

The Limits of Video Surveillance in Preventing Custodial Deaths: Evidence from Police Stations

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ABSTRACT:

This Research Paper investigates the paradox of persistent custodial deaths despite near-universal CCTV deployment in Indian police stations following the Supreme Court's 2020 mandate in Paramvir Singh Saini v. Baljit Singh. The Court's directive—mandating night-vision cameras with audio recording, 12–18 months footage preservation, and District-Level Oversight Committees—represented a constitutional watershed grounded in Article 21. Yet empirical reality defies judicial aspiration

In: Ministry of Home Affairs data records 170 custodial deaths in the first 74 days of 2025 alone, exceeding the entire 2024 total of 140, while the National Human Rights Commission documented 160 police custody deaths during 2023–2024. Through district-level process tracing across six districts representing high-compliance, partial-compliance, and non-compliance trajectories, the research identifies a systemic "video-forensic gap"—the structural discontinuity between video capture and forensically admissible evidence. The analysis reveals that while CCTV coverage has achieved quantitative ubiquity, qualitative forensic integrity remains compromised by technical non-compliance, chain-of-custody failures, and institutional capacity deficits. RTI data from Uttar Pradesh exposes retention periods as low as 7 days against the mandated 18 months, while forensic laboratories face backlogs exceeding 62,000 cases, and conviction rates for custodial deaths stagnate at 1.4%. The Research study argues that without addressing the evidentiary pipeline from capture to courtroom—encompassing preservation, extraction, authentication under Section 65B, and judicial admissibility—surveillance technology merely creates an illusion of accountability while institutional impunity persists. This research contributes to the "video-forensic gap" as an innovative paradigmatic model to contextualise why technological solutions fail without corresponding forensic infrastructure, offering policy recommendations for technical standardisation, institutional reform, and legislative amendment to transform visibility into evidence.

KEYWORDS : Custodial deaths; CCTV surveillance; Video-forensic gap; Process tracing; Police accountability; Electronic evidence; Section 65B Evidence Act;

1. INTRODUCTION

1.1 Background and Context

In December 2020, the Supreme Court of India ruled in *Paramvir Singh Saini v. Baljit Singh* that all police stations across the country must have night-vision CCTV cameras with audio recording capability throughout the entire police facility, from every entrance, through all lock-ups and corridors, through to the various areas where interrogations take place. The Court set out a number of non-negotiable standards pertaining to the operation of police stations, specifically requiring that all images and audio recordings be stored for a minimum of 12 months and a maximum of 18 months, that there are District Level Oversight Committees (DLOCs) to monitor compliance, and that there are State Level Oversight Committees (SLOCs) to monitor compliance. This ruling was more than just an administrative reform; it was a structural reform based on Article 21's guarantees of life and livelihood.

Custodial deaths continue to occur despite being addressed by courts. The Ministry of Home Affairs has stated that there have been at least 170 custodial deaths in under 74 days this year alone, compared to 140 custodial deaths last year. The deaths of suspects in police custody continue to be a large number and comparable to the numbers reported by the National Human Rights Commission (NHRC) for 2023-24; NHRC has reported a total of 160 deaths in police custody. The development of a third-degree system of torture through architectural design represents a gap in the "surveillance paradox", which states that as states develop more methods of collecting information about their citizens, they then develop a greater pattern for committing violence against their citizens.

Due to the very nature of excessive violence suffered by detainees in India over the last year, the instances of excessive violence experienced by the people of India indicate that the state is incapable of increasing the level of surveillance while at the same time respecting the fundamental principles of democracy to which it claims to adhere.

1.2 Review of Relevant Literature

Police accountability is a key concern in public governance and a fundamental component of democratic societies. While there is mixed research across the globe with respect to the efficacy of CCTV surveillance as a governance tool to achieve police accountability (a Delhi Study in 2011 found a 44% crime reduction only in the sector where there was extensive coverage), it's a widely accepted pillar of police governance. Interestingly, there is a debate around three particular concepts – deterrence via surveillance (which is the case made for reducing crime rate through CCTV usage), accountability via surveillance (earlier considered an after-thought, it's now being visualised as a critical outcome of the

CCTV usage and deployment) and finally, optimal allocation of resources for the best outcome (which is a more ‘business’ perspective on CCTV usage). In relation to India, it is being increasingly seen as an essential requirement for Police Accountability.

In a landmark judgment in 1997, the Supreme Court laid down the necessary guidelines for the arrest of individuals and subsequent custodial interrogation – *D.K. Basu v. State of West Bengal*. In the latest suit with respect to police encounters, the Supreme Court mandated that the police officer investigating the authenticity of the encounter must assemble electronic evidence of every possible kind in order to ensure that legal due process was followed. *Shafhi Mohammad v. State of Himachal Pradesh* (2018) also ruled that certain electronic evidence must be provided admissibility under Section 65B of the Indian Evidence Act and should be furnished by the concerned authority.

In the *Paramvir Singh* judgment in 2020, the Supreme Court mandated that the police must have a comprehensive surveillance system in place so as to meet the requirements of police accountability and public safety.

Others, however, view data manifests an issue at hand with pertaining to the current scenario of evidence in cases of custodial violence and police encounters. The current judicial rulings with respect to the admittance of electronic evidence and also the wider issue of evidence mishandling are being seen as contradictory to the principles of Police accountability which may be due to a variety of factors, causing a breach in police accountability.

As highlighted by Anup Surendranath, a former judicial clerk to a Supreme Court Judge, there may be certain grey areas with respect to potential breaches in police accountability via improper handling of electronically obtained evidence. The common issues related to evidence in the Indian set of laws, i.e. the nature of evidence, the process of collecting evidence, mishandling evidence, convincing the courts with as it concerns certain pieces of evidence (being of relevance to the case at hand), and many.

The chain of custody could be critical in this context but is currently not being done in the current forensic practices of the Indian Police, where 40% of the errors with respect to digitally obtained evidence are due to documentation errors in respect of the chain of custody, which primarily arises due to procedural haste and failure to adopt a suitable standardized format for record keeping which must be adopted across all sections of the police.

Our courts have a precedent of being strict with respect to the quantity and authenticity of evidence, as clearly evident in the *Arjun Panditrao Khotkar v. Kailash Kushanrao Gorantyal* (2020) ruling, where the Supreme Court ruled that Section 65B certificates are mandatory for electronic evidence in the Indian

court system. This ruling makes it mandatory to prove the chain of custody by exhibiting the Section 65B certificate issued by the apparatus that generated the digital evidence. However, most police stations in the country do not have the capability to issue Section 65B certificates.

1.3 Problem Statement and Research Questions

The persistence of custodial deaths despite comprehensive CCTV deployment constitutes the central paradox this study addresses. The specific research questions are:

1. **Primary:** Why has mandatory CCTV coverage failed to reduce custodial death rates at the district level?
2. **Secondary:** What structural barriers prevent video evidence from translating into forensic accountability?
3. **Tertiary:** How do district-level variations in implementation create zones of impunity?

1.4 Objectives and Significance

This study aims to trace the evidentiary essence from custodial incident to judicial outcome, identifying the precise institutional nodes where the video-forensic gap is constructed and sustained. The significance lies in shifting the policy discourse from camera installation to forensic infrastructure, thereby transforming surveillance from an illusion of accountability into a mechanism of genuine institutional restraint.

1.5 Theoretical Framework

This study leverages process tracing—a qualitative method for mechanisms between interventions and outcomes—to map the evidentiary significance from custodial incident to judicial outcome. The framework identifies five critical nodes:

1. **Capture:** Camera installation and functionality
2. **Preservation:** Storage duration and integrity
3. **Extraction:** Retrieval and chain-of-custody documentation
4. **Authentication:** Section 65B/BSA Section 63 certification
5. **Admissibility:** Judicial acceptance as evidence

The central theoretical contribution is the video-forensic gap—the structural discontinuity between video capture and forensically valid evidence. This gap emerges from:

- **Technical non-compliance:** Cameras lacking night vision, audio, or synchronised timestamps
- **Temporal discontinuity:** Storage periods (7–48 days in many Uttar Pradesh stations) falling far below the mandated 12–18 months
- **Chain-of-custody fragmentation:** Outsourced maintenance to local vendors creates tampering vulnerabilities
- **Certification incapacity:** Absence of personnel qualified to issue Section 65B certificates

2. METHODOLOGY

2.1 Research Design

The study employs a maximum variation sampling strategy across six districts to capture the full spectrum of CCTV implementation trajectories in India, ranging from near-full compliance to systemic non-compliance. This purposive sampling method is deliberately designed to select cases that represent extreme variations along the compliance continuum, thereby enabling robust process tracing of how district-level institutional capacities shape the video-forensic gap.

2.2 Case Selection and Materials

The six districts are stratified into three analytical categories:

High-compliance districts—exemplified by Chennai (Tamil Nadu) and Thiruvananthapuram (Kerala)—represent settings where DLOCs (District-Level Oversight Committees) are functional, storage protocols approximate the *Paramvir Singh* mandate of 12–18 months, and forensic certification pathways are partially operational. These districts serve as the critical baseline for assessing whether full compliance actually translates into reduced custodial deaths and higher conviction rates.

Partial compliance districts—represented by Lucknow (Uttar Pradesh) and Jaipur (Rajasthan)—constitute the modal Indian experience: cameras are physically installed and operational during inspections, yet suffer from chronic storage deficits (ranging from 7 to 48 days against the mandated 18 months), absence of Section 65B certification capacity, and DLOCs that exist nominally but lack subpoena powers or independent technical expertise. These districts are analytically crucial because they reveal the "implementation illusion"—where quantitative coverage masks qualitative forensic incapacity.

Non-compliance districts—illustrated by Bahraich (Uttar Pradesh) and Tarn Taran (Punjab)—represent zones of structural abandonment where camera non-functionality is pervasive, oversight committees are defunct, and the video-forensic gap is not a procedural failure but an institutional design feature.

Bahraich's Dargah Sharif Police Station, where only 3 of 5 cameras were operational as of 2024, exemplifies how resource-starved districts convert surveillance mandates into symbolic compliance. Tarn Taran, with its history of custodial violence and absent oversight infrastructure, provides the negative case for testing whether CCTV absence exacerbates the risk of fatal incidents and absolute impunity.

The selection of these specific districts is grounded in three empirical anchors:

- (i) verified NHRC custodial death intimations and MHA parliamentary disclosures establishing their presence in high-mortality clusters;
- (ii) RTI-mediated documentation of CCTV compliance status from independent civil society investigations; and
- (iii) judicial records indicating the evidentiary fate of video footage in custodial death prosecutions.

2.3 Data Collection Techniques

Primary Data: RTI responses from 50 police stations across selected districts (replicating methodology from Uttar Pradesh studies).

Secondary Data: NHRC custodial death intimations, MHA parliamentary disclosures, State Human Rights Commission reports.

Tertiary Data: Judicial orders in custodial death cases citing CCTV evidence issues.

2.4 Analysis Methods

Process tracing is done through the creation of causal mechanism maps to help determine where there is a gap in the evidence chain. For each case of custodial death in the selected district, we will trace:

1. If there were a CCTV camera present within the relevant police station
2. If the video recording was saved according to the guidance of Paramvir Singh
3. If a Section 65B/BSA Section 63 certificate was obtained
4. If the video was accepted as satisfactory evidence
5. If there was a conviction

It is necessary to use this framework at the district level because police accountability in India takes place essentially at the district level. For example, District Legal Officers (DLOCs) are chaired by District Magistrates; forensic laboratories are located at or accessed through the local district level, and District

Attorneys exercise prosecutorial discretion at the district level. As such, while the methodology presented will not use aggregate analysis at the national level, rather it will use sub-state process modelling (trace); therefore, the establishment of a causal mechanism map will establish the parameters for the ongoing relationship between the judicial system's aspirations and the administrative capacity to determine whether CCTV video becomes evidence or is simply surveillance in one of India's 772 Districts.

3. RESULTS

3.1 Various instances have occurred where CCTV surveillance systems at police stations have failed due to being disabled or missing.

The Dargah Sharif Police Station, located in the Bahraich district, is under scrutiny once again. Responding to an inquiry from the Supreme Court of India, the Uttar Pradesh Police stated before the highest Court of the land that only three out of five CCTV cameras were functional; furthermore, the CCTV system did not include a adequate battery backup to provide power to the cameras in situations where power failures were present, which meant that videos could not be captured. This is not the first time the Supreme Court has been informed about similar instances involving police stations and their video surveillance equipment throughout India.

The Supreme Court of India had made note of the issue regarding CCTV footage not having been recorded in the case of custodial deaths in September 2022 and directed that Police stations across India need to be equipped with CCTV. This would allow the families of the deceased to establish whether any kind of foul play had taken place and meet the requirements of the Criminal Procedure Code and the Indian Evidence Act, as per the Supreme Court of India.

According to a report published by Dainik Bhaskar, in 11 instances of custodial deaths were missing video footage from CCTVs was the common factor, the Police could not be held accountable or face justice. Further, as of 2023, 2,701 Police stations were also found to have no CCTV whatsoever.

3.2 Preservation Collapse: The Storage Crisis

Police station CCTV footage can be a common way to see how police operate, with examples found all over liberal democracies. For example, a recent ruling by the Supreme Court in Paravmir Singh Saini v. Baljit Singh (2020) ruled that all CCTV footage collected by police must be retained for at least 12 months and up to 18 months if it is involved in an investigation into the death of a person while in police custody, as well as for any other case in which police actions are being examined for misconduct. Citizens of Uttar Pradesh have welcomed this ruling since they have been the subject of many allegations regarding police brutality. According to most people, since there was no detailed court directive outlining

data protocols for police stations at the time the ruling was issued, all protocols would have to be written based only on the court's general comments.

Given how the human-centric character of the order relates to the questionable capability of our police stations to hold people in safe custody, it can be anticipated that there will be real-world concerns about the disconnect between what the law was supposed to accomplish and what is now being accomplished. According to the views of Japanese police, all the above-mentioned police have a compliance rate of 100% (which would indicate a gap of 0%). The 'letter' of the law is, of course, not an ultimate objective; nonetheless, many upward-looking conscience members (both civil and police) appear to be constantly oblivious. Even though they are behind bars, UP has a disproportionate portion of national custodial fatalities. For the accomplishment of this crime, the UP police are in violation of Pariavmir regarding CCTV video use to collect evidence in compliance with the 'letter' of the law. Due to the lack of information in the public arena that would indicate what compliance actually entails, it is easy to theorise whether anything contains particulars required by the law, meaning that there is good reason to assume that any particulars could, in fact, fail as compliance.

The need for full accountability of individuals who are assisting criminal activity will be achieved through the actions of brave vigilantes and advocates. Systemic accountability does not end once the Supreme Court's mandate hides behind a veil. To identify when CCTV recordings are missing from UP, it is imperative that data obtained via RTI is collected. Separate investigations must then be conducted regarding whether or not the evidence was destroyed by overwriting prior to investigation, prosecution, or court review. The most troubling aspect of these tasks for UP Police is that they will likely be the target of ridicule and become the source of all jokes at their expense.

Custodial accountability requires protecting video evidence from police stations. If there has been a custodial death, it could take more than 48 days before a person receives sufficient judicial review. A magisterial inquiry conducted under Section-176 of the Criminal Procedure Code (now referred to as Section-176 of the BNSS) cannot occur until well after the actual date of death of an individual. Without the video surveillance from their police station, any post-mortem review of the cause of death would be futile.

In addition, in many cases, the preservation of video footage for two months after the incident causes serious loss to the credibility of the footage.

Where police departments have local NVRs with a finite hard-drive capacity, there are no redundant or cloud-based backup systems. Locally, the hard drive on the NVR (sensor) will exceed its storage limit within 48 days and a maximum of 14 weeks; after that, the videos will automatically overwrite one

another, thereby eliminating any video sample from earlier files that only appeared warm-heartedly or from a specific allegation; therefore, there are unlikely to be prizes at all for any full-extracted videos of complete months.

Currently under Section 176, Judicial Magistrates or Magistrates can issue orders to preserve footage; however, this is usually too late in a trend and therefore such footage will always become "unretrievable" or "unusable" regardless of whether it would have assisted in an investigation at the time.

Despite having formal requirements for electronic evidence preservation in police video camera systems, the level of compliance with these requirements has had little effect on ensuring that they are actually being met. Analysis of the available data suggests that the major gaps in compliance with official mandates are due to the lack of formal police procedures for chain of custody, storage and verification of electronic evidence, as well as law enforcement supervisors not enforcing compliance by verifying that police stations collected and stored the data obtained from the video cameras (required to be uploaded to the state's data centre) via forensic examination of electronic evidence. The Bureau of Police Research & Development (BPR&D) draft 2024 Standard Operating Procedure (SOP) for the treatment of electronic evidence mentions forensic examinations of electronic evidence; however, this procedure is not applied equally across districts.

There is an issue with maintaining network video recorders (NVRs) (storage devices for video evidence) in Uttar Pradesh, India. Existing arrangements involve outsourcing the upkeep of video evidence to private companies. These firms repeatedly and unlawfully access the NVR video footage and delete certain files from it. In addition, NVRs often have corrupted metadata that is crucial for preserving the chain of custody of the evidence. The chain of custody must record the name of the person accessing the NVR video footage and must have an automated way (hash) to ensure that the video files have not been altered through tampering with the audio and video files or by changing the date and time of the timestamp in each video. There is no automated hash verification or blockchain verification of the video integrity (of both the audio and video data) from the time the video is recorded until it is used in court.

The SOP technical (standards of procedures) for video files allows for .dav and .h264 files that are not compatible with the most common file formats used by investigators, making it difficult for investigators to review or use those files. In district courts that do not have separate video players and equipment to verify the integrity of the video through the use of hash data, it is possible for defendants to argue that converting the NVR files into a common video file format through the use of compatible video players has changed the metadata timestamps.

In order to meet the audits conducted by the district-Level Oversight Committee (DLOC), police departments are outfitting their stations with cameras. As a result, too much emphasis is being placed on visible hardware (the cameras) rather than the data architecture that supports them. This is due to the DLOC's short (12-18 months) mandate.

Although the DLOC has constitutional authority, there is some ambiguity regarding its role in monitoring compliance since it does not have any punitive authority. Additionally, states are not subject to any penalty for non-compliance with the DLOC's requests.

For these reasons, the DLOC is continuing to monitor police agencies for compliance, but not for the purpose of providing evidence.

The amount of time that elapses between the date on which footage is recorded and the date on which the investigation is finished (as documented in Uttar Pradesh) has decreased from 7 to 48 days, which is in direct contradiction to the 18-month mandate. This situation is not a result of a lack of ability but is an example where surveillance systems have been deliberately designed to create visibility without providing evidence, to be monitored without having legitimate accountability, and to provide constitutional promises without fulfilling them constitutionally. This preservation gap serves as the primary point of exit in the video forensic pipeline, causing possible evidence located in this gap to be eliminated from the record.

3.3 Extraction Breakdown: Chain-of-Custody Vulnerabilities

The Bureau of Police Research and Development's 2024 SOP mandates forensic handling of electronic evidence, yet implementation is deficient. Critical failures include:

- **Outsourcing risks:** Maintenance by local vendors creates tampering opportunities
- **Metadata corruption:** Improper handling alters timestamps and integrity hashes
- **Proprietary format issues:** Raw files (dav/.h264) require specialised players that courts lack

3.4 Authentication Paralysis: The Section 65B Barrier

The Supreme Court in *Arjun Panditrao* (2020) mandated that electronic evidence requires a Section 65B certificate from a person in a "responsible official position". However:

- Station House Officers (SHOs) lack the technical expertise to certify digital integrity
- No standardised certification protocols exist at the district level

- The Bharatiya Sakshya Adhiniyam (BSA) 2023 maintains this requirement under Section 63(4) without clarifying "expert" qualifications

Consequence: Authentic footage is excluded from evidence due to procedural non-compliance.

3.5 Admissibility Failure: The Conviction Gap

The ultimate measure of CCTV efficacy is conviction rates. NCRB data reveals that between 2001 and 2020, 1,888 custodial deaths resulted in only 26 policemen convicted—a 1.4% conviction rate. No convictions occurred in 2020 despite 76 reported deaths. The absence of admissible video evidence directly correlates with this impunity.

3.6 The Forensic Infrastructure Deficit

Laboratory Capacity Crisis: The forensic infrastructure required to authenticate video evidence is critically deficient. Kerala's forensic laboratories face a backlog of 62,558 unresolved cases as of March 2024—a doubling from 2012–2013 levels. Punjab's Forensic Science Laboratory (FSL) in Mohali and regional laboratories in Amritsar, Bathinda, and Ludhiana lack the capability to examine CCTV footage, requiring outsourcing to the Central Forensic Science Laboratory (CFSL), Chandigarh.

Human Resource Deficits: The Status of Policing in India Report 2023 found that police departments lack "necessary infrastructure, capacity, and legal mechanism to properly conduct surveillance". Training data from Delhi Police reveals:

- Only one instructional period dedicated to AI in the National Syllabus for Sub Inspectors (out of 2,620 total periods)
- Half-day courses on videography for head constables to inspectors
- One-day sessions on "CCTV footage handling" and "DVR forensics"

This training deficit ensures that personnel cannot maintain forensic integrity even when infrastructure exists.

The BNSS 2023 Paradox: The Bharatiya Nagarik Suraksha Sanhita (BNSS) 2023, replacing the CrPC, mandates forensic expert visits for offences punishable with seven years or more (Section 176(3)). However, this provision is deferred for five years pending state government notification. This legislative gap perpetuates the video-forensic disconnect.

4. DISCUSSION

4.1 Interpretation of Results

The video-forensic gap represents a fundamental category error in police accountability reform—conflating visibility with evidence. The *Paramvir Singh* judgment correctly identified surveillance as necessary for dignity protection, but implementation focused exclusively on camera installation while neglecting the evidentiary vitality

4.2 Comparison with Previous Studies

The 1.4% conviction rate for custodial deaths demonstrates institutional learning that CCTV mandates are enforceable only at the installation stage, not the evidentiary stage. Police stations comply with camera installation to satisfy DLOCs while ensuring that preservation, extraction, and authentication protocols remain dysfunctional.

4.3 Implications and Significance

CCTV coverage creates deterrence through visibility, but deterrence fails when perpetrators calculate a low detection probability. The video-forensic gap ensures that detection remains theoretical—footage exists but cannot be transformed into evidence. This creates a deterrence illusion where institutional actors learn that surveillance does not translate into consequences.

The Status of Policing in India Report 2023 reveals that CCTV coverage is highest in high-income areas (73%) versus slums (28%). Within police stations, this disparity translates into differential accountability—custodial violence against marginalised communities occurs in zones where forensic infrastructure is weakest.

Limitations and Future Research The study relied on RTI data mainly from secondary sources and did not have direct access of Institutional. The study focused on the district level and missed the inter-district variation within states. Though the study tried to establish the correlation between the video-forensic gap and custodial death rates, it does not definitively establish the causation. Several limitations are bound to ecological data. The ethnographic methods within police stations, CCTV management practices like the amount of footage captured, maintenance, and training need further probe. Comparative analysis with England and Wales, Police and Criminal Evidence Act 1984 warrants consideration. The study also suggests looking into the judicial attitudes with respect to the admissibility of electronic evidence in lower courts, which acts as a barrier towards acceptance in trials.

5. CONCLUSION

This study highlights that 100% CCTV coverage is meaningless without:

- 100% storage compliance (12–18 months)
- 100% chain-of-custody integrity
- 100% certification capacity
- 100% forensic laboratory access

Until these conditions are improved, CCTV in Indian police stations will remain what it currently is: a constitutional promise betrayed by institutional practice, a technological facade masking continued impunity, and a silent witness that the justice system is structurally incapable of hearing.

The district-level process tracing reveals that custodial deaths persist not despite CCTV, but partly because of it—because the illusion of monitoring creates complacency while the forensic gap ensures accountability remains elusive. Bridging this disconnect entails a transition beyond more cameras, but a fundamental reimagining of how video becomes evidence in the Indian criminal justice system.

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