
JUDICIAL INTERVENTION IN INDIA'S STUDENT SUICIDE CRISIS

Nabiha Ansari, University Institute of Legal Studies

ABSTRACT

The landmark judgment in *Sukdeb Saha v. State of Andhra Pradesh* (2025) marks a transformative shift in Indian jurisprudence by elevating student mental health from a statutory provision to a Fundamental Right under Article 21 of the Constitution. Prompted by the tragic death of a 17-year-old NEET aspirant and the broader "suicide epidemic" claiming over 13,000 student lives annually, the Supreme Court moved beyond traditional legal frameworks to address the "structural violence" inherent in the modern education system.

The Court's ruling dismantles the "merit-at-all-costs" culture by issuing the binding "Saha Guidelines," which impose a proactive "Duty of Care" on both formal schools and the previously unregulated coaching industry. Key mandates include the compulsory appointment of trained counselors, the prohibition of performance-based batch segregation, and the elimination of public shaming practices. By framing student suicides as institutional failures rather than individual weaknesses, the judiciary has created a mechanism for strict liability and institutional accountability. While challenges regarding resource gaps and legislative formalization remain, the judgment serves as a moral and legal corrective, asserting that the right to a dignified life is inseparable from a safe, supportive, and psychologically healthy learning environment.

Keywords: Article 21, Student Mental Health, Saha Guidelines, Structural Violence, Institutional Accountability.

CASE COMMENT:

SUKDEB SAHA V. STATE OF ANDHRA PRADESH &ORS.

Written by Nabiha Ansari

3rd year of 5 Year L.L.B. Student, University Institute of Legal Studies, Punjab University, Chandigarh

I. CITATION:

SPL(Crl.) No(s). 6378 of 2024 or 2025 INSC 893

II. BENCH:

Justice Vikram Nath & Justice Sandeep Mehta

III. INTRODUCTION:

In a significant judicial reflection, the Supreme Court of India has addressed a deepening generational crisis: the alarming rise of student suicides within the contemporary education system. This issue is not merely a legal or statistical concern but a moral and institutional one that demands urgent collective introspection.¹

Historically, education was envisioned as a means for holistic development—intellectual, emotional, ethical, and spiritual. Philosophers like Jean-Jacques Rousseau emphasized that education must adapt to the developmental needs of the child, cultivating reason and emotional well-being. Similarly, Jiddu Krishnamurti noted that the function of education is to create integrated, intelligent human beings, free from the conditioning of fear, competition, or compulsion. True success lies not in rankings, but in the growth of a person capable of living with dignity and purpose.

However, the modern academic environment has distorted these ideals, subjecting students to relentless psychological pressure. Education is increasingly perceived as a "high-stakes race"

¹ Political Science Solutions “ Supreme Court Issues Comprehensive Guidelines to Tackle Student Suicides And Mental Health Crisis in India’s Educational Institutions, updated on 29th July 2025, available at www.politicalsciencesolutions.com , (last visited on 28th Dec 2025)

toward narrow goals of status and economic security. The joy of learning has been replaced by anxiety over results, rewarding conformity over curiosity and endurance over well-being. In this paradigm, failure is seen not as part of growth but as a devastating end.

This "systemic malaise" is reflected in harrowing statistics: India recorded 13,044 student suicides in 2022 alone, with over 2,000 directly attributed to examination failure. The Court describes this as a "suicide epidemic," exacerbated by isolation, unrealistic expectations, and a culture of silence around mental health. Ultimately, the Court emphasizes that student mental health must be protected through a preventive and supportive framework across all educational institutions.²

IV. FACTS:

In May 2022, the appellant's 17-year-old daughter, Ms. X, enrolled in Aakash Byju's Institute in Visakhapatnam to prepare for the NEET examination.³ Following the institute's recommendation, she stayed at Sadhana Ladies Hostel while attending Achiever's Junior College for her Class XII studies. On July 14, 2023, the appellant was informed by the institute's Assistant Branch Manager that Ms. X had sustained severe injuries after falling from the hostel's third floor around 10:20 pm. She was initially taken to Venkataramana Hospital, where a friend found her conscious and speaking early the next morning. However, by the time the appellant arrived that afternoon, she was unconscious and on a ventilator. Hospital management claimed she suffered a heart attack at 4:00 am but lacked specialized faculty for treatment. Dissatisfied, the appellant moved her to Care Hospital, where she passed away on July 16, 2023. An FIR was initially registered under Section 174 CrPC. Alleging murder and conspiracy, the appellant later filed a formal FIR in Kolkata on August 20, 2023. Subsequently, Andhra Pradesh police filed an "Alteration Memo" to apply Section 304 Part-II of the IPC against the hostel warden, owner, and institute managers.

V. ISSUES:

The primary issue before the Supreme Court was whether the investigation into the unnatural death of the appellant's 17-year-old daughter, Ms. X, should be transferred from the local

² Sukdeb Saha v. State of Andhra Pradesh & Ors. SPL(Crl.) No(s). 6378 of 2024,

³ Supreme Court Observer, Mental Health Integral Component of Right to Life, available at www.scobserver.com (last visited on 28th Dec 2025)

police to the Central Bureau of Investigation (CBI). The appellant challenged a High Court order that rejected this transfer, alleging that the local investigation was perfunctory, arbitrary, and aimed at shielding influential institutions, including a prominent coaching center and a private hospital. Key points of contention included significant discrepancies in CCTV footage regarding the deceased's clothing, procedural lapses such as the failure to record the deceased's statement while she was conscious, and the withholding of vital forensic reports. While the core legal question concerned the transfer of investigation, the Court also addressed the broader systemic crisis of student suicides in India, eventually issuing national guidelines for student mental health.

VI. RULE OF LAW:

The Supreme Court of India fundamentally reframed student mental health by elevating it to a Constitutional Right under Article 21. By expanding the "Right to Life" to include a life of dignity, autonomy, and psychological well-being⁴, the Court moved beyond the mere statutory protections of the Mental Healthcare Act, 2017, making mental health an enforceable fundamental right against both the State and private institutions. A central pillar of this ruling is the introduction of the criminological concept of "Structural Violence," as proposed by Johan Galtung.⁵ The Court argued that student suicides should not be viewed as isolated private tragedies, but rather as a result of systemic neglect, toxic educational pressures, and harmful institutional practices like public shaming. This radical shift holds educational bodies morally and legally accountable for the environments they foster.⁶

To address these systemic failures, the Court invoked its extraordinary powers under Articles 141 and 32 to issue the "Saha Guidelines,"⁷ which serve as a binding interim framework until Parliament enacts specific legislation. These mandates include the compulsory appointment of trained counselors in institutions with over 100 students, the prohibition of high-pressure academic practices, the establishment of confidential grievance systems, and mandatory psychological first-aid training for staff. While this judgment marks a transformative step in destigmatizing mental health and creating a "Duty of Care" for the previously unregulated

⁴ The Constitution of India, art.21

⁵ Johan Galtung, "Violence, Peace, and Peace Research", 6(3) *Journal of Peace Research* 167-191(1969)

⁶ Mili Gupta & Bodhisattwa som, "Beyond Madness of Marks And metrics: Recognition of Mental health as a Constitutional Right", updated on 24th Oct 2025, available at www.lawlive.com, (last visited on 28th Dec 2025)

⁷ Swati Charturvedi, "Reframing Student Mental Health:The Saha Mandate", *The Hindu*, Sept.16, 2025, available at www.thehindu.com (last visited on 28th Dec. 2025)

coaching sector, it also presents significant implementation challenges. Critics and legal scholars note that the lack of qualified professionals in rural areas and the substantial budgetary requirements for infrastructure and training remain major hurdles.⁸ Ultimately, while the Saha judgment provides a powerful legal shield for students, its long-term success depends on adequate state funding and the eventual passage of a comprehensive parliamentary act.

VII. CRITICAL COMMENTARY:

In light of the *Sukdeb Saha v. State of Andhra Pradesh* (2025) judgment, the legal landscape surrounding student welfare has shifted from a discretionary benefit to a non-negotiable constitutional mandate. Below is a critical analysis of the judgment's impact through a law student's lens.⁹

The Constitutional Evolution of Mental Health

The legal significance of this judgment lies in its expansion of the Right to Life under Article 21.¹⁰ By elevating mental health to a Fundamental Right, the Court has moved beyond the mere provision of medical services. It now recognizes that a "dignified life"¹¹ is impossible in an environment of constant psychological trauma. This provides a stronger legal basis for students and parents to seek judicial remedies. However, a potential critique remains: these guidelines are essentially interim judicial measures. While they carry the weight of law under Article 141, they cannot substitute for a comprehensive Parliamentary Act. A dedicated statute is required to address long-term sustainability, jurisdictional nuances, and the specific nuances of the digital learning era.

Social Destigmatization and the Myth of Resilience

From a social perspective, the judgment serves as a powerful corrective to the "merit-at-all-costs" culture. It frames student distress not as a personal weakness or a lack of resilience, but as a systemic failure. By mandating the end of public ranking and batch segregation, the Court is attempting to dismantle the "shame-based" pedagogy prevalent in Indian competitive education. The primary challenge here is the massive resource-personnel gap. Destigmatizing

⁸ Editorial, "Constitutionalizing Mental Health", *SCC Online Blog*, July 26, 2025, available at www.scconline.com (last visited on 28th Dec2025)

⁹ *Sukdeb Saha* judgement, *supra* note 1.

¹⁰ The Constitution of India, art.21

¹¹ *Shatrugan Chauhan v. Union of India* (2014) 3 SCC 1.

mental health creates a surge in demand for help, yet India suffers from a chronic shortage of qualified clinical psychologists and counsellors. In rural or smaller institutions, there is a risk that "counseling" may be relegated to untrained staff, which could inadvertently cause more harm than good.

Institutional "Duty of Care" and the Coaching Sector¹²

The judgment's most aggressive move is the creation of a formal Duty of Care for the previously unregulated coaching industry. By holding these institutions to the same standards as universities, the Court has closed a significant legal loophole. This imposes a "strict liability" on institutions to ensure the psychological safety of their students. Nevertheless, this mandate faces the hurdle of Budgetary and Resource Constraints. Implementing round-the-clock helplines, infrastructure for recreational breaks, and hiring professional staff requires significant capital. Without a clear directive on State funding or subsidies, there is a legitimate concern that smaller, affordable institutions may be forced to shut down, or alternatively, that the cost of these mandates will be passed on to students, making education even less accessible to the marginalized.

ASPECT	PRE- SUKDEB SAHA ERA	POST SUKDEB SAHA MANDATED
Legal basis	Statutory (Mental Healthcare Act 2017)	Constitutional (Article 21 Fundamental Right)
Accountability	Individual/ Personal Responsibility	Institutional Culpability / Structural Failure
Applicability	Limited to Formal Universities	Extended to Private Coaching Centres
Remedy	Administrative Complaints	Constitutional writ Jurisdiction

¹² Mental Health Act, 2017 (Act 10 of 2017)

VIII. CONCLUSION:

In this landmark judgement¹³, the Supreme Court of India fundamentally redefined the scope of Article 21, elevating mental health from a statutory privilege under the Mental Healthcare Act, 2017¹⁴, to an inalienable fundamental right. By declaring that the "Right to Life" is hollow without the "Right to Mental Well-being," the Court imposed a proactive positive duty of care on all educational institutions, including the largely unregulated coaching industry.

The judgment introduced the binding "Saha Guidelines," which mandate systemic reforms to dismantle what the Court termed "structural violence" within the education system. Key directives include the compulsory appointment of trained counselors (at a 1:100 ratio for large institutions), a strict prohibition on batch segregation based on academic performance, and the elimination of public shaming practices. Furthermore, the Court ordered the creation of District-level Monitoring Committees to ensure that schools and coaching centers in high-pressure hubs like Kota and Visakhapatnam implement these safeguards. By framing student suicides not as individual failures but as "institutional culpability," the judiciary has signaled that the lack of a support system is now a constitutional breach. Ultimately, the Sukdeb Saha verdict serves as a transformative mandate, shifting the burden of student well-being from the shoulders of the youth to the conscience of the State and its institutions.

¹³ Sukdeb Saha judgement, supra note 1.

¹⁴ Supra note 11.