


Algorithmic Anklets: A Case for Electronically Monitored Bail (EMB) in India

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Abstract: The Supreme Court of India in the case of Satyendra Kumar Antil's judgement opined that the subordinate courts are reluctant to grant bail even in cases where bail is the norm. The primary reasons for the subordinate court in not granting bail is that the accused on bail cannot be monitored effectively by the law enforcement agencies; and the subordinate courts do not want to be a mere scapegoat at the hands of the High Court and Supreme Court if they turn fugitive or tamper with evidence or manipulate witnesses. In the case of Frank Vitus judgment, the Supreme Court held that an accused released on bail is not required to share their Google live location with the investigating agencies. This vacuum of an institutionalized setting, under which the undertrial prisoners can be allowed to be released from prison is addressed here. Adopting a doctrinal research methodology based on secondary sources, it is contended that sharing the live location of the accused while on bail with the investigating agencies is an age-old concept. If not with Google PIN location service, the mechanism of Electronically Monitored Bail (EMB) can be developed with the help of Artificial Intelligence to monitor the accused while on bail. It discusses the implications of deploying this mechanism and reasons that it is grounded on a prison abolitionist stance and upholds the rights of the undertrial prisoners.

Keywords: Electronically Monitored Bail (EMB); Artificial Intelligence (AI); Undertrial Prisoners; Criminal Justice Reforms; Bail Jurisprudence in India

1. Introduction

Though the Code of Criminal Procedure (CrPC), 1973 neither defines the term 'bail' or 'bail-bond' Bhartiya Nagarik Suraksha Sanhita 2023, defines 'bail' under section 2 (b) as "release of a person accused of or suspected of commission of an offence from the custody of law upon certain conditions imposed by an officer or Court on execution by such person of a bond or a bail bond" and 'bail bond' under section 2(d) as "an undertaking for release with surety". The issue of bail vs. personal liberty, has always been a central theme of debate from academic contours to courtrooms across jurisdictions in drawing a perfect balance between the two [1].

The criminogenic objection, the most widely recognized objection to imprisonment is that it is not able to control recidivism and may even contribute to further upsurge in it. Bagaric, Hunter and Wolf contend that a prison exposes inmates to hardened criminals and may master the tricks of criminal trade. Further, 'exposure theory' posits that if the inmates are exposed to prison environments and they manage to survive, the quantum of fear diminishes, and the result is that in prospects of future imprisonment, it acts as a weaker deterrent [2]. Moreover, financial objection contends that financial cost of imprisonment to society rises from the fact that the prison inmates are less economically productive than they would have been outside [3]. Though

prison work program continues to function, the inmates are more economically valuable outside prisons [4].

To counter this argument, humane objection contends that confinement is arguably the most humane than capital or corporal punishment. Several imprisonment critics contend that a prison environment is deeply inhumane and violate human right of individual either in limited or total terms. The prison abolitionist believes that use of prison is always immoral. The total rejection critique of prisons is the stand of 'prison abolitionists' who believes that the use of prison is always immoral [5].

As Sophie Angelis puts it-

"Prisons, on this account, are social institutions that reflect and reinforce conditions of racism, socio economic inequality, and other injustices. Prison reform does not disturb those broader injustices, the structural critique goes, and so cannot cure the problem with prisons . . . and prison reform has another problem. That is, there are limits to how humane any prison can be. By definition, prisons operate by removing people from society by force, and locking them up in a constrained place with many others whom they do not know and may not like, under the authority of a prison administration. Those definitional features of a prison create conditions of extreme isolation and control, maintained by constant threats of additional and more severe punishments; these conditions are dehumanizing in the sense that they deprive a person of both connection to society and autonomy over themselves" [6].

2. Supreme Court of India: *Bail is the Rule, Jail an Exception*

It is a settled principle of law that a thousand criminals may be set free, but one innocent need not be punished. In bail jurisprudence as well, the Supreme Court has always taken this stand that bail is the rule and jail is an exception. There is a catena of judgements which deals with rights of the undertrial prisoners and their right to liberty. Recently, in the year 2022, the Supreme Court of India in the case of Satyendra Kumar Antil vs. CBI (MANU/SC/0851/2022) had an occasion to reiterate the principle of bail as a rule and jail an exception [7]. The Supreme Court laid down 11 interim directions. The five relevant guidelines are discussed here.

First is the categorization of offence into 4 distinct categories as Category A: Offenses punishable with imprisonment up to 7 years (not covered by special acts, not punishable over 7 years). Category B: Offenses punishable with death, life imprisonment, or over 7 years' imprisonment. Category C: Special Acts containing stringent provisions (e.g., NDPS, PMLA, UAPA, Companies Act S.212(6), etc.). Category D: Economic offenses not covered by Special Acts for proper facilitation of bail to the undertrial prisoners.

Secondly, the court distinguished between 'power to arrest' and 'justification for arrest' to state that if a person's name is in the charge-sheet, it does not necessarily mean that the person has to be arrested if there are no other substantial reasons available for the same as was held in Siddharth v. State of Uttar Pradesh & Anr. (Criminal Appeal No. 838/2021).

Thirdly, commenting on discretionary power of court in granting bail, the Supreme Court referred Sanjay Chandra vs. CBI (2012 1 SCC 40) to quote that it has to be based on facts and circumstances of each particular case as the primary object of bail is to submit the accused to the jurisdiction of the court and to ensure attendance as and when required [8].

Fourthly, the court underscored the importance of section 436A of CrPC 1973 by directing courts to release undertrials on personal bonds if they have spent more than half of their maximum sentence prescribed for the offence unless reasons recorded for the same.

Fifthly, and most importantly to enact a bail legislation akin to UK's Bail Act, 1976 to streamline the consistent practices across India.

In the follow-up of 2023-25 of the interim guidelines, the Supreme Court ordered to set-up a structured mechanism in each State/UT with Empowered Committees (at district level) and Oversight Committees (at state level) to ensure indigent undertrial prisoners gets assistance under Supreme Court 'Standard Operating Procedure (SoP) for undertrial prisoners [9].

3. Sharing Live Location of the Accused as an Additional Condition for Bail

The Supreme Court in several precedents examined the interpretation of the scope of section 437(3)(c) of CrPC, 1973 which permits laying down of additional condition for bail "in interest of justice". The Court placed reliance in the case of Kunal Kumar Tiwari vs. State of Bihar (2018 16 SCC 74) and clarified that it means "good administration of justice" or "advancing the trial process". The court further placed reliance on Munish Bhasin vs. State (NCT Delhi) (2009 4 SCC 45) and stressed that "bail condition cannot be fanciful, arbitrary or freakish". Drawing from State of A.P vs. Challa Ramkrishna Reddy (2000 5 SCC 712), the court emphasized on the constitutional right of the accused and held that these rights should be curtailed to the minimum extent necessary while imposing conditions for bail [10].

In *Frank Vitus vs. Narcotic Control Bureau and Ors* (2024 INSC 479), a Nigerian national was arrested on 31st May 2014 and prosecuted for offences under Section 8, 22, 23 and 29 of Narcotic Drugs and Psychotropic Substance Act, 1985. On 31st May 2022, Delhi High Court granted bail with two distinct conditions-

- A. A certificate of assurance from the High Commission of Nigeria that the accused shall not leave the country and shall appear before the learned Special Judge as and when required.
- B. The accused shall drop a PIN on the google map to ensure that their location is available to the Investigation Officer of the case.

The Supreme Court of India, headed by a division bench of Justice Abhay S. Oka and Justice Ujjal Bhuyan appointed Shri Vinay Navare, Senior Advocate as Amicus Curiae to decide the validity of these two above mentioned bail conditions. The Supreme Court directed dated 8th July 2024, that obtaining a certificate from the High Commission of Nigeria and dropping a pin of Google Maps are to be deleted as conditions for bail [11].

The Court scrutinized the technical aspect by issuing notice to Google LLC and relied on filed affidavit to state that as the user has full control over sharing location with others and PIN location does not enable real time tracking of the user. The court further reasoned that such constant vigil violates right to privacy under Article 21 of the constitution as it will be amounting to confinement even after being released on bail [12].

In the case of *Mohd. Tahir Hussain vs. State of NCT of Delhi* (MANU/SC/0098/2025) the accused was involved in multiple criminal cases including 2020 Delhi riots, and sought interim bail to campaign for Delhi Assembly Election. The Supreme Court held that it is a statutory right to contest election, but campaigning for it is neither a fundamental or a statutory right. The court denied interim bail, but allowed to pursue regular bail application in Delhi High Court. Justice Pankaj Mithal and Justice Ahsanuddin Amanullah in paragraph 31 intended and pondered over to issue a direction to share the real-time location of the accused with the

Investigating Officer considering the seriousness of the charges and potential for witness tampering, but in view of Frank Vitus Judgement, declined to do so [13].

Similarly, in the case of Sheikh Javed Iqbal vs. State of Uttar Pradesh (MANU/SC/0716/2024) the accused was in custody for over nine years without significant trial progress being charged under IPC and UAPA. The Supreme Court upheld the right to speedy trial of the accused under Article 21, and set aside High Court order denying bail. The court laid down specific bail conditions but refrained from sharing continuous live location sharing as discussed in the Frank Vitus Judgement.

Moreover, in the case of Sunil Kumar Singh vs. Bihar Legislative Council (Through Secretary) and Ors. (MANU/SC/0263/2025), the Supreme Court addressed the expulsion of Sunil Kumar Singh from Bihar Legislative Council following an unparliamentary conduct reported by ethics committee. The Supreme Court involved Article 142 to re-instate the parliamentarian as expulsion is disproportionate in this legislative action. The Supreme Court referred the case of Frank Vitus and declined to direct sharing continuous live location [14].

This issue is further highlighted in the judgements of Andhra Pradesh High Court, Delhi High Court and Kerela High Court judgements. The Andhra Pradesh High Court in the case of Ramesh Santa vs. State of Andhra Pradesh (MANU/AP/1657/2024) addressed the issue of continuous location sharing of Ramesh Santa as a bail condition by the district court. The Andhra Pradesh High Court citing Frank Vitus Judgement relaxed the condition and trusted on the age-old concept of personal bond of Rs.10,000 with sureties [15].

In the case of Joyi Kitty Joseph vs. Union of India and Ors. (MANU/DE/7620/2024) Delhi High Court addressed the legality of detention order against Joyi Kitty Joseph's husband, Sameer Haroon Marchant under COFEPOSA Act for gold smuggling. Delhi High Court was inclined to impose the condition of continuous google location sharing, but declined to do so in view of the Frank Vitus Judgement. Similarly, in the case of OBI Ogochukwa Stephen vs. State of NCT of Delhi, (MANU/DE/7296/2024) High Court of Delhi addressed the issue of bail conditions for Nigerian nations Obi Ogochukwa Stephen and Oscar Enyi as they overstayed their visas and facing charges under NDPS Act. Citing Frank Vitus Judgement, Delhi High Court substituted the cash deposit requirement with reduced surety bond. In the case of Sunil Mathew vs. The Station House Officer, Museum Police Station and Ors. (MANU/KE/3348/2024) Kerela High Court addressed the issue of bail condition while granting anticipatory bail restricting Sunil Mathew, a journalist and Managing Editor of 'i2i News' from airing news about the death of a church leader as fake news. Citing Frank Vitus Judgement, the court reasoned not to infringe fundamental right of freedom of expression unless absolute necessary and continuous live location sharing as bail condition [16].

4. A Case for Electronically Monitored Bail (EMB)

As per NCRB Report on Prisons (2022), India has over 4,34,302 undertrial prisoners contributing to 76 percent of cumulative jail population of 5,73,220. Alarming, 1,34,799 of these undertrials are detained for more than a year. The issue of upholding personal liberty of the undertrial prisoners by not detaining them in prison and the issue of overcrowding in prison can be done by the concept of Electronically Monitored Bail (hereinafter referred to as EMB) through the use of Artificial Intelligence (hereinafter referred to as AI). In this scenario, a undertrial prisoner is released from prison, and their movement is monitored electronically through AI. The foremost argument that can be raised here is that if the person is to be released

from prison and monitored through AI, it will result in an Artificial Intelligence Prison mechanism being established [17]. The person will be in constant psychological trauma of being monitored 24*7, and will aid the least in the very purpose of being released. The response to this argument is that at least the person does not go through the trauma of suffering in an actual prison, and this mechanism is founded on the theory of prison abolitionist. It is to be noted here that prison abolitionist supports open jail concept and its contribution to reforming the individual. The case of EMB is on the similar lines of open jails, but the only difference is that the jurisdiction of it exceeds and it is electronically monitored by AI. The technology of electronic bail will also solve the issue of reluctance among sub-ordinate court to grant bail even in case where bail is the norm [18].

The use of electronic monitoring of an accused is traced back to as early as 1980s in Europe and USA. The use of this technology is justified and rationale as it has a due potential as an alternative to custodial confinement. In United Kingdom, it is used as a valuable tool and as an alternative to remand in custody and it aligns with statutory presumption of bail as set out in Bail Act, 1976 [19]. It is permitted on the satisfaction of the court that without such monitoring, bail would not be granted. In USA, the federal law of Bail Reform Act, 1984 requires court to consider least restrictive condition to ensure the accused presence in courts. It was started to emphasize the severity of an offence and not detaining non-violent offenders. The use of this condition has increased 140 percent from 2005 to 2022 as per the available record. In New-Zealand, the mechanism of Electronic Monitoring on Bail has been incorporated under Bail Act, 2000 vide an amendment in 2013 [20]. It is applicable for people aged between 12-17 years, while they wait for their trial. An electronic monitoring bail is granted by the court on being satisfied that the accused will not interfere with any evidence, witness and does not commit any further offence while on bail. The Act of 2000 specifically provides that this provision will not be imposed if less restrictive measures are available, and thereby it chalks out a fine balance between right to privacy and securing attendance of the accused [21].

In Indian context, report no.268 of Law Commission of India (May, 2017) also recommended this concept by opining that electronic tagging has potential to reduce both fugitive rates (by allowing the defendant to be easily located) and government expenditures (by reducing the detainees detained at state expense). The relevant portion is quoted-

“11.27 The Law Commission the grave and significant impact on constitutional rights of electronic monitoring system and it is of the opinion that such system, if used, must be implemented with highest degree of caution. Such monitoring must be used only in grave and heinous crimes, where the accused person has a prior conviction in similar offences. This may be done by amending the appropriate legislations to restrict the application of electronic tagging to hardened criminals, and any Court order under the specified legislation must contain reasons for the same.”

In the year 2023, the state of Odisha has proposed to implement use of GPS enabled tracking device for undertrial prisoner. The Ministry of Home Affairs, Government of India in November 2023, suggested state governments to use tracking device on prison inmates released on parole as part of Model Prisons and Correctional Services Act, 2023. The relevant portion is quoted-

“Section 29 of the Act of 2023 provides for use of electronic tracking devices on prisoners- Prisoners may be granted prison leave on the condition of their willingness to wear

electronic tracking devices for monitoring the movement and activities of such prisoners. Any violation by the prisoner shall attract cancellation of prison leave, in addition to disqualification from any prison leave being granted in future, as may be prescribed under the Rules” [22].

5. Artificial Intelligence (AI) And Electronically Monitored Bail (EMB)

The issue of AI in the context of EMB is analysed through these three facets- Location Monitoring, Audio and Visual Monitoring and Physiological Monitoring. AI as coined by John McCarthy in 1956 defines it as “the science and engineering of making intelligent machines” Marvin Minsky defines it as “the science of making machines do things that would require intelligence if done by men”. Mathias Risse defines “intelligence” as “the ability to make predictions about the future and solve complex tasks (...) ability demonstrated by machines, in smart phones, tablets, laptops, drones, self-operating vehicles or robots that might take on tasks ranging from household support, companionship of sorts, to policing and warfare” [23].

In the case of location monitoring, apart from AI facial recognition, through GPS and RFID tracking bracelet, the location of inmate can be monitored. It can also be fitted with 2-way microphone, allowing designated monitoring officers to communicate with e-prisoners in acquiring first-hand information and passing on real time warnings or instructions [24].

In case of audio and visual monitoring, the inmate is required to attire an upper body harness equipped with body camera facing both forward and backward. This harness could be detached only at specified time as using washroom or napping with the location observed and communicated by the same algorithmic bracelet. Even if the inmate does not own an accommodation, a simple solution is that the consent of the owner can be obtained and the other residents are notified of the same. This practice is valid for EMB even without AI. This audio and visual monitoring may not be applicable for minor offenders and only for specified offenders, this facility channelled through AI can be utilised [25].

In addition to location and audio-visual surveillance, AI can also be utilized for monitoring the physiology of the inmate. Internal body monitoring can lead to major revelation as to alcohol or drug consumption intentionally or unintentionally. A person’s physiology behaves differently when doing an action intentionally or unintentionally, and this difference can be used by law enforcement agencies in investigation. An intentional attempt is always accompanied by signs of stress or trauma or else in case of unintentional attempt, such signs will be missing. This aspect will aid the law enforcement agencies in discovering many more complicated intricacies in the facts of the case. These three facets employed together will create a robust mechanism for EMB and with the help of AI these can be extensively tailored to suit the circumstances of each and every case corresponding with the individual involved [26].

There are basically three types of counter arguments that can be raised against this mechanism. Firstly, in terms of public safety. Allowing undertrial inmates back to society and the only barrier being a virtual device, is a potential threat to witnesses and tampering of evidences. It also raises a ‘soft on crime’ stand as well from law enforcement perspective. These concerns are valid, and these concerns should be considered while adopting the proper prescription of electronic monitoring measures and not as a counter argument against EMB. Secondly, it can be validly asked as whether electronic prison justly punish the criminals, as it a disproportionately low punishment compared to being in an actual prison. This counter argument can also be considered while adopting the proper prescription of electronic monitoring measures and not as a counter argument against EMB. A key theme of this

discussion is also to ensure that electronic prison is perceived by society as equally punitive as a physical prison. Thirdly, it is also a valid counter argument that human rights and civil rights violations of right to privacy of the undertrial prisoners is also a potential concern. In this proposal, to counter this argument, it is contended that the offender has the valid option to choose between an electronic monitoring mechanism or equivalent prison bar term. EMB is far less invasive compared to a physical prison. It can also be contended that in physical prison, prisoners do not have right to privacy as privacy deprivation is a part and parcel of the punishment imposed [27].

In this proposal for the case of EMB in India, it is contended that the prisoners have the choice to opt between an electronic prison term or the equivalent traditional prison sentence as per the Indian Bail Jurisprudence stance. It is also contended that when considered holistically in terms of prisoner's right, electronic prison is likely to be far less invasive than a physical prison term for the undertrial prisoners. The invasion of privacy necessitated by electronic prison is part of the punishment and the U.S Federal Court opines that inmates do not have a right to privacy in a physical prison as the privacy denial is an integral part of the penalty being levied [28].

6. Conclusions

Electronically Monitored Bail (EMB) through Artificial Intelligence (AI) can be institutionalized by clearly defining the rights and duties of the stakeholders involved. It can be initiated on a pilot project basis and depending on its effectivity can be extended further. Police, law and order and prison are subjects that fall under state list. So, state governments may as well take up this pilot project in devising a working modality for the same. As this mechanism balances the conundrum of imprisonment and right to privacy, the legislature may walk the path in enacting it, and Supreme Court of India can monitor the contours effectively.

Multidisciplinary Domains

This research covers the domains: (a) Law, and (b) Artificial Intelligence.

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Conflicts of Interest

The Author declares no conflict of interest.

Declaration on AI Usage

The authors declare that the article has been prepared without the use of AI tools.

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