



Legal Safeguards Against Police Custodial Violence

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Abstract — Custodial violence remains one of the most persistent challenges confronting constitutional democracies, representing a direct assault on human dignity by the very institutions entrusted with protecting citizens. This paper examines the legal architecture developed in India to prevent, redress, and deter police custodial violence, tracing its evolution through constitutional guarantees, statutory provisions, judicial pronouncements, and institutional mechanisms. Drawing on landmark Supreme Court judgments such as *Nilabati Behera v. State of Orissa*, *D.K. Basu v. State of West Bengal*, and *Joginder Kumar v. State of Uttar Pradesh*, alongside recent statutory reform through the Bharatiya Nagarik Suraksha Sanhita, 2023, the paper evaluates whether existing safeguards translate into effective protection on the ground. It further examines the gap left by India's non-

ratification of the UN Convention Against Torture and the continued absence of a standalone anti-torture statute. The paper concludes that while India possesses a rich jurisprudential and constitutional framework against custodial violence, implementation deficits, weak institutional accountability, and legislative inertia continue to undermine its effectiveness.

Keywords —custodial violence, custodial torture, police accountability, Article 21, D.K. Basu guidelines, human rights, criminal justice reform

Introduction

Custodial violence occupies a peculiar and troubling place in the discourse on human rights. Unlike ordinary crime, it is violence perpetrated by the state against a person who is, at that



very moment, under the state's exclusive control and protection. The police station or the interrogation room becomes, in such cases, a site of extreme vulnerability rather than safety. Custodial violence encompasses a spectrum of abuses ranging from verbal intimidation and physical assault to sexual violence, prolonged illegal detention, and death. It strikes at the foundational premise of the rule of law: that state power is exercised within the boundaries of law and subject to accountability, not as an instrument of unchecked coercion.

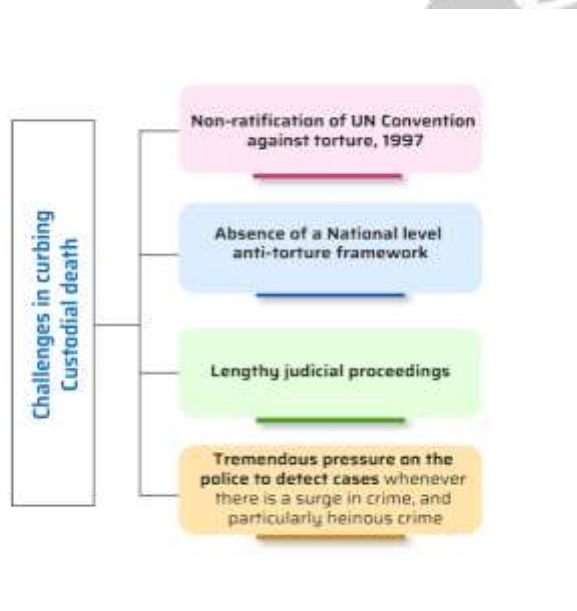


Fig. 1: Challenges in Curbing Custodial Death

Source: <https://visionias.in/current-affairs/news-today/2024-03-29/polity-and-governance/supreme-court-sc-calls-for-stricter-approach-in-granting-bail-to-police-in-custodial-death-cases>

In India, official statistics on custodial deaths have long attracted concern from human rights bodies, the judiciary, and civil society. Successive reports by the National Human Rights Commission (NHRC) and human rights organisations point to a persistent, if fluctuating, incidence of deaths and injuries in

police and judicial custody. This has generated a substantial body of constitutional and criminal jurisprudence directed at curbing such abuse. This paper undertakes a systematic examination of the legal safeguards that have developed in India against custodial violence, situating them within their constitutional foundations, statutory embodiment, judicial elaboration, and institutional enforcement, while critically assessing their practical efficacy.

The significance of this inquiry lies in the widening gap that scholars and human rights bodies have identified between the formal existence of safeguards and their actual observance. India has one of the most elaborate judicially crafted frameworks against custodial abuse of any common law jurisdiction, yet reports of custodial violence continue with troubling regularity. Understanding why this gap persists, and what further legal reform might narrow it, is the central concern of this paper.

Objectives of the Study

This study seeks to achieve the following objectives:

To trace the constitutional foundations of protection against custodial violence in India, particularly under Articles 21 and 22 of the Constitution.

To examine the statutory safeguards contained in criminal procedure law, including the recently enacted Bharatiya Nagarik Suraksha Sanhita, 2023, and their relationship to the earlier Code of Criminal Procedure, 1973.

To analyse the landmark judicial pronouncements of the Supreme Court of India that have shaped the doctrinal framework against custodial torture and death.

To assess the role of institutional mechanisms, particularly the National Human Rights Commission and State Human Rights Commissions, in monitoring and redressing custodial violence.

To evaluate India's engagement with international human rights instruments, especially the UN Convention Against Torture, and the consequences of non-ratification.



Fig. 2: Balancing Security and Human Rights in Policing

Source: <https://vishnuias.com/custodial-violence-in-india-constitutional-role-police/>

To identify persistent gaps between legal safeguards and their practical enforcement, and to propose measures for reform.

Research Methodology

This paper adopts a doctrinal and analytical research methodology. It relies primarily on secondary sources, including constitutional provisions, statutory texts, reported judicial decisions of the Supreme Court of India, reports of the

Law Commission of India, National Human Rights Commission publications, and peer-reviewed academic commentary. The study employs a qualitative, descriptive-analytical approach, examining how doctrine articulated in judicial precedent has been codified into statute and assessing, through secondary literature, the extent of implementation. The paper does not rely on primary empirical data collection such as surveys or interviews; rather, it synthesises existing scholarly and institutional findings on the implementation gap to construct an evaluative account of the current legal safeguard architecture. Case law has been selected on the basis of its recognised doctrinal significance in Indian custodial jurisprudence, and statutory analysis focuses on provisions directly bearing on arrest, detention, and custodial treatment.

Literature Review

The scholarly and institutional literature on custodial violence in India converges around several recurring themes: constitutional interpretation of the right to life and dignity, the doctrinal contribution of specific Supreme Court judgments, the codification of judicial guidelines into statute, and the persistent implementation deficit.

A foundational contribution to this literature is the Supreme Court's own jurisprudence, beginning with *Nilabati Behera v. State of Orissa*, decided in 1993. In this case, the mother of a young man who died from injuries sustained in police custody approached the Supreme Court under Article 32, and the Court held that the State bears strict liability, distinct from tortious liability in private law, for violations of the fundamental right to life under Article 21 occurring in custody. Commentary on the case, including analysis published by the National Law Institute University's *Case Analysis* series and reproduced on legal research platforms such as CaseMine, treats the judgment



as the point at which Indian courts formally recognised monetary compensation as a public law remedy for custodial death, independent of ordinary civil suits for damages. The judgment is widely cited as having established that the defence of sovereign immunity is unavailable to the State where fundamental rights are violated by its agents.

Building on this foundation, *D.K. Basu v. State of West Bengal*, reported at (1997) 1 SCC 416, is treated in the literature as the single most consequential judicial intervention on custodial violence in Indian law. The case originated from a letter written by the executive chairman of Legal Aid Services, West Bengal, to the Chief Justice of India, drawing attention to newspaper reports of custodial deaths, which the Court treated as a writ petition under Article 32. According to the account preserved on Indian Kanoon and analysed extensively in law journal commentary, the Court laid down eleven specific procedural requirements to be followed in every arrest and detention, including the maintenance of arrest memos countersigned by a witness, mandatory medical examination of the arrestee, the requirement that police personnel wear visible identification, and the obligation to inform a relative or friend of the arrested person's whereabouts. Legal commentary published on platforms such as Drishti Judiciary and Record of Law emphasises that these guidelines were treated by the Court as binding "law" under Article 141 of the Constitution until Parliament enacted corresponding legislation, and that subsequent litigation in the same matter has continued for decades to monitor state compliance, with at least seven follow-up orders issued since 1997 to press states toward fuller implementation.

A third strand of the literature focuses on *Joginder Kumar v. State of Uttar Pradesh*, reported at (1994) 4 SCC 260, which arose from the illegal detention of a young advocate by police

for several days without any formal arrest record. Academic commentary, including analysis on Lawbhoomi and Legal Vidhiya, identifies this case as the origin of the principle that the power to arrest is distinct from the justification for its exercise, and that arrest should not be a matter of routine but must be founded on a reasonable belief in both the necessity of the arrest and the complicity of the person concerned. Scholars note that this judgment anticipated, and directly informed, the subsequent statutory introduction of Section 41A into the Code of Criminal Procedure, requiring police to issue a notice of appearance in lieu of arrest for offences punishable with imprisonment of seven years or less.

The literature further traces the statutory absorption of judicial guidelines through the Code of Criminal Procedure (Amendment) Act, 2008, which came into force in November 2010 and inserted Sections 41B to 41D into the CrPC, incorporating many of the *D.K. Basu* directions, including identification requirements for arresting officers and the right of arrestees to consult a legal practitioner during interrogation. Studocu-hosted case notes and Record of Law commentary observe that while this codification represented an important legislative acknowledgment of judicial guidelines, custodial violence did not thereafter disappear, indicating a persistent gap between codified safeguard and field-level compliance.

More recent literature addresses the transition from the CrPC to the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS), which came into force on 1 July 2024. A PRS Legislative Research analysis of the BNSS notes that the new code retains and, in some respects, expands protections against arbitrary arrest, while simultaneously raising concerns, since it permits the use of handcuffs in a wider range of circumstances, including certain economic offences, arguably in tension with earlier Supreme Court directions restricting routine handcuffing. Legal



commentary examining Section 35 of the BNSS, which corresponds to and consolidates former Sections 41 and 41A of the CrPC, observes that the provision embeds the notice-of-appearance safeguard directly within the arrest provision itself and requires written reasons for arrest or non-arrest, reflecting continued judicial pressure, including the Supreme Court's more recent guidance in *Satender Kumar Antil v. Central Bureau of Investigation*, against the routine and mechanical exercise of arrest powers.

Finally, a distinct body of literature addresses India's relationship with international anti-torture norms. Multiple sources, including reporting by Outlook India, the Drishti IAS current affairs desk, and academic commentary published by the National Law Institute University's Centre for Research in Law, converge on the fact that India signed the UN Convention Against Torture (UNCAT) in October 1997 but has, as of the most recent reporting, not ratified it, placing it among a small group of states that remain signatories only. Commentary attributes this non-ratification partly to the absence of a dedicated domestic anti-torture statute, noting that the Law Commission of India's 273rd Report, submitted in 2017, proposed a draft Prevention of Torture Bill defining torture as a distinct offence and prescribing punishment and compensation, a proposal that has not yet been enacted into law. This literature frames the non-ratification of UNCAT, together with the non-enactment of the proposed torture legislation, as a significant structural gap in India's custodial violence safeguard architecture, one that persists notwithstanding India's accession to the International Covenant on Civil and Political Rights in 1979, under which the prohibition on torture and cruel treatment is independently binding under Article 7.

Taken together, the literature reveals broad consensus on two points: first, that Indian constitutional and criminal

jurisprudence has produced an unusually detailed and progressive doctrinal framework against custodial violence, arguably more elaborate than the positive statutory law of many comparable jurisdictions; and second, that this doctrinal richness has not been matched by a commensurate reduction in the incidence of custodial abuse, pointing scholars toward questions of institutional design, police culture, and enforcement rather than doctrinal insufficiency as the primary locus of continuing concern.

Constitutional Framework

The constitutional foundation for protection against custodial violence in India rests principally on Articles 21 and 22 of the Constitution. Article 21 guarantees that no person shall be deprived of life or personal liberty except according to procedure established by law, a provision that the Supreme Court has, through a long line of decisions beginning with *Maneka Gandhi v. Union of India*, interpreted to require that any such procedure be fair, just, and reasonable rather than arbitrary. Custodial torture and death have been consistently treated by the Court as violations not merely of ordinary law but of this fundamental right itself, since the right to life has been read to encompass the right to live with human dignity, a dignity that is squarely negated by torture or inhumane treatment in custody.

Article 22 supplements this protection by guaranteeing specific procedural rights to arrested persons: the right to be informed of the grounds of arrest, the right to consult and be defended by a legal practitioner of one's choice, and the right to be produced before the nearest magistrate within twenty-four hours of arrest, excluding the time necessary for the journey from the place of arrest to the court of the magistrate. These guarantees form the constitutional bedrock upon which subsequent statutory and



judicial safeguards have been constructed, and any custodial abuse necessarily implicates a breach of these provisions in addition to ordinary criminal or civil liability.

The constitutional remedy of compensation for custodial death, established through *Nilabati Behera*, further reinforces this framework by creating a public law remedy independent of the ordinary civil law of torts, allowing constitutional courts under Articles 32 and 226 to award compensation directly for the violation of fundamental rights, without requiring the petitioner to establish the more onerous elements of a private law claim.

Statutory Safeguards

Statutory protection against custodial violence in India has historically been located in the Code of Criminal Procedure, 1973, and the Indian Evidence Act, 1872, and is now substantially reorganised under the Bharatiya Nagarik Suraksha Sanhita, 2023, and the Bharatiya Sakshya Adhiniyam, 2023.

Section 25 of the Evidence Act, retained in substance under the successor evidentiary statute, renders confessions made to police officers inadmissible as evidence, a provision designed to remove the principal incentive for coercive interrogation. Sections 41 to 60 of the erstwhile CrPC, now substantially reorganised as Sections 35 to 62 of the BNSS, govern the manner, grounds, and limits of arrest. Section 41A of the CrPC, introduced by the 2008 amendment and now consolidated into Section 35(3) to (7) of the BNSS, requires police to issue a notice of appearance rather than effect arrest in cases involving offences punishable with imprisonment of seven years or less, directly codifying the principle articulated in *Joginder Kumar*. Sections 41B to 41D of the CrPC, inserted by the same 2008 amendment, mandated identification of arresting officers, the preparation of arrest memos, and the right to consult a lawyer

during interrogation, thereby giving statutory force to several of the *D.K. Basu* directions.

Section 176(1A) of the CrPC, retained in modified form under the BNSS, mandates a judicial magisterial inquiry, in addition to the ordinary police inquiry, into every death occurring in police custody, a safeguard intended to prevent the investigating agency from investigating allegations against itself. The BNSS additionally introduces mandatory video recording of search and seizure procedures and, according to commentary on its provisions, extends similar principles of transparency to certain interrogation contexts, framed as measures to enhance accountability and evidentiary reliability. At the same time, critical commentary, including analysis published by PRS Legislative Research, has flagged that the BNSS's expanded permission for handcuffing in specified categories of offences sits uneasily against earlier Supreme Court rulings restricting the practice, illustrating that statutory reform does not move uniformly in a rights-protective direction.

Judicial Pronouncements

The judiciary, and the Supreme Court of India in particular, has been the principal architect of custodial violence jurisprudence in India, frequently stepping in to fill perceived legislative vacuums. Three decisions merit particular attention.

In *Nilabati Behera v. State of Orissa* (1993) 2 SCC 746, the Court, confronted with the custodial death of a twenty-two-year-old man whose body was found on a railway track after having sustained injuries consistent with assault while in police custody, rejected the State's defence and directed payment of compensation, holding that public law liability for constitutional violations operates independently of, and does not require proof under, the principles of private law tort





liability. The Court characterised such compensation as a means of enforcing fundamental rights and providing what it termed complete justice for victims, rather than as a substitute for other proceedings, whether criminal or civil, that might independently lie against the errant officials.

In *D.K. Basu v. State of West Bengal* (1997) 1 SCC 416, the Court, acting on a letter treated as a writ petition, issued eleven specific requirements to be observed in every instance of arrest or detention, framed explicitly as an interim measure operative until Parliament legislated on the subject. These requirements included the maintenance of a register recording the identity of interrogating officers, preparation of an arrest memo attested by at least one witness, medical examination of the arrestee at the time of arrest and periodically during detention, and communication of the fact and place of detention to a friend or relative. The Court also directed the establishment of police control rooms to display information regarding arrests. The decision has generated sustained follow-up litigation over subsequent decades, with the Court repeatedly directing states to report on compliance, reflecting an unusual degree of continuing judicial supervision over a single matter.

In *Joginder Kumar v. State of Uttar Pradesh* (1994) 4 SCC 260, arising from the unexplained detention of a young advocate for several days, the Court held that the existence of a power to arrest is legally and analytically distinct from the justification for exercising it, and that arrest should not proceed merely because an allegation of an offence has been made. The Court directed that arrested persons be informed of their right to have a relative or friend notified of their whereabouts, and that police officers record, in the case diary, the specific reasons justifying an arrest.

Beyond these three central cases, subsequent decisions, including guidance in matters such as *Satender Kumar Antil v. Central Bureau of Investigation*, continue to refine and enforce these principles, indicating an ongoing judicial engagement with the practical mechanics of arrest procedure rather than a static, historically closed body of doctrine.

Institutional Mechanisms

Alongside constitutional, statutory, and judicial safeguards, India has developed institutional mechanisms tasked with monitoring and redressing custodial violence. The National Human Rights Commission, established under the Protection of Human Rights Act, 1993, is empowered to inquire into complaints of human rights violations by public servants, including custodial deaths and torture, and mandates that all instances of custodial death be reported to it within twenty-four hours. State Human Rights Commissions perform analogous functions at the state level. Human rights literature notes, however, that the NHRC's recommendations for compensation or disciplinary action against errant officers remain advisory rather than binding, and that instances of the Commission's own recommendations going unimplemented for extended periods have been documented, limiting the institution's practical deterrent effect notwithstanding its investigative reach.

Discussion and Analysis

The preceding survey demonstrates that India possesses a dense, multilayered legal architecture against custodial violence, spanning constitutional guarantee, statutory codification, and an unusually active body of judicial precedent. Few jurisdictions have developed as elaborate a judicially articulated checklist for arrest and detention as the *D.K. Basu* guidelines, and the subsequent statutory absorption of much of





this jurisprudence through the 2008 CrPC amendment and the 2023 BNSS reflects meaningful institutional responsiveness to judicial direction.

Yet a persistent theme across the literature is the gap between the sophistication of this legal framework and its observance in practice. Several structural explanations recur in scholarly and institutional commentary. First, enforcement of custodial safeguards depends heavily on the same police apparatus whose conduct is meant to be regulated, creating an inherent conflict of interest, particularly at the stage of the initial inquiry into custodial death, notwithstanding the statutory requirement of a parallel magisterial inquiry. Second, the absence of a standalone anti-torture statute means that acts of custodial violence must typically be prosecuted under general provisions of the criminal code relating to hurt, wrongful confinement, or culpable homicide, provisions not specifically calibrated to the aggravating circumstance of custodial power and control. Third, India's non-ratification of UNCAT, more than a quarter-century after signing it, leaves the country without the international monitoring architecture, including periodic reporting obligations and individual complaint mechanisms under the Convention's optional protocols, that has, in other jurisdictions, functioned as an external check reinforcing domestic accountability. Fourth, institutional bodies such as the NHRC operate with recommendatory rather than binding powers, limiting their capacity to compel disciplinary or compensatory outcomes even where custodial abuse is clearly established.

The BNSS reforms illustrate the double-edged character of ongoing legislative change: while consolidating and, in some respects, strengthening procedural safeguards such as the notice-of-appearance requirement, they simultaneously expand police discretion in other respects, such as permitting

handcuffing in a wider set of circumstances, in seeming tension with earlier judicial restrictions. This suggests that legislative reform in this domain does not move along a single rights-protective trajectory, but reflects a continuing negotiation between competing conceptions of police efficiency and individual liberty.

Conclusion

The legal safeguards against police custodial violence in India represent a substantial body of constitutional guarantee, statutory provision, and judicial doctrine, built cumulatively over more than three decades through decisions such as *Nilabati Behera*, *D.K. Basu*, and *Joginder Kumar*, and increasingly codified through legislative reform culminating in the *Bharatiya Nagarik Suraksha Sanhita*, 2023. This framework establishes clear procedural requirements for arrest and detention, provides a constitutional remedy of compensation independent of ordinary tort law, and creates institutional oversight through the National Human Rights Commission. At the same time, the persistence of custodial violence, notwithstanding this elaborate legal architecture, points to an implementation deficit rooted in institutional conflicts of interest, the absence of a dedicated anti-torture statute, and India's continued non-ratification of the UN Convention Against Torture. Meaningful progress toward eliminating custodial violence will likely require not further doctrinal elaboration, in which India's jurisprudence is already comparatively advanced, but sustained institutional reform: independent custodial death investigation mechanisms, enactment of a dedicated anti-torture law along the lines proposed in the Law Commission's 273rd Report, ratification of UNCAT, and structural measures to insulate oversight bodies from the very institutions they are tasked with supervising.





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