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A Comparative Analysis of BNSS, 2023 with Common Law Jurisdictions: A Reformative Approach

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Abstract: *The enactment of the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS) marks a significant reform in India's criminal procedural framework by replacing the Code of Criminal Procedure, 1973 (CrPC). Envisioned as a modern and citizen-centric legislation, the BNSS seeks to improve the efficiency of criminal investigations, streamline judicial processes, promote the use of technology, strengthen victim rights, and ensure the timely administration of justice. However, the practical effectiveness of these reforms depends upon their compatibility with constitutional safeguards, institutional capacity, and international best practices. This research undertakes a comparative analysis of the BNSS with the criminal procedural laws of five common law jurisdictions the United Kingdom, Singapore, Australia, Canada, and Malaysia which share historical and legal foundations with the Indian legal system. The study critically examines the provisions governing jurisdiction, arrest, investigation, bail, trial procedures, electronic evidence, forensic science, victim participation, and judicial oversight. By identifying similarities and differences among these jurisdictions, the research evaluates whether the reforms introduced under the BNSS successfully balance procedural efficiency with the protection of fundamental rights and due process.*

Adopting a doctrinal and comparative research methodology, the study analyses statutory provisions, judicial precedents, policy documents, and scholarly literature to assess the strengths and limitations of the BNSS. It further explores innovative practices implemented in the selected jurisdictions that could be adapted within the Indian criminal justice system to enhance transparency, accountability, technological integration, and access to justice.

The paper concludes by evaluating whether the BNSS represents a progressive transformation of India's criminal procedural law or whether certain provisions require legislative refinement and institutional support. Based on comparative findings, it proposes policy recommendations aimed at strengthening the implementation of the BNSS while preserving constitutional values, ensuring procedural fairness, and promoting an efficient, rights-based, and globally aligned criminal justice system.

Keywords: *Bharatiya Nagarik Suraksha Sanhita, 2023; BNSS; Criminal Procedure; Comparative Law; Common Law Jurisdictions; Criminal Justice Reform; Jurisdiction; Due Process; Legal Modernization; Policy Recommendations.*

I. INTRODUCTION

Criminal procedure constitutes the institutional framework through which the State investigates offences, prosecutes alleged offenders, protects victims, and determines criminal responsibility. Its legitimacy depends not only on the effective detection and punishment of crime but also on its ability to safeguard individual liberty, ensure equality before the law, and uphold the principles of natural justice and fair trial. In India, criminal procedure was governed for several decades by the Code of Criminal Procedure, 1973 (CrPC). Although the CrPC played a significant role in consolidating procedural law, persistent concerns relating to delay, overcrowded prisons, prolonged pre-trial detention, inadequate investigation, limited use of forensic science, and insufficient victim participation revealed the need for comprehensive reform.

The enactment of the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS)¹ represents a significant attempt to restructure India's criminal procedural system. The BNSS seeks to modernise criminal justice administration by promoting the use of electronic communication, audio-video technology, digital records, forensic investigation, electronic filing, and time-bound procedures. It also seeks to strengthen the position of victims, facilitate access to legal representation, improve investigation procedures, and reduce delays in the disposal of criminal cases². These reforms reflect the broader objective of creating a criminal justice system that is more accessible, efficient, transparent, and responsive to the needs of contemporary society.³

However, legislative reform alone cannot guarantee effective criminal justice. The implementation of the BNSS must be assessed in the light of constitutional protections, particularly the rights to life and personal liberty, equality, legal representation, protection against arbitrary arrest and detention, and a fair and speedy trial. The increased reliance on technology also raises important questions concerning data protection, digital security, authenticity of electronic evidence, unequal access to technology, and the possibility of misuse by investigative agencies. Similarly, provisions intended to accelerate proceedings must be balanced against the accused's right to adequate preparation and meaningful participation in the trial.

A comparative study of common law jurisdictions is useful in this context. The United Kingdom, Singapore, Australia, Canada, and Malaysia share historical and institutional connections with India, while each has developed distinct approaches to criminal investigation, arrest, bail, disclosure, case management, plea processes, electronic evidence, victim participation, and judicial oversight. The United Kingdom provides valuable experience in structured case management and pre-trial judicial supervision. Singapore demonstrates the potential of integrated digital court systems and efficient criminal case administration. Australia offers important approaches concerning victim participation and procedural safeguards. Canada provides a strong constitutional framework for fair trial rights, disclosure, and judicial independence. Malaysia, which shares several institutional similarities with India, offers relevant insights into police investigation, prosecutorial decision-making, electronic documentation, and criminal appeals.

This article therefore undertakes a comparative analysis of the BNSS and the criminal procedural frameworks of the selected jurisdictions. It focuses on the principal stages of the criminal process, including jurisdiction, arrest, investigation, bail, trial management, electronic evidence, forensic procedures, victim rights, plea mechanisms, and appeals.⁴ The study examines whether the BNSS successfully balances the objectives of efficiency and crime control with the constitutional requirements of fairness, accountability, and individual liberty. It also identifies institutional and practical challenges that may affect the implementation of the new law.

The research adopts a doctrinal and comparative methodology. It analyses statutory provisions, judicial decisions, constitutional principles, official reports, policy documents, and relevant scholarly literature. The purpose is not to assume that the model of any one foreign jurisdiction can be directly transplanted into India, but to identify practices that may be adapted to Indian conditions.⁵ The article argues that the BNSS has the potential to modernise criminal procedure, but its success will depend upon effective judicial oversight, police accountability, adequate infrastructure, trained personnel, accessible legal aid, reliable forensic services, and strict protection of the rights of the accused and victims.

II. RESEARCH OBJECTIVES

- 1) To Comparatively analyse the criminal procedural laws of India, the United Kingdom, Singapore, Australia, Canada, and Malaysia, with particular reference to jurisdiction, arrest, investigation, bail, trial procedures, electronic evidence, and victim rights.
- 2) To Identify the similarities and differences between the BNSS and the criminal procedure frameworks of the selected common law jurisdictions.
- 3) To Evaluate the effectiveness of the BNSS in ensuring procedural efficiency, access to justice, judicial accountability, protection of fundamental rights, and timely disposal of criminal cases.
- 4) To Assess Whether the reforms introduced under the BNSS adequately balance efficient criminal justice administration with constitutional principles of due process, fairness, and individual liberty.
- 5) To Identify the practical challenges and limitations in the implementation of the BNSS and compare them with the experiences of the selected jurisdictions.

1. The Bharatiya Nagarik Suraksha Sanhita, 2023, Act No. 46 of 2023, Preamble and s. 1, India Code.

2. Ministry of Home Affairs, Government of India, The Bharatiya Nagarik Suraksha Sanhita, 2023: Legislative Background and Criminal Justice Reforms.

3. Criminal Procedure Rules 2025 (UK), Part 3, especially r. 3.2, concerning active case management, timetabling, avoidance of delay and use of technology.

4. Maneka Gandhi v. Union of India, (1978) 1 SCC 248 (fair, just and reasonable procedure).

III. METHODOLOGY

The research adopts a comparative analysis approach, utilizing both qualitative and quantitative data sources. Primary data is gathered from legislative documents, government reports, and legal commentaries on the BNSS, 2023. Secondary data includes scholarly articles, case studies, and international legal standards. The analysis focuses on key areas such as trial procedures, rights of the accused, victim protection, and technology integration. By systematically comparing these aspects, the study aims to provide a comprehensive evaluation of the reforms and their potential to transform the Indian justice system.

2.2 Bharatiya Nagarik Suraksha Sanhita 2023

The BNSS, 2023 represents a landmark reform in the Indian criminal justice system. It was enacted to address the limitations of the CrPC 1973 and to bring the procedural framework in line with contemporary legal standards and practices. Context of Enactment: The enactment of the BNSS, 2023⁶ was driven by the recognition that the existing procedural framework needed significant updates to address the challenges of the 21st century.⁷ The new code was introduced following extensive consultations with legal experts, policymakers, and civil society organisations, reflecting a broad consensus on the need for comprehensive reform. The aim was to create a more efficient, transparent, and responsive justice system that could better serve the needs of modern Indian society.⁸

IV. PRIMARY OBJECTIVES

- 1) **Enhancing Efficiency:** One of the primary objectives of the new code is to streamline criminal procedures, reducing delays and ensuring timely justice. This includes the introduction of stricter timelines for various stages of the criminal process and the use of technology to expedite proceedings.
- 2) **Strengthening Rights of the Accused:** The BNSS, 2023 aims to enhance the protection of the rights of the accused, incorporating international best practices and ensuring compliance with human rights standards. This includes more robust safeguards against arbitrary detention and improved access to legal representation.⁹
- 3) **Victim-Centric Approach:** The new code places a greater emphasis on the rights and protection of victims, introducing measures for victim support, compensation, and participation in the judicial process. This shift towards a more victim-centric approach is designed to ensure that the needs and rights of victims are adequately addressed.
- 4) **Technology Integration:** Recognizing the role of technology in modernising the justice system, the new code includes provisions for the use of digital tools in investigations, trials, and evidence management. This integration of technology is expected to enhance the efficiency and transparency of the judicial process.
- 5) **Transparency and Accountability:** The BNSS, 2023 seeks to enhance transparency and accountability in the criminal justice process. It includes provisions to ensure that all stakeholders, including law enforcement agencies and the judiciary, adhere to the highest standards of conduct. By addressing the limitations of the CrPC 1973 and incorporating contemporary legal principles, the BNSS, 2023 aims to create a more effective and equitable justice system in India. This comprehensive reform is expected to have far-reaching implications for the administration of criminal justice, aligning it with global standards and best practices.
- 6) **Case of DEF vs. State:** Under the CrPC 1973, an accused individual faced prolonged pre trial detention due to delays in the judicial process. After the implementation of BNSS, 2023, similar cases are now being resolved more quickly, with the accused receiving timely legal representation and fair treatment throughout the trial process.
- 7) **Case of GHI vs. State:** A case involving allegations of police misconduct was handled more transparently under BNSS 2023, with the accused receiving adequate legal representation and the trial being conducted in a fair and impartial manner. The reforms in Sections 102 and 115 ensured that the accused's rights were protected and that the trial was conducted without bias.

A. United Kingdom

Criminal Procedure Rules (CPR): The UK's CPR emphasizes the efficient management of cases, the use of technology, and the protection of victims' rights. The BNSS 2023 mirrors these principles by incorporating digital case management (Section 200) and victim support services (Section 150).¹⁰ The UK's approach to case management, which includes pre-trial reviews and strict timelines, is reflected in BNSS 2023's emphasis on speedy trials (Section 130).

5. Bharatiya Nagarik Suraksha Sanhita, 2023, provisions relating to investigation, trial and technological integration.

6. Bharatiya Nagarik Suraksha Sanhita, 2023, provisions relating to speedy investigation and trial.

7. Constitution of India, 1950, arts. 14 and 21.

8. D.K. Basu v. State of West Bengal, (1997) 1 SCC 416.

9. Joginder Kumar v. State of U.P., (1994) 4 SCC 260 (arrest and protection of individual liberty).

10. United Kingdom, Criminal Procedure Rules.

B. United States

Federal Rules of Criminal Procedure: The US system emphasizes the right to a fair trial, including the right to legal representation and the protection against arbitrary detention. BNSS 2023 aligns with these principles through Sections 102 and 115¹¹, which ensure legal representation and judicial oversight of detentions. The use of technology in the US judicial system, such as electronic filing and virtual hearings, is incorporated into BNSS 2023 through Sections 200 and 230.¹²

C. Australia

Criminal Procedure Act 2009 (Victoria): This Act emphasizes the use of technology and the protection of victims' rights. BNSS 2023 adopts similar measures, including digital case management (Section 200) and comprehensive victim support services (Section 150).¹³

Australia's focus on victim participation in the judicial process is mirrored in BNSS 2023's provisions for victim impact statements and participation in hearings (Section 165).¹⁴

D. Malaysia

Criminal Procedure Code (Act 593): Malaysia's Criminal Procedure Code emphasizes efficient criminal investigations, judicial supervision of arrests, plea bargaining, and the admissibility of electronic evidence. Similar to these provisions, the BNSS, 2023 promotes technology-driven investigations, electronic records, forensic evidence, and time-bound criminal proceedings while ensuring judicial oversight over arrests and investigations.

Malaysia has strengthened the use of digital case management systems, electronic documentation, and specialized courts to expedite criminal proceedings.

The BNSS reflects these practices through provisions relating to electronic First Information Reports (e-FIRs), digital recording of evidence, electronic summons, video conferencing, and mandatory forensic investigation for specified offences, thereby enhancing procedural efficiency and transparency.¹⁵

Investigation and Arrest: Criminal investigations are generally conducted by the Royal Malaysia Police (PDRM) or other enforcement agencies. Arrests can be made if there is reasonable suspicion that a person has committed a crime, and the arrested individual has the right to remain silent and consult a lawyer under Section 28A of the Criminal Procedure Code.¹⁶

E. Singapore

Criminal Procedure Code, 2010: Singapore's Criminal Procedure Code is recognized for its efficient investigation process, structured case management, plea bargaining mechanisms, victim protection measures, and extensive integration of technology into criminal proceedings.¹⁷ The BNSS, 2023 adopts similar principles by introducing electronic communication of judicial processes, digital evidence management, victim-centric provisions, and timelines for investigation and trial. Singapore's criminal justice system extensively utilizes e-litigation platforms, virtual court hearings, electronic filing systems, and judicial case management to reduce delays. The BNSS¹⁸ similarly promotes digitization through electronic FIRs, video conferencing, electronic summons, digital charge sheets, and online case management, aiming to improve access to justice and reduce procedural delays.¹⁹

F. Canada

Criminal Code of Canada and Criminal Procedure Framework: Canada's criminal procedure emphasizes the protection of constitutional rights, judicial independence, fair trial

11. United States, Federal Rules of Criminal Procedure.

12. Constitution of India, 1950, arts. 14 and 21.

13. Australia, Criminal Procedure Act 2009 (Victoria).

14. Australia, Victims' Charter Act 2006 (Victoria).

15. Malaysia, Criminal Procedure Code (Act 593).

16. Criminal Procedure Code (Act 593), s. 28A (rights of arrested persons).

17. Bharatiya Nagarik Suraksha Sanhita, 2023, provisions concerning electronic FIRs and digital investigation.

18. Bharatiya Nagarik Suraksha Sanhita, 2023, provisions relating to electronic summons and video conferencing.

19. Singapore, Criminal Procedure Code 2010.

guarantees, disclosure obligations, and victim participation throughout criminal proceedings. The BNSS, 2023 similarly strengthens procedural safeguards by ensuring judicial oversight of arrests, legal aid, victim participation, and transparent investigation procedures while introducing reforms for efficient criminal justice delivery.²⁰ Canada has adopted integrated digital court systems, electronic filing, alternative dispute resolution in appropriate criminal matters, and robust victim support services to enhance judicial efficiency. The BNSS incorporates comparable reforms through digital case management, electronic recording of evidence, use of audio-video technology during proceedings, and enhanced victim rights, thereby seeking to modernize India's criminal justice administration while maintaining procedural fairness.²¹

V. IMPLICATIONS

The reforms under BNSS 2023²² have far-reaching implications for the Indian justice system. By addressing procedural delays and enhancing the efficiency of case management, the new code aims to reduce the backlog of cases and ensure timely justice. The emphasis on the rights of the accused and victim protection fosters a more balanced and fair judicial process. The integration of technology not only modernizes the judicial system but also makes it more accessible and transparent. These changes are expected to build public trust in the justice system and promote a culture of accountability and fairness.

VI. FUTURE RESEARCH

While BNSS 2023 marks a significant step forward, there are areas that warrant further research and potential future reforms. These include:

- 1) Impact Assessment: Conducting comprehensive studies to assess the real-world impact of the reforms on case outcomes, trial durations, and stakeholder satisfaction.
- 2) Technology Integration: Exploring advanced technologies, such as artificial intelligence and blockchain, to further enhance the efficiency and security of judicial processes.
- 3) Victim Support: Investigating additional measures to support victims, particularly in cases involving cybercrime and domestic violence.
- 4) Training and Capacity Building: Evaluating the effectiveness of training programs for judicial officers and law enforcement personnel to ensure they are well-equipped to implement the new code.
- 5) Public Awareness: Developing strategies to increase public awareness and understanding of the new legal provisions and their implications. In conclusion, the BNSS 2023 represents a transformative shift in India's approach to criminal justice, aligning it with global standards and best practices. The new code is demonstrably better than the CrPC 1973, addressing its shortcomings and introducing reforms that promise to yield 45

VII. CONCLUSION

The Bharatiya Nagarik Suraksha Sanhita, 2023 represents an important stage in the continuing reform of India's criminal justice system. By replacing the Code of Criminal Procedure, 1973, the BNSS attempts to respond to longstanding concerns relating to procedural delay, technological inadequacy, ineffective investigation, limited victim participation, and the need for more efficient case management. Its emphasis on electronic communication, audio-video proceedings, digital records, forensic investigation, time-bound procedures, and victim-oriented measures reflects an effort to bring criminal procedure into closer alignment with the demands of a modern justice system. The comparative analysis demonstrates that several features of the BNSS correspond with developments in other common law jurisdictions. The United Kingdom's experience highlights the importance of judicial case management, pre-trial review, and clearly defined procedural responsibilities. Singapore demonstrates how digital court infrastructure, electronic filing, and systematic case management can reduce delay and improve administrative efficiency. Australia provides useful lessons regarding victim participation and victim-sensitive procedures. Canada illustrates the importance of constitutional safeguards, disclosure obligations, judicial independence, and fair-trial guarantees. Malaysia offers comparatively relevant insights concerning criminal investigation, arrest safeguards, prosecutorial decision-making, electronic documentation, and appellate review. At the same time, the comparison reveals that procedural efficiency must not be treated as a substitute for constitutional protection.

20.Canada, Criminal Code, RSC 1985, c C-46.

21.Canadian Charter of Rights and Freedoms, ss. 7 and 11.

22.Bharatiya Nagarik Suraksha Sanhita, 2023, provisions concerning technological integration, victim rights and procedural safeguards.

Speedy investigation and trial are valuable only when they are accompanied by fairness, impartiality, adequate legal representation, meaningful judicial supervision, and protection against arbitrary arrest and detention. The use of digital technology must be supported by reliable infrastructure, data-security safeguards, clear rules regarding the authenticity and admissibility of electronic evidence, and effective mechanisms to prevent manipulation or unauthorised access. Without these safeguards, technological modernisation may increase procedural inequality or create new forms of injustice.

The BNSS also requires careful implementation in relation to vulnerable groups, including persons in custody, economically disadvantaged accused persons, women, children, persons with disabilities, and victims of sexual and domestic violence. Victim-oriented reforms should promote participation, information, protection, and compensation without undermining the presumption of innocence or the procedural rights of the accused. Similarly, the effectiveness of forensic and digital investigation will depend upon the independence, competence, and accountability of investigative agencies and forensic institutions. Accordingly, the BNSS should be understood not as a complete solution to India's criminal justice problems but as a legislative framework whose success depends upon institutional support. The following measures are essential: strengthening police and judicial infrastructure; expanding legal-aid services; improving forensic capacity; establishing secure and interoperable digital court systems; providing continuous training to judges, prosecutors, police officers, and defence lawyers; developing clear data-protection standards; ensuring effective witness and victim protection; and publishing reliable performance data concerning investigation and trial timelines.

In conclusion, the BNSS, 2023 has the potential to transform India's criminal procedural system by combining legal modernisation with technological innovation and greater attention to victims' interests. Nevertheless, its legitimacy and effectiveness will ultimately be judged by its practical impact on liberty, equality, accountability, and access to justice. India can draw valuable lessons from the United Kingdom, Singapore, Australia, Canada, and Malaysia, but comparative practices must be adapted to India's constitutional framework, social conditions, institutional capacities, and federal structure. A successful criminal justice reform must therefore pursue a balanced objective: efficient administration of justice, effective crime control, meaningful victim participation, and unwavering protection of due process and individual rights.

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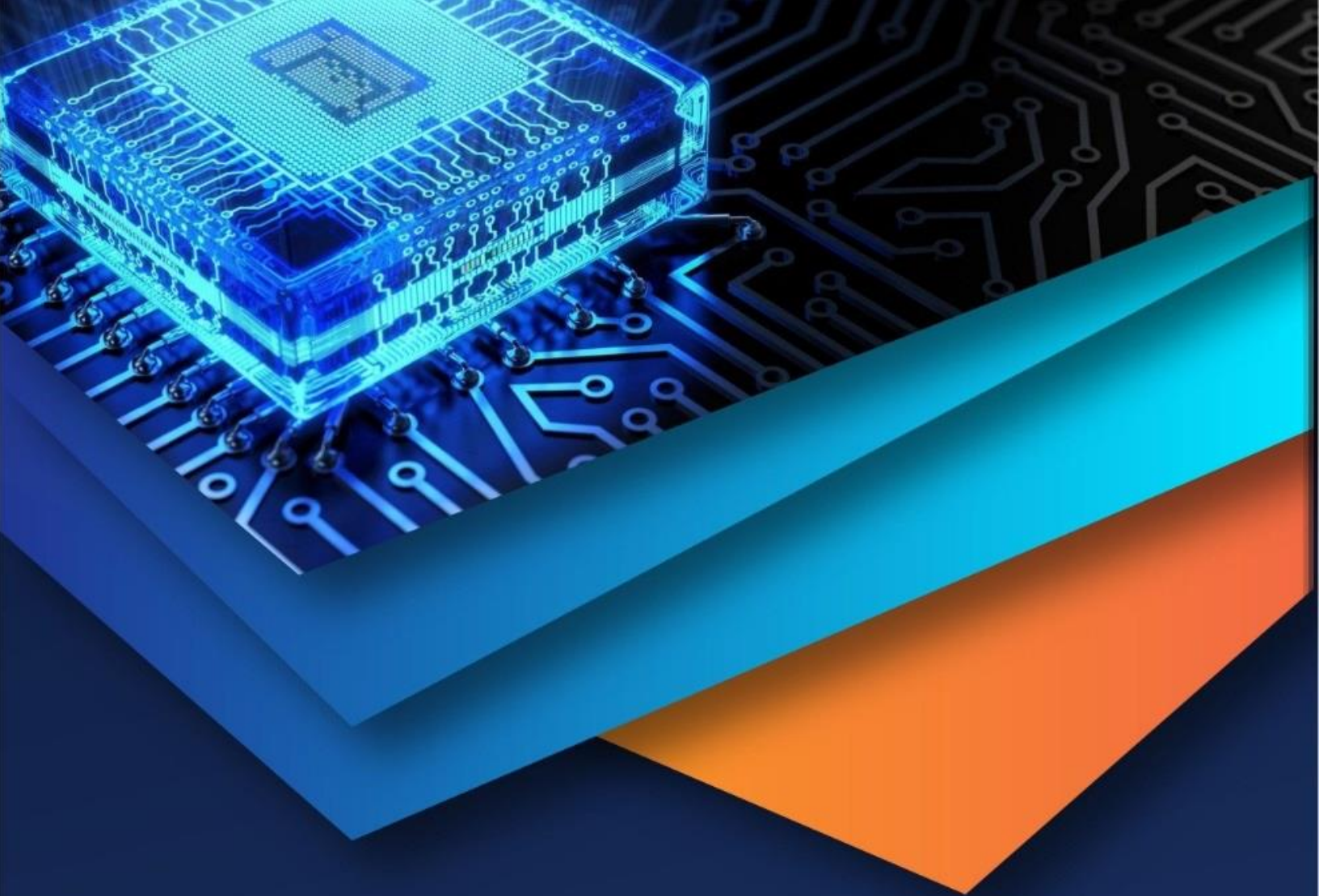
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