

# **A Study on Evidentiary Value of Expert Evidence Under Indian Evidence Act 1872**

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**Abstract:** The conclusions or convictions of third people are, when in doubt, superfluous, and consequently, forbidden. Witnesses are to express the certainties just, i.e., what they themselves saw or heard or seen by some other sense. It is the capacity of the Judge and the Jury to shape their very own decision or sentiment on the certainties expressed. Accordingly, the feeling or the impression of an observer that it appeared to him from the lead of a crowd that they had gathered for an unlawful reason for existing isn't allowable to demonstrate the protest of the get together. (Sacher et al.) There are, in any case, cases in which the Court isn't in a situation to frame a right judgment, without the assistance of the people who have procured uncommon expertise or involvement in a specific subject. These observers are typically required to talk not actualities, but rather to give sentiments; and when this is the situation, it is regularly very amazing to see with what office, and to what degree, their perspectives can be made to relate with the desires or the interests of the gatherings who call them. In such cases, the assistance of specialists is required. In these cases, the run is loose, and master proof is confessed to empower the Court to go to a legitimate choice and under this head come matters of science, workmanship, exchange, penmanship, finger impressions and outside law. (McClellan) The lead conceding master proof is established on need. To study how accused persons are protected by this law. To study how experts are appointed. To study how experts differ from ordinary witnesses.

**Keywords:** Evidence, expert, witness, court, convictions, information

## **I. INTRODUCTION**

This research paper deals with the evidentiary value of expert opinion. Under Indian Evidence Act, 1872 an expert can give opinion on the following 5 matters: hand writing, finger prints, arts and science, foreign language, digital evidence.

### **WHO IS AN EXPERT ?**

An expert is a person from legal or non-legal background. Expert opinion is sought by the court when the court thinks fit the opinion from an expert is needed. An expert should have knowledge, skills and experience in a particular field and need not necessarily be occupied by a formal education. The evidentiary value of expert opinion is RELEVANT and considered secondary evidence and corroborative proof. The expert opinion shall be verbal or non-verbal.

### **WHEN AN EXPERT OPINION IS NEEDED?**

An expert opinion is needed whenever the court feels that in some cases there needs clarifications from an expert. The Indian law failed to explain the qualifications of an expert. Whether an expert is someone who has knowledge and experience in a particular field is enough or he should have a professional degree also? Lets critically analyze section 45 of Indian Evidence Act, 1872:

**“When the court has to form an opinion upon a point of foreign law, or of science, or art, or as to identity of handwriting, or finger impressions, the opinions upon that point of persons specially skilled in such foreign law, science or art or in questions as to identity of handwriting or finger impressions, are relevant facts”.**

From this section it is understood that an expert is someone who has knowledge and is skilled in a particular field and such persons opinion shall be admissible as an expert opinion.

### **IMPORTANCE OF EXPERT OPINION**

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An expert opinion is needed when a court needs additional clarification regarding a case. Though an expert opinion is not a conclusive proof, the statement is taken into account and further inquiry is proceeded keeping in mind those opinions.

An expert's opinion can trigger doubts on the accused or the complainant. Because the opinion of an expert is considered RELEVANT.

A corrupt expert opinion can either result in discharge of a guilty person or guilty of an innocent person.

An expert might face trouble in long term trial cases. Because the expert gives opinion on multiple cases and an expert is nowhere related to the case. This might lead to faulty opinion. Eg. a registered medical practitioner who appears in multiple cases as an expert since he performs multiple autopsy.

## **II. CASE LAWS ON EXPERT OPINION**

### **Frye v. United States, 1923.**

In this case, the principle of ' **general acceptance**' also known as frye standards, was formulated. The principle general acceptance means the expert should take the evidence and procedures by the process accepted by all the scientists. This principle was strictly followed keeping in mind the importance of expert opinion or evidence. Some drawbacks of this principle were:

All scientists might not be aware of other scientists' research and findings.

The theory and technology are not standards, the inventions keep changing.

It is difficult to convince every scientist and get general acceptance since the intellectual capacity might differ.

### **Daubert v. Merrell Dow Pharmaceuticals, Inc , 1975**

This case played a significant role in abolishing the principle of GENERAL ACCEPTANCE, in U.S legislation after 75 years. The court held that :

'If scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education, may testify thereto in the form of an opinion or otherwise.'

In this case the Supreme court of U.S overruled the decision of lower court and abrogated rule 702 of FEDERAL RULE OF EVIDENCE.

### **Kumho Tire Co. v. Carmichael, 526 U.S. 137 (1999)**

In this case, the U.S Supreme court further clarified the lacuna and confusion regarding the qualification of the expert. The court ruled that "the opinion of a person who has sufficient knowledge, experience and skill in a particular field is admissible as an expert opinion and the person does not necessarily have to possess a formal degree from any educational institution".

From the above decisions it is understood that the opinion of an expert is relevant. The expert can be someone who has sufficient knowledge, experience and is skilled in a particular field. the evidentiary value of an expert opinion or evidence is considered as corroborative proof and secondary evidence. **The main aim of the research is to study the evidentiary value of expert evidence under Indian evidence act 1872.**

## **OBJECTIVES**

- To study the admissibility and evidentiary value of expert evidence.
- To study how experts differ from ordinary witnesses.
- To critically analyze the case laws related to experts.
- To study the qualifications of an expert.

## **II. REVIEW OF LITERATURE**

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The article [www.shareyouressays.com](http://www.shareyouressays.com) reveals that The opinions or beliefs of third persons are, as a general rule, irrelevant, and therefore, inadmissible. Witnesses are to state the facts only, i.e., what they themselves saw or heard or perceived by any other sense. It is the function of the Judge and the Jury to form their own conclusion or opinion on the facts stated.

The article [www.legalservicesindia.com](http://www.legalservicesindia.com) reveals that section 45 to section 51 under chapter 11 of the Indian evidence act provide relevancy of opinion of third persons, which is commonly called in our day to day practice as expert's opinion. These provisions are exceptional in nature to the general rule that evidence is to be given facts only.

The article [blog.ipleaders.in](http://blog.ipleaders.in) reveals that under section 45, opinions of experts are relevant on questions of foreign law, science, art, identity, handwriting or finger impressions. Expert testimony is admissible on the principle of necessity. The help of experts is necessary when the question involved is beyond the range of common experience or common knowledge or where the special study of a subject or special training or skill or special experience is called for. No man is omniscient; in fact, perfection is an attribute of divinity only.

The article [articlesonlaw.wordpress.com](http://articlesonlaw.wordpress.com) reveals that a person who is very knowledgeable about or skilful in a particular area is an expert. The question is whether who to be a witness. The expression to be a witness was held to mean imparting knowledge in respect of relevant facts.

The article [www.academia.edu](http://www.academia.edu) reveals that As a general rule, court always sees towards the direct evidence and tends to accept the evidence of witness, who saw or hear or perused the fact. The court weighs only indirect and circumstantial evidence, but Indian evidence act 1872 provides an exception to this rule by inserting the sec.45 with speaks with the title opinion of experts.(Website)

The article [www.srdlawnotes.com](http://www.srdlawnotes.com) reveals that The general rule is that opinion of a witness on a question, whether of fact or law is irrelevant. Opinion of expert (third person) is relevant under section 45 as an exception to this general rule. These are the parties not directly or indirectly connected in any manner to the suit or proceeding which is pending in the court, but they are called by the Court to assist the Court, when the Court cannot form the judgment himself. Section 45 to 51 of Indian Evidence Act 1872 lays down the provisions relating to "opinion of experts/ third person when relevant.

The article [acadpubl.eu](http://acadpubl.eu) reveals that This rule is to ensure that justice is delivered and the Judge's time is also not wasted.2 Witnesses are those people who report the facts. The term „facts“ here means and contains only facts. Opinion, beliefs, ideas,etc are not bought into its ambit. It should be understood that these facts must be perceived by the witness through one of his five senses.

The article [acadpubl.eu](http://acadpubl.eu) reveals that Medical evidences in India are used by investigating agencies to prove the guilt of the accused. The medical and scientific evidences can play a major role in identifying the accused and proving his guilt. These evidences are mainly corroborative pieces of evidences. The expression “evidence” means “oral or documentary or circumstantial proof of the allegations in issue between the parties in a legal proceeding”. “Medical evidence” means a proof given by medical expert, which is based on his scientific knowledge skill and personal experience.

The article [reliableclinicalexperts.com](http://reliableclinicalexperts.com) reveals that These are the most numerous of all the different types of expert witnesses. In many instances, they're the rock stars of medical malpractice, violent crime, and accident cases. A medical expert witness is usually a doctor, but also could be a specialist in the medical field, like a nurse, medical technician, or physician's assistant. In many cases, the medical expert witness doctor will be a Medical Examiner and they will testify regarding the cause of a death or the factors that contributed to that death. In other cases, they will be specialized, as in a specialist medical witness in dental surgery or science.

The article [pvteyes.com](http://pvteyes.com) reveals that Forensic science means any kind of science applied to the field of law. In the case of medical examiners, the forensic expert witness has some overlap with the medical expert witness, but forensic expert witnesses range from ballistic experts to chemists, biologists, blood spatter analysts, psychologists and criminal behavior experts. Most large law enforcement agencies have their own dedicated forensic science teams who they rely on not only to analyze evidence, but to provide testimony in court.

The article [www.lexology.com](http://www.lexology.com) The requirement for expert evidence is almost taken for granted in construction and engineering disputes. It is assumed that the technical nature of the issues will be sufficiently complex that the court will need specialist input to understand them, and that such input will be required in relation to a number of different disciplines/technical issues.

The article [www.litiligroup.com](http://www.litiligroup.com) reveals that An expert witness can be called upon whether they have knowledge directly relating to the case or if they hold comprehensive knowledge about an incident or fact in question.

The article [www.okorieokorochoa.com](http://www.okorieokorochoa.com) reveals that Consulting experts are expert witnesses called upon by your own private counsel to help in the defense or knowledge of a case. They can give insight into various elements and ways in which the counsel can construct their argument. Another important element of a consulting expert is that their privacy is respected if they merely advise counsel. If, however, consulting experts are called upon to testify during court proceedings, their right to anonymity is wavered and they become testifying experts.

The article [www.cps.gov.uk](http://www.cps.gov.uk) reveals that The first question for prosecutors to consider is always going to be: Is expert evidence needed in this case? If a bench or jury is going to be able to decide upon the case by listening to or viewing the evidence and bringing to bear their own senses, knowledge and experience, then no expert is needed. In many cases, prosecutors can prove the point in issue by reference to other evidence where unnecessary use of experts may result in confusion.

The article [www.seak.com](http://www.seak.com) reveals that The legal requirements for being an expert witness are fairly minimal. According to Federal Rule of Evidence 702, expert witnesses must have “knowledge, skill, experience, training, or education” which will “help the trier of fact to understand the evidence or to determine a fact in issue.” This is a very broad standard.

The article [www.academyofexperts.org](http://www.academyofexperts.org) reveals that the primary function of an expert witness is to express his independent expert opinion on the information that is provided. An expert can be employed in different capacities for example at arbitrations.

The article [blogs.findlaw.com](http://blogs.findlaw.com) reveals that rules about xpert witness are set by the state and federal rules of evidences, depending on whether your case is in state or federal court.

The article [www.theexpertinstitute.com](http://www.theexpertinstitute.com) reveals that Expert witnesses play a critical role in the judicial process. The testimony of these professionals can swing juries, educate judges on complex technical subjects, and ultimately win lawsuits. Expert witness opportunities are available for individuals with advanced expertise in any discipline – from master plumbers to leading neurosurgeons – the diversity of civil litigation means that there is a consistent demand for experts in every industry.

The article [www.ewi.org.uk](http://www.ewi.org.uk) reveals that when an expert evidence is called for in court of law...its time to call in the expert witness. In so many trials, it is carefully considered evidence of experts witness can be ensure a justice outcome.

The article [www.americanbar.org](http://www.americanbar.org) reveals that Locating the best expert for your case takes both creativity and diligence. The search for your expert should be done as early as possible. This is because it can take some time to locate and retain the right expert. Experts, like attorneys, are very busy, and the expert may not get back to you right away. Also, you may connect with someone who seems like a good fit for your case, but after speaking with the expert, you may realize that he or she does not have the right qualifications.

### **III. MATERIALS AND METHODS**

This paper used both primary and secondary data. Primary data collected from precedents, legislation, law commission reports, articles. Secondary data collected from the survey. Survey taken by simple random sampling method. The research paper is done in both doctrinal and non-doctrinal methods. The survey was limited to 250 samples because of the time constraint. The dependent variable is whether an expert is admissible in all cases. Do you think accused persons are protected by this law. The independent variable is gender, monthly income. The analysis of the survey is done by using chi-square and frequency tests.

### **IV. DATA ANALYSIS AND INTERPRETATION**

**Frequency Table**

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**Gender**

		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	Male	926	57.6	57.6	57.6
	Female	683	42.4	42.4	100.0
	Total	1609	100.0	100.0	

From the above table the number of people responded are 926 male and 683 female.

**Age**

		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	20 to 30 years	469	29.1	29.1	29.1
	31 to 40 years	595	37.0	37.0	66.1
	41 to 50 years	473	29.4	29.4	95.5
	Above 50 years	72	4.5	4.5	100.0
	Total	1609	100.0	100.0	

from the above table the number of people responded under the question of age are 469 are from the age of 20-30, 595 are from 31-40, 473 are from 41-50 and 72 are above the age of 50.

**Education**

		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	High school	212	13.2	13.2	13.2
	Higher secondary	386	24.0	24.0	37.2
	UG	713	44.3	44.3	81.5
	PG	298	18.5	18.5	100.0
	Total	1609	100.0	100.0	

From the above table the number of people responded under the question of educational qualification are 212 are from high school, 386 are from higher secondary, 713 are UG graduates, 298 are PG graduates.

**Marital status**

		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	Married	935	58.1	58.1	58.1
	Unmarried	674	41.9	41.9	100.0
	Total	1609	100.0	100.0	

From the above table the number of people responded under the question of marital status are 935 of them are married and 674 of them are unmarried.

**Monthly Income**

		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	15000 – 30000	368	22.9	22.9	22.9
	30001 – 40000	610	37.9	37.9	60.8
	40001- 50000	522	32.4	32.4	93.2
	Above 50001	109	6.8	6.8	100.0
	Total	1609	100.0	100.0	

From the above table the number of people responded under the question of monthly income is 368 of them are receiving salary from 15000-30000, 610 are from receiving 30001-40000, 522 are from receiving 40001-5000 and 109 are from receiving above 50001.

**Occupation**

		Frequency	Percent	Valid Percent	Cumulative Percent
Valid	OptioBusiness	280	17.4	17.4	17.4
	Private company employee	633	39.3	39.3	56.7
	Government job	598	37.2	37.2	93.9
	unemployed	98	6.1	6.1	100.0
	Total	1609	100.0	100.0	

From the above table the number of people responded under the question of occupation are 280 are doing business, 633 private company employee, 598 government job employee, 98 are unemployed.

**Case Processing Summary**

	Cases					
	Valid		Missing		Total	
	N	Percent	N	Percent	N	Percent
Gender * 59.Whether an expert is admissible in all the case?	1609	100.0%	0	0.0%	1609	100.0%
Gender * 60.Do you think accused person to protected by this law?	1609	100.0%	0	0.0%	1609	100.0%
Monthly Income * 59.Whether an expert is admissible in all the case?	1609	100.0%	0	0.0%	1609	100.0%
Monthly Income * 60.Do you think accused person to protected by this law?	1609	100.0%	0	0.0%	1609	100.0%

**HYPOTHESIS**

**HO HYPOTHESIS:** there is no Significant association between

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Gender and an expert is admissible in all Cases.

**HA :** there is significant association between gender and an expert is admissible in all cases.

**Gender \* Whether an expert is admissible in all the case?**

**Crosstab**

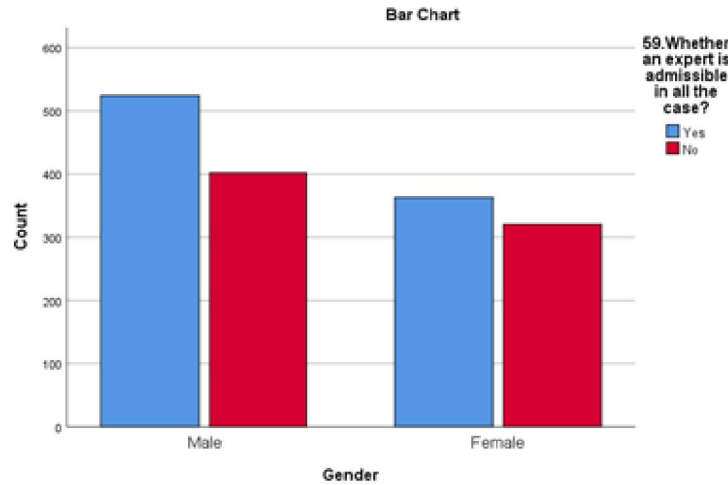
		59. Whether an expert is admissible in all the case?			
			Yes	No	Total
Gender	Male	Count	524	402	926
		% within Gender	56.6%	43.4%	100.0%
		% within 59. Whether an expert is admissible in all the case?	59.1%	55.7%	57.6%
	Female	Count	363	320	683
		% within Gender	53.1%	46.9%	100.0%
		% within 59. Whether an expert is admissible in all the case?	40.9%	44.3%	42.4%
Total	Count	887	722	1609	
	% within Gender	55.1%	44.9%	100.0%	
	% within 59. Whether an expert is admissible in all the case?	100.0%	100.0%	100.0%	

**Chi-Square Tests**

	Value	df	Asymptotic Significance (2-sided)	Exact Sig. (2-sided)	Exact Sig. (1-sided)
Pearson Chi-Square	1.880 <sup>a</sup>	1	.170		
Continuity Correction <sup>b</sup>	1.743	1	.187		
Likelihood Ratio	1.879	1	.170		
Fisher's Exact Test				.171	.093
Linear-by-Linear Association	1.879	1	.170		
N of Valid Cases	1609				

a. 0 cells (0.0%) have expected count less than 5. The minimum expected count is 306.48.

b. Computed only for a 2x2 table



From the above table it is understood that among total of 926 male 524 had said that an expert is admissible in all cases and 402 had said that an expert is not admissible in all cases. Among 683 females 363 had said that an expert is admissible in all cases and 320 had said that an expert is not admissible in all cases. From the chi square table it is understood that **Null HYPOTHESIS** is accepted

**HYPOTHESIS**

**HO:** There is no significant association between Gender and accused person are protected by this law.

**HA:** There is significant association between Gender and accused person are protected by this law.

**Gender \* Do you think accused person to protected by this law?**

**Crosstab**

		60.Do you think accused person to protected by this law?			
		Yes	No	Total	
Gender	Male	Count	560	366	926
		% within Gender	60.5%	39.5%	100.0%
		% within 60.Do you think accused person to protected by this law?	57.1%	58.3%	57.6%
	Female	Count	421	262	683
		% within Gender	61.6%	38.4%	100.0%
		% within 60.Do you think accused person to protected by this law?	42.9%	41.7%	42.4%
Total	Count	981	628	1609	
	% within Gender	61.0%	39.0%	100.0%	



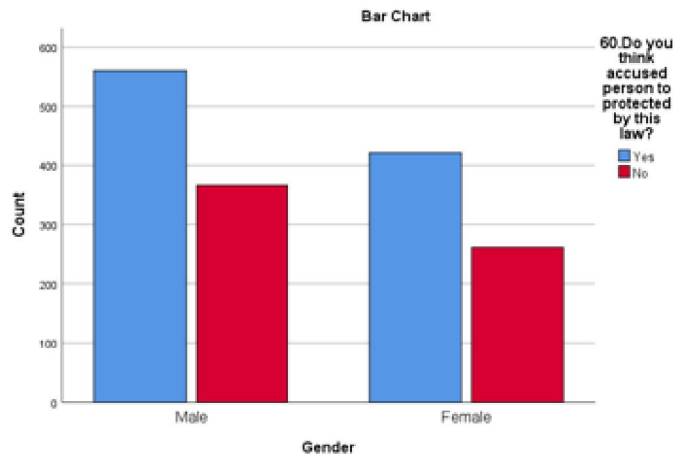
% within 60.Do you think accused person to protected by this law?	100.0%	100.0%	100.0%
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**Chi-Square Tests**

	Value	df	Asymptotic Significance (2-sided)	Exact Sig. (2-sided)	Exact Sig. (1-sided)
Pearson Chi-Square	.224 <sup>a</sup>	1	.636		
Continuity Correction <sup>b</sup>	.178	1	.673		
Likelihood Ratio	.224	1	.636		
Fisher's Exact Test				.642	.337
Linear-by-Linear Association	.224	1	.636		
N of Valid Cases	1609				

a. 0 cells (0.0%) have expected count less than 5. The minimum expected count is 266.58.

b. Computed only for a 2x2 table



From the above table it is understood that among 926 male 560 male had said that accused are protected by this law and 366 male had replied that accused are not protected by this law. Among 683 females 461 females had said that accused are protected by this law and 262 females had said that accused are not protected by this law. From the chi square table it is in that

**NULL HYPOTHESIS** is accepted and alternate hypotheses are rejected.

**V. CONCLUSION**

The expert witness giving opinion evidence based upon other witnesses' facts started in the late 18th century with the judgment in *Folkes v. Chadd* in 1782. Use of medical evidence remained haphazard in the 19th century and concerns of use of experts also developed in that century. The *Frye* decision in 1923 was the first major decision concerned with admissibility of novel science.

In the late 20th century and into the 21st century, common law legal systems have promulgated duties of experts and changed how courts may use expert witnesses. A detailed analysis of Daubert hearings and forensic pathology is beyond the scope of this paper. Daubert decisions have mostly involved civil cases and appear to have had little impact on the general practice of forensic pathology, though there have, for example, been occasional Daubert hearings regarding pediatric head injury.

In view of the interest of courts, those who act as expert witnesses can still expect changes made either by courts or legislation on how expert witnesses will be received by the courts, how they will be used in trials, and whether continue to enjoy the immunity of witnesses.

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