



CONSTITUTIONAL LAW

Supreme Court's Landmark Mental Health Guidelines: Turning a Tragedy into Educational Reform

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Introduction

There is a broad underlying generational issue, namely, the growing crisis of student suicides in the context of contemporary education. As articulated by philosophers such as Jean-Jacques Rousseau and Jiddu Krishnamurti, education was never meant to be confined to academic success or professional advancement. It was envisioned as a means of holistic development intellectual, emotional, ethical, and spiritual. Rousseau, in *Émile*, emphasized that education must adapt to a child's needs and individuality, while Krishnamurti warned against conditioning young minds through fear and competition. These ideals resonate with the constitutional understanding of the right to life under Article 21, which now encompasses mental well-being as part of holistic development.

Contrary to these ideals, the contemporary academic framework, particularly in the context of competitive examination systems, often subjects students to relentless psychological pressure. The foundational purpose of education appears to have been compromised.

In the recent past, there have been multiple reports of student suicides in premier educational institutions, more particularly, coaching centers. The gravity of this crisis cannot be overstated, and any incident involving the death of a student under such circumstances warrants utmost seriousness.

Statistical Data

The statistics published by the National Crime Records Bureau in its 2022 report recorded 1,70,924 suicide cases, out of which 7.6%, approximately 13,044 were student suicides. Notably, 2248 of these deaths were attributed directly to failure in examinations. As per the NCRB data, in the last two decades, the number of suicides among students has increased from 5,425 in 2001 to 13,044 in 2022. The Law Commission of India, in its 210th Report (2008), has recognized suicide as one of the most tragic and preventable forms of death in our society, also recommending decriminalization of attempt to suicide under Section 309 IPC — a change later reflected in the Mental Healthcare Act, 2017

Factual Background

The case arose from the Andhra Pradesh High Court's order in W.P. No. 25381 of 2023, rejecting a plea to transfer the investigation of FIR No. 148 of 2023 to the CBI. The FIR was filed after the unnatural death of the appellant's 17-year-old daughter, Ms. X, a NEET aspirant enrolled at Aakash BYJU's Institute in Visakhapatnam and residing at Sadhana Ladies Hostel.

On July 14, 2023, Ms. X allegedly fell from her hostel's third floor under suspicious circumstances. Initially conscious, she was taken to Venkataramana Hospital but later deteriorated, and despite transfer to Care Hospital, she died on July 16, 2023.

Her father alleged grave lapses: contradictory CCTV footage, failure to record her statement despite consciousness (AIIMS later confirmed a Glasgow Coma Score of 10/15 at admission), premature destruction of viscera, non-preservation of forensic evidence, and a conflicted autopsy doctor serving multiple roles like post-mortem, chemical analysis, and inquiry committee.

The Andhra Pradesh High Court had earlier directed DNA testing at AIIMS but declined the CBI transfer citing jurisdictional limits over FIRs filed in two states. The Supreme Court quashed this order, citing systemic investigational failures, and transferred the probe to the CBI with a four-month deadline.

Key Guidelines Issued

Invoking its powers under **Articles 32 and 141**, the Court laid down binding mental health and suicide prevention guidelines to be followed by all educational institutions (schools, colleges, universities, hostels, and coaching centres) until formal legislation is enacted:

- Uniform Mental Health Policy:** Every educational institution must adopt a formal mental health policy aligned with the UMMEED Draft Guidelines (NCERT), MANODARPAN initiative (Ministry of Education), and the National Suicide Prevention Strategy (Ministry of Health and Family Welfare) Taken together, these represent a layered approach:
 - UMMEED helps schools build internal systems for early warning and support.
 - MANODARPAN offers students, educators, and families a national backup of resources, counselling, and outreach.

- The National Strategy provides legal, structural, and policy support—binding cross-institution coordination and public health mobilization to reduce suicides overall.
 - Each plays a distinct yet coordinated role in transforming India’s educational, institutional, and mental health landscape.
 - This policy must be updated annually and made accessible on institutional websites and notice boards.
2. **Appointment of Counsellors and Mental Health Professionals:** Institutions with **100+ students** must employ at least **one qualified counsellor, psychologist, or social worker** trained in child and adolescent mental health. Smaller institutions must establish formal referral linkages with certified external professionals.
 3. **Student-to-Counsellor Ratio and Mentorship:** Institutions must maintain **optimal student-to-counsellor ratios** and assign dedicated mentors for smaller student groups, particularly during exam seasons or academic transitions.
 4. **Ban on Harmful Academic Practices:** Prohibit **batch segregation based on performance**, public shaming, or imposing unrealistic academic targets, especially in coaching institutes.
 5. **Suicide Prevention and Emergency Protocols:** Institutions must display **suicide prevention helplines** (e.g., Tele-MANAS) prominently in classrooms, hostels, and online platforms. Written protocols for **referral to mental health services and emergency medical care** are mandatory. Restrict access to **high-risk areas** like rooftops in hostels and coaching centres.
 6. **Mandatory Training for Staff:** All teaching and non-teaching staff must undergo **bi-annual training** on mental health, psychological first-aid, recognising warning signs, and referral mechanisms. Training must include **sensitivity towards vulnerable groups**, including LGBTQ+ students, those from marginalised backgrounds, students with disabilities, or those with prior trauma.
 7. **Anti-Harassment and Bullying Measures:** Institutions must establish **confidential, robust mechanisms** to address sexual harassment, ragging, bullying, and caste/gender-based discrimination. Internal committees must provide **immediate psycho-social support to victims** and enforce zero tolerance for retaliation.
 8. **District-Level Monitoring Committees:** Each district will form a **Monitoring Committee chaired by the District Magistrate** to ensure compliance and conduct periodic audits of mental health measures in institutions.
 9. **Institutional Accountability:** Negligence in implementing these safeguards, especially where lapses lead to self-harm or suicide, will amount to **institutional culpability**. Non-compliance could also expose institutions to writ petitions, tort liability, and potential criminal negligence proceedings.

Significance of the Judgment

This ruling mirrors the Vishaka Guidelines model, laying down interim safeguards pending formal legislation. It explicitly recognises mental health as integral to Article 21’s right to life and imposes accountability on schools, colleges, hostels, and coaching centres. By linking institutional lapses in Ms. X’s case with systemic failures, the judgment transforms a single tragedy into a catalyst for reform. It mandates an overhaul of student welfare mechanisms and mental health safeguards across India.

Next Steps

The Supreme Court has directed the Union Government to file a compliance affidavit within 90 days, detailing implementation steps, regulatory rules for coaching centres, and monitoring frameworks. The directions will require coordinated action by State Governments, affiliating boards such as CBSE, and higher education regulators such as UGC and AICTE to ensure uniform enforcement.

This judgment is both a demand for justice in Ms. X’s case and a blueprint for preventing further student suicides by reshaping India’s educational environment to prioritise well-being alongside academic achievement.

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