Draft Punjab Police Act 2010
Analysis and Recommendations

March 2010

Centre for Peace and Development Initiatives (CPDI) is an independent, non-partisan and a not-for-profit civil society organization working on issues of peace and development in Pakistan. It is registered under Section 42 of the Companies Ordinance, 1984 (XLVII of 1984). It was established in September 2003 by a group of concerned citizen who realized that there was a need to approach the issue of peace and development in an integrated manner. The CPDI is a first initiative of its kind in Pakistan. It seeks to inform and influence public policies and civil society initiatives through research-based advocacy and capacity building in order to promote citizenship, build peace and achieve inclusive and sustainable development. Areas of special sectoral focus include promotion of peace and tolerance, rule of law, transparency and access to information, budget watch and Legislative Watch and Development.
Draft

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A Publication of Centre for Peace and Development Initiatives (CPDI)
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1. Introduction:

Over the last decade, the government of Pakistan has taken significant steps to reform the legal framework pertaining to the functioning of the police services. Most important of all was the promulgation of the Police Order 2002, which aimed to provide for a police that would "function according to the Constitution, law, and democratic aspirations of the people...". In order to achieve these objectives, the Police Order 2002 defined the responsibilities and duties of the police in such a manner which, if implemented in letter and spirit, would make it a public service as opposed to a force and an instrument of state oppression. The Police Order 2002 provided for mechanisms of public oversight, operational autonomy for the police department, functional specialization and public accountability. However, this Order had been promulgated by a military dictator, who lacked legitimacy and whose measures were rejected by the political leadership across the board. Hence, the changes made by his regime in the legal framework had a very narrow ownership base.

Before the Ordinance could be fully implemented, it was massively amended in late 2004 and the mechanisms of public oversight and accountability were weakened. Even the massive amended Police Order 2002 has never been fully implemented, although several years have now passed since the promulgation of original Order as well as the amendments. In particular, the government and the police authorities have been reluctant or very slow in implementing the provisions relating to public oversight and accountability. For instance, the public safety and police complaints commissions were either not constituted or not facilitated and enabled to perform their responsibilities. In many districts, police officers did not extend cooperation to these commissions; while there also existed problems in relation to the capacity or integrity of members of the commissions.

Now the provincial governments are again planning to substitute the Police Order 2002 with their own provincial legislation. The Punjab Police has already drafted an Act, which has been circulated in the government for comments and feedback. Centre for Peace and Development Initiatives (CPDI) has made a modest effort to analyze this draft act (CPDI) has made a modest effort to analyze this draft act and its views in order to improve it in the larger public interest. Such civil society input and engagement is extremely important to ensure that the final Act reflects the views and aspirations of all stakeholders and, in particular, addresses the concerns of common people.

The analysis and recommendations presented in this paper are based on certain expectations, which civil society organizations have been articulating time and again in relation to the police service. These expectations are as follows:

- Police service should be run and managed in a completely transparent manner. The laws governing the police must ensure that police disclose maximum information proactively, besides providing for an effective mechanism for peoples' access to information regarding the functioning and operations of the police.

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In keeping with the above outlined civil society expectations, the Table below provides comments and suggestions vis-a-vis various provisions of the Draft Punjab Police Act 2010. These suggestions are by no means exhaustive and may be improved upon in the light of further consultations and discussions. However, it is expected that these comments will inform the debate and ensure that civil society perspectives are also taken on board.

<table>
<thead>
<tr>
<th>No</th>
<th>Draft Punjab Police Act 2010</th>
<th>Comments/ Recommendations</th>
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<tbody>
<tr>
<td>A</td>
<td>Draft Act does not include any provision about peoples’ right to information in relation to police matters.</td>
<td>In its preamble, the Draft Act envisions a police service which is “professional, service-oriented, and accountable to the people”. These are laudable goals. However, the question is: How can a police service be accountable to people when it does not recognize peoples’ right to information in an effective and comprehensive manner? Without having access to correct and timely information or records, there is no way that people could play their role in holding the police accountable. It is now widely recognized that right to information is a pre-requisite for transparent, democratic and accountable governance. The UN declared in 1946 that: ‘Freedom of information is a fundamental human right and a cornerstone for all freedoms.’ Right to information is an effective anti-corruption tool and serves as ‘oxygen’ for democracy. It is, therefore, recommended that the Police Act should include strong provisions about peoples’ right to information. All information and records should be declared as accessible unless excluded on clearly defined and specific grounds like privacy of individuals or potential negative affect for law and order or ongoing investigation. The criteria should be based on whether the public interest would be better served by disclosure or treating a certain record as confidential. The existing framework of granting access to all information or records as clarified or restricted unless declared otherwise must be changed for transparency and democratic accountability.</td>
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2. Draft Act includes no provision about proactive disclosure of any information or records held by the police department. Nor does it provide any other mechanism whereby it could ensure transparency in the matters related to police at any level. In order to ensure transparency and promote democratic accountability, the Police Act must declare that the following type of information/records will be proactively disclosed through notice-boards, websites and published materials:
   - Information about how police can be contacted for reporting crimes, filing complaints, seeking information or copies of record and making suggestions;
   - Particulars of its organization, functions and duties, as well as powers and duties of its officers and employees;
   - Procedures followed in the decision making process, including channels of representation and accountability;
   - Norms, standards and codes set by it for the discharge of its functions;
   - Codes of conduct, rules, regulations, instructions, manuals and records, held by it or under its control or used by its employees for discharging its functions;
   - Statement of the categories of documents that are held by it or under its control;
   - Directory of its citizens and employees;
   - Monthly remuneration received by each of its officers and employees, including the system of compensation as provided in the regulations;
   - Budget allocated to each of its agency (or each district/division), indicating the particulars of all plans, proposed expenditures and reports on disbursements made;
   - Particulars of recipients of concessions, perks, benefits or facilities;
   - Names, designations and other particulars of officers, who could be contacted by people to access information/records;
   - Any other information whose proactive disclosure may be in the interest of transparency or facilitating people. |

B | Recruitment | The recruitment in the Punjab Police other than ministerial staff and |
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<td>3</td>
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<td>First of all, this would mean that the Punjab Police would remain dependent on officers belonging to Federal services to fill senior positions. It is because the people recruited in</td>
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4. "The Provincial Police Officer may, with the approval of the Government, appoint one or more experts to assist the Punjab Police," [s. 30(2)].

5. "The qualifications, eligibility, terms and conditions of service of experts shall be as prescribed," [s. 30(2)].

C. Operational Autonomy/ Internal Governance

5. "The Government shall post a police officer of the rank of Inspector General in the current circumstances, the Provincial Government will not be able to do it on its own without the consent of the Federal Government. It becomes the Provincial

6. "During temporary absence of the Provincial Police Officer, the Government may empower an Additional Inspector General of Police to exercise all or any of the powers, perform all or any of the functions and duties, and discharge all or any of the responsibilities of the Provincial Police Officer," [s. 1(2)].

The Act must not leave any lacuna, whereby an acting PPO could be appointed or retained for extended durations. It is because an acting PPO being uncertain about the tenure of his/her posting would not be able to work effectively and with a long-term perspective. A person serving on temporary basis may also be more susceptible to pressures by vested interests.

7. The Draft Act provides for a minimum 3 years term for police officers serving as PPO and DCPOs as well as for officers in charge of a police division, sub-division or police station.

These are welcome provisions, as security of tenure is essential for the relevant police officers to come up with their own policing plans and then have adequate time to implement such plans to show performance and deliver results. This security of tenure should help in reducing incidence of erratic, arbitrary and politically-motivated transfers/postings.

Simultaneously, the Police Act must provide for an objective mechanism whereby...
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7

8

maturely transferred in ‘exceptional circumstances due to exigency of service’ or in view of ‘misconduct’ or ‘insufficiency that warrants major penalty’. [see s. 12, s. 15, s. 19] performance of police officers could be assessed at the end of each year, and then at the end of 3 years tenure. Such assessment must take into account factors like reduction in crime, detection rate, etc. There should also be a system of having feedback from junior staff as well as people about the reputation and performance of the officer. All future postings and promotions of relevant police officers must be linked with performance shown by an officer in a previous tenure at a certain level.

8

The Act does not provide for the security of tenure of Additional Inspector Generals, Deputy Inspector Generals and heads of Police Training Institutions. [s. 14] All officers with a command/supervisory responsibility for a region or institution or a branch should have the security of tenure.

9

“The Provincial Police Officer, with the approval of the Government, may post an officer not less than the rank of a Senior Superintendent of Police as the head of district police who may be called District Police Officer. [s. 15] The Provincial Police Officer should be authorized to appoint a District Police Officer and no approval or concurrence of the provincial government should be required. This is important to allow operational autonomy and de-politicize the police department. It would also help in promoting accountability as, once having been given operational autonomy, the police officers will not be able to shift responsibility towards others. However, along with operational autonomy, strong and effective provisions should be made for holding the police officers accountable for bad performance or lack of progress.

10

“Provincial Police Officers shall post Superintendents, Superintendents, Assistants and Deputy Superintendents of Police.” [s. 16(2)] Powers and responsibilities must be devolved and institutionalized within the police department as well. Why should the Provincial Police Officer be posting Sub-Inspectors, Assistants and Deputy Superintendents of Police? Why these powers cannot be transferred to a committee headed by the Regional Police Officer (or transfers within the region) and to a committee headed by an Additional Inspector General (for transfers across regions)?

11

The Provincial Police Officer has been empowered to post officers as Commandant of the Police Training College and Principals of each Police Interestingly, in the Draft Police Act, no approval of Provincial Government is required for such postings in the training institutions, which is consistent with the concept of operational autonomy. However, as stated elsewhere, that approval from the Provincial Government is required for the posting of District Police Officers.

Training School. [s. 17] No security of tenure has also been provided for heads of training institutions. Why? Such security of tenure is extremely important for heads of training institutions to ensure that they can focus on improving the quality of instructions.

However, there should be incentives for officers to work in the training institutions as, in the current situation, such postings are not considered attractive and hence, police officers would not like to serve in these institutions for long. Perhaps, this is the reason that the drafters have not considered it important to provide for a security of tenure for them.

But, until and unless, the training institutions get the priority attention of police leadership, the performance of the police in general is not likely to improve. The Draft Police Act does not address this issue at all.

Separation of Investigation from Other Functions

12

“All registered cases shall be investigated by the investigation staff in a police station under the supervision of the Officer in Charge of the police station. The investigation staff shall not be employed for duties other than investigation except with the approval of the head of district police.” [s. 22(3)] This provision does not make much sense. It will adversely affect the investigation process, which has an investigation process susceptible to influence of Officers in Charge. This provision indicates that the realization for developing specialization in the police is still not there.

13

Under the Draft Police Act, an investigation can be changed 3 time i.e. firstly on the order of the head of the district police, secondly on the Change of investigation should be allowed only when there is evidence to suggest that the investigation officer is biased and incompetent or that he/ she has committed misconduct. With each change of investigation, an inquiry must be ordered against the concerned officer to ensure that he or she is punished for any bias, incompetence or misconduct.
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order of the regional police officer and thirdly on the order of the Provincial Police Officer. (See ss 22(4), 5 and 6)

Police has limited resources, which should be used rationally and judiciously. Frequent changes in investigation would put a burden on police resources/taxpayers. Therefore, at the most, only one change of investigation may be allowed and, that too, in special circumstances; while reasons/justification should be recorded in line with a clearly laid out criterion.

**Code of Conduct**

14 Under the Draft Act, the Provincial Police Officer “shall issue code of conduct to regulate police practices, particularly:-

   a) the exercise by police officers of statutory powers of stop and search;
   b) the searching of premises by police officers and the seizure of property found by police officers on persons or premises;
   c) the detention, treatment and questioning of persons by police officers; and
   d) the identification of persons by police officers.

(2) Subject to rules, a police officer contravening the Code of Conduct may be awarded one or more penalties provided under law and rules.” (s. 34)

Similar proviso existed in the Police Order 2002 but the Police Department did not take it seriously. Although code of conduct was notified but it was done in a non-serious manner and without any consultation with stakeholders. Apparently, it was notified just with the aim of meeting a statutory requirement and not really to initiate its implementation for general public benefit. In view of that experience, it is suggested that the Police Act should include provisions about the following:

- Code of conduct shall be prepared and finalized in consultation with stakeholders, especially the council and other relevant civil society organizations;
- Final draft of the code of conduct will be presented in the Provincial Police Council, and will be notified after its approval;
- Once notified, the code of conduct will be widely publicized for public information through notice-boards, websites, and newspaper advertisements;
- Code of conduct will be published in the form of a pocketized booklet, and it will be made mandatory for all police officers to keep it in their pockets during duty hours. It will convey a strong message that the police leadership really takes it seriously.

**Public Oversight**

15 The District Police Council shall have seven members including a woman and a man from each of the following categories:

- A representative of the police force;
- A representative of the local government;
- A representative of the trade union;
- A representative of the community;
- A representative of the judiciary;
- A representative of the media;
- A representative of the civil society.

With a vast majority of the Council members being police, there is a risk that it would become highly politicized and may become a forum to
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15.3.1 The Chief Minister shall appoint the Chairperson from among the voting members of the Council. In case the office of the Chairperson becomes vacant, another Chairperson shall be appointed within thirty days. [a. 77(1)]

15.3.2 The Chairperson shall be appointed for one year through consensus or a majority vote. The CM will not have time to be able to decide about the Chairperson in an informed and fair manner for all the districts in the province. Any role given to the Chairperson would create unnecessary delays in notifying the Chairpersons, besides creating a negative trend of political manoeuvres aimed at influencing the CM along party lines.

15.3.3 The Draft Act provides that chairman can be

These are vague and subjective provisions and would be hard to prove. In fact, there may be a risk that these are abused to curb different views and dissent based on bona fide and justifiable reasons.

This section shows that there will be a highly restricted oversight role for the district police council. Furthermore, these provisions are vague and need to be clarified. In view of this, it is suggested that the Council should also be given role, responsibility and powers to:

- Seek and receive data and information about the overall crime rate and the measures that are being taken to deal with the situation;
- Require the police to develop an annual policing plan and then approve it after providing its input. The policing plan may clearly spell out the challenges, priorities and targets for the year. The Council should also have the responsibility to review the progress regarding policing plan at the end of the year;
- Ask the police leadership in the district to take measures vis-a-vis certain types of complaints of general nature (e.g. non-registration of FIRs), and then seek reports about the actions taken;
- Seek and receive detailed information about the annual budget and its utilization; and make recommendations for more efficient utilization of resources available;
- Review the state of people’s right to information vis-a-vis police
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15.5 “On grounds contained in section 77 above the Chief Minister may terminate the council’s membership of any of his nominees.” [s. 81]

CM should not have any such role, neither in terms of nominating members nor in terms of their removal, as suggested above.

15.6 “The head of district police shall provide shall secretarial support to the Council from the resources at its disposal.” [s. 85]

Council should have its independent secretariat, as dependence on DPO would undermine its autonomy. However, DPO may be asked to depute an officer of SP rank for attending all the meetings, maintaining a regular liaison with the Council and furnishing all the information and reports required by the Council. It may be appropriate to have DPO as an ex-officio (non-voting) member of the Council, as opposed to being its secretary.

Instead of CM, it is the Home Minister who should be made chairperson of the Provincial Council. [In the Punjab, the CM usually holds the portfolio of Home Minister himself/herself but it might change in future]

The number of independent members should be increased to more than 50 percent of the total strength of the Council in order to ensure expertise and representation. The selection of independent members should be based on a clearly laid-out criterion and it must ensure that it would not be influenced by political or vested interests.

16

Provincial Police Council

16.1 “The Provincial Police Council shall have eleven members, including:

a. Chief Minister as Chairperson;

b. Law Minister;
c. Two members of the Provincial Assembly nominated by the Chief Minister at least one of whom shall be from the opposition;
d. Three independent persons of proven reputation for integrity and competence from the fields of academia, law, public administration, media, human rights or other relevant fields to be appointed by the Chief Minister;

e. Chief Secretary of the Punjab;
f. Secretary to the Government of the Punjab, Prosecution Department;
g. Secretary to the Government of the Punjab, Home Department; and

h. Provincial Police Officer as the Council’s secretary.

1. Any vacancy in the Council shall be filled up as soon as practicable, but not later than one month of occurrence of the vacancy.

2. Each member shall have a right to cast a vote in the matters of the Council except those mentioned at (e) to (h) in sub-section (f) above.

Gender Representation: There shall be at least two
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women among the members nominated by the Chief
Minister. [s. 85] In the absence of the Chairperson the Law Minister
shall preside over a meeting. [s. 87]

16.2. The Council may
a. Frame policy guidelines for promoting
efficient, effective, responsive and accountable
policing, in accordance with the law;
b. Identity performance indicators to evaluate the
functioning of the Punjab Police. Such indicators shall,
inter alia, include: operational efficiency, public
satisfaction, victim satisfaction, police investigation and response, accountability, optimisation of
resources, and observance of human rights standards;
c. Direct Provincial Police Officer to evaluate
performance of the Punjab Police using performance indicators identified by the Council and submit
to the Council by the end of August this evaluation in an annual report for each completed
financial year;
d. Review performance of the police in the Punjab
as a whole as well as district wise in the light of the
annual report from the Provincial Police Officer keeping in view the resources available with and
constraints of the police.

Like the District Police Council, the Provincial Police Council also has been
given a limited role and responsibility. However, it will be a powerful forum in its composition and the fact that it will be chaired by the
CM, as per the current Draft. Yet it is important to explicitly expand its mandate, which would ensure that independent members also have their say
in relation to broad spectrum of police related matters.

For example, the Council may be given the responsibility and powers to:
- Require the police to develop an annual policing plan and then
approve it after providing its input. The policing plan may clearly
spell out the challenges, priorities and targets for the year. The
Council should also have the responsibility to review the progress
regarding policing plan at the end of the year;
- Review the procedures and practices related to transfers and
promotions, and then to make recommendations to make the entire
process fair, merit-based, transparent and de-politicised;
- Seek and receive detailed information about the annual budget and
its utilization; and make recommendations for more efficient utilization of
resources available;
- Review the state of people’s right to information via-vis police
department records; and make recommendations for removing any
barriers, constraints or inefficiencies that the people may be facing;
- Make recommendations for making the police department more
transparent and efficient in its functioning, as well as for reducing
incidence of corruption;
- Take steps for public awareness in respect of their right via-vis the
police departments; and who the people could approach in the case of
having complaints;
- Review the police performance via-vis implementation of code of
conduct; and suggest ways for improvement;
- Assess the legitimate needs of police, especially with a focus on
improving traffic and traffic facilities in the police stations meant
for visiters, mobility, investigation and junior police staff;
and
- Prepare an annual report, which may be laid in the Provincial
Assembly.

16.3. ‘Removal of Members’
1. On grounds contained in section 77 above the
Chief Minister may terminate the Council’s
membership of any of the MPAs;
2. An independent member may be removed by a
majority vote of the total voting membership of the
Council on grounds contained in section 77 above.

Such a power in relation to MPAs should rest with the voting members of the Council and it may be exercised through a majority vote.

Accountability

G

The Draft Act does not provide any independent and
effective mechanism for dealing with individual or
collective complaints in relation to police. Although
Chapter VIII of the Draft is titled as ‘Police
Accountability and Ombuds’; the actual provisions
in the Chapter only provide for a weak mechanism

It is suggested that the Police Act should provide for establishing Police
Complaint Commissions at the district levels. Such commissions should
be staffed with professionals / experts, who could investigate complaints
of serious nature related to police and impose appropriate penalties that may
include, among others, fines, award of compensation or damages to victims
and dismissal from service. The decisions of such commissions may only be
for oversight, and not of accountability.

Challenged in higher courts.

Such commissions or authorities are absolutely necessary in view of the fact that regular court systems are overburdened and, in many situations, the internal accountability mechanisms of the police department do not deliver. Such commissions or authorities should be established at the divisional level in order to ensure that people have relatively easy access. These bodies should have a simple procedure to facilitate people, and should follow a proactive approach in terms of seeking records, collecting evidence and engaging police authorities to address public grievances.

H

Powers to Issue Orders and for Maintenance of Public Order and Security

18 The Draft Police Act provides a large number of powers to police officers aimed at regulating public assemblies and processions. (Chapter V and VI)

While such powers are generally required, it may be kept in mind that these powers can also be misused by police officers or staff. It is, therefore, important to define such powers as specifically as possible, and then to build safeguards against the abuse and selective or arbitrary use of such powers.

The Draft Act must recognize that right to association or assembly is a fundamental human, democratic and constitutional right, and it must be strictly restricted only in extra-ordinary circumstances. The Act must state that the police will make its utmost efforts to protect this right of the people but may resort to imposing restrictions in the larger public good — but it will be done based on justifiable reasons which will be recorded and explained to the people.

19 The draft Act provides for additional police to keep peace and order at the cost of organizers of events, functions or large works. (Chapter VI)

Such provisions must be deleted. Police agency should provide security as a public service to all without seeking any payment. It should not be reduced to the status of a private security agency, whose services can be hired.

However, police being the main and primary security provider may, in certain circumstances, direct organizers of certain functions of private or business nature to make adequate security arrangements on their own. The police can have the powers to oversee such security arrangements and advise or instruct appropriate improvements.

T

Gender Aspect

20 The draft Police Act does not include any significant provisions aimed at promoting gender equity in various aspects of policing.

Given that women are more than 50 percent of our population and often face violence and discrimination, the Police Act must make strong and explicit provisions aimed at promoting gender sensitive policies in all aspects and at all levels. In particular, the Police Act must provide for the following:

- Its language should be gender sensitive;
- The Act must set a clear vision and provisions for recruitment of women officers and staff in various branches of the police service. It is too important to be left to subordinate legislation;
- There must be provisions for additional incentives to encourage women to join the police service;
- The Act must provide for a forum comprising senior police officers and representatives of civil society with a mandate to promote gender sensitive work environment in the police service, as well as to set standards for dealing with female detainees;
- Any other measures relating to special needs of women in the society.
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<tr>
<td>21</td>
<td>“No Police Officer to be liable to any penalty or payment of damages on account of act done in good faith in pursuance of duty. No police officer shall be liable to any penalty or to payment of damages on account of an act done in good faith in pursuance of duty. No police officer shall be liable to any penalty or payment of damages on account of an act done in good faith in pursuance of duty imposed or any authority conferred on him by any provision of this Act or any other law for the time being in force or any rule, order or direction made or given therein.” [s. 104] While such a provision may be necessary, the Draft Act must also take into account the damages or injuries, which may have been caused to members of the public as a consequence of “an act done in good faith in pursuance of duty” or “intended pursuance of any duty imposed or any authority conferred on him by any provision of this Act or any other law for the time being in force or any rule, order or direction made or given therein.” The police department cannot completely absolve itself from the responsibility of such consequences in any civilized society. Therefore, in such situations, the police department, as opposed to its officers or staff, should be made responsible to pay compensation and damages to the member of the public. In cases where the department cannot prove that it has made utmost efforts to prevent potential harm or damage to member of public, the award of compensations/damages should be of punitive nature, so as to ensure that incidents of harm is reduced to the minimal.</td>
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<td>22</td>
<td>“Quits or prosecutions in respect of acts done under color of duty not to be entertained if not instituted within the prescribed period- In case of an alleged offence by a police officer, or a wrong alleged to have been done by him or by any act done under color of duty or in exercise of any such duty or authority of this Act or when it shall appear to the Court that offence or wrong if committed or done was of the character aforesaid, the prosecution or suit shall not be entertained, or shall be dismissed, if instituted after more than six months from the date of the action complained of.” [s. 105] Why this limitation of 6 months? There may be situations where a weak party could not have the opportunity or courage to file a complaint within this period due to a variety of reasons. In any case, whenever a bonafide complaint is made, it should be investigated in the interest of justice, particularly when it involves weaker sections of society.</td>
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<tr>
<td>23</td>
<td>“Notice of Suit to be given with sufficient description” Why a notice of two months in this age of prompt communication? Why not of wrong complained of:- 1. In the case of an intended suit on account of an alleged wrong referred to in section 106 by police officer, the person intending to sue shall give two month’s notice as prescribed in section 80 of the Civil Procedure Code, 1908 of the intended suit with sufficient description of the wrong complained of. 2. The provisions of section 80 of the Civil Procedure Code, 1908, shall mutatis mutandis apply to the notice referred to in clauses (1) &amp; (2).</td>
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<td>24</td>
<td>The draft Police Act provides for a punishment of imprisonment term of up to 1 year and/or Rs 50,000 fine against those who may file frivolous or vexatious complaints against a police officer. [s. 73 and s. 74] This provision must be deleted, as it will deter people from filing even the genuine complaints. It will also lead itself to excessive abuse by police officers against people, as complaints that cannot be proved may be dubbed as ‘frivolous’ or ‘vexatious’. Furthermore, the police department must recognize that frivolous and vexatious complaints are more likely to be filed in situations where the department does not have a strong and robust complaint management system. If the people know that the complaint management system is strong and credible, there would be less likelihood of anybody opting for ‘frivolous’ or ‘vexatious’ complaints.</td>
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<td>25</td>
<td>Since the form of the new local government system is not clear yet, this draft Police Act fails short of providing necessary links with the local government system. There is a need to carefully analyze the need and importance of linkages between the draft Police Act and the new local government system currently being discussed.</td>
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