
A STUDY ON POLICE BRUTALITY AND CUSTODIAL DEATH IN INDIA

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ABSTRACT

Custodial death is one of the worst crimes in a civilized society. The main objective of establishing police force in a country is prevention of crime. But Police in India usually adopt practices of torture for the law enforcement. They torture the accused in the name of investigation and to extract confession from them. they also torture innocent people and bystanders. The human rights violation by them are verbal abuse, assault, threat of death or injury, humiliation, deprivation of food etc., On women, they torture them in the form of molestation, rape and sexual harassment. The main aim of this study is to identify the roles and responsibilities of police against the citizen of India and to find out practical solutions to curb police brutality which is against the basic human rights and constitutional rights.

Keywords: police force, human rights, violations, police brutality, crime, protection

1. Introduction:

The police brutality and custodial deaths have become a serious issue in India which violates the protection of fundamental rights guaranteed by the Constitution of India. Even with the legal safeguards, cases of torture, abuse, and deaths in police custody have been increased in this country. These shows the reality between law and the reality; the police officials often abuse their powers without fear of consequence. The continued occurrence of custodial death and police brutality makes the public to question the legal system in India. the numbers of cases filed are rapidly increases but justice is rarely served.

The reasons for custodial deaths are systemic failures which includes Lack of training, poor infrastructure, and violence as a policing norm are some of the major factors that contribute to the problem. Torture is the most common practice used by many police officers as a tool for obtaining information from offender which is strictly prohibited by law and international treaties. Political interference protects the wrong doer from being held accountable and it affects the image of India as a democratic country that stands for human rights and justice.

The enforcement of legal provisions is weak and irregular. The Constitution of India provides the right to life and liberty, and there are also provisions against torture and custodial violence, but the enforcement agencies are not able to enforce these rights. The National Human Rights Commission and the judiciary have been important in addressing these violations, but their efforts are often interrupt by lack of cooperation from the police authorities. Custodial deaths in India can only be prevented by filling the gap that exists between the law and its implementation.

2. Statement of the problem:

The issue of police brutality and custodial deaths in India remains a challenge to the protection of human rights and the integrity of the judicial system Even with the legal safeguards, cases of torture, abuse, and deaths in police custody have continued to be occurred in the country. These shows the reality between law and its application. Victims and their family do not able to get justice due to corruption, political influence and delays in the investigation and trial process. The offenders of the custodial torture are rarely held accountable. This not only affect public confidence in the police and the justice system but also affect the image of India as a democratic state that upholds justice and equality. The continued cases of custodial violence

indicate a flaw in the policing approach, the enforcement of human rights laws, and the oversight role of institutions that are supposed to protect the citizens.

3. Review of the literature:

Karthikeyan, 2023 says that the police use short cuts to manage their workloads and for want of resources. So, they refuse to register the complaints given to them to avoid increasing of number of cases reported daily, Hesitation to take steps for collecting forensic evidence and recording statement of witnesses instead torturing innocent persons making them admit the commission of crime which they have no connection.¹

Pandey, 2025 says that Judicial guidelines has created safeguards against custodial deaths but enforcement remains poor at the ground level. Custodial deaths in India reflects the abuse of power. Despite Supreme Court guidelines compliance is weak due to lack of political will and institutional accountability. Stricter monitoring and accountability mechanisms are required to ensure the constitutional protections.²

Dhiman, 2025 says that the Supreme Court laid down procedural safeguards for arrest in D.K. Basu v. State of West Bengal. Without statutory backing these judicial guidelines remain weak in practice. Separate statute is necessary to strengthen protections against torture and custodial deaths. Judicial ruling alone cannot prevent custodial.³

India., 2017 says that the absence of a specific law against torture leaves victims without justice. India's failure to ratify the UN Convention Against Torture affect the image of India in protecting human rights. analysis shows that countries with anti-torture laws have stronger accountability mechanisms. Legislative gaps weaken India's human rights framework. The Commission recommended a draft anti-torture bill, but still, it remain unimplemented.⁴

Rao, 2021 says that the Sathankulam custodial deaths in Tamil Nadu exposed system failure in supervision and medical documentation. Public and media coverage forced accountability measures including arrests of police personnel. When custodial practices are exposed to the

¹ Karthikeyan, M. (2023, March 29). Police atrocity in India – A critical study. International Journal of Law. ISSN: 2455-2194

² Pandey, A. (2025). Custodial deaths and police brutality in India: Legal safeguards and implementation gaps.

³ Dhiman, H., & Dhiman, P. (2025). Custodial violence in India: Role of Supreme Court in prevention.

⁴ Law Commission of India. (2017). Implementation of UNCAT.

public eye the Transparency and public accountability decrease custodial violence.⁵

4. Research gap of study:

Although there have been some studies conducted to analyze the police brutality and custodial deaths in India most of the existing study has been primarily related to legal provisions and statistics. Most of the research has been pointing towards the provisions provided by the constitution regarding such deaths, but there has been very little that has been investigated into regarding the efficiency of these provisions. Socio-economic aspects of custodial deaths, especially among marginalized classes. There have been very few studies that have been conducted Most of the studies have been legal, criminology- related, and have very little to do with sociology, economics, and psychology

5. Objective of the study:

1. To find out how often custodial deaths and police brutality occur in India
2. To analyze the social and economical reasons behind custodial torture
3. To evaluate how the courts respond when lives are lost in custody, and whether families of victims receive justice
4. To understand the relationship between law and economics by exploring how poverty, marginalization makes particular people more vulnerable to custodial violence.
5. To suggest practical reforms that can protect human rights, and rebuild public trust in law enforcement.

6. Methodology:

This research is based on both doctrinal and non – doctrinal research the source of data collected from different newspaper, journal, magazine, all India reports and E – resources this research is used some of the statistical tool such as percentage method and average method the size of the respondent are 104 the duration of the research is three months

⁵ Rao, S. (2021). Case study: Sathankulam custodial deaths and public accountability.

7. Significance of the study:

The research study on police brutality and custodial death in the Indian context will be a great benefit to the government in formulating policies that respect human rights and protect democracy. Giving attention to the disparities between constitutional protections and the realities, this study aims to implement changes in policing techniques and mechanisms of accountability. The study may aid the government in developing a training module that focuses on humane approaches to get information from the offender in police custody. This study highlights the socio-economic aspect of custodial violence, and the government may then act upon. Learning from this research study technology upgrades such as CCTV cameras can be implemented in police stations.

It will also be beneficial for me to understand the issue of police brutality and custodial deaths in India. It allows me to critically examine the gap that exists between the constitutional safeguards and their implementation in society. It helps me to link theoretical knowledge with real challenging situations for a marginalized community and I can be able to suggest practical reforms which may bring change. It helped me to develop my academic writing and research skills. It helped me understand the role of transparency and accountability in governance

8. Hypothesis of the study:

This research study is based on these two hypotheses.

H1 : custodial death are adequately investigated in India

H2 : stronger legal safeguards can significantly reduce police brutality

9. Limitation of the study:

The research is only dependent on secondary data obtained through reports from the NCRB and NHRC. Very little direct access is possible to first-hand information. Therefore, it puts an extra limitation on human – centered analytical frameworks of this study. No large-scale fieldwork or interviewing was conducted for this study thus limiting the qualitative dimensions of the analysis. Legal analysis is limited to some major Supreme Court judgments while leaving out numerous lower court judgments. Finding the actual implementation of safeguards is challenging in this study also due to the lack of transparency in official records.

Recommendations are theoretical and might need further empirical testing.

10. Result and discussion:

PART – A: Doctrinal research

Introduction:

The word custody implies guardianship and protective. custodial death is one of the worst crimes in a civilized society. The police play important role in safeguarding our life, liberty and freedom but the police must act properly and should show respect to the human right of the people⁶ In India where the practice and phenomenon of custodial death have been in practice ever since the sovereignty of our country was in the hands of Britishers. In most cases, FIRs are not registered against the culprits and hence they often go unpunished.⁷ The victims of custodial deaths are mostly the poor, illiterate, underprivileged and marginalized sections of society who have no political or financial stability

As per NHRC data, Police custody death cases recorded at 175 in 2021-2022, 100 in 2020-21, 112 in 2019-20, 136 in 2018-19, 146 in 2017-18 and 145 in 2016-17.⁸

Historical background:

Torture and violence have been identified with the police in India ever since the Vedic age (2,000 to 1,400 B.C.) the ordeals of water, fire and single combat dual were considered as a legal method to sneeze out the truth. Manu who originated the law of this country and kautilya who propounded his “Artha Satra” emphasized the necessity of torture to protect the society from the hand of criminals and evildoers. tortures like burning of limbs, mutilating of limbs, tearing by wild animals, trampling to death by elephants or bulls etc. From 712 A.D. to 1857 there was Muslim rule in the country. Muslim rulers took a savage pleasure in witnessing torture with greater cruelty and ferocity and they administered criminal justice on the basis of religion and creedal discrimination under “Shariat law”.

The Indian penal code enacted by the British in 1860 after assumption of power and abolished

⁶ Custodial death and judicial response in India. (n.d.).

⁷ Jasir Aftab, & Khan, N. (n.d.). Custodial torture and deaths: The dark side of Indian police.

⁸ National human rights commission

the “Shariat law” and they encouraged brutality and Third degree against terrorist revolutionaries or anti – British elements and used special powers and extra – legal methods⁹

Types of custodial death:

Custodial deaths can be classified mainly into three categories:

Death in police custody:

The police must bring the suspect before a judicial officer within the jurisdiction within 24 hours after recording his arrest. Before recording of arrest, the suspect might have taken into police custody, it is the crucial time in which he might undergo threat, harassment, and torture during police interrogation. There is no proper record at what time the suspect had been taken into the police custody. Most of the police officers and subordinates believe that they are above the constitution.

Death in judicial custody:

Judicial custody means the authorized police officer cannot investigate the suspect unless it is approved by the court, presented before the magistrate and kept in the jail under the order of the magistrate in order to assure the presence of him during the proceedings of the court. In both the police and judicial custody, the police personnels have an upper hand on the accused.

Death in custody of army (military officer or personnel) or paramilitary force:

Death of the suspect while in the custody of army (military officer or personnel) or paramilitary force.¹⁰

Causes for the police excess

Human Rights watch; an international non-governmental organization has recently expressed its concern about human rights violation by police in India. It through its research found out various causes for the said violations. The working conditions of police officers in India mainly contribute to their excess. They are required to be available on duty 24 hours a day. Sometimes

⁹ Chande, M. B. (2022). *The police in India*. New Delhi: Atlantic Publishers.

¹⁰ International Journal of Law Management & Humanities. (n.d.). *International Journal of Law Management & Humanities*.

they stay at police station itself through out a day. They are separated from their families for a long period of time. They use short cuts to manage their workloads and for want of resources. For example, they refuse to register the complaints given to them to avoid increasing of number of cases reported daily, Hesitation to take steps for collecting forensic evidence and recording statement of witnesses instead torturing innocent persons making them admit the commission of crime which they have no connection. So, its high time that state must give police enough resources to discharge their duties efficiently. They should be given proper training both physical and mental, sophisticated equipment and encouragement to act ethically while handling cases reported to them.¹

Custodial Torture and Marginalized Communities:

Custodial torture mainly affects socially and economically backward class people in India due to their vulnerability and lack of resources. Caste brings in another level of structural inequality in the complex hierarchy of justice itself. The person who is to be investigated for theft, if the person belongs to the Dalit caste, he will be beaten and humiliated for the wrong which is not done by him. Among prison inmates, 69 percent are from SCs, STs, or OBs, as are 65 percent among those not produced to Courts (undertrials). Similarly, poor people also wrongly arrested by law enforcers in our country. Furthermore, poor people face a different process of justice in our country than those enjoyed by rich people. Rich people have the luxury to deal with justice from within their air-conditioned rooms.¹¹

Gendered Dimensions of Custodial Torture in India:

Custodial torture in India reveals another gendered dimension, with male victims such as Ajith Kumar often subjected to enforced emasculation that operates both physically and psychologically. Such practices are not merely intended to extract confessions but to humiliate, strip dignity. Women who have been subjected to sexual assault as a means of investigation. Scenes of rape and molestation have been used to break the spirits of women in jail and make them submit to authority also women who lose male members of their family face economic consequences. In a patriarchal country such as India, where men are the breadwinners, a custodial death erases entire families into extreme hardship. State compensation, like the Tamil

¹ Karthikeyan M (2023) Police atrocity in India – A critical study. *International Journal of Law*.

¹¹ The Geostrata. (2025). The long violent arms of law: Police pride, caste prejudice & India's custodial death crisis. *The Geostrata Journal*.

Nadu government's grant of ₹5 lakh and employment to Kumar's family, brings limited solace. No such measure can return lost lives and futures.¹¹

United Nations Declaration:

The Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment (the “Torture Convention”) was adopted by the UN General Assembly in 1984 and entered into force in 1987. India signed UNCAT in 1997, but still it has not been ratified yet by the government of India.

The Prevention of Torture Bill:

India, being a third-world country, signed the “Convention against Torture or Other Cruel, Inhuman, or Degrading Treatment or Punishment” (UNCAT) back in 1997. Even after 20 years of signing the Convention, India has not ratified in 2008, a bill on the prevention of torture was introduced for the first time in the Parliament for their approval. After its review, it was decided to send the bill to the select committee because of its lacking provisions. The select committee, after reviewing the bill, made a draft, which was presented to the Upper House of Parliament in 2010; however, it has been stuck over there ever since. A former union minister of law in 2016 filed a petition in the Supreme Court of India for India’s compliance with UNCAT and to make the dead bill of 2010 come to life. During the hearing in the apex court, the Law Commission of India submitted its 273rd report, which recommended the government ratify the UNCAT and further proposed the “Prevention of Torture Bill, 2017.” On their recommendations, the bill was again introduced in 2017, and it is still being discussed in the parliament.¹²

Constitutional safeguard for custodial torture:

Article 21 – Every person should be free from torture, cruel, inhuman treatment or punishment and it apply to all individual including prisoner. Article 20 (1) –This provision states that no person can be convicted for an act that was not an offence under the law at the time it was committed. Article 20 (1) It ensure that individuals cannot convict twice for the same wrong. Article 20 (3) – Protection Against Self-Incrimination the police should force the accused to

¹¹ The Geostrata. (2025). The long violent arms of law: Police pride, caste prejudice & India’s custodial death crisis. The Geostrata Journal.

¹² Rights of Prisoners against Custodial Torture in India By: Shivam Jasra

testify against them. Article 22(1) no person should not be arrested without being informed why they are arrested. Article 22(2) The arrested person must be produced before the magistrate within 24 hours.

Statutory Safeguards Against Custodial Torture:

Section 120, Bharatiya Nyaya Sanhita (2023) The police or any authority should not cause any hurt to extract confessions or information from accused if it is done it is considered as custodial violence. Section 35, Bharatiya Nagarik Suraksha Sanhita (BNSS, 2023) The arrests and detentions of any person should have a valid reason and should follow proper documented procedures. Section 22, Bharatiya Sakshya Adhinyam (2023) the evidence which is obtained through torture, threat or coercion cannot be admitted in court.

Challenges in Addressing Custodial Torture in India:

Lack of Specific Anti-Torture Legislation

India signed the United Nations Convention Against Torture (UNCAT) in 1997 but has yet to ratify it. As a result, existing provisions remain weak and inadequate and leave significant gaps in accountability.

Weak Enforcement and Impunity

Data between 2017 and 2022 highlights systemic impunity: out of 345 judicial inquiries into custodial deaths, there were 123 arrests and 79 chargesheets, but zero convictions. Similarly, in 74 human rights violation cases involving illegal detention, torture, or deaths, only three convictions were recorded against police officials. This reflects a culture of weak enforcement and near-total impunity for custodial violence.

Overburdened Institutions

Human Rights Commissions (NHRC and SHRCs) lack binding powers and depend heavily on government funding, limiting their effectiveness. Ineffective police complaints authorities in many states, creates conditions that facilitate abuse and inhuman treatment.

Fear of Reprisal Among Victims

Victims often afraid to report torture due to fear of retaliation, lack of legal aid, and threats

during complaint processes. Marginalized groups such as Dalits, minorities, and tribals are particularly vulnerable.

Judicial and Systemic Failures

Lengthy judicial proceedings, overburdened courts, witness intimidation, and the absence of adequate fast-track courts delay justice in custodial death cases. Moreover, poor compliance with the D.K. Basu Guidelines (1996)—which mandate arrest memos, medical examinations, and legal access.¹³

a) Related case law:

CL 1: D.K. Basu v. State of West Bengal (1996)

The case given eleven guidelines to prevent torture and death in Custody, with a focus on the Indian Constitution's article 21 right to life and Article 22 protection against arbitrary detention. The development of an arrest memo the means attested by a witness, police personnel wearing obvious identification tags, and the detainee's right to notify a friend or relative of their arrest are all important rules. The verdict also compels medical evaluations and accountability for the state in case of wrong doing.¹⁴

CL 2: Sheela Barse v. State of Maharashtra (1983)

Sheela Barse argued that women detainees were vulnerable to abuse and directed the state to ensure their safety. The court held that the women prisoner should have separate lock-ups for them and the female suspects must be guarded only by female constables. It remains a landmark case in protecting women from custodial torture.¹⁵

CL 3: The Joginder Kumar v. State of U.P. (1994)

The Supreme Court held that an arrest of the person should be justified and necessary. The Court held that personal liberty under Article 21 requires protection against unnecessary detention. The court directed that relatives or friends of the arrested person must be informed

¹³ Drishti IAS. (2025, July 4). Custodial torture in India. Retrieved from <https://www.drishtiiias.com/>

¹⁴ D.K. Basu v. State of West Bengal. AIR 1997 SC 610; (1997) 1 SCC 416.

¹⁵ sheela Barse v. State of Maharashtra. AIR 1983 SC 378; (1983) 2 SCC 96.

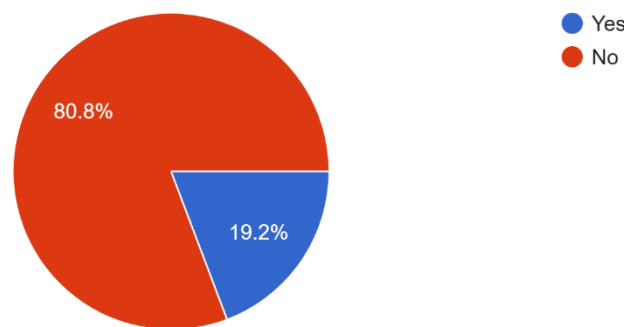
properly. This judgment remains a landmark in safeguarding individual rights.¹⁶

PART-B NON-DOCTRINAL RESEARCH

Table No. 1: Did the victims of custodial death receive justice

Gender	Yes	No	Total
Female	11 (10.57)	32 (30.76)	43 (41.34)
Male	9 (8.65)	52 (49.99)	61 (58.65)
Transgender	0 (0.00)	0 (0.00)	0 (0.00)
Total	20 (19.23)	84 (80.76)	104 (100.00)

SOURCE: PRIMARY DATA



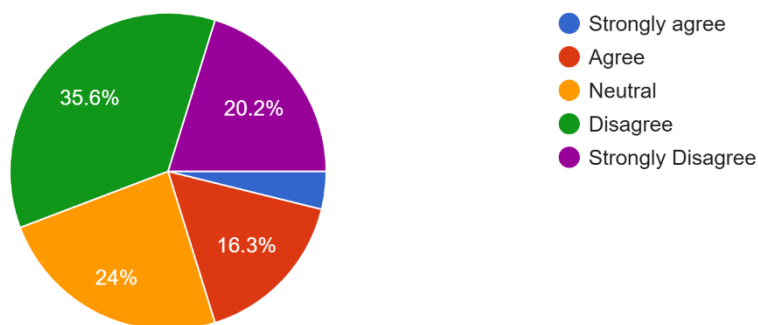
The pie chart illustrates that out of 104 respondents, 80.8 percentage believe that victims of custodial deaths do not receive justice in most cases, while only 19.2 percentage believe that justice is delivered. This highlights a significant lack of confidence in the justice system among the majority of participants.

¹⁶ Joginder Kumar v. State of Uttar Pradesh. AIR 1994 SC 1349; (1994) 4 SCC 260

Table No. 2: Custodial death is adequately investigated in India

Gender	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
Female	3 (2.88)	7 (6.72)	15 (14.42)	15 (14.42)	3 (2.88)	43 (41.34)
Male	1 (0.96)	10 (9.61)	10 (9.61)	22 (21.15)	18 (17.30)	61 (58.65)
Transgender	0 (0.00)	0 (0.00)	0 (0.00)	0 (0.00)	0 (0.00)	0 (0.00)
Total	4 (3.84)	17 (16.34)	25 (24.03)	37 (35.57)	21 (20.19)	104 (100.00)

SOURCE: PRIMARY DATA



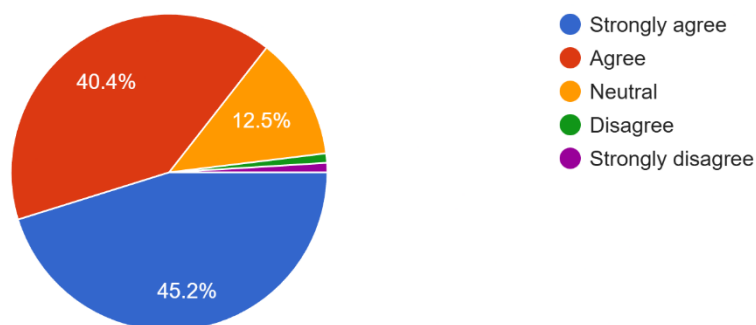
The pie chart shows that most respondents do not believe that custodial deaths are properly investigated in India. Half of the respondents, specifically 55.8 percentage, disagreed with the statement, indicating they believe the investigation process is not functioning correctly. 24 percentage of respondents remained neutral, suggesting they are unsure or lack proper information. Only 16.3 percentage of respondents agreed that custodial deaths are adequately investigated in India. Overall, this demonstrates that public trust in the investigation process is weak and there is a need for better communication to improve confidence in how custodial deaths are handled.

Table No. 3: Stronger legal safeguards can significantly reduce police brutality

Gender	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
Female	23 (22.11)	11 (10.57)	8 (7.69)	1 (0.96)	0 (0.00)	43 (41.34)

Male	24 (40.38)	31 (29.80)	5 (4.80)	0 (0.00)	1 (0.96)	61 (58.65)
Transgender	0 (0.00)	0 (0.00)	0 (0.00)	0 (0.00)	0 (0.00)	0 (0.00)
Total	47 (45.19)	42 (40.38)	13 (12.5)	1 (0.96)	1 (0.96)	104 (100.00)

SOURCE: PRIMARY DATA



The pie chart reveals that most people believe stronger legal safeguards can help in reducing police brutality in India. Over 85 percentage of respondents agreed with the statement, showing that they see legal reforms as a key solution. 12.5 percentage of respondents remained neutral, indicating some uncertainty, while very few disagreed. These results suggest that people generally think stricter laws are necessary to protect citizens' rights.

a. Testing of hypothesis:

H1: custodial death is adequately investigated in India

Table No.2 indicates that most respondents do not believe custodial deaths are properly investigated in India. More than half of the respondents, specifically 55.8 percentage, disagreed with the statement, showing a lack of trust in the investigation process. Only 18 percentage of respondents agreed with the statement, while 24 percentage remained neutral. This supports the alternative hypothesis (H1), which states that most people believe custodial deaths are not adequately investigated in India.

H2: stronger legal safeguards can significantly reduce police brutality

Table No.3 reveals that the majority of respondents agreed with the statement. More than four-fifths of the participants, specifically 85.57 percentage, agreed with the

statement, indicating a strong belief that stronger legal safeguards will protect people from custodial torture. Only 1.92 percentage of respondents disagreed, while 12.5 percentage remained neutral. The data supports the null hypothesis, which suggests that stronger legal safeguards are widely believed to significantly reduce police brutality.

Conclusion:

From the above findings, we can conclude that human rights are available to every individual, whether they are a civilian or a criminal. The prison bars cannot prevent individuals from enjoying their basic rights. It has also been established that individuals in police custody in India are entitled to the 'Right against custodial torture' under Article 21 of the Constitution. However, looking at the current situation in India and reports by the National Human Rights Commission and other organizations like Amnesty International, it is evident that this right is still being violated in Indian prisons on a daily basis, even though politicians deny it. The Indian government, being a signatory to the "United Nations Convention against Torture", has failed to fulfill its obligation to protect this right for individuals, including prisoners. Hence, to stop the use of torture in India, the Indian government needs to ratify the UN Convention Against Torture and pass the 'Prevention of Torture Bill', which was first introduced in 2010.¹²

Suggestion:

1. To use body cameras and automated external defibrillators can help in preventing police custodial deaths.
2. To use DDTs, which deploy technologies such as polygraph, narco-analysis, and brain mapping, should be used to obtain information from criminals regarding a crime.
3. To ratify the United Nations Convention Against Torture (UNCAT) and pass the Prevention of Torture Bill.
4. To Mandatory Installation of CCTV Cameras in All Custodial Areas
5. To Establish a separate body to investigate custodial deaths

¹² Rights of Prisoners against Custodial Torture in India By Shivam Jasra

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