

Police Atrocities and Human Rights in India

Bipini Chandra Mallik

Research Scholar, Department of Public Administration, Utkal University, Bhubaneswar, Odisha, India

Abstract: *Creating a dependable and skilled police force is essential for ensuring public safety and addressing concerns effectively. India lacks a police force of this calibre, as supported by concrete evidence from many committees, human rights commissions, media reports, and firsthand experiences of residents who have witnessed crimes. It is widely acknowledged that the police force is in dire need of essential reforms. Two separate components of police reform must be executed at the same time. reform must be implemented concurrently.*

Keywords: Brutality, Atrocities, Crime, Prevention, Consequences, Torture, Police Custody

1. Introduction

Among society's most vital institutions, the police force stands tall. Because of this, the police officers are the most obvious government representatives (Bittner, 1970). During times of crisis, when citizens are unsure of who to contact or what to do, the police station and officers are the most accessible and suitable units for them (Eubanks, 2018). Every community looks to its police force to be the most approachable, participatory, and ever - changing institution (Wals & Vito, 2018). The diversity and complexity of their societal roles, functions, and responsibilities is to be expected. The police force's dual responsibilities include enforcing the law and keeping the peace. These two tasks, however, have far - reaching consequences, necessitating a comprehensive list of the police department's roles, functions, authorities, and responsibilities (Bowling et al., 2019). Although police need a wide range of powers to carry out their tasks, this also opens the door for abuse and, ultimately, human rights violations (Sikkink, 2011). Powers of the police, instances of abuse of authority, legislative oversight, and judicial review of police actions are all topics that will be covered in this article.

Definition of Police

No state police act defines "police," and neither the Criminal Procedure Code nor the Police Act of 1881 define it; these acts just outline the organisational framework of state police forces.

According to Black's law dictionary, "police" is defined as (1) "the government agency tasked with maintaining law and order, ensuring the safety of the public, and combating and detecting criminal activity." Furthermore, "the officers or members of this department."

In the 1820s, Sir Robert Peel formed the first municipal force in London, marking the beginning of the modern police force in England. Volunteers or sliders in the military had previously handled police duties.

"Law enforcement officials" is defined in the United Nations Code of Conduct for those in the profession. That is to say, all elected or appointed authorities who have the authority to arrest or detain someone, as well as all military members who have that authority, regardless of whether they are assigned a police uniform or not.

To put it simply, the term "police" refers to any individual or

organisation established by the state with the mission and authority to uphold law and order, as well as to investigate and prevent criminal acts.

International Commitments

The UN Charter, International Covenants on Civil and Political Rights, and International Covenant on Economic, Social, and Cultural Rights indicate that human rights and basic freedoms are among its main aims.

UDHR Article 3 guarantees life, liberty, and security to all. Life is an intrinsic human right, according to ICCPR Article 6 (1). Law will protect this right. Life cannot be taken without cause. According to Article 5 of the UDHR, torture, harsh, violent, or humiliating treatment or punishment are prohibited.

Additional due process and effective redress for basic rights abuses have been guaranteed. Article 9 of the Declaration prohibits arbitrary arrest, detention, or expulsion. Every person has the right to a public and fair hearing before an impartial and independent tribunal to determine his rights and obligations and criminal accusations. Every criminal defendant has the right to a public trial with all necessary defence protections and is innocent until proven guilty. No one may be convicted of a crime for doing something legal at the time, domestically or globally.

Article 7 of the ICCPR further provides:

Torture and other inhumane treatment are prohibited. In particular, medical or scientific investigations without consent are prohibited.

As mentioned, everyone has the right to personal freedom and security. Arresting someone without probable cause is wrong. No one's liberty may be taken without legal grounds and methods. Equal opportunity in court is also maintained.

A code of conduct for law enforcement officials, a convention against torture and other cruel, inhuman, or degrading treatment or punishment, a declaration on the protection of all persons from torture, and minimum prisoner treatment rules exist. Torture and other inhumane treatment are prohibited. In particular, medical or scientific investigations without consent are prohibited.

As mentioned, everyone has the right to personal freedom and security. Arresting someone without probable cause is

Volume 13 Issue 7, July 2024

Fully Refereed | Open Access | Double Blind Peer Reviewed Journal

www.ijsr.net

wrong. No one's liberty may be taken without legal grounds and methods. Equal opportunity in court is also maintained.

A code of conduct for law enforcement officials, a convention against torture and other cruel, inhuman, or degrading treatment or punishment, a declaration on the protection of all persons from torture, and minimum prisoner treatment rules exist.

2. Nature and Extent of Police Atrocities

It would appear that the very people tasked with upholding the law have turned into lawbreakers themselves, as a result of the twenty years of persistent police violence and torture. The harshness and use of third - degree methods by the police, together with their emphasis on a lathi - wielding attitude, became the norm after the 1980s. A number of examples of human rights breaches include the increasing number of brutal police actions.

1) Police atrocities during emergency:

A satyagrahi was arrested by the police in March 1976 during the emergency period, but no charges were filed against him. During his brief illegal detention, he endured numerous forms of physical abuse, including stamping on his naked body with heeled boots, beating his bare feet with a cane, striking his spine, and beating him with a rifle while inserting live electric wires into his body's crevices. He was also burned with lighted cigarettes and candle flames. Once a squad of ten or twelve constables in Kerala began stripping inmates down to their pants and beating them, the brutality of the police brutality reached a new low point. While in detention, no one was given any food. They were transferred from station to station instead of brought before a magistrate if the physical evidence of abuse was too glaring. During the state of emergency, Madhya Pradesh had the highest concentration of convicts in its prisons. Political detainees were housed in the Gwalior district jail alongside infamous dacoits, who were permitted to mistreat them.

2) Nature of police atrocities - after eighties:

So that victims of police brutality would never know what happened to them, the police have resorted to increasingly harsh tactics since 1980. The cops even subjected children to brutality. Inmates would be supplied with young boys for sexual pleasure; some of these boys would be tortured to the point of impotence, hung upside down, brutally beaten, shocked, etc. In order to coerce confessions, brutal measures were utilised.

Torture:

India has a lengthy history of police brutality and torture, which is a well - known reality. When questioning someone accused of minor offences, such tactics are commonly employed by law enforcement. The police resort to horrible forms of physical violence against those they suspect in order to coerce confessions or intimidate them. While there have been reports of beatings in jails, torture has reportedly occurred in police stations as well.

Death in police custody:

The number of people dying while in police custody increased dramatically after the 1970s. To get information out of them

or to teach them a lesson, torture is frequently to blame for these kinds of deaths.

Atrocities against women:

Two police officers in the Chandrapur district of Maharashtra, India, committed the custodial rape of a young tribal girl named Mathura on the grounds of the Desai Ganj Police Station on March 26, 1972. In the case of *Tukaram Vs. State of Maharashtra*, the Supreme Court determined that the girl did not struggle and that the incident was a "peaceful affair" because she did not sustain any physical injuries. The Criminal Law (Second Amendment) Act 1983 (No.46) amended the Indian rape statute in response to public anger and protests following the Supreme Court's acquittal of the accused.

3) Rights Interpreted by The Court:

a) Right to remain silent:

Adversarial trials in India hold defendant innocent until proven guilty beyond a reasonable doubt. In this system, the prosecution and police must prove guilt beyond a reasonable doubt, so they use unscientific methods like torture, threats, assault, harassment, etc. to coerce confessions, evidence, and information. Accused parties can talk or stay silent. However, the Indian constitution doesn't guarantee silence. Article 20 (3) bans self - incrimination in criminal cases. The Supreme Court interpreted Article 20 (3) 's right to remain quiet as implied.

In *M. P. Sharma v. Satish Chandra*, the court found that an individual may claim protection as a "accused of an offence" under article 20 (3) if their name was in the original information report and the police investigated.

b) Right to Fair Investigation:

The Supreme Court of India reaffirmed in the case of *Babubhai v. State of Gujarat* that the rights provided by articles 20 and 21 of the Indian Constitution include the right to a fair trial as well as a fair investigation. The Supreme Court has often held in cases like *Babubhai* and *Abdul Rehman Antbulay* that the accused have a constitutional right to a prompt investigation since a prompt trial depends on a prompt investigation. A guarantee to a quick trial in the Constitution would be useless if this were not the case.

c) Arrest:

The police's vast discretionary powers and genuine abuse of them make arrests another problematic part of the criminal justice system. In their third report, the national police commission determined that 60% of arrests were warrantless and that police corruption was fuelled by the ability to arrest.

The Indian Supreme Court has noted in multiple cases that the police do not follow the procedures laid out by the Criminal Procedure Code and the Constitution of India, even when an arrest is required. The petitioner in *Bhim Singh v. State of Jammu and Kashmir* was a member of the legislative assembly who was unlawfully barred from attending sessions by virtue of his arrest, detention in police custody, and subsequent release. The petitioner was awarded compensation by the Supreme Court, which determined that the police authorities behaved wilfully.

d) Handcuffing:

Even though the individual being handcuffed and his family may endure shame and humiliation as a result of the arrest, the police often feel that handcuffing is necessary to execute the arrest. The Supreme Court ruled in the case of Prem Shankar v. Delhi Administration that handcuffing is clearly cruel, irrational, and excessively severe and should only be used in rare cases where there is a legitimate fear that the prisoner may try to escape.

The court observed: It seems cruel and arbitrary to put someone in handcuffs because it seems inhumane. To use zoological tactics that are contrary to article 21 in the absence of fair process and impartial scrutiny is to impose shackles. There must be a compromise between the divergent goals of preventing the prisoner's escape and safeguarding his dignity from brutality. It is not possible to criticise the public interest, reason, or justice in and of itself the decision to prohibit an accused from escaping from justice. But it is cruel, degrading, vulgar, and vile to bind a man hand and foot, fetter his limbs with steel hoops, drag him down the streets, and stand him for hours in the courts.

e) Torture and death in police custody:

Torture is not explicitly forbidden in India's constitution. But the highest court in the land has interpreted Article 21 as outlawing torture. According to the Supreme Court's ruling in Francis Coralie Mullin v. Union of India, "now obviously any forum of torture or cruel inhuman or degrading treatment would be offensive to human dignity and constitute an intrusion into this right to live. It would on this view be prohibited by Article 21 unless it is in accordance prescribed by law. However, no law that authorises or implements such a procedure can ever stand the test of reasonableness and non - arbitrariness. It would plainly be unconstitutional and void as it violates articles 14 and 21. "

f) Fake Encounter:

Police brutality and arbitrary killings in phoney encounters are another human rights violation. In People's Union for Civil Liberties v. Union of India, the Supreme Court recognised Article 21's right to life. The court found that the Imphal police officers' fake encounter killing of two people violated this right and that sovereign immunity did not apply. The defendants of each deceased individual received one million rupees.

Constitutional Rights:

Those who are taken into custody have specific protections outlined in the Constitution, including:

- 1) The right to know the arrest reason quickly,
- 2) To consult and be defended by a counsel of his choosing,
- 3) Right to appear before a magistrate within 24 hours
- 4) Freedom after 20 hours if not brought before a magistrate.

4) Right to know the grounds of arrest:

In order to determine if his arrest was arbitrary and to formulate a defence, a person must be informed of the basis for depriving his liberty promptly upon being arrested. According to Article 22, the arresting authorities must inform the detained individual of the reason for their detention as quickly as possible. According to the Supreme Court's

decision in Re Madhu Limaye, article 22's purpose is to give the accused individual as much time as possible to clear up any confusion or misunderstanding that may have led to their arrest. The chance to prepare for court and hire an attorney to represent him presents itself to him. Article 22 (1) so enshrines the essential protections of an arrested person's personal liberty.

5) Right to consult a lawyer:

One protection against arbitrary detention is the right to counsel, as stated in article 22 of the constitution. As the Supreme Court ruled in the D. K. Basu case, an individual facing arrest has the right to request the right to counsel from the authorities. It states that the suspect may be allowed to see his attorney while being interrogated, but not during the entire process.

6) Right to be produced before a magistrate:

If the offender is not produced before a Magistrate as required by Article 22 (2), the police official may be charged with wrongful detention under Indian Penal Code 340. In Khatri v. State of Bihar, the highest court in India stated that the government and police must strictly enforce the constitutional and legal mandate to bring an arrested person before a judicial magistrate within 24 hours. The court also remarked that the ban on detention without remand is a sensible measure that permits the magistrate to oversee the police investigation and should be enforced and punished harshly when broken.

Article 22 (2) provides that an arrested individual has the right to be produced before a magistrate as a safeguard, regardless of whether the inquiry cannot be finished within twenty - four hours. Police cannot hold a someone for more than twenty - four hours without first taking them before a magistrate, as this practice is considered unlawful. Even though this is the way the constitutional mandate reads, in practice, people are constantly complaining about police brutality and unlawful detention.

Police brutality & rule of law

The three pillars of a just legal system are judicial pre - eminence, judicial equality, and legal protection for all citizens. According to proponents of the rule of law, the rule of law itself is superior, and punishment is reserved for those who disobey it. As a violation of human rights, he will face punishment in accordance with the due process of law; furthermore, the rule of law forbids the use of criminal force against an accused individual. When police brutality occurs, it does not adhere to the legal standards of due process.

In Kishore Singh Ravinder Dev v State of Rajasthan (1980), Justice Krishna Iyer stated that our nation is not dictatorial even in prison. Paragraphs 14, 19, and 21 apply in prison. The state must retrain the constabulary away from sadistic arts and promote respect for human rights. Nothing tears at our constitutional culture more than a state official going ballistic without regard for human rights. If the lower echelons are to follow, the higher echelons must lead by example.

Human rights and police brutality

Despite the police's reputation as vital guardians of the public, thousands of incidents exist in which officers' use of force violated fundamental human rights. Officers abuse their

authority when they act harshly and quickly in response to pressure from several quarters to produce instant and satisfactory outcomes. Since the body's primary function is to protect the people, the brutality with which a police officer treats an accused person while in police custody is morally reprehensible. These heinous crimes violate Article 21 of the Indian Constitution, which guarantees everyone the right to exist.

It is difficult to prove police cruelty in court, even when the victim claimed it. The victim was not injured during the examination in the 1978 Mathura rape case, where police officers committed custodial rape. There was no evidence that she resisted their sexual advances. The police constables were found not guilty by the Apex Court because her sexual intercourse while in captivity did not constitute rape according to Section 376 of the IPC, 1860. Because of this case, a crucial regulation states that female suspects cannot be summoned to the police station between the hours of sunset and daybreak.

The National Human Rights Commission was established on October 12, 1993, under the Protection of Human Rights Act, 1993, to address the alarming rise in custodial violence, rape, and other horrific crimes. Although it has the authority to investigate matters brought to its attention through petition or "suo moto," the Commission is only an advisory and recommendation body. If the government engages in unlawful behaviour, the NHRC can take legal action. If it determines that a human rights violation has occurred, it can step in to stop the legal process. The Committee is responsible for overseeing the police and issuing regulations that must be adhered to.

Recommendations by NHRC

Several adjustments to the police force were suggested by the National Human Rights Commission. What makes them

- Preventing unfair administration by shielding police officials from political demands.
- Establishing a State - level entity known as the Police Security and Integrity Commission (PSIC) to resolve instances where personnel are allegedly compelled to carry out unlawful directives by their superiors and to raise standards for police work.
- A new non - statutory entity to handle public complaints about police authority abuse, the "District Police Complaints Authority," should be established.
- Constitutional courts have enormous influence over police abuse. The court system can reduce police violence by taking these steps:
 - Putting cameras in police stations and turning over the film to the right people so they may evaluate the officers' performance and how they handle complaints.
 - It is only fair that police officers face jail time or other punishments that would make them respect court rulings.
 - In order to ensure that the footage and the diary are consistent, it is required that the personnel of the police station keep a diary and provide a copy to the district complainant authority every two months.
- In order to prevent police brutality, it is necessary to periodically inquire about the complainants' experiences with the officer.

- A clear provision should be in place to ensure that people are informed of their rights whenever they interact with police officers.
- The police are required to wear indestructible body cameras while they transfer an accused person from one location to another, and the footage from these cameras must be kept until the court rules on the issue.

Landmark cases of police atrocities

Rudul Shah vs. State of Bihar (1983)

After the court acquitted the petitioner in this instance, he remained in custody for more than fourteen years. The petitioner was seeking restitution for the unlawful confinement he endured. The Bihar Government was compelled to pay ₹30, 000 and ₹5, 000 by the Supreme Court, which concluded that the imprisonment was completely unwarranted.

Joginder Kumar v. State of UP (1994)

The petitioner in this case was a lawyer, and the facts were that the police officers who summoned him for questioning unlawfully detained him. The police provided false information about the petitioner's location when his family members wanted to know where he was. The detention was deemed unlawful by the Court.

D. K. Basu v. State of West Bengal (1996)

Police brutality and custodial abuse were acknowledged by the Supreme Court in the D. K. Basu case. Custodial violence is an assault on the dignity of an individual, according to the Apex Court. In this case, the court outlined many procedures that law enforcement must adhere to before making an arrest.

- When making an arrest or questioning a suspect, police officers must wear name tags that indicate their position.
- A family member or other reputable individual in the area is required to attest to a duplicate of the completed arrest memo. The arrestee's signature and the date and time of arrest are required on the memo.
- He is required to notify a friend, relative, or anybody else concerned about his well - being of his arrest and where he is being held if no one from his immediate family is present when he is taken into custody.
- Everyone who takes an individual into custody has a right to know that they can tell someone about their arrest.
- The relevant police station's logbook must be updated with the following details: the time and date of the arrest, the individual notified of his arrest, and a roster of officers who were in charge of the detainee.
- Both the arrestee and the police officer are required to sign a document detailing any injuries sustained by the person being arrested.
- The arrestee is required to undergo a medical examination by a doctor every 48 hours while in jail.
- The Magistrate must get all document copies.
- Within twelve hours, the arrest must be communicated to the relevant district's police control centre.

Prakash Singh v. Union of India and Ors (2006)

Here, petitioner Prakash Singh sought police reforms through a Public Interest Litigation filed with the Supreme Court after his retirement as director general of police in the state of UP.

Every state and union territory is required by the Supreme Court to obey certain provisions, which are

- Each position, such as Director General of Police or Inspector General of Police, has a set term of office.
- The Court ordered the creation of Police Establishment Boards (PEBs), which will have the authority to assign and transfer police officers, in order to prevent political interference with the police force.
- A State Police Complaints Authority (SPCA) should be set up so that regular citizens who are unhappy with the police can go to them with their complaints.
- While not every state strictly adhered to the Supreme Court's ruling in this case, 18 of them have taken steps in the right direction by either updating or passing new police legislation.

Paramvir Singh Saini v. Baljit Singh & Ors (2020)

The petitioners in this case beseeched the court to review and provide instructions on the matter of closed - circuit cameras being installed in police stations by filing a Special Leave Petition. In the Shafhi Mohammad and D. K. Basu cases, the Supreme Court ordered states to set up surveillance cameras, even though the court did not find it necessary to do so. The Supreme Court issued a series of directives in this case outlining various standards and principles:

- Each district and state will establish its own oversight committee.
- Each state is required to establish a human rights commission. Vacancies will be filled in the order they are received.
- Surveillance cameras equipped with night vision and audio recording capabilities are standard equipment at all police stations.
- To ensure that no area is left vulnerable, it is imperative that CC cameras are strategically placed throughout the building, including all entrances, exits, corridors, and lock - ups.
- For a period of 18 months, the footage will be accessible.
- While the police are at the station, they should post notices alerting the public to the fact that they are under video surveillance, and the community at large should be made aware of this fact.
- The Central and State Finance Ministries will provide adequate funding to carry out the directives.

Concluding observations

One of the most terrible crimes committed by those in power is police brutality. The courts have the authority to inflict severe penalties and terminations on law enforcement agencies that do not comply with their directives. Both houses of parliament and the federal government need to enact anti - torture legislation to put a stop to these heinous crimes. Atrocities committed by police, including as beatings, unlawful imprisonment, rape, and even torture leading to death, are on the rise and show no signs of abating. The government needs to take action and issue directives to put a stop to these unlawful occurrences. Additionally, all police stations should be equipped with CCTVs, and the recordings should be presented to a competent authority for verification of any law enforcement actions taken. Someone has to be in charge of holding the head of a police station accountable for what happens there. If India's rule of law and its inhabitants are to be safeguarded from police violence, an exhaustive

investigation and a thorough evaluation of the current legislation are essential.

Alternately, we can do all in our power to enhance and fortify law enforcement within the bounds of the current framework. Improving the living and working conditions of lower - ranking police officers should be a top priority, right up there with boosting the stature of the constabulary and enhancing standards for recruiting, training, and leadership.

References

- [1] Agarwal, H. O., (2016), *International Law and Human Rights*, Hyderabad, Central law publication.
- [2] Barlow, D. E., & Barlow, M. H. (2018). *Police in a multicultural society: An American story*. Waveland Press.
- [3] Bowling, B., Reiner, R., & Sheptycki, J. W. (2019). *The politics of the police*. Oxford University Press, USA.
- [4] Bittner, E. (1970). *The functions of the police in modern society: A review of background factors, current practices, and possible role models*.
- [5] Basu D. D, (2003) *Constitutional Law of India*, New Delhi, Wadhwa & Company.
- [6] Caldero, M., Dailey, J., & Withrow, B. (2018). *Police ethics: The corruption of noble cause*. Routledge.
- [7] D. K. Basu v. State of West Bengal, (1997) (1) SCC 416
- [8] Eubanks, V. (2018). *Automating inequality: How high - tech tools profile, police, and punish the poor*. St. Martin's Press.
- [9] Hall, D. J. (1975). The Role of the Victim in the Prosecution and Disposition of a Criminal Case. *Vand. L. Rev.*, 28, 931.
- [10] Hart Jr, H. M. (1958). *The aims of the criminal law*. *Law & Contemp. Probs.*, 23, 401.
- [11] Joginder Kumar v. State Of Uttar Pradesh (1994) 4 SCC 260;
- [12] Krishanmoorthy, S. Dr. (1994) *Human Rights and the Indian Police*, Banglore, RR Publishers.
- [13] Mahoney, M. R. (2013). Victimization or oppression? Women's lives, violence, and agency. *In The public nature of private violence (pp.59 - 92)*. Routledge.
- [14] Pandey, J. N, (2016), *Constitutional Law of India, Allahabad*, Central Law Agency
- [15] Paranjape, N. V, (2008) *Criminology and Penology 13th edition*, Allahbad, Central Law Publishing House.
- [16] Rai Vikas Narayan, (2007) *Third Degree Police*, Haryana Police Academy, Karnal.
- [17] Ristroph, A. (2017). *The constitution of police violence*. *UCLA L. Rev.*, 64, 1182.
- [18] Rudul Shah v. State of Bihar (1983) AIR 1086, (1983) SCR (3) 508
- [19] Runkle, G. (1976). *Is violence always wrong? The Journal of Politics*, 38 (2), 367 - 389.
- [20] Sharma, P. D, (1985) *Police and Criminal Justice Administration in India*, New Delhi, Uppal Publishing House.
- [21] SINGH, U. (1994). Custodial Violence In Modern India. *Journal of the Indian Law Institute*, 36 (3).
- [22] Sikkink, K. (2011). *The justice cascade: How human rights prosecutions are changing world politics (the*

Norton series in world politics). WW Norton & Company.

- [23] Skinnis, L. (2012). *Police custody: governance, legitimacy and reform in the criminal justice process*. Willan.
- [24] Smt. Nilabati vs. State of Orissa AIR (1993) SC 1960
- [25] Steiner, H. J., Alston, P., & Goodman, R. (2008). *International human rights in context: law, politics, morals: text and materials*. Oxford University Press, USA.
- [26] Torrey, P. L. (2014). *Rethinking Immigration's Mandatory Detention Regime: Politics, Profit, and the Meaning of Custody*. U. Mich. JL Reform, 48, 879.
- [27] Tukaram v. State of Maharashtra, (1979) 2 SCC 143
- [28] Walsh, W. F., & Vito, G. F. (2018). *Police leadership and administration: A 21st - century strategic approach*. Routledge

Websites

- [29] <http://www.uncat.org/wp-content/uploads/2020/06/INDIATORTURE2019.pdf>
- [30] <https://ncrb.gov.in/hi>
- [31] <https://www.sabrangindia.in/article/prevention-torture-bill-forgotten-law>
- [32] <https://www.livelaw.in/law-firms/law-firm-articles-custodial-violence-rule-of-law-indian-evidence-act-national-human-rights-commission-184197>
- [33] <http://164.100.47.4/billstexts/rsbilltexts/AsIntroduced/torture-E-151217.pdf>
- [34] <https://nhrc.nic.in/>
- [35] <http://164.100.47.4/billstexts/rsbilltexts/AsIntroduced/torture-E-151217.pdf>
- [36] <https://lawcommissionofindia.nic.in/101-169/Report152.pdf>
- [37] https://jorhatjudiciary.gov.in/study_materials/Custodial%20Violence%20and%20the%20Role%20of%20Magistrates.pdf
- [38] <https://www.sconline.com/blog/post/2017/11/03/273rd-law-commission-report-implementation-un-convention-torture-cruel-inhuman-degrading-treatment-punishment-legislation/>