

## **Behind Bars and Beyond: Navigating the Terrain of Gender Justice in Indian Prison**

Sofia Khatun<sup>1</sup>, Sivananda Kumar K<sup>2</sup>.

### **Abstract**

The research aims to compile data on the challenges faced by women in prison and the available legal remedies for their plight. To guarantee women prisoners' protection and provide a non-custodial degree of punishment, the Bangkok Rules was established in 2010 by the United Nations General Assembly. Overcrowding, inadequate sanitation and cleanliness, poor nutrition, a lack of education, violence, and the hazards of pregnancy and child care are merely some of the physical and mental difficulties that women confront in prisons in India. Women are safeguarded against exploitation and granted access to essentials by a multitude of laws, regulations, and standards. In reaction to human rights violations against such convicts, the Indian judiciary has vigorously interpreted Articles 19, 21, 22, 37, and 39 A of the Indian constitution. *What options does a woman have when "caretakers" are turned into abusers?* Their predicament is exacerbated by the prevailing state of prisons, gender bias, abuse while incarcerated, harsh treatment of children, inadequacy of fundamental human rights, and restricted availability of prison resources. The research envisages the pressing need for improvements by addressing women's rights, challenges, and variables in prison.

**Keywords:** Prison, Women, Constitution of India, Rights, Bias, Challenges, Exploitation.

### **Introduction**

*“A nation's status can be revealed by looking at the status of its women.”*

--- Pandit Jawaharlal Nehru.

Incarceration has been an integral part of the criminal justice system since the dawn of civilization (S. Khan, 2023). But this prediction was at odds with reality, and incarceration frequently produced the reverse effect. As behavioural sciences advanced, it became clear that encapsulating prisoners wasn't helping them change their way (Mohanty, 2013). The correctional system was premised on the proposition that it should cultivate a sense of civic responsibility and

---

<sup>1</sup>Doctoral Research Scholar (Law) CHRIST University, Bangalore (IN). She is the correspondence author of the paper. [Sofia.khatun@res.christuniversity.in](mailto:Sofia.khatun@res.christuniversity.in), Orcid Id: [0000-0002-7400-9951](https://orcid.org/0000-0002-7400-9951)

<sup>2</sup>Associate Professor (Law), CHRIST University, Bangalore (IN). [Sivananda.kumar@christuniversity.in](mailto:Sivananda.kumar@christuniversity.in), Orcid Id: [0000-0003-4807-0481](https://orcid.org/0000-0003-4807-0481)

disdain for illegal activities among the people thereby transforming them into law-abiding citizens (Anand, 2021). Indian society has always been patriarchal, which has left women feeling inferior to men (Kasera, 2020). Aspiring to fulfil their most fundamental needs, several women from lower socioeconomic backgrounds are coerced into engaging in illicit activities, such as drug trade, theft, and prostitution. Despite the existence of legislation intended to protect women, the question that arises is whether or not it has attained the objectives established by the framers. The patriarchal society has long held the view that women are inherently inferior; as a result, the stigmatization, condemnation, and punishment of women make their place in society even more precarious (Kumar, 2023). The enormous discretion enjoyed by prison and police personnel constitutes a flagrant disregard for their fundamental human rights. Restorative justice initiatives that have profited from India's infrequent jail reforms have rarely reached and as a result of societal and economic trends, female misconduct is becoming more apparent and pervasive, which has increased the necessity of disciplinary punishment (NHRC, 2021).

### **Objectives**

1. To assess the correctional facility approaches towards women prisoners.
2. To what extent agencies and organizations are rehabilitating and reforming imprisoned women.
3. To discuss the difficult circumstances faced by women in prison.
4. To symbolize stringent responses to the concerns of female prisoners.

### **Research Methodology**

This research includes critical evaluations and theoretical considerations. The theoretical review, conducted with thorough precision, consists of an in-depth analysis of the Cr.P.C. and Indian Penal Code (IPC) laws intended to protect and secure women in captivity. Exploration of legislative laws, which encompasses discussions of cases and judgments, is a pervasive aspect regarding women prisoners.

### **Social Challenges**

*"Prisoners are constructed with the stones law"*

--- Justice Krishna Iyer.

The primary assumption of the most extensive efforts to reform the penal system is that this can be accomplished without a fundamental alteration to the structure of society as a whole (NLSA, 2018). Both the liberal and radical schools of thought on prison reform hold that necessary changes within the system are

possible apart from societal shifts. Prisoners enjoy a wide range of social rights while behind bars, including the following:

- a) Literacy
- b) Supportive parole system
- c) Ability to interview potential employers
- d) An understanding of and capacity to carry out religious rites during incarceration
- f) The possibility of being extricated from prison while pending charges under the National Drug Policy System (NDPS).

### **Legal Viewpoint: Constitutional Status of Incarcerated Women**

The Constitution of India upholds equality and believes in protecting and promoting women's and children's rights. '*The ideals and aspirations of the people of India*' and '*Equality of reputation and opportunity*' are well-reflected in the Preamble (Mordhwaj, 2021). In 1993, India introduced the Protection of Human Rights Act and set up the National Human Rights Commission to advocate 'for' and 'protect' human rights. Human Rights Units and 'the various' international conventions that India has ratified do not make any special case for securing women's rights (Aggarwal, 2022). In the case of (*Sunil Batra v. Delhi Administration 1979*), the court held that an individual cannot be impeccunious of his freedom through "proper, just, and fair" means in prison or outside. When a criminal is sentenced to jail, the process is more like a blighted institutionalization aimed at a social fit than a blind reformatory agony. In (*R.D. Upadhyaya v. State of Andhra Pradesh & Ors (Civil Writ Petition No. 559 of 1994)*, 2006), the court reinforced the vitality of ensuring that prisons have adequate pre- and post-natal care facilities before incarcerating pregnant women. Additionally, the court mandated that expectant mothers undergo gynaecological screenings at the District Government sanatorium. (Fathima, 2017).

### ***Right of Women Prisoners: Substantive Law***

The surge has undoubtedly been characterized by a variety of forms of violence against women, including custodial violence related to rape and molestation (Mondal & Srivasthava, 2023). The egregious form of violence against women is rape in the police station or administered by the police. There have been several rulings (*Tuka Ram And Anr v. State of Maharashtra, 1978*) demonstrating that the rape under Section 376 of the Indian Penal Code is inadequate. Sections 376B, 376C, and 376D were inserted into the penal code in 1983 as the second key amendment to address custodial sexual abuse that did not qualify as rape. These sections resulted in penalties for individuals who exploited

their official roles to engage in sexual intercourse with a woman in a reputable position on reliable premises (NCPCR, 2021).

### ***Right of Women Prisoners: Procedural Law***

The Criminal Procedure Code (Cr.P.C) strives to construct a system that used to enforce criminal regulations in a clear and appropriate manner. Such a framework aims to assist with crime prevention, gathering evidence, conducting trials to determine guilt or innocence, and reprimanding individuals found guilty (Sharma & Gaur, 2021). The arrest of a woman after sunset and before sunrise is prohibited under Section 46(4), except in exceptional circumstances. When a female undergoes a medical examination, Section 53 of the Cr.P.C. mandates that the assessment be conducted under the supervision of a female registered medical officer to ensure its effectiveness. Regarding expectant mothers and mother-child units, one question arises: *Whether these groups of women should ever take custody penalties?* Supposedly, a female sentenced to death is discovered to be pregnant, in that case, Section 416 of the Code of Criminal Procedure, 1973 stipulates that the High Court may postpone the execution of the sentence or commute it to life imprisonment if it deems it to be appropriate (Prakash, 2022).

### **Key Finding(s)**

The reformation endeavours to guarantee that women receive primary services and are safeguarded from exploitation in prisons; however, their implementation needs to be improved by more legal guidelines and policies. Despite the current challenges, there is a significant potential for positive change. With proper guidelines and policies for implementation, prisons can overcome the lack of enough qualified female staff, housing, or sanitary services to meet the mental, reproductive, and physical health needs of the prisoners.

### **Challenges faced by Women Prisoners**

#### ***I. Poor living standards***

Instead of smoothing out prison life, let's strive to make it more *human* and *realistic*. The prisoners are human beings, and endure terrible conditions due to overcrowding. The plight of inmates at the Tiruchirappalli women's prison in Tamil Nadu, who were forced to use dust to clean their toilets due to a lack of water is just a case in point (OHCHR, 2010). According to an official report, Murugeswari, a prisoner in Tamil Nadu from 2005 to 2010, penned "*water became so scarce that they had to pick between washing themselves and their garments.*"

#### ***II. Inaccessibility to legal representation***

During the arrest, the courtroom ruled that everyone be given free prison resources, but in reality, the prison assistance is only offered during the trial (Maniyar, 2022). Similarly, the Criminal Resource Boards were established at federal and state levels to provide free criminal resources to the impoverished and needy through the Legal Aid Services Authorities Act of 1987.

### ***III. Physical mistreatment***

Officials have remarked time and again the issue of physical mistreatment of prisoners on account of either inadequate infrastructure or hostile prisoner ration, or both. The courts repeatedly identified the rehabilitation of criminals as one of the primary functions of the prison administration (Vardhan, 2020).

### ***IV. Food, lodging, and medical care***

Every prisoner must have the right to food, water, shelter, clothing, bedding and undergo a clinical evaluation upon admittance to a prison. In the case of (*T.K. Gopal @ Gopi C v. State Of Karnataka*, 2000), the court recommended a rehabilitative strategy while managing prisoner-criminal dispositions.

Restorative Justice, a transformative approach, involves a facilitator helping the victim and perpetrator reach a conclusion (Singla, 2012). The UN Economic and Social Council has accepted basic principles for using Restorative Justice Programs in penal subjects, establishing the prison criteria for restorative Justice including Victim-Offender Mediation (VMO), a powerful tool that addresses victims' demands and holds criminals accountable. In (*Rahmath Nisha v. The Additional Director General of Prison*, 2019), the court held that prisoners' privacy and dignity must be protected. The right to a clean environment and safe drinking water is laid out in Article 21 of the Indian Constitution (Pandey, 2021). There is a dearth of understanding of restorative justice programs among the prison officials and prisoners. Through the lens of restorative justice, it aims to reimagine the rights afforded to women in Indian prisons (D. S. Khan, 2021).

### **Right to Life**

*Is it more to live in dignified circumstances or to merely breathe?* The burden of interpreting the phrase "existence" in Article 21 has been shifted to the court by the legislators. As a result, firm insights are periodically considered, and the scope of Article 21 continues to expand (DHNS, 2023). In the landmark decision of (*Kharak Singh v. The State of U. P. & Others*, 1962) the judiciary recognized, that human life embodies a significance that surpasses mere animal existence. The prohibition against its removal encompasses the majority of these boundaries and institutions necessary to enjoy life (Pathak, 2023). The availability also forbids any form of physical disfigurement, including but not limited to

amputation of a limb, the removal of an eye, or the destruction of any other organ of the body that the soul uses to communicate with the outside world, by "liberty," however, we mean more than just freedom from physical constraint or a prison cell" (Banerjee, 2024).

Justice P.N. Bhagwati held—"It is the essential right of everybody in this country to live with human dignity unfastened from exploitation."—in the seminal case of (*Maneka Gandhi v. Union Of India*, 1978) and subsequently in the landmark case of (*Bandhua Mukti Morcha v. Union Of India & Others*, 1983). The right to live in dignity, as stated in Article 21, is based on the Directive principles of state policy, particularly clauses (e) and (f) of Article 39 and Articles 41 and 42.

### **Right to Personal Liberty**

According to the Supreme Court of India, personal freedom encircles more than just the absence of physical constraints; it extends to all aspects of existence including the freedom of thought, choice, and religion (Nayar & Kumar, 2024). The concept of privacy was considered a right in India in the case of (*M. P. Sharma and Others v. Satish Chandra*, 1954). Justice Subba Rao, cited in the case of (*Kharak Singh*) that established the right to privacy as a fundamental right: "*The right to non-public liberty takes in now not merely a right to be free from regulations positioned on his moves but also free from encroachments on his non-public existence.*"

### **Requirement-Based System**

The state can only infringe upon an individual's right to life and personal liberty through the legislative process, i.e., on justifiable grounds. This may be best illustrated by the use of the death penalty in the most heinous of crimes. "The legal process for depriving an individual of their life and personal liberty must be "*just, proper, and accurate,*" rather than "*arbitrary, whimsical, and oppressive.*" The right to life and personal liberty, guaranteed by law, are violated in the postponement of executions and trials (Kumudha, 2015).

### **Protocol behind Detention of Women**

The Criminal Procedure Code (Cr.P.C.) delineates specific regulations for the arrest of women, such as the prohibition of arresting women between sunset and sunrise without prior sanction and the restriction of searches to decency (Kadam, 2020). The detaining officer is crucial in mitigating stigma and should refrain from donning their uniform. It is imperative to safeguard the offspring of the woman. Phone connections should be established, and their consulates or embassies should be informed of their detention status. Interpreters,

videoconferencing, and food supplies should be available to prisoners from other countries to meet their nutritional requirements (Umar, 2023). Without consulting consular officials, children whose mothers are citizens of different countries should not be removed from custody. The academic history and aptitude of the prisoner determine the educational institutes listed in the national prison manual (Bhatt & Bahuguna, 2019). Juvenile offenders between 18 and 21 must attend school and have access to study materials and literature.

### **The Buzz of Women inside Prisons**

In India, incarcerated women face numerous human rights' breaches that flagrantly undermine their fundamental constitutional rights, making their plight a major cause for concern (Naik & Mall, 2019). Although Articles 21 (Right to Life and Personal Liberty) and 39(e) and (f) (protection against exploitation and provision for free legal assistance) provide constitutional guarantees, numerous female prisoners are subjected to harsh realities that blatantly erode these rights. Inadequate facilities, a severe issue in prisons, fail to accommodate the unique requirements of women, such as access to menstrual products, healthcare, and appropriate hygiene. The lack of adequate healthcare further exacerbates the suffering of women with chronic ailments or mental health issues (Chakravarty, 2024). The environment that violates the Constitution's principles of dignity and equitable treatment is compounded by overcrowded conditions and insufficient separation of pre-trial detainees from convicted individuals.

In addition, women prisoners frequently endure discrimination and abusive treatment from both their peers and prison personnel. The lack of gender-sensitive training among staff and the inadequacy of mechanisms for addressing grievances further violate their rights to dignity and protection from brutality (IGNOU, 2020). Substantial reforms are required to guarantee that the fundamental rights of women in prison are maintained and respected.

### **Thoughts Proposed**

The States must adhere to the National Prison Handbook 2016, that details the fundamental rights of women prisoners. The Mulla Committee called for the establishment of a national commission for prisons to serve as an essential governing body responsible for prison policy on a national level (Agrawal, 2023). To ensure these rules are followed, regular and comprehensive inspections of jails must be conducted. Improvements in clinical care, nutrition, and housing are necessary for a safe and healthy pregnancy and delivery during incarceration. The National Legal Service Authority focuses on enhancing prisoners' mental and physical health, with a particular emphasis on female convicts prioritizing the

establishment of educational institutions, the enhancement of living conditions, and the promotion of woman's awareness of their rights (Gupta, 2023). This includes criminal aid, early release for those awaiting trial, and after-care programs to help women reintegrate into society. Basic facilities, such as libraries and lecture halls, and a core team of highly educated academics should be present in every prison. In addition, every state should develop and implement a prison education policy (Das & Joshi, 2023). Involvement of prisoners in training sports is another productive strategy for maintaining prison order. While visiting prisons, representatives from the National Human Rights Commission found that some female prisoners do not have the opportunity to complete elementary education. Entering more advanced degrees in school is a nearly non-existent reality. There is a lack of library resources for prisoners throughout the correctional facilities (Rashmi & Ramesh, 2016). To successfully reintegrate into society upon release, education is essential for women as all prisons must offer learning resources to detainees.

#### **Possible Solutions to the Women behind Bars**

To guarantee that prisons are not sequestered and that public figures are engaged in constructive public discernment, it is essential to conduct thorough and regular prisoner inspections (Kaushik & Sharma, 2009). District Judges must conduct monthly visits to each institution under their jurisdiction, as mentioned in the National Jail Manual.

To resolve the distinctive concerns of women prisoners, the Legislative Assembly, State Human Rights Commission, and social workers must conduct at least one monthly visit to prisons (Ganguly & Jangra, 2023). The State Legal Services Authority, State Commission for Women, State Human Rights Commission, District Magistrate, District Sessions Judge, State Department of Women and Child Development/Social Welfare, and the Board of Site Visitors must be informed of inspection visits conducted by organizations such as DLSAs, the State Commission for Women, and others. In July 1986, the All-India Organization on Prison Administration, better known as the Kapoor Committee was established to study and evaluate various facets of jail management and control, especially in the matter of discipline and safety, and to suggest ways to enhance these areas (Parveen, 2018). A long list of safety measures, including elevated communication towers, wire fences, steel detectors, canine squads, and higher-up perimeter walls, were suggested by the Committee (Kaushik & Sharma, 2009). It also meant using Closed-Circuit Televisions (CCTVs) to monitor athletic events in certain areas, such as the vicinity of the main gate, the perimeter wall, and rooftops. In 1983, the Committee, headed by Justice A. N. Mulla, produced a



report with 658 recommendations, 35 related explicitly to female convicts. Subsequently, in 1987, under the leadership of Justice Krishna Iyer, a nationwide expert committee on women prisoners assessed the plight of women prisoners and offered several recommendations including:

- The prisoners, especially women, should know their legal rights.
- Female police officers are allowed to search female prisoners.
- Female doctors should examine women in prison.
- Female convicts must be able to contact their relatives, lawyers, social workers, and religious groups.
- Female prisons should be established.
- Female prisoners need special prosecutors.

### **Knowledge, Abilities, and Career Guidance**

To reform prisoners, it is essential to ensure they get vocational training and skill development programs (Sonowal, 2021). A Board for Skill Development and Vocational Education should be set up under the Inspector General of Police, and each state should pay for these programs transparently.

### **Free Legal Aid**

To guarantee justice for all, Article 39A of the Indian Constitution provides free legal assistance to the impoverished and vulnerable members of society. Ensuring equality before regulation and a legal system that promotes justice based on the principle of equal opportunity of law is mandatory for the state according to Articles 14 and 22(1) of the Constitution (Aryan, 2020).

According to Justice A. N. Mulla Committee, prisoners are entitled to several benefits:

- The right to review or appeal one's sentencing or conviction;
- The right to consult or be represented by a lawyer of one's choice.
- Access to legal services authorities such as State Legal Service Boards;
- Notification of legal right to appeal, revision, or review;
- Access to all court papers needed to appeal, revise, or review sentence or conviction;
- The opportunity to appropriately communicate prison-related problems and complaints to the proper authorities;
- Prisoners can contact the prison administration, competent government, or judicial authorities to resolve rights or grievances.

### **Conclusion**

The percentage of women prisoners in India's prisons is rapidly increasing. Several women in jail await trial and confront several obstacles while behind bars. Not all prisons adhere to the modern regulations meant to protect and treat prisoners fairly, especially women. Issues that women face encompass a lack of female staff, cramped and unclean housing, inadequate hygiene and sanitation practices, insufficient resources to address their emotional and physical well-being, vitamin deficiencies, educational barriers, and practical skills that are frequently rendered useless.

In addition to these challenges, women in prison additionally encounter a high prevalence of violence from both the government and their fellow inmates, a scarcity of criminal resources, and limited access to the outside world. Prison administrators and other personnel who interact with female detainees should undergo gender-sensitive training to improve their decision-making when dealing with these women. They should also be mindful of the requirements of women who are foreign nationals, members of minority groups, or who have impairments to prevent prejudice of any kind. A natural and effective system of criticism redressal needs to be established to address prisoner rights breaches and provide inmates with a means of communicating with the administration. Improving jail conditions, bolstering post-release support, and—most importantly—keeping women out of formal prison systems for as long as possible are all viable solutions to the problem of women criminal behaviour in India.

### References

- Aggarwal, A. (2022). Rights of Women Prisoner in India. *International Journal of Law Management & Humanities*, 5(1), 2067.
- Agrawal, A. (2023, November 9). Rights of Prisoners in India. *LawBhoomi*. <https://lawbhoomi.com/rights-of-prisoners-in-india/>
- Anand, H. (2021). Rights of Women Prisoners in India: A Legal Analysis. 2021.
- Aryan, V. (2020, July 15). *Upholding the Human Rights of Prisoners, including Women Prisoners and Offenders*. <https://pmindiaun.gov.in/pageinfo/MjI2Ng,,>
- Bandhua Mukti Morcha v. Union Of India & Others (Supreme Court of India December 16, 1983). <https://indiankanoon.org/doc/595099/>
- Banerjee, S. (2024). *THE TORMENTING PLIGHT OF WOMEN INMATES IN INDIA: AN INDEPTH STUDY*. 11(2).
- Bhatt, M., & Bahuguna, D. R. (2019). *Rights of Prisoners from Human Rights Perspectives: A Select Study of Women Prisoners in India*. 8, 113–121. <https://doi.org/10.14419/ijet.v8i1.10.28317>
- Chakravarty, B. (2024). *Women in Detention and Access to Justice*. <https://prsindia.org/policy/report-summaries/women-in-detention-and-access-to-justice>
- Das, P. K., & Joshi, K. (2023, December 14). *Mothers and children in prison: NGOs help, but better implementation of policies needed – The Leaflet* [Online

- post]. <https://theleaflet.in/mothers-and-children-in-prison-ngos-help-but-better-implementation-of-policies-needed/>
- DHNS. (2023, September 20). Women prisoners must be treated better. *Deccan Herald*. <https://www.deccanherald.com/opinion/editorial/women-prisoners-must-be-treated-better-2692960>
- Fathima, A. (2017). Rights of women prisoners in India. *International Journal of Academic Research and Development*.
- Ganguly, S., & Jangra, J. (2023, March 12). *Incarcerated and Invisibilized: The Female Prisoners of India - THE DIALOGUE BOX*. <https://thediologuebox.com/female-prisoners-india/>
- Gupta, R. (2023). *LEGAL RIGHTS OF FEMALE PRISONERS -DETAILED ANALYSIS OF PRISON LAWS IN INDIA AND ALL OTHER SPECIAL PROVISIONS*. 2(3).
- IGNOU. (2020). *Rights of prisoners* (pp. 33–43).
- Kadam, S. (2020, September 10). How India treats women in prisons. *CJP*. <https://cjp.org.in/how-india-treats-women-in-prisons/>
- Kasera, P. (2020). *Rights of Women Prisoners in India* (SSRN Scholarly Paper 3621467). <https://doi.org/10.2139/ssrn.3621467>
- Kaushik, A., & Sharma, K. (2009). Human Rights of Women Prisoners in India. *Indian Journal of Gender Studies*, 16(2), 253–271.
- Khan, D. S. (2021). *State of Women Prisoners in India: Human Rights Violation and Judicial Response*.
- Khan, S. (2023). Rights of Women Prisoners in India: Nexus Between the Pervasive Impact of Patriarchy and the Problem of Women Prisoners. *International Journal of Research Publication and Reviews*, 4(7), 1191–1197. <https://doi.org/10.55248/gengpi.4.723.48950>
- Kharak Singh v. The State Of U. P. & Others (Supreme Court of India December 18, 1962). <https://indiankanoon.org/doc/619152/>
- Kumar, V. (2023, February 25). *Rights of Women Detainees Under Indian Judicial System* ». <https://www.lawaudience.com/rights-of-women-detainees-under-indian-judicial-system/>
- Kumudha, R. (2015). *CUSTODY OF WOMEN PRISONERS IN INDIA*. 5(12).
- M. P. Sharma And Others v. Satish Chandra (Supreme Court of India March 15, 1954). <https://indiankanoon.org/doc/1306519/>
- Maneka Gandhi v. Union Of India (Supreme Court of India January 25, 1978). <https://indiankanoon.org/doc/1766147/>
- Maniyar, Z. (2022, October 5). *Are women entitled to special provisions in prison?* CJP. <https://cjp.org.in/are-women-entitled-to-special-provisions-in-prison/>
- Mohanty, M. (2013). Behavioural Syndrome of Women Prisoners in India. *The Indian Journal of Political Science*, 74(4), 639–648.
- Mondal, P., & Srivasthava, A. (2023, July 10). *Prison Administration And Rights Of Women Prisoners In India*. IJLLR. <https://www.ijllr.com/post/prison-administration-and-rights-of-women-prisoners-in-india>
- Mordhwaj. (2021, September 6). *RIGHTS AND CONDITIONS OF UNDERTRIAL WOMEN AND THEIR CHILDREN IN INDIA – Rashtriya Raksha University*. <https://rru.ac.in/rights-and-conditions-of-undertrial-women-and-their-children-in-india/>

- Naik, D. K. R., & Mall, A. (2019). *WOMEN IN PRISONS INDIA*. 6(2).
- Nayar, P. P., & Kumar, D. R. (2024). *The Rights of Women Prisoners in India*. 13(1).
- NCPCR. (2021). *EDUCATION STATUS OF CHILDREN OF WOMEN PRISONERS IN INDIA*.
- NHRC. (2021). *Rights of Prisoners*. NHRC.
- NLSA. (2018). *A campaign for enhancing Legal Services to Women inmates and their accompanying children in prisons*.
- OHCHR. (2010). *United Nations Rules for the Treatment of Women Prisoners and Non-custodial Measures for Women Offenders (the Bangkok Rules)*. OHCHR. <https://www.ohchr.org/en/instruments-mechanisms/instruments/united-nations-rules-treatment-women-prisoners-and-non-custodial>
- Pandey, D. (2021). *FEMALE PRISONERS IN INDIA: THE CONSEQUENCES OF TRIPLE MARGINALISATION*.
- Parveen, D. S. (2018). *Sponsored by National Commission of Women New Delhi*.
- Pathak, A. (2023, December 23). *HUMAN RIGHTS OF FEMALE PRISONERS IN INDIA*. Jus Scriptum. <https://www.jusscriptumlaw.com/post/human-rights-of-female-prisoners-in-india>
- Prakash, B. (2022). *Challenges faced by Women Prisoners in India, in Contradiction to Article 21*. <https://doi.org/10.13140/RG.2.2.18849.07522>
- Rahmath Nisha v. The Additional Director General of Prison (Madras High Court May 28, 2019). <https://indiankanoon.org/doc/85469485/>
- Rashmi, G. & Ramesh. (2016). Violation of human rights of women prisoners in Indian: A critical analysis. *International Journal of Sociology, Social Anthropology and Social Policy*, 2(1), 45. <https://doi.org/10.5958/2454-4833.2016.00005.X>
- R.D. Upadhyaya v. State of Andhra Pradesh & Ors (Civil Writ Petition No. 559 of 1994), WRIT PETITION (C) NO. 559 OF 1994 (THE SUPREME COURT OF INDIA May 15, 2006).
- Sharma, D., & Gaur, B. (2021). *Women Prisoner's Rights in India: A Myth or Reality*. 8(7).
- Singla, N. (2012). *RIGHTS OF WOMEN PRISONERS IN INDIA: AN EVALUATION*. 1(2).
- Sonowal, P. (2021, May 25). *Status of Women Prisoners in India—Welcome to Blogs Page an unique information section of Alliance University*. <https://blog.alliance.edu.in/status-of-women-prisoners-in-india/>
- Sunil Batra vs Delhi Administration on 20 December, 1979 (Supreme Court of India December 20, 1979). <https://indiankanoon.org/doc/778810/>
- T.K. Gopal @ Gopi C v. State Of Karnataka (Supreme Court of India May 5, 2000). <https://indiankanoon.org/doc/376047/>
- Tuka Ram And Anr v. State of Maharashtra (Supreme Court of India September 15, 1978). <https://indiankanoon.org/doc/1092711/>
- Umar, Md. T. (2023). *A PREDICAMENT OF WOMEN UNDER-TRIAL PRISONERS AND ITS IMPACT ON THEIR BASIC HUMAN RIGHTS*.
- Vardhan, H. (2020). *Human Rights and Women Prisoners in India: With Emphasis on their Living Condition Issues*.