

LAWFOYER INTERNATIONAL
JOURNAL OF DOCTRINAL LEGAL
RESEARCH
(ISSN: 2583-7753)

Volume 3 | Issue 1

2025

© 2025 LawFoyer International Journal of Doctrinal Legal Research

Follow this and additional research works at: www.lijdlr.com
Under the Platform of LawFoyer – www.lawfoyer.in

After careful consideration, the editorial board of LawFoyer International Journal of Doctrinal Legal Research has decided to publish this submission as part of the publication.

In case of **any suggestions or complaints**, kindly contact info.lijdlr@gmail.com

To submit your Manuscript for Publication in the **LawFoyer International Journal of Doctrinal Legal Research**, To submit your Manuscript [Click here](#)

BALANCING PUNISHMENT AND SUPPORT: AN ANALYSIS OF THE JUVENILE JUSTICE SYSTEM

Avantika Sahni¹

I. ABSTRACT

This paper examines the issues and potential solutions surrounding the rehabilitation and punishment of young offenders by examining different legal frameworks in India. Also, it analyses landmark cases that have shaped legal and public perceptions, highlighting the complexity of juvenile crime and its consequences. The rise in juvenile delinquency in India is a significant problem that calls for effective measures. The government has created several laws, acts, and guidelines to help reduce violence among young people, but these efforts have not been that effective.

This might be due to the current laws regarding minors, which do not adequately prevent delinquent behavior, and the lack of proper services and rehabilitation programs. In India, the way children and adults are treated for crimes has been different for a long time. This practice started even before British laws were in place. Hindu and Islamic traditions both had specific guidelines for punishing minors, understanding that children are not as accountable as adults.

Solving this major legal and social problem will be a joint effort that includes not only government bodies but also the community, parents, the general public, and other involved parties. A coordinated approach from all these groups is vital in order to eliminate this issue from the root and successfully addressing this problem will benefit the nation's growth and future development. The Juvenile Justice System is a dynamic and extensive framework used globally to support the overall growth of children. This aims to analyze and explore the historical development, current challenges, and future directions of the juvenile justice framework in India, particularly in light of recent legislative changes and social dynamics.

¹ IILM University, Greater Noida

II. KEYWORDS

Juvenile Justice, rehabilitation, juvenile delinquency, offense, juveniles, reform, judicial reforms, Juvenile Justice Act

III. INTRODUCTION

The term, “*juvenile*” means a child below the age of eighteen years², meaning individuals who have not achieved the age of majority, and who have been involved in criminal behavior, regardless of the severity of the offense. These individuals are often referred to as juvenile offenders or juvenile delinquents. The youth is often called the future of our country and is its greatest resource but sometimes, these young minds can be influenced or turned towards a path of crime. This can be due to several social and economic factors in relation to family issues, substance abuse problems, environmental factors, etc.

While every individual should face consequences for violating the laws, the punishment of the crime must be decided on circumstances and severity. Especially for juveniles, there should be a balance between accountability and helping them become a responsible citizen through programs and initiatives. There have been many developments including the Juvenile Justice (Care and Protection of Children) Act, 2015 which came after the 2000 act.

A significant number of civilized countries have put in place Juvenile Justice Laws to guarantee fair treatment for young offenders, allowing them to lead lives that are peaceful, ethical, and democratic in nature. These laws apply to those under 18 years of age. The administration of Juvenile Justice is carried out through Juvenile Courts that are child-friendly.

As the juvenile justice landscape in India continues to evolve, it is essential to consider the implications of judicial interpretations, historical contexts, and the socio-economic realities that contribute to juvenile delinquency. A clear understanding of these issues helps leaders and society develop better and more caring strategies that support the

² The Juvenile Justice (Care and Protection of Children) Act, 2015, s. 2(35).

complete development of young people. This is vital for creating a fair system that looks out for all children.

This research paper analyzes the development, challenges, and future prospects of the juvenile justice system in India, with a specific focus on the Juvenile Justice (Care and Protection of Children) Act, 2015. It reviews the historical context and socio-economic factors that contribute to juvenile delinquency, assesses key judicial interpretations that have shaped the legal framework, and suggests reforms aimed at improving rehabilitation and accountability for young offenders. By promoting a comprehensive approach that combines legal, social, and community-based strategies, this paper highlights the meaning, the historical background, the legal framework, landmark cases and judgments, the challenges, the evolution of the system, and the future of this area of law.

IV. RESEARCH OBJECTIVES

- To Analyse the Current Legal Framework of Juvenile Justice in India.
- To Explore the Social and Economic Factors Affecting Juvenile delinquency and the Reforms available for Juvenile Offenders.
- To understand how the legal system and laws regarding juveniles have evolved and the changes that occurred due to landmark judgments.
- To explore the potential solutions and suggestions for improvement in the Juvenile Justice System.

V. RESEARCH QUESTIONS

- How does the Juvenile Justice (Care and Protection of Children) Act, 2015 impact juveniles?
- What is the Historical background of the development of the Juvenile Justice System in India?
- What challenges exist in the implementation of juvenile justice laws and how have Indian courts interpreted laws related to juvenile justice in various cases?
- What changes are needed to enhance the efficiency of the juvenile justice system in India?

VI. RESEARCH HYPOTHESES

- The Juvenile Justice system in India has been reformed over the years, with the introduction of the Juvenile Justice (Care and Protection of Children) Act, 2015 aiming to strengthen the rights and protection of juvenile offenders, offering reforms and rehabilitation programs.
- The historical evolution of the Juvenile Justice System in India illustrates a shift from colonial-era legislation to modern frameworks that emphasize the rehabilitation and protection of young offenders. Significant milestones in this development include the introduction of the Children Act in 1960, the Juvenile Justice Act of 1986, and the important amendments made in 2015. As society evolves and changes over time, the legal system must also adapt so the original principles and ideals are preserved yet are amended accordingly.
- Ensuring that juvenile offenders receive proper care and rehabilitation can be a challenge for these facilities due to limited funding, inadequate facilities, and a lack of well-trained staff. Indian courts approach juvenile laws with a balance between the principles of rehabilitation and accountability, resulting in various outcomes based on different situations in individual cases.
- A more active approach, including legislative changes, better training and resources, community-based rehabilitation programs, and greater public awareness and participation, can greatly improve the effectiveness of the juvenile justice system in India.

VII. RESEARCH METHODOLOGY

The research methodology used in this paper is completely doctrinal in nature. A distinctive approach to legal research, doctrinal research, also referred to as library-based research mainly involves the examination and evaluation of existing legal provisions, case laws, landmark judgments, and academic publications. This approach works effectively for analyzing the theoretical foundations of law and for presenting legal doctrines and principles in a methodical manner. Statutory materials, court rulings, and authoritative texts are some of the basic sources used in doctrinal

research. Secondary sources like articles, legal digests, and commentaries are also reviewed. But there are limitations to this method of research as well like, lack of empirical evidence, limited access to legal resources, complexity of legal language, etc. The paper aims to present a comprehensive understanding of laws for juvenile crime and the ever-changing juvenile justice system in India.

VIII. LITERATURE REVIEW

The paper draws upon key provisions of the Juvenile Justice (Care and Protection of Children) Act, 2015, and the various amendments and acts related to the concept. It also refers to law commentaries, blogs, and journals to explain the complex system of juvenile justice in our country. In-depth analysis has been done with the help of many legal databases, several Supreme Court and High Court judgments, and various amendments in recent years. The literature reviewed in the paper provides a thorough understanding of the legal framework regarding this and seeks to analyze the provisions alongside various judicial decisions.

IX. JUVENILE JUSTICE SYSTEM

The juvenile justice system's main aim is protecting the children through suitable intervention and directing their growth toward positive development. As we know, children are the future of our nation but sometimes due to the involvement of various factors, they may get influenced toward the path of crime. The main purpose of these judicial interpretations, legal provisions, and amendments is to prevent juvenile delinquency and help young juveniles be productive members of society moving forward.

This system is a socio-legal framework designed to help the rehabilitation of juvenile offenders a smoother process. Nearly all developed nations have enacted Juvenile Justice legislation to ensure that young individuals are treated equitably, thereby enabling them to pursue normal life. These statutes pertain to individuals who are under the age of eighteen. The administration of Juvenile Justice is conducted through specialized juvenile courts.

The Indian judicial system firmly upholds the doctrine of "*Doli Incapax*"³, which means 'incapable of wrongdoing.' It's a principle that a child cannot form criminal intent to commit an offense. Section 20 of BNS states "*Nothing is an offence which is done by a child under seven years of age.*"⁴ A child under 7 years old cannot fully understand the results of their actions. They may not know or intend to commit a crime, so just the act itself is not enough for prosecution without the intention behind it. Only 'actus reus' cannot be a ground for prosecution unless accompanied by 'men's rea'.

The primary objective of this system is to emphasize rehabilitation rather than punishment. In instances where a minor or young individual commits an offense or becomes involved in delinquent behavior, the Juvenile Court intervenes to offer supportive care and compassionate treatment through specialized institutions. This approach provides a valuable opportunity for juvenile offenders to progress toward a life of peace and integrity.

A. Historical Background

Juvenile justice in India has changed from its colonial roots to current laws, emphasizing the importance of humane treatment and rehabilitation for young offenders. Despite existing challenges, reforms are necessary to improve the system and tackle the social and economic issues that lead to juvenile crime, helping to build a responsible and productive society.

Concerned about the treatment and rights of juvenile offenders, the United Nations General Assembly passed the Convention on the Rights of the Child on November 20, 1989. This convention seeks to ensure the best interests of juveniles and provides for social reintegration. The Juvenile Justice Act of 1986, which replaced the Children Act of 1960, aimed to implement the guidelines outlined in the convention. But the Juvenile Justice Act of 1986 was repealed and a new statute was introduced, now known as The Juvenile Justice (Care and Protection of Children) Act, of 2000 which was later amended in 2015, and focused on a more punitive approach for serious

³ Doli Incapax maintains that children are generally viewed as incapable of committing criminal offenses.

⁴ Section 20 of Bharatiya Nyaya Sanhita, 2023

offenses committed by juveniles in an older range. Then, it was again amended in 2021, the changes that were made were mainly in the offense classification.

Given below is a clearer yet simple timeline of the evolution of the juvenile justice system in India with several significant milestones and legislative changes: -

- **1920:** The enactment of the Children Act established the first legal framework for juvenile justice in India.
- **1986:** The Juvenile Justice Act replaced the Children Act, placing a greater emphasis on the rehabilitation principle and welfare of juveniles who come into conflict with the law.
- **2000:** The introduction of the Juvenile Justice (Care and Protection of Children) Act highlighted the necessity for the care and protection of neglected and delinquent children.
- **2015:** Amendments to the Juvenile Justice (Care and Protection of Children) Act permitted the trial of juveniles aged 16 to 18 as adults for heinous offenses like rape, murder, etc.
- **2021:** The introduction of the Juvenile Justice (Amendment) Bill aimed to further strengthen the system and address emerging challenges.

B. Legal Framework

The Juvenile Justice Act of 2015 replaced the Juvenile Justice Act of 2000 following the Nirbhaya Rape case.⁵The Juvenile Justice Act of 2015 gave a classification of offenses seeking to allow a minor between 16 and 18 years old to be tried as an adult for heinous crimes committed, after assessment. The Juvenile Justice Board shall be responsible for the preliminary assessment and shall take the assistance of psychologists or experts who have experience working with children in difficult times.

The child should be provided with a legal aid counsel through the District Legal Services Authority who shall be present during the preliminary assessment, during which the Board and experts shall analyze and take into consideration the Social

⁵ Mukesh & Anr. V. State (NCT Of Delhi) & Ors, (2017) 6 SCC 1

Investigation Report (SIR), to be prepared by the Probation officer or Child Welfare Officer.

The Act, in determining this classification, has ensured safeguards by different rehabilitative measures for someone in the age group of 16 to 18 years accused of such serious crimes, as mentioned in Section 19 of the Act. This change aims to balance holding juveniles accountable while recognizing their natural vulnerabilities. The Act highlights the importance of education and rehabilitation, including options for care and learning specifically for young offenders. National and State Juvenile Justice Committees are set up to ensure the Act is followed and to tackle accountability and effectiveness in the juvenile justice system.

Some of the important sections of the 2015 Act are as follows:

- **Section 2** defines key terms like "child", "child in conflict with the law" and "child in need of care and protection."
- **Sections 4 and 5** explain how the Juvenile Justice Board is formed, which is responsible for handling cases involving juveniles in conflict with the law.
- **Section 14** outlines how the Child Welfare Committee (CWC) is set up to assist children needing care and protection while **Section 19** explains CWC's process to help children in need.
- **Section 15** is an essential section as it discusses how to assess, if a child aged 16 to 18 is involved in a serious crime and if the individual should be treated as a child or tried as an adult.
- **Section 21** ensures that the identities of children are kept private to protect their dignity.
- **Sections 24 and 25** focus on creating special homes and observation homes for the rehabilitation and shelter of juveniles.
- **Section 39** details the rehabilitation and social reintegration process, highlighting that it should be tailored to each child's needs and needs to be specific.

- **Section 40** discusses the registration of Child Care Institutions and the standards they must meet while **Section 41** outlines the criteria for declaring a Child Care Institution suitable for housing children for specific purposes.
- **Section 53** describes the adoption process, stating that adoption is only finalized after a court order.
- **Sections 82 to 87** list offenses against children in the Act and the penalties for these offenses, including punishment for child cruelty, child begging, and using children in militant activities.

Each section of the Act is designed to fulfill a specific purpose, embodying the core principles of justice, protection, and the best interests of the child, reflecting a comprehensive approach to juvenile justice in India. The rationale for several key sections of the Act, along with the ratio decidendi (the reasoning behind the decision) that informs their implementation, is to ensure clarity and consistency in its application, a more rehabilitative approach, and a case-by-case assessment, ensuring that the legal response is proportionate to the offense while considering the child's potential for rehabilitation.

The 2021 Amendment brought changes in the offense classification. The amendment in question affects Section 86 of the JJ Act. It reclassifies crimes under this special law, with penalties ranging from three to seven years, as non-cognizable. It means that for a non-cognizable offense, the police cannot arrest the accused without a warrant as well as cannot start an investigation.

A critical issue for legal professionals is the "claim of juvenility." This claim is determined by the Juvenile Justice Board, which is responsible for addressing it prior to the initiation of court proceedings. However, this claim may also be raised in court at any stage of the proceedings, including after the decision given by the court. In India, the Juvenile Justice System consists of various bodies that handle juvenile crimes and promote children's welfare. Juvenile Justice Boards, located at the district level, are responsible for dealing with juvenile offenses and include a judicial magistrate, a social worker, and a police officer.

Child Care Committees oversee the rights and welfare of children in care while Child Care Institutions offer protection and support for children facing legal issues, focusing on rehabilitation. Child Protection Units in police stations address child abuse and exploitation with sensitivity. Juvenile Courts are specifically designed to manage cases involving young offenders, ensuring appropriate legal proceedings.

C. Case Laws / Precedents

There are many case laws related to various parts and provisions of the Juvenile Justice system and its acts, laws, statutes, etc. Listed below are some of the notable precedents for the Juvenile justice system and its evolution-

Shila Barse vs Union of India [1988]⁶

In this case, Shila Barse, a social activist, filed a public interest litigation (PIL) with the Supreme Court of India, bringing attention to the poor conditions of children in juvenile homes. She argued that these homes were inhumane and violated the rights of the children, who often experienced neglect and abuse.

The Hon'ble Court said, "The offenses which are minor in nature, they should send in the observation home." The Court instructed the government to ensure that juvenile homes adhere to the standards established by the Juvenile Justice Act and to implement necessary measures aimed at enhancing the living conditions for children residing in these facilities. The concept of Juvenile Rehabilitation rather than punishment evolved from this case.

Abuzar Hossain @ Gulam Hossain vs State of West Bengal [2012]⁷

This case involved the determination of the age of the accused and the applicability of juvenile justice provisions. The court emphasized that the age of the accused should be determined based on documentary evidence such as birth certificates, school records, or any other relevant documents. In cases where such documentation is unavailable, a medical examination may be performed to determine the individual's age.

⁶ JT 1986 136

⁷ AIR 2013 SC 1020

The age should be assessed as of the date when the offense was committed, rather than at any subsequent stage during the trial or appeal process. In instances of ambiguity or uncertainty regarding the age, the court stated that such doubts should be resolved in favor of classifying the individual as a juvenile.

Anuj Kumar vs State of U.P. [2021]⁸

In this case, The Allahabad High Court held that a juvenile's criminal records should not disqualify them from public employment if it is from a period when they were underage or a minor. This case highlights the importance of addressing juvenile justice in employment law.

D. Challenges and Factors involved

Juvenile delinquency is not only about the legal aspect but it also represents a significant social challenge. Various factors, including poverty, inadequate educational opportunities, family difficulties, peer influence, and substance abuse, can profoundly affect young individuals. These influences may compel them to resort to criminal behaviors as a way of survival. Addressing these underlying issues and problems is equally as critical as reforming the juvenile justice system.

Socioeconomic challenges are key factors in youth crime. A significant number of young offenders come from backgrounds of poverty and limited educational resources. These conditions not only heighten the risk of criminal behavior but also reduce their chances for rehabilitation and reintegration into the community. Family problems and reduced parental guidance are major factors in the growing rates of youth delinquency. Issues like divorce, poor supervision, and a lack of affection often lead to misbehavior in young people. Economic struggles and poverty also contribute significantly to this issue. When parents struggle to meet their children's needs, kids may turn to stealing, which can develop into a habit and lead to more serious offenses.

Some issues and problems of the Juvenile Justice System are as follows-

- **Weak Preventive Strategies:** Existing measures to prevent juvenile delinquency do not sufficiently address key factors such as poverty, low

⁸ AIRONLINE 2021 ALL 687

literacy, unemployment, and unstable family environments. It is important for prevention programs to focus on these major causes and provide support and opportunities for at-risk youth to help prevent them from adopting a path of crime.

- **Strained Juvenile Justice System:** The juvenile justice system in India frequently suffers from a lack of personnel and resources, which interferes with its ability to assist young offenders. There is a critical need for enhanced infrastructure, skilled workers, and rehabilitation programs to better support these young individuals.
- **Poor Coordination Among Agencies:** It is really important for law enforcement, the judicial system, social workers, mental health experts, and other key groups to work together effectively to tackle juvenile crime. When these groups do not cooperate, it can create gaps and inconsistencies in how we prevent and deal with juvenile delinquency.
- **Social Bias and Exclusion:** Young juveniles often encounter strong social bias and exclusion, making it difficult for them to reintegrate into society. There is an urgent need to improve public understanding and promote positive views of these individuals to help them successfully become a contributing member of the community.
- **Delayed Justice:** The process of resolving cases for juvenile offenders is often slow, which can affect their ability to rehabilitate. Long stays in special or observation homes can harm their mental well-being. Also, there is a significant lack of necessary services such as education, vocational training, and aftercare. This shortcoming of the system can hinder a juvenile's successful return to society and increase the chances of reoffending.

X. DEVELOPMENT OF THE SYSTEM

In recent decades, the juvenile justice system has evolved significantly with both successes and failures but for a better future, changes must be made so that the system can develop and improve. The effects of legislative changes on the rehabilitation and reintegration of juveniles are complex. While reforms focused on rehabilitation can

yield positive results, there are ongoing challenges that must be addressed to ensure that all juveniles receive the necessary support for successful reintegration into society. A collaborative, evidence-based approach that takes into account the unique needs of young offenders is crucial for promoting sustainable change.

Some cases garner wide attention, while others have gone scarcely noticed. We know of the Nirbhaya case.⁹, where the juvenile suspect, considered one of the most vicious in the crime committed, was only 17 years and six months old at the time of the crime and was under custody for only three years. Three years was only the maximum term under the youth justice laws of India at the time. It was only after this that legislative amendments were made to try minors aged 16 years and above as adults in a court of law. In more recent times, a case, referred to as the Pune Car Crash, was that of a 17-and-a-half-year-old who allegedly crashed a luxury car while drunk and was charged with killing two people. The accused was held amenable to the full protection of the Juvenile Justice Act in an order passed by the Bombay High Court, stating that, in this case, the question of the severity of the offense was of little consequence with regard to the application of the provisions of the Act.

The juvenile justice system can see improvements through strategic initiatives. Transitioning to restorative practices that focus on the causes of delinquency may lead to more effective rehabilitation. Additionally, equipping law enforcement with training on the sensitive handling of young offenders can improve their interactions and overall outcomes.

A. The Road Ahead

The Juvenile Justice Act has made important progress, but there is still room for improvement. Here are some suggestions to enhance the Act-

- **Age Verification Process:** The Act should use a more accurate and scientific method to determine the age of individuals, especially those close to turning 18. Relying on birth certificates or school records can often lead to mistakes.

⁹ Mukesh & Anr. V. State (NCT Of Delhi) & Ors, 2017 6 SCC 1

- **Focus on Rehabilitation:** More attention should be given to helping children who break the law reintegrate into society. The Act should emphasize education, job training, and counseling to prepare them for successful and peaceful futures.
- **Alternative Punishments:** The Act should promote alternatives to jail, like community service, probation, or counseling for minor offenses. This would help reduce overcrowding in juvenile facilities and support restorative justice.
- **Monitoring and Implementation:** It is essential to implement the Act effectively, with regular checks and balances on how it is being applied and implemented. The government needs to provide the necessary resources and infrastructure for successful enforcement.
- **Child-Friendly Legal System:** The Act should create a legal system that protects children's rights during legal proceedings. This includes offering legal aid, financial support, and measures to shield children from abuse or violence.
- **Public Awareness Campaigns:** The government should launch campaigns to raise awareness within the community and educate the public, especially law enforcement, about children's rights and the law's provisions. These efforts will help protect children's rights and promote justice.

The path forward requires a commitment to dedication, collaboration, and a renewed focus on the welfare of children. Recognizing that children are the future of the nation and investing in their comprehensive development will enable India to cultivate a more equitable society. This approach not only fulfills the country's ethical and legal obligations to its most vulnerable citizens but also contributes to the overall progress and stability of the nation.

XI. CONCLUSION

The Juvenile Justice System relies on rehabilitation and reform rather than punishment, with importance put on the best interests of the minor or juvenile.

The Juvenile Justice Act of 2015 replaced the earlier legislation in India to improve the overall framework of justice provided in the context of the juvenile system. Provisions under this act include the classification of offenses and establishment of the specialized juvenile courts. Also, these efforts show a very strong commitment to the care, protection, development, and rehabilitation of juvenile delinquents. This system must maintain a delicate balance between punishment for terrible crimes like murder, and rape while providing rehabilitation services and programs for young juveniles in order to help them reform their ways and aid these individuals in becoming a respectable and productive member of the community.

“It is to be kept in mind that the legal sub-system is a part of the larger social system. Any change in the larger whole, that is the society necessitates changes in the constituent parts or the smaller sub-subsystems. Thus, when changes are occurring in the society at a fast pace, the legal system has to go in sync with the society.”¹⁰

Addressing juvenile delinquency effectively means using a holistic approach that considers all the different factors involved. Solutions should not just focus on the legal system but also include social welfare, education reform, family support, and community programs that tackle the deeper issues of juvenile crime.

The juvenile justice system in India has transformed greatly since independence. It has evolved from a solely welfare-based approach to one that balances rehabilitation and accountability. The Juvenile Justice Act of 2015 is the key legislation, focusing on rehabilitating young offenders and safeguarding their rights. It also permits harsher measures for older juveniles involved in serious crimes. The aim is to effectively balance helping juvenile offenders with the need for public safety and justice. The objective of this paper is to explore how the juvenile system has changed over a long period of time.

¹⁰ Deepshikha Agarwal, “JUVENILE DELINQUENCY IN INDIA- LATEST TRENDS AND ENTAILING AMENDMENTS IN JUVENILE JUSTICE ACT” 3 *PEOPLE: International Journal of Social Sciences* 1365-1383 (2018)

XII. REFERENCES

A. Commentaries / Journals / Papers Referred

- Simran Mandhyan, "Efficacy of Juvenile Justice System in India: An Analytical Approach" SSRN 3-10 (March 26, 2023)
- Ms. Abhilasha Belwal, Mr. Ashish Belwal, "JUVENILE DELINQUENCY IN INDIA" *Bharati Law Review* 307-317 (2016)
- Deepshikha Agarwal, "JUVENILE DELINQUENCY IN INDIA- LATEST TRENDS AND ENTAILING AMENDMENTS IN JUVENILE JUSTICE ACT" *3 PEOPLE: International Journal of Social Sciences* 1365-1383 (2018)
- Dr. Vidya Dhere, Dr. Anisa Shaikh, Nitesh Sharma, "A Systematic Study of Juvenile Crimes in India" XXVII *RABINDRA BHARATI PATRIKA* 253-258 (2024)

B. Online Articles / Sources Referred

- Subhash Ahlawat, Juvenile Delinquency in India: Problems and Solutions, Blog, 2024 (Last visited on Jan 29, 2025)
- Rishith P R, Analysis of India's flawed Juvenile Justice Labyrinth, Vidhi Centre for Legal Policy, 30 Jun 2024 (Last visited on Feb 2, 2025)
- Nimisha Srivastava, The Pune Porsche Case: Unpacking the Law on Bail, the 'Essay' and the Child-Adult Question, The Project 39A Criminal Blog, May 29, 2024 (Last visited on March 5, 2025)
- Harsh Raj, Understanding Juvenile Justice: A Path to Rehabilitation for Minors, Manupatra Articles, Oct 29, 2024 (Last visited on Feb 2, 2025)

C. Cases Referred

- Mukesh & Anr. v. State for NCT of Delhi & Ors., (2017) 6 SCC 1.
- Sheela Barse vs Union of India & Ors, JT 1988 (3)15
- Abuzar Hossain Alias Gulam Hossain vs State of West Bengal, AIR 2013 SUPREME COURT 1020

- Anuj Kumar vs State Of U.P, AIRONLINE 2021 ALL 687

D. Statute / Laws / Acts Referred

- The Juvenile Justice (Care and Protection of Children) Act, 2015
- The Bhartiya Nyaya Sanhita, 2023
- The Juvenile Justice (Care and Protection of Children) Act, 2000 (Act No. 56 of 2000)