



STATUS SYMBOL OR ACTUAL THREAT PERCEPTION? JUDICIAL INTERVENTION TO PROTECT POLICE FROM SCOURGE OF EXTENDING VIP SECURITY COVER.

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Abstract:

The security cover to the protectee has become a controversial issue as many seek to get the security cover to show their supremacy and as a status symbol. The idea of providing security cover to any dignitary or individual was that he is amenable to threat to his life and thereby requires additional security from the State. Such threat perception was based on the inputs received from the State and Centre agencies, but of late it is seen that there has been a growing trend in providing security cover on flimsy grounds, leading to its misuse apart from resulting in wastage of state exchequer. Additionally, this also causes undue burden on the police force being deployed in security cover, as the primary task of maintenance of law and order and prevention and investigation of crimes are adversely impacted. Despite low police public ratio and the directives issued by the judiciary from time to time, the malady of misuse of security cover is still rampant in the country.

Keywords: Threat assessment, VIP Duty, Article 21, security, Status symbol

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I. Introduction:

The daunting task of maintaining law & order in the State is entrusted to the police who is also entrusted the task of providing security arrangement to the VVIPs¹ within the area. The Police being a state subject², therefore, the responsibility of providing security to an individual and constitutional functionaries rests primarily with the State Government/Union Territory administration,³ in whose jurisdiction, such individual ordinarily resides or happens to be.⁴

The main reason for providing security cover to such dignitaries is that they are amenable to various life threats and it is the responsibility of the State to protect them. For this purpose, various set of parameters are to be taken into account in order to measure the threat perception so as to decide the security cover apart from the position which the dignitary is holding. Such task is to be performed by the police with utmost care and caution,⁵ not only when the dignitary is residing but also when he is passing through the territory of the State or Union Territory. The Hon'ble Madras High Court in *J. Jayalalitha v. State of Tamil Nadu & Ors.*,⁶ had held that as the custodian of the rights of its citizens, the State has a bounden duty to protect and preserve the inherent rights of its citizens. The State cannot shirk its primary responsibility of providing an atmosphere in which every citizen could enjoy, in full measure, the fundamental rights enshrined in the Constitution of India. Though the State has a duty to protect each of its citizens, there are some who need enhanced protection due to their

sensitive position or post or the role which they perform in public life.

It is worth mentioning that the security arrangement is a challenging task which requires constant coordination with all the other agencies of the Government such as IB, RAW, SPG and District administration as the State Administration alone cannot handle the said task. Therefore, all these agencies must work in tandem for intelligence gathering and assessment of threat perception in order to ascertain whether a non protectee requires the security cover. The purpose of such co-ordination would ensure that the task is performed without any inconvenience or undue glitches.⁷ Providing security to important persons and dignitaries is complex subject, which has to be reviewed by the State Government, periodically on the basis of threat perception, which such persons are subjected to. In addition to this, the security is also dependant on many other factors namely resources of the State, strength of the police personnel etc.

For sound democracy, maintenance of political stability and as well as law and order, security of such persons is of paramount importance. However, in the recent times, the provision of the security to political personalities as well as Officers and other persons, has become a status symbol. A man without two gunners behind him, is considered to be a commoner but if he moves under the umbrella of the security then he is considered as a distinguished and very important person. Such malpractice leads to additional and unnecessary burden upon the State Exchequer as well as the Police which is otherwise primarily responsible for maintaining law and order in the society. Whenever life of a person is under threat and he comes to the Court for providing him security, the Courts often direct the State Government to consider the perception of threat and thereafter pass appropriate orders.⁸

¹ VIPs are those dignitaries who, owing to their office, high status and influence are considered to be a very important person in the society and often a class apart.

² Article 246 of the Constitution of India, List II of Schedule VII.

³ *Nara Chandra Babu Naidu v. State of Andhra Pradesh*, WP No. 8280 of 2019, decided on 14.08.2019 (Andhra Pradesh High Court).

⁴ Unstarred Question Number 3892, Ashok Kumar Rawat, *Security Cover*, Lok Sabha (18.02.2014), available at <http://mha.gov.in>,

⁵ *M.C. Mehta v. Union of India*, Writ Petition No. 13381 of 2014 decided on 25.11.2013 (Supreme Court)

⁶ *J. Jayalalitha & Ors. v. State of Tamil Nadu*, WP No. 33724 of 2007, decided on 09.06.2018 (Madras High Court).

⁷ Security Arrangements for very important personages/protected persons, chapter XXVI, Para 1253-54 available at <https://police.py.gov.in/Police%20manual/Chapter%20PDF/CHAPTER%206%20Security%20arrangements%20for%20very%20important%20personages%20protected%20persons.pdf>,

⁸ *Raj Singh v. State of U.P.* Writ Petition No. 615 (MP) of 2000, decided on 09.02.2000 (Allahabad) (DB)

Since the protection of an individual falls within the State domain, hence State Police Forces are expected to secure the life and limb of the individual. As such the incidental expenditure in providing security also is to be borne by the State Government concerned. The Central Security Agencies perform a comprehensive threat assessment and on that basis the security is determined.

There are various categories of security cover provided to the dignitaries which are as under:

1. *SPG (Special Protection Group)*- this group is responsible for the security of the Prime Minister.⁹
2. *Z+ category*- it comprises of 55 personnel, including more than 10 NSG commandos and police personnel. The commandos deputed here are NSG or black cat commandos. In India this security cover is given to 450 VIPs of the country.
3. *Z category*- this category comprises of 22 personnel, including 4-6 NSG commandos and police personnel.
4. *Y+ category*- this security cover comprises of 11 personnel, including 2-4 commandos and police personnel.
5. *Y category*- this category consists of 8 personnel, including 1 or 2 commandos and police personnel.
6. *X category*- this category includes 2 personnel, with no commandos but only armed personnel.¹⁰

The high dignitaries are always amenable to various threats from anti- social elements, terrorist organizations and various rival factions. The country has already witnessed assassinations of highest dignitaries in the past. Therefore, the role of providing security cover to such dignitaries assumes much greater importance. A Special Task Force was thus constituted to provide proximate security to the Prime Minister of India and his family members. Even a high powered committee headed by Shri Birbal Nath was constituted to examine the aspect of VIP security and make necessary recommendations. The recommendations of the said Committee

ultimately culminated in the formation of the Special Protection Group. Similar observation was laid down in the case of *L/Nk V.H.K. Murthy v. Special Protection Group and Ors.*,¹¹ wherein the Hon'ble High Court had raised serious concerns regarding providing security cover to the highest dignitaries especially under the circumstances where high dignitaries were either assassinated or serious fatal attempts were made on them.

Although, the highest dignitaries of the country are provided the security cover by virtue of their office as per the guidelines and norms of the Government (blue book and yellow book) but there are certain individuals who are also given this protection on the basis of threat to their life. The problem arises in gauging their threat perception as there are no well defined rules and guidelines for providing security cover to such persons. However, over the period of time, the judiciary has evolved certain parameters and guidelines vis-à-vis security cover to individuals and dignitaries.

In *G. Subas Reddy v. State of Andhra Pradesh and Anr.*,¹² the Hon'ble Court had the occasion to deal with the issue relating to providing security cover to the protected persons and laid down various guidelines in this regard which are as follows:

- (1) State's Duty to Protect Constitutional Functionaries as well as the property of the State from the funds of the State Exchequer.
- (2) Government to evolve a comprehensive policy framework to provide security to statutory authorities.
- (3) State is under an obligation to protect its citizens from any kind of imminent threats failing which the servants and agents to be held answerable to the Courts of Law.
- (4) In case any individual apprehends any imminent threat to his life, he may approach the competent authority at district level for the redressal of his grievances and the competent authority would be duty bound to pass suitable orders upon such application. In case the application gets rejected, he may appeal against the said orders to the appellate authority. The security so provided would be borne out of his own expenditure and shall not be paid from the States Exchequer

⁹ Governed by the SPG Act, 1988 which established specialized security force for providing security arrangement of Prime Minister and his family. The Act was enacted after the assassination of the then Prime Minister Smt. Indira Gandhi.

¹⁰Supra 8 at Para 1255.

¹¹*L/Nk V.H.K. Murthy v. Special Protection Group and Ors.*, 2000 (57) DRJ 157 (Del).

¹²*G. Subas Reddy v. State of Andhra Pradesh and Anr.*, 1997 CriLJ 1296

(5) In exceptional circumstances wherein an individual apprehends serious threats from the Police, he may approach the Court of Magistrate for seeking protection of his life and liberty.

The bare perusal of the afore mentioned guidelines would reveal that an individual who apprehend threat to his life can approach the competent authority at the first instance (district level) for deployment of special force for maintenance of peace and protection of his life or liberty and the competent authority is under an obligation to pass appropriate orders without any delay. It is only when such an application is refused, then these orders are susceptible to judicial review.¹³

The courts have time and again stressed upon the fact that the security cover must be given only when there is actual threat perception and not otherwise, which not only creates undue burden upon the state's fund but also adversely affects the functioning of the police in their law and order and investigation role. Due to their deployment in VIP bandobast duties, they do not give adequate time to conduct proper investigation. Although as per the provisions of Article 21 of the Constitution, which envisages that no one shall be deprived of his right to life and liberty except in accordance with the procedure established by law, but none can direct the State as a matter of his right, to provide him with personal security to ensure that his life is protected.¹⁴ The police protection cannot be granted on the mere asking of it. There has to be a serious and imminent threat perception, which should be based on some cogent, clear and reliable material.¹⁵

The Hon'ble Apex Court had the occasion to deal with the issue relating to police protection given to the VIP in *Ramveer Upadhyay v. R.M. Srivastava*,¹⁶ wherein the Court lamented that it had hardly seen any security cover of 'Z' or 'Y'

category provided to any ordinary citizen however, grave the threat perception or imminent danger may be to the person concerned. But what exactly is the threat perception and whether the same is grave in nature, will have to be left to be decided by the state and Central authorities which is entitled to assess the threat perception of an individual. Similarly, in *Katasani Rami Reddy v. Government of Andhra Pradesh*¹⁷, it was held that threat to one's life may be temporary and in such a case continuous security may not be needed. Therefore, whenever personal security is provided to a person, it must be constantly reviewed by the Superintendent of Police and when on the basis of information available with him, he genuinely feels that the threat has vanished, he may recall the security. Again, in *AjjuguttuRagunatha Reddy v. The State of AP*,¹⁸ the Hon'ble Court, while relying upon the judgment of the Hon'ble Supreme Court in *National Human Rights Commission v. State of Arunachal Pradesh and Ors.*,¹⁹ observed that providing security cover to the individual citizen is nothing but a burden to the State and the State cannot be burdened with the liability of providing armed escort/gun-man to such of those persons who indulge in factions and group rivalry, unless it is clearly established that there is direct threat to their life from known and identified persons or group of persons.

The prescribed Rules/Guidelines for X, Y, Y+, Z and Z+ category and other protectees, specifically stipulates that "existence of threat to an individual from his/her professional rivals should not be considered the basis for provision of categorized security". Threat is a dynamic phenomenon. It changes its dimension and form from time-to-time and from place-to-place. This change can be individual specific, situation specific and place specific. The degree of threat may vary from individual to individual and from situation to situation, such as individual's nature of activities, importance in the scheme of decision making and strategic role played in the existing environment. The tendency to continue with the security arrangements even in the absence of any actual threat for extraneous considerations should be

¹³*Bhoomireddy Ramgopala Reddy v. State of A.P.*, W.P. No. 7822 of 2019 decided on 15.7.2019 (Andhra Pradesh High Court)

¹⁴*A.V. Subba Reddy v. Superintendent of Police (AP)*, W.P. No. 18738 of 2007 decided on 22.06.2010 (Andhra Pradesh High Court)

¹⁵*Anil Kumar alias Anil Rana v. State of Uttrakhand & Ors.*, WP No. 861 of 2021 decided on 22.11.2021 (Uttrakhand)

¹⁶*Ramveer Upadhyay v. R.M. Srivastava*, 2013 (7) SCALE 564

¹⁷*Katasani Rami Reddy v. Government of Andhra Pradesh*, 1998 CrLJ 3897 (AP)

¹⁸*AjjuguttuRagunath Reddy v. The State of AP*, WP No. 9979 of 2019, decided on 03.01.2020 (Andhra Pradesh High Court)

¹⁹*National Human Rights Commission v. State of Arunachal Pradesh and Ors*, 1996 AIR 1234 SC 6558

avoided.²⁰If a person is himself indulged in some criminal activities and thereby he has enhanced perception of threat to his life and liberty, he cannot look upon to the State to provide him separate security at the cost of common man, when he himself is responsible for enhancing threat perception due to his own anti-social activities.²¹

In *Rajinder Saini v. State of Punjab & Ors.*,²²the Hon'ble High Court of Punjab and Haryana, observed that the politicians or holders of party offices just to show their might are seeking security, the same cannot be provided merely on asking. If there is actual threat then only concerned authority can consider the case and make recommendation to the Government at their own level for providing security.

Threat assessment is always subject to continuous scrutiny by the State and Centre agencies and in absence of any specific input of threat to the protectee, the same may be withdrawn, but fair opportunity may be afforded to the protectee before passing such suitable orders, as held in the case of *Randeep Surjewala v. Union of India and Ors.*²³

Recently, in *Om Prakash Soni v. State of Punjab*,²⁴the Hon'ble Court observed that security issue is not a static phenomenon, rather it is a dynamic process in which security has to be reviewed on a periodic basis while accessing the threat perception of the protectee with the passage of time on the basis of intelligence inputs from State and Central Agencies. Only those persons are entitled to security cover who falls within the parameters based upon the real threat perception. Such demand of security cover cannot be on the basis of displaying an authority of symbol or to flaunt ones' status as an important person. No

privileged class can be created out of the money of the taxpayer. Personal security cover cannot be claimed as a matter of right and in perpetuity. Even, in *M.A. Khan Chaman v. State of U.P. and Ors*²⁵, it was held that there is no right vested in any person to enjoy this privilege ad infinitum, it is often seen that on flimsy grounds, people by exercising undue influence manage to secure gunners and security at the State expenses and at the cost of tax payers. In fact acquisition of a gunner has begun to be treated as a status symbol. This practice must be brought to an end.

However, it is seen that excessive police force is deployed for VIP Bandobast duties. As per the study conducted by the Bureau of Police Research and Development (BPR&D), Ministry of Home Affairs, Government of India, in its report submitted in 2019, reveals the following data²⁶:

Year	Police officials deployed	VIP Protectees (Ministers, MP, Judges and others)
2018	43,556	21,300
2019	66,043	19,467

Going by the state-wise figures, it was revealed that there is an unequal trend in giving security cover to the protectee. The highest numbers of persons receiving the said VVIPs patronage were from West Bengal which is 3142, followed by Punjab with 2594, Bihar with 2347, Haryana with 1355 and Jharkhand 1351. The Delhi police had deployed 8182 police official for personal protections of dignitaries.²⁷ The above data would clearly depict that there is an upward trend in VIP Security Cover, thereby burdening the Police and disparity in providing security cover in each State. Also, there has been increased expenditure being incurred by the Government in providing the security cover to the protectee.

²⁰*Paritala Sunitha v. State of Andhra Pradesh*, WP No. 16540 of 2019, decided on 21.11.2019 (Andhra Pradesh High Court).

²¹*Gayur Hasan v. State of U.P. & Ors.* 2009 (64) ACC 558

²²*Rajinder Saini v. State of Punjab & Ors.*, CWP No. 19453 of 2015, decided on 16.09.2015 (Punjab & Haryana High Court).

²³*Randeep Surjewalav. Union of India and Ors.*, CWP No. 13266 of 2016, decided on 10.03.2017 (Punjab and Haryana High Court)

²⁴*Om Prakash Soni v. State of Punjab*, CWP No. 11872 of 2022, decided on 22.08.2022 (Punjab & Haryana High Court).

²⁵*M.A. Khan Chaman v. State of U.P.* WP No. 484 of 2002, decided on 01.04.2004 (Allahabad) (DB)

²⁶ Ministry of Home Affairs, Government of India, *Data on Police Organisations, Bureau of Police Research and Development*, (as on 01.01.2021) available at <http://Bprd.nic.in/WriteReadData/userfiles/files/202101011201011648364DOPO010112020.pdf>

²⁷Vijaita Singh, *Over 66,000 police on VIP duty in 2019 : Report*, The Hindu (30.12.2020), available at <https://www.thehindu.com/news/national/over-20000-additional-policemen-deployed-in-vip-duty-in-2019-report/article33454795.ece>,

Table 1.1 Expenditure of Police (in crores)²⁸

Year	Rs. (in crores)
2021-22	1,09,266.3
2022-23	1,17,688.99

Chart 1.1

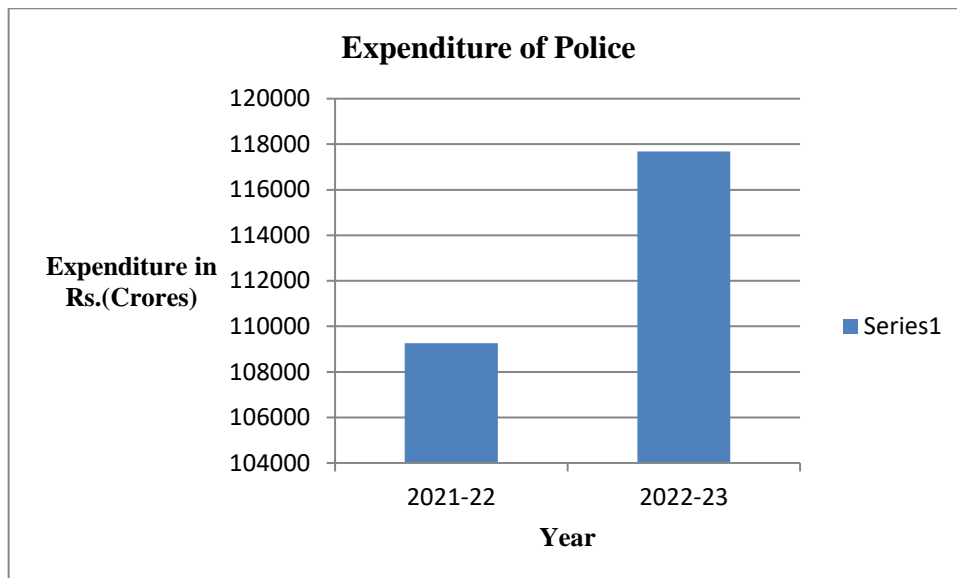
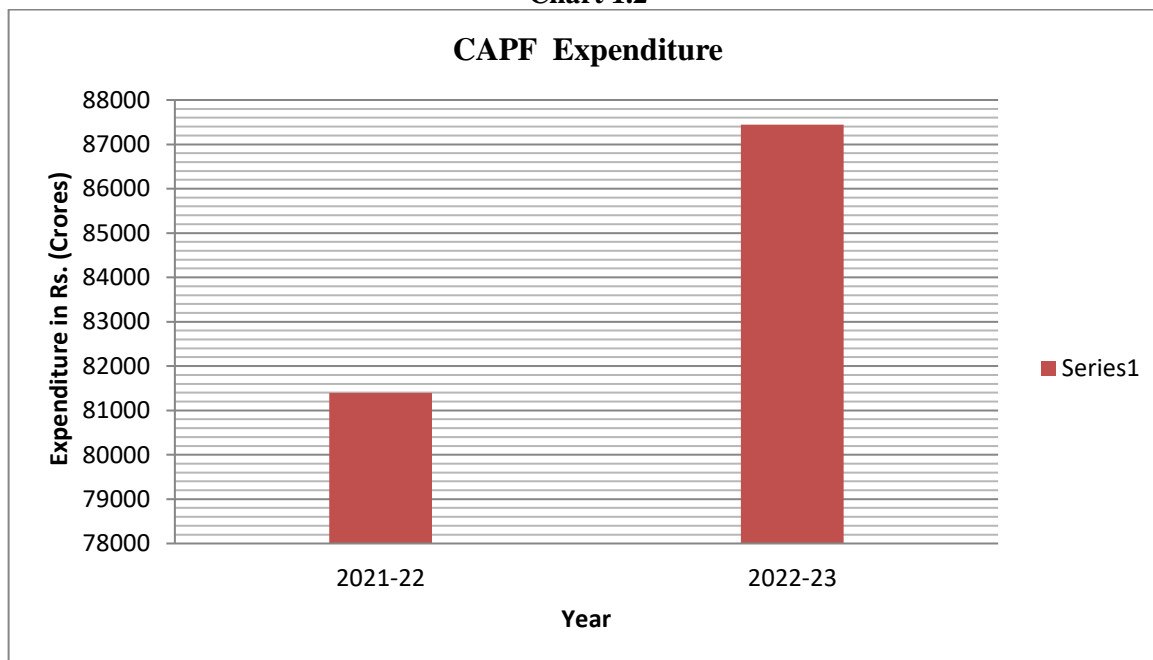


Table 1.2 CAPF Expenditure²⁹

Year	Expenditure in Rs. (Crores)
2022-23	87444.06
2021-22	81396.25

Chart 1.2



²⁸ Reference Note No. 10/RN/Ref/March 2022, Ministry of Home Affairs, p.4. Available at: https://loksabhadocs.nic.in/Refinput/New_Reference_Notes/English/14032022_174810_102120474.pdf

²⁹ Budget, Ministry of Home Affairs, Demand No. 51, Police, Notes on Demand for Grants 2023-24. Available at :<https://www.indiabudget.gov.in/doc/eb/sbe51.pdf>

Table 1.3 Allocation of Funds to Special Protection Group (SPG)³⁰

Year	Allocation of funds (Rs. Crores)
2022-23	411.88
2023-24	433.88

Chart 1.3

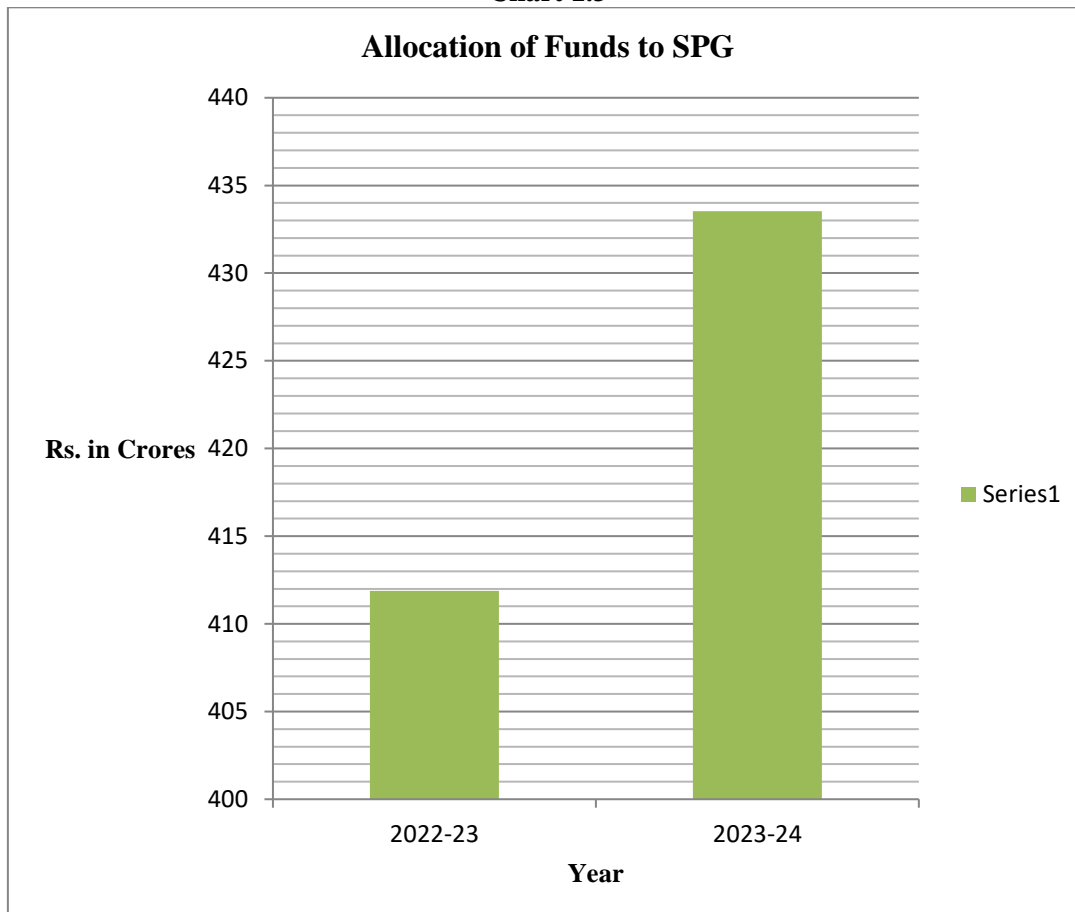


Table 1.4 Bifurcation of expenditure under Police³¹

Department	2021-2022 (Rs. in Crores)	2022-23 (Rs. in Crores)
Central Armed Police Forces	81396.25	87444.06
Delhi Police	11136.22	10096.29
Police infrastructure	3023.25	3918.84
Intelligence Bureau	2793.02	3168.35
Modernization of Police	3345.89	2754.16
Border Infrastructure	2700.57	2744.52
Others	4871.1	7562.77
Total	109266.3	117688.99

³⁰ Ibid.

³¹ Ibid

Chart 1.4

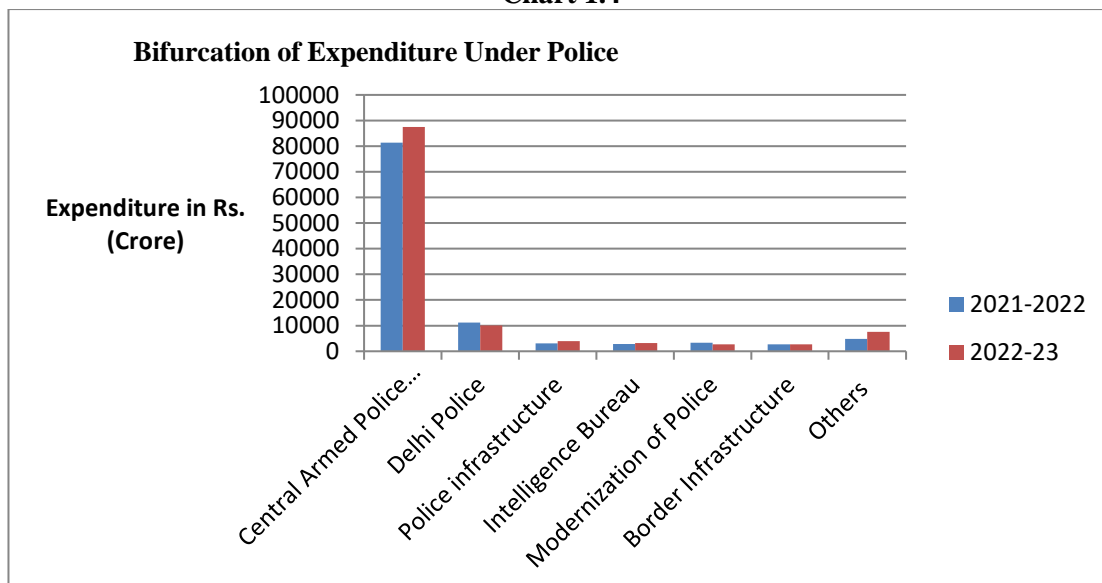


Table 1.5. Total Sanctioned and actual strength of Police Force³²

Department	Total Sanctioned Strength	Actual Strength
State Force	26.89 lakhs	20.93 lakhs
CAPF	11.00 lakhs	9.80 lakhs

Chart 1.5

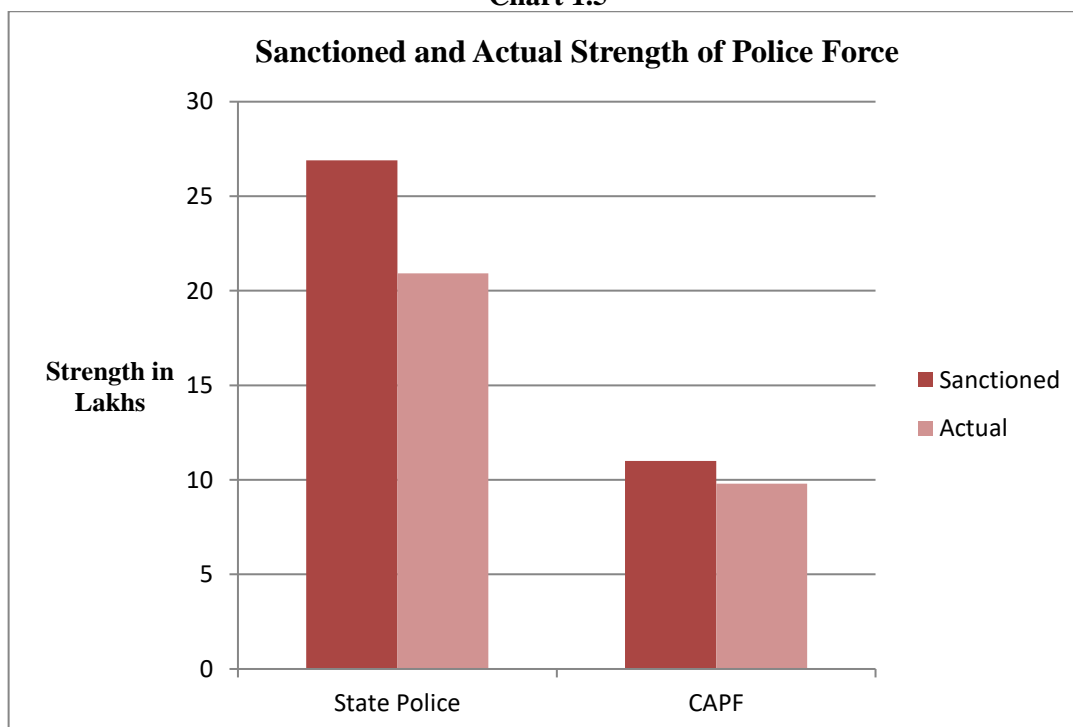


Table 1.6 Police-Public Population Ratio³³

Year	Police Public Ratio (Per Lakh of Population)
2021	196.23
2020	193.95

³² Supra 27 at p.44.

³³ Ibid at p. 38.

As depicted from the charts and tables mentioned hereinabove, it can be easily inferred that the police public ratio is abysmally low and in view of the upward trend in providing security cover would further result in overburdening the already burdened police force and depriving them from performing their other core responsibilities as law and order maintenance, prevention of crimes and crime investigation.

In addition to this, the upward trend in expenditure also shows additional burden on the State Exchequer in extending security covers. If the police protection is to be given on actual security concerns, then the said figure should run in hundreds, whereas, it is common practice to give police protection for politically motivated reasons.³⁴ The security cover has become more of a status symbol rather than the genuine necessity of securing ones' life and limb. Even otherwise, huge amount of exchequer's funds are utilised in the said purpose which could otherwise be allocated for other requisite developmental and welfare functions. This could be gauged from the bare analysis of the budgetary allocation to the police. As regards the budgetary allocation apportioned for security of VVIPs, the data shows an increase in the allocation.

Conclusion:

Although, the primary task of the police is to maintain law and order in the society, but this important role assigned to the police takes a back seat, when the police personnel are deployed in security arrangements of VIPs and other protectees. Generally, it is seen that the purpose for which VIP security is given seem to be diluted due to highly politically motivated reasons leading to misuse of the security cover under the guise of seeking status symbol. There is lack of transparency in the manner in which security cover is provided to private individuals so as to treat those as class apart which adversely affects the faith of the people in the Government and it is rather seen as misuse of their money. There have been instances where security covers are given to celebrities, political figures, business and media influencers without gauging and reviewing their actual threat perceptions. Despite clear cut directions being laid down by the judiciary calling

upon the Government to refrain from providing security cover to persons who are otherwise not eligible, the Government tends to dilute those guidelines for their own political agendas, mindless of the fact that huge amount of public money is spent in the said process. It is often seen that under the guise of security cover, the person sometimes concoct or exaggerate the threat perception so as to receive the security cover. The Government ought to adopt certain strict parameters for providing security cover to private persons in a more transparent and fair manner. Rather, the Government should insist upon the protectee to share the entire burden of security arrangement/ cover if the Government actually provides the same to them. This would serve the twin purpose of providing security to the persons who are not listed in the category of protectee and without causing any unnecessary loss of public funds which could otherwise used for welfare and development of police. Even a separate police force ought to be earmarked for the said purpose, so that the normal police functions are not disrupted as the burden of providing security cover is also shared by the officials of State Police, which is mainly responsible for investigation, prevention of crime and maintenance of law & order in the State.

Since the threat perception is not static but dynamic in nature, therefore, it become incumbent upon the concerned authorities to constantly review the threat perception of the protectee from time to time and the security cover may be removed when there is no such imminent threat perception. Also deploying the police forces unnecessarily has its own set of repercussions which leads to overburdening the already burdened police personnel leading to various mental and physical health hazards given the nature of duty to be performed. These personnel have to stand for hours together, sometimes with no time for rest, food and recreation leading to possible health hazards. Many a times, the leaves already sanctioned to the police personnel gets cancelled owing to VIP security arrangements, thereby causing emotional and social stress. It is noteworthy to mention that the policemen should not become private guard.

Therefore, the actual threat perception and not political motivation should be the decisive factor in deciding security cover is the need of hour in a country where the police public ratio is disproportionate. This would allow the police personnel to focus on their primary role of maintaining peace, law & order and investigation.

³⁴ Deeptiman Tiwari, *Bengal, Punjab, Haryana has maximum VIPs with police security: BPR&D*, The Indian Express (31.12. 2020) available at <https://indianexpress.com/article/india/bengal-punjab-bihar-have-maximum-vips-with-police-security-bprd-7126957/>.

It is suggested that an additional force specifically catering to the task of providing the security cover and VIP bandobast duties should be made available, which would ultimately relieve the State police of its additional role of providing security arrangements. Besides, the individuals must also exercise a sense of responsibility while asking for additional security cover so that the time, energy, manpower and financial resources of the State are not unduly misused.

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