
THE LAW ARRIVES TOO LATE: HOW THE CULTURE OF “ADJUSTMENT” NORMALISES MATRIMONIAL ABUSE BEFORE DOWRY DEATHS

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ABSTRACT

Dowry deaths are often treated as sudden tragedies, but they rarely begin with a woman's death. They begin much earlier in the silences she is taught to maintain, the suffering she is expected to tolerate, and the warnings that are repeatedly dismissed as ordinary marital problems. Behind every dowry death is a woman who was told to adjust a little more, endure a little longer, and place the survival of her marriage above her own wellbeing. Marriage is often presented to women as a promise of love, dignity, companionship, and protection. Yet for many women, that promise stands in painful contrast to the realities of dowry-related harassment, emotional abuse, coercive control, and cruelty within the marital home. This contradiction raises a difficult but necessary question: who protects the bride when the protector becomes the source of harm? Through a feminist legal analysis of the Bharatiya Nyaya Sanhita, 2023, the Protection of Women from Domestic Violence Act, 2005, and judicial interpretations of matrimonial cruelty, this article examines how women's suffering is normalised long before it is legally recognised. It argues that dowry deaths are not merely the result of unlawful demands for money or property, but the consequence of a culture that glorifies female endurance, rewards silence, and often expects women to honour marriages that have ceased to honour them. Ultimately, this article contends that preventing dowry deaths requires more than legal punishment after tragedy. It requires questioning the social belief that a woman's virtue lies in her ability to suffer and recognising that no institution, including marriage, should demand a woman's dignity, safety, or life as its price.

Keywords: Dowry Deaths, Matrimonial Cruelty, Feminist Jurisprudence, Domestic Violence, Dowry Harassment, Marriage, Patriarchy, Women's Rights.

I. "Just Adjust": The Most Dangerous Advice Given to Married Women

Few phrases are as casually offered to married women as the words "just adjust." It is advice given by parents, relatives, neighbours, and sometimes even by those who genuinely care about a woman's well-being. A newly married woman who complains about emotional neglect is told to adjust. A woman struggling with controlling in-laws is told to adjust. A woman isolated from her parents is told to adjust. Even when concerns become serious, the expectation often remains unchanged. The message is simple: marriage requires sacrifice, and that sacrifice is expected from her.

The problem is not that adjustment is inherently wrong. Every meaningful relationship requires compromise. Marriage, like any partnership, demands patience, understanding, and the willingness to accommodate differences. However, there is a significant difference between adjusting to a person's habits and adjusting to conduct that causes emotional harm. Yet, this distinction is often ignored. Women are frequently encouraged to tolerate humiliation, neglect, isolation, and coercive behaviour under the same label of "adjustment," as though all forms of discomfort are equally normal parts of married life.¹

What makes this expectation particularly troubling is its unequal nature. Men are often described as naturally aggressive, short-tempered, emotionally unavailable, or difficult to change. Women, on the other hand, are expected to be patient enough to absorb the consequences of these behaviours. Harmful conduct is normalised through familiar explanations: "Men are like that," "Every husband behaves this way," or "Things will get better once you settle in." Instead of asking why a woman is being subjected to such treatment, the focus shifts to whether she is adjusting enough.

For many women, the pressure to adjust does not come from strangers. It comes from the very people they trust most. Parents who fear social stigma, relatives concerned about family reputation, and older women who were themselves taught to endure often encourage silence in the name of preserving marriage. Their advice may emerge from love, fear, experience, or social conditioning, but its effect is often the same. The woman's distress is postponed, minimised, or treated as something she must learn to live with.

As a result, suffering is rarely recognised when it first appears. Emotional neglect is dismissed

¹ Protection of Women from Domestic Violence Act, No. 43 of 2005, § 3, India Code (2005).

as a minor marital disagreement. Isolation from one's parents is viewed as a normal consequence of marriage. Financial pressure and unreasonable expectations are often framed as family matters that should remain private.² The warning signs are not necessarily invisible; they are simply explained away. What should provoke concern is frequently reinterpreted as a test of a woman's patience and commitment.

Perhaps the most troubling aspect of adjustment culture is the contradiction it creates. A woman who leaves a harmful marriage is often criticised for giving up too easily, for being influenced by modern ideas, or for failing to adjust. Yet when a tragedy occurs, the same society wonders why nobody recognised her suffering sooner. Women are therefore placed in an impossible position: criticised for leaving and ignored for staying. It is within this contradiction that many stories of matrimonial abuse begin.

The question, therefore, is not whether adjustment has a place in marriage. The real question is whether women are being asked to adjust to circumstances that should never have required adjustment in the first place.

II. Suffering in Silence, Celebrated as Virtue

There is a particular kind of silence that is not chosen freely. It is learned, repeated, and slowly rewarded. In many marriages, a woman's silence is not read as distress but as maturity. When she does not complain, she is called understanding. When she absorbs emotional neglect, she is called patient. When she continues despite feeling isolated or unheard, she is called strong. Over time, what she is actually enduring becomes less visible than the labels attached to her endurance.

This expectation often begins in very ordinary ways. A woman who speaks about being emotionally hurt is told that every marriage has such phases. A woman who feels isolated from her parents is reminded that adjustment takes time. A woman who feels controlled or dismissed is advised not to overthink. None of these responses explicitly deny her experience. Instead, they soften it until it no longer feels urgent enough to respond to.

The problem is not that families or society are indifferent. Often, the advice to stay silent comes

² Flavia Agnes, *Law and Gender Inequality: The Politics of Women's Rights in India* 190–215 (Oxford Univ. Press 1999).

from fear, habit, or lived experience. Mothers who endured similar treatment may advise their daughters to adjust because they believe resistance leads to greater harm. Relatives may discourage open discussion because they fear social stigma. In this way, silence is not only imposed from outside but also inherited as a survival strategy. What is passed down is not just tradition, but a way of enduring pain without naming it.

Yet, when suffering is consistently treated as normal, it begins to lose its identity as harm. Emotional neglect is no longer recognised as neglect. It becomes routine marital stress. Isolation from family is no longer seen as control. It becomes part of settling into a new home. Financial pressure or constant criticism is no longer questioned. It becomes personality difference.³ The law may recognise these as forms of abuse, but everyday language strips them of urgency long before they reach a courtroom.

This is where the moral weight of adjustment becomes dangerous. A woman is not only expected to remain in the marriage. She is expected to remain composed within it. Even when she is emotionally exhausted, she is expected to present herself as someone who is coping well. The appearance of stability becomes more important than the reality of suffering. In this structure, emotional labour becomes invisible work that is demanded but rarely acknowledged.

What makes this silence particularly heavy is that it is often rewarded. A woman who endures without complaint is praised for holding the family together. A woman who sacrifices her comfort is described as ideal. A woman who does not speak about her distress is seen as dignified. These words sound positive, but they often conceal a deeper expectation that her pain should remain unspoken in order to preserve harmony.

The result is a contradiction that is difficult to escape. If she speaks, she is told she is disrupting the marriage. If she stays silent, she is praised for her strength. If she leaves, she is accused of not trying enough. In each position, the responsibility for preserving the relationship rests disproportionately on her. Her emotional experience becomes secondary to the stability of the institution around her.

There is also a quieter tragedy in how this endurance is remembered. It is often only after irreversible harm that people begin to reinterpret earlier signs of distress. Conversations that were once dismissed as minor complaints are later described as warnings. Behaviour that was

³ Protection of Women from Domestic Violence Act, No. 43 of 2005, § 3, India Code (2005).

once normalised is later called troubling. The recognition comes, but it comes too late to matter in real time.

III. From Marital Duty to Legal Injury

Matrimonial abuse rarely begins in a way that is immediately recognised as abuse. It often starts with patterns that are quietly absorbed into daily life. A woman may feel emotionally neglected, isolated from her family, controlled in small decisions, or repeatedly humiliated. In real time, these experiences are often not named as legal wrongs. They are described as adjustment. In law, however, the same conduct may amount to cruelty or domestic violence.

Indian law does not limit cruelty to physical violence. Section 85 of the Bharatiya Nyaya Sanhita, 2023 recognises both physical and mental cruelty by a husband or his relatives.⁴ The Protection of Women from Domestic Violence Act, 2005 also recognises emotional, verbal, and economic abuse as forms of domestic violence.⁵ The law is clear that harm in a marriage can be psychological and sustained, not only physical.

The Supreme Court has also recognised this reality. In *Samar Ghosh v. Jaya Ghosh*, the Court held that mental cruelty must be understood through its impact and duration rather than fixed definitions.⁶ In *V. Bhagat v. D. Bhagat*, it was observed that continuous humiliation and sustained mental harassment can make cohabitation unbearable and amount to cruelty.⁷ These judgments make one point clear. Cruelty is often a pattern, not a single incident.

Yet social understanding does not move at the same pace as law. Emotional neglect is dismissed as normal marital conflict. Isolation from one's natal family is called adjustment. Financial control is framed as family discipline. The same conduct that law recognises as harm is often treated socially as ordinary marriage.

This delay changes how suffering is seen. Long silence is read as tolerance. Endurance is mistaken for consent. When a woman finally speaks, the question is often not what she endured, but why she stayed so long. In this way, survival itself is misread.

⁴ Bharatiya Nyaya Sanhita, No. 45 of 2023, § 85, India Code (2023).

⁵ Protection of Women from Domestic Violence Act, No. 43 of 2005, § 3, India Code (2005).

⁶ *Samar Ghosh v. Jaya Ghosh*, (2007) 4 S.C.C. 511 (India).

⁷ *V. Bhagat v. D. Bhagat*, (1994) 1 S.C.C. 337 (India).

The Protection of Women from Domestic Violence Act, 2005 allows early intervention through protection and residence orders. However, these remedies are often used only after escalation, not at the first signs of distress. Similarly, dowry death provisions under Section 80 of the Bharatiya Nyaya Sanhita, 2023 operate most strongly only after a death has occurred within a defined period of marriage.⁸ The strongest legal response often arrives after irreversible harm.

This creates a gap between lived experience and legal recognition. What is minimised socially is recognised legally only after escalation. By then, adjustment is reinterpreted as cruelty, and silence is reinterpreted as evidence.

What is called adjustment in life often becomes cruelty in law, but only after the cost of recognition has already been paid.

IV. The Perfect Victim Must First Die

When a woman speaks about her marriage while she is still alive, she is rarely taken at face value. She is told to adjust. She is told not to exaggerate. She is told to protect the marriage even when she is the one being slowly erased within it. Her pain is acknowledged, but always reduced, always delayed.

But when she dies, everything suddenly becomes “obvious.” The same words she spoke are replayed as warnings. The same distress that was once dismissed becomes evidence. Society does not suddenly discover her suffering. It simply stops denying it once she is no longer alive to defend it.

This is not a lack of law. Section 85 of the Bharatiya Nyaya Sanhita, 2023 recognises mental cruelty and the Protection of Women from Domestic Violence Act, 2005 recognises emotional and economic abuse.⁹ The law already knows what harm looks like. What fails is the social refusal to treat a living woman’s distress as serious.

Instead, early abuse is constantly softened. Emotional neglect becomes “normal marriage issues.” Isolation becomes “adjustment.” Control becomes “care.” Humiliation becomes “temper.” A woman is expected to survive these translations of harm into normality until it

⁸ Bharatiya Nyaya Sanhita, No. 45 of 2023, § 80, India Code (2023).

⁹ Bharatiya Nyaya Sanhita, No. 45 of 2023, § 85, India Code (2023); Protection of Women from Domestic Violence Act, No. 43 of 2005, § 3, India Code (2005).

becomes unbearable.

So she exists in an impossible structure. If she speaks early, she is dramatic. If she stays silent, she is strong. If she dies, she is finally believed. Her credibility rises only when her voice disappears. This is not justice. This is delayed recognition dressed as understanding.

V. The Law Arrives After the Funeral

One of the cruelest realities of dowry-related violence is that a woman's suffering often becomes believable only after it becomes irreversible.

Most dowry death cases do not begin with death. They begin with statements that are painfully familiar. "I'm not happy." "Something feels wrong." "They keep demanding more." "I feel trapped." "I don't think I can do this anymore." Yet these words are rarely treated as warnings. They are absorbed into the vocabulary of marriage. She is told to "adjust," to "be patient," to "save the relationship," or simply to "give it some more time."

What is deeply unsettling is that the problem is often not the absence of warning signs. It is the refusal to recognise them as warning signs.

Indian law does not ignore matrimonial abuse. Section 80 of the Bharatiya Nyaya Sanhita, 2023 addresses dowry deaths, while the Dowry Prohibition Act, 1961 criminalises dowry demands.¹⁰ The law understands that cruelty, harassment, and dowry-related pressure can exist behind closed doors. Yet in practice, a woman's distress is often taken seriously only after it has produced the most extreme outcome.

This reflects a larger social failure. A woman who complains about her marriage is frequently viewed as someone who is "overreacting." A woman who leaves is labelled "impatient," "selfish," or a product of "modern feminism." She is asked why she could not "adjust a little more." The marriage is examined less than the woman who wants to escape it.

The expectation is almost always the same. Stay a little longer. Endure a little more. Be a little quieter. What is described as adjustment is often nothing more than the normalisation of suffering. Emotional neglect becomes "normal husband-wife problems." Isolation from parents

¹⁰ Bharatiya Nyaya Sanhita, No. 45 of 2023, § 80, India Code (2023); Dowry Prohibition Act, No. 28 of 1961, §§ 3–4, India Code (1961).

becomes "part of marriage." Constant criticism becomes "his nature." Financial pressure becomes "family expectations." Harm is not denied. It is renamed until it sounds ordinary. This is where the burden shifts unfairly onto women. Instead of asking why a woman is suffering, society asks whether she is suffering gracefully enough. Instead of questioning the marriage, it questions her ability to tolerate it. Endurance is celebrated. Silence is praised. Self-sacrifice is romanticised. The result is an impossible contradiction. If a woman leaves, she is accused of not trying hard enough. If she stays, she is expected to suffer quietly. If she speaks, she is told not to bring "private family matters" into public view. If she remains silent, that silence is treated as proof that everything is fine.

And then, when tragedy strikes, the narrative changes overnight.

The same messages that were ignored become evidence.

The same tears that were dismissed become warning signs.

The same woman who was told to "adjust" becomes a woman everyone claims should have been helped.

Perhaps the most disturbing truth is that many women are not failed by a single act of violence. They are failed by countless moments of minimisation that come before it. A thousand small dismissals often pave the way for one irreversible tragedy. A society that views divorce as a greater embarrassment than abuse is not protecting marriage. It is protecting appearances.

"A divorced daughter is better than a dead daughter."

A woman should not have to die before her suffering becomes credible.

VI. "I Am Trapped": The Warnings We Refuse to Hear

Dowry deaths rarely occur without warning. The warnings are often spoken, written, cried over the phone, or hidden in messages sent to trusted friends and family. Women speak about feeling isolated, humiliated, exhausted, controlled, or afraid. Sometimes the warning is heartbreakingly simple: "I am trapped." Yet these words are frequently treated as temporary emotions rather than indicators of serious harm.

The case of Twisha Sharma brought this reality into public focus. Following her death, reports

surfaced of messages in which she allegedly described feeling trapped, emotionally distressed, and unable to cope with the circumstances of her marriage.¹¹ Whether the allegations are ultimately established in court is a matter for legal determination. However, what cannot be ignored is how familiar her words sounded to countless women. The phrase “I am trapped” was not merely a statement about one marriage. It reflected an experience many women recognise but are often expected to endure silently.

The same pattern can be seen in several other cases that briefly captured public attention before gradually disappearing from national conversation. The deaths of Deepika Nagar and Palak Rajak generated widespread outrage after allegations of dowry related harassment emerged.¹² In each case, grieving families pointed to earlier signs of distress that they believed had not been adequately addressed. The details differed, but the underlying story remained painfully similar. The suffering was visible long before the tragedy became visible.

What connects these cases is not merely the allegation of dowry harassment. It is the existence of warnings that were repeatedly absorbed into the language of adjustment. Women expressed fear and exhaustion. Families were aware that something was wrong. Friends often knew more than they realised. Yet the response was frequently the same. “Give it some time.” “Things will improve.” “Don't bring husband-wife matters outside the house.”

Perhaps the most disturbing reality is that many women are speaking long before they become headlines. Their messages, calls, and conversations often reveal a person searching not for sympathy but for acknowledgment. They are trying to communicate that something is wrong. What they frequently receive instead is advice on how to survive it.

Only after tragedy strikes do these warnings acquire legal significance. Messages become evidence. Conversations become witness statements. Distress becomes proof. The woman herself has not become more credible. Society has simply become less capable of ignoring her.

¹¹ “Twisha Sharma Dowry Harassment Case: A Timeline of Events,” *The Hindu* (May 27, 2026), <https://www.thehindu.com/news/national/madhya-pradesh/twisha-sharma-dowry-harassment-case-a-timeline-of-events/article71036953.ece>.

¹² “Woman Dies 18 Months After Wedding, Family Alleges Murder, Says Constant Dowry Torture,” *Times of India* (May 22, 2025), <https://timesofindia.indiatimes.com/city/noida/woman-dies-18-months-after-wedding-family-alleges-murder-says-constant-dowry-torture/articleshow/131184875.cms>; “Palak Rajak Case: In-Laws Deny Dowry Harassment Claims in Gwalior Death Probe,” *India Today* (May 24, 2026), <https://www.indiatoday.in/india/story/palak-rajak-case-in-laws-deny-dowry-harassment-claims-in-gwalior-death-probe-2916355-2026-05-24>.

The issue, therefore, is not a lack of warning signs. The issue is a collective failure to treat those warning signs as sufficient reason to act.

Women do not become victims on the day they die. By then, they have often spent months trying to explain their suffering to people who insisted it was merely a phase of marriage.

VII. The Cost of Being a "Good Woman"

Perhaps one of the greatest tragedies of patriarchy is that it teaches women to take pride in their own suffering.

From a young age, women are told stories about the "good woman." She is patient. She forgives endlessly. She sacrifices quietly. She puts everyone before herself. She tolerates what others cannot. She carries pain without complaint. Society presents these qualities as virtues, but rarely asks a simple question: why must a woman's worth be measured by how much she can endure? A "good woman" is rarely praised for choosing herself. She is praised for choosing others over herself. The ideal wife is expected to forgive what should never have happened. The ideal daughter-in-law is expected to tolerate what should never have been tolerated. The ideal daughter is expected to return to her parents only as a guest, never as someone seeking refuge. The message is clear. A woman's strength is not measured by her freedom, but by her willingness to remain. This is where the idea of the "good woman" becomes dangerous.

Women are taught that leaving is failure. That saying "enough" is selfish. That protecting themselves is rebellion. The moment a woman refuses to suffer quietly, she risks losing the very label society once celebrated. Suddenly, she becomes "difficult," "disrespectful," "modern," or one of those "feminist girls" who supposedly do not understand marriage.

The patriarchal formula is remarkably simple:

Suffer quietly and you are strong.

Forgive endlessly and you are mature.

Sacrifice yourself and you are ideal.

Choose yourself and you are the reason the marriage failed.

What patriarchy fears is not divorce. What it fears is a woman realising that her life is worth more than her obedience. Perhaps this is why so many women are encouraged to preserve marriages at all costs. Not because the marriage is healthy. Not because the woman is happy. But because a woman choosing herself exposes a truth that patriarchy desperately tries to hide. The institution survives not merely through love or commitment, but through the unequal burden placed on women to keep it alive. The cost of being a "good woman" is therefore painfully high. It is paid in silence. It is paid in self-doubt. It is paid in abandoned ambitions, damaged mental health, and years spent convincing oneself that suffering is normal. Women are taught to wear endurance like a badge of honour while their pain is dismissed as part of their duty.

And when that suffering eventually breaks them, society mourns them with the very compassion it denied them while they were alive.

The most painful irony is that women are not rewarded for being happy. They are rewarded for being accommodating. They are not celebrated for living freely. They are celebrated for suffering gracefully.

Perhaps it is time to ask a different question. If becoming a "good woman" requires a woman to continuously diminish herself, then who exactly is benefiting from her goodness?

VIII. Till Death Do Us Part. But Whose Death?

Every little girl grows up hearing some version of the same story.

One day, she will get married. She will find a partner. A companion. Someone who will stand beside her through life's uncertainties. Someone who will protect her, respect her, and care for her.

Marriage is sold to women as safety.

Then why do so many women spend their marriages searching for it?

Perhaps the most uncomfortable question that society refuses to answer is this:

Who protects the bride when the protector becomes the threat?

Women are repeatedly told that a husband is their shield, their support system, their safe place. Yet when that very space becomes a source of fear, humiliation, cruelty, neglect, or violence, the burden somehow shifts back onto the woman. Instead of asking why she is suffering, society asks why she cannot endure it a little longer. The irony is painful. A woman is expected to trust the very person from whom she needs protection. She is expected to adjust with the very person who is hurting her. She is expected to preserve the very relationship that is destroying her. And if she refuses, she is told that she is abandoning her duties. But what about his? Marriage vows are often spoken as though they bind women more than men. Women are constantly reminded to be patient, forgiving, understanding, and accommodating. They are taught the meaning of commitment from the day they are born. Yet when a husband fails to offer respect, dignity, care, or safety, society rarely asks whether he has honoured the promises he made. Instead, the woman is asked to honour promises that have already been broken against her. Perhaps that is the cruelest expectation of all. A woman can spend years trying to save a marriage and still be blamed for its failure. She can speak and be called dramatic. She can remain silent and be told that nobody knew. She can leave and be accused of destroying a family. She can stay and be asked why she did not leave sooner. The rules change. The blame remains. The tragedy is not merely that women are subjected to abuse. The tragedy is that many women are conditioned to believe that enduring abuse is somehow more respectable than escaping it. Somewhere along the way, society transformed self-preservation into selfishness. Somewhere along the way, a woman's willingness to suffer became more valuable than her willingness to survive. And perhaps that is why the phrase "till death do us part" feels particularly unsettling in conversations about matrimonial abuse. Because for some women, death becomes the only point at which their suffering is finally acknowledged. Only then are they called victims. Only then are they mourned. Only then does everyone suddenly wish they had listened sooner. But marriage was never meant to be a test of how much pain a woman can endure before she breaks. A marriage that survives because a woman silences her fears, abandons her dignity, and sacrifices her wellbeing is not a successful marriage. It is merely a successful performance of patriarchy. No institution, no tradition, no social expectation is important enough to demand a woman's suffering as its price. Perhaps it is time to stop asking women why they left. Perhaps it is time to start asking why they were expected to stay.

A woman does not break her vows when she walks away from abuse. The vows were broken the moment she was denied the love, dignity, respect, and protection she was promised.

Conclusion

Dowry deaths do not begin on the day a woman dies. They begin much earlier in the moments that are ignored, the warnings that are dismissed, and the suffering that is repeatedly disguised as adjustment. By the time a death becomes a police case, a headline, or a matter of public outrage, countless opportunities to listen, intervene, and protect have already been lost. The persistence of dowry deaths is not merely a failure of law. It is a failure of a society that continues to romanticise female endurance while questioning female resistance. As long as women are expected to tolerate humiliation for the sake of marriage, abuse will continue to be normalised long before it is recognised. Dowry deaths are not only about unlawful demands for money or property. They are about a culture that teaches women to stay even when they are suffering and teaches others to look away until that suffering becomes impossible to ignore.

The question is no longer how many women die because of dowry. The question is how many warnings must be dismissed before we finally decide that a woman's life matters more than the marriage that is hurting her.