



BANKING AND FINANCE

Delhi High Court on Currency Accessibility: Relief for Visually Impaired Persons

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Introduction

Accessibility is a constitutional and statutory mandate, not an optional policy choice. The Rights of Persons with Disabilities Act, 2016 (RPwD Act) places an obligation on the State and its instrumentalities to ensure that persons with disabilities, including those with visual impairments, are able to access financial and civic infrastructure on an equal basis with others. In a significant judgment delivered on 24 September 2025, the Delhi High Court in *Rohit Dandriyal & Ors. v. Reserve Bank of India & Ors.* and connected matters dealt with petitions that sought to address the difficulties faced by visually impaired persons in identifying Indian currency notes, particularly the ₹50/- denomination introduced after demonetization. The Court examined the issue comprehensively, engaging with expert committee reports, responses of the Reserve Bank of India (RBI), and the broader constitutional framework. This case serves as an important precedent on how accessibility concerns must be integrated into policy-making, especially in areas as critical as financial inclusion.

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Background and Petitions

The controversy originated after demonetization in 2016, when the newly introduced Mahatma Gandhi (New) Series of currency notes reduced size variations between denominations. Visually impaired persons found it increasingly difficult to distinguish notes by touch, as earlier size-based identification became ineffective. Four sets of petitions were filed between 2017 and 2020 by individuals and organizations representing the visually impaired.

In W.P.(C) 9728/2017, Rohit Dandriyal and others sought directions for issuing ₹50/- notes with tactile identification features and for withdrawing inaccessible notes. In W.P.(C) 10727/2017, the All India Confederation of the Blind prayed for redesigning and replacing all inaccessible notes and coins. In W.P.(C) 64/2019, the Blind Graduates Forum of India sought the framing of standards under Section 40 of the RPwD Act for banknotes, coins, ATMs, banking apps, and portals, POS Devices, and for conducting periodic accessibility audits. In W.P.(C) 694/2020, George Abraham requested the appointment of a committee to recommend guidelines for accessible financial services. These petitions were consolidated as they raised substantially similar issues.

Formation of High-Powered Committee

Recognizing the systemic nature of the issue, the Court by order dated 29 July 2022 constituted a High-Powered Committee chaired by Prof. M. Balakrishnan of IIT Delhi. The committee included senior RBI officials, professors from IIT Delhi, representatives of the visually impaired, and an officer nominated by the Union of India. The Committee was tasked with studying the challenges and providing practical, technology-driven, and policy-oriented recommendations. The Court also observed that such proactive steps should ideally have been undertaken by policy-makers themselves, but judicial intervention became necessary to ensure compliance with the law.

Recommendations of the Committee (07 July 2023)

The Committee's report highlighted serious concerns. It noted that reduced size differences between denominations had made the new notes nearly indistinguishable by touch, thereby hampering independent transactions by visually impaired persons. It recommended increasing size variations, improving color contrasts, and exploring durable materials such as polymer notes. It found that tactile marks, embossing, and bleed lines were inadequate, as they wear out quickly once the notes circulate widely. The Committee urged that inaccessible notes be withdrawn in a phased manner.

The Committee also examined the MANI App, RBI's Mobile Aided Note Identifier. While it recognized its utility, the Committee noted its limitations, especially in outdoor or noisy environments. Improvements were recommended to ensure effective use. Finally, the Committee stressed that the proposed Digital Rupee (CBDC), which was in the pilot stage, must be designed to be accessible for persons with disabilities before its final launch.

RBI's Stand and Reports (2023–2025)

The RBI filed detailed responses and action taken reports in 2023, 2024, and 2025. It submitted that the current confusion in identifying notes was largely due to both the old and new series of notes circulating simultaneously. According to the RBI, once the old notes are phased out under its "clean note policy," identification will become easier. It argued that redesigning notes is a highly complex process, taking seven to ten years, involving consultation with stakeholders, changes in printing processes, recalibration of ATMs, and expenditure running into thousands of crores. Immediate redesign, the RBI maintained, would cause disruption to the economy and create confusion.

RBI emphasized that the Mahatma Gandhi (New) Series already incorporates accessibility features such as intaglio printing, tactile marks, bleed lines, and variable colors. It also confirmed that feedback from national associations of the blind is being considered for the next series of banknotes. Regarding the MANI App, RBI defended its utility by highlighting that it functions across multiple languages, under varied light conditions, and even with folded notes, though it admitted that improvements may still be needed. On the Digital Rupee, it clarified that the pilot is ongoing and accessibility will be ensured before nationwide launch. Additionally, in 2024, RBI issued circulars requiring banks and payment system providers to ensure accessibility in devices, cards, and POS machines.

Court's Analysis

The Delhi High Court carefully weighed the petitioners' demands against the RBI's policy considerations. On the issue of digital accessibility, the Court found that significant steps had been taken by RBI and directed that all banks must submit six-monthly progress reports until full compliance with accessibility standards is achieved. On the issue of currency notes, the Court recognized the genuine hardships faced by visually impaired persons but acknowledged RBI's concerns about the costs, disruptions, and feasibility of immediate redesign. The Court observed that the appropriate course of action would be to ensure that the next series of banknotes incorporates the recommendations of the High-Powered Committee.

The Court was also mindful of the limits of judicial power in matters of policy-making. It held that the introduction of new notes or digital currency falls squarely within the policy domain of the RBI and the Government of India. Consequently, no writ of mandamus could be issued compelling an immediate redesign of notes. However, the Court emphasized that while policy-makers retain discretion, they must remain bound by the constitutional obligation of accessibility. In doing so, the Court also referred to the precedent set in *Pragya Prasun v. Union of India* (2025) 7 SCC 191, where the Supreme Court directed that digital KYC processes be made accessible for persons with disabilities. The reliance on this precedent reinforced the idea that accessibility is not charity but a constitutional entitlement under Articles 14 and 21.

Conclusion and Author's Opinion

The Delhi High Court's judgment took a strained approach, striking a balance between economic feasibility and constitutional rights. It avoided issuing disruptive directions that could destabilize the financial system, but at the same time it ensured that accessibility for visually impaired persons remains a binding responsibility of the RBI and the Government of India. The insistence on bi-annual reporting ensures that accessibility becomes a monitored and measurable obligation rather than an aspirational promise.

In the author's opinion, this judgment represents judicial pragmatism that still advances constitutional morality. The Court respected the boundaries of policy-making while ensuring that the concerns of the visually impaired were not dismissed as impractical. The direction to integrate accessibility in the next series of banknotes, coupled with improvements in digital financial services, lays the groundwork for a more inclusive future. Accessibility must be recognized as a right flowing from equality and dignity, not as a concession. This case should serve as a guiding light for both policymakers and regulators that inclusivity must be built into the very design of public systems.

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