

Internal and External Judicial Accountability Mechanism in Pakistan: A Balanced Approach

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Received: 06-11-2025	Revised: 23-11-2025	Accepted: 13-12-2025	Published: 23-12-2025
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ABSTRACT

In Pakistan, judicial accountability is one of the main issues of concern, especially because there is a need to reconcile judicial independence with the requirements of judicial transparency and the confidence of the public. This study will evaluate the framework of judicial accountability in Pakistan with particular attention given to the relationship between the internal disciplinary mechanisms of the courts and the demands for external supervision. Through an evaluation of the constitutional and legal bases of the superior and lower judiciary, including the Supreme Judicial Council (SJC) and the disciplinary systems controlled by the high courts, this study demonstrates that the prevailing national and international criticism of judicial accountability in Pakistan does not adequately consider Pakistan's constitutional spirit and the doctrine of separation of powers. Although it acknowledges several procedural shortcomings in the internal accountability processes of the judicial system such as the lack of clarity in these processes and the time taken in order to complete them, the study shows that external oversight of the judicial system in addition to stronger accountability may lead to the politicalization of the court and a loss of its independence. As a result of this research, it recommends that reforms should be made to the internal accountability processes of the judicial system in addition to the implementation of external control oversight upon the judicial system so as to provide a balanced form of accountability while preserving the constitutional autonomy of the judicial branch.

Keyword: *Judicial accountability, Judicial transparency, disciplinary mechanisms, courts, Supreme Judicial Council (SJC), Pakistan*

INTRODUCTION

Judicial accountability is an essential element of the rule of law which ensures that judges exercise authority responsibly while remaining insulated from improper influence. In Pakistan, this issue has acquired a renewed significance following the Human Rights Committee's (HRC) concluding observations. HRC criticises the judiciary's reliance on internal disciplinary mechanisms and express concern over the absence of external oversight. According to the HRC, institutions such as the Supreme Judicial Council (SJC) allegedly lack transparency and public confidence, thereby allowing judicial misconduct to remain concealed in Pakistan since centuries.

This critique, however, is becoming a push start for providing standards which sufficiently give a balanced approach for Pakistan's judicial architecture and the imperatives of judicial independence embedded with the external checks and balance. The prevailing assumption that external oversight inherently enhances accountability overlooks the risks of executive or political encroachment upon judicial functions. This article challenges that assumption and situates the debate within Pakistan's constitutional framework, arguing that internal judicial accountability, with some improvements, remains the most legally sound mechanism for regulating judicial conduct. The research identifies a critical gap between the criticism upon

internal accountability and the actual constitutional need for judicial independence, which this study seeks to address.

Problem Statement

Although Pakistan's ranking on the Corruption Perception Index (CPI) 2024 has been dropped by 2 points i.e., from 133 in 2023 to 135 in 2024 out of 180 countries (Transparency International, 2025), Pakistan is still snowed under with various reforms. The Human Rights Committee (HRC), in its concluding observations, has also criticised Pakistan's internal judicial disciplinary and anti-corruption mechanisms. According to the HRC, the judiciary's reliance on internal systems such as the Supreme Judicial Council creates an environment where judicial misconduct can remain hidden and where the public cannot trust the accountability (United Nations Human Rights Committee, 2024).

However, this criticism raises an important research problem: Is the HRC's assessment based on an accurate understanding of Pakistan's basic structure of constitution, and judicial independence? This article critically argues that a balanced integration of internal and external accountability is essential to safeguard judicial independence as well as transparency. The prevailing narrative assumes that external oversight automatically ensures transparency, but in reality, external control threatens the judicial independence, exposes judges to political pressure, and undermines the separation of powers (Radhanpurwala, Trivedi, and Pandya 2023). Nevertheless, the issues related to internal accountability mechanism is becoming an admitted fact. Therefore, the research problem arises from the gap between the criticism upon internal accountability and the actual constitutional need for judicial independence. This article seeks to demonstrate that there should be a balanced approach, and mechanism for judicial accountability.

LITERATURE REVIEW

Existing scholarship on judicial accountability in Pakistan reflects a deep divide between proponents of internal regulation and advocates of external oversight (Mangi, Magsi & Ali, 2025). Constitutional scholars emphasise that Article 209 of the Constitution establishes the Supreme Judicial Council as the exclusive forum for disciplining judges of the superior courts, deliberately insulating them from executive or legislative interference (Shah, 2009). Studies highlight that this structure safeguards judicial independence and preserves the separation of powers by preventing politically motivated accountability proceedings. (Ervin Jr., 1970).

Conversely, a significant body of literature criticises the internal accountability model for its institutional bias, secrecy, and inefficiency (Mahmood & Qureshi, 2023). Researchers argue that closed proceedings, limited disclosure of outcomes, and prolonged inquiries undermine public confidence and create perceptions of judicial self-protection (Tew, 2024). Empirical analyses further suggest that internal mechanisms lack specialised investigative capacity, particularly in cases involving financial or administrative corruption (Buscaglia, 2001).

With respect to the lower judiciary, scholars acknowledge the comparatively a better framework operating under the supervision of the Lahore High Court, including the Punjab Civil Servants (Efficiency & Discipline) Rules, 1999 (Ahmed & Hakim, n.d.), and the Civil Courts Ordinance, 1962 in the province of Punjab. Nevertheless, critiques persist regarding procedural delays and uneven enforcement of Rule of Law. Overall, the literature reveals a consensus on the necessity of accountability but diverges sharply on the appropriate institutional model, thereby underscoring the need for a balanced and context-sensitive analysis.

METHODOLOGY

This study employs a qualitative research methodology grounded in constitutional interpretation, statutory analysis, and critical review of secondary legal literature especially relevant articles. Primary sources include the Constitution of the Islamic Republic of Pakistan, relevant statutory instruments governing judicial discipline, and procedural rules of the Supreme Judicial Council and High Courts. Secondary sources consist of peer-reviewed journal articles, books, and policy-oriented legal scholarship addressing judicial accountability and independence.

The methodology further incorporates normative analysis by engaging with international human rights discourse, particularly the HRC's observations, and evaluating their compatibility of its observation with Pakistan's constitutional framework. By juxtaposing internal accountability mechanisms with arguments for external oversight, the study adopts a comparative and analytical approach aimed at assessing legal coherence, institutional effectiveness, and constitutional legitimacy by providing a balanced approach.

Framework of Judicial Accountability in Pakistan

Judicial accountability in Pakistan operates within a constitutionally sensitive framework that seeks to reconcile the imperatives of judicial independence with the necessity of institutional integrity and public confidence (Hussain, 2011). The Constitution of the Islamic Republic of Pakistan, 1973, envisages accountability primarily through internal mechanisms, while cautiously permitting limited external oversight to prevent arbitrariness, misconduct, or abuse of judicial authority. This framework is grounded in the principle that accountability must not translate into executive or political control, as such interference would undermine the separation of powers and erode the rule of law.

At the core of internal judicial accountability lies the Supreme Judicial Council (SJC) established under Article 209 of the Constitution, which is mandated to inquire into allegations of misconduct or incapacity of superior court judges (Yiling & Khan, 2022). The SJC mechanism reflects a self-regulatory model wherein senior members of the judiciary assess the conduct of their peers, thereby preserving decisional independence while enforcing ethical discipline (Shah & Iqbal, 2017). Complementing this constitutional body are informal internal controls, including codes of conduct, peer review, judicial performance evaluation through case management, and administrative oversight exercised by Chief Justices. However, these internal mechanisms have frequently been criticized for opacity, procedural delays, and limited public disclosure, which in turn raises concerns regarding their effectiveness and credibility (Amjid, Saeed & Jathol, 2025).

External judicial accountability in Pakistan is deliberately circumscribed and operates indirectly through constitutional, parliamentary, and societal checks rather than direct intervention in judicial functions. Parliamentary oversight is limited to constitutional amendments and budgetary control, while the executive's role is largely confined to administrative coordination without authority over judicial decision-making. Additionally, accountability through public scrutiny, media reporting, and academic critique plays an increasingly significant role in shaping judicial behaviour, although unregulated media trials pose risks of reputational harm and populist pressure. The superior courts' power of judicial review paradoxically functions both as an accountability tool over other state organs and as a domain that itself remains largely insulated from external review.

The balancing of internal and external accountability thus requires a calibrated approach that strengthens transparency and procedural rigor within existing judicial mechanisms while resisting encroachments that may compromise independence. Meaningful reform necessitates enhancing the credibility of the SJC

through clearer standards of misconduct, reasoned decisions, and limited public disclosure, alongside institutional safeguards against politicization. Ultimately, an effective framework of judicial accountability in Pakistan must rest upon constitutional fidelity, ethical self-regulation, and informed public oversight, ensuring that the judiciary remains both independent in adjudication and answerable in conduct. Following are the mechanism for accountability of the superior and lower judiciary in Pakistan;

Accountability of the Superior Judiciary in Pakistan

The accountability of Pakistan's superior judiciary operates through constitutional, institutional, and self-regulatory mechanisms that the Supreme Court and High Courts directly control. The Constitution establishes the Supreme Judicial Council (SJC) under Article 209 as the exclusive forum that investigates misconduct and incapacity of Judges of the Supreme Court and High Courts (Shah & Iqbal, 2017). The SJC initiates proceedings upon formal complaints, presidential references, or information received through verified sources. It conducts inquiries, records evidence, examines conduct, and recommends removal or other action when it finds a judge guilty of misconduct (Daudpota, 2019). The Council's constitutional authority shields judges from executive or parliamentary interference (Shaheen, 2025). Alongside the SJC, the superior courts maintain institutional accountability through internal supervisory powers: Chief Justices regulate rosters, monitor judgment quality, review case disposal rates, and enforce codes of conduct issued under the Oath of Office (Third Schedule) (Zia, Naseer & Dar, 2021). The High Courts exercise administrative control over the district judiciary under Article 203 and evaluate the conduct of subordinate judges through inspections, performance reports, and vigilance cells, thereby reinforcing the integrity of the judicial system. Superior courts also remain accountable through public reasoning in judgments, intra-court appeals, *Suo motu* scrutiny, and parliamentary oversight limited to financial audits and administrative expenditures. Although the framework ensures independence by insulating judges from external pressures, scholars consistently argue that the SJC's closed processes, limited transparency, and infrequent use have weakened public trust and hindered effective judicial discipline (Rizwan, 2023). This internalised model of accountability continues to invite debate on reforming the SJC's procedures, increasing transparency, and ensuring a more effective institutional framework for oversight of the superior judiciary.

Accountability Mechanism of the Lower Judiciary (Punjab)

The accountability framework of the lower judiciary in Punjab operates through an integrated set of statutory, administrative, and institutional controls that the Lahore High Court actively supervises. The Court enforces the Punjab Civil Servants (Efficiency & Discipline) Rules 1999 to discipline judicial officers for inefficiency, misconduct, corruption, or violations of judicial standards (Ahmed & Hakim, n.d.). The High Court initiates proceedings on the basis of complaints, inspection reports, vigilance findings, or discrepancies in performance data. It issues show-cause notices, appoints inquiry officers, evaluates evidence, and imposes penalties ranging from censure to dismissal. Simultaneously, the Director General (Judicial & Case Management) strengthens administrative accountability by monitoring case flow, disposal rates, pendency, and compliance with timelines. The DG conducts surprise inspections, processes complaints from litigants and bar members, and generates performance reports that feed directly into disciplinary scrutiny (Kassar, Kausar & Laghari, 2024). The Civil Courts Ordinance, 1962 reinforces institutional accountability by vesting supervisory authority in the Lahore High Court and assigning District & Sessions Judges the responsibility to inspect civil courts, prepare performance evaluations, and report irregularities (Hussain, 2011). The High Court Rules & Orders further institutionalise oversight by requiring annual confidential reports, judgment-quality reviews, adherence to procedural directives, and implementation of a structured transfer-and-posting policy. Together, these mechanisms enable the High Court to maintain transparency, discipline, and integrity within the district judiciary while preserving the constitutional principle of judicial independence.

PERSPECTIVES ON INTERNAL JUDICIAL ACCOUNTABILITY

To evaluate the effectiveness of internal disciplinary and anti-corruption mechanisms within Pakistan's judiciary, it is necessary to examine both the strengths and weaknesses of this institutional model. The debate centres on whether internal accountability truly protects judicial independence or whether it compromises transparency, impartiality, and public trust. On one hand, several arguments support the view that internal mechanisms strengthen autonomy, prevent political interference, and preserve professional standards within the courts. On the other hand, critics argue that these same mechanisms suffer from institutional bias, limited investigative capacity, and a lack of openness, which ultimately weakens genuine oversight. By analysing both perspectives, this discussion aims to present a balanced assessment of how internal accountability operates and whether it meets the constitutional promise of an independent and accountable judiciary. Therefore, following are divergent perspectives upon the accountability.

The Uneffectiveness of Internal Judicial Accountability Mechanisms

Internal mechanisms create an environment where judges hesitate to take strict action against member judges. When senior judges supervise the conduct of other judges, personal relationships, institutional loyalties, or professional courtesy influence the process (Agha & Naqvi, 2022). This risk of bias reduces the credibility of decisions and creates a perception that the judiciary protects its own members rather than enforcing genuine accountability (Mahmood & Qureshi, 2023). Moreover, Internal disciplinary bodies conduct proceedings behind closed doors. This limited transparency prevents the public from understanding how decisions are made. When outcomes are not openly explained, the public doubts whether the system truly addresses misconduct. This secrecy undermines trust in the judiciary and creates suspicion that serious issues are resolved quietly or ignored altogether.

Furthermore, Internal disciplinary systems often move slowly due to procedural delays, limited hearings, or reluctance to open inquiries against sitting judges. Some cases remain pending for years without resolution (Mangi, Magsi & Ali, 2025). This slow pace discourages complainants, discourages reform, and suggests that the judiciary lacks urgency in dealing with misconduct. Delayed accountability results in prolonged uncertainty and weak enforcement. In addition to that the Judges evaluate fellow judges within the same institution, sometimes within the same court hierarchy. This overlap creates a conflict of interest and compromises impartiality and weakens the deterrent effect of accountability (Amjid, Saeed & Jathol, 2025).

Moreover, financial or administrative corruption often requires strong investigative tools and independent oversight. Internal judicial bodies generally lack the resources, training, and enforcement capacity that specialized anti-corruption agencies possess. When internal systems handle corruption without adequate tools, the process becomes symbolic rather than effective (Ali, Hussain & Akhtar, 2024). This weakness allows corruption risks to persist within the judiciary.

The Effectiveness of Internal Judicial Accountability Mechanisms

Internal disciplinary mechanisms protect judicial independence by allowing the judiciary to control its own standards of conduct. When judiciary investigate and decide complaints against its members, they keep the ground realities in consideration (Rehman, 2020). This approach prevents the Executive or Legislature from intruding into judicial affairs and upholds the doctrine of separation of power. By exercising internal control, the judiciary preserves its autonomy and maintains an environment where judges can decide cases without external pressure.

Moreover, an internal disciplinary system reduces the risk of political misuse. If executive agencies conducted inquiries into judges, those agencies could use investigations as a tool to influence judicial decisions. Political actors could threaten inquiries to create pressure. By handling complaints internally, the judiciary blocks these tactics and ensures that no one misuses accountability to manipulate judgments (Fatima, Bilal & Khokhar, 2022). This structure protects the courts from selective or targeted action.

In addition to the aforesaid effectiveness, the Judges possess the expertise needed to evaluate the behaviour of judicial officers. They understand the nature of judicial discretion, courtroom pressures, and professional ethics. This experience allows them to examine complaints with greater accuracy. Senior judges can distinguish between genuine misconduct and legitimate judicial action, a distinction that outside investigators may fail to appreciate (Fatima, Bilal & Khokhar, 2022). This expertise makes internal accountability reliable and fair.

Furthermore, Internal mechanisms protect judges from baseless or harassing complaints. Litigants, political groups, and influential individuals can misuse external forums to pressure judges. An internal review process screens such complaints and prevents misuse of accountability procedures (Martinez, 2020). This protection allows judges to apply the law fearlessly and discourages attempts to intimidate or influence them. Moreover, internal disciplinary bodies can deal with sensitive allegations more efficiently. Many complaints relate to ongoing cases or confidential interactions. External investigations can create unnecessary publicity or affect the fairness of proceedings. Internal forums handle such matters with discretion and maintain the dignity of the judiciary. By keeping sensitive information confidential, the process protects both the institution and the individual judge (Agha & Naqvi, 2022).

CONCLUSION

This research demonstrates that the debate surrounding judicial accountability in Pakistan cannot be resolved through a simplistic preference for either internal or external oversight. Pakistan's declining position on the Corruption Perception Index and the criticism advanced by the Human Rights Committee undeniably reflect public concern regarding transparency and trust in state institutions. However, these concerns must be examined within the constitutional context of Pakistan, where judicial independence is not merely an administrative principle but a foundational requirement for the rule of law and separation of powers.

The analysis establishes that the HRC's critique, while well-intentioned, does not fully engage with Pakistan's constitutional structure and the historical vulnerabilities of the judiciary to political influence. The assumption that external accountability mechanisms inherently promote transparency overlooks the real risk that such mechanisms may compromise judicial autonomy, subject judges to executive or legislative pressure, and weaken public confidence in impartial adjudication. Judicial independence loses its meaning if accountability is achieved at the cost of institutional autonomy.

At the same time, this research acknowledges that reliance solely on internal mechanisms, particularly the Supreme Judicial Council, has generated legitimate concerns regarding opacity, limited public access, and delayed or undisclosed disciplinary outcomes. These weaknesses have contributed to perceptions of impunity and have eroded public trust in the judiciary. Ignoring these shortcomings would neither strengthen independence nor enhance credibility.

Accordingly, this article concludes that Pakistan requires a balanced and constitutionally compatible model of judicial accountability. Such a model must preserve internal disciplinary control to protect judicial independence while incorporating measured transparency safeguards that enhance public confidence

without inviting political interference. Reforms should focus on procedural openness, reasoned disclosures, and institutional checks that respect constitutional boundaries rather than importing external oversight frameworks that may be unsuitable for Pakistan's legal and political realities.

Ultimately, effective judicial accountability in Pakistan lies not in choosing between independence and transparency, but in harmonising both. By recalibrating internal mechanisms to address genuine concerns while resisting reforms that threaten constitutional autonomy, Pakistan can move toward a judicial system that commands public trust, upholds the rule of law, and aligns with both domestic constitutional principles and international accountability expectations.

RECOMMENDATIONS

The reform of Pakistan's judicial accountability framework requires a focused strengthening of internal mechanisms rather than merely focusing on the introduction of external control. In this regard, the Supreme Judicial Council (SJC) should be modernised in procedures by adopting clear timelines for the initiation and conclusion of inquiries, issuing reasoned summaries of its decisions, and improving procedural transparency to the extent compatible with judicial dignity and confidentiality. Such reforms would address concerns regarding delay and opacity while maintaining the constitutional insulation of the judiciary from political or executive interference.

The judicial system should adopt a comprehensive and a uniform judicial conduct standard supported by continuous ethics training and performance evaluation mechanisms. Regular capacity-building programs focusing on integrity, conflict of interest, and judicial ethics which would reduce reliance on punitive accountability alone and promote a culture of self-regulation. This preventive approach aligns accountability with professional responsibility rather than external coercion.

Instead of direct external control, Pakistan should introduce narrowly tailored oversight mechanisms that allow independent review of procedural compliance without interfering in judicial decision-making. Parliamentary reporting requirements, judicial ombudsperson models, or periodic independent audits of accountability procedures—strictly limited to process rather than merits—would strike a constitutionally sound balance between transparency and judicial independence, thereby addressing international concerns without undermining the separation of powers.

In addition, internal accountability bodies within the judiciary must be equipped with specialised investigative and auditing expertise, particularly in matters involving allegations of financial or administrative corruption. The absence of professional investigative capacity weakens the effectiveness of disciplinary proceedings and reduces their deterrent value. By developing in-house expertise or structured technical support mechanisms, the judiciary can ensure that inquiries are both credible and thorough without compromising institutional independence.

Public confidence in judicial accountability can further be enhanced through structured reporting and communication. The publication of annual accountability and performance reports by the superior courts and High Courts, outlining the number and nature of complaints addressed and reforms undertaken, would promote transparency while preserving judicial autonomy. Such reporting would demonstrate institutional self-regulation and responsiveness without exposing judges to external pressure or politicised scrutiny.

Preventive accountability must also be prioritised through continuous judicial education. Institutionalised training programmes focusing on ethics, integrity, professional conduct, and accountability standards can play a critical role in preventing misconduct. By strengthening ethical awareness and professional

competence, the judiciary can reduce reliance on punitive measures and foster a culture of integrity from within.

Finally, future research should move beyond doctrinal analysis and incorporate empirical examination of judicial accountability in Pakistan. Studies analysing disciplinary outcomes, complaint resolution rates, and comparative accountability models in jurisdictions with similar constitutional structures would provide valuable insights for evidence-based reform. Such research would assist policymakers and judicial institutions in refining accountability mechanisms while safeguarding judicial independence.

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