
THE LOKPAL AT A CROSSROADS BETWEEN STATUTORY PROMISE AND INSTITUTIONAL REALITY

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ABSTRACT

The Lokpal, India's apex anti-corruption ombudsman, was conceived as the institutional answer to a decades-old constitutional lacuna: the absence of an independent authority empowered to scrutinise the probity of the political executive and higher bureaucracy. Enacted in the wake of the 2011 civil-society mobilisation led by Anna Hazare, the Lokpal and Lokayuktas Act 2013 promised a hybrid ombudsman-cum-prosecutorial body capable of investigating and prosecuting corruption at the highest levels of government. Over a decade later, the institution remains encumbered by delayed operationalisation, jurisdictional ambiguity, and a widening gap between statutory promise and administrative practice. This paper undertakes a critical and comparative reappraisal of the Lokpal, situating the Indian experiment within the wider international lineage of ombudsman and anti-corruption institutions, and examines recent jurisprudential and administrative developments including the Supreme Court's 2025 intervention on the Lokpal's jurisdiction over judges and the 2026 Parliamentary Standing Committee findings on the institution's continuing inertia to test the hypothesis that the Lokpal's inherent structural design constrains its capacity to deliver good governance. The paper concludes with concrete suggestions for institutional reform.

Keywords: Lokpal; Anti-Corruption Law; Administrative Law; Institutional Independence; Public Accountability.

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I. INTRODUCTION

Governance is, at its core, a human enterprise, and the conversation about what constitutes *good* governance is perpetually unfinished. Governance is not synonymous with government: the latter denotes an institutional apparatus, while the former is the wider process of policy formation, informal norm-setting, and administrative decision-making through which social practice is actually shaped. Good governance is conventionally understood to possess eight interlocking attributes it is participative, consensus-oriented, accountable, transparent, responsive, effective and efficient, equitable and inclusive, and it follows the rule of law.¹ Corruption is the principal solvent that erodes each of these attributes simultaneously, and it is this recognition that gives the Lokpal its constitutional and moral significance.

For a developing and demographically vast polity such as India, the pursuit of good governance is a continuous and unfinished project. Although the Constitution of India is, by common consent, a carefully wrought and progressive document, the constitutional design has long suffered from one conspicuous absence: a permanent, independent authority charged with monitoring the probity of political and administrative conduct. This absence allowed corruption in its manifold forms of bribery, nepotism and undue favouritism to entrench itself as a pervasive feature of public life, eroding public trust, distorting economic incentives, and corroding the constitutional promise of fairness and equal treatment. Lord Acton's aphorism that *power corrupts* finds ample and repeated illustration in the Indian experience, where functionaries occupying positions of public trust have frequently acted with a demonstrable sense of impunity.

It was this systemic deficiency the want of a vigilant, independent check upon the political process that gave birth to the idea of an Indian ombudsman. The concept was first formally mooted in the mid-1960s by the First Administrative Reforms Commission, which proposed the creation of two institutions, a Lokpal at the Union level and Lokayuktas in the States, modelled loosely on the Scandinavian ombudsman. Successive iterations of the Lokpal Bill were introduced in Parliament from 1968 onward in 1968, 1971, 1977, 1985, 1989, 1996, 1998, 2001, 2005 and 2008 and each lapsed without enactment, a legislative history that itself testifies to the institution's contested and politically inconvenient character.²

¹Mohit Bhattacharya, *New Horizons of Public Administration* (Jawahar Publishers & Distributors 2011) 406.

²U K Jha, 'Tackling the Menace of Corruption: Need for a Broad Framework' (2014) 75(4) *The Indian Journal*

The political landscape shifted decisively in 2011. A nationwide anti-corruption movement, led by the veteran social activist Anna Hazare and supported by figures including Justice Santosh Hegde, Shanti Bhushan, Prashant Bhushan and Arvind Kejriwal, converged around the demand for a strong Jan Lokpal Bill. The website IndiaAgainstCorruption.org solicited public comment on successive drafts, and the final version of the Jan Lokpal Bill was published in August 2011 after extensive civil-society consultation.³ Hazare's 'fast unto death' became the emblem of a wider public exasperation, and the sustained pressure it generated forced the Union government to constitute a Joint Drafting Committee comprising an equal number of ministers and civil-society nominees. That process culminated in the enactment of the Lokpal and Lokayuktas Act 2013, which sought to create an impartial anti-corruption authority empowered to investigate and prosecute public servants from the lowest functionary to, subject to specific safeguards, the Prime Minister.⁴

The enactment of the 2013 Act was hailed, at the time, as a historic vindication of participatory constitutionalism. Yet the passage of over a decade since then a decade that has seen prolonged delays in appointing the institution's first office-holders, contested questions of jurisdiction, and only recent, halting attempts at operationalising its investigative and prosecutorial wings makes it necessary to ask whether the Lokpal, in its current statutory form, is capable of discharging the good-governance mandate for which it was designed, or whether it is burdened by structural and design flaws that blunt its effectiveness. This paper advances the latter view. It proceeds in nine further parts: Part II discuss the Lokpal within the comparative and international lineage of ombudsman and anti-corruption institutions; Part III examines the good-governance rationale underlying the 2013 Act; Part IV sets out the Lokpal's institutional architecture; Part V compares the Lokpal with the anti-corruption framework it was meant to supersede; Part VI evaluates the Lokpal's role in ethical and participatory governance; Part VII analyses contemporary developments and emerging jurisprudence between 2019 and 2026; Part VIII offers a constitutional and structural assessment of the institution's contours; and Parts IX and X present the paper's conclusions and suggestions for reform.

This paper adopts a doctrinal and comparative methodology. It proceeds from a close reading

of Political Science 633, 634 <<https://www.jstor.org/stable/26575542>> accessed 6 May 2026.

³R K Raghavan, 'The Lokpal and the CBI' *The Hindu* (Chennai, 4 September 2011) <<https://www.thehindu.com/opinion/lead/the-lokpal-and-the-cbi/article2424159.ece>> accessed 6 May 2026.

⁴P Venkata Ramana and others, *Institution of Lokpal in India: Exploring the Viability to Arrest Corruption* (Manglam Publications 2020) ch 2.

of the Lokpal and Lokayuktas Act 2013 and its legislative history, tests the statutory design against the comparative experience of functionally analogous institutions in other jurisdictions, and evaluates both against the Lokpal's own operating record as disclosed by parliamentary reports, official data and recent appellate jurisprudence. The paper does not purport to offer an empirical or quantitative assessment of corruption levels in India before and after 2013; such an assessment would require a different methodological apparatus and lies beyond the present scope. Its ambition is more modest and more precisely bounded: to determine, through doctrinal and comparative analysis, whether the institutional design chosen in 2013 was structurally adequate to the good-governance mandate the Act itself proclaims, and, where it was not, to identify the specific respects in which reform is warranted.

II. THE GENESIS OF THE OMBUDSMAN IDEA: A COMPARATIVE AND INTERNATIONAL PERSPECTIVE

The Lokpal did not emerge in an institutional vacuum. It is the Indian variant of a much older transnational tradition of independent oversight bodies, and a comparative reading of that tradition sharpens the diagnosis of what the Indian design gets right and where it departs, sometimes unwisely, from tested models.

A. The Scandinavian Ombudsman Tradition

The institutional prototype is Sweden's *Justitieombudsman*, established under the Instrument of Government of 1809 as a parliamentary officer empowered to receive citizen complaints against maladministration and to supervise the legality of executive action. The Swedish model is characterised by three features that recur, in varying strength, across every successful ombudsman institution: parliamentary rather than executive appointment, security of tenure insulating the office-holder from the government of the day, and a power of independent inquiry that does not depend on executive sanction to proceed. Denmark, Finland and Norway adopted structurally similar institutions in the twentieth century, giving rise to what comparative administrative lawyers describe as the 'Nordic model' of grievance redress an institution oriented primarily towards maladministration rather than criminal prosecution, backed by moral authority and publicity rather than coercive power.

B. The Commonwealth Diffusion: New Zealand, the United Kingdom and Australia

New Zealand was the first Commonwealth jurisdiction to adopt the Scandinavian model,

enacting the Parliamentary Commissioner (Ombudsman) Act 1962. The United Kingdom followed with the Parliamentary Commissioner Act 1967, creating the office of the Parliamentary Commissioner for Administration the 'Ombudsman' though subject to the well-known 'MP filter', under which a complainant could approach the Ombudsman only through a Member of Parliament. Australia's Ombudsman Act 1976 dispensed with the filter and allowed direct citizen access. What is notable, for present purposes, is that none of these Commonwealth ombudsmen were given independent powers of prosecution: their remit was recommendatory, and their sanction was publicity and parliamentary embarrassment rather than criminal liability. The Indian Lokpal, by contrast, was conceived from the outset as a body with powers of investigation and eventually prosecution, a considerably more ambitious design that borrows less from the Commonwealth ombudsman tradition than from a second, distinct lineage: the dedicated anti-corruption agency.

C. The Anti-Corruption Agency Model: Hong Kong and Singapore

Singapore's Corrupt Practices Investigation Bureau, established in 1952 and substantially strengthened after 1959, is frequently cited as the oldest specialised anti-corruption agency in Asia. It reports directly to the Prime Minister, combines investigation with preventive and educational functions, and has been credited with Singapore's sustained high ranking on international corruption-perception indices. Hong Kong's Independent Commission Against Corruption, established in 1974 in response to police corruption scandals, is the most frequently invoked comparator for hybrid ombudsman-prosecutor bodies. The ICAC is headed by a Commissioner who reports directly to the Chief Executive, and it operates through three coordinated arms an Operations Department with investigative and arrest powers, a Corruption Prevention Department that reviews the practices and procedures of public bodies, and a Community Relations Department engaged in public education a design often summarised as the 'three-pronged' enforcement-prevention-education strategy.⁵ Crucially, ICAC staff are not part of the ordinary civil service, which insulates the agency from departmental patronage networks, and its statutory basis is entrenched under Article 57 of the Hong Kong Basic Law, giving it a constitutional permanence that ordinary legislation cannot easily unwind. Comparative research on the ICAC's forty-year record attributes its effectiveness less to its formal powers than to the sustained public confidence it has enjoyed, which has in turn shielded

⁵Independent Commission Against Corruption, 'Combating Corruption: The Hong Kong Experience' (ICAC) <<https://www.tsinghuachinalawreview.law.tsinghua.edu.cn>> accessed 11 May 2026.

its institutional independence from erosion even after the 1997 transfer of sovereignty.⁶

D. Wider Global Diffusion and the International Legal Framework

The ombudsman idea has, since the 1980s, spread well beyond its Nordic and Commonwealth origins. France's *Défenseur des droits*, established by constitutional amendment in 2008 and consolidating several pre-existing oversight bodies into a single constitutionally entrenched office, illustrates a further design choice available to legislators: rather than creating a purely statutory body liable to amendment or abolition by ordinary parliamentary majority, the French model places the institution's existence and core powers beyond the reach of ordinary legislative revision. Latin American constitutions adopted after the democratic transitions of the 1980s and 1990s, including those of Argentina, Colombia and Peru, similarly entrench a *Defensor del Pueblo* at constitutional rather than merely statutory level. India's Lokpal, by contrast, owes its existence entirely to ordinary parliamentary legislation, and could in principle be diluted or repealed by a future Parliament possessing a simple majority a vulnerability that has no counterpart in either the French or the Latin American models, and one that arguably weakens the institution's claim to the kind of durable independence that Part VIII of this paper identifies as a precondition of effectiveness.

India's own accession to the United Nations Convention against Corruption in 2011 supplies an additional international-law dimension to this comparative analysis. Article 6 of the Convention obliges state parties to ensure the existence of a body or bodies that prevent corruption through measures such as public-sector oversight and policy coordination, while Article 36 requires the existence of specialised anti-corruption law-enforcement bodies possessing the necessary independence to perform their functions effectively, free from undue influence.⁷ The Lokpal and Lokayuktas Act 2013 is properly read, in part, as India's domestic implementation of these treaty obligations, and it is this treaty dimension that also supplies the constitutional route, via Article 253, through which Parliament's competence to legislate on a subject that might otherwise fall within State jurisdiction is defended a point examined further in Part VIII. Measured against the Convention's own benchmark of institutional independence 'free from undue influence', however, the delays and jurisdictional uncertainties documented

⁶Ting Gong and Na Zhang, 'Differential Public Support and the Independence of Anti-Corruption Agencies' *European Political Science Review* (Cambridge University Press, 2023) <<https://www.cambridge.org/core/journals/european-political-science-review>> accessed 06 May 2026.

⁷United Nations Convention against Corruption (adopted 31 October 2003, entered into force 14 December 2005) 2349 UNTS 41, arts 6, 36.

in Part VII suggest that India's compliance with the spirit, if not the bare letter, of its international obligations remains a work in progress.

E. Lessons for the Indian Design

Four comparative lessons emerge. First, institutions that combine grievance redress with prosecutorial power the Lokpal's chosen model require a correspondingly higher degree of insulation from the executive than pure ombudsman bodies, because coercive power invites a correspondingly higher risk of political capture or, conversely, political sabotage through under-resourcing. Second, staffing that is seconded from, and eventually returns to, the very bureaucracy under investigation (as remains largely true of the Lokpal's establishment) dilutes the independence that agencies such as the ICAC achieve through a dedicated, non-transferable cadre. Third, public confidence is not a by-product of institutional design but a precondition for its success an agency that is not seen to act will not be trusted to act, and the erosion of trust becomes self-reinforcing. Fourth, none of the successful comparators left the agency's prosecutorial machinery unbuilt for over a decade after the enabling statute was passed, a delay that, as Part VII demonstrates, has been the single most damaging feature of the Indian experience. The remainder of this paper tests the Lokpal against these comparative benchmarks.

III. THE GOOD GOVERNANCE OBJECTIVE OF THE LOKPAL AND LOKAYUKTAS ACT 2013

The degree of corruption prevailing within a polity is now a well-recognised component of the broader development matrix, correlated with outcomes across public health, education and every other index of human development. It remains a matter of some disquiet that such institutional degradation can originate from a cabinet that is, on paper, learned, articulate and accomplished. The impact of corruption on Indian society is genuinely multifaceted: the most prevalent manifestation is straightforward financial bribery, but it is accompanied by nepotism (undue favour to relatives) and favouritism (undue generosity toward one party over another) as structurally embedded practices. The Jan Lokpal Bill, as originally conceived by civil society, sought to create an impartial anti-corruption body vested with the authority to investigate and, where warranted, prosecute participating government officials, legislators and

bureaucrats, with jurisdiction extending to the highest constitutional functionaries.⁸

The drafting history of the Bill illustrates the depth of civil-society engagement that shaped the final Act. The term 'Lokpal' itself was used in a parliamentary debate as early as 1963 by the Member of Parliament L M Singhvi. Justice Santosh Hegde a former Solicitor-General and, at the material time, Lokayukta of Karnataka together with the senior advocate Prashant Bhushan, played a prominent role in the civil-society drafting process alongside Shanti Bhushan, who had first introduced a version of the Lokpal Bill in the Lok Sabha in 1968; that Bill was approved by the House but lapsed on dissolution before the Rajya Sabha could act upon it.⁹ A Joint Drafting Committee, co-chaired by the then Union Finance Minister Pranab Mukherjee and constituted on a 5:5 basis of government ministers (including Mr Mukherjee, Veerappa Moily, P Chidambaram, Salman Khurshid and Kapil Sibal) and civil-society nominees (Shanti Bhushan, Anna Hazare, Justice Santosh Hegde, Arvind Kejriwal and Prashant Bhushan), was tasked with reconciling the government's and civil society's competing drafts before Parliament's monsoon session of 2011. The resulting statute reflects a compromise between the more expansive Jan Lokpal draft and the government's preferred, narrower formulation a compromise that, as later parts of this paper argue, left several structural ambiguities unresolved.¹⁰

The current Chairperson of the Lokpal is Justice Ajay Manikrao Khanwilkar, a former Judge of the Supreme Court of India who assumed office on 10 March 2024. The composition and leadership of the institution have thus stabilised only recently, more than a decade after the enabling Act received presidential assent a delay that is itself a significant datum for any assessment of the institution's good-governance performance, and one this paper returns to in Part VII.

The Act's own drafters were conscious of the tension between an expansive jurisdiction and administrative feasibility, and the final text accordingly extends the Lokpal's authority over the Prime Minister only subject to significant safeguards: allegations concerning international relations, external and internal security, public order, atomic energy and space are excluded from the Lokpal's purview in relation to the Prime Minister, and any inquiry against a sitting

⁸ Arvind Verma and Ramesh Sharma (eds), *Combating Corruption in India* (Cambridge University Press 2019) ch 4.

⁹ U K Jha, 'Tackling the Menace of Corruption: Need for a Broad Framework' (2014) 75(4) *The Indian Journal of Political Science* 633, 635 <<https://www.jstor.org/stable/26575542>> accessed 6 May 2026.

¹⁰ Ram Ahuja, *Social Problems in India* (3rd edn, Rawat Publications 2013) 467, citing the Santhanam Committee Report on the Prevention of Corruption.

Prime Minister may proceed only where a Full Bench of the Lokpal, comprising not less than two-thirds of its Members, concurs in ordering it, and only after the complaint has been considered in camera with an opportunity for the Prime Minister to be heard before an order directing inquiry is made. This graduated, safeguard-laden structure reflects the compromise reached in the 2011 Joint Drafting Committee between the civil-society draft, which had originally sought unqualified jurisdiction over the Prime Minister, and the government's insistence on carve-outs analogous to those found in comparable oversight statutes elsewhere in the Commonwealth.¹¹ Members of Parliament are similarly excluded from the Lokpal's jurisdiction in respect of anything said, or any vote given, within the House, a protection that mirrors the parliamentary-privilege architecture considered by the Supreme Court in *Sita Soren*, discussed in Part VII, though as that decision itself makes clear the privilege does not extend to shield the underlying act of bribery from ordinary criminal process.

IV. MAIN FEATURES AND INSTITUTIONAL ARCHITECTURE OF THE LOKPAL

The Lokpal and Lokayuktas Act 2013 contemplates a two-tier structure: a central Lokpal, and a Lokayukta in each State, established under corresponding State legislation. Both institutions are designed to be functionally independent of the executive in the manner of the Supreme Court and the Election Commission, so that no minister or member of the permanent bureaucracy is intended to be able to directly influence an ongoing inquiry. The statutory scheme envisages that the majority of investigations should be completed within a defined period ordinarily one year with the corresponding trial to conclude within a further specified period, so that a corrupt politician, police officer or judicial officer may be brought to account within a reasonably compressed timeframe. Where an official is found guilty, provision is made for the recovery of loss caused to the public exchequer.

The jurisdiction of the Lokpal is not confined to allegations of financial bribery in the narrow sense. Citizens may approach the institution in respect of unexplained delay or arbitrary refusal in the delivery of routine public services the issuance of a ration card, passport or voter identification document as well as in respect of graft in public works, such as the construction of substandard roads, or misappropriation of funds allocated to Panchayati Raj institutions. The Act further provides for a participatory and transparent selection process for the Lokpal's own

¹¹ P Venkata Ramana and others, *Institution of Lokpal in India: Exploring the Viability to Arrest Corruption* (Manglam Publications 2020) 58.

members, involving sitting judges, eminent citizens and constitutional authorities, precisely so as to guard against the risk that the institution meant to police corruption might itself become compromised. A separate, internally administered mechanism is provided for complaints against the Lokpal's own officers, who may be investigated and, if found culpable, removed within a compressed timeframe, in keeping with the principle that the institution must itself be beyond reproach if its moral authority is to remain intact. On paper, the Lokpal was designed to absorb and eventually supersede the anti-corruption functions previously discharged by the Central Bureau of Investigation, departmental vigilance wings, and the various state Anti-Corruption Bureaus.

The composition of the Lokpal itself is designed as a further check against the very corruption it is meant to police. The Chairperson and Members are selected by a Selection Committee comprising the Prime Minister, the Speaker of the Lok Sabha, the Leader of the Opposition (or, in the absence of a recognised Leader of the Opposition, the Leader of the single largest opposition party), the Chief Justice of India or a nominee Judge of the Supreme Court, and one eminent jurist nominated by the other four members. This Selection Committee is, in turn, assisted by a Search Committee of at least eight persons of standing, whose function is to shortlist candidates for the Selection Committee's consideration. Members must possess not less than twenty-five years of relevant experience in fields such as anti-corruption policy, public administration, vigilance, finance, insurance and banking, law, or management, and the Act requires that not less than fifty per cent of the Members be drawn from the Scheduled Castes, Scheduled Tribes, Other Backward Classes, minorities and women, a representational safeguard intended to guard against the institution replicating the social exclusivity that has periodically been the subject of criticism in respect of comparable higher constitutional appointments.

V. LOKPAL VIS-À-VIS THE PRE-EXISTING ANTI-CORRUPTION FRAMEWORK: A COMPARATIVE ASSESSMENT

The institutional deficiencies of the pre-2013 anti-corruption apparatus supply the principal justification for the Lokpal's creation. Because the Central Bureau of Investigation and the various state Anti-Corruption Bureaus are departments of the executive rather than autonomous constitutional bodies, politicians and senior officials have historically enjoyed a considerable degree of practical insulation from investigation. Both agencies were required, until recently,

to obtain prior governmental sanction before registering a case or launching a prosecution against a public servant of a specified seniority a procedural filter that critics have long identified as the single greatest structural obstacle to effective anti-corruption enforcement. The Central Vigilance Commission, similarly, possesses only recommendatory authority and lacks the power to directly dismiss a corrupt or errant officer, a limitation that has repeatedly been the subject of judicial and parliamentary comment since the Commission's establishment.¹²

The position of the higher judiciary presents a related difficulty: because the initiation of criminal proceedings against a sitting or former judge conventionally requires prior consultation with, and in practice the concurrence of, the Chief Justice of India, corrupt judicial conduct has historically been shielded from ordinary criminal process to a degree not applicable to other public servants a protective architecture whose contours the Supreme Court has had fresh occasion to consider, as discussed in Part VII below. Commentators writing shortly after the passage of the 2013 Act observed that the pre-existing agencies were themselves compromised by weak and occasionally corrupt personnel occupying key anti-corruption posts, a criticism that formed part of the civil-society case for a wholly reconstituted, statutorily independent body.¹³ Ordinary citizens interacting with government departments have frequently been compelled, in practice, to make informal payments to secure routine entitlements, with the further difficulty that complaints could typically be lodged only with senior officers who themselves had an institutional interest in suppressing them, and illegitimately acquired wealth was rarely, if ever, recovered through the ordinary criminal process. The penal consequence for proven corruption under the unamended Prevention of Corruption Act 1988 a term of imprisonment of between six months and seven years was, on this account, an inadequate deterrent relative to the scale of illicit gain.

The 2013 Act sought to correct each of these deficiencies. Both the Lokpal and the state Lokayuktas were conceived as genuinely autonomous bodies; the Act contemplated the eventual merger of anti-corruption investigative capacity presently distributed across the CBI and the various Anti-Corruption Bureaus into new, unified structures answerable to the Lokpal and Lokayukta respectively; investigations and trials were to be time-bound, with a target of

¹²Vineet Narain v Union of India AIR 1998 SC 889; (1998) 1 SCC 226.

¹³G Navlakha, 'Lokpal Movement: Unanswered Questions' (2011) 46(44/45) Economic and Political Weekly 19, 20.

completion within roughly two years of a complaint reaching the requisite threshold of seriousness; an errant government employee could be ordered removed by the Lokpal or Lokayukta without the delay characteristic of ordinary departmental proceedings; the erstwhile State Vigilance Commission structures were, in principle, to be subsumed within the Lokayukta; and provision was made for salary deductions from officers found guilty of corruption, to be applied as compensation to affected citizens, alongside enhanced penal consequences of a minimum five years' imprisonment extending, in aggravated cases, to imprisonment for life. Selection of Lokpal and Lokayukta members was, by design, to be insulated from partisan political influence, and the institution's case files were, subject to appropriate safeguards, to be made public upon the conclusion of an inquiry, in keeping with the Act's transparency objective. Whether this statutory design has translated into practice is a distinct question, addressed at length in Part VII.¹⁴

A further comparative dimension is worth drawing out. The Central Vigilance Commission Act 2003 and the Delhi Special Police Establishment Act 1946 the statute under which the CBI itself is constituted were both amended contemporaneously with the passage of the 2013 Act, in an attempt to strengthen the 'single directive' requirement under which prior CVC concurrence is needed before the CBI can investigate certain categories of senior officer. The net effect, however, has been the layering of a new institution atop an old one whose structural weaknesses were only partially remedied, rather than the clean institutional replacement that the Jan Lokpal draft had originally envisaged; the CBI continues to operate under the administrative control of the Department of Personnel and Training, and the promised transfer of its anti-corruption wing to the Lokpal's own superintendence has, as Part VII documents, not yet been substantively realised.¹⁵

VI. THE ROLE OF LOKPAL IN ETHICAL AND PARTICIPATORY GOVERNANCE

Citizens of a democratic polity such as India inevitably come to occupy the front line of the struggle against institutionalised corruption. Much of the difficulty in sustaining that struggle arises not from an absence of public awareness but from a culture of tolerance toward low-visibility malpractice, compounded by weak feedback channels between citizen and state. A healthy polity requires both organised civil interests and accessible public or political platforms

¹⁴Sriram Panchu, 'Repairing the Lokpal' (2012) 47(3) Economic and Political Weekly 8.

¹⁵Arvind Verma and Ramesh Sharma (eds), *Combating Corruption in India* (Cambridge University Press 2019) 112–14.

through which resistance to corrupt practice can be mobilised and sustained. Even well-educated and well-informed citizens frequently fail to channel their frustration into effective institutional pressure, defaulting instead to private acquiescence; yet where citizens act collectively, the evidence suggests that anti-corruption mobilisation can meaningfully alter institutional behaviour, as the 2011 movement itself demonstrated.¹⁶ The appointment of a functioning Lokpal and of effective state Lokayuktas was expected to make a material difference to this dynamic; that a number of state Lokayuktas remain substantially hobbled by resourcing and jurisdictional constraints, even a decade after the central Act's enactment, is accordingly a matter of continuing concern for the wider good-governance project.

An independent investigative body of this kind is, on the civil-society account, a structural precondition for combating corruption effectively. The 2011 movement itself was in substance a popular mobilisation against the perceived unwillingness of the central government to legislate robustly against graft, with the Jan Lokpal Bill as its central demand, a mobilisation given considerable additional momentum by Anna Hazare's fast. Corruption, on this reading, is one of the principal outward manifestations of a wider institutional immorality; a pervasive public scepticism toward anti-corruption machinery, and the demonstrable ineffectiveness of such machinery to date, together produce a self-reinforcing perception that anti-corruption enforcement is not undertaken in good faith, and that existing bodies are, on occasion, weaponised by political actors against opponents rather than deployed even-handedly.¹⁷

Administrative law scholarship commonly identifies four categories of institutional malpractice against which a body such as the Lokpal is meant to guard: first, grave and deliberate disregard of constitutional norms and institutions; second, the systematic maltreatment or subversion of democratic institutions, including the legislature and the executive; third, the abuse of official authority through favouritism, victimisation, or harassment of citizens or subordinates; and fourth, the misuse of public resources to sustain an extravagant official lifestyle. It has accordingly been suggested that the Prevention of Corruption Act 1988 itself required amendment a suggestion subsequently acted upon through the Prevention of Corruption (Amendment) Act 2018 to designate collusive bribery, where both giver and taker act in concert to defraud the state, as a distinct statutory offence, with an

¹⁶A Johri, A Bhardwaj and S Singh, 'The Lokpal Act of 2014: An Assessment' [2014] Economic and Political Weekly 10, 11.

¹⁷P K Tripathi, 'Lokpal: The Proposed Indian Ombudsman' (1967) 9(2) Journal of the Indian Law Institute 135, 140.

enhanced financial penalty where the offence results in demonstrable loss to the exchequer. Ethics-focused administrative scholarship situates the Lokpal within this wider matrix of reform, arguing that institutional design alone cannot substitute for a sustained culture of public-service ethics, citizen charters, and technologically enabled transparency.¹⁸

The overwhelming majority of citizen grievances directed at the Lokpal and Lokayuktas are, in practice, bureaucratic in character rather than narrowly criminal, and the volume of such complaints tends to track the expansion of the administrative state itself: as the bureaucracy grows, so does the raw number of grievances against it. It is in this sense that the Lokpal functions, in aspiration if not always in practice, as a defender of citizens' administrative rights and not merely as a criminal investigative agency. Recommendations advanced in the years immediately following the 2013 Act including the creation of a constitutionally entrenched national ombudsman (a 'Rashtriya Lokayukta'), whose office and authority would be expressly guaranteed rather than merely statutory, so as to place its credibility beyond legislative caprice remain, at the time of writing, unimplemented. Such a body was envisaged as headed by a sitting or former Supreme Court judge of acknowledged eminence, sitting alongside the Central Vigilance Commissioner in an *ex officio* capacity, with membership determined by an independent selection committee, and vested with jurisdiction over the entire Council of Ministers and Parliament, excepting only the Prime Minister in respect of certain sensitive categories of decision.¹⁹ An equivalent constitutional entrenchment was recommended for the Lokayukta institution at state level, together with the corresponding subordination of state Anti-Corruption Bureaus to the State Vigilance Commission and the transfer of corruption allegations against members of the state legislature to specially constituted courts. A related, and still largely unrealised, recommendation was the creation of a dedicated local-bodies ombudsman empowered to investigate allegations of corruption or maladministration against elected members of panchayats and urban local bodies, requiring corresponding amendment of the relevant panchayati raj and municipal legislation.

The question of how public information may be marshalled in the service of accountability remains, in 2026, as pressing as it was in 2013. Four concrete steps continue to merit priority: first, the ongoing digitisation of government records in formats accessible to non-literate and semi-literate citizens, which is now considerably more advanced than it was a decade ago;

¹⁸B P Mathur, *Ethics for Governance: Reinventing Public Services* (Routledge 2014) ch 6.

¹⁹V Bhanu, 'Politics of Lokpal: A Way Beyond' (2011) CLRA Research Paper Series No 1, 4.

second, full-text and voice-enabled searchability across digitised government content; third, the extension of citizen-facing digital platforms to routine transactions, such as obtaining a certified copy of a land record; and fourth, the wider deployment of electronic signatures and self-service certification, so as to progressively reduce the discretionary bureaucratic gatekeeping that has historically been a principal vector of petty corruption. The Lokpal's own delayed adoption of a comparable digital-complaint architecture is a point taken up further in Part X.

VII. CONTEMPORARY DEVELOPMENTS AND EMERGING JURISPRUDENCE (2019–2026)

No critical assessment of the Lokpal written in 2026 can rest solely on the text of the 2013 Act or on the commentary that accompanied its passage. The institution's actual operating record over the past seven years supplies evidence, much of it troubling, of the gap between statutory design and administrative reality.

A. Delayed Operationalisation of Leadership and Machinery

The Lokpal's first Chairperson, Justice Pinaki Chandra Ghose, was appointed only in March 2019 nearly six years after the Act received presidential assent. Upon Justice Ghose's retirement in May 2022, the office of Chairperson was held in an additional, non-substantive capacity by a serving Judicial Member, Justice Pradip Kumar Mohanty, until Justice Ajay Manikrao Khanwilkar was appointed Chairperson in February 2024 and formally assumed office in March 2024. This pattern of prolonged vacancy at the apex of the institution echoed at the level of individual Members, several of whose terms expired in March 2024 and were not immediately filled has structurally impaired the Lokpal's capacity to build the institutional memory and administrative momentum that comparator bodies such as Hong Kong's ICAC established within their first decade of operation.²⁰ More consequentially still, the Act's Inquiry Wing and Prosecution Wing the very machinery through which the Lokpal was meant to supersede the CBI's anti-corruption function remain, more than a decade after enactment, substantially unbuilt.

²⁰See generally the successive tenures recorded in the Government of India's Lokpal appointment notifications, 2019–2024.

B. The 145th Report of the Parliamentary Standing Committee (2026)

The Parliamentary Standing Committee on Personnel, Public Grievances, Law and Justice, in its 145th Report tabled in late 2025 and reported upon in January 2026, recorded that the Lokpal's Inquiry and Prosecution Wings remained unoperationalised some twelve years after the Act's passage, and recommended urgent steps including the establishment of dedicated special courts, mandatory response timelines for pending complaints, and investment in digital case-management infrastructure to be implemented within six months of the Report.²¹ The Committee's findings corroborate, from within Parliament itself, the central thesis of this paper: that the institution's difficulties are not incidental administrative teething troubles but a structural consequence of a design that left critical enforcement machinery to be built through subordinate rule-making, without a statutory deadline or effective accountability mechanism for delay.

C. Declining Public Engagement and the BMW Procurement Controversy

Data placed on record in late 2025 disclosed a precipitous decline in citizen complaints received by the Lokpal, from 2,469 in the financial year 2022–23 to a mere 233 in 2025 a fall that independent commentators have attributed to public disillusionment with the institution's visible inertia and to procedurally rigid complaint-formatting requirements that result in the summary dismissal of a disproportionate share of genuine grievances.²² The same reporting drew attention to a tender issued by the Lokpal for the procurement of seven BMW motor vehicles for its members, a decision widely characterised in the press as difficult to reconcile with the institution's founding ethos of austere public accountability, and one that has arguably compounded rather than repaired the erosion of public confidence that comparative experience most notably that of Hong Kong's ICAC suggests is indispensable to an anti-corruption agency's long-term legitimacy.

²¹Parliamentary Standing Committee on Personnel, Public Grievances, Law and Justice, 145th Report on the Functioning of the Lokpal (Rajya Sabha Secretariat, 2025) as reported in 'Parliamentary Panel Suggests Urgent Steps to Operationalise Lokpal's Inquiry, Prosecution Wings' Hindustan Times (New Delhi, 3 December 2025) <<https://www.hindustantimes.com/india-news/parliamentary-panel-suggests-urgent-steps-to-operationalise-lokpal-s-inquiry-prosecution-wings-101764858098571.html>> accessed 11 May 2026.

²²Lokpal of India: Powers, Challenges and Role in Fighting Corruption' Insights on India (27 October 2025) <<https://www.insightsonindia.com/2025/10/27/lokpal-4/>> accessed 11 May 2026.

D. The 2025 Jurisdictional Controversy Concerning High Court Judges

On 27 January 2025, a Lokpal bench presided over by Chairperson Khanwilkar held that the Lokpal possessed jurisdiction to entertain a corruption complaint against a sitting or former High Court judge, reasoning that judges fall within the statutory definition of 'public servant' under the 2013 Act, notwithstanding the acknowledged difficulty that any resulting inquiry would inevitably require probing allegations against a member of the higher judiciary.²³ The Supreme Court, taking suo motu cognisance of the order, stayed its operation, with a Bench comprising Gavai, Surya Kant and Oka JJ describing the Lokpal's assumption of jurisdiction as 'something very, very disturbing'. The controversy revives the framework first articulated in *K Veeraswami v Union of India*, under which no criminal case may be registered against a High Court or Supreme Court judge without the prior consultation of, and concurrence with, the Chief Justice of India, whose view on the matter is treated as effectively binding upon the sanctioning authority.²⁴

The episode is instructive for two reasons. First, it demonstrates that even a decade after enactment, the Lokpal's jurisdictional boundaries vis-à-vis co-ordinate constitutional institutions remain unsettled precisely the kind of design ambiguity this paper argues was inadequately resolved at the drafting stage. Second, the Supreme Court's evident anxiety about the implications for judicial independence illustrates the perennial tension, visible also in the comparative material surveyed in Part II, between an anti-corruption body's investigative reach and the institutional autonomy of the bodies it may seek to investigate a tension that well-designed comparator institutions manage through carefully calibrated statutory carve-outs, which the Indian Act has, on this evidence, not yet achieved.

E. The Comparative Record of the State Lokayuktas

The central Lokpal's difficulties are thrown into sharper relief by the comparative record of the state Lokayuktas, several of which predate the 2013 Act by decades and offer a useful within-India comparator distinct from the international material surveyed in Part II. The Karnataka Lokayukta, established in 1984, is widely regarded as one of the more effective state-level anti-corruption bodies, and a detailed empirical study of its performance conducted shortly before

²³See the discussion in 'Can Lokpal Investigate High Court Judges' *Drishti Judiciary* (2025) <<https://drishtijudiciary.com/editorial/can-lokpal-investigate-high-court-judges>> accessed 11 May 2026.

²⁴*K Veeraswami v Union of India* (1991) 3 SCC 655.

the 2013 Act's passage attributed its comparative success to a combination of aggressive institutional leadership, a demonstrated capacity to conduct credible investigations, and genuine independence from the state executive, while identifying as its principal weaknesses a curtailed prosecutorial mandate and periodic political interference that blunted its efficacy. The same study cautioned that legislative design alone however carefully drafted cannot guarantee institutional success in the absence of sustained political will, adequate resourcing, and effective coordination with the ordinary prosecuting authorities, a caution that reads, in hindsight, as a remarkably accurate prediction of the central Lokpal's own subsequent difficulties.²⁵

By contrast, Lokayuktas in a number of other States have, as this paper's introduction notes, been rendered substantially ineffective by a combination of prolonged vacancies at the head of the institution, inadequate investigative staff, and the absence of any independent prosecutorial machinery answerable to the Lokayukta rather than to the state executive. The uneven performance of the state Lokayuktas over four decades of operation is itself a cautionary comparator for the central Lokpal: an institution's statutory powers on paper correlate only weakly with its effectiveness in practice, and the intervening variable political will translated into adequate, insulated resourcing is precisely what the central Lokpal has, on the evidence of Part VII, conspicuously lacked in its own first decade.

F. Adjacent Transparency and Accountability Jurisprudence

Two further decisions of the Supreme Court, though not directly concerned with the Lokpal, bear materially on the good-governance discourse within which the institution operates. In *Association for Democratic Reforms v Union of India*, the Court struck down the Electoral Bond Scheme of 2018 as unconstitutional, holding that the anonymised financing of political parties violated the citizen's right to information under Article 19(1)(a) and was incompatible with the transparency that electoral accountability demands.²⁶ The judgment is a significant contemporary marker of the judiciary's willingness to intervene, on transparency grounds, in matters of political finance that the Lokpal's own jurisdiction does not squarely reach, and it underscores the argument, developed further in Part IX, that the Lokpal cannot by itself close every gap in India's accountability architecture. Separately, in *Sita Soren v Union of India*, a

²⁵A Narayana, Sudhir Krishnaswamy and Vikas Kumar, 'Lokpal Bill: Lessons from the Karnataka Lokayukta's Performance' (2012) 47(1) Economic and Political Weekly 32, 32–36.

²⁶*Association for Democratic Reforms v Union of India* 2024 INSC 113 (Electoral Bonds case).

seven-judge Bench overruled the earlier decision in *P V Narasimha Rao v State*, holding that members of Parliament and state legislatures enjoy no immunity under Articles 105(2) and 194(2) of the Constitution in respect of acts of bribery connected with a vote or speech in the House.²⁷ Although decided outside the Lokpal's own docket, the ruling materially strengthens the wider anti-corruption framework within which the Lokpal operates, by closing a long-criticised immunity that had previously shielded legislative bribery from ordinary criminal process precisely the kind of systemic gap that civil-society commentators writing at the time of the 2011 movement had identified as requiring legislative and judicial correction alongside, and not merely through, the Lokpal itself.

Taken together, these developments present a mixed and somewhat sobering picture. The judiciary has, through the electoral bonds and legislative-immunity decisions, shown a continuing willingness to strengthen the wider accountability architecture. The Lokpal itself, however, remains beset by delayed leadership appointments, an unbuilt Prosecution Wing, declining public engagement, and an unresolved jurisdictional boundary with the higher judiciary a cumulative record that lends considerable empirical support to the hypothesis, examined further in Part IX, that the institution's own structural design constrains its capacity to deliver on the good-governance promise of 2013.

VIII. ASSESSMENT OF THE CONSTITUTIONAL AND STRUCTURAL CONTOURS OF THE LOKPAL

Several sharp structural features define the 2013 Act as presently framed, most notably the creation of a mandatory citizen's charter obligation and the corresponding removal, from the Union Parliament, of the power to itself constitute a Lokayukta within a State. The State governments' consistent position that a state Lokayukta, established under state legislation, is the appropriate body to investigate allegations of corruption against state ministers and officials sits in some tension with the federal character of the Constitution, since a Union-level Lokpal purporting to investigate matters falling squarely within state executive competence risks trenching upon the federal distribution of powers. Article 253 of the Constitution offers a potential, though contested, route past this objection: it permits Parliament to legislate even on matters otherwise falling within State competence where such legislation gives effect to an international treaty obligation, and the Lokpal and Lokayuktas Act was in part justified by

²⁷*Sita Soren v Union of India* 2024 INSC 161.

reference to India's accession to the United Nations Convention against Corruption.²⁸

A useful, if imperfect, domestic precedent for this Article 253 route is the Protection of Human Rights Act 1993, enacted to give effect to India's obligations under the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights of 1966, and which led to the establishment of the National and State Human Rights Commissions across the country. That precedent notwithstanding, the federal-policy objection to the Lokpal's structure has not been definitively resolved by either statute or binding judicial pronouncement, and it remains a live constitutional fault-line one compounded, as Part VII shows, by the 2025 controversy over the Lokpal's jurisdiction over the judiciary, a separate but structurally analogous instance of the institution's boundaries with co-ordinate constitutional authorities being tested in practice rather than settled in advance.²⁹ The government's own justification for concentrating investigative energy at the apex of the administrative pyramid rests on a 'trickle-down' theory of institutional integrity the proposition that curbing corruption among senior functionaries will, over time, discipline conduct further down the administrative hierarchy. The empirical record surveyed in Part VII, in which the volume of Lokpal complaints has fallen sharply even as the institution's leadership has finally stabilised, offers only limited support for that theory.

A further design gap concerns individual accountability for non-performance. Team Anna's original proposal contained specific measures for holding an individual officer responsible where a citizen's grievance was left unresolved through demonstrable non-performance; the government chose to hive this element off from the Lokpal Bill and to route it instead through a separate Citizens' Charter and Grievance Redressal Bill, a measure that, as Part VI notes, remains substantially unenacted more than a decade later. The consequence is that the Lokpal, as enacted, addresses corruption in the narrower, more classically criminal sense, while the broader administrative-responsiveness dimension of good governance arguably the dimension that touches the largest number of citizens in their everyday dealings with the state has been left comparatively under-institutionalised.

A structural parallel worth noting is the constitutional treatment of administrative tribunals under Article 323-A, introduced by the Constitution (Forty-second Amendment) Act 1976,

²⁸R Dhavan, 'Engrafting the Ombudsman Idea on a Parliamentary Democracy: A Comment on the Lokpal Bill, 1977' (1977) 19(3) Journal of the Indian Law Institute 257, 268.

²⁹T S R Subramanian, *India at Turning Point: The Road to Good Governance* (Rupa Publications 2014) 214.

which likewise sought to create specialised adjudicatory bodies outside the ordinary judicial hierarchy. The subsequent history of tribunalisation in India marked by repeated judicial intervention to preserve minimum standards of independence, most notably in *L Chandra Kumar v Union of India* where the Supreme Court held that tribunals could not wholly oust the constitutional jurisdiction of the High Courts under Articles 226 and 227 offers a cautionary parallel for the Lokpal.³⁰ Just as the tribunal system's promise of speedy, specialised justice was, in practice, undermined by delayed appointments, inadequate infrastructure and periodic executive interference with tenure and selection, the Lokpal's own promise of speedy, independent anti-corruption enforcement risks a similar fate unless the structural lessons of the tribunalisation experience chiefly, that independence guaranteed on paper must be continuously defended in administrative practice are applied to its ongoing implementation.

IX. CONCLUSION

The hypothesis animating this paper that the Lokpal, by reason of its inherent structural and design features, is unable to resolve the problem of corruption to the fullest extent contemplated at its inception is, on the evidence surveyed above, substantially borne out. The difficulties identified are traceable to the drafting stage itself: the separation of the citizens' charter from the Lokpal's own jurisdiction, the unresolved tension between the Act's Union-level reach and the federal distribution of powers, and the absence of any statutory deadline for the establishment of the Inquiry and Prosecution Wings that were meant to be the institution's operative core. The comparative analysis and the contemporary developments reinforce one another: institutions that combine investigative and prosecutorial power with genuine independence, the Hong Kong ICAC being the clearest example, succeeded because that independence was operationalised promptly and defended consistently, whereas the Lokpal's own machinery remained substantially unbuilt for over a decade, a delay now formally acknowledged by Parliament's own Standing Committee.

Corruption has, for too long, been treated with a measure of societal indulgence in India. The moment has arrived for committed public institutions the Lokpal foremost among them to treat it with the seriousness the Constitution's framers plainly intended when they enshrined equality and the rule of law as foundational commitments. Robust legislative measures in the spirit of the original Jan Lokpal Bill remain necessary, but legislation by itself cannot substitute for

³⁰*L Chandra Kumar v Union of India* (1997) 3 SCC 261.

sustained attention to the deeper causes of corruption; institutional reform pursued in isolation from the wider social determinants of corrupt practice including entrenched poverty and gaps in basic literacy is unlikely to succeed on its own terms. The average citizen has increasingly come to question whether the promise of justice carries a different, attenuated meaning depending on the stratum of society in which the citizen stands, or depending upon the relative power wielded by the person against whom a grievance is directed; if the answer to that question is genuinely affirmative, the entire edifice that the idea of justice has been built upon over centuries stands materially compromised.³¹

It remains genuinely difficult to conceive how the Central Bureau of Investigation could ever have conducted a wholly dispassionate inquiry into its own political masters under the pre-2013 architecture; character alone, however important, is an insufficient safeguard, and a minimal institutional structure that actively fosters, rather than merely permits, integrity within the investigating body is indispensable to its efficient operation. The Lokpal represents a genuine attempt in that direction. But an attempt is not, without more, an achievement: the revitalisation of the CBI's own institutional character, the reform of the parliamentary Selection Committee process, the enactment of a parallel citizens' charter law, and the establishment of an equally effective Lokayukta in every State remain, a decade on, unfinished business. Without them, the institution that the Aam Aadmi was promised in 2011 risks remaining not merely bland but genuinely indigestible.

A final observation is warranted before turning to the specific reforms proposed below. Institutional design, however carefully calibrated, is only ever a necessary and never a sufficient condition for the eradication of entrenched corruption. The comparative analysis shows that even the most independent and best-resourced anti-corruption agencies took a generation to establish the public trust on which their continuing effectiveness ultimately rests; the Lokpal's own first decade should accordingly be read not as final proof of institutional failure, but as an early and remediable chapter in what is, on any honest comparative assessment, a multi-decade project. The task for Indian administrative law scholarship and for Parliament alike is to ensure that the second decade of the Lokpal's existence is markedly more consequential than the first and the concrete measures set out below are offered in that

³¹Dhananjay Mahapatra, 'Can Lokpal be Investigator, Prosecutor, Jury and Judge?' *The Times of India* (Mumbai, 27 June 2011) <<https://timesofindia.indiatimes.com/india/Can-Lokpal-be-investigator-prosecutor-jury-and-judge/articleshow/8991206.cms>> accessed 6 May 2026.

constructive spirit.

X. SUGGESTIONS AND THE WAY FORWARD

Address Structural and Design Flaws. The Lokpal and Lokayuktas Act 2013 requires legislative revisitation to resolve the federalism objections. A constitutionally sounder division of labour between the Union Lokpal and State Lokayuktas one that preserves state autonomy over purely state-level allegations while retaining Union jurisdiction over matters with an genuinely inter-state or national dimension would reduce the risk of future constitutional challenge and would also address the jurisdictional uncertainty over the higher judiciary exposed by the 2025 controversy discussed.

Enforce Statutory Deadlines for Operational Machinery. The single most damaging feature of the Lokpal's first decade has been the absence of any binding deadline for establishing the Inquiry and Prosecution Wings. Parliament should amend the Act to impose a fixed, judicially enforceable timeline for the operationalisation of both wings, coupled with mandatory periodic reporting to the Standing Committee along the lines recommended in its 145th Report.

Enhance Independence and Insulate Selection from Political Influence. The Selection Committee's composition and procedure should be strengthened, and the security of tenure of Lokpal and Lokayukta members reinforced, so that removal cannot be effected save through a process at least as rigorous as that applicable to a sitting judge of a constitutional court. Full financial and administrative autonomy a dedicated, non-transferable investigative cadre on the Hong Kong ICAC model, rather than personnel seconded from and returning to the very departments under scrutiny would materially strengthen institutional independence.

Integrate a Robust and Justiciable Citizens' Charter. The long-pending Citizens' Charter and Grievance Redressal legislation should be enacted and its provisions expressly integrated with the Lokpal's own functions, so that non-performance and administrative delay which together constitute the majority of citizen grievances, can be addressed within a single, coherent accountability framework rather than through parallel and uncoordinated statutes.

Strengthen the Wider Anti-Corruption Ecosystem. Rather than pursuing the wholesale replacement of the CBI and existing vigilance machinery, a more realistic strategy is a synergistic division of labour, in which the Lokpal concentrates its limited institutional capacity

on high-profile corruption while strengthened departmental and state-level bodies handle lower-level cases, all operating within a transparent and mutually accountable framework an approach broadly consistent with the layered enforcement architecture found in the Singaporean and Hong Kong model.

Rebuild Public Trust Through Transparency and Restraint. The sharp decline in complaint volumes is on the comparative evidence, symptomatic of eroding public confidence rather than of declining corruption. A real-time, publicly accessible digital dashboard enabling citizens to track the status of their complaints, simplified complaint-filing formats that reduce dismissal on purely technical grounds, and visible institutional restraint in matters of official expenditure would together do more to rebuild the Lokpal's credibility than any further expansion of its formal powers on paper.

Taken together, these measures would not resolve every structural difficulty canvassed in this article, but they would move the Lokpal appreciably closer to the comparative benchmark set by the more durable anti-corruption institutions, and closer still to the good-governance objective that animated the 2011 movement from which the institution itself was born.