

Impact of Mandatory Fir Registration on Judicial Supervision and Police Efficiency in Bihar

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Abstract: *The mandatory registration of First Information Reports (FIRs) represents one of the most significant reforms in India's criminal justice system. Following the landmark Supreme Court judgment in Lalita Kumari v. Government of Uttar Pradesh (2014), registration of an FIR became compulsory whenever information discloses the commission of a cognizable offence. The objective of this review paper is to examine the impact of mandatory FIR registration on judicial supervision and police efficiency in Bihar. The paper synthesizes judicial decisions, statutory provisions, empirical literature, and policy reports published between 2010 and 2025.*

It evaluates how mandatory FIR registration has improved transparency, strengthened judicial oversight, enhanced victims' access to justice, and influenced police performance. The review also identifies operational challenges such as increased workload, misuse allegations, infrastructure limitations, and investigation delays. The paper concludes that while mandatory FIR registration has substantially strengthened accountability and the rule of law, improvements in manpower, digital policing, forensic support, and judicial monitoring are necessary to maximize its effectiveness in Bihar..

Keywords: Mandatory FIR, Judicial Supervision, Police Efficiency, Bihar Police, Criminal Justice System, Lalita Kumari, BNSS

I. INTRODUCTION

The First Information Report (FIR) serves as the foundation of criminal investigation in India. It initiates police investigation into cognizable offences and enables judicial scrutiny of police action. Before the Supreme Court's decision in Lalita Kumari v. Government of Uttar Pradesh, police officers frequently exercised discretion in registering FIRs, often leading to delays, refusal, and manipulation of crime statistics. The Constitution Bench held that registration of an FIR is mandatory whenever information reveals a cognizable offence, emphasizing that compulsory registration strengthens access to justice, transparency, and judicial oversight.

In Bihar, mandatory FIR registration has become particularly significant due to historical concerns regarding under-reporting of crime, political influence, and administrative inefficiencies. The implementation of digital systems such as the Crime and Criminal Tracking Network and Systems (CCTNS), Zero FIR, and electronic records has further strengthened police accountability while enabling courts to supervise investigations more effectively.

OBJECTIVES OF THE REVIEW

To examine the legal framework governing mandatory FIR registration.

To review literature on judicial supervision after mandatory FIR registration.

To evaluate its impact on police efficiency in Bihar.

To identify implementation challenges.

To suggest policy recommendations.

METHODOLOGY

Component	Description
Study Type	Narrative Review
Sources	Supreme Court judgments, High Court decisions, peer-reviewed journals, Law Commission reports, NCRB reports, BPR&D publications
Period Reviewed	2010–2025
Focus Area	Bihar Police Administration
Analysis Method	Thematic Review

EVOLUTION OF MANDATORY FIR REGISTRATION

The Supreme Court observed that compulsory FIR registration promotes transparency, minimizes police discretion, prevents manipulation of evidence, and facilitates judicial oversight. The Court also permitted preliminary inquiry only in exceptional categories of cases where the existence of a cognizable offence requires limited verification. Subsequent criminal procedure reforms under the Bharatiya Nagarik Suraksha Sanhita (BNSS), 2023, retained mechanisms for FIR registration while expanding digital reporting through e-FIR and Zero FIR procedures.

Table 1. Legal Milestones

Year	Legal Development	Significance
1973	Section 154 CrPC	FIR registration provision
2014	Lalita Kumari Judgment	Mandatory FIR established
2023	BNSS enacted	Digital FIR mechanisms strengthened
2024	Implementation of BNSS	Expanded e-FIR and Zero FIR procedures

JUDICIAL SUPERVISION AFTER MANDATORY FIR REGISTRATION

Mandatory FIR registration substantially strengthened judicial supervision through:

Increased accountability of police officers.

Reduction in arbitrary refusal to register complaints.

Greater transparency of investigations.

Easier judicial monitoring of investigation progress.

Better protection of victims' constitutional rights.

The Supreme Court specifically noted that compulsory FIR registration is intended not only to facilitate criminal investigation but also to ensure judicial oversight over police functioning.

In Bihar, High Court decisions have repeatedly relied upon Lalita Kumari to direct registration of FIRs where police refused to act.

Table 2. Judicial Impact

Indicator	Before Mandatory FIR	After Mandatory FIR
Police discretion	High	Limited
Judicial monitoring	Weak	Strong
Victim access	Restricted	Improved
Accountability	Moderate	High
Transparency	Low	High

IMPACT ON POLICE EFFICIENCY IN BIHAR

Mandatory FIR registration has produced both positive and operational effects.

Positive Outcomes

Improved crime reporting.

Enhanced public trust.
Better documentation of criminal incidents.
Standardized investigation procedures.
Increased use of digital policing platforms.
Greater integration with CCTNS and ICJS systems.

Operational Challenges

Increase in registered cases.
Higher investigation workload.
Shortage of trained investigating officers.
Delays in filing charge sheets.
Pressure on forensic laboratories.
Administrative burden on police stations.

Table 3. Effect on Police Performance

Dimension	Positive Impact	Challenge
Crime Reporting	Increased	Larger caseload
Investigation	Better documentation	Delays
Accountability	Improved	Administrative pressure
Public Trust	Enhanced	Resource limitations
Digital Governance	Stronger	Training requirements

LITERATURE REVIEW SUMMARY

Author	Findings
Lalita Kumari (2014)	Mandatory FIR strengthens rule of law
Law Commission (2023)	Supports phased expansion of e-FIR
BPR&D (2023)	Zero FIR improves accessibility
Judicial studies	Greater transparency and victim access
Police reform literature	Calls for additional manpower and digital modernization

MAJOR CHALLENGES IN BIHAR

High vacancy rates among police personnel.
Limited forensic infrastructure.
Heavy case pendency.
Uneven technological capacity across districts.
Need for continuous judicial monitoring.
Inadequate training regarding BNSS provisions.

POLICY RECOMMENDATIONS

Increase investigation staff.
Expand forensic laboratories.
Strengthen digital FIR systems.
Conduct periodic judicial audits.
Improve police training.
Increase victim awareness programs.
Strengthen monitoring by Superintendents of Police.
Enhance coordination among police, prosecution, and judiciary.

Expand use of CCTNS and ICJS.
Regular evaluation of FIR disposal efficiency.

II. CONCLUSION

Mandatory FIR registration has fundamentally transformed criminal justice administration in Bihar by limiting arbitrary police discretion and strengthening judicial supervision. The Lalita Kumari judgment established that registration of an FIR is a statutory obligation whenever a cognizable offence is disclosed, thereby improving transparency, protecting victims' rights, and reinforcing the rule of law.

Although Bihar Police has made progress through digital initiatives such as CCTNS, Zero FIR, and e-governance, the resulting increase in registered cases has also intensified pressure on investigative resources. Sustained improvements in manpower, infrastructure, forensic support, judicial oversight, and technological capacity are essential to ensure that mandatory FIR registration leads not only to greater accountability but also to more efficient investigations and timely justice.

REFERENCES

- [1]. Agarwal, S., & Chouksey, Y. (2026). From Lalita Kumari to Section 173(3) BNSS: FIR Registration, Police Discretion, and the Constitution after the BNSS. *Law School Policy Review*.
- [2]. Bureau of Police Research and Development. (2022). *Police Modernization Report*.
- [3]. Bureau of Police Research and Development. (2023). *Standard Operating Procedures on Zero FIR and e-FIR*. Government of India.
- [4]. Government of India. (2023). *Bharatiya Nagarik Suraksha Sanhita, 2023*.
- [5]. Kaur, R. (2018). Police reforms and criminal justice administration in India. *Indian Journal of Public Administration*, 64(3), 320–336.
- [6]. Kumar, A. (2019). Police accountability and judicial supervision in India. *Journal of Criminal Law Studies*, 11(2), 85–102.
- [7]. Lalita Kumari v. Government of Uttar Pradesh, (2014) 2 SCC 1.
- [8]. Law Commission of India. (2023). Report No. 282: Amendment in Section 154 CrPC for Enabling Online Registration of FIR.
- [9]. Malik, V., et al. (2021). ILDC: Indian Legal Documents Corpus for Court Judgment Prediction. *arXiv*.
- [10]. Ministry of Home Affairs. (2024). *Crime and Criminal Tracking Network and Systems (CCTNS): Implementation Status Report*.
- [11]. National Crime Records Bureau. (2023). *Crime in India 2023*. Ministry of Home Affairs.
- [12]. National Judicial Data Grid. (2024). *Judicial Statistics on Criminal Cases*.
- [13]. Patna High Court. (2018). *Ramapati Singh v. State of Bihar*.
- [14]. Patna High Court. (2022). *Shiv Kumar v. State of Bihar*.
- [15]. Prakash, S. (2020). Judicial control over police investigation. *Journal of Indian Law Institute*, 62(1), 45–63.
- [16]. Rao, V. (2017). Criminal procedure and victims' rights in India. *Indian Bar Review*, 44(2), 90–108.
- [17]. Singh, M. (2021). Police modernization in Bihar. *Police Research Journal*, 18(1), 40–57.
- [18]. Supreme Court of India. (2014). *Lalita Kumari v. Government of Uttar Pradesh*.
- [19]. Upadhyay, A. (2026). *Accountable to the Magistrate, Not to You: How the BNSS Reforms FIR Registration*. SSRN.
- [20]. Verma, K., Musaddi, A., Mittal, A., & Jain, A. (2023). Estimating Time to Clear Pendency of Cases in High Courts in India Using Linear Regression. *arXiv*.