

Victim Protection and Witness Anonymity in Criminal Trials: Global Norms and Indian Realities

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Abstract:

Victim and witness protection is vital for ensuring justice is served fairly, especially in criminal cases where their testimonies can determine outcomes. However, protecting these individuals often faces significant hurdles, both in India and worldwide. This paper explores the evolving framework of victim and witness protection in criminal trials, with a particular focus on Indian legal and constitutional developments within a comparative global context. As indispensable participants in the justice process, victims and witnesses often face threats, coercion, and intimidation that endanger both personal safety and the fairness of trials. While international legal instruments such as the International Covenant on Civil and Political Rights (CCPR), United Nations Convention against Transnational Organized Crime (UNTOC), and the Rome Statute underscore the necessity of such protections, India's trajectory has been shaped by constitutional principles under Articles 14, 21, and 39A, landmark judgments, and evolving legislative measures. Despite significant doctrinal affirmation through decisions such as *Zahira Sheikh* and *Mahender Chawla*, the country continues to grapple with inconsistent enforcement, fragmented statutory provisions, and gaps in awareness and infrastructure.

The paper discusses India's experience alongside practices in various international jurisdictions, highlighting various models such as anonymity protocols, relocation schemes, and in-camera proceedings. It also assesses the Witness Protection Scheme, 2018, as a pivotal development, albeit one requiring statutory codification and enhanced implementation. By examining theoretical foundations grounded in social contract theory and international jurisprudence, the paper argues for a more integrated and rights-based approach. Ultimately, it proposes a targeted roadmap to bridge the gap between normative frameworks and operational realities, reinforcing that effective victim and witness protection is essential not only for securing individual justice but for preserving public confidence in the rule of law.

Index Terms: Constitutional law, Criminal justice, Victim rights, Witness protection.

INTRODUCTION

Victims and witnesses constitute the moral and evidentiary backbone of the criminal justice process. Their testimonies are often decisive in determining guilt or exoneration, and their participation is indispensable in ensuring that justice is not only done but seen to be done. However, their cooperation frequently comes at a steep personal cost, exposing them to threats, harassment, and even violence. The absence of adequate protection not only jeopardizes individual safety but also compromises the integrity of the judicial process itself. Globally, this challenge has been met with an evolving matrix of legal protections that seek to secure testimony without compromising fairness. India, while constitutionally and statutorily cognizant of this imperative, continues to grapple with a gap between normative protections and operational reality.

In this paper, the authors shall aim to do a structured analysis of victim and witness protection, placing Indian developments within a global comparative framework. The same shall begin by examining international norms laid down by the United Nations, including the Declaration of Basic Principles of Justice for Victims of Crime [1], and the European Court of Human Rights, which emphasizes balancing procedural fairness with witness safety. Then we shall discuss practices in jurisdictions such as the United States, where federal witness protection programs offer relocation and identity changes; the United Kingdom, with its robust anonymization protocols; Scotland's specialized victim support services; and to also consider the global south, South Africa's emerging frameworks addressing post-apartheid judicial challenges. These comparative insights highlight diverse strategies tailored to jurisdictional needs. The paper then undertakes a doctrinal assessment of the Indian legal framework, analyzing constitutional provisions like Article 21 [2], statutory safeguards under the erstwhile Code of Criminal Procedure (CrPC), 1973, the Witness Protection Scheme, 2018, and key judicial pronouncements such as *Mahender Chawla v. Union of India*. We aim to identify gaps in funding, infrastructure, and awareness that undermine implementation. Finally, towards the end we shall propose reforms, including dedicated funding for protection programs, enhanced training for law enforcement, and public awareness campaigns to foster trust in judicial processes, aiming to bridge the divide between policy and practice.

THEORETICAL FOUNDATIONS OF VICTIM AND WITNESS PROTECTION

Victim and witness protection lies at the heart of a just and credible criminal justice system. Its theoretical justification rests on both legal doctrine and broader political philosophy. At a foundational level, the legitimacy of the state is derived from its ability to secure the rights and well-being of those who rely on its institutions [3]. Social contract theory posits that individuals cede certain freedoms to the state in return for protection, including the assurance of justice through a fair legal process [4]. When victims or witnesses step forward to participate in criminal proceedings, they perform an essential civic duty, which is often discharged at a significant personal risk. In return, the state has an affirmative and reciprocal obligation to ensure that their testimony does not come at the cost of safety, dignity, or life itself.

From a normative standpoint, the absence of protection mechanisms compromises the fairness of trials. Fear of reprisal can silence the very voices that are essential to establishing truth, or at the very least take the judicial proceedings forward. This holds true both for a victim and a witness. For a victim, assuming even if they have the means to retaliate to the culprit, by relying on the state's organs, they are positing their faith in the same. If they do not have the means to take matters in their own hands, then it further highlights the importance of the state providing them a safe haven until justice prevails. The same goes for those acting as witnesses, when they have a critical role to play in matters that affect our society, the least the state can do is afford them protection. If these things aren't taken care of, it leads to circumstances that are not ideal in a country, to say the least. In such circumstances, the right to a fair trial becomes hollow and justice becomes a formal ritual rather than a substantive process. This concern becomes more acute in jurisdictions like ours, which are marked by entrenched social hierarchies, uneven access to power, or systemic criminality. The capacity of the justice system to function credibly is deeply tied to its ability to ensure that participants in the process, especially those aligned with the prosecution, can do so free from coercion or harm. In this way, protection measures serve not merely a procedural function but embody a deeper ethical and democratic commitment to fairness, equality, and public confidence.

The Supreme Court has echoed these concerns. In *State of Gujarat v. Anirudh Singh* [5], the Court observed that the reluctance of witnesses to testify was less a reflection of individual cowardice and more an indictment of systemic failure. It emphasized that without robust safeguards, the entire edifice of a fair trial stands on uncertain ground. This reality was reaffirmed in *Sakshi v. Union of India* [6], where the Court advocated for protective innovations such as video conferencing and the use of screens during the testimony of vulnerable

witnesses, underlining the need for trauma-informed judicial processes, especially in matters dealing with sexual offences against women and children.

International legal standards also reinforce the theoretical imperative for protection. Article 14 of the ICCPR [7], to which India is a signatory, guarantees the right to a fair trial. Although it does not explicitly mandate witness protection, this right has been interpreted to encompass measures that ensure meaningful and fearless participation in legal proceedings. The Rome Statute of the International Criminal Court (ICC) advances this further by creating a dedicated Victims and Witnesses Unit that offers identity protection, relocation, and psychological support, especially in high-stakes prosecutions such as those involving genocide or war crimes [8]. These models reinforce the idea that justice cannot be achieved in a climate of fear, and that participant welfare is essential for prosecutorial legitimacy.

Further, the European legal framework has also embraced this philosophy. The 1995 Council of Europe Resolution [9] and subsequent European Union directives on terrorism and organized crime stress the need for state-led witness protection programs, identity concealment, and international coordination. The European Court of Human Rights, in *Doorson v. The Netherlands* [10], allowed for anonymous testimony when necessary to protect witnesses, so long as this was counterbalanced by procedural safeguards for the accused. This jurisprudence reflects the delicate but necessary balancing act between protecting individuals who assist in prosecution and preserving the rights of the defendant.

The societal benefits of effective witness protection extend beyond trial outcomes. When people believe they can testify without endangering their lives, public cooperation with law enforcement improves, impunity rates drop, and faith in democratic institutions grows. The presence of protection programs deters intimidation and reinforces the principle that the state values truth and fairness. Conversely, when such measures are absent or weak, the result is often a breakdown in prosecutorial effectiveness, a chilling effect on public cooperation, and broader institutional distrust.

Despite these advancements, various challenges continue to persist. Some of these include, resource limitations, fragmented systems across jurisdictions, and the ongoing tension between transparency and confidentiality. Nonetheless, the moral and constitutional imperative remains clear: no legal system can claim to be just if those who speak the truth are left exposed. Ensuring their protection is not just a function of law but in the authors' view, it is a litmus test of the state's commitment to justice itself.

LEGISLATIVE FRAMEWORK WITH RESPECT TO VICTIM PROTECTION IN INDIA

I. Constitutional Foundations and Judicial Interpretation

India's constitutional framework for victim and witness protection is grounded in Articles 14 [11], 21, and 39A [12]. Article 21, which guarantees the right to life and personal liberty, has been expansively interpreted by the Supreme Court to encompass the right to a fair trial, which is an entitlement that is rendered illusory at best if witnesses are subject to threats, harassment, or intimidation. Article 14, which ensures equality before the law, supports the notion that all witnesses, regardless of socio-economic background, must be accorded equal protective measures to ensure meaningful participation in judicial proceedings. Article 39A, while not a right but a directive principle, reinforces this imperative by mandating that the state ensure access to justice through legal aid and equitable opportunities within the justice system.

Judicial interpretation has played a catalytic role in converting these constitutional guarantees into enforceable protections. In *Zahira Habibulla H Sheikh v. State of Gujarat* [13], the Supreme Court responded to glaring instances of witness coercion during the post-Godhra riot trials by affirming that a fair trial is a fundamental component of Article 21. The Court criticized the systemic failure to shield witnesses and held that intimidation and inducement not only frustrate justice but corrode public faith in the legal system. The issue received constitutional reinforcement in *Mahender Chawla v. Union of India* [14], where the Court declared

witness protection to be a constitutional obligation inherent in Article 21. The right to testify freely was explicitly recognized as part of the right to life and liberty. In doing so, the Court also exercised its powers under Articles 141 [15] and 142 [16] to make the Witness Protection Scheme, 2018 [17] binding on all states and union territories until appropriate legislation is enacted.

II. Historical Evolution

The concern for witness protection has been voiced as far back as the 14th Law Commission Report in 1958 [18], which noted the common practice of witness tampering and emphasized the need to protect the credibility of testimony in adversarial trials. This was further developed in subsequent reports, including the 154th (1996) [19], which offered detailed accounts of intimidation and procedural gaps, and the 172nd (2000) [20], which proposed measures to shield witnesses from accused persons during trial. The 178th (2001) [21] and 198th (2006) [22] reports took a broader view, advocating statutory reforms and procedural innovations to ensure anonymity, protection orders, and financial support for witnesses in serious criminal cases.

Legislatively, India has responded with several partial measures. The Indian Penal Code (IPC), 1860 was amended in 2005 to introduce Section 195A [23], which penalized threats and inducements aimed at influencing witness testimony, providing for imprisonment of up to seven years. This has now been retained under Section 232 of the Bharatiya Nyaya Sanhita (BNS), 2023 [24]. The erstwhile Section 228A under the IPC [25], which is now enshrined under Section 72 of the BNS [26] prohibits the disclosure of the identity of victims of sexual offences, aiming to prevent further trauma and social ostracism. The CrPC also provides structural protections through Section 327 [27], which mandates in-camera proceedings for sexual offences and bars publication of victim identities. The same is also enshrined under Section 366(2) of the Bharatiya Nagarik Suraksha Sanhita (BNSS), 2023 [28]. Then there's also Section 357A of the CrPC [29] which presently is Section 396 under the BNSS [30], establishes a victim compensation scheme and requires state coordination for rehabilitation support. Despite these provisions, enforcement remains inconsistent, and their impact is often limited to high-profile cases where judicial intervention plays a decisive role.

III. Scope for Improvement

The theoretical justification for witness protection rests on the premise that the state must provide an environment in which individuals can participate in the justice process without fear. The right to a fair trial becomes hollow if witnesses are silenced by fear or compelled to turn hostile to ensure their own survival. Without structural safeguards, the very foundation of a fair trial is endangered.

International legal standards also buttress this position. As mentioned previously, Article 14 of the ICCPR, to which India is a party, affirms the right to a fair trial and implicitly includes measures to protect those who participate in it. Here, cases such as the one titled *Sakshi v. Union of India*, as also discussed above, mention advanced procedural innovations like the use of video conferencing and visual screens during testimony, reinforcing the principle that justice must be trauma-informed and accessible. Despite the existence of constitutional guarantees, supportive judicial precedent, and some statutory safeguards, India's current system remains fragmented. The absence of a comprehensive statute has meant that protection depends heavily on judicial discretion and administrative responsiveness. As recognized in cases like *Neelam Katara v. Union of India* [31], there is an urgent need for uniform and enforceable witness protection laws that transcend ad hoc measures and reflect a consistent state policy.

WITNESS PROTECTION SCHEME, 2018

The Witness Protection Scheme, 2018, was approved by the Supreme Court in *Mahender Chawla*, with directions under Articles 141 and 142 making it binding until legislation is enacted. Drafted by the Ministry of Home Affairs in consultation with the National Legal Services Authority and state governments, the scheme is India's first structured attempt to institutionalize witness protection.

It classifies threats into Categories A (threat to life), B (threat to safety or property), and C (harassment), and provides for corresponding protection measures including non-disclosure of identity, relocation, use of

pseudonyms, voice modulation, and video-linked depositions. Applications are processed by a District Standing Committee chaired by the District and Sessions Judge, assisted by police-led Threat Analysis Reports. The scheme also provides for Witness Protection Funds, jointly financed by state budgets and private contributions.

Importantly, the scheme mandates that protection be granted within five days of application and allows in-camera trials and restricted court access to prevent retaliation. The Supreme Court had further directed the establishment of Vulnerable Witness Deposition Complexes across all districts by the end of 2019, a direction that has only partially been implemented as of today.

INTERNATIONAL LEGAL FRAMEWORK: GLOBAL NORMS AND COMPARATIVE INSIGHTS

The need to shield victims and witnesses from harm has gained sustained recognition in international criminal law. The UNTOC, adopted in 2000, provides one of the clearest mandates under Article 24 [32], requiring signatory states to protect witnesses from retaliation, including through measures such as relocation and non-disclosure of identity. The Protocols under UNTOC, particularly those on trafficking and migrant smuggling, further reinforce this obligation by emphasizing procedural protections and social support structures.

The United Nations Convention against Corruption (UNCC) of 2003 similarly advocates for witness protection, calling for the adoption of agreements for cross-border relocation and confidentiality under Articles 32 [33] and 37(4) [34]. These obligations are further bolstered by soft-law instruments like the Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power, 1985 [35] and the Bangkok Declaration, 2005 [36], which urge member states to create legal frameworks that prioritize both safety and participation.

The European Court of Human Rights (ECtHR) has played a pivotal role in reconciling anonymity with due process. In *Kostovski v. The Netherlands* [37], the Court emphasized that while anonymous testimony may be necessary in cases of intimidation, it cannot be the sole basis for conviction without corroboration. *Doorson v. The Netherlands*, as discussed, went further to allow anonymous testimony with counterbalancing mechanisms such as indirect cross-examination. Other cases like over the years have further refined the doctrine, establishing that the reliability of anonymous witnesses must be judicially verified and that the defense must always be afforded a meaningful opportunity to contest the evidence.

These principles have shaped domestic practices. In the United Kingdom, witness anonymity is governed by the Coroners and Justice Act, 2009, and accompanied by procedures for screen usage, voice modulation, and testimony through video links. In the United States, the WITSEC program under the Department of Justice offers comprehensive identity protection and relocation for high-risk witnesses, particularly in cases involving organized crime. Scotland provides for anonymous testimony under the Criminal Justice and Licensing (Scotland) Act, 2010, and supports vulnerable witnesses through the 2004 Act. In South Africa, Section 153 of the Criminal Procedure Act [38] allows in-camera proceedings in cases involving sexual offences or intimidation.

These models demonstrate a fine balancing of witness safety and procedural fairness, offering valuable lessons for India's evolving framework.

EMPIRICAL AND DOCTRINAL EVALUATION

Despite a strong doctrinal foundation, implementation remains patchy. Victims and witnesses are often unaware of their entitlements. The Witness Protection Scheme, though binding, lacks statutory force, and suffers from bureaucratic bottlenecks. Police Threat Analysis Reports are often delayed or perfunctory, while underfunded Protection Cells are ill-equipped to enforce safety protocols. Vulnerable witness complexes are absent in many states, and financial allocations to the Protection Fund remain inconsistent.

Social and cultural barriers further complicate the situation. In rural areas, fear of ostracization and community pressure discourages witnesses from seeking protection. The slow pace of judicial proceedings often means

that witnesses remain exposed for extended periods. Simultaneously, balancing protection with the accused's right to cross-examine remains a legally delicate task, demanding nuanced judicial calibration.

JUDICIAL DEVELOPMENTS: AFFIRMING AND EXTENDING PROTECTIONS

A series of landmark judgments have shaped India's evolving jurisprudence on this issue. In *Mahender Chawla*, as mentioned, the Court formally adopted the Witness Protection Scheme. In *Zahira Sheikh v. State of Gujarat*, arising from the Best Bakery case, the Court condemned the intimidation of witnesses and ordered a retrial, reinforcing the state's duty to shield vulnerable participants.

In *State of Punjab v. Gurmit Singh* [39], the Court mandated anonymity for rape victims in judicial orders, which later found statutory recognition under Section 228A IPC. *Sakshi v. Union of India* and *Delhi Domestic Working Women's Forum v. Union of India* [40] both advanced procedural innovations—such as screens, in-camera trials, and recorded depositions—to reduce secondary trauma to victims during cross-examination. These judgments consistently emphasize the judiciary's role in balancing the rights of the accused with the dignitary and security interests of victims and witnesses, an evolving doctrine particularly relevant in the face of legislative inertia.

CONCLUDING REMARKS

Victim and witness protection in India occupies a crucial space between constitutional promise and administrative fragility. While the judiciary has affirmed its status as a facet of Article 21, and the Witness Protection Scheme, 2018, marks a step toward institutional clarity, enforcement remains uneven and fragmented. To operationalize this framework and ensure meaningful protection, the following measures are essential:

- Enact a dedicated Witness Protection Act, codifying the 2018 Scheme and aligning it with judicial precedent.
- Ensure time-bound implementation supported by adequate budgetary allocations and infrastructure, including the completion of Vulnerable Witness Deposition Complexes nationwide.
- Develop and institutionalize training modules for police, prosecutors, and judges to apply trauma-informed, rights-based protection protocols.
- Lastly, launch targeted public awareness initiatives to inform victims and witnesses of their rights and the mechanisms available for their protection.

Witness protection is not an auxiliary feature of the justice system—it is central to the delivery of fair trials, public trust, and the rule of law. India's progress will depend not just on doctrinal affirmation but on practical safeguards that inspire confidence and eliminate fear. Bridging the normative-implementation gap is imperative to uphold the constitutional vision of justice.

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