

Custodial Deaths in India: An Analysis of Legal Safeguards and Police Accountability with Reference to the Sattankulam Case

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Abstract: Custodial deaths are a serious violation of human rights and the right to life guaranteed under Article 21 of the Constitution of India. Despite existing constitutional, statutory, and judicial safeguards, custodial violence continues to raise concerns about police accountability. This paper examines the Sattankulam custodial death case of 2020, involving the deaths of P. Jayaraj and J. Bennicks in police custody. The study analyses the legal safeguards, institutional and procedural failures, investigation, and factors that contributed to the conviction of nine police personnel in 2026. The case highlights the gap between legal provisions and their effective implementation, particularly in relation to police accountability, independent oversight, evidence preservation, and timely justice. The paper recommends stronger CCTV and recording mechanisms, independent custodial oversight, proper medical examination, time-bound trials, and improved police accountability to prevent custodial violence and deaths.

Keywords: Custodial Death, Police Accountability, Sattankulam Case, Article 21, Human Rights, Custodial Violence.

INTRODUCTION

In India Police is the state subject. Custody of an individual by the State inherently involves a constitutional guarantee that the person detained remains under the protection of the law. Death in police or judicial custody represents a failure of the rule of law and also constitutes a personal tragedy. The concept of custodial death broadly refers to the death of a person in police or judicial custody and constitutes a violation of Article 21 of the Constitution of India. The Constitution of India guarantees that no person may be deprived of life or liberty except according to procedure established by law. Therefore, custodial violence, death, and abuse of any sort by law enforcement agencies or the judiciary are direct violations of this fundamental constitutional guarantee. India's record on custodial deaths has always been a matter of concern to human rights organizations, forums, as well as academicians. According to the data presented before the Lok Sabha, India records substantial number of custodial deaths even in the first few months of 2026, indicating that such deaths are far from being an isolated incident and demand a systematic approach to investigate, determine the root causes, as well as evolve suitable remedial measures. Despite the elaborate constitutional and statutory framework on custodial

deaths, the phenomenon still plagues the country and authorities have repeatedly attempted to conceal such occurrences and shield the concerned officials from the wrath of the public.

This research paper analyzes the controversial and highly publicized Sattankulam custodial death case as an illustration of broader issues related to death in police custody in the country. The issue of custodial deaths in India continues to be a matter of concern for the government, judiciary, civil society, as well as the media. On 19th June, 2020, A 59-year-old P. Jayaraj, a local shopkeeper and his 31-year-old son J. Bennicks were arrested by the police from Sattankulam town in Thoothukudi district of Tamil Nadu for allegedly remaining open beyond the hours stipulated under the COVID-19 lockdown without police permission. However, the arrest was found to be false by the Central Bureau of Investigation (CBI). The duo was allegedly subjected to sexual assault and harassment by the police during their custody, following which Bennicks died on 22nd June 2020 while Jayaraj died the next day. The case received unprecedented national and international media attention and was compared to other cases of custodial death as well as police brutality across the world. The case was transferred to the CBI with allegations of tampering with evidence, including absence of the CCTV footage from the police station. After prolonged trials and years of delays, a Madurai sessions court in March 2026 convicted nine police personnel in connection with the deaths in police custody. All nine were awarded death penalty by a sessions court in Madurai, Tamil Nadu in April 2026 for custodial death and custodial torture of the father and son. The court reserved the award of death penalty after the longest deliberation in its history to the families of the victims saying that this falls under the 'rarest of rare' category of crimes under the Indian Penal Code (IPC).

The Sattankulam custodial death case is a pertinent reminder of the prevalence of police brutality and torture in India as well as the lack of effective redress mechanisms and judicial oversight in dealing with such situations. The case demonstrates that in order to bring about accountability, it may sometimes take years for justice to be delivered. The case is also notable for demonstrating the kind of systemic failures that could lead to the death of a person in police custody. In addition, the case outcome highlights the fact that despite the elaborate legal framework, there are loopholes that prevent India from realizing the dream of effective custodial safeguards and accountability.

STATEMENT OF THE PROBLEM

In spite of the presence of a comprehensive legal framework, deaths in police custody continue to occur in India at an alarming rate, with conviction of the perpetrators being the exception rather than the rule.

RESEARCH OBJECTIVES

This research paper study the Constitutional, statutory and judicial framework on custodial death in India, discuss the Sattankulam custodial death case, Identify the various factors which contribute to custodial deaths and the lack of accountability and also try to highlight the required reforms and changes which need to be made to enhance custodial safeguards and accountability.

RESEARCH QUESTIONS

- What legal and constitutional safeguards exist against custodial deaths, and why are they not effective?
- What institutional and procedural factors led to the Sattankulam custodial deaths?
- What factors led to the conviction of police personnel in the Sattankulam case?

SIGNIFICANCE OF THE STUDY

This paper will contribute towards the existing literature on police accountability by examining the issues of police torture and death in police custody through the lens of a high profile, highly publicized case which involved unprecedented public and media reaction as well as a complicated set of legal procedures and outcomes. This case is of particular significance due to the fact that conviction of police personnel was a rare occurrence and provides a foundation for future research as well as informing policy and practice.

LITERATURE REVIEW

The custodial violence in India, both theoretical and applied, may be said to represent three broad areas of discourse: constitutional and human rights-based law, criminological police and society, and the empirical data on the cases provided by the National Human Rights Commission (NHRC) and the National Crime Record Bureau (NCRB). The literature concerning the former area has been produced by numerous authors who examine the phenomenon of custodial torture as an offence against Article 21 of the Constitution. The trend in this particular stream of research has been to go over the developments of the past few decades in the judiciary practice concerning custodial violence through the prism of relevant supreme court verdicts.

Notably, the debates in this area often refer to the guidelines of the *D.K. Basu v. State of West Bengal* (1997) judgment, which the supreme court (SC) hopes to see implemented in all states as the minimum standard of custody conditions through its list of eleven items. The compensation practice in cases of death in custody, which is the state responsibility as affirmed in *Nilabati Behera v. State of Orissa* (1993), also falls under this rubric, despite the torts in such cases being regarded as private wrongs.

The second area pertains to police reform and the structural problems in Indian policing, where issues of custodial violence are viewed as a part of a larger context of police accountability. The articles published in this area in the aftermath of the *Prakash Singh v. Union of India* (2006) judgment, which mandated that all the states to enact model police reforms, which invoke the concept of dereliction of state duties as the root cause of the problem. Police corruption, internal autonomy, and external control are also discussed as crucial factors in the occurrence of custodial violence and people's lack of recourse.

Finally, the literature that utilizes the information provided by the NHRC and the NCRB speaks of the prevalence of violence in Indian jails in numbers much higher than those officially reported. This stream of research, represented by various articles and white papers, highlights the discrepancies in death statistics resulting from the different approaches to custodial death registration, as well as the overall lack of punishment for police officers responsible for such deaths despite the NCRB data indicating otherwise.

The literature referring specifically to the Sattankulam case revolves around the reports published by media outlets and newspapers which investigate the circumstances of this particular case. Articles such as those published by Frontline, NDTV and others analyze the reasons for the prolonged detention of the protest leaders, namely its use as a pretext to detain ten activists under the pretence of a minor regulation violation. The inadequate law enforcement practices examined include the lack of CCTV evidence due to its deletion by an auto-delete function and allegations of bribe from the judicial magistrate who initiated the investigation. The articles also comment on the subsequent reopening of the case by the Madras High Court and the involvement of CBI, which was brought in by the public clamour.

It should be noted that despite the case receiving considerable media attention, there is currently little literature attempting to conceptualize the issue of custodial violence using the Sattankulam case as a basis for analysis. This is largely due to the fact that the case has only recently been concluded, with most of its prominent trials having been finalized at the end of 2026. The convoluted proceedings have so far seen one conviction in March 2026 and the sentencing in April 2026. Thus, this paper's application of the Sattankulam case to the theoretical framework of custodial violence goes into greater detail on the development of the case to see if any factors not previously stated may influence further verdicts.

LEGAL FRAMEWORK GOVERNING CUSTODIAL DEATHS IN INDIA

Constitutional Provisions: According to (Article 21) that no person shall be deprived of his life or liberty except in accordance with law. The Supreme Court has taken a very expansive view of what constitutes life: it includes the right to live with dignity. (Article 22) In a custody, the person being held must be informed on grounds of arrest, have the right to consult a lawyer, and must appear before a magistrate within 24 hours of arrest.

Statutory Safeguards: The Code of Criminal Procedure, 1973 (CrPC) contains several provisions dealing directly with custodial safety: Section 41: Conditions under which a police officer can make an arrest without a warrant. Section 41A (inserted by amendment): Notice of appearance in lieu of arrest for cognizable offences punishable with imprisonment of up to seven years. This was meant to prevent the kind of wanton arrest made in the Sattankulam case. Section 46: The manner of arrest; police cannot use more force than is necessary for the arrest. Section 50: Arrested person must be informed of grounds of arrest. Section 54: An arrested person has a right to medical examination, which becomes critical if there is a dispute about injuries. Section 176(1A): A judicial magistrate must investigate every death in police custody, apart from the police inquiry. This was how the Kovilpatti judicial magistrate first looked into the deaths of Jayaraj and Bennicks. The Indian Evidence Act, 1872, Sections 25-27 restrict the admissibility of confessions made to police or while in police custody. The Indian Penal Code has general laws against custodial torture: hurt, grievous hurt, wrongful confinement and culpable homicide or murder (IPC Sections 302, 304, 330, 331). These were the charges that eventually stuck against the Sattankulam police.

Judicial Guidelines: The judiciary has also been a key player in developing legal safeguards for people in custody. In *D.K. Basu v. State of West Bengal*, the Supreme Court directed that arresting officers should wear

name tags identifying themselves; that a memo of arrest be prepared and signed by a witness present at the time of arrest, and that the arrested person's relative or friend be informed of the arrest and where it is taking place. In *Nilabati Behera v. State of Orissa*, the Supreme Court ruled that the state's liability to pay compensation to the next of kin of a person who dies due to the state's custodial torture is a matter of public law, which means that it cannot be evaded by saying a criminal trial is pending. The issue of compensation is therefore distinct from whether criminal charges will be filed against police. In *Paramvir Singh Saini v. Baljit Singh* (2020), the Supreme Court of India instructed that all the states and union territories to install CCTV cameras in all the police stations, with recordings having to be retained for a specified period. Sattankulam police were accused of destroying evidence because the CCTV footage was deleted automatically after a certain period.

International Standards: India signed the United Nations Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (UNCAT) in 1997, but has not ratified the convention, so is not obligated to implement it. Indian law scholars and human rights groups have therefore often pointed to this gap, arguing that India needs its own anti-torture law.

THE GAP BETWEEN LAW AND PRACTICE

There is a lot of theory about legal safeguards for people in police custody, but they often do not get implemented. As the following case study shows, the very existence of these safeguards serves to make sure that police get away with custodial murders and tortures. Magisterial inquiry, CCTV cameras and medical examination of the dead body: all can be thwarted by someone in authority who cares to cover up for the police.

Case Study: The Sattankulam Custodial Death Case: On 19 June 2020, 59-year-old P. Jayaraj and his 31-year-old son J. Bennicks ran a mobile phone accessory shop in Sattankulam, a town in Thoothukudi district, Tamil Nadu. Due to COVID-19 lockdown restrictions, local authorities had imposed strict guidelines for shop operating hours. According to the police version of events, as described at the time of incident, the two men were detained for allegedly keeping their shop open past the permitted closing time and making a derogatory remark to police personnel. However, according to the CBI's chargesheet, the lockdown infringement itself never occurred thus, the grounds for their detention were fabricated.

Timeline of Events: Jayaraj and Bennicks were brought to the Sattankulam police station on the evening of 19th June, 2020. According to witness testimony given during investigation (and recorded by the one and only policewoman who was present), the two men were beaten throughout the night. Both men's conditions deteriorated over the next few days Bennicks died at Kovilpatti Government Hospital on 22 June 2020, while Jayaraj died at the same hospital in early hours of 23rd June, 2020. A judicial inquest was conducted, with post-mortem examination by three doctors and video recording by the judicial magistrate due to the sensitivity of the case.

Allegations of Torture and Procedural Failures: The Kovilpatti judicial magistrate M.S. Barathidasan was assigned the mandatory Section 176(1A) inquiry into the deaths. His four-page report to the Madras High Court's Madurai bench detailed serious irregularities: testimony from the sole eyewitness confirming that the two men were beaten overnight, and discovery that CCTV footage inside the police station was unavailable (due to it being set to auto-delete). The report also noted non-cooperation and alleged insubordination from police staff during his inquiry, and he himself was harassed while investigating.

In particular, it revealed a layer of compounding systemic failures: the CCTV mandate later reinforced nationally by Paramvir Singh Saini, had essentially already been defeated at the local level through a technical loophole; the existence of independent institutional checks (the judicial magistrate) was met with outright resistance rather than cooperation; and medical examination protocol, though a safeguard per CrPC Section 54, apparently did not prevent or highlight the severity of injuries being inflicted.

INVESTIGATION AND INSTITUTIONAL RESPONSE

The initial investigation was conducted by local police, but due to mounting public pressure and clear conflicts of interest (as the accused were also police personnel), the case was transferred to the Crime Investigation Department (CB-CID). Several personnel including the inspector, a sub-inspector and constables of the Sattankulam station were arrested for the murders under Section 302 IPC. The Madras High Court's Madurai bench, which exercised suo motu oversight, ordered protection for the key eyewitness and closely monitored the progress of the investigation. Due to concerns over fairness and independence of state-level investigation, the case was transferred to the Central Bureau of Investigation (CBI). This is notable as the investigation into the conduct of some of the same police personnel extended to more than one case a separate complaint alleged that two of the accused officers had also been involved in the custodial torture and death of another man, Mahendran, back in May 2020.

Trial and Verdict

The trial began on 18 February 2021, following directions from High Court for an expedited process. Despite this, proceedings dragged on for nearly five years, hampered by staff shortages and repeated adjournments; by 2025 hundreds of witnesses had been examined across multiple hearings. One of the accused attempted to turn approver (state witness) in exchange for leniency, but this was refused by the court. On 23 March 2026, the sessions court in Madurai found all nine accused police personnel guilty of the murders. On 6 April 2026, the First Additional District and Sessions Court presided by Judge G. Muthukumaran sentenced all nine to death, and also imposed fines of over Rs. 1 crore on the convicts. It described the case as "rarest of rare", a doctrine established by the Supreme Court in 1980, which permits the death penalty only in cases of extreme brutality or aggravating circumstance in this case, the court found that the brutality of the assault and abuse of police powers met this description. The death sentences remain subject to appeals in higher courts.

Public and Political Response: The case generated considerable national and international attention in 2020, with widespread protests, trending social media campaigns and expressions of concern from celebrities and civil society organizations. It also had a political dimension a plea was filed before the Supreme Court seeking to restrain the then Tamil Nadu Chief Minister to hold the home portfolio during the pendency of investigation and trial, alleging that a public statement made by the Chief Minister at an early stage served to shield the accused officers.

Analysis The Gap Between Law and Implementation: The Sattankulam case serves as an illustrative example of how a comprehensive legal framework can fail in practice. Each safeguard listed out in Section 3 genuine grounds for arrest, CCTV surveillance, medical examination and independent magisterial inquiry were all circumvented the grounds for arrest were found to be fabricated, CCTV footage was made unavailable via technical setting and the magistrate's mandatory inquiry was met with obstruction. This points to legal safeguards that exist but lack genuine independent enforcement mechanisms being vulnerable to being circumvented by the people they are designed to constrain.

Systemic Issues: Impunity and the "Blue Wall of Silence" The reports of non-cooperation of police staff with the inquiry by the judicial magistrate and the initial reliance on a police eyewitness who was also willing to testify against colleagues, are reflective of a pattern documented in literature, namely the presence of an informal code of solidarity among police staff that discourages testifying against each other. It is notable that the only reason why there was any accountability in this case was due to external pressures national media attention, High Court intervention and the CBI's eventual transfer of the case rather than by the normal mechanisms of local police accountability. This highlights a systemic issue where cases that do not garner this kind of attention may be significantly less likely to result in prosecution or conviction.

The Cost of Delay While the case ultimately concluded with conviction and sentencing, the almost six-year gap between the deaths in June 2020 and the verdict in April 2026 is reflective of a recurring problem in custodial death litigation even in high profile, highly monitored cases with High Court and CBI involvement, the normal pace of trial proceedings (hindered by staff shortages and adjournments) can significantly delay justice. For families of victims in less prominent cases who lack such public attention, this may stretch on for much longer or cease entirely.

Socioeconomic and Contextual Dimensions The victims in this case were small shopkeepers who were detained for a minor infraction keeping their shop open past the permitted closing time during a pandemic under lockdown restrictions. This highlights a common feature seen in custodial violence literature the disproportionate vulnerability of economically disadvantaged individuals who may not have access to immediate resources or influential connections.

Pattern, Not Aberration The parallel allegation involving the same police station and some of the same officers in the death of Mahendran just weeks prior is reflective of an underlying issue with an entrenched local culture of impunity and lack of accountability. National statistics (custodial death figures placed before Lok Sabha in 2026) suggest that Sattankulam, while a prominent case, is reflective of a pattern across Indian states.

The Role of Media, Judiciary and Civil Society The case also serves as an illustration of the outsized role that media coverage, High Court supervision and public mobilization play in India in terms of securing custodial accountability, given the lack of consistently effective routine oversight mechanisms. The Madras High Court's active supervision, including witness protection orders, and eventual transfer of the case to CBI were all responsive to public pressure as much as institutional design.

RECOMMENDATIONS

Based on the legal framework considered and the events surrounding the Sattankulam case, the following reforms are suggested to prevent such occurrences in the future:

Mandatory tamper-proof CCTV surveillance: The Supreme Court's instructions for CCTV installation vide *Paramvir Singh Saini v. Baljit Singh* must be implemented through technical safeguards against circumvention. The Sattankulam case demonstrated that a simple setting for automatic deletion would render the CCTV ineffective. Footage should be stored externally in servers not accessible to personnel at the given police station, with mandatory retention periods and automatic backup to an authority at the state or district level that does not have local jurisdiction, to prevent tampering by police.

Independent custodial oversight bodies: every States must establish (in accordance with *Prakash Singh v. Union of India*) independent police complaint authorities staffed by retired judges, civil society and domain expert representatives, and with the ability to accept complaints of custodial abuse directly, without going through the internal police hierarchy which promotes the "blue wall of silence" demonstrated by the Sattankulam authorities.

Mandatory body-wearable recording and independent medical examination: Body-wearable recording devices must be issued to arresting and interrogating officers and their use mandated. In addition, medical examination of the arrested person under CrPC Section 54 must be carried out by a doctor not employed by a local police-affiliated hospital and the results communicated directly to the relevant judicial magistrate, without going through police channels.

Time-bound, fast-track trials: Given that the Sattankulam trial was dragging on for nearly five years despite directions from the High Courts to complete it expeditiously, the courts must designate exclusive fast-track courts with time-bound limits and sufficient judicial and prosecutorial staffing for trial of custodial death cases. Delays due to administrative vacancies should be averted by ensuring these courts have the required resources at all times.

Ratification of UN Convention Against Torture and passage of anti-torture law: India must ratify the UN Convention Against Torture and adopt a standalone anti-torture law criminalizing custodial torture, which will bring Indian law into conformity with international human rights law and provide clearer legal grounds for action against perpetrators.

Police training and institutional cultural reform: Police must receive training in human rights, de-escalation and lawful arrest procedure, and a culture of command responsibility for custodial incidents occurring in their jurisdictional area or station must be cultivated. This addresses the deeper institutional rot rather than merely the manifestations.

Whistleblower protections for police: The Sattankulam case demonstrated that the police force is heavily reliant on the testimony of their own personnel, whether out of self-preservation or systemic corruption. Formal whistleblower protections must be provided to police who report custodial misconduct by their colleagues.

CONCLUSION

The Sattankulam custodial death case stands as a grim testament to both the failings of India's system of checks and balances and yet, in the end, demonstrates that accountability for such violations of the Constitution and laws of India do find their due expression in the system, albeit with great difficulty and delay. The deaths of P. Jayaraj and J. Bennicks in June 2020 revealed how easily the requirements of Section 49 of the CrPC (reasonable grounds for arrest), the mandatory CCTV provisions and independent medical examination could be circumvented by authorities willing to ignore them, but that the combined efforts of media scrutiny, High Court involvement and CBI intervention could deliver justice, albeit nearly six years after the fact. The fact that nine personnel were finally sentenced to death in 2026 provides a measure of closure for the Jayaraj family and shows that India's police system is not impervious to scrutiny. However, the length of this process and the fact that it was only possible due to high-profile media coverage raises the question of how many such cases are there in India which never see the light of day, where families are not able to achieve the same level of success in pressing charges. This concern must inform the reforms recommended in this paper: if India is serious about upholding the constitutional rights of citizens under Article 21 as enshrined in the Constitution of India, these reforms to the criminal procedure and police practices must be made not just on paper, but implemented consistently so that police custody death cases are handled according to time-bound and evidence-based procedures regardless of media coverage and political interference. The rule of law in India is only as strong as its weakest link, and the Sattankulam case demonstrates that this weakest link tends to be the police custody system.

REFERENCE AND BIBLIOGRAPHY

- Asianet Newsable. (2026, April 7). *Sathankulam father-son custodial death case explained: Why 9 Tamil Nadu cops got death penalty*. <https://newsable.asianetnews.com/india/sattankulam-jayaraj-benniks-custodial-deaths-in-thoothukudi-what-led-to-death-penalty-for-9-tamil-nadu-cops-articleshow-iondfg5>
- Brut India. (2026, April 22). *Sathankulam custodial deaths: What led to the death penalty verdict*. <https://www.brut.media/in/articles/india/society/sathankulam-custodial-deaths-what-led-to-the-death-penalty-verdict>
- Deccan Herald. (2020, July). *Custodial deaths plea in SC to restrain Tamil Nadu CM from holding home portfolio*. <https://www.deccanherald.com/national/south/custodial-deaths-plea-in-sc-to-restrain-tamil-nadu-cm-from-holding-home-portfolio-856664.html>
- Hindustan Times. (2020, July 1). *Victims beaten all night: Eyewitness*. PressReader. <https://www.pressreader.com/india/hindustan-times-patiala/20200701/282097753980412>
- Hindustan Times. (2020, July 3). *TN custodial deaths: Three police personnel arrested*. PressReader. <https://www.pressreader.com/india/hindustan-times-st-noida/20200703/281505048497829>
- Hindustan Times. (2020, July 9). *Two cops named in case being probed for one more custodial killing*. PressReader. <https://www.pressreader.com/india/hindustan-times-patiala/20200709/282007559682755>
- Wikipedia contributors. (n.d.). *Death of P. Jayaraj and J. Bennix*. Wikipedia. https://en.wikipedia.org/wiki/Death_of_P._Jayaraj_and_J._Bennix

CASES

- D.K. Basu v. State of West Bengal, AIR 1997 SC 610.
- Nilabati Behera v. State of Orissa, AIR 1993 SC 1960.
- Paramvir Singh Saini v. Baljit Singh, (2020) 12 SCC 200.
- Prakash Singh v. Union of India, (2006) 8 SCC 1.

STATUTES AND LEGAL INSTRUMENTS

- Code of Criminal Procedure, 1973, No. 2, Acts of Parliament, 1974 (India).
- Indian Evidence Act, 1872, No. 1, Acts of Parliament, 1872 (India).
- Indian Penal Code, 1860, No. 45, Acts of Parliament, 1860 (India).
- The Constitution of India, 1950.
- United Nations. (1984). *Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment*. United Nations Treaty Series, vol. 1465, p. 85.

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