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# The Perils of Unlawful Detention and Arbitrary Arrests

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## ABSTRACT

*Detention by police is the process whereby a state lawfully holds a person by removing their freedom or liberty at that time. The detention period becomes highly sensitive as it curbs the personal liberty of an individual, thus it assumes far grave importance to ensure that it isn't misused on arbitrary terms by the state actors. Police actions and their accountability for the same play an important role here as 'illegal detention' is the unsubstantiated imprisonment or unlawful deprivation of liberty of an individual by arresting for an illegitimate cause or suspicion, along with continuous restraint on one's liberty by detaining such individual in custody. Since it has been held so that Personal liberty is of paramount consideration, this paper aims to take in factors and reasons that have led the judicial system to where it is now. As India tries to present and implement reforms to its poor custodial set up, it is important to take in cognizance of the fact the police in India have deep-rooted issues of acting lawlessly and arbitrarily since almost its inception. This paper will dive deep in discovering and understanding this discourse through the consequent events in the history and try to the face the question – what happens when the organization which is in place to protect us instead runs amok and is not kept duly in check leading to rampant disorder, discrimination and subsequently affecting the functioning of our judicial system rendering it to be biased and ineffective in curbing crimes.*

**Keywords:** *Detention, Arbitrary Arrests, Custodial torture, Rights, Habeus Corpus.*

## I. INTRODUCTION

This research paper primarily centres around the research question-

***Does Unlawful detention and arbitrary arrests of citizens render our judicial system to be biased and ineffective in curbing crimes?***

Detention by police is the process whereby a state lawfully holds a person by removing their freedom or liberty at that time. It is the period when the person is waiting to be brought in front of a magistrate on formal charges, or is waiting for a trial and is unable to secure bail.

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Article 21 of the Constitution of India declares that “no person shall be deprived of his life or personal liberty except according to the procedure established by law”. ‘Illegal detention’ is the unsubstantiated imprisonment or unlawful deprivation of liberty of an individual by arresting for an illegitimate cause or suspicion, along with continuous restraint on one’s liberty by detaining such individual in custody. A sound understanding of the law governing detention is imperative as *the majority of torture and ill-treatment in the Indian criminal justice system occurs during the first stage of detention in police custody.*

Unlawfulness and subsequent distrust in the law and order bodies seems to be a major problem of the Indian police. Examples of complaints about misbehavior, mala fide practices, and unlawful action can be found in the media, in scholarly writing, and in Jurisprudence. The colossal and arbitrary power provided to the Police is the fundamental reason behind the menace of arbitrary detention. Personal liberty is of paramount consideration. Any deprivation of this, however, short or temporary has to be justified.

The issue of police brutality is startling. Custodial violence by police is a widespread problem in India. Torture and ill-treatment of detenus of any kind, whether physical or psychological and deprivation or other attempts to induce statements or confessions, is strictly prohibited yet it exists in India. It is self-evident that, without an efficient guarantee of the liberty and security of the human person, the protection of other individual rights becomes increasingly vulnerable and often illusory.

The paper will be divided into two parts with the first part dealing with the notion of preventive detention, arbitrary arrests and the role of the magistrate. The second part will deal with the gross misconduct of the detention laws by police officers.

### **(A) Hypothesis**

*“Unlawful detention and arbitrary arrests adversely affect the functioning of our judicial system.”*

## **II. PREVENTIVE DETENTION, ARBITRARY ARRESTS AND THE ROLE OF THE MAGISTRATE**

Arrest and Detention in common parlance, the words respectively mean the seizure and confinement of a person by a valid authority. The United Nations study on the subject has, however, clarified the position and has defined these words as follows: Arrest has been said to be the act of taking a person into custody under the authority of law or by compulsion of another kind and includes that period from the moment he is placed under restraint up to the time he is

brought before an authority competent to order his continuous custody or to release him. Detention was said to be the act of confining a person to a certain place whether or not in the continuation of arrest, and under restraint which prevents him from living with his family or carrying out his normal occupational or social activities.

The general law of arrest and detention under the Indian law is laid down under the Criminal Procedure Code of 1898. According to this Code, an arrest can be made only in respect of the commission of an offense and in pursuance of a warrant of arrest issued by a court exercising jurisdiction under the provisions of the Code.<sup>2</sup> The procedure for the issuance of such warrants are laid down in the Code itself, which provides that the persons to be arrested must be charged with some offense, and the warrant should mention the reasons for the arrest and should contain a clear accusation against the person sought to be arrested.

In the landmark judgment of *Maneka Gandhi v. Union of India*, the Supreme Court of India held that, “The procedure established by law which affects the liberty of a citizen must be right, just and fair and should not be arbitrary, fanciful or oppressive and that a procedure which doesn’t satisfy the said test would be violative of Article 21 of the Constitution.”

Article 22, clause (1) of the Constitution of India, provides that “No person who is arrested shall be detained in custody without being informed, as soon as may be, of the grounds for such arrest nor shall he be denied the right to consult, and to be defended by, a legal practitioner of his choice”. Clause (2) of Article 22 lays down that “Every person who is arrested and detained in custody shall be produced before the nearest magistrate within 24 hours of such arrest excluding the time necessary for the journey from the place of arrest to court of the magistrate and no such person shall be detained in custody beyond the said period without the authority of a magistrate”.

The safeguards provided for under Article 22 are however not available to enemy aliens and persons detained under any law providing for preventive detention such as the Preventive Detention Act, 1950, which though originally passed for only one year, has come to stay up to the present day with certain modifications. The object of preventive detention is to prevent an individual from doing something prejudicial to the defense, security, and foreign affairs of the nation, or to the security of any state in India, maintenance of public order, or supplies and services essential to the community.

The provisions relating to arrest are primarily dealt with in chapter 5 of the Code of Criminal

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<sup>2</sup> *Provisions against Arbitrary Arrests in India - LexForti* , <https://lexforti.com/legal-news/provisions-against-arbitrary-arrests-in-india>

Procedure, 1973. Section 41 of this Code mainly deals with the situations when a police officer may arrest without a warrant. Most of the arbitrary detentions are generally made under this section as the power assigned to the Police under this section is colossal. This is pertinent to note what the 'Law Commission of India' observed in its 177th report on 'Law relating to arrest.' It observes that "Arrest of a person without a warrant and an order from a Magistrate seriously invades the liberty of a citizen.<sup>3</sup> In case of an arrest under a warrant, a judicial authority has applied his mind to the facts and circumstances of the case whereas, in a case of an arrest without warrant by the police, and the matter rests more in the realm of the police officer's subjective satisfaction."

A magistrate has to see the compliance of provisions of Sections 56 and 57 of Cr.P.C. The Magistrate is the authority to see that there should not be any unnecessary arrests and also abuse of power and process. The police are supposed to produce the arrestee within 24 hours as per Sections 56 and 57 of Cr.P.C. and Article 22 of the Constitution of India. The police officer who fails to comply with this rule is guilty of the offense of illegal detention. The Magistrate has to take note of that and act on it.

The Magistrate should ask the accused if he has been ill-treated, tortured, or abused in the custody. He should not forget that he is performing the judicial function at that time. If the Magistrate suspects, the accused were ill-treated or tortured or abused in the custody, he can record the statement of the accused. He should see that the police are not present at the time of recording of the statement. The Magistrate must see that the accused person can communicate freely to him without any threat or intimidation. He should see the accused as he should be free to express his grievances to him. Even though the Magistrate is overburdened with the work, he should not forget that he is dealing with the liberty of the human being at the time of remand. Therefore, he has to follow the law laid down at the time of remand.<sup>4</sup>

The Constitutional provisions regarding arrest and detention guaranteed under Article 22 of the Constitution could be interpreted in favour of state action, deviating from the language used.<sup>5</sup> This also poses a huge issue, as often it is seen, the police's account and their part of the ordeal are given preference and legitimacy. This leads to gross misuse of power and unlawful precedent for future cases. However, arbitrary cannot exactly be substituted with 'illegal'. The arbitrariness of action is not only limited to illegality but it's also unjust and incompatible with

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<sup>3</sup> *Blogger - rock news*, <https://dailynewscanvin.blogspot.com>

<sup>4</sup> M.Raju, *Role Of The Magistrate Against Illegal Detentions*, July, 2020

<sup>5</sup> *NEAREST MAGISTRATE IN ARTICLE 22 OF THE CONSTITUTION*, <http://www.ijtr.nic.in/articles/art30.pdf>

the principles of natural justice and human dignity.<sup>6</sup>

### III. GROSS MISCONDUCT OF THE DETENTION LAWS BY POLICE OFFICERS

Custodial death is one of the worst crimes in a civilized society governed by the Rule of Law.<sup>7</sup> In India where rule of law is inherent in each action and right to life and liberty is prized fundamental right adorning highest place amongst all-important fundamental rights, instances of torture and using third-degree methods upon suspects during illegal detention and police remand casts a slur on the very system of administration. Custodial torture is universally held as one of the cruellest forms of human rights abuse. The Constitution of India, the Supreme Court, the National Human Rights Commission (NHRC), and the United Nations forbid it. But the police across the country continue to defy these institutions.

Nothing exemplifies torture in India than the deaths in police and prison custody and despicable detention conditions which are totally incompatible with human dignity and amount to torture and other cruel, inhuman or degrading treatment or punishment. Asian Centre for Human Rights (ACHR) in its report, released on June 26, stated that a total of 1,674 custodial deaths, including 1,530 deaths in judicial custody and 144 deaths in police custody, took place from 1 April 2017 to 28 February 2018. This means that on average there were about 5 custodial deaths per day in the aforementioned period. The numbers are startling. A report by a consortium of NGOs against custodial torture has released a report in which they say 1,731 people died in custody in India during 2019.<sup>8</sup> This works out to around five custodial deaths a day. when it comes to "gang dacoity" or "terrorism", fake encounters as well true encounters often seem to be the easiest device to earn rewards and recognition for the police officer. It seems to be widely believed amongst the police officers that the only effective strategy to deal with criminal and extremist violence is to "overcome" inadequacies and loopholes in the laws and procedures that govern criminal trials. Some police officers are downright known as "encounter specialists". The arrest of a person should only be governed by public interest and the actual requirements of an investigation and not by a "mere desire of the police to show off their power". The public fear of police essentially stems from the fear of an arrest by the police in some connection or other.

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<sup>6</sup> *Provisions against Arbitrary Arrests in India - LexForti*, <https://lexforti.com/legal-news/provisions-against-arbitrary-arrests-in-india>

<sup>7</sup> *CUSTODIAL DEATH – The Legal Murder*, <https://www.mootcourtsocietypgcl.com/post/what-you-need-to-know-about-the-new-johnson-law>

<sup>8</sup> Admin, *India Records Daily Five Deaths In Custody, Uttar Pradesh Tops Deaths In Police Custody During 2019, NATIONAL CAMPAIGN AGAINST TORTURE*, (Sept.02,2021, 1:02pm) <http://www.uncat.org/press-release/press-release-india-records-daily-five-deaths-in-custody-uttar-pradesh-tops-deaths-in-police-custody-during-2019/>

In 2011 the SC, regarding *D.K. Basu v. State of West Bengal* summarized with most obvious discontent: "Policemen must learn how to behave as public servants in a democratic country, and not as oppressors of the people." The fact remains that torture and beating up suspects to extract confessions have become very much part of policing in India. In several cases, the police made all attempts to destroy incriminating evidence of torture by not conducting post-mortems or cremating the dead bodies of the torture victims in haste without conducting mandatory post-mortem examinations.

The use of illegal means to produce evidence and to obtain confessions is commonly referred to as the "third-degree" method. In *Joginder Kumar v. State of Uttar Pradesh*, the SC pointed out that because "arrest and detention in police lock-up of a person can cause incalculable harm to the reputation and self-esteem of a person", no "arrest can be made because it is lawful for the police officer to do so. The existence of the power to arrest is one thing. The justification for the exercise of it is quite another."<sup>9</sup> A person is taken into arrest by the police finds themselves in a very vulnerable position, which the National Police Commission (NPC) appropriately betokens as the "trauma of arrest". According to the Commission's findings, legal provisions granting discretionary power of arrest to the police, which might be unavoidable in general, lead to corruption and malpractices.

Again in *D.K. Basu v. West Bengal* the SC raised the point: "Custodial violence, including torture and death in the lock-ups, *strikes a blow at the Rule of Law*, which demands that the powers of the executive should not only be derived from law but also that the same should be limited by law. When studying the plethora of SC rulings on police misbehavior and the use of illegal means, there remains little doubt that in many, perhaps most of the cases the victims belong to the poor and marginalized sections of society. Even though changes may have taken place in the police of at least some States, in general, the Indian police are still facing a major problem when it comes to adherence to human and fundamental rights as well as to the rule of law.

On the other hand, because of the widespread perception of a malfunctioning criminal justice system, quite a significant share of the public does not mind when the police resort to illegal means as far as to fake encounters, i.e. extrajudicial killings. The police are encouraged to do the dirty work of society because the criminal justice system is not functioning, and overhauling of the entire administration of justice is too big a task. Death occurring in custody is considered to be an extremely sensitive phenomenon, as the person is solely dependent on the custodial

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<sup>9</sup> *Amarawati And Anr. (Smt.) vs State Of U.P. on 15 October, 2004*, <https://indiankanoon.org/doc/385610/>

authority for all of his constitutional rights including access to health care and it is usually considered as unnatural death by the public at large. As such it creates a hue and cry among the general population and sometimes, causes political involvement.

The death of a father-son duo from Tamil Nadu, on 20 June and 23 June, respectively, allegedly due to custodial violence, sparked anger across India. Custodial violence primarily refers to violence in police and judicial custody. It includes death, rape, and torture. A father and son -P Jeyaraj, 58, and his son Fenix, 38 -running a mobile accessory shop in Sathankulam town in Tuticorin district were arrested by some policemen allegedly for keeping the shop open past permitted hours. Tamil Nadu had at that time imposed a strict lockdown to curb COVID-19. The duo was taken to the police station where, as has been alleged by the family members, they were brutally assaulted. A few days later they were pronounced dead in jail.<sup>10</sup>

A sound understanding of the law governing detention is imperative because the majority of torture and ill-treatment in the Indian criminal justice system occurs during the first stage of detention in police custody. The National Human Rights Commission (NHRC) received torture intimation of one hundred and thirty-six cases of custodial death from State Governments. The conditions in which accused persons are held in India are very poor in general, and they vary greatly depending on the circumstances of detention. Some are held in police lock-ups, and others are detained in prisons. Over 70 percent of India's overcrowded prison population are undertrials, who are yet to face trials.

It is important to note that India is a party to most of the multilateral international treaties and conventions including those on human rights. Being endowed with the responsibility of protecting the rights of her more than five hundred million people, amounting to about one-seventh population of the world, she carries a greater responsibility in the field than any other country.

Torture and ill-treatment of detenus of any kind, whether physical or psychological and deprivation or other attempts to induce statements or confessions, is strictly prohibited. The Indian Government is also committed to following the provisions of the ICCPR, which prohibits torture or cruel, inhuman, or degrading treatment or punishment. India has signed the Convention Against Torture and Other Cruel, Inhuman, and Degrading Treatment or Punishment, which proffers a thorough guideline to effectuate the universal ban on torture.

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<sup>10</sup>Press trust of India, *Jayaraj-Fenix custodial deaths: CBI takes over probe into torture and killing of father-son duo*, *FIRSTPOST*, ( Sept.02,2021, 1:02pm) <https://www.firstpost.com/india/jayaraj-fenix-custodial-deaths-cbi-takes-over-probe-into-torture-and-killing-of-father-son-duo-8574761.html>

The NHRC has also been making an effort to reduce custodial violence by issuing a guideline that any incident of custodial death or rape must be informed to the NHRC within 24 hours of occurrence. When a person is detained, and if there is some reason to suspect that he or she is unsafe in custody or there are no legal grounds for the person's detention, one can file a petition with the appropriate High Court or the Supreme Court of India for a 'writ of habeas corpus

*A writ of habeas corpus* can be filed either by the detained person or by a relative or friend on his or her behalf. The application for a writ of habeas corpus must be accompanied by a report stating the circumstances of the imprisonment. A writ of habeas corpus need not be a formal document. It may be a letter or telegram to the court setting out the circumstances of the detention. An advantage of a telegram is that it is an officially timed and dated document.

Since the Judiciary in cases of police misbehavior infringements of fundamental and human rights often cannot provide for redress in due time, the SC since the 1980s is emphasizing financial compensation for police abuse of powers also as a means of preventing illegal activities and enforcing due compliance with human and fundamental rights by the police in the future. Thus financial compensation to some extent has become a remedy under public law which not only has the function to "civilize public power" but also to assure the citizens that they live under a legal system wherein their rights and interests shall be protected and preserved. However, such compensation has not had any deterrent effect on police officers unless they are personally made liable.

#### **IV. CONCLUSION**

The root cause of arbitrary detention can be understood in terms of an evil correlation between the unguided power of the police and the lack of accountability and transparency in their functioning. Without any stringent reforms, This paper summarises that we won't be able to see any changes in terms of rampant abuse of power by the police authority in our country if and unless a wave of change is brought upon wherein the police authority is seen as an institution looking after the welfare of the society and protecting it. It would not be achieved overnight and would constant and determined work by the institution to better itself all the while taking proactive measures to curb the occurrence of the aforementioned events . As of now, the ground reality is completely different wherein police are seen as a violent, abusive, and torturous institution that is biased and misuses its power and authority to aid an already disruptive judiciary system of our country.

This hampers the effectiveness of our judiciary as cases of dispute due to mistreatment at the

hands of the policing authority never reach the court thus limiting the functioning of the judiciary and often in the long run discrediting the trust of common citizens.

Lord Acton's famous statement that "Power corrupts; absolute power corrupts absolutely"<sup>11</sup> gives us a good opportunity to fathom this ignominious correlation between the unguided power of the police and the unaccountability and the non-transparency in their functioning. The illegitimate consolidation of power creates a harmonious ambiance for arbitrariness to flourish. The lack of transparency and accountability in power provides scope and an opportunity for the power holders to exercise powers arbitrarily and thereafter camouflage their arbitrariness by mutualizing their power, position, and office. So any effort to eradicate this menace of arbitrary detention will have to constitute the process of ravaging this evil engagement of power with unaccountability and non-transparency. In the words of Justice V.R Krishna Iyer, as noted in his book 'Off the Bench' "The rule of law and lively democracy can be sustained only by the laws that govern the police and the police operating strictly within the contours of the corpus juris."

Our judiciary can function effectively when the proceedings at the initial stages are not constituted of imbalance, discrimination and human rights violations. In order to uphold rule of law and equality principles enshrined in our constitution it is important to realise the role played by the police in delivering justice to citizens.

In *Francis Coralie v. Union Territory of Delhi* (1981) and *Sheela Barse v. State of Maharashtra* (1987), the Court condemned cruelty and torture as violative of Article 21, which is consistent with the principles contained in the United Nations Convention Against Torture (UNCAT). Only the people can rise against the torture practices and they have relevant roles to play in bringing about the change we want to see. It is a matter of who decides to pick up the mantle first.<sup>12</sup> But the Magistrate has to play a pivotal role in controlling the illegal detentions of innocent persons and also to protect the fundamental rights of the citizens of India.

Constructive measures have been taken up by the National Human Rights Commission (NHRC) ever since its inception under the Protection of Human Rights Act in the year 1993, its primary endeavour has been to give a positive meaning to the objectives set out in the Act and has thus worked vigorously, to create awareness about human rights and to sensitize public authorities in promoting and protecting the human rights of the people.

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<sup>11</sup> Acton Research, , Lord Acton Quote Archive, *ACTON INSTITUTE*, ( Sept.02,2021, 1:02pm)  
<https://www.acton.org/research/lord-acton-quote-archive>

<sup>12</sup> *The Hindu Newspaper* 03/07/2020 - *THE EXAMS MADE SIMPLE*, <https://temsias.com/the-hindu-newspaper-03-07-2020>

The Manual on Human Rights for the Police Officers, put out by the NHRC in 2010 is a part of its attempt to sensitise the police force, also enhance their response capacity all the while dealing with myriad expectations that they come to face from the enormous democracy that is India. The NHRC in the manual points out that – “ever since its inception- it has been receiving large number of complaints against police for making unjustified, indiscriminate arrests, including implication of innocent persons in false cases. The civil society considers it as a serious assault on human dignity and violation of human rights. It is no longer a supine and meek spectator of the assault on human dignity inflicted in the form of custodial violence”. The acceptance of the role of police by the NHRC and consequently taking cognizance of the fact that the common citizen have the ability to make a change against the redundant practices speaks volumes about how far the movement for a definite reform has come

Yet these reforms are not enough as we see incidents of horrific atrocities continue to send shockwaves across the country. The series of events of torture or lock-up deaths or illegal detention is a sign that a fast-approaching change is of utmost importance and necessity.

Through this journey of learning from the past and working towards betterment in the future it is important to realise that only the common citizens, including the Bar, the media, civil society, and student groups, can rise against torture practices and work together with the institution to bring about a holistic change.

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