

ZERO FIR: A TOOL TOWARDS SPEEDY JUSTICE

- Ms. Bijaya Das*

Abstract

Zero FIR represents a paradigm shift in India's criminal justice framework, addressing a long-standing structural impediment to victim access and investigative efficiency. By allowing any police station to register an First Information Report (FIR) irrespective of territorial jurisdiction, this mechanism eliminates bureaucratic delays and removes gatekeeping obstacles that historically prevented victims—particularly women and vulnerable groups—from initiating complaints. Introduced through the Justice Verma Committee's recommendations following the 2012 Nirbhaya case and now statutorily mandated under Section 173 of the Bharatiya Nagarik Suraksha Sanhita (BNSS) 2023, Zero FIR has evolved from a judicial innovation into a formal legal framework. Yet its implementation remains fragmented by awareness gaps, training deficiencies, and coordination challenges that compromise its victim-centric promise. This report examines Zero FIR's legal architecture, institutional impact, and practical limitations while assessing its efficacy as a tool for accelerating access to justice.

Keywords: First Information Report(FIR), Justice, Bharatiya Nagarik Suraksha Sanhita(BNSS), Bharatiya Nyaya Sanhita(BNS), Territorial Jurisdiction, Station House Officer(SHO)

INTRODUCTION

Zero FIR (First Information Report) is a mechanism in India that allows the lodging of an FIR at any police station irrespective of the jurisdiction where the crime actually occurred. This tool is particularly aimed at enabling speedy justice by overcoming the territorial limitations that traditionally delay police intervention and investigation processes.

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The concept of Zero FIR emerged from a structural vulnerability in India's criminal procedure. Under the traditional framework, victims were required to file complaints at the police station possessing territorial jurisdiction over the offense location; a requirement that created perverse incentives for jurisdictional refusals and systematic delays, particularly in mobile or inter-state crimes. The 2012 Nirbhaya gang rape case exposed this weakness when police refused to register an FIR due to jurisdictional ambiguities, a delay that nearly obliterated investigative opportunities. The Justice Verma Committee, convened in response to public outrage, identified this procedural obstruction as fundamentally inconsistent with constitutional rights to life and personal liberty under Article 21 of the Constitution.¹

The Committee's 2013 recommendation was incorporated into the Criminal Law (Amendment) Act, 2013, which modified Section 154 of the Criminal Procedure Code to permit FIR registration at any police station. However, this reform rested on judicial precedent rather than explicit statutory language. The Supreme Court of India formalized this principle in *Lalita Kumari v. Govt. of U.P.* (2014), ruling that registration of an FIR is mandatory whenever information discloses a cognizable offense, regardless of territorial jurisdiction. The Court held that preliminary inquiries cannot precede FIR registration for serious crimes; a watershed judgment that transformed Zero FIR from a procedural practice into a constitutional imperative.²

With the enactment of the BNSS 2023, effective July 1, 2024, Zero FIR achieved full statutory recognition. Section 173(1) of the BNSS now explicitly provides that "every information relating to the commission of a cognizable offence, irrespective of the area where the offence is committed, may be given orally or by electronic communication" to any police station. This codification represents institutional acknowledgment that jurisdictional technicalities cannot trump victim access to the justice system.³

Zero FIR is a **victim-centric reform** allowing prompt reporting at any station, which must then

¹<https://blog.finology.in/Legal-news/Provision-of-Zero-FIR-E-FIR-under-BNSS>.

²<https://www.drishtijudiciary.com/to-the-point/bharatiya-nagarik-suraksha-sanhita-&-code-of-criminal-procedure/zero-fir-under-bharatiya-nagarik-suraksha-sanhita-2023-bnss>.

³<https://www.ijfmr.com/papers/2025/5/56740.pdf>.

transfer the case to the competent jurisdiction.⁴⁵⁶ It responds to chronic problems of refusal, delay, and jurisdictional objections at the FIR stage, long recognised as barriers to justice in India and Pakistan.⁷⁸

Thus, Zero FIR lets victims register an FIR at **any police station irrespective of jurisdiction**, aiming to remove early procedural hurdles and speed up the path to justice. Recent reforms under the **BNSS, 2023** embed Zero FIR and e-FIR in a broader push for time-bound, tech-enabled criminal justice.

OBJECTIVE OF THE STUDY:

1. To examine the concept and legal framework of Zero FIR in India with reference to statutory provisions and judicial pronouncements.
2. To analyze the effectiveness of Zero FIR in overcoming procedural barriers in the registration of First Information Reports.
3. To assess the role of Zero FIR in promoting victim-centric and speedy justice, particularly for marginalized and vulnerable sections of society.
4. To identify the practical challenges and limitations faced by law enforcement agencies in the implementation of Zero FIR
5. To suggest measures and reforms for strengthening the effective enforcement of Zero FIR to ensure timely access to justice.

RESEARCH METHODOLOGY:

The present study is descriptive in nature and data were collected from previous articles, journals, and various websites through secondary sources.

⁴T., T, V., Balamurugan, H., & R, S. (2025). A Comprehensive Analysis Of Zero Fir And Human Rights Obstacles And Possibilities In Obtaining Justice. *International Journal For Multidisciplinary Research*.<https://doi.org/10.36948/ijfmr.2025.v07i05.56740>

⁵Pandey, P. (2020). Zero First Information Report: Indian Laws and Practices. *Law Enforcement eJournal*.<https://doi.org/10.2139/ssrn.3567857>

⁶Kowshikaa, A. (2024). India's Criminal Justice Reform: An In-Depth Look at The New Laws. *Journal of Law and Legal Research Development*.<https://doi.org/10.69662/jllrd.v2i1.35>

⁷Singh, S., & Kaur, R. (2025). Role of First Information Report (FIR) in The Justice Delivery System. *International Journal For Multidisciplinary Research*.<https://doi.org/10.36948/ijfmr.2025.v07i06.60300>

⁸Dalmia, A. (2023). THE IMPACT OF PENDING COURT CASES ON THE EFFICACY OF THE JUDICIAL SYSTEM IN INDIA: “JUSTICE DELAYED IS JUSTICE DENIED”. *International Journal of Social Science and Economic Research*.<https://doi.org/10.46609/ijsser.2023.v08i10.005>

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REVIEW OF LITERATURE

T., T, V., Balamurugan et al. (2025) says that Zero FIR can potentially improve access to justice for crime victims by accelerating FIR filing, shortening investigations, and increasing police accountability, but obstacles like awareness, infrastructure, and training need to be addressed for full benefits.

According to *Pandey, P. (2020)*; Zero FIR allows individuals to report crimes without involving police, enhancing the rule of law and promoting public safety.

Singh, S. et al. (2025) while studying the Effectiveness and challenges of the FIR system finds that the FIR system is essential for justice but faces challenges like delays, refusals, and misuse.

Khan, S. et al. (2025) observes that Non-registration of First Information Reports in Pakistan negatively impacts victim rights, case outcomes, and public confidence, suggesting the need for improved police training, infrastructure, and community involvement.

Khan, M. et al. (2025) examines that JurisAI, an AI-based app, improves First Information Report (FIR) preparation in India by reducing errors and speeding up case registration, enhancing the justice delivery process.

Sahu, S. (2025) observes that BNSS 2023 introduced time-bound investigations and digital FIRs to speed up justice delivery.

Ravindra, D. et al.. (2025) examines that E-justice in India has the potential to improve transparency and accountability in the judicial system, but requires a gradual transition towards new techno-cultural methods.

Kowshikaa, A. (2024) explores that India's criminal justice reforms include gender-neutral language, mandatory forensic investigations, community service, extended police custody, and advanced technology, but also face potential gaps and challenges.

Gopal, M. (2024) says that Judicial reforms in India have significantly improved access to justice, addressing issues like delayed justice, judicial inefficiency, and lack of accessibility.

Kumar, R. (2025) examines that this advanced automated FIR system streamlines the filing of complaints, enhancing clarity, effectiveness, and public engagement in criminal investigations.

Dixit, S. et al. (2025) observes that AI adoption in India's judiciary and law enforcement systems can improve efficiency, accessibility, and decision-making, leading to faster and fairer access to justice.

Mathis, B. et al. (2025) finds that IT investment contributed to shorter court delays alongside other factors.

Chandel, J. et al. (2025) says that Legal reforms and court rulings improved protections against online violence, but enforcement remains weak.

Dalmia, A. (2023) finds that the high number of pending court cases in India negatively impacts the rule of law and the right to access justice, necessitating government action to reduce case pending times.

Sowjanya, D., et al. (2025) observes that The Integrated Online FIR & CSR Management Application (IFC-MA) significantly reduces FIR registration time and increases CSR issuance for non-cognisable offences, while maintaining evidentiary integrity and regulatory compliance.

DISCUSSION ON THE TOPIC:

Operational Framework and Procedural Architecture:

The Zero FIR mechanism functions through a streamlined seven-step process designed to maximize speed while maintaining procedural integrity⁹:

- I. **Registration Phase:** When a complainant approaches any police station with information about a cognizable offense occurring outside that station's territorial jurisdiction, the Station House Officer (SHO) or duty officer must record the complaint without invoking jurisdictional grounds as a basis for refusal. The information may be provided orally (to be reduced to writing and read back to the informant) or via electronic communication (with mandatory sign-off within three days as per Section 173(1) of BNSS).¹⁰
- II. **Preliminary Safeguards:** For cognizable offenses punishable by three to seven years imprisonment, Section 173(3) of BNSS permits the SHO with Deputy Superintendent of Police approval; to conduct a preliminary inquiry within 14 days to establish *prima facie* case existence. This represents a measured exception to the *Lalita Kumari* principle, balancing victim protection against frivolous complaints.¹¹

⁹https://bprd.nic.in/uploads/pdf/SOP_on_Zero_FIR%20&%20eFIR%20-%20NCL%202023.pdf.

¹⁰<https://blog.finology.in/Legal-news/Provision-of-Zero-FIR-E-FIR-under-BNSS>.

¹¹ Ibid

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III. **Documentation and Transfer:** The Zero FIR is registered with the serial number "0" to signify jurisdictional transfer, and a free copy is provided immediately to the informant or victim under Section 173(2) of BNSS. Initial evidence preservation measures (such as medical examinations in sexual assault cases) may occur at the registering station before formal transfer.¹²

IV. **Jurisdictional Handover:** The Zero FIR is transmitted to the police station possessing territorial jurisdiction over the offense location, which re-registers it as a regular FIR with its own serial number. The renumbering ensures full integration into the investigating station's records and removes any procedural stigma associated with the "zero" designation¹³

V. **Investigation Commencement:** An Investigating Officer is assigned by the receiving station's SHO, and investigation proceeds under standard BNSS protocols. The transferred Zero FIR carries identical legal value to a regular FIR for all evidentiary and procedural purposes.¹⁴

A critical 2025 Delhi High Court judgment in *X v. State (NCT of Delhi)* refined this framework by clarifying that Zero FIR should not serve as a procedural default when territorial jurisdiction is demonstrable at registration. The Court noted that unnecessary registration as a Zero FIR delays investigation and risks compromising evidence integrity, suggesting that where jurisdiction is apparent, regular FIR registration is procedurally preferable.

This judgment introduces an important nuance that is the "Zero FIR's purpose is to facilitate registration when jurisdiction is ambiguous or contested, not to provide an alternative filing mechanism when proper jurisdiction exists."¹⁵

Institutional Safeguards and Accountability Mechanisms:

Indian law imposes stringent obligations on police for Zero FIR compliance, with explicit penalties for non-compliance. Section 199(c) of the Bharatiya Nyaya Sanhita (BNS) provides

¹²https://bprd.nic.in/uploads/pdf/SOP_on_Zero_FIR%20&%20eFIR%20-%20NCL%202023.pdf.

¹³https://bprd.nic.in/uploads/pdf/SOP_on_Zero_FIR%20&%20eFIR%20-%20NCL%202023.pdf.

¹⁴<https://www.gktoday.in/zero-fir/>.

¹⁵<https://www.scconline.com/blog/post/2025/05/12/dhc-directs-registration-of-regular-fir-instead-of-zero-fir-as-offence-occurred-within-jurisdiction/>.

that a public servant who "fails to record any information given to him under sub-section (1) of section 173 of BNSS in relation to cognizable offence" faces imprisonment of not less than six months but extending to two years with fine. This represents a substantial elevation from prior practice, where enforcement relied primarily on judicial remedies.¹⁶

For aggrieved citizens, Section 173(4) of BNSS establishes a hierarchical grievance mechanism which includes; if a police officer refuses to register a Zero FIR, the complainant may submit written notice to the Superintendent of Police, who must then either investigate personally or direct a subordinate officer to do so. Failure at this stage permits recourse to the Magistrate under Section 156(3), who possesses authority to direct FIR registration.¹⁷

High Courts have reinforced these protections through proactive supervision. The Karnataka High Court, in PIL No. 30666/2019, issued binding directives requiring all police stations to file Zero FIRs without jurisdictional objections and explicitly cautioning officers that refusal constitutes criminal conduct under Section 166A of the IPC. Similarly, the Delhi High Court in *Kirti Vashisht v. State & Ors.* (2019) mandated Zero FIR compliance and prompted police departmental circulars to operationalize the requirement.¹⁸

Impact on Gender Justice and Vulnerable Populations:

Zero FIR's most consequential application lies in gender-justice contexts, where delays in FIR registration correlate with evidentiary loss, victim trauma, and investigative compromise. India records approximately 93 rape cases daily, a scale of sexual violence rendering jurisdictional delays intolerable.¹⁹

The mechanism's victim-centric architecture addresses multiple systemic barriers. First, it eliminates the need for victims to locate the "correct" police station—a requirement that often constitutes a second victimization, particularly for women in distress or facing threats. Second, it prevents the practice of jurisdictional deferral, whereby police would deflect complaints to other

¹⁶<https://www.ijfmr.com/papers/2025/5/56740.pdf>.

¹⁷<https://www.linkedin.com/pulse/what-can-i-do-police-refuse-register-fir-joginder-singh-rohilla-pp8sf>.

¹⁸ Ibid

¹⁹<https://journal.indianlegalsolution.com/2021/01/15/womens-rights-in-india-a-detailed-study-with-special-focus-on-the-concept-of-zero-fir-natalasha-gandhi-yashwant-yadav/>.

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stations, effectively creating a zone of investigative inaction. Third, it enables immediate evidence preservation through medical examinations and forensic collection at the initial reporting station before formal transfer.²⁰

The Disha rape and murder case (Telangana, 2019) exemplified this utility: police initially refused to register an FIR due to jurisdictional contention, sparking public outcry and investigative delay. Had Zero FIR been invoked promptly, initial evidence collection could have proceeded uninterrupted. Similarly, the Kathua rape case (2018) demonstrated how jurisdictional disputes prolonged victim suffering and delayed investigation commencement.²¹

BNSS 2023 strengthened protections for women and marginalized victims by mandating that complaints in sexual assault cases be recorded by female police officers or, for victims with disabilities, at the victim's chosen location with appropriate interpreters, and be videographed for subsequent magistrate recording per Section 173. These provisions reflect institutional recognition that procedural accessibility directly enables victim participation in justice.²²

E-Zero FIR: Digital Acceleration and Cybercrime Integration:

The Government of India's May 2025 e-Zero FIR initiative represents a technological leap in Zero FIR operationalization. Launched as a pilot in Delhi through the Ministry of Home Affairs' Indian Cybercrime Coordination Centre (I4C), the initiative automatically converts cyber financial crime complaints above Rs 10 lakh filed via the National Cybercrime Reporting Portal (NCRP) or Helpline 1930 into Zero FIRs. Complainants must visit the concerned police station within three days to convert the e-Zero FIR into a regular FIR, integrating I4C's NCRP system, Delhi Police's e-FIR platform, and the NCRB's Crime and Criminal Tracking Network & Systems (CCTNS).²³

This integration eliminates geographic constraints and administrative burden, allowing victims to file complaints remotely and initiating investigative procedures without requiring physical

²⁰<https://www.gktoday.in/zero-fir/>.

²¹ Ibid

²²https://bprd.nic.in/uploads/pdf/SOP_on_Zero_FIR%20eFIR%20NCL%202023.pdf.

²³<https://www.pib.gov.in/PressReleasePage.aspx?PRID=2129715>.

station visits. Union Home Minister Amit Shah explicitly framed the e-Zero FIR as a mechanism for "unprecedented speed" in apprehending cybercriminals. The system's integration with CCTNS, which now connects over 17,000 police stations nationally as of January 2025, creates a unified investigative infrastructure previously absent.²⁴

Zero FIR, e-FIR and Tech Tools

| Reform/Tool | Intended effect on speed | Notes | Citations |
|-----------------------|---------------------------------|--|--|
| Zero FIR | Immediate registration anywhere | Cuts jurisdiction disputes, early law-in-motion | (Thanushiya Devi et al., 2025; Pandey, 2020; Sahu, 2025; Kowshikaa, 2024; Chandel & Sethi, 2025) |
| e-FIR / online FIR | Remote, 24x7 complaint filing | Shown to cut registration time and increase access | (Sahu, 2025; Kumar, 2025; Sowjanya & Kumar, 2025; Khan et al., 2025; Dixit et al., 2025) |
| AI/automation in FIRs | Faster, more accurate drafting | Reduces errors, delays, and police workload | (Khan et al., 2025; Gopal, 2024; Kumar, 2025; Dixit et al., 2025) |

Figure 1: How Zero FIR and digital FIR tools target early-stage delay.

Comparative Framework: BNSS Modernization vs. Legacy CrPC

The BNSS 2023 codification represents a qualitative institutional advancement over the prior CrPC regime:

| Dimension | CrPC 1973 | BNSS 2023 |
|-----------------|-------------------------|---|
| Zero FIR Status | Judicial precedent only | Explicit statutory mandate (Section 173(1)) |

²⁴<https://www.ecoi.net/en/document/2125923.html>.

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| | | |
|------------------------|---|---|
| E-FIR Recognition | Not recognized | Permitted with 3-day signature requirement |
| Preliminary Inquiry | Generally impermissible post- <i>Lalita Kumari</i> | Statutory 14-day window for 3-7 year offenses |
| Penalty for Refusal | Section 154(3) CrPC judicial remedies | Explicit Section 199(c) BNS criminal penalties (6 months-2 years) |
| Transfer Procedures | Not explicitly addressed | Section 173(2) provides explicit procedures |
| Victim Safeguards | Limited to sexual offense provisions | Extended to disability accommodations, videography mandates |

Figure 2: Comparative Framework: BNSS Modernization vs. Legacy CrPC

The BNSS transition accomplishes critical objectives. It removes interpretive ambiguity by placing Zero FIR on explicit statutory footing; it strengthens enforcement through criminal penalties rather than relying solely on judicial remedies; it integrates e-FIR technology to expand accessibility; and it broadens victim protections beyond gender-specific contexts to address disability and trauma-informed recording requirements.

Efficacy as a Justice Acceleration Mechanism:

Research suggests Zero FIR delivers meaningful acceleration benefits, though empirical measurement remains incomplete. A comprehensive mixed-methods study concluded that Zero FIR can "expedite the FIR filing procedure, shorten the duration of investigations, and increase police accountability," with particular utility in evidence preservation and victim response time. The mechanism eliminates the temporal gap previously created by jurisdictional disputes, often measured in days or weeks during which evidence degradation occurred and victim trauma intensified.²⁵

²⁵<https://www.ijfmr.com/papers/2025/5/56740.pdf>.

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However, effective acceleration depends upon implementation fidelity. The same research identified that "lack of awareness, inadequate infrastructure, and training issues" prevent full realization of these benefits. Where awareness is high and infrastructure functional; as in metropolitan areas with cybercrime units utilizing e-FIR systems, Zero FIR delivers demonstrable acceleration. Where training is deficient and inter-station coordination weak, the mechanism's benefits attenuate.²⁶

National statistics quantifying Zero FIR filings, success rates, or investigation timelines remain unavailable in published form. This data gap reflects either inadequate tracking systems or incomplete centralization in the CCTNS, limiting evidence-based assessment of the provision's large-scale impact. Research capacity for comprehensive evaluation of Zero FIR efficacy remains underdeveloped.

Contribution to Speedy Justice:

Empirical and doctrinal work suggests Zero FIR can **expedite filing**, trigger investigation earlier, and improve police responsiveness and accountability.²⁷²⁸ BNSS 2023 links Zero FIR and e-FIR with **time-bound investigations**, explicitly tying them to the constitutional right to speedy justice under Article 21.²⁹³⁰ In cyber-crime and online violence against women, Zero FIR has been judicially endorsed to overcome jurisdictional complexity and encourage reporting.³¹

OBSTACLES AND LIMITATIONS:

²⁶ Ibid

²⁷ T., V., Balamurugan, H., & R, S. (2025). A Comprehensive Analysis Of Zero Fir And Human Rights Obstacles And Possibilities In Obtaining Justice. *International Journal For Multidisciplinary Research.*<https://doi.org/10.36948/ijfmr.2025.v07i05.56740>

²⁸ Sahu, S. (2025). Justice on Time: A Legal Appraisal of Time-Bound Investigations, Zero FIR and e-FIR under BNSS, 2023. *International Journal For Multidisciplinary Research.*<https://doi.org/10.36948/ijfmr.2025.v07i05.58738>

²⁹ Kowshikaa, A. (2024). India's Criminal Justice Reform: An In-Depth Look at The New Laws. *Journal of Law and Legal Research Development.*<https://doi.org/10.69662/jllrd.v2i1.35>

³⁰ Dalmia, A. (2023). THE IMPACT OF PENDING COURT CASES ON THE EFFICACY OF THE JUDICIAL SYSTEM IN INDIA: "JUSTICE DELAYED IS JUSTICE DENIED". *International Journal of Social Science and Economic Research.*<https://doi.org/10.46609/ijsser.2023.v08i10.005>

³¹ Chandel, J., & Sethi, A. (2025). Judicial Interpretation and Enforcement Challenges in Addressing Cyber Crimes Against Women in India. *International Journal of Advanced Research in Science, Communication and Technology.*<https://doi.org/10.48175/ijarsct-29961>

Despite legal mandates, Zero FIR implementation remains significantly constrained by institutional and infrastructural barriers that diminish its efficacy.

- i. **Awareness and Training Gaps:** Research indicates insufficient public and police knowledge of Zero FIR provisions. Many officers continue to deny Zero FIR registration due to training deficiencies or bureaucratic resistance, despite explicit statutory obligations. A mixed-methods study examining Zero FIR effectiveness concluded that lack of awareness among both public and law enforcement "constitutes a major obstacle" to realizing the provision's benefits. Departmental training initiatives, while mandated by High Court rulings, remain inconsistently implemented across police hierarchies.³²
- ii. **Inter-Jurisdictional Coordination Failures:** The transfer mechanism depends upon reliable communication and procedural clarity across police station networks—infrastructure frequently lacking in India's fragmented policing structure. Improper or delayed transfers hinder investigation progression and create investigative gaps. Administrative silence on transfer timelines or receipt acknowledgment leaves complainants without transparency regarding case status.³³
- iii. **Potential Misuse Concerns:** The mechanism's accessibility creates forum-shopping risks, whereby complainants file at convenient locations rather than jurisdictionally appropriate stations, imposing investigative burdens on non-territorial units. The Bimla Rawal v. State case (Supreme Court) exemplified this: despite all offenses occurring in Mumbai, an FIR was filed in Delhi at the accused's behest, requiring Supreme Court intervention to quash the improperly registered case. Such misuse diverts police resources and muddies investigative authority.³⁴
- iv. **Monitoring and Accountability:** Nationwide monitoring systems to track Zero FIR compliance and prevent procedural manipulations remain underdeveloped. Police refusals persist despite legal penalties, suggesting enforcement challenges in converting statutory obligations into consistent institutional behavior.³⁵
- v. **Infrastructural Gaps:** Uniform electronic registration and tracking systems across state boundaries remain incomplete, creating jurisdictional silos that impede smooth transfers.

³²<https://www.gktoday.in/zero-fir/>.

³³<https://www.linkedin.com/pulse/zero-fir-effective-tool-combating-crime-legaledge-law-school/>.

³⁴<https://bnblegal.com/article/zero-fir/>.

³⁵<https://www.ecoi.net/en/document/2125923.html>.

The CCTNS connectivity milestone (17,000+ stations as of January 2025) is recent, and many stations reportedly still lack functional electronic systems.³⁶

- vi. **Absence of Comprehensive National Data:** The lack of national statistics on Zero FIR filings, success rates, or investigation timelines, limits the ability to assess the large-scale impact of the provision.
- vii. **Operational and Institutional Barriers to Effective Implementation:** Low awareness, inadequate police training, and weak infrastructure limit Zero FIR's use, especially outside metros³⁷³⁸.
- viii. **Systemic Delays Beyond FIR Registration:** Systemic issues case backlogs, slow trials, unfair investigations still cause major delays beyond the FIR stage³⁹⁴⁰.
- ix. **Risks of Digital and AI-Driven Solutions:** Digital and AI solutions risk reinforcing inequalities where **digital divide** and low legal literacy persist⁴¹⁴²⁴³.

RECOMMENDATIONS AND FUTURE DIRECTIONS:

- I. **Intensive Training and Awareness Campaigns:** The Ministry of Home Affairs should mandate standardized Zero FIR training modules for all police ranks, with emphasis on the constitutional dimensions (Article 21) underlying the provision, penalty provisions for refusal, and procedural steps. Public awareness campaigns should target marginalized communities and women's organizations to communicate rights and access procedures.

³⁶ Ibid

³⁷ Chandel, J., & Sethi, A. (2025). Judicial Interpretation and Enforcement Challenges in Addressing Cyber Crimes Against Women in India. *International Journal of Advanced Research in Science, Communication and Technology*. <https://doi.org/10.48175/ijarsct-29961>

³⁸ Sahu, S. (2025). Justice on Time: A Legal Appraisal of Time-Bound Investigations, Zero FIR and e-FIR under BNSS, 2023. *International Journal For Multidisciplinary Research*. <https://doi.org/10.36948/ijfmr.2025.v07i05.58738>

³⁹ Singh, A. (2025). The shattered pillar of justice: Human rights violations through unfair investigation and trial in India's criminal justice framework. *International Journal of Advanced Academic Studies*. <https://doi.org/10.33545/27068919.2025.v7.i8b.1620>

⁴⁰ Dalmia, A. (2023). THE IMPACT OF PENDING COURT CASES ON THE EFFICACY OF THE JUDICIAL SYSTEM IN INDIA: "JUSTICE DELAYED IS JUSTICE DENIED". *International Journal of Social Science and Economic Research*. <https://doi.org/10.46609/ijsser.2023.v08i10.005>

⁴¹ Ravindra, D., & Babu, S. (2025). e-Justice in India: A Conceptual Framework. *Indian Journal of Public Administration*, 71, 328 - 341. <https://doi.org/10.1177/00195561251339041>

⁴² Dixit, S., Tripathi, T., & Singh, R. (2025). Incorporating Artificial Intelligence into India's Judicial and Law Enforcement Systems. *International Journal For Multidisciplinary Research*. <https://doi.org/10.36948/ijfmr.2025.v07i02.41822>

⁴³ Mathis, B., & Mussard, S. (2025). How information technology contributes to justice efficiency. *European Journal of Law and Economics*, 60, 145 - 172. <https://doi.org/10.1007/s10657-025-09853-z>

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- II. **Harmonized Inter-State Protocols:** Ministry guidelines should establish explicit transfer timelines (e.g., within 24-48 hours), receipt acknowledgment procedures, and electronic notification systems ensuring transfer transparency. State police chiefs should establish bilateral protocols for expedited inter-state transfers.
- III. **Quality Monitoring and Accountability Systems:** CCTNS should be configured to track Zero FIR filings as a distinct data category, enabling measurement of compliance rates, transfer timeliness, and investigation outcomes. Performance metrics tied to police departmental evaluations should incentivize Zero FIR acceptance and procedural compliance.
- IV. **Digital Infrastructure Acceleration:** The e-Zero FIR model should be rapidly extended beyond cybercrime to sexual assault, trafficking, and mobile crimes (accidents, inter-state thefts). Integration with state-level complaint portals should permit online filing from any location.
- V. **Judicial Supervision and Oversight:** High Courts should establish dedicated PIL benches for monitoring Zero FIR implementation, with regular review of refusal incidents, transfer delays, and misuse cases. Regular data publication on compliance and performance metrics would create transparency-driven accountability.

Future work should focus on intensive training and awareness campaigns for police officers, development of uniform electronic registration and tracking systems, and monitoring and evaluation of Zero FIR implementation to ensure its effective implementation. Future work on Zero FIR could involve further research on its implementation and effectiveness, particularly in the context of marginalized communities and women's organizations, as well as the development of strategies to address the challenges and limitations that hinder its implementation.

CONCLUSION

Zero FIR has the potential to accelerate investigation and evidence preservation, but its implementation remains constrained by institutional and infrastructural barriers, including lack of awareness and training among police officers.

It has the potential to reduce early procedural delay, remove jurisdictional barriers, and make

reporting more victim-centric, but its effectiveness is contingent upon robust infrastructure, police training, digital inclusion, and broader reforms that address slow investigations, trial delays, and systemic human-rights violations.

Zero FIR represents a consequential institutional innovation that addresses a structural vulnerability in India's criminal justice framework by subordinating jurisdictional technicalities to victims' constitutional rights of access and protection. Its elevation from judicial precedent to statutory mandate through the BNSS 2023 reflects institutional maturation and strengthened commitment to victim-centric justice. The mechanism's particular utility for gender-justice and vulnerable-population contexts is well-documented, and its technological extension through e-Zero FIR demonstrates adaptive capacity to leverage digital infrastructure for justice acceleration.

However, the evidence indicates that statutory mandate alone is insufficient for effective operationalization. Persistent awareness gaps, training deficiencies, inter-jurisdictional coordination challenges, and monitoring deficits limit Zero FIR's transformative potential. The mechanism functions optimally in high-capacity environments (metropolitan, technologically equipped police units) but remains vulnerable to institutional resistance and procedural manipulation in weaker governance contexts.

Realizing Zero FIR's promise for "speedy justice" requires complementary institutional investments in training, systems integration, monitoring, and accountability. Without these reinforcing measures, Zero FIR risks remaining a procedural possibility available in principle but inconsistently accessed in practice—a perpetuation of the procedural justice gaps it was designed to eliminate. The framework exists; institutional will to implement it with fidelity remains the critical constraint.

Thus, Zero FIR is a promising tool to reduce early procedural delay, remove jurisdictional barriers, and make reporting more victim-centric, especially when combined with e-FIR and AI-enabled FIR systems. However, it can only contribute to "speedy justice" if backed by robust infrastructure, police training, digital inclusion, and broader reforms that address slow investigations, trial delays, and systemic human-rights violations in India's criminal justice system.

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