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L. MURUGANANTHAM V. STATE OF TAMIL NADU (2025)

ZEEL AGRAWAL

1. INTRODUCTION AND CITATION

The decision in *L. Muruganantham v. State of Tamil Nadu & Ors.* (2025 INSC 844) marks a significant development at the intersection of prisoners' rights¹, disability rights, and public law compensation. Arising from the illegal arrest and short-term incarceration of a disabled advocate, the case transcends individual relief and evolves into a landmark judgment on disability-inclusive prison reform under Articles 14 and 21² of the Constitution, the Rights of Persons with Disabilities Act, 2016 (RPwD Act)³, and the UN Convention on the Rights of Persons with Disabilities (UNCRPD)⁴.

2. FACTS AND PROCEDURAL HISTORY

The appellant, an advocate suffering from Becker Muscular Dystrophy, had a disability assessed at 70% in 2013 and 80% in 2020. He also claimed Autism Spectrum Disorder and related psychological conditions. According to him, a property dispute with his paternal uncle led to a false criminal complaint through one Selvakumar, resulting in the registration of an FIR under Sections 294(b), 323 and 506(ii) IPC and his arrest on 29 February 2020, allegedly in violation of the safeguards laid down in *Arnesh Kumar v. State of Bihar*⁵.

The appellant was remanded to Central Prison, Coimbatore, where he remained from 29 February to 10 March 2020. During custody, he alleged denial of physiotherapy, psychotherapy, a medically appropriate diet, accessible toilets and ramps, and a sensory-friendly environment, resulting in deterioration of his health. After release on bail, he approached the Tamil Nadu State Human Rights Commission (SHRC), seeking compensation of Rs. 50 lakhs for violation of his rights, Rs. 2 crores for a Disability Rights Public Fund, and systemic directions for implementation of the RPwD Act and UNCRPD.

By order dated 27 August 2021, the SHRC held that the arrest violated *Arnesh Kumar*, found the arresting officer responsible for human rights violations, and awarded compensation of Rs.

¹ *L. Muruganantham v. State of Tamil Nadu*, 2025 INSC 844.

² INDIA CONST. arts. 14, 21

³ Rights of Persons with Disabilities Act, No. 49 of 2016, INDIA CODE (2016).

⁴ Convention on the Rights of Persons with Disabilities, Dec. 13, 2006, 2515 U.N.T.S.

⁵ *Arnesh Kumar v. State of Bihar*, (2014) 8 SCC 273

1,00,000 recoverable from the officer. However, it dismissed the complaint against prison authorities, noting that the appellant had been admitted to the prison hospital and provided treatment. The SHRC nevertheless recommended that prisons be made accessible in accordance with *Rajiv Raturi v. Union of India*⁶.

The appellant challenged the order before the Madras High Court seeking enhanced compensation, action against prison officials, and wider reforms. The arresting officer also challenged the SHRC findings. By a common order dated 29 November 2022, the High Court dismissed the officer's petition, enhanced compensation to Rs. 5,00,000, and awarded Rs. 25,000 as costs. While affirming that the arrest and incarceration constituted a human rights violation, it agreed that no serious violation by prison authorities had been established.

After the State complied with the order, the appellant approached the Supreme Court seeking further compensation, liability of prison authorities, and broader systemic reforms.

3. ISSUES

The Supreme Court considered two principal issues:

1. Whether the High Court's enhancement of compensation to Rs. 5,00,000, while declining to hold prison authorities liable, required interference.
2. Whether prisons in Tamil Nadu were providing adequate facilities to prisoners with disabilities in compliance with the RPwD Act and UNCRPD, and what systemic directions were necessary.

4. ARGUMENTS

The appellant, appearing in person, argued that his arrest was motivated by a property dispute and carried out in violation of *Arnesh Kumar*. He contended that the denial of physiotherapy, psychotherapy, a medically appropriate diet, accessible infrastructure, warm water, and a low-sensory environment aggravated his disability and mental health conditions. He further argued that compensation remained inadequate and that prison authorities should be held accountable for the deterioration of his condition.

The appellant also highlighted broader systemic deficiencies, including lack of disability sensitisation programmes, a non-compliant Prison Manual, and failure to maintain disability-disaggregated prison data contrary to Article 31 of the UNCRPD. Reliance was placed on *Vikash Kumar v. UPSC*⁷, *Jeeja Ghosh v. Union of India*⁸, and *Re: Inhuman Conditions in 1382 Prisons*⁹.

The State and prison authorities contended that the appellant was continuously treated as an inpatient in the prison hospital and provided with special facilities, psychiatric counselling, dietary support, and assistance in accordance with prison rules. They argued that while certain preferred amenities may not have been available, no deliberate neglect or serious human rights violation by prison officials had been established.

⁶ *Rajiv Raturi v. Union of India*, (2018) 2 SCC 413.

⁷ *Vikash Kumar v. Union Public Service Commission*, (2021) 5 SCC 370

⁸ *Jeeja Ghosh v. Union of India*, (2016) 7 SCC 761

⁹ *Re: Inhuman Conditions in 1382 Prisons*, (2016) 3 SCC 700

5. JUDGMENT AND RATIO DECIDENDI

On the first issue, the Supreme Court affirmed the findings of the SHRC and the High Court that the appellant had been falsely implicated and illegally arrested in violation of *Arnesh Kumar*, and that his disability status was not adequately considered during arrest. The Court held that such illegal arrest and custodial harassment of a disabled person constituted a violation of Articles 14 and 21, attracting public law compensation. However, it upheld the High Court's award of Rs. 5,00,000 as fair and reasonable, considering the brief duration of custody and the circumstances of the case.

A key aspect of the judgment was the distinction drawn between institutional inadequacies

and individual culpability. The Court observed that the appellant had been housed in the prison hospital and provided certain special facilities. It held that deficiencies arising from systemic constraints could not automatically be attributed to individual prison officials unless deliberate or gross negligence was established. Consequently, it declined to impose liability on prison authorities or enhance compensation further.

On the second issue, the Court delivered a significant rights-based ruling. It held that inaccessible prison infrastructure and denial of reasonable accommodation to prisoners with disabilities violate Articles 14 and 21, the RPwD Act, and Article 15 of the UNCRPD¹⁰. Reaffirming that incarceration restricts liberty but not dignity, the Court held that prisoners with disabilities are entitled to accessible facilities, adequate healthcare, therapies, and assistive devices equivalent to those available in the community. Financial or logistical constraints, it stated, cannot justify non-compliance with these obligations.

The judgment thus expands the scope of Article 21 and the RPwD Act into the prison context by recognising accessibility, healthcare, and reasonable accommodation as enforceable constitutional entitlements of disabled prisoners.

6. DIRECTIONS AND STRUCTURAL REFORM

Treating the case as an opportunity for broader institutional reform, the Supreme Court issued extensive directions to the State of Tamil Nadu. It ordered identification of prisoners with disabilities at admission, provision of information in accessible formats, conduct of prison accessibility audits in accordance with the Harmonised Guidelines on Universal Accessibility¹¹, and adoption of universal design measures including ramps, accessible toilets, and sensory-friendly spaces.

The Court further directed the provision of therapies, assistive devices, and healthcare equivalent to community standards. It mandated regular sensitisation programmes for prison personnel and medical officers, revision of the Prison Manual to align with the RPwD Act and

¹⁰ Convention on the Rights of Persons with Disabilities art. 15, Dec. 13, 2006, 2515 U.N.T.S. 3.

¹¹ Ministry of Housing & Urban Affairs, Government of India, *Harmonised Guidelines and Standards for Universal Accessibility in India* (2021).

UNCRPD, and maintenance and publication of disability-disaggregated prison data subject to¹²privacy safeguards.

By incorporating standards reflected in the Nelson Mandela Rules¹³ and the UN Handbook on Prisoners with Special Needs¹⁴, the Court transformed international human rights norms into concrete obligations and established a persuasive model for disability-inclusive prison administration across India.

¹² Ministry of Housing & Urban Affairs, Government of India, *Harmonised Guidelines and Standards for Universal Accessibility in India* (2021).

¹³ G.A. Res. 70/175, United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules) (Dec. 17, 2015).

¹⁴ U.N. Office on Drugs and Crime, *Handbook on Prisoners with Special Needs* (2009).