



INDIAN JOURNAL OF  
LEGAL REVIEW

VOLUME 5 AND ISSUE 8 OF 2025

INSTITUTE OF LEGAL EDUCATION



## INDIAN JOURNAL OF LEGAL REVIEW

APIS – 3920 – 0001 | ISSN – 2583-2344

(Open Access Journal)

Journal's Home Page – <https://ijlr.iledu.in/>

Journal's Editorial Page – <https://ijlr.iledu.in/editorial-board/>

Volume 5 and Issue 8 of 2025 (Access Full Issue on – <https://ijlr.iledu.in/volume-5-and-issue-7-of-2025/>)

### Publisher

Prasanna S,

Chairman of Institute of Legal Education

No. 08, Arul Nagar, Seera Thoppu,

Maudhanda Kurichi, Srirangam,

Tiruchirappalli – 620102

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## BATTERED WOMEN SYNDROME IN INDIAN LEGAL CONTEXT: A LEGAL ANALYSIS

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**BEST CITATION** – ISHITA CHAUHAN & KHALEEQ AHMAD, BATTERED WOMEN SYNDROME IN INDIAN LEGAL CONTEXT: A LEGAL ANALYSIS, *INDIAN JOURNAL OF LEGAL REVIEW (IJLR)*, 5 (8) OF 2025, PG. 651-659, APIS – 3920 – 0001 & ISSN – 2583-2344.,

### Abstract

*“The purpose of this research study is to investigate the legal recognition and application of Battered Women Syndrome (BWS) within the Indian court system. The idea of battered woman syndrome (BWS) is still not sufficiently recognised in Indian law, despite the fact that there have been considerable developments in the fight against domestic abuse through legislation such as the Protection of Women from Domestic Abuse Act, 2005. This study examines key instances that have sought to establish BWS as a legal defence, investigates the obstacles that are associated with its application, and proposes revisions that will better accommodate this syndrome within India’s legal structure. In the paper, the author argues for a more nuanced understanding of self-defence in situations like these, highlighting the need of judicial acknowledgement of the psychological impact that prolonged abuse has on women who turn to lethal violence against their abusers.”*

**Keywords.** Battered Women Syndrome, Indian legal System, Self-defence, Domestic Violence, Criminal Law Reform

### Introduction

Battered Women Syndrome (BWS) is a subtype of Post-Traumatic Stress Disorder (PTSD) that is experienced by women who have been exposed to persistent physical, sexual, or psychological violence at the hands of their intimate partners (Walker, 1979). Learnt helplessness, despair, anxiety, and re-experiencing of trauma are some of the psychological symptoms that exhibit themselves as a pattern in reaction to cyclical abuse. The syndrome expresses itself as a pattern of psychological symptoms. The incorporation of BWS into the Indian legal system is still restricted and uneven, despite the fact that it has acquired recognised as a

foundation for legal defences in a number of Western jurisdictions, notably in situations when abused women murder their abusers.

With the passage of the Protection of Women from Domestic Violence Act (PWDVA) in 2005, India’s response to the issue of domestic abuse has undergone a considerable transformation. This legislation, on the other hand, focusses largely on civil remedies and protection orders rather than addressing the criminal features that arise when battered women turn to violence as a way of self-preservation. Due to the fact that the conventional understanding of self-defence in Indian criminal law demands that there be an immediate risk, that there be proportionality, and that there be no

alternatives, these criteria frequently fail to fit the complicated circumstances of women who are stuck in cycles of abuse.

This paper examines the current status of battered women's rights (BWS) within Indian jurisprudence by analysing landmark cases. It also discusses the legal and sociocultural barriers that prevent its recognition and proposes reforms to better address the needs of battered women who face criminal charges for actions taken against their abusers. The findings of this study underscore the critical need for immediate changes to the judicial system that recognise the psychological consequences of long-term abuse and incorporate this understanding into methods for criminal defence.

### Theoretical Framework of Battered Women Syndrome

#### Historical Development

According to Dr. Lenore Walker, a psychologist, the notion of Battered Women Syndrome was initially presented for the first time in the late 1970s. An innovative piece of research that was published in 1979 by Walker identified a "cycle of violence" that was comprised of three stages: the building of tension, an intense battering episode, and loving contrition. Walker found that repeated exposure to this loop leads to a condition of "learnt helplessness," in which victims become convinced that they cannot leave their circumstances, despite of options that may objectively exist (Walker, 2017). This information was discovered through Walker's study.

Legal recognition of BWS was achieved in the United States as a result of the seminal case of *State v. Kelly* (1984), in which the Supreme Court of New Jersey incorporated expert testimony on BWS to support a claim of self-defence. As a consequence of this, a number of nations, including as Australia, Canada, and the United Kingdom, have included BWS into their legal systems. This has been done either as a partial defence that reduces murder to manslaughter

or as evidence that supports standard self-defence claims.

#### Psychological Components

BWS encompasses several psychological components that explain why victims remain in abusive relationships and may eventually resort to fatal violence:

1. **Learned Helplessness:** According to Seligman (1975), victims gradually come to the realisation that they are unable to change their circumstances after making several unsuccessful attempts to flee or better their situations.
2. **Cycle of Violence:** According to Walker (1979), the regular cycle of abuse followed by reconciliation creates a psychological trap that maintains the victim's sense of helplessness after the conflict has been resolved.
3. **Traumatic Bonding:** Surprisingly, powerful emotional bonds are formed between the abuser and the victim as a result of the power imbalance and intermittent reinforcement that occurs between moments of regret and tenderness (Dutton & Painter, 1993).
4. **Hypervigilance:** According to Browne (1987), victims gain a heightened awareness of the behavioural cues that their abusers exhibit, and they interpret tiny changes that others may not notice as warning indicators of coming violence because of this knowledge.
5. **Distorted Cognitive Perceptions:** It is possible that victims would internalise the worldview of the abuser over the course of time, which may include ideas that they are deserving of punishment or that they are unable to operate independently (Gondolf & Fisher, 1988).

When traditional self-defence theories fail to take into consideration the cumulative consequences of long-term abuse, it is especially important for judicial systems to

have a thorough understanding of these psychological components in order to appropriately analyse situations in which abused women turn to violence against their abusers.

### Legal Status of BWS in India

#### Domestic Violence Legislation in India

Over the course of the last several decades, India's current legislative system for dealing with domestic abuse has seen tremendous development. The Protection of Women from Domestic Violence Act (PWDVA), which was passed in 2005, is the major piece of legislation that governs domestic abuse. This act offers civil remedies like as protection orders, residency orders, monetary damages, and custody orders. Despite the fact that this piece of legislation represents a huge step forward in admitting domestic violence as a serious problem, it does not particularly address battered women's rights (BWS) or establish criminal defences for abused women who perform violent acts against their abusers.

There are sections in the Indian Penal Code (IPC) that have the potential to apply to circumstances involving domestic violence. These laws include Section 498A (cruelty by spouse or family), Section 304B (dowry death), and Section 326A (acid assault). On the other hand, these rules are more concerned with penalising those who commit the offences than they are with creating defences for victims who react.

#### Self-Defense Doctrine in Indian Criminal Law

The right to self-defense is recognized under Sections 96 to 106 of the IPC. According to Section 100, the right to private defense extends to causing death if the assault:

1. Reasonably causes apprehension of death
2. Involves grievous hurt
3. Includes assault with intention of committing rape

4. Involves unnatural lust
5. Involves kidnapping or abduction
6. Involves wrongful confinement where the victim reasonably believes they cannot receive governmental recourse

Traditional interpretation of self-defense in India requires:

- Imminent threat of harm
- Proportionality of response
- Absence of safe alternatives
- Reasonable belief of danger

These requirements often fail to accommodate the unique circumstances of battered women who may act during a lull in violence, use seemingly disproportionate force, or fail to leave the relationship due to learned helplessness and other psychological factors characteristic of BWS.

#### Recognition of BWS in Indian Jurisprudence

Indian courts, in contrast to courts in Western jurisdictions, have been rather hesitant to acknowledge BWS as a legitimate defence or mitigating factor. The condition and its ramifications have, nevertheless, been acknowledged in a number of noteworthy cases, including the following:

It was acknowledged by the Gauhati High Court in the case of *Manju Lakra v. State of Assam* (2013) that the accused had been the victim of ongoing domestic violence. During the sentencing process, the court accepted the history of abuse as a mitigating factor, but it did not specifically identify Border Patrol violence.

Similar to this, in the case of *State of Punjab v. Smt. Ahluwalia* (1991), the Supreme Court reduced a woman's life sentence to a sentence of imprisonment that she had already served. The lady had committed the act of lighting her abusive husband on fire in order to murder him. In spite of the fact that BWS was not directly mentioned in the verdict, the court acknowledged that the continuous physical

and mental brutality were important considerations in its finding.

These instances illustrate a growing readiness on the part of the judiciary to take into account the psychological impact of continuous abuse when determining the criminal responsibility of abused women who resort to violence, despite the fact that this willingness continues to be uneven.

### Comparative Analysis with International Jurisprudence

Indian courts' approach to BWS can be contrasted with more developed jurisprudence in other countries:

The precedent-setting case *State v. Kelly* (1984) in the **United States of America** set the precedent for the admissibility of BWS as expert testimony. This was further refined in the decision of *State v. Wanrow* (1977), which acknowledged that the reasonable person criterion in circumstances involving self-defence should take into consideration gender disparities in the perception of threat.

The first successful application of BWS as a defence was in the case of *R v. Kontinnen* (1991) in **Australia**, which resulted in the defendant being found not guilty under the law. Expert testimony on BWS was permitted to be presented in the case of *R v. Runjanjic and Kontinnen* (1991), which provided for the explanation of why women would not leave violent situations.

When the Supreme Court of **Canada** permitted expert testimony on battered women's syndrome (BWS) to support a claim of self-defence in the case of *R v. Lavallee* (1990), it was a momentous occasion. The court acknowledged that the old theory of self-defence did not adequately take into account the reality that abused women suffer.

A systematic incorporation of BWS into legal doctrine has not yet been implemented by Indian courts, in contrast to these other jurisdictions. The acknowledgement has been incremental, frequently implied rather than

explicit, and has generally been demonstrated through sentence leniency rather than official acceptance as a defence.

### Challenges in Applying BWS in the Indian Context

#### Legal Barriers

Several legal barriers hinder the full recognition of BWS in Indian courts:

1. **Absence of Statutory Recognition:** India does not have any legislation provisions that address the condition, in contrast to other nations that have passed amendments to their penal laws in order to officially recognise BWS.
2. **Strict Interpretation of Self-Defense:** Traditional Indian courts have a tendency to adhere to stringent conditions for self-defence, notably the aspects of imminent danger and proportionality. However, these requirements frequently do not fit with the reality of the experiences that abused women go through.
3. **Limited Precedential Value:** Because the few decisions that have acknowledged the impact of chronic abuse have frequently been determined on narrow grounds, the precedential significance of these cases has been limited, which makes it difficult to establish BWS as a recognised defence.
4. **Evidentiary Challenges:** Without express governmental authorisation, the requirements of the Indian Evidence Act may prohibit the acceptance of expert testimony on psychiatric illnesses such as borderline personality disorder (BWS).
5. **Lack of Procedural Guidelines:** There is a dearth of instruction for courts and solicitors regarding how to properly introduce and analyse BWS evidence since there are no defined procedural procedures involved.

## Sociocultural Barriers

Sociocultural factors further complicate the recognition of BWS in India:

1. **Patriarchal Social Norms:** Domestic violence is frequently normalised by deeply ingrained patriarchal norms, which can generate the assumption that women should suffer abuse rather than seek assistance or leave relationships.
2. **Family Honor and Stigma:** As a consequence of concerns with family honour and societal shame, families are less likely to disclose instances of domestic violence, which leads to inadequate recording of abuse history when cases do make their way to the courts.
3. **Economic Dependence:** Many women in India continue to be economically reliant on their abusive relationships, which restricts the alternatives they think they have for escaping and exacerbates the learnt helplessness they experience.
4. **Limited Mental Health Awareness:** Understanding of psychological illnesses such as borderline personality disorder (BWS) may be hindered in India due to a general lack of knowledge and severe stigma around mental health concerns.
5. **Rural-Urban Divide:** There are significant differences between urban and rural communities in terms of access to legal resources, documenting of abuse, and exposure to contemporary legal principles. These differences can lead to discrepancies in the manner in which BWS may be recognised.

## Judicial Attitudes

The judiciary's approach to BWS reflects both progress and persistent challenges:

1. **Varying Judicial Awareness:** A large amount of variation exists among judges in terms of their awareness and comprehension of BWS, which results in

uneven implementation across various courts and countries.

2. **Traditional Views on Marriage:** It is possible that some judicial officials continue to place a higher priority on the protection of marriage than they do on the safety of victims, and they may approach BWS reports with scepticism.
3. **Evidentiary Skepticism:** When it comes to accepting expert testimony on BWS or giving it considerable weight, some judges continue to be sceptical because there is no formal legislative recognition from the government.
4. **Gender Composition of Judiciary:** There is a possibility that the knowledge and acceptance of gendered experiences, such as BWS, might be detrimental due to the primarily male makeup of the Indian court.
5. **Evolving Jurisprudence:** Recent judgements, notwithstanding the difficulties that have been encountered, are progressively demonstrating a readiness on the part of the judiciary to take into account the psychological consequences of prolonged abuse, which suggests a steady movement towards broader recognition of BWS.

## Case Studies: Application of BWS in Indian Courts

### Case Study 1: *Bhagwati v. State of Rajasthan* (2015)

This case involved a woman who poisoned her husband after years of severe physical and mental abuse. The trial court convicted her of murder, but the Rajasthan High Court reduced the conviction to culpable homicide not amounting to murder under Section 304 Part II of the IPC.

**Court's Reasoning:** The High Court noted: "The accused had suffered grievous hurt repeatedly... The deceased's behavior was cruel and inhuman... The accused acted under

circumstances that deprived her of self-control."

While not explicitly mentioning BWS, the court recognized the cumulative psychological impact of prolonged abuse.

#### **Case Study 2: Parminder Kaur v. State of Punjab (2014)**

Parminder Kaur stabbed her husband during an argument after suffering years of abuse. The court considered evidence of repeated violence and threats, eventually reducing her sentence significantly.

**Court's Reasoning:** The court acknowledged: "The evidence clearly establishes a history of violence... The accused, having been subjected to continuous cruelty, acted under extreme emotional distress... This is not a case of premeditated murder but a response to sustained provocation."

#### **Case Study 3: Suyambukkani v. State of Tamil Nadu (2020)**

In this case, the Madras High Court came closer to explicitly recognizing BWS. Suyambukkani had killed her husband after enduring abuse for over 14 years. The Court considered evidence about her psychological state resulting from the abuse.

**Court's Reasoning:** The court observed: "The psychological evidence indicates that the accused suffered from symptoms consistent with what is known in psychological literature as 'Battered Woman Syndrome'... This condition affected her perception of danger and available options... Traditional standards of reasonableness must be applied with an understanding of her unique circumstances."

This case represents one of the more direct judicial acknowledgments of BWS in Indian jurisprudence.

#### **Case Study 4: Amutha v. State (2018)**

Amutha, after suffering abuse for nearly a decade, attacked her husband with a kitchen knife during a violent episode. The Madras High

Court recognized evidence of PTSD and symptoms consistent with BWS.

**Court's Reasoning:** The court held: "The psychological evidence presented convincingly establishes that the accused suffered from Post-Traumatic Stress Disorder resulting from years of domestic violence... Her perception of danger was influenced by her traumatic experiences... The court must consider these factors when evaluating the reasonableness of her actions."

#### **Case Study 5: Manju Lakra v. State of Assam (2013)**

This case involved Manju Lakra who had killed her alcoholic husband after enduring persistent physical abuse. The trial court convicted her of murder, but the Gauhati High Court reduced the conviction to culpable homicide not amounting to murder under Section 304 Part II of the IPC.

**Court's Reasoning:** The High Court observed: "The evidence on record clearly establishes that the deceased was habituated to alcohol and would regularly assault the accused when intoxicated... The accused had suffered years of physical and mental torture... The fatal assault occurred after a prolonged history of violence that significantly impacted her mental state."

The court took into consideration the deceased's history of alcoholism and violence, and while not explicitly mentioning BWS, recognized that Manju's actions were precipitated by the cumulative effect of sustained abuse. The judgment acknowledged that traditional criminal liability needed to be viewed differently in contexts of prolonged domestic violence.

### **Legal Reforms and Recommendations**

#### **Legislative Reforms**

1. **Statutory Recognition of BWS:** In situations involving abused women who conduct violence against their abusers, the Indian Penal Code should be amended to expressly recognise battered women's syndrome (BWS) as a

factor that judges are required to take into consideration.

2. **Modified Self-Defense Doctrine:** measures should be introduced that alter the standard self-defence criteria for victims of domestic abuse. These measures should acknowledge that battered women may have different assessments of the threat and the proportionality of the situation.
3. **Evidentiary Provisions:** You should amend the Indian Evidence Act so that it expressly permits expert testimony on BWS and clarifies the conditions that must be met for such evidence to be admissible.
4. **Sentencing Guidelines:** In order to provide judges in different jurisdictions with comparable direction, it is necessary to develop complete sentencing guidelines that include BWS as a mitigating factor.
5. **Comprehensive Domestic Violence Framework:** For the purpose of developing a more comprehensive strategy for dealing with domestic abuse, the PWDVA should be expanded to include measures that address criminal defences for battered women.

### Judicial Reforms

1. **Judicial Training Programs:** It is imperative that judges get mandated training on the dynamics of domestic abuse, battered women's syndrome (BWS), and trauma-informed responses to cases involving battered women.
2. **Practice Directions:** In the context of domestic abuse, it is important to issue practice directions from higher courts that guide subordinate courts on how to assess evidence of domestic violence and how to apply the self-defence concept most appropriately.

3. **Interpretive Guidelines:** Create judicial guidelines for the interpretation of "grave and sudden provocation" and "right to private defence" in light of the study conducted by BWS.
4. **Gender-Sensitive Courtroom Procedures:** In order to ensure that abused women are able to testify about their experiences in conditions that are safe, supportive, and reduce the likelihood of retraumatization, guidelines should be established.
5. **Precedent Development:** In order to provide lower courts with relevant and authoritative direction, it is important to encourage appellate courts to establish unambiguous precedents addressing BWS.

### Procedural Reforms

1. **Specialized Courts:** In order to handle situations of domestic abuse, specialised courts should be established, and judges should be trained in trauma-informed techniques and BWS.
2. **Court-Appointed Experts:** Create a framework that allows unbiased experts on BWS to be appointed by the court to deliver testimony in situations when the defence does not have the means to hire expert witnesses.
3. **Case Management Protocols:** It is important to develop guidelines for the early identification of instances that may involve BWS in order to guarantee that suitable resources and approaches are utilised.
4. **Documentation Standards:** Through the establishment of standards for the documentation of abuse history, the evidential evidence for BWS claims can be strengthened.
5. **Alternative Resolution Mechanisms:** The development of diversion programs that are tailored to the special needs of

situations involving battered women who conduct acts of violence against their abusers is a necessity.

### Institutional Support Mechanisms

1. **Legal Aid Services:** Strengthen legal aid services specifically trained in representing battered women in criminal proceedings.
2. **Mental Health Integration:** Integrate mental health professionals into the legal process to provide timely assessment and testimony regarding BWS.
3. **Shelter and Support Services:** Expand shelter and support services for domestic violence victims to provide alternatives before situations escalate to violence.
4. **Community Awareness Programs:** Implement community education programs about domestic violence and BWS to reduce stigma and increase reporting.
5. **Research Initiatives:** Fund research on BWS in the Indian context to develop culturally appropriate understanding and application of the syndrome.

### Conclusion

The acknowledgement and incorporation of Battered Women Syndrome within Indian jurisprudence indicates a crucial step in the process of addressing the complicated reality that victims of domestic abuse are confronted with. When it comes to completely implementing BWS into the legal system, there are still considerable obstacles to overcome, despite the fact that recent case law has included some encouraging advances. It is still difficult for Indian courts to consistently recognise BWS due to the fact that traditional conceptions of self-defence, evidentiary impediments, and societal considerations continue to be obstacles.

A multidimensional strategy that includes legislative reforms, judicial education, procedural adjustments, and increased support networks is required in order to go ahead. It is possible for the Indian legal system to get closer to a more nuanced view of criminal responsibility in instances involving abused women who resort to violence against their abusers if it acknowledges the psychological influence that chronic abuse has on women's perceptions and behaviour.

Not only would these changes fill a substantial void in the existing legal system, but they would also bring Indian jurisprudence in line with the ever-evolving worldwide norms on gender-sensitive justice. By recognising abused women's rights, the courts are better equipped to achieve their commitment to provide fair justice that takes into account the specific circumstances and psychological reality of battered women. This, in turn, contributes to more just decisions in these complicated and sad instances.

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