



## न्यायालय मुख्य आयुक्त दिव्यांगजन

**COURT OF THE CHIEF COMMISSIONER FOR PERSONS WITH DISABILITIES (DIVYANGJAN)**  
दिव्यांगजन सशक्तिकरण विभाग/Department of Empowerment of Persons with Disabilities (Divyangjan)  
सामाजिक न्याय और अधिकारिता मंत्रालय/Ministry of Social Justice & Empowerment  
भारत सरकार/Government of India

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### Case No. 14240/1101/2023

#### In the matter of -

Shri Mujtaba Mubarakali Merchant **...Complainant**

#### Versus

The Chairman,  
Unique Identification Authority of India,  
New Delhi **...Respondent No.1**

The Joint secretary,  
Department of Empowerment of Persons with Disabilities  
Ministry of Social Justice & Empowerment  
Email: [wb113@ifs.nic.in](mailto:wb113@ifs.nic.in) **...Respondent No.2**

#### 1. Gist of the Case:

1.1 Shri Mujtaba Mubarakali Merchant (100% visually impaired) filed a complaint on 22.06.2023 regarding an inaccessible image captcha on the UIDAI Aadhaar portal, preventing him from logging in or updating details. Notice dated 06.07.2023 and reminder dated 21.08.2023 were issued to UIDAI u/s 75 & 77 of the Rights of Persons with Disabilities Act, 2016 (hereinafter referred as the Act), which replied on 17.08.2023 and submitted that the audio captcha and screen reader features were under implementation (estimated 95 working days). The Complainant filed rejoinders dated 02.11.2023 stating the portal remained inaccessible, lacked WCAG compliance, and had additional accessibility issues. After seeking current status from both parties the Complainant reported on 10.06.2025 and submitted that ongoing issues with address updates despite Aadhaar eKYC. UIDAI responded on 17.06.2025 and submitted that accessibility features, including audio captcha, WCAG 2.0 AA compliance, screen reader support, and certifications (GIGW 2.0, STQC),

have been implemented and relevant reports submitted to MeitY.

## 2. Hearing (I):

2.1 A hearing was conducted on 09.07.2024 in hybrid mode.

2.2 The Complainant submitted that he was unable to update his address on the UDID portal due to technical issues and an inaccessible image CAPTCHA on the Aadhaar portal. Despite claims by the Respondent of implementing accessibility features like audio CAPTCHA and WCAG 2.0 compliance, the portals remain inaccessible. The Court suggested to implead the Department of Empowerment for Persons with Disabilities with further recommendations to the Complainant to specify the technical issue for thorough examination.

## 3. Hearing (II):

3.1 A hearing was conducted on 30.10.2025 in hybrid mode. Wherein following parties/representatives were present:

Sl.No.	Name of the parties /Representatives	Parties	Mode
1.	Shri Mujtaba Mubarakali Merchant	Complainant	Online
2.	Mr. Deepak Soni, Assistant Manager Legal, UIDAI Headquarter	For Respondent No.1	Online
3.	Mrs. Sangeeta, Media Division, UIDAI Headquarter	For Respondent No.2	Online
4.	Shri Ram Charan Meena, Under Secy., DEPwD	For Respondent No.1	Online

## 4. Proceedings of the hearing:

4.1 At the outset, UIDAI submitted that Audio CAPTCHA has been implemented on the login page of the myAadhaar portal. The website has been certified at Quality Level-1 under GIGW 2.0 and claims compliance with WCAG 2.1 AA guidelines. Screen reader compatibility has been enabled. An Accessibility Audit Report under Section 46 of the Act was submitted on 13.08.2024. STQC certification has also been

obtained.

4.2 The Complainant acknowledged the improvement and stated that while audio CAPTCHA is available at the login stage, image CAPTCHA without any accessible alternative continues to exist in:

(a) The Help & Grievance section of the UIDAI portal.

(b) Other post-login workflows requiring user validation.

4.3 The Department of Empowerment of Persons with Disabilities (DEPWD), Respondent No. 2, being the nodal ministry for the UDID portal assured coordination and resolution of technical issues and confirmed engagement with the Complainant where required.

## **5. Observations:**

5.1 The Court observes that measurable improvements have been made by UIDAI since the first hearing, particularly with respect to enabling audio CAPTCHA at the login stage.

5.2 However, the continued presence of image CAPTCHA without accessible alternatives in critical service areas such as grievance redressal constitutes partial compliance and does not fully meet the accessibility obligations u/s 42 & 46 of the RPwD Act, 2016 and Guidelines for Indian Government Websites (GIGW 2.0).

5.3 Accessibility must be uniform, end-to-end, and functional and not limited to entry points alone. Certification or audit compliance cannot substitute actual user-level accessibility.

5.4 Being a flagship national digital authority, UIDAI is expected to function as a model public institution in ensuring inclusive digital access.

## **6. Recommendations:**

6.1 In exercise of powers conferred under the Act, the following recommendations are issued:

6.1.1 The UIDAI shall, within one (1) month from the date of this Order:

(a) Remove or replace all image-based CAPTCHA on the myAadhaar portal, including the Help & Grievance section, with accessible alternatives such as audio CAPTCHA or equivalent non-visual verification mechanisms.

(b) Ensure consistent accessibility practices across all user journeys, including post-login workflows.

6.1.2 The UIDAI shall verify its compliance reports and certifications already submitted in connected matters and confirm that the same fully cover the issues raised in the present complaint.

6.1.3 The DEPwD, as the nodal department for the UDID portal, shall:

(a) Re-examine the Aadhaar-based address update workflow to ensure it is keyboard-accessible, screen-reader compatible, and independently usable.

(b) Provide necessary technical coordination and user support, if required.

6.1.4 The UIDAI shall submit an Action Taken Report report to this Court within three months from the date of receipt of this Order, clearly indicating:

- (a) Pages rectified,
- (b) Accessibility mechanisms deployed,
- (c) Confirmation of functional usability for persons with visual disabilities.

6.2 Accordingly, the case is disposed of.

**(S. Govindaraj)**  
Commissioner for Persons with Disabilities