

**IN THE HIGH COURT OF JUDICATURE AT**

**BOMBAY**

**ORDINARY ORIGINAL CIVIL JURISDICTION**

**INTERIM APPLICATION NO.                      OF 2020**

**IN**

**PUBLIC INTEREST LITIGATION NO. 15 OF 2018**

In the matter of Article 14, 15, 21,  
39 (a) and 226 of the Constitution  
of India

AND

In the matter of the order passed  
by the Hon'ble Supreme Court of  
India in Re-Contagion COVID-19  
SMWP (C) 1 of 2020.

AND

In the matter of prayers sought by  
way of Interim Application in PIL  
No. 15 of 2018

Archana Punja Rupwate )  
Occupation- Advocate, having office at )  
1st floor, 61/Jalaram Jyot, )  
Janmabhoomi Marg, Fort, )  
Mumbai- 400001 ) ...  
Applicant

In the matter of ....

Archana Punja Rupwate ) ...Petitioner  
Versus  
1. The State of Maharashtra )  
Through Principal Secretary of )  
the Home Department and Ors. ) ... Respondents

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.....Petitioner

Versus

2. The State of Maharashtra

Through Principal Secretary of )  
 the Home Department and others )...  
 Respondents

### **SYNOPSIS**

It has been reported that inmates at the Arthur Road and Byculla prisons have contracted the contagion COVID-19. The Hon'ble Supreme Court vide order dated 23.03.2020 on its Suo Moto Writ Petition ( C ) 1/2020 to constitute a High Power Committee who will then assess the situation and measure ways to decongest prisons as a method to prevent the spread of the CoronaVirus. This Interim Application seeks to assail that the state of Maharashtra determines its inmate holding capacity for each prison based on social distancing norms as prescribed by the World Health Organisation / Central Government.

### **LIST OF DATES AND EVENTS**

Sr. No.	Date	Particulars
	January 2020.	India witnessed an outbreak of the coronavirus, otherwise known as COVID-19,

		or SARS-CoV-2 in late January 2020.
	11th March 2020.	The World Health Organization declared COVID-19 as a global pandemic.
	23rd March 2020	In view of the outbreak of Corona Virus Pandemic that has gripped the world and due to it being highly contagious, the Supreme Court of India has taken cognizance of the current situation of prisons. Passed an order directing states and UTs to constitute a High Power Committee to decongest the prisons in India.
	25th March 2020	High Power committee took a decision and directed the state government to release the Convict who are undergoing imprisonment for the offence punishable with imprisonment of 7 years or less
	31st March 2020	State of Maharashtra prison Department published an annual report regarding the capacity and actual number of prisoners incarcerated in the prisons in Maharashtra
	6th May 2020	Petitioner made a representation to the High

		Powered Committee requesting the High Powered Committee identify the classes of prisoners and release them on temporary bail or parole.
	7th May 2020	The petitioners have learnt that a large number of the prison population of Arthur Road Prison have tested positive
	8 <sup>th</sup> May 2020	The state of Maharashtra issued a notification amending the parole rules on 8.5.2020.
		Hence this Application

**I. POINTS TO BE URGED:**

1. Whether Respondents are mandatorily required to release the prisoners in the state of Maharashtra?
2. Whether the Respondents should take necessary steps to decongest the central prisons in Maharashtra due to the spread of the coronavirus in prisons particularly in Arthur Road Central Prison?
3. Whether State has to reduce prison population down to an empirically determined number based on existing standards in combating COVID 19?

**II. ACTS AND LAWS RELIED UPON:**

- a. The Constitution of India 1950.
- b. The Indian Penal Code.

- c. The Criminal Procedure Code, 1973.
- d. Maharashtra Prison Manual

**III. AUTHORITIES / CASE LAWS CITED**

At the time of arguments

Advocate for the Petitioner

**IN THE HIGH COURT OF JUDICATURE AT BOMBAY**

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Versus

3. The State of Maharashtra )  
Through Principal Secretary of )  
the Home Department )  
Mantralaya, Madam Cama Road )

- Mumbai - 400032 )
2. The State of Maharashtra )  
 through Principal Secretary of )  
 the Law and Judiciary Department )  
 Mantralaya, Madam Cama Road )  
 Mumbai - 400032 )
3. Director General of Police )  
 Maharashtra Police, )  
 Chhatrapati Shivaji Maharaj Marg, )  
 Colaba, Mumbai - 400001 )
4. Addl. Directorate of Police & )  
 Inspectorate )  
 of Prisons and Correctional Services, )  
 2nd Floor, Old Central Building )  
 Pune - 411001 )
5. Addl. Director General of Police )  
 (Law & Order) )  
 Chhatrapati Shivaji Maharaj Marg, )  
 Colaba, Mumbai - 400001 )... Respondents

**TO,**

**THE HONOURABLE THE CHIEF JUSTICE AND OTHER  
HONOURABLE JUDGES OF THE HIGH COURT OF  
JUDICATURE AT BOMBAY**

**THE HUMBLE PETITION OF  
THE PETITIONERS ABOVE  
NAMED**

**MOST RESPECTFULLY SHEWETH**

1. The Petitioner, is a practicing advocate who has served as prison panel lawyer under the District legal Service Authority providing legal aid to under trial prisoners and convicted prisoners which required her to conduct weekly visits to Arthur Road Prisons among others for a couple of years.
2. The Respondents collectively are various agencies of the State of Maharashtra working in collaboration inter alia for implementing and enforcing various laws and rules under the criminal justice system and obligation of the Respondents on improving the Maharashtra Prison system.
3. The Petitioner seeks to assail the failure of the State of Maharashtra in following the directives of the Hon'ble Supreme Court, in both letter and spirit, concerning the

decongestion of its prisons and thereby giving an equitable chance to the prison population at survival. The Petitioner seeks to assail the failures of the State of Maharashtra in failing to carry out the most elementary step of determining the number of inmates it can retain within its prison facilities to be able to give its prison population a chance at survival and then taking steps to reach that number. It is contended that reducing the prison population arbitrarily is not sufficient and that the State has to reduce them down to an empirically determined number based on existing standards in combating COVID 19. Failure to do so endangers the life of its prison population as well as of its own employees.

#### **BACKGROUND TO THE PRESENT CASE**

4. The COVID virus commonly known as the CORONAVIRUS, Coronavirus disease 2019 (COVID-19) is an infectious disease caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). On 11th March 2020, the World Health Organization declared COVID-19 as a global pandemic after noting that COVID-19 has increased 13-fold in countries other than China. The Union Government has issued a slew of directions for the containment and management of the virus under The

National Disaster Management Act, 2005 while State Governments have also declared COVID-19 an epidemic, including the State of Maharashtra, in order to invoke the emergency provisions of the Epidemic Diseases Act, 1897.

5. Because a vaccine against SARS-CoV-2 is not expected to become available until 2021 at the earliest a key part of managing the COVID-19 pandemic is trying to decrease the epidemic peak, known as flattening the epidemic curve through various measures seeking to reduce the rate of new infections. Slowing the infection rate helps decrease the risk of health services being overwhelmed, allowing for better treatment of current cases, and provides more time for a vaccine and treatment to be developed. One of these measures is strict social distancing which assists in breaking the “virus-chain” by maintaining physical distance between potentially infectious persons, thereby preventing the spread of the virus. Virulent spread of the virus poses a grave challenge to both state and non-state actors in dealing with the present pandemic, especially without adequate know-how and resources.
  
6. Hence, the present prescription of social distancing to flatten the curve that equips not only the State and non-State actors to get their act together but also helps contain and

determine the spread, buys time for the healthcare system of the nation and eventually assists in extinguishing the virus by containing it beyond its lifespan.

7. As per news reports, Indian prisons accommodate 4.66 lakh prisoners as of 2018, as against a capacity of 3.96 lakh inmates. Out of the existing prison population, 3.23 lakh prisoners are undertrials who still await trial before court. While these numbers are distributed unevenly across the various state prison facilities of India, they present a picture of a huge degree of prison overcrowding. Not only does the overcrowding contribute to inhumane and undignified living conditions, they present a major obstacle in the management of the COVID-19 pandemic. This is without prejudice to the case of the Petitioner the norms of Prison Holding is abysmally outdated and warrants a revisit.
8. In Maharashtra as against the reported holding capacity of 24,032 prisoners, at the end of March 2020, over 36,061 people were lodged in prisons across the state, which is a population size way beyond its present capacity. Maharashtra has totally 9369 convicted prisoners, 26762 are undertrials (75%) and 130 are under preventive detention. The breakdown of the details as set out in the Website of the Government (in Marathi) is annexed and marked

**Exhibit A** is the copy of the annual inmates' population as on 31st march 2020.

9. The inadequacy of prisons should not be seen as a submission by the petitioners as to what should be the ideal population that could be interned within the prison walls during the pandemic. The only submission is that the holding capacity that has been determined by the authorities for each of its prisons was on the basis of a reasonable formula that subsisted before the pandemic and that itself is unacceptable, per se.
  
10. The WHO has provided for social distancing to be maintained so as to effectively contribute to flattening the curve of the disease outbreak. As per the Ministry of Health and Family Welfare, social distancing is a non-pharmaceutical infection prevention and control intervention implemented to avoid/decrease contact between those who are infected with a disease causing pathogen and those who are not, so as to stop or slow down the rate and extent of disease transmission in a community. This eventually leads to decrease in spread, morbidity and mortality due to the disease.

11. While social distancing has now been construed to mean... a distance of at least 2 meters between two individuals, the latest reports seek to suggest that this is inadequate and needs revision. For contained spaces it is worthwhile to mention this does not work arithmetically but exponentially. That is to say, it works in multiples and not in simple terms of an add too. Particularly as there is no uniform shape, size and uniformity in infrastructure facilities in Prisons.
12. Particularly for Prisons and other holding institutions the WHO has recommended the following;
- a. Actions need to be taken to enable and support coordinated, collaborative efforts across organizations to achieve IPC (infection, prevention and control), following national guidance. Such actions should be commensurate with the level of emergency at the time to avoid panic and to ensure implementation of the most appropriate response at the appropriate time.
  - b. Custodial/detention staff should work together with health-care teams in prisons and other places of detention to enable identification of suspected cases among prisoners/detainees, their subsequent isolation



in single accommodation and a subsequent clinical assessment.

- c. Screening at point of entry to prison should be available: health-care and public health teams should undertake a risk assessment of all people entering the prison, irrespective of whether or not there are suspected cases in the community; information should be collected on any history of cough and/or shortness of breath, patients' recent travel history and possible contact with confirmed cases in the last 14 days.
  
- d. In the context of the current COVID-19 outbreak, the containment strategy includes the rapid identification of laboratory-confirmed cases, and their isolation and management either on site or in a medical facility. For contacts of laboratory-confirmed cases, WHO recommends that such persons be quarantined for 14 days from the last time they were exposed to a COVID-19 patient.
  
- e. Prison authorities should be informed and made aware of the hospitals to which they can transfer those requiring admission (respiratory support and/or

intensive care units). Appropriate actions need to be taken for any confirmed cases, including transfer to specialist facilities for respiratory isolation and treatment, as required; appropriate escorts should be used and advice on safe transfers followed. However, consideration should be given to protocols that can manage the patient on site with clear criteria for transfer to hospital, as unnecessary transport creates risk for both transport staff and the receiving hospital. A copy of the WHO guidelines are annexed and marked as **Exhibit B**.

13. It is the case of the petitioners that the prescription that the state will have to take to decongest its presence would be to;

- a. Decide, on the basis of the WHO prescriptions of social distancing, what the holding capacity of its prisons should be.
- b. Having come to that conclusion, it will then have to work at achieving that number of inmates in its prisons.

- c. It could do so, in a manner of speaking, similar to the exercise that it initiated which was to classify its inmate population on the basis of the sentence that they are to undergo or would undergo if convicted to the maximum sentence
  - i. It could do so either by releasing its inmates until the end of the pandemic on necessary undertaking
  - ii. Or relocate large portions of its inmate population to other locations so as to ensure that at its existing prisons and every alternate location that it creates it maintains the prescription of social distancing required to flatten the curve
  
- d. What state of Maharashtra did was it simpliciter identified a certain number of prison population on the basis of the period that they were to undergo a sentence and released it is the case of the prison petitioners that this exercise was halfway to exercise that it abandoned midway

14. Subsequent to the Supreme Court's directive, the petitioner made a representation to the High Powered Committee requesting to identify the certain classes of persons who are

more vulnerable to the virus in case there is a fear of the Virus spreading in the prison and priority should be given to release them on bail/parole for a period of six months, namely;

- a. Sick or infirm UTPs/Convicts including those with HIV, TB, and other serious illnesses.
- b. Women with children, pregnant women, lactating mothers
- c. Prisoners with disabilities
- d. Aged prisoners over 60 years.
- e. In addition, the following categories of convicts may also be considered for release:
  - i. Convicts who have completed their sentence however due to non-payment of fine are still in prison.
  - ii. Convicts who are in semi open or open prisons and may soon be released.
  - iii. Convicts who are eligible for pre-mature release

Hereto marked and annexed **EXHIBIT C** is the copy of the representation and recommendation submitted to the High Power Committee of the state of Maharashtra. The High Powered Committee at its meeting dated 24th March 2020 took a decision to release certain prisoners. A copy of this

decision is annexed and marked as **Exhibit D**. However there is no impediment to further relax the criteria and immediately release a large number of prisoners with necessary protection so that the threat of virus is considerably reduced if not totally eliminated.

15. The petitioners have now learnt that a large number of the prison population of Arthur Road have tested positive. Due to the delayed process of the Respondents and non-compliance of the order of the Hon'ble Supreme Court, today more than 100 prisoners and around 26 staff members of prison are tested positive for Covid-19 in Arthur Road central Prison. Hereto marked and annexed **Exhibit E** is the copy of the Newspaper article dated 07.05.2020.

16. Information from other prisons is not available in the public domain, but the petitioners are confident that circumstances not being any different for the other prisons steps are taken to determine infection rate a similar picture will arise.

17. The Respondents have also issued a Notification amending the parole rules on 8.5.2020, making certain amendments to the Maharashtra Prisons (Mumbai Furlough and Parole) Rules, 1959. By the Maharashtra Prisons (Mumbai Furlough and Parole) (Amendment) Rules, 2020, the state

has considered two categories of convicted prisoners for release - firstly, the convicted prisoners whose maximum punishment is 7 years or less; secondly, the convicted prisoners whose maximum sentence is above 7 years. In the case of the second category of prisoners the Rules provide that they shall, on their application, be appropriately considered for release on emergency parole by Superintendent of prison, if the convict has returned to prison on time on last 2 releases (whether on parole or furlough). This would imply that if a convicted prisoner whose maximum sentence is above 7 years has not previously made an application for release on parole or was not eligible to make such an application, such a convict will not be able to avail the benefit of this amendment. Considering that the intent of the amendment is to decongest prisons in light of the spread of COVID-19, to make the release of convicted prisoners subject to these two pre-conditions is arbitrary. Hereto marked and annexed **Exhibit F** is the copy of the Notification dated 8th May 2020.

18. Aggrieved by the non-application of mind of the respondent authorities to ensure that its prison population has an equitable chance of survival, the petitioners seek to assail

the same on the following grounds which are without prejudice to one another

**Grounds:**

- a. That even after the High Powered Committee took a decision and directed the state government to release the Convicts who are undergoing imprisonment for the offence punishable with imprisonment of 7 years or less, the state of Maharashtra has not released a considerable number of prisoners to decongest the prisons by granting emergency parole.
  
- a. That despite the order of the Honourable Supreme Court the state of Maharashtra has failed to release the prisoners by granting emergency parole, thereby frustrating the very object and purpose of the directions of the apex Court. Hereto marked and annexed **Exhibit G** is the copy of the order in Suo Motu Writ Petition(C) no 1 of 2020 passed by the Supreme Court of India dated 23.03.2020.
  
- b. Further, petitioners submit that the Honourable Supreme Court had directed the high power committee to frame guidelines so as to ensure that the prisoners are released and the prisons are

decongested, that too by considering the guidelines laid down by the Honourable Supreme Court in the case of *Arnesh Kumar vs. State of Bihar* reported in 2014 8 SCC 273. The Honourable Supreme Court had directed in the said case that the authorities shall ensure that no person who is accused of an offence punishable with imprisonment of 7 years or less shall be incarcerated without cogent reasons.

- c. The High Powered committee has taken a decision the same has not been implemented fully and besides the High Powered Committee as also this Hon'ble Court can always add to the categories of prisoners who can be released. The total number of people released so far is 5500 which is around 5 % of the total number of the prisoners. Despite the fact the High Power Committee in its wisdom has categorised only those who are in for the cases of less than 7 years imprisonment. But if you see the real data 5 % reduction is not going to help in social distancing considering the present situation. Therefore the High power Committee needs to expand the category in order to reduce the overcrowding in the prisons.



- d. That despite an elapse of more than one and half months from the decision of the High Powered Committee, the State Government of Maharashtra has not taken appropriate measures to prevent the spreading of the coronavirus in the prisons in Maharashtra. In consequence more than 100 prisoners and 26 staff members in Arthur Road Central prison have tested positive for coronavirus.
- e. The prisoners were released on temporary bail pursuant to the direction of the High Powered Committee during the period between 26th March 2020 to 31st March 2020. Even after release of those prisoners on temporary bail the central as well as the district jails in Maharashtra are still overcrowded, as per the data provided on the website of the Maharashtra prison department as on 31st march 2020.
- f. That as per the data provided by the state government the total sanctioned capacity of the all Central jails in Maharashtra is 14491, however, the actual number of prisoners accommodated in them is 25745, which is almost 150% in number. Thus, 11, 254 Prisoners

more than sanctioned strength are incarcerated in the nine Central Prisons in the state of Maharashtra.

- g. Under Rule 13 of Chapter V of Maharashtra Prison Manual, in every sleeping barrack the minimum space per prisoner shall be 3.71 square metres and 15.83 cubic metres and in hospital wards 5.58 square metres and 23.75 cubic metres. Provided that, if the State Government, Inspector-General or Superintendent is of opinion that it is necessary or expedient so to do for providing accommodation to prisoners in sleeping barracks on any occasion, it or he may relax the provisions of this rule to such extent as may be necessary having regard to the circumstances of the occasion. 14. Cells shall have a ground area of not less than 8.92 square metres and a cubic capacity of at least 33.98 cubic metres. However, presently the prisoners do not even have the required space instead it is far less than it is required in some prisons such as Arthur road central jail, which has the capacity to keep 800 but the actual number is 2941 which is almost 4 times over its capacity. The situation in other central jails is also quite similar. Hereto marked and annexed **Exhibit H** is the copy of Chapter 5 of the Prison Manual.

- h. Non-compliance of WHO guidelines and measures as enumerated by the World Health Organisation entitled 'Preparedness, prevention and control of COVID-19 in prisons and other places of detention' dated 15<sup>th</sup> March 2020 reduces the chances of the inmate's survival.
  
- i. That when the State on one hand submits that it is hard pressed for Personnel and Resources, the State cannot be countenanced to argue that some greater good will be achieved by holding onto the inmates in Prison. The State should work at identifying those core functions that it should undertake and cutting itself free of the other functions like holding onto inmates beyond its subsisting capacity.

19. The Petitioners state that;

- a. They have not filed any other application in respect of the subject matter in this Hon'ble Court or in any other High Court or in the Supreme Court of India.

- b. They have no other alternative efficacious remedy but to approach this Hon'ble Court and the reliefs as prayed for if granted shall be complete.
- c. They will rely on documents a list whereof is annexed hereto.
- d. There is no delay or laches in filing this Petition.
- e. The Petitioner has paid the required court fee of Rs. \_\_\_\_\_ to this Petition.
- f. The Petitioners has not received any caveat from the Respondents as on date of filing of this Petition.
- g. That due to the Current Lockdown the Petitioners are unable to affirm the Petitioner and request that they be permitted to do so as soon as the situation permits.

**20. The Petitioners therefore pray that;**

- a. That this honourable court be pleased to issue a writ of mandamus or any other order with direction in the nature of mandamus directing state of Maharashtra to forthwith determine its inmate holding capacity for each prison based on social distancing norms as

prescribed by the world health organisation / central government.

- b. That this honourable court be pleased to issue a writ of mandamus or any other order with direction in the nature of mandamus directing state of Maharashtra to take rational steps to decongest its prisons so as to arrive at the inmate holding capacity for each prison determined as above by enlarging inmates on the necessary undertakings
- c. That this honourable court be pleased to issue a writ of mandamus or any other order with direction in the nature of mandamus directing state of Maharashtra in furtherance of achieving an optimum inmate capacity due to the present pandemic release the following prisoners on a priority;
  - i. Sick or infirm UTPs/Convicts including those with HIV, TB, and other serious illnesses. or comorbidities such as diabetes, cancer, heart disease, blood pressure, etc. .
  - ii. Women offenders
  - iii. Women with children, pregnant women, lactating mothers
  - iv. Prisoners with disabilities

- v. Aged prisoners over 60 years.
- vi. In addition, the following categories of convicts may also be considered for release:
  - 1. Convicts who have completed their sentence however due to non-payment of fine are still in prison.
  - 2. Convicts who are in semi open or open prisons and may soon be released.
  - 3. Convicts who are eligible for premature release;

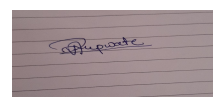
d. Ad-interim reliefs in terms of prayer clause (b)

e. For any other order or direction with this honourable court may deem fit to secure the ends of justice in the facts and circumstances of this case.;

f. For costs;



Advocate for the Petitioner



Petitioner

**VERIFICATION**

I, Archana Punja Rupwate, the Petitioner, do hereby state and solemnly declare that what is stated in para. No.1 to 8 is true to my own knowledge and what is stated in the remaining paras no. 18 onwards is stated on information and belief and I believe the same to be true.

Solemnly affirmed at Mumbai )

On this 9th Day of May, 2020 )

Petitioner

Identified by me



Afreen Khan

Advocate for the Petitioner

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