

Deepak Kumar Verma, NUJS, Kolkata

HINDU ADOPTION LAWS & INTERPRETATION BY DIFFERENT HIGH COURTS.

We believe “Every child has a right to a family” and there is no better a rehabilitation measure for parentless and homeless children than adoption. Adoption is carried out in India under different Acts. In India, adoption of children by Hindu adults is governed by the *Hindu Adoption and Maintenance Act, 1956* (hereinafter referred as “HAMA”). This legislation is enacted to provide the maintenance and all the rights, privileges and responsibilities that are attached to the relationship of the adopted children similar to biological child.

In this report the author will emphasize upon the relevant provision in the HAMA regarding adoption and their different judicial interpretation by different High Courts of the India. The author will also briefly mention the Case-laws decided by the Hon’ble Supreme Court of India in this regard.

There are other legislations which also deal with the adoption:

1. *The Guardians and Wards Act, 1890 (GAWA)*
2. *Juvenile Justice (Care and Protection) Amendment Act, 2010 (J.J. Act)*

Legal provisions
Under HAMA you can adopt a child of each sex but no two children of the same sex which means if you have a son, you can adopt only a female child and vice-versa.
Non Hindu persons such as Muslims, Christians, Parsis and Jews etc. who are governed by their own effected personal laws come under GAWA, 1890.
A third Act has come into force besides HAMA and GAWA in the form of Juvenile Justice (care and protection of children) Act, 2000 under which adoption can also be effected.

Central Adoption Resource Authority (CARA) also has provision regarding the adoption in the Country it facilitates the inter-country adoption and inter-religion adoption.

Why Legal Adoption:

Legal adoption is irrevocable and provides an extended security ring for the adopted child. It ensures the status of the child in the adoptive family. A legally adopted child can enforce all his/her rights in the Court of Law. On the contrary, informal adoptions do not carry any legal enforcement and are gross violation of the law of the land.

As per Supreme Court of India's Direction, specific guidelines have been laid down by the **Central Adoption Resource Authority** (hereinafter referred as **CARA**), the apex controlling body in matter relating to adoption in India under the **Ministry of Women and Child Development** for legal adoption of Indian Children.

In this report the researcher will only deal with the **Hindu Adoption and Maintenance Act, 1956.**

The HAMA only governs Hindus (Buddhists, Jains and Sikhs). The provisions of this Act mandate that a Hindu married couple or unmarried adults can only adopt a Hindu child (son or daughter).

Sr. No.	The objectives of adoption are as follow:
1.	To get old-age protection by the adopted child.
2.	To perpetuate family name and fame.
3.	To keep secured the family property.
4.	To solemnize of last rites and rituals of parents.

Adoption as a legal concept was available only among the members of the Hindu community except where custom permits such adoption for any section of the polity. Only Hindus were allowed to legally adopt the children and the other communities could only act as legal guardians of the children. The religion-specific nature of adoption laws was a very retrograde step. It reinforced practices that were unjust to children and hindered the formation of a Uniform Civil Code.

Justice P.N.Bhagwati in his land mark decision in 1984 on adoption said “no child can grow his full stature, outside the framework of a family.” Article 39 of the Constitution of India directs the government to make special provisions through legislation programme & approaches to ensure that the tender age of children is not abused & that even those living under extremely difficult circumstances are given facilities to develop in a healthy manner & in condition of freedom and dignity. India has the second largest child population in the world and it is estimated that there are over 32, million destitute children in one country.

In consonance with the provisions of the constitution and international commitments the Indian government formulated National Policy on Children, enacted Juvenile Justice Act and ratified the UN Convention on the rights of the child and the national plan of action on children to ensure that childhood is protected against exploitation and against moral and material abandonment.

Section 7 of the Act states **Capacity of a male Hindu to take in adoption** which states that “any male Hindu who is of sound mind and is not a minor has the capacity to take a son or a daughter in adoption.

Provided that, if he has a wife living, he shall not adopt except with the consent of his wife unless the wife has completely and finally renounced the world or has ceased to be a Hindu or has been declared by a court of competent jurisdiction to be of unsound mind.”¹

¹ Section 7 of the HAMA, 1956

In the following table the researcher have focused upon the relevant provision of the Hindu Adoption and Maintenance Act, 1956 and their judicial interpretation by the different High Courts and what is the current position of that particular provision as of now.

SECTION 7 of the ACT and its interpretation by the different HIGH COURTS:

Sr. No.	Name of the High Court	Case Name	Facts	Issue	Decision
1.	Delhi High Court	Ajay Bijli and Anr. Vs. State and Anr., 1999 VIAD (Delhi) 574	Anil (Applicant) has contended that he is the adopted son of Late KM Bijli. Thus, he must be included in the will for the proper adjudication.	1. Whether Valid Adoption required for the purpose of proper adjudication of probate/will for the adopted child? 2. Does <i>adoption ceremony</i> mandatory for a valid adoption?	Held: Applicant failed to establish that there was compliance of provisions of Act, 1956. Applicant has also failed to show that there was any adoption ceremony. Hence, there was no valid adoption. Applicant has no right in the estate of Late Shri KM Bijli.
2.	Madhya Pradesh High Court	Bhooloram and Others Vs. Ramlal and Others 1989 J LJ 387	Appeal filed against the order of trial Court where it was held, adoption was valid. H.C. allowed the appeal and held that adoption was not valid as it was not complied with	1. Whether consent of all the wives is necessary, if a person has more than one wife living at the time of adoption?	Held, the plaintiff failed to establish that he was validly adopted by Ganpat and has any right in the Ganpat's land. Similarly, if a wife has absconded to a unknown place, it cannot be construed as her death in eyes of law unless requirements of Section 107 of Evidence Act are fulfilled -

National Judicial Academy, Bhopal

			the section 4 & 7.		So long as, woman continues to be a wife in eyes of law, her consent is necessary for validity of an adoption under Section 7 of Act.
3.	Allahabad High Court (Lucknow Bench)	Raj Bahadur Singh Vs. Ram Singh and Anr., 2 nd Appeal No. 577 of 1979	Validity of adoption were challenged by the plaintiff (adopter) as Plaintiff argued that his daughter's son cannot be legally adopted by him, defendant had illegally and wrongfully get signed the adoption deed by the plaintiff to usurp the property.	1. Whether son adopted by the plaintiff (father of adopted son's mother) legally valid adoption?	Held, bearing the reflection of a son have the same meaning which have been assigned to them in the <i>Dattak Chandrika</i> and <i>Dattak Mimansa</i> , then it was obvious that anyone, whose mother the adopter could not marry could not be adopted. It was further observed that the expression " <i>Putra Chhaya Waham</i> " dealt with the qualification of the boy to be adopted. In other words, the boy to be adopted Court found that the adoptive father could not have married the mother of the boy who had been adopted and the adoption of the plaintiff's daughter's son by the plaintiff was invalid.
4.	Calcutta High Court	Shrimati Asoka Mukherjee Vs. Gandhi Das and Anr., (2002) 3 CAL LT 307 (HC)	Defendant No. 1 claimed that he is the adopted son of Kalipada and Sabitri Bala, Hence, he should have tenancy rights over the property of deceased father.	1. whether Court of appeal below justified reversing decree of Trial Court and holding that defendant was adopted son of X and Y and erstwhile tenants of suit premises?	Held in absence of evidence of giving and taking ceremony adoption of defendant not proved. It has not been proved that the defendant No. 1 was actually given and taken in adoption by Kalipada and Sabitri Bala. The persons present at the time of adoption did not come forward to depose. Court also said it has been proved that the plaintiff is the owner of the suit premises and the defendant No. 1 has no right, title and interest in respect of suit premises as a tenant inasmuch as his claim that he was

					the adopted son of Kalipada and Sabitri Bala has not been proved.

Section 8 of the Act has been amended in 2010 which serve the purpose of equality when it comes to taking consent with other spouse while adopting a child. *Section 8* (after **amendment in 2010**) talks about **Capacity of a female Hindu to take in adoption** which reads as, “Any female Hindu who is of sound mind and is not a minor has the capacity to take a son or daughter in adoption:

Provided that, if she has a husband living, she shall not adopt a son or daughter except with the consent of her husband unless the husband has completely and finally renounced the world or has ceased to be a Hindu or has been declared by a court of competent jurisdiction to be of unsound mind.”²

SECTION 8 of the ACT and its interpretation by the different HIGH COURTS:

Sr. No.	Name of the High Court	Case Name	Facts	Issue	Decision
---------	------------------------	-----------	-------	-------	----------

²Amendment to the Act in 2010 Available at:

<<http://www.prsindia.org/uploads/media/Acts/The%20Personal%20Laws%20%28Amendment%29%20Act,%202010.pdf>> Last Accessed on May 23rd, 2015

National Judicial Academy, Bhopal

1.	Delhi High Court	Duni Chand etc. Vs. Paras Ram etc., AIR 1970 Delhi 202	Two plaintiffs filed a suit for declaration to challenge the land awarded as a gift on the ground that the plaintiffs were the collaterals of Lehnu (deceased) and that parties were governed by Customary law. It was prayed by the plaintiffs that the gift made by Mahanju in favor of Ram Rattan and Baj Ram should not affect their reversionary rights after the death of Mahajnu.	1. Whether a son adopted by widow would be a <i>preferential heir</i> of deceased husband qua other collaterals? 2. Whether the adopted son absorbed in adoptive family to which the widow belonged, would be the son of the deceased husband also?	Held, The adopted son absorbed in adoptive family to which the widow belonged, would be the son of the deceased husband also - Thus, it was ruled that he will be the preferential heir of the deceased husband, thus, the provisions of clause (c) of the proviso to Section 12 of the Act, Duni Chand (adopted son) could not divest the plaintiffs of the land which had vested in them.
2.	Bombay High Court	Dashrath Ramchandra Vs. Pandu Chila 1977 (79) BOM LR 426	Pandur and Sitabai (Junior Wife) purported to adopt plaintiff No. 3 on July 26, 1964. Manjulabai (Senior Wife), being opposed to that adoption and not having given her consent to the same. Pandu consented to Manjulabai taking defendant No. 5 in adoption. Pandu filed the appeal that def. no. 5 is not validly adopted son of Pandu.	1. Whether, after the coming into force of the Act, a Hindu wife can validly adopt a son even with the consent of her husband?	Held, Since elaborate provisions are made in Section 8, setting out the circumstances under which a wife could have a capacity to adopt and the consent of the husband to enable the wife to adopt is not one of the enabling circumstances under that provision, it would follow that notwithstanding the text or rule of interpretation of Hindu law, after the coming into force of the Act, having regard to the specific provisions of Sections 4, 5 and 8 of the Act, it must be held that a Hindu wife cannot validly adopt even with the consent of her husband.
3.	Madras High Court	R. Ashok and Anr. Vs. R. Bhagavathi Ammal (Deceased) and Ors., (1993) 1	A widow has adopted a son. Her Co-widow is still alive. First widow's adoptive son claiming right in	1. Whether a widow has right to adopt a son and if she has the right to adopt a son then what will be the effect on to his rights (adopted son) in the family property?	

		MLJ 492	the father's estate.		
4.	Karnataka High Court	Babu Nanjappa v. Arunkumar, AIR 1988 Kant 139		1. Whether a son adopted by a widow has right in the deceased father's estate?	Court after taking notice of all relevant authorities on the subject found, on the set of facts that were in the case, that if adoption, after the Act came into force, is found valid, then the question that the adopted son was not born to his father would not be relevant for entitling the adopted child to claim a share in the family property as a coparcener.

This is on the well settled principle that when there are two special Acts dealing with the same subject matter, the legislation which has been enacted subsequently should prevail. The Supreme Court applied this principle in the context of a conflict between the Companies Act 1956 and the Recovery of Debts Due to Banks and Financial Institutions Act, 1993.³

Hence, alternatively, even if there were to be a conflict between the provisions of the Hindu Adoptions and Maintenance Act, 1956 and the Juvenile Justice Act of 2000, it is the latter Act which would prevail.⁴ When the child to be adopted is orphaned, abandoned or surrendered child or a child in need of care and protection as defined in Juvenile Justice Act, the bar imposed by Section 11 (i) and (ii) of Hindu Adoption and Maintenance Act does not bar the Hindu having biological child from adopting the child of same gender.⁵

Based on the judgment in the case of *Lakshmi Kant Pandey*⁶ and Section 41 (3) of the J.J. Act, the **Central Adoption Resources Agency** (in short, 'the CARA'), has framed a set of guidelines. As per the said guidelines, "*in Clause 23(2) thereof, the Specialized Adoption Agency shall file a petition in the competent Court of jurisdiction for obtaining necessary adoption order under the Act, within ten days of acceptance of referral by the prospective adoptive parents and*

³ Allahabad Bank vs. Canara Bank & Another, AIR 2000 SC 1535

⁴ Adoption of Payal @ Sharinee Vinay Pathak and his wife Sonika Sahay @ Pathak, 2010(1) Bom CR 434

⁵ Ibid

⁶ Lakshmi Kant Pandey vs. Union of India (UOI), AIR 1984 SC 469

shall pursue the same regularly with the Court so that the provision of legal adoption is completed at the earliest. The said clause also envisages that the competent Court is required to dispose of the case within a maximum period of two months from the date of filing in accordance with the direction of the Supreme Court in the above case.”⁷

In the above landmark judgment Apex Court set out various principles for care and protection of children who are orphan or abandoned. Moreover, following the aforesaid judgment of the apex Court, the **CARA** guidelines has also specifically prescribed that siblings should be placed in adoption in the same family.

In CARA guideline single male are prohibited from adopting a girl child.

CARA Guidelines and its Judicial Interpretation by different High Courts

Sr. No.	Name of the High Court	Case Name	Facts	Issue	Decision
1.	Andhra Pradesh High Court (Hyderabad Bench)	St. Theresa's Tender Loving Care Home, Hyd. Vs. All Concerned Ors., 2002 (2) ALD 316	Biological parents relinquished child in favour of society. Respondent No. 1 & 2 filed application for adoption of a child relinquished by his biological parents. Both filed this appeal against the order of trial court which dismissed a petition filed under Section 9(4) of the HAMA, 1956 seeking permission to give the minor child - Yashoda born on 23.11.2000 in adoption to the respondents 2. Orphanage Society applied for permission to give	1. Whether in the present case is whether a child relinquished prior to 18.4.2001 is covered by G.O. 16 about? 2. Whether an institution having licence of CARA requires a further recognition under the said G.O.?	Appeal Allowed. Application rejected by Chief Judge as being in violation of G.O. passed on 18.04.2001 - child relinquished by parents prior to 18.04.2001 - society holding valid licence from CARA - Government Order not retrospective. G.O. Dated 18.04.2001 read as: "No institution registered under 'Societies Registration Act, 1860' is permitted to procure detain adopt children and if it is noticed, the Director or Project Director, District Women and Child Development Agency of Women Development and Child Welfare Department shall have the power to take the children into possession, sea! the premises and prosecute such institutions in a Court of law. Provided that the institutions who have been issued 'licence' given and 'recognition accorded shall alone be permitted

⁷ Ibid

National Judicial Academy, Bhopal

			child in adoption.		to keep the children subject to condition and rules specified" Family Court directed to hear case afresh.
2.	Delhi High Court	Child Welfare Committee Vs. Govt. of N.C.T. of Delhi and Ors., 152 (2008) DL T 586	A letter sent to Child Welfare Committee (CWC) was treated as PIL. In the said letter CWC referred to the case concerning the illegal adoption of a male infant born on 13th August 2007 to a girl who was a rape victim as well as a minor.	1. What is the validity of an adoption of a child born to a girl who was raped?	Held, alleged adoption should be in terms of and after following procedure under Sections 40 and 41 of JJ Act which deals with the manner and mode of the process of rehabilitation and adoption of the children who are orphan and abandoned. And said procedure has not been followed - Alleged adoption cannot be accepted as same is not in accordance with the Act. Direction passed by MM Court ignores and fails to consider provisions and object of Act - Therefore directed that custody of child be immediately handed over to CWC who shall take care until Court pass further orders in this regard - Pursuant to order, a detailed report has been submitted to this Court by JJ Board - In view of statement made by victim Court direct that board will employ victim as House Aunty and arrange for her stay in institution to which she will be attached along with her child by relaxing educational qualification - It would be open to victim and her child, as well as board to approach this Court for any directions they may require in connection with this case
3.	Orissa High Court	The Secretary, Subhadra Mahatab Seva Sadan of Kolathia and Another Vs. State of Orissa	This petition was filed against the 2 orders passed by the District Court, Bhubaneswar seeking permission of the learned District Judge for the adoption of two minor female children, namely, Kuni and Gudly by petitioner No. 2 from petitioner no. 1.		Held, Petitioner has followed the guidelines of section 40 & 41 of J.J. Act. Both Kuni and Gudly were under the custody and care of the petitioner No. 1 and being reared as siblings, are now under the petitioner No. 2 pursuant to her executing the Foster Care agreement. Both the said children are in need of care and protection and as already held are required to be rehabilitated and socially reintegrated as early as possible within the period prescribed by placing them in the family by giving them in adoption to the petitioner No. 2 so that such children will feel themselves to be an integral part of the society and will not be looked down upon.

					In view of the above findings, this Court observed that impugned orders are unsustainable and necessary permission should be allowed permitting the petitioner No. 2 to adopt both children.
4.	Rajasthan High Court	Darshana Gupta Vs. None and Ors.	Present appeal filed Under sec. 53 of J.J. Act against lower court's order whereby, Appellant was denied adoption of a child girl.	1. Whether denial order of adoption of child girl to Appellant was maintainable	Held, When the child to be adopted is orphaned, abandoned or surrendered child or a child in need of care and protection as defined in Juvenile Justice Act, the bar imposed by Section 11 (i) and (ii) of Hindu Adoption and Maintenance Act does not bar the Hindu having biological child from adopting the child of same gender. In changed social scenario, Acts were liable to be construed harmoniously to ensure rehabilitation and social reintegration of orphaned, abandoned and surrendered children - Therefore, adoption of child girl to Appellant was held maintainable

Section 9 (2) of the Act have a provision that the **father or the mother, if alive, shall have equal right to give a son or daughter in adoption.**

Section 11 of the Act lays down following other condition/criteria which must be fulfilled:-

1. **According to the Act same sex child cannot be adopted in the family.** If any adoption is of son or daughter, the adoptive father or mother by whom the adoption is made must not have a Hindu son or daughter or son's son or son's daughter (whether biological or by adoption) living at the time of adoption.
2. if the adoption is by a male and the person to be adopted is a female, the adoptive father is at least *twenty-one years* older than the person to be adopted;
3. if the adoption is by a female and the person to be adopted is a male, the adoptive mother is at least *twenty-one years* older than the person to be adopted;
4. a child can be adopted by a couples/single person only.

5. the child to be adopted must be actually given and taken in adoption by the parents or guardian concerned or under their authority with intent to transfer the child from the family of its birth or in the case of an abandoned child or a child whose parentage is not known, from the place or family where it has been brought up to the family of its adoption. Provided that the performance of *datta human* (adoption ceremony), shall not be essential to the validity of an adoption.

Requisites conditions of adoption from orphanage institution:

Who can adopt?

1. You and your spouse are below 45 years of age and your composite age does not exceed 90 years. If beyond 45, you will be required to adopt an older child proportionately to the number of years in excess of 45. However, in no case the age of prospective adoptive parents (PAP) should exceed 55 years.
2. Adoptive parents must be financially stable and must have reasonable regular source of income.
3. They must be physically fit and mentally sound to rear up a child.
4. They must have a genuine motivation to adopt a child.

What is A.C.A?

Adoption Coordinating Agency (ACA) as is popularly known, acts as a link between the prospective adoptive parents and the children waiting to join families in different adoption agencies. Previously known as Voluntary Coordinating Agency (VCA), it actively promotes Indian adoption, creates awareness for popularization of the concept of legal adoption, provides

counseling facilitates adoption activities in the state by coordinating among different stakeholders such as PAPs, prospective Adoptive parents adoption agencies, scrutiny agencies.

State Government, **CARA** and others; ACA maintains a central database on various aspects of adoption at the State level. The Supreme Court Judgment of September 27, 1985 recognized the role of ACAs (then VCAs) and recommended that such agencies to be set up in each state. In case of children not being placed in Indian families, ACA acts as a clearing house their placement abroad. *Sanjog* is the only ACA for the State of Orissa.

Avoid Intra-family Adoptions:

In earlier times childless couples would adopt from extended families. Today, the situation is vastly different as more and more families realize that such adoptions very frequently lead to disharmony within the families over inheritance rights and conflicting emotional ties. The adoptive parents face a situation where they never feel that the child belongs to them completely.

The child also finds it very difficult to accept his/her adoptive parents wholeheartedly knowing that he/ she has surviving birth parents too. As such, the child is caught between the birth parents and the adoptive parents, which often leads to emotional breakdowns and makes the child feel insecure.

Avoid Informal/Private Adoptions:

Never opt for informal or private adoptions as they are a grave breach of the law of the land. No legal procedure is followed, no counseling provided, no track record maintained or no follow up done in such type of adoptions. Legal and health status of the informally adopted child is not ascertained. His/her status in the family always remains that of an abandoned child. Never take a child from hospital/ nursing home, unrecognized agencies or from public places for the purpose of adoption. It may land persons concerned into serious legal complications.

Process of Legal Adoption:

Only legally free children (having no claimants) can be placed in adoption. Once a child becomes legally free, the process of identifying a suitable family for placement of the child begins. PAPs need to prepare the required documents following which a home visit is conducted

to assess their suitability for parenting a child. When documents are complete in all respect the PAPs are invited to see the child and can take the child for medical test.

When the PAPs select a child, they can take the child for medical test, submitting all the required documents and signing a foster care agreement pending the finalization of their adoption case in the court of law. A miscellaneous case is then filed in the appropriate court. Documents are sent to the scrutiny committee by the court for verification when the scrutiny committee clears the case, documents are returned back to the court with its recommendations and then a date for hearing is fixed.

The court, when satisfied, passes adoption order giving permanent custody of the child to the adoptive parents. Within two months from issue of the order an adoption deed is made, which marks the end of the legal process of adoption. After completion of the Deed, adoptive parents can apply for birth certificate of the child.

Hindu Adoption and Maintenance Act, 1956

No adoption shall be valid unless following conditions are fulfilled:

- (i) The person adopting has the capacity and also the right, to take in adoption.
- (ii) The person giving in adoption has the capacity to do so.
- (iii) The person adopted is capable of being taken in adoption and
- (iv) The adoption is made in compliance with the other conditions mentioned in this act.

Persons capable of giving in adoption:

(1) No person except the father or mother or the guardian of a child shall have the capacity to give the child in adoption.

(2) Where both the father and mother are dead or have finally renounced the world or have abandoned the child or have been declared by a court of competent jurisdiction to be of unsound mind or where the parentage of the child is not known, the guardian of the child may give the child in adoption with the previous permission of the court to any person including the guardian himself.

(3) Before granting permission to guardian for adoption the court shall be satisfied that the adoption will be for the welfare of the child, due consideration being for this purpose given to the wishes of the child having regard to the age and understanding of the child and that the applicant for permission has not received or agreed to receive and that no person has made or given or agreed to make or give to the applicant any payment or reward in consideration of the adoption except such as the court may sanction.

Persons who may be adopted:

No person shall be capable of being taken in adoption unless the following conditions are fulfilled namely:

(i) He or she is a Hindu

(ii) He or she has not already be adopted earlier

(iii) He or she has not married unless there is a custom or usage applicable to the parties which permits persons who are married being taken in adoption.

(iv) He or she has not completed the age of fifteen years, unless there is a custom or usage applicable to the parties which permits persons who have completed the age of fifteen years being taken in adoption.

Limitation of HAMA:

Today child adoption in India is being governed by the *Hindu Adoption and Maintenance Act, 1956*.

1. HAMA is not child oriented but parent oriented It is a religion specific Act.
2. It does not allow adoption of two children of the same sex by one adoptive couple.
3. It does not allow for adoption of a child of the same sex as the biological child.
4. The adoptive mother is only a consenting party and not a joint petitioner.

Conclusion:

Above all adoption agencies play the most crucial role in child adoption. They should appoint dedicated and service oriented responsible personnel having clear-cut knowledge of child rearing so that they will be able to foster natural mothering care with love and affection. Adoption institutions should promote adoption work by building social awareness among the parents. They should create a positive congenial social atmosphere for the purpose of adoption. Moreover the international adoption of Indian children should be encouraged with careful attention and by following strict measures so that the malpractice by foreign couples regarding adoption can be checked.

The nation's children are supreme important asset. Their nurture and solitude are responsibilities of nation. Children's programmes should find a prominent part in national plans for the development of human resources so that children grow up to become robust citizens; physically fit, mentally alert and morally healthy endowed with the skills and motivation needed by the society. Equal opportunities for development to all children are the aim, as this will serve larger purposes of reducing inequality and increasing social justice.

Bibliography/References

1. Hindu Adoption and Maintenance Act, 1956

2. Supreme Court's Judgment in the case of Lakshmi Kant Pandey.
3. CARA'S official website: Available at: (www.adoptionIndia.nic.in).
4. CARA Guidelines, 2011: <http://www.adoptionindia.nic.in/guideline-family/Overview.html>