



Female prisoners in India: Challenges and evolving framework

Raina Godara Mann

Research Scholar, Department of Law, Central University of Haryana, India

Abstract

The incarceration of women in India is a phenomenon that exposes the intersection of gender, poverty, and systemic neglect in the criminal justice system. Though women constitute less than five per cent of the total prison population, their experience is qualitatively different and often more severe than that of their male counterparts. Their imprisonment is marked not only by the deprivation of liberty but also by abandonment from families, custodial violence, poor health facilities, separation from children, lack of legal awareness, and prolonged undertrial detention. The constitutional promise of equality and dignity has repeatedly been undermined within prison walls, requiring continuous intervention by the judiciary to safeguard minimum human rights. The Prisons Act of 1894, still the principal legislation, reflects a colonial approach and is ill-equipped to respond to the special needs of women inmates. Recent efforts such as the Model Prison Manual of 2016, campaigns of the National Legal Services Authority, and judicial pronouncements in cases like Sheela Barse, R.D. Upadhyay, and DK Basu have sought to evolve a gender-sensitive custodial framework. Yet, implementation remains weak, and systemic challenges persist. This article critically examines the condition of female prisoners in India, the constitutional and statutory protections available to them, the role of judicial interventions, and the evolving framework of reforms. Drawing upon constitutional law, statutory analysis, empirical studies, and international standards such as the Bangkok Rules and the Mandela Rules, the article argues for a holistic approach that reimagines incarceration in a manner consistent with human dignity, gender justice, and social.

Keywords: Women prisoners, constitutional rights, human dignity, custodial justice, undertrial detention, prison reforms, legal aid, gender justice, Model Prison Manual, human rights

Introduction

Prisons in every society act as a litmus test of its commitment to human dignity and justice. They are not only sites of punishment but also reflections of the way a nation perceives rights, equality, and reform. In India, the plight of women behind bars is particularly revealing, for it demonstrates how gender intersects with poverty, caste, and social stigma within the criminal justice system. According to the National Crime Records Bureau (NCRB), women constitute less than five per cent of the total prison population in the country, yet their conditions expose the deepest flaws of custodial administration and the absence of gender-sensitive frameworks. The marginalisation of female prisoners has historical antecedents (Chakrabarti *et al.*, 2024)^[1]. The colonial Prisons Act of 1894, which continues to govern prison administration in many respects, was drafted with the male prisoner as its primary subject. Its provisions relating to women were limited to physical separation from men and searches by female staff, offering little recognition of their unique needs or vulnerabilities. Post-Independence reforms have not significantly altered this foundation, and most state prison manuals have continued to replicate a male-centric design, with women treated as exceptions to the norm. This structural neglect has resulted in systemic discrimination, where women inmates must adapt themselves to institutions that were never created for them (Chaudhuri *et al.*, 2023)^[2, 14].

Sociological studies reveal that women prisoners overwhelmingly belong to marginalised social groups Scheduled Castes, Scheduled Tribes, and Other Backward Classes besides being economically impoverished. Many are illiterate or semi-literate, employed in unorganised labour, and often the sole caregivers of children. Their entry into prisons is frequently linked to offences arising out of

poverty, domestic violence, or coercion (Sharma, 2025)^[3]. A study conducted in Eastern Uttar Pradesh highlighted that most female prisoners were either widows, deserted by husbands, or single parents, indicating the social and economic precarity of women in conflict with the law. Offences commonly attributed to women include petty theft, illicit liquor trade, or acting as couriers in drug cases, often under the influence of or in collusion with male relatives. In numerous instances, women are incarcerated for crimes in which their actual participation is minimal, or they are used as scapegoats in family disputes (Balhara *et al.*, 2023)^[4, 13]. The phenomenon of undertrial detention represents one of the gravest injustices within the Indian penal system. Nearly two-thirds of all inmates in India are undertrials, and within this category, women face disproportionate hardship. Bail provisions under the Code of Criminal Procedure, particularly Section 437, require courts to consider the gender of the accused as a factor favouring release (Ranjan, 2025)^[5]. In practice, however, poverty and lack of legal assistance prevent many women from securing bail even for minor offences. Reports from the National Legal Services Authority (NALSA) have documented numerous cases of women who spent years in prison without their trials commencing, in some cases exceeding the maximum possible sentence for the alleged offence. The Supreme Court has repeatedly criticised this reality, calling the prolonged incarceration of undertrial women a blot on the justice system and a violation of Article 21 of the Constitution (Prasad *et al.*, 2024)^[6].

The social consequences of women's imprisonment are particularly severe. Unlike men, women inmates are frequently abandoned by their families and left without support during incarceration. Patriarchal notions of female morality compound the stigma of imprisonment, making

reintegration after release extremely difficult. While male prisoners often continue to be regarded as breadwinners or household heads, women prisoners are perceived as doubly deviant having transgressed both legal and moral codes (Joshi & Srivastava, 2025)^[7]. Rani Dhavan Shankardass has pointed out that women “inside” prisons in India are condemned not merely for violating law but for stepping outside patriarchal roles, which renders their punishment far more isolating than that of men (Verma & Saxena, 2022)^[8]. Perhaps the most disturbing dimension of female incarceration in India is its impact on children. Prison rules allow children up to six years of age to remain with their mothers in jail, a recognition of the importance of maternal care in early childhood. NCRB data records that nearly 1,800 children live in Indian prisons with their mothers (Kumar, 2020)^[9]. Yet conditions for these children remain grossly inadequate, with poor access to nutrition, health care, and education. The Supreme Court in *R.D. Upadhyay v. State of Andhra Pradesh* recognised these challenges and issued detailed guidelines for the care of children in prisons, but compliance remains inconsistent across states (Wagman *et al.*, 2025)^[10]. For children above six, separation from mothers is mandatory, often leading to institutionalisation or placement with distant relatives, disrupting emotional bonds and childhood development.

Everyday prison life for women is characterised by indignities that strike at the heart of constitutional guarantees. Overcrowding is endemic, and women’s wards are rarely prioritised in allocation of space. Sanitary facilities are inadequate, and menstrual hygiene remains a neglected area, with irregular or insufficient supply of sanitary products. Pregnant and lactating women are forced to navigate custodial life with limited medical assistance and poor nutrition. Custodial violence and sexual harassment persist despite safeguards in law, including prohibitions on arrest after sunset and requirements for searches to be conducted by female staff. In *Sheela Barse v. State of Maharashtra*, the Supreme Court intervened to ensure separate lock-ups for women and mandated surprise visits by judicial officers, yet subsequent reports suggest violations remain common (Dar & Sahay, 2018)^[11].

The constitutional framework itself underscores the incompatibility of such conditions with fundamental rights. Article 14 guarantees equality before law, Article 15 prohibits discrimination on grounds including sex, and Article 21 has been expansively interpreted to encompass dignity, privacy, and the right to health. The Directive Principles under Articles 39 and 42 reinforce obligations to protect maternal health and humane working conditions. Read together with India’s commitments under international instruments such as the International Covenant on Civil and Political Rights and the Convention on the Elimination of All Forms of Discrimination Against Women, there exists a normative foundation for gender-sensitive prison administration^[16]. Yet the gulf between these principles and ground reality highlights the failure of state institutions to translate rights into practice (Luca *et al.*, 2019)^[12].

Judicial interventions have often sought to bridge this gulf. In *Upendra Baxi v. State of Uttar Pradesh*, the Supreme Court emphasised that custodial justice is not an act of charity but a constitutional mandate. In *DK Basu v. State of West Bengal*, the Court laid down detailed guidelines on arrest and detention, including medical examinations and rights of the arrested to inform relatives, measures that are

particularly relevant for women. In *R.D. Upadhyay*, the Court reiterated the rights of children living in prisons. These interventions represent the judiciary’s attempt to expand the scope of Article 21 into the prison setting, ensuring that the deprivation of liberty does not extend to the deprivation of dignity (Balhara *et al.*, 2023)^[4, 13].

The introduction of the Model Prison Manual in 2016 sought to consolidate many of these judicial guidelines into an administrative framework, providing for separate enclosures for women, health care for pregnant inmates, and vocational training programmes. Yet the challenge lies in implementation, as prison administration remains a state subject under the Constitution, and compliance varies widely. National campaigns by NALSA have sought to enhance legal aid for women prisoners and address the rights of their children, but these remain pilot initiatives rather than systemic reforms (Chaudhuri *et al.*, 2023)^[2, 14].

The study of women prisoners is therefore not merely an academic exercise but a constitutional and social necessity. Their experiences highlight structural flaws in the penal system, the inadequacy of statutory provisions, and the uneven enforcement of judicial directives. At the same time, they offer a lens to evaluate India’s fidelity to its constitutional values and international commitments. By examining the challenges faced by women inmates and the evolving framework of reforms, this article seeks to contribute to the broader discourse on custodial justice and gender equality. Only when the specific vulnerabilities of women prisoners are recognised and addressed can the promise of justice within Indian prisons move beyond rhetoric to reality (Chakrabarti *et al.*, 2024)^[1].

Constitutional and Statutory Safeguards

The position of female prisoners in India cannot be understood without reference to the constitutional framework that defines the contours of liberty and dignity. At the heart of this framework lies Article 21 of the Constitution, which guarantees that no person shall be deprived of life or personal liberty except according to procedure established by law. The Supreme Court has expanded the meaning of Article 21 to include not merely survival but the right to live with dignity, health, privacy, and humane conditions of existence. These interpretations make it clear that prisoners, despite their incarceration, retain core fundamental rights, and that the State is under an obligation to ensure that conditions within prisons are consistent with constitutional guarantees (Chaudhuri *et al.*, 2023)^[2, 14].

Article 14 provides equality before the law and equal protection of laws, principles that have been used by courts to strike down discriminatory practices in prisons. Article 15 prohibits discrimination on grounds of sex, which has been interpreted to mean that the State cannot deny equal facilities to women prisoners merely because of their minority in numbers (Verma & Saxena, 2022)^[8]. The Directive Principles of State Policy, though non-justiciable, strengthen this framework. Article 39 directs the State to ensure that men and women have the right to an adequate means of livelihood, while Article 42 specifically mandates that provisions be made for securing just and humane conditions of work and for maternity relief. When applied to prisons, these directives require attention to the health, nutrition, and reproductive needs of women, including pregnant inmates and mothers with children (Prasad *et al.*, 2024)^[6].

Despite these constitutional commitments, the legislative framework on prisons remains antiquated. The primary statute is the Prisons Act of 1894, a colonial enactment that reflects nineteenth-century concerns of discipline and security rather than modern principles of rehabilitation and rights. Its provisions concerning women are extremely limited, confined to ensuring that female prisoners are kept apart from men and that their searches are conducted by female officers (Sharma, 2025)^[3]. There is no recognition of the special health, nutritional, or maternal needs of women, nor any reference to education, vocational training, or post-release reintegration. Committees such as the Mulla Committee of the 1980s and the Krishna Iyer Committee of 1987 strongly criticised the Act for being outdated and recommended its replacement with a comprehensive modern statute that foregrounds human rights. Successive governments have considered drafting a new law but have failed to enact comprehensive reform, leaving the field largely governed by state prison manuals that often replicate colonial norms (Joshi & Srivastava, 2025)^[7].

The Code of Criminal Procedure, 1973 incorporates certain gender-sensitive provisions that are of particular relevance to women in custody. Section 46(4) prohibits the arrest of women after sunset and before sunrise, except in exceptional circumstances with prior judicial approval. Section 50A requires the police to inform a friend or relative of the arrested person about her detention, an important safeguard against secret custody. Section 437 directs courts to adopt a liberal approach in granting bail to women, particularly where offences are not punishable with death or life imprisonment. Despite these provisions, violations are widespread. Numerous cases have been documented where women were arrested at night without judicial sanction, or where bail applications were rejected despite the statutory directive. These enforcement gaps reveal the disconnect between progressive legal provisions and ground realities (Ranjan, 2025)^[5].

Judicial Interventions

The judiciary in India has been the most consistent defender of prisoners' rights, particularly those of women, in the absence of comprehensive legislative reform. Courts have relied on constitutional provisions, especially Article 21, to craft safeguards that were either absent in statutes or ignored in practice. Through a series of landmark decisions, the Supreme Court and High Courts have expanded the scope of custodial justice, acknowledged the unique vulnerabilities of women prisoners, and mandated administrative reforms. These judicial interventions not only fill gaps left by the outdated Prisons Act of 1894 but also shape the discourse on human rights in prisons (Balhara *et al.*, 2023)^[4, 13].

One of the earliest interventions came in *Sheela Barse v. State of Maharashtra*, a case initiated through a letter petition by a journalist highlighting the plight of women detainees in police lock-ups. The Supreme Court treated the letter as a writ petition under Article 32 and directed that female suspects be kept in separate lock-ups guarded by female constables, and that interrogation of women should be carried out only in the presence of female officers. The Court also ordered that legal aid be provided promptly to female detainees and emphasised the duty of magistrates to make surprise visits to police lock-ups to prevent abuse. This decision set the tone for judicial activism in custodial matters, demonstrating how procedural innovations could secure substantive rights for women.

In *Upendra Baxi v. State of Uttar Pradesh*, the Court responded to reports of custodial injustices at the Agra Protective Home for Women. It held that prisoners, including women, cannot be treated as mere subjects of executive discretion but are entitled to the full protection of constitutional rights. The Court stressed that the State has an affirmative obligation to ensure conditions of dignity within custodial institutions. The case highlighted the judiciary's willingness to treat even reports of conditions in protective homes as issues of constitutional concern, reinforcing that Article 21 extends to all forms of custody (Chaudhuri *et al.*, 2023)^[2, 14].

The rights of children living with their incarcerated mothers came to judicial attention in *R.D. Upadhyay v. State of Andhra Pradesh*. Here, the Supreme Court considered a petition that raised concerns about the lack of facilities for infants and children in prisons. Recognising that children are innocent victims of their mothers' incarceration, the Court laid down detailed guidelines mandating crèches, nurseries, proper nutrition, medical facilities, and opportunities for education and recreation. It also directed that pregnant women be given proper pre-natal and post-natal care. The judgment was pathbreaking in acknowledging that custodial justice must take into account the rights of children and that imprisonment of mothers cannot translate into the deprivation of basic rights of their offspring.

In *DK Basu v. State of West Bengal*, the Court responded to increasing reports of custodial torture and deaths. It issued a set of eleven guidelines to be followed in all cases of arrest and detention, including the right of the detainee to have a friend or relative informed of the arrest, mandatory medical examination every 48 hours, and preparation of arrest memos countersigned by a relative. These safeguards were later incorporated into statutory amendments of the Code of Criminal Procedure. Though the case was not limited to women, its implications were profound for them, as women are especially vulnerable to abuse in police custody. The insistence on transparency and accountability at the stage of arrest was crucial in addressing gender-based violations.

The judiciary has also intervened in cases of custodial violence against women. In *State of Andhra Pradesh v. Challa Ramakrishna Reddy*, the Supreme Court reiterated that prisoners are not stripped of fundamental rights and that Article 21 continues to apply with full force within prison walls. High Courts, too, have taken cognisance of specific instances of custodial rape and sexual abuse, directing compensation, criminal prosecution of erring officials, and institutional safeguards. These rulings collectively underscore the principle that custodial institutions are under constant constitutional scrutiny and that violations will invite judicial intervention (Ranjan, 2025)^[5].

Another important judicial development concerns the recognition of the right to legal aid. In *Hussainara Khatoun v. State of Bihar*, although not limited to women, the Supreme Court declared that free legal aid and speedy trial are fundamental rights under Article 21. The case exposed the plight of thousands of undertrial prisoners, many of whom were women charged with petty offences but kept in custody for years. The Court's directions led to the release of many such prisoners and laid the foundation for the establishment of institutional legal aid mechanisms under the Legal Services Authorities Act, 1987. For women, who are often illiterate and unaware of their rights, this recognition was particularly significant.

The judiciary has also addressed issues of privacy and dignity for women in custody. In *State of Maharashtra v. Christian Community Welfare Council of India*, the Court considered the issue of women being arrested at night. While Section 46 of the CrPC prohibits arrest of women after sunset, the Court observed that this safeguard must be strictly enforced, and in exceptional cases, arrest at night could only be carried out with prior approval of a magistrate. The decision underscored that the privacy and dignity of women must be preserved at every stage of the criminal process, including arrest and detention (Prasad *et al.*, 2024)^[6].

Apart from these landmark decisions, the judiciary has on several occasions taken suo motu cognisance of media reports or letters concerning women prisoners. High Courts have issued directions for improving conditions of women's prisons, ensuring access to medical care, and providing facilities for vocational training and education. The Supreme Court has also emphasised the need for regular inspections of prisons by district judges, non-official visitors, and human rights commissions, thereby introducing an element of external oversight into otherwise closed institutions.

Challenges Faced by Women Prisoners

The condition of women behind bars in India is shaped by multiple layers of vulnerability. Their small numbers in the overall prison population often become an excuse for systemic neglect, yet their experiences highlight some of the gravest deficiencies in custodial administration. The challenges women face is not confined to the physical environment of prisons but extend to the psychological, social, and legal domains. These challenges can be grouped broadly into issues of custodial violence, overcrowding, health and sanitation, children in prisons, lack of legal aid, stigma and social ostracism, and the problem of post-release reintegration (Joshi & Srivastava, 2025)^[7].

Custodial violence and sexual harassment remain perhaps the most disturbing realities of female incarceration. Despite legal provisions prohibiting the arrest of women after sunset and mandating the presence of female staff during search and interrogation, reports of violations continue to surface. Custodial rape cases, from the infamous Mathura incident in the 1970s to more recent complaints from various states, demonstrate the continuing vulnerability of women to abuse at the hands of police and prison staff. In many instances, women detainees fear reporting abuse due to threats of retaliation or disbelief by authorities. The stigma attached to sexual violence, combined with the disempowerment of incarceration, renders them easy targets. Even where guidelines from Sheela Barse and DK Basu exist, their enforcement remains patchy, often depending on the vigilance of magistrates and human rights bodies rather than institutional safeguards.

Overcrowding is a systemic problem across Indian prisons, and women's wards are no exception. NCRB statistics indicate that occupancy rates in many jails exceed sanctioned capacity by more than 20 to 30 per cent. Since most states lack separate women's prisons, female inmates are confined to small enclosures within male prisons, where space and resources are disproportionately scarce. This results in lack of privacy, poor ventilation, and unhygienic conditions. The Model Prison Manual prescribes separate kitchens, toilets, and medical facilities for women, but

surveys reveal that these provisions remain unimplemented in many institutions. Overcrowding also increases the risk of violence, spreads communicable diseases, and exacerbates stress and anxiety among inmates (Verma & Saxena, 2022)^[8].

Health and sanitation form another area of chronic neglect. Access to sanitary napkins remains irregular in many prisons, forcing women to rely on makeshift alternatives that compromise health and dignity. Pregnant women and lactating mothers face severe difficulties in securing nutritional food, pre-natal and post-natal care, and privacy during childbirth. Reports have documented instances where women gave birth in prison without adequate medical supervision, highlighting the absence of basic maternal health services. Mental health, too, remains largely invisible in custodial policy. The trauma of separation from family, fear of violence, and the stress of trial proceedings contribute to high levels of depression and anxiety among women inmates. Very few prisons provide trained counsellors or psychiatric care, leaving mental health issues unaddressed until they escalate into crises.

Conclusion

The plight of women prisoners in India represents one of the most underexplored yet urgent questions of justice. Their small numbers have rendered them invisible in a system overwhelmingly designed for men, but their incarceration exposes a nexus of gender, poverty, caste, and social marginalisation. The challenges they face custodial violence, overcrowding, inadequate health facilities, neglect of reproductive rights, absence of legal aid, and stigma are not incidental but systemic, arising from structural neglect and outdated laws.

The constitutional framework, anchored in Articles 14, 15, and 21, guarantees equality, non-discrimination, and dignity, but these rights remain largely aspirational in the prison context. Judicial interventions have sought to bridge the gap by issuing guidelines, expanding the jurisprudence of Article 21, and mandating gender-sensitive measures. From Sheela Barse to R.D. Upadhyay, the courts have consistently reaffirmed that women prisoners are entitled to the full protection of fundamental rights. However, judicial activism, while necessary, cannot substitute for legislative and administrative reform.

Committee recommendations, the Model Prison Manual of 2016, campaigns by NALSA, and the oversight of the NHRC represent important steps toward gender-sensitive prison administration. International instruments such as the Bangkok Rules and the Mandela Rules provide valuable standards that align with India's constitutional commitments. Yet implementation remains inconsistent, and women prisoners continue to experience conditions that violate both domestic law and international obligations.

The way forward requires a multi-pronged approach. First, the Prisons Act of 1894 must be replaced by a comprehensive rights-based statute that explicitly recognises the needs of women inmates. Second, independent monitoring mechanisms with binding authority should be established to ensure accountability. Third, investment in infrastructure must create separate facilities for women, including healthcare, vocational training, and childcare. Fourth, non-custodial alternatives should be prioritised for women accused of minor offences, in recognition of their roles as caregivers and the disproportionate impact of

imprisonment on families. Finally, rehabilitation and reintegration must be institutionalised through partnerships between the State and civil society, addressing the stigma and economic vulnerability that accompany release.

Ultimately, the treatment of women prisoners is not simply a question of penal policy but a measure of the State's commitment to justice and equality. By reimagining custodial institutions through a gender-sensitive lens, India can move closer to fulfilling its constitutional promise of dignity and equality for all. The prison must cease to be a site of invisibility and neglect for women and instead become a space where justice, even in its most restrictive form, remains faithful to the principles of humanity.

Reference

1. Chakrabarti S, Christopher A, Scott S, Kishore A, Nguyen PH. Effects of a large-scale alcohol ban on population-level alcohol intake, weight, blood pressure, blood glucose, and domestic violence in India: A quasi-experimental population-based study. *The Lancet Regional Health – Southeast Asia*,2024;26:100427. <https://doi.org/10.1016/j.lansea.2024.100427>
2. Chaudhuri K, Jha N, Nilayamgode M, Suryanarayana, R. Alcohol ban and crime: The ABCs of the Bihar prohibition. *Economic Development and Cultural Change*,2023;72(4):1795–1827. <https://doi.org/10.1086/725452>
3. Sharma G. Compliance and effectiveness of alcohol prohibition: Evidence from India. *Economics of Governance*,2025;26(4):491–526. <https://doi.org/10.1007/s10101-025-00337-z>
4. Balhara YPS, Sarkar S, Singh PK, Chattopadhyay A, Singh S. Impact of three years of prohibition on extent and pattern of alcohol use in Bihar: Observations and insights from the National Family Health Survey. *Asian Journal of Psychiatry*,2023;82:103479. <https://doi.org/10.1016/j.ajp.2023.103479>
5. Ranjan AK. Dry law, deep impact: A micro-sociological study of the alcohol ban in Madhepura, Bihar. *Social Issues and Interdisciplinary Social Sciences Journal*, 2025, 23(7). <https://doi.org/10.62656/SIJSS.v23i7.2274>
6. Prasad S, Verma A, Kumar S, Gupta S. An evaluation of the changing trends in substance use behavior among patients in a tertiary care setting after the implementation of liquor prohibition in Bihar, India: A cross-sectional study. *Cureus*,2024;16(7):63692. <https://doi.org/10.7759/cureus.63692>
7. Joshi S, Srivastava A. Analysis of the liquor ban in Bihar: Legal and ethical impact with special reference to the Indian Constitution. *International Journal of Law Management & Humanities*,2025;8(1):1707–1722. <https://doi.org/10.1000/IJLMH.119045>
8. Verma A, Saxena S. An analysis of liquor ban policy in Bihar and its impact on coalition politics. *International Journal of Early Childhood Special Education*,2022;14(2):4913–4919. https://www.int-jecse.net/media/article_pdfs/4913-4919.pdf
9. Kumar A. Impact of liquor ban on Bihar's economy: Gains and challenges. *Kuey Journal*, 2020, 26(1). <https://doi.org/10.53555/kuey.v26i1.8475>
10. Wagman JA, James KS, Li AHL, Patel P, Raj A. Alcohol use, prohibition policies, and bidirectional intimate partner violence in India. *Alcohol and Alcoholism*, 2025, 60(5). <https://doi.org/10.1093/alcac/agaf045>
11. Dar A, Sahay A. Designing policy in weak states: Unintended consequences of alcohol prohibition in Bihar. In *Proceedings of the Northeast Universities Development Consortium Conference*, 2018. https://barrett.dyson.cornell.edu/NEUDC/paper_586.pdf
12. Luca DL, Owens E, Sharma G. The effectiveness and effects of alcohol regulation: Evidence from India. *IZA Journal of Development and Migration*, 2019, 9(1). <https://doi.org/10.1186/s40176-018-0139-1>
13. Balhara YPS, Sarkar S, Singh PK, Chattopadhyay A, & Singh S. Impact of three years of prohibition on extent and pattern of alcohol use in Bihar: Observations and insights from the National Family Health Survey. *Asian Journal of Psychiatry*,2023;82:103479. <https://doi.org/10.1016/j.ajp.2023.103479>
14. Chaudhuri K, Jha N, Nilayamgode M, Suryanarayana R. Alcohol ban and crime: The ABCs of the Bihar prohibition. *Economic Development and Cultural Change*,2023;72(4):1795–1827. <https://doi.org/10.1086/725452>