAL AND LEGAL FORMALITIES

Partners may avoid some of the formalities associated with marriage, particularly where they do not wish to enter into a legally recognised marital relationship.

CONS OF LIVE-IN RELATIONSHIP

1. LACK OF A COMPREHENSIVE LEGAL FRAMEWORK

India does not have a single comprehensive legislation governing all aspects of live-in relationships. As a result, questions relating to maintenance, property, inheritance and separation often depend on existing laws and judicial interpretation.

2. UNCERTAINTY REGARDING PROPERTY AND INHERITANCE

Unlike a legally recognised spouse, a live-in partner does not automatically acquire all the property and inheritance rights associated with marriage. The position may depend on the nature of the relationship, the applicable personal law, the nature of the property and the circumstances of the case.

3. VULNERABILITY OF WOMEN

In some relationships, women may face financial or domestic vulnerability after separation. Although certain relationships may fall within the protection of the Domestic Violence Act, 2005, the protection is subject to the requirements of the law.

4. RIGHTS OF A CHILDREN

The status and rights of children born from non-marital relationships have required considerable judicial development. Courts have increasingly focused on protecting the interests, dignity and property rights of children, but the precise legal position can depend on the nature of the parent's relationship and the applicable statute.

5. SOCIAL STIGMA

Despite changing attitudes, live-in relationships may still face social disapproval, particularly in more conservative communities. This can affect the couple's social acceptance and family relationships.

6. POSSIBILITY OF EXPLOITATION OR ABANDONMENT

Where one partner is financially dependent on the other, separation without adequate financial planning may create difficulties. This becomes particularly significant where there is no clear agreement regarding financial responsibilities or property.

CONCLUSION

Live-in relationships represent an important change in the way individuals choose to form personal and family relationships in contemporary India. Although marriage continues to hold a significant position in Indian society and law, the growing acceptance of live-in relationships reflects changing social values, individual autonomy and the constitutional importance of privacy and personal liberty.

The Indian legal system does not presently provide a single comprehensive law governing live-in relationships. Instead, courts have gradually developed legal principles through cases concerning maintenance, domestic violence, property, inheritance and the rights of children. Decisions such as *D. Velusamy v. D. Patchaiammal* and *Indra Sarma v. V.K.V. Sarma* demonstrate that not every live-in relationship receives the same legal protection, the nature and circumstances of the relationship are important in determining the rights available to the parties.

The protection of women and children remains particularly important. Laws such as the Protection of Women from Domestic Violence Act, 2005, along with judicial developments relating to maintenance and children's property rights, show an attempt to prevent individuals from being left without legal protection merely because their relationship does not take the form of marriage.

At the same time, uncertainty remains regarding inheritance, property rights, maintenance and the legal status of partners. Therefore, there is a need for greater clarity and consistency in the law while respecting the freedom of consenting adults. The objective should not necessarily be to treat live-in relationships as identical to marriage, but to ensure that individual autonomy is balanced with protection against exploitation and the rights and dignity of women and children.

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