
INTERPRETATION OF STATUTES AND DEVOLUTION OF PROPERTY: A LEGAL ANALYSIS OF THE HINDU SUCCESSION ACT, 1956

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ABSTRACT:

In India, statutes governing individuals on matters of personal law (marriage, divorce, inheritance, adoption) differ as per the religion of the individual. The provisions of the HSA discriminate against Hindu women by prescribing different rules for devolution of property held by men and women. This research paper explores the interpretation of statutes and its implications on society and individuals, also with a focus on people with disabilities. Through research methods involving both doctrinal and non-doctrinal, in the beginning the study delves into how individuals understand and interpret laws and their perceived impact on society. This paper also analyses on the gender discrimination and legal provisions, particularly Hindu Succession Act, 1956. The paper concludes with observations on the results of the survey and experiential consequences and provides a perspective on these law's interpretations and their influence on gender discrimination in property distribution under the Hindu Succession Act of 1956

KEYWORDS: Hindu Succession Act 1956, Interpretation of Statutes, Succession, Intestate, Indian Succession Act, Gender Discrimination, Devolution of Property

WHAT IS INTERPRETATION OF STATUTES?

We all know that words spoken or written are a medium of communication. When a word or phrase has a one-definition, there is no problem. If, however, the potential meaning of any word is ambiguous then problematic consequences arise which require court clarification of the true meaning of the word. When two people are talking to one another and are in the same room they can discuss and clarify any misunderstandings. But what about when a statute is ambiguous?

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In my view, "How judges look at the words of a rule or principle is interpretation," so when a court has difficult words to interpret, that is interpretation as a word. This word has been originated from the Latin word 'interpretari' i.e to explain, expound, understand or translate. Interpretation is the process through which we explain, expound and translate any text or anything written. Interpretation is the process through which a court determines the true meaning of a law by giving the words of the law their natural and ordinary meaning. It is the exercise of ascertaining the real meaning of the words in a statute. This court is not at liberty to construe if so it pleases; and indeed, from continued practice these rules have come to be observed. These are described as "rules of construction" or "principles of interpretation." court applies any of the rules which would result in a product of our sense of justice in the present case.

IMPORTANCE OF INTERPRETATION:

The purpose of interpretation of enactment is to unleash the cinches put by the Legislature. For similar unlocking, keys are to be set up out. These keys may be nominated as aids for interpretation and principles of interpretation. The aids for interpretation may be divided into two orders, namely, Internal and External aids for interpretation².

In simpler terms, **interpretation of enactments** refers to the judicial process through which courts ascertain and apply the meaning of statutory provisions³. Some quantum of interpretation is frequently necessary when a case involves a enactment. occasionally the words of a enactment have a plain and straightforward meaning. But in numerous cases, there's some nebulosity or vagueness in the words of the enactment that must be resolved by the judge. To interpret and interpret enactment, judicial principles are applied. Courts have to be called upon the interpret document all the time but the purpose to which the interpretation of bills serves is to see that courts are suitable to do justice

Therefore, we see that the nebulosity or query can arise in language due to the limitations of the English language when the words are to be used in common sense. It's possible for one word to have different meanings now to understand the meaning of the word which will help in arriving at the due decision the introductory principles of interpretation is used. The actuality of homonyms,

² Vepa P. Sarathi, *Interpretation of Statutes* 4–6 (5th ed. 2010)

³ *K.P. Varghese v. Income Tax Officer*, (1981) 4 S.C.C. 173, 180 (India) ("The task of interpretation is to ascertain the legislative intent.").

homographs, homophones etc. further add to the nebulosity that may be caused in flexible operation of the language. Actuality of similar nebulosity is common in language, still, when there's nebulosity in the bills thereby precluding the understanding of the law in its due sense, it rings an alarm, as it lift to the latitude of capsizing the opinions of the courts in cases of pivotal matters, or impact the route of picture of justice in such a manner that may affect in illegal, unjust and unreasonable opinions by the court. And it's needed to exclude similar nebulosity from the arena of law. therefore, the operation of introductory principles of interpretation by the judges in interpreting the words of the bills that was intended by the lawmakers⁴; Golden and Mischief Rule of Interpretation helps in earning due decision timber.

INTRODUCTION -

HINDU SUCCESSION ACT, 1956⁵:

The Hindu Succession Act was passed by the Indian Parliament in 1956. It is a codal law relating to property succession and inheritance on a national level. It was prepared to replace a number of norms and traditions which heretofore regulated the intestate succession of property in India prior to the passing of this act. It is an Act to amend, codify and secularise the law of intestate or unwilled succession among Buddhists, Hindus, Jains, and Sikhs

“The egalitarian bluestocking that the Hindu society may have become, in consonance with the constitutional mandate, it has still left untouched perhaps the last discriminatory corner of the Hindu Society which has otherwise come of age and which would have to be looked upon as wanting in an equal society.”⁶

DEVOLUTION OF PROPERTY UNDER THE HINDU SUCCESSION ACT, 1956:

The HSA legislates different schemes for the devolution of intestacy of property in men and women who die intestate. Property inheritance in male intestates is regulated by Sections 8⁷ and 9⁸, along with the Schedule of the HSA. Section 8 contains the principles that govern the inheritance

⁴ *Heydon's Case*, (1584) 3 Co. Rep. 7a, 76 Eng. Rep. 637 (Eng.) (origin of Mischief Rule); see also *Union of India v. Sankalchand Himatlal Sheth*, A.I.R. 1977 S.C. 2328 (India).

⁵ The Hindu Succession Act, No. 30 of 1956, INDIA CODE (1956), <https://www.indiacode.nic.in/handle/123456789/1713> (last visited June 1, 2025)

⁶ *Mamta Dinesh Vakil v. Bansi S. Wadhwa*, MANU/MH/1869/2012 (Bom. HC 2012) (India).

⁷ The Hindu Succession Act, No. 30 of 1956, § 8, INDIA CODE, <https://shorturl.at/qfmRs>

⁸ Id. § 9; see also id. sch. (providing Class I and Class II heirs with structured hierarchy).

of property. The Schedule contains the various classes of heirs. Section 9 is complementary to Section 8, outlining priority rules between successors in the categories outlined, as well as hierarchy between successors from various subcategories within a category. It also covers higher-priority successors taking the property from lower-priority successors. Devolution of property in female intestates is covered under Sections 15 and 16 of the HSA. Section 15(1)⁹ outlines the general scheme of devolution. Section 15(2)¹⁰ excludes in the case of property bequeathed to a female intestate individually. Section 16¹¹ is a legislative provision to Section 15, whereby relatives of a higher degree may inherit property at the expense of the one of an inferior degree. Our analysis of gender discrimination within the HSA will be limited to Sections 8 and 15, as these two sections represent the heart of the succession rules and where gender discrimination is found. Sections 9 and 16 are not addressed because they are facilitatory provisions and have no gender-discriminatory rules.

Explanation:

According to the devolution schemes under Section 8 and 15, successors of one class completely dispossess successors of other classes. When, for example, a man dies intestate and his Class I successors (his children, for example) are surviving, no Class II successors (brothers and sisters of the intestate, for example) can inherit anything. In the same manner, if a woman dies intestate but leaves behind children, her husband's heirs as well as her parents cannot lay claim to her property. For men, the devolution system under Section 8 applies to all the properties they own. For women, however, the devolution system under Section 15(1) applies to all the properties inherited from her husband, his relatives, or any origin family. But when a woman acquires property from her parents and has no issue, it is covered by Section 15(2). Section 15(1) also controls property which she owns alone by way of gifts, wills, or purchases. Therefore, all the woman's "self-acquired" property comes under Section 15(1).

RESEARCH METHODOLOGY:

This research study examines interpretation of law and gender-based discrimination in devolution of property under the Hindu Succession Act, 1956 (HSA). The research employs both qualitative

⁹ Id. § 15(1) (laying down the general rules for succession of Hindu female intestates).

¹⁰ Id. § 15(2) (creating exceptions for property inherited from the husband or father).

¹¹ Id. § 16 (providing rules for order of succession among heirs listed in § 15).

and quantitative approaches to research in order to examine the attitudes of different groups, such as law students, law faculties, practicing lawyers, individuals engaged in legal and other professional jobs, unemployed people, and homemakers. The aim of this qualitative study is to explore the complex dynamics between gender and the legal system, focusing on the transmission of property. Using exploratory and descriptive research techniques and qualitative methodologies, the research aims to foster rich explanations of people's experiences, understandings, and relationships with the interpretation of the law and gender discrimination in the legal system.

The primary means of data collection is a mixture of an online survey constructed on Google Forms and a face-to-face interview. The survey is structured to gain in-depth answers that offer insights into gendered experiences, conceptions of fairness, and interactions with the law. Co-operations between Law School Under Graduate and Post graduate Students, Advocates, Law Faculties, PHD Scholars, Individuals working in Legal Fields, and Other Fields supported with the full understanding of the issues involved and in order to collect information about them. The essay concludes by analyzing responses to questionnaires and other methods that could be pursued and authenticated, providing data on interpretation of statutes, gender-based discrimination, and devolution of property in terms of the Hindu Succession Act, 1956.

RESPONSES OF THE PARTICIPANTS – ANALYSIS

Through the analysis of the survey conducted, in the event of questions regarding interpretation of statutes, The response of the participants confirms the subtle realization of the applicability and complexity of the interpretation of law, especially concerning gender equality and right of inheritance under the Hindu Succession Act (HSA) of 1956.

Participants have emphasized certain parameters of interpreting statutes such as creating a notion of the legislative intent, analysis of context and language, and taking into account social norms and values. These are sharp arguments that reveal the complex features of legal interpretation, extending past textual analysis to include general principles of justice and fairness. 71.4% of Participants concurred with the necessity of interpreting law to achieve justice, appropriate enforcement, and realizing legal rights in daily life.

This perception highlights the inherent value of legal interpretation towards the protection of rule of law and human rights. 82.1% of the Respondents expressed strong agreement that interpretation

of laws does make a difference in daily life, impacting social behavior, judicial rulings, and consequences. This perception highlights the broad impact of legal norms and the necessity of fair interpretation towards increasing greater equity and inclusion across societal spheres. In the manner of how differently-abled individuals perceive, The interviewees depicted how people look at things based on their ability.

For example, mobility in congested areas or enjoyment of recreational time can be imagined differently depending on abilities. As people with disabilities experience shared scenarios differently, so they are also able to perceive legal frameworks in a distinct way. To that degree, Understanding and responding to the varied needs of people with disabilities are necessary while interpreting legislation in a sensitive and inclusive manner. While understanding such disparity, judicial interpretation can attempt to grant equal access to justice and rights to everyone, thus ensuring equality and inclusivity in the legal system. Research on the reaction garnered by the survey respondents to the Hindu Succession Act, 1956 (HSA) indicated a shocking prevalence of indefiniteness and vagueness in its interpretation, though more specifically in the area of gender discrimination.

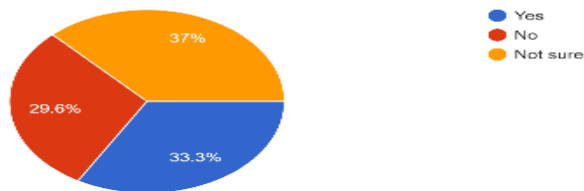
Most of the respondents displayed confusion as to whether there were discriminatory provisions in the HSA, reflecting a failure to critically analyze and comprehend what the impact of the statute is in terms of gender equality. Scrutiny of their responses revealed that some of the participants were applying the HSA provisions automatically without questioning or interpretation, and with limited comprehension of the wording of questions. Despite some participants showing awareness of the HSA, some of the responses conflicted with the option these respondents had identified as most suitable, noting the nuance and ambiguity in interpreting the Act. These results illustrate the necessity of a more multifaceted understanding and interpretation of the HSA, particularly of its gender-specific provisions, to promote equality and justice in its application.

Explicit instruction and education regarding the provisions of the Act, as well as initiatives towards generation of gender equality principles awareness, are necessary to resolve the inconsistencies and ambiguities seen in the responses of the participants. Legal literacy training and classes could also contribute to greater public awareness of inheritance laws and allow people to perform effectively in terms of rights.

Survey Results: Pie Diagrams

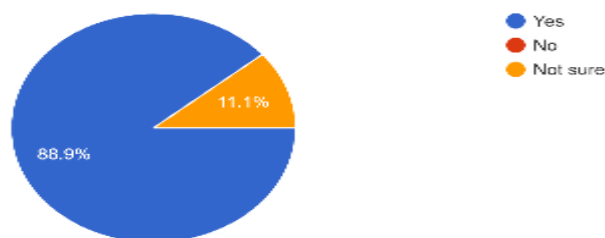
6. Do you believe the Hindu Succession Act, 1956 shows discrimination or inequality based on gender?

27 responses



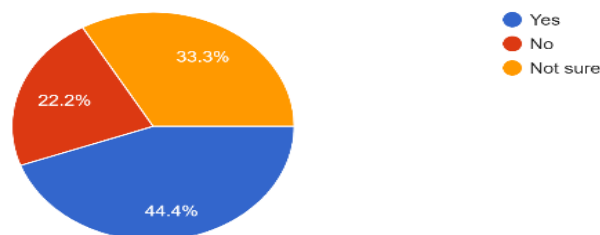
8. Are you aware of the Provision Section 8 and Section 15 of the HSA, 1956 which mentions about General rules of succession in the case of male and...ecified therein, but upon the heirs of the husband)

27 responses



9. Do you think the distinction under section 8 and section 15 of HSA discriminate based on maintenance of family ties?

27 responses



ANALYSIS OF GENDER DISCRIMINATION IN DEVOLUTION OF PROPERTY UNDER HINDU SUCCESSION ACT, 1956.

In the system of devolution of property of a woman, the heirs of the husband (his natal family as well as their wives and children rank above the parents and brother and sisters of the woman. In Section 8, none of the relatives of the woman are included in the system of devolution of property of a man. Further, the list of heirs of the husband is so complete that practically the parents and brothers of a woman would have hardly a right to inherit anything from her. We cannot discover any such similar provision in Section 8 and 9 of the Act. In respect of any such property which

might be held by a man, his natal family of the wife is never a right to inherit it. The property only devolves on his heirs, as provided in the Schedule, including his remote relatives and their wives. This non-reciprocal provision is prima facie discriminatory.¹²

The rules of devolution of women in Section 15(1) are to be construed in all circumstances except in the case of exceptions in Section 15(2). They are the property in respect of which acquired by the woman by gift, or by her skill and effort. Hence, although the woman may take over the subject property by, say, purchasing it with her own savings, the heirs of the husband are placed higher in the order of devolution of such property than her parents and siblings. That is, the husband's natal relatives (and their husbands/wives) — even very remote ones — come before even the wife's most intensely natal relatives, in the event that she passes away without having children. Even if the woman's natal relatives are to inherit from her, the son/daughter of her father takes precedence over the heirs of her mother. This implies even distant relatives of her paternal side are above the nearest relatives of her maternal side. This was a discriminatory practice owing to the acquisition and holding of property in India during the period this law was penned.¹³

LANDMARK CASE-LAWS ON SECTIONS 8 AND 15 OF HAS

Three main arguments against discrimination under the Hindu Succession Act (HSA) are: (1) discrimination is against Article 15(1) constitutional rights¹⁴, (2) discrimination creates unequal and undesired effects, and (3) discrimination is contrary to India's international obligations. The argument of gender discrimination on the grounds of unconstitutionality has been raised in two leading cases: **Mamta Dinesh Vakil v. Bansi S. Wadhwa**¹⁵ and **Sonubhai Yeshwant Jadhav v. Bala Govinda Yadav**¹⁶. These two cases have been decided by single judge benches and are competing cases. Even though the question of constitutionality of gender discrimination remains pending, arguments against its constitutionality are far more powerful than arguments against its unconstitutionality. The differential treatment of the genders resulting in unequal outcomes has

¹² Archana Parashar, *Women and Family Law Reform in India: Uniform Civil Code and Gender Equality* 96–97 (1992).

¹³ Flavia Agnes, *Law and Gender Inequality: The Politics of Women's Rights in India* 145–146 (2001) (discussing historical basis of gender discrimination in inheritance laws).

¹⁴ INDIA CONST. art. 15, cl. 1 (“The State shall not discriminate against any citizen on grounds only of religion, race, caste, sex, place of birth or any of them.”)

¹⁵ *Mamta Dinesh Vakil v. Bansi S. Wadhwa*, MANU/MH/1869/2012 (Bom. HC 2012) (India).

¹⁶ *Sonubhai Yeshwant Jadhav v. Bala Govinda Yadav*, A.I.R. 1983 Bom. 156 (India)

been evident in numerous cases, one being the milestone case — **Om Prakash v. Radhacharan**¹⁷. The aforementioned case is a proper example of the potential negative consequences which emerge from the provisions presently available under Sections 8 and 15 of the HSA, where the property had been transferred based on financial help given by the lady's parents. The matrimonial family made no contribution towards the acquisition of the property. The property can thus plausibly be inferred to have been inherited from the parents, and would have passed on to the natal family in the event of the death of the woman. Priority given to the husband's relatives who have no interest in the property over the natal family goes against the assumptions on which the different models of distribution of property are justified. In **Kamal Anant Khopkar v Union of India**¹⁸, the petitioner challenging the provisions of the Act dealing with the law of succession raises serious concerns about gender equality in Hindu succession laws.

The petitioner's argument is centred on the prejudiced content of Sections 15 and 16 of the Act that perpetuate patriarchal inclinations by limiting a Hindu woman's free will in dealing with her properties between her blood relations. This petition well highlights the fact that such provisions not only humiliate women but also withhold them from social and economic interactions in India, the largest democracy in the world. That the Supreme Court bench recognized the significance of the subject matter of gender equality in the petition is commendable. The Court, through its demand for the central government's response, reflects its willingness to address issues concerning systemic inequities in the legal framework. But the 1956 Act's elucidation by the central government on the basis of precedent and previous Supreme Court judgments emphasizes the challenges of reforming entrenched legislation that perpetuates gender discrimination. The government stand, on the basis of precedent and on the principle that legislation could not be interpreted on emotional or sympathetic considerations, reflects reluctance to reform the Act, even based on recommendation by institutions like the Law Commission¹⁹ and the National Commission for Women²⁰. The argument that the contribution of each state and Union territory would need to be made before deliberation for amendments merely slows the process even more

¹⁷ *Om Prakash v. Radhacharan*, (2009) 15 S.C.C. 66 (India).

¹⁸ *Kamal Anant Khopkar v. Union of India*, Writ Petition (Civ.) No. 1517 of 2018, Diary No. 47808 of 2018 (India).

¹⁹ Law Comm'n of India, *Report No. 207: Succession and Inheritance*, ¶¶ 2.1–2.4 (2008)

²⁰ Nat'l Comm'n for Women, *Recommendations on Amendments to the Hindu Succession Act*, (2001)

towards eliminating gender imbalances in inheritance laws. My understanding is that the law has to develop with and when the social context transforms, particularly on issues of gender equality.

A more complex approach that adapts to socio-economic realities and transcends historical biases could be propagated. The reluctance of the Court to hear amendments of the Act, even on the recommendation of professionals such as the Law Commission and the National Commission for Women, points towards a conservative mindset which is hindering the process towards gender equality. Finally, interpretation and determination of judicial decisions involve complex legal, social, and ethical complications. This bureaucratic issue makes the task of drafting legislative amendments for gender equality difficult. Overall, even as the legal war continues, the case is a reminder of the struggle for gender justice that continues in India's judicial system.

GENDER EQUALITY WITHIN OTHER INDIAN SUCCESSION LAWS

There is enough evidence to hold the Hindu Succession Act (HSA) not only grossly unfair but even unconstitutional and violative of India's international commitments, as one of the basic conditions of the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)²¹ is to do away with discrimination in property rights based on gender. Two of the other Indian acts have more gender-balanced models of inheritance than Sections 8 and 15 of the HSA. An example includes the Goa Succession, Special Notaries and Inventory Proceeding Act, 2012 (GSSNIP)²², which is based on the provisions of the Portuguese Civil Code and contains a more balanced model of devolution. The second one is the Indian Succession Act (ISA), which applies to all Indian citizens who are neither Hindu, Buddhist, Jain, Sikh, nor Muslim. Conversely, intestate succession of Hindu, Buddhist, Jain, and Sikh communities is addressed by the HSA, whereas Muslims are governed by customary laws via the Muslim Personal Law (Shariat) Application Act of 1937²³. Older by age than the HSA, nonetheless, the model of devolution found under the ISA is far more progressive from a gender equality perspective. The Bombay High Court supports this inference in the **Mamta Dinesh Vakil v. Bansi S. Wadhwa**²⁴.

²¹ Convention on the Elimination of All Forms of Discrimination Against Women, Dec. 18, 1979, 1249 U.N.T.S. 13; India ratified CEDAW on July 9, 1993.

²² The Goa Succession, Special Notaries and Inventory Proceeding Act, No. 27 of 2012 (India).

²³ The Muslim Personal Law (Shariat) Application Act, No. 26 of 1937, § 2, INDIA CODE, <https://www.indiacode.nic.in/handle/123456789/2303>

²⁴ *Mamta Dinesh Vakil v. Bansi S. Wadhwa*, MANU/MH/1869/2012 (Bom. HC 2012) (India).

PRIOR ATTEMPTS AT REFORM ²⁵

Though breach of Article 15(1) of the Constitution, adverse effects on women, and violations of international covenants are sound grounds why the devolution schemes of the HSA must be reformed, there is one more sound reason why the reforms should be sought. The economic condition of women has made a sea change since the HSA was drafted. Thus, assumptions about women's property ownership and that they can or cannot own property are medieval in the contemporary context. Gender discrimination in the HSA has not gone unnoticed to the Indian government since long.

Different stakeholders in the Indian state have already come up with differential solutions to address the challenge of uneven devolution of property under the HSA, but these responses to reforms have been patchy. The provisions of devolution of property in the event of men and women under Sections 8 and 15 are discriminatory against women. The aforesaid provisions were held to be ultra vires Article 15 of the Constitution by the Bombay High Court in the case of **Mamta Dinesh Vakil v. Bansi S. Wadhwa**; however, a final ruling on the same is still pending. We have also advanced arguments in favor of the argument that legislative means must be the preferred means to achieve reforms. Constitutional courts, Law Commission of India reports, and the aims of two private members' bills have demonstrated the discriminatory and unequal character of the devolution schemes against women. However, none of these forums have provided a satisfactory response to this question. The 174th Report of the LCI mentions the goal to be achieved, i.e., "gender-neutral legislation," but does not design a framework, strategy, and vocabulary required for making the HSA gender neutral. The National Commission for Women estimates the making of a gender-neutral legislative draft, but its recommendations still show some lacunae. The private member bills introduced by Anurag Singh Thakur in 2013 and Dushyant Chautala in 2015 attempted to bridge gender discrimination under inheritance plans under the Hindu Succession Act (HSA)²⁶. The bills aimed to introduce a change in law for equal succession in favor of an intestate woman Hindu's parents on an equal footing with her husband.

²⁵ **Devendra Damle et al.**, *Gender Discrimination in Devolution of Property Under Hindu Succession Act, 1956*, No. 305, NAT'L INST. PUB. FIN. & POL'Y (May 25, 2020) <https://shorturl.at/dpegm>

²⁶ See Lok Sabha Bill No. 55 of 2013 (Anurag Singh Thakur, M.P.) (Hindu Succession (Amendment) Bill, 2013); Lok Sabha Bill No. 152 of 2015 (Dushyant Chautala, M.P.) (Hindu Succession (Amendment) Bill, 2015).

The reality that these bills never stayed on the discussion table in either House of Parliament and subsequently lapsed with the end of their respective terms in Lok Sabha is questionable regarding political dedication and priority accorded to gender equality in legislative affairs. This failure to debate and enact these bills amounts to a lost opportunity in reforming gender biases in inheritance laws and strengthening equal rights for women in the Hindu community. It also represents the difficulties and setbacks involved in enacting legislative reform aimed at addressing gender inequalities in India. Furthermore, the recurring pattern of identical bills proposed by various parliamentarians over the years attests to the persistence of gender discrimination in inheritance law and the continued attempts by some members of Congress to change this cause. But the failure to credibly promote their passage also reflects more generally on more profound systemic barriers in the legislative process and on the urgency for additional mobilization and advocacy for gender equality reforms.

FURTHER APPROACHES TO REFORM:

An integrated policy for the purpose of guaranteeing protection of rights of every person, regardless of gender, and guaranteeing property distribution made in an equitable and just manner. For the achievement of this goal,

1. The intestate system of male and female intestates shall be the same.
2. The man's and woman's natal family shall be given equal treatment.
3. Male and female relatives of the intestate shall be given equal treatment.
4. Intestate property generally should be treated equally; only relation to the intestate should entitle.
5. Male and female lines alike should be admitted on equal terms.
6. The only test that needs to separate different classes of heirs should be one of remoteness from the intestate.

In addition to these guiding principles, the reforms themselves must be gender neutralised by means of minimally intrusive amendments.

CONCLUSION

To avoid any such future occurrences like the one which took place in Omprakash case, I recommend a different plan for inheritance of property under Section 15. Section 15 of the Act shall be amended so that Section 15 is aligned with Section 8, the only difference being the gender of the intestate instead of the order or position of inheritance. Alternatively, Section 15 can be amended whereby pursuant to Section 15(1), the wife's father, husband's mother, and Class I heirs are divided the property equally under Entry 2, followed by the rest of the husband's heirs (which fall under Section 8 as Class II heirs, agnates, and cognates). Additionally, under Section 15(2)(a), as quoted from the source, the parents' heirs would inherit the woman intestate's property. The same would apply under the doctrine of reversion. Having accorded Hindu women full ownership of property as recently as 1956 alone, it is their utmost requirement on the part of the legislature and judiciary alike to intervene at the earliest so that there is fairness in the partition of the female intestate's property as well.

LEARNING OUTCOME AND EXPERIENCES GAINED

In the course of this study, I had explored the complex interface of gender and law, namely in the context of property inheritance. Through a mix of quantitative and qualitative methods of research, I was able to compare the perspectives of different groups of individuals, including law students, practicing lawyers, and those who are working in the legal as well as other professions.

One of the most significant findings of this study was the sophisticated idea of legal interpretation. I understood that legal interpretation is not just textual analysis but includes more general principles of justice and fairness. It was fascinating to observe how the participants highlighted different aspects of interpreting statutes, ranging from feeling the intent of legislation, interpreting language and context, and taking into account public norms and values. Further, comparison of survey responses evoked evident gender differences among inheritance law, particularly in the treatment of Hindu women under the Hindu Succession Act, 1956.

It laid down the importance of introducing legal reforms to mend gender discrimination and enact gender equality in inheritance laws. It has proven to be a life-changing experience for me to conduct this research. Apart from broadening my horizon about legal interpretation and gender discrimination under inheritance laws, it has also enabled me to join the cause of gender justice and social equality in Indian society.

