

COMPARATIVE POLICE REFORMS: EVALUATING THE IMPACT OF GOVERNANCE AND ACCOUNTABILITY MEASURES IN INDIA AND AUSTRALIA

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Abstract

Policing plays a crucial role in maintaining law, order and democratic governance, making police reform a central concern for contemporary states. Over the past two decades, both developed and developing countries have pursued reform initiatives aimed at enhancing police accountability, operational autonomy, human rights compliance and public trust. Despite shared colonial policing legacies, India and Australia have followed markedly different reform trajectories. This paper presents a comparative analysis of police reforms in India and Australia, focusing on three core dimensions: governance and autonomy, accountability mechanisms and community engagement strategies. Drawing on Procedural Justice Theory and Legitimacy Theory of Policing, the study employs a qualitative, descriptive and analytical research design based on secondary data sources, including legislation, judicial directives, official reports and scholarly literature. The findings reveal that while India has introduced significant legal and judicial reforms—such as the Prakash Singh directives and the Punjab Police Act, 2007—implementation remains weak due to persistent political interference, limited operational autonomy and ineffective oversight institutions. In contrast, Australia has successfully institutionalized independent oversight bodies, integrity management systems and community policing practices, contributing to higher levels of public trust and police legitimacy. The comparative analysis highlights that effective police reform requires not only legal frameworks but also sustained political commitment, empowered accountability institutions and cultural transformation within police organizations. The study identifies transferable lessons for both countries, emphasizing the relevance of cross-national learning in strengthening democratic policing. The paper contributes to the limited comparative literature on police reforms by offering policy-relevant insights for scholars, practitioners and policymakers.

Keywords: Police reforms, Police accountability, Community policing, Police legitimacy, Procedural justice.

1. Introduction

Policing remains a central institution in the maintenance of law, order and democratic governance across nations. Over the past two decades, police reforms have been increasingly emphasized in both developed and developing countries to address issues of accountability, efficiency, human rights compliance and public trust (Bayley, 2006; Goldsmith & Lewis, 2000). While the challenges facing police organizations are global, the reform pathways adopted by different countries vary substantially, shaped by their socio-political, historical and legal contexts (Newburn, 2005).

India and Australia, despite being Commonwealth countries with shared British colonial policing legacies, have developed divergent models of police governance. In India, police reforms have been sporadic, often driven by judicial interventions such as the landmark directives issued by the Supreme Court in *Prakash Singh & Others vs. Union of India* (2006) and the enactment of state-specific laws like the Punjab Police Act, 2007. However, issues such as political interference, lack of functional autonomy and resource deficits continue to hamper effective reform implementation (Verma, 2005; Singh, 2011).

Conversely, Australia has pursued systematic police modernization, emphasizing community policing, accountability and the establishment of independent oversight agencies such as the Independent Broad-based Anti-corruption Commission (IBAC) in Victoria and the Australian Commission for Law Enforcement Integrity (ACLEI) at the federal level (Prenzler,

2011). These bodies have contributed to enhancing public confidence in policing while addressing misconduct and corruption within the ranks (Porter & Prenzler, 2012).

Despite the growing scholarly literature on national policing systems, comparative research that examines police reforms between India and Australia remains limited. This study seeks to fill this gap by conducting a thematic comparison of governance structures, accountability mechanisms and community engagement strategies in both countries. The core research question guiding this inquiry is: **What lessons can India and Australia offer each other in the realm of police reforms and accountability enhancement?**

Such a comparative analysis is timely and relevant, considering global discourses on police legitimacy, the use of force and public oversight mechanisms. By identifying best practices and reform challenges, this paper aims to inform policymakers, scholars and practitioners engaged in strengthening police governance in both contexts.

2. Literature Review

2.1 Police Reforms in India

India's policing system has long been criticized for its colonial legacy, centralized control and political interference (Verma, 2005; Bayley, 2007). Despite numerous recommendations by committees such as the National Police Commission (1977–1981) and subsequent judicial interventions, including the Supreme Court's landmark judgment in *Prakash Singh & Others vs. Union of India* (2006), reforms have remained largely unimplemented at the ground level (Singh, 2011). The Punjab Police Act, 2007, for example, aimed to establish

autonomy in police functioning and improve accountability through institutional mechanisms like Police Complaints Authorities and Establishment Boards. However, studies suggest that these reforms have not been effectively institutionalized, with political interference and weak oversight mechanisms persisting as major obstacles (Jangra & Sehgal, 2022; Human Rights Watch, 2009).

Scholars argue that India's federal structure, coupled with diverse socio-economic challenges, complicates the process of police reform (Verma, 2005). Issues such as inadequate resources, insufficient training and lack of community engagement practices further exacerbate the gap between reform intent and actual implementation (Singh, 2011).

2.2 Police Reforms in Australia

In contrast, Australia has witnessed a relatively successful trajectory of police reform, particularly since the 1980s, emphasizing integrity management, accountability and community policing (Prenzler, 2011). The establishment of independent oversight bodies such as the Independent Broad-based Anti-corruption Commission (IBAC) in Victoria and the Law Enforcement Conduct Commission (LECC) in New South Wales has strengthened public trust and ensured greater transparency in police operations (Porter & Prenzler, 2012).

Community policing has emerged as a central pillar in Australian police practice, focusing on proactive crime prevention and collaboration with local communities (Fleming, 2010). Australian police services have also integrated technology-driven solutions, such as body-worn

cameras and data-driven policing, to enhance operational efficiency and public accountability (Mazerolle et al., 2013).

2.3 Comparative Perspectives on Police Governance

Comparative studies on police reforms underscore the significance of contextual factors—political systems, legal traditions and societal expectations—in shaping reform outcomes (Bayley, 2006; Newburn, 2005). While Australia represents a model of professionalized, community-oriented policing with institutionalized oversight, India reflects the complexities of implementing reforms within a politically influenced and resource-constrained environment (Loader & Walker, 2007).

Despite these differences, there are valuable lessons each country can draw from the other. For instance, India's experience with large-scale, diverse populations could inform Australia's policing strategies in multicultural urban centers. Conversely, Australia's success with independent oversight institutions offers a potential roadmap for enhancing police accountability in India.

3. Research Gap

A review of the existing literature reveals a significant gap in direct comparative analyses between Indian and Australian police reforms. Most studies are country-specific, focusing either on Indian policing challenges or Australian integrity management systems. This study addresses this lacuna by providing a cross-national comparative analysis aimed at identifying transferable lessons and best practices in police governance and reform.

4. Theoretical Framework

The study is anchored in two major criminological theories that shape police reform and governance globally: Procedural Justice Theory and the Legitimacy Theory of Policing.

4.1 Procedural Justice Theory

According to Tyler (2004), the perception of fairness in police processes significantly influences public cooperation and compliance with the law. Citizens are more likely to obey laws and cooperate with law enforcement if they perceive police officers as fair, unbiased and respectful. This is especially relevant to the Australian context, where community policing and procedural justice practices are integral to policing strategies (Mazerolle et al., 2013). In India, however, the lack of procedural fairness—manifested through delays, corruption and discriminatory practices—undermines public trust and compliance (Verma, 2005). The discrepancy highlights the necessity for India to embed procedural justice principles within its policing culture to enhance legitimacy.

4.2 Legitimacy Theory of Policing

The legitimacy of police institutions, as proposed by Beetham (1991) and expanded by Tankebe and Tyler (2011), depends on public belief in the rightful authority of the police. A legitimate police force enjoys voluntary compliance from the public, reducing reliance on coercion. Australia has made significant progress in institutionalizing legitimacy through independent oversight (IBAC, LECC), public accountability and transparency. In contrast, India's struggles with political interference and weak oversight compromise police legitimacy, resulting in public

alienation and resistance (Bayley, 2007; Human Rights Watch, 2009).

Thus, this study uses these two theoretical lenses to explain why Australian police reforms are perceived as more successful and sustainable compared to India's largely symbolic or incomplete reform efforts.

5. Research Methodology

5.1 Research Design

This study adopts a comparative, descriptive and analytical research design, focusing on the critical evaluation of police reform initiatives in India and Australia. The purpose is to identify similarities, differences and lessons that can inform future reforms in both countries. A qualitative approach based on secondary data analysis is employed to ensure a comprehensive understanding of the existing frameworks, practices and outcomes associated with police governance and reform in these jurisdictions.

5.2 Data Sources

Data for this research has been collected entirely from secondary sources to ensure relevance, credibility, and cross-national comparability. Although this approach limits access to practitioner-level perceptions and informal practices, it is well suited for cross-national policy analysis and institutional comparison. Key sources include:

5.2.1 Legislative documents and policy frameworks

- Punjab Police Act, 2007 (India)
- Supreme Court Directives in Prakash Singh vs. Union of India (2006) (India)
- State and Federal police reform legislations (Australia)

- Independent Broad-based Anti-corruption Commission (IBAC) reports (Victoria, Australia)
- Australian Commission for Law Enforcement Integrity (ACLEI) reports (Federal, Australia)

5.2.2 Official reports

- National Crime Records Bureau (NCRB) reports (India)
- Productivity Commission reports on policing (Australia)
- Annual reports of state-level police oversight bodies (Australia)

5.2.3 Scholarly literature

- Peer-reviewed journal articles, books and research papers on policing, reforms and governance in India and Australia.

5.2.4 Reports by international organisations

- Human Rights Watch (2009) report on Indian police functioning
- Transparency International reports on policing and integrity management

5.3 Method of Analysis

The collected data has been subjected to thematic analysis, focusing on three major dimensions of police reforms:

- Governance and Autonomy (e.g., independence from political control, operational autonomy)
- Accountability Mechanisms (e.g., oversight bodies, anti-corruption agencies, complaints redressal systems)
- Community Engagement Strategies (e.g., community policing models, public trust initiatives, procedural justice practices)

A comparative framework has been developed to contrast these dimensions across India and

Australia. The strengths, weaknesses, and transferable lessons are systematically identified through this method.

5.4 Ethical Considerations

As the study relies solely on publicly available secondary data, there are no human participants involved. Therefore, formal ethics clearance was not required. However, due diligence was exercised to ensure the use of credible, authoritative and properly cited sources.

5.5 Limitations

The reliance on secondary data may limit the depth of practical insights, particularly regarding informal policing practices and officer-level perceptions. Additionally, differences in the socio-political environments of India and Australia may constrain the generalizability of certain findings.

6. Findings and Analysis

This section presents the comparative analysis of police reforms in India and Australia across three major thematic dimensions: Governance and Autonomy, Accountability Mechanisms and Community Engagement Strategies.

6.1 Governance and Autonomy

6.1.1 India

Despite judicial interventions and legislative reforms such as the Punjab Police Act, 2007, the operational autonomy of police in India remains limited (Singh, 2011). Political interference continues to influence police appointments, transfers and investigations, undermining the independence of law enforcement agencies (Verma, 2005). The establishment of State Security Commissions and Police Establishment Boards, mandated by the Prakash Singh

directives, has seen partial or weak implementation across Indian states (Human Rights Watch, 2009).

6.1.2 Australia

Australian police organizations enjoy a higher degree of institutional and operational autonomy. State and federal police services operate under well-defined legislative frameworks that limit direct political control over operational matters (Prenzler, 2011). The clear separation between executive authority and police leadership has contributed to the professionalization and credibility of policing services (Porter & Prenzler, 2012).

6.2 Accountability Mechanisms

6.2.1 India

Accountability remains a major concern in the Indian policing system. While the Punjab Police Act, 2007 provides for the establishment of independent Police Complaints Authorities (PCAs) at the state and district levels, these bodies have largely remained ineffective due to inadequate resources, lack of statutory backing and resistance from political and police leadership (Jangra & Sehgal, 2023). Moreover, incidents of custodial violence, corruption and abuse of power persist, reflecting systemic

deficiencies in oversight mechanisms (Human Rights Watch, 2009).

6.2.2 Australia

Australia has successfully institutionalized robust police accountability frameworks. Oversight bodies such as IBAC in Victoria, the Law Enforcement Conduct Commission (LECC) in New South Wales and the Australian Commission for Law Enforcement Integrity (ACLEI) at the federal level provide independent investigation into police misconduct (Prenzler, 2011). These institutions are legally empowered, resourced and widely regarded as effective tools for promoting police integrity (Porter & Prenzler, 2012).

6.3 Community Engagement Strategies

6.3.1 India

Community policing in India remains underdeveloped and inconsistent across states. While pilot initiatives such as 'Community Policing Schemes' have been launched in various regions, including Punjab, the lack of institutionalization and resource allocation limits their effectiveness (Verma, 2005). Public trust in police remains low, often shaped by perceptions of bias, corruption and inefficiency.

6.3.2 Australia

Community policing forms the cornerstone of

Table 1: Comparative Summary

Dimension	India	Australia
Governance & Autonomy	Weak autonomy; political interference persists	Operational autonomy safeguarded by law
Accountability Mechanisms	Weak or inactive oversight bodies (PCAs)	Strong, independent agencies (IBAC, LECC, ACLEI)
Community Engagement	Inconsistent and underfunded efforts	Institutionalized community policing strategies

Australian policing philosophy. Programs focusing on problem-oriented policing, procedural justice and partnerships with local communities have been integrated into routine police operations (Fleming, 2010; Mazerolle et al., 2013). These efforts have significantly improved public perceptions of police legitimacy, especially among multicultural and Indigenous communities.

6.4 Key Findings

- Australia offers a strong model of independent oversight and community policing that India can adapt.
- India's challenges of political interference and resource deficits remain substantial barriers to reform implementation.
- Australia can learn from India's experience in managing diverse and large populations, particularly in urban multicultural areas.

7. Discussions

The comparative analysis of police reforms in India and Australia reveals both shared challenges and context-specific differences shaped by each country's political systems, institutional capacities and historical legacies. This section interprets these findings in light of global theories on police governance and reform, while also considering the policy relevance of cross-national learning.

7.1 Governance and Operational Autonomy

The study highlights that operational autonomy remains a critical weakness in the Indian policing system, despite constitutional and legislative reform efforts such as the Prakash Singh directives and the Punjab Police Act, 2007 (Singh, 2011; Jangra & Sehgal, 2023). The persistence of

political control over police appointments, postings, and case-handling decisions undermines the effectiveness of Indian policing—a phenomenon consistent with Bayley's (2006) analysis of postcolonial policing structures. In contrast, Australia's formal separation of police from political influence, supported by independent oversight bodies, demonstrates the importance of safeguarding institutional independence to promote professionalism and public trust (Prenzler, 2011). This divergence supports Newburn's (2005) argument that political culture significantly influences police reform trajectories. In India, enduring patronage networks and politicized state institutions restrict the realization of reform objectives, while Australia's Westminster model facilitates a clearer separation between executive control and police operations.

7.2 Accountability Mechanisms and Oversight

The findings confirm that effective accountability mechanisms are central to public trust and legitimacy in policing (Loader & Walker, 2007). Australian oversight agencies such as IBAC and LECC offer credible, independent forums for investigating police misconduct—a feature largely absent or ineffectual in India, where Police Complaints Authorities lack enforcement powers and operational autonomy (Verma, 2005).

This disparity reflects Prenzler's (2011) assessment that institutional design—especially the statutory independence of oversight bodies—is crucial to police integrity management. For India, merely establishing oversight bodies without granting them real power or independence fails to address systemic

abuse risks. Conversely, Australia's model shows that empowered, well-resourced integrity agencies can meaningfully deter misconduct and enhance police accountability.

7.3 Community Engagement Practices

A key finding of this study is the successful institutionalization of community policing in Australia, where programs focus on collaborative problem-solving, citizen trust, and procedural justice (Fleming, 2010; Mazerolle et al., 2013). In India, by contrast, community policing initiatives remain fragmented and project-based rather than integrated into mainstream police functions (Bayley, 2007).

The Australian approach aligns with theoretical models of legitimacy-based policing that emphasize transparency, respect, and public involvement (Tyler, 2004). In India, structural barriers such as manpower shortages, lack of training, and public distrust hinder the full realization of such models.

8. Transferable Lessons and Cross-National Relevance

Despite contextual differences, this comparative study identifies important transferable lessons:

- **For India:** Australia's experience underscores the importance of legally empowered, independent oversight agencies and the institutionalization of community policing as an operational philosophy rather than an ad hoc practice.
- **For Australia:** India's strategies for large-scale policing in highly diverse and populous environments offer insights into managing multicultural urban centers, a growing challenge in Australian cities

(Bayley, 2007). Moreover, Australia could examine India's emphasis on resource efficiency and cost-conscious policing in lower-income or rural contexts.

9. Theoretical and Policy Implications

The study confirms that the effectiveness of police reforms is contingent upon political will, legal empowerment of oversight bodies, and organizational culture change—consistent with global criminological theories on police legitimacy and democratic policing (Loader & Walker, 2007; Bayley, 2006). Reforms that focus solely on structural or legal changes without addressing political interference and cultural norms are unlikely to yield sustained impact, as evidenced in the Indian context.

For policymakers, this suggests that a holistic reform approach—combining legal, organizational, and cultural change—is essential to improving police governance. Future reform strategies in both countries could benefit from bilateral dialogues, joint training programs, and research collaborations focused on police accountability and public trust.

The findings of this study underscore the critical role of **Procedural Justice Theory and Legitimacy Theory** in explaining variations in policing outcomes across India and Australia. In Australia, police organizations have systematically incorporated procedural justice principles—ensuring that public encounters are marked by fairness, respect and neutrality (Mazerolle et al., 2013). This operationalization of procedural justice fosters a sense of legitimacy among the populace, which in turn encourages voluntary

compliance with laws and cooperation with law enforcement agencies (Tyler, 2004).

Conversely, in India, procedural justice remains an underdeveloped concept within police practices. Instances of arbitrary decision-making, corruption and abuse of power erode public confidence and challenge police legitimacy (Verma, 2005). The failure to embed procedural fairness mechanisms weakens the perceived legitimacy of the police and diminishes public willingness to cooperate (Bayley, 2007).

Legitimacy Theory also explains the divergence in outcomes. Australia's use of independent oversight bodies (such as IBAC and LECC) enhances institutional legitimacy by demonstrating accountability and transparency (Prenzler, 2011). In India, the absence of functioning oversight bodies (like effective Police Complaints Authorities) perpetuates public skepticism regarding the impartiality and trustworthiness of the police (Human Rights Watch, 2009).

This theoretical insight confirms Loader and Walker's (2007) proposition that legitimacy is both a moral and practical necessity for democratic policing—without which law enforcement agencies struggle to maintain public order effectively.

10. Recent Developments in Police Reforms (Post-2022)

Recent years have witnessed significant technological and policy-oriented developments in policing reforms in both India and Australia. In India, initiatives such as the expansion of the Crime and Criminal Tracking Network and Systems (CCTNS), increased use of digital FIRs, and renewed emphasis on police modernization

schemes have aimed to enhance transparency and service delivery (Ministry of Home Affairs [MHA], 2022, 2023). Several states have also experimented with body-worn cameras and digital surveillance tools, although implementation remains uneven (Bureau of Police Research and Development [BPR&D], 2023).

In Australia, post-2022 reforms have focused on strengthening integrity systems and leveraging technology-driven policing. The expanded use of body-worn cameras, data analytics for crime prevention, and enhanced oversight of police use of force reflect a continued commitment to accountability and public trust (Australian Institute of Criminology [AIC], 2023; Fleming, 2023). These developments demonstrate a growing convergence around technology-enabled policing, while also highlighting differences in institutional capacity and governance frameworks (Prenzler & Porter, 2022).

11. Conclusion and Policy Recommendations

This study comparatively examined police reforms in India and Australia across governance and autonomy, accountability mechanisms and community engagement. While both countries acknowledge the need for reform, their outcomes differ markedly due to variations in political will, institutional capacity and resource allocation. In India, despite legislative and judicial initiatives, reform implementation remains uneven and largely symbolic, constrained by political interference and weak oversight. In contrast, Australia has effectively institutionalized independent accountability mechanisms and community-oriented policing, resulting in higher

public trust and police legitimacy. The analysis underscores that meaningful police reform extends beyond legal provisions and depends on sustained political commitment, organizational transformation and active public engagement.

12. Policy Recommendations

Based on the findings, the following policy recommendations are proposed for enhancing police reform outcomes in both India and Australia:

12.1 For India

- **Strengthen Oversight Institutions:** Empower Police Complaints Authorities with statutory independence, sufficient resources, and enforcement powers to investigate complaints effectively, similar to Australia's IBAC and LECC models.
- **Ensure Operational Autonomy:** Fully implement the Prakash Singh directives across all states to insulate police leadership from political interference in appointments, transfers, and operational decision-making.
- **Institutionalize Community Policing:** Move beyond pilot schemes to embed community policing as a core operational strategy, supported by dedicated training, staffing, and resource allocation.
- **Capacity Building:** Invest in continuous professional development, modern equipment, and technological tools such as body-worn cameras and digital case management systems to improve accountability and efficiency.

12.2 For Australia

- **Manage Diversity Challenges:** Draw lessons from India's experience of policing

large, diverse populations to improve community engagement in multicultural urban areas and with Indigenous communities.

- **Sustain Oversight Vigilance:** Continuously review and strengthen oversight bodies to adapt to emerging challenges such as cybercrime, terrorism, and transnational crime.
- **Enhance Resource Efficiency:** Explore cost-effective policing models inspired by India's practices in resource-constrained environments, particularly relevant for rural and remote policing.

12.3 For Both Countries

- **Promote Bilateral Knowledge Exchange:** Establish India-Australia joint forums for police training, research collaborations, and best practice sharing to foster mutual learning in police governance.
- **Encourage Cross-National Research:** Support further empirical studies examining the impact of specific reforms on public trust, crime reduction, and police accountability to inform evidence-based policy making.

13. Future Research Directions

While this study offers a foundational comparative perspective, future research should incorporate primary data collection—such as interviews with police officials, oversight agency staff, and community members—to enrich the analysis with practitioner and public viewpoints. Additionally, longitudinal studies could assess the impact of recent or ongoing reforms over time in both countries.

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