



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/6547

Dated: 31/08/2026

Case No: DNO/26/CCPD/6547

In the Matter of

Complainant

Shri Vinod Benjamin Rayan

Versus

Respondent(s)

The Chief Executive Officer, Unique Identification Authority of India

1. Background of the Case

1.1 The Complainant, Shri Vinod Benjamin Rayan, a person with 100% visual impairment holding a valid UDID and Aadhaar, submitted a grievance dated 24.07.2026 stating that despite updating his Aadhaar biometrics, his fingerprint authentication consistently fails wherever biometric verification is mandatory. He stated that this has resulted in denial or delay of essential services, including obtaining ration from a Fair Price Shop (July 2026), completing bank KYC (June 2026), and obtaining a telecom SIM connection (January 2026). He further submitted that although iris authentication is an alternative, it is often unavailable at service locations and, due to his severe visual impairment and involuntary eye movements, he also faces difficulty in successfully using iris authentication. He alleged that these repeated authentication failures have caused hardship, mental stress, unnecessary travel, denial of timely services, and loss of dignity. The complainant requested directions to ensure that persons with disabilities are not denied services due to biometric authentication failures and are provided reasonable accommodation through alternative identity verification methods, such as OTP, face authentication, or manual verification, along with appropriate directions to UIDAI, banks, Fair Price Shops, telecom service providers, and other agencies to implement such alternatives.

2. Hearing

2.1. A preliminary hearing was conducted on 04.08.2026 in hybrid mode, wherein the following

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20892275

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parties/representatives were present:

Sl. No.	Name of the Parties / Representatives	On Behalf of
1	Shri Vinod Benjamin Rayan	Complainant
2	Annie Joyce V, DDG, UIDAI RO BENGALURU	Respondent
3	Manoj Kumar, Director, UIDAI RO BENGALURU	Respondent
4	Gulshan Kumar Singh, DD, UIDAI RO BENGALURU	Respondent
5	Shri Pradeep Kumar, SO (Legal), RO (Delhi)	Respondent
6	Shri Deepak Soni, AM (Legal), RO (Delhi)	Respondent
7	Ms. Nida Parveen, AM (Legal), RO (Delhi)	Respondent
8	Mr. Tentu Satyanarayana, DDG Legal Division, UIDAI HO Delhi	Respondent
9	Mr. Sunil Kumar, DD Legal Division	Respondent
10	Mr. Arpit Agrawal, DD Auth Division	Respondent

3. Record of Proceedings

3.1 The representatives of the Unique Identification Authority of India (UIDAI) submitted that the complainant's Aadhaar enrolment had originally been completed in 2013 and no biometric update had been carried out thereafter. Upon receiving notice of the complaint, UIDAI contacted the complainant and offered

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assistance for carrying out a fresh biometric update. It was informed that the complainant had agreed to visit an Aadhaar Seva Kendra on the following day for biometric updation, where officials would assess which, biometric modalities could be successfully captured and would undertake enrolment under the prescribed exception-handling mechanism, including whitelisted enrolment where applicable. UIDAI further submitted that OTP authentication had largely been successful in the complainant's case over the preceding six months, while only fingerprint authentication had consistently failed.

3.2 The respondents further submitted that Aadhaar is voluntary in nature under the Aadhaar Act and that mechanisms already exist to ensure that eligible beneficiaries are not denied government benefits merely because biometric authentication fails. They stated that exception-handling mechanisms permit manual processing where necessary and that several authentication modes, including OTP, fingerprint, iris, and face authentication, are available depending upon the implementing agency. It was further submitted that home enrolment services are already available for persons who are unable to visit Aadhaar centres, including persons with disabilities and senior citizens, and that the complainant had been offered such a facility but had himself opted to visit the Aadhaar Seva Kendra.

3.3 During the proceedings, the Court observed that although Aadhaar is legally described as voluntary, it is practically required for accessing numerous government schemes and services. The Court therefore emphasized that the authentication ecosystem must be user-friendly, accessible, and free from barriers, particularly for persons with disabilities. The Court questioned why a person with disability should be required to travel repeatedly when alternative authentication methods and doorstep services could be made available.

3.4 The Complainant clarified that fingerprint authentication had repeatedly failed during bank KYC, land registration, and other transactions despite earlier biometric updates, thereby preventing him from completing essential formalities.

3.5 The Court further observed that the present complaint should not be viewed as an isolated grievance but as one highlighting a broader systemic concern affecting persons with disabilities and other individuals who experience biometric authentication failures. While appreciating the proactive approach adopted by UIDAI officials in resolving the complainant's individual grievance, the Commission emphasized the need for institutional measures to ensure that such cases do not recur. The Court observed that information regarding doorstep enrolment services, eligibility criteria, and procedures for availing such facilities should be prominently displayed on UIDAI's website and other public platforms so that eligible persons are aware of their entitlements. The Court also observed that deserving persons, including persons with disabilities,

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senior citizens, bedridden individuals, and others facing mobility constraints, should be able to access authentication and enrolment services at their doorstep without unnecessary hardship.

3.6 The Court notes that the Hon'ble Supreme Court in *Pragya Prasun v. Union of India* (30 April 2025) unequivocally held that accessibility is an indispensable component of digital governance and that technological advancement cannot come at the cost of excluding persons with disabilities from essential services. The Supreme Court observed that persons with disabilities possess a statutory right to demand accessibility and reasonable accommodation in digital identity verification processes and directed the respondent authorities to revise digital KYC frameworks with accessibility at their core. The Court further directed that regulated entities establish alternative methods of identity verification, provide mechanisms for human review where automated verification fails, create dedicated grievance redressal systems, and ensure that digital platforms comply with accessibility standards so that no person with disability is denied access to essential services on account of inaccessible technological processes.

3.7 Prima facie, the grievance raised by the complainant appears to extend beyond an isolated instance of authentication failure and raises a broader issue as to whether existing Aadhaar-based authentication practices adequately accommodate persons whose disabilities render conventional biometric modalities unreliable or impracticable. The Court is of the view that possession of a valid identity document should not become illusory merely because a particular biometric modality repeatedly fails, especially where such failure results in denial of essential services affecting food security, banking access, telecommunications, and other civil entitlements.

3.8 The principle of reasonable accommodation requires that where one mode of authentication is demonstrably ineffective for a person with disability, appropriate alternative methods of identity verification should be made available, including such mechanisms as may be permissible under the applicable statutory and regulatory framework, so that the individual is not deprived of statutory or essential services solely due to disability-related barriers.

3.9 Accordingly, the Court recommended the Respondent, UIDAI, to ensure that the complainant's biometric-related issues are resolved through appropriate doorstep or other accessible means at his convenience. The Court further recommended UIDAI to formulate and publicize clear standard norms and eligibility criteria for availing doorstep services, to ensure wider awareness through its public platforms, and to furnish an Action Taken Report within 30 days, including the steps proposed for strengthening accessibility and enhancing the Aadhaar authentication system for persons with disabilities and other deserving individuals. Consequently, the Court has determined no further intervention necessary.

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4. Accordingly, the case is disposed of.

Yours faithfully,

(S. Govindaraj)
Commissioner

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