

Examining Police Accountability in FIR Registration: An Analytical, PRISMA-ScR-Guided Review of Law, Practice and Comparative Evidence

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Abstract

Background: The First Information Report (FIR) is the legal gateway to criminal justice in India. Although the Supreme Court has held that registration is mandatory whenever information discloses a cognizable offence, refusal, delay and dilution of complaints remain a recurrent finding in official, civil-society and scholarly reports. **Objective:** This study examines how, and why, accountability for FIR registration succeeds or fails, and what comparative evidence suggests about remedies. **Methods:** A scoping review guided by the PRISMA-ScR reporting standard was combined with doctrinal legal analysis, comparative institutional analysis and descriptive analysis of National Crime Records Bureau indicators for 2020 to 2022. Only sources published on or before 31 December 2024 were eligible. A supplied list of 117 candidate references was screened alongside purposively identified statutes, judgments, commission reports and peer-reviewed studies; 89 sources were finally synthesised. **Results:** Five recurrent mechanisms explain non-registration: statistical incentives to suppress recorded crime, workload and capacity strain, discretionary police culture, political and social-status filtering, and weak, remote or non-binding oversight. Comparative evidence from England and Wales, Northern Ireland, South Africa, Kenya and Pakistan shows that independent, resourced and publicly visible oversight bodies, combined with external audit of crime recording, are associated with more credible accountability than internal supervision alone. **Conclusions:** FIR non-registration is best understood as an accountability gap rather than an isolated lapse of individual duty. The paper proposes a five-gap framework and five testable propositions, and recommends audit-based indicators, protected e-FIR channels, time-bound magisterial and supervisory review, and independent complaints bodies with enforceable powers.

Keywords: police accountability; First Information Report; FIR registration; zero FIR; crime recording; procedural justice; police oversight; India

1. Introduction

The First Information Report (FIR) is the first formal record through which the Indian state acknowledges that a cognizable offence may have occurred. Under section 154 of the Code of Criminal Procedure, 1973 (CrPC), the officer in charge of a police station must reduce to writing information disclosing a cognizable offence, and the informant is entitled to a copy free of cost [1]. Registration triggers statutory investigative powers, starts the evidentiary clock, enables timely medico-legal documentation and, for the complainant, converts a private grievance into a public legal event. Where registration is refused, delayed, diluted or diverted, the criminal process effectively does not begin. The FIR is therefore better understood as a gateway right than as a clerical formality.

The law on this point is not ambiguous. A Constitution Bench of the Supreme Court held in *Lalita Kumari v. Government of Uttar Pradesh* that registration is mandatory when the information discloses a cognizable offence, that a preliminary inquiry is permissible only in narrow categories, and that officers who fail to register should face action [2]. Earlier decisions had reached similar conclusions [3,4]. Parliament added a penal provision in 2013, criminalising the failure of a public servant to record information on specified serious offences [5,6], and the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS), which came into force on 1 July 2024, introduced electronic information and zero-FIR provisions into the statute itself [7].

Yet reports from human-rights organisations, national police surveys and academic studies continue to describe refusal and discouragement at the police-station counter [8–11]. This is the central paradox of the field: legal clarity coexists with behavioural discretion. The paradox cannot be resolved by restating the rule. It requires an analysis of accountability in the sense used in public-administration scholarship, namely a relationship in which an actor feels obliged to explain and justify conduct to a forum, which can pose questions, pass judgement and impose consequences [12]. Applied to FIR registration, each element of that relationship can be weak: the police officer's obligation is unevenly internalised, the forum (supervisory officer, magistrate, complaints authority) is often remote or slow, and the consequences are rarely imposed.

Police accountability itself is a contested and multi-layered concept. Scholars distinguish internal mechanisms, such as supervision and disciplinary procedures, from external mechanisms, such as courts, civilian oversight bodies, legislatures and the media [13,14]. The effectiveness of each depends on the others. Internal supervision alone is vulnerable to institutional loyalty, whereas external oversight alone cannot observe thousands of daily counter-level decisions. The question for FIR registration is therefore which combination of mechanisms makes refusal visible, costly and correctable.

This study addresses four research questions:

1. **RQ1.** What legal and institutional architecture governs FIR registration and the accountability of the officers who administer it?

2. **RQ2.** What does the available research evidence say about why FIRs are not registered, or are registered inaccurately?
3. **RQ3.** How do comparative oversight models handle failures in crime recording and complaint intake?
4. **RQ4.** What do official indicators reveal, and conceal, about registration practice, and which reforms follow from the evidence?

The paper makes three contributions. First, it consolidates dispersed legal, empirical and comparative material into a single analytic map. Second, it exposes a measurement problem that is usually treated as a footnote: because official crime statistics are built from registered FIRs, they cannot, without independent audit, verify the very practice they are used to evaluate. Third, it proposes a five-gap framework with testable propositions to guide future empirical work.

2. Conceptual and legal framework

2.1 Accountability, discretion and voice

Accountability research distinguishes the *information*, *discussion* and *consequence* phases of the accountability relationship [12]. Applied to a police station, the information phase requires that a refusal be recorded or otherwise observable; the discussion phase requires a forum before which the officer must explain; and the consequence phase requires a credible sanction or remedy. Weakness in any phase produces what this paper calls an accountability gap.

Because the police hold a practical monopoly on the initiation of criminal proceedings, a complainant who is turned away has no market alternative. In Hirschman's terms, "exit" is unavailable, so "voice" mechanisms, such as appeals to superior officers, magistrates and commissions, carry the entire burden of correction [15]. When voice is costly, slow or dangerous, the rational response of many citizens is silence. This explains why under-registration is hard to observe: those most affected are least likely to leave a record of the refusal.

Street-level bureaucracy theory adds that front-line officials ration scarce time and attention through routines and informal categorisation of clients, often in ways that diverge from formal rules [16]. In policing, discretion is not a deviation from the job; it is the job, and the central regulatory question is how to channel it [17,18].

2.2 The statutory architecture

Section 154(1) CrPC requires that information about a cognizable offence, given orally to the officer in charge of a police station, be reduced to writing, read over to the informant and signed by that person. Section 154(2) entitles the informant to a free copy. Section 154(3) provides that a person aggrieved by a refusal may send the substance of the information in writing and by post to the Superintendent of Police, who, if satisfied, shall investigate or direct

investigation. Where this fails, section 156(3) empowers a Magistrate to order investigation, and the complainant may also approach the Magistrate directly with a complaint [1]. The Criminal Law (Amendment) Act, 2013 inserted a requirement that information relating to specified offences against women be recorded, where possible, by a woman police officer, and added section 166A to the Indian Penal Code to penalise a public servant who knowingly disobeys a direction of law regarding the recording of information on specified offences [5,6]. The substance of this penal provision is retained in the Bharatiya Nyaya Sanhita, 2023 [19].

The BNSS, 2023 consolidates and modifies these arrangements. It permits information to be given by electronic communication, to be recorded on signature within a prescribed period, and to be registered irrespective of the territorial area in which the offence occurred (the “zero FIR” principle). It also allows a preliminary inquiry, with the permission of a senior officer and within a fixed period, for offences punishable with imprisonment of three years or more but less than seven years, and it codifies the magisterial route with a requirement to consider the police officer’s submission [7]. The zero-FIR concept had earlier been recommended by the Justice Verma Committee following the 2012 Delhi gang-rape case [20]. Section 36 of the Protection of Human Rights Act, 1993 limits the ordinary jurisdiction of the National Human Rights Commission to matters within one year of the incident, and its recommendations are not binding [21]. These design choices matter, because a remedy that is time-barred or recommendatory is a weaker accountability instrument than one that is binding and prompt.

2.3 Judicial doctrine

The judicial treatment of FIR registration has developed in layers. *State of Haryana v. Bhajan Lal* treated the FIR as the foundation of investigation and recognised that the information need not be a detailed account [3]. *Ramesh Kumari v. State (NCT of Delhi)* held that registration is mandatory when information discloses a cognizable offence and that internal “verification first” practices are impermissible [4]. *Lalita Kumari* resolved conflicting lines of authority, held that registration is mandatory, allowed a time-limited preliminary inquiry only in categories such as matrimonial or family disputes, commercial offences, medical negligence, corruption cases and cases with abnormal delay in reporting, and directed that reasons for not proceeding be recorded in the general diary [2].

Magisterial supervision was developed in *Sakiri Vasu v. State of U.P.*, which clarified that a Magistrate can direct registration and monitor investigation under section 156(3) [22], and in *Priyanka Srivastava v. State of U.P.*, which required that applications under that provision be supported by an affidavit and prior recourse to the police hierarchy, a safeguard against misuse that also raises the cost of voice for genuine complainants [23]. The bar on a second FIR for the same incident, articulated in *T.T. Antony v. State of Kerala*, further shapes the choices open to complainants and police [24].

Judicial doctrine also addresses the conduct that frequently follows registration. *Joginder Kumar, D.K. Basu* and *Arnesh Kumar* regulate arrest and custody [25–27]. *Nilabati Behera*

recognised compensation as a public-law remedy for custodial death [28]. *Youth Bar Association of India* directed that FIRs, other than those of a sensitive nature, be uploaded on police websites within 24 hours [29], and *Paramvir Singh Saini* required CCTV coverage of police stations [30]. Finally, *Prakash Singh v. Union of India* issued seven directions on structural police reform, including state security commissions, a minimum tenure for the head of police, separation of investigation from law and order, police establishment boards and police complaints authorities at state and district levels [31].

2.4 Historical and institutional roots

The Police Act, 1861 was designed for the maintenance of colonial order rather than for citizen service [32,33]. Historical studies of Indian policing describe a force organised around control, hierarchy and political direction, with accountability running upward to the executive rather than outward to the public [34,35]. Successive official bodies have diagnosed the consequences: the National Police Commission (1979-1981) [36], the Malimath Committee on criminal justice reform [37], the Model Police Act drafted in 2006 [38] and the Second Administrative Reforms Commission [39] all recommended statutory insulation from improper influence and stronger complaint mechanisms. The persistence of the same recommendations across decades is itself evidence that the problem is structural rather than episodic. Comparative police scholarship offers a useful benchmark: modern democratic policing is expected to answer to the law and to the community it serves, not only to executive direction, and reform succeeds when organisations are made answerable to both [40].

2.5 International norms

International standards frame registration and complaint intake as part of police integrity. The United Nations Code of Conduct for Law Enforcement Officials requires respect for the law and human dignity [41], the European Code of Police Ethics sets expectations of accountability and public trust [42], and the United Nations Office on Drugs and Crime handbook describes layered internal, external and civilian oversight as best practice [43]. The Convention against Torture, which India signed in 1997 but has not ratified, is also relevant because torture and coerced complaint withdrawal are common correlates of weak accountability [44].

3. Methods

3.1 Design and reporting standard

The study is a scoping review with a doctrinal legal component and a comparative institutional analysis. The reporting followed the PRISMA extension for scoping reviews (PRISMA-ScR) [45], and the flow of records is presented using the logic of the PRISMA 2020 flow diagram [46]. A scoping design was chosen because the evidence on FIR registration is heterogeneous, consisting of statutes, judgments, commission reports, surveys, experiments and theoretical

works. Such material cannot be pooled in a meta-analysis, and a conventional effect-size synthesis would be inappropriate. No protocol was registered. No primary data were collected.

3.2 Review questions and eligibility

The review used a Population-Concept-Context structure. The *population* comprised police officers and institutions responsible for receiving complaints, together with complainants and victims. The *concept* was accountability for the recording, non-recording or mis-recording of crime complaints. The *context* was India, with comparative material from other jurisdictions. Eligible sources were statutes, binding judgments, official reports and datasets, peer-reviewed articles and scholarly books, all published on or before 31 December 2024, in English or Hindi. The cut-off date reflects the publication requirement that the paper form part of a 2025 back issue and that its evidence base pre-date 2025. Sources published after that date, undated sources, opinion pieces, and sources unrelated to policing, criminal procedure or accountability were excluded.

3.3 Identification and screening

Two streams of sources were handled. **Stream A** consisted of a supplied list of 117 candidate references. Each entry was screened first on publication year and then on topical relevance to police accountability or to the methodological and sociological framing of the study. **Stream B** consisted of purposively identified primary and secondary sources, including statutes, apex-court judgments, parliamentary and commission reports, national datasets, and peer-reviewed or scholarly works located through citation-chaining from foundational works in police studies, procedural-justice research and comparative oversight scholarship. Stream B was not an exhaustive database search. It was designed to capture the authoritative and most-cited sources for each theme, and it should be read as a purposive scoping sample rather than a census.

3.4 Charting and synthesis

For each included source the following were charted: type, jurisdiction, design, key findings and relevance to the research questions. Qualitative material was synthesised using reflexive thematic analysis procedures [47], with themes developed iteratively across legal, empirical and comparative sources. Quantitative indicators from the National Crime Records Bureau for 2020, 2021 and 2022 were extracted, and percentage changes and shares were calculated by the author. Because the sources are heterogeneous, a formal risk-of-bias tool was not applied. Instead, each source was appraised on four pragmatic criteria: authority, methodological transparency, relevance to FIR registration, and corroboration by at least one independent source.

3.5 Research ethics and originality

The study used only published and publicly available material and therefore did not require ethical committee approval, consistent with accepted guidance on the ethics of social-science research that emphasises honesty in reporting, proper attribution and avoidance of harm [48]. Originality was safeguarded by synthesising and paraphrasing sources in the author's own words, attributing every borrowed idea, and screening the manuscript with similarity-detection software before submission, in line with recognised plagiarism-detection practice [49].

4. Results

4.1 Source selection

Figure 1 summarises the flow of records. Of the 117 candidate references supplied, 99 were excluded at the first stage, because 97 were published in 2025 or 2026 and two carried no publication year. Of the 18 that met the date criterion, 13 were excluded at the second stage because their subject matter (accreditation of higher education, international relations, patient safety, biography-based ethics and environmental studies) had no analytic connection to police accountability. Five Stream A sources were retained, which contributed to the sociological, methodological and ethical framing of the study [48–52]. Stream B contributed 84 further sources. In total, 89 sources were included in the synthesis.

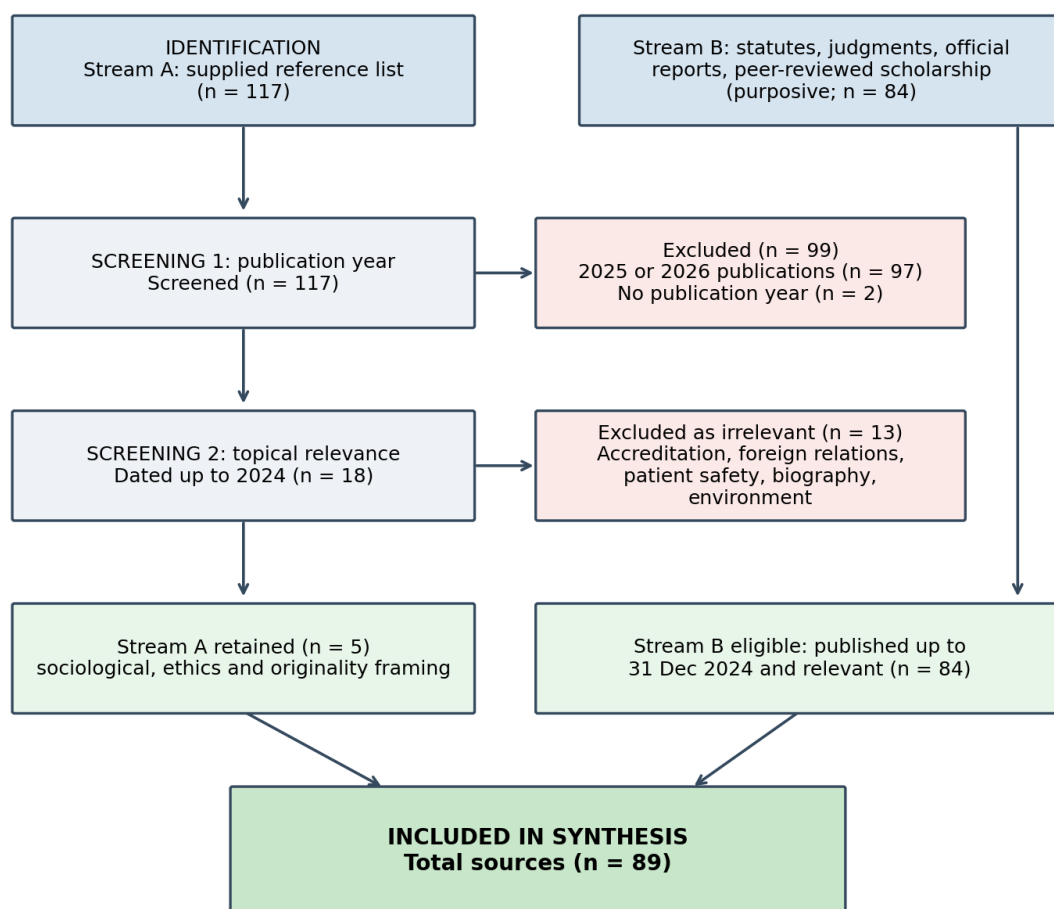


Figure 1. PRISMA-ScR-style flow of sources through identification, screening and inclusion (author's analysis). Cut-off date: 31 December 2024.

4.2 Characteristics of key empirical and comparative studies

Table 1 charts the principal empirical and comparative studies that inform the analysis. They vary in design, from randomised field experiments and large inspections to surveys and qualitative studies, and they come from India, England and Wales, Australia and the United States. This diversity is a strength for triangulation, but it limits direct comparison of effect sizes.

Table 1. Principal empirical and comparative sources and their reported outputs

Source	Setting and design	Reported output relevant to registration and accountability
Banerjee et al. [53]	Rajasthan, India; randomised evaluation of police reform components using decoy-victim visits	Reform effects were heterogeneous and generally modest across components; the study demonstrates that registration quality can be measured by standardised audit visits

Source	Setting and design	Reported output relevant to registration and accountability
HMIC [54]	England and Wales; national inspection of crime-recording integrity	Approximately 19% of reported crimes, and about 26% of sexual offences, were not recorded; weak supervision and target pressure were identified as contributory causes
Skogan [55]	International review of crime-reporting research	Victim reporting depends largely on perceived seriousness and expectation that police will act; non-reporting is therefore endogenous to police performance
Tarling and Morris [56]	England and Wales; analysis of national victimisation survey data	Reporting decisions are shaped by perceived seriousness, expected benefit and confidence in the police
Smith [57]	United Kingdom; analysis of reasons for not complaining about police	Perceived futility and fear of repercussions deter complaints, producing silent under-detection of misconduct
Sunshine and Tyler [58]	United States; survey-based test of legitimacy	Perceived fairness of procedures predicted legitimacy more strongly than perceived crime-control performance
Mazerolle et al. [59]	Queensland, Australia; randomised field trial of procedural-justice scripts	Procedurally just encounters improved citizens' perceptions of fairness and satisfaction
Belur [60]	Mumbai, India; qualitative study of police encounters	Organisational culture and peer expectations shape discretionary and extra-legal conduct
Verma [61]	India; analysis of cultural roots of police corruption	Corruption is sustained by organisational and cultural features, not solely by individual deviance
Human Rights Watch [8]	India; interview-based investigation	Documented refusal to register complaints, coercion, and impunity; identified weak oversight as a driver
Common Cause and Lokniti-CSDS [10,11]	India; national surveys of police personnel and citizens	Reported long working hours, resource constraints and varying public trust; links working conditions to service quality

4.3 Official indicators for 2020 to 2022

Table 1 shows that most robust evidence on registration practice comes from audits and experiments rather than from official statistics. The National Crime Records Bureau (NCRB) reported about 6.60 million cognizable crimes (Indian Penal Code and special and local laws combined) in 2020, 6.10 million in 2021 and 5.82 million in 2022 [62–64]. This is a decline of 11.8% between 2020 and 2022. By contrast, the NCRB recorded 371,503 cases of crimes against women in 2020, 428,278 in 2021 and 445,256 in 2022, a rise of 19.9% over the period; the share of crimes against women in all recorded cognizable crime increased from 5.6% to 7.6% [62–64].

These figures must be interpreted with caution (Figure 2). The 2020 total was inflated by a large number of offences connected with pandemic-related restrictions, so the subsequent decline is not evidence of a fall in underlying crime. The rise in recorded crimes against women is ambiguous in a different way: it may reflect growing victimisation, greater willingness to complain, improved registration following legal reform and public pressure, or all three. Without an independent victimisation survey, recorded counts cannot distinguish

between these explanations. The point is analytical rather than statistical. A rising registered count may signal either more crime or more responsive police, and a falling count may signal either less crime or more gatekeeping.

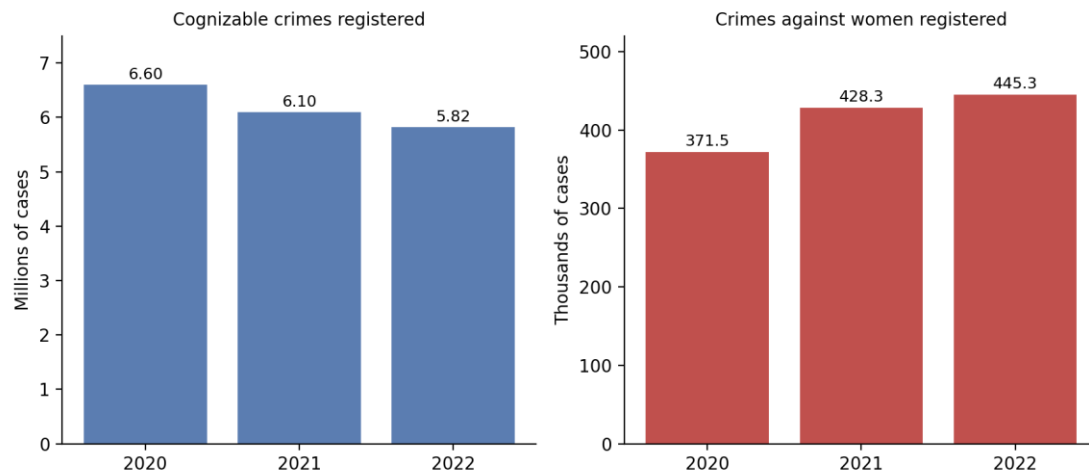


Figure 2. Cognizable crimes registered (left) and crimes against women registered (right) in India, 2020 to 2022. Source: author's compilation from NCRB annual reports [62–64]. Values are reported counts, not estimates of true incidence.

4.4 Thematic synthesis

Five themes emerged across legal, empirical and comparative sources. They are developed in Sections 5 to 8.

1. **Statistical incentives.** Where performance is judged by recorded crime, registration becomes a managerial variable.
2. **Capacity and workload.** Under-staffing and long hours increase rationing of attention.
3. **Discretionary culture.** Informal norms, loyalty and status-based treatment shape who is heard.
4. **Political and social filtering.** Local power relations influence which complaints are treated as consequential.
5. **Oversight design.** Remote, slow or non-binding forums leave refusal uncorrected.

5. Related research reviews, their results and analytic implications

5.1 Reporting, recording and the dark figure of crime

The international literature on crime reporting shows that victims' decisions to report depend on perceived seriousness and on whether they expect the police to respond [55,56]. This has an important implication: non-reporting is partly a consequence of past police behaviour. A police station that refuses complaints trains its population not to complain, and its low registration count then appears in statistics as evidence of low crime. The cycle is self-concealing.

The most instructive comparative finding comes from the national inspection of crime

recording in England and Wales, which found that roughly one in five reported crimes had not been recorded, with markedly worse performance for sexual offences [54]. The inspectors attributed the shortfall to weak supervision, inadequate training and performance pressure, rather than solely to individual dishonesty. The study is significant for India because it shows that non-recording occurs even in a system with high resources, strong audit traditions and independent inspection. In a system with fewer resources and no routine external audit of recording, there is little reason to expect better compliance. Research on the manipulation of crime statistics in the United States reached a similar conclusion, identifying managerial pressure to show reductions as a driver of downgrading and non-recording [65].

These findings are consistent with a general principle often stated as Campbell's law: the more a quantitative indicator is used for decision-making, the more it is subject to corruption pressures and the more it distorts the process it monitors [66]. Where promotions, rewards or reputations depend on crime numbers, an officer who registers every complaint may be penalised, and an officer who does not may be praised.

5.2 Police culture, discretion and status

Classic studies of policing identified a distinctive occupational culture characterised by solidarity, suspicion and a sense of mission [67,68]. Later work cautioned against treating culture as monolithic, showing instead that it varies by rank, task and organisation, and that it interacts with formal rules [69,70]. Discretion, not rule-following, is the typical mode of police work, and law gives only partial guidance [17,18]. A related sociological finding is that police responses vary with the social standing and demeanour of the complainant and the offender: higher-status complainants tend to receive more attention, and low-status groups tend to receive less [71].

Indian studies align with this picture. Analyses of police corruption emphasise cultural and organisational roots as well as individual wrongdoing [61]. Research on the use of deadly force in Mumbai showed how peer expectations and organisational narratives legitimise extra-legal action [60,72]. Ethnographic work portrays the police as a "provisional" authority negotiating order amid competing demands from politicians, communities and superiors, with law being only one resource among several [73]. Work on the political economy of criminality and policing demonstrates how political patronage shapes police postings and the treatment of influential offenders [74,75]. Taken together, these studies suggest that FIR refusal is often not a failure to know the law but a rational response to local power structures.

Sociological scholarship in Hindi on *sanskara* (socialised values and norms) and culture offers a complementary lens. It emphasises that conduct is shaped by internalised norms transmitted through language, family and community, and that institutions embed those norms [50–52]. Applied cautiously to policing, this suggests that officers import and reproduce wider social hierarchies of caste, class, gender and honour when they decide whose complaint is "serious". The point is a framing one; these works do not examine police behaviour directly.

5.3 Legitimacy and procedural justice

Research on legitimacy demonstrates that people comply with the law and cooperate with police mainly when they perceive authorities as fair and respectful, rather than only when they fear sanctions [76,77]. Survey evidence shows that perceived procedural fairness explains legitimacy more strongly than perceived effectiveness [58]. Cross-national analysis has shown that legitimacy shapes compliance [78], and that the quality of contact with police influences confidence in them [79]. A randomised field trial in Queensland found that procedurally just encounters improved perceptions of fairness and satisfaction [59].

For FIR registration, the implication is that the counter encounter is itself a legitimacy-forming event. A complainant who is heard, receives a copy of the FIR and is told what will happen next is more likely to trust the system, to return with further information and to support prosecution. Conversely, a complainant who is turned away carries that experience to family and community, which reduces future reporting. The legitimacy literature thus converts a legal duty into a social mechanism: registration is both a right and a trust-building ritual.

5.4 Oversight and complaints

Typologies of oversight distinguish models in which civilians review police investigations, models in which civilians investigate complaints independently, and hybrid models [13,14]. Studies of complaint systems show that many people do not complain because they believe nothing will happen or fear retaliation [57], and that complaints rarely lead to prosecution, which weakens deterrence [80]. Analyses of police reform emphasise that trust is a precondition and an outcome of reform, so that reform strategies that ignore public trust risk failure [81]. Integrity research stresses the importance of prevention, such as risk audits, supervision and ethics training, alongside discipline [82].

5.5 Indian institutional evidence

A Human Rights Watch investigation documented refusal to register complaints, coercion of complainants and impunity for misconduct, and linked these to political interference and inadequate oversight [8]. A study by the Commonwealth Human Rights Initiative reached comparable conclusions about the weakness of accountability mechanisms [9]. The Status of Policing in India Reports provide systematic survey evidence: they describe overstretched personnel working long hours with limited resources, and they relate these conditions to quality of service and public perceptions [10,11]. Police-population ratios have remained below sanctioned strength and below the benchmark frequently cited in policy documents [83]. A randomised evaluation in Rajasthan is particularly valuable because it moves beyond description to causal inference; using decoy-victim visits, it evaluated whether reforms to incentives, autonomy and training could improve complaint handling, and found effects that varied by component and were often modest [53]. The lesson is that registration quality is

measurable and improvable but not fixed by a single administrative change. Earlier commission reports had identified much of the same terrain [36–39], and the Supreme Court’s structural directions in *Prakash Singh* sought to operationalise it [31]. The uneven implementation of those directions across states is widely acknowledged in civil-society reviews [9,11].

5.6 Summary of review findings

Across these literatures, five findings recur. First, non-registration is endogenous: it generates the silence that conceals it. Second, official statistics are unreliable as a measure of registration practice unless independently audited. Third, culture and status matter as much as law. Fourth, procedural fairness at the counter has measurable effects on legitimacy. Fifth, oversight works best when it is independent, visible and able to compel change, a point developed comparatively in the next section.

6. Comparative analysis of oversight architectures

Table 2 compares selected oversight models. The comparison is institutional and legal; it does not claim a causal ranking, and the strength of each model depends on resourcing and political context that statutes alone do not capture.

Table 2. Comparative oversight arrangements relevant to complaint intake and crime recording

Jurisdiction	Principal bodies and legal basis	Strengths relevant to FIR-type accountability	Recognised limits
India	Supervisory review by Superintendent of Police and Magistrate under CrPC/BNSS [1,7]; Police Complaints Authorities directed in <i>Prakash Singh</i> [31]; National and State Human Rights Commissions [21]	Layered remedies; judicially enforced mandatory registration [2]; zero FIR and e-FIR in statute [7]	Remedies depend on complainant initiative and cost; complaints authorities unevenly constituted and mainly recommendatory; no routine external audit of recording [9,11]
England and Wales	Independent Office for Police Conduct, successor to the Independent Police Complaints Commission [84,85]; national inspectorate [54]	Independent investigation of serious matters; external inspection of crime-recording integrity with published findings	Even with oversight, substantial under-recording was found in 2014; public confidence depends on follow-through [54]
Northern Ireland	Police Ombudsman established by statute [86]	Fully independent investigative body created after a legitimacy crisis	Capacity and access to evidence determine effectiveness
South Africa	Independent Police Investigative Directorate [87]	Statutory duty to investigate deaths in custody and serious misconduct	Dependence on police cooperation and on implementation of recommendations
Kenya	Independent Policing Oversight Authority [88]	Civilian body with investigative and monitoring mandate	Resource constraints and compliance challenges

Jurisdiction	Principal bodies and legal basis	Strengths relevant to FIR-type accountability	Recognised limits
Pakistan	Police Order, 2002 introduced public safety commissions and complaint authorities [89]	Attempted separation of oversight from executive control	Reversal and uneven implementation in several provinces limited effect

Three lessons emerge. **First, independence is a necessary but not a sufficient condition.** Northern Ireland's Ombudsman and the English and Welsh complaints commission were created in response to legitimacy crises, and both are formally independent of the police [84,86]. Yet their effectiveness depends on investigative powers, resourcing and the willingness of forces to implement findings. Indian police complaints authorities, as directed in *Prakash Singh*, are often mainly advisory and are staffed from within the system, which weakens independence [9,31].

Second, external audit of recording is a distinct accountability tool. The English inspection of crime recording did not depend on individual complaints; it sampled records and compared them with reported incidents [54]. That methodology could be adapted for India through audits that compare helpline logs, hospital medico-legal records and general diary entries with registered FIRs. Such audits would convert a hidden behaviour into a measurable one, and the Rajasthan decoy-visit design shows that audit-style measurement is feasible within the Indian context [53].

Third, comparative cases warn against reform reversal. Pakistan's 2002 reform introduced new oversight institutions, but subsequent reversals and uneven implementation illustrate that legislative design is fragile when executive control is not seriously curtailed [89]. India's own history of repeated recommendations with limited implementation reflects the same dynamic [31,36,39]. International standards offer a normative reference but have no direct enforcement mechanism [41–43].

7. Analysis from multiple perspectives

7.1 Legal-doctrinal perspective

From a doctrinal viewpoint, the law is more developed than its application. The duty to register is clear, the remedies are layered, and the penal sanction for failure exists [1,2,6]. Three doctrinal tensions nevertheless weaken accountability.

The first is the **preliminary-inquiry tension**. *Lalita Kumari* confined preliminary inquiry to categories and a short period [2]. The BNSS now permits a preliminary inquiry for offences within a defined punishment band, with senior permission [7]. If this provision is applied broadly, it may restore through the statute the very practice of “verification before registration” that the Supreme Court sought to prevent [2,4]. Whether it operates as a safeguard or as a loophole will depend on recording of reasons, time limits and audit.

The second is the **cost-of-remedy tension**. The requirement of prior approach to the police hierarchy and an affidavit before a Magistrate acts is a rational safeguard against frivolous private complaints [22,23]. Yet it adds steps for the very complainants who have already been

turned away, and it presumes access to writing, postage, legal advice and time.

The third is the **sanction tension**. Section 166A and its successor provision criminalise specified failures [6,19], but criminal prosecution of police officers requires sanction and evidence, and the offences covered are limited. Disciplinary action is typically internal, rarely published and thus difficult to observe, which means that deterrence may be weaker than the formal law suggests.

7.2 Organisational and street-level perspective

At the station level, officers face competing demands: investigation, law-and-order duties, bandobast (security deployments), court appearances, VIP protection, and supervision by senior officers who prize short-term indicators. A system in which the same personnel are responsible for investigating crime and maintaining order produces conflicting priorities, which is why *Prakash Singh* required separation of these functions [31]. Survey evidence indicates long working hours and limited resources [11]. In such conditions, theory predicts rationing and the use of informal filters [16], and registration of a case that must then be investigated is, in workload terms, a cost to the officer. Without compensating incentives or credible penalties, refusal can be a rational response to organisational strain.

7.3 Psycho-social perspective

Psychological and sociological research suggests that complainants judge the police on the basis of how they are treated, not only on outcomes [58,76]. The counter encounter is brief, but its emotional impact is large: a victim of sexual violence, a family searching for a missing child or a labourer reporting wage theft is often in acute distress, and the way the officer responds can either validate or silence them. Fear of stigma, retaliation or social exclusion affects willingness to approach police at all [57]. On the police side, peer norms and a sense of solidarity can lead officers to discourage complaints that implicate colleagues or local influentials [67,68]. Cultural expectations of deference and honour, as emphasised in sociological accounts of norms and socialisation, can compound these dynamics [50–52].

7.4 Political-economy perspective

Police stations are embedded in local political economies. Where elected representatives influence postings and transfers, police have reasons to avoid antagonising powerful figures, and complaints that implicate them may be diluted or ignored [74,75]. The structural remedy proposed in *Prakash Singh*, fixed tenure and independent boards for postings, directly targets this channel [31]. Its uneven adoption suggests that those who benefit from discretionary control have limited incentive to relinquish it [9]. Political incentives also operate through statistics: governments seeking to demonstrate improved law and order may prefer low recorded crime, and this preference filters downward as managerial pressure [65,66].

7.5 Gender, marginality and intersectionality

Registration failures are not evenly distributed. Complaints of sexual violence, domestic violence, caste-based atrocities and offences against marginalised communities are the categories for which the law has specifically strengthened registration duties and for which refusal has attracted particular concern [5,8,20]. Status-sensitive theories of police behaviour predict that complainants of low social standing are treated less seriously [71]. The legislative requirement that certain statements be recorded by a woman officer shows legal recognition of the problem [5]. Yet implementation depends on the availability of women officers and on training, and the survey evidence of staffing constraints suggests that this may not be uniformly available [11,83].

7.6 Technological perspective

Technology can improve accountability if it creates tamper-resistant records. Electronic information, zero-FIR provisions, online FIR upload and CCTV coverage of stations all reduce opportunities for discretionary concealment [7,29,30]. However, technology does not by itself change incentives. An e-complaint that is converted into an inquiry without registration could simply move the gatekeeping from the counter to the back office. Effective digital design therefore requires an automatic acknowledgement, a unique tracking number, a time-stamped registration decision and routine audit of conversion rates from complaint to FIR.

7.7 Victim and community perspective

From the standpoint of the complainant, the FIR is rarely an abstract legal document. It is the first proof that an injury has been recognised. For a family reporting a missing person, a woman reporting domestic violence or a farmer reporting land grabbing, the days lost before registration can mean destroyed evidence, withdrawn witnesses and heightened danger. Reporting research indicates that victims weigh perceived seriousness, expected police action and potential costs before approaching the police [55,56]. In communities where earlier experiences of refusal are common, informal dispute settlement through village elders, caste councils or local influentials may replace the formal system, and this displacement is itself a measure of lost state legitimacy [73,77]. A victim-centred accountability model would therefore track not only whether an FIR was registered but also how long it took, who attended, whether a copy was provided and whether the complainant was satisfied with the explanation of next steps.

7.8 International-human-rights perspective

From a human-rights perspective, access to the criminal process is a component of the right to an effective remedy, and failure to investigate serious violations may itself engage state responsibility. The international framework on police ethics and the prohibition of torture supplies standards against which Indian practice can be assessed [41,42,44]. Judicial

recognition of compensation as a public-law remedy for custodial violations demonstrates the domestic receptiveness to such norms [28], although comparable remedies for non-registration are less developed.

8. Discussion: an analytical exposure of the accountability gap

8.1 Five exposed realities

The synthesis indicates that FIR non-registration is sustained by structural conditions that can be summarised as five realities.

Reality 1: The rule is not the problem. After *Lalita Kumari* and the statutory reforms, no officer can plausibly claim ignorance of the duty [1,2,7]. The persistent gap between rule and practice shows that compliance is determined by incentives, capacity and oversight, not by the clarity of the law.

Reality 2: The metric conceals the behaviour. Crime statistics are generated by registration. When the same statistic is used to evaluate the registering institution, there is a built-in conflict of interest [65,66]. The England and Wales inspection demonstrates the scale of the discrepancy that can exist even in a mature system [54].

Reality 3: The complainant carries the burden of enforcement. Remedies such as approaching the Superintendent of Police or a Magistrate require literacy, resources, time and courage [1,23]. The people most likely to be refused, who are poor, marginalised or in conflict with local power, are the least able to use them [15,71].

Reality 4: Oversight forums are remote and often non-binding. Complaints authorities and human-rights commissions can recommend, but they cannot reliably compel [9,21]. Where external bodies have independence, resources and publicity, the credibility of accountability is higher [54,84,86].

Reality 5: Legitimacy is both the cost and the reward. Each refusal reduces trust, and low trust reduces reporting and cooperation, which in turn undermines policing effectiveness [55,58,77]. Accountability for registration is therefore not a constraint on policing but an investment in its legitimacy.

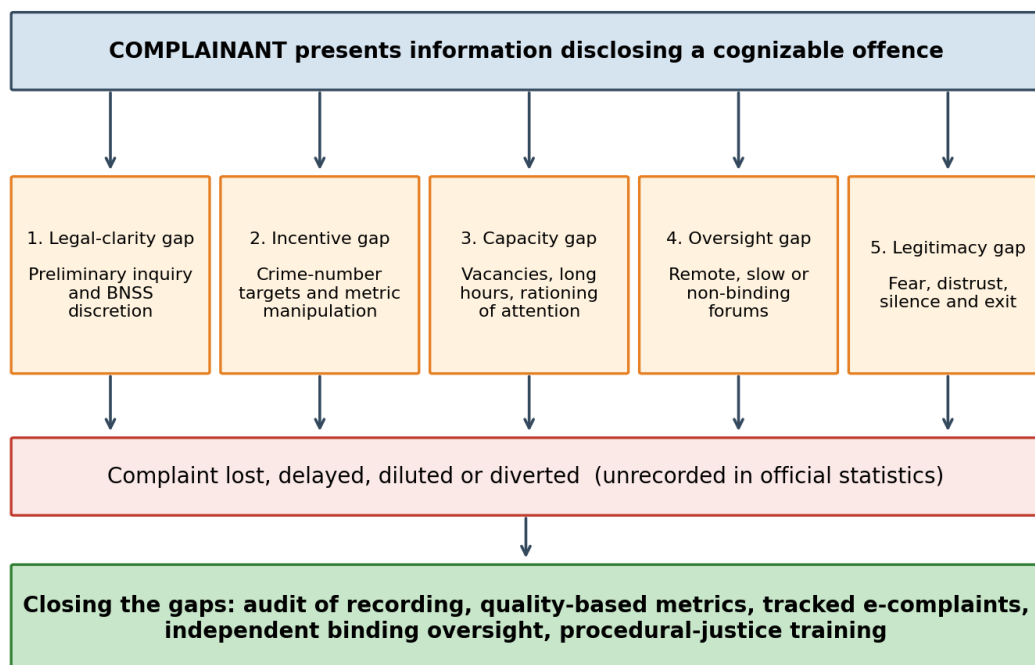


Figure 3. Five-gap framework of accountability in FIR registration. Complaints can be lost at each of five points between the complainant and a binding remedy (author's conceptual model).

8.2 A five-gap framework and testable propositions

Figure 3 translates these realities into a framework in which a complaint can be lost at five points: the legal-clarity gap, the incentive gap, the capacity gap, the oversight gap and the legitimacy gap. The framework generates five propositions suitable for empirical testing.

- **P1 (Incentive).** Police stations whose personnel are evaluated primarily on recorded-crime reductions will show a lower conversion rate from complaint to FIR than stations evaluated on audited case-handling quality [65,66].
- **P2 (Capacity).** Conversion from complaint to FIR will be inversely related to workload per officer and to vacancy levels [11,16].
- **P3 (Status).** Decoy complainants of lower apparent social status will encounter a lower probability of immediate registration than higher-status decoys for identical complaints [53,71].
- **P4 (Oversight).** Districts with functioning, independent complaints bodies that can issue binding directions will show higher conversion rates and fewer repeated complaints against the same station [13,14].
- **P5 (Legitimacy).** Procedurally just counter encounters, including provision of a copy of the FIR and explanation of next steps, will increase subsequent reporting and cooperation [59,77].

These propositions are the author's analytical hypotheses derived from the reviewed literature. They are not findings of this study and should be tested with audit, experimental or administrative-data designs.

8.3 Why reform stalls: reading the evidence together

A striking feature of the evidence base is that diagnoses are consistent while implementation is not. Commission after commission has recommended insulation from improper influence, stronger complaint machinery and better professional standards [36–39], and the Supreme Court has translated several of these into directions [31]. Three explanatory mechanisms are plausible. The first is a **beneficiary problem**: actors who gain from discretionary control over police, including some political and administrative decision-makers, are asked to approve reforms that limit that control [74,75]. The second is a **visibility problem**: because refusals are not recorded, there is no routine data to embarrass poorly performing stations or to reward good ones, and reform lacks a constituency of evidence [54,66]. The third is a **sequencing problem**: reforms that change statutes without changing incentives, supervision and capacity produce formal compliance and substantive drift, as the Rajasthan experiment suggests when it shows that single-component changes yield uneven results [53]. A reform strategy that attends to all three mechanisms would pair legal change with published audit data, independent forums and managerial incentives tied to quality rather than quantity.

8.4 Implications of the BNSS reforms

The BNSS contains potential improvements, notably electronic information, zero FIR and codified magisterial review [7]. Its preliminary-inquiry provision, however, is a double-edged instrument. Where it is used transparently, with reasons recorded and time limits observed, it may reduce frivolous or malicious registrations. Where it is used as a default filter, it risks reintroducing the discretionary gatekeeping that *Lalita Kumari* sought to close [2]. The decisive variable will be whether decisions to hold a preliminary inquiry are themselves recorded, time-stamped and subject to audit. Early scholarship on the implementation of the new code is necessarily limited because it came into force only in mid-2024, and evidence on its operation should be treated as preliminary.

9. Recommendations

The following recommendations follow directly from the evidence and are ordered from those requiring administrative action to those requiring legislative change.

1. **Institutionalise external audit of recording.** Adopt a recurring audit modelled on the English inspection method, comparing sampled helpline, hospital and general-diary entries with registered FIRs, with findings published at district level [53,54].

2. **Change performance metrics.** Replace raw crime-reduction targets with audited indicators such as conversion rate from complaint to FIR, time to registration, supply of FIR copy to the informant and complainant satisfaction [65,66].
3. **Make refusal observable.** Require an automatic written or electronic acknowledgement for every complaint, a unique tracking number, and a time-stamped record of any decision not to register, with reasons [2,7].
4. **Constrain preliminary inquiry.** Issue binding guidelines and a reporting format for preliminary inquiries under the BNSS, including time limits, recorded reasons and supervisory review [2,7].
5. **Strengthen supervisory and magisterial remedies.** Provide standard-format online appeal channels to the Superintendent of Police, with fixed response times, and facilitate legal-aid assistance for complainants approaching a Magistrate [1,22,23].
6. **Empower independent complaints bodies.** Constitute police complaints authorities as directed, with non-police leadership, investigative staff and the power to issue binding recommendations, drawing on comparative designs [31,86–88].
7. **Reduce political filtering.** Implement fixed tenures and independent postings boards [31,38].
8. **Invest in capacity and supervision.** Address vacancies and workload, and train supervisors in the review of records [11,54,83].
9. **Embed procedural justice.** Train front-desk staff in respectful, explanatory communication and evaluate the training using experimental or quasi-experimental designs [59,77].
10. **Protect vulnerable complainants.** Ensure women officers are available for specified offences, set up victim-support desks and monitor registration of offences against marginalised groups [5,20,71].

10. Future research agenda

Four research priorities follow from this review. First, audit studies using standardised decoy or simulated complainants, extending the Rajasthan design to other states and offence types, are needed to estimate true registration probabilities and their variation by complainant status and offence [53,71]. Second, administrative-data analysis should compare registration, preliminary-inquiry and closure patterns before and after the BNSS came into force, using complaint-to-FIR conversion as a core measure [7]. Third, qualitative research with complainants who were refused, and with officers who describe the pressures behind refusal, would illuminate mechanisms that statistics cannot reveal [47,60]. Fourth, comparative evaluation of oversight bodies should examine which design features, such as investigative autonomy, binding powers, public reporting and funding security, are associated with improved compliance [13,14,43].

11. Limitations

This study has several limitations. First, it is a scoping review rather than an exhaustive systematic review; the Stream B identification was purposive and citation-based, so relevant

sources may have been missed, and the findings reflect the authority and prominence of included sources. Second, the cut-off date of 31 December 2024 means that evidence from the first months of operation of the BNSS, and any later judicial interpretation, is not captured. Third, much of the comparative evidence originates in jurisdictions with different legal and institutional contexts, so transferability must be assessed with caution. Fourth, official NCRB data measure registered cases and cannot estimate unregistered complaints; the descriptive indicators are therefore illustrative. Fifth, the five propositions are conceptual and have not been tested empirically in this study. Sixth, the number of Stream A sources that could be used was limited by the date criterion and by topical relevance, and sociological sources in Hindi addressed culture and norms in general rather than police conduct specifically [50–52]. Finally, a focus on registration should not obscure the equally important accountability questions that arise at the stages of investigation, arrest, custody and trial [25–27].

12. Conclusion

FIR registration is the point at which the promise of equal protection of the law is either honoured or quietly withdrawn. The evidence reviewed in this paper indicates that refusal is not best explained as a series of isolated lapses by individual officers. It is better explained as the predictable result of five interacting gaps: incentives that reward low recorded crime, capacity that rations attention, cultures and status hierarchies that filter complaints, politics that shapes postings and priorities, and oversight forums that are remote or unable to compel. The Indian legal framework, from *Lalita Kumari* to the BNSS, has progressively clarified the duty to register [2,7]. What remains underdeveloped is the machinery that makes non-compliance visible and costly.

Comparative experience suggests that this machinery can be built. Independent complaints bodies, external audits of crime recording, procedural-justice training and transparent digital records have each shown value elsewhere [54,59,86], and the Rajasthan experiment demonstrates that registration quality can be measured within India [53]. The key analytical lesson is that what is not measured independently will not be reliably improved. Future research should test the five propositions through audit studies, administrative-data analysis of the BNSS reforms and qualitative inquiry with complainants who have been refused. Policy should treat FIR registration as a measurable service standard, enforceable by forums that complainants can reach and that can compel change.

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