

A Need For Legal Recognition Of Live-In Relationships In India: An Empirical Study

Kumud Mehra¹ , Dr. Ashish Verma² , Dr. Shalini Saxena³ , Dr. Tarak Nath Shaw⁴

¹ Research Scholar, School of Law, IMS Unison University, Dehradun; kumud.mehra@gmail.com.

² Supervisor of the Research scholar & Dean, School of Law, IMS Unison University, Dehradun.

³ Assistant Professor, School of Law, IMS Unison University, Dehradun.

⁴ Working as a Guest Faculty at various prominent universities across the country.

Abstract

India, a country with strong traditional values, traditionally views marriage as a sacred rite, but in today's rapidly modernizing society, this conventional idea is abruptly being replaced by the extraordinary idea of a non-traditional and carefree relationship in the name of live-in relationship (unmarried cohabitation). With the aid of the results of a survey conducted using the snowball sampling technique having sample size of 47 on a 5-point interval scale, the current study measures the perception and sheds light on the true reality of people who live in such situations, including the positive and negative parts of their life and their commitments to one another. With the aid of descriptive analysis and inferential statistics, the study also assesses the circumstances of live-in couples and thoroughly examines whether or not laws should be introduced to protect their rights. These tools are used to study and analyze the variables, find co-relations among them, and determine the gravity of each variable's significance for the study.

Keywords: Marriage, Live-in Relationship, cohabitation, mutual understanding, Income and support, Hindu Marriage Act, 1955, Need for legislation.

Introduction

The emergence of a new phenomenon of living together without getting married to each other in the form of non-marital cohabitation is getting prominent all across the world. In India, it is budding in the name of Live-in relationships or relationships in the nature of marriage.⁵ The legality of live-in relationships in India can be accounted for by various judgments passed by Indian courts from time to time. Courts tried to compartmentalize the concept of a live-in relationship by providing various guidelines, which could be called a pre-requirement for any relationship claiming to be

a live-in relationship to fall in the category of relationship in the nature of marriage.⁶

Though the uncertainty regarding the legality of live-in relationships has been removed, still such relationships are not appreciated in Indian society and at times considered as nothing but an adulterous relationship mainly maintained for enjoying sexual ecstasy. This notion is conceived because of the supremacy of a well-established institution of marriage, which is given utmost regard by the Indian society and contemplated to be an important unit to

preserve the decorum of the society and to protect its social fabric.⁷

In the presence of an age-old institution of marriage, which has been formulated, and is practiced in the form of a custom in almost every religion in our country this newly evolved concept of a live-in relationship stands out of the box in the eyes of the conservative clan. Marriage from time immemorial is observed as a sacred *samskara* in one or the other way in every region and religion in India. It acquires a high position in society and those who are in marriage are highly acclaimed whereas on the flipside those living outside marriage are still condemned by people carrying traditional mindsets. Despite being frowned upon, and looked down with disgust and horror, the concept of live-in relationships is becoming popular day by day among the youths. The new generation finds it hassle-free and burdens less compared to marriage, which calls for reciprocal duties towards each other and each other's family.⁸

Marriage requires complete solemnization either according to the law of land or the personal laws of the parties, in order to be called husband and wife, and to procreate children legitimately; such formalization is not required in a live-in relationship. Under a live-in relationship, the parties may simply agree to stay together under the same roof and share a common household like a husband and wife including the procreation of children. But those living in such kind of living arrangements are neither accorded the status of husband and wife nor they are equipped with the rights available to a married couple. Children born out of live-in relationships though not considered illegitimate, their succession rights get limited if compared to those born out of legal wedlock.⁹ Marriage is an age-old concept if compared to a live-in relationship, which is relatively new in existence; still, it would not be incorrect to say that it emerged in India long back during the

Vedic period in the form of Gandharva vivah which used to be one of a kind of eight marriages prevalent in the olden days. Gandharva vivah being an unapproved kind of marriage got discontinued in its usage with time. It resembles with today's live-in relationship. Both of them have things in common viz - a -viz, both of them do not require any ceremonial celebration and formal solemnization of marriage. Mutual commitment to stay together and take care of each other like husband and wife is the basic requirement to enter into a relationship with each other.¹⁰ Another striking similarity between both concepts is that it does not require the presence of any witness or elderly member of the family for either their blessings or for granting permission. Though both the concepts share common things, still weighing both on the same scale would not be correct, as today's live-in relationship is the outcome of various other reasons as well which were not of any importance in the past.

Today's new generation opts for non-marital cohabitation for several other causes which are nonetheless an outcome of their modern thinking influenced by western culture. A major chunk of youth in India has started deviating from the deep-rooted and well-established institution of marriage, which is being practiced for ages as one of the most important units of society. They believe marriage is an unnecessary burden upon them, which binds them in shackles and obstructs their personal and professional growth.¹¹

Therefore, a large part of the new generation considers live-in relationships better than marriage. Another perspective that comes into the limelight, as a driving force for people choosing live-in relationships over marriage is that they don't want to follow the common pattern of arranged marriage fixed up by their families with a person hardly known to them. As it is believed by most of them that marrying any unknown or little-known person is

devastating and is the root cause of the increasing numbers of divorces in our country, as couples often lack compatibility in such cases, which gradually turns into discontentment and eventually ends up into divorce which has harsh consequences to the mental stability of both the partners.¹²

Thus, in order to avoid the backlash of divorce and to minimize the chance of their separation due to a clash of their viewpoints, people prefer to stay together before marriage to test their compatibility with each other to check whether their thought processes, their nature, and their future perspective, etc. are harmoniously synchronized with each other or not. Apart from the above-discussed reasons, there are several other circumstances as well, which lets many couples take a resort to live-in relationships and not marriage.

Some among them are: -

- 1) Those falling into the category of Degree of prohibited relationships under which marrying each other is not permitted under Hindu Marriage Act, 1955.¹³
- 2) Those who seek to get away from the evils of honor killing and other family conflicts brought on by their differences in caste or religion.¹⁴
- 3) Those who wish to maintain their relationship as a private matter and do not want the government to get involved.¹⁵
- 4) And those who cannot afford the high cost of living in large urban areas choose to share a home, pay rent equally, and inevitably enter into a live-in relationship, etc.¹⁶

Research objective

The researcher in the present paper aims at the following objectives: -

1. To comprehend the practicalities of live-in relationships and how stability is perceived and experienced in these kinds of live-in situations.
2. To assess how they see the relationship and how much they trust one another.
3. To analyze the demographic profile of the Live-in couples.
4. To investigate the factors influencing live-in relationships.
5. To evaluate how their conflicts and dissatisfaction are addressed and settled.
6. To determine whether legislation is required to protect live-in partners rights?

The data collected with the aid of a questionnaire, which included variables based on the experience of the live-in couples, their contribution to the relationship, the duration and purpose of the relationship, the likelihood that the live-in relationship will lead to marriage, their understanding and support of one another, their belief that the live-in relationship is preferable to marriage and how they communicate, the societal acceptance of their live-in relationship and the children born out of such relationships, the instance of either of them being cheated from each other and how far they feel secure with regard to the protection of their rights while staying into a live-in relationship is used to analyze the aforementioned objectives.

Literature Review

Sharma Kanika in “**Challenges of being in a live-in relationship**” has discussed in detail various circumstances, which turns into serious issues for couples who are either staying in live-in relationship or planning to stay in such kind of relationship in India. Our country being a land of culture and tradition still considers live-in relationship a sort of taboo, which is destroying and interfering with the decorum of Indian society. The present article discusses the common problems, which are being faced by those cohabiting each other without any marital ties.

Pandey Spardha in **“Single and Smiling: why young Indians are less interested in getting married?”** the author of the present article has opened many vents which lead to the complete shift in the ideology of the young generation, from an established set of customs to more liberal and unbridled thoughts with regard to there personal freedom, priorities in life, love, matrimonial and intimate affairs.

Chibber Mohit and Aditya Singh in **“Live-In-Relationships: An Ethical and a Moral Dilemma?”** The author of the present article has posed a question about the morality of live-in relationships in our country in order to search whether it is ethical or unethical in the Indian society where marriage is looked upon with extreme respect and living in is still considered a relationship specifically formulated for enjoying illegitimate sexual ecstasy and purposely entered just for the sake of fun and enjoyment by people of different sex.

Chakraborty Ankita in **“The Law Relating to Live-In-Relationship in India and the Breach of Promise to Marry”** has discussed live-in relationships on the basis of various elements, which play important role in strengthening mutual trust in a live-in relationship. One among those is the promise to marry after a certain period of cohabitation. How far the partners trust each other with regard to the future of their relationship is a big question and deciding factor about the fate of their relationship.

Kumar Vijender in **“Live-In Relationship: Impact on marriage and Family Institution”** draws attention to the question of formulating legislation that can regulate the concept of live-in relationships, the rights of the parties, and the children born out of such relationships. How far

it is justified to make such a law and to what extent it is feasible.

Laha Sangita in her article **“Live-in Relationship- An Analysis Through Cases”** tries to throw light upon the attitude of the Indian Judiciary towards granting rights to live-in couples in India. In the absence of legislation that could regulate the concept of Live-in relationships, Indian courts have come up with various guidelines through a number of cases from time to time. The author in the light of the present article tries to estimate the contemporary legal standing of live-in relationships in India.

Dholam Swarupa N. in **“Socio-Legal Dimension of Live-in Relationship In India”** compares the concept of marriage with a live-in relationship while discussing the thin line difference between the two. The author through the present article provides both advantages as well as disadvantages of marriage as well as cohabitation with regard to Indian society.

Research Design

Primarily data has been captured from a sample size of $n = 47$ through the snowball sampling technique. A closed-ended questionnaire was used to collect data on the demographic details of the respondent and a 5-point interval scale was used to measure their perception of the variables used in the study for Live-in relationships. Descriptive statistics such as mean, standard deviation, and percentage have been used to analyze the variables used in the study. Inferential statistics such as multiple regressions, ANOVA and Factor Analysis have also been used in the study for drawing meaningful conclusions.

Data Analysis & Interpretation

Demographic profile of respondents

Table: I Gender Composition					
		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	Male	27	57.4	57.4	57.4
	Female	20	42.6	42.6	100.0
	Total	47	100.0	100.0	

The above table no.I show the number of people who have opted to stay in a Live-in relationship. The total number of respondents was 47 out of

which 27 are males and 20 are females contributing 57.4% and 42.6% of the total respectively

Table: II Age Group					
		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	18-20years	2	4.3	4.3	4.3
	21-23years	14	29.8	29.8	34.0
	23-25years	11	23.4	23.4	57.4
	26-28years	8	17.0	17.0	74.5
	30 and above	12	25.5	25.5	100.0
	Total	47	100.0	100.0	

Table II above shows the age group of respondents staying in live-in relationships. It describes the number of both males and females belonging to different age groups purposely meant to categorize people falling into different categories of age. It shows that out of the total respondents, 2 respondents belong to the age category ranging from 18-20 years, 14 respondents belong to the age group of 21-23 years, 11 respondents from 23-25 years, 8 from 26-28 years and 12 people are of 30 years and above, comprising of 4.3, 29.8, 23.4, 17.0, 25.5 respectively of the total. Here it can be analyzed on the basis of above data that people belonging to the age category of 21-23 years are more

inclined towards non -marital cohabitation. Hence it would not be incorrect to interpret here that live-in relationship is more common among the people who are pursuing there studies in various colleges, coaching institutes etc. while staying out far from there families. Another class, which is ranging high while choosing live-in relationship are the people of 30 years and above, taking this fact into consideration it can be assumed here that more of them have either entered into cohabitation for testing compatibility before marriage or have chosen live-in relationship as permanent union over marriage.

Table: III - Marital Status				
	Frequency	Percent	Valid percent	Cumulative percent
Unmarried	45	95.7	95.7	95.7
Divorced	2	4.3	4.3	100
Widowed	0	0	0	0
Married	0	0	0	0
Total	47	100	100	

Table III tells about the marital status of the respondents who are living together with each other in a non-marital arrangement in the name of a live-in relationship. The table describes that 45 people are unmarried, and 2 are divorced

comprising 95.7 and 4.3 percent of the total. Accordingly, it can rightly be said that more number of unmarried people are inclined towards live-in relationships for various reasons.

Table: IV Area of Residence					
		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	Rural	1	2.1	2.1	2.1
	Urban	46	97.9	97.9	100.0
	Total	47	100.0	100.0	

The above table IV describes the number of people according to the area of their residence. According to the table, only 1 respondent is

from a rural area whereas 46 reside in the urban sector. Therefore it can rightly be said that live-in relationship is more prevalent in urban areas.

Table: V Working status of the live-in partners					
		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	Both working	36	76.6	76.6	76.6
	Male partner working	11	23.4	23.4	100.0
	Total	47	100.0	100.0	

According to the above table no. V, the working status of the live-in partners can be analyzed. Out of the total respondents, 36 respondents comprising both male and female are collectively working which makes 76% of the total and only 11 male respondents, which are only 23.04% of the aggregate are working single-handedly. An apparent notion that can be drawn from the fetched results is that both the partners living in an unmarred cohabitation as their alternative to marriage do not compromise much with their professional career and in fact

compliments each other as far as professionalism is concerned. Also from the present results, it can be inferred that both the partners are free enough to follow their will and do not impose unnecessary limitations upon each other. However, another conjecture, which can be deduced from the present result is that due to the nuclear nature of their relationship they are bound to work in the absence of other forms of financial support, for example, support from the joint family income.

Table: VI Income category of male partners					
		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	MIG	44	93.6	93.6	93.6
	HIG	3	6.4	6.4	100.0
	LIG	0	0	0	0
	Total	47	100.0	100.0	

*LIG- Lower Income Group / MIG- Medium Income Group / HIG-High Income Group

According to the above table no. VI, 44 respondents, which formulates 93.6 % of the total, belongs to the middle-income group, and 3 of them belong to a high-income group, which forms 6.4% of the total respondents. It can be

analyzed here that live-in relationship is also prevalent among the middle-class category and it does not limit itself only to those belonging to the superior class and people in limelight.

Table: VII Income Category of female partners					
		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	LIG	38	80.9	80.9	80.9
	MIG	9	19.1	19.1	100.0
	HIG	0	0	0	0
Total		47	100.0	100.0	

*LIG- Lower Income Group / MIG- Medium Income Group / HIG-High Income Group

Table VII shows the category of income of the females in live-in relationships. As per the data above it is evident that unlike the superior and middle class the females belonging to the lower-income category are also opting for live-

in relationships. Here it can be assumed that live-in among this lower income group ladies might have entered into as a result of expensive accommodation in the urban areas where they work and reside.

Table: VIII Contribution in the household expenses					
		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	Both partners	38	80.9	80.9	80.9
	Male partner	9	19.1	19.1	100.0
	Female partner	0	0	0	0
Total		47	100.0	100.0	

The result obtained from the test applied under table V has shown that majorly both the partners in the relationship fall in the category of working-class based upon which an inference was drawn that both male and female partners cohabiting together are sincere toward each other's profession and are also less compromising with regard to their career; the results obtained under the present table VIII completely corroborate them and are in consonance with the same. Additional speculation that comes out here is that twain are

supportive of each other, help and contribute almost equally to the running of the household as the results show that out of the total number of respondents, a large portion dishing out 80.9% of them collectively contribute in the household expenses and 19.1% comprising of only male members are contributing in the household expense. This shows that a substantial number of live-in relationships have both partners coughing up the household expenses.

Table: IX Duration of Live-in Relationship				
	Frequency	Percent	Valid Percent	Cumulative Percent

Valid	0-1	15	31.9	31.9	31.9
	2-3	21	44.7	44.7	76.6
	3-4	4	8.5	8.5	85.1
	4-5	1	2.1	2.1	87.2
	More than 5	6	12.8	12.8	100.0
	Total	47	100.0	100.0	

The above-mentioned figures in the table no. IX shows the duration of the live-in relationship of different respondents. It describes the number of years since they are together with their respective partners. According to the table, 15 respondents are cohabiting for 1 year, 21 are

staying in a live-in relationship for 2-3 years, 4 are together since 3-4 years, 1 respondent is with his/ her partner since 4-5 years, and 6 of them are together from more than 5 years. It can be concluded here that more of them are together since 2-3 years.

Table: X Purpose of Live-in Relationship

		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	Temporary period	1	2.1	2.1	2.1
	Fun	3	6.4	6.4	8.5
	Testing compatibility before marriage	18	38.3	38.3	46.8
	Undecided	25	53.2	53.2	100.0
	Total	47	100.0	100.0	

The above Table X talks about the purpose of their live-in relationship; for what particular reason they stepped into it and what level of permanency they share. On the examination of the data above it can be interpreted that a major part of the respondents is in the undecided phase of a live-in relationship comprising of 25 people contributing 53.2% of the total. This

could be because of a number of reasons including family pressure, different castes, and clashing viewpoints. However, on the other side, 18 respondents comprising of 38.3% of the total respondents are in the decisive phase as they are testing the waters before diving into the saga of marriage.

Table: XI Offspring's out of live-in relationship

		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	Yes	2	4.3	4.3	4.3
	No	45	95.7	95.7	100.0
	Total	47	100.0	100.0	

The above-mentioned table shows the number of respondents having children out of their live-in relationship. According to the graph, 2 respondents have issues out of their union

however 45 don't have any child from their live-in relationship. Inference could be drawn here that less number of couples are in favor of having children in their unmarried relationship.

Table: XII Descriptive Statistics

Serial No.		N	Mean	%	Std. Deviation
1	Family is aware of the live-in relationship	47	2.87	57.45	1.03
2	The live-in relationship will finally conclude into marriage.	47	3.53	70.64	0.83
3	Live-in relationship is for better understanding between partners.	47	3.98	79.57	0.79
4	Most of the live-in relationships are entered into just for the sake of fun and enjoyment.	47	3.06	61.28	1.05
5	The partners are supportive in live-in relationship.	47	4.09	81.70	0.88
6	Live-in partners own joint assets.	47	3.32	66.38	1.02
7	Live-in relationship is better than marriage anyhow.	47	3.00	60.00	1.02
8	Children born out of live-in relationships are accepted in the Indian society.	47	2.98	59.57	0.97
9	The partners leave the company of another live-in partner after making false promise to marry.	47	2.47	49.36	0.91
10	Other live-in friends of the couple resolve their fights and discontentment.	47	2.96	59.15	1.10
11	Legislation is required to protect and define the rights of the live-in partners and children born out of such relationships.	47	4.09	81.70	0.90
12	Probability of live-in relationship to culminate into marriage.	47	3.38	67.66	1.11

Below mentioned findings are the result based upon the analysis of the table above: -

1. Taking the first variable into consideration it can rightly be said that

most of the couples that stay in live-in relationships reside secretly without revealing their relationship to their family members. Here it can be interpreted that family pressure,

partners with different caste, clans, and gotras prohibited degrees of relationships that don't allow one to marry another person, and the economic status of the live-in partners can be one of the various reasons to conceal their relationship from their family.

2. Evaluating the results based upon the second variable, it could positively be perceived that couples living in relationships tend to see their bond with farsightedness and believe to crystalize it finally into marriage. They cohabit together not only for fun purpose but to test their compatibility with each other that further serves them to take decision to either marry or not to marry each other.
3. As per the third variable, couples often cohabit before marriage in order to understand each other properly. To know each other's likings and priorities. To test whether they could adjust with each other or not in order to avoid future problems that might occur after marriage.
4. According to the test results that came from the evaluation of the fourth variable it could be said that couples opting for unmarried cohabitation generally do not reside with each other just for the sake of fun and enjoyment.
5. As per the fifth variable it could confidently be assumed that live-in partners are highly supportive of each other. This could be because of a number of reasons; one such could be the nuclear arrangement of their residence, in the absence of other people in the house they get more time to understand each other and reciprocate to give more value to their partner's opinions.
6. According to the sixth variable, couples who reside in an unmarried cohabitation most commonly or prone to buy joint assets in the name of either each other or collectively. This may be due to the level of trust and faith they develop upon each other over time.
7. Couples living in unmarried cohabitation often believe that the nature of their relationship is better than marriage as per seventh variable. This may be due to less number of hassles involved in unmarried cohabitation in contrast to marriage.
8. According to the eighth variable it is evident that most live-in couples believe that if they procreate children out of their non-marital union their wards will not be accepted in society in the same way as those who are born out of wedlock.
9. Leaving each other after making false promises to marry is less probable according to the ninth variable. This shows the presence of high reliability in live-in relationships. Proving the notion that a live-in relationship is a walk-in and walk-out relationship as a myth
10. As per the tenth variable it can be concluded that live-in couples often resolve their grudges and discontentedness on their own and they do not get any support from their friends who are also in live-in relationships.
11. According to the eleventh variable a huge number of couples residing in live in relationships are of the opinion that there is a dire need of a legislation to be formulated in order safeguard their interests and to provide them legal protection in case of death of either partner, custody of the child if any, at the time of their split
12. As per the twelfth variable, most couples are of the opinion that there is a high probability of their live-in relationship culminating into marriage.

Factor Analysis

Table: XIII KMO and Bartlett's Test		
Kaiser-Meyer-Olkin Measure of Sampling Adequacy.		.626
Bartlett's Test of Sphericity	Approx. Chi-Square	189.525
	df	66
	Sig.	.000

In the above mentioned table no XIII the KMO value is greater than 0.5, therefore, it passes the test of Measure of Sampling Adequacy and the

Chi – Square ($p = 0.000$) is less than $\alpha = 0.05$ thus, it passes the Barlett’s Test of Sphericity as well.

Table: XIV Rotated Component Matrix^a						
S. No	Variables	Component				
		1	2	3	4	5
1	Family is aware of the live-in relationship	-0.117	0.195	0.038	0.084	0.894
2	The live-in relationship will finally conclude into marriage.	0.334	-0.055	0.817	-0.111	0.075
3	Live-in relationship is for better understanding between partners.	0.831	0.207	0.238	0.092	-0.112
4	Most of the live-in relationships are entered into just for the sake of fun and enjoyment.	-0.020	-0.702	-0.140	0.196	-0.250
5	The partners are supportive in live-in relationship	0.898	-0.003	-0.030	0.056	-0.038
6	Live-in partners own joint assets.	-0.003	0.396	0.683	0.006	-0.009
7	Live-in relationship is better then marriage anyhow.	0.145	-0.052	-0.190	0.849	0.097
8	Children born out of live-in relationships are accepted in the Indian society.	-0.196	-0.455	0.304	0.592	0.182
9	The partners leave the company of another live-in partner after making false promise to marry.	-0.822	0.050	-0.204	0.041	0.024
10	Other live-in friends of the couple resolve their fights and discontentment.	0.005	0.807	-0.101	0.086	-0.004
11	Legislation is required to protect and define the rights of the live-in partners and children born out of such relationships.	0.092	0.170	0.118	0.644	-0.512

In the above table no. XIV,11 independent variables used in the study were subjected to

Factor Analysis in order to group the variables under broad categories. The data was subjected

to Varimax Rotation and it generated the following 5 Factors:

- (1) Compatibility Test
- (2) Help from friends who are also living in live-in relationships
- (3) Having marriage as their final destination
- (4) Protection of the Rights of the couple as well as their offspring and
- (5) Public Declaration

The significant variables falling under the five broad categories are as follows:

1. **Factor Set 1 –Test for Compatibility**
 - Getting into Live In Relationship was for better Understanding
 - My partner is very supportive in difficult times.
2. **Factor Set 2 - Help From Friends Who Are Also Living In Live-In Relationships**
 - Mutual disagreements are sorted out by my other Live-In Friends.

3. **Factor Set 3 – Having Marriage As An Ultimate Goal**

- My Live In Relationship will conclude into marriage.

4. **Factor Set 4 - Protection Of Rights**

- Live In Relationship is better than marriage.
- Legislation is required to protect my rights.

5. **Factor Set 5 - Public Declaration**

- My family is aware about my Live-In Relationship.

These fivebroad factors mentioned above were taken as independent variables, in order to examine their effect upon the dependent variable, which is“The probability of live-in relationshipculminating into marriage”. The average of the variables acquired under five broad factors was then subjected to Multiple Regression Analysis (Enter Method) and the following output is obtained.

Table:XV		
Model	Variables Entered	Method
1	X5, X4 X3, X2, X1	Enter

X1: Test for Compatibility;X2: Help from friends who are also living in live-in relationships; X3:Having marriage as their final

destination; X4: Protection of the Rights of the couple as well as their offspring; X5: Public Declaration

Table: XVI Model Summary				
Model	R	R Square	Adjusted R Square	Std. Error of the Estimate
1	.739 ^a	.546	.503	.78558

a. Predictors: (Constant), X5, X4, X3, X2, X1

The five independent variables have a significant association with the dependent variable, as indicated by the coefficient of multiple determination, which is 0.739. There

is a substantial correlation between the independent and dependent variables, as indicated by the R square and R square adjusted having value more than 0.50.

Table: XVII ANOVA ^a					
Model	Sum of Squares	df	Mean Square	F	Sig.

1	Regression	31.187	5	6.237	9.868	.000 ^b
	Residual	25.920	41	.632		
	Total	57.106	46			

a. Dependent Variable: Y

b. Predictors: (Constant), X5, X4, X3, X2, X1

From the above ANOVA table it is observed that the p value = 0.000 is less than $\alpha = 0.05$ suggesting strong association between the independent and dependent variables.

Table: XVIII Coefficients ^a								
Model		Unstandardized Coefficients		Standardized Coefficients	t	Sig.	Collinearity Statistics	
		B	Std. Error	Beta			Tolerance	VIF
1	(Constant)	-.358	.823		-.435	.666		
	X1	.545	.163	.383	3.338	.002	.821	1.219
	X2	-.188	.107	-.186	-1.756	.086	.967	1.034
	X3	.644	.150	.480	4.288	.000	.862	1.160
	X4	.436	.115	.561	3.791	.000	.696	1.437
	X5	-.062	.115	-.057	-.535	.595	.943	1.060

From the above table no. XVIII, it is observed that the variables which are significantly contributing to the study under investigation are X1, X3 and X4 since the p values of these variables are less than $\alpha = 0.05$, and the variable which is proved to be insignificant for the study is X5 having β coefficient (-.057).

The magnitude of the standardized β coefficients for the independent variables (X1, X3 and X4) are given below representing the percentage of their effect upon the dependent variable (Y="The probability of live-in relationship culminating into marriage"):

1. X1(Test for Compatibility) is contributing 38.3%,
2. X3(Having marriage as an ultimate goal) is contributing 48%
3. X4(Protection of Rights) 56.1% towards the dependent variable (Y).

Thus, from the data above it can positively be reduced that majority of the couples living in non-marital cohabitation takes their alliance on a very serious note and foresees their union with high level of permanency. On the basis of the test above, it can also be concluded that couples

often get into live-in relationships to test their compatibility before formally announcing their relationship to the world outside and look forward towards getting legally tied in the matrimonial bonds with each other in a long run based upon the success rate of their mutual compatibility. Alongside, it is also correct that large portion of those couples who enjoys each others company and wish to stay together forever without getting involved into the hassle of marriage, want social acceptance to their decisions of living in a live-in relationship and requires to get their rights and the rights of their children to be protected by the government in the form a legislation to which they can take resort for the determination of their rights and for redressing grievances among themselves and third parties. However, it is also observed from the test that the fact that whether their parents and families are aware about their live-in relationship does not play important role for determining the future of their relationship, as in present times, the young cohorts of today's generation are independent enough both

financially and psychologically to make their own decisions.

Conclusion

It is undeniable that the youthful generation in our country is much more pragmatic and realistic in their approach to their personal lives. The majority of the current generation bluntly rejects the idea of adhering to long-standing traditional Indian customs, in which the elders of the household were completely in charge of organizing marriages and any involvement from the bride or groom was seen as a direct insult to the entire family. Today, there has been a significant change in this trend, with children taking control of their own marriage affairs and making decisions about whether or not to get married, when to get married, and with whom. People today have changed their pattern of priorities and are more focused on their personal wellbeing and mental health. They desire to tie the knot with the partners of their choice under their own terms. As a result, young people are turning to a new kind of family building known as live-in relationships. Such a kind of family formation is budding in India due to several reasons ranging from being rebellious against traditional families to testing compatibility. The researchers, with the help of data gathered has concluded the present paper, which is based upon the ground realities of people who are presently living into live-in relationships due to number of reasons.

Summing up the results obtained, the researchers are of the opinion that the couples who choose to live together in unmarried relationships like a husband and wife are though emotionally and psychologically strong but legally vulnerable in India. Analyzing the outcomes obtained after evaluating various factors of their life what conclusively came out is as follows:

1. Low level of economic interdependency as majorly both of the partners in the relationship are working.

2. High level of mutual understanding as both contribute equally in the household expenses.
3. Low level of family support as most of the couples are staying together without informing their families due to several reasons comprising caste barriers, prohibited degrees of relationships, conservative thinking of the families etc.
4. High level of interpersonal respect and support as they take their relationship seriously and not staying together just for enjoying sexual ecstasy.
5. High level of mutual trust and tolerance as they involve very less interference of families or friends in their tough times.
6. High level of farsightedness with regard to their relationships as they feel safe to indulge themselves for having joint assets for their future.
7. Low level of social security as in the absence of any legislation that could provide recognition to their relationship they feel obscure about the future of their children.

The researchers in the current study conducted a more thorough analysis of the data and found that many live-in couples are encouraged to maintain their relationships and treat their partnerships with the same respect as their married counterparts; and with the aid of inferential statistics, a number of factors were thoroughly investigated, and the researchers came to the conclusion that unmarried couples who choose to live together are both in favour of taking their relationship to a point where they can legally refer to themselves as married to one another and call for the creation of separate legislation that would define and legally recognize their rights duties towards each other.

Suggestions

Although marriage has been a highly esteemed and revered social institution in India for ages, it cannot be denied that the younger generation is increasingly gravitating toward novel kinds of family formation, such as unmarried

heterosexual unions. Law serves as a catalyst for social change and adapts to the needs and demands of a society that is constantly evolving. Law is changed to reflect the changes in the situation at the time. And to ensure that the fundamental tenets of society are not upended, law always favours the interests of the general public and works to maintain balance between the two extremes having variety of viewpoints.

Thus, taking present situation into consideration, it also cannot be overlooked that Indian society actually needs a powerful legislation or an equivalent to it in order to control and prevent the abuse of these types of relationships specifically dealing with:-

1. What is a live-in relationship and what are its characteristics.
2. Duration of live in relationship.
3. Rights of the parties.
4. The legitimacy of the children born from a live-in relationship and their inheritance rights.
5. Children's custody rights.

Despite the fact that live-in relationships need to be regulated urgently in light of the current situation, legislators must simultaneously pay adequate attention to protect the holiness of marriage as well.

Bibliography

Journal Articles

1. Anshul Agarwal, "Live-In Relationships: Have they made marriage redundant", *International Journal of Research and Analysis*, Vol. 1, Issue 2, 2013.
2. Anisa Shaikh, "Need of Special Legislation on Live-In Relationship", *Legal Services India*, January 27, 2012.
3. Nishita Srivastav "Live-In Relationships- An Indian Perspective", *International Journal of Advance Contemporary Research*, Vol. 1, Issue 6, 2015
4. Choudhary Laxmi Narayan, Mridula Narayan, Mridul Deepanshu "Live-In Relationships in India—Legal and Psychological Implications". *Journal of Psychosexual Health*, Vol.3, Issue 1 (2021)
5. Sakshi Singh, "Living Together: The Legal and Sociological Dissection of Non Marital Cohabitation", *International Journal of Advance Contemporary Research*, Vol. 2, Issue 5, 2015
6. Dr. Swarupa N. Dholam, "Socio-Legal Dimensions of Live-In Relationship in India", *Maharashtra Judicial Academy*, 2015.
7. Mohit Chhibber, Aditya Singh, "Live-in relationship: An ethical and a moral dilemma" *International Journal of Applied Research*, Vol. 1, Issue 8, 2015.
8. Ankita Chakraborty, "The Law Relating to Live-In-Relationship in India and the Breach of Promise to Marry" *Asia Pacific Law & Policy Review*, Vol. 3, 2017.
9. Sangita Laha, "Live-in Relationship- An Analysis Through Cases", *International Journal of Arts, Humanities and Management Studies*, Vol. 2, Issue 6, 2016.
10. Prof. Vijender Kumar, *Live-In Relationship: Impact on Marriage and Family Institutions*, (2012) 4 SCCJ-19.
11. Amartya Bag, "Succession Rights in Case of Live-In Relationships: An Analysis in the Indian Context", *KIIT School of Law, KIIT University*, March 30, 2011.
12. Rajesh Hittanagi, "Live-in- Relationship and Indian Judiciary", *Legal Services India*, December 14, 2012
13. Dr. Yuvraj Dilip Patil, "Socio-Legal Perspective of Live-in Relationship in India", *Social Science Research Network*, September 12, 2011.
14. N.T Satish, "Living in Relationship - An Indian Perspective", *International Journal of Health Sciences and Research*, 2014.
15. Caesar Roy, 'Emerging trend of Live-in Relationship in India – A critical analysis', *Criminal Law Journal*, 2012.
16. Dr. (Mrs.) S. Ambika Kumari, Senior Lecturer in Law, 'Effect of westernization on Indian Marriages', *Madras Law Journal*, 2004.

17. Daksha Sharma, 'Live-in Relationships - A Threat to the Institution of Marriage', A.I.R Journal 2009.

Web Links

1. <http://www.revelife.com/708052612/how-do-you-view-living-together-before-marriage/>
2. <https://timesofindia.indiatimes.com/life-&-style/relationships/love-&-sex/single-and-smiling-why-young-indians-are-less-interested-in-getting-married/articleshow/60951266.cms>
3. <https://www.thehindu.com/opinion/op-ed/Comment-article-by-Radhika-Santhanam-and-Sruthisagar-Yamunan-Of-love-and-honour-killings/article62116214.ece>
4. [Indiatoday.intoday.in/story/supreme-court-acknowledgement-live-in-relationships/1/45366.html](http://indiatoday.intoday.in/story/supreme-court-acknowledgement-live-in-relationships/1/45366.html)
5. <http://blog.ipleaders.on/rights-child-born-live-relationship/>
6. www.legallyindia.com/blog/rights-of-maintenance-to-women-live-in-relationships.
7. <http://www.tribuneindia.com/2010/20101022/main7.htm/>
8. <http://famli.blogspot.com/2006/01/adultery-concubinage-and-psychological.html/>
9. <http://www.lawyersclubindia.com/articles/Live-in-relation-Provisions-relating-to-Maintenance-4658.asp/>
10. http://articles.timesofindia.indiatimes.com/2008-12-19/india127922893_live-in-relationships-new-chairperson-girija-vyas-courts/