

# A Critical Analysis of Dowry Prohibition Act 1961 And its Efficacy

Milan Khatri \* & Dr.Laxman Singh Rawat \*\*

\*Student LLM 2 Semester, Law College, Uttranchal University, Dehradun

\*\*Assistant Professor, Law College, Uttranchal University, Dehradun

Received: January 28, 2019

Accepted: March 08, 2019

**ABSTRACT:** *The existing studies paper makes a try to analyze the dowry-associated offences under the Dowry Prohibition Act, 1961. It makes a critical analysis of judicial activism, a new improvement, in freeing women inside the modern submit-current era , it is additionally offers with the legal guidelines associated with dowry and their effectiveness viz. segment 498-A and phase 304-B of Indian Penal Code which offers tooth to the Dowry Prohibition Act, 1961. Strangely our scheme of Indian charter remains ineffective because the socio-cultural norms associated with the exercise of dowry have remain unaffected, for this reason, the practice of give and receive dowry maintains as such. Even in any other case law surviving citizens are give and receive dowry. Further, the exact object of this paper is to examine the socio-academic profile of sufferers of dowry offences and relate it to the socio-cultural exercise of dowry to good enough to perform social recognition and schooling is essential, along with the legal punishment with evil practice.*

**Key Words:** : Dowry, Feminism, offence , legislation, punishments, etc.

## 1. INTRODUCTION

The social evil of dowry is deep rooted in our society. The offences of dowry, dowry-death, dowry murder dowry-suicides, demand of dowry are the shocking crimes devoted in opposition to the womens. Womens in all societies are the transmitters of the past civilization and background of their human beings. From womb to tomb, women's are made to pay dearly for their maturity, and except a few steps are taken to make humans respect. Discrimination of women's starts with their birth. Womens are the supreme award of God to humanity. She has the power to create what is right and wrong what's unpleasant. Women produce children; womens are moms and better halves; women to do the cooking, wending, stitching and wash they take care of man and are small to gentleman authority; they are largely debarred from far above the ground position occupations and from position of his status in the family. These generalization apply, to some quantity to almost every regard human society.

India the second highest population united states of the stadium incorporate women as half of its total population. Womens of ancient India, specially for the duration of the Vedic and Indus Civilization, received a unbelievable Devine honor and had been worshipped as goddess as part of society she used to carry out her impartial role, as she was known as greater prominence in choice-making within the social institutions. Even going with the aid of the superb epics we discover that the placement of women changed into not most effective on par with that of mens, however it changed into an authoritative one. Politically women stood on the identical footing as that of fellows regardless of the reality that. Man and women are each identical and both play critical roles within along with development in their households specifically and the society in fashionable. Manushastra had accorded a very low status to women. Later on gradually her position slipped into the abyssal depths that deprived her of self-governing social, economic and political and thereby made her reliant on the male member of her family.<sup>1</sup>

Undoubtedly the conflict for crime equality has been one of the important worries of the women's movement all over the world. In India, on account that drawn out lower back, ladies have been considered as the broken segment of the society and that they were disregarded for centuries. At some stage in the country it is a wide conflict for Independence. About this Gandhi ji gave opinion about independency of womens he says that- "I am uncompromising inside the be counted of women's rights. The distinction in sex and physical shape denotes no distinction in reputation. Female is the complement of man, and not inferior". For this reason, the primary task in submit-independent India changed into to offer a charter promises to

1 J . Krishna murthy, Women in colonial India-Essay on survival, work and state. Oxford University Press (1989), Kumkum Sangari and Suresh Vaid ,Recasting Women: Essay in colonial History ,Kali for Women(1989)

cozy to all its citizens with Justice-social, financial and political. So, what is needed for women in India is gender fairness which entail cease of bias against them and making sure them equality of fame, chance and rights, equal opportunity earlier than regulation and equal safety of regulation, while at the equal time having regard for his or her gender-particular needs. A glimpse of Radical Feminism is visible inside the topics of sexual slavery inside marriage, rape legal guidelines, prostitution, feticides, dowry dying and so on. Those attitudes had been meditated in various articles. Empowerment of womens are approach to equip womens to be economically fair and self behind in a society wherein they act as economic vendors and take part in all developmental sports like men. It is habitually stated that the fame and responsibility of women in society is satisfactory way to recognize civilization. Empowerment of women and their centenary party with guys in all walks of existence and spheres of action. Of all styles of discrimination in society, gender-based discrimination is the most interesting and that is due to the fact of this discrimination which isn't on the premise of racial starting place or economic status or ethnic identity.

## 2. VIOLENCE AGAINST WOMEN IN INDIA

This discrimination is primarily based on social production of organic differences. A consequences and effect of any form of discrimination is violence. Violence against womens could be very a superior quality to deal with uncontrolled in our society. Violence in opposition to womens is a made from social values, social popularity of womens, and crime protection that womens it is said that maturity of a civilization is thought from the respect of womens to get in that civilization. Speakme of Indian society, the reputation of women right here is not something we can show off about it. The issues related to women are being raised and discussed in various flora in the recent times. Of these violence against women' is gaining more and more support and gratitude the world over. But despite the passing of laws, formulation of reformative legal processes, condition of legal aid to the needy, wide use of the provision of Public Interest Litigation, conduct of Family Courts, Women/Family counseling centers, etc., women in India has a long way to go in concretizing their Constitutional goal into truth.<sup>2</sup> Dowry deaths also are end consequence ones of exchange, historically dowry is destined to be a present Marriage is a dating among two households, and it was no see from an economic perspective. However as social values misused human beings urbanized a extra consumerist mind-set. Aspirations for higher financial fame caused groom to insist for a dowry. Dowry have become a method to an give up: higher economic circumstance, and as a result higher fame in thrilling to observe is that as rapid social exchange takes vicinity, social values exchange. The offence of Dowry-deaths, Dowry-murders, Dowry suicides, demand of dowry and are the dreadful crimes devoted in opposition to the women. These offences have created an environment of insecurity for women inside the society. Amongst all communities Hindu network is the maximum affected one. Dowry has unfold like a catching ailment and now assumed alarming proportions. Women who is called the better 1/2 of man or ardhangani, is clutch in the shake of dowry. A woman is below her husband control and for the duration of antique age, below her son. He taken into consideration that women must to in no way be unfastened. Mens have to dominate over womens. Hindu marriage is considered a self-punishment. Dowry has been in life since lengthy and it turned into taken into consideration as one of the function of Indian Marriage.

## 3. CONCEPT OF DOWRY

1. Dowry or Dahej is the price in coins or/and type by using the bride's own relations to the bridegroom's circle of relatives along with the freely giving of the bride (known as Kanyadaan) in Indian marriage. Kanyadanam is a crucial a part of Hindu conjugal rites. Kanya means daughter, and Dana method present.

2. A dowry (also called trousseau) is the cash, items, or property that a women brings to her husband at the time of marriage. It contrast with Bride value is paid to the bride's parents, and dower, that is possessions established at the bride herself by the groom on the time of marriage. The same lifestyle may arise at the same time exercise by both dowry and bride rate. Dowry is an historic custom, and its existence can also properly predate information of it.

3. Dowry (Dahej/Hunda) as all of us recognize is paid in cash or type by way of the bride's circle of relatives to the groom's circle of relatives in conjunction with the giving away of the bride (Kanya-dana). The ritual of Kanya-dana is an vital thing in Hindu marital rites. Kanya=daughter, Dana=present.

<sup>2</sup> B.R. Sharma, Department of Forensic Medicine and Toxicology ,Govt. Medical College and Hostpita,B,Sector-32B, Chndigarh,160030,India.

Dowry tool in Indian Marriages may be called the economic thing of the wedding. The practice of giving dowry curved into very not unusual amongst every person of all international locations. A woman receives all the home utensils that are important to installation a own family. Dowry device in India turned into widespread because the Vedic length. In Epic period gifts from parents, brothers and relatives and relatives were known as women's property- stridhan. Problem is not any greater restricted to 1 or 2 states or north Indian states but win roots in the soil of Southern in addition to eastern states too. The main problem is that it is made to all sections, lessons, castes, societies and communities. It accepted even to tribal societies known for ancient equality and gender equality and to Muslim community too. Strong legislation, legal guidelines and ladies's actions, every try and face up to it has been dissatisfied by the extensive social authorize accorded to this unlawful practice.

Roots of dowry date lower back to the time while guy commenced dwelling a civilized existence. Firstly it meant simply to offer a support and security to new couple who start their married lifestyles. It also signified an opportunity to legacy for woman. During periods of time it distorted its face and however its worst face involves the fore in present society wherein dad and mom pass their complete existence underneath debt to pay dowry in the marriages in their daughters which also results in murders and suicides of the daughters. Rising of dowry demise toll in recent years displays the harshness of the trouble. Reasons behind large dowry demands are counted by means of specialists mainly the death of economic rights of female, denial of belongings rights and simple civil rights which includes right of marriage of personal preference, land rights and training. Social thinker set up also works behind it including in Indian society ladies are taken into consideration a legal responsibility while mens as asset. Culturally sons are favored. This accords a secondary social popularity to women. Its miles considered that dowry device changed into facilitated by way of economic liberalization. surprising upward thrust in dowry instances is also related to the rising consumerist tradition and in keeping with the document of (AIDWA), All India dowry workers association, and the herbal tendency of human to have easy get entry to to the consumer goods which was brought on by way of the numerous selections of customer goods to be had within the marketplace. Sensitive incidents of dowry may be attributed to the converting economic shape of society consequent social polarization.

Dowry is not the best trouble of Indian society, connected to it's far the complete bunch of corresponding evils. worldwide girls's conference in Australia conventional that woman feticide is directly associated with dowry. Center and decrease middle income companies who are not able to satisfy the call for of dowry suppose it clever to nip within the bud. Domestic violence is every other consequence of this evil. This gigantic problem persists even after centuries, is mainly because stringent laws on my own cannot convey trade at degree of mentality of humans for that mass movement desires to be initiated. Mass recognition is to be created. Hundreds of dowry deaths are closed as just kitchen injuries or suicides. Around 40% women married happen to be under eighteen years of age and illiterate as a consequence now not in function to say themselves. Their voice remains unheard in society. Dowry is created by upper caste families as the wedding gift to the bride from her family. The dowry turned into shortly given to assist with marriage fees and became a shape of insurance within the case that her in-legal guidelines mistreated her. Despite the reality that the dowry was officially prohibited in 1961, it continues to be surprisingly institutionalized. The groom regularly sharp that would virtually assist them and save you them from taking such excessive steps as taken by means of and should also take a lead on this path. The commission need to, however, be endowed with statutory powers and authority to carry the culprits of dowry crimes to book and offer good enough to dowry sufferer.

#### **General law(Indian Penal Code, 1860)**

**304B. Dowry Death-** (1). Where the death of a woman is caused by any burn or bodily injury or occurs otherwise then under normal circumstances within seven years of her marriage and it is shown that soon before her death she was subjected to cruelty or harassment by her husband or any relative of her husband for, or in connection with, any demand for dowry, such death shall be called "dowry death", and such husband or relative shall be deemed to have caused her death.

(2). Whoever commit Dowry death shall be punished with imprisonment for a term which shall no be less than seven years but which may extended to imprisonment for life.<sup>3</sup>

***The offence of dowry death in Section 304B, IPC does not fall into the categories of the offences for which death penalty has been provided in the Penal Code. Dowry death is different from the offence of murder. The death of a bride may fall under both the categories of offences, namely, murder and dowry***

<sup>3</sup> Indian Penal Code 1860 sec 304 B

*death, in which case, a death sentence may be awarded for committing the offence of murder in appropriate cases depending upon the facts and circumstances of each case.*<sup>4</sup>

**Causing miscarriage-** Whoever voluntarily caused a woman with child to miscarry, shall, if such miscarriage be not caused in good faith for the purpose of saving the life of the woman, be punished with imprisonment of either description for a term which may extend to three years, or with fine, or with both; and, if a woman be a quick with child, shall be punished with imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine.

Explanation---A woman who causes herself to miscarry, is within the meaning of this section.<sup>5</sup>

**354. Assault or criminal force to women with intent to outrage her modesty:-**Whoever assaults or uses criminal force to any women, intending to outrage or knowing it to be likely that he will thereby outrage her modesty, shall be punished with imprisonment of either description for a term which may extend to two year, or with fine, or with both.<sup>6</sup>

**498A. Husband or relative of husband of a woman subjecting her to cruelty:-**Whoever, being the husband or the relative of the husband of a woman, subject such woman to cruelty shall be punished with imprisonment for a term which may be extend to three year and shall also be liable to fine.

#### **4. CRUELTY IN MARRIAGE:**

##### **Cruelty is enumerated under Section 498-A in the Indian Penal Code:**

There has been an evident unnecessary accusation of more than one person within cases.<sup>7</sup> This may be due to the fact that the definition allows for wide interpretation and can be seen as an easy opportunity. A burden of requirement of proof needs to be imposed on the party that allows for only certain cases to be accepted. Since the number of cases being accepted into courts is the reason for ineffectiveness, it may be suggested to permit allowance forailable, cognizable cases that are compoundable with permission of courts. There should also be punishment for parties in case of proven misuse of this section.

In the 237<sup>th</sup> Law Commission Report, planned to add **sub-section (2A) to Section 320 CrPC**. The future condition will ensure that the offer to compound the offence is voluntary and free from pressures and the wife has not been subjected to ill-treatment after the offer of compounding. Incidentally, it underscore the need for the Court playing an active role whereas dealing with the application for compounding the offence under Section 498-A.<sup>8</sup>

##### **Section 509 : Word, gesture or act intended to insult the modesty of a woman**

Whoever, intend to insult the modesty of any woman, utters any word, makes any sound or gesture, or exhibits any object, intending that such word or sound shall be heard, or that such gesture or object shall be seen, by such woman, or infringes upon the privacy of such woman, shall be punished with simple imprisonment for a term which may extend to one year, or with fine, or with both.<sup>9</sup>

#### **5. The Commission of Sati (Prevention) Act, 1987**

The Commission of Sati (Prevention) Act of 1987 Part I, Section 2(c) defines Sati as:

The burning or burying alive of –

(i) Any widow along with the body of her deceased husband or any other relative or with any article, object or thing associated with the husband or such relative; or

(ii) Any woman along with the body of any of her relatives, irrespective of whether such burning or burying is claimed to be voluntary on the part of the widow or the women or otherwise.

The act of sati is said to survive willingly from the existing accounts, many of these acts did certainly occur willingly. The act may have been expected of widows in some community and the extent to which social pressures or outlook constitute compulsion has been much debated in modern times. There were also instance where the wish of the widow to commit sati was not welcomed by others, and where hard work were made to prevent the death. Usually a person's funeral would have occurred within a day of the death, requiring decisions about sati to be made by that time. When the husband died elsewhere, the widow might still die by immolation at a later date.

<sup>4</sup> 202 law commission report: Proposal to amend section 304 B of IPC

<sup>5</sup> Indian Penal Code 1860 sec 312

<sup>6</sup> Indian Penal Code 1860 sec 354

<sup>7</sup> 243 law commission report sec 498 of IPC ,2012

<sup>8</sup> 237 Law commission report: Compounding of (IPC) Offences (2011).

<sup>9</sup> Indian Penal Code 1860 Sec 509

Sati often emphasized the marriage between the widow and her deceased husband. For instance, rather than mourning clothes, the to-be sati was often dressed in marriage robes or other finery. In the preliminary of the related act of Jauhar (or Saka), both the husbands and wives have been known to dress in their marriage clothes and rebuild their wedding ritual, before going to their separate deaths.

Accounts describe many variants in the sati ritual. The majority of accounts describe the woman seated or lying down on the funeral pyre beside her dead husband. Many other accounts describe women walking or jumping into the flames after the fire had been lit, and some describe women seating themselves on the funeral pyre and then lighting it themselves.

The Commission of Sati (Prevention) Act, 1987, says, "...sati or the burning or burying alive of widows or women is revolting to the feelings of human nature and nowhere enjoined by any of the religions of India as an imperative duty." If the offender survives, she gets a one-year jail term and a fine. Those who abet sati "either directly or indirectly, shall be punishable with death or imprisonment for life or shall also be liable to fine." Act of abetment include "making a widow or woman believe that ...sati would result in some spiritual benefit to her or her deceased husband or relative... encouraging a widow or woman to remain fixed in her resolve to commit sati; preventing or obstructing the widow or woman from saving herself from being burnt or buried alive".

### 6.The Dowry (Prohibition) Act, 1961:

As per **section 2** of the Dowry Prohibition Act 1961

"Dowry" means any property or valuable security given or agreed to be given either directly or indirectly"

(a) By one party to a marriage to the other party to the marriage, or

(b) By the parent of either party to a marriage or by any other person, to either party to the marriage or to any other person, at or before ... or any time after the marriage ... in connection with the marriage of the said parties.<sup>10</sup>

In the case of **Soni devraj Bhai Babar Devraj Bhai v. State of Gujrat**<sup>11</sup> supreme cited the observation of Pt. Jawahar Lal Nehru to show the role of legislation in dealing with the dowry as a social evil as follows: legislation cannot by itself normally solve this deep rooted social problem. In the above case the supreme court observed that the social evil of dowry has been the bane of Indian society and continues to persist in spite of dowry has been the bane of Indian society. Yet the legal sanctions in the form of its prohibition and punishments are some steps in that direction. Thus, the Dowry Prohibition Act 1961 has been made to achieve these goals.

### Stridhan

Stridhan is, generally speaking, what a woman can claim as her own property within a marital household. It may include her jewelry (gifted either by her family or by her in-laws), gifts presented to her during the wedding or later, and the dowry articles given by her family.

Gifts given by the parents of the bride are considered "stridhan", i.e. property of the woman, traditionally representing her share of her parent's wealth

In the case of **Bhai Sher Jang Singh vs. Smt. Virinder Kaur**<sup>12</sup> The Punjab and Haryana high court had ruled that groom's side is bound to return back all the items including ,property, ornaments, money, and others belongings offered by bride's side at the time of marriage. The court found that the Bhai Sher Jang Singh and his family have committed an offence under sec 406 of IPC by committing criminal breach of trust by the ornaments and others where the stridhan and were entrusted to her husband for safe custody and which he has dishonestly used.

**Section 4** of the said Act says that,

4. Penalty for demanding dowry- If any person demands, directly or indirectly, from the parents or other relatives or guardian of a bride or bridegroom, as the case may be, any dowry, he shall be punishable with imprisonment for a term which shall not be less than six months, but which may extend to two years and with fine which may extend to ten thousand rupees. Provided that the Court may, for an adequate and special reason to be mentioned in the judgment, impose a sentence of imprisonment for a term of less than six months.<sup>13</sup>

**Section 3** of the Act, both the giver and the receiver are sought to be punished.

Penalty for giving or taking dowry- Section 3 re-numbered as sub-section

<sup>10</sup> Dowry Prohibition Act 1961 sec2

<sup>11</sup> AIR 1991 , 28 August.

<sup>12</sup> AIR 1979 Cri. L J 493

<sup>13</sup> Dowry Prohibition Act 1961 sec 2



(1) If any person, after the commencement of this Act, gives or takes or abets the giving or taking of dowry, he shall be punishable with imprisonment for a term which shall not be less than five years, and with fine which shall not be less than fifteen thousand rupees or the amount of the value of such dowry, whichever is more

Provided that the Court may, for adequate and special reasons to be recorded in the judgment, impose a sentence of imprisonment of a term of less than five years

. (2) Nothing in sub section (1) shall apply to, or in relation to,

(a) Presents that are given at the time of a marriage to the bride (without any demand having been made in that behalf).

(b) Presents which are given on the time of a marriage to the bridegroom (without any demand having been made in that behalf).

provided that such affords are entered in a listing maintained according with the policies made below this Act, complete in addition that where such affords are made by using or on behalf of the bride or any character associated with the bride, such offers are of a standard nature and the fee thereof is not immoderate having regard to the financial fame of the individual by using whom, or on whose behalf, such presents are given. This Act prohibit the request, payment or taking of a dowry, "as consideration for the marriage", where "dowry" is defined as a gift demanded or given as a precondition for a marriage. Gifts given without a precondition are not considered dowry, and are legal. Taking or giving of dowry can be punished by an imprisonment of up to six months, or a fine of up to Rs. 15,000 or the amount of dowry either is higher and imprisonment up to 5 years. It replace several piece of anti-dowry legislation that had been enacted by various Indian states.

***In the case of Rani v. State of NCT of Delhi***<sup>14</sup> The High Court of Delhi- Hon'ble Mr. Justice Shiv Narayan Dhingra held that of demanding of Rs.50,000/- and scooter were vague in nature- Whether it was done by husband, mother-in-law or father-in-law. Answers to all these questions are absent Ingredients of **Section 304B** IPC were totally absent. Unnatural Death can be called a dowry death only if after making a demand made by accused is not fulfilled by perpetuation of cruelty upon the victim. The list of dowry show that both parties belonged to poor strata of society. No evidence, whatsoever was collected by police about the real facts. Every suicide after marriage cannot be presumed to be a suicide due to dowry demand. The tendency of the court should not be that since a young bride has died after marriage, now somebody must be held culprit and the noose must be made to fit some neck.

### **Protection of women from domestic violence act**

Domestic Violence remains one of the most prevalent yet largely invisible forms of violence. Contrary to the general belief, Domestic Violence is not controlled to certain social sections. Domestic Violence occurs in many forms- physical, emotional, sexual, economic, verbal etc. Woman faces Domestic Violence as a daughter, sister, wife, mother, or a partner in her lifetime. As per the NCRB Report 2003, 36.1% of the total reported crimes against women relate to domestic violence. As per NFHS (2) 1998-99, 1 in 5 married women in India experience domestic violence from the age of 15. Prior to Protection of Women from Domestic Violence Act (PWDV) Act 2005, under the civil law, for acts of domestic violence a married woman can initiate proceeding for divorce/ judicial separation. However, this fails to provide any kind of immediate relief and protection to the woman. She remains at the mercy of her parents/ relatives. Also it leads to problems of costs and delays in litigation. Most commonly used provision of criminal law in dealing with cases of Domestic Violence is Section 498A of the Indian Penal Code. It makes cruelty to a wife by her husband or relatives an offence and attracts a maximum punishment of three years on conviction. Limitation of this provision is that it is not aimed at providing reliefs, namely maintenance, shelter, etc. It is confined to the prosecution and possible conviction of the offender. The Protection of Women from Domestic Violence Act 2005 was brought into force by the Indian government from October 26, 2006. The Act was passed by the Parliament in August 2005 and assented to by the President on 13 September 2005. As of November 2007, it has been ratified by four of twenty-eight state governments in India; namely Andhra Pradesh, Tamil Nadu.

### **7.Conclusion**

In keeping view with Hindu mythology, marriages are made in heaven , though mother-in-law, sisters-in-law, husbands and different respected ones are being an increasing number of worried within the breaking of the marriage for the lust of dowry. Dowry dying, murder, suicide, and bride burning are signs and

<sup>14</sup> AIR 23 February HC ,2015 <http://indiankanoon.org/doc/125875321/> Accessed on 9march 2019.

symptoms of strange social problem and are an unlucky development of our social set up. At some stage in the previous couple of decades India has witnessed the black evils of the dowry failure system in a greater sharp shape in almost all parts of the us of a considering that it's far practised by means of nearly every section of the society. it is almost a remember of day -to-day occurrence that not most effective married ladies are careworn, humiliated, overwhelmed and forced to devote suicide, depart husband, and so on., tortured and sick treated but lots are even burnt to death because mother and father are not able to satisfy the dowry demands of in-legal guidelines or their husbands. It's miles quite obvious that the brand new family member can also have little volition to exercising and in the sort of situation cannot regard her personal matters to be hers. Such remedy finds roots within the traditional Hindu perception that children are the 'assets' in their parents accordingly, together with the son, his bride is also treated as the assets of the family in which the dowry she brings is applied as consistent with the desires of the in -legal guidelines and in maximum instances for marrying their daughter, leaving the bride completely on the mercy of the husband and his race. Very frequently dowry is seem as greater essential than the women herself. Modest idea is given to her procreative strength which appeared to have been the unique basis of marriage. She is an increasing number of being considered as a practical tool of collecting routine wealth and fortune.

**8. Suggestion:** The need of the hour is to replace hatred, greed, selfishness and anger through mutual love, trust and know-how and if ladies were to get hold of schooling and end up economically independent, the possibility of this pernicious social evil dying its herbal loss of life won't be a dream.

As regards the implementation of the dowry prohibition legal guidelines, it's miles frequently alleged that anti-dowry rules is observed extra in breach than in implementation. Be that as it could, however the reality remains that dowry being a socio-legal problem, it cannot be tackled by using regulation alone unless participants of the society come ahead and actively cooperate with the law-enforcement corporations to impede this menace. There's also want to create social focus and mobilise public opinion in opposition to dowry thru an in depth educational programme in any respect degrees, particularly inside the rural pockets.

---