

Grassroots Legal Aid in India: Challenges and Lessons

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PART-I INTRODUCTION

India's socio-economic diversity necessitates a model of legal aid that goes beyond courtroom representation and penetrates the daily realities of the underserved. With a population exceeding 1.4 billion spread across over 600,000 villages, 28 states, and 8 Union Territories, India presents immense geographic, linguistic, and cultural heterogeneity. Approximately 65% of the population resides in rural areas², where access to legal or formal justice delivery institutions remains severely constrained—not only due to distance, illiteracy, and poverty, but also because of the concentration of such institutions in cities and towns. This need is further accentuated by the burden on the formal justice system itself: as on 11th June 2025, more than 46 million cases were pending before the district judiciary, including approximately 11 million civil cases and 35 million criminal cases, according to the National Judicial Data Grid (NJDG)³. In this context, community-based legal support systems play a vital role—not only in easing the caseload of formal courts, but also in providing legal assistance and advice that facilitates the swift and cost-effective resolution of disputes at the pre-litigation stage.

This need for grassroots legal aid is further accentuated by the shortage of judicial personnel and infrastructure in India. As of 2023, in the district judiciary alone, which serves as the primary interface for litigants at the grassroots, there are 5,300 vacancies against a sanctioned strength of 25,081 judges—comprising a 21% shortfall in both the District Judge and Civil Judge cadres⁴.

¹ Judge, District Judiciary, Haryana (India)

² Census of India, 2011; Ministry of Rural Development, Government of India

³ National Judicial Data Grid, *District and Taluka Court Statistics*, accessed on 11 June 2025, <https://njdg.ecourts.gov.in>

⁴ *State of the Judiciary: A Report on Infrastructure, Budgeting, Human Resources and ICT*, Centre for Research and Planning, Supreme Court of India, 2023, Executive Summary, p. ix

The idea of grassroots legal aid in India is not a recent innovation but finds its conceptual roots in the country's earliest efforts to democratize access to justice. A foundational articulation of this vision was provided in the 1973 Report of the Expert Committee on Legal Aid—chaired by Justice V.R. Krishna Iyer—which categorically rejected the narrow notion of legal aid as mere courtroom representation for indigent litigants. The Committee emphasized that legal aid must function as a means of social justice and must be “woven into the fabric of every community,” with outreach tailored to the living conditions and vulnerabilities of the poor⁵. It advocated a functional and decentralized approach, urging that legal aid mechanisms include legal literacy, pre-litigation counselling, simplified procedures, and the involvement of trained volunteers at the grassroots⁶. The report also proposed the establishment of neighbourhood-level legal aid centers staffed by social workers, teachers, and law students to act as justice intermediaries⁷. This community-oriented philosophy marked a crucial departure from litigation-driven aid and laid the groundwork for a broader, preventive, and participatory model.

The Committee on National Juridicare, chaired by Justice P.N. Bhagwati, advanced the vision of inclusive legal aid in its 1977 report *Equal Justice – Social Justice*. It proposed the National Legal Services Bill, introduced class action and public interest litigation as tools for collective redress, and recommended a multi-tier legal aid system with broad institutional representation. The report also advocated for rural outreach. A notable recommendation was the creation of the Committee at a National Level to pursue a two-pronged strategy comprising both litigative legal aid and preventive or strategic legal aid, thereby broadening and institutionalizing access to justice for the poor⁸.

⁵ *Report of the Expert Committee on Legal Aid – Processes and Procedures* (1973), Ministry of Law and Justice, Government of India, p. 15: “Legal aid must not be an appendage to the existing legal system; it must be woven into the fabric of every community and reach the common man where he lives and struggles.

⁶ *Ibid.*, p. 18: “The Committee recommends that legal aid should include legal education, counselling, simplified procedures, and assistance in filling forms, particularly for weaker sections.”

⁷ *Ibid.*, pp. 23–24: “Legal aid posts in villages and slums should be run by trained social workers, teachers, and para-legal personnel with links to law colleges and bar associations.”

⁸ Committee on National Juridicare: *Equal Justice–Social Justice*, Report submitted to the Government of India by Justice P.N. Bhagwati, August 31, 1977, Government of India, Ministry of Law, Justice and Company Affairs.

These foundational principles would later inform the Legal Services Authorities Act, 1987, which institutionalized a multi-tiered legal services framework designed not only to provide legal representation but also to promote legal awareness and assist in the actual realization of legal rights at the community level. Through its structural emphasis on decentralization, outreach, and inclusion, the Act translated the social justice vision of earlier committees into a functioning legal framework that touches the grassroots of Indian society⁹.

The architecture of India's legal aid system is explicitly designed to extend justice to the grassroots. Through decentralized authorities, community outreach, and statutory mechanisms like Lok Adalats and legal literacy initiatives, the framework aims to bridge the justice gap for rural and marginalized populations. While the broader architecture of grassroots legal aid includes legal aid camps, school-based legal literacy programs, and village-level awareness drives, this paper confines its analysis to two key institutional mechanisms: Legal Aid Clinics and the Para Legal Volunteer (PLV) Scheme. Legal Aid Clinics were formally institutionalised under the NALSA (Legal Services Clinics) Regulations, 2011, to provide free legal advice, drafting support, and pre-litigation services at the community level. Complementing them is the PLV Scheme, introduced in 2009, which empowers trained local volunteers to act as justice intermediaries within their communities.

This paper draws upon three primary sources of data. First, it utilizes quantitative records published by the National Legal Services Authority (NALSA) between 2020 and March 2025, covering statistical trends related to Legal Aid Clinics and the Para-Legal Volunteer (PLV) Scheme. Second, it incorporates findings from an online survey conducted by the author in 2020, which received responses from District Legal Services Authority (DLSA) Secretaries. Third, the paper is informed by qualitative field observations gathered during visits to several states, including Haryana, Delhi, Himachal Pradesh, Punjab, Jharkhand, Madhya Pradesh, Assam, Karnataka, Kerala, Tamil Nadu, Andhra Pradesh, and West Bengal (Kolkata). These visits involved informal interactions with PLVs, jail authorities, DLSA officers, and

⁹ *Legal Services Authorities Act 1987*, Act No. 39 of 1987, s. 1(3) (came into force on 9 November 1995).

legal aid beneficiaries. While no formal research methodology was adopted, additional insights were drawn from discussions held during meetings of District Legal Services Authorities from 2018 to 2021, which provided further institutional perspectives on the functioning and limitations of grassroots legal aid mechanisms.

This paper examines the structural and operational dynamics of two grassroots legal aid models, draws key lessons from their implementation, and proposes targeted reforms to improve their effectiveness, institutional resilience, and community reach.

PART- II

Legal Aid Clinics: Framework and Functioning

Legal Aid Clinics (LACs) represent a core component of India's strategy to deliver justice at the grassroots. Envisioned as decentralised units to provide basic legal services at the community level, their statutory foundation lies in Section 4 of the Legal Services Authorities Act, 1987, which empowers the National Legal Services Authority (NALSA) to formulate schemes and regulations for legal aid delivery¹⁰. This mandate culminated in the adoption of the *NALSA (Legal Services Clinics) Regulations, 2011*, which institutionalised the framework and operational design of Legal Aid Clinics across India¹¹.

As per Regulation 3 of the *NALSA (Legal Services Clinics) Regulations, 2011*, District Legal Services Authorities (DLSAs) are mandated—subject to the availability of financial resources—to establish Legal Services Clinics across a broad range of locations. This includes not only villages or clusters of villages, but also jails, educational institutions, community centres, protection homes, juvenile justice boards, and other strategically identified spaces where access to legal services is hindered by geographic, social, or systemic barriers.¹² The aim is to ensure that people living in remote or socially disadvantaged areas can obtain legal help without having to travel to distant courts or legal services offices. Local bodies such as panchayats are

¹⁰ Section 4(b), Legal Services Authorities Act, 1987.

¹¹ NALSA (Legal Services Clinics) Regulations, 2011, Preamble and Regulation

¹² Ibid., Regulation 3.

encouraged to provide infrastructure support, including physical space for such clinics¹³.

Regulations 5 and 6 of the NALSA (Legal Services Clinics) Regulations, 2011 prescribe the minimum human resource deployment necessary for the functioning of Legal Services Clinics. Regulation 5 mandates that each clinic must be staffed by at least two trained Para-Legal Volunteers (PLVs) during working hours. These PLVs are expected to assist deputed lawyers in drafting legal documents and provide first-level support to clients. Additionally, the regulation encourages PLVs to pursue formal legal education to enhance their long-term capacity. Regulation 6 deals with the deputation of lawyers to these clinics. It authorizes the nearest legal services institution to depute panel or retainer lawyers to a clinic. Where cases require sustained engagement, the same lawyer may be retained for continuity. Together, these provisions emphasize the need for consistent human presence and qualified personnel in ensuring that legal aid clinics serve as effective community legal interfaces rather than symbolic establishments.

Crucially, Legal Aid Clinics are not confined to litigation-related support. Regulation 9 explicitly lists non-litigation services including assistance in applying for welfare benefits under schemes like MGNREGA, accessing pensions, securing ration cards, or resolving disputes with local authorities¹⁴. The clinics thus function as single-window legal facilitation centers aimed at improving access to entitlements and enhancing the interface between citizens and the State.

An important innovation under the 2011 Regulations is the integration of law schools and universities into this framework. Regulation 24 provides for the establishment of Legal Aid Clinics in law colleges as part of clinical legal education, encouraging student volunteers to participate in community engagement, village adoption programmes, and awareness campaigns¹⁵. These student-run clinics, under

¹³ Ibid., Regulation 11(2).

¹⁴ Ibid., Regulation 9.

¹⁵ Ibid., Regulation 24.

faculty supervision, bridge the gap between academic instruction and grassroots service.

Legal Services Clinics (LSCs) have been established in a range of institutional and community settings to enhance access to legal aid. These include villages, jails, juvenile justice institutions, and other designated locations. The objective is to facilitate decentralized delivery of legal services, particularly in areas where formal legal infrastructure may be limited or difficult to access. Village-based clinics are intended to serve rural populations by providing basic legal assistance and awareness, while jail-based clinics aim to support undertrial and convicted prisoners by offering legal assistance and advice within the correctional system. The varied placement of clinics reflects an effort to address different access needs across demographic and institutional contexts.

A comparative assessment of state-wise data on Legal Services Clinics (LSCs) for the year 2024–25 highlights pronounced disparities in their population coverage across India¹⁶. Uttar Pradesh emerges as the most critically underserved, with only 90 clinics catering to a population exceeding 241 million, amounting to an overwhelming ratio of nearly 2.7 million individuals per clinic. Similarly, Maharashtra, with 493 Legal Services Clinics for an estimated population of 125 million, has a per-clinic population coverage of approximately 253,553 individuals. Chhattisgarh, with 129 clinics serving around 32 million people, reflects a comparable shortfall, with each clinic catering to roughly 248,062 individuals. In contrast, states like Jharkhand, Himachal Pradesh, and Karnataka demonstrate relatively better performance, with per-clinic population coverage ranging from approximately 28,000 to 55,000. These figures underscore the structural imbalance and point to the urgent need for state-specific planning to align legal aid infrastructure with demographic realities.

From 2020–21 to 2024–25, Legal Services Clinics (LSCs) in India significantly increased their service reach, as evidenced by a nearly fourfold rise in visitors, from 553,904 to 2,068,304, according to data from the National Legal Services

¹⁶ National Legal Services Authority (NALSA), Statistical Information on Legal Services Clinics, 2020–21 to 2024–25, available at <https://nalsa.gov.in/en/lac/statistics> (last accessed June 10, 2025)

Authority. Despite a decline in the number of clinics from 13,526 to 11,946, the absolute number of individuals receiving legal assistance grew from 452,863 to 1,341,986, reflecting an almost threefold increase. However, the proportion of visitors provided assistance decreased from 81.76% to 64.89%, suggesting a trade-off between scale and service rate. This growth in visitor numbers and assistance, coupled with a higher capacity per clinic (from 33.48 to 112.34 individuals assisted per clinic), highlights a substantial improvement in the accessibility and operational efficiency of LSCs.

Jail Legal Aid Clinics play a crucial role in providing legal assistance to inmates across India. These clinics, operational in various jails, ensure access to justice for undertrials, convicts, and other detainees who may lack the resources or knowledge to navigate the legal system. From April 2020 to March 2025, the number of Jail Legal Aid Clinics has shown significant engagement, with data indicating a consistent presence of over 1,000 clinics nationwide. For instance, in 2023-24, 1,215 clinics facilitated legal assistance to 324,867 individuals out of 456,798 visitors, while in 2024-25, 1,156 clinics assisted 419,517 out of 594,580 visitors.

Between 2021–22 and 2024–25, the number of operational Legal Services Clinics declined by about 8%, from 12,976 to 11,946. Law college-based clinics saw a steeper reduction of roughly 22%, dropping from 1,014 to 788.

The performance of State Legal Services Authorities (SLSAs) varies significantly across India. In 2024–25, Jharkhand led with 240,564 people assisted through 1,429 clinics, followed by Delhi (160,081 assisted) and West Bengal (150,421 assisted), both maintaining strong performance over recent years. In contrast, Union Territories like Andaman & Nicobar Islands, Lakshadweep, and Dadra & Nagar Haveli reported no activity for five consecutive years.

A comparative review of LSCs in Arunachal Pradesh, Assam, Manipur, Meghalaya, and Mizoram from 2021–22 to 2024–25 shows varied trends. Arunachal Pradesh expanded clinics (35 to 53) and significantly increased visitors (2,327 to 7,558) and assistance (2,134 to 6,831). Assam saw a notable drop in clinics (369 to 283) and

declines in visitors (42,607 to 40,642) and assistance (37,273 to 30,631). Manipur had a slight clinic reduction (60 to 59) and decreases in visitors (20,613 to 15,886) and assistance (15,434 to 13,606). Meghalaya maintained stable clinics (107 to 108) with modest visitor growth (355 to 1,315) and assistance (133 to 792), but volumes remain low. Mizoram saw a sharp clinic reduction (47 to 14) and declines in visitors (3,224 to 1,411) and assistance (2,473 to 1,334). Overall, the region experienced a net decrease in clinics and outreach, with only Arunachal Pradesh and Meghalaya showing growth, suggesting challenges like geographic remoteness.

A category-wise review of Legal Services Clinics shows distinct trends. Village-level clinics decreased from 6,119 in 2020–21 to 4,668 in 2024–25, yet the number of persons assisted increased from 187,374 to 314,632. Jharkhand (88,363 assisted), West Bengal (51,482 assisted), and Himachal Pradesh (36,825 assisted) had the highest number of persons assisted in village clinics in 2024–25. Jail clinics grew significantly, with persons assisted rising from 143,037 in 2020–21 to 419,517 in 2024–25, a 193% increase. Law college clinics declined in both number (1,093 in 2022–23 to 788 in 2024–25) and persons assisted (37,351 in 2022–23 to 24,986 in 2024–25). The "Others" category assisted 248,870 persons in 2024–25, but its lack of specific classification limits evaluation.

In 2020, a survey¹⁷ was conducted to assess the operational challenges facing Legal Aid Clinics (LACs) in India, specifically targeting Secretaries of District Legal Services Authorities (DLSAs) posted across the country. The findings revealed significant structural and operational deficiencies in both Legal Aid Clinics (LACs) and Community Legal Aid Centres (CLACs).

When asked whether CLACs could be better managed by law colleges, only 47% of the 183 respondents agreed, while 53% either disagreed or expressed uncertainty—indicating divided opinion about the model's effectiveness.³ Many

¹⁷ *Legal Aid System: An Assessment* (Author's Survey, 2020) (unpublished survey data on file with the author) [hereinafter *Legal Aid System Survey*]. The 2020 survey, conducted via Google Forms in 2020, comprised 22 questions on legal aid system. It was shared with DLSAs through SLSAs, with two follow-up reminders. A total of 187 responses (although DLSAs are 703) were received, though response counts varied slightly by question (180–187), and respondents were DLSA Secretaries. While offering valuable institutional insights, the survey's modest response rate and potential self-selection bias may affect representativeness.

Secretaries attributed these shortcomings to limited institutional support, lack of monitoring, and weak integration with the broader legal aid framework¹⁸. A significant number reported persistent infrastructural inadequacies, including lack of office space, computer systems, and internet connectivity¹⁹. Moreover, 59% of respondents supported the creation of a permanent cadre of Para-Legal Volunteers (PLVs), highlighting concerns about the irregular availability and insufficient training of PLVs and panel lawyers²⁰. Weak coordination between DLSAs, courts, and administrative stakeholders was also identified as a key barrier to effective service delivery²¹. To address these systemic issues, several Secretaries proposed appointing full-time or contractual legal aid lawyers in court-linked clinics, advocating for salary-based accountability mechanisms²². Collectively, the survey insights suggest that LACs often remain under-resourced and insufficiently institutionalized, limiting their potential as effective instruments of access to justice.

Although the NALSA (Legal Services Clinics) Regulations, 2011 envisage Legal Services Clinics (LSCs) as decentralized and accessible entry points to justice—especially for underserved populations—field-level observations and interactions conducted between 2018 and 2021 with functionaries of various State Legal Services Authorities reveal several persistent operational deficiencies. Regulation 11 requires that LSCs be established at locations “where the people of the locality can have easy access.” However, in practice, several clinics were found located in panchayat offices or government buildings that remained closed on weekends, which are often the only days when rural and daily-wage workers can seek assistance. While Regulation 13 requires the display of signage in English and the local language indicating the clinic’s name, working hours, and open days, such signage was frequently absent, diminishing public awareness and visibility.

¹⁸ Id. (Open-ended responses citing limited institutional support and lack of monitoring)

¹⁹ Id. (Repeated references to infrastructural deficits such as lack of space, IT equipment, and connectivity).

²⁰ Id. (“Do you think that Para Legal Volunteers should be a permanent cadre?” – 59% Yes; 183 responses).

²¹ Id. (Responses highlighting lack of coordination between DLSAs, courts, and stakeholders)

²² Id. (Multiple Secretaries suggested salaried or contractual appointments for court-linked legal aid lawyers).

Further, Regulations 9 and 10 emphasize that LSCs are to provide not only legal advice but also help with accessing welfare entitlements—such as preparing applications under MGNREGS, obtaining identity cards, or facilitating communication with public authorities. However, in many clinics, para-legal volunteers (PLVs), though proficient in drafting applications and forms, lacked training and support to meaningfully connect beneficiaries with welfare schemes. This often resulted in a paper-focused delivery model that fell short of the broader socio-legal facilitation envisioned in the regulations.

Field observations suggest that many Legal Services Clinics (LSCs) continue to operate under significant resource constraints. Clinics frequently lack essential digital infrastructure such as telephones, scanners, or internet access, which severely hampers the timely transmission of applications and follow-ups with District Legal Services Authorities (DLSAs) or front offices. While some successful integration models exist—for example, a Jharkhand-based clinic at Ranchi jointly functioning with a welfare facilitation centre—these are isolated exceptions rather than the norm.

Regulations 20 and 26 underscore the importance of maintaining proper records and conducting periodic reviews. Yet, data from the field suggests that manual registers, when maintained at all, are often incomplete or inconsistent. Clinics function in administrative silos, with no technological linkage to DLSAs for real-time supervision or data management. In the absence of a digitised monitoring mechanism, these clinics remain disconnected from systemic oversight. Furthermore, although Regulation 17 provides for honorarium payments to PLVs and lawyers, the remuneration is often delayed or inconsistently disbursed, causing demotivation and irregular attendance.

The cessation of national-level recognition and incentives—previously given by NALSA at National Level to high-performing State Legal Services and PLVs—has further eroded enthusiasm and institutional commitment. Unless legal aid clinics are re-integrated into the justice delivery ecosystem through technological upgrades, capacity-building, and recognition frameworks, they risk being symbolic outposts rather than transformative access points.

In contrast to the operational inconsistencies prevalent in village-based Legal Aid Clinics, the Legal Aid Clinics functioning within prisons have shown relatively higher levels of structure, supervision, and effectiveness. Field observations and interactions with stakeholders particularly between 2018 and 2021, corroborated by data from the *NALSA Prison Legal Aid Clinics Report (2024)*, indicate that jail-based clinics are more consistently functional, maintain proper documentation, and channel inmate applications to the District Legal Services Authorities (DLSAs) in an organised manner. Several systemic features explain this relative success. Secretaries of DLSAs typically visit district jails at least once a week, and in many districts, two to three times a fortnight. These visits serve dual purposes: they facilitate direct engagement with inmates to identify those requiring legal aid and ensure compliance with record-keeping and procedural standards within the jail clinics. In addition, the Chairman of the DLSA (usually the District and Sessions Judge) also undertakes monthly inspections, promoting institutional accountability.

Crucially, NALSA's issuance of instructions for prison legal aid clinics and structured formats for real-time data collection and reporting have played a transformative role. These insights point to an important inference: that legal aid delivery improves markedly where there is institutional proximity, structured monitoring, and standardised protocols. The performance of jail legal aid clinics offers a viable model that could be adapted and replicated in non-custodial grassroots settings—provided that similar oversight mechanisms and technological integration are put in place.

PART- III

The Para-Legal Volunteer Scheme: Framework and Functioning

The Para-Legal Volunteer (PLV) Scheme, introduced by the National Legal Services Authority (NALSA) in 2009 and later revised, aims to enhance access to justice through community-based intermediaries. The revised scheme provides a comprehensive framework for selecting, training, deploying, and supervising PLVs, who bridge the gap between underserved populations and Legal Services Institutions.

PLVs are drawn from diverse groups, including women, teachers, retired government servants, students, NGO members, and marginalized communities like SC/ST, ensuring social representation and local engagement. Their roles extend beyond legal literacy to facilitating welfare scheme access, pre-litigation dispute resolution, legal aid applications, and connecting communities with District Legal Services Authorities (DLSAs). The scheme mandates structured training, including orientation, induction, advanced, and refresher courses, managed by DLSAs under State Legal Services Authorities (SLSAs). PLVs receive an honorarium of at least Rs. 500²³ per day for specific tasks, with rates set by SLSAs, and reasonable expenses are reimbursed.

As per the estimated population of India in 2025, approximately 1.45 billion, the total number of Para-Legal Volunteers (PLVs) deployed as of March 2025 stands at 18,633. This translates to one PLV for every 77,811 persons, highlighting a significant shortfall in the grassroots legal outreach infrastructure. In populous states such as Uttar Pradesh (232.8 million), Bihar (121.3 million), and Maharashtra (131.0 million), the ratios are even more stark: Uttar Pradesh has 1 PLV per 934,940 persons, Bihar 1 per 79,075, and Maharashtra 1 per 143,640. Even if Uttar Pradesh were to deploy 2,000 PLVs, the ratio would remain at 1 PLV per 116,400 individuals, underscoring the persistent inadequacy. This vast population-to-PLV disparity severely limits the capacity of PLVs to deliver timely and effective legal assistance, undermining the preventive and awareness objectives outlined in the 2009 PLV Scheme. The scheme envisions PLVs as community-based facilitators capable of preempting legal issues and promoting early access to justice, yet the current scale of deployment remains insufficient to meet these ambitions, particularly in states with large populations and complex socio-legal challenges.

²³ See National Legal Services Authority, Para-Legal Volunteer Scheme . The honorarium for Para-Legal Volunteers was initially fixed at ₹250 per day, which was later enhanced to ₹500 per day.

Across the five-year period from 2020–21 to 2024–25, the total number of trained Para-Legal Volunteers (PLVs) consistently exceeded the number of deployed PLVs, indicating a persistent bottleneck in absorption and utilisation. For instance, in 2022–23, while 56,842 PLVs were trained, only 13,845 were deployed, meaning approximately 75.6% of trained volunteers were not utilised. This significant gap suggests systemic issues in integration, placement, or administrative follow-through. The training of PLVs requires substantial time, resources, and coordination with local legal services institutions. However, if trained volunteers are not formally assigned duties, their potential contribution to grassroots legal aid is lost, weakening the cost-benefit justification of training programs. While the number of deployed PLVs has shown an upward trend, rising from 13,153 in 2020–21 to 18,633 in 2024–25 (a 41.7% increase), the number of trained PLVs has generally declined, from 60,024 in 2020–21 to 50,478 in 2024–25. This contrast highlights the need for improved strategies to align training efforts with effective deployment to maximise the impact of PLVs in delivering legal aid.

The Para-Legal Volunteers (PLV) Scheme suffers from a persistent gap between training and field deployment, with 2024–25 data highlighting significant state-level disparities. Himachal Pradesh trained 5,786 PLVs but deployed only 226 (3.9%), and Uttar Pradesh trained 2,795 but deployed just 249 (8.9%), reflecting severe underutilisation. Jharkhand, with 4,512 trained and 2,208 deployed (48.9%), fares better but still leaves nearly half its trained volunteers unutilised. In contrast, Jammu & Kashmir deployed all 555 trained PLVs (100%), showcasing effective administrative coordination. Despite a national deployment rate increase from 21.9% in 2020–21 to 36.9% in 2024–25, 63.1% of trained PLVs remain undeployed, pointing to inadequate deployment logistics or weak district-level oversight. To address this, states should establish deployment benchmarks (e.g., 50% minimum), explore linking honorariums to active engagement where feasible, and invest in digital tracking systems to monitor PLV activity, ensuring training translates into impactful community-level legal aid.

From 2020–21 to 2024–25, PLV deployment data reveals a growing concentration in institutional settings, particularly police stations, while community-

based roles in areas like village legal aid clinics or tribal outreach have seen slower growth. In 2024–25, 4,792 PLVs—25.7% of the 18,633 total deployed—were stationed in police stations, a 122% increase from 2,158 (16.4% of 13,153) in 2020–21, reflecting increased reliance on PLVs as legal intermediaries in law enforcement. Jail deployments, however, grew modestly from 1,305 to 1,848 (9.9% of total PLVs in both years), with fluctuations between 1,044 and 1,848 over the period. While the “Other Legal Services” category, encompassing community-based activities, remains the largest (9,848 PLVs, 52.8% in 2024–25), its growth (29% since 2020–21) lags behind police stations, indicating under-prioritization of preventive outreach. This trend suggests a shift from the 2009 PLV Scheme’s community-embedded vision toward a more institutional, reactive model, necessitating revised deployment strategies to balance curative legal aid with community empowerment and legal awareness.

The Para-Legal Volunteer (PLV) Scheme, designed as a community-based legal empowerment model, faced significant criticism for its ad hoc implementation in a 2020 survey of District Legal Services Authority (DLSA) Secretaries.²⁴ The survey, which included 187 participants and received 175 to 185 responses to PLV-specific questions,²⁵ revealed widespread calls for structural reform. A majority of Secretaries (59% of 183 respondents) supported transforming PLVs into a permanent cadre to enhance accountability.²⁶ Respondents also recommended merit-based selection processes, age restrictions—such as a cap of 40 years²⁷—and regular performance evaluations conducted quarterly or biannually.²⁸

The existing honorarium model, typically ₹500 per day, was frequently described as inadequate, with suggestions to replace it with fixed monthly remuneration to sustain motivation and engagement.²⁹ Secretaries also proposed area-specific deployment strategies, including assigning PLVs to each Panchayat,

²⁴ *Legal Aid System: An Assessment* (Author’s Survey, 2020) (unpublished survey data on file with the author) [hereinafter *Legal Aid System Survey*].

²⁵ *Legal Aid System Survey*, supra note 1, at 36 (175 responses to PLV-specific questions).

²⁶ Id. (“Do you think Para Legal Volunteers should be a permanent cadre?” – 59% Yes out of 183 respondents).

²⁷ Id. (Recommendation: “age limit of 40 years,” “young persons with legal background”).

²⁸ Id. (Suggestions include quarterly or six-monthly performance appraisal mechanisms).

²⁹ Id. (₹500/day honorarium described as inadequate; several suggested fixed monthly payment).

Anganwadi, or police station, to ensure better local reach.³⁰ To improve oversight and transparency, several respondents suggested implementing digital reporting mechanisms, such as ERP-based documentation, mobile tracking, and online work submissions.³¹ While responses to whether NGOs or law colleges should manage PLV functions were nearly evenly split (51.1% Yes; 48.9% No),³² the predominant qualitative feedback emphasized the need to retain PLVs while professionalizing their roles through structured training, supervision, and stronger integration with community-based justice delivery systems.³³ These findings underscore the need to reconfigure the PLV Scheme into a structured, accountable, and locally embedded institutional mechanism.

Notwithstanding its normative strength and decentralised design, the implementation of the Para Legal Volunteer (PLV) Scheme continues to suffer from systemic and structural deficiencies that have cumulatively weakened its field impact. One of the most frequently reported concerns is the irregular and delayed payment of honorarium to PLVs. Although the Scheme provides for a modest honorarium as a gesture of institutional recognition and support, disbursements in several states are neither timely nor consistent. This financial uncertainty undermines motivation, particularly in cases where PLVs must incur personal costs for mobility and documentation. In many districts, PLVs are engaged for only a limited number of days per month, often without a structured calendar or defined deliverables, leading to attrition and a gradual decline in commitment. An instructive contrast is offered by the Union Territory of Jammu and Kashmir, where PLVs are engaged throughout the year under a structured deployment model and receive an honorarium of approximately ₹10,000 per month. This arrangement has contributed to higher levels of continuity, field engagement, and accountability.

³⁰ Id. (Area-specific deployment proposed: “one PLV per Panchayat,” “per Anganwadi,” “per Police Station”)

³¹ Id. (Recommendations include “ERP-based reporting,” “mobile tracking,” and “online monitoring systems”).

³² Id. (“Do you think collaboration with NGOs/Law Colleges will result in better outcomes?” – 51.1% Yes, 48.9% No; 184 responses).

³³ Id. (Narrative feedback favoured improving and retaining PLVs rather than outsourcing the function).

In addition to honorarium-related issues, the training architecture under the Scheme remains underdeveloped. While the revised guidelines mandate structured induction and periodic refresher training, in practice, most PLVs receive only a one-time orientation with little follow-up. The absence of thematic modules—such as legal aid in disaster situations, gender-based violence, or digital service delivery—further limits their operational capacity in dynamic field contexts. Monitoring and evaluation mechanisms are similarly weak. Oversight is frequently ad hoc and limited to manual register checks or anecdotal reporting. In the absence of institutional supervision, instances have been reported where PLVs have misused their position. Such cases, while isolated, point to the urgent need for clearer accountability frameworks and grievance redressal mechanisms.

Perhaps most critically, the Scheme has seen little innovation since its inception. Despite growing complexity in welfare governance and legal entitlements, the PLV model has not been recalibrated to incorporate specialised roles, digital integration, or partnerships with other service delivery institutions. The lack of strategic revision—either in deployment protocols or engagement models—has contributed to stagnation. Without structural reforms to enhance training quality, improve honorarium administration, and embed real-time monitoring, the PLV Scheme risks becoming a static and underutilised instrument in India’s access to justice architecture.

PART- IV

Field-Based Evidence: Illustrative Impact of Para Legal Volunteers

Despite the structural limitations identified in the preceding section—ranging from skewed deployment patterns to technological and supervisory deficits—qualitative field data reveals that Para Legal Volunteers (PLVs) have made tangible contributions in contexts marked by acute vulnerability and systemic exclusion. Based on field interactions and case documentation collected between 2018 and 2021, it emerges that when adequately supported, PLVs are capable of significantly extending the reach of legal services institutions into domains traditionally outside the remit of formal legal intervention.

In Andhra Pradesh, a case documented by the DLSA Nellore illustrates the role of PLVs in uncovering and responding to regulatory non-compliance in child care institutions. During an official inspection, it was found that several children housed in a shelter had not been presented before the Child Welfare Committee as mandated under the Juvenile Justice Act. The management's resistance to scrutiny further raised concerns regarding unlawful custody. The coordinated intervention of the DLSA, involving the police, CWC, and child protection officers, led to the rescue and rehabilitation of the affected children. This instance not only underscores the preventive oversight capacity of PLVs but also demonstrates the importance of institutional coordination in achieving child-centric justice outcomes.

A contrasting but equally instructive instance from Manipur involved the identification of two orphaned youths living in precarity and working as manual labourers. A PLV attached to a Legal Aid Clinic facilitated their enrolment in the Deen Dayal Upadhyaya Grameen Kaushalya Yojana (DDU-GKY), resulting in vocational certification and formal employment. The case reflects the capacity of PLVs to act as welfare intermediaries, capable of bridging administrative gaps between entitlements and potential beneficiaries—particularly in socio-economically marginalized households.

In a case of transnational trafficking documented in Kerala, three Nepalese women were detained for possession of forged travel documents. Subsequent investigation, initiated by a PLV and supported by an interpreter and panel lawyer, revealed that the women were victims of human trafficking who had been misled by an agent promising overseas employment. Legal intervention by the DLSA led to the closure of proceedings, withdrawal of charges, and arrest of the trafficker. This case points to the critical role that PLVs can play in recognising patterns of victimisation obscured by procedural formalism, particularly where linguistic and jurisdictional barriers exist.

An initiative at the Regional Mental Hospital in Yerwada, Pune, demonstrates the potential for PLVs to contribute to post-treatment reintegration of long-stay mental health patients abandoned by their families. Through a partnership

model involving the DLSA, hospital authorities, and local employers, patients who had completed treatment were placed in jobs and provided financial and social support. The effort reoriented legal aid delivery from a litigation-centric model to one that includes socio-economic rehabilitation and reintegration, thereby aligning more closely with the rights-based framework for Rights of Persons with Disabilities.

Taken together, these field-level narratives suggest that, notwithstanding current deficits in scale and coordination, the institutional potential of PLVs as agents of inclusive justice is significant. These cases underscore the need for sustained policy attention to training quality, functional deployment, and systemic integration of PLVs within the broader access to justice framework.

PART-V

Key Lessons and Recommendations on delivering Grassroots Legal Aid

Despite India's well-intentioned statutory frameworks for grassroots legal aid through Legal Aid Clinics (LACs) and the Para-Legal Volunteer (PLV) Scheme, significant operational and structural gaps persist. Legal Services Authorities, while formally mandated to deliver decentralized justice, frequently demonstrate limited clarity or prioritization regarding the strategic importance of grassroots outreach. The result is inadequate numbers and uneven spatial distribution of Legal Aid Clinics, with a vast majority of rural and underserved areas severely underserved. Similarly, PLVs, envisioned as community-embedded facilitators of preventive legal services, remain grossly underutilized due to inadequate deployment, poor remuneration practices, and inconsistent capacity-building. Consequently, grassroots legal aid delivery often remains symbolic rather than transformative, falling short of achieving meaningful access to justice.

Moreover, the existing operational model suffers from significant infrastructural deficiencies, marked by a lack of technological integration, inconsistent monitoring, and weak accountability mechanisms. Clinics typically function in isolation, disconnected from district authorities, relying heavily on manual documentation systems that limit real-time supervision and effectiveness. Para-Legal

Volunteers, while conceptually central to legal aid delivery, frequently receive only initial training without adequate follow-up or skill enhancement tailored to emerging socio-legal challenges, severely constraining their field effectiveness. This combination of institutional ambiguity, infrastructural inadequacy, and administrative inconsistency has resulted in a pronounced gap between the normative objectives of grassroots legal aid and its actual implementation outcomes.

A particularly acute concern is the absence of clarity within Legal Services Authorities regarding the critical role grassroots legal aid plays in broader justice delivery. The absence of evidence-based programme design further weakens impact. Institutional emphasis remains largely on loosely organised awareness programmes rather than proactive, preventive legal engagement through decentralized clinics and empowered PLVs. Outreach activities are often scheduled around symbolic dates (Legal Services Day, Constitution Day) rather than actual demand patterns or local needs. Repetition of generic programmes—such as awareness camps on consumer protection or dowry laws—is common, even in areas where those issues are not predominant. Legal Services Authorities organise multiple programmes on the same theme within short intervals without evaluating community response or knowledge uptake. This symptomatic programming, driven more by reporting mandates than ground realities, stems from the absence of structured needs assessments, real-time feedback loops, or performance-linked planning. Without clear institutional prioritization, grassroots models risk marginalization, perpetuating structural gaps and limiting their potential impact. Consequently, despite statutory recognition and sustained policy articulation, grassroots legal aid in India remains fragmented, inadequately resourced, and insufficiently integrated into the wider justice system.

India's experience with grassroots legal aid delivery offers a range of operational and institutional lessons. A foremost insight is that statutory frameworks, however well-intentioned, are not self-executing—they must be accompanied by clear administrative planning, structured implementation protocols, and active institutional oversight. Decentralization, while crucial for outreach, cannot succeed in the absence of digital integration and real-time monitoring systems.

A key lesson from the functioning of Legal Aid Clinics is that their physical presence alone does not guarantee meaningful access to justice. In several districts, clinics are opened without a preliminary needs assessment of the specific legal problems prevalent in the area, leading to a mismatch between community requirements and the services offered. Clinics often remain non-functional for long durations due to the absence of regular deputation of panel lawyers or Para-Legal Volunteers (PLVs), and where deputation occurs, it is rarely linked to identified local legal needs. Without structured assignment of duties or domain-specific training, even open clinics fail to provide targeted assistance. Infrastructure-related shortcomings—such as lack of furniture, signage, or private consultation space—further discourage both community engagement and lawyer attendance. Additionally, weak monitoring and the absence of digital reporting tools allow non-performing clinics to continue unnoticed, eroding institutional credibility. The cumulative effect of poor planning, irregular staffing, inadequate facilities, and minimal oversight leads to a cycle of public disengagement, rendering the clinic a nominal presence rather than a functional justice outlet.

Equally important is the need for updated and context-relevant training. Static modules fail to equip PLVs for emerging issues like entitlements under welfare schemes, welfare legislation, disaster relief, and gender-based violence. Standardization of procedures—especially visible in jail-based legal aid clinics—has demonstrated how uniform formats in documentation, reporting, and scheduling can improve service quality, consistency, and institutional accountability.

A further critical issue is the weak correlation between PLV training and actual field deployment. When trained PLVs are left idle or assigned only sporadic duties, they tend to lose interest and gravitate toward other personal or economic engagements, thereby relegating legal aid work to a secondary role. This mismatch between training and meaningful engagement diminishes the intended community impact and leads to attrition of volunteer capacity. Deployment should therefore be benchmarked, continuous, and tied to defined field responsibilities.

Notably, localized innovations—such as Jharkhand’s integration of legal aid with welfare delivery—illustrate the value of administrative flexibility and responsiveness to community-specific needs. Collaborative partnerships with local bodies, NGOs, and civil society actors enhance credibility, broaden reach, and reduce resistance to legal aid interventions. Regular inspections and field visits by DLSA Secretaries have a visibly positive impact on documentation discipline, volunteer attendance, and issue resolution. However, in the absence of a uniform national performance evaluation framework, most of these insights remain anecdotal and unstructured, limiting the ability to replicate or scale successful interventions. Community-level feedback mechanisms—such as user satisfaction forms or suggestion registers—could significantly improve service responsiveness and help identify gaps in volunteer engagement. Clearly defined deployment calendars, specifying when and where PLVs must report, also enhance planning, accountability, and resource utilization. Infrastructure models for legal aid must remain flexible, scalable, and suited to local geography and population density rather than rely on a one-size-fits-all model.

In short, these challenges point to a broader lesson: that legal aid delivery mechanisms function effectively only when they are institutionally networked, technologically integrated, and driven by empirical feedback rather than bureaucratic routines. The relative success of jail-based legal aid clinics—supported by SOPs, structured visits by Secretaries of DLSAs, and regular inspections by District Judges—demonstrates how consistent monitoring and protocolisation can enhance outcomes. Without similar frameworks, village-level clinics and PLV deployments risk becoming symbolic outposts rather than functioning platforms of justice.

Based on these institutional lessons, several recommendations emerge. Firstly, Legal Aid Clinics should be designed not as uniform administrative replications, but as needs-responsive, locally contextualized platforms. Prior to establishing a clinic, each DLSA should undertake a systematic legal vulnerability mapping exercise in consultation with panchayats, local civil society actors, and community leaders. This will ensure that clinics are tailored to the specific legal service gaps within a given jurisdiction rather than operating on presumptive models of

demand. Secondly, clinics must be institutionally embedded within the DLSA's operational framework. Panel lawyers and PLVs should be assigned on the basis of predetermined rosters with defined functional roles. Responsibilities should be problem-specific, oriented toward resolution of categorized legal issues, and supported by minimal case documentation. Each clinic should submit monthly reports on footfall, case typology, referral outcomes, and user feedback—preferably through digital systems capable of feeding into DLSA-level dashboards. Regular inspections by DLSA Secretaries or judicial officers should be institutionalized as a mechanism of qualitative assurance. Thirdly, a collaborative management model is essential for sustainability and community embeddedness. Legal Aid Clinics can be co-located within existing institutional structures such as law universities, gram panchayat offices or women's resource centres. Partnering with local NGOs or academic legal aid societies may provide auxiliary personnel and facilities. Fourthly, digital Legal Aid Clinics and mobile units offer scalable alternatives to serve remote and underserved areas as given India's vast rural expanse, establishing Legal Aid Clinics in every village is neither practical nor cost-effective. These should be viewed as strategic supplements to a targeted network of physical clinics, enabling hybrid models of service delivery through remote consultations, case tracking, and welfare integration—without assuming a one-size-fits-all physical presence.

Further, the Para-Legal Volunteer (PLV) Scheme requires a structural redesign to ensure consistent field-level functionality. Beyond structured remuneration and periodic training, there is a pressing need to introduce minimum deployment standards—such as a fixed number of field days per month—monitored through digitally verifiable attendance systems. PLVs should be assigned geographically defined jurisdictions (e.g., a cluster of villages or urban wards) to foster accountability and community familiarity. Their responsibilities should include not only legal awareness and facilitation of legal aid applications, but also basic triaging of welfare grievances, helping bridge access gaps in entitlements.

In areas with large populations or complex legal burdens (e.g., urban slums, tribal belts, border regions), PLV-to-population ratios should be rationalized and

adjusted dynamically by the DLSAs. Moreover, a performance grading system, linked to indicators such as outreach, resolution facilitation, and reporting regularity, may be introduced to guide honorarium increments and recognition. Partnerships with local NGOs and panchayat institutions can further strengthen PLV integration by offering shared resources, referrals, and logistical support. Finally, a central digital dashboard tracking PLV deployment, activity logs, and training history would facilitate both transparency and performance benchmarking at the State and National levels.

In conclusion, there is an urgent need to recalibrate the grassroots legal aid model that restores the original vision of community-embedded, preventive, and participatory justice. This requires not only infrastructural investment and training enhancement, but also institutional reforms: real-time digital integration between LACs and DLSAs, state-specific deployment benchmarks for PLVs, performance-linked honorarium disbursement, and the design of evidence-based, issue-specific outreach modules. Grass roots legal aid in India must evolve from its current ad hoc model to a structured, sustainable system of empowerment, embedded firmly within community realities and institutional frameworks.
