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Wrongful Convictions and Compensation: Need for a Statutory Framework

-Ashna Ahmad

ABSTRACT:

India does not have any law to pay the victims who have suffered wrongful accusation, arrest or imprisonment. Due to this absence of law, Supreme Court had been creating its own jurisprudence to provide compensatory relief since the “*Rudul Sah v. State of Bihar (1983)*” case by viewing compensation as a public law relief. However, this attempt of court has not been continuous & uniform. This paper seeks to evaluate laws involved in the process of compensation for wrongful prosecution in India following the journey starting from “*Rudul Sah*” till “*V. Senthil Balaji (2024)*” & 277th Law Commission Report (2018). The paper also highlights that judicial intervention is not a substitute for the legislation in this regard & thus suggests laws to be introduced in this direction.

Keywords: Wrongful conviction, Compensation, Law Commission Report, Bharatiya Nagarik Suraksha Sanhita, Article 21.

INTRODUCTION:

The conviction of an innocent individual is one of the few occurrences that can diminish the trust of people in legal system. Whenever the law enforcement system fails, its total damages usually occur to someone who had to sacrifice years of his life & honour. The assertion by “William Blackstone that sometimes it is more important for ten guilty people to be released than for one innocent person to suffer” is often quoted in Indian courts, even though it stands contrary to the realities of criminal justice system in India, which has failed to elaborate a coherent legal mechanism that would explain what should be done for those who have been wrongly convicted.¹

The delays across the system are primarily because of severity of this crisis. Historical data from Law Commission shows that more than 25 percent of under trials are in custody for a year & eventually are acquitted, while court figures indicate the existence of pending appeals in High Courts for more than ten years. Behind the statistics, there lie paused lives, families left in economic devastation & severe psychological distress that an acquittal order cannot solve. While wrongful conviction directly violates Articles 20, 21 & 22 of Constitution, the absence of a codified and standardized framework makes sure that justice is still a rare exception rather than a mandatory process.²

The paper advocates that Indian legal system is not capable of providing timely, full & equal compensation to victims of a miscarriage of justice due to the ad-hoc nature of remedies available, poor procedural provisions & human rights commissions operating in a way that is more discretionary & advisory. In the course of analysis of significant Supreme Court judgments, the 277th Report of Law Commission, as well as of legal system of UK & US, this paper sheds light on cost of absence of intervention on behalf of the legislative branch of India.

RESEARCH OBJECTIVES & METHODOLOGY:

The paper adopts a doctrinal framework & employs comparative legal analysis to fulfil four objectives: to chart available Indian remedies against wrongful action of state, to evaluate the remedies in light of India's obligations under international law & common law systems, to synthesize the salient features of the Law Commission's 277th Report & make some recommendations for Indian statute to be introduced in near future.

¹ See William Blackstone, 4 Commentaries on the Laws of England 358 (1769).

² Law Commission of India, Report No. 277, Wrongful Prosecution (Miscarriage of Justice).

LITERATURE REVIEW:

The academic literature on wrongful conviction in India has grown significantly since release of 277th Report by the Law Commission & distinguished wrongful conviction from wrongful prosecution & wrongful detention. *Kent Roach* claims that it is important to look into wrongful prosecution in India because of the country's enormous number of under trials. However, he takes issue with the suggestion of Law Commission to file cases before newly established special courts since cases filed there call for proof of malice. He recommends that regular courts approve claims on the basis of lesser standard of systemic negligence.³

Other scholars are more concerned with realities of current legal setting. Research studies conducted by scholars in 2024-25 emphasize that in absence of a specialized statute, the issue of compensation largely depends on judiciary's decisions. In addition, India's formal reservation concerning ICCPR concerning wrongful detention gives the government the right to treat compensation as its goal.⁴

According to case studies & policy literature, compensation reform is linked to fundamental structural issues like inadequate forensic infrastructure, excessive reliance on confessions, & lengthy pre-trial detention. Commentators claim that proposed Special Courts will result in ineffective courts that lack the resources and trained judges unless adequate funding and training are provided. Additionally, the research results show a strong need for structured, non-monetary rehabilitation assistance for victims and their families instead of simple compensation payments. Some previous attempts to implement social policies like the Malimath Committee (2003) have established victim compensation funds through procedural laws but focused exclusively on victims of more traditional crimes without proper definitions of state crimes.⁵

³ Kent Roach, *Wrongful Convictions, Wrongful Prosecutions and Wrongful Detention in India*, Nat'l L. Sch. India.

⁴ Eleen Garg, *The Lost Right to Compensation of Wrongfully Convicted Victims: A Critique*, Lawctopus Academike (Oct. 31, 2020).

⁵ Ministry of Home Affairs, Government of India, *Committee on Reforms of Criminal Justice System 1–10* (Justice V.S. Malimath, Chairman, 2003).

THE INNOCENT BEHIND BARS: DECONSTRUCTING WRONGFUL CONVICTIONS:

Before moving on to the evaluation of possible legal remedies, it is important to understand what is "wrongful conviction." The phrase is often misused to refer to any conviction that has later been overturned. In its 277th Report, Law Commission of India makes a clear distinction between three types of damage that overlap, but can still be treated separately:

- Wrongful Conviction: An individual has been convicted by a court and offered punishment but the conviction is later overturned.
- Wrongful Imprisonment or Detention: An individual has been deprived of his/her freedom during the process of trial regardless of whether he/she will be convicted or not.
- Wrongful Prosecution: Police or prosecutorial misconduct or the committing of any other unlawful act is committed against a person who is taken through the criminal trial process, regardless of the outcome.⁶

Worldwide, these injustices fall under the term "miscarriage of justice." Article 14(6) of the ICCPR binds states to replace convicted people whenever they are acquitted because of a new fact proving that miscarriage. While India has ratified the ICCPR in 1979, India still has not put in place any domestic laws in this regard. The Law Commission pointed to failure of the institutions in place in this respect for a country constitutionally committed to individual liberty.⁷

It is important to draw distinctions between these categories since they involve different standards of proof. A person who sufficiently proves their indisputable factual innocence thus has a clear moral right to compensation. A person who has been acquitted after a long period of pre-trial detention finds themselves in a more difficult situation since their acquittal could derive from prosecution's failure to prove their guilt rather than having been confirmed innocent by a court.⁸

CONSTITUTIONAL REMEDIES: ENFORCING FUNDAMENTAL RIGHTS & STATE LIABILITY:

⁶ Utkarsh Anand, Right to Compensation, ForumIAS (June 15, 2022)

⁷ Wrongful Conviction in the Indian Criminal Justice System, Int'l J. Novel Rsch. & Dev. (Mar. 2023),

⁸ Rahul Sagar & Utsav Chandrappa, The Impact of Wrongful Convictions on Victims and Their Quest for Justice (Oct. 10, 2023)

In absence of any relevant statute, Supreme Court of India improvised a compensation scheme based on Articles 21 & 32 of the Constitution. This initiative was taken in landmark case of *Rudul Shah v. State of Bihar*, which involved a petitioner who had spent fourteen years behind bars even after being acquitted by court due to negligence in administrative work. The Court noted that right to life & liberty granted by Article 21 would become meaningless if Court only ordered release of the victim but did not address the injustice that has been done to him. As a result, Court awarded an interim compensation of ₹35,000 when the Court recognized that a writ petition is not an adequate substitute of the fundamental principles of civil law in terms of awarding proper compensation.⁹

The public law remedy evolved & developed over the years:

Bhim Singh v. State of Jammu & Kashmir (1985): In this case, the Court awarded exemplary damages to a legislator unlawfully imprisoned with a view to preventing him from voting. This judgment explicitly established that wrongful use of police powers calls for a punitive measure to be taken through law.¹⁰

Nilabati Behera v. State of Orissa (1993): the case is related to custodial death, the Court held that compensation under Articles 32 & 226 is a remedy provided under public law, based on the doctrine of strict liability. The Court made it clear that it is distinctly separate from any claims arising under tort law, as the doctrine of sovereign immunity has no application in the case of infringement of fundamental rights.¹¹

D.K. Basu v. State of West Bengal (1997): The Court laid down procedural safeguards against arrest, making it mandatory to follow such procedures. The Court also stated that monetary relief is sometime the only effective remedy available to give relief against infringement of Article 21.¹²

Sube Singh v. State of Haryana (2006): The Court has made it clear that this jurisdiction of the Court must be used carefully and only when there are established violations of a serious nature such torture or death.¹³

While this shows a strong constitutional commitment to right of personal liberty, it also shows the inherent weakness of a remedy that is created in court. Compensation by this way is done bypassing the named procedure of statutory nature. It has turned compensation to public law

⁹ Rudul Shah v. State of Bihar, AIR 1983 SC 1086 (India).

¹⁰ Bhim Singh v. State of J. & K., (1985) 4 SCC 677 (India).

¹¹ Nilabati Behera v. State of Orissa, AIR 1993 SC 1960, 1966–67 (India).

¹² D.K. Basu v. State of W.B., (1997) 1 SCC 416, 435–36 (India).

¹³ Sube Singh v. State of Haryana, (2006) 3 SCC 178, 192–93 (India).

in a dramatic exception rather than turning it into a right that can be claimed & applied by everyone. Being not accessible to everyone, it is available to those who have a rare chance to present their cases in courts. The calculation of such remuneration is very unstable. As it is stated in *Rudul Shah*, such work mostly like an instant remedy, rather than like a carefully considered assessment of economic losses, loss of reputation, or psychological damages.¹⁴

THE STATUTORY VACUUM: PROCEDURAL CODES & HUMAN RIGHTS ACT:

There is a common misconception that Indian criminal procedure has an effective mechanism for providing compensation for wrongful actions carried out by the state. However, in reality, the provisions in this regard are inadequate. For instance, the Criminal Procedure Code, 1973 allowed a magistrate to provide a nominal compensation of rs. 100 to a person who was wrongly arrested. Although this was provided for in subsequent legislation called *Bharatiya Nagarik Suraksha Sanhita*, 2023, the maximum sum of 1000 under Section 399 of new legislation is still a small compensation amount. Scholars argue that it is completely out of sync with the economic realities of the modern world & is not repaying even the logistics expenses incurred by the victims, let alone accounting for losses from ruined career or inflicted traumas due to wrongful imprisonment. Most importantly, these sections were created with the purpose of punishing ordinary people who abuse the legal system in an unjust way while providing no mechanisms for addressing peoples' grievances against law enforcement bodies & prosecutors. The alternative legal process provided by Protection of Human Rights Act, 1993 also has limitations in terms of its implementation¹⁵. The NHRC is given the authority to investigate such matters as unlawful arrests or unjustified detentions. However, regarding its function, it can only provide recommendations. The NHRC can recommend to state governments that they provide compensation to victims such as in the case of *Machal Lalung*, who had fourteen years in custody in Assam without ever being tried. However, NHRC does not possess any power of coercive authority in making it happen. In addition, the amount of compensation NHRC suggests is not based on any objective legal standard, it is made based on ad hoc decisions in every case.¹⁶

¹⁴ Judicial Remedies and Constitutional Safeguards for Victims of Wrongful Conviction in India: An Analysis, 4 *Indian J.L. & Legal Rsch.* 36 (2026).

¹⁵ Protection of Human Rights Act, 1993, § 12, No. 10, Acts of Parliament, 1994 (India).

¹⁶ See discussion of the *Machal Lalung* case in SC To Review 7/11 Verdict: Why India Must Pay for Years Lost in Prison, *The Quint* (Aug. 17, 2025).

As a result, the lack of legislative action compels the legal system to function according to the Law Commission of India, which described the situation as operating as ex-gratia instead of a legal requirement. Ex-gratia payments can be revoked or delayed without granting the victims any right to complain. The BNSS recodification of 2023 is a massive missed legislative opportunity since the Parliament chose to ignore the Law Commission's Report 277 after having it for many years & as a result, essentially left the issue of individual liberty unaddressed.

THE 277th REPORT OF THE LAW COMMISSION: ITS FINDINGS NOT USED:

In 2017, the Delhi High Court reached a critical point with regard to the issue of the lack of any laws concerning assistance to victims of wrongful prosecution in the case of *Babloo Chauhan @ Dabloo v. State (NCT of Delhi)*. The court noted that no law existed to address the issue and referred it to the Law Commission of India for consideration. The Commission, which was headed by Justice Dr. B.S. Chauhan and which consulted senior lawyers, investigators & the laws of other countries, submitted the 277th Report titled Wrongful Prosecution (Miscarriage of Justice): Legal Remedies to the government in August 2018.¹⁷

The Report proposes that the legislature should enact a specific provision of law by way of procedural amendments to formally create the right to compensation. Specifically, the Commission proposed a dual remedy system which included both monetary & non-monetary compensations. On one hand, monetary compensation is aimed at addressing the economic loss suffered, while non-monetary compensations, such as state-funded mental and psychological counselling, mental health facilities, and vocational training are regarded as extremely important in helping the individuals adapt back to the society that has gone on without them. The Commission specifically used "wrongful prosecution" as the legal standard for this purpose, which has a narrow interpretation that excludes cases where the accused contributed to the prosecution. This limited focus was chosen in order to avoid over-inclusiveness, for example, compensating individuals who were declared not guilty on trivial grounds as well as under-inclusiveness in which individuals who have suffered abuses of legal system will be excluded.¹⁸

The suggestion of report involved assigning a Special Court to every district. This decision was made to avoid forcing victims through the usual court system, which is overcrowded, making

¹⁷ Babloo Chauhan @ Dabloo v. State (Govt. of NCT of Delhi), 2018 SCC OnLine Del 6884 (India).

¹⁸ Law Commission of India, *Report No. 277: Wrongful Prosecution (Miscarriage of Justice): Legal Remedies* (2018).

the victims wait for years for any resolution. The Report also gave directions on determining the amount of compensation. It states that judiciary should take into account the detention period, financial losses, humiliation suffered & seriousness of the crime committed during its analysis of victims' complaints. In order to make certain that accountability can be maintained even after all the system delays, it has been stated in the Report that not only victims but also their heirs or representatives can file complaints after death of victims¹⁹.

After a gap of over seven years, the proposed legislative initiative is sadly still inactive with the document lying idle in archives of concerned ministry. Parliamentary records have revealed that the Ministry of Law & Justice has received the Report from the Ministry of Home Affairs & forwarded it to State governments & Administrations of Union Territories as required by the fact that criminal law is in the Concurrent List as per Seventh Schedule. No further legislative moves have been made. Attempts to file a public interest litigation in the Supreme Court seeking immediate implementation orders have also failed. Thus, the absence of law as pointed out by Delhi High Court continues to remain uncorrected even in the new decade. This is an example of where a completely developed legislative plan has become a victim of bureaucracy.²⁰

COMPARATIVE PERSPECTIVES:

The dependence of India on random judicial pay-outs stands in clear contrast to other common law countries that have moved from arbitrariness to certainty. In UK, Section 133 of Criminal Justice Act 1988 converts compensation from being a discretionary act to a compulsory obligation. Once it is established that a miscarriage of justice has occurred following the emergence of a newly discovered fact, compensation is required to be paid by state. An independent assessor decides the compensation amount which can be as high as a sum in the millions, with amounts going up depending on the time spent in prison (for more than ten years).²¹

However, UK's model comes with a caveat as political developments and judicial decisions such as R (Adams) have tended to restrict the concept of a miscarriage of justice. The standard of proof for a victim is quite high now as one has to prove his absolute innocence & not just

¹⁹ Id.

²⁰ Kent Roach, Wrongful Convictions, Wrongful Prosecutions and Wrongful Detention in India, Nat'l L. Sch. India.

²¹ Miscarriage of Justice Application Service (MOJAS) Claims Management Information, GOV.UK (Apr. 25, 2024).

point out the unfairness of trial. According to critics, this would mean that one of the most prominent group of victims such as Guildford four would have not received compensation under this harsh standard. Nevertheless, there are undeniable strengths of UK approach that can provide a solid guideline.²²

The approach of the United States is distinct & localized when it comes down to wrongful convictions. By the year 2026, thirty-eight states & federal government set up wrongful conviction statutes. The most remarkable of these statutes is Texas because of law being passed after the subsequent release of Timothy Cole. The framework provided an amount and it made sure that they understood that it was not about money but that the person must be compensated for life. The individuals have been awarded the amount of money for every year spent in prison, with annuity for life and emergency funds, along with tuition and health care provision. It is also worth noting that the Innocence Project helped support that humane attitude, arguing for the setting of a minimum amount worth fifty thousand dollars per year & calling the attention of the policy-makers to the victims who could not refuse false confessions under pressure.²³

The American experience serves as a cautionary lesson for Indian lawmakers. Many states in the USA punish people, who somehow “contributed” to their wrongful convictions thus excluding the people with severe vulnerabilities from receiving the compensations. Additionally, information accumulated by the National Registry of Exonerations highlights an irritating case of geographic lottery because the burden of evidence varies from a simple balance of probabilities in one state to an extremely demanding requirement of "clear and convincing evidence" to prove innocence in some other state. The message for India is very simple, compensation should be an efficient, compassionate & unambiguous form of law that prevents any loophole from making a victim a victim again.²⁴

ILLUSTRATIONS:

The abstract rationale for the necessity of rigorous legislative reform comes to life in a string of horrifying events that keep stirring up in the courts of India. In 2018, the Supreme Court nullified the case filed against *S. Nambi Narayanan*, an ex-scientist of the Indian Space Research Organization (ISRO). He was a victim of trumped-up espionage charges made against him in 1994, which ended up driving him from one jail to another and ripping his life apart by

²² Christina Herrod, *Wrongful Conviction: Leading Factors and Compensation Policies* 5 (2016) (Honors Projects, Grand Valley State University).

²³ National Registry of Exonerations, *Compensation: State Statutory Compensation* (Mar. 2026).

²⁴ *Compensating Exonerees in the United States*, Duke Wrongful Convictions Clinic (Dec. 2024).

what the very Court referred to as indescribable hardship and unparalleled trauma. Although the Supreme Court awarded him with an indemnity of fifty lakhs and ordered the investigation of the police officers who were guilty of those violations, the entire process took almost twenty-five years.²⁵

More recently, the acquittal of the accused in high-profile case of bombings in Mumbai train station in 2006 demonstrated the tragic effects of judicial malfeasance. The accused were almost two decades behind bars before they were found innocent, and their plight has become a classic example of how flawed police investigation, torture during custody, and inept prosecution can ruin a person's life. Although the situation surrounding these people is very serious, immediately after they have been set free there is a serious obstacle in the way to their being compensated. There is no law allowing them to convert their innocence into monetary compensation.²⁶

Furthering judicial worries in the case of *V. Senthil Balaji v. Deputy Director*, the Supreme Court stated that being sentenced to imprisonment for a long time for prosecution which turns out to be false is a serious infringement of the right established in Article 21 of Constitution. In this ruling, court invited lawmakers to take action with regard to realization of the necessity for compensation payments in such cases.²⁷

WHY JUDICIAL COMPENSATION ALONE CANNOT SUBSTITUTE FOR A STATUTE:

The current constitutional remedy, although it has made great strides since the landmark case of Rudul Shah, is not capable of being a permanent substitute for enacted legislation, as access to courts is essentially dependent on the availability of resources, awareness of law & education. The people most prone to wrongful prosecution are from economically & socially deprived sections of society. The lawful remedy, where one has to move to either High Court or Supreme court, will always be practically inaccessible to majority of innocent victims. For a right to be of any significance, it has to be decentralized and structurally feasible rather than

²⁵ See discussion of the Nambi Narayanan case in The Quint.

²⁶ *All Accused Persons in 2006 Mumbai Train Blasts Acquitted: Inside Bombay HC Ruling*, SCC OnLine Blog (July 23, 2025).

²⁷ *V. Senthil Balaji v. Deputy Director, Directorate of Enforcement*, (2024) SCC OnLine SC (India).

being available only in the higher clans of the judiciary that requires expensive legal procedures.²⁸

Moreover, the amount of compensation given by courts under Article 21 jurisprudence has never been based on a consistent & rational method. It is a common practice of High Courts or of Supreme Court to grant compensation of a few hundreds of rupees or lakhs of rupees, without explaining any clear legal or mathematical basis to the judgments. The adoption of a solid legislative basis would turn this irregular practice into a reasoned implementation of laws based on objective criteria. By incorporating such elements into a statute as length of detention, established loss of income, harm to social reputation & expense of medical treatment, it will be possible to ensure that victims who undergo similar experiences will be treated in a uniform manner.²⁹

Moreover, the problem of constitutional remedies is that they only deal with the immediate illegality of imprisonment, failing to assist a person in moving on with his life. Various types of non-material compensation, e.g. government-sponsored job training, long-term psychological support & systemic help in finding housing or work, are not a part of common practices of court. Thus, an ordinary acquittal can help the person get rid of his prison sentence, yet his arrest still leaves a mark on person's life. The effective legislative framework can fill this gap by requiring the application of social rehabilitation measures to help State make up for the harm done.

In conclusion, it is impossible for judicial remedy to provide complete accountability for state's wrongdoing. When a court orders damages, funds come from the treasury under the taxpayer's money, without a trace of the culprit. Such a lack of individual accountability & individual agency does not provide the necessary deterrent effect against future occurrences of wrongful prosecution. One possible legislative solution would be to tie victim compensation to institutions' accountability mechanisms, thus allowing the government to get back its costs from the guilty party & effectively clearing a victim from legal consequences after discharge.³⁰

²⁸ Dr. Surender Kumar, *Compensation for Wrongful Convictions: Analysing the Adequacy and Fairness of Legal Frameworks*, 2 Int'l J. Legal Research & Analysis 8 (2025).

²⁹ Manoj Kumar Sinha, *Compensation for Victims of Miscarriage of Justice: An International and National Perspective*, 51 J. Indian L. Inst. 351 (2009).

³⁰ Udai Yashvir Singh & Smita Singh, *Right to Compensation for Wrongful Prosecution, Incarceration, and Conviction: A Necessity of the Contemporary Indian Socio-Legal Framework*, 4 Int'l J. L. Mgmt. & Humanities 435 (2021).

RECOMMENDATIONS:

The author recommends for future legislative framework which must be based on use of legal pillars be it as a separate law, or as a chapter in Bharatiya Nagarik Suraksha Sanhita, 2023. The first requirement of the proposed law is to differentiate between wrongful prosecution, wrongful incarceration & wrongful conviction, instead of confusing them for each other. The law should use the definition of wrongful prosecution defined by the Law Commission as the main point regarding the basis of recovery while introducing a lower negligence-based benchmark for pre-trial detention cases to protect under trial prisoners.

Secondly, the system needs to create special courts or to give existing district courts special powers to ensure that all petitions are dealt with in compliance with time limits set by law, ideally within one year from their submission. In order for them not to have same problems as any other civil courts, they have to have their budget & administrative support. Thirdly, the levels of compensation have to be determined with the help of legislative provisions, which includes, first of all, length of detention, lost income, damage to reputation, psychological suffering & the necessity to provide for an advance compensation in order to make it possible for people seeking damages to survive while waiting for their claims to be satisfied.³¹

Fourthly, taking a vital lesson from the America into account, it is necessary that law guarantees the protection for vulnerable individuals in the sense that a previous guilty plea or confession should not disqualify the claimant if it will later be proven that the confession was the result of coercion and threats or lack of suitable legal representation. Lastly, the law must not simply focus on monetary payments but should instead require non-monetary measures for the provision of financial assistance, from the payment of state-funded counselling services and mental health services to vocational training and automatic expungement of criminal records.

To sum up, it is necessary that a law fills in the gap between compensation & deterrence by ensuring that there is a mechanism of independent oversight, possibly under National Human Rights Commission, to deal with & take action against investigating officers & prosecutors that have demonstrated malice or gross negligence, thereby ensuring that they are dealt with administrative or legal action. Since criminal procedure is included in Concurrent List, the Central Government must take charge of the situation & come up with a proper law that all

³¹ Saurabh Anand, *Miscarriage of Justice and the Mechanics of Compensation: Analysing the Indian Criminal Justice Schema*, 9 Nat'l L. Sch. J. 112 (2020).

states can adapt in accordance with their own administrative structure and capacity, rather than letting it sit with the Law Commission forever.³²

³² Assessing India's Criminal Procedure Reforms Through the Lens of Wrongful Convictions, *Int'l J. All Rsch. Educ. & Sci. Methods* (2026).

CONCLUSION:

Article 21 guarantee right of life & personal liberty which has been interpreted to include right to get compensation in the event that life or liberty is taken away wrongly by the State. But an implicit constitutional right decided in each individual case by the discretion of separate Benches cannot be equated with a statutory right that every wrongly tried person can invoke as a matter of course. It is this gap between the two situations where India today is rich in judicial pronouncements & academic commentaries but poor in legislative action.

In 2018, Law Commission of India undertook the challenging task of constructing a workable statutory framework, taking insights from other countries like United Kingdom & United States. Then providing a Bill to discuss in Parliament. What is missing after this is not analysis but rather political will. Each year that goes by without legislative response adds to the long list of people who suffered injustice starting from Machal Lalung, who lost fifty-four years to Nambi Narayanan, who lost his career & reputation, then ended up with people who were acquitted decades after the Mumbai blasts in 2006.