Both crime against women and crime by women a serious problem which puts harmful effects on our society. So, need of the hour is to make sincere efforts by the society, policy makers and the law enforcement authorities to prevent the women from becoming ‘victims’ as well as ‘criminals’. For the progress of the society, protection of women is very essential. Various studies have explored both the impact of crime on the lives of women’s as well as the role of women in crime. But as compared to the Crime against women, crime committed by women has not received much attention. Due to neglect of crime committed by women, the women prisoners often receive little attention and hence, their rights are often ignored. Even researcher had no awareness about the (showed no awareness about the) rights of women prisoners before the beginning of the study.

Researcher has chosen this study entitled, “Problem of Abuse of Women Prisoners’ Rights in India With Special Reference to Punjab” in order to know what type of problems are being faced by women prisoners as the result of abuse of their rights in prisons. For this purpose researcher interviewed two hundred twenty six women prisoners confined in seven Central Jails in Punjab with the help of the interview schedule.

The researcher reviewed the nature of crimes committed by the women, punishments imparted to them for such crimes and the existence of the prison system, from ancient period to pre-independence period and till date. In ancient period, women’s crime was seen from moral perspective. Society had established the stringent moral boundaries for women and prescribed the harsh punishments for those who transgressed. The criminal law of ancient period was very severe but great importance was given to punishment because according to Manu it was the only danda which regulate the human behavior and because of which a man can enjoy life in society. A general rule regarding impartment of punishment for crime committed by women was that lesser punishment is to be inflicted on them. In the case of all offences women are
to suffer half of the fine in money which is prescribed for a male offender and when the punishment is death for a male, the punishment for women would be the excision of a limb. Hence, physical punishments such as cutting of nose, ears, limbs, whipping, banishment, drowning in water were imparted to the women offenders. Women offenders were not considered just violators of the criminal code but at the same time violator of the social mores. Imprisonment was not a usual form of punishment in ancient India. Although, the prison were existed in ancient period but little information is available about length of prison sentence.

During the Medieval period, the normal code of punishment was very severe. The punishment for men and women was same. Punishment was postponed in case a woman was pregnant and until she recovers from labour. During this period also, imprisonment was also not usual form of punishment. Imprisonment was imparted without trial. Prison was in existence but not as existed in present times. Very harrowing treatment was given to prisoners. Imprisonment was mainly available for the political offenders and enemy kings etc. The prison conditions were totally unsatisfactory.

In the beginning of the modern or British period various types of hard punishments were given to both male and female offenders. Beside those punishments, two punishments which were very often used by the Britishers were transportation and imprisonment. Prisons were in existence, but the physical conditions of the prisons were very unsatisfactory. Numbers of atrocities were inflicted by the British authorities on the prisoners. Male and female prisoners were confined together. Both male and female prisoners were employed for labour work on roads and in forests.

Numbers of committees were appointed by the British government to improve the prison conditions. They enacted the Prison Act in 1894 in order to regulate the jail administration in a uniform manner. From the review of the reports of various committees and commissions constituted by the Government of India from time to time such as, All India Jail Manual Committee 1957-59, Mulla Committee 1980-83, National Expert Committee on Women Prisoners 1986-87, 135th Report of Law Commission on “Women in Custody” 1989, and the Parliament Committee on Empowerment of
Women 2001-2002 it has been concluded that all these committees analysed the conditions of women confined in various jails in India and found their conditions pathetic and therefore, made a number of concrete recommendations to be adopted by the Government so that conditions of women prisoners can be improved. The Chairman of National Expert Committee on Women Prisoners 1986, Justice Krishna Iyer described the conditions of women prisoners prevalent at that time in the following words; “Women in custody are tragic testimony of judicial futility, statutory impotency and implementation calamity”.

This statement reflects that the conditions of women prisoners in jails were pathetic due to the ignorance or lack of initiatives on the part of the judiciary to improve the conditions of women prisoners in jails. From statutory impotency, he meant that penal statutory laws are silent about how to treat the women prisoners or do not contain the gender-specific treatment programs for women prisoners, the statutory laws are harsh on women prisoners. From implementation calamity, he means that implementation of various recommendations given by various committees is zero or there is no implementation of any suggestions given by various committees regarding the treatment of women prisoners by the Government.

Malimath Committee appointed by the Indian Government in 2003 to bring criminal justice reform expressed its gratitude to the Home Ministry’s vision of comprehensive reforms of the entire criminal justice system. But Reena Kaul criticised the Malimath committee that though this committee claims to have applied its mind to the grave problems faced by the courts, but there is little to suggest that it considered the grave problems faced by the most vulnerable sections of Indian society vis-à-vis the criminal justice system. According to her, there is deafening silence in the Malimath committee report on certain issues like the criminalization of poverty, the crisis in legal aid and the failure of the criminal justice system in protecting the human rights of the poor, dalits, minorities and other vulnerable sections of society.

In order to know the abuse of women prisoners’ rights, it is essential to know what rights are available to women prisoners because without the availability of rights

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there abuse cannot be possible. Therefore, in order to know what rights are available to
women prisoners, researcher analyzes the national, international and regional laws
related to prisoners.

From the review of the national laws those dealing with prisons and prisoners,
such as, the Prison Act 1894 adopted one hundred twenty years ago by the Britishers,
the researcher came out with insight that this act contains few provisions regarding the
treatment of women prisoners. This is the central act which provides for the regulations
of prisons throughout India. It requires the states to provide separate accommodations to
women prisoners from male prisoners, in order to protect women prisoners from torture.
Act also requires that the search and examination of women prisoners should be carried
by female staff and restrict the exposition of handcuffs, fetters and whipping on women
prisoners. But unfortunately, this act lacks the provisions to protect the gender specific
needs of women prisoners. Act also lacks provisions relating to institutional correctional
programs for the rehabilitation of women prisoners. Thus, with respect to the treatment
of women prisoners this act requires fresh look.

Punjab Jail Manual 1996 also contains few separate provisions to prevent
torture or harassment of women prisoners in order to protect their inherent dignity, such
as, separate accommodation for women prisoners, protection against exploitation, extra
diet for pregnant and nursing mothers, prohibition of imposition of handcuffs and
chains on women prisoners, right to medical care and treatment but lacks the gender-
specific correctional measures such as educational, vocational and work programmes
along with the post-release programs for the rehabilitation and reintegration of women
prisoners. Similarly, other penal acts such as, the Punjab Good Conduct Prisoners’
1966 contains few provisions regarding treatment of women prisoners. It is very
unfortunate that Indian Government is still applying one hundred twenty two years old
Prison Act 1894.

Police, the chief law enforcing authority plays an important role in the
protection of human rights of the citizen by maintaining law and order in society. But it
is very sad part that the image of police is not good. Police always treat the male and
female offenders equally. Women offenders have more chances of sexual exploitation and harassment in the police custody due to their gender. Mathura’s case is a best example of custodial sexual violence against the women in India. According to United Nations Special Rapporteur on Torture, custodial violence against women very often includes rapes and other forms of sexual violence, such as treats of rape, touching, virginity testing, being stripped naked, invasive body searches, insults and humiliation of a sexual nature etc. Section 376-D, inserted by the Government of India into the Indian Penal Code 1860 through the Criminal (Amendment) Act, to provide protection to women against custodial sexual abuse, not amounting to rape is really commendable.

The human rights provisions added in the Punjab Police Rules 2011, to prevent the violation of the women prisoners’ rights, to be followed by the police while dealing with the women prisoners is really a praiseworthy step taken by the Punjab Government in this direction. It is submitted that if these rules would be strictly implemented, the abuse of rights of the women prisoners can be prevented to a great extent.

With regard to judicial approach to protect the rights of prisoners in general and of women prisoners in particular, in recent past, it is observed that the Supreme Court after Maneka Gandhi’s case has recoganised number of human rights of prisoners available to them beyond liberty under Article 21 of the Constitution. These rights are equally applicable to both male and female prisoners. And according to the Article 141 of the Constitution, Government of India is obliged to safeguard these rights of the prisoners. But it seems that government has failed to safeguard these human rights of prisoners to large extent. With regard to the protection of gender-specific rights of women prisoners, only in Upadyaya’s Case Supreme Court laid down the guidelines for the government to provide pre-natal and post-natal facilities and provisions for children of women prisoners. Except this judgment, there is no other judgment from Supreme Court which obliges the state to provide compulsory treatment to women prisoners for their rehabilitation and reintegration. Punjab prison department also failed to implement the guidelines regarding the pre-natal and post-natal care program and programs for the children of women prisoners. Thus, from this study it is realized that

2 AIR 1978 S.C. 597
there is requirement that Judiciary should recognize the gender-specific needs of women prisoners to protect women prisoners from discrimination regarding their treatment for the purpose of rehabilitation and reintegration into society after release from the prison.

From the Review of the International Conventions, guidelines, rules and provisions it is found that before the adoption of the Universal Declaration of Human Rights, 1948 prisoners were not considered liable to have any rights. It is Universal Declaration of Human Rights which held that prisoners are also human beings and should be treated with humanity and the main purpose of imprisonment should be the reformation and rehabilitation of prisoners.

Besides these basic human rights instruments, the first ever initiative at international level to protect the rights of the prisoners was taken with the adoption of the Standard Minimum Rules for the Treatment of prisoners, in 1955 by the United Nations. These Rules provide the guidance to the member states as how to treat the prisoners. But these Standard Minimum Rules 1955 are not exhaustive and contain few provisions to protect the gender-specific rights of women prisoners, for instance rules require the member states to provide separate accommodation to women prisoners, to provide pre-natal and post-natal care and treatment to pregnant women prisoners, protection against abuse by male prisoners and male officials.

Although United Nations started taking steps to protect the rights of women immediately after its establishment, but the discrimination and violence often perpetuated against women. In order to prevent the discrimination and violence against women, the United Nations took very important step in 1970 and adopted the Convention Against the Elimination of All Forms of Discrimination Against Women, 1970. United Nations also adopted the Declaration on the Elimination of Violence Against Women 1997, in order to guide the member states to prevent every type of discrimination and violence against women, whether she is free or behind bars. Both the convention and the declaration require the states to repeal their discriminatory laws against the treatment of women offenders and prisoners. Further Kyiv Declaration on Women’s Health Rights in Prison 1995 and WHO Guidelines on HIV Injections and
AIDS in Prison provides gender-specific health care needs for women prisoners and guidance as how to take care of HIV-positive women prisoners. Since women are the backbone of the society and the creator of next generation, they need more attention and care.

Although, number of international norms and standards adopted by United Nations relating to prisoners apply equally to male and female offenders but they do not take into account the specific needs of women prisoners. Therefore, in 2010, an important step was taken by the international community regarding the treatment of women prisoners. The United Nations adopted the Standards Minimum Rules for the Treatment of Women Prisoners and Non-Custodial Measures for the Women Offenders, 2010. These rules has recognized the specific conditions and needs of women prisoners and placed those needs at a level of importance that are equal to those of men. These rules also provide guidance to the prison authorities and the criminal justice agencies including the policy makers, the legislators, the prosecution services, the judiciary and the probation services providers, as how to deal with women prisoners. States parties are bound to incorporate these rules in their domestic laws.

These above stated International standards relating to the prisoners can only be beneficial if states incorporate them in domestic laws. The Constitution of India under Article 51 requires the states to foster respect for international law and treaty obligations in dealing with the organized people with each other. Besides this Directive Principle, the Article 253 and 246 of the Constitution of India provides concern for respecting international law and international treaties and conventions. However, barring treaties which require legislation to be made, the international agreements entered by the union in exercise of its executive power under Article 73 which are not contrary to law are required to be recognised by the municipal courts.

Whereas the legislature and the executive have failed to implement the international rules convention, norms, the Supreme Court of India has intervened to issue directions for the effective enforcement of those rules, standards and conventions.

For example in Prem Shanker Shukla’s case while dealing with the handcuffing of prisoners and other in-humiliation inflicted on persons in custody, the Supreme Court
observed that while discussing the relevant statutory provisions and constitutional requirements courts and counsel must never forget the core principle found in Article 5 of the Universal Declaration of Human Rights 1948 which states that “no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.”

In *Sunil Batra’s* case⁴ the Supreme Court took note of Article 10 of the International Council of civil and political rights which states that all people deprived of their liberty shall be treated with humanity and with respect for inherent dignity of the human person. The court also opined that the state shall take steps to keep upto the Standard Minimum Rules for the Treatment of Prisoners recommended by the United Nations, especially those relating to work and wages, treatment with dignity, community contact and correctional strategies.

From the review of the Regional Human Rights instruments, it is found that today regional system is a vital part of the international protection human rights, regional sanction can be more effective than international sanctions. There are three major human rights system on the regional basis, that is (i) the European Human Rights System (ii) American Human Rights System, and African Human Rights System. All these three Regional Systems adopted conventions and charter to protect human rights of its citizens at regional level, to implement the human rights provisions contained in basic conventions and charter such as European convention on human rights and fundamental freedom 1953, American convention on Human Rights 1969, African Charter on Human and Peoples Rights 1981 adopted the European Prison Rules 2006. Principles and Best practices for the Protection of Persons Deprived of their Liberty in America 2008, African Charter on prisoners rights 2001. These three specific instruments relating to prisoners also contains few separate provisions, such as, to provide separate accommodation for women prisoners, pre-natal and post-natal care and treatment for pregnant and mother prisoners, sanitary needs of women prisoners, special needs of women prisoners who faced physical, mental and sexual abuse before or during imprisonment, health rights of women prisoners, personal hygiene of women

⁴ *AIR* 1978 S.C. 1675.
prisoners, supervision of women prisoners by female staff, body searches of women by women staff etc.

But during the review of regional human rights instruments relating to prisoners, researcher has not found any specific regional convention, rules or guidelines for the treatment of specific needs of the women prisoners like United Nations Standard Minimum Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders 2010. Researcher also found that Asian countries too have not formed any regional human rights system in general and to protect the rights of women prisoners in particular.

The study reveals that with regard to judicial approach to protect the rights of prisoners, in recent past, the Supreme Court of India after Maneka Gandhi’s case has recognised number of human rights of prisoners available to them beyond liberty under Article 21 of the Constitution. These rights are equally available to both male and female prisoners. And according to the article 141 of Indian Constitution is Government is obliged to safeguard these rights of the prisoners. But from the present prison conditions it seems that government failed to safeguard these human rights of prisoners with regard to the protection of gender-specific rights of women prisoners, only in Upadyaya’s case Supreme Court laid down the guidelines for the government to provide pre-natal and post-natal facilities and make provisions for children of women prisoners. Except this judgment, researcher has not found any judgment from Supreme Court which oblige the states to provide compulsory treatment to women prisoners and for their rehabilitation and reintegration.

From this study, researcher found that Punjab Government failed to implement the guidelines regarding the pre-natal and post-natal care programs for the pregnant and mother prisoners.

In order to chalk out the treatment programmes for women prisoners the study also touch upon the background of women prisoners it is very essential to know who those women prisoners who committed the crime are. From the analysis of the socio-economic profile of women prisoners, researcher found that majority of women
prisoners were from low and middle class, young, married, illiterate, housewives, belong to Sikh religion at the time of crime.

Traditionally, it was believed that women commit fewer crimes, as compared to men. But from the analysis of criminal profile of women prisoners interviewed for the present study it appears that today women are committing every type of offences. They had committed the crimes both under the Indian Penal Code and Special Local Laws. Three major crimes for which majority of women convicted were murder (35.6%), dowry deaths (21.7%) and crimes under NDPS Act (22.7%). Women convicted for drug peddling under NDPS act were from Ferozpur, Bathinda, Jalandhar and Amritsar. Among these women’s large number belongs to Sansi community and they told the researcher that the male members of their community often used the female members of the family for the drug peddling, as females have less chances of detection. Women prisoners told the researcher that they had committed the drug peddling in order to earn easy money due to the unemployment or death of the husband, to serve the family, to fulfill lust for money, in some cases police has implicated the women in false drug cases due to political rivalry.

About the causes behind dowry deaths, the researcher came to know from study as told by women prisoners that extra-marital affair of daughter-in-law and son, non-adjustable nature of daughter-in-law, false blame leveled by daughter-in-law against in-laws are major causes responsible for conviction under dowry death cases. They also told that dowry laws are deterrent and biased against grooms family.

In case of murder out of total 35.6% cases, in 9.3% cases women had committed the murder of their husbands due to pre and extra-marital affair of wife and husband, alcoholic nature of the husband, misbehavior by the husband in front of children in intoxicated state, wife’s greed for property in case of second marriage, etc. About from the victim-offender relationship researcher found that majority of victims were from the women prisoners’ family of procreation that means the family acquired on marriage. They were daughter-in-law, father-in-law, brother-in-law and children. Thus, the study reveals that married women have committed offences against their in-laws.
As regards the term of imprisonment imparted to the women prisoners, it is submitted that today courts are not adopting lenient attitude towards women offenders, as they are busy implicated in serious offences. About the motive behind the commission of crimes, women prisoners told that they did not want to commit the crime but it was the circumstances that force them to commit the crime. Some women prisoners told that police had implicated them in false cases with the help of the money taken from other party to dispute. In majority of cases, women had committed the offences in the association of their own family members.

From the in-depth examination of the conditions available to women prisoners in prisons in jails of Punjab researcher observed that living conditions in jails were not satisfactory to protect the women prisoner’s general and gender-specific needs, due to non-availability to adequate nutritious food, inappropriate sleeping facilities, crowded barracks due to the presence of large number of women under-trials, bad sanitary conditions, supply of low quality toiletries things, impure drinking water, non-availability of health care facilities due to absence of permanent lady doctor, non-availability of appropriate and adequate medicines, non-availability of adequate and clean clothing and bedding and absence of sanitary napkins. General health conditions of most women prisoners were not upto the mark. They were suffering from multiple diseases. Due to shortage of female staff in all central jails, matrons were not able to provide sufficient attention. As a result, problems of women prisoners remain unattended.

About institutional correctional programmes such as classification and segregation, educational, vocational training, productive work programs, wage system, library facility, legal aid services, facilities to maintain contact with family members, relatives, complaint mechanism classification and segregation of women prisoners for both treatment and management purposes researcher observed that all these facilities were absent in all the central jails. Consequently, all categories of women prisoners, under-trials, convicts, young, old, habitual, first offenders were confined together. Thus, all norms whether national or international are being flouted in these jails.
Educational programs were found totally absent for women prisoners. Vocational programs imparted to women prisoners were inadequate for their rehabilitation. Relevant library facilities which can cater to the needs of women prisoners were absent almost in all central jails in Punjab. Most of the women prisoners lack the awareness about the free legal aid services. In those cases where legal aid services were provided to women prisoners by the lawyers due to the small payment given by the government to the lawyers. Majority of women prisoners were not allowed by the female staff to ventilate their suffering and transmit the same to the higher authorities. As a result, the grievances of the women prisoners regarding the abuse of their right in the jails remained unattended. Pay telephone facilities require changes with regard to time of call etc.

Due to the unsatisfactory conditions of the women prisoners in Central jails in Punjab, numbers of problems are faced by the women prisoners such as absence of Classification and Segregation of Women Prisoners restrict the rehabilitation of women prisoners. Inadequate Food for Women Prisoners: inadequate food puts bad effect on their health. Conditions of Children of Women Prisoners Non-availability of Education for Women Prisoners, Inadequate Vocational Training Programmes for Women Prisoners, Absence of Work Programme for Women Prisoners, restrict the reintegration into the society. Inadequate Facilities for “Mulakaat” With Family Members causes various mental problems, such as tension, depression, phobia, suicidal tendencies etc. Due to Poor Sanitation Conditions, Inadequate Clothing and Bedding Facilities Inadequate Toiletries Things for Women Prisoners, Torture Faced by Women Prisoners in Jails, Distortion of Women Prisoner’s Emotions, Problems Due to Inadequate Free Legal Aid Services causes emotional and physical abuse of women prisoners.

From this study researcher found that women prisoner has considered, as both the prison authorities and the State Government liable for the problems faced by them in the jails. According to women prisoners, Government is not provided proper funds and to prison department. On asking what they expect from Government, women prisoners replied that they just want their early release from the jail after expiry of minimum required period of imprisonment.
Analysis of the conditions of women prisoners in central jails in Punjab has revealed that the purpose of imprisonment is still custodial because prisons do not provide institutional correctional programs for the rehabilitation and reintegration of women prisoners. After-care programs were totally absent to rehabilitate women prisoners released from jail in the society who have no family support. It is submitted that both the central and state prison laws do not cater to the needs of women prisoners. When laws are defective no one can expect proper implementation and humane treatment to the prisoners, especially the women prisoners.

**SUGGESTIONS**

In the light of the above conclusion the following suggestions have been made. If these suggestions are implemented sincerely majority of the problems of women prisoners will be solved.

- In order to prevent the abuse of rights of the women prisoners, first of all it is essential to recognize that women prisoners have gender-specific needs different from men. Government should incorporate gender-specific rules in penal laws to prevent the abuse of their rights.

- There should be co-ordination between three organs i.e. police, judiciary and legislation of the criminal justice system to provide appropriate treatment to women prisoners. Each organ of the criminal justice system should follow human rights provisions while dealing with women prisoners.

- As women’s experience are different and women experience imprisonment differently, present prison laws do not contain adequate provisions for the states to follow with regard to administration and management of women’s prisons and women prisoners. Government should rewrite these prison laws so that women prisoners are not subjected to the same rules as male prisoners.

- All India Model Prison Manual 2003 prepared by the Bureau of Police Research and Development through a wide ranging consultation process involving the major stakeholders in the correction administration in the country. It has since been approved by the Ministry of Home Affairs and circulated to all states and
Conclusion and Suggestions

Union Territories for revising their own jail manual subject to their state specific facts and circumstances. It is very exhaustive Manual which touches upon all aspects of prison management. So, Centre and states/UTs Governments should adopt and implement this manual by revising their jail manual accordingly.

- As the number of women prisoners is increasing the Government should construct new and separate prisons for women prisoners to solve the problem of overcrowding. These newly constructed jails should provide adequate infrastructure to meet the needs of different categories of the women prisoners.

- In order to bring these changes in prison administration regarding women prisoners, political will is very much essential.

- Government should appoint adequate staff, the custodial and the correctional including lady doctors, nurses, psychologists, welfare officers, social workers, teachers and vocational instructors.

- Old and sick women should be given bread or other appropriate food according to their age which they can easily eat and digest.

- Similarly, Government should implement the guidelines of the Supreme Court to provide pre-natal and post-natal care and treatment to pregnant and mother prisoners.

- Clothing and bedding provided to women prisoners should also be suitable for human use.

- Toiletries provided to women prisoners for their personal hygiene should be of good quality.

- Medical facilities and services should meet the gender-specific needs of the women prisoners.

- Permanent lady doctor should be appointed in all central jails with the appropriate helping staff.

- Women prisons should have its own hospital facility to provide medical care to women prisoners. Hospital should have basic medical facilities such as:
diagnostic lab, X-ray machine, ECG machine, dental unit, ambulance etc. and appropriate staff.

- The young women prisoners not convicted for heinous crimes should be provided educational furlough or educational release. In these educational furlough inmates are allowed to leave the facility to take advantage of educational opportunities. Such release can allow the prisoners to have access to program that are geographically remote from the correctional institution, and to curricula that are too specialized to be of interest to a significant group of inmates.

- Dedicated and honest female staff should be employed to handle the women prisoners.

- Training institutes should be constructed and maintained to provide up-to-date training to prison officials regarding treatment of women prisoners.

- Liberal remissions should be provided to women prisoners who have not convicted for the heinous crimes.

- There is need to rewrite the Punjab Jail Manual, 1894 in reference to treatment of women prisoners in order to incorporate the provisions of both general international human rights standards and particularly relating to treatment of women prisoners and guidelines issued by the Supreme Court of India.

- Regarding reintegration of the women prisoners after release from the jail, the Government should create job placement services or a guarantee of suitable employment on release because many employers do not want to hire former offenders.

- Reliable NGOs and other voluntary organizations should be associated with the jails in order to provide correctional counseling to women prisoners to facilitate their reintegration in the society.

- Police should follow human rights provisions while dealing with women prisoners.
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- Diverse vocational training programs should be provided to the women prisoners. These programs should be job oriented.

- Classification is very essential for the correction, rehabilitation and reintegration of women prisoners. So, suggestions made by various prison reform committees regarding classification of prisoners, both for management and treatment purposes should be implemented. Prison staff should be provided training to classify the women prisoners for treatment purposes. Proper infrastructure should be made available to classify the women prisoners.

- Regarding reintegration of the women prisoners after release from the jail, the government should create job placement services or a guarantee of suitable employment on release because likelihood of employment after release from prison is affected by job discrimination and civil liberties. Many employers simply do not want to hire former offenders. In this regard, NGOs can play an important role by imparting vocational guidance to prisoners.

- The Jail Manual was first written in 1896 during the time, when India was colonized by the British and was reviewed in 1996. However, it still remains a mere copy of the previous one without being modified in keeping with widespread changes which have taken place in the Indian society. There is need to rewrite the jail manual in reference to treatment of women prisoners in order to incorporate the provisions of international human rights standards relating to treatment of prisoners and supreme court of India. It is the high time that the state government should implement recommendations of different committees and judiciary.

- The government should also enact legislation in order to implement the international agreements and conventions to address the gender-specific needs of the women prisoners.

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