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UNIFORM CIVIL CODE: IN RELATION TO MARRIAGE LAWS IN INDIA

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ABSTRACT

The debate on the Uniform Civil Code (UCC) regarding marriage laws in India is critically analyzed here with an emphasis on the conflict between constitutional equality and religious freedom. It examines the divided regime of personal marriage legislation over Hindus¹⁰⁷⁴, Muslims¹⁰⁷⁵, Christians, and Parsis and the alternative secular regime under the Special Marriage Act, 1954¹⁰⁷⁶. In a doctrinal and comparative legal approach, the research analyzes constitutional provisions, statutory schemes, and judicial pronouncements such as *Shah Bano*¹⁰⁷⁷, *Sarla Mudgal*¹⁰⁷⁸ and *Shayara Bano*. The observations bring to light systemic gender discrimination, non-uniform rights, and the absence of uniformity, all of which compromise constitutional protection under Articles 14, 15, and 21¹⁰⁷⁹. The study also addresses the role of the judiciary, the conservative approach of the Law Commission, and comparative experiences from other pluralist societies. Recommendations entail gradual reforms, consolidation of secular choices, preparing a model uniform marriage code, and assigning priority to gender justice. The paper concludes that even as a UCC's immediate countrywide implementation is politically delicate, the gradual, participative, and consensus-based reforms can balance pluralism with constitutional visions of equality, justice, and secularism.

KEY WORDS - Uniform Civil Code, Marriage Laws, Constitutional Law, Gender Justice, Religious Freedom, Equality, Supreme Court, Secularism, Law Commission, Goa Civil Code.

GRASP - EDUCATE - EVOLVE

¹⁰⁷⁴ Hindu Marriage Act, 1955.

¹⁰⁷⁵ Muslim Personal Law (Shariat) Application Act, 1937.

¹⁰⁷⁶ Special Marriage Act, 1954.

¹⁰⁷⁷ *Mohd. Ahmed Khan v. Shah Bano Begum*, (1985) 2 SCC 556; AIR 1985 SC 945.

¹⁰⁷⁸ *Sarla Mudgal v. Union of India*, (1995) 3 SCC 635; AIR 1995 SC 1531.

¹⁰⁷⁹ Constitution of India, Articles 14, 15, 25-28, and 44.

INTRODUCTION

The Uniform Civil Code has remained one of the most debated points in India's constitutional and political debate. While criminal law or law of contract is applied uniformly throughout the nation, personal laws concerning marriage, divorce, succession, and adoption are mostly regulated by religious custom. The designers of the Indian Constitution were cognizant of the intricacy of changing laws of this nature and thus placed the UCC as a Directive Principle of State Policy under Article 44 and not as a justiciable right. The mention of Article 44 is an expression of the vision of a modern, secular republic in which citizenship, rather than religion, defines the rights and duties of citizens. Yet, the very pluralistic character of Indian society has rendered the adoption of the UCC one of India's most delicate legal reforms.

Marriage, more than any other area, is one where the lack of a uniform code is most sorely felt. Under Hindu law, as codified by the Hindu Marriage Act, 1955¹⁰⁸⁰, marriage is considered both sacramental and contractual, with definite grounds for divorce, maintenance, and nullity. Marriages among Muslims, on the other hand, are subject mainly to uncodified Sharia law and are treated as civil contracts, with special clauses such as polygamy and unilateral divorce (triple talaq, now outlawed). Christian marriages are governed by the Indian Christian Marriage Act, 1872¹⁰⁸¹, and Parsi marriages by the Parsi Marriage and Divorce Act, 1936¹⁰⁸², each with its own formalities, procedure, and grounds for divorce. The Special Marriage Act, 1954, was legislated as a secular option for inter-faith marriages, but it is not utilized on a large scale owing to societal stigma and procedural intricacies.

This diversity, at the expense of religious freedom, results in a fractured system in which constitutional assurances of equality and gender justice are easily undermined. The

women, in especial, are discriminated against, as personal laws inevitably prioritize male superiority, uphold patriarchal domination, and refuse equal rights in marriage and divorce. Attempts at harmonization of these laws by judicial interventions have been made, but because of the lack of a well-developed legislative umbrella, the pace of progress has been uneven and tardy.

The controversy surrounding UCC in marriage laws is thus not just a constitutional or legal matter; it is a socio-political dilemma that goes to the very heart of India's existence as a secular democracy. Supporters believe that a UCC would advance gender justice, streamline legal processes, and enhance national cohesion. Opponents, on the other hand, worry that it would undermine religious liberty and impose massive cultural prejudices on minorities. This study is intended to critically analyze these divergent points of view, concentrating particularly on marriage laws, and determine if there could be a balanced, inclusive, and constitutionally sound structure for a UCC in modern India.

LITERATURE REVIEW

The constitutional provisions—Articles 44, 25–28, and 14–15—offer a robust theoretical framework for the debate over the UCC, but they are plagued by an internal tension between religious autonomy and uniformity. While the Article 44 encourages a uniform code, the coexistence of Articles 25–28 permits personal law pluralism, inducing doctrinal tension. The American scholarship has long pointed to this tension without fully proposing reconciliation mechanisms. My study will bridge this lacuna by postulating a model of harmonisation based on constitutional morality and proportionality analysis, instead of viewing the provisions as unifiable.

Statutory provisions like the Hindu Marriage Act, Muslim Personal Law (Shariat) Act, Christian Marriage Act, and the Special Marriage Act demonstrate fragmentation but also evoke selective uniformity already existing in Indian

¹⁰⁸⁰ Hindu Marriage Act, 1955.

¹⁰⁸¹ Christian Marriage Act, 1872.

¹⁰⁸² Parsi Marriage and Divorce Act, 1936.

law. Prevailing literature tends to critique statutory diversity without exploring the pragmatic possibilities of incremental reforms through legislative changes. My research will fill this gap by identifying the ways in which selective codification (as in SMA, 1954) can act as an intermediary model to UCC without drastic imposition

The judicial decisions—from Shah Bano to Shayara Bano—reflect the judiciary's going back and forth between progressive activism and judicial restraint. Yet, all analyses consider gender justice tales without adequately taking into account the court's constitutional constraints or political repercussions that ensue (e.g., after Shah Bano the passage of the 1986 Act). My paper will carry this question further by critically examining how judicial nudges, when not backed by legislative follow-up, generate uneven results and I will set out a framework for measured judicial intervention.

The official reports and committees, such as the 185th Law Commission Report (2001)¹⁰⁸³ and the 21st Consultation Paper (2018), expose institutional ambivalence. While they acknowledge discrimination in personal laws, they refrain from endorsing a UCC, citing political feasibility. Scholarship here often stops at recording these positions without interrogating whether the commissions' reluctance stems from political pragmatism or genuine doctrinal concerns. My research will interact with these reports critically, illustrating how reform by a rights-based strategy in current personal laws can be an intermediate measure, an interim step towards UCC.

Goa Civil Code is routinely presented as a successful "mini-model" of uniformity, but most of the scholarship overlooks its colonial origins and the fact that it is not absolutely gender-equal (e.g., provisions regarding property rights). By situating Goa as an imperfect but useful experiment, my own research will consider its replicability in other Indian states

with appropriate adjustments, instead of using it as a blanket model.

Looking at case laws, pioneering judgments like Shah Bano and Sarla Mudgal are traditionally touted to have driven UCC forward, but criticism is made of the absence of sensitiveness to minority fears. Narasu Appa Mali continues to protect personal laws from Article 13 testing, but few writings challenge its ongoing relevance. Similarly, decisions like AWAG demonstrate judicial self-restraint, but this is hardly presented as a matter of constitutional design. My essay will integrate these decisions to posit that judicial utterances in themselves cannot bring about uniformity; rather, they need to be supported by a legislative and consultative procedure responding to minority interests at the expense of gender justice.

Lastly, law journals and academic commentation present varied opinions. For example, Shalina Chibber (2008)¹⁰⁸⁴ supports gender equality through UCC but is missing in its contemporary contextualization of recent reforms such as Shayara Bano. M.P. Singh prioritizes legal pluralism but provides limited avenues of reconciliation. Flavia Agnes¹⁰⁸⁵ criticizes UCC as patriarchal but does not adequately explore the possibility of intra-community reforms coexisting with wider codification. The recent EPW commentaries (2023–2025) on Uttarakhand's UCC¹⁰⁸⁶ are timely but technocratically targeted for that state, raising open questions of national adaptability. In turn, Narayan (2024) prioritizes political feasibility but undervalues constitutional jurisprudence. My essay will fill such gaps with the integration of doctrinal, comparative, and socio-legal analysis such that criticisms of UCC are addressed with viable reform options instead of an simplistic "for or against" dichotomy.

¹⁰⁸³ Law Commission of India, *185th Report on the Review of the Indian Evidence Act, 1872* (2001).

¹⁰⁸⁴ Shalina A. Chibber, "Charting a New Path Toward Gender Equality in India: From Religious Personal Laws to a Uniform Civil Code," *Indiana Law Journal* 83, no. 2 (2008). Available at: reposit

¹⁰⁸⁵ Flavia Agnes, Hindu Men, Monogamy and Uniform Civil Code, *ECON. & POL. WKLY.*, Sept. 30, 1995, at 3239, <https://www.epw.in>

¹⁰⁸⁶ Uniform Civil Code in Uttarakhand, *ECON. & POL. WKLY.* (2025), <https://www.epw.in>

BODY

The UCC debate in India finds its most pointed articulation in the realm of marriage legislation. Marriage, being both a social and legal institution, is where religion, culture, and state regulation meet. Marriage in India, as compared to much of the rest of the law, has traditionally been an area within the ambit of personal laws that vary between religious communities. Hindus are regulated by the Hindu Marriage Act, 1955; Christians by the Indian Christian Marriage Act, 1872; Parsis by the Parsi Marriage and Divorce Act, 1936; and Muslims chiefly by uncodified Sharia rules complemented by selective statutory interventions. The Special Marriage Act, 1954 offers a secular alternative, but its low level of acceptance illustrates the extent of social opposition to interfaith or secular marriages. This disjunctive system of matrimonial law produces not only inconsistencies in remedies and rights but also constitutional issues related to equality, gender justice, and secularism.

The absence of uniformity becomes particularly problematic when laws of marriage are examined using the test of fundamental rights. Article 14 of the Indian Constitution promises equality before the law and equal protection of the laws, but Article 15 bars discrimination on grounds of religion, sex, or caste. But, the existence of several personal laws negates these promises. For example, Hindu law bars polygamy and declares a bigamous marriage to be void, whereas Muslim law traditionally allowed a man to have four wives. Divorce laws also differ substantially: in Hindu law, causes such as cruelty, desertion, and adultery are accepted, whereas Muslim law traditionally permitted unilateral talaq, a system nullified only more recently by court and legislative action. Christian and Parsi laws have still other procedure requirements. This heterogeneity of matrimonial rights on grounds purely religious translates into the fact that people are not regulated as citizens but as members of religious communities – a scenario diametrically opposite to the constitutional

vision articulated in Article 44, which contemplates a uniform civil code.

The courts have been front-runners in struggling with these paradoxes. In *Mohd. Ahmed Khan v. Shah Bano Begum* (1985), the Supreme Court confirmed the entitlement of a divorced Muslim woman to maintenance under Section 125 of the Criminal Procedure Code, a secular legislation valid for all citizens. The Court regretted the lack of a UCC, stating it was a *sine qua non* for gender justice. Likewise, in *Sarla Mudgal v. Union of India* (1995), the Court had the cases of Hindu men converting to Islam merely to remarry without ending their previous marriage. The Court held such acts as void and again requested the legislature to enact the UCC to stem misuse of personal laws. More recently, in *Shayara Bano v. Union of India* (2017), the Supreme Court struck down instant triple talaq on grounds of being unconstitutional, with the court holding that it was against the fundamental rights of Muslim women. These decisions reflect how the courts have time and again sought to reconcile personal laws with constitutional requirements, but always highlighted that effective reform can only be brought about through legislation.

While judicial decisions emphasize the need for reform, political and legislative responses to the UCC are guarded. The Constituent Assembly did keep Article 44 in the Directive Principles of State Policy on purpose, acknowledging both the desirability of uniformity and the problem of reconciling it with a highly pluralistic society. Subsequent governments have been reluctant to proceed, in case minority communities see the UCC as an imposition of the majority's cultural standards. This concern is not baseless, as critics contend that the UCC debate has tended to be majoritarian in nature, emphasizing Muslim personal law reform and ignoring disparities in Hindu, Christian, and other systems. Scholars such as Flavia Agnes have noted that the Hindu Code Bills of the 1950s were progressive but retained patriarchal structures like unequal property rights that continued until subsequent reforms. The UCC

debate, therefore, has to be understood as a matter not just of uniformity but of quality and comprehensiveness of reforms.

The case of the Goa Civil Code ¹⁰⁸⁷regularly emerges as proof that there can exist successful uniform personal laws in a multicultural society. Goa, thanks to its history of Portuguese colonial rule, has a uniform family law covering all its inhabitants, regardless of religion. The law mandates compulsory registration of marriages, gives men and women equal property rights, and restricts polygamy. Although Goa illustrates the potential for uniformity, it also shows the difficulty of spreading such a pattern across the whole country in light of India's immense cultural, linguistic, and religious diversity. However, it is a viable model for piecemeal reform, implying that regional or sectoral uniformity might be a platform for extending the UCC.

One of the strongest aspects of the UCC controversy is the contradiction between religious liberty and constitutional parity. Articles 25 and 26 of the Constitution ensure freedom to practice and regulate religious matters. The freedom is, however, at the discretion of public order, morality, and health, as well as other basic rights. The pivotal question becomes whether practices like polygamy or exclusionary provisions under divorce can be defended under protection of religion when they distinctly contravene constitutional assurances of gender equality. The courts have acted with discrimination, differentiating between religious practices that are indispensable and those that are secular in nature. For instance, marriage has been dealt with as a social institution with religious connotations as opposed to a purely religious practice, thus rendering it susceptible to state regulation. This differentiation leaves room under the Constitution for the enactment of a UCC, at least in regions where personal laws are patently discriminatory.

The function of the Law Commission of India has been instrumental in framing argument. The 185th Report (2001) and the 21st Law Commission Consultation Paper (2018) both recognized the necessity of reform but took cautious stands. The 2018 Paper expressly declared that a UCC was "neither necessary nor desirable at this stage," suggesting in place reforms to individual personal laws to render them gender-just and non-discriminatory. Though this method is politically considerate, it also has the potential to perpetuate division through its inability to establish a shared framework. Nonetheless, the Commission's conclusions suggest the necessity for gradual, consensual reform over snap imposition.

Overall, the legal analysis on UCC versus marriage laws illustrates that though uniformity is a constitutionally held ideal, its application necessitates sensitivity, inclusiveness, and gradual reform. The judiciary, legislature, and civil society all have important roles to play in this change. Through the process of learning from global experience, borrowing from models such as the Goa Civil Code, and capitalizing on incremental judicial reforms, India can strive for a UCC that is not just legally viable but also socially valid. The task is daunting, but the objective of obtaining equality, justice, and national integration makes it one of the most pressing legal reforms of modern India.

FINDINGS

The study unearths the fact that the existing paradigm of marriage legislation in India is beset with fragmentation, incongruity, and systemic sexism, especially against women. Notwithstanding the vision of uniformity in Article 44 of the Constitution that envisions a Uniform Civil Code, marriage is still regulated by a diversity of laws based on religion, tradition, and custom. This has resulted in an anomaly where citizens in a similar position are entitled to very different rights and duties based exclusively on their religion. Such a system violates the guarantees of equality before the law under Article 14 and against discrimination

¹⁰⁸⁷ Goa Civil Code, 1867 (as retained post-1961 integration of Goa into India).

under Article 15, thus ensuring inequality in one of the most basic social institutions.

One of the key conclusions drawn from this study is the continuity of gender injustice in personal marriage law. Though some reforms have been carried out – including the end of instant triple talaq through the Shayara Bano v. Union of India¹⁰⁸⁸ judgment and subsequent laws – systemic inequalities are embedded. Hindu, Muslim, Christian, and Parsi personal laws have provisions in each that embody patriarchal attitudes, whether in divorce, maintenance, or custodial terms. Women from communities experience structural disadvantage that is contrary to the constitutional promise of gender equality. Judicial actions, while progressive in most instances, have not been adequate to bring about a coherent system of rights since they typically apply in piecemeal fashion and are subject to legislative and political inertia.

Another major discovery is the constitutional tension between Articles 25 and 26, which assure freedom of religion, and Article 44, which promotes uniformity in matters civil. The existence of these provisions alongside each other has created profound tensions in legal and political debate. Courts have sought to settle these tensions by making distinctions between fundamental religious practices, which are deserving of protection, and secular practices, which are open to regulation by the state. Marriage as a social as well as civil institution has traditionally been seen as being in the latter category, thus opening up constitutional space for state action. Yet, in the absence of a legislative initiative, this interpretation has remained undeveloped, leading to continued ambiguity.

The paper also establishes the judiciary's consistent support for the concept of a UCC, especially in those cases where personal laws have been misused to build injustice or legal

confusion. From Shah Bano¹⁰⁸⁹ and Sarla Mudgal¹⁰⁹⁰ to Jordan Diengdeh and Shayara Bano, the Supreme Court has consistently underscored the necessity for a common code for safeguarding the rights of women and avoiding misuse of religious identity for personal motives. But the judiciary has also understood its institutional constraints, as is evident in Ahmedabad Women Action Group v. Union of India¹⁰⁹¹, where the Court left the issue in the hands of the legislature. This two-way trend suggests that though the judiciary understands the immediacy of change, it is the legislature that needs to design and enact a functional UCC.

Another finding is that political reluctance and socio-cultural diversity are still the biggest impediments to the enactment of a UCC. Minority groups, especially Muslim ones, usually see the UCC as a threat to their religious and cultural identity. The political environment has also played its part by generating suspicion, as the UCC debate is often presented in majority terms and not as a gender justice or equality policy. This has hindered consensus formation, in spite of the explicit constitutional mandate. The Law Commission of India, in its 2018 Consultation Paper¹⁰⁹², embodied such caution by stating that a UCC was "neither necessary nor desirable at this stage," and suggesting reforms to personal laws instead. Though pragmatic, this strategy also undermines the constitutional vision of uniformity and postpones overall reform.

Lastly, the study discovers that incremental reforms, judicial activism, and comparative models have prepared fertile ground for the eventual passage of a UCC, but political will and social consensus are still crucial hindrances. The constitutional assurance of equality and gender justice cannot be realized to the fullest

¹⁰⁸⁸ Shayara Bano v. Union of India, (2017) 9 SCC 1.

¹⁰⁸⁹ Mohd. Ahmed Khan v. Shah Bano Begum, (1985) 2 SCC 556; AIR 1985 SC 945.

¹⁰⁹⁰ Sarla Mudgal v. Union of India, (1995) 3 SCC 635; AIR 1995 SC 1531.

¹⁰⁹¹ Ahmedabad Women Action Group (AWAG) v. Union of India, (1997) 3 SCC 573.

¹⁰⁹² Law Commission of India, *Consultation Paper on Reform of Family Law* (2018).

degree without rectifying the inequalities ingrained in personal marriage laws. At the same time, the success of any UCC depends on its ability to balance uniformity with respect for cultural diversity, ensuring that reform does not become synonymous with homogenization. The findings therefore suggest that the pathway to a UCC in marriage laws lies in gradual, inclusive, and consensus-driven reforms that prioritize constitutional values while engaging with the sensitivities of India's pluralistic society.

SUGGESTIONS

Given the outcomes, it is this research's suggestion that the route towards a Uniform Civil Code in the domain of marriage laws should be incremental, participatory, and rooted in constitutional values instead of being dictated as a homogenous solution. The foremost recommendation is to pursue a piecemeal approach toward reform, starting with the harmonization of discriminatory provisions in current personal laws before proceeding towards a common code. For example, such reforms as abolishing triple talaq must be replicated in all communities to eliminate manifestly unequal or oppressive practices towards women. Such incremental reforms, though far from establishing a UCC overnight, would create public confidence and set the stage for broad popular acceptance of uniformity.

Second, the Special Marriage Act of 1954 must be reinforced and streamlined to become a more practical secular option for inter-faith and civil marriages. Currently, formal obstacles and social stigma discourage a large number of couples from using this option. Simplifying registration procedures, shortening waiting times, and providing protection from social backlash would make this Act more popular. In the course of time, as more and more citizens opt for a secular marriage scheme voluntarily, the state can inch toward the idea of a UCC without challenging religious sentiments directly.

The third option is the establishment of a model Uniform Marriage Code, which may be initially made optional instead of being mandatory. This preliminary code, drafted after extensive consultation with legal experts, women's rights activists, religious scholars, and community members, may become a model for those who wish to have a gender-equitable and secular legal code. Enabling individuals to opt for such a code would demonstrate that conformity cannot happen at the cost of religious identity, but as a constitutional exercise of freedom and equality. In time, as the code acquires legitimacy and acceptability, it may develop as a fuller UCC.

Secondly, gender justice has to be the non-negotiable pillar of any reform. The UCC cannot be simply a question of uniformity in form; it has to ensure substantive equality in content. This entails ensuring equal rights for women in divorce, maintenance, custody, and succession within the matrimonial structure. Learned from experiences abroad, especially Tunisia and South Africa, Indian reform needs to be articulated not as cultural imposition but as a widening of women's constitutional rights. By keeping the UCC debate focused on gender justice, not majoritarian uniformity, the state can respond to genuine minority fears.

A second important recommendation is encouraging dialogue and consensus-building through law reform commissions, parliamentary committees, and civil society consultations. The UCC resistance lies as much in political framing and mistrust as it does in legal subtlety. An open process that actively listens to minority participation, comforts communities with their cultural place, and frames uniformity in terms of justice and equality can help diminish resistance. Legal reform should be accompanied by education campaigns and awareness programs in order to build more general public acceptance.

The Goa Civil Code offers a good domestic example of uniform personal law working well. Its direct application on a pan-Indian scale

might be impractical, but the experience in Goa – e.g., compulsory registration of marriages, equal rights in property for men and women, secular regulation of family life – can be carried forward into national reform. Introduction of some of these aspects incrementally, on a state-by-state or issue-by-issue basis, could serve as stepping stones to a pan-Indian UCC.

Lastly, the study implies that the judiciary's role should continue to be that of guidance and not imposition. Courts have aptly emphasized the need for change and invalidated discriminatory acts, but they have also been keenly aware of the fact that law-making belongs to the legislature. Judicial activism thus needs to supplement legislative efforts by interpreting legislations in accordance with the constitutional principles, leaving codification to democratic means. It maintains both legal legitimacy and social acceptability of the reforms.

Overall, the future lies not in an abrupt enforcement of a strict UCC but in a judiciously planned strategy that honors India's diversity and upholds its constitutional promise of equality. By consolidating secular options, eliminating discriminatory practices, preparing a model code, making gender justice a priority, and exploring inclusive debate, India can advance steadily and firmly toward a Uniform Civil Code in marriage laws that is fair and socially viable.

CONCLUSION

The study of the Uniform Civil Code and the laws relating to marriage in India shows that the lack of a uniform system continues to breed inequality, discrimination, and unpredictability in one of the most essential social institutions. Marriage, although strongly grounded in religious and cultural traditions, is a civil institution that also has direct implications for the constitutional rights of citizens, especially women. The existing decentralized system of personal laws vitiates the constitutional promises of equality under Articles 14 and 15, and at the same time generates tensions with

the freedoms of religion under Articles 25 and 26. Judicial judgments in matters like Shah Bano, Sarla Mudgal, Shayara Bano, and others have consistently emphasized the imperative of reform and decried the lack of a UCC. Yet, even as politicians and interest groups have urged implementation, political reluctance, social opposition, and concerns regarding cultural homogenization have forestalled significant legislative action.

The finding of this study is that the Uniform Civil Code is not just a legal change but a revolutionary social initiative that needs to be tackled with care and resolve. An abrupt, rigid imposition of a UCC may alienate minority groups and reinforce suspicion, but incremental and participative reforms can create consensus over time. Consolidating the Special Marriage Act, abolishing discriminatory clauses in personal laws, preparing an optional model code, and positioning gender justice as the non-negotiable centerpiece of reform are pragmatic approaches that serve constitutional goals and accommodate India's diversity. Global and national instances, such as the Goa Civil Code, demonstrate that homogeneity is attainable without destroying diversity.

In the end, the UCC discussion is not about removing religious identity but about making sure that citizenship, and not religion, decides the rights and obligations of people in the area of marriage. The way ahead needs to be steered by the constitutional vision of justice, equality, and secularism so that no citizen is put at a disadvantage by virtue of the personal law they are born with. A Uniform Civil Code, well designed through democratic discussion and piloted in stages, can have the potential to balance individual freedoms with shared constitutional values. It would not only consolidate gender justice and streamline legal procedures but also help achieve national integration by reiterating that all Indians, irrespective of their faith, stand on an equal footing before the law. Hence, although the path to a UCC is complicated and arduous, it is one of the most pressing and essential reforms in



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