

***BEYOND LEGISLATION: EVALUATING THE EFFICACY OF THE PWDVA, 2005
IN SAFEGUARDING WOMEN'S RIGHTS AND ADVANCING GENDER JUSTICE***

I. Abstract

The **Protection of Women from Domestic Violence Act, 2005 (PWDVA)** played a pivotal step in India's legislative response in an attempt to confront domestic abuse more comprehensively. By broadening the definition of violence to include emotional, sexual, and financial abuse and not only physical harm. This paper serves as a tool to take a closer look at how effectively the Act has functioned in practice, examining the law's core provisions, how courts have interpreted them, and how enforcement has fared across different contexts pragmatically. It further explores the intersection of the Act with existing legal frameworks such as **Section 498A IPC** and the **Hindu Succession Act**, while advocating for reforms to address modern challenges like digital abuse. Extended protection is given to the marginalized groups, including elderly women and transgender persons with special attention. Drawing on international instruments like **CEDAW** and the **Istanbul Convention**, this study argues that while the Act was groundbreaking, its long-term impact will depend on sustained institutional reform and a broader shift in societal attitudes toward domestic violence. Ultimately, it asserts that the transformative potential of the **PWDVA** remains contingent on systemic reforms, judicial sensitivity, and a cultural shift toward zero tolerance for domestic abuse.

II. Keywords

Domestic Violence; PWDVA, 2005; Gender Justice; Legal Reform, and; Intersectional Feminism

III. Introduction & Importance

The **Protection of Women from Domestic Violence Act, 2005 (PWDVA)**¹ is an exemplary legislation aimed at addressing domestic violence in India. Domestic violence was a matter of privacy prior to the **PWDVA**, keeping women devoid of legal protection. The **PWDVA** formalized domestic violence within the ambit of the law as part of the legal arena, giving women the much-sought protection, care, and justice.

¹ The Protection of Women from Domestic Violence Act, No. 43 of 2005, India Code (2005).

The **PWDVA** particularly defines domestic violence and encompasses physical, emotional, sexual, and economic abuse. It not just provides protection to married women but also to live-in partners, expanding its ambit. Key provisions are orders of protection (**Section 18**) against the perpetrators, residence orders (**Section 19**) so that the victims may still reside in their own home, and economic relief (**Section 20**) for medical costs and compensation for distress. Shelters and legal assistance are also made compulsory under the act, contributing to the safety and dignity of women.²

Section 3 categorically defines domestic violence, and in doing so, the offence has also evolved as a future-based legal tool. Judicial orders have also supported its imposition. **Vishal Jeet v. UOI**³ served as the premise to recognize domestic violence in law. **Shyamlal Devda v. Parimala**⁴ addressed relief to victims, and **State of Punjab v. Gurmit Singh**⁵ addressed the requirement for efficient legal protection.

The **PWDVA** is critical in empowering women, de-normalizing the social norms applied to justify violence, and promoting gender equality. Through judicial redress, it offers an escape route for women from violence and restoration of women's rights. The act is a critical part of India's continuous struggle against violence within the household and the protection of human rights for women.

PWDVA has impacted many stakeholders considerably. It gave the woman victims legal remedy and protection tool, relief, and justice. Province and location enforceability remains arbitrary with many women stigmatized in their locations and dissuaded from taking cases to court.⁶

To the judiciary and police, the Act added sensitivity and training to deal with domestic violence cases, with continued challenges to enforcement. NGOs and aid agencies have also contributed significantly to bridging gaps by offering shelter, counselling, and legal-aid, complementing the

² The Protection of Women from Domestic Violence Act, No. 43 of 2005, §§ 3, 18, 19, & 20, India Code (2005).

³ Vishal Jeet v. Union of India, A.I.R. 1990 S.C. 1412 (India).

⁴ Shyamlal Devda v. Parimala, (2020) 10 S.C.C. 200 (India).

⁵ State of Punjab v. Gurmit Singh, A.I.R. 1996 S.C. 1393 (India).

⁶ Aparna; Nataraj Slavov, Sita Mathur. Role of Legislative Change in Reducing Domestic Violence against Women in India (May 2016).

impact of the law. Success of the law in the long-term will rely on continued enforcement and elimination of social barriers to access to justice.

IV. Analysis of Key Provisions of the PWDVA, 2005

The **PWDVA** is the most significant development in Indian law to combat the issue of domestic violence. The Act is an endeavour towards relief to women being subjected to domestic violence, an age-old evil afflicting society. The provisions cover a wide range of legal relief and this analysis elaborates on the key provisions of the Act, listing their importance, legal interpretation, and leading cases that have determined its interpretation.⁷

1. Definition of Domestic Violence (Section 3)

The most elementary of the **PWDVA** is the definition of domestic violence. Section 3 provides a broad definition of "domestic violence," not just physical abuse, but also emotional, sexual, and economic abuse. The inclusion of these abuses was an essential step towards rectifying the entirety of domestic violence, much of which goes unnoticed and unreported, especially emotional and economic abuse.

- **Physical violence:** Any physical activity that brings about physical injuries, harm, or damage to the health of the woman.
- **Sexual violence:** Any sexual coercion or assault in the domestic setting.
- **Emotional and psychological abuse:** Any behaviour that leads to emotional trauma, mental distress, or undermines the self-esteem of a woman.
- **Economic violence:** Withholding money. or financial control, which makes the victim economically dependent on the perpetrator.

In the case of **Krishna Bhattacharjee v. Sarathi Choudhury**⁸, the Delhi HC especially focused on the Act considering economic abuse and mental distress as forms of domestic violence. This case broadened the definition of domestic violence and ensured that the area of the Act is not solely physical abuse.

⁷ Vihan, Renu. "THE PROTECTION OF WOMEN FROM DOMESTIC VIOLENCE IN INDIA: IN CONTEXT OF DOMESTIC VIOLENCE ACT 2005." The Indian Journal of Political Science, vol. 74, no. 1, 2013, pp. 49–60.

⁸ Krishna Bhattacharjee v. Sarathi Choudhury, (2016) 2 S.C.C. 705 (India).

2. Protection Orders (Section 18)

Section 18, the most significant provision under the **PWDVA**, provides the victim with the right to seek a protection order. A protection order is a court remedy that restrains the abuser from causing violence to the woman once again. The protection order is intended to provide the woman with immediate relief and prohibit the abuser from harassing her in any form.

The law also gives the woman the authority to seek an injunction against the abuser, restraining him from any form of violence, including physical, emotional, and sexual violence. The importance of the protection order is that it has the ability to provide immediate relief to women, giving them space and time to pursue other legal options such as requesting divorce, custody, or a residence order.

In **Indra Sarma v. V.K.V. Sarma**⁹, the Supreme Court dealt with the prevalence of domestic violence in live-in relationships. The Court held that provisions of the **PWDVA** had to extend to women who resided in live-in relationships as well, a progressive interpretation of the law.

3. Residence Orders (Section 19)

Residence orders provide for a woman who is subjected to domestic violence not to lose a home or shelter. The provision applies especially when a woman is physically thrown out of the house by her abuser, or if the abuser tries to take over control of the residence. The Act allows the wronged woman to apply for a residence order, which disallows the abuser from evicting her from the shared home.

The law also allows the woman to remain in the common household even when the property is in the possession of the abuser. Where the woman cannot remain in the common household due to the presence of the abuser, the court can, in its discretion, allow her the right to reside in an alternate house with payment of maintenance.¹⁰

⁹ *Indra Sarma v. V.K.V. Sarma*, (2013) 15 S.C.C. 755 (India).

¹⁰ Karp, Aaron, et al. *Unheard and Uncounted: Violence against Women in India*. Small Arms Survey, 2015.

In the case of **Rajesh Sharma v. State of UP**¹¹, the Supreme Court mentioned misuse of the **PWDVA** by some women, such as relocation orders without reasonable grounds. However, the Court had put into place that the law was enacted to provide protection for women's right to the house and their security, once again affirming residence orders as a fundamental order for the relief of victims of domestic violence.

4. Monetary Relief (Section 20)

The second-most important provision of the **PWDVA** makes available monetary relief to the woman through the court. The provision aims to relieve the victim of the economic constraint and provide her with access to monies to live in the short term, along with counsel fees.

Besides, the Act entitles payment of maintenance to the woman and victims of violence in consequence of violence. The husband can be ordered by the court to pay the wife for her maintenance and support at reasonable rates.

In **Juveria Abdul Majid Patni v. Atif Iqbal Mansoori**¹², the court gave specific emphasis on financial relief under the **PWDVA**. The judgment gave a guarantee to the victims to claim money for mental anguish, hence giving more emphasis to economic justice while dealing with domestic violence.

5. Custody Orders (Section 21)

Section 21 provides for orders of custody in the event of children if the woman is seeking protection from domestic violence. In the provision, an order for the custody of the children with the woman is made where the children have a chance of being harmed by the abuser. Children are also protected under domestic violence and it comes under general redress.

Delhi High Court, in **Suman Rani v. Jagdish Kumar**¹³, was dealing with the issue of custody of the children in the context of domestic violence. It held that it was within the mother's discretion

¹¹ Rajesh Sharma v. State of Uttar Pradesh, (2017) 10 S.C.C. 801 (India).

¹² Juveria Abdul Majid Patni v. Atif Iqbal Mansoori, (2014) 10 S.C.C. 736 (India).

¹³ Suman Rani v. Jagdish Kumar, (2021) 4 S.C.C. 694 (India).

to be granted leave to accompany the children where the father became violent, reiterating for safeguarding the children from exposure to violence.

6. Legal-aid and Police (Section 9 and 12)

Section 9 directs the police to act against the abuser and grant relief to the victim in an immediate manner. The police should register the FIR and offer protection to the woman if threatened.

Section 12 of the **PWDVA** provides women with legal-aid so that they can be led through the legal process in the event of domestic violence. Legal-aid is provided by the state or non-governmental organizations on behalf of the victim so that she can be given justice.

The **PWDVA** is also in accordance with international conventions like the **Convention on the Elimination of All Forms of Discrimination Against Women**¹⁴, where protection is required to be extended to women against violence. The fact that India is making use of the **PWDVA** shows that India remains interested in upholding international obligations under women's rights.

7. Breach of Orders (Section 31)

Section 31 of the Act authorizes the violation of the provisions under the **PWDVA**. In case the abuser breaches any order of court, such as protection orders or residence orders, he/she will face imprisonment or be fined. The section is also a deterrent against the abuser and offers a remedy to the woman to get the law implemented.

In **V.D. Bhanot v. Savita Bhanot**¹⁵, the Court laid special emphasis on strict enforcement of protection orders. It recognized the difficulty in ensuring compliance with court orders and urged effective enforcement of legal remedies.

The **PWDVA** is a progressive and much-needed legislation to safeguard women against the widespread evil of domestic violence. The Act contains a very wide array of short-term legal remedies protective, economic relief, and protection in the long-term for women. The basis on

¹⁴ Convention on the Elimination of All Forms of Discrimination Against Women, Dec. 18, 1979, 1249 U.N.T.S. 13.

¹⁵ V.D. Bhanot v. Savita Bhanot, (2012) 3 S.C.C. 183 (India).

which it is established as international standards and protection in residence, economic relief, and access to justice makes the Act an effective instrument in India's struggle against domestic violence.¹⁶

V. Intersection with Other Laws and Gendered Analysis

PWDVA is an important Indian law to protect women against domestic violence. **PWDVA** is generally tested in terms of how it overlaps with other laws and how far it aligns with gendered and intersectional analyses. The **PWDVA** overlaps with the following legislations:

1. IPC Section 498A¹⁷

This chapter addresses cruelty, that is, violence caused by reason of dowry. But it does not address emotional, sexual, or economic abuse, which are dealt with under the **PWDVA**. This leaves a need for more legal relief to deal with all aspects of domestic violence.¹⁸

2. Hindu Succession Act¹⁹

Whereas this law promises daughters their rights to inheritance, domestic violence is employed to deny women the inheritance right of property in the family. Abusers intimidate or compel women to renounce their due share, and hence, the full protection of the **PWDVA** is essential.

3. Maintenance and Welfare of Parents and Senior Citizens Act²⁰

This legislation covers the elderly but does not activate each time family seniors are abused. The **PWDVA** can supplement this legislation by addressing immediate family members committing abuse and further providing general relief.

The above convergences point towards the necessity of harmonized legal laws enabling women seeking orders for protection as well as property rights and effective redressal of other abuses.

¹⁶ Ray, Sawmya. "Legal Constructions of Domestic Violence." *Sociological Bulletin*, vol. 55, no. 3, 2006, pp. 427–48.

¹⁷ Indian Penal Code, No. 45 of 1860, § 498A, India Code (1860).

¹⁸ Jayna Kothari. "Criminal Law on Domestic Violence: Promises and Limits." *Economic and Political Weekly*, vol. 40, no. 46, 2005, pp. 4843–49.

¹⁹ The Hindu Succession Act, No. 30 of 1956, India Code (1956).

²⁰ The Maintenance and Welfare of Parents and Senior Citizens Act, No. 56 of 2007, India Code (2007).

A gendered understanding places into context that the oppressed women possess various disadvantages on the basis of caste, class, religion, or disability. Dalit women experience legal denials based on social biases, and rural women experience illiteracy and scarcity of resources. Transgender persons have no specific protection under **PWDVA** but experience specific forms of violence.²¹

Moreover, obtaining an injunction is costly, particularly in lower courts where the cases drag on for months, even years. The cost, added to delays, discourages individuals from making legitimate claims. In *Indian Express Newspapers v. Union of India*²², the Supreme Court laid great emphasis on speedy relief in cases of fundamental rights, but it is this speed itself that is denied when seeking injunctions. The speed in granting injunctions makes them useless after harm has resulted before relief can be given.

For instance, in *Shreya Singhal v. Union of India*²³, the Supreme Court of India struck down *Section 66A of the Information Technology Act*²⁴ which was being invoked to block offending material on the internet. The Court did not address the requirement of effective injunctions for preventing live streaming of derogatory material. Similarly, in environmental cases, for instance, deforestation or pollution, injunctions are ineffective unless elaborate procedural arrangements are made to address immediate problems. In *M.C. Mehta v. Union of India*²⁵, the Supreme Court intervened to prevent the Taj Mahal from being polluted, but anticipatory intervention is an exception in other types of environmental cases.

VI. Interpretation of the Act

PWDVA is a milestone legislation attempting to provide legal protection to women victims of domestic violence in India. The Act has been judicially interpreted time and again with a view to expanding and contracting its coverage and enforcement.

1. Covering Live-in Relationships

²¹ SUJATHA, D. "Redefining Domestic Violence: Experiences of Dalit Women." *Economic and Political Weekly*, vol. 49, no. 47, 2014, pp. 19–22.

²² *Indian Express Newspapers v. Union of India*, (1985) 1 SCC 641.

²³ *Shreya Singhal v. Union of India*, AIR 2015 SC 1523.

²⁴ Information Technology Act, 2000, § 66A, Act No. 21 of 2000 (India).

²⁵ *M.C. Mehta v. Union of India*, AIR 1987 SC 1086.

- The Supreme Court was of the opinion that the Act extends to women residing in a live-in relationship, provided that they are of marriage nature. It extends to women who are not married statutorily but are residing in relationships of marriage nature under the scope of the Act¹.
- In **D. Velusamy v. D. Patchaiammal**²⁶, the Court held that the "domestic relationship" under the Act is a relationship which is expansive in its meaning and includes relations which are not legally recognisable in law as marriage but similar to marriage.

2. Retrospective Application

- The Supreme Court held that the Act could retrospectively be applied to domestic violence prior to the passing of the Act. Therefore, women who were subjected to abuse prior to the Act's implementation have a right even today.
- **Hiral P. Harsora v. Kusum Narottamdas Harsora**²⁷ has elaborated on this doctrine keeping the intent of the Act in mind in order to safeguard women against domestic violence irrespective of when the acts were done.

3. Extent of Respondents

- The Act originally defined a respondent as an "adult male person." But this limitation was overruled by the Supreme Court, and relatives who are females and non-adults were also entertained with their complaints.
- The Court, in **Hiral P. Harsora v. Kusum Narottamdas Harsora**²⁸, held that relief under the Act is also available to females and non-adults because "relative" includes females too.

4. Maintenance of Live-in Partners

- The Supreme Court held that a live-in partner can seek maintenance under the Act even if he/she is not legally married to the respondent. It provides wider relief than **Section 125 of CrPC**²⁹.

²⁶ D. Velusamy v. D. Patchaiammal, (2010) 10 S.C.C. 469 (India).

²⁷ Hiral P. Harsora v. Kusum Narottamdas Harsora, (2016) 10 S.C.C. 165 (India).

²⁸ Hiral P. Harsora v. Kusum Narottamdas Harsora, (2016) 10 S.C.C. 165 (India).

²⁹ Code of Criminal Procedure, No. 2 of 1974, § 125, India Code (1974).

- **Lalita Toppo v. State of Jharkhand**³⁰ once again reiterated that live-in couples can seek maintenance under the Act since economic abuse constitutes domestic violence.

VII. Suggested Reforms and Recommendations

The **PWDVA** has been a step forward in legislation against domestic violence in India. Over time, however, some gaps in the coverage of the Act, its enforcement. There have been some suggestions and amendments brought in this section which can make the law more universal and efficient and simplify the process of implementation to further strengthen the legal act.³¹

1. Enlarging the Definition of Domestic Violence

Even though the **PWDVA** defines domestic violence very broadly, it has been faulted for not including all forms of abuse completely. The Act primarily addresses physical, emotional, economic, and sexual abuse but is unable to address newly emerging forms of harm, such as digital abuse or cyberbullying. Online harassment, unwanted posting of intimate images, and cyberstalking must be included in the legal framework.

Suggested Amendment: Section 3's definition of domestic violence would need to be amended specifically to encompass digital abuse. This would be keeping in line with global tendencies as reflected in global instruments such as the **Council of Europe Convention on Cybercrime**³² and **Information Technology Act**³³, which address cybercrime and electronic communication. Adding provisions against cyberstalking, harassment on the web, and publication of images without consent would make the **PWDVA** more relevant to our age.³⁴

2. Enhancing Implementation and Enforcement Mechanisms

One of the most glaring flaws in the **PWDVA** is the lack of effectiveness in enforcement. All protection order schemes, residence orders, and money relief mechanisms are in place, but the victims need to suffer delays and complexities to be able to obtain timely relief. Police personnel

³⁰ Lalita Toppo v. State of Jharkhand, (2019) 13 S.C.C. 796 (India).

³¹ Karlekar, Malavika. "Domestic Violence." Economic and Political Weekly, vol. 33, no. 27, 1998, pp. 1741–51.

³² Council of Europe Convention on Cybercrime, Nov. 23, 2001, E.T.S. No. 185.

³³ The Information Technology Act, No. 21 of 2000, India Code (2000).

³⁴ Melissa Ressler, Domestic Violence Initiatives in Great Britain and India, 23 CHILD. LEGAL RTS. J. 52 (Winter 2003-2004).

and service providers are not provided with proper training in dealing with domestic violence cases, and there is even hesitation to register complaints and implement court orders in certain instances.

Suggested Amendment: Proposals must include setting up a special unit in the police force that deals only with domestic violence cases. The units must be granted the power of quick and sensitive response to the complaints. The same policy has been adopted under the **Violence Against Women Act in the US**³⁵, where trained officers and domestic violence advocates team up to take immediate action in favor of the victims.

Apart from this, domestic violence courts need to be established, similar to family courts under **the Family Courts Act**³⁶. These courts with judges trained would expedite legal cases so relief could be extended to the victims at an early stage.

3. Full Support to Victims

Even as the **PWDVA** provides relief to some, it does not go far enough in providing victims with full rehabilitation. Beyond the legal remedy, most women survivors of domestic violence need psychological therapy, vocational skill-building, and economic empowerment so that the violence can be interrupted.

Suggested Amendment: The Act shall ensure psychosocial rehabilitation and economic rehabilitation of the victims. Following the **National Policy for Women**³⁷, which is gender-sensitive support systems-based, the **PWDVA** shall include access to counseling services, mental health services, and vocational training. NGOs that work towards women empowerment shall be included as part of the implementation system as well.

Further, the temporary women shelter homes also need to be organized at the local level in order to provide the victims with emergency shelter. This would be in accordance with the **Social**

³⁵ Violence Against Women Act (VAWA) 34 U.S.C. §§ 12291–12512.

³⁶ The Family Courts Act, No. 66 of 1984, India Code (1984).

³⁷ National Policy for Women, Ministry of Women & Child Dev., Govt. of India (2016).

Security Act³⁸, of America, providing shelter and rehabilitation facilities to domestic violence victims.

4. Reframing the Definition of 'Aggrieved Person' and Eligibility Extension

The current definition of an "aggrieved person" under the **PWDVA** extends only to women in marriage and live-in relationships. Domestic violence is not exclusive to such relationships alone, and other women like mothers staying with their sons, elderly women, and daughters are also subjected to domestic violence.

Suggested Amendment: "Aggrieved person" should be defined to cover all women sharing a common dwelling whether related or not. This will bring the **PWDVA** at par with **Section 2(q) of the Maintenance and Welfare of Parents and Senior Citizens Act**³⁹, in the aim to shield senior citizens from abuse.

Secondly, the Act should include transgender victims of domestic violence, extending the cover of protection to vulnerable groups in line with the **Transgender Persons (Protection of Rights) Act**⁴⁰. This will extend protection and relief under the **PWDVA** to all domestic abuse victims.

5. Enhancement of Provisions on Economic Abuse

While the **PWDVA** does consider economic abuse, the law is inadequate when it comes to provisions on the victim's financial effect. Economic abuse commonly manifests in the form of withholding access to resources, dominating earnings, or interference with work.

Suggested Amendment: The law ought to include more definite provisions on property rights and communal property in case of economic abuse. Women find it hard to retain custody of common property once they are out of an abusive relationship. The **Hindu Succession Act**⁴¹ must be taken under the ambit of amendment so that women get rights over property and inheritance in a more

³⁸ The Social Security Act, 42 U.S.C. § 301 et seq. (1935) (USA).

³⁹ The Maintenance and Welfare of Parents and Senior Citizens Act, No. 56 of 2007, India Code (2007).

⁴⁰ Transgender Persons (Protection of Rights) Act, No. 40 of 2019, India Code (2019).

⁴¹ The Hindu Succession Act, No. 30 of 1956, India Code (1956).

defined manner. It will further tighten the **Maternity Benefit Act**⁴², providing maternity leave and safety to working women, making economic independence after violence a reality.

6. International Frameworks and Their Role in Enhancing PWDVA

The **PWDVA** is in line with numerous international human rights instruments that focus on the prevention of violence against women. **The United Nations Declaration on the Elimination of Violence Against Women**⁴³ and **CEDAW**,⁴⁴ for example, call on states to adopt all available legal measures to prevent violence in the home.

Suggested Amendment: India should further reinforce the **PWDVA** in consonance with international norms such as the **Council of Europe's Istanbul Convention**⁴⁵, an excellent model of prevention and countering violence against women. Enactment of the gender-sensitive model in law enforcement and judicial practice, as in Canada by virtue of **the Criminal Code of Canada**⁴⁶, needs to be incorporated in Indian law so that the law is enforced in a way that addresses and is sensitive to the special needs of women.

7. Conceptualizing Awareness and Prevention Mechanisms

In spite of the **PWDVA**, however, women are unaware of their rights or are not in a position to utilize the legal recourse because of pressure from society, illiteracy, or lack of information.

Suggested Amendment: The administration can also organize country-wide campaigns to make people aware of statutory rights of women under the **PWDVA**. These can be conducted through the media, grass-root and voluntary organizations. **Prevention of Sexual Harassment at the Workplace Act**⁴⁷ can be used as an example to provide a much wider public awareness facility to propagate amongst rural and impoverished communities.

⁴² The Maternity Benefit Act, No. 53 of 1961, India Code (1961).

⁴³ United Nations Declaration on the Elimination of Violence Against Women, G.A. Res. 48/104, U.N. Doc. A/RES/48/104 (Dec. 20, 1993).

⁴⁴ Convention on the Elimination of All Forms of Discrimination Against Women, Dec. 18, 1979, 1249 U.N.T.S. 13.

⁴⁵ Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence (Istanbul Convention), May 11, 2011, C.E.T.S. No. 210.

⁴⁶ Criminal Code, R.S.C. 1985, c. C-46 (Can.).

⁴⁷ Prevention of Sexual Harassment at the Workplace Act, No. 14 of 2013, India Code (2013).

VIII. Conclusion

Even though **PWDVA** has been a strong force in combating domestic violence, there are some issues arising that require attention. Of all the potential issues, there can be only one involving cyber violence or cyber abuse as it has gradually turned into a burning question with growing technology and active social media dissemination.

Next-generation women are being targeted more and more through online harassment, cyber stalking, and non-consensual sharing of intimate images. These have not been addressed specifically, and hence, it is important to amend the Act to include digital abuse in its ambit. Other countries, including the UK and Australia, have already encompassed cyber violence in their domestic violence legislation, and India can do the same.

Additionally, the economic abuse laws, currently in place, do not capture the sophisticated financial control tactics employed by most abusers to hold onto victims. The law has to be perfected to provide better guidance on rights to property and financial autonomy for victims, particularly when the victim's access to family resources or property is controlled by the abuser. In terms of long-term impact, the **PWDVA** has certainly helped increase awareness of domestic violence and empower women to take recourse to legal protection.

Whether its long-term success, however, depends on effective enforcement, which is still unequal across regions. The success of the law should be measured by seeing whether there is a consistent decrease in the incidence of domestic violence, greater empowerment of women, and higher reporting and legal action rates.

Further, the cultural impact of the **PWDVA** to bring about cultural attitude change toward domestic violence will take many years to occur. Although the legislation has caused tremendous controversy in regard to gender equality and violence, its real success will be the overall transformation in society as a whole toward altered attitudes toward women and an acceptability for zero tolerance toward domestic violence within India's communities.

In conclusion, a nuanced, intersectional approach to the **PWDVA** is vital to ensure equitable protection and justice for all women facing domestic abuse.