



न्यायालय मुख्य आयुक्त

COURT OF 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 and Empowerment

भारत सरकार/ Government of India

Diary No. DNO/26/CCPD/6703

Dated: 28/08/2026

Case No: DNO/26/CCPD/6703

In the Matter of

Complainant

Shri Vakamalla Manoranjan Reddy (represented by Shri Kongaleti Satyanarayana Reddy)

Versus

Respondent(s)

The Secretary General, Insurance Institute of India, Mumbai

1. Background of the Case

1.1 The Complainant, Shri Kongaleti Satyanarayana Reddy, submitted a grievance dated 14.08.2026 on behalf of Shri Vakamalla Manoranjan Reddy, a candidate with 100% visual disability, who was scheduled to appear in the IC-02 examination on 30.08.2026 and IC-01 examination on 05.09.2026. He stated that despite submitting the candidate's disability certificate, self-declaration, hall ticket and proposed scribe details to the Insurance Institute of India (Respondent) on 12.08.2026, subsequent circulars dated 13.08.2026 and 14.08.2026 required PwD candidates to re-verify their disability status and upload additional documents. However, candidates whose disability status was already registered on the portal were initially not provided an option to upload the newly required documents, thereby creating difficulty in complying with the prescribed deadlines.

1.2 The Complainant further alleged that requiring the educational qualifications and declarations of third-party scribes to be verified by the candidate's Branch Manager/employer was impractical, as employers may not have the authority or mechanism to verify an external scribe's qualifications. He also submitted that requiring fixed scribe details and repeated documentation for multiple examinations creates additional hardship for PwD candidates, particularly as the Respondent conducts several examinations

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during the year. It was further alleged that similar difficulties were being faced by other candidates with disabilities. The Complainant therefore sought intervention to ensure reasonable accommodation, including accessible scribe arrangements, and to prevent denial of examination opportunities on account of impractical portal requirements or documentation conditions.

2. Hearing

2.1. A preliminary hearing was conducted on 27.08.2026 wherein the following parties/representatives were present:

Sl. No.	Name of the Parties / Representatives	On Behalf of
1.	Shri Kongaleti Satyanarayana Reddy	Complainant
2.	Shri Vakamalla Manoranjan Reddy	Complainant
3.	Shri P. Jaipuria, Secretary General	Respondent
4.	Smt. Chitra Raikar, Deputy Secretary	Respondent
5.	Smt. Vrushali Nagawekar, Assistant Secretary	Respondent
6.	Smt. Vinita Sarang, Administrative Officer	Respondent

3. Record of Proceedings

3.1 During the proceedings, the Complainant further submitted that the requirement of having the educational qualifications and declarations of the proposed scribe verified and signed by the candidate's

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Branch Manager was causing practical difficulties, as the employer may verify the identity and employment status of its employee but may not have the authority or mechanism to verify the educational qualifications of an external scribe. It was submitted that, although the Branch Manager of the concerned candidate ultimately agreed to undertake such verification after persuasion, the same could not reasonably be expected from every employer or in every case.

3.2 The Complainant further submitted that the Respondent conducts multiple examinations during the year and that candidates may be required to appear in several examinations/papers, making it difficult and burdensome to arrange and obtain approval for a scribe on every occasion. It was also submitted that the requirement of obtaining certification from a medical authority regarding the requirement of a scribe was not appropriate for the purpose of verifying the educational qualifications of the scribe, as a medical authority could certify the candidate's disability and functional limitations but could not be expected to certify the educational credentials of a third-party scribe.

3.3 The Complainant also requested that the Respondent consider arranging scribes for candidates with visual disabilities through its own mechanism/service providers instead of requiring candidates to arrange their own scribes. It was further requested that the Respondent introduce screen-reading software/facilities in its examinations so that candidates with visual disabilities may independently undertake the examinations. The Complainant submitted that such a facility would substantially reduce the recurring difficulties and expenditure associated with arranging scribes for multiple professional examinations.

3.4 The Complainant further questioned the requirement that a scribe should possess an educational qualification one level below that of the candidate, submitting that the examinations conducted by the Respondent are professional/technical qualification examinations and not ordinary academic examinations. It was submitted that, provided the scribe is not from the relevant professional/insurance background and does not possess specialised knowledge of the subject, the insistence upon a particular educational qualification may be reconsidered.

3.5 The Respondent submitted that the application and documents of the candidate had been received and were under consideration. It was stated that several applications had already been screened and approvals had been issued and that the case of the present candidate was also being processed. The Respondent clarified that there had been no rejection or denial of the candidate's request and assured the Commission that the candidate would be contacted in case any further clarification or documentation was required.

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3.6 The Respondent submitted that verification and authentication of the credentials of the proposed scribe formed part of the prescribed process and was considered necessary to ensure the authenticity of the documents submitted. It was stated that where the same scribe continued to assist the candidate, repeated authentication may not be required, whereas in the event of a change of scribe for another examination, verification of the new scribe would be necessary.

3.7 The Respondent explained that the portal-based system had been introduced with the intention of maintaining the disability-related documents of candidates on record so that such documents would not have to be collected repeatedly for every examination. It was submitted that the disability status and relevant certificates were intended to be uploaded once, while details relating to the scribe could be furnished as and when required for the respective examination. The Respondent stated that the purpose was also to enable the examination service providers to identify candidates requiring accessibility-related arrangements, such as lifts and other facilities.

3.8 The Respondent further submitted that it had recently formulated/revised its requirements relating to scribes after taking into consideration the relevant rules and practices followed by other examination bodies, including IBPS and NISM. It was stated that the revised provisions had been placed before the competent examination committee and were under consideration. The Respondent also informed the Commission that it was exploring the availability of suitable screen-reading software and would examine the possibility of implementing the same for the benefit of candidates with visual disabilities. It was further stated that the Respondent was willing to explore arrangements for providing scribes through its service providers.

4. Observation and Recommendation

4.1 The Court, upon consideration of the submissions made by both sides, observed that verification of the identity and educational credentials of a proposed scribe is a legitimate requirement and cannot, by itself, be dispensed with. However, the Court observed that such verification ought not to be restricted exclusively to the candidate's employer where the candidate faces genuine difficulty in obtaining such certification. The Respondent was accordingly advised to provide an alternative mechanism for verification through an appropriate competent authority, including a Gazetted Officer or any other person competent to verify the original identity and educational documents of the proposed scribe.

4.2 The Court further observed that once the documents of a scribe have been duly verified and accepted, the candidate should not be subjected to repeated verification of the same documents without a

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specific requirement. In the event that any document is subsequently found to be false, fabricated, manipulated or otherwise invalid, the Respondent would remain at liberty to take appropriate action in accordance with the applicable rules, including withholding of the result or disqualification, as the case may be.

4.3 With regard to the requirement of certification by a medical authority, the Court observed that a Chief Medical Officer or other medical authority may certify the percentage and functional aspects of the candidate's disability, but cannot ordinarily be required to certify the educational qualifications of a third-party scribe. The Respondent was therefore advised not to insist upon certification of the scribe's educational credentials by a medical authority and to permit such credentials to be verified by an appropriate competent authority having the requisite ability to undertake such verification.

4.4 With regard to the portal-related grievance, the Court observed that where PwD candidates are recommended through a circular or notification to upload additional documents, the corresponding facility for uploading such documents must be made available on the portal. The Court noted that requiring a candidate to comply with a procedural requirement in the absence of a functional upload facility would amount to *lex non cogit ad impossibilia* (a technical impossibility of performance), and a candidate cannot be penalised for non-compliance with a condition which could not reasonably be fulfilled due to an administrative or technical deficiency on the part of the Respondent. The Court further observed that such technical deadlocks or impossible procedural conditions may adversely affect the candidate's right to reasonable accommodation and accessible examination under Sections 3, 20 and 42 of the RPwD Act, 2016.

4.5 The Court further observed that, as regards the educational qualification of the scribe, Para VI of the DEPwD Office Memorandum dated 29.08.2018 provides that the scribe should have qualification one level below the minimum qualification required for the examination. Accordingly, in the absence of any specific provision to the contrary applicable to the Respondent's examination, the said requirement cannot be set aside at this stage. However, the Respondent may examine the suitability and practical implications of the requirement in the context of its professional examinations while revising its examination guidelines.

4.6 With regard to change of scribes, the Court observed that Para VII of the aforesaid DEPwD Office Memorandum permits a candidate to opt for a change of scribe in case of exigencies such as the scribe falling ill or any other unforeseen circumstance, subject to the prescribed procedure and submission of the requisite documents. Accordingly, the Court observed that candidates should be permitted to arrange an alternate scribe in such circumstances and that the Respondent should facilitate such change in

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accordance with the applicable guidelines without creating unnecessary procedural impediments.

4.7 The Court observed that the examination conducted by the Respondent is a professional/technical qualification examination which may have a bearing upon the career progression and professional benefits of candidates and therefore cannot be treated merely as an ordinary academic examination. The Respondent was accordingly advised to ensure fair and non-discriminatory access to the examination and to provide reasonable accommodation to candidates with disabilities in accordance with the applicable law and guidelines.

4.8 Insofar as the present candidate is concerned, the Court noted that no formal order or communication rejecting or denying his request for a scribe had been issued by the Respondent. It was further noted that the candidate had subsequently uploaded the requisite documents on the portal and that the Respondent had stated during the hearing that the matter was under process. The Court therefore recommended the Respondent to expeditiously verify the documents submitted by Shri Vakamalla Manoranjan Reddy and communicate the approval/confirmation regarding his eligibility to appear in the scheduled examinations.

4.9 The Court further recommended that the present candidate shall not be denied the opportunity to appear in the scheduled examinations merely on account of the initial procedural difficulty in uploading the requisite documents, particularly when the Respondent had not communicated any formal rejection or denial and had acknowledged that the application was under consideration. Upon completion of the requisite verification, the Respondent shall permit the candidate to avail the appropriate scribe facility and appear in the examination without discrimination.

4.10 The Court clarified that, in case any document submitted by the candidate or the proposed scribe is subsequently found to be false, fabricated, manipulated or otherwise invalid, the Respondent shall be at liberty to take appropriate action in accordance with the applicable rules. Such subsequent verification, however, shall not be used as a basis for unnecessarily preventing the candidate from appearing in the examination where the documents have otherwise been duly submitted and are under verification.

4.11 The Court also took note of the Complainant's request regarding provision of screen-reading facilities and observed that examination bodies should endeavour to provide accessible technological alternatives enabling candidates with visual disabilities to undertake examinations independently. The Respondent was advised to examine the feasibility of implementing screen-reading software/facilities and of making arrangements for providing scribes through its own mechanism/service providers, particularly in

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view of the recurring nature of the Respondent's professional examinations.

4.12 In view of the Respondent's categorical assurance that there had been no denial of the candidate's request and that his documents were being processed, and in view of the directions contained herein for expeditious verification and permitting the candidate to appear in the scheduled examinations, the Court observed that no deliberate denial of reasonable accommodation was established in the present case. The Respondent was, however, advised to ensure that the procedural requirements applicable to PwD candidates do not operate as an impediment to their participation in examinations and that the concerns recorded herein are duly considered while revising and implementing its examination procedures. Consequently, the Court has determined no further intervention necessary.

5. The Action Taken Report shall be filed before this Court within a period of 15 days. Accordingly, the case is disposed of.

Yours faithfully,

**(S. Govindaraj)
Commissioner**

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