
JUDICIAL MONITORING AND NATIONAL LEGAL SERVICES AUTHORITY COMPLIANCE IN ACID ATTACK SURVIVOR PROTECTION

Kumar Shivam, B.A. LL.B. (Hons.), Law College Dehradun, Uttarakhand University,
Dehradun, Uttarakhand, India

Mr. Ashok Dobhal, Assistant Professor, Law College Dehradun, Uttarakhand University,
Dehradun, Uttarakhand, India

ABSTRACT

In India, protections for acid attack survivors are shifting from advocacy to enforcement. This paper examines acid attack law, victim compensation law, the 2016 NALSA framework, the 2018 NALSA compensation scheme, the RPWD Act 2016, select Supreme Court orders, and official incidence data. The 2018 NALSA scheme is a step forward, but existing law also offers some protection. When NALSA is applied, police forward complaints to SLAC and DLAC, and relief can be granted within seven days and up to eight lakhs in serious cases. Survivors of acid attacks are entitled to compensation and fall under the category of limb disability. There is still room for improvement in the law. In March 2023, the Supreme Court ordered bureaucracies to maintain victim records and ensure timely compensation. The court also instructed officials to circulate these orders and disburse funds for late payments. In March 2026, the court expressed concern about the lack of private and state hospital treatment. Parliamentary records show a 207-submission delay and 1240-trial backlog in 2023. This study argues that timely payments, hospital access, rehabilitation, and accountability are crucial.

Keywords: acid attack survivors; judicial monitoring; National Legal Services Authority; victim compensation; rehabilitation

Introduction

Acid attacks hold a very special place in Indian criminal law mainly because of the fact that the violence is at one time both instantaneous and prolonged. The first deed is a chemical assault, but the formal injury lasts legally till the survivors have undergone several surgeries, have their vision impaired have been isolated from the society, have lost work, and have become dependent on public systems, which often function slowly compared to the medical needs of the survivor. This time span explains why usual categories of hurt or grievous hurt turned out to be totally insufficient to serve as the only juridical frame. Once the injury is seen as permanent disfigurement, continuing disability, and the law will be the source of recurring questions that go beyond conviction and sentence.¹

Initially, the legislative measures against the use of acid as a weapon in India were all over the place. Although an offender could be taken to court, there was simply no national system that linked the prosecution of the crime with the offender's minimum payment, the victims' long-term rehabilitation, or the hospitals' immediate supply of medical care (public as well as private) which could be legally enforced. Hence, above court survivors had to fight lawsuits for medical treatment only, for financial compensation only, and for rehabilitation support only as well. The importance of the subsequent Supreme Court's interventions is that they did not see these claims as mere isolated compartments to be dealt with. On the contrary, the Court, step by step, interwove them through a human rights perspective that viewed an acid attack as a failure of governance rather than just a criminal act. "²

That change was critical especially because acid attack cases demonstrate the shortcomings of a justice perception solely centred around a conviction. Even if the criminal case is registered and prosecuted without delay, the survivor still faces the challenge of getting reconstructive treatment, proper nutrition transportation counselling, insecurity of housing, disruption in education, and lack of access to jobs. Therefore, a legal system that merely deals with the punishment will not be able to touch the most lasting harm. Indian law has gradually acknowledged this by bringing acid attack protection into the area where criminal law, social

¹ Meghna Bajpai, Sugandha Singh, "Acid Attack: A Burning Issue in India", 3 *Galgotias Journal of Legal Studies* 1 (2015).; Ratanlal and Dhirajlal, *The Indian Penal Code (In Two Volumes)* 214 (Eastern Book Company, Lucknow, 35th edn., 2021).

² Ratanlal and Dhirajlal, *The Indian Penal Code (In Two Volumes)* 214 (Eastern Book Company, Lucknow, 35th edn., 2021).; Compensation to Acid Attack Victims, *available at*: <https://www.mha.gov.in/en/commoncontent/compensation-acid-attack-victims> (last visited on April 15, 2026).

welfare administration, and constitutional dignity intersect. The jurisprudence arising from this can most accurately be seen as a joint undertaking of restitution, rehabilitation, and institutional compulsion.³

The legal services system is the institutional linchpin of the project today. When the National Legal Services Authority, State Legal Services Authorities, and District Legal Services Authorities were created, they were not primarily seen as the main engines of survivor rehabilitation. However, they have become the central components of the system through their victim compensation powers, which are statutory, and directives from the Supreme Court. They are the ones who get applications or take the initiative, provide interim relief, assess compensation, maintain communication with the police and hospitals, and are becoming more and more the place where delays are noticed. Essentially, the legal services structure has been turned into the link between judicial doctrine and administrative delivery.⁴

So, the Article takes the topic of acid attack law and examines it from the perspective of judicial monitoring. Judicial monitoring here is not a mere rhetorical device, but courts' doctrinal way of keeping cases open, gathering information about the compliance, directing institutional communication, and considering non-payment or non-treatment as matters needing ongoing supervision. This makes a lot of sense in a situation when the damage continues to be experienced for quite a while and formal legal rights can become ineffective due to bureaucratic lethargy. The latest directions in *Acid Survivors Saahas Foundation (Non-Governmental Organisation) v. Union of India* indicate the Supreme Court is increasingly realizing this situation and ready to oversee implementation rather than take it for granted.⁵

The claim put forward in this essay is that the main focus of the doctrine has shifted from recognition to implementation. The primary issue now is not whether law in India recognizes acid attack survivors as rights-holders. It does. The harder question is whether this legal framework can actually enforce timely and tangible institutional performance at a level of States and Union Territories that have different capacities, caseloads, and levels of political

³ Ajita Tandon, "Analysis of the Judicial and Legislative Approach on Acid Attack Survivors in India", 13 *National Law School Journal* 1 (2015).; Ratanlal and Dhirajlal, *The Law of Torts* 118 (Eastern Book Company, Lucknow, 29th edn., 2022).

⁴ Preventive & Strategic Legal Services Schemes, available at: <https://nalsa.gov.in/preventive-strategic-legal-services-schemes/> (last visited on April 17, 2026).; NALSA (Legal Services to Victims of Acid Attack) Scheme, 2016, available at: <https://damananddiu.nalsa.gov.in/scheme/victims-acid-attack-2016/> (last visited on April 16, 2026).

⁵ Order dated March 20, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC); Order dated December 3, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC); Order dated March 24, 2026 in W.P. (Civ.) No. 1252 of 2023 (SC).

attention. According to the latest data, the answer is partially affirmative. The legal framework is strong in terms of norms but weak in terms of administration.⁶

Statutory Framework

The basis for the regime in criminal law is based on the fact that the Indian Penal Code, 1860 considers acid attack and attempt to acid attack as separate offences under Sections 326A and 326B. The significance of these Sections is both doctrinal and symbolic. They acknowledge acid violence to be a significantly different kind of hurt or injury since it results in permanent disfigurement, disability and destruction of the body. Separate codification also affects/decides the setting of evidences/taking of proof and expectation of punishment/sentencing by showing that the law regards the acid attack as a form of targeted aggravated violence on the body. The above led to the recognition/continuation/keeping the same spirit of the act in the post-2023 criminal code transition, which is important because it is a part of the modern penal system/reform that the legislature can be seen as operating in a continuous manner/chain of events instead of viewing it as a one-time legislative event.⁷

Victim compensation law, which offers procedural relief to the above-mentioned offences, is separate from them. Section 357A of the CrPC, 1973 and its equivalent in the Bharatiya Nagarik Suraksha Sanhita, 2023 set up a legislatively empowered way through which victims or their families can be paid compensation through State schemes, regardless of the result of prosecution. Sections 357B and 357C of the CrPC, 1973 are of paramount significance in acid attack cases as they unequivocally announce that victim compensation by the State is over and above the fine imposed on the offender and that hospitals both public and private are bound to provide first aid immediately. These Sections henceforth stop the State from maintaining that the compensation is completely covered by the sentencing and stop hospitals from drifting away a necessity through payment or jurisdiction.⁸

The legal services framework is the administrative mechanism through which these statutory

⁶ Ajita Tandon, "Analysis of the Judicial and Legislative Approach on Acid Attack Survivors in India", 13 *National Law School Journal* 1 (2015).; Acid Attack Jurisprudence in India: Constitutional Promise and Persistent Institutional Failure, *available at*: <https://cjp.org.in/acid-attack-jurisprudence-in-india-constitutional-promise-and-persistent-institutional-failure/> (last visited on April 14, 2026).

⁷ The Indian Penal Code, 1860 (Act 45 of 1860), ss. 326A, 326B; The Bharatiya Nyaya Sanhita, 2023 (45 of 2023), s. 124.

⁸ Code of Criminal Procedure, 1973 (Act 2 of 1974), ss. 357A, 357B, 357C; The Bharatiya Nagarik Suraksha Sanhita, 2023 (46 of 2023), ss. 396, 397.

commitments are intended to be delivered to victims. In 2016, the National Legal Services Authority introduced a separate scheme to provide legal services to victims of acid attacks, and subsequently, a more comprehensive compensation framework was developed under the National Legal Services Authority Compensation Scheme for Women Victims or Survivors of Sexual Assault or other Crimes, 2018. Such mechanisms are significant as they facilitate the survivor's inclusion in a proactive service-delivery system. The framework is not designed to leave survivors to face the criminal justice process alone. It provides for legal aid, informing about first information reports, and a systematic approach to processing interim and final compensation claims.⁹

The new 2018 compensation structure is momentous because it brings in different categories, timetables, and a rehabilitation logic to the law of monetary relief. It does not depict compensation as a mere token payment. On the contrary, it makes a distinction between degrees of injury and disfigurement, it orders quick interim payments, and it says that an award above the usual upper limit can be given in exceptional cases. Besides, the scheme mandates that first information reports pertaining to the crimes listed should be mandatorily shared with the legal service authorities. This is a very important aspect of the design. It lessens the chance that the survivor being compensated will be solely reliant on their personal ability to do the paperwork at a time when they may be experiencing severe physical and mental trauma.¹⁰

Interim relief design is a point worthy of being highlighted separately especially when time is a tangible element of justice in cases of acid attacks. The plan stipulates a directive for interim compensation within a week of the case being brought to the legal services authority, a cheque of rupees one lakh within two weeks and further rupees two lakhs within the subsequent two months, other than any final and bigger award. Those timelines are more than mere administrative targets. They represent medical truths that the survivors are likely to undergo the hospitalization and surgery costs, including dressings medicines transportation, attendants, and nutrition, even before the court proceedings may result in a verdict. Hence, the delay lessens the value of the grant itself.¹¹

Figure 11 below shows the compensation ranges stipulated in the National Legal Services

⁹ *Supra* note 4.

¹⁰ Victim Compensation, *available at*: <https://nalsa.gov.in/victim-compensation/> (last visited on April 18, 2026).

¹¹ *Ibid.*

Authority schedule for acid attack cases. This figure is helpful from an analytical point of view as it illustrates that the central government policy already acknowledges changes in the level of injuries and facial disfigurement. Also, it shows the extent to which the legal minimum has advanced beyond the 3 lakhs figure that was prevalent during the early post-Laxmi times.¹²

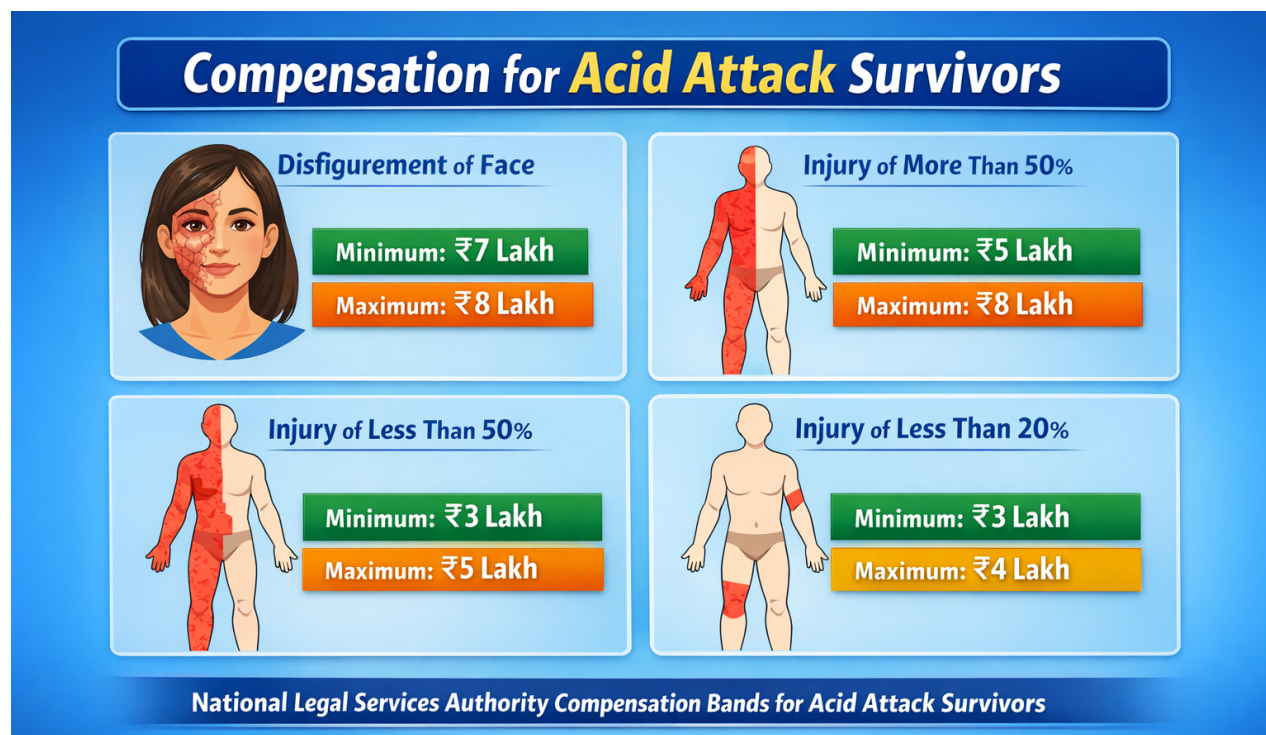


Figure 1. National Legal Services Authority compensation bands for acid attack survivors.¹³

Disability law completes this framework. As per the Rights of Persons with Disabilities Act 2016 acid attack victims have been recognized as persons with specified disabilities. Such a step is highly significant in terms of doctrine as it stops acid attack compensation from being considered as the sole point of the state's liability. When the survivor is additionally placed within the domain of disability law, the state's duties are not limited only to providing certification, social security education employment accommodation, and assistive support but are also extended to broader rehabilitation. The end result is a more precise legal recognition of the survivor's situation as one with continuing impairment and not only a past criminal injury.¹⁴

¹² *Ibid.*

¹³ *Ibid.*

¹⁴ The Rights of Persons with Disabilities Act, 2016 (49 of 2016), s. 2(zc) read with the Schedule.; Order dated March 24, 2026 in W.P. (Civ.) No. 1252 of 2023 (SC).

The regime that emerges from these different sources has a remarkably ambitious agenda on paper. It acknowledges acid attack as a separate crime, makes compensation payable by law, lays down hospital responsibilities, establishes a legal services system and connects survivors with disability-based benefits. However, it is precisely this complexity that makes the implementation difficult. The law does not fail due to the lack of a norm. It fails when several institutions think that only one of them will take the next step. The value of the follow-up by the courts is to hold people accountable to each other in this situation of dispersed responsibility.¹⁵

Foundational Jurisprudence

One cannot overstate the significance of *Laxmi v. Union of India and Others* as the primary case. This lawsuit was pivotal in indicating that acid attack would not only remain as a part of the criminal cases but also become subject to constitutional supervision. In the Supreme Court's order dated 18 July 2013, acid sale regulation was one of the issues raised and survivors were ensured a minimum compensation amount whereas treatment was insisted to be provided free of cost. The follow-up order on 10 April 2015 went even further in emphasising the execution side and indicated that treatment-related obligations also lied with private hospitals. The three of the orders, when viewed in conjunction, accomplished the following: Firstly, they raised acid violence as an issue of systemic governance; secondly, they fixed a minimum monetary limit for the welfare of survivors, and thirdly, they made treatment access a legally enforceable obligation instead of a matter of that charity's discretion.¹⁶

Laxmi v. Union of India and Others is a landmark judgments in terms of revising the state's role and responsibility. Previously, the state response to acid attacks was limited to the criminal aspects of the case after an investigation, and authorities could focus their attention solely on the trial. Post *Laxmi*, such a response was deemed unquestionably inadequate. The state was now expected to address aspects such as regulating the sale of acid, providing emergency medical care, establishing a system for compensation and offering rehabilitation. What is more, the Court's role clarified that the constitutional right to dignity would be meaningless if survivors were left to bear the cost of their own recovery privately. Hence, the Court's decision

¹⁵ Vidhik Kumar, "Acid Attacks in India: A Socio-Legal Report", 6 *Dignity: A Journal on Sexual Exploitation and Violence* 6 (2021).; What Are the Rights a Person Has Under This Law?, available at: <https://nyaaya.org/legal-explainer/what-are-the-rights-a-person-has-under-this-law/> (last visited on April 20, 2026).

¹⁶ Order dated July 18, 2013 in W.P. (Crl.) No. 129 of 2006 (SC); (2014) 4 SCC 427; (2016) 3 SCC 669.

broadened the concept of state responsibility when dealing with a person who has been harmed through violence.¹⁷

Laxmi, however, did not definitively settle the matter of adequacy at the same time. The minimum compensation figure set by the Court was very important as a floor, but if it was taken out of context of the reality of a severe disfigurement and consequent life-long care, it could easily be misinterpreted as an upper limit. This doctrinal tension was more clearly brought to light in *Parivartan Kendra and Another v. Union of India and Others* where the Supreme Court ruled that the compensation for an acid attack cannot be quantified by just giving a formal award. The figure has to be weighed against the survivor's ongoing medical psychological social, and economic losses. In this way, the Court shifted the compensation doctrine from being a symbolic gesture to a justice-centred on rehabilitation interpretation.¹⁸

Parivartan Kendra plays a key role in continuing to fight against turning compensation into a one-time event. The Court pointed out that victims of acid attacks would need ongoing operation and support, and that these victims might face such difficulties that they could impact their education, livelihood, and social participation for years. The judgment also underlined that private hospitals should offer care, thereby strengthening the notion that the duty to treat is embedded in the legal system and is not a matter of one's generosity. From a doctrinal perspective, the case endorses the view that when considering adequacy, one must look at it relationally, taking into account the real rehabilitation needs of the survivor, and not mechanically by referring to an earlier declared minimum.¹⁹

The next major breakthrough in the line was through *Nipun Saxena v. Union of India*. Although the matter before the Court was a wider issue of sexual offences and victim compensation, the Supreme Court's judgment dated 11 May 2018 was directly relevant for acid attack survivors as it resulted in recognising the National Legal Services Authority Compensation Scheme for Women Victims or Survivors of Sexual Assault or other Crimes, 2018. Consequently, this step set a nationally consistent minimum benchmark at the floor level. The Court did not remove federal flexibility but emphasized that States and Union Territories must at least provide the minimum protections as provided in the model scheme. In that sense, the *Nipun Saxena*

¹⁷ (2014) 4 SCC 427; (2016) 3 SCC 669.

¹⁸ (2016) 3 SCC 669; (2016) 3 SCC 571.

¹⁹ (2016) 3 SCC 571.

judgment provided formal, legal standardisation that, till then, had been missing in case law.²⁰

Nipun Saxena's main doctrinal contribution was that it connected judicial power with the administrative setting. The Court, rather than simply resolving one compensation issue after another without altering the system, instructed the National Legal Services Authority to draw up a structured scheme that could function across different regions. This radically changed the extent of the legal reaction. Instead of being limited to occasional changes of state laws or repeated petitions compensation law was provided a uniform pattern for types of injuries, interim relief, and accessibility to procedures. By elevating the legal services organisations to the main role of this scheme, the Court also set the stage for compliance supervision oriented towards the future.²¹

Hence these three rulings are best understood as a chain of events rather than individually. The first move towards constitutional acid attack protection was made by the case of *Laxmi v. Union of India and Others*. *Parivartan Kendra and Another v. Union of India and Others* took a step further and declared that compensation should be in line with the victim's rehabilitation and dignity. *Nipun Saxena v. Union of India* established the administrative floor via the legal services system. The present acid attack monitoring litigation could not stand without this chronology because monitoring by its nature assumes that there is already a sufficiently clear set of normative standards against which one can assess the performance of institutions.²²

This kind of jurisprudence points out that the Supreme Court is not only applying the existing laws but it is also creating the field, linking together the criminal law compensation hospital duty, and rehabilitation, that field of survivor protection. This matters because it goes against any current attempts to reduce acid attack victim's relief to mere executive policy. It has judicially created the field. When that point is accepted, issues of delay, underpayment, or refusal of treatment raised later become questions of whether one has fulfilled one's legal obligations under the law, not questions of whether the administration has been generous.²³

Judicial Monitoring and National Legal Services Authority Compliance

The most important recent event has been the ongoing court case *Acid Survivors Saahas*

²⁰ Order dated May 11, 2018 in W.P. (C) No. 565 of 2012 (SC); Order dated September 5, 2018 in W.P. (C) No. 565 of 2012 (SC).

²¹ *Ibid.*

²² (2014) 4 SCC 427; (2016) 3 SCC 571; Order dated May 11, 2018 in W.P. (C) No. 565 of 2012 (SC).

²³ *Supra* note 3.

Foundation (Non-Governmental Organisation) v. Union of India. The ruling dated 20 March 2025 is quite significant as it went beyond merely reaffirming the principles already laid out in previous cases. It opened a door for enforcement. The Supreme Court has given the petitioner foundation and the acid attack victims the right to seek the intervention of the State or District Legal Services Authority or Legal Services Committee in case of default or delay in the payment of compensation. This step is quite significant from a doctrinal point of view as it changes the legal services bodies from mere adjudicators who decide on the applications to compliance forums that have to take action when the timelines prescribed by the scheme are breached.²⁴

This order is of equal importance due to its emphasis on records. The Court ordered that the concerned legal services bodies should keep charts or records that display the names and details of acid attack victims, the dates on which applications for compensation were filed on their behalf, and the dates on which compensation was actually paid. This instruction alters the legal connotation of compliance. To simply state in general terms that compensation is being released is no longer sufficient for an authority. It should be possible to demonstrate compliance through documentation on a victim-wise basis. From the perspective of public law, the Court changed a problem of entitlement into a problem of audit.²⁵

The part of the 20 March 2025 order dealing with treatment is quite important too. The Court asked the legal services authorities and committees involved to make sure that acid attack victims also get treatment in private hospitals. If there is any problem, the legal services should first talk to the private hospital concerned and, if things cannot be sorted out, they should escalate the matter to the Supreme Court. This ruling comes from the recognition of a practical fact. Sometimes hospital admission depends on the person who can intervene at the spot and not just the abstract legal duty. The Court assigned such a role to the legal services authorities so that the enforcement of treatment could be made operational and not merely normative.²⁶

The case *Acid Survivors Saahas Foundation (Non-Governmental Organisation) v. Union of India* (3 December 2025) reveals why the Court's monitoring should have been extended. The petitioner disclosed that the State and District Legal Services Authorities had in fact not implemented the previous order in the true letter and spirit and also the compensation was not

²⁴ Order dated March 20, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC).

²⁵ *Ibid.*

²⁶ *Ibid.*

given. In reaction to this, the Supreme Court ordered the National Legal Services Authority to pass on the order through the legal services channels and at the same time State authorities and Chief Secretaries were called upon to facilitate the release of funds. Therefore, the Court conceptualized the repeated structural failure: an order for compensation without the subsequent treasury release and the downstream transmission is simply ineffective.²⁷

That December 2025 order also reflected a submission on the part of the National Legal Services Authority that around four hundred and eighty-four crore rupees had been handed out to acid attack survivors during the period from April 2024 to March 2025. The Court however did not take this submission as the conclusion of the matter. On the contrary, it kept the matter open for verification and asked for status reporting. This is an essential aspect of judicial monitoring. Simply citing a large expenditure will not automatically prove that the survivors were at the centre of compliance because such figures do not disclose the distribution of funds, the delay between approval and payment, or whether alongside disbursement, treatment and rehabilitation were provided. Monitoring needs much more detailed information than simply knowing the total amount spent.²⁸

One of the most significant development took place through the order dated 24 March 2026. The Supreme Court, in clear terms, recognised acid assault survivors to be persons suffering from physical disability for the purposes of the Rights of Persons with Disabilities Act, 2016 and remarked that it was a matter of speculation as to whether States and Union Territories had any special scheme for the treatment of acid attack victims in government or private hospitals. So the Court directed the States, Union Territories and the Union Government to find out if such schemes existed and to file them before the Court. This change the focus of the investigation from compensation to medical facilities and from mere monetary compliance to care system.²⁹

Viewed as a whole, the 2025 and 2026 orders depict a sophisticated form of continuing mandamus role of the judiciary. The Court does not simply act on the assumption that a declaration of rights will be self-executing. It leaves the issue open, regulates the gathering of information, points out the specific institutional players, and requires documentary proof. The main idea is not that courts should be the permanent administrators of the law. It is that when

²⁷ Order dated December 3, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC).

²⁸ *Ibid.*

²⁹ *Supra* note 24.

a rights system involves several public actors and delaying the delivery of rights causes irreversible harm to the most vulnerable, then to stop judicial intervention after stating the principle would be equivalent to abandoning the function of the court.³⁰

Monitoring is thus regarded as a remedial necessity rather than a judicial indulgence. Table 2 below places this monitoring turn in the context of the overall situation of reported cases and pendency. It can be inferred from the table that national reporting varied over the period 2019 to 2023 whilst pendency increased constantly. For doctrinal purposes, the importance of this trend is that the possibility of the protection of survivors cannot be concluded solely from registration data. If pendency builds up, the systems of compensation and treatment must become more detached from the rhythm of criminal trials.³¹

Year	Reported acid attack cases	Pending trial acid attack cases
2019	249	820
2020	182	953
2021	176	1,078
2022	202	1,177
2023	207	1,240

Table 1. India-wide reported acid attack cases and pending trials, 2019 to 2023.³²

Judicial monitoring orders on the other hand change the way we should measure the National Legal Services Authority framework. Previously we wondered if there was such a scheme and whether it was designed properly from a normative perspective. Subsequently we asked if legal services authorities could be trusted as consistent points of enforcement. That question is more difficult to answer as it involves looking at manpower, record keeping, communication with hospitals, the capacity to obtain funds and being responsive to the survivors even after issuing

³⁰ *Supra* note 5.

³¹ Ministry of Women and Child Development, "Support Mechanisms for Acid Attack Survivors" (February, 2026).

³² *Ibid.*

the order. In fact, now the attention is not on whether an institution exists but how well it performs.³³

Data, Gaps, and Specific Suggestions

The official parliamentary data statistically indicate that the legal system continues to function despite the occurrence of new cases and an increase in pending cases. According to the Rajya Sabha document submitted in February 2026, the total number of acid attack cases reported across India under Section 326A of the Indian Penal Code was 249 in 2019, 182 in 2020, 176 in 2021, 202 in 2022, and 207 in 2023, whereas the number of cases pending for trial increased from 820 in 2019 to 1,240 in 2023. This data is significant because it shows that changes in the yearly number of reported cases do not result in a lesser burden on the system. Hence, the compensation and treatment mechanism needs to be capable of operating effectively even when there is a persistent backlog and the prosecutorial process takes a long time.³⁴

The parliamentary annexure also exposes a striking geographic concentration of reported cases. West Bengal and Uttar Pradesh together make up a very large proportion of the reported acid attacks cases in the country, while Gujarat Odisha Rajasthan Assam Haryana, and Kerala comprise a second tier of the higher-reporting States. This geographic concentration is important in a compliance context, as a nationally uniform scheme on paper is bound to face very different administrative challenges in different States. A State with higher levels of reporting, pending matters, and greater distances between district-level institutions may well be experiencing the most severe bottlenecks in the processing of compensation and coordination of medical services. So, monitoring should be geographically aware rather than formally indifferent to scale.³⁵

Table 2 depicts that concentration, in a simplified manner, through the highest-reporting States in the year 2023. A graphical display of this table, either in the form of a bar chart or a proportional chart, would make clear that a national policy is implemented through uneven local caseloads. Therefore, the law on judicial monitoring, should be interpreted in a federal context: the very same legal mandate may call for widely differing implementation strategies

³³ Order dated March 20, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC); Order dated December 3, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC); Order dated March 24, 2026 in W.P. (Civ.) No. 1252 of 2023 (SC).; Victim Compensation, *available at*: <https://nalsa.gov.in/victim-compensation/> (last visited on April 18, 2026).

³⁴ *Supra* note 24.

³⁵ *Ibid.*

across different States.³⁶

State	Reported acid attack cases in 2023
West Bengal	57
Uttar Pradesh	31
Gujarat	15
Odisha	11
Rajasthan	11
Assam	10
Haryana	10
Kerala	10

Table 2. Highest-reporting States for acid attack cases in 2023.³⁷

The Punjab and Haryana High Court decision on *Harwinder Singh v. State of Punjab and Others* position on compensation and pensionary assistance for female victims of acid attacks is a case in point. The Court disagreed with the administrative interpretation that was sought to be limited to only women acid victims. The Court's decision was that a male acid victim should also be entitled to such benefits without discrimination. This is a very significant case because it reveals that even after the general principles have been agreed upon, the implementation can still be skewed by the departmental interpretation of the schemes. The case is also a reminder that, although most of the acid victims are women, a legal mechanism for survivors must both in concept and in practice be inclusive and non-discriminatory.³⁸

Recent rulings from the High Court also indicate that the problem of adequacy remains, even if the victim has been given some compensation. For instance, in the case of *Shiney T K v. District Legal Services Authority of Kottayam*, the Kerala High Court was confronted with a

³⁶ *Ibid.*

³⁷ *Ibid.*

³⁸ CWP-9053-2026, decided on March 25, 2026 (P&H HC).

victim who was paid the older fixed minimum amount but was still suffering from very serious facial disfigurement, losing sight of one eye, being unable to work and a further treatment plan involving several surgeries. The Court ordered an additional interim amount of five lakh rupees. What makes this ruling stand out is that it, on a practical level, acknowledges that past minimums do not fully satisfy the state's obligation when the court is presented with continuous treatment, disability, and the loss of livelihood in very real terms.³⁹

Data and case studies highlight three major areas where compliance is lacking. The first of these gaps concerns time: compensation may be documented but reach the victim too late when their health situation has changed drastically. The second is a language issue: instructions given by courts at the central level do not always reach the various State departments treasuries hospitals, and district-level legal services offices in an understandable and actionable way. Lastly, there is a lack of ongoing support: even when the money is made available, forms of assistance such as disability certification, psychological counselling, vocational training, and regular follow-up are still not provided regularly. These issues do not stand alone; a problem in one area generally leads to the failure of the others.⁴⁰

Conclusion

The pattern of changes in acid attack jurisprudence in India clearly demonstrates the journey from only acknowledgment to ensuring compliance. The initial step which is the *Laxmi v. Union of India and Others* case pointed out that acid attacks needed separate laws, fixed minimum compensation, and binding treatment time to be implemented. The second phase represented through the cases *Parivartan Kendra and Another v. Union of India and Others* and *Nipun Saxena v. Union of India*, introduced the concepts of sufficiency, rehabilitation, and national unification via the legal aid system. The current phase most notably shown by *Acid Survivors Saahas Foundation (Non-Governmental Organisation) v. Union of India*, is focused on whether the officials are capable of showing that these commitments are being met both in time and in substance.⁴¹

The legal analysis presented in this study highlights that the National Legal Services Authority

³⁹ WP(Crl.) No. 690 of 2023, decided on December 1, 2025, 2025:KER:92650.

⁴⁰ CWP-9053-2026, decided on March 25, 2026 (P&H HC); WP(Crl.) No. 690 of 2023, decided on December 1, 2025, 2025:KER:92650.; NALSA (Legal Services to Victims of Acid Attack) Scheme, 2016, *available at*: <https://damananddiu.nalsa.gov.in/scheme/victims-acid-attack-2016/> (last visited on April 16, 2026).

⁴¹ (2014) 4 SCC 427; (2016) 3 SCC 571; Order dated May 11, 2018 in W.P. (C) No. 565 of 2012 (SC); Order dated March 20, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC).

(NALSA) framework is mandatory but not sufficient. It is mandatory as it is the only national level legally recognized channel available for linking compensation, legal services and some form of administrative follow-up. At the same time it is not sufficient because the effectiveness of the framework hinges on releasing funds by the treasury, recording at district level, having hospital staff that respond to the needs of the disabled, and integrating with the systems of disability and rehabilitation in a meaningful manner. Hence, the recent Supreme Court orders cannot be seen as mere additions to the Law, rather they constitute a major part of the Law's working in practice. In fact, judicial orders for the recording and reporting of disability status have become, in some ways, the only source of linking the legal provision of rights with their realization.⁴²

The data published by the official sources support this finding. The national-level reporting hasn't ceased, the overall backlog has increased, and the geographical distribution of cases remains quite uneven. Under these circumstances, compliance cannot simply be inferred from the mere existence of lawful provisions or from overall expenditure figures. It needs to be proven through victim-wise chronological order, the punctual payment of every instalment, the uninterrupted provision of medical treatment, and proof that the survivors have not been left to figure out on their own the interaction with different and disconnected bureaucracies. To put it simply, the acid attack protection in India going forward will not be more reliant on the introduction of new rights but rather on the procedural disciplining of the very institutions that have been entrusted with the implementation of the existing ones.⁴³

The major takeaway is therefore quite clear. Indian law in this area is no longer lacking in principles. What it lacks is conversion, i.e. Conversion of judicial orders to regularised administrative conduct. Judicial oversight has become the medium that connects the two. If the records, timelines, and institutional routes required by the courts become the stable practice, the legal system may shift from the occasional rescue to the dependable survivor protection. Otherwise, even the most advanced doctrinal framework will keep producing erratic justice for the very individuals it is most urgently designed to protect.⁴⁴

⁴² Victim Compensation, *available at*: <https://nalsa.gov.in/victim-compensation/> (last visited on April 18, 2026).; Order dated March 24, 2026 in W.P. (Civ.) No. 1252 of 2023 (SC).

⁴³ *Supra* note 24.

⁴⁴ Ajita Tandon, "Analysis of the Judicial and Legislative Approach on Acid Attack Survivors in India", 13 *National Law School Journal* 1 (2015).; Order dated March 20, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC); Order dated December 3, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC); Order dated March 24, 2026 in W.P. (Civ.) No. 1252 of 2023 (SC).

Suggestions

The measures below are directly in line with the Article's examination of judicial monitoring, compensation delivery, treatment access, and legal-services accountability.⁴⁵

1. Auto-forward every acid-attack FIR to the DLSA within two hours: The 2018 NALSA scheme requires immediate FIR sharing so that the SLSA or DLSA can start interim-compensation processing even if the survivor has not come up with a separate application. Every State should connect the FIR software used by police with an SLSA/DLSA portal and should have a visible transfer timestamp in the file of the survivor so that the delay can be pinpointed to the exact police station and the date.⁴⁶
2. Issue a T+7, T+15, and T+60 compliance certificate in every case: Since the scheme determines a 7-day deadline to issue an interim order, 15 days for the payment of the first 100,000 rupees, and 2 months for the next 200,000 rupees, the DLSA will have to prepare three signed deadline certificates for each survivor file. In case any certificate is not available, the case should automatically be raised on the same day to the Member Secretary of the SLSA and the State Finance Department.⁴⁷
3. Upload the Supreme Court chart in anonymised monthly form: The Court's March 2025 order mandates State and District Legal Services Authorities to keep victim-wise records/chart indicating the date of application to compensation and the date of payment. By the 15th of every month, each SLSA should release a version of the district dashboard without the names of the victims, displaying total pending acid attack files, files overdue beyond 15 days, files overdue beyond 60 days, and the district officer responsible.⁴⁸
4. Create an acid-attack sub-ledger inside the compensation fund: The NALSA compensation model stipulates that there must be a dedicated bank account within the women's victims compensation fund. Indeed, Parliament has affirmed that all States

⁴⁵ Victim Compensation, *available at*: <https://nalsa.gov.in/victim-compensation/> (last visited on April 18, 2026).; Preventive & Strategic Legal Services Schemes, *available at*: <https://nalsa.gov.in/preventive-strategic-legal-services-schemes/> (last visited on April 17, 2026).

⁴⁶ *Supra* note 10.

⁴⁷ *Supra* note 10, ss. 357A, 357B, 357C; The Bharatiya Nagarik Suraksha Sanhita, 2023 (46 of 2023), ss. 396, 397.

⁴⁸ *Supra* note 24.

and UTs have compensation schemes. States should thus open a separate acid-attack ledger in that account, keep acid attack awards at a minimum quarterly rolling balance, and have their balance cross-checked by both the Finance Department and the SLSA before the quarter ends.⁴⁹

5. Empanel named private hospitals division-wise within 30 days: Considering the legal services authorities, the Supreme Court has already mandated them that acid attack survivors should be provided with medical treatment in private hospitals. Moreover, in March 2026, it was highlighted that there was a lack of clarity whether States even had treatment schemes dedicated to such cases. Each State should publish the details of at least one empanelled reconstructive-surgery hospital and one ophthalmic hospital for each administrative division along with a 24-hour nodal officer number which should be present on every DLSA survivor notice.⁵⁰
6. Open legal-services clinics inside burn and reconstructive units: The 2016 NALSA legal-services framework for acid-attack survivors proposes setting up legal services clinics running on hospital premises and lawyers on panel, and PLVs to assist survivors in getting treatment, certificates, and compensation. Each SLSA should deploy one PLV and one panel lawyer per government burn unit and per empanelled private burn hospital, so that the first-treatment certificate, compensation form, and legal-aid request can be completed before discharge.⁵¹
7. Bundle disability certification with the first compensation order: The RPwD Act has recognized acid attack victims as people with disabilities under specified categories, and the Supreme Court reaffirmed this position in a March 2026, while also linking it to treatment and rehabilitation issues. The DLSA should thus forward the survivor's medical papers to the district disability board within seven days of the interim order and note the certificate number, or the reason for non-issuance, in that same compensation chart used for court monitoring.⁵²

⁴⁹ *Supra* note 10.

⁵⁰ Order dated March 20, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC).; Order dated December 3, 2025 in W.P. (Civ.) No. 1252 of 2023 (SC).

⁵¹ NALSA (Legal Services to Victims of Acid Attack) Scheme, 2016, *available at*: <https://damananddiu.nalsa.gov.in/scheme/victims-acid-attack-2016/> (last visited on April 16, 2026).

⁵² *Supra* note 16.

8. Run quarterly special audits in West Bengal and Uttar Pradesh first: Parliamentary data for 2023 reveal West Bengal as the State with 57 recorded injuries by acid throwing and Uttar Pradesh with 31 out of the 207 total cases registered across India and subjecting 1,240 trials to be pending after. So, firstly NALSA should take up State-specific quarterly audits in these two States and this model should then be extended to Gujarat Odisha Rajasthan Assam Haryana, and Kerala, instead of relying on one national average for the compliance.⁵³.
9. Replace aggregate spending claims with victim-wise status annexures: The Supreme Court in December 2025 made a note of a submission mentioning that approximately 484 crore were distributed during the financial year 2024-25 but such aggregate figures do not disclose whether individual survivors were given the money timely. All future affidavits filed in the pending Supreme Court case should include a case-wise chart indicating the date of FIR, date of DLSA intimation, date of interim-order, dates of tranche-payment, hospital referrals, and current rehabilitation situation.⁵⁴.
10. Impose a 72-hour treasury release rule after SLISA sanction: The involvement of Chief Secretaries had to be ordered in December 2025 since the compensation amount approved was still not reliably reaching the survivors. It should be mandatory for each State to issue a finance circular that considers the sanctioning of acid-attack compensation as priority for e-payments, with the treasury transaction ID being communicated to the Member Secretary of the SLISA and kept for presentation in the Supreme Court in case a delay complaint is filed.⁵⁵.

⁵³ *Supra* note 24.

⁵⁴ *Supra* note 26.

⁵⁵ *Ibid.*