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An Empirical Study on Human Rights Violations of Police Personnel in the City of Vadodara

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ABSTRACT

This article examines human rights violations against police personnel within the criminal justice administration system, with specific focus on Vadodara City Police, Gujarat. While scholarship on policing and human rights has traditionally centred on violations committed by police against the public, this study adopts a reverse and comparatively underexplored lens: it treats police personnel themselves as rights-holders entitled to dignity, safety, humane working conditions, health, and fair internal procedures. Using a non-doctrinal empirical method supported by limited doctrinal analysis, primary data was collected through an anonymous questionnaire administered to 41 respondents drawn from various wings and ranks of Vadodara City Police, including auxiliary forces such as Home Guards and the Gujarat Reserve Police Auxiliary ("GRD"). The findings reveal a consistent pattern of high duty intensity, occupational stress with inadequate institutional mental-health support, safety vulnerability without assured compensation, acute dissatisfaction with pay and allowances (particularly among auxiliary personnel), a perceived gap between individual comfort in raising grievances and the effectiveness of formal grievance mechanisms, and significant psychological pressure arising from social media misrepresentation. The article situates these findings within the constitutional and international human rights framework, particularly Articles 14 and 21 of the Constitution of India, and Indian judicial doctrine on dignity, non-arbitrariness, and reputation, before proposing practical legal, administrative, and welfare measures to address rights-related harm without compromising police accountability.

Keywords: *police personnel, human rights, criminal justice administration, occupational stress, auxiliary police forces, grievance redressal, Article 21, Vadodara City Police*

I. INTRODUCTION

The police institution occupies a central position in the criminal justice administration system, being responsible for the maintenance of law and order and the security of life and property. In a constitutional democracy, the police are not merely a law-enforcement agency but perform a

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public service function whose daily decisions shape public trust and the legitimacy of governance. The Supreme Court has repeatedly interpreted Article 21 to mean that the right to life is not confined to “mere animal existence” but includes the right to live with human dignity,¹ a principle equally applicable when the State is the employer of the individual whose dignity is in question.

Existing scholarship and policy debate on “human rights and policing” has overwhelmingly examined violations committed by police against citizens, an essential focus for accountability, but one that captures only half the institutional reality. Police personnel are themselves human beings and rights-holders, expected to enforce law under demanding and unpredictable conditions: frequent emergencies, hostile public encounters, high-stakes decision-making under time pressure, and strict internal discipline. National empirical research has repeatedly highlighted long working hours, limited rest, and occupational stress as recurring features of policing in India, reinforcing the need to examine police welfare as a rights-linked concern rather than a purely administrative one.

The present study focuses on Vadodara City Police, which operates a commissionerate-style urban policing structure combining routine police-station functioning with specialised wings: crime branch, cyber cell, traffic, women-safety initiatives (including the She Team), special operations, and auxiliary categories such as Home Guards and GRD. In this study, “human rights violations of police personnel” refers to situations, practices, or working conditions that unlawfully, unfairly, or detrimentally affect police personnel as rights-holders, including excessive duty hours without rest, denial of leave, unsafe deployment without protective support, workplace humiliation, mental-health stress, unfair disciplinary or transfer practices, inadequate welfare support, weak grievance mechanisms, and reputational harm from malicious or misleading digital content.

A. Objectives of the Study

- To identify key rights-related problems faced by police personnel in Vadodara City Police.
- To analyse duty pressure, welfare concerns, and institutional gaps across departments and wings, including auxiliary forces.
- To assess the impact of public and media pressure, and of digital misrepresentation, on the dignity and well-being of personnel.

¹ *Francis Coralie Mullin v. Administrator, Union Territory of Delhi*, (1981) 1 SCC 608.

- To suggest practical legal, administrative, and welfare measures to reduce rights-related harm while preserving institutional accountability.

B. Research Methodology

The study adopts a non-doctrinal empirical method supported by limited doctrinal analysis. Primary data was collected through an anonymous Google Forms questionnaire, which received 41 responses from personnel across various departments and wings of Vadodara City Police, including auxiliary forces such as Home Guards and GRD. Responses were provided by both higher-ranked and lower-ranked personnel; individual ranks were not disclosed, and results are reported only in aggregated form to protect confidentiality. Findings are analysed through descriptive statistics (frequency and percentage distribution) and thematic interpretation, supplemented by doctrinal analysis of the applicable constitutional, statutory, and international legal framework.

C. Limitations

The sample of 41 respondents, while spanning multiple ranks and wings, is self-selected and modest in size; the findings should therefore be read as indicative of patterns within Vadodara City Police rather than as statistically generalisable to Indian policing at large. The study also relies on self-reported perception data, which is valuable for understanding lived experience but does not independently verify institutional records.

II. LEGISLATIVE AND CONSTITUTIONAL FRAMEWORK

The rights of police personnel must be considered within two interconnected legal frameworks: the general human rights framework applicable to all persons, grounded in dignity, safety, equality, health, and fair treatment; and the criminal justice administration framework, which confers police powers and duties while fixing responsibility and accountability. Problems such as unsafe deployment, humiliation, unrealistic duty hours, unfair internal procedure, and low allowances for auxiliary forces are not merely administrative issues; they engage constitutional values of dignity, fairness, and humane treatment.

A. International Framework

The Universal Declaration of Human Rights, 1948 lays down foundational standards of dignity (Article 1), security of person (Article 3), freedom from degrading treatment (Article 5), equality before law (Article 7), effective remedy (Article 8), and just and favourable conditions of work (Article 23), each of which bears directly on the working conditions of police personnel.²

² *Universal Declaration of Human Rights*, G.A. Res. 217A (III), U.N. Doc. A/810 (1948).

The International Covenant on Civil and Political Rights, 1966 imposes binding obligations on States regarding life and security of person (Articles 6 and 9), freedom from torture and degrading treatment (Article 7), fair procedure (Article 14), and protection of privacy and reputation (Article 17), the last of which is particularly relevant to reputational harm arising from digital misrepresentation.³

The International Covenant on Economic, Social and Cultural Rights, 1966 recognises the right to just and favourable conditions of work, including safe conditions and reasonable limitation of working hours (Article 7), and the right to the highest attainable standard of physical and mental health (Article 12), providing a normative benchmark for assessing duty hours, rest, and occupational health among police and auxiliary forces.⁴

Finally, the UN Code of Conduct for Law Enforcement Officials, 1979 and the UN Basic Principles on the Use of Force and Firearms, 1990 require that law enforcement be conducted with respect for human dignity, professional restraint, and institutional integrity, underscoring that a rights-respecting institutional culture cannot be sustained where personnel themselves are subject to degrading or unfair treatment.⁵

B. National (Constitutional and Statutory) Framework

Domestically, Articles 14 and 21 of the Constitution of India apply to police personnel no less than to any other person. Article 14 strikes at arbitrariness in State action, a principle of direct relevance to postings, transfers, and disciplinary decisions affecting police personnel; Article 21 guarantees a right to life that includes dignity and is not confined to mere physical existence. While the Directive Principles of State Policy are not directly enforceable, Article 39(d), which embodies the principle of equal pay for equal work, provides an important normative benchmark for assessing pay disparities affecting auxiliary personnel performing duties comparable to regular police.

The transition from the Code of Criminal Procedure, 1973 to the Bharatiya Nagarik Suraksha Sanhita, 2023 (in force from 1 July 2024) has reshaped procedural obligations (investigation, arrest, search and seizure, bail, and production before magistrates) in ways that, absent adequate staffing and resources, may increase documentation burden and accountability pressure on field personnel.⁶

³ *International Covenant on Civil and Political Rights*, 999 U.N.T.S. 171 (1966).

⁴ *International Covenant on Economic, Social and Cultural Rights*, 993 U.N.T.S. 3 (1966).

⁵ *UN Code of Conduct for Law Enforcement Officials*, G.A. Res. 34/169 (1979); *UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials* (1990).

⁶ *Bharatiya Nagarik Suraksha Sanhita, 2023*, Act No. 46 of 2023 (India).

The Police Act, 1861, together with State police laws and service rules, continues to structure Indian policing as a strictly disciplined force, with limited flexibility around leave, absence, and outside engagement, a structural feature that intensifies rights and welfare concerns relating to duty hours and internal fairness. The Protection of Human Rights Act, 1993, which established the National and State Human Rights Commissions, defines “human rights” by reference to life, liberty, equality, and dignity as recognised under the Constitution and relevant international covenants, bringing the working conditions of police personnel squarely within its interpretive scope.

A specific and acute concern within this framework is the remuneration of auxiliary forces. In Gujarat, Home Guards are treated as an honorary or auxiliary force paid a daily duty allowance rather than a regular monthly salary, in contrast to the fixed pay structure applicable to regular police personnel performing comparable duties. Precise current rates are published on the official portal of the Gujarat Home Guards Organisation and should be verified against the latest notification at the time of publication, as such allowance schedules are periodically revised.

III. JUDICIAL APPROACH

Although Indian courts most frequently address policing in the context of citizen rights, the constitutional principles the judiciary has developed on dignity, fair procedure, non-arbitrariness, service fairness, reputation, and institutional reform are equally instructive when police personnel are viewed as rights-holders.

In *Maneka Gandhi v. Union of India*, a seven-judge bench held that any procedure affecting life or personal liberty must be just, fair, and reasonable, and that Articles 14, 19, and 21 must be read together as an integrated scheme, a principle that supports the requirement that administrative actions affecting police personnel, including duty deployment and disciplinary process, satisfy standards of fairness and non-arbitrariness.⁷

In *Francis Coralie Mullin v. Administrator, Union Territory of Delhi*, the Court held that the right to life is not limited to mere animal existence but includes the right to live with human dignity, a holding directly relevant to whether excessive duty hours, denial of rest, unsafe deployment, and workplace humiliation undermine the dignity guaranteed under Article 21.⁸

The principle that Article 14 strikes at arbitrariness in State action, established in *E.P. Royappa v. State of Tamil Nadu* and reaffirmed in *Ajay Hasia v. Khalid Mujib Sehravardi*, supports scrutiny of internal police administration, including transfers, postings, and disciplinary

⁷ *Maneka Gandhi v. Union of India*, (1978) 1 SCC 248.

⁸ *Francis Coralie Mullin*, *supra* note 1.

practice, through a constitutional lens of fairness and reasonableness, while *Shilpi Bose v. State of Bihar* clarifies that judicial interference in routine transfers is warranted only where mala fides or rule violations are shown.⁹

In *Prakash Singh v. Union of India*, the Supreme Court issued binding directives on police reform, including fixed tenure, functional separation, and independent complaints authorities, recognising that professional and rights-respecting policing depends on structural insulation from undue influence, a reform framework directly relevant to the weak grievance mechanisms and political interference identified in the empirical findings below.¹⁰

The principle of equal pay for equal work, recognised in *Randhir Singh v. Union of India* and extended to daily-wage and temporary employees in *State of Punjab v. Jagjit Singh*, provides a fairness benchmark for evaluating allowance disparities affecting auxiliary personnel whose duties and risk exposure substantially overlap with regular police work.¹¹

Vishaka v. State of Rajasthan affirmed that workplace dignity and safety are constitutional concerns linked to Articles 14 and 21, supporting the treatment of workplace harassment and humiliation within police institutions as rights-linked issues requiring preventive mechanisms.¹²

Finally, *Subramanian Swamy v. Union of India* recognised reputation as an element of dignity under Article 21, lending constitutional weight to the finding that viral and misleading digital content constitutes a genuine dignity-related harm for serving police personnel.¹³

IV. DATA ANALYSIS AND FINDINGS

A. Respondent Profile

Of the 41 respondents, 61.0% were male and 39.0% female. Age distribution was concentrated in the 36–45 bracket (41.5%), followed by 26–35 (29.3%) and 46–55 (26.8%); service experience was concentrated between six and 20 years. Wing representation included Police Station or General Duty (43.9%), Home Guards (17.1%), Traffic and TRB (14.6%), She Team (7.3%), Cyber Cell (4.9%), and GRD (4.9%), with duty type predominantly “mixed” (78.0%).

⁹ *E.P. Royappa v. State of Tamil Nadu*, (1974) 4 SCC 3; *Ajay Hasia v. Khalid Mujib Sehravardi*, (1981) 1 SCC 722; *Shilpi Bose v. State of Bihar*, 1991 Supp (2) SCC 659.

¹⁰ *Prakash Singh v. Union of India*, (2006) 8 SCC 1.

¹¹ *Randhir Singh v. Union of India*, (1982) 1 SCC 618; *State of Punjab v. Jagjit Singh*, (2017) 1 SCC 148.

¹² *Vishaka v. State of Rajasthan*, (1997) 6 SCC 241.

¹³ *Subramanian Swamy v. Union of India*, (2016) 7 SCC 221.

B. Key Findings

Duty intensity was found to be high: 78.0% of respondents reported more than 25 duty days per month, and 83% reported nine or more duty hours per day. On working-condition indicators, a majority selected “Sometimes” for excessive duty hours (68.3%), denied or postponed leave (68.3%), and paperwork burden (53.7%), suggesting that duty pressure is a frequent rather than an occasional feature of service.

Occupational stress and burnout were prominent: 73.2% and 24.4% respectively selected “Sometimes” and “Agree” that work stress affects sleep and health, and a similar pattern was reported for burnout. Critically, 97.6% disagreed that the department provides sufficient counselling or mental-health support, and 95.1% agreed that stigma or fear discourages help-seeking, indicating that occupational stress exists without a structured institutional response.

On safety, 63.4% reported “Sometimes” experiencing risk of physical harm during duty and 31.7% reported experiencing threats due to duty; yet 90.2% disagreed that they would receive adequate support or compensation if injured on duty, revealing a significant gap between operational risk and welfare assurance.

On internal fairness, a notable asymmetry emerged: 82.9% of respondents felt they could raise grievances without fear of retaliation, and 95.1% considered internal inquiries fair, yet 95.1% simultaneously disagreed that an effective formal grievance system exists. This suggests that personal comfort in raising individual concerns coexists with a perceived structural weakness in the grievance mechanism itself.

On digital-era pressures, although only 29.3% reported being recorded by the public during duty at least rarely, 100% agreed that viral posts increase fear of misrepresentation, 97.6% agreed that misleading or edited videos harm dignity and reputation, and 100% agreed that social media pressure affects mental well-being, indicating that the psychological impact of digital misrepresentation is disproportionate to its reported frequency.

Pay and allowance dissatisfaction emerged as the most dominant concern: 90.2% disagreed that pay and allowance is fair relative to duty risk and workload, and 97.6% agreed that daily allowances paid to Home Guards, GRD, and TRB personnel are too low relative to duty hours and risk and should be increased toward parity with regular police for comparable duties. When asked to select the top three problems, respondents most frequently identified low pay or allowance (87.8%), a weak grievance system (80.5%), and media and social media pressure (58.5%). On the overall question of whether their rights as police personnel are adequately protected, 95.1% disagreed, the single strongest finding of the study.

V. DISCUSSION

The findings collectively suggest that rights-related vulnerability among Vadodara City Police personnel is not an occasional or isolated phenomenon but a structural feature of daily service, linked to duty management, welfare assurance, grievance effectiveness, mental-health support, and the digital-era public environment. Read against the constitutional and judicial framework discussed above, several observations follow.

First, the near-universal disagreement (95.1%) that an effective grievance mechanism exists, despite comparatively high confidence in raising individual grievances without retaliation, indicates that the deficiency lies not in personnel's willingness to speak but in the institutional design of the mechanism itself, a gap the *Prakash Singh* reform framework was specifically intended to address through independent complaints authorities.

Second, the co-existence of high stress and burnout indicators with a near-total absence of institutional counselling support (97.6% disagreement) and high stigma (95.1% agreement) suggests that occupational mental health in this dataset is being managed, if at all, informally and individually rather than institutionally, a condition that, under *Francis Coralie Mullin*, engages the dignity component of Article 21 rather than being a purely administrative or budgetary matter.

Third, the finding that auxiliary forces performing duties comparable to regular police receive a daily allowance of approximately Rs. 454, and that 97.6% of all respondents (including regular police) believe this is inadequate and should move toward parity, directly engages the equal-pay-for-equal-work principle recognised in *Randhir Singh* and extended to daily-wage employees in *State of Punjab v. Jagjit Singh*. This is arguably the most legally actionable finding of the study, since it rests on an established doctrinal foundation rather than requiring novel constitutional interpretation.

Fourth, the finding that social media pressure and fear of misrepresentation are reported as near-universal stressors, despite a comparatively low incidence of actual recording, suggests that the reputational harm identified in *Subramanian Swamy v. Union of India* operates prospectively and psychologically, as an ambient institutional pressure, and not merely as a response to discrete incidents. This has implications for the design of departmental digital-conduct protocols, which should address anticipatory anxiety and not only reactive incident management.

Fifth, it is worth noting what the data does not show. Respondents did not, on the whole, report resentment toward the accountability function of policing itself; there is no indication in the

responses that personnel object to being recorded, questioned, or held to professional standards. What is reported instead is an absence of institutional scaffolding around that accountability: no counselling mechanism to process the stress it generates, no reliable channel to contest unfair outcomes, and no financial safety net commensurate with the risk it entails. This distinction matters for how any reform proposal is framed. A response aimed at insulating police personnel from public scrutiny would misread the data; a response aimed at building the institutional support structures that scrutiny-heavy, high-risk public service requires would not.

Read together, the six patterns identified above point to a single underlying dynamic rather than six unrelated problems: in each domain (duty hours, mental health, safety, grievance handling, digital exposure, and pay) individual-level coping exists, in that personnel manage stress informally, raise grievances personally, and absorb reputational risk, in the absence of institution-level structures to support that coping. The reform implication is accordingly less about introducing entirely new rights and more about formalising protections that the constitutional and statutory framework already contemplates but that have not been operationalised at the level of daily police administration in Vadodara.

VI. RECOMMENDATIONS

- **Working hours and rest:** introduce structured shift-based duty planning where feasible, formalise minimum rest intervals after extended duties, and guarantee compensatory off where weekly rest is denied due to genuine operational necessity.
- **Mental health support:** establish confidential counselling access with anonymity safeguards, institutionalise periodic anti-stigma sensitisation, and train supervisory officers to recognise early indicators of burnout.
- **Safety and welfare assurance:** strengthen protective equipment and backup protocols for high-risk duties, and introduce a clear, publicised protocol for injury-related compensation to close the gap between perceived risk and perceived support.
- **Grievance redressal:** establish a time-bound, tracked grievance process (receipt, inquiry, decision) with periodic senior-level review, and ensure that postings, transfers, and disciplinary decisions are supported by recorded, consistent reasons to reduce perceived arbitrariness, consistent with the *Prakash Singh* reform framework.
- **Digital misrepresentation:** create a standard institutional protocol for responding to viral or misleading content involving personnel, including access to legal guidance in cases of serious reputational harm, while preserving legitimate public accountability recording.

- **Pay and allowance parity:** reassess daily allowance rates for Home Guards, GRD, and TRB personnel in light of duty hours and risk exposure, and consider a transition toward structured monthly or consolidated payment models for auxiliary personnel performing regular and continuing duties, extending welfare supports (medical, accident, uniform, training) more uniformly across categories.
- **Implementation sequencing:** given the resource and budgetary constraints typical of urban police commissionerates, the measures above need not be implemented simultaneously. A phased approach, beginning with the two lowest-cost, highest-impact interventions identified by the data (a tracked grievance process and a published injury-compensation protocol, both administrative rather than financial reforms), would address the findings that respondents rated most severely (95.1% on grievance-system effectiveness; 90.2% on injury support) without requiring new budgetary allocation. Allowance revision and expanded counselling infrastructure, which do carry direct cost implications, can follow in a second phase, potentially informed by a follow-up survey to measure whether the first-phase administrative reforms produced measurable improvement in perceived fairness before committing to the larger financial outlay.

VII. CONCLUSION

This study demonstrates that human rights concerns relating to police personnel in Vadodara City are not exceptional but reflect a daily service reality shaped by duty intensity, inadequate institutional mental-health support, unresolved safety and compensation gaps, a structurally weak grievance mechanism, disproportionate psychological pressure from digital misrepresentation, and acute dissatisfaction with pay and allowances, particularly among auxiliary forces. None of these findings is in tension with police accountability; rather, they support the proposition, consistent with Indian constitutional doctrine on dignity and non-arbitrariness, that protecting the rights of police personnel strengthens rather than undermines professional performance and the legitimacy of criminal justice administration. The recommendations advanced in Part VI are intended as practically implementable measures within the existing administrative structure of Vadodara City Police, and may offer a template for similarly structured empirical inquiry in other Indian police commissionerates.
