

Barriers to Justice: The Non-Registration of FIRs in Pakistan and Its Impact on Society

Shahzad Manzoor Khan ¹, Seemin Saeed ², Jamil Ahmad Khokhar ³, Hassan Ahmad ⁴

¹ Lecturer, Southern School of Law, University of Southern Punjab, Multan Email: shahzadmanzoor47@gmail.com

² Lecturer Lahore Leads University, Lahore Email: seeminkhaqan@gmail.com

³ Lecturer, Lahore Leads University, Lahore Email: jamilkhokhar01@gmail.com

⁴ Advocate High Court hissanahmad62@gmail.com

Hassan Ahmad (Corresponding Author)

DOI: <https://doi.org/10.70670/sra.v3i1.549>

Abstract

According to Section 154 of the Criminal Procedure Code, every victim has the right to request the police station chief to initiate legal action against the accused individuals on their behalf. The First Information Reports (FIRs) is first step in the criminal justice system of Pakistan regarding the recorded of an act which is prohibited by the law. This study thoroughly examines the issues and outcomes of not registering First Information Reports (FIRs) with a particular focus on the social and legal ramifications. This study examined through the doctrinal legal research methodology to investigate influential legal texts and court rulings. The objectives of this study complimentary include analyzing social norms, evaluating the impact on the judicial system, and scrutinizing the fundamental legal structure. The findings illustrate the influence of systemic difficulties, such as refusals, delays and corruption in FIR registration procedures, on victim rights, case outcomes, and public confidence. Suggestions for tackling these issues while upholding principles of justice including bolstering police training, increasing infrastructure, and promoting more community involvement.

Keywords: First Information Report; Delays, Refusals, Criminal justice System; Police.

Introduction

A crime or offence which is prohibited by State is initiated after the complainant get register a complaint, that complaint when get registered is called FIR according to Sec 154 CrPC. If complainant gives orally statement to an in charge regarding the commission of cognizable offense in this situation an in charge is duty to reduce in writing by him under direction and also read over to the informant. Section 154 facilitates the act of informing the Station House Officer (S.H.O.) at a police station of a cognizable crime and initiating the subsequent legal proceedings. (MLD, 2013) Nevertheless, the information provided in the FIR should not be the only factor taken into account for deciding the outcome for the persons included in it. (P.Cr.L.J, 2012). Station House Officers (SHOs) are authorized to lodge formal complaints, known as First Information Reports (FIRs), when the first informant, the person who has suffered harm or been impacted, gives relevant information. The victim must formally petition the SHO to initiate a criminal prosecution against the accused, regardless of their identification, based on the allegation that they have engaged in unlawful activity. Upon receiving such information, it is the duty of the officer to record the case

in a log that is kept at the station. The station's daily notebook also contains a report that provides specific information such as the report number, time, and date (Zahir, 2023).

According to Section 154 of the Criminal Procedure Code, every victim has the right to request the police station chief to initiate legal action against the accused individuals on their behalf. An FIR is a written document that provides the rationale for initiating an inquiry and contains the essential background material required to construct a criminal case. Its importance cannot be exaggerated. Upon becoming aware of the occurrence of a punishable crime, a law enforcement official is obligated to commence an inquiry in accordance with Section 154 of the Criminal Procedure Code. The responsibility to precisely and impartially document the FIR lies with the police officer, since it is the only means to carry out a thorough investigation (Attorney, 2022)

The First Information Report (FIR) is an essential component of any criminal investigation as it provides a concise summary of crucial facts that are presented to the court for examination. It is a crucial element of the legal system in Pakistani courts. All citizens of Pakistan are given the right to file a FIR in relation to any criminal crime committed against them. Nevertheless, the FIR registration procedure often leads to delays in case settlement as a result of several challenges. The wording used in FIRs, especially when written by inexperienced police personnel, seems to be a significant contributing reason to these delays. The terminology used in FIRs has a significant impact on criminal prosecutions. Solicitors primarily depend on a comprehensive understanding of FIR contents to effectively pursue criminal prosecutions. The issue lies in the fact that the phrasing used in these publications may sometimes be ambiguous and difficult to interpret. Hence, a comprehensive examination is necessary to understand the structure and intricacies of FIR language. This study illuminates the distinctive characteristics of this genre by examining the language used in FIRs filed to various police stations. The objective of this study is to elucidate these characteristics and provide recommendations for enhancing the accessibility and comprehensibility of FIR language for all parties involved.

Materials and Methods

The primary method used in this study on the failure to register First Information Reports (FIR) in Pakistan is document analysis using a doctrinal legal research methodology. Initially, researchers examine many crucial legal texts, such as the Constitution, legislation like the Criminal Procedure Code, Police order 2002 and police rules and regulations 1934. A comprehensive understanding of legal interpretations and the potential ramifications of filing a formal complaint may be enhanced by using original data obtained from court judgments. Furthermore, secondary sources such as research articles, news sources, internet platforms, and community publications are used to enhance the legal analysis by providing comprehensive contextual insights and real-world scenarios. The study seeks to illuminate the social and legal consequences of not registering FIRs by combining and evaluating this extensive dataset. These consequences include effects on human rights and the ability to seek legal redress, repercussions for the integrity of law enforcement and the public's confidence in the judicial system, and further outcomes.

The Significance of the First Information Report (F.I.R.) in the Criminal Justice System

Police prepared as an FIR in written form on the basis of receiving information regarding the committing the serious crime which is fall under their jurisdiction. An FIR is the initial and fundamental step in reporting the violation of an act which is prohibited by the law and plays significant role in the criminal justice system of Pakistan because of whole legal process is based on the First information report. Firstly the FIR is initiated to immediately regarding the registered of the case and secondly empowered to investigation officer for the collection of evidence and thirdly FIR effected until the pronounced the judgment by the criminal court of law. The F.I.R. is a significant document which is plays vital role in the whole legal process. A weak foundation can

disrupt the criminal justice system, making it extremely difficult for prosecutors to introduce new evidence or arguments. When preparing a FIR it is essential to include the necessary requirements in exact accordance with the Code of Criminal Procedure (Khan, A., Iqbal, N., & Ahmad, I. 2022). Regarding the prudence of evidence by the prosecution against the accused in this situation FIR is the most important document in a criminal case. FIR is made soon as possible after the occurrence of an act which is prohibited by the law in lens of fresh memory however FIR is playing crucial role in the criminal investigation (Anwar, A., & Hussain, B. 2022)

Assessing the Evidentiary Value of an F.I.R. in Criminal Justice

The Supreme Court of Pakistan verdict in the case of PLD 2016 SC 17 highlights an important aspect of the law concerning FIRs. Although first-hand reports of suspected conduct are vital initial documentation in criminal proceedings, the FIRs have low evidentiary value. FIRs, which should not be mistaken for solid evidence, are often utilized as starting points for further investigations. Their objective is to elicit a reaction from law enforcement in order to commence legal proceedings. The information included in a Form FIR should not be considered as conclusive proof of the events it describes. On the contrary, it facilitates further investigation and the accumulation of more robust evidence. The significance of presenting corroborating evidence and adhering to proper legal processes to establish culpability or innocence in court proceedings is emphasized by this distinction, which goes beyond the first facts presented in a formal complaint (Ahmed, F. 2017).

The Impact of Delayed FIR Filing on Judicial Proceedings

Although it is legally required for police agencies to impartially and promptly record First Information Reports (FIRs), there are several reasons why this is seldom observed in reality. Police officers may intentionally delay or fail to FIRs in order to hide their bad performance or decrease the burden of increased duty, since a larger number of FIRs might potentially affect their level of responsibility (Ahmed, F. 2017). Moreover, prominent individuals in society and politics may have disproportionate influence on law enforcement owing to their ability to use their connections in order to circumvent formal grievances. The inefficacy of the criminal justice system and the degradation of the rule of law originate from these structural deficiencies, which in turn sustain the cycle of injustice and impunity (Ahmed, S. 2018). Delays in filing a FIR may have a substantial influence on the prosecution's case, typically benefiting the accused. The argument stems from the fact that such delays might provide the accused the chance to corroborate their facts or manipulate the court system in their favour (Iqbal, A. 2023). The Supreme Court emphasized in PLD 2019 SC 64 that any unjustifiable delay in filing a formal complaint raises doubts, which often work in favour of the accused. Nevertheless, if a legitimate justification for the delay can be shown, such as the urgent need to transfer a wounded individual to another city or hospital, the prosecution's argument will remain unaltered. Assessing the potential effects of delays on criminal proceedings is a complex matter. In such situations, prioritising the protection of the affected person's life or well-being is more important than filing a formal complaint.

Types of delay in lodging FIR

Firstly, the informant failed to quickly submit a FIR although there is no legally mandated or regulated time period for submitting a FIR once a crime has been committed, it is widely agreed upon that it should be done promptly. Ultimately, the court will take into account the particulars of each case in determining the appropriate duration for submitting a FIR. When determining an acceptable filing date, many variables will be considered, including the gravity of the offence, the availability of pertinent evidence, and the time limitations of the case. The timely filing of a FIR

is crucial to the legal process, irrespective of the lack of a fixed date, since it enables investigation and ensures the integrity of criminal proceedings (Kanwel, S. & Ayub, N. 2023).

Secondly in accordance with Section 154(1) of the Criminal Procedure Code, it was improper for the station house officer to delay the filing of the FIR. This is because anytime an informant offers information on a legitimate crime; the officer is required to file a FIR. This activity is imperative, as the phrase "must" is used to highlight in the sentence. If the police officer declines to document the FIR in accordance with Section 154(3), the informant has the alternative to compose the particulars and provide them to the superintendent of police (Arain, S. M., & Arain, A. M. 2015). The superintendent of police has the power to commence an investigation or assign it to a subordinate officer, based on their conviction that illicit behavior is occurring. In the event that the police fail to submit the FIR, the person providing the information may still go to a court or metropolitan magistrate to seek its registration and investigation, as specified in Section 156(3) and Section 190 of the Cr.P.C. It is important to note that, independent of any jurisdictional challenges, a police officer faces the possibility of being sentenced to one year in jail for failing to file an accurate report. This legislative framework guarantees that victims may readily access justice and that law enforcement officers are held responsible (Anwar, A., & Hussain, B. 2022).

Thirdly the Police are required to adhere to the rules outlined in Section 157 of the Criminal Procedure Code in order to initiate a preliminary inquiry after the filing of the FIR to the magistrate. The magistrate has the authority to investigate cognizable offences based on police reports. Consequently, as soon as a police officer becomes aware of or suspects the commission of such an infraction, they are obligated to inform the magistrate. All of this falls under the jurisdiction of Section 156 (PLD, 2017). The State Government has the authority to designate which lower-level officials are subject to this reporting requirement. Significantly, the magistrate is provided with a duplicate of the FIR as a component of the internal and external verifications mandated by the Criminal Procedure Code (Cr.P.C.). If there is a delay in relaying this material, it might affect the credibility of the case. This delay may raise suspicions of possible manipulation or involvement by the prosecution. In order to safeguard the evidence and strengthen the prosecution's argument, it is crucial for the magistrate to promptly get the FIR thereby mitigating these risks (SCMR, 2021). The promptness with which the FIR is filed may have a considerable influence on the prosecution's case and the credibility of the complainant, resulting in different outcomes depending on the nature of the offence. The sensitivity of the problems and cultural norms imply that the prosecution of rape and sexual harassment cases would not be significantly impeded by a delay in submitting a FIR. Crimes pertaining to theft or attempted murder need the immediate lodging of a FIR to gather evidence and verify facts. Any unexplained delay has the potential to damage the credibility of criminal proceedings since it allows for suspicions of manipulation and hampers the prosecution's capacity to gather evidence. Hence, it is imperative to promptly submit a legal complaint (SCMR, 2014).

The Crisis of Non-Registration of FIRs in Pakistan: Legal and Social Dimensions

In Pakistan, common people may face the following problems when trying to register an FIR with the police:

Firstly, refusal to register FIRs is a significant issue, often due to a lack of evidence, political interference, or personal biases among police officers. This denial of justice undermines the trust citizens have in law enforcement and can lead to the perpetuation of crimes (Anwar, M. 2017).

Secondly, delay in registering FIRs is another prevalent problem, causing crucial evidence to be lost and perpetrators to escape justice. Victims may suffer further harm during this waiting period, exacerbating their trauma and making it harder to seek justice (Shabbir, S. S. 2022).

Thirdly, harassment and intimidation faced by complainants from police officials or influential individuals deter them from pursuing legal recourse, violating their rights and perpetuating a culture of fear and impunity (Tahir, A. 2020).

Fourthly, bribery and corruption in the process of registering or pursuing cases undermine the integrity of the criminal justice system and erode public trust in law enforcement.

Fifthly, lack of transparency from police about the investigation process or case progress creates frustration and mistrust among the public, further diminishing confidence in the system.

Sixthly, inadequate investigation by police results in weak cases or wrongful acquittals, denying victims' justice and emboldening criminals (Aijaz, R. 2019).

Seventhly, the influence of power dynamics, where wealthy or influential individuals pressure police to ignore or downplay cases, leads to unequal treatment under the law and perpetuates a sense of injustice (Ali, I. 2018).

Eighthly, gender bias in registering cases related to gender-based violence or harassment discourages victims from seeking help and perpetuates a cycle of abuse (Khan, N. A., & Lohano, H. 2020).

Ninthly, lack of access to justice for marginalized communities due to poverty, discrimination, or lack of awareness about their rights further marginalizes them within society (Nazim, S. 2022).

Tenthly, fear of retaliation from perpetrators or their associates deters victims from reporting crimes, allowing offenders to act with impunity and perpetuate cycles of violence (Raza, A., & Khan, A. 2023).

Eleventhly, language barriers hinder the reporting and investigation of crimes, particularly in multicultural communities, where effective communication with police officials may be difficult (Mahmood, S., & Mirza, K. H. 2016).

Lastly, overburdened police stations struggle to handle the volume of cases, leading to delays, inefficiencies, and frustration among citizens seeking justice. Addressing these challenges requires systemic reforms, including training police officers in ethics and accountability, improving access to justice for marginalized communities, and strengthening oversight mechanisms to prevent abuse of power and corruption within law enforcement agencies (Aijaz, R. 2019).

Losses suffered by an aggrieved person regarding refusal or delayed of FIR

Firstly it is unjust since victims are deprived of legal redress when there is a delay or denial in registering a FIR. An erosion of law and order occurs, leading to the continuation of lawlessness and the erosion of trust in the efficacy of the criminal justice system (Rustam, 2020).

Secondly the apathy shown by the government might potentially inflict significant psychological anguish onto the victims. Formal complaints may experience delays or be rejected, perhaps intensifying feelings of fear, panic, and trauma. This is especially true if the victim perceives that the authorities are not treating their case with the appropriate level of seriousness (Tahir, 2021).

Thirdly the absence of vital evidence is a substantial outcome of a FIR that is either rejected or submitted beyond the deadline. Delaying the recording of an occurrence may lead to the loss or destruction of crucial evidence, which in turn hampers the ability to carry out a comprehensive investigation and prosecution (SCMR, 2006).

Fourthly it is important to note that if a request for FIR registration is denied, there is a possibility that violence may continue. Inaction may embolden the perpetrators, leading to escalated harassment or abuse against the victim, so jeopardizing their safety and well-being to a larger extent (Tahir, 2021).

Fifthly victims may have monetary setbacks in the event that their First Information Report (FIR) registration is denied or postponed. Expenses falling under this category may include expenditures

such as medical consultations, prescribed medications, income forgone, and legal charges accrued during the pursuit of other means of seeking compensation (2010 P. Cr. L. J. 1466).

Sixthly those who experience gender-based violence are more prone to experiencing societal stigma. In the absence of a formal complaint from authorities, the victim may experience more isolation and suffering as they are ostracized or viewed with suspicion by their community. (Arshad, 2017).

Seventhly the absence of adequate safeguards is a significant issue when a FIR is either not filed or is delayed. The absence of a documented record of the occurrence exposes victims to more acts of aggression, as law enforcement may fail to provide the required assistance or protection (Riaz & Khan, 2018)

Eighthly if an individual's FIR is denied or postponed, it may lead to a loss of trust in the government and the criminal justice system. The gravity and proper management of victim grievances directly impact the likelihood of victims collaborating with law enforcement in subsequent instances (Hussain, A., Akhtar, S., & Hassan, M. 2021).

The lack or delay in making a formal complaint may also result in a lengthy pursuit of justice. Victims may encounter protracted and demanding legal procedures or explore other avenues before attaining justice, all of which contribute to increased stress, financial burden, and time consumption.

Legal Recourse for Victims When Police Deny FIR Registration

If a victim believes that the rejection was illegal or illogical, they may first contact the Superintendent of Police (SP), who has the power to require the creation of a written report, with their complaint (Husan,S. 2022).

Moreover in the event that the SP fails to take any measures, the victim has the option to approach the Deputy Inspector General (DIG) of the respective police department to file a formal complaint. If required, the DIG may intervene and guarantee quick lodging of the FIR.

Ultimately, the victim has the choice to directly approach the Inspector General of Police (IGP), who has the authority to oversee the activities of the officers under their supervision, as the third alternative. The Inspector General of Police (IGP) has the authority to impose disciplinary measures on the personnel who are accountable (Tovar, M., & Lin, L. S. 2022). Once all other administrative options have been completely used, the victim might choose to submit a writ petition to the Lahore High Court in order to seek resolution via the legal system. The court has the jurisdiction to mandate the submission of the First Information Report (FIR) and oversee the inquiry into the issue (Hussain, N., Khan, A., & Chandio, L. A. 2023).

In addition the victim has the opportunity to request the intervention of the District and Sessions Judge. The court is responsible for both registering the FIR and overseeing a thorough investigation. The victim initiating a private complaint with the court, alleging that the police neglected to document a formal report despite being requested to do so. This may be done after all other options have been completely used up. This legal action has the ability to compel the government to treat the situation with seriousness and urgency (Bhardwaj, 2023)

Furthermore, the victim has the choice to initiate legal action against the accountable police personnel in a civil court or file a criminal complaint. This may mean pursuing compensation for the harm caused due to the officers' hesitancy in submitting the FIR, or it might entail lodging criminal complaints against them. As an alternative, victims have the opportunity to seek assistance from the National Commission for Human Rights (NCHR), which is responsible for examining claims of human rights abuses, particularly those related to police brutality (Husan,S. 2022).

Identifying Gaps in Law Enforcement: Issues in Implementation and Reform

Firstly, there is an insufficiency in training and the development of skills and abilities. Police personnel need periodic and thorough training courses to refine their abilities, enhance their knowledge, and are prepared to manage any situation that arises (2010 P. Cr. L. J. 1466)

A second concern is the problem of police corruption and misconduct, which may be tackled by implementing strong systems of accountability that effectively discourage and penalize dishonest conduct, while also promoting an atmosphere of trust and integrity. Insufficient infrastructure and resources hinder the ability of police forces to effectively carry out investigations and prosecutions. To ensure their success, it is crucial to provide them with the necessary infrastructure, technical assistance, and resources (Khan, S., Ahmed, A., & Ahmed, K. 2021).

Thirdly it is essential to enhance forensic skills and investigation tactics to bolster legal cases and minimize the probability of acquittals resulting from insufficient evidence. Furthermore, to ensure fair and equal treatment of all persons, irrespective of their backgrounds, law enforcement organizations should implement cultural transformations and implement targeted training initiatives to address prejudice and discrimination (Husan, S. 2022).

Fourthly the community lacks sufficient trust and engagement which is establishing trust and fostering community engagement are essential for proactive crime prevention, efficient dispute resolution, and the development of beneficial relationships between the public and law enforcement (Malik, N., & Qureshi, T. A. 2021).

The fifthly problem is to the use of ineffective approaches in addressing complaints to maintain public trust in law enforcement and ensure prompt resolution of concerns, it is essential to establish complaint redressed processes that are both efficient and easily accessible. To guarantee equitable treatment of persons and maintain unbiased investigations, it is crucial to protect police agencies from political involvement and unwarranted pressure. The lack of accountability and transparency is the ninth issue. In order to instill public confidence in law enforcement, it is essential that police operations and decision-making procedures be characterized by transparency and accountability. To ensure the effectiveness and currency of law enforcement agencies in dealing with changing threats, it is necessary to update longstanding rules and procedures to handle modern criminal behavior and associated problems (Qureshi, G. M., Chaudhary, F., & Ashfaq, M. 2023).

Finally is the absence of expertise in forensic science, which hinders law enforcement from carrying out comprehensive and definitive investigations and weakens the reliability of evidence in court. This factor pertains to the substantial caseload and workload that need skillful management in order to avoid police officers from experiencing burnout and to maintain the quality of their investigations and services. Addressing these concerns thoroughly is crucial for strengthening public safety, improving law enforcement procedures, and upholding the principles of societal governance (Hussain, A., Akhtar, S., & Hassan, M. 2021).

Recommendations and Conclusion

Firstly, one effective method to guarantee the progression of police officers in their professional paths is to enact legislation that requires frequent training on diverse facets of law enforcement, such as human rights and investigation methodologies. A specific police training school that provides specialist training may fulfill the requirements of law enforcement officers.

Secondly individuals have the option to use an autonomous grievance entity to notify the authorities of corruption or other types of wrongdoing. This will result in impartial investigations and ensure that officials are held responsible. Enacting law is a means to accomplish this objective. Whistleblower protection laws guarantee that law enforcement officials may disclose unethical conduct without facing any kind of reprisal.

Thirdly in order to enable law enforcement organizations to fulfill their responsibilities efficiently, it is essential to provide enough finances for enhancing physical infrastructure and modernizing

police departments. Police agencies may improve their capacity to collect and evaluate evidence by developing a forensic science laboratory and a digital evidence collection system.

Fourthly the enactment of a law requiring uniform protocols for criminal investigations guarantees uniformity and excellence. Specialized training programs for crime scene investigation improve police officers' ability to collect and preserve evidence. In addition, the final advantage of legalizing bias and prejudice in the police force is that it fosters impartiality and objectivity in the performance of their duties. The user did not provide any text. Police personnel may acquire the ability to identify and overcome prejudice in their encounters with other populations by engaging in diversity and inclusion training. community policing venues promote trust and collaboration by facilitating reciprocal contact between the public and law enforcement. When laws requiring police departments to participate in community outreach and trust-building initiatives are implemented, they become more dedicated to serving and safeguarding the rights of all people.

Fifthly if legislation is enacted to create an impartial complaint redressed organization, individuals will have a legal means to report instances of police wrongdoing or incompetence. Implementing an online platform for the public to file complaints against police personnel might enhance efficiency and accessibility of the process. Furthermore, laws that protect investigations conducted by law enforcement from political intervention guarantee their impartiality and independence. Enacting legislation to create an impartial police oversight board guarantees openness and accountability within the police force. Finally, by requiring police agencies to provide crime figures and yearly reports, we can enhance openness and ensure accountability within the police force . The use of dashboard cameras (dash cams) and body cameras by law enforcement officials enhances transparency and responsibility by documenting their engagements with the general public. Finally, the adoption of laws to modernize criminal proceedings and evidence collection will provide law enforcement authorities with the necessary legal foundation to effectively handle current challenges. The responsibility for creating and regularly reviewing laws should be given to a law reform commission to guarantee that legal structures stay up-to-date and flexible to meet evolving social demands. Furthermore, the creation of a national forensic science laboratory strengthens the ability of law enforcement organizations to carry out intricate forensic examinations. The legislation improves the precision and reliability of criminal investigations by integrating DNA profiling and other advanced forensic technology. Implementing regulations to restrict the workloads and caseloads of police officers guarantees their ability to efficiently handle their duties and create clear priorities. Legislative action may establish a case management system to alleviate administrative constraints on law enforcement and expedite investigations. Collectively, these policies and legislation aim to enhance the criminal justice system by addressing concerns related to the implementation and enforcement of laws. The research highlighted the intricate network of social and legal elements that contribute to the non-registration of FIRs in Pakistan. The process of lodging First Information Reports (FIRs) is hindered by instances of denials, protraction, and graft, so undermining public confidence in the criminal justice system and impeding the dispensation of justice. In order to address these issues, it is imperative that we implement substantial reforms, such as boosting the training of law enforcement personnel, modernizing infrastructure, and fostering more community engagement. To enhance its legal framework and promote equal access to justice, Pakistan should priorities accountability, transparency, and empowering victims. In order for Pakistan to undertake significant transition and uphold its rule of law, legislators, law enforcement agencies, and civil society would need to persist in their efforts.

References

Ahmed, F. (2017). Challenges Faced by Criminal Justice System in Pakistan. *International Journal of Humanities and Social Science Research*, 6(1), 1-8.

- Ali, I. (2018). Criminal Prosecution System of Pakistan: The Need for Reforms. *Journal of Islamic Banking and Finance*, 35(2), 1-11.
- Anwar, M. (2017). The Political Interference in Police Functioning in Pakistan: An Empirical Analysis. *Journal of Political Studies*, 24(1), 51-64
- Adnan Prince v The State [2017] PLDSC 147.
- Ahmed, S. (2018). Corruption in the criminal justice system: A comparative analysis of Pakistan and India. *European Journal of Law and Public Administration*, 5(2), 173-186.
- Aijaz, A. (2019). Criminal justice system in Pakistan: A critical analysis of challenges and reforms. *Journal of Law and Criminal Justice*, 7(1), 116-131.
- Aijaz, R. (2019). Police Reforms in Pakistan: An Analysis of Performance and Outcomes. *Journal of Policing, Intelligence and Counter Terrorism*, 14(1), 49-63
- Amjad Khan v the State [2021] SCMR 1458
- Anwar, A., & Hussain, B. (2022). Women Empowerment through Enhanced Role of Women Police: A Case
- Arain, S. M., & Arain, A. M. (2015). National Highways and Motorway Police in Pakistan: An Illuminative
- Arshad, S. J. (2017). Criminal Justice System In Pakistan: A Critical Analysis. [https://courtingthelaw.com/2017/02/15 /commentary/criminal-justice-system-in-pakistan-a-critical-analysis](https://courtingthelaw.com/2017/02/15/commentary/criminal-justice-system-in-pakistan-a-critical-analysis)
- hardwaj, A. (2023). Remedies Available When Police Refused to Register an FIR. *Linkedin.com*. <https://www.linkedin.com/pulse/remedies-available-when-police-refused-register-fir-abhishek-bhardwaj>
- Human Rights Case No. 2013 [2014] SCMR 83.
- Human Rights Case No.3212[2006] SCMR 1547.
- Husan, S. (2022). Role of Forensic Evidence in the Criminal Investigation: A Legal Analysis in Bangladesh Perspective. *Traditional Journal of Law and Social Sciences*, 1(02), 181-192.
- Hussain, A., Akhtar, S., & Hassan, M. (2021). Studying the Causes of Delay in Criminal Trials under the Criminal Justice System of Pakistan. *Global Sociological Review*, VI (II), 52-58.
- Hussain, N., Khan, A., & Chandio, L. A. (2023). Legal Safeguards against Mob Justice: An Analysis of Blasphemy Laws in Pakistan and International Human Rights Norms. *Al-Qamar*, 13-26.
- Iqbal, A. (2023). See discussions, stats, and author profiles for this publication at: [https://www.researchgate.net/publication/323614212 Ovarian Leiomyoma Associated with Serous Cystadenoma-A Case Report of an Uncommon Entity Ovarian Leiomyoma Associated with Serous Cystadenoma-A Case Report of an Uncommon Entity](https://www.researchgate.net/publication/323614212_Ovarian_Leiomyoma_Associated_with_Serous_Cystadenoma-A_Case_Report_of_an_Uncommon_Entity_Ovarian_Leiomyoma_Associated_with_Serous_Cystadenoma-A_Case_Report_of_an_Uncommon_Entity).
- Kanwel, S., & Ayub, N. (2023). FIR Denial by Police: A Legal and Ethical Dilemma. *PAKISTAN ISLAMICUS (An International Journal of Islamic & Social Sciences)*, 3(2), 335-343.
- Khan, N. A., & Lohano, H. (2020). An Analysis of Criminal Justice System of Pakistan: An Overview. *Journal of Humanities and Social Sciences Studies*, 2(1), 31-41.
- Khan, S., Ahmed, A., & Ahmed, K. (2021). Enhancing police integrity by exploring causes of police corruption. *Management Science Letters*, 11(6), 1949-1958.
- Law. *Courting the Law*. <https://courtingthelaw.com/2020/10/20/faqs/what-to-do-if-police-delays-or-refuses-registration-of-fir/>
- Mahmood, S., & Mirza, K. H. (2016). An evaluation of the criminal justice system in Pakistan: Challenges and opportunities. *Journal of South Asian Studies*, 4(2), 181-198
- Malik, N., & Qureshi, T. A. (2021). A study of economic, cultural, and political causes of police corruption in Pakistan. *Policing: A journal of policy and practice*, 15(2), 1446-1462.

- Nazim, S. (2022). Impact of Law School Clinics on Criminal Justice Access in India. *Law Essentials J.*, 3,1.
- Qureshi, G. M., Chaudhary, F., & Ashfaq, M. (2023). If a Former Prime Minister cannot: How can I? A Bird Eye view of Sec. 154 CRPC and Right to Register a FIR (First information Report). *Journal of Policy Research*, 9(1).
- Raza, A., & Khan, A. (2023). Mechanism of Crime Reporting in Pakistan: A Critical Study. *Human Nature Journal of Social Sciences*, 4(2), 66-81.
- Riaz, A., & Khan, S. (2018). Incompetence of judges delays justice: JCP.
- Rustam, T. (2020) "Some Myths about FIR", *The News*, March 29, 2020 available at: <https://www.thenews.com.pk/tns/detail/635430-some-myths-about-firs> accessed July 6, 2021.
- Shabbir, S. S. (2022). Delay Defeats Criminal Justice in Pakistan. Available at SSRN 4097930. Study of Punjab Women Police, Pakistan. *Pakistan Journal of Criminology*, 14(330).
- Study. Lulu. Com
- Tahir, A. (2020, October 19). What To Do If Police Delays or Refuses Registration of FIR - Courting The
- Tovar, M., & Lin, L. S. (2022). The Politics of Sexual Violence and Subhuman Conditions: The Case of Bosnia and Rwanda. *Traditional Journal Of Law And Social Sciences*, 1(02), 17-27.