

Breaking the Chains of Caste: Honour Killings and the Struggle for Legal Reform in Tamil Nadu

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Abstract- Honour killings, where murders or violent acts are committed due to perceived threats of dishonoring families or communities through intercaste or interfaith relationships, are not considered separate crimes under Indian law. Tamil Nadu faces a tricky situation: it has had many years of anti-tying campaigns and generous help programs, yet recently there have been major honor killings that courts failed to handle properly, and an argument over how many people actually live in the area. This paper uses research questions to examine constitutional and criminal law instruments like IPC/BNS, CrPC, PoA Act. It discusses the binding Shakti Vahini and their application in Tamil Nadu. The paper also looks at landmark cases such as Udumalpet/Shankar and Kannagi-Murugesan, concluding with the 2025 Supreme Court's decision in K. P. Tamilmaran. Comparing official crime statistics from NCRB/MHA with NGO evidence shows significant discrepancies: official "honor killings" tally has consistently underestimated actual incidents in Tamil Nadu compared to reported events.

The study recommends a combined strategy:

- (a) Mandatory tagging of FIRs, establishment of district honour-crime cells, provision of safe houses, and implementation of witness protection measures.
- (b) procedural reforms (audit of pending murder cases, mandatory education of police officers on duties)
- (c) statutory innovation Tamil Nadu statute criminalizing community decrees and assemblies that target adult alliances, with aggravated offences when caste animus is proved)
- (d) Data changes (State dashboard, SP-level checks, yearly classification updates). The paper incorporates recent court decisions, MHA/NCRB reports, NGO summaries, and current media coverage (2023-2025). Courts increasingly acknowledge caste motives and institutional neglect; PoA Act provisions may be crucial if caste bias is established. Official Tamil Nadu records underestimate incidents because of incomplete classifications and registrations, allowing quick improvements through institutionalizing Shakti

Vahini within police procedures and databases.

Key short findings: courts are more willing to recognize caste motive and institutional dereliction; PoA Act overlays can be decisive when caste animus is proved official Tamil Nadu statistics undercount incidents due to classification and registration gaps and immediate remedial gains can be achieved by institutionalizing Shakti Vahini in police routines and data systems.

1. INTRODUCTION & DEFINITIONS

1.1 What is an "honour killing"?

"Honour killing" is a social description (not a separate statutory offence) commonly used for murders motivated by the belief that a family member's behaviour (most typically a marriage or relationship across caste/religion boundaries) has tarnished the community or family honour In Indian law such incidents are charged under IPC/BNS offences like murder (IPC sec 302 / BNS sec103) abetment and conspiracy (IPC sec109 and sec120B) and crucially when caste animus exists aggravated provisions in the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989 (PoA Act). Courts insist "honour killing" means actions motivated by threats, past incidents, and community involvement.

1.2 Why focus on Tamil Nadu?

Tamil Nadu stands out due to ongoing caste conflicts in isolated areas, despite having long-standing efforts against caste discrimination. It has seen several high-profile incidents like those involving Udumalpet and Shankar, which clarified legal standards. Additionally, there's a significant discrepancy between official murder statistics and community monitoring of caste-based offenses. This highlights Tamil Nadu as a crucial location for assessing law enforcement effectiveness and reform initiatives.

2. METHODOLOGY & SOURCES

This paper examines statutes, Supreme Court and Madras High Court judgments, NCRB/MHA motive-of-murder tables, official replies to Parliament, Evidence NGO counts, press reporting, Udumalpet 2016, Kannagi-Murugesan → Madras HC appeal → SC 2025 cases, sources from government PDFs (MHA/NCRB), court judgments, law reporters (LiveLaw/SC Observer/Deccan Herald), Wikipedia pages (background used, cross-verified), and NGO reports. Direct official PDFs or judgments are cited where available (see bibliography).

3. RESEARCH QUESTIONS — STRUCTURE & ANSWERS

The paper was organized by addressing five separate research questions. An analytical response, backed by case law and statutes, supplemented with Tamil Nadu-specific data, and when necessary, incorporated reform recommendations.

RQ1. What laws and rights protect against, examine, and punish honor killings in Tamil Nadu?

Tamil Nadu's current approach to honour killing cases involves combining constitutional safeguards (Article 14, Article 15, Article 19, Article 21) general criminal laws (Indian Penal Code/Code of Criminal Procedure), and procedural measures under the Criminal Procedure Code. When there's an element of caste-based hatred, additional provisions under the Protection of Civil Rights Act also come into play. The Supreme Court's Shakti Vahini from 2018 include specific administrative tasks like safe houses, help lines, and immediate FIR registrations that should direct law enforcement efforts in Tamil Nadu. States can create their own laws for preventing and punishing honor killings. Rajasthan offers an example of how this might be done. No country has a single law specifically against honor killings.

Legal instruments (expanded):

Adults have the constitutional right under Article 21 to choose their own partners. Articles 14 and 15 safeguard against caste and sex discrimination. Articles 19(1)(a) and (d) ensure freedom of expression and association, frequently challenged by familial and community opposition. Courts frequently base their protective measures on Article 21.

Criminal laws cover murder under IPC/BNS section 302, aiding it in IPC sections 107-120, forming a crime together in IPC section 120B and agreeing to commit crimes as in IPC section 34. False claims made by government workers (section 217 of IPC) and tampering with evidence (section 201 of IPC) frequently arise when law enforcement prevents an investigation from proceeding. Courts make officers responsible when they delay filing FIRs or hide them. The Scheduled Castes and Scheduled Tribes Prevention of Atrocities Act, 1989: If someone from an SC/ST community commits a crime motivated by their status, these laws offer specific offenses, expedited processes, and evidentiary presumptions that aid prosecutors. Recent decisions indicate that courts consider POA when racial prejudice is evident. The Supreme Court in 2018 issued for Shakti Vahini: preventive measures include vigilance cells, helplines, and safe houses; remedial actions involve prompt filing of FIRs and protection orders; and departmental accountability requires action when police fail their duties. These directions are binding and should be operationalised by the Tamil Nadu government and police.

Tamil Nadu's practical applications involve immediate legal actions like filing FIRs that show "honor" motives or caste conflicts, charging poachers when necessary, invoking Shakti Vahini duties in cases of public interest or writ petitions to force police action, and pursuing IPC section 217/218 charges against corrupt officials who commit dereliction or cover-up crimes. Protective writ interventions are legal measures. Police commands are enforced through Article 32 provisions.

RQ2 — How have courts in Tamil Nadu and the Supreme Court recently adjudicated honour killing cases — what legal doctrines and evidentiary approaches are emerging?

Recent court decisions indicate that they now consider caste and exogamy motives crucial in offenses, are prepared to prosecute organizers and conspirators if their actions can be proven through circumstantial evidence backed by forensic

and digital records, and are becoming more likely to hold government officials responsible for delays in registrations and cover-ups. Survival stories, digital logs, and public discussions all help determine why things happened.

Key Tamil Nadu cases summarized (expanded):

1. Udumalpet / Shankar (2016) — trial and appeals
Sankar and his wife, Kausalya, were killed by attackers who attacked them in public on March 13, 2016. The trial court initially handed death sentences to some accused, citing honour killing motive; later appeals saw some convictions modified and death sentences commuted to life terms. CCTV footage, witness accounts, CD records, and statements were evidence. Survivor stories showed how evidence linked crimes together.

2. Kannagi–Murugesan (Cuddalore, 2003) → Madras HC appeals → Supreme Court (2025: K.P. Tamilmaran v. State). Kannagi-Murugesan from Cuddalore in 2003 appealed to the Madras High Court, which then took up the case before the Supreme Court in 2025, where it was decided by K. P. Tamilmaran against the state. Facts & procedural history: The 2003 double murder of Kannagi and Murugesan (inter-caste marriage) led to trials, a Madras High Court decision, and a Supreme Court appeal culminating in the SC's 2025 decision that: (a) affirmed life sentences for principal accused; (b) considered and upheld parts of PoA Act-bases charges; (c) found police dereliction — convicting or faulting public servants for cover-ups (IPC sec217/218). The SC gave money and said bad things about violence linked to castes. The court shows it's open to considering caste motives and punishing institutions that fail.

3. Other recent cases from 2024-2025 involved multiple reported incidents and NGO compilations like "Evidence" that documented numerous caste killings in Tamil Nadu starting from 2017. Courts sometimes transferred investigations to CB-CID/CBI or ordered protective measures through Shakti Vahini protocols. These incidents show that there's something wrong in how things work together, not just bad actions by people alone.

Evidentiary trends & doctrinal points:

- Where there's no direct confession, courts now often look at clues like past threats, public gatherings, easy access to weapons, and missing evidence to guess about a secret plan and why someone might want it hidden.
- CCTV footage and mobile call records are crucial; courts require proper 65B certification and custody documentation.

- Courts will punish police neglect; Tamilmaran demonstrates conviction or disapproval of police for failing to file FIRs promptly or hindering evidence collection.
- PoA Act provisions enhance prosecution cases when victims are SC/ST; courts consider caste bias as a severe offense.

RQ3 — What are the statistical patterns for honour killings in Tamil Nadu: official figures of (NCRB / MHA) vs civil-society compilations? Why the divergence?

Short answer (thesis): Official "honour killing" numbers reported to Parliament and in the NCRB often show low or zero counts for certain years, while civil-society groups and media reports show many more incidents.

The difference is mainly because of how cases are classified. FIRs and murder cases are often filed under general murder categories without stating the motive as "honour" or "inter-caste." Plus, there's a delay in reclassifying cases, incomplete data entry, and police reluctance to record caste-related motives. All these things lead to significant underreporting.

Official data (examples):

The Ministry of Home Affairs responded to a Rajya Sabha question on April 5, 2023, showing how states report murder motives.

Tamil Nadu's reported numbers in some annexures didn't match the number of documented incidents—sometimes showing zero or fewer "honour killings" even though well-known cases existed. The NCRB's Crime in India (2022) gives overall murder statistics and motive categories, but not all states consistently report "honourkilling" as a separate motive.

Civil-society counts:

NGOs like Evidence (Madurai) have publicly shared numbers, such as at least 65 caste-related killings in Tamil Nadu since 2017, as reported in July 2025.

These figures come from press reports, police FIRs, and local monitoring. Press coverage, like the Kavin murder case in July 2025, and investigative reporting also contribute to the documented cases.

Why do official stats undercount? (Detailed factors)

1. Motive-tagging at the FIR stage is weak: Police often record deaths under general murder categories and

don't include a motive field or use unclear labels, so "honour" isn't flagged as a motive.

2. Delayed classification: Even if the motive becomes clear later during the investigation or trial, some states don't go back and reclassify cases in the NCRB reports.

3. Political sensitivities and local pressure: In areas where dominant groups are politically powerful, there may be resistance to labeling a killing as an "honour crime."

4. Narrow PoA applicability: The PoA Act only covers cases where the victim is an SC/ST; inter-caste killings not fitting this definition might not get the PoA label and are recorded differently.

5. Data systems and training: Poorly trained police staff in data entry lead to under-coding of cases.

Implications: Underreporting hides the real extent of the issue and weakens efforts to reform the system.

Tamil Nadu should require motive-tagging in every murder FIR and conduct regular reviews to match investigative findings with NCRB data.

RQ4 — What are the systemic issues that prevent accountability in Tamil Nadu, particularly regarding the police, prosecution, evidence collection, and social factors?

Short answer (thesis): The main challenges are:

- (1) the police delaying or refusing to register FIRs;
- (2) witnesses being threatened and the lack of proper witness protection or safe houses;
- (3) poor follow-up on forensic investigations and delayed forensic science laboratory reports
- (4) social pressures and local power structures that discourage people from reporting and damage evidence
- (5) low conviction rates in cases of public order acts and related offenses due to weak procedures and investigations.

Detailed breakdown of the problems with examples:

Police inaction and cover-ups: Many cases show that FIRs are filed late or the motive is changed.

In the case of K.P. Tamilmaran (SC, 2025), the police were found to be negligent and some officials were punished. Reports from the media and NGOs, such as in the Kavin murder case in July 2025, highlight that the police are still not responding adequately.

Witness intimidation and lack of protection: Shakti

Vahini has called for safe houses and helplines because survivors and witnesses face real danger.

The lack of safe houses and police presence at these places makes it hard for witnesses to cooperate. NGOs are pushing for standard operating procedures for witness protection that are specifically designed for PoA Special Courts.

Weaknesses in forensic and digital evidence: Evidence from CDRs and CCTV is crucial when it is properly preserved, but if the chain of custody is broken or post-mortems are delayed, the evidence can be lost or not be trusted. The Udumalpet (Shankar) case shows how fast forensic work and CCTV footage can help in getting a conviction, but other cases fail because the evidence is not properly preserved.

Delays in prosecution and trials: Long waiting times make it hard for witnesses to come forward and remember details.

Special courts for PoA cases are not well-equipped. Reports from NGOs show that many cases under the PoA Act are stuck in Tamil Nadu districts like Madurai.

Policy impact: Without major reforms in administrative and procedural systems — including mandatory tagging of FIR motives, setting up district-level honor crime cells, and enforceable witness protection measures — convictions will keep being inconsistent.

RQ5 — What legal, procedural, and policy changes should Tamil Nadu make right now?

Short answer (thesis): A three-part plan: (A) Setting up Shakti Vahini, including safe houses, helplines, and district cells; (B) Legal and statutory changes, like requiring motive tags in murder reports, reviewing the PoA Act, and creating a specific "honour crimes" law for Tamil Nadu to punish community decisions and gatherings that encourage

violence; (C) Improving data and accountability by aligning with NCRB, conducting SP-level reviews, and ensuring timely updates.

Detailed reforms:

1. Motive tagging must be mandatory in FIRs; update TN Police rules so all murder reports include a "suspected motive" field with categories such as caste-based, religious, dowry, property disputes. A police

chief should examine these matters in seven days. Improper tagging can result in internal penalties.

2. Each district must form a police-led team, combining Social Welfare, Adi Dravidar & Tribal Welfare, prosecution, and civil society organizations. This team will be headed by a Deputy Superintendent of Police. Cells manage risks, create safety strategies, and direct investigations.

3. Safe Houses and 24/7 Helplines: Create safe houses in every district headquarters, with police guards and relocation help. Promote helplines extensively.

4. Witness protection rules and relocation grants connect to the PoA special court schedule. Video calls, screens, and moving around as required.

5. Set up an immediate post-mortem team; take video footage of crime scenes; secure devices. Use legal deadlines for speeding up forensic reports whenever feasible.

6. Every quarter, release a public report correlating FIRs with NCRB data. Develop an approach for modifying case classifications when additional reasons emerge in the future.

7. Tamil Nadu should pass an act making it illegal to organize illegal groups, force marriage stops, socially isolate those causing harm, impose harsher punishments for caste hatred, and reverse the legal burden when families are directly involved. Rajasthan's 2019 law could be an example.

Form a committee of state-level officials under the Chief Secretary's leadership to manage Shakti Vahini's expansion. This group must share their work annually. All officers in charge of justice must attend classes at both the Tamil Nadu State Judicial Academy and Police Academy.

4. DETAILED CASE NOTES (SELECTED, WITH ANALYSIS)

Udumalaipettai Case / Shankar (2016–2020) — Case Summary & Legal Insights

Facts: On March 13, 2016, Sankar Velusamy, a Dalit man, was killed and his wife, Kausalya, an engineer from the Thevar community, was severely attacked after they got married across castes.

The attack happened in broad daylight near the Udumalaipettai bus stand. Sankar died immediately, while Kausalya survived.

Procedural History: The trial court convicted several accused and imposed death sentences.

However, the Madras High Court in 2020 reviewed the case and adjusted the sentences, acquitting some accused due to insufficient evidence. The evidence included CCTV footage, witness statements from the survivor, and a CDR (criminal record) report.

Legal Lessons: (i) Survivor testimony is a strong piece of evidence but can be easily influenced, so witness protection is crucial; (ii) Forensic evidence and digital records like CCTV and CDR play a key role in securing convictions; (iii) Social and political pressures can impact the investigation process.

Kannagi–Murugesan Case → K.P. Tamilmaran v. State (SC, April 28, 2025) — Key Implications

Facts: In 2003, a double murder occurred in Cuddalore, linked to an inter-caste marriage between a Vanniyar woman named Kannagi and a Dalit man named Murugesan.

Judicial Process: Initial trial convictions led to death sentences.

The Madras High Court in 2022 revised these sentences, including some commutations. The Supreme Court later reviewed the case in 2025, upholding life sentences and addressing police negligence. The court held officials accountable under IPC sections 217/218 and provisions of the Police Act. The Supreme Court also provided compensation to the victims' families.

Significance: The 2025 decision acknowledged caste-based violence as a systemic issue and emphasized the state's duty to protect victims and register FIRs promptly.

It marked a significant legal development and aligned with the operational goals of Shakti Vahini.

Recent Press-Reported Incidents (2024–2025) — Systemic Trends

In July 2025, Kavin, a Dalit youth from Tirunelveli, was killed.

NGOs and the media reported the incident, and a call for a CBI investigation emerged. Local authorities were criticized for not taking adequate action or offering protection. NGOs highlighted 65 caste-related killings in Tamil Nadu since 2017. These patterns show that the issue remains widespread.

The Gokulraj Case (2015): A Turning Point in Honour Killing Laws in Tamil Nadu

The case involved the murder of a 21-year-old Dalit engineering student in Namakkal district after he was spotted with an upper-caste woman.

The crime was carried out by members of a caste-based group led by Yuvaraj. In 2022, a CBI court convicted Yuvaraj and others under IPC sections 302, 364, 201, and 120B. Tamil Nadu does not have a specific law against honour killings.

The case highlighted the connection between caste pride and so-called 'honour' crimes.

It also revealed legal loopholes in addressing such offenses. Between 2014 and 2020, around 80–100 cases involving Dalit men in inter-caste relationships were reported in Tamil Nadu.

The ruling was significant as the court condemned the "barbaric mindset" behind such crimes and reaffirmed the constitutional right to choose one's partner.

The case marked a turning point, promoting the implementation of the Shakti Vahini v. Union of India (2018) guidelines and calling for stronger state laws.

5. EMPIRICS & STATISTICS — TAMIL NADU DATA REVIEW (2017–2025)

Key official sources consulted:

- NCRB Crime in India 2022 (booklet/pdf) — baseline murder data by motive and State.
- Ministry of Home Affairs reply to Rajya Sabha (April 5, 2023) summarizing murder motives (2017–2021) This file includes state-level figures used for analysis.

Civil-society sources:

Evidence NGO (Madurai) compilations and statements reported in press (2024–2025) estimating at least 65 caste- killing incidents since 2017.

Summarized tabular snapshot (selected figures)

(1) Official (NCRB/MHA): Tamil Nadu murder totals (selected years) — for instance, total murder counts around 1500–1700 per year in late 2010s–early 2020s; motive-coded "honour" figures often appear very low or not clearly reported for specific years in the annexures, indicating reporting gaps.

(2) Civil-society counts: Evidence NGO public statement (July 2025) cites at least 65 caste killings in TN since 2017 — this figure tracks press-reported, litigation-involved, and NGO-verified incidents, and deliberately aims to count caste- motivated incidents

even when recorded as generic murders.

Interpretation: While official murder numbers remain high for Tamil Nadu, the specific identification of murder motive as "honour" is underreported.

The NGO figure (~65 since 2017) is plausibly consistent with media reporting; the mismatch with official motive-coded numbers points to a problem of classification rather than no incidence.

6. RECOMMENDED DRAFT MODEL: KEY CLAUSES FOR A TAMIL NADU "PREVENTION OF HONOUR CRIMES"

1. Definition: The term "honour crime" refers to actions or failure to act that are intended to punish, scare, or harm someone because of their marriage, relationship, or because they are thought to have broken community or family rules about caste, religion, or sexuality.

2. Offences: Make it illegal to (a) plan or take part in illegal community meetings that order punishment; (b) help or plan violent acts in the name of honour; (c) use social exclusion or forced isolation to control someone's marriage decision; (d) apply harsher penalties when the Public Order Act is involved.

3. Procedural features: At the time of filing a police report, the reason behind the crime must be clearly stated. The police station officer must check and confirm this reason. Also, there should be support for protecting and moving witnesses if needed.

4. Special courts and timelines: Set up fast-track court sessions for these cases and give priority to forensic tests.

5. Victim compensation and rehabilitation: Create a government program to provide financial help and support for housing and jobs to couples who are threatened.

6. Institutional oversight: Establish a State Vigilance and Monitoring Committee that reports every three months

7. CONCLUSION

Tamil Nadu's experience with honor killings highlights how deep social traditions can be and how effectively the government enforces the law. Laws such as the IPC, BNS, PoA Act, and CrPC are strong and can punish murder and conspiracy, but the real issue lies in how these laws are applied in real life. This

involves getting a police report quickly, understanding the motive, protecting witnesses, and keeping evidence safe. Recent court decisions, especially the Supreme Court's 2025 Tamilmaran ruling, show that the judiciary is taking caste-based murders seriously and is ready to hold public officials accountable. For Tamil Nadu, important steps include improving the Shakti Vahini program, enhancing data classification, and considering new laws to stop community decisions that target relationships between adults from different backgrounds. Alongside these legal measures, social programs that support relationships across castes and welfare support for couples from different backgrounds can help reduce honor-based violence in a real and practical way.

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- [3] K.P. Tamilmaran v. State, Supreme Court of India (Apr. 28, 2025) (judgment pdfs and reporting).
- [4] Udumalpet / Shankar murder case (trial 2017; Madras HC appeal 2020 — media and case reports).

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