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2026 SCC OnLine SC 650

In the Supreme Court of India

(Before Vikram Nath and Sandeep Mehta, JJ.)

Sathyan Naravoor ... Petitioner(s);

Versus

Union of India and Others ... Respondent(s).

Writ Petition (Civil) No(s). 182 of 2025[§]

Decided on April 21, 2026

Constitution of India — Article 21 — "Life" — Meaning and Scope : Broadly construed — Rights covered — Dignity, Right to — Prisoners/convicts, Rights of — *Arts. 21 and 14 — Institutional safeguards and rights of prisoners with disabilities — Implementation of RPwD Act, 2016 — Only 12 States and UTs filed compliance affidavits in pursuance of directions issued in* L. Muruganantham, *(2025) 10 SCC 401 and* Sathyan Naravoor, *2025 SCC OnLine SC 2738 — Held, matter requires scrutiny whether constitutional obligations under Arts. 21 and 14 and legislative mandate in Rights of Persons with Disabilities Act, 2016 (RPwD Act) are being realised or not — Emphasis laid on the need for effective, structured, and uniform mechanism to address the issues — Held, High-Powered Committee constituted in* Suhas Chakma, *2026 SCC OnLine SC 317, empowered to appropriately address the issues and deliver structured and expert driven assessment — Mandate of the High-Powered Committee expanded to examine institutional safeguards for disabled prisoners across all prisons — Directions issued for authorities concerned to file timely compliance reports and ensure active participation in the proceedings — Criminal Law — Prisons, Prisoners and Probation of Offenders — Mentally ill/handicapped prisoners/Physically challenged/Disabled persons/Reasonable accommodation — Criminal Law — Prisons, Prisoners and Probation of Offenders — Prisoners Rights and Prison/Jail Reforms — Human and Civil Rights — Prisoners/Convicts/Undertrials Rights/Prison Reform*

Advocates who appeared in this case :

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Mrs. Aishwarya Bhati, A.S.G., Ms. Shivika Mehra, Adv., Ms. Sonali Jain, Adv., Ms. Hemandri Sharma, Adv., Mr. Rohit Ojha, Adv., Ms. Ruchi Kohli, Adv., Ms. Chitrangda Rashtravara, Adv., Mr. Alankar Gupta, Adv., Mr. Shashwat Parihar, Adv., Dr. N. Visakamurthy, AOR, Mr. Alok

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The Order of the Court was delivered by

SANDEEP MEHTA, J.:— The present proceedings bring to the fore issues of considerable importance concerning the rights, conditions of detention, and institutional safeguards available to prisoners with disabilities within prison systems across the country. The matter necessitates a closer examination of the extent to which the mandate of

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the Rights of Persons with Disabilities Act, 2016[1], and the constitutional guarantees of dignity, equality, and non-discrimination are being effectively realised in custodial settings, and whether adequate mechanisms exist to secure their meaningful implementation.

2. This Court, *vide* order dated 2nd December, 2025, noted that the grievances raised by the petitioner herein stand substantially ventilated by the directions issued by this Court in *L. Muruganantham* v. *State of Tamil Nadu*[2]. In the said decision, this Court laid down an exhaustive framework to safeguard the rights of prisoners with disabilities, *inter alia* directing identification of such prisoners at the time of admission, provision of accessible infrastructure including ramps and accessible toilets, availability of healthcare and assistive devices, training and sensitisation of prison staff, conduct of accessibility audits, maintenance of disability-related data, formulation of inclusive prison manuals, establishment of monitoring mechanisms, and submission of periodic compliance reports to ensure effective implementation of the mandate of the RPwD Act, 2016 and constitutional guarantees.

3. However, having regard to the submissions advanced by learned counsel appearing for the petitioner, this Court deemed it appropriate to issue certain further directions, in addition to those contained in *L. Muruganantham* (supra). In brief, this Court directed that the directions issued in *L. Muruganantham* (supra) be extended to all States and Union Territories; that a robust, independent and accessible grievance redressal mechanism be established for prisoners with disabilities; that facilities for inclusive education be ensured; that the provisions of Section 89 of the RPwD Act, 2016 be made applicable to prison establishments, along with appropriate awareness and sensitisation measures; that the States and Union Territories indicate structured mechanisms for the provision of assistive devices and support equipment; and that enhanced visitation rights be extended to prisoners with benchmark disabilities. It was further directed that all States and Union Territories shall file comprehensive compliance reports within the stipulated period, clearly indicating the measures undertaken for effectuating the directions issued in *L. Muruganantham* (supra) as well as those mandated *vide* order dated 2nd December, 2025 in the present proceedings. The relevant extracts from the said order are reproduced hereinbelow:—

> "9. We have considered the above submissions advanced by Mr. Kaleeswaram Raj, learned counsel representing the petitioner. Learned counsel for the Union of India and respective States do not object to the inclusion of more directions in addition to those already given in *L. Muruganantham* (supra).
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> 10. In view of the aforesaid discussion, we hereby direct that, in

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addition to the salutary directions set out in *L. Muruganantham* (supra), the following directions shall also be read in conjunction with the mandate of the said judgment:—

A. The directions issued by this Court in *L. Muruganantham* (supra) shall be extended to all the States and the Union Territories, to ensure that the principles are adopted mutatis mutandis within their prison systems as well.

B. Every State and Union Territories shall establish a robust, independent and accessible grievance redressal mechanism specifically designed for prisoners with disabilities. The said mechanism shall ensure prompt registration, effective monitoring and timely resolution of complaints, so as to safeguard inmates from systemic neglect, abuse and discriminatory practices.

C. Appropriate facilities shall be created to ensure that prisoners with disabilities have meaningful access to inclusive education within the prison system. No inmate shall be deprived of the opportunity to pursue educational programmes solely on account of disability, and suitable adjustments shall be made to facilitate their effective participation.

D. Section 89 of the RPwd Act shall mutatis mutandis be made applicable to prison establishments across the country. All prison authorities shall take adequate steps to disseminate awareness of the obligations flowing from the said provision to all officers, staff, legal-aid personnel, and other stakeholders.

E. Learned counsel appearing for the petitioner has sought directions for the provision of appropriate assistive devices, mobility aids, and other support equipment to prisoners with disabilities. However, considering the crucial issue relating to prison security and the practical modalities of implementation, we, for the present, deem it appropriate to call upon all States and Union Territories to indicate in its compliance report the structured institutional mechanism proposed to ensure the regular availability, maintenance, and secure provision of assistive devices, mobility aids, and other disability-support equipment for prisoners with disabilities. The affidavit shall clearly outline the procedures, infrastructure, procurement systems, supervision protocols, and security measures by which such assistive aids will be made accessible to inmates, enabling them to carry out their daily activities with dignity without compromising institutional safety.

F. Prisoners with benchmark disabilities shall be entitled to enhanced visitation provisions, in order to ensure sustained family support, emotional well-being, and continuous

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monitoring of their special needs. The specific modalities for such visitation shall be framed by the concerned departmental head of each State and Union Territory so as to balance security considerations with the imperative of accessibility and humane treatment.

11. All States and Union Territories are hereby directed to place on record a comprehensive compliance report before this Court within four months from today, indicating the measures undertaken for effectuating the directions issued in *L. Muruganantham* (supra) as well as those mandated herein. The report shall clearly set out the steps adopted, the progress achieved, and the modalities evolved for ensuring faithful implementation of the aforesaid directions in the prisons located within their jurisdictions."

4. Thereafter, the matter came up for hearing on 8th April, 2026 for the purpose of receiving compliance reports from the States and Union Territories. On the said date, the submissions advanced by learned counsel appearing for the petitioner, as well as those representing the respective States and Union Territories, were heard at some length. It was also brought to our notice that only 12 States and Union Territories have, thus far, filed their compliance affidavits.

5. Upon bestowing our anxious and thoughtful consideration to the submissions advanced by learned counsel for the parties, we are of the considered opinion that the issues raised in the present proceedings can be more appropriately, effectively, and comprehensively addressed by the High-Powered Committee constituted by this Court in the matter of *Suhas Chakma* v. *Union of India*[3], *vide* its judgment dated 26th February, 2026. The High-Powered Committee, having already been entrusted with the mandate of overseeing systemic concerns relating to the harmonisation of the Rules framed by the States and Union Territories in respect of Open Correctional Institutions, is suitably equipped to examine the present issues in a holistic manner. The entrustment of the issues raised in the present matter to the High-Powered Committee would ensure a structured, continuous, and expert-driven assessment of the prevailing statutory frameworks, along with the practices and facilities extended to prisoners with disabilities across all the States and Union Territories, thereby obviating any fragmentation of proceedings and enabling a cohesive implementation of the directions already issued by this Court.

6. Such an approach would, in our considered view, yield manifold benefits. It would facilitate a coordinated and uniform framework across all the States and Union Territories, guided by the institutional expertise of the High-Powered Committee and informed by ground-level realities. The High-Powered Committee would be well placed to

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undertake periodic review, call for necessary reports, and evolve pragmatic solutions tailored to administrative and infrastructural constraints. Further, it would provide an accessible and specialised forum for the consideration of grievances, ensuring that issues are not only identified but also addressed in a time-bound and effective manner. This mechanism would, thus, strengthen compliance, enhance accountability, and advance the constitutional objectives of dignity, equality, and substantive access to justice for prisoners with disabilities. We are informed that the functioning of the High-Powered Committee is still at a nascent stage and therefore, the incorporation of this additional mandate, being of utmost significance, would in no manner encumber its proceedings.

7. In view of the aforesaid discussion, and having regard to the need for an effective, structured, and uniform mechanism to address the issues highlighted in the present proceedings, we deem it appropriate to issue the following directions:—

A. The Secretary, Department of Empowerment of Persons with Disabilities, Union of India (or his nominee not below the rank of Additional Secretary), shall forthwith start active participation in the proceedings before the High-Powered Committee.

B. The Secretaries of the Department of Social Justice and Empowerment/Department of Social Welfare of all States and Union Territories (or their nominees not below the rank of Additional Secretary) shall also join the proceedings and ensure effective representation before the High-Powered Committee with immediate effect.

C. All the States and Union Territories shall place their compliance affidavits before the High-Powered Committee within a period of six weeks from the date of this order.

D. The petitioners as well as the intervenor(s) are permitted to participate in the proceedings before the High-Powered Committee and shall be at liberty to file their representations along with any relevant material, before it. The High-Powered Committee shall duly consider such representations in accordance with law while discharging its mandate.

E. The High-Powered Committee shall ensure due and effective compliance by all States and Union Territories with the directions issued by this Court in *L. Muruganantham* (supra), as well as those mandated *vide* order dated 2nd December, 2025 in the present proceedings. For the said purpose, it shall be empowered to issue such directions to the concerned departments of the States/Union Territories, as may be necessary for effective implementation.

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F. The High-Powered Committee shall formulate a comprehensive and implementable action plan for the provision of appropriate assistive devices, mobility aids, and other necessary support equipment to prisoners with disabilities, ensuring that such measures are tailored to their specific needs and functional requirements. The said action plan shall also lay down uniform standards, modalities of procurement, maintenance protocols, and safeguards, while duly taking into account the security considerations inherent in prison administration, so as to facilitate its effective and consistent adoption by all the States and Union Territories.

G. The High-Powered Committee shall be at liberty to seek assistance from expert institutions, specialised bodies, and organisations working in the field of persons with disabilities, and may engage with domain experts, civil society organisations, and other stakeholders, as may be required, for the effective and informed discharge of its functions. The expenses incurred in this exercise shall be borne by the Ministry of Social Justice and Empowerment, Union of India as may be directed by the High-Powered Committee.

H. The Chairperson of the High-Powered Committee shall devise appropriate modalities governing its functioning and schedule of meetings, so as to suitably delineate and, where necessary, segregate its consideration of issues pertaining to Open Correctional Institutions from those arising in the present proceedings, ensuring focused and effective examination of both domains.

I. The High-Powered Committee shall, as far as feasible within a period of four months, submit a consolidated status report before this Court indicating the progress made, challenges encountered, and further measures proposed for ensuring full compliance with the directions issued by this Court.

J. All the States and Union Territories shall extend full cooperation to the High-Powered Committee and ensure that all requisite data, records, and logistical support are made available to it in a timely manner.

8. The Registry is directed to forthwith transmit a copy of this order to the Hon'ble Chairperson of the High-Powered Committee for necessary compliance.

9. Before parting, it is necessary to emphasise that the directions issued herein are firmly grounded in the constitutional guarantees of dignity, equality, and substantive justice. The rights of prisoners with disabilities must be recognised and effectuated in a manner that accords with a humane, rights-based approach, ensuring that

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incarceration does not, in any manner, dilute or abridge the fundamental protections enshrined under Articles 14 and 21 of the Constitution. The concerned authorities are, therefore, duty-bound to ensure faithful and effective implementation of these directions, in both letter and spirit.

10. List this matter on 1st September, 2026, along with Writ Petition (Civil) No. 1082 of 2020 (*Suhas Chakma* v. *Union of India*).

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[1] For short, "RPwD Act, 2016"

[2] (2025) 10 SCC 401.

[3] 2026 SCC OnLine SC 317.

[§] 2026 INSC 397

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