

Note by the Internet Freedom Foundation (IFF) on CoWin for Mr. Rajshekhar Rao

Suggestions to improve the CoWin portal for the consideration of the Delhi High Court

1. Increase number of people who can register from the current limit of 4.

Under the current CoWin system, a person can only register for 4 people. This seriously limits the number of people that can be helped by one person with access to all of the requirements.

2. Publish a data privacy policy.

Users presently must provide personally identifiable information and personal health data to the CoWin portal, without there being a data privacy policy in place.

3. Publish a separate webpage containing the FAQs for CoWin.

Presently, the FAQ page on CoWIN does not open online, and requires the user to download the FAQs as a separate file on word. This reduces the accessibility. It disadvantages users who do not have access to reliable high-speed internet services, and also users who may not have achieved complete digital literacy, or those who simply may not wish to spend the additional time to download a document to read it.

4. Alternative forms of Captcha ought to be provided using output modes for different types of sensory perception to accommodate different disabilities.

CAPTCHA renders the website inaccessible to persons with visual impairment and is in contravention of the accessibility requirements of Sections 12(4) read with 42(1) of the Rights of Persons with Disabilities Act, 2016, Rule 15 of the Rights of Persons with Disabilities Rules, 2017, Clause 6.6.3 of the Guidelines for Indian Government Websites and Apps, as well as TRAI Recommendations.

Similar ongoing cases in other High Courts:

1. *In-Re Inhuman Condition At Quarantine Centres And For Providing Better Treatment To Corona Positive* (PIL) No. 574 of 2020 - This matter before the Allahabad High Court deals with Covid relief. The Allahabad HC has [made observations](#) in relation to the vaccine availability and vaccination policy in the State of Uttar Pradesh, but has not yet dealt with the CoWin portal.

2. *Yogeeta R. Vanzara v. Union of India* PIL/11649/2021 - This matter before the Bombay High Court has been filed in relation to booking of vaccination slots through the CoWin portal. The matter has not yet come up for hearing, and no orders are presently available. However, from [news reports](#), it appears that the petition avers that vaccination slots for all age groups open only one day prior, citizens are expected to pass through this ordeal on a daily basis until they receive a vaccination slot; that economically backward sections of society who do not have convenient access to the internet are finding it extremely difficult and tedious to obtain appointments for vaccination; that the website has no facility to assist people with physical challenges; and that the servers of the platform are incapable to deal with large demands as a result of which there is delay in booking appointments. The Petition reportedly seeks directions to the Brihanmumbai Municipal Corporation (BMC) to open slots on the CoWin portal for booking vaccine at a pre-determined time with due intimation for a full week, instead of daily basis, and that vaccine slots be made available on the CoWin portal only in centres where vaccine is available. The petitioner has also prayed for a dedicated vaccine portal for Mumbai.

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