



## INTERNATIONAL JOURNAL OF HUMAN RIGHTS LAW REVIEW

*An International Open Access Double Blind Peer Reviewed, Referred Journal*

---

Volume 5 | Issue 3 | 2026

Art. 16

---

# Ethnic Violence and the Failure of Criminal Justice: Analysing State Inaction in the 2023 Manipur Violence

Garima Thakur

*LLM Scholar,*

*Damodaram Sanjivayya National Law University, Visakhapatnam*

---

### Recommended Citation

Garima Thakur, *Ethnic Violence and the Failure of Criminal Justice: Analysing State Inaction in the 2023 Manipur Violence*, 5 IJHRLR 244-257 (2026).

Available at [www.humanrightlawreview.in/current-issues/](http://www.humanrightlawreview.in/current-issues/).

This Article is brought to you for free and open access by the International Journal of Human Rights Law Review by an authorized Lex Assisto & Co. administrator.

For more information,  
please contact [humanrightlawreview@gmail.com](mailto:humanrightlawreview@gmail.com)

---

# Ethnic Violence and the Failure of Criminal Justice: Analysing State Inaction in the 2023 Manipur Violence

## ABSTRACT

*This paper examines the 2023 ethnic violence in Manipur as a case study to analyse the failure of criminal justice in conflict situations. Triggered by disputes over identity, land, and political representation between the Meitei and Kuki-Zo communities, the violence resulted in killings, sexual atrocities, displacement, and large-scale destruction. The study argues that the crisis reflects not merely administrative lapses but a structural collapse of criminal justice, marked by delayed state response, compromised investigations, and lack of accountability. It further highlights how such institutional failures have led to continuing human rights violations, particularly affecting vulnerable populations. By analysing both the events of 2023 and the continuing instability, the paper concludes that restoring justice requires systemic reforms, accountability mechanisms, and a shift towards a victim-centric human rights framework.*

## KEYWORDS

*Ethnic Violence, Manipur Violence 2023, Criminal Justice System, State Inaction, Institutional Failure, Human Rights Violations, Ethnic Conflict, Meitei Community, Kuki-Zo Community, Rule of Law.*

## INTRODUCTION

The outbreak of ethnic violence in Manipur in May 2023 between the Meitei and Kuki-Zo communities represents one of the most serious internal conflicts in contemporary India. Initially triggered by tensions over the demand for Scheduled Tribe status and competing claims over land and resources, the situation rapidly deteriorated into widespread violence. Incidents of killings, sexual assault, arson, and the destruction of entire villages led to large-scale displacement, forcing thousands of individuals into relief camps and disrupting the social fabric of the region.<sup>1</sup>

Although Manipur has historically experienced ethnic and political tensions, the scale, intensity, and prolonged nature of the 2023 violence

---

<sup>1</sup> Office of the United Nations High Commissioner for Human Rights, *India: UN Experts Alarmed by Violence in Manipur* (July 2023).

revealed a far deeper institutional crisis. The state machinery appeared unable or in certain instances, unwilling to effectively prevent the outbreak of violence, control its escalation, or ensure accountability in its aftermath. Reports of delayed police response, failure to promptly register First Information Reports (FIRs), inadequate investigation, and allegations of bias further weakened public confidence in law enforcement agencies.<sup>2</sup>

This situation raises fundamental questions about the role and efficacy of the criminal justice system in conflict situations. Criminal justice is not limited to punishing offenders; it encompasses the state's obligation to protect life, maintain public order, ensure equal protection of laws, and provide remedies to victims.<sup>3</sup> In Manipur, each of these functions appeared significantly compromised. The inability to safeguard civilians, particularly vulnerable groups such as women and minorities, points to a breakdown of constitutional guarantees, especially the right to life and dignity under Article 21.<sup>4</sup>

Furthermore, the persistence of violence and the absence of swift accountability contributed to a climate of impunity, where perpetrators operated with little fear of legal consequences. This not only intensified the ongoing conflict but also deepened mistrust between communities and the state.<sup>5</sup> As a result, the crisis in Manipur cannot be understood merely as an episode of ethnic unrest; rather, it reflects a systemic failure of governance where the criminal justice framework itself becomes ineffective.

Against this backdrop, this paper examines whether the events in Manipur signify a structural collapse of criminal justice. It seeks to analyse how state inaction, institutional weaknesses, and socio-political complexities have contributed to widespread human rights violations, and how individuals caught between violence and institutional failure bear the brunt of this collapse.

## REVIEW OF LITERATURE

The existing literature on the 2023 ethnic violence in Manipur draws from a diverse range of sources, including policy reports, academic

---

<sup>2</sup> Human Rights Watch, "India: Investigate Abuses in Manipur Violence" (Aug. 2023); see also Editorial, *Manipur Violence and State Failure*, 58 *Econ. & Pol. Wkly.* 10 (2023).

<sup>3</sup> Andrew Ashworth & Mike Redmayne, *The Criminal Process* 1-5 (5th ed. 2010).

<sup>4</sup> *Maneka Gandhi v. Union of India*, (1978) 1 S.C.C. 248; see also Upendra Baxi, *The Future of Human Rights* 73-78 (3d ed. 2008).

<sup>5</sup> *Extra Judicial Execution Victim Families Association v. Union of India*, (2016) 14 S.C.C. 536; Amnesty International, *Denied: Failures in Accountability for Human Rights Violations by Security Forces in India* (2015).

scholarship, books, and journalistic analyses, which together provide a comprehensive understanding of the conflict and its implications for criminal justice and human rights.

Scholarly and policy-oriented works such as the report "*Finding a Way Out of the Festering Conflict in India's Manipur*" by the International Crisis Group, along with reports by Human Rights Watch and Amnesty International, contribute significantly to understanding the structural nature of the conflict. These works emphasise that the violence is rooted in long-standing tensions over ethnicity, land, and political representation, thereby framing the crisis as systemic rather than episodic.<sup>6</sup>

Journalistic sources such as BBC News, The Hindu, The Economic and Political Weekly, and Al Jazeera provide detailed accounts of the events, capturing both the immediacy of the violence and its evolving nature. Their contributions lie in documenting ground realities, highlighting state response, and bringing national and international attention to human rights concerns.

From a legal and theoretical perspective, works such as Andrew Ashworth and Mike Redmayne's *The Criminal Process* and Upendra Baxi's *The Future of Human Rights* offer foundational insights into the role of criminal justice systems and the state's obligation to protect rights. These are complemented by victimology scholarship such as Andrew Karmen's *Crime Victims: An Introduction to Victimology*, which broadens the analysis by focusing on the experiences of victims beyond formal legal recognition.

Interdisciplinary articles, including discussions on identity and violence in platforms like JSTOR Daily and psychological studies published through the National Library of Medicine and SAGE journals, contribute by highlighting the socio-psychological dimensions of conflict, particularly trauma, displacement, and gendered violence. These works expand the scope of analysis from legal violations to lived experiences of affected populations.<sup>7</sup>

Collectively, this body of literature reveals a consistent theme: despite the presence of a robust constitutional and legal framework, there exists a significant gap between law and its enforcement. The combined contributions of these sources demonstrate that the Manipur conflict is best understood as a structural crisis involving the convergence of ethnic tensions, governance failures, and the erosion of criminal justice

---

<sup>6</sup> Int'l Crisis Grp., *Finding a Way Out of the Festering Conflict in India's Manipur*, Report No. 346 (2023).

<sup>7</sup> *Identity and Violence in Manipur, India*, JSTOR Daily (2023).

mechanisms, thereby justifying the present study's focus on state inaction and human rights violations.

## BACKGROUND OF THE 2023 MANIPUR VIOLENCE

### *Immediate Causes*

The outbreak of violence in Manipur can be traced to a "Tribal Solidarity March" organised by tribal groups to oppose the demand of the Meitei community for inclusion in the Scheduled Tribe (ST) category. The issue of ST status is closely linked to access to land, political representation, and affirmative action benefits, making it highly sensitive in a region already marked by ethnic divisions.<sup>8</sup>

What began as a protest reflecting long-standing grievances soon escalated into violent confrontations between the Meitei and Kuki-Zo communities. Pre-existing tensions over identity, territorial control, and resource distribution intensified the situation, allowing the conflict to spread rapidly across districts.<sup>9</sup>

### *Scale and Nature of Violence*

The violence that followed was both widespread and severe, reflecting not only spontaneous clashes but also organised and targeted attacks. Reports indicated that hundreds of individuals lost their lives, while thousands were displaced from their homes and forced into relief camps under difficult conditions. Entire villages were set on fire, properties destroyed, and communities segregated along ethnic lines, fundamentally altering the social landscape of the region.<sup>10</sup>

A particularly disturbing aspect of the violence was the prevalence of mob brutality, including incidents of lynching and sexual violence. The circulation of a video showing women being paraded naked and assaulted became a defining moment of the crisis. It highlighted the extreme vulnerability of civilians especially women and symbolised the complete breakdown of law and order.<sup>11</sup>

This incident not only sparked nationwide outrage but also drew international attention, raising serious concerns about the protection of human rights and the effectiveness of state institutions in responding to

---

<sup>8</sup> *Manipur violence: What is happening and why?*, BBC News (July 20, 2023).

<sup>9</sup> *Finding a Way Out of the Festering Conflict in India's Manipur*, Int'l Crisis Grp., Report No. 346 (2023).

<sup>10</sup> *Manipur Violence – Causes and Implications*, Next IAS (2023).

<sup>11</sup> *Cycle of Violence in Manipur: The Persistence of Hostilities*, The Hindu (Editorial, 2024).

such grave violations.<sup>12</sup>

### CONCEPTUAL FRAMEWORK: CRIMINAL JUSTICE AND STATE RESPONSIBILITY

Criminal justice is not limited to punishing offenders; it is a comprehensive system aimed at maintaining social order, protecting rights, and ensuring accountability. It operates through three essential pillars: prevention of crime, investigation and prosecution, and protection of victims. In a constitutional democracy, these functions are closely tied to the state's obligation to uphold fundamental rights, particularly equality before law, freedom, and the right to life and dignity.<sup>13</sup>

In the context of Manipur, the 2023 violence demonstrates a simultaneous breakdown of all these pillars. The failure to anticipate and prevent violence, coupled with ineffective investigation and lack of victim protection, reflects a deeper institutional crisis. When the state is unable to perform these core functions, criminal justice ceases to operate as a system of protection and instead becomes symbolic, leaving individuals exposed to unchecked violence.

### LEGAL FRAMEWORK AND APPLICABLE PROVISIONS

The analysis of the 2023 violence in Manipur is situated within a comprehensive legal framework comprising constitutional guarantees, criminal law provisions, judicial precedents, and international human rights standards. At the constitutional level, Articles 14, 19, and 21 form the core, ensuring equality before law, protection of freedoms, and the right to life and dignity. Judicial interpretation, particularly in *Maneka Gandhi v. Union of India*, has expanded Article 21 to impose a positive obligation on the state to safeguard individuals from harm.

The statutory framework is primarily governed by the *The Bharatiya Nyaya Sanhita (BNS)*<sup>14</sup> and *Bharatiya Nagarik Suraksha Sanhita (BNSS)*<sup>15</sup> which criminalise acts such as murder, sexual violence, and rioting, and mandate procedural safeguards including registration of FIRs and fair investigation. The principle of mandatory FIR registration, as affirmed in *Lalita Kumari v. Government of Uttar Pradesh*<sup>16</sup>, is particularly relevant in assessing procedural lapses during the conflict.

Further, judicial oversight through cases such as *Extra Judicial Execution*

---

<sup>12</sup> Supra note 6.

<sup>13</sup> Supra note 3.

<sup>14</sup> *Bharatiya Nyaya Sanhita*, 2023, No. 43, Acts of Parliament, 2023 (India).

<sup>15</sup> *Bharatiya Nagarik Suraksha Sanhita*, 2023, No. 46, Acts of Parliament, 2023 (India).

<sup>16</sup> *Lalita Kumari v. Government of Uttar Pradesh*, (2014) 2 S.C.C. 1

Victim Families Association v. Union of India<sup>17</sup> reinforces that even in conflict situations, the rule of law and accountability cannot be suspended. Complementing domestic law, international human rights instruments such as the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights<sup>18</sup> emphasise the state's obligation to protect life, dignity, and provide effective remedies.

Together, these legal provisions establish a robust normative framework; however, the situation in Manipur demonstrates a significant gap between legal guarantees and their practical enforcement, ultimately contributing to the erosion of criminal justice and violation of human rights.

## STATE INACTION AND INSTITUTIONAL FAILURE

### *Delayed Response and Failure to Prevent Violence*

A key indicator of state failure lies in its inability to act preventively. Despite clear signs of escalating tensions, timely measures such as strategic deployment of forces and community-level intervention were inadequate. The reliance on curfews and internet shutdowns after violence had already intensified reflects a reactive governance approach.

This delay not only allowed violence to spread geographically but also signalled a lack of administrative preparedness, thereby weakening public confidence in the state's ability to maintain order.

### *Police Complicity and Breakdown of Neutrality*

The neutrality of law enforcement is central to criminal justice. However, in Manipur, allegations of police inaction, delayed FIR registration, and perceived ethnic bias raised serious concerns. In certain instances, the police were seen as ineffective in controlling mobs, while in others, their neutrality was questioned.

Such developments erode the foundational principle that the law applies equally to all. When law enforcement agencies are perceived as partial or inactive, the legitimacy of the entire criminal justice system is compromised, encouraging further lawlessness.

### *Failure of Investigation and Prosecution*

The post-violence phase revealed significant weaknesses in investigative

---

<sup>17</sup> Supra note 5.

<sup>18</sup> Universal Declaration of Human Rights arts. 3, 8, G.A. Res. 217 (III) A (Dec. 10, 1948); International Covenant on Civil and Political Rights arts. 2, 6, Dec. 16, 1966, 999 U.N.T.S. 171.

and prosecutorial mechanisms. Delays in filing FIRs, lack of proper evidence collection, and slow arrests hindered the possibility of timely justice.<sup>19</sup>

The absence of swift and credible prosecution creates a culture where perpetrators do not fear legal consequences. This impunity not only denies justice to victims but also perpetuates cycles of violence, as accountability becomes uncertain or entirely absent.

## HUMAN RIGHTS VIOLATIONS

### *Right to Life and Personal Liberty (Article 21)*

The large-scale killings, destruction of property, and displacement represent direct violations of the right to life and personal liberty. More significantly, the failure of the state to prevent such acts or respond effectively transforms these into systemic or constructive violations of constitutional rights.<sup>20</sup>

This indicates that the right to life is not merely about protection from direct state action but also about the state's duty to safeguard individuals from foreseeable harm.<sup>21</sup>

### *Gendered Violence and Sexual Atrocities*

The use of sexual violence during the conflict highlights how women's bodies become sites of symbolic and strategic violence in ethnic clashes. Incidents of public humiliation and assault reflect not only individual crimes but also collective attempts to assert dominance and terrorise communities.<sup>22</sup>

The state's inability to prevent or respond adequately to such incidents reveals a profound failure in protecting gender justice and upholding human dignity.

### *Forced Displacement and Loss of Livelihood*

The displacement of thousands of individuals has long-term socio-economic consequences. Loss of homes, livelihoods, and access to essential services such as healthcare and education disrupts not only

---

<sup>19</sup> Lalita Kumari v. Government of Uttar Pradesh, (2014) 2 S.C.C. 1; Amnesty Int'l, *Denied: Failures in Accountability for Human Rights Violations by Security Forces in India* (2015).

<sup>20</sup> Supra note 4.

<sup>21</sup> Nilabati Behera v. State of Orissa, (1993) 2 S.C.C. 746.

<sup>22</sup> *Identity and Violence in Manipur, India*, JSTOR Daily (2023).

immediate survival but also future opportunities.<sup>23</sup>

This form of displacement effectively marginalises affected populations and raises serious concerns about the adequacy of state-led rehabilitation and reintegration measures.

### *Psychological Trauma and Collective Fear*

The impact of the violence extends beyond physical destruction to deep psychological harm. Continuous exposure to violence, loss, and insecurity creates long-term trauma and anxiety.<sup>24</sup>

Additionally, the breakdown of trust between communities fosters a climate of fear and division, making reconciliation and social rebuilding significantly more difficult.

## **COLLAPSE OF CRIMINAL JUSTICE SYSTEM**

### *From Rule of Law to Rule of Mob*

The shift from institutional control to mob dominance represents a fundamental breakdown of legal order. When individuals or groups engage in violence without immediate restraint or consequence, the authority of law is effectively replaced by the power of collective force.<sup>25</sup>

This transformation signals that the state has lost its monopoly over legitimate use of force, which is essential for maintaining rule of law.

### *Impunity and Lack of Accountability*

The failure to ensure timely arrests and prosecutions leads to a perception that crimes can be committed without consequences. This normalisation of violence strengthens cycles of retaliation and deepens social divisions.<sup>26</sup>

Impunity not only undermines justice for victims but also weakens institutional credibility, making future enforcement even more difficult.<sup>27</sup>

---

<sup>23</sup> *Manipur Violence and Displacement Crisis*, Next IAS (2023).

<sup>24</sup> *Psychological Impact of Conflict and Displacement*, Nat'l Libr. Med. (2024),

<sup>25</sup> A.V. Dicey, *Introduction to the Study of the Law of the Constitution* 183–205 (10th ed. 1959).

<sup>26</sup> Human Rights Watch, *India: Investigate Abuses in Manipur Violence* (Aug. 2023); see also Int'l Crisis Grp., *Finding a Way Out of the Festering Conflict in India's Manipur*, Report No. 346 (2023).

<sup>27</sup> Amnesty Int'l, *Denied: Failures in Accountability for Human Rights Violations by Security Forces in India* (2015).

### Judicial Intervention: Too Little, Too Late

The intervention of the Supreme Court of India, though significant, occurred after substantial damage had already been done. Judicial responses were largely reactive and focused on specific incidents rather than systemic reform.

This highlights the limitations of courts in addressing structural failures, particularly when executive and administrative mechanisms have already broken down.

## VICTIM-CENTRIC ANALYSIS

### *Invisible Victims*

The impact of conflict extends beyond officially recorded deaths and injuries. Women subjected to sexual violence, children deprived of education, and elderly individuals left without care represent categories of victims often excluded from mainstream discourse.

Recognising these invisible victims is essential for developing a more comprehensive understanding of justice.<sup>28</sup>

### *Loss of Trust in the State*

The inability of the state to provide protection and justice results in a profound loss of trust among citizens. For many, the state shifts from being a guarantor of rights to an ineffective or even complicit entity.

Such erosion of trust undermines democratic legitimacy and weakens the relationship between citizens and institutions.

### *Intersection of Ethnicity and Justice*

Justice delivery during the conflict appeared influenced by ethnic identities, leading to perceptions of selective enforcement. This raises concerns about equality before law and the fairness of legal processes.<sup>29</sup>

When justice is perceived as biased, it further alienates communities and exacerbates conflict.

## CURRENT DEVELOPMENTS IN THE MANIPUR CONFLICT

The situation in Manipur remains fragile and unresolved even in 2026, indicating that the violence of 2023 was not an isolated incident but the

---

<sup>28</sup> Andrew Karmen, *Crime Victims: An Introduction to Victimology* 3–12 (9th ed. 2015).

<sup>29</sup> India Const. art. 14; see also Upendra Baxi, *The Future of Human Rights* 73–78 (3d ed. 2008).

beginning of a prolonged conflict. While there have been intermittent periods of relative calm, recent developments show that tensions continue to resurface, often triggered by isolated incidents that quickly escalate into broader clashes.<sup>30</sup>

#### ***Recurring Violence and Fresh Clashes:***

Recent months have witnessed renewed incidents of violence, including targeted killings, attacks on civilians, and clashes between armed groups. These episodes demonstrate that peace has not been sustainably achieved and that the region continues to experience cycles of violence rather than resolution.<sup>31</sup>

#### ***Persistent Displacement and Humanitarian Concerns:***

A significant number of people remain displaced, living in relief camps with limited access to basic necessities such as healthcare, education, and employment. The inability of displaced populations to return to their homes reflects both ongoing insecurity and the absence of effective rehabilitation measures.<sup>32</sup>

#### ***Deepening Ethnic Segregation:***

The conflict has resulted in a near-complete geographical and social division between communities, with Meitei populations largely concentrated in the valley and Kuki-Zo communities in the hill areas. This segregation has reduced inter-community interaction and reinforced mutual distrust, making reconciliation increasingly difficult.<sup>33</sup>

#### ***Continuing Militarisation and Security Presence:***

The heavy deployment of security forces continues across the state, indicating that normal law-and-order mechanisms have not been restored. While such deployment may temporarily control violence, it does not address the underlying causes of the conflict.<sup>34</sup>

#### ***Weak Accountability and Justice Delivery:***

Despite the scale of violence, there has been limited progress in investigation and prosecution. The absence of visible accountability for perpetrators contributes to a sense of impunity, allowing violence to

---

<sup>30</sup> *Why is India's Manipur still in conflict?*, Al Jazeera (Apr. 22, 2026).

<sup>31</sup> *Fresh violence erupts in Manipur*, Daily Times (Apr. 2026).

<sup>32</sup> Int'l Crisis Grp., *Finding a Way Out of the Festering Conflict in India's Manipur*, Report No. 346 (2023),

<sup>33</sup> *Cycle of Violence in Manipur: The Persistence of Hostilities*, The Hindu (Editorial, 2024),

<sup>34</sup> Human Rights Watch, *India: Investigate Abuses in Manipur Violence* (Aug. 2023).

reoccur.<sup>35</sup>

### ***Political and Administrative Instability:***

Changes in political leadership and governance structures have further complicated the situation. The lack of consistent and decisive political intervention has hindered long-term peace-building efforts.

### ***Trigger-Based Escalation of Conflict:***

Minor incidents such as attacks on civilians or protests continue to act as flashpoints, rapidly escalating into wider violence. This reflects the underlying volatility of the situation, where tensions remain constantly high.<sup>36</sup>

### ***Analytical Observation***

These developments indicate that the conflict in Manipur has transitioned into a protracted and structural crisis, rather than a temporary disturbance. The persistence of violence, displacement, and institutional failure highlights the continuing breakdown of criminal justice mechanisms and the ongoing violation of human rights.

In essence, the current scenario demonstrates that without addressing root causes and ensuring accountability, the cycle of violence and injustice is likely to continue, further weakening the rule of law and democratic governance.

## **CRITICAL ANALYSIS**

The 2023 violence in Manipur exposes the inherent vulnerability of criminal justice systems operating within deeply divided and ethnically polarised societies. In such contexts, the effectiveness of legal institutions depends heavily on the ability of the state to act with neutrality and impartiality. However, competing political interests, identity-based loyalties, and social pressures often compromise this neutrality, leading to selective enforcement of law and uneven protection of rights.

In Manipur, the apparent failure of the state to respond promptly and decisively allowed violence to escalate, thereby weakening institutional authority. The delay in preventive action, coupled with inadequate investigation and prosecution, created a situation where justice was not only delayed but effectively denied. This is particularly significant because criminal justice systems derive their legitimacy from timely and

---

<sup>35</sup> *Manipur Political Developments and Governance Challenges*, The Economic Times (Apr. 2026).

<sup>36</sup> *Manipur unrest: protests and clashes*, The Times of India (Apr. 2026).

fair enforcement; once this credibility is eroded, restoring public trust becomes extremely difficult.<sup>37</sup>

Furthermore, the crisis illustrates that such failures are not isolated administrative lapses but reflect deeper structural weaknesses within governance and legal frameworks. The inability to ensure accountability, maintain law and order, and protect fundamental rights indicates a systemic breakdown where institutions fail to function as intended. Therefore, the Manipur violence must be understood not merely as an episode of ethnic conflict, but as evidence of a broader collapse of criminal justice in the face of social and political fragmentation.<sup>38</sup>

## RECOMMENDATIONS

### *Immediate Measures*

In the aftermath of large-scale violence in Manipur, immediate steps are essential to restore public confidence in the criminal justice system. Independent investigations must be initiated to ensure impartial fact-finding, free from local or political influence. The establishment of fast-track courts can facilitate timely adjudication of cases, particularly those involving serious human rights violations such as killings and sexual violence.

Additionally, effective witness and victim protection mechanisms are crucial, as fear of retaliation often prevents individuals from coming forward. Without such safeguards, the pursuit of justice remains incomplete and inaccessible.

### *Structural Reforms*

Beyond immediate responses, long-term reforms are necessary to address the systemic weaknesses revealed by the crisis. This includes comprehensive police reforms aimed at ensuring professionalism, neutrality, and accountability in law enforcement. Strengthening local governance institutions can also play a key role in conflict prevention by improving community engagement and early response mechanisms.

Further, the creation of transparent monitoring and oversight bodies is essential to ensure that state actions are subject to scrutiny. Such mechanisms can help prevent future lapses and reinforce institutional

---

<sup>37</sup> Supra note 18.

<sup>38</sup> Human Rights Watch, *India: Investigate Abuses in Manipur Violence* (Aug. 2023); Int'l Crisis Grp., *Finding a Way Out of the Festering Conflict in India's Manipur*, Report No. 346 (2023).

integrity.

### *Human Rights Framework*

A sustainable resolution requires a shift from a purely punitive model of justice to a victim-centric human rights framework. This involves recognising victims not only as recipients of compensation but as individuals entitled to dignity, rehabilitation, and long-term support.

Efforts must include psychological counselling, restoration of livelihoods, and reintegration of displaced communities. Moreover, inclusive peace-building initiatives that address underlying issues such as ethnic tensions, resource disputes, and social exclusion are necessary to prevent recurrence of violence and ensure lasting justice.

## CONCLUSION

The events in Manipur demonstrate how fragile criminal justice systems can become when the state fails to act in a timely, effective, and impartial manner. The 2023 violence reveals that once institutions lose their capacity to prevent harm, ensure accountability, and protect citizens, the rule of law is quickly replaced by fear, uncertainty, and disorder. In such situations, it is not merely legal structures that collapse, but the very trust that individuals place in the state as a guarantor of their rights.

The consequences of this breakdown are most acutely felt by ordinary people those who lose their homes, livelihoods, dignity, and sense of security. Human rights violations in such contexts are not isolated incidents but part of a broader systemic failure where justice becomes inaccessible or delayed to the point of denial.

Restoring criminal justice in such a scenario requires more than procedural or temporary reforms. It calls for a deeper commitment to constitutional values, particularly equality, dignity, and the rule of law. Ensuring accountability, rebuilding institutional credibility, and adopting a victim-centric approach to justice are essential steps toward restoring faith in governance. Without such sustained efforts, the promise of justice remains incomplete, and the cycle of violence and impunity risks continuing.