

Department of Telecommunications issues instructions on inclusive KYC for persons with disabilities

9 September 2025

On 31 July 2025, the Department of Telecommunications (DoT) issued instructions to telecom licensees regarding the Know-Your-Customer (KYC) process for the provision of telecom services to Persons with Disabilities (PwDs) (Instructions).

The Instructions supersede DoT's earlier directions on KYC process and have been issued pursuant to the Supreme Court's judgment in *Pragya Prasun v Union of India & Ors and Amar Jain v Union of India & Ors* (30 April 2025) (Judgment). In this landmark ruling, the Supreme Court recognised the Rights of Persons with Disabilities Act, 2016 as a 'super statute' with quasi-constitutional status. The Judgement further directed all regulators, including the Reserve Bank of India, the Securities and Exchange Board of India, and the DoT, to implement inclusive KYC frameworks for PwDs.

The Instructions mandate that the KYC process must be accessible and inclusive, ensuring that no eligible customer is denied telecom services on account of disability-related procedural barriers.

Key highlights of the instructions

1. Changes in the KYC Process

- a. Telecom licensees must inform PwD customers of all available KYC options, ie, electronic KYC (e-KYC), digital KYC (D-KYC), self-KYC and paper-based KYC. The choice rests solely with the customer.
- b. Telecom services cannot be denied on the ground of a customer's inability to complete a particular KYC process owing to a disability.
- c. For KYC processes requiring liveness detection, reliance solely on eye blinking is expressly disallowed: Telecom licensees must incorporate alternative methods.
- d. PwD certificates must be photographed and appropriately recorded at points of sale.
- e. Paper-based KYC must be made available alongside digital KYC. PwD certificate must be attached to the Customer Application Form (CAF).
- f. CAFs and databases must be updated to include PwD identification fields, specifying the type and percentage of disability.

2. Appointment of a Designated Officer

- a. Each telecom licensee must appoint a Designated Officer to specifically address enrolment-related challenges faced by PwD customers.
- b. Designated Officers are required to review automated, system-based rejections of PwD customers and may override such rejections, provided reasons are duly recorded in writing on the CAF.
- c. Telecom licensees must implement systemic checks and updates to ensure that recurring barriers in the enrolment process are identified and eliminated.

3. Grievance Redressal

- a. Telecom licensees must establish a specialised helpline or service desk within their customer support centres exclusively for PwD customers.

- b. Calls from PwD customers or inquirers must be auto-routed to the dedicated helpline, which must be staffed by trained personnel equipped with assistive technologies to provide effective support.

4. Compliance Reporting and Awareness Campaigns

- a. With effect from 1 January 2026, telecom licensees are required to submit bi-annual accessibility compliance reports, due on 1 January and 1 July each year.
- b. Telecom licensees are encouraged to organise disability awareness and sensitisation programmes to train employees and foster an inclusive service environment.

Comments

The Instructions mark a progressive and long-awaited step towards embedding accessibility within the telecom sector. At the same time, they introduce a new layer of compliance obligations for telecom licensees – particularly in light of the scale of customer interactions, the large number of on-ground point-of-sale agents, and the systemic changes required to be implemented within a one-month timeline.

By formally integrating inclusivity into the KYC framework, the DoT has repositioned accessibility as a core compliance obligation rather than a voluntary initiative. Non-compliance may trigger regulatory scrutiny and potential penalties. Conversely, early adoption will not only secure regulatory goodwill but also strengthen telecom licensees' positioning as inclusive service providers aligned with global Environmental, Social and Governance (ESG) commitments and Diversity, Equity and Inclusion (DEI) benchmarks. The requirement of mandatory bi-annual reporting further ensures that compliance will be subject to continuous oversight.

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