



Research Article

Negotiating Gender Justice: Women's Rights, Law, and Social Transformation in India and Iran

Dr. Shamsa Naqvi

Independent Research Scholar, India



ARTICLE INFO

ABSTRACT



Keywords:

Gender Justice, Women Rights, India, Iran, Gender Equality, Social Transformation, Human Rights, Legal Reform

Article History:

Received: 12-05-2026

Revised: 20-06-2026

Accepted: 25-06-2026

Published: 01-07-2026

Gender equality is a key issue in the current discussion on human rights, legal change and social change. Although there has been a lot of progress in international norms and principles, and in other ways women's rights are advancing, in many societies they still face structural barriers that stem from historical, cultural and religious traditions. The paper delves into the changing landscape of women rights in India and Iran from a comparative socio-legal perspective. It examines how the laws; religious teachings and the state policies have influenced women's rights and opportunities in both the countries. Attempts to rectify gender inequalities in inheritance, marriage, employment, political participation and protection from violence in India have included constitutional protections, legislative changes, and judicial rulings. In a similar way, there have been significant discussions and changes in Iran with regard to the rights of women in Islamic jurisprudence in aspects such as family law, education, employment and public involvement. The study suggests that although both countries have enacted legislation and policies related to women's status, the enforcement and realisation of rights are sometimes limited by patriarchal social structures and culturally rooted gender norms. Comparative analysis of legal reform in the context of substantive equality shows that legal reform is not the only way to create substantive equality without broader social and institutional reform. The paper also emphasizes the dichotomy of tradition and modernity, and shows how women in both societies are still entangled in a legal and cultural labyrinth negotiating their rights. This study builds on an understanding of the challenges and opportunities of promoting gender justice in various socio-political settings through an examination of the intersection of law, religion and social change.

Cite this article:

Naqvi, S. (2026). Negotiating Gender Justice: Women's Rights, Law, and Social Transformation in India and Iran. *Sprin Journal of Arts, Humanities and Social Sciences*, 5(2), 17–26. <https://doi.org/10.55559/sjahss.v5i2.661>

Introduction

There is a growing consensus that gender justice is one of the most important issues of the modern world, and plays a pivotal role in all debates on human rights, democracy, social development and legal reform. Throughout history, women in different societies have been discriminated, excluded and subordinated, with explanations that are based on culture, religion, and institutions. Despite the significant strides made during the twentieth and twenty-first centuries in the promotion of women's rights on the national and international level, the struggle for substantive gender equality continues. Despite the achievement of legal gender equality, social and cultural barriers remain that have an enduring impact on women's public and private life (Mansour 2014). The international human rights discussion has started to build momentum after the adoption of international human rights instruments such as the Universal Declaration of Human Rights (1948), the International Covenant on Civil and Political Rights (1966), the International Covenant on Economic, Social and Cultural Rights (1966), and Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1979). These comprised the principle that women and men have equal rights, opportunities and protection

under the law. Yet, the realization of these aspirations has been very different in different countries depending on their political, legal, religious and socio-cultural characteristics. Therefore, an investigation into women's rights must not only examine the legal provisions but also the social context in which the laws are applied.

There are interesting comparative case studies in India and Iran related to gender justice. The legal and social systems of both countries are deeply influenced by their ancient civilizations, cultural traditions and religious beliefs. Despite the parallels, they have had separate political and legal paths to take in pursuing women's rights. India is a secular democratic republic with legal pluralism, meaning that the personal laws of various religious communities govern marriage, divorce, inheritance and family relationships. By contrast, Iran has an Islamic political system in which various elements of the family and personal status law serve to be informed by Sharia interpretations. These differences in legal bases provide a special opportunity to explore the negotiation of women's rights in various socio-political contexts. In the past, women had complex and contradictory roles in both Indian and Iranian society. The ancient Indian society had a relatively strong position for women, as seen in the Vedic texts, where they are

*Corresponding Author:

✉ shamsa11@gmail.com (Dr. S. Naqvi)

🌐 <https://doi.org/10.55559/sjahss.v5i2.661>

© 2026 The Authors. Published by Sprin Publisher, India. This is an open access article published under the CC-BY license

📄 <https://creativecommons.org/licenses/by/4.0>

known to attend religious rituals, study and engage in intellectual discussions (Dwivedi & Malik, 2022). Strong evidence shows that women were able to get an education, have philosophical discussions, and have some rights to property. The autonomous status and role of women, however, began to diminish as a result of the progressive strengthening of the patriarchal social structures. The situation of women was further reinforced by the emergence of phenomena like child marriage, restricted inheritance rights and limited access to public life. Religious teaching and traditional practices over time reinforced gender inequalities by limiting women's access to resources and decision-making processes (Ayub & Raina, 2018). Women's situation in Iran, too, is a product of a complex interplay of social transformation, law and religion. Islam has given some safeguards to women in the matters of inheritance, marriage and property ownership where few societies provided them. Islamic law accorded women the legal rights to inheritance and maintenance, thus creating a legal system intended to enhance their social status. The principles and what they mean have changed through history and politics, though. After the Iranian Revolution of 1979, the government has based its legislation on Islamic law and has experienced a great deal of controversy about the rights and roles of women in society (Sanasarian, 1982). As a result, the role of women in Iran has been subjected to a constant process of negotiation between religion, state policy and equality demands.

Gender justice is more than just formal recognition of rights. It includes the wider goal of fair, dignified, equal and discrimination free living. Gender justice goes beyond ensuring equal treatment before the law; it is even more about removing barriers in structures that hinder women's effective and full enjoyment of their rights. It is argued by more and more scholars that if there is to be any real change, there must be social, economic, and political empowerment as well as legal equality (Moghadam, 1991). Therefore, an overall evaluation of women's status should take into account the legal frameworks as well as lived realities. India had many important legislative changes to improve women's status since independence. The state has manifested its desire for gender equality in the laws concerning inheritance, marriage, domestic violence, workplace harassment, dowry practices, and political participation. The Constitution provides for equality before the law and against discrimination on the basis of sex. Progressive interpretations of constitutional principles have also further extended women's rights, and judicial activism can be seen as a means of doing this. However, there remain problems with gendered violence, unequal access to resources, wage gaps and social norms that continue to perpetuate gender inequalities. Legal rights and social realities are a significant problem in assessing the effectiveness of the gender reforms. Likewise, there have been gains and challenges in the quest for gender justice for Iranian women. The educational attainment, professional engagement and civic involvement of women have increased significantly in the last few decades. Meanwhile, discussions are ongoing about family law, inheritance, marriage laws, political representation, and personal freedoms. Iranian women have been active in demanding legal changes and social engagement, frequently taking on a confrontational attitude to traditional readings of religious law. The changes show how constantly women's rights are negotiated in Iran and how the interpretation of equality is evolving and in constant dialogue with tradition and religion. It is especially pertinent to make a comparison between India and Iran as it will open a window on how similar issues related to gender, rights and social change are being dealt with by two legal systems. Although India's legal system is secular and respects legal pluralism, this is not the case for Iran, where the Islamic legal tradition dominates a contemporary nation-state environment. Yet there are certain

similarities as well as differences that women in both societies do face challenges due to patriarchal systems, unequal power relations, and socio-cultural expectations. A comparison of the commonalities and the differences helps to develop a deeper understanding of gender justice and conditions that support or impede women's empowerment.

The present study is based on the premise that law serves as a tool for social control and as a tool for social change. Legal reform can make a difference in changing gender relations by creating opportunities and rights. But they work only when they are accepted by society at large, adopted by institutions and adapted by culture. Thus, the issue of law and social change continues to be important in any evaluation of women's rights. This research examines the experiences of India and Iran to try to determine how much legal reforms have helped to achieve gender justice and the problems that remain in the way of substantive equality. The paper therefore explores the historical development of women's rights, the impact of religious and legal traditions, the development of modern legal protections, and the broader dynamics of social change which have impacted women in India and Iran. It aims to highlight what has been done well and what has not in the quest for gender justice, and to make a contribution to the academic debate on the role of law in advancing women's empowerment and equality on this basis.

Review of Literature

There has been a great deal of scholarly interest in the topic of women's rights in various fields such as history, sociology, law, political science, and gender studies. The literature shows that the status of women is affected by the interplay of legal frameworks, religious practices, culture and socio-economic systems. There has been a growing focus on scholars and scholars' scholars on the need for a social shift, one that goes beyond the mere enactment of legal changes, to achieve gender justice. In this respect, some research done in India and Iran are important to the study of the changing relationship between women, law and society. A short survey of the Indian literature reveals that women's position has changed from one era to another. Dwivedi and Malik (2022) believe that women in the Vedic period had access to education, religious practices and intellectual pursuits, thus having a relatively respected social status. Likewise, Ayub and Raina (2018) note that women were given more social recognition and participation in ancient Indian society than their roles in the modern day portray. But later on, as socio-cultural changes took place and patriarchal institutions were strengthened, women's autonomy and public presence were progressively diminished and limited. Overall, these studies serve as evidence that gender inequality in India is not a static condition, but is a historically evolving process in response to changing political and social contexts.

Much of the literature has been devoted to the debate on the law and women's rights in modern India. According to Agarwal (1994), the significance of property and inheritance rights as the basic methods to strengthen women's economic autonomy and negotiating power inside the house is highlighted. Equality as an explicit constitutional provision and legislation on domestic violence, employment discrimination, dowry abuse and political participation have been discussed by others as well. Despite all these changes in the law, studies have consistently found that there is a disconnect between legal provisions and application. Despite legal progress, gender-based violence, unequal access to resources and discriminatory social practices still exists and hinder the transformative effect of legal changes, especially within the most marginalised communities.

The interaction between Islamic law, state policy and women's rights has been studied in the Iranian context. One of the earlier

comprehensive discussions on women's movement in Iran is by Sanasarian (1982) which focuses on the difficulties facing women in the wake of political and legal changes brought about by the Islamic Revolution. In post-revolutionary Iran, too, Moghadam (1991) shows how gender inequality was perpetuated through institutional arrangements that limited women's autonomy in some aspects of their social and family lives. Other research, however, has also highlighted the agency and resilience of Iranian women, particularly in education, civil society and professional contexts. The development in the process points to women's conscious efforts to negotiate their way to empowerment in spite of the legal and cultural barriers.

There has been a lot of research and debate about the effect of religion on women's rights. According to Abou El Fadl (2001), many of the restrictions imposed upon women are not the ones laid down in the religious scriptures but rather the ones attributed to them by patriarchal interpreters. Likewise, Mansour (2014) contends that the role of women in Muslim societies must be analysed with reference not just to Islamic law, but to how Islamic law has been interpreted, what interests it serves and how it has been shaped by cultural traditions. Gender equality challenges were to challenge the assumptions that the problem of gender inequality lies solely in religion and to place attention on the historical and social context in which women live. The legacy of feminist scholarship has been important in the understanding of the persistence of gender inequality despite legal reform. Kandiyoti (1988) argues in her seminal study of "patriarchal bargaining" that women negotiate rights and opportunities within the existing system of patriarchy, instead of challenging it frontally. Similarly, Bhasin (2006) defines patriarchy as a social structure, which is part of institutions, cultural practices and family relations. Therefore, the above views argue that legal change is likely to face opposition due to the impact it poses to the social norms and power relations that have become entrenched in society. Thus changes in law are needed, but changes in attitudes and institutional practices are also necessary for achieving gender justice.

Recent research more and more focuses on empowerment as a multi-dimensional process. Kabeer (1999) maintains that empowerment is also about access to resources, about the ability to decide things and about the ability to achieve desired outcomes. In the same way, Nussbaum (2000) emphasizes substantive freedoms and opportunities, as opposed to simply formal legal rights. These theories are more pertinent to the comparative study of India and Iran as they go beyond the legal provisions to the conditions under which women can effectively exercise their rights. Gender and its intersections with other social categories is another theme that has been prominent in the literature. Chakravarti (2003) finds that caste, class and social hierarchy have a significant impact on women's lives in India, creating many and layered forms of disadvantage. The same arguments have been advanced as regards the impact of ethnicity, socio-economic status and regional differences on women's lives in Iran. These types of studies have shown that there is no one single lens on gender justice; it must be considered through a variety of lenses, and a lens on the experiences of women in various social places. Existing literature offers important insights regarding the rights of women in India and Iran but has some gaps. The majority of the scholarship is on a country-by-country basis, so there is less comparative engagement between the two contexts. Moreover, previous research usually focuses on legal reform or religious factors or social change, rather than on their interconnections. A focus is also seen on specific issues pertaining to women's rights (e.g., inheritance, marriage, political participation) rather than a comprehensive evaluation of how legal and social changes work together to affect gender justice. In this context, a comparative

study of India and Iran provides a chance to fill these lacunas and further understand the nexus between women's rights, law and social change.

Research Gap

The available literature on women rights in India and Iran has made great contributions to the understanding of the evolution of gender relations, legal changes and socio-cultural changes in relation to the status of women. The following studies have explored constitutional protection, personal law, feminist movements, women's education, women's political engagement, and the influence of religion on women's experience. Yet, many of these studies are limited in scope, often just country-specific analyses, leaving us with a disjointed picture of the various legal and cultural approaches to resolving the issue of gender justice. A number of scholars have studied the role of women in India and Iran separately and comparatively fewer scholars have studied both societies in a systematic way within a common analytical framework. Thus, there is a need for research which investigates the nexus of law, religion and social change in the two different but similar settings. Another constraint in current scholarship is the overemphasis on the legal aspects of the rules and ignoring the practical consequences. While debates over legislative reforms and constitutional guarantees are often heard, less focus has been given to grasping the interaction between these legal measures and social norms, cultural practices, and institutional structures. Although gender inequality has been greatly reduced in the law, it remains in practice, suggesting that there is no automatic link between formal equality and substantive equality. The link between legal rights and lived experiences is under-researched, especially in comparative studies of such rights. In addition, studies on women's rights, where they have been discussed at all, tend to focus on a single aspect of rights, such as inheritance, marriage or political participation, and do not adequately cover women's rights as a multi-dimensional issue. The current study is an attempt to fill the aforementioned gaps by studying the dynamic interplay of women's rights, legal institutions and social change in India and Iran from a comparative socio-legal lens.

In this context, the study is guided by several basic research questions such as: In this context, the study is guided by the following basic research questions: It aims to look into the historical, legal and religious background of the evolution of women's rights in India and Iran. It also examines how far the legal changes have extended gender justice in both countries and the social, cultural and institutional issues which remain obstacles to women's equality. The study also seeks to explore the nature of women's struggles for rights in a range of legal and socio-cultural settings and whether or not there has been any social transformation. The main goal of this research is to examine the development of the women's rights in India and Iran in a comparative perspective. It aims specifically to look at the historical roots of gender relations in both societies, at the part that law has played in advancing women's rights, at the impact of religion and culture on the achievement of gender justice, and at the opportunities and obstacles of current processes of social change. The study also seeks to make a wider contribution to the academic debate on the intersection of law, gender equality and social change by showcasing commonalities as well as unique characteristics of the Indian and Iranian experiences.

Methodology

The method used in this research is qualitative and comparative method. This study has been drawn from secondary sources, such as scholarly books, peer-reviewed journal articles, legal documents, constitutional provisions, policy reports, international human rights instruments and relevant historical literature. A comparative socio-legal approach has been used to

examine the development of women's rights in India and Iran, and the impact of legal reforms on social realities. Comparative analysis allows similarities and differences to be identified between the approaches both countries take to issues of gender justice in spite of their different political, religious and legal systems. The study also employs descriptive and analytical techniques to understand the prevailing literature and legal landscape and to evaluate the success of different strategies to enhance status for women. The study aims to present a picture of the current process of negotiation between gender justice in India and Iran by combining the analysis of historical time with the contemporary socio-legal time.

Historical Evolution of Women's Rights in India and Iran

The path of women's rights in India and Iran is a result of a complex intermingling of religious traditions, political changes, legal institutions and social structures. Women's role in both societies have changed in varying periods of history, showing that gender relations are not uniform or fixed. Instead, they have been continually influenced and developed by changing legal interpretation, cultural norms, religion, and state policy. These past narratives are crucial in addressing current dialogues about gender justice and women's rights.

From a historical perspective, there is evidence of women having a relatively prominent role in the early Vedic period of India. There is evidence in literature that women were involved in religious ceremonies, educated, and involved in philosophy. The participation of women in intellectual discourses has been mentioned in the Vedic literature, such as that of Gargi and Maitreyi, indicating that women were not completely absent from public and educational life (Dwivedi & Malik, 2022; Altekar, 1956). Historians warn, however, that not every female enjoyed these privileges and that some could actually differ depending on class and location. However, there is evidence available that during this period of time women enjoyed more social visibility and had more educational opportunities than in many later historical periods (Ayub & Raina, 2018). During the late Vedic and post-Vedic era, the role of women slowly evolved. The scholars have linked this change with the emergence of patriarchal family system, rising social stratification and the rise of religious and traditional institutions. The level of education to which girls can have access was reduced, the role of women in public life was further curtailed, and family structures have stronger emphasis on the role of males (Sharma, 2002). Historical studies have indicated that child marriage, and restrictions on women's inheritance rights became more visible during these times, further limiting women's social and economic autonomy (Chakravarti, 1993). As Uma Chakravarti (1993) notes, the formation of Brahmanical patriarchy was an important factor in controlling women's sexuality, work and status in society.

In the medieval period, women's role was shaped by a variety of political, social and cultural elements. Historians have recorded that women's mobility and public engagement was further curtailed due to social insecurity, wars and the strengthening of patriarchal traditions (Altekar 1956). The practice of purdah increased in some parts and among some groups, but was not widely used in all social groups. During the same period, influential women in religious, literary and political fields also emerged in medieval India. Spiritual expression through the works of bhakti saints like Mirabai, challenged the conventional gender norms, even as social norms existed, women exercised agency (Tharu & Lalita, 1991).

The 1800s were a watershed period in the progress of women's rights in India. The colonial rule brought about much discussion on social reform, education, and the status of women. Raja Ram Mohan Roy and other reformers fought against sati and it was

abolished in 1829, Ishwar Chandra Vidyasagar championed widow marriage and women education (Forbes, 1996). Jyotirao Phule and Savitribai Phule also stressed the role of education in liberating the women and the outcaste communities socially. While these reform movements did not end gender inequality, they did mark the beginning of some important debates about the rights of women and social justice that would affect future legal and political changes (Forbes, 1996). Women's presence in the Indian nationalist movement further enlarged their role in the public sphere. In the freedom movement, women participated in protest, civil disobedience movement, and political activities, which disrupted the norms of the society. In the freedom movement, women took part in protest, civil disobedience movement, political organizations and broke the norms of the society. Nationalist politics is seen as playing a major role in shaping women's active citizenship and political roles (Forbes, 1996). Colonialism's end thus opened the door to new opportunities for women's involvement in public life.

The Constitution of India, 1950, was a milestone in the progress of women's rights. Articles 14, 15 and 16 guaranteed equalities before the law, prohibition of discrimination based on sex, and equality of opportunity in public employment (Government of India, 1950). Later, legislations such as Hindu Marriage Act (1955), Hindu Succession Act (1956), Dowry Prohibition Act (1961), and amendments to these laws involving domestic violence and harassment at work aimed at increasing women's legal rights. However, as has been pointed out by scholars, the actual enforcement of these rights has been uneven, because of the continued social inequalities and patriarchal attitudes (Agarwal, 1994; Menon, 2004).

There are parallels and differences in the history of the rights of women in Iran. Ancient Persia gives evidence that women had some legal and economic rights, which depended on class, family position and the period in history. Studies of the Sassanian period show that women played well-defined roles in familial and inheritance systems but were still very much entrenched in social structures (Emami & Mirderikvand, 2018). Hence the legal position of women in ancient Iran was a mixture of rights and restrictions determined by religious and social norms of the time. Women's role in public was still limited in the social context, which was mainly male, during the Qajar period (1789–1925). The opportunities for education were low and there was little political engagement. By the late 1800's however, there were reformist discussions about women's education and social status. The intellectuals found it increasingly possible to associate the development of the nation with the development of the women, and thus they laid the foundations for the development of feminist activities (Afary, 1996). An important turning point was the Constitutional Revolution of 1905–1911. Women were not given a right to vote, but they did take part in demonstrations, fundraisers, nationalist movements, and educational and social groups. This time is considered the start of organized women activism in modern Iran by historians.

Afary (1999) finds that the women's movement that arose during the Constitutional Revolution wanted to improve their access to education, employment, public life, and marriage and family law reform. In spite of the many legal and social limitations, women formed associations, published journals, and started schools for women, broadening their participation in public life.

The Pahlavi dynasty (1925–1979) ushered in a new wave of transformation. The educational system adopted by the establishment of Reza Shah increased educational opportunities for women and encouraged their participation in public institutions. Women were eventually granted the right to vote in 1963 and were given more opportunities for higher education and

professional jobs during Mohammad Reza Shah's reign. The Family Protection Laws of 1967 and 1975 brought about major changes in marriage, divorce, custody, and polygyny, which were some of the most significant legal reforms for women in modern Iranian history. These reforms are considered to have played crucial roles in the advancement of women's legal rights.

In 1979, the Islamic Revolution had a dramatic impact on the legal and political landscape of women. A number of changes which were introduced under the Pahlavi era were either adjusted or abolished, especially those in the field of family law. Esfandiari (2010) reported that the suspension of the Family Protection Law made a significant impact on the legal status of women in areas like marriage, divorce and family relations with new regulations based on Islamic jurisprudence. Meanwhile, however, Iranian women have gone on to seek education, jobs, and civic engagement, inventing new modes of action in the post-revolutionary context.

Modern research has focused on the fact that Iranian women are still active in the campaigns for legal reform and social equality. Women's groups, lawyers, press, and academics have resisted and sought to expand the scope of women's rights in Islamic and constitutional law. In these efforts, Iran's women's rights history is not only a tale of limitation but also one of resilience, adaptation, and ongoing negotiation. A comparison of India and Iran shows that there were some similarities of importance. For both societies, there was a dynamic of women's participation in some periods and increasing patriarchal control in other periods. Social reform movements were a vital force in questioning discriminatory practices and in promoting opportunities for women in the educational and legal arenas. The twentieth century saw further legal changes, promoted by both countries, with the aim of enhancing the position of women. However, in all instances, social opposition emerged alongside legal change, highlighting the need for more than just the power of legislation to achieve gender justice.

Meanwhile, some significant differences still exist. Secularism in the Indian Constitution and democratic legal reform in post-independence India has been the major influence while the contemporary Islamic legal framework in Iran has been the product of interaction between constitutional governance and Islamic jurisprudence. The varying institutional settings have been found to generate varying responses to women's rights and similar discussions about equality, citizenship, family law and social involvement. The study of the history of women's rights in both countries thus shows how far there has been a transformation from tradition to reform, and how gender justice is a continuous and evolving process.

Women's Rights and Legal Frameworks in India and Iran: A Comparative Analysis

The legal rights of women is one of the most significant measures of a society's dedication to gender justice. Laws are not only about the way people relate to one another in social relations, but also tell of a wider ideological interpretation of equality, citizenship and social order. Women's rights in both countries India and Iran are influenced by the Constitution, family laws, labour laws and judicial interpretations. Both countries have experienced constitutional and legal change, and there are also significant differences in the constitutional and legal bases of the two countries. However, social norms, religious interpretations and institutional practices continue to shape how these reforms will be successful. A comparative study of their legal frameworks can thus offer useful insights into opportunities and constraints for achieving gender justice.

The Constitution of India has laid a solid foundation for gender equality. The Constitution of India, Article 14 guarantees

equality before the law and equal protection of the laws to all citizens, and Article 15 bars discrimination based on religion, race, caste, sex and place of birth (Government of India, 1950). Moreover, Article 15(3) affords the state the right to take special measures concerning women and children in order to remove historical inequalities. Article 16 provides constitutional protection for equality of opportunity in public services, thus providing a constitutional framework for women's involvement in public institutions (Government of India, 1950). It has been suggested that the provisions taken together constitute one of the most extensive constitutional guarantees of gender equality in the developing world (Agnes, 2011). However, the Constitution of the Islamic Republic of Iran takes a contrasting stance to women's rights. Under Islamic criteria, under Article 20, all citizens, both men and women, have the equal protection of the law. Article 21 of the Constitution of Islamic Republic of Iran, 1979, explicitly mandates the government to ensure women's rights in all aspects in accordance with Islamic principles and that the government sets favorable conditions for the development of women. Though these provisions acknowledge women's rights, scholars point to the fact that the constitution's focus on Islamic criteria provides a framework in which gender equality is understood not in terms of a secular notion of equality, but in terms of Islamic jurisprudence (Moghadam, 2003). As such, discussions about women's rights in Iran frequently hinge on differing understandings of the roles of Islamic law and the constitution.

Family law is still one of the most controversial fields in the discussion of women's rights in both countries. In India, the family is ruled by a system of legal pluralism and different religious communities have different personal laws. The Hindu Marriage Act of 1955 brought in significant changes in the law of marriage, divorce and maintenance, and the Hindu Succession Act of 1956 was to enhance the position of women in regard to inheritance (Government of India, 1955; Government of India, 1956). A significant change came with the Hindu Succession (Amendment) Act of 2005 that extended the coparcenary rights to daughters as well as to sons in ancestral property, thereby reinforcing women's economic rights within the family (Agarwal, 2018). It is one of the most important changes in gender justice and property rights in modern-day India that legal scholars have pointed out (Agarwal, 2018). Yet, there are still obstacles to continued progress. Debates still exist around Muslim, Christian and other personal laws, regarding matters of marriage, divorce, inheritance and maintenance. The Supreme Court of India has repeatedly taken a decision on various aspects concerning the rights and privileges of women, highlighting the notions of equality and dignity enshrined in its Constitution. The landmark judgment of Shayara Bano v Union of India (2017), which declared the practice of instant triple talaq as unconstitutional, is an example of the judiciary's increasing role in the protection of women's rights in personal law systems (Supreme Court of India 2017). Family law is also a pivotal topic in the discourse on women's rights in Iran. The Iranian family law is greatly based on Ja'fari Shi'a jurisprudence and includes matters of marriage, divorce, guardianship and inheritance. Women's rights of marriage and inheritance are acknowledged under the Iranian Civil Code and sometimes divided from that of men (Mir-Hosseini 2000). Women, for instance, typically receive less of the inheritance than men in similar situations, which is a result of the traditional understanding of Islamic inheritance law (Mir-Hosseini, 2000). Traditionally, divorce has given more power to the man, but there have been some changes that extend certain of the legal powers granted to women. As family law is one of the main fields where gender equality and religious interpretation issues are still being debated in Iran, scholars say (Moghadam 2003).

Another key aspect of gender justice is property and inheritance rights. It is generally acknowledged that women need to be economically independent to achieve empowerment and social autonomy (Agarwal, 1994). The Hindu Succession (Amendment) Act, 2005 in India gave a substantial boost to the rights of women in respect of their inheritance rights, and equal rights were given to daughters, in relation to property of a joint family. Empirical research indicates that the secure property rights of women can have a positive impact on their bargaining power, economic security, and decision making within the household (Agarwal, 1994). However, social practices and customary law can prevent women from enjoying these rights, especially in rural areas.

Inheritance rights are covered by Islamic law in Iran and women have legal rights to inherit from their parents, spouses and other relatives. Generally, however, inheritance is not equal for men and women, as it is today in the country's legal framework (Mir-Hosseini, 2000). While women are not barred from inheriting property, it is believed that the unequal distribution of ownership is a result of the law governing complementary instead of equal gender roles (Mayer, 1999). The distinction is still a topic of ongoing contention within the Legal, Women's rights and Religious circles.

One of the areas of greatest improvement for women in both countries has been in education. The Constitution of India and later the educational policies have been in favor of providing universal access to education irrespective of gender. The overall situation of female literacy rate and education level have improved significantly since achieving independence, but there are regional and socio-economic differences (Government of India, 2021). In the same way, women's education has made tremendous advances in Iran during the last few decades. Despite legal and social barriers, it is notable that women are an important share of university students, and have been successful in higher education (Moghadam, 2003). Women's participation in the labour force and their civic involvement have also risen, as have their rights awareness, in both countries in the context of educational development.

Labour rights and employment opportunities is another key component of women's legal rights. The Equal Remuneration Act, 1976, the Maternity Benefit Act, 1961 (as amended) and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, are some of the legislations put in place in India to protect the rights of women from exploitation and discrimination in the workplace (Government of India, 2013). Yet, gender gaps in pay, gender occupational segregation and women's underrepresentation in the labour force remain (ILO, 2018). There has therefore not always been an economic equality in actual reality.

Women's education and labour capacity is also recognized in Iranian law and women have now begun to take up jobs in professional areas such as medicine, education, engineering and public administration (Moghadam, 2003). However, the legal restrictions and the expectations and norms related to gender roles and family responsibilities continue to influence participation in the labour market. Although women in Iran have high educational achievements, high level of economic empowerment is often hindered by structural and institutional barriers that limit their opportunities (Kar, 2012).

Another relevant indicator of women's status in legal/institutional frameworks is political participation. The 73rd and 74th Constitutional Amendments in India granted reservations to women in the local self-governance institutions. This resulted in the higher presence of women in the governance structure, both in rural and in urban settings (Government of

India, 1992). Ongoing work to bolster political inclusion is also illustrated by recent legislative developments to boost women's participation in national and state government.

Iranian women were given the right to vote in 1963, which has been utilized by them in an active way since then. Women have been members of parliament, local councils and other governmental bodies. Yet, scholars have remarked that women do not seem to be on the rise in higher political offices and institutional barriers to women's political participation still exist (Moghadam, 2003). Whether legal and political barriers hinder or support women's leadership is an issue that continues to be debated.

The analysis shows that, both India and Iran have set up legal frameworks to acknowledge women's rights in different fields. But they have different philosophies underpinning them. While secularism and equality are the core values of the Indian legal system, Iran's legal system is rooted in rights within the framework of Islamic law. However, both countries face similar issues due to the patriarchal social norms, unequal power dynamics, and disparities between legal rights and social realities. Therefore, the impact of legal reform will rely not only on the legal device, but also on social changes, which can ensure the effective implementation of women's rights in a meaningful way.

Negotiating Gender Justice in Contemporary India and Iran

In the present debates on the issue of gender justice, the connection between law and social change plays a crucial role. Although legal changes are commonly seen as key tools to encourage equality, they will only work if there are the right social contexts in which they are implemented. Rights can be created by law, discrimination can be banned by law, and reparation can be outlined in law, but not every deeply entrenched social norm and power structure will be eliminated by law. Therefore, the intersection of legal systems and social change needs to be explored to address gender justice. In both countries, India and Iran, the quest for women's rights is a case of how law, social values, and practices interplay (Kabeer, 1999).

There have been long debates about the role gender discrimination plays in sustaining gender inequality, not just through the law, but also through social institutions that affect daily life. The concept of patriarchy – defined as a social system which gives a preference to male power and control – still affects family systems, economic transactions, participation in politics, and cultural life in many societies (Bhasin, 2006). While the legal frameworks of both countries (India and Iran) have made efforts to overcome unfair treatment in society, the patriarchal norms still remain entrenched in family, community, and institutional life. This continuity proves that social changes are slow and take place outside of legislation and involve changes in attitudes, values and power relations. (Kandiyoti, 1988).

The Constitution of India and legal reforms have established a comprehensive system of women's rights in India. Domestic violence, workplace harassment, inheritance, and political representation laws are only a few examples of consistent initiatives to ensure gender equality (Agnes, 2011). But, studies in recent years have repeatedly shown that there is a considerable gap between rights and reality. Women's situation with regard to gender based violence, unequal access to resources, wage discrimination and social practices based on patriarchal tradition remains to be the same in various regions and social groups as it was then (Chakravarti 2003). Kabeer (1999) defines empowerment as the capacity to exercise agency and access opportunities as well as having formal rights. Thus, legal protections do not necessarily guarantee substantive equality if there are social and economic barriers.

Education has become one of the most significant forces in social change in India. Women's literacy rates have improved and women now have better access to higher education, which has increased their opportunities for employment and political participation and civic engagement (Government of India, 2021). Education has also helped to raise awareness of legal rights and has helped women to challenge discriminatory practices more effectively. However, there are still regional, class, and community disparities in education. Education, however, does not have the transformative power for all of them such as women from marginalised castes, rural women and economically vulnerable groups (Chakravarti, 2003). So, education is a great tool for empowerment, but it does not work equally throughout society.

Economic participation is another key aspect of gender justice. Many studies indicate that economic independence improves women's bargaining position in the household and provides them greater autonomy and self-determination (Agarwal, 1994). Women have become part of various fields of the economy in India such as education, healthcare, administration, technology and entrepreneurship. Yet, female labour force participation rates are still significantly lower than male rates and gender gaps are persistent (International Labour Organization [ILO], 2018). Women face a further limitation on their economic empowerment due to informal employment, unpaid domestic work and inequities in access to productive resources. The issues raised in these challenges are indicative of the shortcomings of legal equality in the absence of larger structural shifts.

Tensions between legal rights and social realities are echoed in the Iranian experience. Although the law is somewhat different in some aspects of family law, Iranian women have made tremendous strides in education and professionalism. Women are a big part of the university educated population and have steadily moved into fields like medicine, law, engineering and academia (Moghadam, 2003). The educational development has opened opportunities for social mobility and has led to the rise of a highly educated female population, which is able to actively use the forum of public discourse. That is a sign of how much social change can be brought about in a conservative legal climate.

Meanwhile, however, legal restrictions, cultural norms, and institutional obstacles remain a problem for women in Iran. Debates about marriage, divorce, inheritance and guardianship are especially contentious because they continue to influence discussions about gender equality in family law (Mir-Hosseini, 2000). Many Iranian women have learned to deal with these limitations by engaging in "patriarchal bargaining," as Kandiyoti (1988) terms it, by strategically negotiating within the social framework. But, rather than being merely recipients of legal authority, women can be active participants in the process of redefining the scope of legitimate social and political involvement.

In both countries women's activism has been important in the area of gender justice. Feminist movements in India have played a significant role in raising awareness about various issues, including domestic violence, sexual harassment, political representation, reproductive rights, and more. In addition, civil society groups, women's organizations, legal activists and grassroots groups have played an important role in advancing legislative changes and public awareness campaigns (Menon, 2004). In the same way, there has been a variety of expressions of Iranian women's activism for the purpose of seeking more rights and opposing discrimination. These have involved legal advocacy, educational programs, intellectual discussions and advocacy campaigns for legal reform (Moghadam, 2003). The experiences of both countries highlighted that social transformation can also be achieved through collective action from civil society other than through state institutions.

Globalisation and international human rights norms have also contributed to the current debates on gender justice. The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and other international instruments have helped to establish international standards on women's rights and equality (United Nations, 1979). Even if countries deal with these norms in their own ways, international norms have thus far served as useful frames for domestic discussions on gender justice. Scholars believe that globalization has allowed the flow of ideas, provided a boost to transnational feminist networks and made women's rights and awareness more visible across national boundaries (Fraser, 2009). However, there is often a conflict between universal human rights principles and more local cultural and religious traditions.

A comparative study of the experiences of India and Iran shows that achieving gender justice is a process, and not a fixed destination. Although women's rights have been extended under the law in both countries, they are not necessarily enjoyed in practice without other social changes. Although there has been some progress regarding law, gender inequalities in society and norms related to patriarchy are still influencing women's lives. Despite the achievements in the field of law, women continue to experience gender inequalities in society, including through patriarchal norms and institutional barriers. Thus, the impact of the legal tools is contingent upon how they engage with social change to strengthen women's autonomy, agency and participation.

Theories of gender justice are supported by the experiences of India and Iran, which point towards the need for both redistribution and recognition. Social justice means more than merely distributing the resources equitably, it is also about recognizing that each person is an equal participant in society, argues Fraser (2009). If this is applied to the realm of women rights it is clear that there is a need for social acceptance, economic opportunity and political inclusion in order to be able to achieve legal equality. Formal rights, if they exist, may be largely hollow unless they are complemented by these complementary transformations. The efforts towards achieving gender justice in India and Iran serve as a good example of the fact that law plays its most effective role when there is greater societal transformation. While the law is a necessary precondition of equality, it cannot be enough, and education, economic empowerment, political participation and cultural change are crucial. Thus, the process of negotiation between law and society has remained at the heart of the acquisition and ongoing problems of women's rights in modern societies.

Discussion

Comparing the rights of women in India and Iran shows that although there are many differences between them in their political systems, legal tradition and constitution, they still face very similar issues in the struggle for gender justice. The experiences of these societies show that it is not just a legal issue but rather a social, cultural and political process that is connected to a history of inequality, institutional structures and rights and recognition struggles going on. Both states have implemented positive reforms that have sought to elevate women's position, but it is debatable where this has led to substantive equality (Agnes, 2011; Moghadam, 2003). Achievement of gender justice is one of the greatest challenges faced by modern societies. The findings of this study have shown that the process of women's rights is not necessarily linear and straightforward, but rather it is influenced by a variety of factors, including historical traditions, legal frameworks, religious interpretations, political changes, and social shifts. While the difference in constitutional architectures and legal bases is very great between the two countries, both have

had longstanding tensions between traditional social structures and contemporary expectations of equality, inclusion, and human rights.

The historical study presented in this paper suggests that women have held varying roles in different historical periods in both India and Iran. During the early Vedic era, women were involved in educational, religious and intellectual pursuits in India, but their autonomy and public engagement began to wane with the socio-cultural changes that took place over the years (Dwivedi & Malik, 2022; Ayub & Raina, 2018). Likewise, women's role in Iran experienced various historical stages, shaped by political changes, religious organizations, and shifts in the state policies (Afary, 1996). These experiences are a reminder that gender is the result of unfolding historical events and that it is always being re-made by the larger social and political arenas.

The study also shows that legal reform has been a key factor towards the promotion of women's rights in both countries. The Constitution of India has provided for gender justice, and there are laws in place to promote gender justice in the areas of marriage, inheritance, domestic violence, workplace discrimination, and political representation (Agnes, 2011; Government of India, 1950). Similarly, the Iranian legal system has also enshrined women's rights in the constitutional structure of the Islamic republic and has seen significant discussions and changes regarding women's education, employment and family law (Moghadam, 2003). The progress made demonstrates that the law continues to be an important tool for resisting discrimination and promoting opportunities for women.

One of the key conclusions of this work, however, is that legal change cannot ensure 'substantive gender equality'. There is a substantial disparity between legal rights and social fact in both India and Iran. Family relations, economic opportunities, political participation and access to justice remain affected by patriarchal norms. Barriers often faced by women include unequal power dynamics, institutional deficiencies, and cultural norms which restrict the implementation of women's rights in practice (Kandiyoti, 1988; Bhasin, 2006). However, the presence of progressive laws doesn't necessarily imply meaningful social change.

The comparative analysis also underscores the role of education in promoting women empowerment. Educational improvements for women have increased opportunities in both countries for social mobility, job opportunities and political participation. Women's empowerment has been increased through education, which has led to a greater awareness of their rights and has enhanced their capacity to engage in public life (Kabeer, 1999). However, differences in class, region, caste and socio-economic status still impact educational outcomes, and access to education is not equal despite considerable achievements.

The other key take-away is on the importance of women's activism and civil society movements in advancing gender justice. In both India and Iran, the initial steps towards change in the law have often been followed by a concerted campaign by women's groups, intellectuals, legal activists and grassroots groups. These actors have been instrumental in moving beyond discrimination, shaping public debate, and holding institutions accountable (Menon, 2004; Moghadam, 2003). Their action has shown that the implementation of social change is not only a matter of the state, but requires civil society action too.

The study also shows that religion and culture are still important in affecting women's rights. In India, debates about personal laws often echo conflicts between constitutional values of equality and religious values. The debates around gender justice in Iran tend to focus on the interpretation of Islamic law and how

it is related to the modern concepts of women's rights (Mir-Hosseini, 2000). From such experiences it can be seen that religion does not automatically generate a conflict or tension between religion and gender equality nor does it automatically generate harmony and peace. Instead, results are significantly influenced by the meaning, practice and negotiation of religious principles in specific social and political settings.

One of the strengths of this research is that it has shown the importance of the concept of gender justice as a multi-faceted one, including legal, social, economic, political and cultural aspects. The results indicate that Fraser's (2009) contention about the need for both "redistribution" and "recognition" for justice is correct. Empowerment does not just rely on the formal law, but it also relies on the access to resources, opportunity and social recognition of the female as an equal citizen of society. Kabeer (1999) similarly highlights the need for resources and agency, as well as achievements, as keys to empowerment. Such theoretical understandings contribute to the comprehension of why legal changes are not enough to eradicate gender inequalities and why a more comprehensive social change is needed.

The results of this study have several important policy implications. Firstly, governments need to do more to strengthen the implementation of existing legal protections at the institutional, judicial and public awareness levels. Second, there is a need to maintain policies that continue to focus on girls' education and ensure there are no disparities due to region or socio-economic status that affect access to learning opportunities. Third, it is necessary to focus on the economic empowerment programmes in order to improve women's employment in the labour market, the wage gap, and expand the opportunities to access property, credit and entrepreneurship. Fourth, there is a need to strengthen the response to gender-based violence, including by strengthening the legal enforcement of the law, raising awareness and providing support for victims. Last but not least, policy makers need to appreciate the role that religious leaders, community groups and civil society actors can play in fostering gender-inclusive understandings of cultural and religious values.

Comparing and contrasting the experiences of India and Iran in this instance reveals that gender justice is not a place or a thing, but a process of negotiation and change. The two countries have made significant strides in the field of women's rights, both with their laws and their efforts to expand education and social awareness. However, both are still grappling with embedded patriarchy, barriers to women and socio-economic disparities. These challenges persist, indicating that all-encompassing social, cultural and economic development must be coupled with legal reform for meaningful progress.

Finally, the study validates the importance of progress of women's rights in the context of democratic development, social justice and human dignity. The experiences of India and Iran have shown that while laws can offer underlying principles of equality, creating gender justice will require society's willingness to change structures and attitudes that perpetuate inequality. The future of gender justice is far beyond laws; it's also about setting the social conditions that allow women to enjoy all their rights, to play an equal role in public life and to contribute to inclusive, equitable societies.

Conclusion

Among the most important similarities to be drawn between the two countries, India and Iran, is the fact that patriarchal social structures have continued to remain alive in both countries despite the many legal and social changes. In both societies, women have traditionally been placed in a gendered social structure that allocates various roles, responsibilities and

expectations to men and women. Despite constitutional amendments and legal adjustments, patriarchal attitude prevails in the area of family relations, employment opportunities, participation in politics and access to resources (Bhasin, 2006). Legal equality has always been challenged to be able to destroy social norms that are deeply rooted in society and that continue to perpetuate gender hierarchy from generation to generation (Kandiyoti, 1988). Another significant overlap relates to the significance of education in promoting women's empowerment. Over the past few decades, the literacy levels and educational attainment of women has improved substantially in both India and Iran. Women's educational opportunities have made it possible for them to pursue careers in professions, more fully engage in public life, and question discriminatory practices. Studies have found that direct investment in education leads to wider rights awareness, greater economic independence and political participation (Kabeer, 1999). The increasing education of women has become one of the most powerful tools to achieve social change and the empowerment of women in both countries.

Women's movements and civil society activism is also a common denominator between both contexts. The feminist movements, legal groups, scholars, the media and grassroots organizations have contributed significantly to moving gender-related reforms forward. Women's movements in India have been able to impact laws relating to domestic violence, workplace harassment, inheritance rights, and political representation (Menon, 2004). In the same vein, Iranian women have been engaged in certain kinds of activism to improve the availability of education, to seek legal changes, and to defy discriminatory practices in the structures they inhabit (Moghadam, 2003). The experiences show that empowerment in women is not only a state initiative, but can also be achieved through long-term social mobilization. Although the approaches of India and Iran are similar, there are important differences between them in terms of gender justice. The most basic distinction is that their fundamental bases are different. The constitution of India is secular and democratic with a formal commitment to equality before the law, regardless of gender, religion, caste or social background (Government of India, 1950). Personal laws continue to apply when it comes to family matters among various religious communities, but the constitutional equality is the general principle that governs judicial interpretation and legislative changes (Agnes, 2011).

Iranian law, on the other hand, is based on the Islamic Constitution, and is strongly shaped by Islamic jurisprudence. Women's rights are guaranteed in the constitutional framework, and the understanding of these rights is coupled with the Islamic legal system and its interpretation of gender relations (Constitution of the Islamic Republic of Iran, 1979). Therefore, discussions over gender equality in Iran tend to revolve around the application of religious law instead of around secular constitutional concepts. This separation has led to different trajectories in the field of family law, inheritance, and personal status laws (Mir-Hosseini, 2000). Differences also exist concerning the regulation of family relations. India's recent legal changes have increasingly guided towards the improvement of the rights of women in inheritance, divorce and property rights. In the case of daughters' rights to ancestral property, for instance, the Hindu Succession (Amendment) Act 2005 has made a huge improvement (Agarwal, 2018). In Iran, it is still customary to follow the principles of Islamic jurisprudence, which means that there are certain differences between men and women in the field of inheritance and family relations (Mir-Hosseini, 2000). Although there have been some positive changes in the legal status of women, family law is one of the most discussed areas of the law when it comes to gender equality in the Iranian context.

There are also disparities in terms of political representation. To build women's participation in grassroots politics, India has taken affirmative steps to include women in local governance institutions by enacting the 73rd and 74th Constitutional Amendment (Government of India, 1992). While barriers to representation at higher political levels exist, these have provided opportunities for millions of women to participate in political decision making processes. Although women can vote and are allowed to take part in elections in Iran, they are still under-represented in the highest-level political institutions and in the executive branch (Moghadam, 2003). While there are differences, there are common issues and limitations between both countries that stand in the way of achieving substantive gender justice. One of the most persistent barriers is the issue of the legal vs the social. Even as there is formal equality, women in the legal sense, they may face restrictions in receiving and implementing the rights granted to them because of economic dependence, social pressure, information gap, and institutional weaknesses (Agarwal, 1994). Where there is a legal protection in place, it does not necessarily mean that it is being implemented effectively. Gender-based violence is also a significant issue. Research in India, and international human rights reports on Iran, suggest that women are still subject to a range of abuses, including domestic violence, harassment, and structural discrimination (United Nations Women, 2023). This makes it clear that, without change in social attitudes, legal reform is limited. The continued use of violence against women shows that there have to be more than just the law to achieve gender justice.

Women's ability to enjoy their rights is also hampered by economic inequality. The participation rates of women in the labour force, wage equality and access to leadership positions are areas for concern in both countries despite the significant gains in educational achievements (International Labour Organization, 2018). Women are often economically dependent, thus reducing their real ability to make independent choices and the effectiveness of legal rights. Economic empowerment is therefore an important aspect of any gender justice approach. The comparative analysis also shows that women's cultural and religious traditions remain to play significant role in both societies. Traditions can offer sources of identity and social cohesion, but can also be employed as a means to justify unequal gender relations, if interpreted within patriarchy. There is an increasing focus on the importance of separating the religious teachings from the socio-cultural practices that interpret and implement them (Abou El Fadl, 2001). This separation has significance in the debates on women's rights, since it provides the space for action that does not endorse cultural or religious forms. Finally, the Indian and Iranian experiences show that gender justice is a journey and not a destination. There is a lot of progress in both societies, and this is being accomplished by legal reform, educational expansion, political participation and social activism. Meanwhile, enduring issues demonstrate how difficult it is to change entrenched systems of gender inequity. The comparison reveals that a multi-dimensional approach is necessary to ensure significant progress, and that this must include legal protection as well as educational opportunities, economic empowerment, institutional accountability and cultural change. The vision of gender justice can only be realized through such 'integrated' work in a variety of social settings for women.

References

- Abou El Fadl, K. (2001). *Speaking in God's name: Islamic law, authority and women*. Oneworld Publications.
- Afary, J. (1996). *The Iranian constitutional revolution: Grassroots democracy, social democracy, and the origins of feminism*. Columbia University Press.

- Agarwal, B. (1994). *A field of one's own: Gender and land rights in South Asia*. Cambridge University Press.
- Agarwal, B. (2018). Can group farms outperform individual family farms? Empirical insights from India. *World Development*, 108, 57–73. <https://doi.org/10.1016/j.worlddev.2018.03.004>
- Agnes, F. (2011). *Law and gender inequality: The politics of women's rights in India*. Oxford University Press.
- Altekar, A. S. (1956). *The position of women in Hindu civilization: From prehistoric times to the present day*. Motilal Banarsidass.
- Ayub, S. J., & Raina, A. R. (2018). Status of woman in ancient India: A comparative study of North Indian society and Kashmir. *Journal of South Asian Studies*, 6(3), 159–164.
- Bhasin, K. (2006). What is patriarchy? *Women Unlimited*.
- Chakravarti, U. (1993). Conceptualising Brahmanical patriarchy in early India: Gender, caste, class and state. *Economic and Political Weekly*, 28(14), 579–585.
- Chakravarti, U. (2003). *Gendering caste through a feminist lens*. Stree.
- Constitution of the Islamic Republic of Iran. (1979). *Government of Iran*.
- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), 1249 U.N.T.S. 13 (1979).
- Dwivedi, M., & Malik, S. (2022). Status of women in Vedic period. *Journal of Positive School Psychology*, 6(3), 5694–5697.
- Emami, A., & Mirderkvand, A. (2018). Legal status of women in the Sassanid's era (224–651 AD). *Cogent Social Sciences*, 4(1), 1540962. <https://doi.org/10.1080/23311886.2018.1540962>
- Esfandiari, H. (2010). *The women's movement in Iran*. The Iran Primer. United States Institute of Peace.
- Forbes, G. (1996). *Women in modern India*. Cambridge University Press.
- Fraser, N. (2009). *Scales of justice: Reimagining political space in a globalizing world*. Columbia University Press.
- Government of India. (1950). *The Constitution of India*. Government of India Press.
- Government of India. (1955). *The Hindu Marriage Act, 1955*. Government of India.
- Government of India. (1956). *The Hindu Succession Act, 1956*. Government of India.
- Government of India. (1992). *The Constitution (Seventy-Third Amendment) Act, 1992*. Government of India.
- Government of India. (1992). *The Constitution (Seventy-Fourth Amendment) Act, 1992*. Government of India.
- Government of India. (2013). *The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013*. Government of India.
- Government of India. (2021). *Women and men in India 2021*. Ministry of Statistics and Programme Implementation.
- International Labour Organization. (2018). *World employment and social outlook: Trends for women 2018*. International Labour Office.
- Kabeer, N. (1999). Resources, agency and achievements: Reflections on the measurement of women's empowerment. *Development and Change*, 30(3), 435–464. <https://doi.org/10.1111/1467-7660.00125>
- Kandiyoti, D. (1988). Bargaining with patriarchy. *Gender & Society*, 2(3), 274–290. <https://doi.org/10.1177/089124388002003004>
- Kar, M. L. (2012). Women's employment and higher education in Iran. *Middle East Critique*, 21(1), 15–29. <https://doi.org/10.1080/19436149.2012.658667>
- MacKinnon, C. A. (2006). Equality and discrimination under the Indian Constitution. *International Journal of Constitutional Law*, 4(2), 181–202. <https://doi.org/10.1093/icon/mol007>
- Mansour, D. (2014). Women's rights in Islamic Shari'a: Between interpretation, culture and politics. *Muslim World Journal of Human Rights*, 11(1), 1–24. <https://doi.org/10.1515/mwjhr-2012-0006>
- Mayer, A. E. (1999). *Islam and human rights: Tradition and politics* (3rd ed.). Westview Press.
- Menon, N. (2004). *Recovering subversion: Feminist politics beyond the law*. Permanent Black.
- Mir-Hosseini, Z. (2000). *Marriage on trial: Islamic family law in Iran and Morocco*. I.B. Tauris.
- Moghadam, V. M. (1991). The reproduction of gender inequality in the Islamic Republic of Iran: A case study in the 1980s. *World Development*, 19(10), 1335–1349. [https://doi.org/10.1016/0305-750X\(91\)90052-U](https://doi.org/10.1016/0305-750X(91)90052-U)
- Moghadam, V. M. (2003). *Modernizing women: Gender and social change in the Middle East* (2nd ed.). Lynne Rienner Publishers.
- Nussbaum, M. C. (2000). *Women and human development: The capabilities approach*. Cambridge University Press.
- Sanasarian, E. (1982). *The women's rights movement in Iran: Mutiny, appeasement, and repression from 1900 to Khomeini*. Praeger Publishers.
- Sechzer, J. A. (2004). Islam and women: Where tradition meets modernity. *Sex Roles*, 51(5–6), 263–272. <https://doi.org/10.1023/B:SERS.0000046610.16101.8c>
- Sharma, R. S. (2002). *India's ancient past*. Oxford University Press.
- Supreme Court of India. (2017). *Shayara Bano v. Union of India*, (2017) 9 SCC 1.
- Tharu, S., & Lalita, K. (Eds.). (1991). *Women writing in India: 600 B.C. to the early twentieth century* (Vol. 1). Feminist Press.
- United Nations. (1948). *Universal Declaration of Human Rights*. United Nations.
- United Nations Women. (2023). *Progress on the Sustainable Development Goals: The gender snapshot 2023*. UN Women.