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**JUDICIAL INNOVATION IN CUSTODIAL
SAFEGUARDS: A CRITICAL STUDY OF POST-BNSS
SUPREME COURT JURISPRUDENCE ON POLICE
CUSTODY AND INMATES' RIGHTS IN INDIA¹**

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Abstract

The protection of individuals in police custody continues to be one of the most important features of India's criminal justice administration in light of continuing custodial abuse and procedural violations. The Bharatiya Nagarik Suraksha Sanhita, 2023, has ushered in path-breaking amendments to the criminal procedure with a view to reinforcing efficiency without diluting the constitutional safeguards. The applicability of custodial rights, however, rests on judicial interpretation and enforcement. Against this backdrop, the Supreme Court of India has emerged as a critical actor in developing and streamlining custodial safeguards through imaginative jurisprudence.

The research paper critically examines the pronouncements of the Supreme Court of India in the post-BNSS era on police custody and inmates' rights. This study examines how the Court has interpreted the constitutional provisions, statutory safeguards, and human rights principles to respond to emerging challenges in custodial practices. A special emphasis is put on judicial innovations in regards to issues of arrest, preventive torture or illegal detention, availability of legal counsel, medical inspection, and gradually increasing standards of police accountability. Employing a doctrinal and analytical research methodology, it is examined in the paper to what extent protective measures relating to human dignity and liberty in police custody are made enhanced through post-B NSS judiciary interventions. Gaps between judicial interpretations and implementation at the grassroots level are also pointed out in this research study. In conclusion, it is hereby opined in this paper that besides making crucial interventions in

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enhancing protection standards within police custody through Supreme Court pronouncements, it is imperative to register legislative and implementation momentum to ensure that judicial innovations are translated into meaningful action to protect the rights of inmates within India.

Keywords: Custodial Care, Custodial Safeguards, Judicial Innovation, Supreme Court of India, BNSS 2023, Rights of Inmates, Custodial Violence, Constitutional Provisions

Introduction

Violence and abuse of authority within police custody have always posed a significant threat to the Indian criminal justice system. In spite of the constitutional guarantees of "life, liberty, and dignity" guaranteed through Articles 20, 21, and 22 of the Constitution of India, those in police custody remain vulnerable to unconstitutional imprisonment, duress, and infringements of human rights. This problem takes on even greater severity because those within custody are necessarily placed in circumstances of utter susceptibility, where the scale of disparity is hopelessly in favour of law enforcement authorities. Custodial guarantees do not merely represent procedural formalities, but in all probability, constitutional imperatives for the state. The commencement of the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS), which replaced the Code of Criminal Procedure, 1973, represents a paradigm change in the realm of criminal procedural law in India. Though BNSS represents a crucial step forward in the administration of criminal justice, increased efficiency, and less red tape, it has, however, raised several crucial questions regarding the treatment and safeguarding of prisoners' rights at the time of arrest, detention, and when they are in police custody. Within this developing scenario, the Supreme Court of India's jurisprudence has assumed utmost importance. The Supreme Court since the aftermath of the NSS decision has continued to play the role of the protector of the basic rights of citizens through the evolution of jurisprudence in relation to police accountability, custody dignity, and procedural justice. The court has had the mandate through the important decisions and guidelines to narrow the existing divergences between the law and the practical field. The element of judicial innovation has been seen in decisions related to arrest practices, legal representation, medical examination of arrestees, torture protection, and compensation.

In the given research, the impact of judicial innovation on custodial safeguards will be critically reviewed within the jurisprudence post-BNSS SC, addressing the nature and effect of judicial interventions in improving custodial safeguards. For analyzing judicial trends and the evolving

standards of human rights protection, the research aims to evaluate the effect of judicial interventions on improving accountability and human dignity in police custody. This study further delves into the difficulties that continue to arise in spite of judicial activism, as well as the imperative of having a harmonious approach between legislative measures and judicial monitoring in order to provide practical protection of custody rights in India.

Review of Literature

Dr. J. Lakshmi Charan, "Custodial Justice²: A Study on Police Brutality in India", This volume contains a doctrinal and constitutional critique with special focus upon the Supreme Court guidelines, particularly D.K. Basu vs. The State of West Bengal. The volume juxtaposes the provision under Article 21 along with the figures from the National Human Rights Commission regarding custodial deaths. The volume will allow tracing the judicial development regarding the provision for custodial security and will help test the implementation deficits within the post-2023 legal scenario.

Bharat Bhushan Pareek, Custodial Crimes and Violations of Torture, Rape, Fake Encounters, Death, and Violence in India³, This study accounts for custodial offenses through case studies of deaths, torture, rape, and fake encounters. It examines the Supreme Court decisions to compensate and provide remedial action in response to police excesses in a critical manner. The author also casts a skeptical eye on the deterrent effectiveness of judicial relief in the absence of institutional accountability. The above text is quite relevant to the research being carried out for the following reasons:

Dr. Syed Jaheeruddin & Shaik Mansur, Prisoner's Rights in India⁴, This book studies the increasing delineations of prisoners' and undertrials' rights in the wake of Article 21 by covering areas such as overcrowding in prisons and cases of police violence in custody. This source is relevant to my study as it relates to the impact of police custody on individuals in custody in India in the context of their rights in the Indian legal framework. This source supports my research in that it relates to 'judicial innovations' to be studied in the context of police custody cases in India based on their relevance to the topic of legal reforms in police custody cases in that jurisdiction.

² 1st edition (2024), pp. 250-300.

³ 1st edition (2025), pp. 150-220.

⁴ 1st ed. (2025), pp 180-250.

Joshua A. Aston, Torture Behind Bars: Role of the Police Force in India⁵, This volume presents an empirical and critical record of custodial torture through NHRC reports, NGO findings, and judicial records. It appraises Supreme Court directives like installation of CCTVs and arrest guidelines by underlining poor compliance and impunity. The author's critique goes a long way in assessing the limits of judicial activism. From the perspective of this research, the book offers historical continuity and assists in appraising the practical utility of Supreme Court safeguards up to the post-BNSS phase.

Kavita Singh, Criminal Justice System: An Evaluation⁶, This publication links the Indian jurisprudence on custody with international conventions such as the UN Convention Against Torture. The publication examines the Supreme Court judgments on cuffing, arrest, and magisterial presence during custody. The publication also judges the level of administrative responsibility within criminal justice administration. The publication is very useful for this research as far as determining whether the Indian Supreme Court judgments since the implementation of BNSS are consistent with international standards or not.

Statement of the Problem

Despite constitutional safeguards and long-standing judicial guidelines, custodial abuse and violations of inmates' rights continue to take place in police custody in India. The promulgation of the Bharatiya Nagarik Suraksha Sanhita, 2023, has brought in changes in procedure, but doubts persist about their actual impact on custodial safeguards. Whereas the Supreme Court has actively intervened through innovative interpretations and directions, gaps continue between judicial pronouncements and their effective implementation at the ground level. This presents a need to critically look at post-BNSS Supreme Court jurisprudence for an appraisal as to whether judicial innovation has meaningfully enhanced the protection of inmates' rights while in police custody.

Objectives of the Study

- To investigate the nature and extent of judicial innovations introduced by the SC to secure prisoners' rights during police custody in the post-BNSS era.
- Assess the extent to which post-BNSS Supreme Court jurisprudence has been able to apply a brakes to custodial abuse and reinforce constitutional safeguards in India.

⁵ 1st ed. (2020; reprint 2024), pp. 100–180, Oxford University Press.

⁶ 1st ed. (2024), pg. no. 200-280

Hypotheses Testing

- This has been extended further by the post-BNSS Supreme Court through innovative constitutional interpretation to safeguard the rights of the inmates when in police custody.
- It needs to be remembered that unless backed by effective enforcement mechanisms and institutional mechanisms for accountability, mere judicial directives cannot avoid custodial abuse.

Research Methodology

The paper draws upon a doctrinal and analytical research methodology, grounded essentially in the analysis of the constitutional provisions, statutory laws, and judgments pronounced by the Supreme Court after the coming into force of BNSS, 2023. It also relies on secondary sources, including books, legal journals, reports of statutory bodies, and policy documents to support the analysis. Judicial reasoning is critically appraised for its practical implications. Comparative references have also been made to the pre-BNSS jurisprudence for an appraisal of continuity and change in custodial safeguards.

Scope of the study

The ambit of the research is strictly limited to the examination of the BNSS aftermath Supreme Court case law regarding police custody and prisoners' rights. The research work is based upon the examination of custodial rights of suspects in the arrest, detention, and interrogation phases. The pre-BNSS case laws have merely been referred to, to the extent of familiarity, to gauge the quantum of judicial innovation.

Limitations of the Study

The present study is only confined to doctrinal discussions without any empirical research in the fields or any sort of interview with jail authorities as well as with convicts. The study is based on Supreme Court decisions as reported, which may not entirely be true in practical implementation at grass-root levels. The present research does not conduct any sort of state-wise or international comparative study. Further, due to the relatively recent passage of BNSS legislation, extensive judicial information after BNSS is not readily available.

Legal Framework

The focus of the research paper is on judicial innovation in the realm of custodial protections through the evaluation of a wide range of constitutional provisions, legal statutes, and significant judicial opinions that together frame the governing principles of police custody and the rights of in-mates within the borders of India. Legal safeguarding under the provisions of the Indian Constitution-under Articles 20(3), 21, 22, and 32-provides the basic protection against the grounds of arbitrary arrest, self-incrimination, and maltreatment in custody. The other existing set of legal statutes includes "Bharatiya Nagarik Suraksha Sanhita, 2023," "Bharatiya Nyaya Sanhita, 2023," "The Indian Evidence Act," and the "laws of the Prisons" that regulate the procedural and substantive aspects of custody. There have been seminal decisions of the Supreme Court which have influenced the law of custody.

A. Constitutional Provisions

Article 20(3) Protection against Self-Incrimination: Article 20(3) guards the accused from being compelled to give evidence against oneself, and this directly restricts coercive police interrogation methods. This protection in police custody ensures that confessions or statements elicited with the use of force, pressure, or torture do not have any constitutional validity. It puts a check on investigative techniques that depend on physical and mental abuse. Thus, Article 20(3) acts as one important constitutional shield against custodial torture and forcible confession. Article 21- Right to Life and Personal Liberty Article 21 ensures that no person shall be deprived of life or personal liberty except in accordance with a just, fair and reasonable procedure established by law. By judicial interpretation, this right has been extended to cover protection against custodial violence, inhuman treatment, and degrading detention conditions. It takes into consideration the fact that even the right of an individual to live with dignity and in a humane manner persists even when he is in police custody. Hence, Article 21 is the constitutional basis for all custodial safeguards.

Article 22(1) & (2) Safeguards against Arbitrary Arrest and Detention: Article 22(1) guarantees that a person who is arrested should be informed of the grounds for such arrest and also has the right to consult a legal practitioner of his choice. Article 22(2) requires production before a magistrate within twenty-four hours to avoid illegal or lengthy detention. These are, thus, procedural checks on police power while the person is in custody. They have a direct link with custodial safeguards because they minimize the possibility of abuse in the beginning and most fragile period of custody.

Article 32 – Constitutional Remedies Article 32 grants the power to a citizen to approach the Supreme Court directly for enforcement of fundamental rights. Judicial intervention in cases of custodial violence, illegal detention, and abuse of power is facilitated by the provision. The Supreme Court has made use of Article 32 to award compensation and issue guidelines for custodial protection. Therefore, Article 32 serves as an effective remedial mechanism to ensure that custodial safeguards are not merely theoretical but are enforceable in practice.

B. Statutory Laws

Bharatiya Nagarik Suraksha Sanhita, 2023 : BNSS, 2023, which was enacted on 25 December 2023 and would become effective from 1 July 2024, represents a new procedural law for arrest and custody and repeals the earlier provisions under CrPC. Arrest procedures are governed by sections 35-48; reasonable grounds to be mandatorily communicated within three hours, Sec. 36; video-audio recording of arrest, Sec. 105; and production before a magistrate, Sec. 47, within 24 hours. The law has introduced zero FIRs, Sec. 173, and forensic protocols for serious offences. Further, these provisions enhance the rights of inmates under Article 21, building from the standards established in *D.K. Basu v. State of West Bengal*, though challenges in implementation remain.

Indian Penal Code, 1860 (Bharatiya Nyaya Sanhita, 2023–custodial offences): The newly codified Bharatiya Nyaya Sanhita, 2023, covers offenses by public servants, including police officials, through sections like Sec. 76 regarding disobedience causing death, Sec. 115(2) on grievous hurt by a public servant, Sec. 118(2) on death caused by a public servant, and Sec. 109 regarding attempted murder. It expands definitions of organized crime and terrorism, while attempting to rein in custodial abuse. The aforesaid provisions directly pertain to custodial safeguards, as brutality is prevented and the protections under Article 21 are complemented, more so when interpreted in relation to the Supreme Court jurisprudence that had articulated gaps in the earlier IPC (Sec. 330–331). **Indian Evidence Act, 1872 (Bharatiya Sakshya Adhinyam, 2023 – confessions and custody)** The admissibility of confession under the Bharatiya Sakshya Adhinyam, 2023, is still restricted regarding any statement made to a police officer with a threat, coercion, or torture on the accused (Sec. 22–23). The electronic evidence in police custody is also excluded (Sec. 24–27), and statements shall be video-recorded in front of magistrates in order to address any reliability concerns. These precautions-which prevent the making of

forced confessions-directly support the rights of jail inmates and are in line with provisions laid down in the cases of *Joginder Kumar v. State of U.P.* and *Arnesh Kumar v. State of Bihar*, although their effectiveness depends on rigorous judicial enforcement.

Police Acts & State Police Manuals: Its basic structure is provided by the Police Act of 1861, while details are added through state-specific rules and handbooks. For instance, MP Police Regulations, 1951, explain how lock-ups should be conducted, how arrest information is documented, and even who should be recorded as a visitor. The manuals interspersed instructions issued in *D.K. Basu* and other Supreme Court rulings for the introduction of medical checks, custody memos, and CCTV cameras in places of custody. These custodial guidelines have to be implemented on the ground; however, implementation falls under enforcement by different states. It exposes both central and state-level non-compliances with protection for detainees.

Prison Acts and Prison Rules: The Prisons Act of 1894, as updated with state amendments, the Model Prison Manual 2016, among other Prison Acts, prescribes the condition of persons who have been committed to judicial custody following police custody. They lay down provisions for separation, health checks (Section 39), legal aid (Rule 12), and the transfer of prisoners under the Transfer of Prisoners Act, 1950. These statutes enrich Article 21 on humane treatment and legal rights while setbacks such as overcrowding and delays for those standing trial, pending resolution, as discussed in *Sunil Batra v. Delhi Administration*, demand constant judicial vigilance and reform.

C. Key Supreme Court Cases

D.K. Basu v. State of West Bengal⁷: This landmark case, decided on December 18, 1996, addressed the widespread instances of abuse and custodial death. In this, the Court established the following 11 non-negotiable guidelines in relation to arrestations and detentions: issuing a written statement of the reasons for the arrest, enabling the release of notice to the family, periodic health checks, as well as the maintenance of a detailed arrest register. Non-compliance is made enforceable, which may result in contempt of court. This case is the primary foundation under Article 21.

⁷ (1997) 1 SCC 416.

Joginder Kumar vs. State of U.P.⁸: The Court imposed further limitations on random arrests under Section 41 CrPC on April 29, 1994, necessitating that arrests be made on the suspicion of wrongdoing. The arresting authorities must inform the detained, as well as a family member or friend, the reason for an arrest, and produce the arrested individual in front of a magistrate within 24 hours. These orders improved police accountability and later fixed the procedural aspects in BNSS.

Nilabati Behera vs State of Orissa: In the case of State of Haryana vs. Kuldeep Singh in March 1993, the Supreme Court held the State liable in the custodial death of Suman Lal Behera and awarded compensation to his mother. The decision found the suicide defense to be untenable on account of the inconsistencies in the evidence and reiterated the strict duty of the State to protect the provision of the right to life under Article 21. In effect, it brought the concept of the 'Constitutional Tort' in India and the use of compensation as a public law remedy to discourage instances of custodial violence. However, in the same year, the Court breathed life into the disciplinary proceeding in

Rudul Sah v. State of Bihar⁹: decided in the august of 1983, this case involved the illegal detention of 14 years following an acquittal. The Supreme Court granted the interim compensation with an expansion of the scope of article 21 relating to the right against the illegal detentions. This case of article 32 was invoked with the aim of providing direct relief that could be sought without filing the suit of the civil case, setting the precedent that the state was liable for the rights that were violated.

Arnesh Kumar v. State of Bihar¹⁰: On July 2, 2014, it has been held by the Supreme Court that automatic arrests in cases under Section 498A IPC should not occur. There must be satisfaction from the magistrates that an offense is punishable with a jail term of up to seven years. Notices under Section 41A CrPC should be issued with sound reasons in favor of arrests and proper police training to avoid harassment demands to be addressed in all aspects by this ruling.

Regarding: CCTV Cameras in Police Stations (Paramvir Singh Saini v. Baljit Singh &

⁸ (1994) 4 SCC 260

⁹ (1983) 4 SCC 141

¹⁰ (2014) 8 SCC 273

Ors., 2021 onwards) Since 2020, under this and subsequent orders, the Supreme Court made it compulsory to have audio-video recording in all police stations, lock-ups, and interrogation rooms through the use of CCTV cameras. Committees were also formed to check its implementation, after which the recording was to be held for a period of 18-24 months and then sent to the NHRC for monitoring. The use of technology in this way has increased transparency and accountability and has prevented torture in lock-ups, a significant step in protecting the rights of prisoners in the modern age.

Analysis and Discussion

The data that is apparent is that, following on from the BNSS, the jurisprudence on the Supreme Court is continuing with its stress on protection of dignity and liberty during police custody. It is worth mentioning that the discourse also focuses on the existing gap between the standards of the judiciary and their implementation by law enforcement agencies. Despite the improvement of the judiciary in developing normative standards, there is a limitation in their effectiveness.

Findings

Findings of the study indicate that the proactive role of the Supreme Court has continued to enhance the safeguards within the custodial framework despite the introduction of BNSS, 2023. The interpretation of the courts has led to the widening of the constitution to respond to the changing scenarios within the custodial framework. Despite the relationship between the custodial violations and the lack of effective sanctions, the violations still continue. The study demonstrates that the changes within the constitution are not effective without the control of the courts.

Suggestions / Recommendations

- The incorporation of the guidelines of the Supreme Court in the framework of the BNSS should be made crystal clear through legislation.
- There is a need for strengthening independent monitoring mechanisms to monitor the custody practices in the police stations.
- Regular training sessions on the right to detention and the duties as per the constitution should also be made mandatory for the police force.

- A judicial direction concerning accountability and compensation must be accompanied by timing for its enforcement.
- There should be more emphasis on the use of technology and documentation in order to increase transparency in police custody.

Conclusion

The issue of custodial protections remains an important one in the Indian justice system despite constitutional protections and procedural improvements. It has been seen that the post-B NSS era has upheld the Supreme Court's important role in protecting the rights of inmates through novel and rights-based jurisprudence. Judicial activism has contributed to improving the enabling environment of police custody through police procedures. However, the failure of implementation has marred the effectiveness of these protective components. It has been found that improving the rights of inmates in police custody calls for an equalization of legislation, judiciary, and administration. Only a collective effort can allow the potential of dignity, freedom, and justice to be attained in police custody.

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