

Human Rights and Criminal Justice: A Study of Female Prisoners in Manipur

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Abstract

Within the complex framework of India's criminal justice system, the recognition and protection of the rights of female prisoners represent an important measure of the nation's commitment to justice, equality, human dignity and the rule of law. The administration of criminal justice encompasses a wide range of processes, including investigation, prosecution, adjudication and execution of sentences. In this broader framework, examining the rights and living conditions of women prisoners provides an important means of assessing the effectiveness of the criminal justice system and the extent to which individual freedoms and human dignity are protected. The Constitution of India provides several safeguards for the protection of fundamental and human rights, while the Supreme Court of India, through various landmark judgments, has repeatedly emphasized that prisoners do not lose their fundamental rights merely because they have been incarcerated. Nevertheless, reports, empirical studies, scholarly literature and findings of human rights organizations have consistently highlighted instances of ill-treatment, inadequate prison conditions and violations of prisoners' fundamental rights. These concerns assume particular significance in the case of women prisoners, who often face vulnerabilities arising from their social, psychological, physical and economic circumstances. Manipur, a state situated in the north-eastern region of India, occupies a distinctive position within the country because of its rich cultural heritage, historical development and complex socio-political environment. Its transition from an independent kingdom to a constituent state of the Indian Union has influenced the evolution of its administrative, legal and institutional structures, including its criminal justice and correctional systems. Understanding the condition of women prisoners in Manipur therefore requires consideration not only of the formal legal framework but also of the social and institutional circumstances within which the prison system operates. Women have historically constituted one of the most vulnerable and marginalized sections of society, and imprisonment can intensify these vulnerabilities. According to recent prison statistics reported by the National Crime Records Bureau (NCRB), India's prison population exceeds the sanctioned capacity of its correctional institutions, with women accounting for only a small proportion of the total prison population. Despite their relatively smaller numbers, female prisoners often experience imprisonment in distinct and, in many respects, more challenging ways than their male counterparts. In Manipur, available official data similarly indicate that women constitute a small proportion of the prison population, with a substantial majority reportedly being undertrial prisoners. The difficulties encountered by women in prison extend beyond the deprivation of physical liberty. They may include inadequate access to healthcare, sanitation, nutrition, legal assistance, psychological support, education, rehabilitation and contact with family members. These challenges can be particularly severe for women who are pregnant, mothers of young children, elderly, economically disadvantaged or

otherwise socially vulnerable. The presence of children accompanying incarcerated mothers further creates complex concerns relating to childcare, nutrition, education and the overall development and well-being of the child. Human rights are universal and inherent to all individuals, irrespective of their nationality, place of residence, gender, religion, language, social status or other circumstances. Imprisonment restricts an individual's liberty as a consequence of the criminal justice process, but it does not extinguish the person's humanity or eliminate the basic rights associated with human dignity. A person accused or convicted of an offence does not, merely by entering prison, cease to be a human being. Consequently, deprivation of liberty must not be accompanied by unnecessary, arbitrary or degrading restrictions on those rights that continue to be available to prisoners under law. Against this background, the present study seeks to examine the relationship between the criminal justice system and the rights of female prisoners in the state of Manipur. It focuses on the functioning of the prison system, the level of awareness among women prisoners regarding their legal and human rights, and the nature and extent of perceived or reported violations of those rights. The study also seeks to identify gaps between the rights guaranteed under constitutional, statutory and judicial frameworks and their actual implementation within the prison system. The issue of human rights violations involving women prisoners requires sustained attention because the deprivation of liberty should never result in the deprivation of human dignity. Examining the conditions experienced by female prisoners in Manipur can therefore contribute to a better understanding of the challenges confronting the prison administration and may help identify measures for improving the protection of prisoners' rights. Such an examination is particularly relevant in the context of a correctional system that is expected to uphold justice while simultaneously promoting rehabilitation, dignity and social reintegration.

Introduction

This article examines the relationship between the functioning of India's criminal justice system and the protection of the rights of women prisoners in Manipur. Although the Constitution of India, judicial decisions, and other legal measures contain important safeguards for prisoners, reports, academic studies, human-rights organizations, and field-based research have continued to document instances of ill-treatment and infringement of prisoners' fundamental rights. These concerns make it important to examine the functioning of the prison system, the level of awareness among inmates regarding their rights, and the nature of rights violations in the Central Jail of Manipur. Inadequate implementation of existing legal safeguards can leave incarcerated women exposed to a range of social, legal, health, and welfare-related difficulties. The present study therefore focuses on the rights of women prisoners and the challenges experienced by them in prisons in Manipur.

Objective

The study addresses the major concerns surrounding the rights and welfare of women in custody and considers how the criminal justice system can uphold fairness and equality for this particularly vulnerable population. It examines the protection of women prisoners at different stages of the criminal justice process, including investigation, trial, and sentencing. The analysis seeks to highlight efforts aimed at making justice more accessible and equitable, especially for individuals who are socially and economically marginalized. It also reviews the legislative framework and judicial safeguards available to incarcerated women, considers their distinct needs, and identifies areas where the system can be strengthened to make prison administration more humane and responsive. More specifically, the study

seeks to assess the functioning of, and awareness regarding, prisoners' rights in the Central Jail of Manipur and to identify the principal forms of human-rights violations occurring within the prison environment.

Method

The study adopts both qualitative and quantitative approaches and examines the complex association between patriarchy and the experiences of women prisoners. Rather than treating this relationship as a simple cause-and-effect phenomenon, the analysis considers the broader structural factors affecting incarcerated women. A critical review of constitutional provisions, criminal legislation, prison manuals, judicial decisions, earlier research, relevant databases, websites of important Indian institutions along with societal approach was undertaken to understand the extent to which the legal and institutional framework addresses patriarchal disadvantages experienced by women prisoners in Manipur. A simple random sampling approach was also used for data collection, with the information subsequently organized and documented for analysis.

Meaning and Explanation of Prison and Prisoners

The Merriam-Webster Dictionary describes a prison as a condition or place of confinement, particularly institutions in which people accused or convicted of serious offences are detained.¹ Under Section 3 of the Prisons Act, 1894, the term prison broadly refers to a jail or other place used, either permanently or temporarily, under the authority of a State Government for the detention of prisoners, together with the land and buildings associated with it. The statutory definition excludes certain locations, including places where people are held exclusively in police custody, places specifically designated by the State Government under the relevant criminal-procedure provisions, and places declared by the State Government to be subsidiary jails.²

India's prison system consists of different categories of institutions administered by the State or Central authorities. The principal categories include the following:³

1. Central Jail: The criteria for designating a prison as a Central Jail differ among States. In general, however, Central Jails accommodate prisoners serving relatively long sentences, often exceeding two years, and normally have greater capacity and more extensive correctional or rehabilitation facilities than smaller prisons.
2. District Jail: District Jails function as the principal correctional institutions in States or Union Territories where a Central Jail is not available.
3. Sub-jail: These are comparatively small prison institutions generally located at the sub-divisional level.
4. Women's Jail: These institutions are established specifically for the detention of women prisoners and are generally staffed predominantly by women personnel.
5. Borstal School: Borstal institutions are intended for juveniles and are designed to provide care, education, vocational training, and rehabilitation in an environment suited to young offenders. Their emphasis is on education, constructive training, moral development, and reform rather than exposure to the adverse influences associated with conventional prisons.
6. Open Jail: Open prisons are minimum-security institutions in which prisoners who demonstrate good conduct and satisfy the prescribed eligibility requirements may be accommodated. Inmates may undertake activities such as agriculture as part of their rehabilitation and work programs.

7. **Special Jail:** Special Jails are high-security institutions intended for particular categories of offenders who require specialized custodial arrangements, including persons convicted of terrorism, insurgency, or serious violent offences. They may also accommodate prisoners who have committed serious breaches of prison discipline, display violent or aggressive tendencies, are difficult cases among habitual offenders, or belong to professional or organized criminal groups.

Prison inmates in India are generally classified as convicts, under-trial prisoners, and detainees. A convict is an individual who has been found guilty by a competent court and is serving a sentence of imprisonment. An under-trial prisoner is a person whose criminal case is still pending before a court and whose guilt has not yet been finally determined. A detainee is a person who is being held in custody under the applicable legal authority.

Prisons in Manipur

Manipur has two principal prisons identified as Manipur Central Jail, Imphal, and Manipur Central Jail, Sajiwa. District jails are also located in Churachandpur and Chandel, although the article records both as non-functional. In the context of the continuing ethnic conflict in the State, the Government of Manipur established a functional temporary prison in Churachandpur district. Women prisoners are accommodated in the women's section of the Imphal Detention Centre (Central Jail), situated at Old Lambulane, Imphal.

Based on the official inspection by the Manipur State Commission for Women (MSCW)⁴, together with the data collected through field research in the study⁵, the women's section of Manipur Central Jail reportedly housed 40 women inmates during 2025–26. The adjoining Women Foreigners Detention Centre reportedly accommodated 16 detainees. Approximately 97% of the incarcerated women were described as under-trial prisoners awaiting legal resolution, rather than convicted inmates. Women were reported to constitute about 3% of the overall prison population in Manipur. There are approximately 70% of the female inmates who belonged to Scheduled Tribe communities. Around 30% were reported to have low levels of literacy, while approximately 35% had earned less than ₹5,000 per month before their arrest.

Most of the women inmates suffer from mental-health related issues, about half of them suffers from depression, anxiety, and post-traumatic stress disorder (PTSD)⁶. Some of them were also reported to have chronic gastrointestinal problems, which are associated with difficulties relating to food and sanitation within the facilities.

Plight of Women Prisoners in Manipur

Women prisoners in Manipur experience a range of systemic difficulties, with inadequate legal assistance and socio-economic vulnerability emerging as major concerns. The principal issues identified in the study are discussed below.

1. **Under-trial crisis:** A large proportion of women inmates have not been convicted of an offence. Prolonged delays in investigation and adjudication can therefore result in extended periods of pre-trial detention. Such delays can have serious consequences for women's family life, employment, finances, and social well-being even before a court reaches a final decision.
2. **Infrastructure and isolation:** The prison system is reported to face shortages of women officers and custodial staff. Inadequate infrastructure and limited modern facilities constitute significant

challenges for effective correctional administration and for meeting the specific needs of female inmates.

3. Health and hygiene: Mental-health concerns represent an important component of the health needs of incarcerated women. The study therefore emphasizes the need for accessible counselling services, psychological support, and appropriate psychiatric care, along with adequate attention to general health and hygiene.
4. Mothers and children in prison: Some incarcerated women are young mothers with dependent children. Children who remain with their mothers in prison may experience deficiencies in nutrition, education, recreation, and childcare facilities. Weak implementation of welfare measures can consequently expose children to hardships despite the fact that they have not themselves been accused or convicted of an offence.
5. Disproportionate involvement under the NDPS Act: A high proportion of women prisoners are being detained in cases under the Narcotic Drugs and Psychotropic Substances Act. Many of these women may occupy low-level roles, such as couriers, and that poverty and structural disadvantage can contribute to their involvement in drug-related offences. This raises questions about proportionality, socio-economic vulnerability, and the circumstances surrounding women's participation in illicit drug networks.
6. Women foreign detainees: The Women Foreigners Detention Centre in Imphal reportedly accommodates a substantial number of Myanmar nationals who entered India in circumstances associated with political instability, conflict, lack of documentation, or informal and illegal cross-border trade. Some detainees remain in custody even after completing their court-imposed sentences or paying fines because repatriation procedures and bilateral administrative processes between India and Myanmar may take considerable time. This can leave women in prolonged legal and administrative uncertainty. It is to be noted that, although the facility is administered by the State Social Welfare Department, a distinct operational framework has historically been lacking, resulting in the application of restrictive security practices similar to those used for ordinary convicted prisoners. It also reports that, following outbreaks of ethnic violence in Manipur, telephone and digital communication facilities for foreign detainees were restricted on security grounds.⁷

Legal Safeguards for Prisoners

The Constitution of India does not prescribe a separate, comprehensive constitutional code exclusively for women prisoners. Nevertheless, constitutional guarantees apply to persons in custody and provide an important basis for protecting their equality, dignity, liberty, and access to justice. Articles 14, 15(3), 21, 22, and 39-A are particularly relevant to the protection of women, arrested persons, and prisoners.⁸

Article 14 establishes equality before the law and equal protection of the laws, while Article 15 prohibits discrimination on specified grounds and, through Article 15(3), permits the State to make special provisions for women. This provision creates a constitutional basis for measures designed to address the distinct needs of women prisoners. Article 21 protects life and personal liberty and has been judicially interpreted to include the right to live with human dignity and to require lawful and fair procedures when liberty is restricted. These guarantees therefore operate as safeguards against arbitrary detention, degrading treatment, and other forms of custodial abuse. Article 39-A further reflects the State's responsibility to promote equal access to justice and free legal aid for persons who cannot otherwise secure legal representation.⁹

The State consequently has a responsibility to ensure that women in custody are not subjected to discriminatory treatment and that they receive appropriate accommodation, healthcare, safety, and protection from abuse and violence. The special circumstances and requirements of women prisoners must be taken into account in prison administration.¹⁰ In *Sheela Barse v. State of Maharashtra*¹¹, the Supreme Court emphasized protections for women prisoners and reinforced the application of Article 21 to custodial conditions.

The Protection of Human Rights Act 1993 established the National Human Rights Commission (NHRC) as a statutory institution responsible for the promotion and protection of human rights. The NHRC has an important role in examining complaints, monitoring conditions, and drawing attention to human-rights concerns affecting prisoners, including women prisoners.¹² The Commission has issued directions and recommendations to prison authorities, High Courts, and State Governments concerning prison reform. These have included attention to the treatment of persons with mental illness, speedy disposal of under-trial cases, regular judicial inspections of prisons, and compulsory health screening of prisoners with periodic reporting.¹³

The National Commission for Women (NCW), established in 1992, is another statutory institution concerned with reviewing constitutional and legal safeguards for women and recommending measures for their improvement. Its work has included examination of the circumstances of women prisoners. Major human-rights concerns highlighted by the Commission are structural discrimination, and infrastructural deficiencies affecting women inmates and has proposed measures for improving their conditions.¹⁴

In *R.D. Upadhyay v. State of Andhra Pradesh & Ors.*,¹⁵ the Supreme Court issued directions concerning children up to six years of age who remain in prison with their incarcerated mothers. The directions addressed matters including food, shelter, healthcare, and other essential support, thereby recognizing that children accompanying their mothers in prison require protection and welfare measures despite not being prisoners themselves.

India's New Criminal Laws

The Bharatiya Nyaya Sanhita (BNS), 2023, Bharatiya Nagarik Suraksha Sanhita (BNSS), 2023, and Bharatiya Sakshya Adhiniyam (BSA), 2023 represent a major restructuring of India's criminal-law framework. The new laws replace the Indian Penal Code, Code of Criminal Procedure, and Indian Evidence Act respectively. Among other changes, BNS introduce revised provisions concerning offences by introducing more stringent penalties.¹⁶ BNSS has altered procedural mechanisms around arrest, timeline for investigation, evidence, and protections relevant to women and other vulnerable persons.¹⁷

The following are the key safeguards under BNSS:

1. Section 43(5) of the BNSS generally restricts the arrest of a woman between sunset and sunrise.
2. In exceptional circumstances requiring arrest during those hours, the prescribed procedure includes action by a woman police officer and obtaining permission from a Judicial Magistrate of the First Class.
3. The arrest procedure contains safeguards concerning physical contact between male police officers and women, with limited exceptions and provisions intended to permit submission to custody through verbal communication in appropriate circumstances.

4. Women, together with certain other vulnerable categories identified by law, may be exempted from compulsory attendance at a police station for specified inquiries or investigations, allowing questioning or assistance to be undertaken at their residence where the statutory conditions are satisfied.
5. Search of an arrested woman must be conducted by another woman, with due regard to privacy, dignity, and decency.
6. Section 53 of the BNSS provides safeguards concerning the medical examination of an arrested woman, including examination by, or under the supervision of, a female registered medical practitioner.
7. Women detainees must be kept separately from male detainees in appropriate lockups or enclosures so as to protect their physical safety, privacy, and dignity.

The judgment in *D.K. Basu v. State of West Bengal*¹⁸ established important procedural requirements relating to arrest and detention, including documentation of arrest and medical examination, thereby strengthening safeguards against custodial abuse.

International Guidelines Towards the Protection of Women Prisoners

International human-rights instruments and prison standards provide an additional framework for protecting women in custody. These instruments emphasize dignity, equality, non-discrimination, gender-sensitive treatment, healthcare, family relationships, and rehabilitation. The principal instruments discussed in the article include the following.

1. Universal Declaration of Human Rights (UDHR): The UDHR provides a broad international statement of fundamental human rights and freedoms applicable to all persons. It recognizes principles of equality, liberty, dignity, and protection from inhuman treatment, together with civil, political, economic, social, and cultural rights. The article notes its significant influence on the development of constitutional and human-rights principles.¹⁹
2. United Nations Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders (Bangkok Rules): Adopted by the United Nations General Assembly in 2010, these rules provide gender-responsive standards for women in the criminal justice system. They address areas such as healthcare, family contact, rehabilitation, and the use of non-custodial measures, while recognizing the circumstances and vulnerabilities of women offenders and prisoners.²⁰
3. United Nations Standard Minimum Rules for the Treatment of Prisoners (Nelson Mandela Rules): Revised in 2015, these standards establish internationally recognized principles for humane prison administration. They include provisions relevant to women prisoners, gender-sensitive staffing, healthcare, and the needs of pregnant women and mothers.²¹
4. Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW): CEDAW seeks to eliminate discrimination against women and requires States to pursue substantive equality and protection from discrimination. Its principles are relevant to ensuring that women prisoners receive safe, dignified, and non-discriminatory treatment while in custody.²²

Taken together, these international standards emphasize that imprisonment must not result in the denial of basic human dignity. They encourage gender-sensitive prison policies and practices that respond to women's healthcare, safety, family, maternity, and rehabilitation needs. They also provide a framework

that governments and correctional institutions can use when developing policies intended to protect the rights and welfare of women prisoners.

The Prisons Act, 1894

The Prisons Act, 1894 is an important piece of legislation in the history of prison administration in India. Enacted on 22 March 1894, it has traditionally provided a legal framework for the administration and management of prisons²³. The legislation contains provisions relevant to the treatment and custody of prisoners, including safeguards concerning the separation of women from men²⁴, medical examination of women prisoners by female medical officers²⁵, and suitable forms of employment for women prisoners during the daytime²⁶.

Model Prisons and Correctional Services Act, 2023

The Model Prisons and Correctional Services Act 2023 was introduced by the Ministry of Home Affairs with the objective of providing a contemporary framework for the safe custody, correction, reformation, and rehabilitation of prisoners and for the administration of prison and correctional services by States and Union Territories. It was intended as a model framework to replace the older prison-law approach represented by the Prisons Act, 1894.²⁷

The model legislation places particular emphasis on appropriate accommodation for women prisoners and recognizes their distinct vulnerabilities and the needs of children who remain with them. It envisages dedicated arrangements that protect women's safety, privacy, and welfare and provides for healthcare, education, and recreational facilities for children accompanying incarcerated mothers.²⁸

Progressive Approaches of the Indian Judiciary

The Supreme Court of India has played an important role in interpreting constitutional guarantees and developing safeguards for prisoners, including women prisoners. Through its judgments and directions, the Court has addressed custodial conditions, access to healthcare and basic necessities²⁹. Furthermore, the court has also recognized rights like free legal assistance and representation, family relationships, and protection against abuse and discriminatory treatment.³⁰

Judicial intervention has also been supported by the Court's authority to require compliance with its directions. The article identifies a number of significant decisions. In *Sunil Batra v. Delhi Administration*,³² the Court recognized that imprisonment does not extinguish the fundamental rights of prisoners and emphasized humane treatment, basic amenities, medical care, and protection against custodial abuse. In *Prem Shankar Shukla v. Delhi Administration*,³³ the Court considered prisoners' rights in relation to maintaining human dignity and family relationships. *Hussainara Khatoon v. State of Bihar*³⁴ is particularly important for the recognition of the right to speedy trial and legal assistance for indigent accused persons, including women prisoners who cannot otherwise secure adequate representation.

These judicial developments have contributed substantially to strengthening constitutional protection for prisoners. They have also helped to challenge discriminatory practices and promote the broader principles of equality, dignity, and humane treatment within India's criminal justice system.

Suggestions and Conclusion

The criminal justice and prison systems need to adopt policies that are genuinely responsive to the dis-

inct circumstances of women prisoners. Adequate healthcare, sanitation, nutrition, and hygienic living conditions should be treated as essential components of custodial care. Particular attention is also required for pregnancy, motherhood, menstrual health, childcare, and the welfare of children who remain with their mothers in prison.

Legal-awareness programmes should be strengthened so that incarcerated women understand their rights, available remedies, bail provisions, legal-aid mechanisms, and relevant prison procedures. Awareness can improve women's ability to seek assistance and participate meaningfully in their own legal proceedings. At the same time, timely and effective legal representation should be made available to women who lack the financial means to obtain it.

Rehabilitation and social reintegration should form an integral part of prison administration. Programmes involving education, vocational and occupational skills, psychological support, and preparation for release can help women rebuild their lives after incarceration and may reduce the risk of reoffending. Such measures should be designed around the specific social and economic circumstances of female inmates rather than applying a uniform model of rehabilitation.

Prisoners constitute one of the most vulnerable groups within society and are particularly dependent on public institutions for the protection of their basic rights. The prison system in Manipur therefore needs to evolve in a manner consistent with justice, equality, accountability, and human dignity. The continued detention of under-trial women even after bail has been granted, where release is prevented by an inability to furnish bail bonds, represents an important concern. Mechanisms that allow the State to assume financial responsibility in appropriate cases could help prevent unnecessary detention.

Similarly, unreasonable delays in the hearing of appeals filed by convicted women can prolong incarceration and undermine access to justice. These concerns require closer institutional monitoring and timely judicial intervention. More broadly, the criminal justice system should also examine the social conditions that may contribute to women's involvement in crime, including poverty, economic insecurity, discrimination, and structural disadvantages. Addressing these underlying factors, alongside fair and humane custodial practices, is essential for building a criminal justice system in which women are treated with dignity and are given a genuine opportunity for rehabilitation and reintegration into society.

References and Sources Cited in the Original Article

1. Merriam-Webster Dictionary, "Prison," accessed 14 September 2025.
2. The Prisons Act, 1894, s.3; Code of Criminal Procedure, 1973, s. 541 (now Bharatiya Nagarik Suraksha Sanhita, 2023, s.500).
3. Priya Rao, "Indian Prison System: Structure, Problem and Reforms," Journal of Humanities and Social Sciences, 2019; 10(1):189–192.
4. Available at <https://northeasttoday.in/northeast/legal-awareness-programme-held-for-women-inmates-central-jail/> accessed on 1st August 2026 .
5. NHRC. <https://nhrc.nic.in> accessed on 1st September 2026 & Field report data from Central Jail (Old Lambulane) on 7th September 2026
6. Research Gate- <https://www.researchgate.net> -Health Status of Incarcerated Women at Central Jail, Imphal -accessed on 20th August 2026.
7. Supra Note 5.
8. The Constitution of India, articles 14, 15(3), 21, 22 and 39-A.

9. https://www.indiacode.nic.in/bitstream/123456789/15240/1/Constitution-of-India_.pdf -accessed on 13th August 2026.
10. Ghia Unnati, "Affirmation Action Under Article 15(3): Reassessing the Meaning of 'Special Provisions' for Women," National Law School of India Review, Vol. 32, No. 2 (2020).
11. AIR 1983 SC 378.
12. Arun Ray, National Human Rights Commission of India: Formation, Functioning and Future Prospects, New Delhi: Khama Publisher, 2004.
13. <https://nhrc.nic.in/press-release/nhrc%E2%80%99s-initiatives-prison-reforms> accessed on 22nd November 2023.
14. <https://ruralindianonline.org/in/library/resource/a-report-on-improving-the-condition-of-women-inmates-in-prison/> accessed on 1st September 2026 ‘
15. (2006) 3 SCC 514.
16. LexisNexis , <https://www.lexisnexis.com> accessed on 31st August 2026.
17. Arrest of Women BNSS- by Saloni, <https://www.scribd.com/document/1024499936/Arrest-of-women-BNSS> by Saloni-accessed on 2nd September 2026.
18. (1997) 1 SCC 416.
19. United Nations, <https://www.un.org/en/about-us/universal-declaration-of-human-rights> -accessed on 10th October 2024
20. <https://www.hchr.org/en/instruments-mechanisms/instruments/united-nations-rules-treatment-women-prisoners-and-non-custodial> -accessed on 20th October 2025
21. <https://www.unodc.org/documents/justice-and-prison-reform/Nelson-Mandela-Rules-to-ebook.pdf> - accessed on 20th November 2025
22. <https://blog.ipleaders.in/convention-elimination-from-discrimination-women-cedaw-1979/> -accessed on 2nd September 2026
23. <https://indianKanoon.org/doc/626516/> accessed on 30th April 2026
24. s. 27, The Prisons Act 1894
25. s. 24, the Prison Act 1894
26. s. 59, The Prisons Act, 1894
27. Citizens For Justice and Peace/ CJP. <https://cjp.org-in> -accessed on 25th July 2026.
28. <https://www.dristiias.com> -accessed on 19th July 2026
29. S.K. Verma & Kusum, 'Fifty years of the Supreme Court of India: It's Grasp and Reach', New Delhi: Oxford University Press, 2000
30. V. Nivedha and Dr. Neelam Pandey, 'Problems of Women Prisoners and Role of Judiciary in Protecting the Rights of Prisoners', International Journal of Social Impact, Vol 2, No.1, Jan-March 2017
31. Pallathadka, Harikumar, 'Role Played by Indian Judiciary in Recognition, Promotion, And Protection of Rights of Prisoners in India', European Journal of Molecular & Clinical Medicine, Vol.7, No. 10, 202032. AIR (1978) 4 SCC 409.
32. (1980) AIR 1535. 34 (1980) SCC (1) 98.