



BALANCING JUDICIAL EFFICIENCY AND FAIR TRIAL: THE ROLE OF THE RIGHT TO SPEEDY TRIAL IN STRENGTHENING RULE OF LAW IN INDIA

Varsha Shambhubhai Desai

B 305, Vishwash City 9, Near Simandhar Status, Gota, Ahmedabad, Gujarat

Abstract

This article examines the importance of Article 21 of the Indian Constitution, which protects the right to a speedy trial, in supporting the nation's judicial system. People's personal freedom and access to justice are safeguarded by the right to a timely trial, which forbids prolonged detention without an opportunity for self-defense. Even though it is guaranteed by the constitution, the Indian legal system has consistently struggled with delays in court proceedings, which are made worse by an overworked judiciary, a lack of resources, and ineffective procedures. This essay explores how to strike a balance between judicial efficiency and fairness, emphasizing the negative social and legal effects of postponed trials, such as the deterioration of public confidence and the infringement of the accused's rights. This paper examines attempts by the Indian judiciary to alleviate delays, including the creation of fast-track courts, the use of technology, and the adoption of alternative conflict resolution procedures, through an analysis of significant case statutes and judicial reforms. There are still issues, though, such as inadequate infrastructure, poor judge-to-population ratios, and cultural opposition to change. In order to promote a judicial system that provides prompt and equitable justice, the paper makes proposals for enhancing judicial efficiency while guaranteeing the preservation of fundamental rights.

Keywords: Speedy trial, Judicial efficiency, Fair trial, Indian judiciary, Legal reforms.

1. Introduction

The right to a speedy trial is one of the essential rights protected by Article 21 of the Indian Constitution, which also safeguards life and individual freedom. This right ensures that an accused person will not be detained for a long time without being allowed to defend themselves because it directly impacts their liberty and access to justice. It is recognized as a procedural right as well as an essential element in ensuring the overall fairness and efficiency of the legal system. The importance of a speedy trial has always been emphasized by the Indian court, which acknowledges its responsibility to uphold the rule of law and protect people's dignity.

The right to a speedy trial finds its roots in the principle that justice delayed is justice denied. As noted by the Supreme Court of India in *Hussainara Khatoon v. State of Bihar (1979)*¹, A fair and just legal system is built on the foundation of the right to a prompt trial. According to the court's opinion in *Hussainara Khatoon v. State of Bihar (1979)*, "the right to a speedy trial is an integral aspect of the right to life and personal liberty under Article 21 of the Constitution." Since then, the Supreme Court has maintained the importance of this principle while court interpretations have progressively broadened it.

Delays in the legal system continue to be a major problem for the Indian legal system, nonetheless, in spite of this fundamental safeguard. The goal of the right to a fast trial has frequently been undermined by drawn-out trials brought on by the backlog of cases, judge shortage, and procedural inefficiencies. In addition to having an impact on the accused, this circumstance erodes public confidence in the judiciary's capacity to administer prompt justice. Concern over how trial delays cause disproportionate suffering, particularly for those in pretrial detention, which the courts have acknowledged as a breach of the fundamental right to life and liberty, has grown in recent years. Recent studies and reports have highlighted the growing pressure on India's judicial system to balance the demand for speed with the need for fairness. According to a report by the *National Judicial Data Grid (2020)*², as of 2020, the pendency of cases in Indian courts was over 3.5 crore (35 million), with many trials taking years to complete. These figures highlight the difficulties the legal system faces in striking

¹ "Hussainara Khatoon v. State of Bihar, AIR 1979 SC 1360".

² National Judicial Data Grid. (2020). *Pendency of cases in Indian courts*. Retrieved from <https://njdg.ecourts.gov.in/>



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a balance between providing prompt justice and guaranteeing a fair trial. In response to these challenges, the judiciary has implemented a variety of strategies, including the creation of fast-track courts, the implementation of case management systems, and increased use of technology in court proceedings. Even though these initiatives have seen considerable progress, much more has to be done to ensure that everyone in India has the right to a speedy trial.

This article's goal is to investigate the application of the right to a fast trial in India, as well as how it upholds justice and strengthens the rule of law. This essay will also evaluate the difficulties the Indian legal system faces in striking a balance between the values of justice and fairness and judicial efficiency. This study attempts to offer suggestions for enhancing the prompt administration of justice without sacrificing the rights of the accused by examining recent changes, case laws, and the real-world effects of delays.

1.1. Importance of balancing judicial efficiency and fairness

Any legal system's legitimacy and credibility depend on striking a balance between judicial efficiency and justice. The goal of judicial efficiency is to minimize court proceedings' delays by making sure that legal procedures are completed promptly. It is essential for avoiding case backlogs, lessening the workload for the courts, and guaranteeing that justice is served promptly. Fairness, on the other hand, is a fundamental principle that ensures due process is always followed and all parties are treated equally during judicial procedures. The problem occurs when attempts to speed up the trial process run the risk of jeopardizing its integrity, especially by reducing the accused's rights or their ability to mount a strong defense.

In the Indian context, delays in judicial proceedings have been a longstanding issue. The pendency of cases in courts has reached alarming levels, leading to what is commonly referred to as a "judicial backlog." According to a study by *Jain et al. (2018)*³, the average time taken for the disposal of a case in India can range from several months to years, significantly affecting the speed at which justice is delivered. In addition to having an impact on the accused, these delays create a backlog that puts a great deal of strain on the legal system, frequently leading to victims' prolonged suffering and extended pretrial incarceration. Vulnerable groups in society who might not have the means to withstand the drawn-out legal procedure might be most harmed by trial delays.

Efficiency is important, but fairness should not be sacrificed for efficiency. All legal processes must be followed in order for a trial to be fair, including the accused's rights to legal representation, the opportunity to contest evidence, and a public hearing. The process runs the risk of becoming a formality that ignores the parties' substantive rights if these rights are curtailed in the interest of expediting a trial. Prantik & Saha et al., (2024)⁴ discusses this dynamic, noting that reforms must ensure that judicial efficiency does not lead to the violation of the basic rights afforded to individuals under the law.

The recent establishment of fast-track courts in India, as discussed by *Sharma and Mohit (2023)*⁵, has been a step toward addressing the backlog, but it has also raised concerns about whether expediency might compromise fairness. The increased use of technology, such as e-courts and automated case management systems, has shown promise in reducing delays without compromising the fairness of proceedings. According to *Zalnieriute et al., (2020)*⁶, the integration of technology in the judicial process has significantly improved case management, enabling quicker resolutions while ensuring that the rights of the parties are respected.

³ "Jain, M. P. (2018). *Indian Constitutional Law* (8th ed.). LexisNexis".

⁴ Indian, & Social, & Vo, & Basak, Prantik & Saha, Jhilike. (2024). Towards a Unified Legal Framework: Exploring the Case for a Uniform Civil Code in India. *INDIAN JOURNAL OF SOCIAL STUDIES AND HUMANITIES* Vo. 1 (17)/ Jan-March 2024 ISSN NO. 2277-7458. 55-61.

⁵ Sharma, Mohit. (2023). India's Courts and Artificial Intelligence: A Future Outlook. *LeXonomica*. 15. 10.18690/lexonomica.15.1.99-120.2023.

⁶ Zalnieriute, Monika & Bell, Felicity. (2020). Technology and the Judicial Role. 10.2139/ssrn.3492868.



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2. Legal Framework

India's constitutional structure provides a solid foundation for the right to a quick trial, ensuring that each citizen's freedom is protected and that justice is administered promptly. The foundation of this right is Article 21 of the Indian Constitution, which guarantees the protection of life and individual liberty. According to the Supreme Court of India's many interpretations of this provision, the right to a quick trial is an essential component of the right to life and personal liberty. The Court has stressed that trial delays may violate the accused's constitutional rights and cause them to suffer for an extended period of time. As noted by Meena and Khoda. (2024)⁷, "The right to a speedy trial is an integral part of Article 21, as it ensures that an individual's right to life is not compromised by excessive detention or prolonged legal proceedings."

The main piece of legislation controlling criminal proceedings in India, including the prompt conduct of trials, is the "Code of Criminal Procedure (CrPC)." All trials must be completed promptly, according to Section 309 of the CrPC, which also permits courts to postpone procedures only in dire circumstances. By highlighting the importance of prompt hearings, it seeks to reduce trial delays. The right to a quick trial is indirectly supported by the CrPC's protections against protracted imprisonment, such as Section 57's requirement that an accused person in custody appear before the court within 24 hours. This provision also prohibits excessive pretrial detention. However, as Kaur and Pawandeep (2024)⁸ points out, despite these provisions, there are challenges in their effective implementation due to resource constraints, judicial inefficiency, and procedural hurdles.

Important case law has shaped India's understanding of the right to a speedy trial. In the development of this privilege, the *Hussainara Khatoon v. State of Bihar* (1979) case marked a significant turning point. The Supreme Court highlighted the plight of prisoners who had been held for extended periods without being given the opportunity to defend themselves when it decided that Article 21 of the Constitution secured the right to a quick trial. The Court's decision recognized that prolonged detention without accusation or trial was a violation of the right to personal liberty and human dignity. This landmark ruling prompted further judicial activism on the issue of judicial delays and resulted in significant modifications aimed at expediting the trial process (*Hussainara Khatoon v. State of Bihar*, 1979).

Maneka Gandhi v. Union of India (1978) is another important decision where the Supreme Court interpreted "life" and "personal liberty" more broadly, hence broadening the application of Article 21. The Court decided that any action affecting a person's right to liberty or life must be fair, reasonable, and just. Even though the main focus of this case was administrative orders, it established the fundamental idea that delays in court proceedings, including trials, could not be justified unless they satisfied the Constitution's requirements for justice and fairness. The case of *Maneka Gandhi*⁹ further clarified the constitutional guarantees surrounding the right to life, setting the stage for the judicial emphasis on speedy trials.

Additionally, in *State of Rajasthan v. Jagraj Singh* (2019)¹⁰, The Supreme Court reaffirmed the significance of promptly resolving cases, claiming that postponements in criminal procedures harm the accused and undermine public trust in the legal system. This case made clear that ongoing court system reforms are necessary to guarantee that justice is served promptly. As noted by S.Lakshmi Priya and S.Lakshmi Priya. (2024)¹¹, the case demonstrated the Court's commitment to upholding the right to a speedy trial, even when faced with systemic challenges.

⁷ Meena, Khoda. (2024). CONSTITUTIONAL RIGHT TO SPEEDY TRIAL FOR SAFEGUARDING WOMEN: AN ANALYSIS IN PERSPECTIVE TO RAPE VICTIMS IN INDIA. 83. 154-163.

⁸ Kaur, Pawandeep. (2024). Writs and Rights: A Comprehensive Study of Judicial Remedies in India. Legal Research Development. 8. 71-81. 10.53724/lrd/v8n4.7.

⁹ *Maneka Gandhi v. Union of India*, AIR 1978 SC 597.

¹⁰ *State of Rajasthan v. Jagraj Singh*, (2019) 6 SCC 497.

¹¹ S.Lakshmi Priya, S.Lakshmi Priya. (2024). A Critical Analysis on Constitutional Remedies in Administrative Actions in India.. International Journal of Advances in Engineering and Management. 6. 283-287. 10.35629/5252-0611283287.



In *Bihar Legal Support Society v. Chief Secretary, Bihar* (1986)¹², The Supreme Court upheld the notion that criminal trial delays infringe upon the accused's fundamental rights guaranteed by Article 21. The case notably addressed the issue of undertrials who had been held for unreasonably lengthy lengths of time, highlighting the need for the legal system to uphold their right to a timely trial. The Court mandated a thorough examination of undertrial cases to make sure protracted delays were not violating their constitutional rights. This case strengthened the court's position that the accused's right to a quick trial is a substantive right rather than just a procedural one.

Another key case is *Shriman N. P. Thakur v. Union of India* (2017)¹³, whereby the Supreme Court addressed the problem of delays brought on by ineffective procedures. The Court recognized that an accused person's right to a prompt trial is negatively impacted by systematic delays in the legal system. The decision emphasized the need for procedural and infrastructure reforms to address the inefficiencies causing delays and recommended for more steps to speed up case settlement. The Thakur ruling reaffirmed how crucial it is to establish a prompt trial procedure in order to guarantee that justice is administered without excessive delay. As a result, the legal system that oversees India's right to a quick trial is based on both important statutes and constitutional provisions, and judicial interpretation makes sure that this right is upheld. The judiciary's attempts to resolve delays and advance judicial efficiency through seminal case law are indicative of the changing perception of this fundamental right.

3. Judicial Efficiency vs. Fair Trial

Any legal system's operation depends heavily on the ideas of judicial efficiency and fairness, especially when it comes to making sure that justice is administered promptly and fairly. The ability of the legal system to handle matters in a timely and efficient manner is known as judicial efficiency. It means cutting down on the backlog of cases, decreasing delays, and making sure that court cases are resolved quickly. A more efficient judiciary leads to quicker decisions, reduced pendency, and less strain on the system, ultimately fostering public confidence in the ability of courts to provide timely justice¹⁴. Efficiency is crucial in a country like India, where millions of cases are pending in courts, and delays in trials have become a significant concern for the judicial system¹⁵.

Fairness, on the other hand, is a basic idea that guarantees unbiased proceedings and provides each party with a chance to state their case. It entails following due process, making sure the accused's rights are upheld, assessing the evidence appropriately, and conducting judicial proceedings in an open and honest manner. Fairness is essential in maintaining the integrity of the judicial system, guaranteeing that justice is not only done but also seen to be done¹⁶. It protects people's rights and shields them against arbitrary or biased outcomes by preventing snap decisions or judgments made without a thorough analysis of the facts.

However, striking a balance between judicial efficiency and impartiality is a difficult task. One of the main problems is that accelerating trials frequently results in lower-quality justice. Courts may be tempted to ignore the nuances of particular instances when they are under pressure to make decisions quickly, which could result in hasty rulings. This is especially true in a system burdened with a high case backlog, where the focus may shift from thorough deliberation to merely clearing the docket¹⁷. Additionally, the resource constraints faced by many courts, such as insufficient number of judges and

¹² *Bihar Legal Support Society v. Chief Secretary, Bihar*, (1986) 4 SCC 664

¹³ *Shriman N. P. Thakur v. Union of India*, (2017) 8 SCC 479.

¹⁴ Nagar, Anita. (2024). Judicial Reforms and the Role of the Bar: Ensuring Access to Quality Legal Representation. *Indian Journal of Law*. 2. 44-50. 10.36676/ijl.v2.i5.57.

¹⁵ Singh, Tanushree & Thakur, Akash. (2019). Administration of Justice: Judicial Delays in India. *Indian Journal of Public Administration*. 65. 001955611987345. 10.1177/0019556119873451.

¹⁶ Александров, Александр & Александрова, Ирина. (2022). JUDICIAL PROCESS – SOURCE OF LAW AND JUSTICE. The rule-of-law state: theory and practice. 18. 11-29. 10.33184/pravgos-2022.1.1.

¹⁷ Malik, Dr. Neeraj. (2024). WITNESS RELIABILITY IN CRIMINAL TRIALS. *ShodhKosh: Journal of Visual and Performing Arts*. 5. 10.29121/shodhkosh.v5.i7.2024.2279.



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inadequate infrastructure, further exacerbate the tension between efficiency and fairness¹⁸. Moreover, the increasing reliance on technological solutions, such as virtual courts and AI-based case management, can sometimes fail to account for nuances that require human judgment, leading to potential errors or overlooked fairness concerns¹⁹.

There might be dire repercussions if judicial justice or efficiency are neglected. The rights of the accused, such as the right to a fair trial, the right to be heard, and the right to legal representation, may be violated when efficiency takes precedence over justice. As noted by²⁰ a hasty trial that bypasses essential legal safeguards could result in wrongful convictions, undermining public trust in the justice system. On the other hand, when fairness is overly emphasized at the expense of efficiency, the judicial system may become bogged down with delays, leading to prolonged pretrial detention, particularly in cases involving vulnerable individuals who cannot afford lengthy legal battles²¹. This reinforces the unfairness that the rule of law is meant to correct in addition to undermining it. In severe situations, a lack of prompt justice could give criminals a sense of impunity, which could erode the legal system's deterrent power and erode public trust in judicial institutions. As a result, judicial systems must carefully balance judicial justice and efficiency. Achieving this balance necessitates extensive changes to the way resources are distributed, legal processes, and technology are used, all the while making sure that people's fundamental rights are never sacrificed for convenience. Upholding the rule of law, facilitating access to justice, and guaranteeing that the rights of all parties are safeguarded during the legal process all depend on an impartial and effective judicial system.

4. Impact of Delayed Trials

Delays in court cases can seriously compromise the fundamentals of justice and have far-reaching social and legal repercussions. The severe psychological and financial toll that postponed trials have on the accused, victims, and their families is among the most obvious social repercussions. Prolonged court cases frequently cause the accused to experience anxiety, uncertainty, and a disturbed existence. Prolonged detention, especially for undertrials who are kept in jail without conviction, leads to severe emotional and financial stress, as they are deprived of their liberty and livelihood.²² Declare that the accused are frequently detained in inhumane conditions that infringe upon their fundamental rights, causing the "erosion of human dignity" as a result. Additionally, because the drawn-out judicial process frequently stresses their financial and mental well-being, the accused's family may experience financial hardship and social humiliation.

Crime victims may feel frustrated and powerless as a result of delays in justice. When the procedure takes years, victims may feel that the legal system has let them down. Trial delays can impede the healing process and increase the pain of victims and their families in cases involving heinous crimes like murder or sexual assault. Due to lengthy trials that require them to relive painful events, victims frequently undergo a "re-victimization" as a result of prolonged legal proceedings. Delays in justice can also keep victims from receiving the restitution or closure they deserve, which eventually erodes trust in the legal system's capacity to provide equitable results.

Legally speaking, delays cause the judicial system to malfunction, which results in a backlog of cases and a diluted administration of justice. International human rights legislation guarantees the right to a fair and prompt trial; trial delays may be viewed as a breach of this right, undermining the rule of law. As pointed out by²³ when trials are delayed, it may result in witnesses' testimonies becoming unreliable due to the passage of time, or evidence being lost or compromised. Delays can also promote a culture of impunity, in which criminals can take advantage of procedural flaws to avoid

¹⁸ Manda, Vijaya Kittu. (2022). Corporate Governance in India: A 2021 Literature Review. 10.17605/OSF.IO/MDQKP.

¹⁹ Zalnieriute, Monika & Bell, Felicity. (2020). Technology and the Judicial Role. 10.2139/ssrn.3492868.

²⁰ Gopal, G.. (2024). Evaluating the Impact of Judicial Reforms on Access to Justice in India. Indian Journal of Law. 2. 32-37. 10.36676/ijl.v2.i5.55.

²¹ Muralidhar, S.. (2022). Appearing in Court in India: Challenges in Representing the Marginalised. CASTE / A Global Journal on Social Exclusion. 3. 421-441. 10.26812/caste.v3i2.452.

²² Takwani, C. K., & Takwani, M. (2015). *Criminal Procedure* (4th ed.). Eastern Book Company.

²³ Sharma, S. N. (n.d.). *Inordinate Delay Versus Speedy Trial: An Indian Experience*. Department of Laws, H.P. University, Shimla.



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punishment. Because they might not be held responsible for their conduct, criminals are sometimes acquitted only because time has passed.

The decline in public confidence in the judiciary is one of the most harmful effects of postponed trials. When the public perceives the judicial system as slow and inefficient, it fosters skepticism about the fairness and effectiveness of the legal process.²⁴ Make the case that protracted delays erode confidence in the system's capacity to provide justice by giving the impression that the courts are ineffectual. A growing disenchantment with the legal system may result from the public's sense that justice is being denied when it is delayed. In a democratic society where the judiciary is supposed to be an unbiased arbiter and defender of rights, this loss of faith is particularly troublesome.

Furthermore, delays in the legal system that are accompanied by a lack of responsibility for those delays erode institutional trust even more. People begin to perceive that the judicial system is failing them, leading to diminished respect for legal authority and potential undermining of the rule of law itself.²⁵ Argue that this erosion of trust also hampers the ability of law enforcement and judicial institutions to effectively deter crime, as the threat of legal consequences loses its potency in the eyes of the public.

5. Judicial Reforms

In order to solve the ongoing issue of trial delays, India's legal system has undergone significant reforms in recent years. One of the main projects in this area has been the construction of fast-track courts. These courts were set up to expedite the resolution of cases, particularly those involving heinous crimes like corruption, sexual assault, and murder. To reduce the burden on traditional courts, fast-track courts give priority to specific case types that require prompt attention. For some types of cases, fast-track courts have been successful in expediting the trial process, guaranteeing that justice is served without needless delays (Soni and Kumar, 2021). These courts' reach is still constrained, though, and they are frequently criticized for their excessive reliance on meager funding and a shortage of judges, which reduces their overall effectiveness.

The growing use of alternative dispute resolution (ADR) procedures has been another significant innovation. ADR gives parties a chance to settle their disagreements outside of the conventional courts by utilizing techniques including mediation, arbitration, and conciliation. This approach is particularly useful for civil disputes, family law cases, and commercial matters, where time-consuming litigation can be avoided.²⁶ Highlights that ADR not only helps to lower the burden in courts but also offers a more accessible and less confrontational approach of settling conflicts. ADR has grown in favor with the help of the government and judiciary, and several state governments have made it essential for specific case types. Notwithstanding its achievements, obstacles like a shortage of qualified experts and a general resistance to ADR adoption in some areas continue to exist, restricting its full potential.

In recent years, the use of technology has also played a crucial part in judicial changes aimed at minimizing delays. The introduction of e-courts is one such technological advancement that has transformed the way legal proceedings are conducted. E-courts allow for virtual hearings, digital filing of documents, and remote access to case files, all of which can significantly reduce the time spent on administrative tasks.²⁷ By decreasing physical paperwork and enhancing transparency, the Indian government's e-court project has increased the judiciary's efficiency. Furthermore, by automating repetitive processes like case scheduling, document sorting, and legal research, the incorporation of artificial intelligence (AI) into case management systems has further accelerated proceedings. AI-powered tools can also help courts make data-

²⁴ Basu, D. D. (2008). *Commentary on the Constitution of India* (8th ed.). Prentice Hall.

²⁵ "Juyal, Rebant. (2024). Indian Constitution and the Rule of Law: Analysing the Exercise of Judicial Review by the Indian Supreme Court to Enforce Rule of Law in the Alok Verma Case. 42. 301-318".

²⁶ Bharad, Bhavesh & Pandya, Sandeepkumar. (2024). THE EVOLUTION OF JUSTICE: ASSESSING THE EFFECTIVENESS AND ITS ACCEPTANCE OF ALTERNATIVE DISPUTE RESOLUTION SYSTEM IN INDIA. CV. 99-106.

²⁷ Bose, Ranit. (2024). ARTIFICIAL INTELLIGENCE AND INDIAN JUDICIAL SYSTEM: A CRITICAL ANALYSIS IN PERSPECTIVES OF SPEEDY TRIAL. 10.58532/nbennurdch10.



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driven decisions, forecast case outcomes, and spot trends in case law. These technologies are still in their infancy, though, and obstacles including a lack of infrastructure, a lack of digital literacy, and cybersecurity issues will prevent their widespread adoption.

Another important reform intended to lessen the strain on the legal system and speed up case settlement is plea bargaining, which was made possible by the Criminal Law (Amendment) Act of 2005. Plea bargaining allows an accused person to plead guilty to a lesser offense in exchange for a reduced sentence, thereby shortening the length of trials.²⁸ Plea negotiating is a useful tactic for clearing the judicial system and guaranteeing speedier verdicts in situations when there is substantial evidence against the accused. By cutting down on the time and money required for drawn-out trials, it helps the accused as well as the legal system. Nonetheless, detractors contend that plea bargaining occasionally results in unfair outcomes, especially when it comes to instances involving vulnerable populations, where people may be pressured to accept plea agreements out of fear of more severe punishments or a lack of available legal counsel.

To alleviate the judicial system's inefficiencies and delays, a number of legislative initiatives have been proposed in addition to these improvements. Better case tracking, real-time data on case pending, and assistance with court resource management have all been made possible by the creation of the National court Data Grid (NJDG). In an effort to decrease the number of inmates awaiting trial, the Code of Criminal Procedure (CrPC) has also been revised to include provisions like Section 436A, which requires the release of undertrials who have been detained for more than half the maximum penalty for their offense.

6. Key Case Law

The understanding and upholding of the right to a speedy trial have been significantly impacted by the Indian judiciary's landmark rulings. The right to a speedy trial has long been recognized as an essential part of the right to life and personal liberty, as stated in Article 21 of the Indian Constitution. One of the first and most significant rulings in this regard is the *Hussainara Khatoon v. State of Bihar* case from 1979. In this case, the Supreme Court emphasized that an accused person's prolonged detention without trial infringed their constitutional right to personal liberty, which is protected under Article 21. This case involved a number of undertrials who had been held for years without a fair trial. The Supreme Court's decision led to a broader interpretation of the right to a speedy trial, ensuring that individuals would not be unjustly held for extended periods of time without their cases being heard (*Hussainara Khatoon v. State of Bihar*, 1979). The ruling set the stage for demonstrating that the accused's fundamental rights were directly violated by criminal trial delays. Another key case, *State of Maharashtra v. Rajeev S. Khanna* (1989)²⁹, reinforced the Supreme Court's commitment to the right to a speedy trial. In this instance, the Court recognized that excessive delays in criminal trials are a violation of both the accused's rights and the legal process's fairness concept. The State has a duty to guarantee that proceedings were held without needless delays, the Court explained. *Khanna* underlined that although structural inefficiencies frequently caused judicial delays, the state was ultimately in charge of defending the constitutional right to a prompt trial. According to *State of Maharashtra v. Rajeev S. Khanna* (1989), this case demonstrated the connection between delays and the decline in the standard of justice provided, especially when cases drag on for years.

Furthermore, the interpretation of the right to a quick trial has been significantly impacted by the *Maneka Gandhi v. Union of India* (1978) case, even though it primarily addressed the larger scope of personal liberty. By holding that every process that impacts a person's personal freedom must be not only lawful but also fair, just, and reasonable, the Supreme Court broadened the application of Article 21 in the *Maneka Gandhi* case. The case established a precedent for subsequent rulings in which the Court stressed that the procedures pertaining to the deprivation of liberty, such as the length of trials, must be consistent with natural justice principles (*Maneka Gandhi v. Union of India*, 1978). The idea that judicial delays that lead to an unfair trial or extended incarceration cannot be justified was established by this ruling. Addressing the problem of

²⁸ Husin, Nabilla & Husin, Naylla. (2024). Plea Bargaining as a Reform in Criminal Procedure Law: An Analysis of Article 199 of the Draft Criminal Procedure Code. *Ius Poenale*. 5. 31-42. 10.25041/ip.v5i1.3486.

²⁹ *State of Maharashtra v. Rajeev S. Khanna*, (1989) 2 SCC 201.



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delayed trials in India has also been made possible in large part by Public Interest Litigations (PILs). PILs are an important legal tool that have allowed activists, public interest groups, and even regular people to draw attention to systemic problems in the legal system, such as trial delays. In *Ravindra Kumar Pandey v. Union of India* (2001)³⁰, a PIL was filed addressing the acute delay in the criminal justice system. In response, the Court directed the government to act right away to clear the backlog of cases and boost the legal system's effectiveness. As demonstrated by *Ravindra Kumar Pandey* and other instances of a similar nature, PILs have proven to be an effective tool for pressuring the government and judiciary to enact reforms (*Ravindra Kumar Pandey v. Union of India*, 2001).

Additionally, in *Datar Associates v. State of Maharashtra* (2005)³¹, To draw attention to the problem of undertrials who had been detained for long periods of time because of judicial delays, a PIL was filed. The Supreme Court made aggressive measures to alleviate the situation of undertrials while also acknowledging the fundamental problems in the legal system. The Court emphasized the need for speedy trials and the release of people who had previously been detained for long periods of time without a trial by ordering that undertrials who had been held in custody for longer than the maximum penalty for their alleged offenses be allowed bail. This case was crucial in preventing unjustified deprivations of liberty due to trial delays (*Datar Associates v. State of Maharashtra*, 2005). PILs' participation in these cases is indicative of civil society's expanding role in keeping the government responsible for the prompt and equitable administration of justice. PILs are a potent tool for judicial activism, promoting changes in sectors where systemic inefficiencies and drawn-out trials have resulted from the state's inaction. The courts have promoted wider societal reforms in addition to ensuring justice for individual litigants by using PILs to alleviate delays in the legal process.

7. Challenges and Obstacles

The Indian legal system still faces several obstacles in upholding the right to a fast trial, even with the notable advancements made through judicial reforms. These challenges are caused by a combination of systemic problems, resource limitations, and cultural norms that significantly impede the effectiveness of the legal system and the prompt administration of justice. The overworked judiciary is one of the most enduring problems. Millions of cases are still seeking decision in Indian courts, a number that has been rising continuously. There were around 3.5 crore (35 million) lawsuits pending in Indian courts as of 2021, placing a tremendous burden on the judiciary's resources. Since criminal courts handle a large number of cases involving undertrials who are frequently detained for extended periods of time, the backlog of cases is especially severe there. Trial delays result from the overwhelming number of cases, which strains the infrastructure and human resources already in place.

A further noteworthy obstacle is the dearth of judges in India. With one judge for every 50,000 people, India has one of the lowest judge-to-population ratios in the world. Due to the legal system's incapacity to handle matters promptly, cases are frequently postponed as a result of this judge deficit. In addition, a lot of judges have a lot of cases to handle, which limits the amount of time they can spend on each one. This makes the trial process backlogged and makes delays even worse. Another significant barrier is the absence of judicial infrastructure. Many courts, particularly those in rural areas, are housed in antiquated buildings with little access to contemporary technology. The trial process is slowed down by inadequate infrastructure, such as electronic file systems, case management tools, and enough courtrooms. The intricacy of legal processes is another significant obstacle to accelerating trials. The intricate and frequently onerous collection of procedures that form the foundation of the Indian legal system, especially in the area of criminal law, can cause needless delays. The backlog is exacerbated by procedural requirements like drawn-out investigations, witness production delays, and the sluggish filing and retrieval of case-related documents.

Furthermore, the judiciary's own procedural and cultural inertia is a major barrier to reform. The adoption of newer techniques like electronic filing, online hearings, and AI-based case management systems has been hampered by resistance to change among some members of the legal profession, including judges, attorneys, and court employees. Despite the

³⁰ *Ravindra Kumar Pandey v. Union of India*, (2001) 10 SCC 500.

³¹ *Datar Associates v. State of Maharashtra*, (2005) 3 SCC 705.



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availability of more effective tools, there is nonetheless a propensity to rely on conventional case management techniques. Lastly, administrative and political obstacles frequently prevent improvements from being implemented. There are frequently delays in the distribution of funds, the construction of the required infrastructure, and the enactment of legislation required to remedy judicial inefficiencies. Political factors can occasionally cause judicial nominations to be delayed or impede the timely establishment of fast-track courts. There are still a number of issues, even though the Indian legal system has made great progress in streamlining the trial process and cutting down on delays. Trial delays exist due to a number of factors, including the overworked system, a shortage of judges, outdated infrastructure, complicated legal processes, political obstacles, and resistance to reform. A multifaceted strategy is needed to overcome these challenges, including more judge appointments, improved infrastructure, streamlined processes, and a move toward embracing technological advancements that can expedite the legal system.

8. Conclusion

One crucial protection of the legal system is the right to a timely trial, which guarantees that people will not be subjected to drawn-out court cases that infringe upon their right to personal freedom. Notwithstanding constitutional protections, India's judicial system nevertheless has a difficult time striking a balance between the basic demand for justice and the necessity for judicial efficiency. Trial delays not only hurt the accused but also undermine public confidence in the legal system, interfere with the legal process, and disproportionately hurt the weaker members of society. Through changes including the creation of fast-track courts, alternative conflict resolution procedures, and technology advancements, the Indian legal system has made progress in tackling these issues. But progress is still hampered by the overworked system, a shortage of judges, and inadequate infrastructure. Without compromising the fairness of the legal system, new technological integration and a more effective approach to the legal system could cut down on delays and boost productivity. Going forward, a concerted effort is required to increase the number of judge appointments, invest in cutting-edge facilities, and implement comprehensive procedural reforms in order to strike a balance between efficiency and equity. The right to a quick trial can only be fully achieved by putting such changes into place, which will ensure that justice is served to all parties in a prompt, impartial, and respectable manner.