



From Policy to Practice: Assessing the Impact of the RPwD Act (2016) on the Occupational Wellbeing of Central Secretariat Service Officers

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Abstract— *The enactment of the Rights of Persons with Disabilities (RPwD) Act, 2016, signaled a watershed moment in India's legislative approach to disability, transitioning from a charity-based medical model to a human-rights-based framework. This paper critically examines the implementation and impact of this legislative mandate within the Central Secretariat Service (CSS)—the administrative and structural backbone of the Government of India. Through a comprehensive policy analysis and review of secondary data, this study assesses how statutory provisions such as "Reasonable Accommodation," non-discrimination, and reservation in promotions influence the occupational wellbeing of CSS officers. Occupational wellbeing is evaluated through a multidimensional lens: physical accessibility, professional growth, and psychological safety. Findings indicate that while significant physical and digital milestones have been achieved via the Sugamya Bharat Abhiyan and the transition to the e-Office ecosystem, systemic bottlenecks and institutional ableism persist⁷. The paper concludes with targeted policy recommendations for the Department of Personnel and Training (DoPT) to bridge the gap between policy intent and workplace reality, fostering a genuinely inclusive bureaucratic culture.*



Keywords— *Central Secretariat Service, RPwD Act 2016, Occupational Wellbeing, Reasonable Accommodation, Inclusive Bureaucracy, Institutional Ableism.*

I. INTRODUCTION

The Central Secretariat Service (CSS) functions as the permanent bureaucratic machinery of the Union Government of India. Officers within this cadre are responsible for policy formulation, continuity of administration, and the execution of legislative mandates across various Ministries housed in the North and South Blocks of New Delhi. Given the high-pressure, intellectually demanding, and hierarchical nature of the CSS, the working conditions of its officers directly impact the efficacy of national governance¹⁸.

Historically, the inclusion of Persons with Disabilities (PwDs) in the elite echelons of the civil services was restricted by narrow definitions of disability and limited

entry-level quotas under the Persons with Disabilities Act, 1995^{9,13}. However, the RPwD Act, 2016, fundamentally altered this landscape. By recognizing 21 categories of disabilities and establishing the statutory right to "Reasonable Accommodation," the Act sought to create an equitable playing field³.

Despite these progressive legal frameworks, the lived experiences of CSS officers with disabilities often reveal a disconnect between the statute and its implementation. This paper aims to investigate that disconnect. It seeks to answer a critical question: *How has the RPwD Act (2016) practically influenced the day-to-day occupational wellbeing, career trajectory, and workplace integration of disabled employees within the Central Secretariat?*

II. CONCEPTUALIZING OCCUPATIONAL WELL-BEING IN THE BUREAUCRACY

Occupational wellbeing goes beyond the mere absence of workplace hazards or the provision of basic salary benefits. The World Health Organization defines a healthy workplace as one where workers and managers collaborate to protect and promote the health, safety, and wellbeing of all workers⁵.

For a CSS officer with a disability, occupational wellbeing is conceptualized through a tripartite model:

Physical and Environmental Wellbeing: This relates to barrier-free access to government buildings, ergonomic workstations, and accessible commute options.

Professional Wellbeing: This encompasses equitable opportunities for career advancement, unbiased performance appraisals, and postings to "sensitive" or high-impact desks without prejudice.

Psychological and Social Wellbeing: This involves a sense of belonging, the development of Psychological Capital (PsyCap)—including hope, efficacy, resilience, and optimism¹²—the absence of micro-aggressions, and the existence of a supportive peer network.

When analyzing the impact of the RPwD Act, all three dimensions must be evaluated to understand the holistic employee experience¹⁹.

III. THE LEGAL AND POLICY EVOLUTION: SETTING THE CONTEXT

3.1. The Paradigm Shift of the RPwD Act, 2016

The 2016 Act brought the Indian legal framework into alignment with the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)²⁰. For central government employees, several sections are of paramount importance³:

- **Section 20 (Non-discrimination in employment):** Prohibits government establishments from discriminating against any person relating to any matter concerning employment. It explicitly states that no promotion shall be denied to a person merely on the ground of disability.
- **Section 20(2) (Reasonable Accommodation):** This is perhaps the most transformative clause. It obligates the government to make appropriate modifications and adjustments to ensure PwDs can effectively discharge their duties¹⁷.

- **Section 34:** Mandates a minimum of 4% reservation in government jobs for individuals with benchmark disabilities.

3.2. DoPT Guidelines and Judicial Interventions

The Department of Personnel and Training (DoPT) serves as the human resources arm of the government. Translating the RPwD Act into actionable rules for the CSS has required persistent judicial prodding. The landmark Supreme Court judgment in *Siddharaju vs State of Karnataka*⁴ was instrumental in forcing the government to recognize that the mandate of reservation does not stop at the entry-level.

Consequently, the DoPT issued crucial Office Memorandums extending reservations in promotions to PwD candidates up to the lowest rung of Group 'A' posts, which translates to the Under Secretary level within the CSS². This policy intervention directly impacts the "Professional Wellbeing" of disabled officers, effectively shattering the glass ceiling that previously confined many to subordinate roles for their entire careers.

IV. IMPLEMENTATION REALITIES: ASSESSING THE SECRETARIAT ECOSYSTEM

The transition from a theoretical right to a practical reality within the complex machinery of the Central Secretariat reveals a mixed record of successes and persistent challenges⁶.

4.1. The Physical Landscape: Accessibility in the Corridors of Power

The *Sugamya Bharat Abhiyan* (Accessible India Campaign) catalyzed the retrofitting of several central government buildings¹. Major structures like Shastri Bhawan, Krishi Bhawan, and Udyog Bhawan have seen the installation of ramps, tactile paving, and accessible washrooms¹⁵.

However, occupational wellbeing is often compromised by the uneven nature of this accessibility. High-security zones, heritage sections of the North and South Blocks, and inter-departmental transit routes frequently lack seamless accessibility. For an officer with a locomotor disability, navigating between different ministries for inter-departmental meetings remains a logistical hurdle that requires immense physical exertion, detracting from their primary administrative duties.

4.2. Digital Accessibility: The e-Office Paradigm

The CSS operates heavily on file movement. The transition from physical files to the National Informatics Centre's (NIC) e-Office platform has been a double-edged sword.

- **The Advantage:** For officers with mobility impairments, e-Office has drastically reduced the

need to physically transport voluminous files, thereby enhancing their efficiency and comfort.

- **The Barrier:** For visually impaired officers relying on screen readers (like JAWS or NVDA), the e-Office ecosystem has historically presented severe compatibility issues¹¹. Non-OCRed PDF attachments, complex digital signature interfaces, and non-standardized web portals violate global accessibility standards. When an officer cannot independently read a file noting due to software incompatibility, it directly undermines their professional autonomy.

V. THE EXECUTION OF REASONABLE ACCOMMODATION

In practice, reasonable accommodation within the CSS is heavily dependent on the discretion of immediate superiors and the efficiency of the Ministry's administration division¹⁰. While the provision of customized furniture or software is mandated, the procurement process is often delayed by rigid General Financial Rules (GFR). Officers report waiting months for basic assistive devices, during which their productivity and wellbeing suffer¹⁴.

Furthermore, DoPT guidelines recommend exempting PwD officers from routine rotational transfers that might uproot their established medical and social support systems. While generally adhered to, the application of this rule is sometimes viewed by peers not as an "accommodation," but as an "unfair privilege," leading to social friction.

5.1. The "Invisible" Barriers: Attitudinal and Psychological Challenges

The most significant threats to the occupational wellbeing of CSS officers with disabilities are not architectural, but attitudinal¹⁶. The bureaucratic culture, deeply rooted in traditional notions of "efficiency" and "merit," often harbors implicit biases.

5.2. Institutional Ableism and the "Soft Desk" Bias

There is a pervasive, unspoken tendency within the administration to assign PwD officers to relatively benign, low-pressure divisions (often referred to as "soft desks" or "loophole postings" like Parliamentary Assurances, Hindi Rajbhasha, or Record Rooms)⁷. While sometimes done out of a misguided sense of paternalism or protection, this practice severely curtails the officer's professional exposure. Denying disabled officers the opportunity to handle "sensitive" or high-intensity desks limits their experience, ultimately harming their prospects for merit-based promotions¹⁹.

5.3. The Stigma of Grievance Redressal

Although the RPwD Act mandates the appointment of a Grievance Redressal Officer (GRO) in every establishment³, utilizing this mechanism carries a psychological cost. CSS officers often express reluctance to file formal grievances regarding lack of accommodation, fearing they will be labeled as "difficult" or "demanding" by the administrative hierarchy. This forces many to internalize their struggles, leading to occupational burnout and decreased mental wellbeing.

5.4. Policy Recommendations and the Way Forward

To bridge the gap between the progressive vision of the RPwD Act and the daily realities of the Central Secretariat Service, a multi-pronged reform strategy is required:

- **Mandatory Digital Accessibility Audits:** The NIC must enforce strict WCAG 2.1 compliance across all internal government portals, including SPARROW and the e-Office suite¹¹.
- **Centralized Corpus for Assistive Technologies:** To bypass the delays of standard GFR procurement, a centralized, fast-tracked budgetary corpus should be established specifically for reasonable accommodation requests¹⁷.
- **De-biasing Postings and Promotions:** Human Resource divisions within Ministries must actively audit their internal posting distributions to ensure PwD officers are mentored to take up core policy desks⁷.
- **Sensitization and Inclusive Leadership Training:** The Institute of Secretariat Training and Management (ISTM) must move beyond theoretical lectures and include experiential learning modules on unconscious bias and institutional ableism.
- **Empowering the Liaison Officer:** The role of the Disability Liaison Officer must be elevated to an officer of at least the Joint Secretary rank, ensuring they have the administrative authority to implement immediate changes¹⁴.

VI. CONCLUSION

The RPwD Act, 2016, provided the necessary legal scaffolding to build an inclusive federal bureaucracy⁸. Within the Central Secretariat Service, the Act has undoubtedly catalyzed positive change, particularly in securing promotional avenues and initiating infrastructural retrofitting. However, the true measure of the Act's success lies in the occupational wellbeing of the employees it protects.

Currently, the wellbeing of disabled CSS officers is sustained more by individual resilience than by systemic facilitation. Moving from policy to practice requires the Government of India to dismantle the invisible attitudinal barriers and rigid bureaucratic processes that stifle potential. By embracing proactive accessibility, equitable career management, and empathetic administration, the Central Secretariat can transform itself into a model of inclusive governance.

VII. SUGGESTIONS

Building upon the study's findings, the following actionable steps are recommended to enhance inclusive governance within the Central Secretariat Service:

[A]- Establish Peer Support Networks: The DoPT should facilitate cross-ministry support groups to help disabled officers share lived experiences, navigate bureaucratic challenges, and build psychological resilience.

[B]- Implement Anonymous Feedback: Ministries must integrate secure, anonymous feedback portals within the e-Office system. This allows officers to report biases or accommodation delays without fearing negative impacts on their performance appraisals.

[C]- Benchmark Globally: The Indian federal bureaucracy should actively compare its disability inclusion metrics against the best practices of other Global South democracies to adopt more empathetic human resource frameworks.

[D]- Conduct Longitudinal Research: Future academic studies should track cohorts of disabled CSS officers over a five-to-ten-year period to assess the long-term effectiveness of the RPwD Act (2016) on their occupational wellbeing.

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