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DEATH PENALTY AND ITS EVOLUTION IN THE INDIAN LEGAL SYSTEM: A CRITICAL STUDY

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Abstract

Human life plays a great role in the society because of its importance where it paves a way to lot of emotions and attachments in cycle of nature. That may be the reason why human life is valuable in this everlasting universe and sets humans apart from other living things. The death penalty may be understood in its most basic form, which is when the State takes a person's life after due process for a serious crime they have committed. However, the death sentence is not new in the modern world; it dates back to an era that seems to have no end. It was used in every human community throughout the ages. The 21st century has brought forth something unique in that it freely acknowledges that the death sentence should be abolished, providing compelling arguments and perspectives as well as specific guidelines for when it should be applied. The death penalty has become a contentious subject, with several emerging nations taking a stand on it and doing away with it. India is a well-known developing nation that has not succeeded in ending the death penalty, but in the rarest of circumstances has abolished the death penalty. Even if there are several laws that specify penalties, the idea of the death penalty is essential to the criminal justice system. The death penalty has caused a lot of problems for modern civilization. This article aims to present and expand upon the general perspective on the death penalty and its evolution in India.

Keywords: *Death sentence, India, Legal system, Humanity, Heinous Crime*

Introduction

Criminals do not die by the hands of the law. They die by the hands of other men.”

George Bernard Shaw

Since everyone in our society follows the same set of rules and laws, there is a general sense of harmony. Every nation has laws and constitutions, and those who disobey them face consequences. Is a crime with a penalty any offense's penalty is determined by how serious it is. The United States of America, which moved to outlaw the death sentence, was the first to question the death penalty's constitutionality. The death penalty is known as capital punishment in India. The death sentence is allowed under Section 53 of the Indian Penal Code, 1860. The High Court has the authority to impose the death penalty under Section 368 of the Code of Criminal Procedure. The death penalty is used in situations when heinous crimes are committed and the public's collective conscience is so shocked by the crimes that it expects the court to execute the offenders. They can remain under the purview of significant instances.¹ The idea of substituting life in prison for the death sentence is now being explored. The death penalty has been postponed for so long that convicted convicts endure physical and psychological suffering while living in a state of hopelessness and despair, according to the Supreme Court's repeated rulings. When the death penalty is applied humanely, the sentence of the prisoner must be altered to life in prison. In addition to making the death sentence more effective, new research indicates that postponing the trial of death row inmates benefits the criminal and his family. It is reported that 371 inmates in India were awaiting execution as of the end of December 2017. Only four of the 27-year-old offenders in the 1991 case we're working on received the death penalty in 13 years. In 13 years, just four prisoners three guilty of terrorist offences and one who had raped a minor were executed.

According to a 2015 investigation, delays have prevented death row inmates from receiving their sentences. During the 2018 Supreme Court hearing, two of the four convicted rapists and murderers had their death sentences maintained. The decision drew criticism from several organisations. The death penalty has been abolished in several nations. India has occasionally opposed the United Nations' proposal to outlaw the death sentence. Every United Nations member state is free to choose its own laws and standards of punishment. According to the Supreme Court's ruling, India must restrict the use of the death sentence. Even eminent

¹J. P. S. Siiohi, Criminology and Criminal Administration. 4th ed., (1992), p.109

academics who advocated for the social contract idea, such as Thomas Hobbes, John Locke, and Plato, backed and encouraged this kind of punishment for serious crimes. In the case in question, the idea of punishment underwent a transformation in society that ultimately resulted in the death penalty, also known as the capital punishment, being abolished. This controversial topic was brought to light by renowned criminologist Cesare Beccaria, who persuaded a large number of people that the death penalty should be abolished on the grounds that it is inhumane, pointless, and, in legal terms, a public assassination.

Michigan was the first state to outlaw the death penalty in 1846; Portugal and Venezuela did the same in 1867. When the United Nations was formulating the 1948 Universal Declaration of Human Rights, they also advocated the abolition of the death sentence.

INTERNATIONAL SCENARIO AND ITS POSITION

The death penalty is a worldwide topic that is significant in international affairs and is reflected in several national laws around the globe. Several reasons have been made in favour of the death sentence.

Union of Nations (UN): The United Nations often plays a significant role in defending human rights in this fashion. They acknowledged that every nation must adhere to strict standards of fair trials and that the procedures that are followed must be just, fair, and reasonable. Furthermore, several international accords have stated the significance of human rights in the criminal justice system. A few are listed below:

Article 5 of the Universal Declaration of Human Rights 1948 provides that no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

- **Article 7 of the International Covenant on Civil and Political Rights (ICCPR) 1966** provides that no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment. Subsequently, the UN made recommendations on when to use or abolish the death sentence in relation to the preservation of human rights. Here are some recommendations:
- In nations that have not yet abolished the death penalty, it can only be used to the most heinous crimes.
- Currently in effect laws only permit the application of the death penalty in cases of grave transgressions.
- The penalty cannot have any retroactive effects.

- Why Death sentences shouldn't be applied to young people who were under 16 years old when the offence was committed.
- Anyone convicted to the death penalty has the right to appeal to a higher court, and measures should be made to guarantee that this right is protected; the death penalty cannot be used to pregnant women, new mothers, or crazy people.

POSITION AND CONSTITUTIONAL VALIDITY OF DEATH PENALTY IN INDIAN SCENARIO

The death penalty has undergone several dimensions of modification, entailing various types of punishment since the beginning of time. The Indian Penal Code, 1860 (IPC), which is the public law and substantive criminal law that defines crimes and specifies punishments, is where the death penalty in India originated. The death penalty and life in prison are available as alternate forms of punishment under Section 53 of the Indian Penal Code. As of right now, India recognises the death penalty as a legitimate punishment.

For major offences, the death penalty has been deemed applicable. The Indian court asserts this by upholding the country's constitution, which defines "protection of life and personal liberty" as Article 21. No one "shall be deprived of his life or personal liberty except as according to procedure established by law," according to this article. According to this article, every Indian citizen is guaranteed the right to life. The Indian Penal Code (IPC) imposes the death penalty as a penalty for a number of acts, including murder, waging war against the state, aiding and abetting a mutiny, dacoity with murder, and anti-terrorism. The Indian Constitution allows the President to dispense the death penalty.²

This article comes into picture whenever the subject of the death penalty or capital punishment comes up. It forces the judges to re-evaluate the case and force them to consider their options before imposing a death sentence or other punishment. Additionally, Article 14 of the Constitution states that "equality before law and equal protection of the laws" means that no one can face discrimination unless it is necessary to attain equality. The preamble of the constitution echoes the idea of equality included in Article 14. Therefore, it would appear that a capital sentence is the opposite of a person's right to life.

²K .D . Gaur, Commentary on the Indian Penal Code, p.161

It is an unavoidable reality that the Indian Constitution does not specifically declare the death penalty to be illegal, despite several clauses implying that the death penalty is permitted within the terms of the document. Nonetheless, a number of clauses in the constitution, including the preamble, the Fundamental Rights, and the Directive Principles, might be used to argue against the legitimacy of the death penalty.³ It is evident that the death penalty was only applied to a small number of dangerous criminals. This implies that a person's life may end at any moment following the death of another person or the commission of another grave crime. The main point of contention is that everyone has an inalienable right to life, which no one may violate unless doing so would require sacrificing their own life. Many academics and legal professionals contend that it is against an individual's right to life for Indian criminal legislation to even maintain the death sentence. It is argued that these knowledgeable jurists most likely ignore the reality that not even the right to life is unalienable.

Although the Indian Penal Code's provision for the death penalty has been challenged on several occasions, the Supreme Court has always maintained that the death penalty is constitutionally permissible. There were several reasons both in support of and against the death penalty. Additionally, the constitutionality of the death penalty may be taken into account from two different angles. First, the issue is whether the death penalty in general is unlawful and should never be applied. Stated differently, the question is whether or not there is a mechanism that prohibits the imposition of the death penalty for any kind of conduct.

Secondly, although the death penalty in and of itself might not be unconstitutional, the question is whether the death penalty as it is stipulated in different sections of the Indian Penal Code is unconstitutional because those sections violate specific provisions of the constitution. To have a comprehensive understanding of the topic at hand, these two parts of the situation might need to be taken into consideration independently.

(i) Constitutionality of capital punishment as such.

(ii) Constitutionality of the provisions of I.P.C providing for capital punishment.

³ ibid

DISCUSSION OF LANDMARK CASES DEALING WITH DEATH PENALTY IN INDIA

Examining whether the death penalty or the death sentence is constitutionally permissible is a crucial consideration for the criminal justice system. The majority of India's historic cases concern both the legitimacy of the death penalty and its application. When debating the matter, the idea of **RAREST OF RARE CASE** also became relevant.

The first case addressing the constitutional legality of the death penalty in India was **Jagmohan Singh v. State of Uttar Pradesh**⁴. In this case, the appellant's counsel presented three arguments that invalidate section 302 of the IPC. The appeals council also argued that the death penalty violates all of the rights guaranteed by Article 19 (1) of the Constitution, and the court upheld their arguments. The second point put out was that there was no set criteria or policy that guided the discretion used to determine which cases should result in the death penalty. Thirdly, it was claimed that Article 14 of the constitution, which protects equality before the law, was broken by this unrestrained and unguided discretion. It was said that in several instances, two people who had committed murder ended up with one receiving the death penalty and the other receiving life in jail. Additionally, it was argued that the death sentence contradicts the Constitution's articles 19 and 21 in addition to article 14. The reason the method is unclear in this situation is that, once the accused is found guilty, there is no legal process in place to decide whether the death penalty or some other less severe punishment is suitable in that specific instance.

However, the Supreme Court disregarded this argument, ruling that "the court always gives the accused a chance to address the court on the question of death penalty in important cases like murder." The Court also ruled that "deprivation of life is constitutionally permissible as long as it is carried out in accordance with the legal process." In and of itself, the death penalty is neither irrational nor opposed to the general welfare. The difficulties of setting criteria is the root of the legal doctrine that grants judges extremely broad discretion when it comes to punishment. It would be difficult to try to establish guidelines for why punishment should be increased in certain situations and decreased in others. The same holds true for the penalties imposed for other Code violations and murder, which is penalised by section 302 I.P.C. There isn't a formula that could offer a rational standard for the countless situations that might alter

⁴AIR 1973(1) SCC 20

how serious a murderous offence is. The fundamental basis of the criminal law as "applied in India which invests the Judges with a very wide discretion in the matter of fixing the degree of punishment" is the inability of setting standards.

However, the situation in **Rajendra Prasad v. State of Uttar Pradesh**⁵ changed in contrast. According to Justice Krishna Iyer, the courts have not given much thought to the humanistic mandate of the Indian Constitution, which is crucial to the penal code's punitive approach in this "life or death" situation when people are subject to the law. Our judgement primarily focuses on this striking human rights discrepancy. Section 302 of the Indian Penal Code and Section 354(3) of the Code of Criminal Procedure must be read in the context of the human rights of Parts III and IV, as further elucidated by the Preamble to the Constitution. This is case law within the confines of the Penal Code, which is impregnated by the Constitution.

Furthermore, he maintained that until it could be demonstrated that the offender posed a threat to society, the death penalty would not be appropriate. Furthermore, it was decided that granting the judge authority under section 354(3) of the Cr.P.C. to choose between a life sentence and the death penalty for "special reasons" would violate Article 14, which forbids arbitrariness. He begged that the death penalty be abolished and kept exclusively as a form of punishment for "white collar offences". It is argued that the minority ruling is accurate since, following the I.P.C. amendment and the ruling in Jag Mohan Singh's case, life in prison is now the norm rather than the death penalty. The judges have the authority to select between the two penalties at their discretion.

LAW COMMISSION REPORT

When it comes to discussing the significant rulings on the death sentence in India, the Law Commission Report is an essential and indispensable element. Its debate centres on the legitimacy of the death penalty, a point of contention that the judges in the Jagmohan case also emphasised. In 1967, the Law Commission of India issued and presented its 36th Report to the Government following a thorough and in-depth investigation of the topic of the death sentence in India. The decision to apply the death sentence or capital punishment is based on weighing the pros and cons of each side. Arguments must be presented fairly, rationally, and with sufficient weight. The strength of many of the arguments varies from case to case and is

⁵AIR 1979 3 SCR 78

difficult to rule out in all circumstances. The severity of the death penalty, the necessity for a contemporary strategy, and the strong sentiment expressed by some segments of the population over more fundamental issues of human values.

Considering the current state of affairs in India, the diverse social upbringing of its citizens, the differences in moral and educational standards across the nation, the size and diversity of the country, and the critical need to preserve law and order at this time, India cannot afford to take a chance on the experiment of abolishing the death penalty.

The second most significant ruling in the historic case of **Ediga Anamma v. State of Andhra Pradesh V.R. Krishna Iyer and R.S. Sarkaria**⁶, replaced the death penalty with life in prison in addition to a twelve-year moratorium on hanging. The personal grounds for the substitution included youth, imbalance, sex, and being kicked out of her marriage.

CONCEPT OF RAREST OF RARE

One of the most significant instances that raise the legitimacy of the death penalty is **Bachan Singh v. State of Punjab**⁷, which gave rise to the idea of the "rarest of rare cases." This particular case gave rise to the concept of the "rarest of the rare cases" and continues to spark discussion on whether the death penalty is still permissible under Article 21 of the Constitution. While upholding the death sentence, the Supreme Court stated that it is incompatible with a genuine and unwavering respect for human life to take a life via the use of the legal system.

Judges have long wondered whether and under what conditions the death sentence may be used, what crimes are punishable by it, how much of an impact it has on sentencing, and other related questions justice in the victim's case. It was also established that the Court must give equal weight to the criminal and the offence when determining whether or not there are "special reasons" in a given case. Investigating the aggravating or mitigating variables is necessary. When determining the appropriate penalty, factors such as the accused's age, mental state, and whether or not the conduct was carried out at the behest of a superior must be taken into account. In this case, Justice Bhagwati was the only one to disagree, but the problem was that his ruling was rendered just two full years after the verdict was rendered. Thus, a few of his most important objections to the death sentence were never raised. Furthermore, he felt that

⁶AIR 1974SCR(3)329

⁷AIR 1980SCC684

Article 14, which protects equality before the law, is plainly broken by this very idea. Furthermore, it is against Articles 19 and 21 since there is no established procedure for when the state may take away someone's life or personal freedoms. In addition to discussing the cruelty and irresponsibility associated with the death sentence, Justice Bhagwati demonstrates via reason and statistical evidence why the death penalty is ineffective in achieving any of penological goals.

In the case of **Mithu v. State of Punjab**⁸, the mandatory death penalty under Section 303 was ruled to be illegal due to constitutional violations. The reasoning for this provision was that a person who has been convicted of a life sentence and is still capable of killing someone is too cold-blooded and unreformed to be let to live. Since Section 303 was deemed to have violated Articles 14 and 21 of our Constitution by the courts in Mithu's case, it was removed from the IPC.

Additionally in the cases of **Sher Singh v. Punjab**⁹ and **T.V.Vatheeswaram v. State of Tamil Nadu**¹⁰. The Supreme Court had to decide whether a protracted delay in carrying out the death penalty was sufficient justification for commuting it to life in prison. The majority in the second judgement disagreed with the first, which established that the prisoner had sufficient grounds to use section 21 and get a lighter sentence in such a circumstance.

Four men were given the death penalty in the **Macchi Singh v. State of Punjab**¹¹ case by both the sessions court and the high court for killing seventeen people—men, women, and children at their houses throughout the night in five different occurrences. A family dispute was the driving force. Three of the four people's death sentences were affirmed by the Supreme Court. Speaking for the court, Justice Thakkar felt compelled to try to define the "rarest of rare" case and determine punishment in order to further clarify the "rarest of the rare rule," which describes circumstances in which the imposition of the death penalty might be appropriate. Judge M.P.

Thakkar made the following points:

- ✓ Manner of Commission of Murder
- ✓ Motive for the commission of murder

⁸AIR 1983(2) SCC 277

⁹AIR 1983 (2) SCC 344

¹⁰AIR 1983(2) SCC 68

¹¹AIR1983SCR(3)413

- ✓ Nature of crime
- ✓ Magnitude of crime
- ✓ The personality victim of the murder

CONCLUSION

The use of the death penalty has always raised ethical and societal questions across the globe. Execution is not only a punishment; it is more than that since, in accordance with the principles of human rights, it is immoral and shows a lack of regard for human life. Execution is the process of murdering someone who is accused of a horrible crime in the name of justice. Furthermore, refusing to execute a criminal does not imply that the person is endorsing the offender. The Indian Constitution, as well as various other national constitutions, recognizes the validity of the death penalty and guarantees the right to life and human dignity. Even though India is a participating member of the UN and supports its elimination, the death penalty is still permitted under our national laws. This is due to the terrible conditions and circumstances surrounding crime in today's world; two of the most notorious incidents to date are the gang rape cases in Hyderabad and Delhi. As a result, society wants justice to be just as harsh as the crime committed. This is the reason India continues to apply the death sentence. However, we must recognise that even if the death sentence is a severe punishment.

Everyone should always remember that "No one has the right to take away one's life" unless it is required by law. Current events and problems with the death sentence are mostly the consequence of a failure to consider the nature of crime. The subject of whether the death penalty is still necessary is raised. The death penalty has been abolished in the majority of nations; yet, it should be emphasised that in today's society, when every individual stands for himself, the death sentence is still necessary. Severe punishment is necessary to deter potential offenders and to guarantee that the peace, tranquilly, and order of society are not jeopardised. For the sake of one prisoner who doesn't even deserve to exist in a society of civilised people, the State cannot jeopardise the lives of hundreds of thousands of innocent people. The death penalty must thus remain in place.

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