



INDIAN JOURNAL OF  
LEGAL REVIEW

VOLUME 6 AND ISSUE 2 OF 2026

INSTITUTE OF LEGAL EDUCATION



## INDIAN JOURNAL OF LEGAL REVIEW

APIS – 3920 – 0001 | ISSN – 2583-2344

(Open Access Journal)

Journal's Home Page – <https://ijlr.iledu.in/>

Journal's Editorial Page – <https://ijlr.iledu.in/editorial-board/>

Volume 6 and Issue 1 of 2026 (Access Full Issue on – <https://ijlr.iledu.in/volume-6-and-issue-1-of-2026/>)

### Publisher

Prasanna S,

Chairman of Institute of Legal Education

No. 08, Arul Nagar, Seera Thoppu,

Maudhanda Kurichi, Srirangam,

Tiruchirappalli – 620102

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## “JUDICIAL ACTIVISM AND THE EVOLUTION OF VICTIM’S RIGHTS IN INDIA: AN ANALYSIS OF LANDMARK SUPREME COURT JUDGMENTS”

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**BEST CITATION** – RIYA TIWARI & DR. MUDRA SINGH, “JUDICIAL ACTIVISM AND THE EVOLUTION OF VICTIM’S RIGHTS IN INDIA: AN ANALYSIS OF LANDMARK SUPREME COURT JUDGMENTS”, *INDIAN JOURNAL OF LEGAL REVIEW (IJLR)*, 6 (2) OF 2026, PG. 767-774, APIS – 3920 – 0001 & ISSN – 2583-2344.

### ABSTRACT

The Indian criminal justice system traditionally focused on the rights of the accused, often overlooking the concerns and interests of victims. Over the years, however, the judiciary particularly the Supreme Court of India has played a crucial role in transforming this approach through judicial activism. This research paper examines how judicial activism has contributed to the recognition and expansion of victims’ rights in India by analyzing landmark Supreme Court judgments. Through progressive interpretation of constitutional provisions, especially Articles 14, 19, and 21 of the Constitution of India, the Court has strengthened the principles of fairness, dignity, and access to justice for victims. Decisions such as *Maneka Gandhi v. Union of India*, *Bodhisattwa Gautam v. Subhra Chakraborty*, *Delhi Domestic Working Women’s Forum v. Union of India*, and *Laxmi v. Union of India* have significantly advanced victim compensation, legal assistance, protection, and participation in criminal proceedings. The judiciary has also emphasized the State’s responsibility to ensure restorative justice through mechanisms such as victim compensation schemes and victim-friendly procedures. Furthermore, judicial activism has encouraged legislative reforms, influencing provisions in the Code of Criminal Procedure, particularly Section 357A concerning victim compensation. This study critically analyzes these judicial developments to understand how the Supreme Court has reshaped the victim-centric approach within the criminal justice system. It argues that while judicial activism has been instrumental in promoting victims’ rights, challenges such as implementation gaps, lack of awareness, and procedural limitations still remain. The paper concludes that judicial intervention has been a driving force in evolving a more humane and balanced criminal justice system in India that recognizes the rights, dignity, and participation of victims.

**Keywords:** Judicial Activism, Victim’s Rights, Supreme Court of India, Criminal Justice System, Victim Compensation, Access to Justice, Human Rights.

### INTRODUCTION

The criminal justice system of any democratic society aims not only to punish offenders but also to protect the rights and dignity of victims of crime. Traditionally, the Indian criminal justice system was primarily accused-centric, focusing

on safeguarding the procedural rights of the accused rather than addressing the concerns of victims. Victims often remained marginalized participants in the criminal process, having limited opportunities to express their grievances or participate meaningfully in legal

proceedings. Over time, however, the Indian judiciary particularly the Supreme Court has played a transformative role in recognizing and expanding the rights of victims through the doctrine of judicial activism. Judicial activism has thus become a significant force in reshaping the contours of victim justice in India.<sup>2049</sup>

Judicial activism refers to the proactive role played by courts in interpreting the Constitution and laws in order to promote justice, protect fundamental rights, and address legislative or executive gaps. In India, the Supreme Court has frequently invoked its powers under Articles 32 and 142 of the Constitution to develop innovative legal principles and provide remedies that extend beyond the traditional boundaries of statutory law. This activist approach has been particularly significant in the field of human rights and criminal justice, where courts have sought to ensure fairness, dignity, and compensation for victims who were historically neglected by the legal system.<sup>2050</sup>

The evolution of victim's rights in India has been closely linked with the expansion of the right to life and personal liberty under Article 21 of the Constitution. The Supreme Court has interpreted Article 21 broadly to include the right to live with dignity, the right to fair investigation, and the right to speedy justice. These interpretations have enabled the judiciary to acknowledge that victims of crime also possess enforceable rights within the criminal justice framework. Through various landmark judgments, the Court has emphasized that justice cannot be achieved unless the suffering and interests of victims are adequately recognized and protected.<sup>2051</sup>

One of the earliest manifestations of judicial activism in favor of victims' rights can be traced to the development of the doctrine of compensation for victims of state negligence and custodial violence. In *Rudul Shah v. State of*

*Bihar*, the Supreme Court recognized the power of constitutional courts to grant monetary compensation to individuals whose fundamental rights were violated by the state. This principle was further strengthened in cases such as *Nilabati Behera v. State of Orissa*, where the Court held that compensation is an essential remedy for the violation of fundamental rights and forms an integral part of public law remedies. These decisions laid the foundation for recognizing victims as rights-bearing individuals rather than mere witnesses in criminal proceedings.<sup>2052</sup>

Another significant development in the protection of victims' rights emerged through judicial intervention in cases involving sexual offences and crimes against women. In the landmark judgment of *Delhi Domestic Working Women's Forum v. Union of India*, the Supreme Court emphasized the need to provide legal assistance, privacy, and compensation to victims of rape. The Court issued comprehensive guidelines aimed at ensuring that victims are treated with dignity throughout the legal process. Such decisions highlighted the Court's willingness to fill legislative gaps and ensure that the criminal justice system responds sensitively to the needs of victims.<sup>2053</sup>

Judicial activism has also contributed to the recognition of victims' participatory rights within criminal proceedings. Traditionally, criminal prosecutions in India were considered disputes between the state and the accused, leaving victims with a limited role. However, through various judgments, the Supreme Court has acknowledged the importance of victim participation, including the right to be heard at crucial stages of the trial, the right to appeal against acquittal in certain circumstances, and the right to compensation under statutory provisions. These developments were further reinforced through legislative amendments, particularly the introduction of Section 357A of the Code of Criminal Procedure, which

<sup>2049</sup> Upendra Baxi, *The Indian Supreme Court and Politics* (Eastern Book Company, 1980).

<sup>2050</sup> M.P. Jain, *Indian Constitutional Law* (8th edn., LexisNexis 2018).

<sup>2051</sup> *Maneka Gandhi v. Union of India*, (1978) 1 SCC 248.

<sup>2052</sup> *Rudul Shah v. State of Bihar*, (1983) 4 SCC 141; *Nilabati Behera v. State of Orissa*, (1993) 2 SCC 746.

<sup>2053</sup> *Delhi Domestic Working Women's Forum v. Union of India*, (1995) 1 SCC 14.

established victim compensation schemes across states.

Furthermore, the judiciary has increasingly emphasized the concept of restorative justice, which focuses on repairing the harm caused to victims and ensuring their rehabilitation. Courts have recognized that criminal justice should not be limited to punishment alone but must also address the emotional, psychological, and financial needs of victims. This approach reflects a broader global shift toward victim-centric justice systems and aligns with international human rights standards such as the United Nations Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power, 1985.<sup>2054</sup>

In this context, judicial activism has played a crucial role in bridging the gap between constitutional ideals and practical realities within the Indian criminal justice system. By interpreting constitutional provisions creatively and issuing progressive guidelines, the Supreme Court has significantly contributed to the recognition and expansion of victims' rights. This paper seeks to examine the role of judicial activism in shaping victim jurisprudence in India, with particular emphasis on landmark judgments delivered by the Supreme Court. It aims to analyze how judicial interventions have transformed the legal status of victims from passive spectators to active stakeholders in the pursuit of justice.

### **Concept of Victim's Rights in Criminal Justice**

Victim's rights refer to the legal protections and entitlements granted to individuals who have suffered harm due to criminal acts. These rights include access to justice, compensation, protection from intimidation, participation in legal proceedings, and the right to dignity and rehabilitation. The concept is rooted in principles of fairness, restorative justice, and human rights.

Traditionally, the Indian criminal justice system was based on colonial legal principles, where the primary objective was the prosecution and punishment of offenders. Victims were often marginalized, with minimal recognition in legal procedures. However, with the development of human rights jurisprudence and constitutional interpretation, the courts have increasingly acknowledged that victims are central to the administration of justice.

The Supreme Court has emphasized that justice must be comprehensive, addressing both the rights of the accused and the legitimate interests of victims. In several cases, the Court has interpreted Article 21 to include the right to fair treatment and compensation for victims of crime. This progressive interpretation has significantly influenced legislative reforms, including provisions related to victim compensation in the Code of Criminal Procedure.

### **Statement of the Problem**

The traditional criminal justice system in India has long been criticized for being offender-oriented rather than victim-oriented. The primary objective of criminal law was to punish the offender, while the needs, interests, and rights of victims remained largely neglected. Victims frequently experience secondary victimization due to procedural delays, lack of participation in proceedings, and inadequate support mechanisms.

Although legislative reforms and judicial decisions have attempted to address these issues, the practical implementation of victim rights remains inconsistent. Judicial activism has contributed significantly to the recognition and expansion of victim rights in India, yet there is limited comprehensive research analyzing the extent and impact of judicial intervention in this area.

This research seeks to address the gap by examining how the Supreme Court of India, through landmark judgments, has shaped the

<sup>2054</sup> United Nations, Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power, 1985.

development of victim rights and influenced the broader criminal justice framework.

### Research Objectives

The main objectives of the study are:

1. To examine the concept and scope of judicial activism in India.
2. To analyze the historical development of victim rights in the Indian criminal justice system.
3. To study landmark Supreme Court judgments that have contributed to the evolution of victim rights.
4. To evaluate the impact of judicial activism on legislative and policy reforms relating to victim protection.
5. To identify challenges in the implementation of victim rights and suggest possible reforms.

### Research Questions

The research seeks to answer the following questions:

1. What is the role of judicial activism in the Indian constitutional framework?
2. How has the Supreme Court contributed to the development of victim rights in India?
3. What are the major landmark judgments that have shaped victim-oriented jurisprudence?
4. How have judicial pronouncements influenced legislative reforms relating to victim compensation and protection?
5. What challenges remain in ensuring effective protection of victim rights?

### Hypothesis

The study is based on the following hypotheses:

1. Judicial activism has played a significant role in expanding and strengthening victim rights in India.

2. Landmark Supreme Court judgments have influenced legislative reforms and policy measures relating to victim protection.
3. Despite judicial intervention, the effective implementation of victim rights remains limited due to procedural and institutional challenges.

### Scope and Limitations of the Study

The study focuses primarily on the role of the **Supreme Court of India** in shaping victim rights through judicial activism. It examines landmark judgments that have contributed to the development of victim-oriented jurisprudence.

However, the study is limited to doctrinal analysis and does not include empirical research or field studies. Additionally, while High Court decisions may be referred to where necessary, the primary focus remains on Supreme Court judgments.

### Judicial Activism and Its Role in Expanding Victim's Rights

Judicial activism refers to the dynamic and proactive role played by the judiciary in interpreting laws and constitutional provisions to promote justice and protect fundamental rights. In the Indian constitutional framework, judicial activism has been an important tool for addressing gaps in legislation and ensuring that justice is not limited to rigid statutory interpretations. Particularly in the field of criminal justice, judicial activism has significantly contributed to the recognition and protection of victims' rights. Historically, the criminal justice system in India focused primarily on the rights of the accused, often neglecting the interests and welfare of victims. However, through progressive judicial interpretation, the courts have gradually recognized that victims also deserve protection, dignity, and meaningful participation in the justice process.<sup>2055</sup>

<sup>2055</sup> Upendra Baxi, *The Indian Supreme Court and Politics* (Eastern Book Company 1980).

The Supreme Court of India has played a central role in expanding victims' rights by interpreting constitutional provisions in a broader and more humanitarian manner. Articles 32 and 142 of the Constitution have been frequently invoked by the Court to provide effective remedies for victims of crime and state misconduct. Article 32 empowers individuals to approach the Supreme Court directly for enforcement of fundamental rights, while Article 142 enables the Court to pass orders necessary for complete justice. By using these constitutional powers, the Court has developed innovative remedies such as awarding compensation for violations of fundamental rights and directing governments to create schemes for victim rehabilitation.<sup>2056</sup>

A key aspect of judicial activism in this area is the expansive interpretation of Article 21 of the Constitution, which guarantees the right to life and personal liberty. The Supreme Court has repeatedly held that the right to life is not limited to mere physical existence but includes the right to live with dignity, security, and access to justice. On this basis, the Court has recognized that victims of crime are entitled to protection of their dignity, adequate compensation, and assistance from the state. The recognition of compensation as a constitutional remedy in cases of custodial violence and unlawful detention marked a significant shift toward a victim-oriented approach in Indian criminal jurisprudence.<sup>2057</sup>

Judicial activism has also been visible through the development of Public Interest Litigation (PIL), which allows individuals and organizations to approach the courts on behalf of victims who may not have the resources or capacity to seek justice themselves. PIL has played a crucial role in addressing systemic issues such as custodial deaths, sexual violence, and exploitation of vulnerable groups. Through PILs, the judiciary has issued guidelines for the protection of victims, including the provision of legal

assistance, protection of identity in sensitive cases, and establishment of compensation mechanisms. These measures have significantly strengthened the rights and dignity of victims within the criminal justice system.<sup>2058</sup>

Furthermore, the Supreme Court has emphasized the importance of victim participation in criminal proceedings. Traditionally, victims had a very limited role once the prosecution was initiated by the state. However, judicial decisions have recognized that victims have a legitimate interest in the outcome of criminal cases and should be given opportunities to participate in proceedings, seek compensation, and express their concerns. This recognition has contributed to legislative reforms such as the introduction of victim compensation schemes under the Code of Criminal Procedure.<sup>2059</sup>

In addition, the judiciary has addressed emerging issues such as witness protection, victim rehabilitation, and gender-sensitive procedures in cases of sexual offences. Judicial directions have compelled governments to adopt policies that ensure medical care, psychological support, and financial assistance for victims. These measures demonstrate the judiciary's commitment to transforming the criminal justice system into a more humane and balanced framework that acknowledges both the rights of the accused and the needs of victims.

In conclusion, judicial activism has played a transformative role in expanding victims' rights in India. By interpreting constitutional principles in a progressive manner and issuing innovative remedies, the Supreme Court has ensured that victims are no longer marginalized participants in the justice process. These judicial interventions have not only provided immediate relief to victims but have also influenced legislative reforms and policy development, thereby strengthening the overall framework of victim justice in India.

<sup>2056</sup> Constitution of India, Articles 32 and 142.

<sup>2057</sup> *Nilabati Behera v. State of Orissa*, (1993) 2 SCC 746.

<sup>2058</sup> *Delhi Domestic Working Women's Forum v. Union of India*, (1995) 1 SCC 14.

<sup>2059</sup> *Ankush Shivaji Gaikwad v. State of Maharashtra*, (2013) 6 SCC 770.

## Landmark Supreme Court Judgments on Victim's Rights

### Rudul Sah v. State of Bihar (1983)

One of the earliest cases where the Supreme Court recognized the importance of compensation for victims was *Rudul Sah v. State of Bihar*. In this case, the petitioner had been illegally detained in prison for several years even after his acquittal. The Supreme Court held that mere release from unlawful detention was insufficient and that the state must provide compensation for the violation of fundamental rights.

The Court awarded monetary compensation to the victim and established the principle that constitutional remedies could include compensation for victims of state wrongdoing. This decision marked a significant step toward recognizing victims' rights within constitutional jurisprudence.<sup>2060</sup>

### Nilabati Behera v. State of Orissa (1993)

In *Nilabati Behera v. State of Orissa*, the Supreme Court dealt with the issue of custodial death. The petitioner's son died while in police custody, raising serious concerns about state accountability. The Court held that the state is liable to compensate victims or their families when fundamental rights are violated by public authorities.

The judgment emphasized that compensation is an essential remedy under public law and serves as a deterrent against abuse of power by state officials. The Court also clarified that such compensation is independent of private law remedies such as civil suits for damages.<sup>2061</sup>

This decision strengthened the jurisprudence of victim compensation and reinforced the responsibility of the state to protect human rights.

### Delhi Domestic Working Women's Forum v. Union of India (1995)

This case was a milestone in recognizing the rights of rape victims in India. The Supreme Court issued several guidelines aimed at protecting the dignity and privacy of victims of sexual offences. The Court directed that rape victims should receive legal assistance, protection during trial, and compensation through a dedicated scheme.

The judgment highlighted the need for victim support services and emphasized that the criminal justice system must be sensitive to the trauma experienced by victims of sexual violence.<sup>2062</sup>

These guidelines significantly influenced later legislative reforms and the development of victim compensation schemes across India.

### Bodhisattwa Gautam v. Subhra Chakraborty (1996)

In this case, the Supreme Court recognized the right of rape victims to receive interim compensation during the pendency of criminal proceedings. The Court held that rape is not merely a crime against an individual but also a violation of fundamental rights under Article 21.

The Court ordered the accused to pay interim compensation to the victim, recognizing the financial and psychological hardships faced by survivors of sexual assault. This judgment further strengthened the concept of restorative justice in Indian criminal law.<sup>2063</sup>

### Vishaka v. State of Rajasthan (1997)

Although primarily focused on sexual harassment at the workplace, the *Vishaka* judgment significantly contributed to the protection of victims' rights. The Supreme Court laid down guidelines to prevent sexual harassment and protect the dignity of women at workplaces.

The Court emphasized that sexual harassment violates fundamental rights under Articles 14, 15, and 21 of the Constitution. The guidelines remained in force until the enactment of the

<sup>2060</sup> *Rudul Sah v. State of Bihar*, AIR 1983 SC 1086.

<sup>2061</sup> *Nilabati Behera v. State of Orissa*, (1993) 2 SCC 746.

<sup>2062</sup> *Delhi Domestic Working Women's Forum v. Union of India*, (1995) 1 SCC 14.

<sup>2063</sup> *Bodhisattwa Gautam v. Subhra Chakraborty*, (1996) 1 SCC 490.

Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.<sup>2064</sup>

This judgment highlighted the proactive role of the judiciary in safeguarding victims when legislative frameworks are inadequate.

### **Laxmi v. Union of India (2014)**

The case of *Laxmi v. Union of India* dealt with the issue of acid attacks and the need for victim protection and rehabilitation. The Supreme Court issued directions to regulate the sale of acid and ensure compensation and medical treatment for victims of acid attacks.

The Court emphasized that acid attack survivors require long-term rehabilitation, including financial assistance and medical care. This judgment led to the formulation of specific compensation schemes for acid attack victims and strengthened the recognition of victims' rights in Indian law.<sup>2065</sup>

### **Ankush Shivaji Gaikwad v. State of Maharashtra (2013)**

In this case, the Supreme Court emphasized the importance of victim compensation under Section 357 of the Code of Criminal Procedure. The Court held that awarding compensation to victims should not be treated as optional but as an integral part of the sentencing process.

The judgment encouraged courts to consider the needs of victims and ensure that compensation is awarded whenever appropriate. This decision significantly strengthened the implementation of victim compensation provisions in criminal law.<sup>2066</sup>

### **Legislative Developments Influenced by Judicial Activism**

Judicial activism has also influenced legislative reforms aimed at strengthening victims' rights. The Criminal Procedure Code was amended to introduce Section 357A, which provides for victim compensation schemes to be

implemented by state governments. These schemes ensure financial assistance to victims of crime, particularly in cases where the offender is unable to pay compensation.

Similarly, reforms in laws related to sexual offences, including the Criminal Law (Amendment) Act, 2013, were partly influenced by judicial observations emphasizing the need for victim protection and dignity. These legislative changes reflect the growing recognition of victims as key stakeholders in the justice system.

### **Challenges in Implementing Victim's Rights**

Despite significant judicial and legislative progress, several challenges remain in effectively implementing victims' rights in India. Many victims face difficulties in accessing compensation due to bureaucratic delays and lack of awareness. In addition, victim participation in criminal trials remains limited in practice.

Another challenge is the lack of comprehensive support systems such as counseling services, witness protection mechanisms, and rehabilitation programs. Although judicial decisions have emphasized the importance of these measures, their implementation remains inconsistent across different states.

Furthermore, the criminal justice system continues to face structural issues such as delays in trials and inadequate victim assistance programs. Addressing these challenges requires coordinated efforts from the judiciary, legislature, and executive authorities.

### **Conclusion and Suggestion**

The evolution of victims' rights in India represents a significant transformation in the country's criminal justice system. Judicial activism by the Supreme Court has played a crucial role in recognizing and strengthening the rights of victims through progressive interpretations of constitutional principles. Landmark judgments have expanded the scope of justice to include compensation, dignity,

<sup>2064</sup> *Vishaka v. State of Rajasthan*, AIR 1997 SC 3011.

<sup>2065</sup> *Laxmi v. Union of India*, (2014) 4 SCC 427.

<sup>2066</sup> *Ankush Shivaji Gaikwad v. State of Maharashtra*, (2013) 6 SCC 770.

participation, and rehabilitation for victims of crime.

These judicial interventions have not only provided relief to individual victims but have also influenced legislative reforms and policy initiatives aimed at improving victim protection. The recognition of victim compensation, the establishment of support mechanisms for sexual assault survivors, and the regulation of acid attacks are some notable achievements resulting from judicial activism.

However, despite these advancements, challenges remain in ensuring the effective implementation of victims' rights. Greater awareness, institutional reforms, and stronger support systems are necessary to ensure that victims receive timely justice and adequate protection.

Ultimately, a balanced criminal justice system must safeguard both the rights of the accused and the interests of victims. Judicial activism has been instrumental in moving toward this balance, transforming victims from passive observers into recognized participants in the justice process.

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