



Police personnel shortage in India: State compliance, constitutional duty, and implications for criminal justice

Vudatha Ravi Rohith

Department of Law, CMRU SOLS, Bengaluru, Karnataka, India

Abstract

Policing in India continues to face a persistent and structural deficit in personnel across multiple States and Union Territories. As of March 2023, India's police-to-population ratio stood at approximately 153 police personnel per 1,00,000 population, which is substantially below the sanctioned level of around 196 per 1,00,000. The ratio also remains below the UN-recommended benchmark of 222 police personnel per 1,00,000 population. This shortfall is not merely administrative. It has direct consequences for law and order maintenance, crime prevention, investigation quality, pendency, and public trust in law enforcement.

This paper examines the gap between sanctioned and actual police strength through a state-wise analysis of vacancy patterns and police-population ratios. The study relies on official secondary data from the Bureau of Police Research and Development (BPR&D), the National Crime Records Bureau (NCRB), and parliamentary materials. It identifies major inter-state disparities and highlights how chronic vacancies affect the functioning of the criminal justice system.

The paper further argues that manpower adequacy is not only a policy question but also a constitutional governance issue. Where the State consistently fails to maintain minimum institutional capacity for policing, the failure may impair the State's positive obligations under Article 21 of the Constitution of India, particularly the duty to protect life and personal liberty through effective law enforcement and fair criminal justice administration.

Finally, the paper proposes reforms focused on time-bound recruitment, rational deployment, strengthening training and forensic support, and transparency in manpower reporting. The paper concludes that addressing police personnel shortages is essential for effective policing, constitutional compliance, and rights consistent governance.

Keywords: Police accountability and oversight, law enforcement capacity, public safety governance, police reform in india, state capacity and policing

Introduction

One of the main ways the State carries out its responsibilities to uphold public order, deter crime, look into offenses, and ensure legal compliance is through the police institution. Despite being included in the State List under the Seventh Schedule of the Indian Constitution, "police" and "public order" are inextricably linked to constitutional governance. The State's obligation to safeguard life and liberty is operationalized through police response, investigation, and preventive action in addition to legislation and the legal system.

India still has a structural shortage of police officers despite the importance of policing. As of March 2023, India's actual police-to-population ratio is approximately 153 police personnel per 1,00,000 population. This is still less than the UN-recommended standard of 222 police officers per one million people, as well as the authorized strength ratio of roughly 196 per one million. The gap between sanctioned and actual strength indicates that a large number of authorised posts remain vacant.

The police manpower shortage is examined in this essay as a quantifiable governance issue with constitutional ramifications. The police's capacity to deter crime, react quickly, carry out thorough investigations, and maintain lawful policing is all impacted by the shortage. Additionally, it erodes public confidence and makes police reforms harder to implement. Therefore, rather than treating manpower adequacy as a purely administrative statistic, the study views it as a legal and institutional issue.

Conceptual Framework: What is "Adequate" Police Strength?

1. Police–Population Ratio

One often used metric to evaluate the sufficiency of manpower is the police to population ratio. It allows for state by state comparison and expresses the number of police officers per one million people. Because it represents the State's fundamental ability to provide patrol coverage, response services, and investigative manpower, it is still a useful baseline even though it cannot accurately represent the quality of policing.

But care must be taken when interpreting the ratio. Internal deployment patterns, training, infrastructure, technology, forensic support, and the allocation of traffic, specialized units, armed police, and civil police. Nonetheless, a structural capacity gap is indicated when the ratio is much lower than recognized benchmarks.

2. Sanctioned vs Actual Strength

Two related metrics are used to evaluate manpower adequacy in India: sanctioned strength and actual strength. The number of positions officially authorized by the relevant authority is referred to as sanctioned strength. The number of employees who are genuinely serving and ready for deployment is referred to as actual strength.

Vacancies are reflected in the discrepancy between authorized and actual strength. Because sanctioned strength already reflects the State's own estimation of minimum staffing needs, vacancies are significant. Long-term unfilled sanctioned positions cause the deficit to become structural

rather than transient. Overwork, decreased service delivery, postponed investigations, and weakened accountability are all consequences of such structural gaps.

3. UN Benchmark and Its Relevance

A recommended standard of 222 police to population ratio of 1,000 residents is widely used as a reference point in other countries, and is not binding on India, however, which is used as a reference point to minimum manpower capacity. The benchmark applies in the Indian context as it assists in quantifying the degree of deficit and reinforces the argument that manpower sufficiency is core in the public safety and rule of law.

4. Indian Standards and Reform Context

The statutory manpower norm is not similar in all the States in India. Exclusively, the State governments authorize police strength on administrative evaluation and budgetary strength. Data on Police Organisations (DoPO) by BPR&D has been the main official data on authorised and real strength in States and UTs.

Additionally, read with reform jurisprudence is the adequacy of the police. In *Prakash Singh v. The Supreme Court (2006)* [4] Union of India, ordered structural reforms to enhance accountability, independence and professionalism in policing, however, the reforms could only be implemented in environments where the staffing case is chronic.

Literature Review (Concise)

The issue of police reform in India is well reported in the literature of policy and research. Structural problems identified in PRS Legislative Research include vacancies, weak accountability procedures, and imbalanced implementation of reforms across States. Committee reports and reform deliberations have repeatedly stated that understaffing is a source of overworking and impact of investigation quality.

Empirical research and institutional documentation, like the India Justice Report, show that there are still vacancy trends and inter-state inequalities. The literature also shows that manpower shortages correlate with the effect of operations through delayed investigations, low response capacity and low public confidence. The reports issued by NCRB on Crime in India give the statistical background of crime trends and criminal justice results, allowing one to discuss the trends and results of criminal justice with caution on causality.

Research Questions and Methodology

1. Research Questions

This study is guided by the following questions:

1. What is the gap between sanctioned and actual police strength across States and UTs as of the March 2023 period?
2. Which States show the highest vacancy percentages and lowest police per 1,00,000 population?

3. What are the functional consequences of manpower deficit for crime prevention, investigation, pendency, and conviction quality?
4. Can chronic vacancies be understood as a constitutional governance failure under Article 21 and reform jurisprudence?

2. Methodology

The paper adopts a hybrid method: doctrinal legal analysis combined with descriptive empirical analysis. The doctrinal part examines constitutional obligations and reform jurisprudence. The empirical part uses secondary data from official sources.

3. Data Sources

The primary sources used are:

- BPR&D DoPO for sanctioned and actual strength (as on 01.01.2023).
- NCRB Crime in India for population denominators and contextual crime/investigation statistics.
- Parliamentary and committee materials for corroborative evidence on vacancies and governance issues.
- PRS and India Justice Report for structured interpretation of official data.

4. Variables

variables include

- $Vacancies = Sanctioned - Actual$
- $Vacancy \% = (Vacancies / Sanctioned) \times 100$
- $Police\ per\ 1,00,000 = (Actual / Population) \times 100,000$

5. Limitations

The police-population ratio is only a proxy for policing effectiveness. The study does not claim causation between manpower and crime outcomes. Also, population denominators may not perfectly match the 'as-on' date of police strength data; this must be acknowledged in the final tables.

State-Wise Analysis of Police Strength (March 2023)

1. Comparative Findings

BPR&D DoPO data demonstrate that there is still a gap in sanctioned and actual strength across most States. 2 Big populous States tend to indicate low police per 1,000,000 inhabitants and high percentages of vacancies. Small States and other areas portray high police to 1,000,000, but this is mostly due to security stance and demographic indicatives as opposed to excellent policing ability.

2. Vacancy Patterns and Outliers

These figures show the sanctioned (S) and actual (A) police strength per lakh population in India, divided into different police categories.

Table Meaning

Category	Sanctioned (S)	Actual (A)	Explanation
Civil Police	132.60	103.47	Regular police working in police stations (law & order, investigation, patrol).
District Armed Reserve Police	23.55	17.27	Armed reserve units kept at district level for emergencies, riots, and reinforcement.
Armed Police	28.56	24.00	State armed battalions used for crowd control, riots, and security operations.
IRB Police (India Reserve Battalion)	12.17	10.10	Special battalions raised with central assistance for internal security.
Total Police Strength	196.88	154.84	Overall police personnel per lakh population in India.

Observation

- Sanctioned total police strength: 196.88 per lakh population
- Actual total police strength: 154.84 per lakh population

Shortage

$$196.88 - 154.84 = 42.04$$

So India has 42 fewer police personnel per lakh population than sanctioned strength.

Vacancy Percentage

$$\frac{42.04}{196.88} \times 100 \approx 21.35\%$$

So there is roughly 21–22% vacancy in the police force nationwide.

According to the Bureau of Police Research and Development (BPR&D) Data on Police Organizations in India, the sanctioned police strength in India is 196.88 personnel per lakh population, while the actual strength is only 154.84, indicating a shortfall of approximately 21%. This shortage affects investigation quality, response time, and the overall effectiveness of law enforcement.

State-wise vacancy patterns indicate that in many States, vacancies exceed 20% and in some cases exceed 30–40% in key ranks. This produces two distinct outlier patterns:

- High vacancy + low police per lakh: typically observed in large States with high population burdens.
- High police per lakh: often observed in smaller States, which cannot be interpreted as uniformly “better policing” because the denominator effect and deployment type matters.

3. Highest and Lowest Police Strength

The data on sanctioned and actual police strength across Indian States and Union Territories reveals significant regional disparities. In terms of overall numbers, Uttar Pradesh has the highest sanctioned strength of state armed police at 43,161 personnel and also the highest actual strength at 51,275, reflecting the large population and law-and-order requirements of the state. Among the civil police as well, Maharashtra and Uttar Pradesh maintain some of the largest sanctioned forces, with Maharashtra alone sanctioning 1,95,724 civil police personnel. In contrast, the smallest forces are found in smaller Union Territories. Lakshadweep has the lowest civil police strength with only 321 sanctioned and 252 actual personnel, while territories such as Dadra and Nagar Haveli and Daman and Diu and Puducherry also maintain relatively small forces due to their limited population and geographic size. This variation demonstrates how police strength is strongly influenced by demographic scale, administrative complexity, and security demands.

4. Police Recruitment as a Source of Employment

The persistent gap between sanctioned and actual police strength across many states highlights a major opportunity for employment generation. For example, at the All-India level, the sanctioned civil police strength is 18,33,779, while the actual strength is only 14,30,910, indicating a shortage of more than 4 lakh personnel. Similarly, district armed reserve police show a deficit of nearly 86,000 personnel nationwide. Filling these vacancies through regular

recruitment could simultaneously strengthen law enforcement capacity and create substantial government employment opportunities, particularly for youth. A structured annual recruitment system with transparent examinations, timely training, and predictable appointment cycles would not only improve policing efficiency but also contribute to economic stability by generating secure public sector jobs across the country.

5. Police per 1,00,000 Comparison

India’s national police per 1,00,000 ratio remains below both sanctioned levels and the UN benchmark. This supports the conclusion that India faces a structural manpower deficit rather than an isolated staffing gap.

Consequences of Police Personnel Shortage

1. Workload and Over-Policing Risks

Understaffing exerts more workload on the officers and less time to carry out lawful and careful policing. Stressed staff tend to commit oversights in the procedures like the delayed registration of the FIR, poor documentation, poor evidence management and use of informal practices. This raises the chances of the violation of rights as well as impairs the impartiality of criminal procedure.

Police manpower shortages may paradoxically generate a risk of over policing. When the police lack sufficient personnel to maintain regular community presence, investigation, and preventive engagement, law enforcement tends to rely on broad and reactive measures such as frequent stop-and-search operations, arbitrary detentions, and large-scale crowd-control tactics. Such practices often disproportionately affect marginalized communities and raise serious constitutional concerns under Articles 14, 19, and 21 of the Constitution of India, which guarantee equality before the law, fundamental freedoms, and protection of life and personal liberty.

2. Crime Prevention Limitations

Sustained patrol, beat policing, gathering of intelligence and fast response is essential in crime prevention. These functions are poor because of personnel shortage. Police stations with less than sufficient strength are frequently more focused on law and order tasks that are urgent and reactive than preventative policing. This enhances less deterrence and more reliance on emergency driven policing.

3. Investigation Delays and Pendency

Research is an intensive exercise of human resources. The understaffing results in several cases being grounded to a single investigating officer which lowers the time taken on each case and heightens delay. Loss of evidence, witness enmity and poor chain of custody are due to delay. This directly impacts on quality of charge sheets and raises pendency of both the police and court levels. Timely justice denial to victims (lack of timely justice) and the accused (long period of uncertainty or imprisonment) are other outcomes, which brings into question Article 21 issues on fair procedure and speedy trial.

4. Conviction Quality and Public Trust

The quality of investigations is important in determining the outcome of conviction. Understaffing can cause the high probability of poor construction of cases, its process, leading to acquittals or dismissal of prosecution. When the

response time is sluggish, the investigation time is delayed and the police are not easily available, it impacts on the public trust. Coercive enforcement or danger of corruption also undermines trust in case of overburdened policing. Police legitimacy is vital in constitutional terms in the rule of law.

Constitutional and Governance Implications

1. Article 21 and the Duty to Protect

Article 21, as developed through constitutional jurisprudence, is not confined to protection against arbitrary State action. It has been interpreted to include the right to live with dignity and safety, and the guarantee that any deprivation of liberty must follow a procedure that is fair, just, and reasonable. In that framework, policing is not a peripheral administrative function it is one of the primary ways through which the State secures the conditions necessary for the meaningful enjoyment of life and liberty.

When police forces operate with chronic understaffing, the State's ability to prevent violence, respond to crime, and conduct lawful and timely investigations is significantly weakened. Persistent failure to fill sanctioned posts is therefore not merely a matter of inefficiency or poor management; it may be viewed as a continuing failure of the State to discharge its positive obligation to protect life and personal liberty.

The constitutional concern goes deeper than reduced performance. If the State does not maintain minimum institutional capacity, fundamental rights risk becoming ineffective in practice. Victims may be left without timely protection and redress, while accused persons may face delayed investigations, procedural lapses, and prolonged uncertainty outcomes that directly undermine fairness and due process under Article 21.

2. Relevance of Prakash Singh Reforms

The directions issued by the Supreme Court in *Prakash Singh v. Union of India* were intended to strengthen policing by promoting accountability, functional autonomy, and professional standards. However, these reforms cannot operate effectively in a system that is chronically understaffed. Several of the Court's recommendations such as separating investigation duties from law-and-order responsibilities presuppose that the police force has adequate personnel to create dedicated units and sustain specialized roles.

Where staffing levels remain deficient, officers are compelled to manage multiple functions simultaneously, often under extreme workload pressure. In such circumstances, meaningful professionalisation becomes difficult, and internal accountability structures tend to weaken because the system is focused on managing immediate operational burdens rather than ensuring reform compliance.

Accordingly, the failure to fill sanctioned posts does not only reduce day to day policing capacity. It also obstructs the implementation of institutional reforms mandated for constitutional and democratic policing. In this sense, manpower shortage becomes a structural barrier to reform and a continuing challenge to rights consistent law enforcement.

3. Accountability of States for Vacancies

Since policing is primarily a matter within the State's domain, State governments carry the main responsibility for ensuring that recruitment is timely, training systems are adequate, and personnel are deployed where they are most

needed. When vacancies continue year after year, it reflects more than a temporary staffing gap. It points to deeper weaknesses in governance such as poor recruitment planning, limited training capacity, and failure to allocate sufficient resources to a core public function. Over time, such vacancies stop looking like an exception and begin to function as a permanent institutional deficit.

This situation also has an equality dimension. Areas that remain under policed often experience slower response, weaker preventive presence, and reduced access to effective protection. In practical terms, citizens in different districts may not receive the same level of safety and law enforcement support. Such uneven delivery of the State's protective role raises concerns under Article 14, because the benefits of policing security, access to justice, and institutional protection are not distributed uniformly across regions.

Recommendations and Reform Model

1. Time-Bound Recruitment and Vacancy Filling

A stable and predictable recruitment process is crucial for addressing police vacancies in a meaningful way. States should move towards an annual recruitment calendar with clear and fixed timelines for issuing notifications, conducting examinations, completing training, and making appointments. Priority should be given to filling vacancies at the constable level and within investigation related ranks, because these posts form the backbone of day to day policing and directly affect investigation quality.

Delays in recruitment should not be treated as routine administrative lapses. They must be recognised as failures of governance, since they weaken a core public institution. Greater accountability can be ensured by requiring regular reporting to State legislatures on the number of vacancies, the stage of recruitment processes, and the progress made in filling posts. This would create transparency and reduce the tendency for vacancies to remain unresolved over long periods.

2. Deployment Rationalization

Manpower adequacy is not only about numbers but also about allocation. States should reduce diversion of police personnel to non core duties such as excessive VIP security, ceremonial postings, and administrative work. Functional mapping should be conducted to ensure police stations, investigation units, and emergency response systems meet minimum staffing requirements.

3. Training and Forensic Support

Recruitment without capacity building risks expanding numbers without improving outcomes. Training infrastructure should be strengthened, and continuous in service training should be ensured. Forensic access must be improved because investigation failures often arise from weak evidence collection, poor chain of custody, and limited scientific support. Strengthening forensic support can improve conviction quality even without drastic manpower increases.

4. Transparency and Performance Monitoring

States should publish annual data on sanctioned strength, actual strength, vacancies, and vacancy percentages. District level reporting is necessary to prevent internal masking of shortages. Performance monitoring should include indicators such as response time, investigation pendency, and charge sheet timelines. Independent audits can strengthen credibility.

Conclusion

This paper has shown that India faces a structural police manpower deficit. The national police to population ratio remains below sanctioned levels and below internationally cited benchmarks. The state wise analysis reveals significant disparities: large populous States frequently show high vacancy percentages and low police per 1,00,000 population, while small States may show high ratios due to denominator effects and security posture.

The consequences of this deficit are substantial. Understaffing increases workload, weakens preventive policing, delays investigations, contributes to pendency, and reduces case quality. These outcomes affect victims, accused persons, and public trust in law enforcement. The deficit also undermines implementation of police reform directives, including those recognized in *Prakash Singh v. Union of India*, (2006)^[4].

The police manpower deficit must therefore be treated as a governance failure with constitutional implications. The State's duty under Article 21 is not limited to non-interference; it includes ensuring minimum institutional capacity for protection, lawful investigation, and fair criminal justice administration. Chronic vacancies, if left unaddressed, risk making constitutional guarantees ineffective in practice.

Filling these vacancies would not only strengthen law enforcement and improve public safety but also generate large-scale employment opportunities for young people. Increasing recruitment in civil police, armed police, and reserve forces can reduce unemployment while ensuring better policing, faster investigations, and improved maintenance of law and order.

The way forward requires time-bound recruitment, rational deployment, strengthening training and forensic systems, and transparent manpower reporting. These reforms must be pursued not merely as administrative improvements but as constitutional governance measures essential for rule of law and rights compliant policing.

References

1. PRS Legislative Research, Police Reforms in India (noting police-population ratio and UN benchmark; discusses vacancies and structural issues).
2. Bureau of Police Research & Development (BPR&D), Data on Police Organisations (DoPO), as on 01.01.2023 (sanctioned and actual strength tables).
3. PRS Legislative Research, Police Reforms in India (UN recommended benchmark of 222 per 1,00,000 used as reference in Indian policy discussion).
4. *Prakash Singh v. Union of India*, (2006) 8 SCC 1 (Supreme Court directions on police reforms).
5. India Justice Report Police chapter (vacancy percentages and state comparisons), 2022.
6. National Crime Records Bureau, Crime in India (population denominators and criminal justice statistics), 2022.
7. Parliamentary/Committee reports (for vacancy corroboration and governance analysis).
8. U.N. Office on Drugs & Crime, Handbook on Police Accountability, Oversight and Integrity (United Nations, 2011), https://www.unodc.org/pdf/criminal_justice/Handbook_on_police_Accountability_Oversight_and_Integrity.pdf.