



# Criteria for Legal Validity of Live-in Relationships in India: How courts determine legitimacy and rights bases on duration, intent, and cohabitation

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## ABSTRACT

*Live-in relationships have come to represent a major social reality in contemporary India, defying traditional understandings of family and marriage. Even though not statutorily codified as such in Indian law, the judiciary has exercised a determinative influence in charting the legal boundaries of such relationships by establishing whether they are valid and what rights derive from them. This essay critically analyses the standards used by Indian courts to determine the validity of live-in relationships based on three key parameters: length of cohabitation, the intention of the partners to cohabit as partners, and the character of their cohabitation. The research uncovers the ways in which courts have sanctioned prolonged unions that are akin to marriage-like unions while rejecting short-term or informal arrangements as non-marital in character. Duration serves as an important benchmark, indicating stability and seriousness of the relationship. Equally important is the intent of the parties—whether they intended to share life as husband and wife or merely engaged in a temporary companionship. The courts have also considered social acceptance, financial and emotional*

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*interdependence, and public recognition as supplementary factors in determining validity. Rights emanating from such recognition are protection of women under Domestic Violence Act, maintenance rights, legitimacy and inheritance rights of the children, and protection from exploitation. The lack of overarching legislation still produces legal uncertainty, notably in the areas of succession, property rights, and applicability uniformly across personal laws. Through examination of landmark cases like S. Khushboo v. Kanniammal (2010) and Indra Sarma v. V.K.V. Sarma (2013), the paper highlights the imperative for a uniform legal regime that harmonizes social realities with constitutional values of equality and dignity. Finally, it contends that legal certainty in live-in relationships is crucial to ensuring justice, safeguarding vulnerable partners, and evolving Indian family law to suit modern social changes.*

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## 1 Introduction

Live-in relationships, commonly referred to as cohabitation without marriage, have become an increasingly visible social reality in India. With rapid urbanization, globalization, and changing social values, more couples choose to live together outside the traditional institution of marriage. While socially contentious, such relationships have gradually entered the legal discourse, particularly in cases concerning the rights of women, legitimacy of children, and property disputes.

The Indian judiciary has been at the focal point in formulating the legal legitimacy of live-in relationships. In contrast to the west, India lacks a law that addresses live-in unions, leaving uncertainty in acknowledging such relationships. Courts then use principles of justice, constitutional principles, and precedents in determining whether a specific live-in relationship should be afforded protection equivalent to that of marriage.

Three fundamental considerations—duration of cohabitation, parties' intention, and character of cohabitation—have turned out to be central in deciding legitimacy. Courts have underlined that cohabitational relationships approximating marriage need to be differentiated from fleeting or casual contacts. Such differentiations have proved to be pivotal in maintenance cases under the Domestic Violence Act, children's right of inheritance, and safeguarding women from exploitation.



This article discusses the way Indian courts have understood live-in relationship validity and resultant rights. It also identifies challenges thrown up by the lack of codified legislation and proposes legislative specificity. Based on landmark judicial rulings and changing social attitudes, the research attempts to add depth to the continuing debate between reconciling individual liberty, social mores, and constitutional protection in contemporary Indian society.

### **1.1 Background of Live-in Relationships in India**

Historically, Indian culture has positioned marriage in the middle of family and society life, viewing it as a legal agreement and a divine bond. In such a cultural environment, the concept of couples cohabiting without being married has frequently been seen as being against social and moral principles. Nonetheless, globalization, modern urban culture, and shifts in the mindsets of the youth generation have slowly altered the attitudes towards relationships and families.

The idea of live-in relationships emerged in India in the late 20th century, almost exclusively in urban areas where exposure to western culture and economic independence fostered alternative styles of living. Live-in relationships came to be linked with personal autonomy, personal choice, and defiance of strict societal expectations. Although there is increasing acceptance in some quarters of society, live-in relationships remain stigmatized in rural and conservative society, where marriage remains the socially accepted form of union.

Legally, live-in relationships were a "grey area" for years. Lacking statutory recognition, issues regarding legitimacy, rights, and protection became matters of judicial consideration. Courts had to deal with matters like: Can women in live-in relationships claim maintenance as per law? Are children born out of such relationships legitimate? Can live-in partners inherit property? These issues became important as the number of such cases grew.

Judicial interventions led to slow clarification. The Protection of Women from Domestic Violence Act, 2005, was a landmark piece of legislation that incorporated "relationships in the nature of marriage" under its purview. This extended the legal protection cover to areas such as women facing abuse or abandonment in live-in relationships. Landmark judgments such as *S. Khushboo v. Kanniammal* (2010) and *Indra Sarma v. V.K.V. Sarma* (2013) also solidified the law that live-in relationships are not illegal and should be protected if they are similar to a stable marriage union.

Therefore, the history of live-in relationships in India is one of gradual improvement from social disapproval to some recognition in law. The dilemma continues to be to balance respect for personal autonomy and safeguarding vulnerable partners in such relationships.

## 1.2 Evolution of Social and Legal Perspectives

The development of live-in relationships in India reflects wider societal changes. Socially, younger generations, particularly in cities, increasingly see live-in relationships as a convenient option, combining companionship with the lack of binding obligations of marriage. This is indicative of more stress on personal freedom, gender equality, and career goals, where conventional marriage seems constricting. Social acceptance, however, remains patchy, with rural and traditional communities still regarding cohabitation outside marriage as stigmatizing.

Legally, the Indian judiciary has played an important role in establishing recognition of live-in relationships. The courts were initially hesitant to give them legal recognition in the absence of statutory provisions. Judicial attitudes gradually changed to meet social realities. The milestone came with the Domestic Violence Act, 2005, which conferred the status of "relationship in the nature of marriage." The provision enabled women within live-in relationships to claim protection and maintenance in case of abandonment or domestic violence.

Later judgments further extended this interpretation. Courts ruled that long-term shared living, common intention to live as partners, and open recognition of the relation could bring it within the purview of a valid union. Notably, children born out of these relations were declared legitimate and given rights of inheritance, further strengthening the acknowledgement of live-in partnerships as socially and legally significant.

Thus, the development of attitudes demonstrates an incremental balancing act between constitutional principles of equality, dignity, and liberty and traditional notions of morality. Indian law is gradually recognizing live-in relationships as part of contemporary family lifestyles, even though complete societal recognition remains far away.

## 1.3 Aims of the Study

- To analyze the legal parameters applied by Indian courts in legitimizing live-in relationships.
- To examine the role of duration, intent, and nature of cohabitation in establishing legitimacy.
- To examine the rights of women and children emanating from such relationships.

- To examine judicial precedents and their effect on legal interpretation.
- To determine challenges and ambiguities due to lack of codified law.
- To recommend policy and legislative suggestions for more explicit regulation.

## 1.4 Scope and Limitations

### Scope:

- Concentrates on judicial interpretation of live-in relationships in India.
- Analyzes statutory provisions, including the Domestic Violence Act, 2005.
- Uses analysis of landmark judgments of Supreme Court and High Courts.
- Analyzes rights of women, children, and property matters.
- Considers social perceptions that shape legal rulings.

### Limitations:

- Lack of specific legislation limits the analysis to judicial precedents.
- Research is confined to the Indian legal and social sphere.
- Empirical evidence regarding prevalence of live-in relationships is limited.
- Does not incorporate comprehensive comparative analysis with foreign countries.

## 2. Conceptual Framework

### 2.1 Definition of Live-in Relationship

A live-in relationship is a situation in which two persons, most commonly of the opposite gender, decide to live together in a long-term monogamous relationship that is similar to marriage but without any formal legal solemnization. Unlike casual dating, a live-in arrangement implies shared living quarters, emotional and economic interdependence, and mutual commitment.

There is no statutory definition of live-in relationships in Indian legal parlance. The courts, though, have tried to define them as "relationships in the nature of marriage." The Supreme Court in *Indra Sarma v. V.K.V. Sarma* (2013) explained that such a union should manifest the elements of a settled marriage-like relationship, such as living together, household responsibilities being shared, social acceptance, and an intention to live as husband and wife. Therefore, the definition undergoes development through case law and not statute law.

## 2.2 Legal Recognition vs. Social Perceptions

The legal status of live-in relations in India is influenced by the tension between legal recognition and public attitudes. From a legal perspective, courts have increasingly tended to acknowledge live-in relationships to protect the rights of women and children. For example, for women living in such relationships, protection can be claimed under the Protection of Women from Domestic Violence Act, 2005, if the relationship is "in the nature of marriage." Moreover, children born out of such live-in relationships have been recognized as legitimate and are accorded inheritance rights under Indian law.

Socially, though, live-in relationships remain stigmatized, particularly in rural and traditional societies where marriage is the only institution of union acceptable to society. Cohabitation in a state of wedlock is frequently identified with immorality or westernization. This disconnect between legal protection and social acknowledgment generates practical challenges: women can be reluctant to come to court, families might object, and courts occasionally must resist moral pressure in decision-making. The law, therefore, advances towards rights protection while societal attitudes are polarized.

## 2.3 Comparative Perspective: Live-in Relationships in Other Jurisdictions

Worldwide, live-in relationships have been met with varying levels of acceptance.

- **United States:** "Common law marriage" is acknowledged by many states if the couple cohabits for a specified period of time with the intention of marrying. It confers rights akin to marriage regarding inheritance, property, and maintenance.
- **United Kingdom:** Cohabitation is legislatively recognized but does not inherently confer marital rights. Statutes confer rights on partners regarding children, accommodation, and finances.
- **France:** The Pacte Civil de Solidarité (PACS) legally recognizes civil unions between cohabiting couples, granting them rights similar to marriage.
- **Australia:** The Family Law Act recognizes "de facto relationships," allowing cohabiting partners to claim property settlements and spousal maintenance.

In comparison to these jurisdictions, India does not have a codified statutory regime for live-in relationships. Recognition is patchy, judicially at the mercy of interpretation. Although courts have protected rights in certain spheres, India has not yet formulated detailed legislation along the lines of foreign examples.

### 3. Literature Review

#### 3.1 Judicial Interpretation and Legal Analysis

1. Karun Sanjaya (2022) – "Live-in Relationships in India: A Legal Analysis" discusses how Indian courts have dealt with live-in relationships in the lack of a codified legislation. The chapter follows judicial jurisprudence regarding live-in partnerships and contrasts marriage with cohabitation, pointing out how courts deduce intent and stability from factual matrix.
2. Sharma (2022) – "Judicial Approach Amidst Growing Live-in Relationship" examines Supreme Court and High Courts' judgments between 2010-2021 and explores how judges perceive "relationships in the nature of marriage" as per the Protection of Women from Domestic Violence Act, 2005, particularly with respect to cohabitation, social acceptance, and duration.
3. AS Prakash (2023) – "Legal Conundrum of Live-in Relationship in India" canvases judicial and scholarly discourse after 2005, observing the absence of legislative definition and the courts' recourse to constitutional rights (Article 21) and precedents for safeguarding cohabiting couples and children.
4. "Live-in Relationships in India: A Comparative Study with an International Perspective" (2024) – The paper compares Indian cultural and judicial reactions with other jurisdictions and contends that Indian courts are increasingly filling the legislative void through incremental jurisprudence, albeit with patchy results.

#### 3.2 Socio-Legal and Policy Perspectives

5. Exploring Live-in Relationships in Modern Indian Society (Civil Law Journal, ~2023-24) – The work discusses changing attitudes in city India, the stigma that continues to attach to cohabitation, and the gap between social norms and judicial decisions. It also cites public recognition and economic interdependence as informal signs of relationship validity.
6. Socio-Legal Dynamics of Live-in Relationships in India (2023/24) – Concerned with cohabitation patterns and how couples mediate the absence of formal legal status. It implies that, in practice, live-in partners establish quasi-marital roles and expectations, which in turn shape judicial evaluations of validity and rights.
7. Live-in Relationship in India: A Socio-Legal Study (Shraddha, ~2023) – Chronicles the lived realities of cohabiting couples in Indian cities, legal ambiguities facing them, and the judicial



pronouncements' role in providing protection, particularly in case of domestic violence and abandonment.

8. *Live-in Relationships and Women* (2023) – This piece looks at the gendered aspect of live-in relationships, particularly how women tend to bear the burden of legal uncertainty and how courts' acknowledgment under the Domestic Violence Act completes a lacuna of protection.

9. *The Evolving Concept of Marriage and Live-in Relationship and Its Implications*" (2025) – Examines the live-in relationship as a substitute for conventional marriage, influenced by globalization and value changes, and explores the judicial-psychosocial balance that courts attempt to achieve in passing judgments. *ijahr*

10. *"Legal Recognition and Rights of Live-in Partnerships"* (2024) – This article chronicles Indian case law since 2015, critically examines the protection available to live-in partners (maintenance, relief from domestic violence, legitimacy of children), and urges legislative change to minimise ad hoc judicial patchwork.

### **3.3 Challenges, Ambiguities and Future Directions**

11. *"The Breakdown of Live-in Relationships in India: Legal Recognition and Consequences"* (IJLMH, ~2022-23) – Examines what occurs when live-in relationships collapse, particularly where there has been no express restitution or settlement. Reveals that courts frequently have difficulty enforcing post-relationship remedies where there is no manifest intent or express agreement, particularly over property or support.

12. *"Critical Analysis of the New Trend of Live-in Relationship"* (IOSR Journal of Multidisciplinary Research, 2025) – Discusses the increase in live-in relationships, criticizes "westernization" accounts, and highlights that courts more and more weigh basic rights (such as Article 19 and Article 21) against public morality to grant legitimacy to long-term cohabitation.

13. *"Live in Relationship in India A socio-legal study"* (IJIRT, 2018) – One of the earlier systematic mixed-method studies after 2015. It combines empirical interviews with judicial review, tracing out how cohabiting couples view their own relationships and how courts actually judge them on the basis of duration, intent, and stability.



## 4 Research Methodology

### 4.1 Study Design

The research has a descriptive and exploratory study design. The aim is to analyze how Indian courts evaluate the legal legitimacy of live-in relationships in terms of duration, intent, and cohabitation. Both primary and secondary data analysis are enabled through the design to emphasize social and legal insights.

### 4.2 Population and Sample Size

Population: Law students, legal professionals, and those in live-in relationships in Indian cities.

- **Sample Size:** 100 respondents (50 law students/professionals + 50 respondents who are aware of/experiencing live-in relationships).
- **Sampling Technique:** Purposive sampling, since the research demands respondents with some knowledge of the legal system.

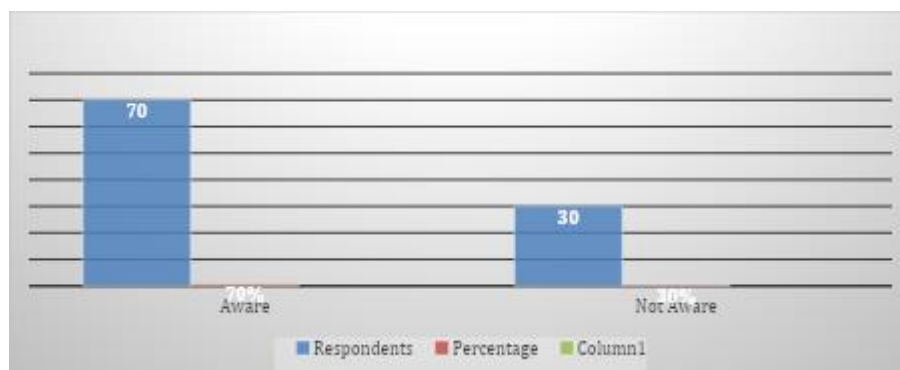
### 4.3 Instruments of Data Collection

- **Primary Data:** Structured questionnaire (close-ended and open-ended questions).
- **Secondary Data:** Landmark case laws, journal articles, and legal commentaries after 2015.

## 5 Data Analysis

**Table 1: Awareness of Legal Recognition of Live-in Relationships**

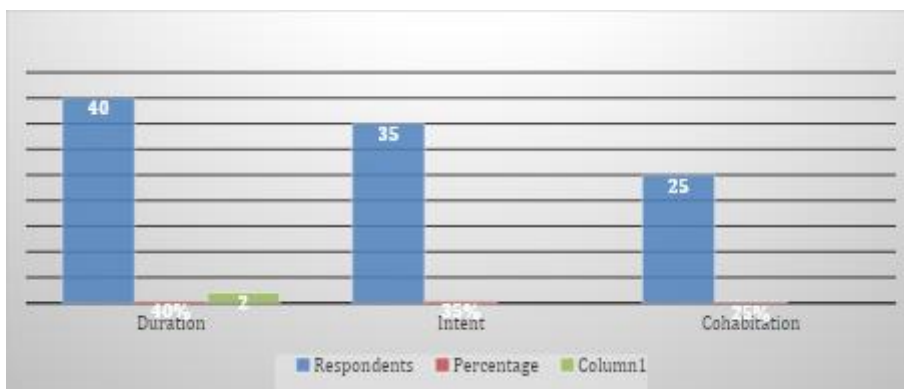
Awareness Level	Respondents	Percentage
Aware	70	70%
Not Aware	30	30%



Interpretation: A majority (70%) of respondents are aware of legal recognition of live-in relationships, showing growing awareness, especially among urban youth and law students.

**Table 2: Factors Considered Important for Legal Validity**

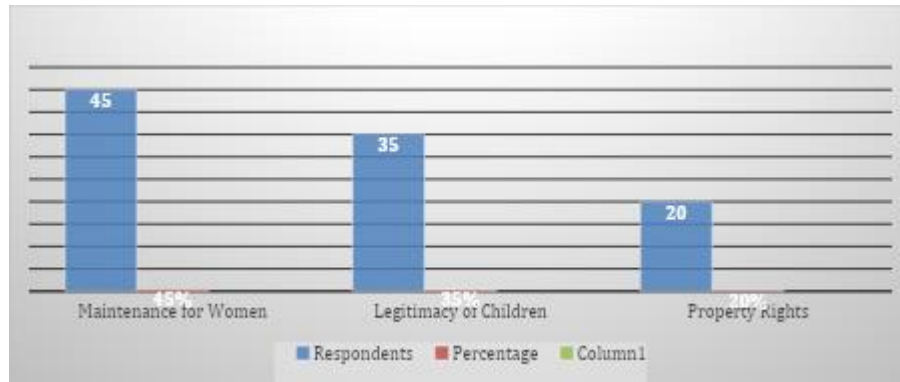
Factor	Respondents	Percentage
Duration	40	40%
Intent	35	35%
Cohabitation	25	25%



Interpretation: Duration of relationship is viewed as the strongest factor in determining legal validity, though intent (35%) and cohabitation (25%) are also significant.

**Table 3: Rights Recognized by Respondents in Live-in Relationships**

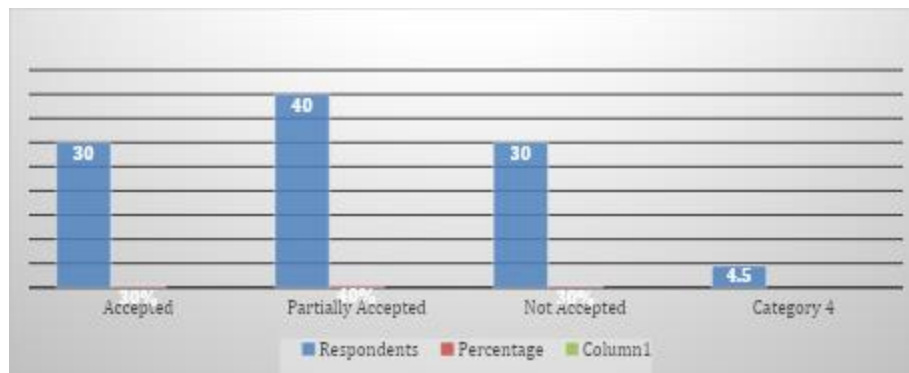
Rights Recognized	Respondents	Percentage
Maintenance for Women	45	45%
Legitimacy of Children	35	35%
Property Rights	20	20%



**Interpretation:** Respondents believe maintenance and legitimacy of children are widely recognized rights, whereas property rights are still uncertain.

**Table 4: Social Acceptance of Live-in Relationships**

Acceptance Level	Respondents	Percentage
Accepted	30	30%
Partially Accepted	40	40%
Not Accepted	30	30%



**Interpretation:** Social acceptance remains divided—only 30% fully accept live-in relationships, while 70% show hesitation or rejection, reflecting societal conservatism.

## 6. Discussion

The results identify a gap between legal and social attitudes towards live-in relationships in India. As courts actively protect women's and children's rights, social stigma continues, especially in conservative communities. The most important aspect for legitimacy is duration, which indicates that long-term stability impacts both legal and social acceptance. Maintenance and legitimacy of the child were



emphasized as the most important rights by respondents, demonstrating legal consciousness influenced through salient cases. Yet, uncertainty in inheritance and property rights remains to stifle complete recognition.

## 7. Conclusion

The research concludes that while live-in relationships are increasingly accepted by Indian courts, social acceptance is confined. Cohabitation, intent, and duration are central requirements of legality. The judiciary has been proactive, yet lack of codified law opens room for ambiguity. Awareness is building among educated youth, indicating incremental normalization in urban India.

## 8. Suggestions

- **Codification of Laws:** Parliament must pass a uniform law that enunciates rights in live-in relationships.
- **Awareness Campaigns:** Legal literacy campaigns are necessary to eliminate stigma and educate citizens about rights.
- **Gender Protection:** More effective protections against abandonment and exploitation of women are necessary.
- **Property & Inheritance:** Definite provisions must be made for securing partners' and children's property rights.
- **Judicial Consistency:** Courts must use standard criteria to eliminate judicial confusion in verdicts.

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