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CONSTITUTIONAL PRINCIPLES FOR PERSONAL LAW REFORM IN INDIA

Balancing Uniform Civil Code, Religious Freedom and Gender Justice

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ABSTRACT

India's personal-law system reflects the country's religious and cultural pluralism. At the same time, differences among personal-law regimes have generated constitutional questions relating to equality, gender justice, dignity, individual autonomy, religious freedom and secularism. Article 44 of the Constitution directs the State to endeavour to secure a Uniform Civil Code (UCC), while Articles 25 and 26 protect freedom of conscience, religious practice and denominational rights, subject to constitutional limitations. Articles 14, 15 and 21 provide a further constitutional framework for equality, non-discrimination, liberty and dignity.

This research paper examines the constitutional principles governing personal-law reform in India. It studies the historical development of personal laws, the constitutional position of Articles 14, 15, 21, 25, 26, 29 and 44, and the judicial approach of the Supreme Court. Decisions including *Mohd. Ahmed Khan*

v. Shah Bano Begum, *Sarla Mudgal v. Union of India*, *Danial Latifi v. Union of India*, *John Vallamattom v. Union of India*, *Shayara Bano v. Union of India* and *Jose Paulo Coutinho v. Maria Luiza Valentina Pereira* are examined.

The paper also considers arguments supporting and questioning a UCC, the distinction between uniformity and harmonisation, and the contemporary Uttarakhand model. It proposes a constitutional framework based on substantive equality, gender justice, individual autonomy, proportionality, democratic consultation and effective implementation.

KEYWORDS

Uniform Civil Code; Personal Law; Article 44; Article 14; Article 21; Religious Freedom; Gender Justice; Constitutional Morality; Secularism; Personal Law Reform.

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1. INTRODUCTION

India is one of the world's most religiously and culturally diverse constitutional democracies. The Constitution does not attempt to erase this diversity. Instead, it establishes a legal structure in which individual citizenship coexists with religious, linguistic and cultural identities.

Family law is one of the areas in which this pluralism is particularly visible. Marriage, divorce, maintenance, succession, inheritance, guardianship and adoption have historically been regulated through a combination of religious traditions, customs, legislation and judicial decisions. After independence, Parliament codified substantial portions of Hindu law, while other communities continued to be governed by separate statutory and personal-law frameworks.

The resulting system is often described as a plural personal-law regime. It enables different communities to preserve aspects of their traditions, but it also means that individuals may experience different legal consequences in similar family situations.

This creates an important constitutional problem. The Constitution guarantees equality before law under Article 14 and prohibits specified forms of discrimination under Article 15. Article 21 protects life and personal liberty and has been interpreted to include dignity, privacy and autonomy. At the same time, Articles 25 and 26 protect religious freedom and denominational rights.

Article 44 introduces another constitutional dimension by directing the State to endeavour to secure a Uniform Civil Code. The provision has been debated since the framing of the Constitution and continues to raise questions concerning equality, secularism, minority rights and the meaning of constitutional pluralism.

The debate is therefore not simply whether India should have a UCC. It is about the constitutional method through which personal-law reform should occur. The central issue is how to reconcile the rights of individuals with the legitimate protection of religious and cultural diversity.

2. STATEMENT OF THE PROBLEM

India's multiple personal-law systems may create differences in legal rights and obligations based on the applicable religious or statutory framework. Differences may concern marriage, divorce, maintenance, inheritance, adoption and guardianship.

Some personal-law provisions and practices have been criticised because of their potential

impact on gender equality or individual autonomy. Judicial decisions and legislative reforms have addressed several such issues over time.

However, personal laws are also connected with community identity. For many citizens, family practices are not merely private legal rules but are associated with religion, tradition and culture. A reform model that disregards this dimension may create concerns under Articles 25, 26 and 29.

The problem is therefore to identify a constitutionally defensible method of reform. Such a method must answer whether all civil matters should be governed identically, how far religious freedom extends into family law, whether equality requires identical rules, whether a UCC should be comprehensive or gradual, and how individual rights can be protected without unnecessarily eliminating legitimate cultural diversity.

3. RESEARCH QUESTIONS

1. What is the constitutional status of personal laws in India?
2. What is the relationship between Articles 14, 15, 21, 25, 26, 29 and 44?
3. What is the legal significance of Article 44?
4. How has the Supreme Court approached personal-law reform?
5. How do personal laws interact with gender justice?
6. What arguments support a Uniform Civil Code?
7. What constitutional concerns arise from compulsory uniformity?
8. What lessons can be drawn from the Uttarakhand UCC?
9. Can harmonisation provide an alternative or complementary method of reform?
10. What constitutional safeguards should accompany future reform?

4. OBJECTIVES OF THE STUDY

- To examine the historical and constitutional foundations of personal laws.
- To analyse Article 44 and its relationship with fundamental rights.
- To study major Supreme Court decisions concerning personal-law reform.
- To examine the relationship between religious freedom and secular civil law.
- To analyse gender-justice concerns.
- To identify arguments supporting and questioning a UCC.
- To study the Uttarakhand model.
- To examine the distinction between uniformity and harmonisation.

- To formulate a balanced constitutional framework for personal-law reform.

5. HYPOTHESIS

Personal-law reform in India can be constitutionally sustainable when it is directed towards substantive equality, dignity, liberty and gender justice while respecting legitimate religious and cultural autonomy. A comprehensive UCC is one possible legislative model, but constitutional objectives can also be pursued through progressive harmonisation and issue-specific reform, provided that fundamental rights are effectively protected.

6. RESEARCH METHODOLOGY

This research adopts doctrinal legal research. Primary sources include the Constitution of India, statutes, judicial decisions and official government materials. Secondary sources include Law Commission materials, academic commentary and legal scholarship.

The research is analytical rather than empirical. It compares constitutional provisions and judicial reasoning and examines the Uttarakhand UCC as a contemporary legislative example. The paper distinguishes between established legal rules, judicial observations, policy arguments and contested interpretations.

7. HISTORICAL DEVELOPMENT OF PERSONAL LAWS IN INDIA

Personal laws in India have a long historical development. Before codification, family relations were influenced by religious texts, customary practices, community institutions and local traditions. Colonial administration gradually introduced legislative interventions while generally maintaining separate rules for several communities in family matters.

The colonial period therefore contributed to the development of the modern concept of personal law. The legal system did not create a single family-law code for the entire population. Instead, different religious and customary rules continued alongside general legislation.

After independence, constitution-makers faced the question of whether India should immediately adopt uniform civil legislation. Article 44 was ultimately included among the Directive Principles. The constitutional choice reflected an aspiration towards common civil standards while avoiding an immediate compulsory transformation of personal laws. Post-independence Hindu law was extensively codified through the Hindu Code reforms of the 1950s. Other communities continued to be governed by their own statutory and

personal-law arrangements. The Special Marriage Act created a religion-neutral route for civil marriage.

The history therefore demonstrates that Indian family law has developed through gradual legislative reform rather than through a single comprehensive code.

8. MAJOR PERSONAL-LAW SYSTEMS

8.1 Hindu Law

The principal codifying statutes include the Hindu Marriage Act, 1955, Hindu Succession Act, 1956, Hindu Minority and Guardianship Act, 1956 and Hindu Adoptions and Maintenance Act, 1956. These statutes significantly transformed the pre-existing legal framework.

8.2 Muslim Law

The Muslim Personal Law (Shariat) Application Act, 1937 provides for the application of Muslim personal law in specified matters. Muslim family law has also been affected by later legislation and judicial decisions.

8.3 Christian Law

The Indian Christian Marriage Act, 1872 regulates Christian marriages in specified circumstances. The Divorce Act, 1869 provides a statutory framework concerning divorce and matrimonial relief.

8.4 Parsi Law

The Parsi Marriage and Divorce Act, 1936 governs marriage and divorce among Parsis.

8.5 Special Marriage Act

The Special Marriage Act, 1954 creates a secular framework for marriage irrespective of religion, subject to statutory requirements. It demonstrates that Indian law already contains a religion-neutral route for civil marriage.

These frameworks show that the Indian system is neither completely uniform nor completely separate. General civil statutes and community-specific laws coexist.

9. CONSTITUTIONAL FRAMEWORK

9.1 Article 14 – Equality

Article 14 guarantees equality before law and equal protection of laws. In personal-law disputes, the provision raises questions about whether differences in legal treatment have a constitutionally adequate basis.

9.2 Article 15 – Non-Discrimination

Article 15 prohibits State discrimination on specified grounds including religion and sex. Gender-discriminatory legal rules therefore require constitutional scrutiny.

9.3 Article 21 – Liberty and Dignity

Article 21 protects life and personal liberty. Supreme Court jurisprudence has expanded the provision to include dignity, privacy and aspects of personal autonomy. Family law directly affects many of these interests.

9.4 Article 25 – Religious Freedom

Article 25 protects freedom of conscience and religious practice subject to constitutional limitations.

9.5 Article 26 – Denominational Rights

Article 26 protects specified rights of religious denominations, again subject to constitutional limitations.

9.6 Article 29 – Cultural Interests

Article 29 protects the interests of sections of citizens having a distinct language, script or culture. Its application to particular personal-law rules depends upon the legal context.

9.7 Article 44 – Directive Principle

Article 44 directs the State to endeavour to secure a Uniform Civil Code. Because it appears in Part IV, it is a Directive Principle rather than an independently enforceable fundamental right.

10. ARTICLE 44 AND THE UNIFORM CIVIL CODE

Article 44 states: "The State shall endeavour to secure for the citizens a uniform civil code throughout the territory of India."

The language of Article 44 is important. It imposes a constitutional direction to endeavour, rather than prescribing a detailed code or a fixed timetable. The Constitution therefore establishes an objective but leaves substantial room for legislative design.

Article 37 provides that the Directive Principles are not enforceable by any court, but they are fundamental in the governance of the country and it is the duty of the State to apply them in making laws.

Consequently, Article 44 cannot be treated as if it overrides fundamental rights. A UCC would itself have to comply with the Constitution.

The constitutional relationship can therefore be expressed as follows: Article 44 supplies

a policy direction towards civil uniformity; Articles 14, 15 and 21 provide individual rights; and Articles 25 and 26 protect religious freedom subject to constitutional limitations. A valid legislative framework must accommodate these principles rather than treating one provision as automatically cancelling the others.

11.LITERATURE REVIEW

Academic and legal scholarship on personal-law reform can broadly be grouped into several approaches.

The first approach emphasises constitutional equality. Scholars working from this perspective examine personal laws through Articles 14, 15 and 21 and focus particularly on women's rights, dignity and individual autonomy. The central concern is that community-based rules should not be allowed to produce unjustified inequalities.

The second approach emphasises legal pluralism. From this perspective, different personal laws can reflect India's constitutional accommodation of diversity. The concern is that a uniform code may inadvertently privilege one cultural conception of family over others if it is drafted without adequate participation.

The third approach focuses on secularism and the relationship between State and religion. This literature examines whether family law should be regarded primarily as secular civil law or as an area in which religious autonomy deserves substantial protection.

A fourth approach examines reform from an institutional perspective. It asks whether courts, legislatures or specialised law-reform bodies are best positioned to modify personal laws and how democratic legitimacy should be maintained.

The fifth approach considers incremental reform. Instead of asking whether every personal law should immediately be replaced by a single code, this approach examines whether particular discriminatory or outdated provisions can be harmonised through targeted legislation.

The literature therefore demonstrates that the UCC debate is not a simple binary dispute. It contains competing constitutional theories concerning equality, pluralism, secularism, institutional competence and individual autonomy.

12.PERSONAL LAWS AND RELIGIOUS FREEDOM

One of the most important questions is whether every personal-law rule is protected as an essential religious practice.

The constitutional text does not say that every rule historically associated with religion is immune from State regulation. Article 25 itself permits legislation for public order, morality, health and other constitutionally recognised purposes.

The Supreme Court has also distinguished religious practices from secular activities associated with religion. Marriage, succession, maintenance and inheritance can have religious dimensions while simultaneously creating civil consequences.

In *John Vallamattom v. Union of India* (2003), the Court discussed the secular character of several family-law subjects while considering Article 44.

The proper approach therefore requires attention to the specific practice, its religious character, the right affected, the statutory framework and the justification for State intervention. A general assumption that either all personal law is religious or none of it is religious would be too broad for constitutional analysis.

13. JUDICIAL APPROACH TO PERSONAL-LAW REFORM

13.1 Mohd. Ahmed Khan v. Shah Bano Begum

The Supreme Court considered maintenance under secular criminal procedure legislation. The decision became an important reference point in debates concerning personal law, women's rights and Article 44.

13.2 Sarla Mudgal v. Union of India

The case concerned conversion and a second marriage during the subsistence of an earlier Hindu marriage. The Court held that conversion did not automatically dissolve the existing marriage and discussed Article 44.

13.3 Danial Latifi v. Union of India

The Court considered the constitutional validity and interpretation of the Muslim Women (Protection of Rights on Divorce) Act, 1986. The judgment addressed the protection available to divorced Muslim women and the relationship between statutory interpretation and constitutional rights.

13.4 John Vallamattom v. Union of India

The case concerned a provision of the Indian Succession Act affecting Christians. The Court struck down the impugned provision and discussed secular aspects of family law.

13.5 Shayara Bano v. Union of India

The case concerned talaq-e-biddat. The Supreme Court invalidated the practice through a divided judgment. It illustrates that a particular personal-law practice can be

constitutionally reviewed without replacing the whole personal-law system.

13.6 Jose Paulo Coutinho v. Maria Luiza Valentina Pereira

The case concerned succession in Goa and the continuing operation of the Portuguese Civil Code for certain matters. It is relevant to discussions of common civil standards.

14. GENDER JUSTICE AND PERSONAL LAWS

Gender justice is a central dimension of personal-law reform. Family law can determine economic security, property ownership, marital status, maintenance and caregiving responsibilities.

A gender-justice analysis should examine both formal rules and practical effects. Equal wording does not necessarily guarantee equal outcomes where social and economic conditions are unequal.

Reform should therefore consider whether women and men have equal legal capacity to marry, divorce, inherit property, claim maintenance, exercise guardianship and make family decisions.

The constitutional principles of equality and dignity require attention to rules that produce unjustified sex-based disadvantage. At the same time, gender justice should be applied consistently across communities rather than being treated as a concern relating only to one religious group.

The objective should be a rights-based family-law framework in which legal protection does not depend upon gender or religious identity.

15. ARGUMENTS SUPPORTING A UNIFORM CIVIL CODE

15.1 Equality Before Law

Supporters argue that a common civil framework could reduce differences in legal rights based on religion.

15.2 Gender Justice

A common framework could establish common minimum standards for marriage, divorce, maintenance, inheritance and guardianship.

15.3 Legal Certainty

Uniform rules may simplify legal advice, adjudication and administration where individuals from different communities interact.

15.4 Individual Rights

A UCC could emphasise individuals as rights-bearing citizens rather than allowing community identity to determine every aspect of family law.

15.5 National Integration

Some judicial observations have associated common civil standards with national integration. The argument is that shared civil rules could strengthen common citizenship. These are policy arguments about possible consequences; actual effects would depend upon the precise content and implementation of legislation.

16. ARGUMENTS CONCERNING A COMPULSORY UCC

16.1 Religious Freedom

Some personal-law practices are closely connected with religious identity. A compulsory code may therefore raise questions under Articles 25 and 26.

16.2 Minority Rights

India's constitutional structure recognises diversity. A reform process that does not adequately consult affected communities may create concerns concerning representation and cultural autonomy.

16.3 Uniformity and Equality Are Not Identical

Identical rules may produce different practical effects for people in different social circumstances. Formal uniformity therefore does not by itself establish substantive equality.

16.4 Customary and Tribal Practices

India contains diverse customary systems. A national code would need to address constitutional protections and exemptions carefully.

16.5 Privacy and Autonomy

Family-law regulation can involve highly personal decisions. Registration, disclosure and administrative requirements should therefore be tested against privacy and autonomy principles.

These concerns identify constitutional and legislative questions that a reform model would need to address.

17. UNIFORMITY, HARMONISATION AND CONSTITUTIONAL PLURALISM

Uniformity means that citizens are governed by substantially identical rules. Harmonisation permits different traditions to continue while establishing common constitutional minimum standards.

A harmonisation approach could focus first on rights where constitutional consensus is strongest, such as equality in inheritance, protection from marital exploitation, minimum procedural safeguards and equal access to remedies.

Progressive reform can also reduce the risk associated with changing multiple complex legal systems simultaneously. It permits lawmakers and courts to assess practical effects before extending reform.

Constitutional pluralism does not mean that every tradition must remain unchanged. Rather, it recognises that diversity can coexist with constitutional limits.

The relevant distinction is therefore between legitimate diversity and unjustified inequality. Personal-law reform can protect the former while addressing the latter.

18. CASE-LAW COMPARATIVE ANALYSIS

The major cases show different methods through which constitutional law interacts with personal law.

Shah Bano demonstrates the role of secular maintenance law in protecting an individual's claim despite the existence of personal-law arguments.

Sarla Mudgal illustrates how the legal consequences of conversion can be examined through existing marriage and criminal-law principles and also shows the Court's discussion of Article 44.

Danial Latifi demonstrates the importance of constitutional interpretation in protecting statutory rights.

John Vallamattom demonstrates that legislation applicable to a religious community can still be tested against constitutional standards.

Shayara Bano illustrates direct constitutional scrutiny of a specific personal-law practice.

Jose Paulo Coutinho illustrates the continuing relevance of Goa's distinctive civil-law history to the UCC debate.

Taken together, these cases suggest that Indian personal-law reform has not followed a single judicial formula. Courts have used constitutional rights, statutory interpretation and

principles of legal consistency in different factual settings.

19.UTTARAKHAND UNIFORM CIVIL CODE

The Uniform Civil Code, Uttarakhand Act, 2024 is a significant contemporary example of state-level civil-law reform. It addresses areas including marriage, divorce, succession and live-in relationships.

The Uttarakhand framework is important because it moves the debate from constitutional theory to legislative implementation. It raises practical questions concerning registration, documentation, administration, remedies and the interaction between civil regulation and privacy.

The official framework also provides exclusions for Scheduled Tribes and certain constitutionally protected customary groups. This demonstrates that even a UCC may contain differentiated application where constitutional and social considerations require it. The Rules framed in 2025 provide an additional administrative framework. Continuing constitutional scrutiny of aspects of the scheme makes Uttarakhand a useful case study rather than a final answer to the national debate.

20.COMPARATIVE AND INTERNATIONAL PERSPECTIVE

Different countries address the relationship between religion and family law in different ways. Some jurisdictions have comprehensive secular civil codes, while others maintain plural systems in which religious communities have separate family-law rules.

The comparative lesson is that there is no single universal model of civil-law uniformity. Legal systems reflect constitutional structure, historical development, demographics and political institutions.

India's approach must therefore be evaluated within its own constitutional framework. Comparative experience can provide ideas concerning registration, civil marriage, inheritance equality and procedural safeguards, but foreign models cannot simply be transplanted without considering India's constitutional guarantees and social diversity.

21.CONSTITUTIONAL MORALITY AND PROPORTIONALITY

Constitutional morality refers broadly to fidelity to constitutional principles including equality, liberty, dignity, fraternity and rule of law.

In personal-law reform, constitutional morality should not be used as a general formula

for eliminating every traditional difference. It should be applied through concrete constitutional analysis.

The proportionality principle provides a useful framework. A restriction should pursue a legitimate objective, have a rational connection to that objective, be necessary in the circumstances and maintain an appropriate balance between the objective and the burden placed upon rights.

For example, if legislation requires registration of a family relationship, the State should identify the purpose of registration, determine whether the information required is necessary, and provide safeguards for privacy and misuse.

This method can help reconcile constitutional objectives with individual rights and religious freedom.

22. PROPOSED FRAMEWORK FOR PERSONAL-LAW REFORM

A balanced reform framework may include the following principles:

1. Constitutional Supremacy: Every personal-law rule must operate subject to the Constitution.
2. Substantive Equality: Reform should address unjustified disadvantage rather than merely requiring identical language.
3. Individual Autonomy: Individuals should remain independent constitutional rights-holders.
4. Religious Freedom: Genuine religious practices should receive protection subject to constitutional limitations.
5. Proportionality: State restrictions should be justified and proportionate.
6. Gender Justice: Equal legal capacity and remedies should be secured irrespective of sex.
7. Child Protection: Family-law reform should prioritise the rights and welfare of children.
8. Democratic Consultation: Major reform should involve meaningful consultation with affected groups.
9. Accessibility: New laws should be understandable to citizens and practitioners.
10. Effective Remedies: Rights should be supported by accessible courts, mediation and legal aid.
11. Periodic Review: Legislation should be reviewed after implementation using

evidence concerning its effects.

12. Gradual Harmonisation: Where immediate comprehensive uniformity creates implementation concerns, reform can proceed through successive areas of family law.

23.FINDINGS

First, Article 44 is a constitutional directive rather than a self-executing command. It does not itself provide the text or structure of a UCC.

Second, personal laws are subject to constitutional scrutiny, although the precise basis of scrutiny depends upon the rule and rights involved.

Third, equality, dignity and autonomy are central to contemporary family-law reform.

Fourth, religious freedom remains constitutionally significant where reform affects practices connected with religious belief.

Fifth, judicial decisions show that reform may occur through targeted statutory interpretation, constitutional review and legislative intervention rather than only through comprehensive codification.

Sixth, gender justice requires examination of inheritance, maintenance, marriage, divorce, guardianship and other family-law consequences.

Seventh, the Uttarakhand experience demonstrates that practical administration of a UCC raises questions beyond the abstract principle of uniformity.

Eighth, consultation and proportionality are important safeguards for legitimate pluralism and individual rights.

24.RECOMMENDATIONS

1. Create a clear constitutional statement of the objectives of any personal-law reform.
2. Undertake extensive consultation before nationwide legislation.
3. Identify and remove unjustified gender discrimination across all communities.
4. Ensure equal inheritance and property rights subject to constitutionally permissible distinctions.
5. Protect individual autonomy in marriage and family decisions.
6. Ensure that registration systems do not impose disproportionate privacy burdens.
7. Provide accessible family courts and legal-aid mechanisms.
8. Use civil remedies where appropriate and avoid unnecessary criminalisation.

9. Provide carefully reasoned exemptions where constitutionally necessary.
10. Establish independent review mechanisms to evaluate implementation.
11. Publish clear guidance and model forms for citizens.
12. Consider progressive harmonisation where comprehensive uniformity is not immediately practicable.
13. Ensure that reform applies consistently as a matter of constitutional principle rather than targeting a particular religious community.
14. Conduct periodic legislative review based on evidence and court experience.

25.CONCLUSION

The debate over personal laws and the Uniform Civil Code is ultimately a debate about the relationship between diversity and constitutional citizenship.

India's Constitution accommodates religious and cultural diversity while establishing equality, liberty, dignity and fraternity as foundational values. Article 44 expresses the constitutional aspiration towards a common civil code, but its implementation must operate within the broader constitutional structure.

The Supreme Court's decisions demonstrate that personal laws are not beyond legal reform. At the same time, religious freedom and cultural identity cannot simply be disregarded when civil legislation is designed.

A constitutionally sustainable approach should therefore avoid treating either complete uniformity or complete legal separation as an automatic answer. The more fundamental task is to identify unjustified inequalities, protect individual autonomy, preserve legitimate religious freedom, and establish common minimum standards of justice.

The Uttarakhand UCC provides an important contemporary case study, but its experience also demonstrates that legislation must be assessed through constitutional rights, administrative practicality, privacy and judicial review.

The future of personal-law reform in India may therefore depend less upon the abstract question of whether law should be uniform and more upon the quality of the rights, safeguards, procedures and constitutional reasoning contained in the reform.

A balanced framework based on constitutional supremacy, substantive equality, gender justice, individual autonomy, religious freedom, proportionality, consultation and gradual implementation can provide a principled basis for future reform.

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APPENDIX I – CASE-LAW QUICK REFERENCE

Case	Year	Central issue	Relevance
Shah Bano	1985	Maintenance	Interaction between secular maintenance law, personal law and Article 44
Sarla Mudgal	1995	Conversion and second marriage	Personal-law conflict and discussion of Article 44

Danial Latifi	2001	Rights of divorced Muslim women	Constitutional interpretation of statutory protection
John Vallamattom	2003	Christian succession	Secular aspects of personal law and equality
Shayara Bano	2017	Talaq-e-biddat	Constitutional scrutiny of a specific personal-law practice
Jose Paulo Coutinho	2019	Goa succession	Common civil framework and Article 44 discussion

APPENDIX II – CONSTITUTIONAL PROVISIONS RELEVANT TO PERSONAL-LAW REFORM

Article 14: Equality before law and equal protection of laws.

Article 15: Prohibition of discrimination on specified grounds including religion and sex.

Article 21: Protection of life and personal liberty.

Article 25: Freedom of conscience and freedom to profess, practise and propagate religion, subject to constitutional limitations.

Article 26: Rights of religious denominations, subject to constitutional limitations.

Article 29: Protection of interests of sections of citizens having a distinct language, script or culture.

Article 37: Directive Principles are not enforceable by courts but are fundamental in governance.

Article 44: State shall endeavour to secure a Uniform Civil Code throughout India.