



Judicial Control over Police Interrogation: A Critical Study of Indian Case Law

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Abstract

Police interrogation is an essential part of criminal investigation, but it often raises serious concerns about human rights violations such as custodial torture, illegal detention, and forced confessions. Judicial control plays a crucial role in regulating police powers and ensuring constitutional safeguards. This research paper critically examines the role of judiciary in controlling police interrogation practices, with special reference to Haryana. It analyses constitutional provisions, statutory safeguards, landmark judgments, and recent developments including Human Rights Commission interventions. The study uses doctrinal and analytical methods supported by secondary data such as NCRB reports and judicial decisions. It concludes that although judicial guidelines exist, their implementation remains weak due to structural and institutional gaps.

Keywords: Police Interrogation, Judicial Control, Human Rights Commission

1. Introduction

Interrogation is crucial to criminal investigations because it helps authorities gather facts, verify claims, find missing links, retrieve evidence, and identify culprits. In theory, questioning should be a legal and professional way to acquire information without harming the person's dignity. India's reality is often different. Interrogation can lead to unlawful imprisonment, coercion, intimidation, physical violence, mental pressure, forced confession, and, in extreme cases, custodial death. This makes the issue a constitutional, human rights, and criminal procedure concern. The Supreme Court has consistently stated that arrest and custody cannot be used to punish defendants before trial. Because custody abuse was a frequent issue, the Court in *D.K. Basu v. State of West Bengal* required an arrest memo, medical examination of the arrested person, diary entry of custody details, intimation to a relative or friend, and access to legal assistance. The Court then ordered CCTV cameras in police stations and investigative offices to monitor human rights violations and increase transparency in prisons in *Paramvir Singh Saini v. Baljit Singh*.

Think broadly about custodial violence. It's not just physical agony. Verbal humiliation, threats, extended questioning, sleep deprivation, illegal imprisonment, medical denial, confession pressure, and psychological harassment are also included. These tactics violate Constitutional Articles 20(3), 21, and 22, which prohibit self-incrimination, arbitrary deprivation of liberty, and wrongful arrest. Official records show the problem's severity. The National Human Rights Commission received 2,346 intimations of judicial and 160 police custody fatalities in 2023–24 and disposed of 3,403 custodial death cases, including carry-forwards. The Commission recommended approximately ₹18.9 crore in monetary relief in 414 cases during the reporting period, highlighting the ongoing issue of custodial abuse that requires legal and administrative action.

The issue is mirrored in public and police attitude polls. The Status of Policing in India survey found that a disturbing number of police officers still embrace abusive practices. That report found that 20% of police officers thought tough measures were “very important” for creating public fear, while 35% thought they were “somewhat important.” This is noteworthy because it implies that custodial abuse is driven by both a lack of legality and a policing culture that sometimes uses force. Meanwhile, official crime statistics shows police custody deaths. NCRB data from 2022 showed 41 deaths of non-remand persons in police custody/lock-up across India, highlighting how vulnerable people are before official remand safeguards take effect. These reports and polls show that judicial control over police interrogation is real. Practicality demands it. Interrogation can easily go from investigation to intimidation, therefore the judiciary intervened. Thus, court monitoring is essential to police questioning being lawful, evidence-based, accountable, and humane.



2. Research Methodology

Nature of Study: Doctrinal and analytical

Sources of Data:

Primary: Constitution, CrPC, Evidence Act, case laws

Secondary: NCRB reports, NHRC data, journals

Area of Study: Haryana

Objective: To examine effectiveness of judicial control over police interrogation

3. Constitutional and Legal Framework

Constitutional Safeguards

The Indian constitution protects individual dignity and liberty during criminal investigations by prohibiting police power abuse during interrogation. No one accused of a crime can be forced to testify against themselves under Article 20(3) of the Constitution. This clause limits abusive interrogation because forced, pressured, or induced confessions are invalid. The Supreme Court has generally construed this right to include the right to remain silent during questioning, limiting police power. In addition, Article 21, which provides the right to life and personal liberty, has been interpreted by the courts to encompass the right to dignity, protection against torture, and fair treatment in custody. The Court has often stated that custodial violence—physical or mental—violates Article 21 and that the State must provide humane imprisonment. Article 22 requires that a person be informed of the basis for arrest, appear before a magistrate within 24 hours, and consult and be defended by a lawyer of his choice to prevent arbitrary arrest and detention. In interrogation, these rules preclude police detention and secret questioning. Articles 20(3), 21, and 22 protect lawful, voluntary, and human rights-respecting interrogation. They demonstrate that no one can be coerced to confess, tortured, or deprived of liberty without due process of law, confirming the Constitution as the ultimate check on police power.

3.2 Statutory Provisions

Law	Provision	Purpose
IPC	Sec 330, 348	Punishment for torture
CrPC	Sec 176	Judicial inquiry in custodial deaths
Evidence Act	Sec 24–25	Confessions invalid if forced
BNSS 2023	Custody rules	Regulation of detention

Forced confessions are inadmissible in court

4. Role of Judiciary in Police Interrogation

4.1 Landmark Judgments

(1) Joginder Kumar v. State of Uttar Pradesh (1994)

The judgment in *Joginder Kumar v. State of Uttar Pradesh* (1994) is a significant decision of the Supreme Court that placed important limitations on the power of the police to arrest individuals. The Court clearly held that arrest cannot be made in a routine or mechanical manner merely because it is legally permissible. Instead, the police must have a justifiable reason and reasonable satisfaction that such arrest is necessary in the given circumstances. The judgment emphasized that personal liberty is a fundamental right, and unnecessary arrest directly violates this right. The Court further stated that an arrested person has the right to inform a relative or friend about their arrest and place of detention, thereby introducing an important safeguard against secret or illegal custody. It also highlighted that arrest should be used as a last resort and not as a tool of harassment or pressure. In the context of police interrogation, this case plays a crucial role because unnecessary or arbitrary arrest often leads to custodial interrogation where the risk of abuse and coercion is high. By restricting the misuse of arrest powers, the Court indirectly ensured that interrogation practices remain lawful and humane. Thus, the *Joginder Kumar* judgment strengthened judicial control over police actions and contributed to the protection of individuals from custodial violence and illegal interrogation practices.



(2) Nandini Satpathy v. P.L. Dani (1978)

The judgment in Nandini Satpathy v. P.L. Dani (1978) is one of the earliest and most influential decisions of the Supreme Court in protecting the rights of individuals during police interrogation. In this case, the Court clearly recognized that the right against self-incrimination under Article 20(3) is not limited to courtroom proceedings but also extends to the stage of police questioning. It held that an accused person has the right to remain silent and cannot be compelled to answer questions that may incriminate them. The Court further emphasized that the police do not have the authority to force, threaten, or coerce a person into making statements during interrogation. Importantly, the judgment also acknowledged the right of the accused to consult a lawyer during questioning, thereby strengthening procedural fairness and legal protection. The Court adopted a liberal and human rights-oriented interpretation of constitutional safeguards, making it clear that interrogation must respect personal liberty and dignity. In the context of police interrogation, this case is highly significant because it ensures that all statements must be voluntary and free from pressure or compulsion. Any confession or information obtained through coercive means is considered legally invalid. Thus, the Nandini Satpathy judgment laid the foundation for modern interrogation safeguards in India and continues to serve as a key reference point for ensuring lawful and humane interrogation practices.

(3) Prakash Singh v. Union of India (2006)

The judgment in Prakash Singh v. Union of India (2006) is one of the most significant decisions of the Supreme Court in the field of police reforms, and although it was not directly related to interrogation, it has deep implications for regulating interrogation practices. In this case, the Court recognized that lack of accountability and excessive political interference had weakened the functioning of the police system, leading to misuse of power, including custodial abuse. To address this, the Court issued a series of binding directions, one of the most important being the establishment of independent Police Complaints Authorities at the state and district levels. These bodies were designed to inquire into allegations of serious misconduct by police officials, including custodial violence, illegal detention, and abuse during interrogation. The judgment also emphasized structural reforms such as fixed tenure for police officers, separation of investigation from law and order duties, and greater transparency in police functioning, all of which indirectly contribute to fair and lawful interrogation practices. In the context of interrogation, the significance of this case lies in the fact that it created an external mechanism of accountability, ensuring that victims of custodial torture or illegal questioning have a forum to seek redressal. This is particularly relevant for states like Haryana, where concerns regarding custodial practices have been highlighted in various reports. Therefore, the Prakash Singh judgment strengthens judicial control over police interrogation not by directly regulating questioning methods, but by ensuring institutional accountability and oversight, which act as deterrents against abuse of power.

(4) State of M.P. v. Shyamsunder Trivedi (1995)

The landmark State of M.P. v. Shyamsunder Trivedi (1995) case addressed police torture-related custodial death, exposing the darkest side of interrogation. The Supreme Court observed that custodial violence often occurs behind closed doors, making direct evidence against police officials impossible to obtain. The Court noted that authorities often distort records, omit facts, or manufacture false documents to avoid culpability, making custodial torture difficult to prove for victims and their relatives. The Court stressed the need for a more realistic and compassionate judicial approach to such matters, including using circumstantial evidence and drawing adverse inferences against the police where warranted. It further highlighted that guilty officers must be punished harshly for justice and to discourage future misbehavior. This ruling highlights custodial mistreatment and emphasizes the judiciary's responsibility in safeguarding people from improper acts in police interrogation. It increased judicial vigilance and accountability to prevent torture and illegal interrogation.



(5) Lalita Kumari v. Government of Uttar Pradesh (2013)

The judgment in Lalita Kumari v. Government of Uttar Pradesh (2013) is a landmark ruling that strengthened transparency and accountability in the criminal justice process by making the registration of FIR mandatory in cases involving cognizable offences. The Supreme Court clearly held that the police cannot delay or refuse to register an FIR when information disclosing a cognizable offence is received, except in very limited circumstances where a preliminary inquiry is permitted. This decision was important because, earlier, police officials often delayed FIR registration to manipulate investigations, conduct informal or coercive questioning, or avoid recording complaints altogether. By making FIR registration compulsory, the Court ensured that the investigation process begins in a formal and legally recognized manner, reducing the scope for misuse of power. In the context of police interrogation, this judgment has significant implications, as it prevents illegal detention and secret interrogation of individuals before the registration of an FIR, which was a common malpractice. It promotes transparency, ensures procedural fairness, and strengthens judicial oversight by bringing the entire investigative process within the framework of law. Therefore, the Lalita Kumari case plays a crucial role in regulating police conduct and safeguarding individuals from arbitrary and coercive interrogation practices.

5. HARYANA CONTEXT: CASE LAW AND PRACTICE

5.1 Judicial Trends in Haryana

In Haryana, the judiciary, especially the Punjab and Haryana High Court, has played a very important role in making sure that police questioning is done fairly and that people's rights are protected. The High Court has always stressed how important it is to have a fair and unbiased inquiry. It has said that the goal of a criminal investigation is not just to get a conviction, but also to find the truth in line with the law. It has frequently said that investigations must be done in a clear and legal way, and that during interrogations, no forceful or illegal methods should be used. The Court has stepped in to defend the custodial rights of accused people in a number of situations, making sure that Articles 20(3), 21, and 22 of the Constitution are not broken. The Court has also strongly opposed police misconduct, such as illegal imprisonment, custodial torture, and abuse of power. It has not been afraid to require departmental investigations, compensation, or judicial oversight when appropriate. The High Court has also highlighted the necessity to follow Supreme Court rules, such as those set down in D.K. Basu and later decisions, especially when it comes to arrest processes, medical examinations, and getting legal advice. The Court has also encouraged the deployment of new safety measures, such as CCTV cameras in police stations, to make officers more accountable in recent years. Overall, judicial trends in Haryana show an increasing commitment to balancing effective enforcement with protecting human rights. However, there are still problems with putting these ideas into practice on the ground.

6. Data Analysis and Interpretation

6.1 Custodial Deaths (India & Haryana)

Year	India Total Custodial Deaths	Haryana Custodial Deaths
2020–21	1940	49
2021–22	2544	109

(Source: NCRB compiled data)

Custodial fatalities are still one of the most alarming signs that India's police interrogation procedures are not being properly controlled. According to data from NCRB reports, the overall number of fatalities in custody at the national level rose from 1940 cases in 2020–21 to 2544 cases in 2021–22. This is a big spike in a short amount of time. In Haryana, the situation seems much worse because the number of deaths in custody went up drastically from 49 in 2020–21 to 109 in 2021–22, which is more than double in just one year. This abrupt spike plainly shows that even while there are constitutional protections, judicial rules, and laws in place, they are not being followed well on the ground. The data shows that custodial brutality and unfair interrogation methods are still happening, mostly because there is little accountability, not



enough monitoring, and judicial punishment against wrongdoers takes too long. The rise in Haryana shows that there are problems with institutional systems like proper monitoring, following arrest procedures, and following Supreme Court rules like those in D.K. Basu. It also shows that the courts and human rights organizations need to become more involved to make sure that interrogations are done in accordance with the law. So, the data trend not only shows how serious custodial abuse is, but it also shows how important it is to make protections and accountability systems stronger to stop further human rights breaches from happening.

6.2 Causes of Custodial Violence

Cause	Percentage / Observation
Lack of accountability	High
Police mindset (force justified)	~55% officers justify force
Poor legal enforcement	Significant
Delay in inquiry	Common

There isn't just one reason for custodial violence in India, particularly in places like Haryana. Instead, it's the product of many systemic and institutional problems. One of the key reasons is that people don't have to be responsible, and that number is still very high. In many cases, police officers who mistreat people in custody are not charged or face disciplinary punishment that takes a long time to happen. This makes people feel like they can get away with it. When there aren't strong or effective ways to hold people accountable, it makes it more likely that illegal activities will keep happening during interrogations. Another big reason is the way police think, where they often consider force as a necessary way to get information. According to survey-based data, such those in the Status of Policing in India Report, about 55% of police officers think that using force is okay in some cases. This shows that there is a deep-seated cultural problem with how police work. This kind of thinking immediately supports the use of forceful interrogation methods as usual.

Poor enforcement of the law makes the problem even worse. Even while there are strong constitutional protections and clear rules from the courts, they are not always followed in practice. Many police stations don't follow the rules that say they have to do things like properly document an arrest, do a medical exam, and tell family members. This makes it easier for abuse to happen. Another typical concern is that investigations and justice take too long. Investigations into incidences of assault in custody can take a long time, and sometimes evidence is lost or tampered with while they are going on. This not only makes the prosecution weaker, but it also makes victims and their families less likely to seek justice. These reasons demonstrate that custodial abuse is not solely a legal concern but a systemic issue encompassing institutional culture, enforcement deficiencies, and procedural delays. To make sure that police questioning stays legal, open, and respectful of human rights, we need to deal with these core problems.

6.3 Judicial Safeguard Compliance

Safeguard	Status in Practice
CCTV in police stations	Poor compliance
Medical examination	Partial
Legal aid	Inconsistent
Arrest memo	Often ignored

The effectiveness of judicial control over police interrogation largely depends on how well the prescribed safeguards are implemented in practice. However, ground-level realities show that compliance with these safeguards remains uneven and often inadequate. One of the most important safeguards, the installation of CCTV cameras in police stations, has seen poor compliance, despite clear directions from the Supreme Court. In many cases, cameras are either not installed, not functional, or footage is not properly preserved, which reduces transparency and weakens accountability in custodial environments. Similarly, the requirement of medical examination of arrested persons, which is meant to detect and prevent custodial torture, is only partially followed. Although medical check-ups are conducted in some cases, they are often



not thorough or are treated as a mere formality, limiting their effectiveness as a protective measure.

Another crucial safeguard is the provision of legal aid, which ensures that an accused person can consult a lawyer during interrogation. In practice, however, this remains inconsistent, especially in rural or less monitored areas, where access to legal assistance is delayed or denied. This significantly affects the ability of the accused to protect their rights during questioning. Further, the preparation of an arrest memo, which is a mandatory requirement under judicial guidelines, is often ignored or improperly maintained. The absence of proper documentation creates scope for illegal detention and manipulation of records, making it difficult to establish accountability in cases of custodial abuse. Overall, these patterns clearly indicate that while judicial safeguards are well-defined in law, their implementation remains weak. This gap between law and practice undermines the purpose of judicial control and highlights the urgent need for stricter enforcement, regular monitoring, and institutional accountability to ensure that police interrogation is conducted in a lawful and humane manner.

7. Critical Analysis

7.1 Strengths of Judicial Control

Judicial control over police interrogation in India has several strong features that have significantly contributed to the protection of human rights. One of the most important strengths is the presence of strong constitutional safeguards, particularly under Articles 20(3), 21, and 22, which provide a solid legal foundation against coercive interrogation practices. The judiciary has actively interpreted these provisions in a progressive manner, expanding the scope of personal liberty and dignity. Another major strength lies in the development of progressive case laws, where the Supreme Court and High Courts have laid down detailed guidelines to regulate arrest, detention, and interrogation procedures. These judicial pronouncements have played a crucial role in shaping fair investigation practices and limiting police excesses. Additionally, the emergence of compensation jurisprudence has strengthened accountability, as courts have recognized the right of victims or their families to receive monetary compensation in cases of custodial death or torture. This not only provides relief to victims but also acts as a deterrent against misuse of police power. Overall, judicial intervention has created a framework that promotes lawful, transparent, and humane interrogation practices.

7.2 Weaknesses

Despite the strong legal framework, judicial control over police interrogation suffers from several practical weaknesses. The most significant issue is poor implementation of judicial guidelines at the ground level. Although courts have issued clear directions, many police authorities fail to follow them strictly, leading to continued instances of custodial violence and illegal interrogation. Another major weakness is the delay in trials and judicial proceedings, which often results in justice being delayed or denied. In cases of custodial abuse, prolonged investigations and slow court processes weaken the impact of judicial intervention and reduce public confidence in the system. Furthermore, there is a serious concern regarding the lack of independent investigation mechanisms. In many cases, allegations of custodial torture are investigated by the same police department, which creates a conflict of interest and reduces the chances of fair inquiry. These weaknesses highlight that while judicial control exists in theory, its effectiveness is limited by structural and administrative challenges.

7.3 Haryana-Specific Issues

In the specific context of Haryana, certain issues further limit the effectiveness of judicial control over police interrogation. One major concern is the absence of a uniform and well-defined compensation policy for victims of custodial violence. Although courts may award compensation on a case-by-case basis, the lack of a standardized framework leads to inconsistency and uncertainty in relief measures. Another critical issue is weak police accountability, where disciplinary action against erring officials is often delayed or insufficient, thereby failing to act as an effective deterrent. Additionally, there are concerns about institutional bias in investigation, particularly when cases of custodial abuse are handled



internally by the police department. This can result in suppression of evidence, manipulation of records, or lack of impartiality in inquiry. These state-specific challenges indicate that, despite judicial efforts, effective control over police interrogation in Haryana requires stronger institutional reforms, independent oversight mechanisms, and better enforcement of existing legal safeguards.

8. Human Rights Perspective

From a human rights point of view, custodial torture is a significant breach of both international standards and constitutional protections. The Universal Declaration of Human Rights (UDHR) and the International Covenant on Civil and Political Rights (ICCPR) are two examples of international laws that clearly say torture and treatment that is cruel or degrading are not allowed. Article 5 of the UDHR makes it clear that no one should be tortured or treated or punished in a cruel, inhuman, or humiliating way. The ICCPR also strengthens these protections. These international responsibilities require the State to make sure that law enforcement, including police questioning, is done in a way that is both humane and legal.

At the national level, custodial torture directly violates the basic rights protected by the Indian Constitution. This includes the right to life and personal freedom under Article 21, which includes the right to live with dignity and be safe from physical and mental harm. It also violates Article 20(3), which protects people from self-incrimination because torture is commonly used to get people to confess. Even though India has strong laws and human rights, one big problem is that there is no explicit law against torture. India has joined international treaties banning torture, but it hasn't made a full domestic law that clearly makes custodial torture a crime and deals with it. This loophole in the law makes it harder to enforce, since the general criminal law doesn't always cover the specific character of custodial abuse. Because of this, accountability is still restricted, and victims typically have a hard time getting justice. So, from a human rights point of view, it is important to enhance legal systems and make sure they are strictly followed to stop custodial torture and protect people's rights and dignity during police questioning.

9. Findings of the Study

The results of this study clearly show that India has a strong legal and constitutional framework for regulating police questioning, but it is not being used consistently or effectively in practice. First, it is clear that there are detailed judicial guidelines, such those set by the Supreme Court, but they are not being followed very well on the ground, especially in police stations where it is hard to keep an eye on things. Second, the situation in Haryana is worrying because custodial infractions have been on the rise in recent years, showing that there are problems with enforcement, supervision, and accountability. Thirdly, the study shows that the way victims of custodial abuse are compensated is not complete or fair. This is because there is no standard policy that guarantees prompt and adequate relief, which makes the delivery of justice unclear and unfair.

The research also shows that the culture of the police still supports using force to get information, even though the law clearly says it is illegal. This indicates a more profound institutional problem that cannot be addressed solely through legal measures. Finally, it is clear that judges usually only step in when there is already abuse in custody, not to stop it from happening. Instead of making sure that violations don't happen in the first place, courts normally intervene in after they happen. In general, these results show that the courts have done a good job of preserving rights, but we need tougher enforcement, changes to the way things are done, and more preventive measures to make sure that police questioning is always legal, open, and fair.

10. Suggestions

1. There is an urgent need for a dedicated law in India that clearly defines custodial torture, prescribes strict punishment, and ensures accountability of police officials. This will strengthen enforcement and provide better protection to individuals during interrogation.
2. Supreme Court guidelines, especially those related to arrest and interrogation procedures,



must be strictly followed at all levels. Regular monitoring and disciplinary action should be ensured in cases of non-compliance.

3. Cases of custodial violence should be investigated by independent agencies rather than the same police department to ensure fairness, transparency, and impartiality in inquiry.
4. All police stations and interrogation rooms must have functional CCTV cameras with proper recording and storage systems. Regular audits should be conducted to ensure compliance.
5. Police personnel should be given regular training on human rights, ethical interrogation techniques, and legal safeguards to reduce reliance on coercive methods.
6. A standardized compensation framework should be established at the state level, especially in Haryana, to ensure timely and fair relief to victims of custodial violence and their families.
7. Fast-track mechanisms should be introduced for cases involving custodial violence, and strict action should be taken against guilty officials to create deterrence and improve public trust in the justice system.

11. Conclusion

In conclusion, the study clearly shows that judicial oversight over police questioning in India, including in Haryana, is well-developed at the theoretical and legal levels but still needs a lot of work in practice. The Constitution of India, bolstered by progressive judicial interpretations and historic rulings, establishes a robust framework to safeguard persons from coercive and unlawful interrogation methods. Courts have always stressed the significance of respect, fairness, and due process. They have also made clear rules for how to arrest, hold, and question people. But even with these clear protections, the reality on the ground shows that there is still a gap between the law and how things are done. This disparity is mostly caused by problems with the system, like a lack of effective accountability measures, bias in investigative agencies, delays in the courts, and an outmoded police mentality that still tries to rationalize using force to investigate.

The situation in Haryana makes these problems even worse. There are more and more cases of custodial infractions, and the rules aren't always followed, which shows that institutional improvements are needed. Judicial involvement, while important, is typically reactionary, meaning it only happens after a violation has already happened. It doesn't stop them from happening in the first place. Therefore, for real and lasting change, judicial control needs to be backed up by strong legislative measures, like the passing of a specific anti-torture law, as well as administrative accountability, which includes independent investigation mechanisms and strict punishment for officials who break the law. Simultaneously, there is a necessity for capacity enhancement and awareness-raising among police professionals to foster ethical and rights-oriented interrogation methodologies. For openness and accountability to work, the public needs to be aware of them and civil society needs to be involved. In the end, the only way to make sure that police questioning in India is truly legal, humanitarian, and in line with constitutional and human rights standards is to work together with the courts, the legislature, the executive, and society.

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