

Ageing, Rights, and Social Justice: A Socio-Legal Study with Special Reference to Madhya Pradesh

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Abstract

Ageing is increasingly recognised as an important social-justice and human-rights issue in India. Changes in family structures, migration, urbanisation, economic dependency, declining inter-generational support, and increasing life expectancy have created new challenges for the protection of older persons. The legal framework governing senior citizens in India has consequently developed beyond traditional notions of family responsibility to include enforceable statutory rights relating to maintenance, healthcare, property protection, and institutional support. The Maintenance and Welfare of Parents and Senior Citizens Act, 2007 represents the principal legislative intervention in this area. This study examines ageing from a socio-legal perspective, with particular reference to Madhya Pradesh. It analyses the relationship between constitutional principles, statutory protections, judicial interpretation, and State-level social-security mechanisms. The study adopts a qualitative doctrinal methodology based on analysis of legislation, judicial decisions, government policies, and official institutional sources. Particular attention is given to maintenance rights, Maintenance Tribunals, protection of property, abandonment, access to justice, and social-security pensions. The analysis finds that the statutory framework has significantly strengthened the formal recognition of senior-citizen rights; however, legal protection remains dependent upon effective institutional implementation and accessibility. Recent judicial decisions have reinforced the beneficial and remedial character of the Senior Citizens Act while also emphasising the need to balance senior-citizen protection with competing rights under other welfare legislation. Madhya Pradesh has established a State-level framework through the 2009 Rules and social-security pension programmes, but challenges remain concerning awareness, accessibility, economic dependency, family-based vulnerability, and effective implementation. The study concludes that social justice for older persons requires a coordinated approach combining legal protection, economic security, accessible remedies, healthcare, and institutional accountability.

Keywords

Ageing; Senior Citizens; Social Justice; Human Rights; Madhya Pradesh; Maintenance and Welfare of Parents and Senior Citizens Act, 2007; Elder Rights; Social Security; Access to Justice; Maintenance Tribunals

1. INTRODUCTION

Ageing is a significant social transformation rather than merely a biological process. The increasing number of older persons has implications for family structures, healthcare systems, social-security programmes, housing, property relations, employment, and access to justice. In India, these issues are particularly important because responsibility for the care of older persons has historically been associated with the family. However, social and economic changes have increasingly complicated the traditional family-based model of support.

Urbanisation, migration, changing household structures, increased participation in formal and informal employment, declining household size, and geographical separation between parents and adult children can affect the availability of family support. These developments do not necessarily eliminate family responsibility, but they demonstrate why family responsibility alone may not provide sufficient protection for every older person.

The legal response to ageing in India has therefore developed through a combination of constitutional principles, legislation, judicial decisions, welfare programmes, and administrative institutions.

The Constitution of India provides the broader normative foundation for this framework. Article 14 guarantees equality before law and equal protection of laws, while Article 21 has been interpreted to protect life and dignity.

Article 41 specifically directs the State, within the limits of its economic capacity and development, to make effective provision for public assistance in cases including old age. These provisions establish an important constitutional basis for considering the welfare and dignity of older persons as part of India's broader commitment to social justice.

The enactment of the **Maintenance and Welfare of Parents and Senior Citizens Act, 2007** was a major development in this field. The long title of the legislation expressly states that it seeks to provide more effective provisions for the maintenance and welfare of parents and senior citizens guaranteed and recognised under the Constitution. ([India Code](#))

The Act establishes a statutory framework for maintenance of parents and senior citizens and provides mechanisms for adjudication through Maintenance Tribunals. It also contains provisions relating to appeals, legal representation, medical support, old-age homes, public awareness, protection of life and property, transfer of property in specified circumstances, and abandonment. ([India Code](#))

The legislation is therefore wider than a simple maintenance law. It represents an attempt to address multiple forms of vulnerability associated with old age.

A significant feature of the Act is that it converts an aspect of traditional family responsibility into an enforceable legal obligation. Under Section 4, a senior citizen or parent who is unable to maintain himself or herself from own earnings or property may seek maintenance from children or, in appropriate circumstances, specified relatives. The statutory obligation is intended to enable the senior citizen to lead a normal life. ([Indian Kanoon](#))

This legal framework becomes particularly important where older persons are economically dependent on family members. Economic dependency can affect bargaining power within the household and may increase vulnerability to neglect, exploitation, or abuse.

Property is another important dimension. Older persons may transfer residential or other property to children or relatives in the expectation of receiving care and support. When that expectation is not fulfilled, disputes can arise concerning maintenance, possession, residence, and property rights. Section 23 of the Senior Citizens Act provides a specific statutory mechanism concerning certain transfers of property made subject to the expectation of care. ([India Code](#))

However, the application of these provisions raises complex socio-legal questions. An older person's legal right may conflict with other legitimate rights within the family. For example, a property dispute involving a senior citizen may also involve the residence rights of another vulnerable family member. Consequently, courts have emphasised that senior-citizen protection must be harmonised with other protective legislation rather than applied mechanically.

The Supreme Court's decision in *S. Vanitha v. Deputy Commissioner, Bengaluru Urban District* is particularly significant in this regard. The Court recognised the protective purpose of the Senior Citizens Act but also considered the rights available under the Protection of Women from Domestic Violence Act, 2005. The judgment demonstrates that social justice requires reconciliation between competing vulnerable interests.

More recently, the Supreme Court in *Urmila Dixit v. Sunil Sharan Dixit* emphasised that the Senior Citizens Act is beneficial legislation intended to secure the rights of senior citizens and that its provisions should be interpreted in a manner that advances the remedies provided by the legislation. ([Indian Kanoon](#))

The judicial development of senior-citizen law therefore demonstrates a movement towards a rights-oriented interpretation.

Madhya Pradesh provides an important context for examining these issues. The State has adopted the **Madhya Pradesh Maintenance and Welfare of Parents and Senior Citizens Rules, 2009** under the central legislation.

The Rules provide for the institutional implementation of the Act within the State, including Maintenance Tribunals. (Indian Kanoon)

The State also operates social-security programmes for vulnerable populations. The Madhya Pradesh Department of Social Justice and Disabled Persons Welfare identifies the **Samagra Social Security Pension Scheme** and **Indira Gandhi National Old Age Pension Scheme** among its social-assistance programmes. (Social Justice Department)

The State's social-security pension scheme provides assistance to persons aged 60 years and above who are unable to maintain themselves, demonstrating that economic support for older persons forms part of the State's broader social-security framework. (Social Justice Department)

The present study examines whether this combination of legal and welfare mechanisms is capable of advancing substantive social justice for older persons.

The central research question is:

To what extent does the Indian and Madhya Pradesh socio-legal framework protect the rights, dignity, economic security, and access to justice of senior citizens?

The study focuses on four interconnected issues: maintenance, property protection, access to institutional remedies, and social security.

Rather than treating ageing as solely a welfare concern, the paper argues that older persons should be understood as rights-bearing citizens whose dignity and autonomy require legal and institutional protection.

2. LITERATURE REVIEW

Research on ageing in India has developed across demographic, sociological, economic, medical, and legal disciplines. The literature demonstrates that ageing is influenced by family structures, economic conditions, health status, gender, social participation, and institutional support. However, the relationship between these social conditions and enforceable legal rights remains an important area of socio-legal inquiry.

2.1 Ageing and Changing Family Structures

The Indian family has historically served as the principal source of support for older persons. Traditional joint-family structures often provided mechanisms for inter-generational care. However, demographic and socioeconomic changes have altered the nature of family support.

Migration for employment and education can separate older parents from adult children. Smaller households and changing family expectations may also reduce the availability of informal care.

The decline of traditional support structures was one of the social concerns underlying the enactment of the Maintenance and Welfare of Parents and Senior Citizens Act, 2007. The legislation seeks to create a formal legal mechanism where family support becomes inadequate.

This development is significant because it represents a movement from purely moral expectations towards legally enforceable responsibilities.

2.2 Ageing and Social Justice

Social justice involves more than the distribution of economic resources. It also concerns dignity, equality, participation, recognition, and access to institutional remedies.

Older persons may experience disadvantage because of age, but age-based vulnerability frequently intersects with poverty, gender, disability, widowhood, rural residence, and lack of independent income.

A social-justice approach therefore requires examination of the conditions under which older persons can actually exercise their rights.

Formal recognition of a right is insufficient if the person cannot access the institution responsible for enforcing it.

2.3 Rights-Based Approach to Senior Citizens

A rights-based approach differs from a purely welfare-based model.

A welfare model generally views older persons as beneficiaries of State assistance.

A rights-based model recognises them as individuals possessing enforceable claims against both public institutions and, in specified circumstances, private actors.

The Senior Citizens Act reflects elements of both approaches. Its maintenance provisions create enforceable obligations within families, while its institutional provisions require State authorities to establish mechanisms for protection and welfare.

This combination makes the legislation particularly suitable for socio-legal analysis.

2.4 Maintenance Rights

Maintenance is one of the most important dimensions of senior-citizen protection.

Section 4 of the Act provides that a senior citizen who cannot maintain himself or herself from own earnings or property may seek maintenance. The obligation extends to the needs necessary for the senior citizen to lead a normal life. (Indian Kanoon)

This provision is important because it recognises that economic dependency can threaten dignity.

Maintenance is therefore not simply an economic transfer. It can determine access to food, residence, healthcare, and basic living conditions.

The Supreme Court has reiterated the protective purpose of the maintenance provisions and the role of Maintenance Tribunals in providing remedies to senior citizens. (Sci API)

2.5 Property Rights and Elder Vulnerability

Property represents an important source of security during old age.

For many older persons, the family home may constitute their principal economic asset. Transfers of property to children or relatives may be undertaken with the expectation of care.

Section 23 of the Senior Citizens Act provides protection in specified circumstances where property has been transferred subject to the expectation that the transferee will provide basic physical needs and amenities to the senior citizen. (India Code)

Judicial interpretation has increasingly examined the relationship between property protection and maintenance.

Recent case law indicates that a maintenance claim and a property-transfer remedy under Section 23 are legally related but should not automatically be treated as identical requirements. (Indian Kanoon)

This distinction is important because senior citizens may require protection even where a conventional maintenance proceeding has not previously been initiated.

2.6 Elder Abuse and Abandonment

Elder abuse represents another important area of concern.

Abuse can include physical violence, psychological intimidation, financial exploitation, neglect, and abandonment.

The Senior Citizens Act specifically addresses exposure and abandonment of senior citizens and establishes related legal consequences. ([India Code](#))

However, legal protection against abuse may be difficult to access because the alleged perpetrator may be a child or close relative.

This creates a significant socio-legal dilemma.

The older person may possess a legal right but simultaneously depend upon the person responsible for providing accommodation, food, healthcare, or emotional support.

Therefore, effective protection requires alternatives to family dependency.

2.7 Gender and Ageing

Ageing is not experienced equally by men and women.

Older women may experience cumulative disadvantages resulting from unequal access to employment, income, property, education, and healthcare throughout their lives.

Widowhood can further increase economic dependence.

Consequently, senior-citizen policy should incorporate gender-sensitive analysis.

The legal framework must also be applied consistently with other protective legislation. The Supreme Court's reasoning in *S. Vanitha* demonstrates why senior-citizen law cannot be applied without considering competing rights within the household.

2.8 Social Security and Economic Independence

Social-security mechanisms can reduce dependence on family members.

Madhya Pradesh currently identifies multiple social-assistance schemes, including the Samagra Social Security Pension Scheme and Indira Gandhi National Old Age Pension Scheme. ([Social Justice Department](#))

The State's social-security pension programme includes older persons aged 60 years and above who are unable to maintain themselves. ([Social Justice Department](#))

Such programmes are important because legal rights relating to maintenance may not be sufficient where family support is absent or unreliable.

Social security therefore functions as a complementary mechanism to family-based maintenance.

2.9 Access to Justice

The effectiveness of senior-citizen legislation ultimately depends upon access to justice.

The Act establishes Maintenance Tribunals and appellate mechanisms. The Madhya Pradesh Rules provide the State-level institutional framework for implementation. ([Indian Kanoon](#))

Nevertheless, formal institutional availability does not necessarily ensure effective accessibility.

Older persons may encounter:

- lack of legal awareness;
- financial limitations;
- mobility constraints;
- dependence upon family members;
- procedural difficulties;
- geographical barriers; and
- fear of damaging family relationships.

Therefore, accessibility must be considered as an essential component of senior-citizen rights.

2.10 Research Gap

The existing literature establishes the importance of ageing, social security, family support, and legal protection. However, a significant gap remains between legal analysis and the social realities surrounding implementation.

There is a particular need for research that integrates:

legal rights + family responsibility + economic security + property protection + institutional access.

This study attempts to address that gap through a focused socio-legal examination of the national legal framework and its application within Madhya Pradesh.

3. METHODOLOGY

The study adopts a **qualitative doctrinal socio-legal methodology**.

The research is based primarily on secondary sources, including:

1. legislation;
2. constitutional provisions;
3. judicial decisions;
4. Madhya Pradesh rules and government materials;
5. official social-security information;
6. academic literature; and
7. relevant policy documents.

The principal legislation examined is the **Maintenance and Welfare of Parents and Senior Citizens Act, 2007**. The Act's relevant provisions include maintenance, Maintenance Tribunals, appeals, legal representation, medical support, awareness, protection of life and property, transfer of property, and abandonment. ([India Code](#))

The study also examines the **Madhya Pradesh Maintenance and Welfare of Parents and Senior Citizens Rules, 2009**, which provide the State-level implementation framework. ([Indian Kanoon](#))

Judicial decisions are analysed to understand how courts have interpreted the purpose and scope of senior-citizen protection. Particular attention is given to *S. Vanitha v. Deputy Commissioner, Bengaluru Urban District, Urmila Dixit v. Sunil Sharan Dixit*, and recent judicial interpretation concerning maintenance and property protection.

The Madhya Pradesh component is analysed using official material from the State's Social Justice and Disabled Persons Welfare Department, particularly its social-assistance and social-security pension programmes. ([Social Justice Department](#))

The research follows a thematic analytical framework based on four dimensions:

- **economic security;**
- **maintenance and family responsibility;**
- **property and protection against exploitation; and**
- **access to justice and institutional remedies.**

The methodology is doctrinal and interpretive. No primary survey or fabricated statistical data are used. Consequently, the findings represent legal and institutional findings rather than estimates of the prevalence of elder abuse or pension exclusion.

4. RESULTS

4.1 Statutory Protection Has Expanded the Rights of Older Persons

The first major finding is that the legal framework has moved significantly beyond a purely welfare-oriented understanding of ageing.

The Senior Citizens Act creates enforceable mechanisms for maintenance and establishes institutional structures through which senior citizens may seek relief.

The Act specifically provides for Maintenance Tribunals and appellate authorities, thereby creating a specialised mechanism for addressing maintenance disputes. ([India Code](#))

The statutory structure therefore recognises older persons as rights-holders capable of seeking legal remedies.

4.2 Maintenance Is a Legal Obligation, Not Merely a Moral Expectation

The second finding is that the legislation converts family responsibility into a statutory obligation in defined circumstances.

Section 4 establishes the entitlement of qualifying senior citizens and parents to seek maintenance from children or specified relatives. The objective is to ensure that the senior citizen can lead a normal life. ([Indian Kanoon](#))

This is an important development in Indian family law because the State does not simply rely upon moral expectations of filial responsibility.

Instead, the legislation provides a legal mechanism through which the obligation can be enforced.

The Supreme Court has recognised the social character of this responsibility and has emphasised that maintenance of parents is a social obligation of both sons and daughters where parents are unable to maintain themselves. ([Indian Kanoon](#))

4.3 The Law Recognises Property-Based Vulnerability

The third finding is that property protection constitutes a significant component of senior-citizen law.

Section 23 addresses transfers of property in specified circumstances where the transferee fails to provide basic physical needs and amenities to the senior citizen. ([India Code](#))

This provision is significant because it recognises a recurring vulnerability associated with old age: the possibility that an older person may surrender economic control over property in expectation of future care.

Judicial decisions have further developed the relationship between maintenance and property remedies.

Recent decisions indicate that a claim under Section 23 should not automatically be treated as dependent upon a prior maintenance application. ([Indian Kanoon](#))

This interpretation strengthens the protective character of the legislation.

4.4 Madhya Pradesh Has a Formal Institutional Framework

The fourth finding is that Madhya Pradesh has established a formal framework for implementing senior-citizen legislation.

The Madhya Pradesh Rules were made in 2009 under the central legislation. The State framework includes Maintenance Tribunals for adjudicating maintenance matters. ([Indian Kanoon](#))

This demonstrates that the legal framework is not confined to central legislation but is supported by State-level institutional mechanisms.

The presence of such institutions is an essential condition for the implementation of statutory rights.

4.5 Social Security Complements Family-Based Maintenance

The fifth finding is that Madhya Pradesh's social-security system complements the family-maintenance framework.

The State's Department of Social Justice and Disabled Persons Welfare identifies social-security pension programmes, including the Samagra Social Security Pension Scheme and Indira Gandhi National Old Age Pension Scheme. ([Social Justice Department](#))

The State's social-security pension programme specifically includes persons aged 60 years and above who are unable to maintain themselves. ([Social Justice Department](#))

This demonstrates the coexistence of two mechanisms:

family-based legal responsibility + State-supported social security.

The two should not be understood as alternatives. Social security can reduce the intensity of family dependency, while maintenance law provides protection where family support becomes inadequate.

4.6 Access to Justice Remains Central

The sixth finding is that formal legal protection does not automatically result in substantive protection.

An older person may possess a legal right but face practical barriers to exercising it.

This is particularly important where the respondent is a child or relative.

Legal proceedings may create emotional and social costs that discourage older persons from pursuing their claims.

The effectiveness of the law therefore depends upon accessible procedures, legal awareness, institutional responsiveness, and social support.

4.7 Judicial Interpretation Has Strengthened the Beneficial Character of the Act

The seventh finding concerns the role of judicial interpretation.

In *Urmila Dixit v. Sunil Sharan Dixit*, the Supreme Court described the Senior Citizens Act as beneficial legislation intended to secure the rights of senior citizens and emphasised that interpretation should advance the remedies provided by the Act. (Indian Kanoon)

This approach is significant because it moves statutory interpretation towards the protection of substantive rights.

At the same time, courts have recognised that senior-citizen protection must be reconciled with other legal rights.

The judicial approach therefore reflects two principles:

protection of senior citizens + balancing of competing rights.

4.8 The Senior Citizens Act Is Not an Isolated Welfare Law

The final finding is that senior-citizen legislation operates at the intersection of several branches of law.

It involves:

- family law;
- property law;
- constitutional law;
- social-security law;
- administrative law;
- criminal law; and
- human-rights principles.

This explains why ageing requires a socio-legal rather than purely doctrinal approach.

The effectiveness of senior-citizen protection depends upon interaction between legal institutions and social conditions.

5. CONCLUSION

Ageing in India has increasingly become a question of rights, dignity, economic security, and social justice. The legal framework has evolved significantly from reliance upon informal family responsibility towards recognition of enforceable statutory rights.

The **Maintenance and Welfare of Parents and Senior Citizens Act, 2007** represents the central legal instrument in this transformation. It provides mechanisms for maintenance, Maintenance Tribunals, appeals, legal representation, medical support, protection of life and property, and action against abandonment. (India Code)

The legislation is particularly important because it recognises that older persons may become vulnerable when family support is inadequate.

The analysis demonstrates that maintenance is not simply a financial obligation. It is connected to the ability of an older person to maintain a dignified and normal life.

Property protection is similarly significant. For many senior citizens, property constitutes their primary source of economic security. The statutory provisions concerning property transfers recognise the possibility that property may be transferred in expectation of care and that failure to provide such care can create serious vulnerability.

Judicial decisions have strengthened this protective framework. The Supreme Court has recognised the beneficial nature of the Senior Citizens Act and has directed interpretation towards advancing the remedies available to senior citizens. ([Indian Kanoon](#))

At the same time, judicial developments demonstrate that protection of senior citizens must be balanced with competing rights. The decision in *S. Vanitha* illustrates the importance of harmonising senior-citizen legislation with other protective statutes rather than treating one statutory regime as automatically overriding every competing claim.

The Madhya Pradesh framework provides an important State-level example. The State adopted the Maintenance and Welfare of Parents and Senior Citizens Rules in 2009 and established the institutional structure necessary for implementation. ([Indian Kanoon](#))

Madhya Pradesh has also developed social-security mechanisms through its Department of Social Justice and Disabled Persons Welfare. The State's social-assistance framework includes the Samagra Social Security Pension Scheme and Indira Gandhi National Old Age Pension Scheme. ([Social Justice Department](#))

These programmes demonstrate that economic protection of older persons cannot depend exclusively upon family maintenance.

However, the central challenge remains the gap between **formal rights and effective access to rights**.

The existence of a Tribunal does not guarantee that every older person can approach it. The existence of a pension scheme does not by itself establish that every eligible person can access it. Similarly, property protection may remain ineffective where older persons lack awareness, legal assistance, financial independence, or alternative accommodation.

Consequently, the effectiveness of ageing law should be assessed not merely by counting statutes and institutions but by examining whether older persons can actually use them.

A socially just ageing framework requires coordination between family responsibility, State welfare, legal institutions, healthcare, social-security programmes, and community support.

For Madhya Pradesh, strengthening legal awareness, improving accessibility of Maintenance Tribunals, providing effective legal aid, ensuring accessible social-security mechanisms, and developing stronger coordination between welfare and justice institutions would strengthen the practical implementation of senior-citizen rights.

Ultimately, ageing should not be understood as a condition that diminishes citizenship or legal autonomy. Older persons remain rights-bearing members of society whose dignity, property, economic security, and access to justice require meaningful protection.

The future development of senior-citizen law should therefore move from **formal recognition towards substantive realisation of rights**.

The objective should not merely be to provide welfare to older persons, but to ensure that they can live with **dignity, security, autonomy, and access to justice**.

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