The Fight for Property Rights: How Changes in Movement Actors and History Brought about the Changes in Frames in a Single Movement

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In this article, I argue that the types of frames a movement selects at any given time are reflective of the social composition of the movement and the sociopolitical scenario where the movement is situated. Though there are a number of studies on frames, the framing process, and framing activities, few researchers have explored the relationship between frames and the social composition of the movement. Few studies have referred to this link but have not done explicit research on the topic.1 I argue that the choice of frames that a movement uses is influenced by the movement actors, their strategic choice in target audience, and on the sociopolitical scenario in which the movement is situated. The choice of frames is instrumental in achieving the overall movement goals. Using the movement for the married women’s property rights in India (MWPRI)2 as an example, I demonstrate how the changes in frames that the actors of MWPRI used depended on the changes in social composition of the movement. Additionally these frames played an important role in gaining support from the audience and supporters at various time periods.

The struggle for MWPRI has been much researched by scholars in the area of social movements, historians, and legal experts.3 However, in the previous literature on the topic, there are

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2. I refer to the struggle for property rights among Hindu women in India.

a number of missing gaps in the analysis. First, the struggle for MWPRI has previously not been studied holistically; that is, even though scholars have at times talked specifically about the early-nineteenth-century property reforms, or the reforms and acts that led to the passing of the 1956 Hindu Succession Act, there has been no study that has traced the struggle for property rights for married women from the early beginnings of the nineteenth century to the 1956 code. The MWPRI movement went through three distinct movement phases (1820s to the early twentieth century; 1920s to 1947, and postindependence to 1956). Thus references to property rights for women did not include the movement’s roots in the nineteenth and early-twentieth centuries. Second, because MWPRI stretched for more than a century, it experienced changes in movement actors, participants, strategies, and opposition—all in some way influenced by the changes in social and political climate. The three phases were distinct in terms of characteristics of the actors, supports, participants, and framing strategies. Of interest is an analysis of the changes in the composition and strategies of the MWPRI to determine whether they had any effect on the changing tactics that the movement actors used to achieve their goals. Finally, an in-depth study of the MWPRI offers both historians and social movement scholars newer insights regarding the failure of the 1956 Hindu Succession Act to guarantee property rights to women.

Frames and Social Composition in Social Movements
The term framing or frame refers to the central argument or typically a catchphrase that movement actors use to assign meaning, interpret the relevant cause, and mobilize support. It is used to convey the aim of the social movement for protagonists, antagonists, and bystanders. In other words, frames are an important component of social movements that problematize the meanings associated with the movement, the actors, and their activities. A frame brings into focus the issues that are relevant for the movement in a particular context and time. Framing is a constantly changing process that reacts to the mobilizing process of the movement.

Composition of the movement includes movement actors, who are viewed as signifying agents actively engaged in the production and maintenance of meaning for constituents, bystanders, antagonists, or observers. The actors include the active participants of the movement (activists) and their supporters, who might not be directly involved in the movement. A vital composition of the movement is the audience targeted. Like other compositions of the movement, the audience of a movement undergoes changes at various stages in a movement. Sociopolitical changes and cultural opportunities all have an impact on a movement, which further has an impact on the audience. Because of the changes in political opportunities and social and cultural changes, the “focus group” against whom the movement is directed also changes. In short, all components of the composition of the movement and its influencing factors are dynamic in character. The actors, supporters, and target audience are all influenced by the changes in the sociopolitical environment and cultural opportunities over time, and constantly in turn influence each other’s dynamic character.

Actors have to be strategic in their framing, and they construct frames and tactics in response to oppositions. Movements strategically deploy frames, taking into account their audiences, larger cultural environment, and beliefs. Strategic framing refers to the interaction between movement and its broader environment. While there has been some research on the effect on frames, the relationship between frames and composition of the movement has not been studied systematically. Hence, this study will fill the gap in the analysis of MWPRI by addressing the following research questions:

1. What were the frames created by MWPRI in the different phases of the movement?
2. What were the factors that influenced the creation of these frames?
3. How did these frames affect the movement’s outcomes?

7. Ibid.
8. Benford and Snow, “Framing Processes and Social Movement”; Snow and others, “Frame Alignment Process.”
10. McCammon and others, “No Weapon Save Argument.”
explored in the literature. For instance, Ryan,\textsuperscript{11} in her study on the women’s movement in the United States, recognizes the importance of composition but does not link it to the frames involved in the movement. Other studies too focus on why there are changes in the framing process. Coy and Woehrle’s article suggests that framing activities are not driven simply by the desire of the movement to increase their membership. Many factors influenced and shaped the framing process: multiple audiences, its historic and contemporary collective identity, and desire to gain credibility.\textsuperscript{12} Despite suggestions, none of these studies explain explicitly the link between why and how the frames change in a single movement.

**Data and Methods**

The data for this project were collected using secondary sources (Internet sources, books, journal articles, periodic newspapers, and biographies). Data were particularly hard to get for the nineteenth century. I used newspaper reports, biographies of the reformers, and copies of speeches on the rights for women. Because the debate on property rights for women was joined with demands for widow remarriage, women’s education, and eradication of sati, most of these arguments, speeches, and debates were general in nature. I selected arguments that focused on the “passive position of women” in the society and the need for men to introduce reforms to uplift the position of women in nineteenth-century India. For the data on the twentieth century, I relied on the arguments, speeches, and debates against and for property rights for women. I use descriptive analysis of secondary sources for this project, because getting access to primary sources (original speeches, copies of debates) was rather difficult as very few original papers exist.

**Character of the MWPRI Movement**

The struggle for property rights for married women in India did not consist of a single movement. Its foundation was laid during the Bengal Renaissance in the nineteenth century (1820s) and it went through three phases before the struggle ended with the passing of the Hindu Succession Act (HSA) in 1956. In talking about the radical women’s movement (RWM), Whittier writes that the RWM consists of many organizations, but it is more than the sum of these organizations. It is also made up of individual activists, communities, culture, and identity.\textsuperscript{15} Similar to the RWM, the MWPRI movement, a nonviolent movement, was composed of a number of women’s organizations, individual actors (men and women), and a diverse audience. As the movement stretched over more than one hundred years, the changing political and social climate left its influence on it. As mentioned earlier, MWPRI consisted of three phases: 1820s to the early twentieth century, 1920s to 1947 (the year of India’s independence), and post-independence (1947–50).

The three phases were distinct in terms of their actors, audience, counter actors, social and political climate, and aims (See Tables 1 and 2). The three phases in movement for MWPRI were “united in their character”: they wanted legal change through debates, arguments, petitions, and meetings.

**Three Distinct Phases in MWPRI**

Property laws for Hindu women throughout the centuries were very complicated and were framed within various regimes of religious law that tied her to her position within the family.\textsuperscript{14} The traditional system of inheritance (Dayabarga and the Mitakshara)\textsuperscript{15} recognized female property rights in terms of Stridhan,\textsuperscript{16} but its scope was very limited. Although a woman had

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\textsuperscript{11} Ryan, *Feminism and the Women’s Movement*.


\textsuperscript{15} Under the Dayabarga system of inheritance (which prevailed in Bengal), a man was deemed to be the absolute owner of all his property, both ancestral and self-acquired, and he could dispose of it (sell, mortgage, or gift) as he wished. The division of property among heirs could only take place after his death, and in the first instance the property went equally to his sons. The Mitakshara system distinguished between two types of property: joint family property and separate property. The former consisted of ancestral property and any property that was jointly acquired. It was held by four generations of men, who became a coparcener on birth. The separate property consisted of property that the individual had self-acquired, including inheritance from a person other than his father. The individual had absolute ownership over the separate property.

\textsuperscript{16} Stridhan means “women’s property,” given to her at the time of her marriage by her paternal family in the form of dowry. For more information see Gooroo das Banerjee, *Hindu Law of Marriage and Stridhana* (Delhi: Mittal Publishers, 1984).
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Table 1. Phases in the MWPR

<table>
<thead>
<tr>
<th>Time span</th>
<th>Political climate</th>
<th>Composition of the movement</th>
<th>Audience</th>
<th>Countermovement</th>
<th>Frame</th>
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</thead>
<tbody>
<tr>
<td>1820s to the early 1900s</td>
<td>British colonial influence; everything the “native” represented was in need of reforms</td>
<td>Men: urban, English-educated Indian men, heavily influenced by British ideas</td>
<td>British bureaucrats, who would help in the passing of the necessary reforms; educated Indian men</td>
<td>Orthodox section of the Hindu society, who saw property rights leading to disruption of the traditional joint family, challenging the place of the Hindu woman in her family and religion. They also saw the avocation of women’s property rights as being against religion.</td>
<td>“Emancipation” of women through social reforms</td>
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<tr>
<td>1920s to 1947</td>
<td>Various women’s organizations began to intensify the freedom movement; strengthening of Gandhi’s movement. Gandhi asked women to give priority to freedom struggle; anti-British.</td>
<td>Women: pro-rights; caught between the struggle for freedom and rights for women, supported by the British; some men in the legislature and in the Bar</td>
<td>Women; British government, which had authority to change laws</td>
<td>Struggle for India’s independence became a priority. Right to property began to be seen more as a struggle for upper-class women than for the majority of the Indian women who were poor and thus had no property to inherit.</td>
<td>“Gender equality” more important than freedom struggle</td>
</tr>
<tr>
<td>Independence (1947) to 1956</td>
<td>Independent India building toward the foundations of a modern society, where men and women are equal</td>
<td>Women’s organizations, supported by the government of India</td>
<td>Women; men; and the Indian government</td>
<td>Traditionalists and Orthodox members</td>
<td>“Women’s rights and gender equality” important for India’s development</td>
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absolute control over her Stridhan, it effectively included only movable gifts (such as jewelry, clothes, utensils) that she received from her parents, brothers, and other relatives at the time of her marriage and from her husband after marriage. However, under both systems, Hindu widows could inherit immovable property such as land (from the father or husband) only under the most restrictive circumstances.  

17. Agarwal, *Field of One’s Own.*

Even if the widow came to inherit property from her late husband, as some elite women  did, she would be restricted in her freedom to use the property as she wished. Most women, who donated to temples from the inheritance they got from their late husbands, would do so for the husband’s spiritual well-being. Temple donations were seen as religious, and pious acts were accepted both legally and socially. Women

18. One such woman was Rani Rashmoni of Calcutta (1793–1861), who inherited a lot of property after the death of her husband. Her contribution toward the building of the Dakshineshwar temple is noteworthy.
### Table 2. Key Arguments and Counterarguments

<table>
<thead>
<tr>
<th>Time span</th>
<th>Role of women in the movement</th>
<th>Role of men in the movement</th>
<th>Key arguments for property rights for married women</th>
<th>Key counterarguments</th>
<th>Effect on the property laws</th>
</tr>
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<tr>
<td>1820s to the early 1900s</td>
<td>Women were passive and went on with their household duties. Most of them were unaware of the struggle and their views did not matter to men.</td>
<td>Active role played by the Indian intellectuals who saw the “emancipation of women” as an opportunity to show the British rulers about the advancement of Indian society</td>
<td>“. . . modern expounders of law had deprived them [women] of their right to inheritance and thereby their freedom as well.” “Sympathetic understanding” of the problems of women: “women are in general inferior to men in bodily strength and energy; consequently the male . . . denied to them those excellent merits that they are entitled to by nature, and afterwards they are apt to say that women are naturally incapable of acquiring those merits.”&lt;sup&gt;a&lt;/sup&gt;</td>
<td>Property rights to women will cause a breakdown of the traditional joint family and thus ultimately cause a breakdown of traditional Hindu society. “Is the practice sanctioned by religious texts?”&lt;sup&gt;b&lt;/sup&gt;</td>
<td>No direct effect on property laws for married women. After the 1850s, property rights began to be extended to widows, but the laws were not clear. The 1880s saw a number of legal battles in courts between the widows and male relatives of the husband.</td>
</tr>
<tr>
<td>1920s to 1947</td>
<td>Women’s organizations, particularly AIWC, began to play a very active role in the movement. Women became politically more active.</td>
<td>Majority of the men were against it. At the debates on the bill in 1923, some argued that only “opinions of competent men” should be considered for the bill, as it was “improper for individual members to suggest amendments without consulting the country.”&lt;sup&gt;c&lt;/sup&gt;</td>
<td>Lakshmi Menon, who supported a resolution (1933) to appoint a commission to remove legal disabilities of women surrounding inheritance, said: “The members in the Legislative Assembly, who are men, will not help us in bringing any drastic changes which will be of benefit to us.”&lt;sup&gt;d&lt;/sup&gt;</td>
<td>“Millions of men have no property to transmit to posterity.” —Gandhi, in 1929 “Women and associations of women should be warned that we are plunged into the ocean of Western ways, and we should not allow ourselves to be drowned.”&lt;sup&gt;e&lt;/sup&gt;</td>
<td>Rau Committee that argued for a unified Hindu code, advocating for equal rights in property for both men and women</td>
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<sup>a</sup> Raja Ram Mojan Roy, *His Life, Writings, and Speeches*, (G. A. Natesan and Company, 1822).
<sup>b</sup> Ibid.
<sup>d</sup> Patel, “Hindu Women’s Property Rights in India,” 125.
Table 2. Key Arguments and Counterarguments (Continued)

<table>
<thead>
<tr>
<th>Time span</th>
<th>Role of women in the movement</th>
<th>Role of men in the movement</th>
<th>Key arguments for property rights for married women</th>
<th>Key counter-arguments</th>
<th>Effect on the property laws</th>
</tr>
</thead>
<tbody>
<tr>
<td>Independence (1947) to 1956</td>
<td>Women’s organizations</td>
<td>After independence, the “modernists” were pro-property rights, while the “Orthodox” were against it.</td>
<td>One unified code of inheritance for Hindu women will have far-reaching consequences for modern united India. “The Bill was not a revolutionary measure, and not even a radical measure. It was necessary.”</td>
<td>Supporters of the bill are “a few ultra modern persons in the country who are vocal, but have no real support in the country,” and it was implied that only women of the “lavender, lipstick and vanity bag variety were interested in the bill.” “Are you going to enact a code which will facilitate the breaking up of our households?”</td>
<td>Passing of the 1956 law that guaranteed property rights for married women</td>
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g. Dr. B. R. Ambedkar, quoted in Agnes, Women and Law in India, 139.
h. Agnes, Women and Law in India, 72.
j. Ibid., 16.

were not free to use their wealth in other ways.19 In other words, although the Dayabhaga system of inheritance prevailed in some parts of the country, technologically, women had no property rights. Men almost in all instances inherited the property, and women were confined to the household without any control over the household economy. Lack of education and unawareness of their rights made the situation more dismal for the women.

Phase 1: 1820s to the Early Twentieth Century

The period from the 1820s to 1830s was the age of reform in Colonial India.20 The age of

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19. Agarwal, Field of One’s Own.
The Bengali middle class was at the receiving end of colonial racial jokes and ideas on masculinity. The reinforcement of neo-feudal hierarchies rather than violation of women was tied up with the issue of property rights for women. Particularly important during this time were the arguments that tied together sati and the denial of female inheritance rights. Raja Ram Mohan Roy, one of the icons of the Bengal Renaissance and antisati campaign, argued that “if women were victims of violence . . . it was not merely in the narrow sense of their being physically thrust onto the funeral pyres of their husbands.” 27 “What I lament, is that seeing the women thus dependent and exposed to every misery, you feel for them no compassion that might exempt them from being tied down and burnt to death.” 28

The campaign against sati stressed the need for the woman to inherit property as one of the first steps toward her emancipation, as the root of the problem of sati was denial of property rights. Because women could not inherit property, they had two options: prostitution or a life of dependence. 29 Persistent campaigning by the reformers aided by a few British bureaucrats gradually led to passing of laws

21. Ibid., 68.
22. According to Sartori, “the historical analogy behind the term Renaissance implied a transition to the bourgeois capitalist modernity that never successfully occurred in India, where colonial exploitation had produced deindustrialization, a service class without any dynamic role in production, and the reinforcement of neo-feudal hierarchies rather than vibrant civil society and industrialization” (Bengal in Global Concept History, 69–70).
23. Sartori, Bengal in Global Concept History, 69.
24. Ibid., 59.
25. The Bengali middle class was at the receiving end of colonial racial jokes and ideas on masculinity. The politically self-conscious Bengali intellectuals occupied a unique place, as they represented an unnatural form of masculinity: effeminate babus, who were the lowest order in the politics of colonial masculinity. See Mininalini Sinha, Colonial Masculinity: The “Manly Englishman” and the “Effeminate Bengali” in the Late Nineteenth Century (Manchester, UK: Manchester University Press, 1995).
27. Sartori, Bengal in Global Concept History, 83.
28. Ibid., 68.
29. Ibid., 68.
such as the widow remarriage law and an anti-sati law, by which women began to have some rights over property. In 1856, the Hindu Widow Remarriage Act was passed, whereby a widow, though allowed to remarry, lost claim over her husband’s property. In 1880, by a Privy Council ruling, chastity ceased to be a condition for the widow to maintain her life interest in her husband’s estate.

While the reforms were debated intensely by the men in public forums and in the press, women continued with their usual housework routine. Their views did not seem to matter to the men, and it is probable that only a few knew that they were subjects of controversy. Both the British rulers and the Bengali reformers saw the women as passive subjects of reform. However, there are some references to women who seemed to have an accelerating influence on reforms, though indirectly through the men in their families. Legal battles over property between women and usually a male relative also had an influence in making some changes in the laws of inheritance for women, though often the reformers had no major role in it. Most often, private parties sponsored these court cases. Most of these court cases were between private parties (a woman versus a male member of the family), and the judgments helped to further clarify the status of the widow in regard to the husband’s property after his death. Gradually, the widow began to have some “real” claim to the husband’s property, which was a huge improvement in her status compared to that before the 1820s.

However, the liberal ideological philosophy of early-nineteenth-century Bengal did not develop without its critics. In the 1880s, reaction against the liberal ideology emerged in the form of “Bengali culturalism.” The opposition to the modernization and liberalization of India, particularly through women’s reforms, came from the orthodox sections of the society who argued for the protection of an idealized Indian tradition sanctioned by religion. These religious pundits, who were the moral gatekeepers of Hindu society, viewed women’s property rights as contrary to the sanctions of Hindu religious texts.

**Phase 2: 1920s to 1947**

The late eighteenth and early twentieth century saw the entry of elite and middle-class women in the public sphere in print (biographies) and social reform. However, as Sinha argues, they operated largely under a nationalist male patriarchy. Although the advent of Gandhian nationalism brought about an unprecedented change in the involvement of women in the national sphere, the women’s question was largely ignored in favor of the nationalist cause of getting independence from the British.

Women started actively campaigning for their rights from the 1920s. With the formation of important women’s organizations in the early part of the twentieth century, such as the Women’s Indian Association in 1917 (WIA), the National Council of Women in India (NCWI) in 1925, and the All India Women’s Conference in 1927 (AIWC), property rights became one of the major issues. The WIA and the AIWC had jointly ten thousand members, and from the 1930s onward they focused more directly on the right of women to control and inherit property. The rise of women’s organizations in this period was a result of the inclusion of women in the struggle for India’s independence. Women nationalist leaders such as Kamaladevi Chattopadhyay and Sarojini Naidu raised constant demands for a comprehensive code that would regulate marriage, inheritance, and divorce rights. With more and more women playing an active (political) role outside the home, encouraged and supported by the men, they began to campaign for their own rights to property. Women started advocating for property rights through campaigns, debates, and petitions.

With the impetus given to the women’s movement by the political struggle for independence of 1930, “women were not content with

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34. Sinha, *Colonial Masculinity*, 47.
mere social reforms but asked for complete
equality, political, social, and economic with man.” Arguments like “women’s place to be
equal to that of man” were common in meetings
of the Indian National Congress (INC) in 1931
and the National Planning Committee in 1941.
In the 1930s, women’s organizations formed
committees on legal status, undertook studies
of laws, talked with lawyers, published pam-
phlets on women’s positions, and encouraged
legislation to enhance women’s status. During
this period, the campaigners argued for women
to take a more prominent role in their struggle
for rights. Reflective of this philosophy are state-
ments like the one at the 1933 AIWC meeting:
“The members of the Legislative Assembly who
are men will not help us in bringing any drastic
changes which will benefit women.”

As a result of this change on focus,
throughout 1934, the AIWC launched an inten-
sive campaign to educate women on their rights.
In the same year, November 24 was declared
“legal disability day.” Meetings were held in
every constituency and addressed by lawyers and
prominent citizens, and campaign signatures
were collected to support demands for changes
in law for women’s property rights. Some
prominent men supported the changes in law: Hari Singh Gaur, Sir M. Joshi, and V. V. Joshi.
V. V. Joshi’s 1933 pamphlet on advocating pro-
gressive reforms on property proved influential
on the strategies of the AIWC. The AIWC ap-
pealed to the British government for a commis-
sion consisting of a “non-official majority and a
strong representation of women to enquire into
the present disabilities of women in regard to
inheritance.”

These appeals resulted in the introduction
of the Hindu Women’s Right to Property Act of
1937. The major aim of the bill was to achieve
legal equality between men and women in rela-
tion to property rights. One of the clauses of
the bill was to give women absolute control over
their property. However, the bill was criticized
and the majority of its petitions were declined.
What the act did achieve was to give Hindu wid-
ows some rights to inheritance. But the right
to property did not extend to all women.

The AIWC continued its agitation to de-
mand the equality of women with men, despite
the failure of the Act of 1937. One of the de-
mands was to establish equality of the woman’s
position with that of the man, through the estab-
ishment of the Uniform Civil Code (UCC),
which would replace the various personal laws
for women. However, the demands for the UCC
for women, like all other demands concerning
the equality of women, became secondary in
the fight for freedom from the British.

The British government appointed the
Hindu Law Committee (HLC, or the Rau Com-
mittee) in 1941. There were, however, no women
members on the committee. The HCL strongly
recommended a complete code of Hindu Law,
beginning with the law of inheritance and
followed by the law of marriage and other as-
psects of the Hindu law. The code as envisaged
by the committee would recognize “that men
and women are equal in status with appropri-
ate obligations as well as rights.” The timing
of the committee was unfortunate, as the Con-
gress launched a civil disobedience campaign
against the colonial government. To support a
committee appointed by the British government
implied cooperating with the colonizers. The
women, particularly those who were members
of the Congress Party and the AIWC, experi-
enced a difficult choice: gender rights versus the
struggle for independence for the nation. The
members of the AIWC felt that not many among
the nationalists were their allies when it came
to codifying the Hindu law, since giving women
equal rights in property ownership presented a
threat to male authority.

In January 1944, the British government
reconstituted the Rau Committee to prepare
a Hindu Code. The AIWC carried out a coun-
trywide campaign in favor of codification and
submitted a draft memorandum to the com-
mittee. The committee came out with the Draft
Code. Its main provision, among others, stipu-
lated 1) equal property shares for the son and

36. Hansa Mehta, The Women under the Hindu Law of
Marriage and Succession (English Tract, 1943).
37. Basu and Ray, Women’s Struggle.
38. Agnes, Women and Law in India, 67.
40. Agnes, Women and Law in India, 68.
41. Ibid., 192.
42. Agarwal, Bargaining and Legal Change; Basu and
Ray, Women’s Struggle.
the widow of the deceased, and half of the son’s shares for the daughters in all estate inheritance; and 2) an absolute estate for the widow (as opposed to the limited estate).

There were black flag demonstrations opposing the Code in five cities, including Calcutta (Bengal). Reactions from the women were mixed. The AIWC supported the Draft Code, while advocating equal inheritance rights for sons and daughters. The NCWI, several other women’s groups, especially from Bombay and Calcutta, as well as several individual women (including a number of advocates) all supported the Code; but women in orthodox associations such as the All India Hindu Women’s Conference opposed it. Among men, though some supported the Code, the majority opposed it using various arguments: women were incapable of managing property and were more likely to be duped by male relatives if given an absolute estate; married daughters already received a share as dowry; married daughters only needed maintenance and provisions for their marriage expenses; and so on. In 1947, despite strong opposition, the Rau Committee submitted a revised draft of the Hindu Code Bill (HCB), which was introduced in the Legislative Assembly.

The second phase in the MWPRI saw women playing a very active role in the campaign for property rights, while the men were more active in the freedom struggle. The frame used was “gender quality” to advocate for equal rights in property for women along with men.

**Phase 3: 1947 to 1948**

In 1948, a year after India’s independence, a revised version of the HCB was introduced in the new parliament and was the subject of intense debate. While the AIWC continued to campaign extensively for the bill, its constituency was largely confined to the literate urban population, as it had been before independence. This reduced the effectiveness of the campaign, and the opposition termed the bill an “elite demand.”

In the 1950s, the AIWC once again started intense campaigning for the property rights of women in the HCB. They sought to mobilize public opinion by publishing articles in English-language periodicals, met with politicians, and attended Legislative Assembly sessions when bills concerning property rights came up.

After the results of the first democratically held election in India, Jawaharlal Nehru was finally able to win passage for the important aspects of the HCB in four separate acts. Of these, the Hindu Succession Act of 1956 forms the basis of Hindu succession laws today. Married women finally had an equal claim to their father’s and husband’s property.

The proponents of the struggle for the MWPRI after 1947 were both women and men in parliament (including Prime Minister Nehru) who wanted to develop the foundations of a modern India, where men and women are seen equally in the eyes of the law. The opposition came from the orthodox members of the society, who argued against the movement as an elite women’s campaign that would ultimately lead to the breakdown of the family.

**Movement Composition and Frames**

The MWPRI movement went through three different phases that were differentiated by the political climate, composition of the movement, counter actors, and the frames. In phase 1, during the period of the Bengal Renaissance, the British ideas on education and civilization and their views on “native India” influenced the actors. The actors were primarily Indian men who were English educated and wanted to emancipate the society and its female members in order to “rise up” in the eyes of the British rulers. The frame used during this time was “emancipation through social reforms.” The term *emancipation*, meaning “to free,” had a patriarchal flavor to it. Emancipation represented the passiveness of the woman and her helplessness, her dependence on the man to “free” her from orthodox laws of property.

However, the “woman question” was used to benefit the interests of the indigenous elite and the colonizers, and not so much the women themselves. During this phase, the status of the woman was seen as the index of India’s social backwardness, and the emerging Indian elite
saw her emancipation as a part of reformation on class and caste identity. The colonizers, on the other hand, were critical of India’s indigenous society, particularly of the caste system and the condition of women, both of which reaffirmed their ideas on the backwardness of the country and thus the need for “benevolent paternalism of colonial rule.” Imperialists who championed the Indian women’s cause did so by pitting the women’s social reforms against indigenous political reforms. Their arguments were that Indians should put their homes in order before pressing for political demands.45

With the advent of the women’s organizations and active participation of women in the property rights struggle, the frame changed from social reform to “complete equality of women in the property rights.” Gender equality was not an issue in the Renaissance period. The actors, men, were interested in granting some rights to women, to make Indian society look favorable in the eyes of the British rulers. But with the inclusion of women in the political sphere, women were not just interested in social reforms. They wanted equality in property rights. The intensification of the struggle for India’s independence brought the women to the political struggle. The composition of the movement changed from being composed of men only to being composed of women primarily, supported by few women. The cry for “gender equality” in property rights represented the struggle for the MWPRI to be against the orthodox traditional laws. The movement during this phase targeted solely women as their audience.

In the third and final phase of the MWPRI, the women’s organizations were joined with men, who represented the “modern” Indian, in their struggle for rights. The frame used during this period was “women’s rights and gender equality important for India’s development.” The independence of India and development of India into a modern democracy had an influence on the supporters of the MWPRI, who saw women’s rights and gender equality as crucial for the development of India.

Conclusion
Whittier46 argues that social movements are far from being just an organization: they are identity, community, and culture. The entire structure and composition of a movement is dynamic. Analysis of the MWPRI movement demonstrates how members of a movement play a crucial role in its organization, particularly in relation to choice of frames. This article does acknowledge that differences in the composition of a movement lead to different strategies for framing and thereby different strategies to attract audiences and deal with opposition. Coy and Woehrle47 argue that all framing activities are performed with a view to gain a voice in public debate, which in turn creates oppositional forces, sustains members, and influences public policy.

46. Whittier, Feminist Generations, 22.
47. Coy and Woehrle, Constructing Identity.