



INTERNATIONAL LAW  
JOURNAL

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**WHITE BLACK  
LEGAL LAW  
JOURNAL**  
**ISSN: 2581-  
8503**

**Peer - Reviewed & Refereed Journal**

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

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WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal providededicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

# **OPEN PRISONS IN INDIA: A PATHWAY TO REFORM, REHABILITATION AND REINTEGRATION AND CHALLENGES**

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## **1. Abstract:**

In recent years, the idea of open prisons or correctional facilities has gained popularity as a possible remedy for the issues faced by the conventional prison system. This study intends to investigate the potential advantages, legal frameworks, and socioeconomic ramifications of open prisons to assess their necessity and feasibility in India. To address the problem of acute overcrowding, encourage rehabilitation, and lower recidivism rates, this research study aims to present a thorough examination of India's need for open prisons. To overcome the related obstacles, their implementation must be supported by supporting policies and a robust regulatory environment. Open prisons can be essential to enable offender's rehabilitation and reintegration as the nation transitions to a more progressive criminal justice system. The effectiveness of India's open prison systems can be enhanced and refined with more research in this field. In India, open prisons signify a gradual transition away from punitive incarceration and toward a paradigm that is both rehabilitative and corrective. With an emphasis on self-discipline and low levels of security, these facilities seek to address long-standing problems with the Indian prison system, particularly recidivism and overcrowding. This essay places open prisons in India within larger discussions on restorative justice and prison reform by examining their history, legal framework, operations, advantages, difficulties, and prospects for the future.

**Keywords:** Open prison, Reintegration, Rehabilitation, Reformatory, Correctional Facilities.

## **2. Research Methodology:**

A qualitative methodology is used in this research paper by analyzing the academic publications, court rulings, and legal documents. A doctrinal study of the pertinent constitutional provisions, government agency data, and other interpretations are also included.



By establishing these goals and specifying this scope, the paper hopes to contribute to both scholarly discourse and practical legal understanding by offering a comprehensive and nuanced understanding of the intricate relationship between societal interest to keep a accused in prison tenets of reformatory theory under which the concepts of open prisons are discussed.

### **3. Introduction:**

Despite nearly two centuries of penological reform and conjecture, dating back to Beccarius and John Haward, the Open Jail, commonly called a prison without bars, has been a late development within the prison system. This is because jails have traditionally served as safe havens for criminals, and this confinement purpose has not changed. In this context, containment refers to both the need to keep inmates out of society and to make sure that their actions, even while they are behind bars, do not escalate to the point where they endanger public peace.

The aim of the formation of Open Prisons in India is based upon the question of why a criminal is imprisoned and the objectives of imprisonment and thereby of Prison. The criminal is a person against whom the crime is proven. Crime constitutes a breach of legal statutes occurring at a specific location and moment. From a purely sociological perspective, devoid of any considerations of sin, immorality, or the severity of the offense, crime can be understood as the inability of the individual to conform to the social environment in which they exist. The objective of prisons in India is based on the theory of (1) Retribution, (2) Retaliation, (3) Penitence, (4) Neutralization, (5) Vindication, (6) Deterrence, (7) General Deterrence, (8) Special Deterrence (9) Removal from Society (10) Rehabilitation (11) Re- socialization (12) Protection of Criminal from Society (Sahay, G. B., 1977).

Isolating inmates who have been deemed refractory and a menace to social order is the mandate assigned to the prison system. Therefore, in India, the primary function of prisons is custodial. The Community's jail mission has placed an increasing focus in recent years on the need to treat and rehabilitate prisoners using modern social work and psychiatric techniques. The goals supplement the prison's custodial aim, but they are not meant to take its place. The structure of the prison system strikes an awkward equilibrium between the several purposes for which it was created.



The Indian prison system is beset by critical challenges, including acute congestion, substandard infrastructure facilities, and insufficient staffing. As per the data published by National Crime Records Bureau (NCRB), prisons across the country are operating at an average occupancy rate exceeding 117%, with some states reporting rates as high as 176% (Ram, U., & Kumar, P. 2021).

Additionally, most prisons house under-trial inmates, who frequently spend years behind bars awaiting the outcome of their trials. This contributes to overcrowding and increases the likelihood of acquittal because of lack of evidence.

Regarding the creation of "open jails" or "open prisons," the Hon'ble Supreme Court observed that this concept deserves careful thought. Open prisons have two purposes: they not only remove criminals from society but also help people get back on their feet by providing them with organized therapy that addresses the root causes of their crimes. It has undoubtedly opened up a new perspective in the field of correctional treatment, offering an offender greater freedom, a more natural setting, and reduced stress, all of which contribute to the creation of an environment that is more conducive to self-reformation and the achievement of social, moral, and economic rehabilitation in society (Tiwari, S. (2021).

Open prisons can offer a workable way to solve this issue. Open prisons can lessen overcrowding in conventional prisons by enabling inmates to walk around freely and participate in constructive activities during the daytime. Better living conditions for inmates, particularly those waiting trial, may result from this, as it allows them to spend their time on worthwhile activities rather than lengthy and time-consuming legal proceedings.

#### **4. Indian Open Prison setup**

Open prisons, also known as semi-open or minimum-security prisons, have emerged as a potential solution to these persistent problems. By emphasizing trust, responsibility, and community engagement, open prisons seek to reform rather than merely punish offenders<sup>4</sup>

A "Prison" under section 3 is defined as an institution designed for confining prisoners. (Prisons Act, 1894). In the past, prisons were thought to be contained areas where criminals could contemplate their transgressions while being cut off from the conveniences and chances of society. However, society and governmental perspectives on prisoners' rights have changed

over time, acknowledging the significance of treating them with respect. Rajasthan Open Air Camp Rules, 1972 defines open prisons as "prisons without walls, bars, and locks." After leaving the prison, inmates are required to return before the second roll call (VP, D., 2021).

The concept of open prisons in India was first realized in 1949. The first open prison was opened in Lucknow. The primary objective of these facilities is to aid in the rehabilitation of inmates and their integration into society after their release.

In 1949, India witnessed its first open prison in Lucknow. The emergence of such facilities was aimed specifically to aid in the rehabilitation of inmates and their reintegration into society after release. Later in 1953, the open jail was established to build a dam over the Chandraprabha River close to Banaras. Following the completion of this dam, the inmates were moved to a neighboring location where a dam across the Karmnasa River would be built. In the decade of the 1950s, there were several open prison camps, notably the ones in Shahgarh, Chakiya, and Naugarh. Rajasthan opened its initial open prison in Sanganer in 1963. Remarkably, these camps were called the "Sampurnanand camps" since Sampurnanand, an esteemed reformist, who advocated for them in the 1950s. (Lokhande, D., 2020)

Open prisons provide opportunities for inmates to earn money through work programs that include agriculture, public utility construction, and other similar activities. Inmates' families frequently get these profits, which enables them to continue receiving financial support during their sentence. The States of Manipur, Uttar Pradesh, Mizoram, Tripura, Haryana, Arunachal Pradesh, Nagaland, Meghalaya, Goa, Chhattisgarh, and Sikkim do not operate any of India's ninety-one open jails, according to data from the National Crime Records Bureau for 2022. The success of Open-air camps in Rajasthan serves as a compelling example, and it is an important initiative to be implemented across all states with the active involvement of civil society. As part of a larger responsibility to uphold efficient jail administration and safeguard inmates' rights, the Supreme Court of India has been instrumental in advocating for open prisons. The Court concluded in **Charles Sobhraj v. Superintendent (1978)**, that imprisonment has both a punitive and a reformatory purpose, and that open prisons may encourage rehabilitation by enabling inmates to continue maintaining connections with their families and partake in constructive activities.

A growing number of people are realizing that imprisonment serves purposes other than

punishment considering this changing viewpoint. Rather, the emphasis is on helping criminals get back on their feet and reintegrate into society. With the goal of lowering recidivism, this change emphasizes the significance of giving convicts chances for education, skill development, and personal improvement.

Society recognizes the inherent dignity and capacity for redemption in every person, including those who have committed crimes, by adopting a reformatory approach to punishment. In addition to holding people accountable for their actions, this comprehensive approach to justice seeks to help them lead law-abiding lives on getting out from prison. Therefore, to achieve significant justice reform and create safer, more inclusive communities, open prison projects must be implemented and expanded.

### **5. Functioning and Features of Open Prisons in India**

- a) **Minimal Security and Trust-Based System:** Traditional high walls, wired fencing, and armed guards are not present in open prisons. To preserve security and order, they instead rely on the self-control, faith, and sense of civic duty of the prisoners.
- b) **Freedom of Movement and Employment:** During daylight hours, inmates have permission to leave the prison grounds in order to find work, work in agriculture, or take part in other productive activities. They must return to the prison campus by a designated time in the evening, typically for a roll call.<sup>3</sup>
- c) **Family Integration:** Many open prisons permit inmates to live with their families within the prison or allow regular family visits. Children of inmates may attend nearby schools, and the overall environment is designed to be more like a community than a conventional jail.
- d) **Productive Engagement:** Inmates work in various sectors such as agriculture, animal husbandry, factories, or local industries. They earn wages for their work, which they can use to support themselves and their families.
- e) **Self-Management and Inmate Participation:** Certain open prisons, such as those in Rajasthan, have a panchayat (council) system in which a chosen group of offenders assist in running day-to-day operations, encouraging inmate leadership and communication.
- f) **Low Operational Costs:** Open prisons are significantly less expensive to operate compared to conventional prisons due to reduced security needs and infrastructure



requirements.

Open prisons operate under the provisions of the Prisons Act, of 1894, and are subject to state-specific rules and regulations that govern the selection of inmates, operational protocols, and security measures.

## **6. Indian judiciary's positive approach about open jails:**

In the nineteenth century, the idea of open prisons was introduced in both the United States and the United Kingdom. Nonetheless, the open jail system of today was initially put in place in Europe throughout the 20th century, especially in Sweden and Norway. With the passage of the Prisons Act in 1969, which allowed for the construction of open prisons for the purpose of inmate rehabilitation, the idea of open prisons was first introduced in India. The Constitutional Court of India has taken the lead in interpreting and applying this law.

One of the earliest court recognitions of open jails in India was the **Sunil Batra v. Delhi Administration case (1978)**. The Supreme Court recognized the critical role that open prisons play in the rehabilitation of prisoners in this historic ruling.

The Supreme Court reiterated its position on the importance of open prisons in **Prem Shankar Shukla v. Delhi Administration (1984)**, concluding that the State must give prisoners suitable facilities that support their reformation and rehabilitation. The effectiveness of open prisons in lowering recidivism and promoting convicts' social reintegration was acknowledged by the Court.

Later on the Supreme Court ruled in **Dhapu Mandal v. State of West Bengal (1992)** that open prisons are a "privilege" granted to inmates who have behaved well rather than a type of "punishment." The Court also noted that rather than being a way to ease prison overcrowding in conventional facilities, open prisons ought to be a tool for inmate reformation and rehabilitation.

The Supreme Court has adopted a more liberal stance on open prisons in recent years. The Court acknowledged the necessity of extending the idea of open prisons to include women and young prisoners in the **Re-Inhuman Conditions in 1382 Prisons (Supreme Court of India, 2018)**. The Supreme Court of India instructed the government to create a policy in this area

after observing that open prisons shouldn't be exclusive to male inmates.

The Supreme Court's landmark ruling in **Sunil Gupta v. State of Madhya Pradesh (2019)** has significantly influenced India's legal environment with regard to the control and management of open prisons. The Supreme Court emphasized in this instance the necessity of open prisons in order to give inmates sufficient chances for reformation and rehabilitation. The Court ruled that open prisons should be viewed as an essential pillar of the entire criminal justice system rather than as a luxury afforded to a select few inmates.

The Supreme Court has acknowledged how open jails could mitigate the burden of conventional prison systems. The Court highlighted in **Rattan Singh v. State of Punjab (2019)** that open prisons are a good substitute for other types of confinement for specific inmate categories, such as those who are terminally sick or otherwise incapable. In **State of Punjab v. Jagmeet Singh (2020)**, the Court further supported this approach by holding that open prisons are an essential component of the criminal justice framework and need to be used to alleviate the issue of overcrowding in conventional jails.

## **7. Challenges and Contemporary Developments in Establishing Open Prisons in India:**

While opening open prisons in India holds promise for reducing jail overcrowding and encouraging rehabilitation, there are a number of important obstacles to overcome:

- a) **Strict and Conservative Eligibility Criteria:** Admission to open prisons is often restricted to nonviolent offenders with good behavior, excluding habitual offenders and under trial prisoners. These conservative criteria mean many who could benefit remain in closed prisons, limiting the impact of open prisons on overall decongestion and reform.
- b) **Lack of Uniformity and Outdated Laws:** Since prison administration is a state matter under the Constitution, there is a lack of consistency in the creation and operation of open prisons between states. Outdated laws and inconsistent regulations hinder the expansion and effective functioning of open prisons, with some states prioritizing them and others neglecting the model entirely.
- c) **Infrastructure and Resource Constraints:** The rapid rise in prison populations-over 50% in the last decade-has not been matched by corresponding increases in

infrastructure or human resources. The India Justice Report 2025 notes that average overcrowding in prisons is 131%, with some prisons housing four times their intended capacity (United Nations Office on Drugs and Crime, 2013). Inadequate financial allocations, lack of trained welfare officers, social workers, and psychologists further weaken the rehabilitative potential of open prisons.

- d) **Public Perception and Political Will:** There is no urgency or support for growing open prison systems since the public and legislators frequently believe that prisoners are irredeemable. Concerns about apparent leniency and doubts about the discipline and security of open prisons are prevalent.
- e) **Selection Process and Accountability:** Administrative panels that operate with restricted authority and minimal transparency often decide which inmate will be transferred to open prisons. The reliability and impartiality of the selection process get jeopardized by the likelihood of bias, arbitrariness, and the prospective abuse of discretion brought on by the absence of institutional accountability.
- f) **No Provision for Under trials:** Most open prisons do not admit under trial prisoners, even though under trials constitute a majority (77% as per NCRB 2021 data) of the prison population, further reducing the utility of open prisons in addressing overcrowding (Carroll, J. E., 2021).
- g) **Inequality Across States:** The number and quality of open prisons vary widely across states, with some states like Rajasthan having successful models, while others have negligible or no open prisons.

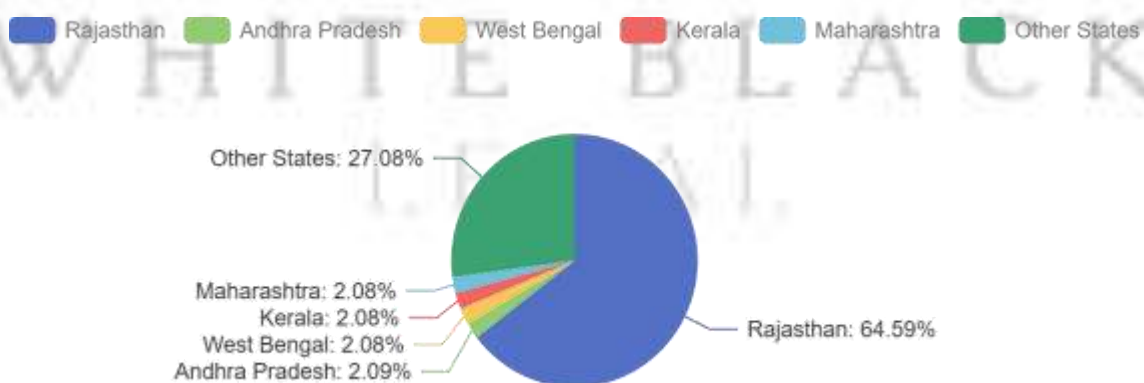


Figure 1: Distribution of Open Prisons in India by State



An examination of the National Crime Records Bureau, 2018 statistics and the Prison Statistics India Report, 2018 shows a troubling pattern in the consistent establishment of open correctional facilities in Indian states since independence. Even with the lofty goals set upon independence, there has not been any increase in the total number of open jails. Only 17 states and union territories had operationalized open prison facilities as of December 31, 2018. Notably, 31 of the 77 open jails in India were located in Rajasthan alone. Occupancy rates indicate disparities, while West Bengal reported the highest at 114.53% and Andhra Pradesh the lowest at 15.33%.

Kerala and Maharashtra are the only two states that have built space for female prisoners in open jails. Although Maharashtra has comparatively fewer operational open prisons, it possesses the highest inmate accommodation capacity within such institutions, reflecting a concentrated infrastructural investment in the open prison system. (Figure 1). Latest data of NCRB 2021, states that in 2021 there is a capacity of 6,213 prisoners which can be accommodated in open prison, but only 3,075 were housed there (Xolmatov, S. (2024).

## **8. Conclusion:**

A major shift from the previously retributive notion of imprisonment to a rehabilitative and reformatory orientation within the jail system can be observed by India's ongoing expansion of open prison facilities. In principle, open prisons are meant to give inmates a greater degree of autonomy, allowing them to maintain their ties to their families and communities while delivering possibilities for development and career training. The goal of this system is to help create an atmosphere that encourages criminals to change as well as makes it easier for them to reintegrate into society upon their release. Empirical evidence suggests that these rehabilitative environments can contribute to reduced recidivism rates and alleviate the persistent issue of prison overcrowding, which has long plagued the Indian penal system. Nevertheless, the implementation of open prisons is fraught with considerable challenges, including heightened security risks-as demonstrated by instances of escapes-disparities in the distribution and utilization of facilities across states, and the absence of a uniform legislative framework governing their operation. The underutilization of available capacity, as reflected in recent NCRB data, further underscores the need for standardized eligibility criteria and enhanced administrative awareness. Moreover, the provision of facilities for female inmates remains markedly inadequate, highlighting gender disparities within the system. Addressing these

multifaceted challenges necessitates the formulation of a comprehensive and inclusive national policy, underpinned by rigorous selection processes that incorporate psychological assessments and clearly defined operational guidelines. The invocation of constitutional provisions, particularly Article 253, could empower the central government to enact legislation that harmonizes the management of open prisons across states, despite the subject's placement on the State List. In conclusion, while the open prison model is not without its complexities, its potential to promote restorative justice, reduce systemic burdens, and uphold the dignity of incarcerated individuals renders it a promising and progressive alternative to conventional incarceration in India.

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