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Police Accountability and Public Safety Commissions in Developing and Developed Countries: A Comparative Study of Pakistan, India, and the United Kingdom – Lessons and Best Practices for Pakistan

Muhammad Zeeshan Adhi
Ph.D Scholar at Department of Criminology, University of Karachi, Pakistan
zeeshanadhi@gmail.com

Muhammad Ibrahim
Ph.D Scholar at Department of Criminology, University of Karachi, Pakistan
Ibrahimkhan.cbi@gmail.com

Rozi Ali
Ph.D Scholar at Department of Criminology, University of Karachi, Pakistan
rozialishahid@gmail.com

Dr Naima Saeed
Chairperson, Department of Criminology, University of Karachi, Pakistan
naima.saeed7@gmail.com

ABSTRACT

Police accountability is a vital part of both democratic governance and crowd safety in that it keeps the nation's law enforcement agencies within the scope of the law and ethics. The current study is a comparison of police accountability and public safety commissions in the three countries of Pakistan, India and the United Kingdom. As developing countries, both Pakistan and India are struggling with an enormous number of challenges, including political interference, weak legal regulations, and low levels of popular trust. The UK is a relatively mature case of oversight characterised by independent regulatory bodies and transparent procedures, and citizen participation. This research examines the system of laws, organisational arrangements, the efficacy of the working, and the notion held by the citizens of police control mechanisms in these nations. Analysis of the findings gives the evidence that effective structures, such as the current Public Safety Commissions in Pakistan, have not been utilised because of the absence of political will and the institutional capacity to fulfil them; Police Complaints Authorities established in India (though subject to Supreme Court directives) have faced uneven results in different states. The example of the Independent Office for Police

Conduct and Police and Crime Commissioners in the UK shows how empowered agencies, which are independent in their operations, can be effective in both policing the actions of the Police and regaining civilian confidence. Based on this comparative discussion, the paper suggests major reforms that Pakistan should implement, namely the creation of independent and strong oversight agencies, insulation of the police leadership against political interference, improvement of the complaint process, encouragement of transparency and participation of the community, and the development of alliances with civil society and the media. These steps are essential in building a professional police force that is accountable and upholds human rights, and builds democratically accountable governance. The given study can be regarded as a contribution to the discourse around police reform in developing countries, as it provides context-specific best practices based on the experience of other nations. It puts more emphasis on the political will, legal understanding, and social engagement in the development of police accountability and general safety in Pakistan.
Keywords: Police Accountability, Public Safety Commissions, Police Oversight, Police Reform in Pakistan, Comparative Study

INTRODUCTION

Democracy and police responsibility go hand in hand and form the essential interest in the rule of law and safeguarding human rights. This may lead to systematic mistreatment, loss of civil liberties and loss of trust in law enforcement agencies where the law enforcement has complete impunity. The opinion that the police are obliged to be accountable not only to the government but to the general populace as well is gaining momentum in the contemporary models of governance. Police oversight bodies and commissions are also important in ensuring effective, fair and transparent operation of law enforcement bodies. Nevertheless, these mechanisms are different in terms of the way they are dealt with, established, operational and their effectiveness according to the laws of differing countries, political power, institutional development and their socio-economic environment.

The developing economies, such as Pakistan and India, have had continuous problems with the creation of effective police accountability systems. These are institutional inertia, political intrigues, poor resources and less enforcement of the law. These countries easily contend with the problem of custodial torture, extrajudicial executions, and discriminatory policing, which do not fully agree with the constitutional assurances and the legal back-up of such practices. Reports by organisations such as Human Rights Watch and Amnesty International have repeatedly highlighted these issues in both countries (Human Rights Watch, 2016; Amnesty International, 2021). Conversely, developed countries like the United Kingdom offer examples of relatively robust police oversight systems, where independent bodies such as the Independent Office for Police Conduct (IOPC) and elected Police and Crime Commissioners (PCCs) are mandated to investigate police misconduct and enhance accountability (Home Office UK, 2020).

Pakistan, as part of the Police Order of 2002, commissioned the presence of public safety commissions in order to establish district, provincial, and national level citizen-driven accountability. However, the implementation has been inconsistent and largely symbolic due to political resistance, lack of resources, and legal ambiguities (International Crisis Group, 2008). India's experience with Police Complaints Authorities (PCAs), established following the landmark Prakash Singh case in 2006, has also been marked by similar challenges, such as a lack of enforcement power and state-level resistance (Commonwealth Human Rights Initiative, 2019). The UK experience, in the meantime, exemplifies how independent oversight, enhanced by transparency and participation of citizens, can majorly enhance the extent of trust on the part of the populace and on policing outcomes.

This research is a comparative analysis of the purpose of measuring the structures, effectiveness and challenges of police accountability structures in Pakistan, India and the United Kingdom. It places special emphasis on oversight organisations or public safety commissions to find out lessons that can be customised to another country like Pakistan. The knowledge of what has been successful and unsuccessful in various political and institutional environments can be crucial in devising context-sensitive but effective reform strategies.

The research is driven by the following objectives:

- To look at the legal and institutional perspectives used to regulate police accountability in Pakistan, India, and the United Kingdom.
- To measure the execution and success of there being public safety commissions and such other oversight functions.
- To determine some important variations and similarities in how developing and developed countries give an account of their police.
- To draw lessons and suggest best practices that hold the potential to be implemented in Pakistan, i.e. to enhance police accountability.

Through the comparative perspective of this study, there is hope not only the highlight the failings of the present accountability system in Pakistan but also to offer tangible evidence-based suggestions to the level of reform. It acknowledges that even though there is no universal model that can be transferred everywhere, the values of independence, transparency and engagement with the people are universal. Finally, the research is expected to help in the policy dialogue and reform processes that aim at ensuring that policing in the country is more democratic, accountable and responsive to the needs of the people.

LITERATURE REVIEW

Police accountability is a topic on which there is a large literature and policy debate, especially regarding human rights protection and democratic governance. Accountability in policing can be defined as the method through which police officers/institutions have responsibility for their behaviours, decisions and actions. These mechanisms may be internal (e.g., departmental inquiries), judicial (e.g., courts), or external and independent (e.g., oversight bodies or public safety

commissions). Scholars such as Bayley (2006) argue that effective accountability mechanisms are not just essential for curbing abuse of power but also for ensuring public trust in law enforcement institutions.

Several theoretical frameworks inform the study of police accountability. Principal-agent theory provides a useful lens to understand the dynamic between the police (agents) and the state or citizens (principals). According to this theory, agents may deviate from their mandate unless subjected to monitoring and enforcement mechanisms (Miller, 2005). Another relevant framework is governance theory, which emphasises the importance of multi-actor accountability—including civil society, media, and independent institutions—in ensuring the transparency and effectiveness of public institutions (Bevir, 2011). These theories assist in putting into context the role and the form of public safety commissions in contemporary states.

The literature on developing countries tends to show how the underdevelopment of institutions leads to the failure of police accountability through instances of political interference, lack of well-defined laws, and so on. In the case of Pakistan, studies such as those by the International Crisis Group (2008) and Aftab (2010) underscore how police reforms initiated under the Police Order 2002 have largely failed to take root due to a lack of political will and resistance from entrenched elites. In place of the commissions were planned to be the public safety commissions were planned to protect the police against any form of political interference and also have it under civilian control. However, empirical assessments suggest these bodies have remained largely non-functional, particularly at the provincial and district levels (Aftab, 2010).

The journey of police accountability in India has involved a lot of judicial intervention. The landmark Prakash Singh v. Union of India judgment in 2006 directed Indian states to establish Police Complaints Authorities (PCAs) at the state and district levels to handle complaints of police misconduct. Scholars like Verma (2012) and the Commonwealth Human Rights Initiative (2019) note that while this judicial intervention was groundbreaking, its implementation has been patchy and politically contested. Most PCAs lack the independence, resources, and legal mandate required to function effectively, and many Indian states have either delayed their establishment or diluted their powers through state legislation (Verma, 2012).

The United Kingdom, on the other hand, constitutes a more institutionalised form of policing oversight. The establishment of the Independent Office for Police Conduct (IOPC) and the role of elected Police and Crime Commissioners (PCCs) illustrate how independent, well-resourced bodies can hold the police accountable while maintaining operational autonomy. Scholars such as Savage (2016) and Lister (2019) argue that the UK's approach combines formal legal accountability with a strong culture of transparency and public engagement. The IOPC can have statutory authority to carry out complaints investigations, and they may also encourage police forces to cooperate, thus providing an independent and credible model of accountability. Moreover, the UK's emphasis on community policing and citizen participation in law enforcement decision-making reflects a mature democratic

framework for policing governance.

Comparative scholarship, such as the work of Stenning (2009), emphasises that while the structural forms of police accountability mechanisms may appear similar across countries, their effectiveness is deeply shaped by political context, legal culture, and institutional capacity. As an example, the only presence of a public safety commission or complaints authority does not necessarily mean accountability because unless the said institution is autonomous, powerful and has the confidence of the citizens, then it will not lead to accountability. This is especially the case in Pakistan and India, where the external oversight mechanisms usually work in a hostile political environment and do not exercise enforcement powers.

The role of the civil society and the media in supporting accountability in the police is also vital to mention. In less developed nations, non-governmental organisations, human rights commissions, and investigative journalism can fulfil a vital role of alerting to the mistreatment, and shaming governments to make changes. In the UK, civil society collaborates more directly with police oversight bodies, often participating in consultative processes and helping shape public policy (Lister, 2019). The extent to which this participatory model is non-existent in Pakistan and India, where the civic space is often limited, and law enforcement agencies do not work with the widespread input of people.

In a nutshell, the literature demonstrates a diverse yet unbalanced situation of police accountability models in both developed and developing nations. Although the United Kingdom follows a fairly effective model based on the aspects of legal empowerment and institutional autonomy, in Pakistan and India, there are gaps in its implementation, as well as political interference and people's distrust. Those mechanics are important to comprehend to reinstate the best practices and develop reforms that can be anticipated in a particular context, which is needed in terms of police accountability in a country such as Pakistan.

METHODOLOGY

This study involves a comparative qualitative approach that makes an attempt towards the analysis of the police accountability mechanisms and the presence of the public safety commissions in three countries, namely Pakistan, India, and the United Kingdom. The comparative approach is especially adequate in outlining both the common problematic and the variations in various political, legal and institutional settings. By examining cases from both the Global South (Pakistan and India) and a developed democratic system (United Kingdom), the study seeks to uncover patterns that may inform reform efforts in Pakistan.

The study is facilitated by the research design based on the document approach to the primary and secondary sources. Primary data includes legal texts (e.g., Police Order 2002 in Pakistan, Prakash Singh judgment in India, and UK legislation such as the Police Reform and Social Responsibility Act 2011), policy documents, and official reports from public oversight bodies such as the Independent Office for Police Conduct (UK), the Commonwealth Human Rights Initiative (India),

and the National Police Bureau (Pakistan). The secondary sources will include peer-reviewed scholarly works, the publications of think tanks, media, and civil society evaluations. These publications present information about the structure, functioning, and effectiveness of police oversight in each of the jurisdictions.

The choice of Pakistan, India and the UK is not random and is motivated by a number of factors. Pakistan and India were selected based on their common colonial policing heritage, federalist models and current police reform problems. The United Kingdom is a developed democracy that has developed mechanisms of accountability, and as such, it is a good source of contrast and potential best practices. This tri-country design allows for both horizontal comparison (across systems) and vertical analysis (within each system's design and implementation gap).

To organise the comparison, the study uses a framework where the five dimensions, including legal formation, institutional construction, independence and oversight, public involvement and effectiveness in enforcement mechanisms, have been considered. The dimensions allow an effective evaluation of how police accountability is conceptualised and operationalised in the three countries.

Although the study does not comprise any fieldwork, interviews, and other studies as a result of resource and access constraints, it is guided by the quality desk-based research, as well as a triangulation of the data between various credible sources to achieve reliability and validity.

Country Case Studies

A. Pakistan

There is little doubt that police accountability in Pakistan is an area that is highly contentious and still lacks adequate levels of development within the governance structure of Pakistan. Successive attempts to institutionalise accountability and oversight by the policing system through various forms of legislative interventions, such as the Police Order 2002, have been thwarted all the time by intervention of the political system, implementation weaknesses and bureaucratic sluggishness. The 2002 law superseded the Police Act of 1861, passed during the colonial era and was designed to professionalise the police by proposing new principles of autonomy, transparency and oversight by citizen-led district, provincial and national public safety commissions. But today, over twenty years after the drafting of the Police Order, many of the aims of the document have not been achieved.

The National Public Safety Commission (NPSC) and corresponding Provincial Public Safety Commissions (PPSCs) were designed to act as watchdogs over police conduct, ensure compliance with the law, and handle public complaints. These commissions were supposed to be comprised of a balanced mix of legislators and independent members, with authority to oversee police performance and recommend disciplinary action in cases of misconduct (Police Order, 2002). At the district level, District Public Safety and Police Complaints Commissions (DPSPCCs) were meant to provide citizens with direct channels for redress. These bodies were either dormant or dissolved in the majority of the provinces.

According to scholars and observers belonging to civil society, the politicisation of policing and the reluctance of provincial governments to renounce control have hampered, to a large extent, the establishment of these oversight mechanisms. For example, the International Crisis Group (2008) notes that the shift in policing power from the federal to provincial governments after the 18th Amendment to the Constitution in 2010 has further fragmented accountability frameworks, as provinces have selectively adopted, amended, or ignored the Police Order altogether. Punjab, for instance, reverted to a modified version of the 1861 Police Act in 2013, which effectively diluted the autonomy of the police and eliminated the public safety commissions (International Crisis Group, 2016).

The commissions have lacked independence and capacity, which has been a constant issue. In most situations, the politicisation of appointments is rife within the public safety bodies and even independent members are marginalised or not appointed at all. The commissions usually do not have special budgets, office and investigative resources. Therefore, they just act ceremonially, and little is done by their recommendations. These commissions have not even been able to discipline and put pressure on the police to assist in inquiries, even when they are operational.

The problem of custodial torture, illegal detention, extrajudicial killings, and overall misuse of power by police services is still haunting the law enforcement agencies in Pakistan. The national and international human rights organisations regularly record the existence of these practices. For instance, the Human Rights Commission of Pakistan (HRCP) has reported dozens of custodial deaths annually and has highlighted the failure of internal and external accountability mechanisms to address the systemic culture of impunity (HRCP, 2021). The Federal Ombudsman and the National Commission for Human Rights (NCHR) have also received numerous complaints related to police misconduct, though their mandates are largely advisory.

Moreover, public trust in the police remains abysmally low. According to a Gallup Pakistan (2020) survey, only 25% of respondents expressed confidence in the police, placing them among the least trusted public institutions. There is a subsequent undercutting of confidence, which is not only a cause but also an impact of the ineffectiveness of accountability structures. The people end up not complaining because of the fear of harassment or believing that the system is not fair. Without the oversight that has a chance of being believed, the victims of police abuse are left with little to depend upon.

Some recent efforts indicate incremental progress. In Khyber Pakhtunkhwa (KP), the police reforms initiated after 2013 under the then government retained elements of the Police Order and emphasised depoliticization and merit-based recruitment. However, even in KP, public safety commissions have not emerged as effective oversight bodies, and civil society engagement remains minimal (Rehman, 2018).

Pakistan has never been able to achieve its police accountability and public safety commission because of the circumstances under which it happened, due to the

weakness of institutional involvement. It is neither the lack of formal mechanisms, nor the absence of political commitment, institutional autonomy or actual people empowerment, which makes the mechanisms defective. Any reform agenda that emerges in the future must address these underlying deficits and must become more rights-based as well as citizen-focused vis-à-vis the police.

B. India

The history of the current policing system in India is marked by the historical conflict between the practice of colonial policing and the democratic vision articulated in the postcolonial model of government in India. Similarly, to Pakistan, India became an inheritor of the Police Act of 1861, the colonial piece of legislation which valued notions of control over notions of service. This model in particular has contributed to the modern-day police practices that see them being politicised, non-transparent, and have numerous seemingly human rights abuses. But what has characterised India in its course toward police reform are the strident judicial interventions, high on the list is the landmark case of Prakash Singh v. Union of India (2006) judgment, which remains the cornerstone of modern police accountability discourse in the country.

The *Prakash Singh case*, a case decided in the Supreme Court of India, produced a stream of directives that were binding to reform the police structure in a bid to facilitate meaningful autonomy, transparency and accountability. Among the most important directives was the establishment of Police Complaints Authorities (PCAs) at the state and district levels to investigate complaints of serious misconduct, including custodial death, rape, and abuse of power. The Court also called for fixed tenures for senior officers, separation of investigation and law-and-order functions, and the creation of State Security Commissions (SSCs) to insulate police leadership from political influence (Commonwealth Human Rights Initiative, 2019).

Although the specified reforms are progressive, their execution has been uneven and haphazard, varying by state in India. A 2020 status report presented by the NITI Aayog and a subsequent report published by the CHRI reveal that most of the states have failed to constitute PCAs or have created them with watered-down powers. As an example, PCA recommendations are not binding in a number of states, and the commissions do not have the power to call out police to discipline police officers. In many cases, appointments to these bodies are either delayed or influenced by the political executive, undermining their independence (CHRI, 2019; Verma, 2012).

Further, the State Security Commissions that were created to offer oversight of the police operations and policy-making were, in most cases, turned into a symbolic existence. Others have disregarded the stipulation that the commissions should have independent members of the civil society, making the commissions serve as an arm of the executive. Consequently, the police remain politically compromised, in cases of high-profile or election time. The persistence of "transfer raj"—frequent politically motivated transfers of senior officers—reflects the limited

success in insulating the force from political interference (Second Administrative Reforms Commission, 2007).

India also has extreme problems of police brutality and other challenges, and the people do not trust the police. Custodial violence remains pervasive, with the National Human Rights Commission (NHRC) recording hundreds of custodial deaths each year. According to the India Justice Report (2020), no Indian state met even 50% of the requirements outlined by the Supreme Court in Prakash Singh. The delays that occur in investigations and corruption, as well as the lack of transparency of the internal disciplinary processes, contribute to reducing police credibility. A 2019 study by the Centre for the Study of Developing Societies (CSDS) found that a majority of Indian citizens believe the police discriminate against marginalised communities, particularly Dalits, Muslims, and Adivasis (CSDS, 2019).

At the sub-national level, some special efforts at reformation have been made. This has not been the case in Kerala, where the State Police Complaints Authority has been more active and independent, possibly because of political support and involvement by civil society. On the same lines, Mizoram and Himachal Pradesh have worked out the functioning PCAs with transparent processes and reporting that are done periodically. Such scattered cases are signs that change can happen when there is institutional will and a demand by the citizens.

Press and non-government organisations have been the most vocal supporters of law enforcement reforms in India. The Commonwealth Human Rights Initiative, Human Rights Law Network and other NGOs have continuously tracked the extent of State adherence to Supreme Court directives, maintained publicity campaigns, followed up cases of police brutality and assisted the victims. Such initiatives, however, tend to be hampered by the inaccessibility of information, red tape resistance and lack of legal enforcement.

India has helped demonstrate the boundaries of judicial reform where the will and independence of institutions are not to be found. Although the Supreme Court action in Prakash Singh has ostensibly created a precedent in the legal domain, the game-changing potential has been thwarted by the state's reasons in their refusal to cede power to the police. Even the presence of Police Complaints Authorities has not been able to result in effective monitoring, and in most cases, the gap between the legislation and the operation is still large. Nevertheless, it offers some useful insights into what judicial activism can achieve, the value of civil society oversight, and how much of a challenge accountability mechanisms can be in a complex federal political environment.

C. United Kingdom

The United Kingdom is one of the countries which is often mentioned to have done well in terms of institutionalising police accountability. Unlike Pakistan and India, the UK has created an inter-tiered system of oversight concerning the police, which is founded on legal privilege, accessibility to the community and the public. This framework has changed considerably over the last several decades, especially after dramatic examples of police misconduct and the perception of the

need to improve policing surfaced, and the citizens demanded the changes. The two most notable institutional mechanisms of accountability are the Independent Office for Police Conduct (IOPC) and elected Police and Crime Commissioners (PCCs), both of which function with a high degree of operational autonomy and are underpinned by strong legislative mandates.

The IOPC, formerly known as the Independent Police Complaints Commission (IPCC), was established under the Police Reform Act 2002 and reconstituted in 2018 to strengthen its independence and capacity. IOPC investigates the most serious complaints in respect of police misconduct in England and Wales, such as deaths in custody, the use of excessive force and corruption. Its biggest caronal feature is that it has legal backing to investigate even without a formal complaint. It also has the authority to compel evidence from police forces and recommend disciplinary or criminal proceedings (Home Office UK, 2020).

The significant aspect of the IOPC is that it is independent in its way of operating, with neither the police nor the government ministries. Its investigators are civilians and not ex-police officers, which eliminates issues of internal bias, which is prevalent among the oversight mechanisms in most developing nations. The IOPC publishes detailed reports and statistics, enhancing public access to information and reinforcing trust in its processes (IOPC, 2022). Even though there have been instances where the IOPC has been accused of being slow in its investigative processes and lacking enforcement power, it still continues to be a prime foundation of the civilian oversight in the UK.

In parallel, the Police and Crime Commissioners (PCCs) were introduced through the Police Reform and Social Responsibility Act 2011. Such elected officials have the roles of establishing strategic priorities of local police forces, controlling their performance and managing finite budgets. They are directly answerable to the people in front of whom they get elected, thereby strengthening democratic authority. PCCs have the authority to appoint or dismiss Chief Constables and are supported by Police and Crime Panels (PCPs), which scrutinise their decisions. While PCCs do not investigate individual complaints, their role in holding the police leadership accountable for systemic issues is vital (Lister, 2019).

The community involvement, encouragement and transparency are also factored into the UK police accountability system. Numerous police departments pay attention to the civic consultation and publish their work indicators, consulting civil society organisations and involving the latter in the development of the policing policies. Some of the measures intended to bring more oversight to the policing include the use of body-worn cameras, data regarding the use of stop-and-search tactics and the disclosure of misconduct findings to the general populace. Such activities have led to fairly high levels of trust in the police. According to the British Social Attitudes Survey (2021), over 70% of the population expressed confidence in their local police, significantly higher than levels reported in Pakistan or India.

The next important attribute of the UK model is paying more attention to proportionality and responsibility in using force. The officers receive extensive

training on de-escalation measures, and there is a culture of documentation and review after any incident of use of force. The investigation and responsibilities of misconduct are conducted under an open bill of discipline with the College of Ethics Code of policing that makes it uniform throughout all forces.

The UK system has a number of challenges, although it is a strong system. Critiques have levelled the IOPC with failures to sometimes bite and follow through, coupled with extended periods of investigations. Furthermore, the racial profiling and systematic bias phenomena, in particular, regarding stop-and-search procedures, were also serving to attract criticism. Reports from Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) and NGOs such as Liberty have flagged these concerns (HMICFRS, 2020). The UK, however, maintains an ability, in the face of such critiques, able, as it is to respond to them with adjustments to its oversight system.

Overall, the United Kingdom can provide an example of a broader and dynamic model of police accountability, integrating features of independent control, democratic and community control. IOPC and PCCs are auxiliary systems, and they are a compromise between the integrity of operation and civilian control. Although still not a perfect system, the institutional development that has occurred in the UK about holding police to account is rather contrast with the politicised and weak system that exists in Pakistan and India. It puts much weight on the importance of legal autonomy, distribution of resources, transparency and trust among human beings in the conceptualisation of effective accountability platforms.

Lessons and Best Practices for Pakistan

Establishing Independent and Empowered Oversight Bodies

Among the most critical factors taught by the case of the police accountability system of the United Kingdom is the need of having a relevant oversight institution of police that has clear statutory power. Pakistan's Public Safety Commissions (PSCs), introduced under the Police Order 2002, have largely remained inactive or ineffective due to weak legal backing and political interference. To ensure the effectiveness of these bodies, Pakistan needs to enact effective legislation that spells out what a body can do, such as have the powers to look into complaints, call police officers to answer questions and make disciplinary recommendations that carry binding force. It is also important to have operational independence by having the members appointed in an open, transparent process that is merit-based with participation of judiciary representatives, civil society, and human rights groups. They should have sufficient financial and administrative resources to address their investigative abilities. This way of empowering oversight bodies will tackle the issue of impunity and will make them closer to the people, creating increased transparency and consequently increasing the much-needed trust in the institution of policing.

Insulating Police Leadership from Political Interference

The transfer and appointment of police officials through political ambitions and whims is an element which is continuous in both Pakistan and India. The UK's

model of elected Police and Crime Commissioners (PCCs) demonstrates how democratic oversight can coexist with operational independence. Pakistan may come up with Provincial Police Accountability Boards that would be entrusted with the responsibilities of ensuring entry appointments and transfers of the ranks in the police are on a merit basis and given specific tenures. There should be a law that protects against arbitrary transfers, requiring procedural fairness and documented justifications that should be provided. In addition, the representation of the communities through mechanisms that oversee the sector would be adopted, eliminating abuse of power. The reforms would stabilise the leadership of the police, decrease the political interference, and promote professional policing.

Strengthening Complaint Mechanisms and Access to Justice

Effective accountability depends on accessible and trusted complaint mechanisms. In Pakistan, the citizens mostly do not complain because of fear of retribution, the system is most of the time complex and because of low levels of confidence in the system. Inspired by the UK's Independent Office for Police Conduct (IOPC) and proactive Indian states like Kerala, Pakistan should establish user-friendly complaint portals at both police stations and online, ensuring confidentiality and protection for complainants. Timely investigations with clear procedural timelines and reporting publicly on the outcomes should also be the rule, with proper reporting rather than left to their own interpretation. It is also necessary to provide legal aid services and victim support to help the victims access the justice system, particularly those disadvantaged. Involvement of the civil society in the monitoring of complaints can make it even more transparent and responsive. These interventions would enable the citizens to become the watchdogs of the police and show their commitment towards zero tolerance towards abuse.

Promoting Transparency and Public Engagement

The main features of police accountability are transparency and engagement of communities. Whereas in Pakistan the policing tends to be largely opaque, police forces in the UK have to publish data on complaints, use of force and disciplinary proceedings and consult with the communities and have advisory boards in place. Pakistan is also supposed to follow the same practices by making their policing practice inclined to citizens, requiring regular meetings on policing priorities and the safety needs of the local area, by requiring published data on policing itself. Oversight would be enhanced by the introduction of body-worn cameras and other technology-based transparency tools, and clear policies concerning their use. Positive police-community relations would be enabled by training the police officers on the aspects of community policing and treating them with respect and being culturally sensitive. These measures, when taken together, will facilitate closing the deficit in trust and enhancing cooperation.

Institutionalising Training and Ethical Standards

This will not only professionalise the police force, but it will also bring in systemic changes in training and a shift in ethics. The initiatives of the Code of the College of Policing in the UK and the Indian reform show the importance of codified

codes of ethics and ongoing personal professional development. Pakistan is supposed to come up with a national police-training program whereby human rights, accountability and community engagement are included. It is important to develop a Code of Ethics based on the international principles and require obedience to be followed with disciplinary action against those who do not obey. Adaptation of a culture lessening self-accountability by hosting examinations not unruffled by expertise of peers, inner reviews, and leadership that is scrupulous will assist in implanting these values. It is also crucial to conduct specialised training on investigation techniques, gender sensitivity, and minority rights to overcome the increased form of biases in the system and enhance better policing.

Encouraging Civil Society and Media Partnerships

The independent media and civil society organisations are a critical element in police scrutiny and proffering reforms. Although their involvement in Pakistan is usually confined by political influences, cooperation between the oversight bodies and the civil society organisation can enhance data exchange and common monitoring activity. The freedom of the press and the protection of whistleblowers are essential in having independent reporting on misconduct by the police. The societal education campaigns need to be encouraged to inform the citizens of their rights and the existing methods of redressing. A vibrant civil society milieu can add transparency and continue to apply pressure on agencies of accountability, which supplements formal institutions of accountability.

CONCLUSION

The ability of police to be accountable in the democratic governance and ensure the security of the citizens will continue to be a pillar of the democratic process. This comparative research into Pakistan, India and the United Kingdom has pointed to the stark disparities that exist in the way that these nations organise and execute strategies that seek to keep the police workforce answerable regarding their acts. Many countries have fallen short of this, and indeed, there are shortcomings in Pakistan and India due to politicisation, poor effectiveness and low levels of trust by the citizens, whereas the UK has something of a mature, institutionalised, independent police oversight.

The history of these nations shows that law by itself is not the legal system required to guarantee efficient accountability. The police order of 2002 in Pakistan and directives given by the Supreme Court of India regarding police reforms are a good-intentioned act, but tackling the real health of police has proven to be hit and miss because of political will, interference and availability of funds. In contrast, the UK's statutory institutions like the Independent Office for Police Conduct (IOPC) and Police and Crime Commissioners (PCCs) illustrate how empowered and autonomous bodies, coupled with civic participation, transparency, and clear mandates, can enhance police accountability and rebuild public confidence.

This study underscores several critical lessons for Pakistan. Topmost on this list is the immediate setting up of genuinely independent and robust oversight

institutions with the powers of investigation and the ability to avoid any political and police interventions. In the absence of such bodies, police misconduct is not checked, and this has created a culture of impunity. In addition, ensuring the leadership of the police is not subject to politically induced transfers and encouraging merit-based police appointments are well needed in professionalising the force and guaranteeing uniform application of accountability levels.

The other essential element of a fully functional system of accountability is the availability of visible and easy-to-navigate systems of complaints. The citizens need to feel free to report the abuses and to be confident that their complaints are investigated without any bias. The systems in place in Pakistan today do not tend to do so and instead have put citizens off and also promoted mistrust. One of the possible ways to reduce this gap is the implementation of technological strategies, the security of complainants, and the engagement of civil society in surveillance.

A great emphasis should also be put on fostering transparency and community interactions. Police agencies should engage regularly in providing distributions of information on their practices and results regarding complaints and police misconduct investigations. Communities benefit when their trust is built by officers and is reflected in the area of policing priority in coordination with societal safety interests. Educating police on community-oriented policing, ethics and human rights also supplements the implementation of structural reforms since they create a culture of self-accountability.

Finally, yet importantly, the civil society and independent media could not be overemphasised. A healthy civil society that works in cooperation with the official structures and the police in terms of keeping them answerable in terms of advocacy work and public awareness enhances the overall accountability ecosystem. Freedom of the press and access to whistleblowers provide protection and exposure of abuse and maintain scrutiny by the populace.

Enhancing police accountability in Pakistan is not an easy process, but one that can be attained. It has to be politically committed to reform, legislatively clear, its institutions must be strengthened, and it would have to have the support of broad society. The experiences in the UK and reforms in India have given us invaluable models; it is, however, important that Pakistan adjust to incorporate these best practices into the local social-political landscape.

Overall, it seems that the primary goal of advancing police accountability is not to decrease misconduct but to embrace the rule of law, guard human rights, and cultivate the deserved trust between the government and the people. Pakistan can then develop a more professional, accountable police agency that is community-based and leads to sustainable freedom of the people through appreciating these reforms.

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