

HONOUR-BASED SUICIDES AND FORCED SUICIDES IN INDIA: A CRITICAL ANALYSIS OF THE LEGAL REGIME AND ITS IMPLEMENTATION

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ABSTRACT

Honour-based suicides and forced suicides remain a serious yet insufficiently explored issue within India's socio-legal landscape, resulting in significant loss of life and profound social consequence. This paper critically evaluates the legal framework regulating suicide in India and assesses its effectiveness in addressing suicides occurring within the broader context of honour-based abuse. While considerable academic attention has been devoted to the links between honour-based abuse and practices such as honour killing, forced marriage and female genital mutilation, comparatively little focus has been placed on suicide as a distinct outcome of honour-based coercion and entrenched patriarchal norm. The paper distinguishes two analytically separate forms of suicide arising within honour-oriented patriarchal settings. The first, termed honour-based suicide, describes situations in which individuals internalise societal stigma and familial expectation, ultimately taking their own lives under intense moral and social pressure without direct physical compulsion. The second, described as forced suicide, involves circumstances in which persistent intimidation, threat or violence effectively drives the victim to end their life, functioning in substance as a disguised form of homicide. While both phenomena originate within structures of honour-based abuse, the distinction between them is doctrinally significant for accurately determining criminal responsibility. The paper argues that the current legal framework, centred on the offence of abetment of suicide under the Bharatiya Nyaya Sanhita and the decriminalisation approach adopted through the Mental Healthcare Act, 2017, does not adequately capture the complex realities of honour-based and forced suicide, and it advances concrete proposals for legal reform aimed at strengthening recognition, investigation and prosecution of these deaths.

KEYWORDS: *Abetment of Suicide; Forced Suicide; Honour-Based Suicide; Honour-Based Abuse; Criminal Law Reform*

1. INTRODUCTION

Notwithstanding sustained economic expansion and a substantial youth population, India continues to confront a deeply rooted socio-cultural challenge in the form of honour-based suicides and forced suicides. These phenomena arise within patriarchal settings where caste stratification, regulation of women's sexuality, and the preservation of collective reputation function as dominant mechanisms of social control; in various parts of the country, particularly its northern regions, informal caste assemblies and extended kinship structures continue to regulate marital choice, enforce endogamy and demand female conformity, and departure from these prescribed norms may invite intimidation, violence or severe social exclusion. The Supreme Court has recognised the continuing prevalence of honour-based abuse and the

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involvement of extra-constitutional bodies in sustaining such practice.¹ This paper's core analytical claim is that Indian criminal law, developed to address discrete acts of physical violence, remains poorly calibrated to capture a category of harm in which the fatal act is nominally self-inflicted yet substantively the product of sustained third-party coercion, a mismatch this paper traces across the statutory, constitutional and comparative material examined in the parts that follow.

The complex character of these incidents means that honour-based suicides are frequently either unreported or formally classified as ordinary suicide without acknowledgment of the coercive context underlying them; National Crime Records Bureau data aggregates suicides under general categories such as family problems and marriage-related issues without isolating honour-based motivation, obscuring the true scale and character of the problem.² The Bureau's 2020 report recorded 7,096 dowry deaths nationally, an average of approximately nineteen deaths per day, and while dowry-related death cannot automatically be equated with honour killing, a considerable proportion of such cases connect to perceptions of familial dishonour attributed to the bride or her natal family, with the actual incidence of honour-based death, particularly where concealed as suicide or accident, widely understood to exceed official figures significantly.³

Although disputes arising from dowry demand frequently precipitate honour killing and forced suicide, the underlying notion of honour extends across a considerably broader spectrum of perceived normative violation. Survivors of sexual assault, particularly young women and girls, may face intense familial and community pressure to end their lives in order to purportedly restore family reputation, societal attitudes shifting stigma and shame onto the victim rather than the perpetrator and thereby producing an oppressive, isolating environment capable of contributing to tragic outcome.⁴ Normative constructs of honour and shame, reinforced by patriarchal authority, demand conformity, obedience and deference to male dominance, while cultural constraint frequently stigmatises divorce, relationship dissolution and the pursuit of external assistance for personal or familial conflict, restricting women's access to protective mechanisms and heightening their exposure to sustained abuse.⁵ Persistent restriction and denial of equal opportunity may severely undermine a woman's

¹ Shakti Vahini v. Union of India, (2018) 7 S.C.C. 192 (India).

² National Crime Records Bureau, Ministry of Home Affairs, Accidental Deaths and Suicides in India 2022 (2023).

³ National Crime Records Bureau, Ministry of Home Affairs, Crime in India 2020 (2020).

⁴ Nandana Subha Vinukumar & Nandana Venugopal, A Critical Analysis of Honour-Related Suicides and the Legal Framework in India, 3 Int'l J. Legal Rsch. & Analysis 1, 3 (2023).

⁵ J. Horder & L. McGowan, Manslaughter by Causing Another's Suicide, 2006 Crim. L. Rev. 1035, 1035-36.

self-esteem, increasing vulnerability to conditions such as anxiety and depression, and in certain contexts, fear of honour killing or violent retribution may itself precipitate suicide driven by internalised shame or fear of retaliation, a dynamic that may partly explain disproportionately high suicide rates recorded among women within particular socio-cultural settings.⁶

1.1 Research Objectives

This paper distinguishes honour-based suicide from forced suicide and examines both phenomena; critically analyses the existing Indian legal framework governing suicide, particularly the provisions relating to abetment of suicide under the Bharatiya Nyaya Sanhita and the decriminalisation approach adopted under the Mental Healthcare Act; and proposes legal and policy reform aimed at strengthening the recognition, investigation and prosecution of honour-based and forced suicide in India.

1.2 Research Methodology

The methodology adopted is primarily doctrinal, involving systematic examination of statutory provision, constitutional principle and judicial precedent relevant to suicide, abetment of suicide and honour-based abuse. The study analyses the Constitution of India, the Indian Penal Code, the Bharatiya Nyaya Sanhita and the Mental Healthcare Act, 2017, with particular emphasis on how these instruments operate where suicide occurs within a coercive, honour-based context, and draws on comparative sociological and criminological literature to situate the Indian legal position within the broader scholarship on honour-based violence.

2. CONCEPTUALISING HONOUR-BASED ABUSE

The National Police Chiefs' Council, formerly the Association of Chief Police Officers, defines honour-based abuse as a crime or incident committed, or potentially committed, to protect or defend the honour of a family or community, a form of domestic abuse in which the governing honour code is typically set at the discretion of male relatives, with women who transgress the prescribed rules punished for bringing perceived shame upon the family.⁷ Infringements capable of triggering such abuse include having a partner outside familial approval, dress perceived as inconsistent with cultural tradition, rejection of a forced marriage, pregnancy outside marriage, interfaith relationships, seeking divorce, or any other perceived departure from community expectation, with perpetrators typically believing that harm or killing represents the only means of restoring family honour once shame is

⁶ Sushil Kumar & Ramveer Singh, *Psychological Trauma of Honor Killings: Survivor and Community Perspectives*, 30 *Educ. Admin.: Theory & Prac.* 6526, 6525-31 (2024).

⁷ Herts Sunflower, *Honour Based Abuse Factsheet*.

perceived to have occurred.⁸ Honour-based abuse need not be violent, and it may affect persons of any gender though women and girls remain its predominant target; it may encompass domestic abuse, threat of violence, sexual or psychological abuse, forced marriage, unlawful confinement, assault, conspiracy to murder, procured abortion, financial and dowry-related abuse, and coercive control including strict monitoring, humiliation and threat, and importantly may also include encouraging or assisting suicide.⁹

3. DISTINGUISHING HONOUR-BASED SUICIDE FROM FORCED SUICIDE

Honour-based suicide, in its non-forced form, refers to a situation in which an individual, typically a woman, takes her own life owing to intense familial and societal pressure arising from allegations of conduct perceived to bring dishonour upon the family; unlike forced suicide, it involves no explicit physical compulsion, though it may be precipitated by sustained honour-based abuse, social ostracism and psychological pressure, the motivation lying in the escape of shame or the perceived restoration of honour rather than in any conventional understanding of voluntary self-harm.¹⁰ Any alleged or perceived transgression of honour codes by a woman is treated as a disgrace to the individual, family and community alike, and women may internalise this shame under such social and psychological pressure that self-destruction is experienced as the only available means of escaping enduring stigma.¹¹ Notably, families are not required to establish actual immoral or disgraceful conduct before invoking this dynamic; mere suspicion or accusation frequently suffices to trigger social condemnation, rendering the woman powerless and effectively expendable in the pursuit of preserving perceived honour.¹² Honour crimes, including honour killing, are frequently rationalised by perpetrators and their communities as mechanisms for removing disgrace or purifying family reputation, a purification paradoxically achieved through lethal violence; a 2023 case in Karnataka's Tumakuru district illustrates the resulting evidentiary difficulty directly, where the death of a seventeen-year-old girl was initially reported as suicide before subsequent investigation exposed inconsistencies leading to the arrest of her father, brother and uncle for murder allegedly motivated by opposition to her inter-caste relationship, demonstrating how

⁸ Savera UK, What Is 'Honour'-Based Abuse (HBA)? Factsheet 2020 (2020).

⁹ Savera UK, *supra* note 8.

¹⁰ Maz Idriss & Jonathan McGahan, Honour-Based Suicides: Shaping Criminal Law, 87 J. Crim. L. 315 (2023).

¹¹ L.L. Osterman & R.P. Brown, Culture of Honor and Violence Against the Self, 37 Pers. Soc. Psychol. Bull. 1611 (2011).

¹² Amnesty Int'l, Pakistan: Honour Killings of Girls and Women 1 (1999).

honour-related deaths may be deliberately misrepresented as suicide to obscure perpetrator accountability.¹³

Forced suicide, by contrast, arises where family members, most commonly male relatives, subject a woman to sustained pressure to end her own life specifically in order to avert criminal liability for homicide, while remaining motivated by the same underlying honour-based considerations; such deaths are properly characterised as forced because they involve direct coercion exercised by the family, and the death is frequently portrayed as self-initiated or accidental precisely to enable those responsible to deny coercion and evade legal accountability.¹⁴ Forced suicide has accordingly been described as occupying the extreme end of the honour-suicide spectrum and, in substance, constituting a form of murder: families compel the victim to take her own life, at times through confinement and instruction to complete the act before release, so that the family remains technically innocent of direct killing while the death is, in every meaningful sense, imposed rather than chosen.¹⁵ The distinction is doctrinally significant precisely because forced suicide is frequently framed as a voluntary act, enabling family members to evade both legal and moral accountability even though the role of familial coercion, properly examined, is entirely evident; the criminological literature treats such cases as significant for investigative and evidentiary purposes precisely because their surface presentation as voluntary acts is itself a deliberate feature of the underlying offence rather than a neutral fact about the death.¹⁶ Regardless of formal classification, both honour-based and forced suicide constitute severe forms of violence against women arising from sustained patterns of abuse, surveillance and domination, reinforced by male authority and supported by familial and community structures seeking to preserve perceived honour and social standing.¹⁷

The distinction between the two categories carries direct doctrinal consequence for criminal law's treatment of causation and culpability. Honour-based suicide, properly understood, raises a question closer to that posed by the abetment offence discussed in Part 5: whether the accused's conduct, harassment, ostracism, sustained psychological pressure, was sufficiently proximate to the victim's decision to end her life to satisfy the "goading" standard Indian courts have developed. Forced suicide, by contrast, raises a

¹³ Express News Service, 'Suicide' of Minor Girl in Karnataka Turns Out to Be Murder; Police Arrest Father, Brother, Indian Express (June 16, 2023).

¹⁴ Maz Idriss & Jonathan McGahan, *supra* note 10.

¹⁵ Roxanne Khan, *The Psychology of Honor Abuse, Violence, and Killings* (Routledge 2025).

¹⁶ J.M. Smith et al., *Building a Temporal Sequence of Developing Prevention Strategies, Risk Assessment, and Perpetrator Interventions in Domestic Abuse Related Suicide, Honour Killing, and Intimate Partner Homicide* 29 (Univ. of Gloucestershire 2022).

¹⁷ Maz Idriss & Jonathan McGahan, *supra* note 10.

more fundamental question of whether the offence should be classified as suicide at all, given that the victim's agency has been displaced so completely by direct coercion that the resulting death more accurately resembles murder committed through an unwilling instrument than a self-directed act falling within the ordinary understanding of suicide. Treating both categories under the single statutory rubric of abetment, as the present law does, risks understating the culpability appropriate to forced suicide specifically, since a charge of abetment carries a materially lower stigma and evidentiary threshold than a charge of murder, even where the underlying conduct, confinement and direct instruction to complete a fatal act, differs from conventional homicide only in the technical mechanism by which death was brought about.

Comparative sociological scholarship supplies useful analytical grounding for this distinction. Kandiyoti's concept of "classic patriarchy" illuminates suicides linked to infertility or perceived failure to meet reproductive expectation, showing how women in agrarian settings derive limited and conditional authority through childbearing and control over younger female relatives, such that deviation from these prescribed roles invites punishment or social degradation with a profound bearing on suicidal behaviour.¹⁸ The widely discussed case of Pinki Pramanik, a national-level Indian athlete subjected to severe social exclusion and public scrutiny following sexual-assault allegations, illustrates the challenge of legally establishing coercion exercised through psychological distress, reputational harm and social isolation rather than overt physical force, a gap this paper's analysis treats as central to the inadequacy of the existing legal regime.¹⁹ Suicides connected to romantic relationships should accordingly not be interpreted simplistically as acts of emotional impulsivity; they more often reflect wider social pressure, gendered surveillance and the absence of effective institutional or familial support, with non-conformity construed within honour-based systems as a threat to collective dignity precisely because women are constructed as bearers of that collective honour.²⁰

4. CONSTITUTIONAL AND JUDICIAL FOUNDATIONS

Every person possesses a fundamental right to life with dignity and to equality under Articles 21 and 14 of the Constitution, and the Supreme Court has explicitly protected individual choice in marriage while condemning honour-based violence in unambiguous terms.²¹ In *Lata Singh v. State of U.P.*, the Court held that once a person attains majority, they may marry whomever they

¹⁸ Deniz Kandiyoti, *Bargaining with Patriarchy*, 2 *Gender & Soc'y* 274, 274-90 (1988).

¹⁹ Vrinda Marwah, *Gender Bending, Gender Testing: Reflections on the Pinki Pramanik Case*, 10 *Indian J. Med. Ethics* 181, 182 (2013).

²⁰ Pravati Dalua & Chittaranjan Behera, *Exploring Suicide Trends in India: Marriage, Gender, and Family Roles*, 12 *J. Cmty. Health Mgmt.* 52, 46-55 (2025).

²¹ The Constitution of India, 1950, art. 21.

choose, that family or community consent is not required for two consenting adults to marry, and that threats, violence or honour killing directed against such marriages are wholly illegal, barbaric and shameful acts, further declaring inter-caste marriage to be in the national interest and directing police to protect consenting couples.²² In *Arumugam Servai v. State of Tamil Nadu*, the Court held that there is nothing honourable in honour killing, which constitutes nothing but barbaric and shameful murder.²³ In *Ude Singh v. State of Haryana*, the Court held that harassment of women on grounds of caste or gender offends Articles 14, 15 and 21, confirming that constitutional guarantee underpins the criminal law's prohibition of coercion exercised in the name of honour.²⁴

5. THE PENAL FRAMEWORK: ABETMENT OF SUICIDE AND RELATED OFFENCES

Indian law does not single out honour-based or forced suicide as a distinct offence category, though several general provisions apply to the conduct such deaths involve. Section 108 of the *Bharatiya Nyaya Sanhita*, continuing the earlier Section 306 of the Indian Penal Code, criminalises abetment of suicide, punishable by up to ten years' imprisonment together with fine, addressing situations in which an individual instigates, aids or otherwise facilitates another's suicide; where evidence establishes that coercion, intimidation or sustained pressure compelled the deceased to end her own life, criminal liability may arise under this provision.²⁵ The abetment offence's central evidentiary requirement, a demonstrated act of instigation or "goading," was developed in a doctrinal context far removed from the honour-based fact pattern this paper examines, typically arising in cases of workplace or marital harassment where the coercive conduct and the resulting death occur within a comparatively compressed timeframe and a single identifiable relationship; honour-based cases, by contrast, frequently involve diffuse pressure exerted by an extended family or community network over months or years, a pattern the doctrine's origin in more discrete harassment scenarios did not anticipate and to which courts have had to adapt the goading standard through case-by-case interpretation rather than express statutory guidance. Courts have consistently held that abetment requires a "goading" or deliberate act driving the victim to suicide, and in *Ude Singh v. State of Haryana*, the Supreme Court affirmed a conviction under the abetment provisions read with the offence of acting in concert, holding that persistent taunting and humiliating conduct by family members toward an unmarried woman sufficed to demonstrate that she had

²² *Lata Singh v. State of U.P.*, (2006) 5 S.C.C. 475 (India).

²³ *Arumugam Servai v. State of Tamil Nadu*, (2011) 6 S.C.C. 405 (India).

²⁴ *Ude Singh v. State of Haryana*, (2019) 17 S.C.C. 301 (India).

²⁵ The Indian Penal Code, No. 45 of 1860, § 306 (India) (repealed); The *Bharatiya Nyaya Sanhita*, No. 45 of 2023, § 108 (India).

effectively been driven to take her own life.²⁶ Where the circumstances of death instead indicate a homicidal act, liability arises under the murder provisions now codified in Section 103 of the Bharatiya Nyaya Sanhita, and in cases involving marital abuse, a woman's death may attract the cruelty offence under Section 85 of the Sanhita, continuing the earlier Section 498A of the Penal Code, alongside the dowry-death offence under Section 80, continuing the earlier Section 304B, provisions of particular significance where honour-based abuse or familial coercion produces a death subsequently portrayed as suicide.²⁷ Section 113A of the Indian Evidence Act further supplies a rebuttable presumption of abetment, permitting courts to presume that a husband or his relatives abetted the suicide of a married woman who dies within seven years of marriage where that death is connected to cruelty or violence inflicted by them, a presumption of considerable practical significance given the evidentiary difficulty inherent in proving honour-based coercion directly.²⁸

The Protection of Women from Domestic Violence Act, 2005 adopts a broad, inclusive understanding of domestic violence encompassing physical, emotional, verbal, sexual and economic harm, and its illustrative provisions expressly recognise coercive marital practice, including compelling a woman into marriage against her will or obstructing her choice of partner, as constituting domestic violence, thereby extending its protective framework to forced marriage specifically.²⁹ The Act's civil remedies, protection orders, residence orders and monetary relief, operate independently of the criminal law provisions traced above and offer a potentially valuable preventive avenue in honour-based cases, since a protection order obtained before a threatened suicide or killing occurs can in principle intervene at a stage the criminal law, oriented as it is toward post hoc prosecution, structurally cannot reach; in practice, however, victims facing honour-based coercion face the same underreporting and family pressure that constrains criminal complaint, limiting the Act's practical reach in precisely the cases where its preventive function would matter most.

6. THE MENTAL HEALTHCARE ACT AND THE DECRIMINALISATION PARADIGM

The Mental Healthcare Act, 2017 marks a significant shift in India's legal approach to suicide, decriminalising attempted suicide under Section 115 and reflecting a rights-based, public-health orientation that the Bharatiya Nyaya Sanhita has carried forward by omitting any provision criminalising attempted

²⁶ Ude Singh v. State of Haryana, (2019) 17 S.C.C. 301 (India).

²⁷ Vikaspedia, Abetment of Suicide.

²⁸ Id.

²⁹ Department of Social Welfare & Women Empowerment, Government of Tamil Nadu, Indian Laws Related to Women.

suicide, resolving the interpretive confusion that had previously arisen from the continued formal presence of the now-repealed Section 309 of the Penal Code alongside the Act's decriminalising provision.³⁰ While this reform is grounded in sound public-health principle, its application to honour-based and forced suicide presents genuine complexity. The Mental Healthcare Act's presumption of "severe stress," applicable to a person who has attempted suicide, assumes particular significance in the honour-based context, since persons exposed to sustained psychological harm, intimidation, social exclusion and coercive control may outwardly appear to have acted voluntarily even where their conduct is substantially shaped by structural subordination rather than genuine autonomy.³¹ This framework permits such deaths to be understood as manifestations of psychological distress rather than criminality, aligning with a socio-legal perspective that locates honour-related suicide within enduring structures of social coercion rather than individual pathology, yet this analytical reframing carries a corresponding risk this paper's analysis treats as significant: a presumption designed to protect the person who has attempted suicide from criminal liability for that act must not, in the process, foreclose a separate and independent criminal inquiry into whether family or community members abetted or coerced that same act, since the two questions, the criminal liability of the person who attempted suicide and the criminal liability of those who drove her to it, are analytically distinct and require correspondingly distinct legal treatment.³²

This tension between decriminalisation and accountability is worth developing further, since it recurs throughout Indian mental health and criminal law reform more generally. A statute designed with the ordinary suicide case in mind, one arising from individual psychiatric distress without an identifiable coercing party, naturally centres its remedial focus on the person who attempted suicide, extending them treatment and protection from prosecution rather than punishment. Honour-based and forced suicide, however, present a materially different fact pattern in which a second, culpable party stands behind the victim's severe stress, and a statute drafted without this second party specifically in view risks, through simple silence, allowing that party's contribution to escape the same accountability the statute rightly extends compassion to the primary victim. The Mental Healthcare Act itself contains no provision addressing this second-party liability question directly, leaving the task of reconciling decriminalisation with abetment prosecution entirely to the

³⁰ Ramya Pillutla, Decriminalising Attempted Suicide in India: The New Penal Code, Keshav Desiraju India Mental Health Observatory Blog (Oct. 30, 2023).

³¹ *State of West Bengal v. Orilal Jaiswal*, (1994) 1 S.C.C. 73 (India).

³² Vandana Bhatia, Gender, Honour and Suicide in South Asia, 44 *Econ. & Pol. Wkly.* 65 (2009).

general provisions of the Bharatiya Nyaya Sanhita examined in Part 5, an interpretive burden the statute's own text does nothing to lighten.

7. IMPLEMENTATION CHALLENGES AND RECOMMENDATIONS

A central objective of criminal law is to protect victims while deterring and sanctioning wrongful conduct, a protective function frequently undermined in cases of honour-based and forced suicide by structural gaps that permit perpetrators to evade responsibility even where sustained coercion directly contributed to the victim's death.³³ Law enforcement personnel, judges and juries may hold unconscious bias regarding honour-based crime, producing leniency in sentencing or reluctance to treat the offence with appropriate seriousness, while proving coercion in practice remains genuinely difficult, since, as the Court observed in *Ude Singh*, mere harassment or occasional taunting, absent a demonstrated course of conduct leading to suicide, will not sustain conviction, and families rarely admit to forcing a death while victims themselves seldom disclose the underlying pressure before dying, leaving dying declarations, where available, as the primary evidence subject to close judicial scrutiny.³⁴ In closely knit social settings, victims' families are frequently pressured to retract complaints or extend forgiveness to preserve perceived community honour, undermining prosecution, while witnesses face intimidation that discourages testimony, and the secrecy characteristically surrounding these deaths complicates the collection of forensic evidence more generally; the boundary between coercion and mere undue influence, moreover, often remains genuinely indistinct as a matter of proof, complicating the demonstration that a victim was deliberately compelled toward death.³⁵

Several reforms follow from this analysis. The introduction of a distinct statutory offence of suicide aggravated by harassment, violence or abuse would represent a significant advance, redirecting legal scrutiny toward the accused's pattern of abusive or coercive conduct rather than centring liability on the victim's mental state or psychiatric assessment, producing greater doctrinal clarity and fairer outcomes where suicide emerges from sustained abuse; legal reform alone, however, remains insufficient without a comprehensive strategy addressing the underlying social norms sustaining these practices.³⁶ Such a provision could usefully draw on the distinction developed in Part 3 between

³³ Maz Idriss & Jonathan McGahan, *supra* note 10.

³⁴ Editor, Supreme Court Discusses Essential Ingredients S. 306 IPC, SCC Online Blog (Dec. 11, 2024).

³⁵ Deler Singh & Dipali S. Bhandari, *Legacy of Honor and Violence: An Analysis of Factors Responsible for Honor Killings in Afghanistan, Canada, India, and Pakistan*, 11 SAGE Open 1 (2021).

³⁶ Amelia Hill, *Campaigners Call for New Homicide Law for Inciting Suicide*, The Guardian (Mar. 19, 2012).

honour-based and forced suicide, prescribing a graduated liability structure in which forced suicide, involving direct coercion of the kind confinement-with-instruction cases exemplify, attracts penalties approaching those for murder, while honour-based suicide arising from sustained but less direct pressure attracts a correspondingly calibrated intermediate sanction, giving statutory expression to a distinction the criminal law presently collapses into the single, comparatively lenient category of abetment.

Statutory authorities should strengthen the collection and classification of data specific to honour-based and forced suicide, prioritising effective investigation, evidence-gathering and prosecution of those responsible, while public-education initiatives and community-level outreach can play a critical role in confronting patriarchal attitude and advancing gender equality more broadly.³⁷ A dedicated NCRB classification code for honour-motivated suicide, distinct from the general dowry-death and family-dispute categories presently used, would meaningfully improve the evidentiary base on which future policy and legislative reform could draw, addressing directly the data deficit identified in Part 1 as a persistent obstacle to accurately gauging the scale of the problem. Expanding access to education and economic opportunity for women and girls strengthens the autonomy needed to question restrictive social norms, and engaging men and boys directly in dialogue on gender equality remains equally important to any durable solution.³⁸ Investigating authorities and prosecutors would further benefit from specialised training in recognising the evidentiary signatures of forced and honour-based suicide, including patterns in the timing, location and method of death, the presence of prior recorded family conflict over the deceased's relationship or conduct, and any documented history of restriction or surveillance, indicators that, taken together, can distinguish these cases from suicide arising from unrelated personal circumstance even where direct evidence of coercion remains difficult to obtain. Finally, the Mental Healthcare Act's progressive, victim-oriented framework must be implemented in a manner carefully coordinated with criminal law mechanisms, ensuring that its statutory presumption of mental distress does not inadvertently foreclose concurrent inquiry into coercion, abetment or honour-based abuse perpetrated by family or community members.³⁹

³⁷ Rural Development & Stability Program, Help Stop Honor Killing Through Awareness Program, GlobalGiving.

³⁸ Manteswar Barman, Women Education and Women Employment: Opportunities and Challenges, 11 *Int'l J. Applied Rsch.* 210 (2025).

³⁹ Manisha Shastri et al., The Central Role India's Courts Have Played to Protect People with Mental Illness, *The Wire Science* (Oct. 21, 2021).

8. CONCLUSION

The invocation of honour to legitimise violence against female family members reflects a broader structure of honour-based patriarchy in which gender inequality is both normalised and sustained. In cases of honour-based and forced suicide, perpetrators may derive emotional gratification from the belief that family honour has been restored while simultaneously evading the legal consequences that would follow direct violence. Although honour-based suicide is often portrayed as the product of individual choice, prolonged exposure to intimidation, abuse and coercive control frequently leaves the victim with no meaningful perception of alternatives, such that suicide is experienced as the sole available means of escaping continuous domination; in cases of forced suicide, the element of choice is absent altogether, death being effectively imposed through direct or indirect compulsion by family members. Any suicide occurring within a context of heightened vulnerability of the kind traced throughout this paper should accordingly prompt investigating authorities to examine the possibility of honour-based or forced suicide specifically, with criminal responsibility attributed in accordance with the degree of coercion and involvement actually established. The introduction of a distinct statutory offence addressing suicide aggravated by harassment, violence or abuse could substantially strengthen the existing legal mechanism governing these deaths, improving accountability and access to justice while requiring law enforcement to engage with such cases with the seriousness their coercive character demands, provided careful legal calibration continues to attend to questions of causation and to the genuine complexity surrounding a victim's mental state. Ultimately, eliminating honour-based and forced suicide requires a holistic strategy integrating legal reform with sustained social intervention and cultural transformation, since only by addressing both structural inequality and legal deficiency together can conditions be created in which women and girls are able to live free from coercion, violence and fear.

This paper has examined suicide and coerced death as matters of legal doctrine and public policy; readers personally affected by the issues discussed are encouraged to seek support from a qualified mental health professional or an appropriate crisis helpline.

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