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# **REAFFIRMING THE RIGHT TO A SAFE WORKPLACE: A CASE COMMENTARY ON THE SUPREME COURT'S 2024 RULING IN THE KOLKATA DOCTOR'S MURDER CASE**

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## **Introduction**

The 2024 Supreme Court decision in the murder case of a trainee doctor in Kolkata is seen as a turning point in Indian legal history with regard to gender justice and occupational safety. The horrific rape and murder of a young doctor on the campus of a government medical college in Kolkata not only brought out systemic flaws in institutional security, but also reignited discourse over the State's constitutional duty to maintain safe working conditions for women. In response to the public uproar and the case's broader consequences, the Supreme Court took a proactive approach, forming the National Task Force (NTF) on Workplace Safety in Hospitals.

## **Context and Legal Trajectory**

At R.G. Kar Medical College and Hospital in Kolkata, a 31-year-old female postgraduate trainee doctor was discovered dead in a lecture room on the hospital's campus on August 9, 2024. Further investigations found that she had been sexually abused and murdered, reportedly by Sanjoy Roy, a 33-year-old civic police volunteer with Kolkata Police.<sup>1</sup> Outrage over the tragedy spread across the nation, with medical professionals demanding for better hospital security and demanding justice.<sup>2</sup> Following numerous objections, the Supreme Court of India took *Suo moto* cognizance over the matter on August 20, 2024.<sup>3</sup>

<sup>1</sup> **The Hindu**, Kolkata Doctor Rape and Murder Case: A Package, THE HINDU (Mar. 9, 2025), <https://www.thehindu.com/news/national/west-bengal/kolkata-doctor-rape-and-murder-case-a-package/article68511993.ece>.

<sup>2</sup> **The Hindu**, Kolkata Doctor Rape and Murder Case: Government Hospitals in Delhi Begin Indefinite Strike, THE HINDU (Mar. 10, 2025), <https://www.thehindu.com/sci-tech/health/kolkata-doctor-rape-and-murder-case-government-hospitals-in-delhi-begin-indefinite-strike/article68515059.ece>.

<sup>3</sup> **The Hindu**, Kolkata Doctor Rape-Murder Case in Supreme Court: R.G. Kar Medical College Live Updates (August 20, 2024), <https://www.thehindu.com/news/national/kolkata-doctor-rape-murder-case-in-supreme-court->

Within five months of an accelerated investigation, the accused was found guilty and given a sentence. The trial court convicted Sanjay Roy of rape and murder on January 18, 2025. Following that, on January 20, 2025, he was fined ₹50,000 and given a life sentence. The court rejected the death penalty despite admitting the seriousness of the crime and ruling that it did not qualify as one of the "rarest of the rare" situations. The state administration of West Bengal, however, appealed this ruling and sought the death penalty but the convict, who has insisted on his innocence, has stated his plan to challenge the verdict.<sup>4</sup>

However, the Supreme Court went beyond individual responsibility, admitting that institutional flaws had enabled such an atrocity to occur. As a result, it created the National Task Force on Hospital Workplace Safety, which instructed state governments to put in place thorough safety protocols in all public healthcare facilities. The Court emphasized that workplace security is more than just an administrative problem; it is a basic right protected by the Indian Constitution.

### **Constitutional Analysis and Judicial Reasoning**

The Supreme Court's ruling had strong constitutional foundations, especially the Article 21 right to life and dignity. The Court upheld the earlier rulings in *Railway Board v. Chandrima Das* (2000)<sup>5</sup> and *Vishaka v. State of Rajasthan* (1997)<sup>6</sup> that workplace safety is a fundamental aspect of the right to life. This reasoning was expanded to include workplace violence in public institutions, concluding that the state had an affirmative duty to protect workers, especially women, against harassment and violence in the workplace.

In order to highlight gender justice, the ruling also cited Articles 14 and 15(3). The Court emphasized the necessity of gender-sensitive workplace security measures, acknowledging that women in medical institutions frequently work in hazardous environments, such as emergency rooms and night shifts.<sup>7</sup> By doing this, it strengthened earlier rulings and reaffirmed the idea that workplace harassment and gender-based violence compromise the fundamental rights to equality and non-discrimination. In order to specifically address workplace violence in

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[rg-kar-medical-college-live-updates-august-20-2024/article68544350.ece](https://www.newindianexpress.com/nation/2025/Jan/20/rg-kar-hospital-rape-murder-convict-sanjay-roy-gets-life-sentence)

<sup>4</sup> The New Indian Express, *RG Kar Hospital Rape-Murder Convict Sanjay Roy Gets Life Sentence* (Jan. 20, 2025), <https://www.newindianexpress.com/nation/2025/Jan/20/rg-kar-hospital-rape-murder-convict-sanjay-roy-gets-life-sentence>.

<sup>5</sup> (2000) 2 S.C.C. 465

<sup>6</sup> (1997) 6 S.C.C. 241

<sup>7</sup> Aritra Ghosh, *Workplace Safety in Indian Public Hospitals: Legal Framework and Challenges*, 10 Indian J. Clinical & Anatomical Pathology (2024)

government-run institutions like hospitals and universities, the ruling also recommended an expansion of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and called for changes to current workplace safety laws.<sup>8</sup>

The court's involvement in the enforcement of policy was arguably the most important part of the decision. The Supreme Court stepped beyond of typical adjudication and took on a more policy-driven role by requiring the establishment of a National Task Force. Although this strategy acknowledges the pressing need for workplace safety changes, it also calls into question the separation of powers and judicial overreach, issues that will be further discussed in this essay.

### **Significance and Aftermath of the Judgment**

The Supreme Court's decision has both short-term and long-term effects on gender equity and workplace safety. One of the most important steps toward institutional change was the creation of the National Task Force on Workplace Safety in Hospitals, which forced hospital administrations and state governments to review existing security measures. Following the ruling, a number of Indian hospitals strengthened visitor verification protocols, upgraded surveillance systems, and established emergency helplines for female medical personnel.

Additionally, the accused's conviction and prompt inquiry showed how well the legal system works to provide victims of workplace violence with prompt justice. The State's obligation to protect workers from violent acts was strengthened by the creation of a Special Investigation Team (SIT) for the case, which established a standard for expedited investigations in cases involving crimes at work.

But the decision's long-term viability depends on how well the Supreme Court's orders are carried out. Although the judiciary deserves praise for acknowledging the seriousness of workplace violence, the legislative and executive departments are ultimately in charge of maintaining enforcement. Legislators must develop comprehensive legislation addressing workplace violence in public healthcare and educational institutions because government institutions lack a strong legislative framework devoted to workplace security.

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<sup>8</sup> In re Alleged Rape & Murder Incident of a Trainee Doctor in R.G. Kar Med. Coll. & Hosp., Kolkata & Related Issues, Suo Motu Writ (Crl.) No. 2 of 2024 (India)



## **Judicial Reasoning and Practical Challenges**

The Supreme Court's decision raises significant concerns about judicial overreach notwithstanding its progressive attitude. The Court invaded an area that has always been the purview of the executive branch by ordering the creation of a policy-driven task force. The long-term impact of such remedies is sceptical unless they are followed by tangible legislative reforms, even though such judicial intervention is frequently appropriate in cases of parliamentary delay. Although the courts can offer short-term fixes, fundamental policy reforms carried out by the government—rather than court-ordered orders—are necessary for long-term improvements in workplace safety.

The varied application of safety regulations in different states presents another difficulty. While public hospitals in rural and poor locations would have resource limits, those in metropolitan areas might find it easier to comply with security modifications. The consistent implementation of workplace safety measures may remain a distant objective in the absence of sufficient financial and logistical support. Furthermore, the ruling does not adequately address institutional responsibility even while it concentrates on criminal accountability. Ensuring workplace safety necessitates a change in how public institutions see and implement security procedures for workers, not just the punishment of individual violators.

A notable weakness in the decision is that public institutions do not have a formal legislative framework for worker safety. Although it offers a starting point, the Sexual Harassment of Women at Workplace Act of 2013 does not fully address workplace violence in non-corporate contexts including government hospitals, academic institutions, and judicial offices. There is still a significant chance that the Court's orders won't be followed in the absence of legislative changes or a specific Workplace Safety Act.

## **Conclusion**

The Supreme Court's intervention in the case of the murder of trainee doctor from Kolkata is a major step in upholding occupational safety as required by the constitution. The ruling highlights the judiciary's dedication to gender justice and institutional accountability by reinforcing the right to a safe workplace under Article 21 and directing the establishment of the National Task Force on Workplace Safety in Hospitals. But how this decision is implemented will determine its actual effect. The decision might only be a short-term judicial intervention

rather than a long-term change in policy if there are no ongoing legislative improvements, specific workplace safety legislation, and administrative dedication.

To ensure the success of this landmark decision, the legislature must take proactive steps to develop a comprehensive workplace safety framework for public institutions. The Supreme Court's involvement in this case serves as a reminder that in order to establish genuinely safe and inclusive workplaces, structural reforms must be implemented in addition to any necessary legal actions. The only way to effectively achieve the fundamental right to workplace safety is via concerted efforts by the legislative, executive branch, and court.

