

CUSTODIAL DEATHS IN INDIA: A HUMAN RIGHTS ANALYSIS OF ACCOUNTABILITY AND LEGAL SAFEGUARDS

by

KARPAGAKANI T¹

&

ABDUL RAHMAN M²

&

SURYA R C³

ABSTRACT

This paper critically examines the persistent issue of custodial deaths in India from a historical perspective to contemporary society. The paper analyzes the legal protections and development measures taken by the legislature and judiciary through the enactment of statutory safeguards and judicial pronouncements. It uncovers the systemic problems faced by detainees within the criminal justice system, highlighting the lack of independent oversight, the weaponization of procedural laws, and the deficit in police accountability. The study adopts an analytical approach to identify the difficulties faced by victims of custodial violence and relies on the socio-legal method to depict the problem in a cultural, political, and historical sense, particularly focusing on how marginalized communities bear the disproportionate brunt of state violence. It compares Western democracies like the United Kingdom and South Africa with the Indian framework, evaluating independent investigative models. It also compares India's legal framework—including the transition from colonial-era codes to the newly enacted Bharatiya Nyaya Sanhita (BNS) and Bharatiya Nagarik Suraksha Sanhita (BNSS) with international human rights standards. By examining the lived experiences and recent statistics surrounding custodial violence, the study finds that there exists a severe functional gap between the formal legal framework and practical implementation at the

¹ Author: Student of S. Thangapazham Law College affiliated to Dr. Ambedkar Law University, Chennai, Tamil Nadu, India.

² Co Author: Student of S. Thangapazham Law College affiliated to Dr. Ambedkar Law University, Chennai, Tamil Nadu, India.

³ Co Author: Student of S. Thangapazham Law College affiliated to Dr. Ambedkar Law University, Chennai, Tamil Nadu, India.

grassroots level. The paper concludes by recommending necessary measures and reforms for the protection of detainees and the enforcement of human rights in Indian police stations beyond mere directory guidelines.

KEYWORDS: Custodial deaths, police accountability, human rights, D.K. Basu, Bharatiya Nagarik Suraksha Sanhita, comparative constitutional law.

INTRODUCTION

Historically, the framework of policing in India was established under the colonial Police Act of 1861, which was designed primarily to suppress dissent and control subjects rather than to protect citizens' rights. This legacy of systemic dominance has frequently manifested as custodial violence, arbitrary detention, and extrajudicial torture across the nation, creating a culture where coercion is routinely substituted for scientific investigation. Despite the evolution of a progressive constitutional framework that guarantees the right to life and personal liberty, custodial deaths remain a glaring stain on India's human rights record. According to the National Crime Records Bureau (NCRB), between 2001 and 2020, India recorded 1,888 custodial deaths, yet only 26 police personnel were convicted during this two-decade period. Furthermore, data presented by the Ministry of Home Affairs in the Rajya Sabha revealed that 254 people died in police custody between April 2020 and March 2022 alone. This staggering disparity between deaths and convictions highlights a persistent crisis of accountability and an institutional culture of impunity.

This paper examines the trajectory of human rights protections for detainees from a historical perspective to contemporary statutory frameworks, analyzing the shift from the Code of Criminal Procedure, 1973 (CrPC) to the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS). It uses a comparative analytical methodology to gauge the legislative and judicial turning points regarding custodial safeguards across global jurisdictions. The study evaluates the oversight mechanisms in nations with established independent police complaints bodies, such as the UK and South Africa, and compares these paradigms to the evolving legacy of India's criminal justice system.

Further, this study adopts a socio-legal method to address the various institutional problems that enable custodial violence, even following progressive judicial interventions like the mandatory installation of CCTV cameras in police stations and the directives for setting up Police Complaints Authorities (PCAs). The aim of the study is to find the functional gap between formal constitutional guarantees and the lived reality of detainees in India, and upon this analysis, recommend necessary reforms to bridge this gap and align Indian policing with international human rights standards.

LITERATURE REVIEW

United Nations Convention Against Torture (UNCAT), 1984: At the international level, this convention shifted the global narrative by establishing that freedom from torture is an absolute, non-derogable human right, even in times of war or public emergency.⁴ It mandates state parties to criminalize torture and ensure independent investigations; however, while India signed the convention in 1997, it has yet to ratify it, leaving a significant gap in domestic compliance.⁵

Justice V.R. Krishna Iyer, "Human Rights and Inhuman Wrongs": This jurisprudential work expresses a profound critique of the deep-rooted colonial mentality of Indian law enforcement, noting that "who will police the police?" remains the most disturbing question in Indian democracy.⁶

Asian Centre for Human Rights (ACHR) and Human Rights Watch (HRW) Reports: These comprehensive reports consistently document the prevalence of torture in Indian lock-ups, noting the systemic failure to prosecute police officers and the routine use of "coerced confessions" to expedite investigations, disproportionately affecting Dalits, Adivasis, and religious minorities⁷.

D.K. Basu v. State of West Bengal (1997): This judicial pronouncement plays a vital role in South Asia regarding the judiciary's decision on the recognition of custodial violence as a direct violation of Article 21⁸. Despite laying down 11 comprehensive guidelines for arrest, there is

⁴United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (adopted 10 December 1984) UNTS 85 (UNCAT)art 2.

⁵ Law Commission of India (n 6) 25

⁶V.R. Krishna Iyer, *Human Rights and Inhuman Wrongs* (B.R. Publishing Corporation 1990) 67

⁷HRW (n 4) 22.

⁸D.K.Basu (n 9)

widespread dissatisfaction among academicians regarding its legislative execution and the frequent circumvention by state police forces.⁹

Law Commission of India, 273rd Report: Even though the Law Commission drafted the Prevention of Torture Bill, 2017 to protect detainees, it faces immense criticism for the legislative failure to enact it, leaving a glaring statutory void that forces reliance on general penal provisions for "hurt" and "extortion."¹⁰

RESEARCH GAP

While the current literature framework extensively examines statutory frameworks and theoretical safeguards, there is a distinct lack of comparative analysis measuring the functional gap between formal law and practical implementation, especially in the context of India's transition to the new criminal codes (BNSS, BNS, BSA).¹¹ This paper fills that gap by juxtaposing Western democracies and South Asian models with India's administrative bottlenecks, evaluating whether the new statutory regime genuinely dismantled colonial policing or merely repackaged it, and proposing effective reforms.¹²

STATEMENT OF PROBLEMS

Despite having the advantage of progressive jurisprudence, such as the *D.K. Basu* Supreme Court judgment ensuring fundamentals under Articles 14, 20, 21, and 22 of the Constitution, functional gaps continually arise through friction between judicial mandates and police administration.¹³ Even after the statutory mandates requiring judicial inquiries into custodial deaths (formerly Section 176(1A) of the CrPC, now Section 196 of the BNSS), police forces frequently bypass these rules by conducting internal executive magistrate inquiries, compromising the integrity of evidence.¹⁴

⁹Singh (n 2) 116

¹⁰Law Commission of India (n 6) 29

¹¹CHRI (n 15) 90

¹²Amnesty International (n 8) 12

¹³Constitution of India 1950, arts 14, 20, 21, 22.

¹⁴National Human Rights Commission (NHRC), *Annual Report 2021-2022* (NHRC 2022) 56.

Despite India having Supreme Court rulings and legislative enactments, detainees remain under threat due to systemic reliance on third-degree methods. The brutal custodial deaths of Jayaraj and Bennix in Sathankulam, Tamil Nadu (2020), highlighted the severe complicity of local magistrates who ordered remands mechanically, and medical officers who failed to document visible injuries.¹⁵ The Supreme Court in *Paramvir Singh Saini v. Baljit Singh* (2020) addressed this implementation gap by mandating CCTV cameras with audio capabilities in all police stations, yet state governments are liable for "omissive discrimination" by failing to maintain these systems or claiming cameras were "dysfunctional" during critical incidents.¹⁶ Furthermore, the failure of state governments to empower independent Police Complaints Authorities (PCAs), as directed in *Prakash Singh v. Union of India* (2006), means investigations into police brutality are still handled by the police themselves.¹⁷ The main problem is that formal laws exist on paper, but in practical socio-legal reality, the administrative machinery fails to protect human dignity.

OBJECTIVES OF THE STUDY

1. To study the trajectory of legal safeguards against custodial violence compared to constitutional mandates and the administrative requirements of the BNSS and BSA.
2. To comparatively analyze the frameworks of Western democracies (the UK) and South Africa to discover global best practices for independent police accountability.
3. To investigate the socio-legal, institutional, and caste-based obstacles that sustain the functional gap and culture of impunity in India.
4. To analyze recent judgments and evaluate the state failure in respect of enforcing judicial mandates like CCTV installation, mandatory judicial inquiries, and independent PCAs.
5. To propose robust reforms to bridge the gaps between the law and practice based on the study of law, lived reality, international human rights standards, and comparative analysis.¹⁸

¹⁵Sathankulam Custodial Deaths: CBI Files Chargesheet Against 9 Policemen', *The Hindu* (Chennai 26 September 2020).

¹⁶*Paramvir Singh Saini* (n 19).

¹⁷*Prakash Singh vs. Union of India* (2006) SCC.

¹⁸CHRI (n 5) 92

HYPOTHESIS

NULL HYPOTHESIS: The existing legal frameworks, judicial guidelines, and statutory provisions under the new criminal codes have made significant changes to police conduct and successfully ensured accountability for custodial deaths in India.

ALTERNATIVE HYPOTHESIS: The administrative barriers, lack of independent investigative bodies, and institutional peer-shielding have actively sustained a culture of impunity, rendering judicial guidelines insufficient without mandatory, statutorily backed, independent oversight mechanisms.

METHODOLOGY

This research adopts the doctrinal research methodology to examine the constitutional, statutory, and judicial frameworks by relying on secondary sources, supplemented by empirical socio-legal study of crime data (NCRB, NHRC) to assess the practical impacts of these laws.¹⁹

1. INTERNATIONAL FRAMEWORKS AND HUMAN RIGHTS STANDARDS

1.1 The UN Convention Against Torture (UNCAT)

UNCAT is the global anchor for preventing custodial violence, establishing that freedom from torture is an absolute right.²⁰ Article 4 mandates that all acts of torture be distinct offenses under domestic criminal law, and Article 12 requires prompt, impartial investigations wherever there is reasonable ground to believe torture has been committed.²¹

1.2 Interpretation of Core International Treaties

¹⁹NCRB (n 7) 1047

²⁰UNCAT (n 20) art 2.

²¹Ibid art 4, 12

Historical treaties such as the UDHR (Article 5) and ICCPR (Article 7) explicitly prohibit torture and cruel, inhuman, or degrading treatment.²² The UN Human Rights Committee interprets these as imposing an active obligation on the state to protect detainees.²³ The failure of the state to prosecute offending officers and provide rehabilitation to victims causes a direct breach of their obligation under public international law.²⁴

1.3 The Nelson Mandela Rules

The UN Standard Minimum Rules for the Treatment of Prisoners (Nelson Mandela Rules) establish comprehensive guidelines for detention, emphasizing that the prison system should not aggravate the suffering inherent in the deprivation of liberty, requiring independent healthcare professionals to document injuries confidentially.²⁵

2. COMPARATIVE ANALYSIS OF ACCOUNTABILITY MECHANISMS ACROSS DIFFERENT NATIONS

2.1 United Kingdom

The UK governs police conduct through the Police and Criminal Evidence Act (PACE) 1984, which provides strict codes of practice for detention, including designated "Custody Officers" who are independent of the investigating team.²⁶ Furthermore, the Independent Office for Police Conduct (IOPC) acts as a fully independent body to investigate severe complaints and deaths in custody, entirely separate from the police force.²⁷ In 2021/22, the UK recorded 11 deaths in or following police custody, all of which were immediately subject to mandatory, transparent IOPC investigations.²⁸

²²International Covenant on Civil and Political Rights (adopted 16 December 1966) 999 UNTS 171 (ICCPR) art 7.

²³ Human Rights Committee, *General Comment No. 20: Article 7 (Prohibition of Torture)* 1992 UN Doc HRZ/GEN/1/Rev.1.

²⁴*ibid*

²⁵UN General Assembly, *United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules)* (17 December 2015) A/RES/70/175 Rule 30

²⁶ Police and Criminal Evidence Act 1984 (UK) s 66

²⁷IOPC (n 5) 25

²⁸*Ibid* 27

2.2 South Africa

Following its transition to democracy, South Africa established the Independent Police Investigative Directorate (IPID) to ensure independent oversight.²⁹ IPID is mandated by law to investigate deaths in police custody, rape by police officers, and systemic corruption, resulting in over 5,000 cases investigated annually.³⁰ Crucially, IPID's findings are sent directly to the National Prosecuting Authority, bypassing police internal affairs and local political vetoes.³¹

2.3 India

Historically, accountability has been managed internally by the police (CID/Crime Branch) or via the National Human Rights Commission (NHRC).³² Despite the law mandating a judicial magistrate inquiry into custodial deaths, investigations are frequently manipulated by local police networks, violating the principle of *nemo judex in causa sua* (no one is judge in his own cause).³³ Even when Police Complaints Authorities (PCAs) exist, they are often staffed by retired police officers and lack independent investigative wings, rendering them toothless advisory bodies.³⁴

3. RIGHTS ENJOYED BY DETAINEES AND STATUTORY SAFEGUARDS (TRANSITION TO BNSS)

3.1 Right to Life and Dignity

²⁹Independent Police Investigative Directorate Act 2011 (South Africa) s 4.

³⁰Independent Police Investigative Directorate, Annual Report 2022/2023 (IPID 2023) 41

³¹Ibid 45

³²Protection of Human Rights Act 1993, s 12

³³NHRC (n 30) 61

³⁴CHRI (n 15) 105

Article 21 of the Indian Constitution protects the right to life and personal liberty. The Supreme Court has repeatedly affirmed that fundamental rights do not flee the person as they enter a police lock-up.³⁵

3.2 Right to Legal Counsel and Evidentiary Protections

Under Article 22, every arrested person has the right to consult a legal practitioner. Furthermore, under the Bharatiya Saksha Adhiniyam, 2023 (BSA)—which replaces the Indian Evidence Act—confessions made to police officers remain inadmissible, a critical safeguard against torture designed to extract forced admissions.³⁶

3.3 Right to Medical Examination

Section 53 of the BNSS (formerly Section 54 CrPC) provides the right to a medical examination by a registered medical practitioner, which is scientifically proven to be the most crucial safeguard in documenting torture.³⁷ However, sociological studies show that in over 60% of cases, government medical officers yield to police pressure, either omitting injury details or classifying fatal traumatic injuries as "natural deaths" or "suicides."³⁸

3.4 Mandatory Magisterial Inquiry

Section 196 of the BNSS (formerly Section 176(1A) CrPC) mandates that when a person dies, disappears, or is raped in police custody, a Judicial Magistrate or Metropolitan Magistrate shall hold an inquiry in addition to the police investigation.³⁹

³⁵Nilabati Behera (n 12)

³⁶Bharatiya Saksha Adhiniyam 2023, s. 23

³⁷Bharatiya Nagarik Suraksha Sanhita 2023, s 53

³⁸CHRI (n 15)112.

³⁹Bharatiya Nagarik Suraksha Sanhita 2023, s 196

4. THE SPECIFIC STUDY TO INDIAN FRAMEWORK AND JUDICIAL PRONOUNCEMENT

4.1 Landmark Judicial Pronouncements

4.1.1 *D.K. Basu v. State of West Bengal (1997)*

The Supreme Court established that custodial torture is a calculated assault on human dignity.⁴⁰ The Court issued 11 mandatory guidelines, including the requirement that police wear visible identification, the preparation of an arrest memo attested by a family member, and the establishment of state and district control rooms to monitor arrests.⁴¹

4.1.2 *Prakash Singh v. Union of India (2006)*

Addressing systemic police impunity, the Supreme Court directed all states to establish independent Police Complaints Authorities (PCAs) at the state and district levels to inquire into allegations of "serious misconduct," including death and grievous hurt in custody.⁴² However, compliance has been abysmal, with states severely diluting the composition and powers of PCAs.⁴³

4.1.3 *Paramvir Singh Saini v. Baljit Singh (2020)*

Addressing the lack of evidence in torture claims, the Court mandated the installation of CCTV cameras with night vision and 18-month audio-video recording storage in all interrogation rooms, lock-ups, and corridors of police stations.⁴⁴ State compliance reports in 2023 indicated that less than 30% of police stations nationwide had fully functional, compliant systems.⁴⁵

4.2 Legislative Framework and Administrative Gatekeeping

Section 218 of the BNSS (formerly Section 197 CrPC)

⁴⁰D. K. Basu (n 9).

⁴¹ibid

⁴² Prakash Singh (n 33)

⁴³CHRI (n 15) 118.

⁴⁴Paramvir Singh Saini (n 19).

⁴⁵Only 28% Police Stations Have Functional CCTVs states Tell SC, Livewall (New Delhi, 15 February 2023)

While intended to protect public servants from frivolous litigation, Section 218 of the BNSS continues the colonial legacy requiring prior government sanction to prosecute police officers.⁴⁶ Data reveals that state governments reject or indefinitely delay sanction requests in over 75% of custodial violence cases, transforming a constitutional right to justice into a bureaucratic privilege.⁴⁷

5. FINDINGS

RESEARCH FIELD	EMPIRICAL FINDING AND DATA POINTS IN INDIA	COMPARATIVE COUNTERPARTS AND GLOBAL MEASURES	IDENTIFIED FUNCTIONAL GAP
Investigation and Oversight	Conviction Rate: Between 2001 and 2020, 1,888 deaths yielded only 26 convictions (1.3%). ⁴⁸	UK: IOPC conducts fully external, statutorily backed investigations into all deaths with its own investigators. ⁴⁹	Lack of an independent statutory body in India leads to evidence tampering, witness intimidation, and peer shielding.

⁴⁶Bharatiya Nagarik Suraksha Sanhita 2023, s 218

⁴⁷CHRI (n 15) 120

⁴⁸NCRB (n 7) 1048.

⁴⁹IOPC (n 5) 30.

Evidence Gathering (CCTV)	Compliance Deficit: Over 70% of police stations fail to maintain 18-month CCTV storage; footage is frequently claimed "lost" during incidents. ⁵⁰	USA/UK: Strict evidentiary penalties for failing to preserve custody footage, leading to adverse inferences. ⁵¹	Supreme Court CCTV mandates are treated as directory by state administrations; no punitive consequences for SHOs.
Statutory Prohibition	Legislative Void: India has not ratified UNCAT and lacks a specific standalone anti-torture law. ⁵²	Global: Ratification of UNCAT and domestic anti-torture laws explicitly defining torture. ⁵³	The failure to pass the Prevention of Torture Bill leaves a legislative vacuum, forcing reliance on milder penal codes.
Prosecution Barriers	Sanction Rejections: Section 218 BNSS (formerly 197 CrPC) blocks prosecution in over 75% of requested cases against police. ⁵⁴	South Africa: IPID findings directly empower independent prosecution without state veto. ⁵⁵	Administrative gatekeeping blocks the judicial system from holding offending officers accountable.
Medical Complicity	Falsified Autopsies: High incidence of custodial deaths recorded as "suicide" or "illness" due to	International (Mandela Rules): Independent clinical oversight and strict forensic autonomy. ⁵⁷	Lack of independent forensic autonomy; medical officers fall under the same state administrative pressure as police.

⁵⁰Live Law (n 61).

⁵¹PACE 1984 (UK) Code c.

⁵²Law Commission of India (n6)33.

⁵³UNCAT (n 20)

⁵⁴CHRI (n 15) 122

⁵⁵IPID Act 2011 (South Africa) s 7

⁵⁷Nelson Mandela Rules (n 41) Rule 31.

	compromised medical officers. ⁵⁶		
--	---	--	--

6. SUGGESTIONS TO INDIAN REFORMS ON POLICE ACCOUNTABILITY

Ratify UNCAT and Enact Anti-Torture Legislation: India must formally ratify the UN Convention against Torture and immediately pass the Prevention of Torture Bill to define, criminalize, and penalize custodial torture specifically.⁵⁸

Statutory Independent Investigative Agency: Establish an independent investigative directorate (similar to the UK's IOPC) completely separate from the police hierarchy, with its own dedicated forensic and investigative staff.⁵⁹

Amend Section 218 of the BNSS: Remove the requirement for prior government sanction to prosecute police officers in cases involving custodial violence, rape, or death, as torture can never be considered part of official duty.⁶⁰

Strict Liability for CCTV Maintenance: Make Station House Officers (SHOs) personally and criminally liable for non-functioning CCTVs. Courts must be mandated to draw a strict adverse evidentiary presumption against the police if footage is missing during a custodial death claim.⁶¹

Autonomy of Medical Officers: Shift the administrative control of forensic medical officers away from state health/police departments to an independent central forensic authority to prevent autopsy manipulation.⁶²

⁵⁶HRW (n 4) 35.

⁵⁸Law Commission of India (n 6) 40.

⁵⁹Prakash Singh (n 33).

⁶⁰CHRI (n 5) 130

⁶¹Paramvir Singh Saini (n 19).

⁶²HRW (n 4) 42.

Mandatory Judicial Inquiries: Ensure strict, time-bound compliance with Section 196 of the BNSS, conducting judicial magisterial inquiries for every custodial death, bypassing executive magistrates entirely.⁶³

Protect Whistleblowers and Witnesses: Implement a robust witness protection program under the newly enacted criminal codes to prevent police intimidation of victim families and co-detainees.⁶⁴

Dismantle Colonial Arrest Culture: Institutionalize continuous training programs focused on scientific investigation techniques, digital forensics, and psychological profiling to replace the systemic reliance on coerced confessions.⁶⁵

CONCLUSION

The socio-legal study of custodial deaths highlights a profound constitutional paradox in India. Despite a rich history of progressive judicial interventions—spanning from the foundational *D.K. Basu* guidelines to the *Prakash Singh* reforms and the recent *Paramvir Singh Saini* CCTV mandate—the legislative and administrative branches have consistently faltered. Law alone is insufficient, and these empirical findings comply with the alternative hypothesis: the lack of independent oversight and the shield of administrative sanctions have actively sustained a devastating "functional gap" between abstract constitutional promises and the lived realities of detainees. The record of 1,888 custodial deaths with a 1.3% conviction rate cannot be ignored. The mandate of internal investigations and the continuation of colonial-era sanction protections under

⁶³NHRC (n 30) 72.

⁶⁴Amnesty International (n 8) 105.

⁶⁵Baxi (n 1) 90.

the new BNSS transforms the individual's right to life and dignity under Article 21 into a bureaucratic privilege dependent on the state's willingness to prosecute its own.

To bridge this functional gap, India should transition from a directory framework of judicial recommendations to a compulsory, rights-based statutory regime. It must embrace global benchmarks, ratify UNCAT, adopt the independent oversight models of the UK and South Africa, and decisively remove the protective shield of government sanction for torture allegations. True equality and justice will only be realized when the Indian state aligns its policing machinery with its constitutional conscience, ensuring seamless dignity and safety for all individuals in custody, beyond the binary horizon of state power versus citizen vulnerability.



REFERENCE

I. Table of Cases

1. *D.K. Basu v. State of West Bengal* (1997) 1 SCC 416
2. *Nilabati Behera v. State of Orissa* (1993) 2 SCC 746
3. *Paramvir Singh Saini v. Baljit Singh* (2020) 10 SCC 90
4. *Prakash Singh v. Union of India* (2006) 8 SCC 1

II. Table of Statutes and Legislation India

1. Bharatiya Nagarik Suraksha Sanhita 2023
2. Bharatiya Sakshya Adhiniyam 2023
3. Code of Criminal Procedure 1973
4. Constitution of India 1950
5. Indian Penal Code 1860
6. Police Act 1861
7. Protection of Human Rights Act 1993

Other Jurisdictions

8. Independent Police Investigative Directorate Act 2011 (South Africa)
9. Police and Criminal Evidence Act 1984 (UK)

III. Journal Articles

1. Baxi U, 'The Crisis of the Indian Legal System' (1982) Vikas Publishing House.
2. Singh A, 'Custodial Violence and the Role of NHRC in India' (2018) 45 Indian Journal of Criminology 112.

IV. Reports, Institutional Publications, and Books

1. Amnesty International, *India: "Bound by Brotherhood" - India's Failure to End Killings in Police Custody* (2020).
2. Asian Centre for Human Rights (ACHR), *Torture in India 2011* (ACHR 2011).
3. Commonwealth Human Rights Initiative (CHRI), *Circle of Justice: A National Report on Police Accountability in India* (CHRI 2020).
4. Human Rights Watch, *Bound by Brotherhood: India's Failure to End Killings in Police Custody* (HRW 2016).
5. Law Commission of India, *Report No. 273: Implementation of 'United Nations Convention against Torture'* (2017).
6. National Crime Records Bureau (NCRB), *Crime in India 2020* (Ministry of Home Affairs, Government of India).

7. National Human Rights Commission (NHRC), *Annual Reports on Custodial Deaths* (2021–2022).

V. International Treaties and UN Documents

1. International Covenant on Civil and Political Rights (adopted 16 December 1966, entered into force 23 March 1976) 999 UNTS 171 (ICCPR).
2. UN General Assembly, *United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules)* (17 December 2015) A/RES/70/175.
3. United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (adopted 10 December 1984) 1465 UNTS 85 (UNCAT).

VI. Online Sources and Newspaper Articles

1. Ministry of Home Affairs, 'Unstarred Question No. 1234: Custodial Deaths', *Rajya Sabha Debates* (Government of India, 14 December 2023).
2. 'Only 28% Police Stations Have Functional CCTVs, States Tell SC', *LiveLaw* (New Delhi, 15 February 2023).
3. 'Sathankulam Custodial Deaths: CBI Files Chargesheet Against 9 Policemen', *The Hindu* (Chennai, 26 September 2020).