



## **IDENTIFICATION PARADES: THE EVIDENTIARY VALUE & THE CREDIBILITY OF THE WITNESS IN IDENTIFYING SUSPECTS FOR CRIMINAL INVESTIGATIONS IN SRI LANKA**

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### **ABSTRACT**

*The term Identification does not only refer to Fingerprint Identification but also to voice identification, footprint identification and identification parades (Rajamanickam and Kung, 2017). However, the present paper focuses only on identification parades. According to the Oxford Learner's Dictionary, the term Identification Parade means "a row of people, including one person who is suspected of a crime, who are shown to a witness to see if he or she can recognize the suspect." (Oxford Learner's Dictionary, 2021). Identification parade is an important criminal investigation tool to catch the real perpetrator. When a person is suspected of committing a particular crime, that person is directed to an identification parade. In an identification parade, there is a line of people including the suspect who stands next to each other while the witness tries to recognize the person who has actually committed the crime. The research problem of this study is whether the evidence provided by the witness in an identification parade is actually accurate, or is there any credibility of the evidence provided by the witness in an identification parade. Also, the study explores the research question, does such evidence actually assist criminal investigations? This is an important question especially in the context of reported misidentifications in many jurisdictions at such identification parades. Therefore, this paper focuses on the evidentiary value of identification parades as it is one of the vital criminal tools in criminal investigations to catch the real offender. Also, it will elaborate on the procedure of identification parades conducted in Sri Lanka in order to make the public more enlightened on this subject. Further, the credibility of the witness on the identification of suspects in the eyes of the court will be discussed. This research was conducted through black letter approach and the critical analysis method. Also, the qualitative research method was used. Data were collected through primary and secondary sources. Primary sources consisted of national laws of Sri Lanka, and the secondary sources were the published books, e-journals, and e-books. One recommendation brought out by the study is that the police must be trained to use new techniques and should not contaminate the evidence obtained from IDPs. Also, updated information and knowledge about the proceedings must be given to the law enforcement officers. Additionally, government too has a responsibility to give facilities when conducting IDPs.*

**KEYWORDS:** *Evidentiary-Value, Credibility, Identification-Parades, Criminal Investigations*

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## **1. INTRODUCTION**

According to Rajamanickam & Kung, identification parade means “it is a line of people who stands together and the victim tries to recognize the person who has committed the crime.” (Rajamanickam and Kung, 2017). Identification of persons plays an important role in the criminal justice system. In a criminal trial, it is difficult to identify the real perpetrator. Sometimes not only the accused but also the victim needs to be identified. This identification of persons is basically determined on visual identification. In an identification parade, the witness will first identify the accused’s appearance and thereby recognize the person who was connected to the incident. In some instances, the witness can remember the name of the accused. In Sri Lanka, once a suspect is arrested, an identification parade must be held by the Magistrate or by an Attorney at Law nominated by him. An Identification Parade must be held in following instances such as when the witness is unaware of the name of the accused, or that the witness can recognize the particular accused who was connected with the incident.

The law with regard to identification parades was introduced by the English law to our system. In our law, the procedure of the identification parade is not specifically stated. In most other jurisdictions the identification parades are conducted by the police officers at the police stations. But in Sri Lanka, there is no any mechanism for a police officer to conduct an Identification parade. According to section 124 of the criminal procedure code, the magistrate must guide the police to conduct the identification parade. (Criminal Procedure code of Sri Lanka, 1979).

Not only the Magistrate and the police but also lawyers, prison officers and members of the court have a duty to conduct the identification parades carefully and responsibly. Generally, parade will be conducted in the court premises. Therefore, Identification parade (hereinafter this term will be used as IDP) plays a very important part of the investigation for the court to determine the credibility of witnesses on the point of identification. (Rajamanickam and Kung, 2017).

## **2. METHODOLOGY**

The study was conducted using the traditional black letter approach and the critical analysis method. Also, the Qualitative research method was used. Data were collected through primary and secondary sources. Primary sources consisted of national laws of Sri Lanka and India; especially from the Evidence Ordinance of Sri Lanka, Code of Criminal Procedure of Sri Lanka and the Indian Criminal Procedure Code. Secondary data were obtained from published books, e-databases, e-journals, e-books and theses and dissertations with special focus on definitions, history, issues, procedures, evidentiary values, case laws and application of the law etc. Validity of the data has been highly taken into consideration. Existing literature on the present topic is extremely sparse, in contrast to other jurisdictions, for which sufficient literature is available (Perera E.M.N, 2019).

## **3. DISCUSSIONS & FINDINGS**

### **3.1 The Procedure of identification parades in Sri Lanka**

First of all, the police officer must submit a report to the magistrate court by requesting to hold an Identification Parade. The witness must be kept outside the court premises and the witness cannot see how the suspects are taken inside the court premises for the identification parades. The magistrate has a duty to examine the prison bus where the suspects are kept for the IDP. Also, he/she must ensure that no outsider can see the suspect in the bus. And also, the windows of the bus must be properly covered. The necessary security must be provided for the bus.

Magistrate must order the police to select six persons to attend at IDP. These six persons must be selected from the public such as those people who came to the court for different purposes. When selecting those persons, police has a duty to ensure that those people have the same features like the suspect. It is essential to maintain the 6; 1 ratio. Magistrate has a duty to ensure that the court is fully covered before the IDP. And then, the Magistrate must order the police to bring the persons to the IDP from the general public. Next, the Magistrate must order the police to leave the

parade hall. Also, Magistrate must send a message through prison officers to bring the suspect from the prison bus by fully covering the suspect into the parade hall.

The doors of the Identification Parade Hall are closed once the suspect is taken inside the parade hall. Then the grab cover of the suspect must be removed by the prison officers. Details of the suspect must be handed over to the magistrate by the prison officers and then the magistrate must be satisfied that the particular suspect brought by the prison officers is relevant to this particular case. After that, the magistrate must order the prison officers to leave the parade hall.

The suspect has a right to change his hair, clothes, apparels and footwear. And also, he has a right to stand at any place among the other six persons who have been taken into the court for IDP. They should be in a standing position. There is no harm in giving a number to each person including the suspect who is taking part in the parade. The number should be clearly visible to the magistrate. And then, on the order of the Magistrate, witness should be brought inside the parade hall. The moment the message is conveyed and before the witness is brought to the door, the suspect is again entitled to change his clothes and position in the parade before the witness enters the hall. After the witness was taken inside the parade hall, the doors of the parade hall should be closed. Then the witness must establish and prove his identity to the Magistrate. The Magistrate must then be satisfied with the identity of the witness. Next, the Magistrate must inquire whether the witness could identify any perpetrator that was involved in the incident. The magistrate shall not put leading questions to the witness.

To understand the role and the behavior of the witness, the magistrate has a duty to go through the brief or the summary of the evidence when submitting the B report by the police. For instance, sometimes the witness only saw the suspect enter the gate of the house. Instead of reminding those details, the magistrate must merely pose a general question whether the witness could identify any person that was involved in the incident. Once the witness gives the

answer, he should be allowed to proceed along the parade where the 7 persons are standing. The witness should be told that he must touch the suspect and show to the magistrate if he has identified the suspect. Magistrate cannot force the witness if he cannot touch the suspect. In such an instance, the witness must use the number that is displayed on the garment of the person.

Before the witness enters the hall, his face and body can be covered. Or he could be kept at a covered place in the hall, and requested to identify the suspect from a distance. This type of a procedure is allowed under section 124 as amended. (Evidence Ordinance of Sri Lanka, 1988).

If a witness is brought in a covered position, the magistrate must ensure that he is the witness referred to in the B report and not anyone else. If the magistrate fails to take these precautions, the defense can make accusations later that under the guise of covering, a police officer had come to make the identification. If the witness identifies or recognize the suspect as the real perpetrator, the magistrate has a duty to ask to explain the acts done by that particular suspect with regard to that incident. Under that explanation, witness must explain where the suspect and the witness were when the incident was taking place. These precautions are taken with a view to elicit the evidence only from the mouth of the witness and not from the mouth of the magistrate.

Once the witness explains the incident and the role played by the suspect, the witness should be taken out of the hall. After that, once again, the suspect may be given an opportunity to change his appearance such as by changing his hair, dress, and shoes. He may be also given an opportunity to change the place where he stood at the parade. Then the other witness is called upon (witness number 2) to the court. Witnesses who have observed the parade should not be allowed to communicate with the witnesses who have not gone before the parade. The same procedure should be followed with the second witness. Parade can be held for any number of eye witnesses. Once the parade is over, the magistrate shall inquire from the suspect

whether he wishes to say anything about the conduct of the parade. If the suspect responds, the magistrate shall record the same.

During the IDP, no one can enter the parade hall and also no person inside the parade hall can leave the parade hall. Even the lawyers who are involved in the case cannot leave the parade hall before the conclusion of the IDP. And the lawyers who are not a party or not involved in the case cannot remain inside the parade hall. Even the law students and apprentices are also not allowed to remain inside the parade hall. Therefore, they may not get any experience as to how the parade was conducted. All the precautions are taken to minimize the leaking of information regarding the suspect to witnesses.

If the suspect or his lawyer object to hold the parade, then it should be recorded and the magistrate cannot abandon holding of a parade. Lawyers cannot cross examine the witness. Even the lawyer of the prosecution cannot ask questions from the witness during the IDP. But the prosecuting counsel can assist the magistrate if a request is made. For example, the prosecuting counsel may help the magistrate when formulating the question that should be put to the witness. Prosecuting counsel must assist to hold the parade in a fair manner so that neither party is prejudiced.

If a witness in his statement to the police stated that he had observed some special features like birth marks or cut marks on the face of the suspect, it would be very difficult to select such persons from the general public for the purpose of the parade. Therefore, a magistrate must take necessary precautions to cover such special feature from the face of the suspect and cover the same place of other persons who take part in the parade. This safeguard is taken in order to ensure that the witness identifies the suspect only through the features on the face and not due to any birth mark or any other special mark.

Once the witness points out the suspect, the magistrate should ask from the witness the role played by the suspect during the incident. The magistrate should not refresh the memory of the witness by reminding the

contents of the statement the witness had given to the police. At the trial, the Defense can mark contradictions on such utterances. If the magistrate had spoon-fed the witness at the parade in keeping with the statement to the police, at the trial, the defense may not be able to properly test the credibility of the witness. It also has to be borne in mind that no lengthy questioning is to be carried out at the parade. (Meezan, 2011)

### **3.2 Rights of parties in an Identification Parade**

When it comes to the rights of the suspects in an identification parade, according to the procedure of an IDP which was mentioned in the previous subtopic, the suspects have several rights in an identification parade as given below;

- The suspect has a right to change his hair, clothes, apparels and footwear.
- He has a right to stand at any place among the other six persons who have been taken into the court for an IDP.
- The suspect has a right to change his clothes again, and position in the parade before the witness enters the hall.
- Before the second witness is brought to the parade hall, once again the suspect has a right to change his appearance such as by changing his hair, dress, shoes and even has a right to change the place where he stood at the parade.
- After the parade, the judge must give an opportunity for the suspect to ask anything with regard to the conduct of the parade.
- The suspect and his lawyer can object to hold an IDP. Which means the suspect has the right to accept or refuse the request of an IDP.
- Also, the suspect has the right to know about the purpose of the parade.
- The suspect has the right to request the presence of his attorney at the IDP.

Apart from that, Article 13(3) of the Constitution of Sri Lanka states that “any person charged with an offence shall be entitled to be heard, in person or by an

attorney-at-law, at a fair trial by a competent court” (Constitution of Sri Lanka, 1978) because in Article 13 (5) of the Constitution of Sri Lanka states that “every person shall be presumed innocent until he is proved guilty.” (Constitution of Sri Lanka, 1978)

When it comes to the rights of the witness in an IDP, it can be highlighted as follows;

- Magistrate cannot force the witness if he cannot touch the suspect. Therefore, witness has the right to point out the suspect by the number displayed on the suspect.
- Witness has the right to take time when making his identification.

### **3.3 The Evidentiary Value of the Identification Parades**

In the procedure of Identification Parade, Magistrate will ask questions from two witnesses, rather than from one. Then, if both the witnesses are saying the same thing such as “this is the person I saw in the incident”, and pointed out the same person, then that is a reliable evidence. And that is why in an identification parade, the evidence will be taken from two witnesses. Therefore, identification parade is a reliable method of collecting evidence. It will be fair for both the suspect and the witness.

Another finding is that, throughout the identification parade procedure there is a strict procedure by not allowing the people who are not a party to the case to enter the parade hall. Even the lawyers who are not a party to the case would not be permitted and also the law students, apprentice cannot be in the parade hall. Most scholars have stated that it is a huge disadvantage to them because they don’t get an opportunity to learn something as future legal practitioners. But some scholars have mentioned that it is good to have such restrictions to protect the confidential information about the suspect because that person is still a suspect of the incident and not an offender.

Some scholars have mentioned that the suspect should not be covered when he is taken to the parade hall, and the face of the suspect must be shown to the general

public. According to the law, the suspect is considered innocent until proven guilty. For instance, think that ‘A’ was arrested as a suspect of a murder but that suspect is not the actual killer. Therefore, it can be clearly seen that if the suspect ‘A’ is taken to the parade hall without covering him, the general public might think that he is the real perpetrator of the murder and after the case that suspect cannot face society. Also, there might be a miscarriage of justice and it will lead to a wrongful conviction.

Through the identification parade procedure, the suspect is given an opportunity to change his appearance. Even if there was any mark on the suspect’s face when the incident happened, the suspect is given a chance to cover that mark. So, this literally means that, only a witness of strong evidence can recognize the suspect even that particular suspect covers the mark of his face. For instance, think that suspect ‘B’ killed ‘C’ and that particular suspect has a mark on his face. Think that during the identification parade that particular suspect covered that mark; but if the witness has a strong memory of that day’s incident of the murder, even though the suspect covers his mark, that witness can recognize him. According to that, it will be a strong evidence because if the witness could recognize the murderer without the mark but by his appearance, it will eventually become a reliable evidence in an identification parade.

Last but not least, posing questions to the witnesses again and again by the magistrate about the role played by the suspect will protect the suspect being wrongfully convicted. The reason is, out of seven people, the witness selects the accused by recalling the incident to his mind. If the witness chooses another person who is not the suspect, that evidence is not acceptable and it will be considered as the witness not recognizing the suspect or the witness being unable to recognize the suspect in the identification parade.

### **3.4 Application of Sri Lankan Case Laws and Provisions with regard to IDP**

According to Section 124 of the Criminal Procedure amended Act of Sri Lanka, “ Every Magistrate to whom application is made that behalf shall assist the conduct of an investigation by making and issuing appropriate orders and processes of court and may, in

particular hold, or authorize the holding of, an identification parade for the purpose of ascertaining the identity of the offender, and may for such purpose require a suspect or other person to participate in such parade, allow a witness to make his identification from a concealed portion and make or cause to be made a record of the proceedings of such parade."(Criminal Procedure Amended Act, 1988). This was discussed in the recent case of Mahanama Tillakeratne Vs Bandula Weerasinghe and Others (1999) 1 SLLR\_372. According to this case, under the provision of this section, police had been requested to arrest a suspect. That person was then produced to the CID for investigations before taking him to the court. According to the opinion of Weeraratne J, suspect could not be arrested under section 124. And also, he stated that, the suspect can be arrested according to the provisions of chapter v of the code and not according to section 124 of the code. He further stated that, a warrant for a suspect can be issued according to the evidence given on oath before a magistrate. Therefore, even though a magistrate is empowered to assist in the conducting of an IDP, he is not empowered to issue a warrant of arrest under this section and thereby overriding the requirements of chapter v of this code.

The case of Perera Vs the Republic (1969) 77 NLR 224: this is a case with regard to a murder which has been committed in the magazine prison. In this case, 11 prison guards were the suspects of causing the murder of a prisoner. 53 prison guards and 23 outsiders were lined up at the IDP. The ratio of guards to outsiders was 1:2. And this was criticized by the judge Walgampaya.

Also, in the case of Weeraratne Joseph Aloysius Vs AG (1992) 2 SLLR 265, justice Sarath Silva stated that in an IDP, the witness can be questioned with regard to that incident and also question about the role played by the suspect in that incident. There are no express provisions with regard to identification parades in Sri Lanka, but it should be conducted in a proper manner for the interests of the justice.

Section 9 of the Evidence Ordinance stated that, "Facts necessary to explain or introduce a fact in issue or relevant fact, or which support or rebut an inference suggested by a fact in issue or relevant fact, or which

establish the identity of anything or person whose identity is relevant, or fix the time or place at which any fact in issue or relevant fact happened, or which show the relation of parties by whom any such fact was transacted, are relevant in so far as they are necessary for that purpose." (Evidence Ordinance, 1896). The identification of person is logically relevant. Therefore, the suspect must be produced under section 9 of this ordinance when the witness identified the suspect at an IDP. But if the witness gives direct evidence, then there is no need of an IDP. Therefore, it can be stated that IDP is logically relevant as well as legally relevant too.

### **3.5 Application of Indian Case Laws and Provisions with regard to IDP**

Section 54A of the Indian Criminal Procedure Code states that the suspect should be sent for a test identification parade and this test identification parade means, when the victim had never seen the suspect in his life before the incident, then the suspect is produced before a test identification parade; but when both witness and the suspect are known to each other then there is no need to conduct a test identification. And the parade must be conducted as soon as possible due to the fact that the victim does not forget the details. (Gundu and Tirunagiri, 2020) This Indian procedure regarding identification parades is much similar to the Sri Lankan procedure.

An Indian case, Raju Manjhi v. State of Biharx 2018 SCC Online SC 778 stated that the test identification parade is no way a substantial evidence, but this test identification helps the investigation agencies. It means that this identification parade evidence helps the investigation process but this IDP evidence is not produced to the court as evidence. It is only produced for the investigation process. Gundu and Tirunagiri in their journal paper further stated that these kinds of identifications are needed to convict the suspect.

### **3.6 Credibility of the witness on the identification of the suspect**

When it comes to the credibility of witness, it can be stated that for instance, think that the witness gives

evidence at the trial that the suspect is dark in complexion and tall. But the witness in the statement to the police stated before that the suspect was fair in complexion and short. In this example it can be seen that there is a contradiction about the statements given by the witness. Therefore, this contradiction is important when concerning about the credibility of the witness. (Meezan, 2011)

In the celebrated case of *Rex Vs Turnbull (1977) QB 224*, following guidelines have been laid down for the judges to consider when evaluating the credibility of the witness on the identification of suspects.

- What is the duration/How long did the witness observe the suspect?
- At what distance did he (witness) see the suspect?
- What is the light that was available at the time of the incident?
- Are there any obstructions between the perpetrator and the witness?
- Had the witness seen the perpetrator in the past and recollected his features?
- How long after the incident did the witness identify the suspect at the parade?
- Whether there is any material discrepancy between the evidence given by the witness in court and his statement given to the police.

### **3.7 Issues relating to Identification Parades**

Existing research has proved that human mind cannot record incidents as a tape recorder. On the other hand, human mind is unable to recall incidents like a tape recorder and exactly as we see them. Therefore, it is important to preserve witness memory carefully and retrieve it methodically without giving any chance to contaminate it (Perera E.M.N, 2018). Mistaken eyewitness identification accounts for over three-quarters of wrongful convictions (Gould and Leo, 2010) and nearly 75 percent of the 250 convictions overturned by DNA evidence between 1989 and 2010 have been due to eyewitness misidentifications. (Bazelon, 2013). Eyewitness evidence is the main cause of wrongful conviction in the United States. It is essential to study the effect of eyewitness evidence on individual cases. (Morgan, 2014). There are many

factors that can affect the trustworthiness of an identification, mainly the simple weakness of human memory (Perera 2018).

## **4. RECOMMENDATIONS**

Therefore, it can be recommended that,

- Police must be trained to use new techniques and investigate cases without contaminating the evidence obtained from IDPs.
- Also, updated information and knowledge about the proceedings must be given to the law enforcement officers. Because officers who carry out the IDPs have a very little knowledge about this procedure (Rajamanickam and Kung, 2017). Dock identification is being applied together with identification parade to support the reliability of an identification.
- Additionally, government too has a responsibility to give facilities when conducting IDPs since the quality and the accuracy of the information obtained from the IDPs are based on the reliability of evidence.

These recommendations will help to get more accurate and credible evidence from the witness when identifying the suspect at IDPs.

## **5. CONCLUSIONS**

This study explained the term Identification parade, gave a brief introduction about Identification parades, explained the procedure followed in conducting an IDP, discussed the evidentiary value of IDPs, the application of the Sri Lankan case laws and provisions, the Indian case laws and provisions, the credibility of the witness when identifying the suspect at an IDP, some issues relating to IDPs, and finally gave the recommendations and conclusions. Therefore, by going through this research study and considering about the analysis of this study, it is evident that the identification parade is part and parcel of a criminal investigation. (Rajamanickam and Kung, 2017). By going through the analysis, it was revealed

that the IDP evidence plays an important role to catch the real offender and has an evidentiary value. If the identification parades are conducted according to the correct procedure, evidence obtained from the IDPs can be considered as credible and accurate.

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## **7. ABBREVIATIONS**

IDP– Identification Parade