



ROLE OF SPECIAL INVESTIGATION AGENCIES IN CRIMINAL JUSTICE SYSTEMS: A COMPARATIVE STUDY WITH THE INDIA, U.K. AND U.S.A.

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ABSTRACT

“The purpose of this research was to compare and contrast the three countries' Special Investigation Agencies (SIAs) with respect to their functions, organisational structures, and operational effectiveness. Transnational organised crime, terrorism, and sophisticated financial fraud are hallmarks of modern crime, which is becoming more complex and calls for individualised responses from law enforcement. In order to confront these intricate criminal operations, specialised investigative agencies are formed with specific knowledge and power.

Critical investigative agencies are the subject of this study. These agencies include the following: the CBI, NIA, and ED in India; the SFO and NCA in the UK; and the FBI, DEA, and Secret Service in the US. This analysis highlights both the successes and the continuing difficulties within the systems analysed by examining the existing legal frameworks, variations in jurisdiction, and supervision mechanisms.

These organisations face obstacles like political meddling, a lack of funding, and a lack of jurisdiction, but the research shows that they are essential to their local criminal justice systems. The integrated investigation and prosecution framework used in the UK is used as an example of an optimal methodology in this study. Additionally, it suggests improvements to address oversight problems in the US and to strengthen the independence of India's investigative institutions. The importance of robust legal frameworks, continuous investment in technology, and global collaboration cannot be overstated in order to guarantee that SIAs adequately tackle the evolving nature of criminal threats while safeguarding civil liberties.”

Keywords – SIA, CBI, NIA, COFEPOSA,

1: INTRODUCTION

There is an increasing complexity to the modern crime scene, with the advent of sophisticated criminal operations that cut across borders and test the limits of current law enforcement systems. Traditional police frameworks are inadequate in the face of the complexity of global organised crime, terrorism, massive financial fraud, and ubiquitous cybercrime, which necessitates individualised responses. As a result of the ever-changing nature of the dangers, many countries have set up Special Investigation Agencies (SIAs) with the resources, personnel, and training to successfully combat these complex types of crime. The roles of specialised agencies in the criminal justice systems of three countries India, the UK, and the USA are compared and contrasted in this research. Definitions, purposes, structures, powers, efficacy, and legal frameworks governing these agencies' operations are the areas this analysis aims to explore. The purpose of this analysis is to shed light on the most pressing problems, highlight the most effective solutions, and deepen our comprehension of the crucial role these organisations play in contemporary law enforcement. This paper examines and compares the SIAs in these three well-known democracies using a comparative legal analysis framework that draws on legislative acts, official publications, academic literature, and publically available material. First, the essay will explain what SIAs are, and then it will give a detailed overview of important agencies in each country. The features will be compared in order to assess their efficacy and investigate the regulatory frameworks and supervision systems in place. The study will conclude with a summary of the results, highlighting successful strategies and pointing out possible ways that Special Investigation Agencies might be better integrated into their criminal justice systems.

2: DEFINING SPECIAL INVESTIGATION AGENCIES

When regular police forces are unable to adequately investigate certain types of crimes because of their complexity, gravity, or sensitivity, a new type of law enforcement organisation known as a Special Investigation Agency is formed. For cases that go beyond what regular law enforcement authorities can handle, a specialised body known as a Special Investigations Agency (SIA) can step in. The main goals of SIAs cover a lot of ground. Combating illegal actions that call for unique resources, in-depth expertise, or specialised knowledge is the main goal. Expertise in state-of-the-art cybercrime and

the use of sophisticated financial forensics to difficult fraud cases are all part of this. In addition, high-profile cases with significant implications for public confidence or national security are often investigated by Special Investigative Agencies (SIAs), guaranteeing a focused and competent approach to handling delicate matters. These organisations serve to provide impartial monitoring in some situations, such as investigations into allegations of police wrongdoing, where objectivity is paramount. In Ontario, the Special Investigations Unit (SIU) is responsible for conducting independent and comprehensive investigations into occurrences involving sexual assault, significant injuries, or deaths in order to maintain public trust in police services. This specific goal draws attention to the distinctive features of these institutions, which incorporate accountability measures inside law enforcement in addition to conventional crime investigation.

There is a great deal of variation in the operational jurisdiction of security intelligence agencies. Many groups operate on a national or federal level; some examples include “the Indian National Investigation Agency (NIA),” “the Central Bureau of Investigation (CBI),” and “the Federal Bureau of Investigation (FBI)” in the US. The formation of entities occurs at the regional or state level in response to specific needs within those areas. You may see examples of these kind of organisations in the SIU in Ontario and the State Bureaus of Investigations around the US. All police officers in the province, whether they are from the provincial, regional, or municipal level, are subject to the authority of the SIU. The types of crimes investigated by SIAs are diverse, but they often share characteristics such as complexity, seriousness, or sensitivity. Criminal acts cover a wide range of topics, including financial crimes such as massive fraud and money laundering. Cybercrime is also on the rise, which is a major concern. As important as it is to address terrorism and other threats to national security, organised criminal enterprises sometimes operate across more than one jurisdiction. Also, a crucial area of investigation is public corruption, particularly when it involves high-ranking officials. Particularly in cases involving allegations against law enforcement officials or cases that display a high level of complexity, Special Investigative Agencies (SIAs) may be tasked with investigating serious violent crimes like sexual assault and homicide. Investigating transnational crime and related dangers is the responsibility of Homeland Security Investigations (HSI), an American agency. Child exploitation, human trafficking, and financial fraud are some of the crimes that this organisation targets, as do criminal groups that profit from international trade, travel, and money.

Finally, in modern criminal justice systems, Special Investigation Agencies play a crucial role by providing a focused strategy to deal with the growing challenges posed by complex and serious criminal acts. The precise nature of these groups depends on the specifics of the situation, but what they do is focus on problems that require expertise, objectivity, or resources that regular police departments just don't have. Offences that violate public confidence or cause significant harm to society are often the ones that are targeted.

3: SPECIAL INVESTIGATION AGENCIES IN INDIA

Many prominent federal Special Investigation Agencies function within India's criminal justice system; these agencies are distinct from one another in terms of their missions and organisational structures. When it comes to fighting specific types of complex and serious crime, the CBI, the NIA, and the ED take front stage.

3.1 “Central Bureau of Investigation (CBI)”

Although “the Central Bureau of Investigation (CBI)” did not originate from a specific statute, it did have its origins in a 1963 resolution passed by the Indian government. The terms of “the 1946 Delhi Special Police Establishment (DSPE) Act” derive the jurisdiction of the CBI. Its power is contingent and could be influenced by politics because this institution is not statutory. Crimes including corruption, economic crimes, and targeted acts of violence like terrorism, bombings, and kidnapping are all part of the CBI's purview. Usually, the Supreme Court or a high court may issue a direction or the state government will request that an investigation be launched. In order to facilitate international investigative activities, the institution serves as the principal coordinating body for Interpol. An important limitation of “the Central Bureau of Investigation (CBI)” is that it needs the approval of each state before it may expand its investigations outside Union Territories. This means that it may not be as effective in other jurisdictions. The head of the Central Bureau of Investigations (CBI) is an IPS officer with the rank of Director General of Police, who serves as the director of the agency. Following recommendations from a committee comprising the Prime Minister, the Leader of the Opposition, and the Chief Justice of India or their chosen representative, the Central Government carries out the appointment of this Director. Despite aiming for independence, this structure shows how much of an impact the federal government has. Within the Ministry of Personnel, the Department of Personnel provides administrative oversight, and the agency operates within that framework. In the end, the agency is positioned under the aegis of the Prime Minister's Office. There are several different types of cases that the Central Bureau of Investigation pursues. Smuggling, cybercrime, financial scams, bank frauds, and anti-corruption campaigns aimed at public officials are all part of this category. Terrorism, bombings, and kidnappings are some of the particular crimes that the agency also deals with.

3.2. “National Investigation Agency (NIA)”

Following the terrorist attacks in Mumbai on November 26, 2008, “the National Investigation Agency (NIA)” was established under the National Investigation Agency Act of 2008 in revenge. Enforcement of laws pertaining to counter-terrorism is its principal concern. With its concurrent jurisdiction and legislative authority, “the National Investigation Agency (NIA)” can investigate terrorist acts anywhere in India without obtaining permission from the government. If an offence threatens India's sovereignty, security, or integrity, “the National Investigation Agency (NIA)” can investigate and bring charges against the perpetrator. Protecting the safety of the state, fostering friendly ties with other countries, and dealing with infractions of laws put in place to meet treaty obligations are all part of its remit. To emphasise the global nature of terrorism, it is worth noting that the National Investigation Agency (NIA) has the power to probe scheduled offences that happen outside of India's borders. The agency is headed by a Director General, who is an officer of the Indian Police Service (IPS) and is appointed by the Central Government. He or she holds the title of Director

General of Police. With its main office in New Delhi, the National Investigation Agency (NIA) has a nationwide presence thanks to its network of zonal and branch offices spread out across the country. State Police Services (SPS), Central Armed Police Forces (CAPF), Indian Revenue Service (IRS), and Indian Police Service (IPS) are among the branches that depute senior personnel for employment. Crimes including cyber terrorism, human trafficking, counterfeiting of Indian currency, terrorism financing, and violations of specific laws like the Anti-Hijacking Act and the Explosive Substances Act are all investigated by the National Investigation Agency (NIA). The investigation of instances involving the funding of terrorism and counterfeit currencies is primarily carried out by the agency.

3.3. “Enforcement Directorate (ED)”

Among the many economic laws that the Enforcement Directorate (ED) has been responsible for enforcing since its 1956 inception are “the Fugitive Economic Offenders Act of 2018 (FEOA),” “the Foreign Exchange Management Act of 1999 (FEMA),” and “the Prevention of Money Laundering Act of 2002 (PMLA).” The Executive Directorate is an arm of the Ministry of Finance’s Department of Revenue. Money laundering investigations and the enforcement of infractions of foreign exchange laws constitute the core competencies of the organisation. “The Enforcement Directorate (ED)” is responsible for a number of important tasks, such as investigating assets associated with illicit proceeds, temporarily seizing assets, prosecuting offenders, and helping the Special Court confiscate assets. In order to combat economic crimes, the power to seize and levy assets is an essential tool. A Director, who is also appointed as an Additional Secretary to the Government of India, heads the agency. On the basis of recommendations made by a committee consisting of the Central Vigilance Commissioner, Vigilance Commissioners, and Secretaries from the Ministries of Home Affairs, Personnel, and Finance, the Central Government appoints the Director. The vast national reach of the Enforcement Directorate’s (ED) operational framework is demonstrated by the huge network of regional and zonal offices scattered throughout India, through which the ED functions. Cases involving money laundering, foreign currency rules, and “the Fugitive Economic Offenders Act” are among those investigated by the Enforcement Directorate (ED). Also, “COFEPOSA, the Conservation of Foreign Exchange and Prevention of Smuggling Activities Act of 1974,” designates the ED as a sponsoring agency. The Enforcement Directorate (ED) cannot launch investigations without first receiving a written complaint from another agency or law enforcement. This is to emphasise that the ED does not have the authority to act unilaterally.

4: EQUIVALENT AGENCIES IN THE UNITED KINGDOM

Within the larger framework of the criminal justice system, the United Kingdom employs a number of separate agencies to deal with complex and serious criminal activity. Notable entities in this area include “the Serious Fraud Office (SFO),” “the National Crime Agency (NCA),” the Criminal Investigations Capability of “HM Revenue and Customs (HMRC),” and “the Financial Conduct Authority (FCA).”

4.1. “Serious Fraud Office (SFO)”

When it comes to fighting complex financial crimes in the UK, “the Serious Fraud Office (SFO)” is an essential agency. Its principal goal is to ensure victims receive justice while the country maintains its reputation as a safe place for businesses to operate. England, Wales, and Northern Ireland’s significant Fraud Office (SFO) investigates and prosecutes cases of complex or significant fraud, bribery, and corruption. The SFO was founded under the Criminal Justice Act of 1987. According to Section 2 of the Act, the SFO has a lot of power, including the ability to order companies and people to provide documents and information that are relevant to an investigation. In some cases, this power can be used before an official investigation has even begun. “The Serious Fraud Office (SFO)” has the power to enter into Deferred Prosecution Agreements (DPAs) with corporations, offering a substitute for conventional prosecution overseen by the courts, and it is responsible for enforcing the Bribery Act of 2010. With the passage of the Economic Crime and Corporate Transparency Act 2023, the SFO’s pre-investigative powers were greatly expanded. A non-ministerial government organisation, the Serious Fraud Office is headed by a Director and is controlled by the Attorney General. Under a unique system that includes both investigation and prosecution of crimes, the Serious Fraud Office (SFO) in the UK works. Using this method, interdisciplinary teams consisting of investigators, solicitors and forensic accountants are assembled right from the start of the case handling process. The name given to this operational model is the “Roskill model.”

4.2. “National Crime Agency (NCA)”

With the primary goal of protecting the public from those involved in high-harm criminal activities, “the National Crime Agency (NCA)” serves as the major agency in the UK devoted to combating serious and organised crime. The 2013 Crime and Courts Act established the National Crime Agency (NCA), which is responsible for investigating various crimes. Crimes that transcend national and even regional borders include, but are not limited to, trafficking in humans, narcotics, weapons, cyberspace, and economics. Officers of the National Crime Agency (NCA) have the combined powers of a police constable, an immigration officer, and a customs officer, which is a notable feature of the agency. They have a wide range of enforcement skills thanks to this combination of powers. Despite having some operational autonomy, the National Crime Agency’s Director General is directly answerable to the Home Secretary and, by implication, to Parliament. The agency is structured into several commands, each of which deals with a different facet of organised crime. Among these are the following: Economic Crime, Organised Crime, Border Policing, and “the Child Exploitation and Online Protection (CEOP) Command.”

4.3. HM Revenue and Customs (HMRC)

When it comes to UK criminal investigations, HM Revenue and Customs (HMRC) plays a key role, particularly when it comes to matters of tax fraud, evasion, and income concealment as they pertain to indirect and direct taxes. When dealing with cases of serious deliberate deceit, concealment,

corruption, or conspiracy, HMRC chooses to pursue criminal prosecutions rather than civil fraud investigative procedures. An integral part of the government's plan to fight major and organised crime is the work of the HMRC. The department has the power to make arrests, get production orders for documents, apply for and execute search warrants.

4.4. Financial Conduct Authority (FCA)

It is within the jurisdiction of the Financial Conduct Authority (FCA) to investigate potential infractions of the rules and regulations it has set out to govern the financial services industry in the UK. The range of crimes covers a wide variety of conduct, including as insider trading, misleading statements and practices, breaking anti-money laundering laws, conducting financial operations without authorisation, and offering financial products or services without proper authorisation. To combat financial crime, the Financial Conduct Authority (FCA) has the authority to launch criminal charges. In addition, it can order businesses and people to provide information when it conducts investigations. Although the name "Office for Serious and Organised Crime" (OSOC) appears in a number of places, it is likely that it is either descriptive or out of date. The National Crime Agency (NCA) is the lead agency in this sector at the moment.

5: EQUIVALENT AGENCIES IN THE UNITED STATES OF AMERICA

A number of US federal and state authorities work together to execute a thorough plan for specialist criminal investigations. Notable federal agencies include the US Secret Service, the Drug Enforcement Administration (DEA), and the Federal Bureau of Investigation (FBI), each with its own distinct areas of duty. An important part of every state's structure is the State Bureaus of Investigation (SBIs).

5.1. Federal Bureau of Investigation (FBI)

On the domestic front, the Federal Bureau of Investigation (FBI) acts as a security and intelligence organisation in addition to being the principal federal law enforcement agency. Numerous duties essential to maintaining public and national safety fall under its expansive purview. A wide variety of federal offences can be investigated by the Federal Bureau of Investigations (FBI) due to its broad authority. Terrorism, cybercrime, counterintelligence, civil rights breaches, international organised crime, white-collar crime, violent crime, and over 200 other types of crimes are all part of this. The FBI's special agents are granted the right to carry firearms, serve warrants, and execute arrests by a number of federal legislation. Every ten years, the President appoints a new director to head the Federal Bureau of Investigations (FBI). Aside from the Director of National Intelligence, the agency is also answerable to the Attorney General. The organization's main office is in Washington, D.C., and it functions according to a hierarchical structure. With 56 field offices and almost 400 resident agencies, it has also made a significant national impact.

5.2. Drug Enforcement Administration (DEA)

Enforcement of federal regulations and laws pertaining to prohibited substances in the United States is primarily the responsibility of the Drug Enforcement Administration (DEA). Investigations into serious violations of controlled drugs laws, including those involving foreign operations, are carried out by the Drug Enforcement Administration (DEA). Established in 1973, the Drug implementation Administration (DEA) is responsible for the implementation of federal statutes pertaining to narcotics, including the Controlled Substances Act (CSA) and laws against money laundering and bulk currency smuggling. The President appoints the administrator, who runs the agency under the Department of Justice's structure. There is a vast network of local and foreign offices maintained by the Drug Enforcement Administration (DEA).

The United States Secret Service has two main responsibilities: protecting the country's financial system and national leaders. Protecting the president, vice president, and their families as well as other visiting heads of state is the primary responsibility of the Secret Service. On the other hand, it is essential for the investigation of crimes that endanger the financial system, including cybercrime, financial fraud, and counterfeiting. From its inception in 1865 to its current day of operation, the Secret Service has been subordinate to the DHS. It has the power to carry weapons, carry out warrant executions, and make arrests related to federal offences. A Director oversees the agency's operations, with the help of a team of special agents and a specialised Uniformed Division.

5.3. State Bureaus of Investigation (SBIs)

State Bureaus of Investigation (SBIs) are state-level investigative agencies that mostly look into criminal matters that are relevant to the state or involve more than one jurisdiction. While investigating a wide range of crimes defined by state law, entities of the State Bureau of Investigation (SBI) often provide technological support to local law enforcement. The state's attorney general or governor is usually the recipient of these agencies' findings reports. While they share some similarities with federal law enforcement agency, their authority is limited to the borders of their own states. A state's SBI might be structured as an independent agency or it can be a part of the state's larger public safety, justice, or police force.

6: COMPARATIVE ANALYSIS

This study compares and contrasts the Special Investigation Agencies in three countries: India, the UK, and the US. It looks at their respective functions, authority, organisational structure, jurisdictions, investigative approaches, and accountability mechanisms, as well as any similarities and differences.

Country	Agency	Legal Basis	Primary	Typical Jurisdiction	Key Powers	Oversight
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			Functions			Mechanisms
India	CBI	Executive Resolution, DSPE Act 1946	Corruption, serious crime	National (with state consent)	Acts as Interpol NCB, needs state consent	CVC (corruption), Parliament, Judiciary
India	NIA	NIA Act 2008	Counter-terrorism	National	Concurrent jurisdiction in terror cases, extraterritorial reach	Ministry of Home Affairs, Special Courts
India	ED	PMLA 2002, FEMA 1999, FEOA 2018	Economic offenses	National	Asset attachment, arrest in money laundering cases	Ministry of Finance, Special Courts
UK	SFO	Criminal Justice Act 1987	Complex fraud, bribery	England & Wales, Northern Ireland	Section 2 powers to compel info, DPAs	Attorney General, Parliament, HMCPSI
UK	NCA	Crime and Courts Act 2013	Serious & organized crime	UK-wide	Combined police, customs, immigration powers	Home Secretary, Parliament, IPCO
UK	HMRC	Various tax laws	Tax fraud, evasion	UK-wide	Search warrants, arrest for tax offenses	HM Treasury, Parliament, Judiciary
USA	FBI	Various federal statutes	Federal law enforcement, national security	Federal	Broad investigative powers, arrests, warrants	Attorney General/DoJ, Congress, Inspectors General
USA	DEA	Controlled Substances Act	Drug enforcement	Federal, International	Enforces drug laws, arrests, seizures	Attorney General/DoJ, Congress
USA	Secret Service	18 U.S.C. § 3056	Protection, financial crime	Federal, International	Protection of leaders, investigates financial crimes, arrests	Secretary of Homeland Security, Congress

Three nations' use of specialised agencies to tackle complicated criminal activities is studied in this study, along with the differences in their distribution and focus. The US and UK are more likely to use a decentralised approach, with different departments handling different types of crime. A more all-encompassing mission allows India's Central Bureau of Investigation (CBI) to investigate and prosecute a wide range of serious crimes. There is no federal law enforcement agency quite like the United States Secret Service. Its unusual dual mandate investigating financial crimes and protecting national leaders makes it stand out.

Significant differences exist in the powers bestowed upon these organisations. Performing forensic analysis, interviewing suspects, and conducting surveillance are all part of an agency's investigative skills. Unlike the constraints experienced by India's Central Bureau of inquiry (CBI), the Serious Fraud Office (SFO) in the United Kingdom has the considerable power under Section 2 to demand the production of documents before a formal inquiry is launched. Also, individual states in India do not need to give their agreement for the nationwide Investigation Agency (NIA) to investigate terrorism matters on a nationwide level. An important tool in the battle against economic crime is the Enforcement Directorate's power to seize and attach assets linked to money laundering.

The hierarchical architecture of the organisational structures seen in different countries is very similar, and they are all headed by appointees at the director level. However, different reporting lines reflect the different types of government in each country. There is a clear trend in the methods used in investigations towards relying more and more on complex technical developments like data analysis and AI. Judgemental review, internal monitoring, and external inspection by parliamentary institutions make up the accountability systems. Nevertheless, there is ongoing controversy over the level of autonomy and effectiveness of these institutions, particularly in relation to India's CBI and ED.

It is also clear that there are differences in jurisdiction. When it comes to terrorism-related offences, the National Investigation Agency (NIA) has national authority, while the Central Bureau of Investigations (CBI) in India needs state agreement, which is a unique limitation. The National Crime Agency (NCA) has jurisdiction over the whole country of the UK, in contrast to most UK agencies whose operational reach is limited to Northern Ireland, England, and Wales. State Bureaus of Investigations operate only inside their respective states' borders, but federal agencies in the US often have jurisdiction over the entire country. Judgemental constraints have limited the extraterritorial capabilities of the Serious Fraud Office (SFO), in contrast to the National Investigation Agency (NIA), which has specific authorisation to probe crimes that occur outside of India's boundaries.

7: EVALUATION OF EFFECTIVENESS

There has been great success and continuous criticism of the effectiveness of Special Investigation Agencies in India, the UK, and the US in combating sophisticated and serious criminal activity.

7.1. In India

The Indian government's top investigative agency, the Central Bureau of Investigation (CBI), has a long record of successfully prosecuting high-profile corruption and criminal cases. Conviction rates in terrorism cases have been quite high for the National Investigations Agency (NIA), which is a reflection of the agency's tailored approach to dealing with national security issues. The effectiveness of the Enforcement Directorate (ED) in seizing substantial assets in cases of money laundering highlights its role in disrupting financial criminal operations. Still, these bodies take a lot of heat for things like political meddling, lack of independence (especially for the CBI), lengthy investigation delays, and the need for state approval for the CBI to operate in some regions. Some have voiced serious worries about the possibility of human rights breaches occurring as a result of NIA investigations, calling into question the agency's constitutionality. In some jurisdictions, the Enforcement Directorate has recorded a relatively low conviction rate, which has brought them under criticism for alleged political misuse.

7.2. In United Kingdom (UK)

The Serious Fraud Office (SFO) in the UK has brought about convictions in high-profile, intricate fraud cases and levied hefty fines, such as the record-breaking penalty levied against Glencore. Numerous raids on criminal gangs, as well as the seizure of illicit narcotics and weapons, have been recorded by the National Crime Agency. When it comes to tax fraud, the HMRC has a very high conviction record, and the FCA has taken enforcement measures to deal with wrongdoing in the financial industry. But the Serious Fraud Office has been under fire for a number of reasons, including poor conviction rates in high-profile cases, ongoing problems with evidence disclosure, and ethical quandaries. Problems with funding, staffing levels, and the sheer scope of organised crime have been major roadblocks for the National Crime Agency. The HMRC has been under fire for what appears to be a decline in the amount of investigations carried out and complaints about the quality of customer care they provide. Many people are unhappy with the FCA's plans for the early disclosure of probes.

7.3. United States (USA)

When it comes to dealing with terrorism, espionage, and major criminal enterprises, the United States' Federal Bureau of Investigations (FBI) has a long history of success. Along with efforts to break up drug trafficking networks, the Drug Enforcement Administration (DEA) has recorded large seizures of illicit chemicals, notably fentanyl. When it comes to investigating financial crimes and protecting national leaders, the United States Secret Service has a solid track record. However, the FBI has been the target of criticism for its surveillance practices, handling of delicate cases, and alleged bias in both the past and the present. There have been multiple accusations of wrongdoing against the Drug Enforcement Administration (DEA), which has led to questions about its drug scheduling process and overall policies in the war on drugs. Due to multiple security breaches and cases of employee misbehaviour, the US Secret Service has been subject to further scrutiny. Problems in allocating resources and the need for effective cooperation with federal and local law enforcement agencies are common issues faced by state bureaus of investigation.

Country	Agency	Key Successes	Major Challenges/Criticisms
India	CBI	High conviction rate in major cases	Political interference, state consent issues, delays
India	NIA	High conviction rate in terror cases	Constitutional questions, human rights concerns
India	ED	Significant asset seizures in economic crimes	Allegations of political misuse, low conviction rates
UK	SFO	Convictions in complex fraud, large penalties	Low conviction rates in some cases, disclosure problems
UK	NCA	Disruption of organized crime, seizures	Funding, staffing, scale of organized crime
UK	HMRC	High conviction rate in tax fraud	Declining investigation numbers, customer service
USA	FBI	Counterterrorism, espionage, major crime	Historical controversies, surveillance practices
USA	DEA	Drug seizures, disruption of trafficking	Approach to drug scheduling, war on drugs criticism
USA	Secret Service	Protection of leaders, financial crime investigations	Security breaches, personnel misconduct

8: LEGAL FRAMEWORKS AND OVERSIGHT MECHANISMS

India, the UK, and the US all have their own distinct legal traditions and political structures, and it shows in the different legislative frameworks that govern Special Investigation Agencies. The Delhi Special Police Establishment Act of 1946 is the guiding document for the operations of India's Central Bureau of Investigation (CBI). Also, when it comes to cases of corruption, the Central Vigilance Commission (CVC) watches over it. Operating under the purview of the Ministry of Home Affairs, the National Investigation Agency (NIA) was founded in line with the provisions outlined in the National Investigation Agency Act of 2008. Compliance with the provisions of the Foreign Exchange Management Act of 1999 (FEMA), the Prevention of Money Laundering Act of 2002 (PMLA), and the Fugitive Economic Offenders Act of 2018 (FEOA) is the responsibility of the Enforcement Directorate (ED). It is the Ministry of Finance that oversees this organisation. Parliamentary oversight, judicial review by the Supreme Court and High Courts, and the supervisory authority of the Central Vigilance Commission (CVC) over the Central Bureau of Investigation (CBI) in corruption-related matters are all constituent parts of India's oversight mechanisms.

Under the supervision of the Attorney General, the Serious Fraud Office (SFO) was founded under the Criminal Justice Act of 1987 in the United Kingdom. In accordance with the guidelines laid out in the Crime and Courts Act 2013, the National Crime Agency (NCA) is responsible for carrying out its operations and is held to account by Parliament through the Home Secretary. While the Financial Conduct Authority (FCA) operates under the Financial Services and Markets Act 2000, HM Revenue and Customs (HMRC) derives its investigative authority from various tax statutes. Parliamentary committees, independent bodies like the Investigatory Powers Commissioner's Office (IPCO), which is in charge of monitoring government surveillance, and judicial review are all parts of the UK's oversight systems.

The power of the FBI in the US is decreed by multiple federal statutes, most notably Title 18 of the US Code and 28 U.S.C. § 533. The Controlled Substances Act (CSA) provides the framework within which the Drug Enforcement Administration (DEA) operates, whereas 18 U.S.C. § 3056 grants the authority to the United States Secret Service. Each state's legal framework dictates how the State Bureaus of Investigation (SBI) are governed. Judgemental review, several Inspectors General, congressional committees, the Department of Justice (which oversees agencies like the FBI and DEA), and the Department of Homeland Security (which is responsible for the Secret Service) all work together to facilitate the United States' oversight mechanisms.

For certain agencies, there are clear-cut legal limitations. Before beginning investigations into crimes that occurred inside a jurisdiction, the Central Bureau of Investigation (CBI) in India is required to acquire the agreement of the relevant state government. This restriction poses a substantial limitation that could impact the agency's operational efficiency. In order to obtain records held by foreign firms without a UK presence, the Serious Fraud Office must rely on mutual legal aid, as the bounds of its extraterritorial jurisdiction have been defined by the UK Supreme Court. In the US, the enormous investigative power of the Federal Bureau of Investigations (FBI) is limited by well-defined statutory constraints and constitutional safeguards.

9: CONCLUSION

Within the criminal judicial systems of India, the UK, and USA, Special Investigation Agencies play an increasingly important and substantial role. These specialised bodies are essential for the efficient handling of complex and serious crimes that jeopardise public trust, economic stability, and national security. The different legal and political systems in each country have an impact on the SIA landscape, which is revealed by this comparative research. A number of successful methods are exposed by this investigation. The United Kingdom's Serious Fraud Office is an excellent example of an organisation that has successfully adopted an integrated model for investigating and prosecuting financial crimes. This model has led to increased efficiency and a more thorough approach to dealing with complex financial crimes. Coordination of the UK's response to major and organised crime by the National Crime Agency demonstrates the usefulness of a centralised body in dealing with complicated and multidimensional dangers. The United States' Federal Bureau of Investigation (FBI) is able to tackle a wide range of criminal and national security challenges thanks to its extensive authority and ample resources. As an example of how a focused mandate and specialist training can provide positive results, consider India's National Investigation Agency (NIA). This agency has shown remarkable success in obtaining convictions in counter-terrorism cases. Strong asset recovery authorities are essential in combating economic crimes, as the Enforcement Directorate in India shows.

Still, there are places in every system where improvements could be useful. A major problem within the existing system of governance in India is the improvement of the Central Bureau of Investigation's (CBI) and Enforcement Directorate's (ED) autonomy and independence from political influence. Improving the Central Bureau of Investigation's (CBI) process for obtaining governmental approval for investigations might significantly boost its operating efficiency. It is critical to resolve the National Crime Agency's (NCA) budget constraints and guarantee that the Serious Fraud Office (SFO) can handle disclosure in complicated cases successfully in the UK. It is crucial that the public continues to have faith in HMRC investigations. The United States' decentralised system of federal and state agencies must be subject to consistent standards and oversight procedures. In addition, we must not ignore the present or the past when it comes to concerns about federal agencies' possible biases and surveillance methods. A lot of attention and investigation should go into these areas.

The ever-changing criminal landscape, with its increasingly intricate forms of cybercrime and financial fraud, the global reach of organised crime and terrorism, and the moral quandaries raised by the use of cutting-edge investigative technology, continues to present Security Intelligence Agencies across the globe with formidable obstacles. There may be a number of suggestions made to improve the efficiency and effectiveness of these organisations. The first step is to create a thorough legal framework that specifies the roles and responsibilities of all parties involved. In order to prevent the misuse of power and maintain public trust, it is crucial to establish thorough oversight systems that include both internal and external frameworks. The intricacies of modern crime necessitate constant funding for specialised training and cutting-edge technology capacities. Fourth, dealing with transnational threats, which often need coordinated actions across national borders, requires improved interagency and international cooperation. In the course of any investigation, it is critical to strike a delicate balance between the need for effective law enforcement and the basic protection of civil liberties and human rights.

Ultimately, modern criminal justice systems cannot function without Special Investigation Agencies. To safeguard national security, uphold the rule of law, and guarantee justice in an increasingly complex global setting, these bodies' specific functions are crucial. By comparing and contrasting successful strategies with the difficulties encountered, it becomes clear that these organisations can change and improve to meet the ever-changing demands of combating major and organised crime in the modern day.

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