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OMBUDSMAN (LOKPAL) INSTITUTION IN INDIA AND SWEDEN: A COMPARATIVE ANALYSIS

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ABSTRACT

The paper presents a comparative analysis of the ombudsman institutions in India and Sweden, focusing on their frameworks, structures, powers, and impact on anti-corruption and accountability in governance. While India's Lokpal was established under the Lokpal and Lokayuktas Act, 2013, and lacks constitutional status, Sweden's Parliamentary Ombudsman holds a constitutional position, lending it greater autonomy and efficacy. The study discusses challenges faced by the Lokpal, including limited jurisdiction, political influence in appointments, and lack of suo motu investigation powers, which hinder its ability to effectively tackle corruption. In contrast, Sweden's Ombudsman operates with broader jurisdiction, covering all branches of government, and has the authority to initiate investigations independently, enhancing its role in ensuring public accountability.

The paper identifies key areas for reform within the Lokpal framework, advocating for a transparent appointment process, inclusion of judicial oversight, expansion of investigative powers, and robust whistleblower protection. By learning from the Swedish model, India could strengthen the Lokpal's role in combating corruption and improving governance. Through this analysis, the study emphasizes the need for systemic reforms in India to realize the Lokpal's potential as an effective anti-corruption body, ultimately fostering a transparent and accountable governance framework.

INTRODUCTION

Governments and the citizens are said to be the two sides of one coin. Improving the relationship and the interaction between the people and their government have always been at the dawn of civilization from policymakers to administrators. Good governance has its basis in the interaction and trust between people, government, and bureaucracy. There are three aspects that characterize good governance: transparency, accountability, and equity. Corruption

constitutes a serious threat to these principles. The effective operation of democratic institutions creates a persistent challenge in which the fight against corruption impacts the core of public trust and institutional integrity.

For instance, Indian investigating agencies such as CBI and CVC have traditionally found themselves with stringent hurdles in effective dealings with high-level corruption. One of the principal reasons for such constraints is their relative lack of autonomy, especially since most of them operate under the influence of the executive to an extent that allegations of political interference and selective investigation become quite frequent. The Supreme Court of India often called CBI a "caged parrot"¹ that it fails to perform independently, especially when cases involved powerful politicians or government officers. Likewise, in the case of CVC, limited jurisdiction and powers to investigate create an inability to handle corrupt practices effectively as a whole.

The structural weaknesses thus pointed to critical urgency for a more robust and independent body to address corruption at high government echelons. Attaining good governance and taking strides to close state-citizenry gaps necessitated pressing demand for an institution that had the capacity to redress grievances and help get them resolved promptly. In this regard, Lokpal was instituted as an independent ombudsman not under direct control of the executive but with judicial powers to investigate cases against public functionaries, including the Prime Minister and members of the Parliament. It was crucial that such a mechanism be in place for reviving public confidence in anti-corruption machinery so that no one, not even the most powerful can transcend accountability. That is, as an independent body, it has the mandate to address grievances on corruption issues directly as well, filling the gap present in and between all these agencies.

It is, in the annals of Indian governance, the potential answer to the nagging problem of corruption that besets the country-the establishment of Lokpal as an independent body. As an open and autonomous public office, for Ombudsman, if Lokpal is to succeed, must bear such characteristic traits as independence, impartiality, fairness, credibility within the review process, and confidentiality. These basic qualities are thus etched into the legal texts that delineate the position of the Ombudsman. Endowed with comprehensive investigating powers,

¹ Arvind Kejriwal v CBI (2024)INSC 687, Manohar Lal Sharma v Principal Secretary & Others (2014) 2 SCC 532

the Lokpal is almost a spontaneous coincidence with the Spanish term 'Defensor del Pueblo,' which translates literally to "defender of the people." In becoming an intermediary between citizens and the state, the Ombudsman contributes to the landscape of better governance, where basic rights will be approached with dignity, the rule of law will be placed above all other considerations, and international legal standards of greater acceptance are honored.

Hoping to promise so much during its inception, the Lokpal has remained ineffective; it has taken minimal significant actions and shown less transparency in its operational affairs, thus leaving the issues of corruption in India largely unresolved. The delay to its first chairperson to be appointed would be six years after the Lokpal Bill act came into effect, thereby undermining its effectiveness right from the start. Its independence was a concern further dented by the fact that political officials at some point were directly involved in the choosing process. Sweden has been the first country to initiate the institution, and after one-and-a-half decades, proved to be very effective as it has ranked sixth on the Corruption Perception Index while rankings for India have decreased from 85 in 2022 to 93 in the year 2023.²

This calls for a comparative study in investigating the two countries' ombudsman institutions, their structures, functions, implementations, successes, and possible shortcomings. This paper presents a comparative analysis of the ombudsman institutions in India and Sweden, tracing their origins, legal frameworks, powers, functions, and how they are effectively working to correct administrative inefficiencies and corruption. By comparing variations in structures, procedural mechanisms, and challenges that both systems present, this paper aims to outline the role of the institution of the ombudsman within public accountability to help govern more effectively in different forms of political environments. Furthermore, it tries to draw lessons for India from the great experience of Sweden.

LOKPAL IN INDIA

The Lokpal and Lokayuktas Act, 2013, which came into force in 2014, established the Lokpal with jurisdiction over public servants in India, including the Prime Minister, Union Ministers, and Members of Parliament. Below is an outline of the structure of the Lokpal. It has no constitutional status. Lokpal is a statutory body.

² Transparency International, 'Corruption Perceptions Index 2023' <https://www.transparency.org/en/cpi/2023> accessed [Oct 2, 2024].

Composition and Appointment- Section 2 to 6 of Lokpal and Lokayuktas Act, 2013³

- The Lokpal is a multi-member body consisting of a chairperson and up to eight members.
- The chairperson of the Lokpal must be one of the following: a former Chief Justice of India, a former judge of the Supreme Court, or an eminent individual of impeccable integrity and exceptional competence with at least 25 years of expertise in areas such as anti-corruption policy, public administration, vigilance, finance (including insurance and banking), law, or management.
- Judicial members of the Lokpal must be either a former judge of the Supreme Court or a former Chief Justice of a High Court.
- Non-judicial members should be distinguished individuals of impeccable integrity and exceptional competence, possessing a minimum of 25 years of expertise in fields such as anti-corruption policy, public administration, vigilance, finance (including insurance and banking), law, or management.
- Of the maximum eight members, half must be judicial members, and at least 50% of the total members must represent Scheduled Castes (SC), Scheduled Tribes (ST), Other Backward Classes (OBC), minorities, or women.
- The tenure for the chairperson and members of the Lokpal is five years or until they reach the age of 70, whichever is earlier.
- Members are appointed by the President based on the recommendations of a selection committee. This committee is chaired by the Prime Minister and includes the Speaker of the Lok Sabha, the Leader of the Opposition in the Lok Sabha, the Chief Justice of India (or a judge nominated by them), and one eminent jurist. To assist in the selection process, the committee constitutes a search panel of at least eight members.

Lokpal search committee

Under the 2013 Act, the government is required to compile a list of candidates interested in serving as the Chairperson or members of the Lokpal. This list is then sent to an eight-member search committee, which shortlists potential candidates and submits their names to the selection panel, headed by the Prime Minister. The selection panel has the authority to accept or reject the names proposed by the search committee.

³ The Lokpal and Lokayuktas Act 2013, s 2, 3, 4, 5, 6.

The selection committee is chaired by the Prime Minister and includes, among others, the Speaker of the Lok Sabha, the Leader of the Opposition in the Lok Sabha, the Chief Justice of India (or a Judge nominated by the Chief Justice for this purpose), and an eminent jurist. To assist in making recommendations for the Chairperson and members, the selection committee is required to appoint a search committee comprising at least eight members.

Jurisdiction, Powers and Functions of Lokpal

The Lokpal is empowered to investigate cases of maladministration involving injustice, allegations of favoritism, or personal benefit by a public authority. Its jurisdiction extends to the Prime Minister, ministers, Members of Parliament (MPs), and officers and officials of the central government in Groups A, B, C, and D. While the Prime Minister falls under the Lokpal's purview, matters related to international relations, security, public order, atomic energy, and space are excluded. Additionally, the Lokpal cannot investigate ministers or MPs for anything said or any vote cast in Parliament.

The Lokpal's authority also covers individuals who have held leadership roles (such as directors, managers, or secretaries) in organizations or societies established under central laws or entities funded or controlled by the central government. This jurisdiction extends to anyone involved in or abetting acts of bribery or related offenses. The Lokpal Act mandates the declaration of assets and liabilities by all public officials and their dependents. A significant amendment to Section 44 replaced the fixed 30-day deadline for submitting these declarations with a requirement to do so in a manner and timeline prescribed by the government, providing greater flexibility.

The Lokpal has oversight and control over the Central Bureau of Investigation (CBI). When referring a case to the CBI, the Lokpal must authorize any transfer of the investigating officer to ensure impartiality. The Lokpal's inquiry wing is vested with the powers of a civil court.

Under certain conditions, the Lokpal may attach assets, proceeds, or benefits acquired through corrupt means. It can also recommend the transfer or suspension of public servants facing corruption charges. Furthermore, the Lokpal has the authority to issue orders to prevent the destruction of documents during preliminary investigations. Complaints regarding corruption must be filed within seven years from the date of the alleged offense.

OMBUDSMAN IN SWEDEN

The Parliamentary Ombudsmen of Sweden is a constitutional body that plays an important role in ensuring legal compliance and accountability in public activities. The Ombudsman was originally established in the Constitution by the Act of 1809. Articles 96 to 100⁴ describe the general form of this institution and emphasizes heavily on the independent office acting as a prosecutor as well in regards to treating judges and other officials. Articles 101 to 106⁵ referred to the role of the Ombudsman in bringing cases of impeachment instituted before Parliament. More importantly however, the Riksdag Act of 1866 referred to Article 68,⁶ which contained procedures on the election of the Ombudsman and further procedures to be followed in case he would resign. Both the Acts were later substituted, the Instrument of Government 1809 was replaced by the Instrument of Government Act 1974 and the Riksdag Act of 1866 was replaced by the Act of 2014. The parliamentary ombudsman is established under Chapter 13, Article 6⁷ of the Instrument of Government and are elected by the Riksdag or Swedish Parliament according to provisions given under Chapter 13, Article 2 to 4 of the Riksdag Act of 2014.⁸ It is established to monitor the enforcement of laws and other legislation in different governmental as well as public activities. Their role entails ensuring public officials and bodies are bound to observe the law and answer their actions.

Composition and Appointment

- There are four Parliamentary Ombudsmen; this includes one Chief Parliamentary Ombudsman who serves as the head and three other Parliamentary Ombudsmen
- The Riksdag is also given authority to appoint Deputy Ombudsmen who can be former high judicial officers or even retired justices of the Supreme Court and the Supreme Administrative Court.
- The Chief Parliamentary Ombudsman and the other Parliamentary Ombudsmen are elected to a six-year term and can be re-elected for three years. The deputies are elected for two years.
- Election may take in the form of secret ballot or other such electoral process as in the election of Speaker of Riksdag.

⁴ Instrument of Government 1809, art 96, 97, 98, 99, 100

⁵ Instrument of Government 1809 art 101, 102, 103, 104, 105, 106

⁶ Riksdag Act 1866, art 68

⁷ Instrument of Government Act 1974, art 6, chapter 13

⁸ Riksdag Act 2014 art 2, 3, 4

- No office or occupation shall be held by an Ombudsman that could compromise the independence or discredit his work.
- The Riksdag may dismiss the Ombudsman if the assembly loses confidence in him. If an Ombudsman resigns before the end of his term, the Riksdag elects a new Ombudsman to complete the incumbent's term.

Jurisdiction, Powers and Functions of an Ombudsman

The Ombudsmen supervise and oversee public activities pursuant to laws and statutes, by ensuring that public authorities and officials act within the principles of law. This also includes the power to obtain copies of all documents and records in courts, administrative bodies, or public officers for investigation or inquiry purposes. Once the Ombudsmen establishes such involvement in unlawful practice or activities, they must take legal action as necessary. In such scenarios, they can also act as prosecutors during the impeachment of judges or other officers. Courts and judicial systems, administrative offices and officers shall provide him all the required information and views that they may require. A public prosecutor may, further, aid an Ombudsman in the conduct of their work if they deem it necessary.

The primary responsibility of the Ombudsman is to investigate complaints and reports of maladministration or wrongful actions by government agencies, public servants, and other authorities. The Ombudsman's mandate includes ensuring that government actions adhere to Swedish law, regulations, and constitutional principles. Investigations by the Ombudsman can cover a wide range of issues, including issues related to civil liberties, government transparency, fairness, and legality in public administration. The Ombudsman's office is accessible to the public, and individuals can submit complaints and reports directly to the Ombudsman. Complaints can be submitted in writing, online, or in person at the Ombudsman's office.

The Ombudsman reports to the Swedish Parliament and provides regular reports on its activities and findings. The Ombudsman's reports may contain recommendations for improving government agencies' practices and ensuring that they act in accordance with the law. The Swedish Parliamentary Ombudsman contributes to transparency and accountability in government actions by conducting independent reviews and investigations into allegations of misconduct or violations of rights.

COMPARISON

A comparative study of the Lokpal of India and the Parliamentary Ombudsman of Sweden can help to understand how both systems differ from each other. It can also help to analyze the best practices that can be adopted by India. It reveals a pretty sharp distinction in terms of structural and jurisdictional differences and operative effectiveness:

1. Constitutional Status

The Lokpal is defined by the Lokpal and Lokayuktas Act, 2013⁹, and doesn't have constitutional status. Its authority and influence is therefore constrained because it is essentially governed by a legislation that may be amended or repealed by the Parliament.

The Parliamentary Ombudsman have constitutional status, set up in pursuance of Article 6 of Chapter 13 of the Instrument of Government¹⁰. This constitutional status gives him a higher status and protection against political influence.

2. Appointment Process

The Lokpal is nominated by the President of India. He appointed on suggestion given by the selection committee that consists of the Prime Minister, Speaker of Lok Sabha, and other constitutional authorities. This somehow involves significant political considerations, which might impact the Lokpal's independence.

The Ombudsman in Sweden is directly elected by the Riksdag (Swedish Parliament). It is a more democratized and transparent process that diminishes the opportunity of political influence when electing the Ombudsman.

3. Term of Office

Members to the Lokpal, including the Chairperson, are in office for five years.

The term for the Ombudsman is six years with scope for re-election so that the element of continuity and experience in the office is not lost.

4. Jurisdiction

Lokpal's jurisdiction is limited particularly in respect to the jurisdiction of the Prime Minister's office. It can't investigate issues relating to international relations, security, public order and atomic energy, and space. Lokpal doesn't have jurisdiction over the judiciary

The Ombudsman in Sweden does not have such exclusions. It covers all government

⁹ Lokpal and Lokayuktas Act 2013

¹⁰ Instrument of Government 1974, art 6, chapter 13

activities, including judicial activity, which is an essential part of accountability in the larger public sector.

5. Powers of Inquisition Lokpal

The Lokpal cannot initiate suo motu action investigations, which considerably dilutes the scope for proactive measures against corruption.

The Swedish Ombudsman has suo motu powers, allowing it to act suo motu and to investigate suo motu public grievances, that is, without waiting for any complaint to come before it.

6. Time Limit for Complaints

The complaints regarding corruption shall be filed within seven years of the alleged offense. This may discourage people from coming up forward, especially in cases where corruption has been on for long periods.

There is no time limit for presenting complaints to the Ombudsman. It makes the system more open and responsive to the people's grievances.

7. Binding Recommendations

The recommendations of Lokpal have no binding authority on the Parliament, allowing them to go unaddressed and undermined the very purpose of the institution.

The recommendations by the Ombudsman has binding authority on the Riksdag in Sweden. The report and recommendations given to the Parliament are expected to be taken seriously by it and acted on the same.

8. Removal from Office

Removal of Lokpal members, including the Chairperson, by a recommendation from the Supreme Court, that comes after an agreement by 100 Members of Parliament to present a petition to the President.

The Ombudsman can be removed through the Riksdag if they lose the confidence of the assembly, thus possibly being a direct accountability mechanism.\

LIMITATIONS AND CHALLENGES FOR LOKPAL

1. Delay in Lokpal Appointment

After the enactment of the Act, it took six years for Lokpal to be constituted. The Report of the Standing Committee on Personnel, Public Grievances, Law and Justice 2016¹¹ states that the reason behind this delay is absence of the Leader of opposition, who is

¹¹ Standing Committee on Personnel, Public Grievances, Law and Justice, *Eighty-first Report on the Lokpal and Lokayuktas (Amendment) Bill, 2016* (Rajya Sabha Secretariat 2016).

an important constituent of the selection committee. This shows that no political agreement was reached and, hence, for the first Lokpal, a post that has existed since 2013, came into being nearly six years after the Act had been passed into law.

2. Limited Independence

Since all the members of the Lokpal appointing committee hail from political parties, it raises concerns about political influence on lokpal. Lokpal appointments are made by the Prime Minister, Lok Sabha Speaker, and Leader of the Opposition—all are political figures. According to Transparency International's India Corruption Study 2017¹², if the selection committee has political figures included, it means that the independence of Lokpal has been undermined and that risk of political interference increases; this can defeat the purpose of the high-level corruption task force by frustrating its effectiveness.

3. Whistleblower Protection

It is ironic that the Whistle Blowers Protection Act (Amendment), 2015¹³, which was supposed to protect the whistleblower, has instead failed to do so. The Lokpal Act was widely criticized that even it was not able to protect those who expose corruption. The chilling effect is provided in the very nature of this provision in relation to issuing an inquiry against the whistleblower if the accused is proved to be innocent. Secondly, the Lokpal does not entertain anonymous complaints which discourages people from coming forward.

4. Exclusion of the Judiciary

Another disadvantage to this system is that the Lokpal does not include the judiciary within its review scope. The Second Administrative Reforms Commission 2007,¹⁴ a report had recommended including the judiciary under the Lokpal for making the anti-corruption framework across all three organs of governance all-inclusive. The 2013 Act excluded the judiciary, and its reasoning cited preservation of judicial independence. Critics believe that this exclusion leaves the anti-corruption framework incomplete.

5. No Constitutional Status and Appeal Mechanism

The Lokpal fails to attain constitutional status that derogates its power. According to the National Campaign for People's Right to Information NCPRI 2016 Report¹⁵, the

¹² Transparency International India, *India Corruption Study 2017: To Improve Governance* (Transparency International India 2017).

¹³ Whistle Blowers Protection (Amendment) Act 2015

¹⁴ Department of Administrative Reforms and Public Grievances, Second Administrative Reforms Commission, *Report on Ethics in Governance* (2007).

¹⁵ National Campaign for People's Right to Information (NCPRI), *Report on Right to Information in India* (2016).

lack of constitutional status undermines the authority and makes it prone to changes in politics. The report also showed that the Act lacks definite appeal mechanisms that will challenge the decision of the Lokpal, thereby tainting its process on fairness aspects.

6. Time Barrier to lodging complaints of Corruption

The seven-year period for lodging corruption complaints is a significant obstacle to holding public servants accountable. According to the Lokpal Review Report by PRS Legislative Research 2018,¹⁶ many incidences of corruption are likely to come into light several years down the line, especially cases pertaining to systemic corruption. This time limit appears arbitrary and may deny rightful investigation of legitimate complaints.

7. Popular perception of Weakness of Lokpal

The Lokpal is often called a "toothless" body. It can only investigate cases referred to it by the government or courts and does not have suo motu powers to start investigations, this highly inhibits the Lokpal's ability to act independently and decisively in addressing corruption, in particularly politically sensitive cases.

SUGGESTIONS

- Appointments for Lokpal should be free from political influence to ensure independence of the high office of Lokpal. India can adopt a model where there is more neutral and independent members such as judicial members or civil society members so that the number of political leaders on such a committee is reduced.
- The Lokpal should have its jurisdiction over judicial officers, and judicial officers fall into the category of public servants, just like in Sweden. The Lokpal should hence also be empowered to ensure accountability over all offices of the three organs of government, including the judiciary in India.
- India should strengthen the Whistle Blowers Protection Act by providing greater anonymity and protection to those who file corruption charges. Whistleblower protection should also ensure not to punish them for retaliatory actions or baseless inquiries in case their allegations do not lead to conviction.
- The Lokpal shall be empowered to initiate investigations based upon credible information in the public domain or by dint of media reports without waiting for an

¹⁶ PRS Legislative Research, *Lokpal Review Report* (2018).

official complaint, it would endow the Lokpal with great capability to combat corruption. It would make the Lokpal independent and prompt enough to act.

- Lokpal should function effectively with an admin streamlined process, adequate staff and resources, and clear timelines for case resolution. This would prevent bureaucratic delays that burden the institution.
- To make the Lokpal more user-friendly, India needs to streamline complaint filing such that citizens may file complaints either online or at offices as local as possible. This will further enhance citizen participation in the battle against corruption.

CONCLUSION

The establishment of the Lokpal and Lokayuktas Act, 2013 was a monumental legislative effort in India's long-standing battle against corruption. It represented a watershed moment that reflected the growing public demand for accountability and transparency in governance. However, more than a decade after its passage, the Lokpal institution has not lived up to its intended promise. A combination of political influence, limited jurisdiction, insufficient powers of investigation, and inadequate whistleblower protection has rendered the Lokpal relatively ineffective in its mandate to root out high-level corruption. When compared to other models, notably Sweden's Parliamentary Ombudsman, the Lokpal's weaknesses become even more pronounced, highlighting the need for systemic reforms to strengthen this critical institution.

One of the most pressing concerns with India's Lokpal is its lack of political independence. While the selection process includes members from various fields, the fact that the selection committee is composed of political leaders raises concerns about potential political bias. This is especially troubling given that corruption investigations often involve high-ranking officials. The current process makes the Lokpal vulnerable to political influence, which hampers its ability to function as an independent body. In contrast, Sweden's Parliamentary Ombudsman is appointed through a transparent, merit-based process by the Swedish Parliament (Riksdag). The Ombudsman in Sweden is known for being completely insulated from political pressures, which enables it to pursue investigations with greater freedom and integrity.

Another major limitation of the Lokpal is the restricted scope of its investigative powers. Although the Lokpal has the authority to investigate complaints of corruption, these powers are often curbed by procedural delays, bureaucratic hurdles, and overlap in jurisdiction with

other agencies such as the Central Bureau of Investigation (CBI). These factors not only delay investigations but also result in inconclusive or ineffective resolutions. Moreover, the Lokpal lacks the power to initiate suo motu investigations, which further curtails its effectiveness. Sweden's Parliamentary Ombudsman, on the other hand, is empowered to take independent action and initiate investigations without waiting for government approval or external complaints. This autonomy allows the Swedish Ombudsman to act swiftly and efficiently in cases of corruption or maladministration, thereby enhancing public confidence in the institution.

Judicial accountability is another area where the Lokpal in India falls short. The exclusion of the judiciary from the purview of the Lokpal has been widely criticized. Given the significant role the judiciary plays in governance and the potential for corruption within it, keeping the judiciary out of the Lokpal's ambit limits the institution's overall impact. In Sweden, the Parliamentary Ombudsman has the authority to investigate and hold the judiciary accountable for its actions. This broader jurisdiction allows for a more comprehensive check on corruption across all branches of government, a feature sorely missing in the Indian model.

One of the key areas of reform for the Lokpal should be the protection of whistleblowers. Whistleblowers play a vital role in exposing fraud and corruption, yet the Lokpal Act offers them insufficient protection. Many potential whistleblowers in India are discouraged from coming forward due to fear of retaliation, harassment, or even physical harm. The absence of strong legal safeguards for whistleblowers limits the effectiveness of the Lokpal in uncovering corruption. In comparison, Sweden has stringent whistleblower protection laws that safeguard the identities and safety of those who report corruption. This fosters a culture of transparency and encourages more people to report unethical practices, which in turn strengthens the Ombudsman's capacity to combat corruption.

India can learn valuable lessons from Sweden's model of the Parliamentary Ombudsman, which has proven to be an effective and trusted institution in combating corruption. To enhance the effectiveness of the Lokpal, India must implement several key reforms. First, the Lokpal's appointment process must be made more transparent and independent from political influence. Second, its jurisdiction should be expanded to include the judiciary, ensuring that all branches of government are subject to its oversight. Third, the Lokpal's investigative powers must be broadened to allow for independent, suo motu investigations, and it must be given the

autonomy to act without bureaucratic delays. Lastly, robust legal protections for whistleblowers must be introduced to encourage individuals to report corruption without fear of retribution.

The Lokpal has the potential to become a powerful anti-corruption body, but it requires comprehensive reforms to fulfill its mandate. By adopting best practices from Sweden's Parliamentary Ombudsman and tailoring them to India's unique political and social context, the Lokpal can become an institution capable of holding the powerful accountable and restoring public trust in governance. If these changes are implemented, the Lokpal will not only be more effective in combating corruption but will also contribute to building a more transparent, fair, and accountable system of governance in India. The road to reform may be challenging, but it is essential for ensuring that the Lokpal becomes the institution it was envisioned to be—a vigilant guardian of integrity in public life.

