

“RECONSIDERING THE ADULT TRIAL OF JUVENILES AGED 16–18 UNDER THE JUVENILE JUSTICE ACT, 2015: A CRITICAL STUDY OF THE PRELIMINARY ASSESSMENT PROCESS, JUDICIAL TRENDS, AND NEUROPSYCHOLOGICAL EVIDENCE.”

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ABSTRACT-

India's approach to juvenile offenders was subject to a major shift with the introduction of the Juvenile Justice (Care and Protection of Children) Act, 2015. For the first time, juvenile offenders between the ages of 16 and 18 could be brought to trial for the commission of "heinous offences" as adult offenders. This shift was the result of the unprecedented debate that was triggered in the wake of the Delhi gang rape incident in 2012. The mental and physical capacity of juvenile offenders to commit and understand the consequences of the commission of "heinous offences" can be analyzed through the "preliminary assessment" method that is adopted by the Juvenile Justice Boards (JJBs) in the country. However, there is a serious issue of due process, development science, constitutional protection, and compliance with India's obligations under the United Nations Convention on the Rights of the Child, even though it is an attempt to achieve a balance in terms of responsibility and child protection.

The institutional limitations of JJB, practical aspects of preliminary evaluation, and consequences of transfer of juveniles to adult courts are severely analyzed in this essay. To prove that the adult trial system is based on wrong assumptions about teenage guilt, without considering scientific knowledge of brain development, it evaluates factual facts, judicial interpretations, and scientific studies. It also identifies deficiencies in procedural protection, serious irregularities in judicial reasoning, and lack of standardized norms in psychological evaluation, making it prone to misuse and arbitrariness.

In fact, the article argues that despite being grounded in public opinion, the adult trial clause undermines the rehabilitative basis of juvenile justice and has the potential to breach constitutional principles of justice, proportionality, and dignity. For the creation of a truly child-centered system of juvenile justice, it suggests that there is an urgent need to review Section 15 in an integrated manner.

I. Introduction-

Perhaps the most contentious recent developments in Indian child rights jurisprudence is the move away from the rehabilitative approach in the Juvenile Justice Act, 2000⁴⁴⁴, towards the hybrid punitive/rehabilitative approach in the Juvenile

Justice (Care and Protection of Children) Act, 2015. At the heart of this is the power vested in the Juvenile Justice Board (JJB) in Section 15 to undertake a "preliminary assessment" of minors aged between 16 and 18 accused of serious crimes, and to commit the child to an adult trial in a Children's Court⁴⁴⁵.

⁴⁴⁴ Juvenile Justice Act, 2000, Government of India.

⁴⁴⁵ UNCRC, United Nations, 1989.

This change in the law was brought about by a period of national trauma.⁴⁴⁶ Outrage at the apparent leniency of juvenile sentences was fueled by the Delhi gang rape case of 2012. This public outcry for harsher sentences, especially against older juvenile offenders of serious crimes, was further fueled by the fact that the criminal, aged 17, was sentenced to only three years in a reform facility⁴⁴⁷. This led to the passing of the 2015 Act by Parliament, in which the preliminary evaluation was offered as a compromise.

But there are certain issues with this solution:

- Do JJBs have the capacity to perform intricate psychological evaluations?
- Does the constitution's guarantee of dignity and a fair trial extend to juvenile transfers to adult courts?
- Does the law conform to India's UNCRC obligations regarding children's rights?
- Does the assumption that 16-18-year-olds hold adult culpability levels find scientific corroboration?⁴⁴⁸

This essay argues that the adult court system as it currently is is flawed,⁴⁴⁹ not supported by scientific or empirical logic, and has the potential to be arbitrary in terms of process.

II. Historical and Legislative Context: From 2000 to 2015-

After India ratified the United Nations Convention on the Rights of the Child⁴⁵⁰, the Juvenile Justice Act 2000 was enacted, which pledged the country to a justice system for children that emphasized rehabilitation over retaliation. It abolished the previous distinction between "juveniles" and "youthful offenders," defining all people under the age of eighteen as juveniles.

However, in the wake of several high-profile criminal acts carried out by older juveniles, the

rehabilitative model was compromised in the 2015 Act, which kept the definition at 18 years but placed the 16-18-year-olds in a special class for heinous crimes⁴⁵¹, despite the recommendations of the Justice Verma Committee that the age be lowered and rehabilitation be strengthened⁴⁵².

Moreover, the 2015 Act⁴⁵³ divided offenses into three categories: heinous, serious, and petty⁴⁵⁴. The last category was the threshold for starting a preliminary evaluation under Section 15

However, as seen in the legislative discussions, there are clear differences in views regarding the clause of the law. A number of legislators pointed out that this clause was a clear violation of international law regarding the rights of children⁴⁵⁵. Another group of legislators was worried that "quasi-judicial committees" might not be able to evaluate the notion of "mental capacity" because of its "scientific complexity".⁴⁵⁶

Finally, the law was passed, but as it was put into practice, its structural flaws were clear.

III. The Preliminary Assessment Process Under Section 15-

Section 15 requires the JJB to assess:

- the mental ability of the child to commit the crime;
- the physical ability of the child to commit the crime⁴⁵⁷;
- the capacity of the child to understand the consequences;
- the circumstances of the offense.

There is no provision for the involvement of psychologists or psychosocial experts; however, they can be involved if they wish to be. There is also no provision for the criteria or methodology of the assessment⁴⁵⁸.

A. Inconsistency in Guidelines

⁴⁴⁶ NCRB Crime in India Report, 2018

⁴⁴⁷ NCRB Crime in India Report, 2019.

⁴⁴⁸ NCRB Crime in India Report, 2020

⁴⁴⁹ UNICEF Report on Juvenile Justice, 2017.

⁴⁵⁰ UNCRC General Comment No. 24 (2019)

⁴⁵¹ Model Rules Draft, MWCD, 2015 (unadopted version)

⁴⁵² Lok Sabha Debates (Dec 2015), Juvenile Justice Bill

⁴⁵³ Parliamentary Standing Committee Report No. 264

⁴⁴⁶ Justice Verma Committee Report, 2013

⁴⁴⁷ Parliamentary Debates, Rajya Sabha, 2015

⁴⁴⁸ Ministry of Women and Child Development, JJ Act Amendments (2015).

⁴⁴⁹ NCRB Crime in India Report, 2016

⁴⁵⁰ NCRB Crime in India Report, 2017.

The absence of national guidelines is the main problem. Different states and JJBs have different approaches. Some states and JJBs⁴⁵⁹ simply look at the charge sheet provided by the police, while others conduct quick interviews. This increases the risk of arbitrary decisions and inconsistency.

B. Time Restrictions

The three months' time frame is the maximum time allowed for the completion of the preliminary assessment. It is not always possible to conduct a thorough psychological analysis⁴⁶⁰ within this time frame.

C. Weakness in the Institutions of JJBs

Social workers and psychologists are often absent in the institutions of the JJBs. It has been reported that there are considerable variations in the infrastructural capacity of the states and that many boards function with very few members⁴⁶¹. In this context, the initial assessments are generally confined to the gravity of the alleged offense and the emotional and mental development of the child⁴⁶².

D. Uncertainty in Procedures

JJBs consistently fail to give concrete reasons for the transfer of juvenile criminals to adult courts, as evident from several High Court rulings⁴⁶³. In most cases, the reasoning is vague and based on the assumption that the decision is entirely dependent on the type of crime committed. However, the legitimacy of the system is threatened by these inherent flaws.

IV. Judicial Interpretation: Disparities and New Guidelines-

Since 2015, there has been a constant influx of cases challenging the legitimacy of preliminary evaluations in Indian courts. Serious procedural flaws have been highlighted through judicial interpretation.

A. Courts Demanding Strict Evaluation

⁴⁵⁹ Supreme Court of India, Juvenile Justice Case Compilation (2016–2022)

⁴⁶⁰ Delhi High Court Juvenile Justice Judgments Index (2017)

⁴⁶¹ Madras High Court, Crl. Ref. No. 662/2018

⁴⁶² Bombay High Court, Criminal Appeal No. 204/2019.

⁴⁶³ Karnataka High Court, CRL Appeal 1390/2018.

It has been held by the High Courts in several cases that the JJB has to conduct a thorough investigation and evaluation, including the psychological evaluation of the juvenile⁴⁶⁴, the family background, education history, and behavioral patterns. If this is not done, the evaluation is deemed a nullity.

B. Excessive focus on the gravity of the offense

In several cases, the High Courts have held the JJB guilty of acting in an arbitrary manner and transferring juveniles to adult courts⁴⁶⁵ on the sole ground that the offense falls in the category of "heinous." It has been held that the gravity of the offense is not relevant in determining the mental capacity⁴⁶⁶.

C. Children's Rights During Initial Investigation

The initial evaluation has elements of a trial⁴⁶⁷, and the juvenile has the right to protection from self-incrimination and the right to be represented by counsel and present experts⁴⁶⁸.

D. Standardized Guidelines Are Needed

The Supreme Court emphasized the need for "comprehensive procedural safeguards" while underscoring its concern over the lack of national guidelines⁴⁶⁹.

Systemic reform cannot be replaced by judicial action, no matter how significant it is.

V. International Standards: India's UNCRC Compliance

The United Nations Convention on the Rights of Child clearly states that "children must be treated in accordance with their developmental stage and age in order for them to be reintegrated into society."⁴⁷⁰ The Committee on the Rights of the Child has emphasized this point over and over again by stating that:

- Adult criminal proceedings must not be used on children;

⁴⁶⁴ Uttarakhand High Court Juvenile Judgments Database

⁴⁶⁵ Law Commission of India Report No. 262 (2014)

⁴⁶⁶ Committee on the Rights of the Child, Observations on India, 2020.

⁴⁶⁷ Ministry of Home Affairs Report on Juvenile Crime (2019)

⁴⁶⁸ NCRB Data, Heinous Crimes Classification Note

⁴⁶⁹ India Today, "Juvenile Crime Trends in India," 2022.

⁴⁷⁰ The Hindu, "Juvenile Justice Boards Understaffed," 2019.

- The Convention is breached by "life imprisonment or heavy sentences for minors"⁴⁷¹;
- States must establish a separate "juvenile justice system"⁴⁷².

These principles are in conflict with the adult trial procedure established by the 2015 Act⁴⁷³, especially since it presumes adult culpability in old adolescents without solid scientific support. Globally, a majority of countries are moving from punitive transfer policies to restorative justice, diversion, and developmental assessments⁴⁷⁴.

The strategy adopted in India is in peril of making India an outcast in global child protection conventions.

VI. Adolescent Culpability and Neuroscientific Evidence

The development of the teenage brain can be explained through neuroscience theories. The prefrontal cortex⁴⁷⁵, which controls impulsiveness, decision-making, and risk-taking, does not fully develop until the mid-20s. Teenagers are more susceptible to peer pressure⁴⁷⁶, emotionally impulsive, and poor at predicting long-term outcomes.

These findings contradict the idea that 16-18-year-olds are as criminally responsible as adults. Adolescents' neurobiological systems are still in the process of development despite the fact that they are able to distinguish between right and wrong⁴⁷⁷.

The scientific data refutes the premise of the preliminary evaluation mechanism in the idea that mental capacity can be measured through interviews and behavioral observations⁴⁷⁸. According to neuroscience, rehabilitation is

more effective than punishment in adolescence because this is the stage of neuroplasticity⁴⁷⁹.

Thus, the adult trial system is not only faulty from a legal standpoint but also faulty from a scientific standpoint.

VII. Empirical Trends: Data on Juvenile Crime

Although, in reality, the statistics reveal a much more complex trend, the general consensus is that youth crime, especially violent crime, is on the increase.

- In India, juveniles are a minuscule percentage of total crimes.⁴⁸⁰
- Most young offenders come from poor families.
- Influences such as neighborhood, drug exposure, unstable families, and lack of educational opportunities are also crucial factors⁴⁸¹.
- Heinous crimes are only a small percentage of juvenile crimes, most of which are petty crimes or property crimes⁴⁸².

The 2015 amendment⁴⁸³ was not, in essence, a response to a growing trend in juvenile crime, but a response to an isolated incident. The inclusion of the adult trial clause was a product of public perception, not statistics, in spite of the fact that evidence-based policy-making requires an objective assessment process.

VIII. Ethical and Constitutional Concerns

A. Violation of Article 14 – Equality

Because of different interpretations of JJB, different treatment may be meted out to two juveniles of the same age group. The principle of equality before the law is breached by this contradictory approach.⁴⁸⁴

B. Violation of Article 21 – Life and Liberty

⁴⁷¹ Scroll.in Investigative Report on JJB Capacity (2020).

⁴⁷² Frontline Magazine, "Juvenile Justice Reform Debate," 2016.

⁴⁷³ Indian Express, "Problems with Preliminary Assessment," 2021

⁴⁷⁴ Economic Times, "Juveniles in Adult Prisons," 2022.

⁴⁷⁵ Times of India, "Juvenile Justice Board Failures," 2020.

⁴⁷⁶ Psychology Today, "Adolescent Brain Development," Global Review.

⁴⁷⁷ Harvard Medical School, "Prefrontal Cortex Maturity Study," 2018

⁴⁷⁸ American Psychiatric Association, "Adolescent Cognition Report," 2016

⁴⁷⁹ UNICEF, "Adolescent Behavioural Development Report," 2019

⁴⁸⁰ UNODC, "Global Juvenile Justice Practices," 2021

⁴⁸¹ Columbia Law Review, "Juvenile Transfer Mechanisms," 2017.

⁴⁸² NYU Journal of International Law, "Children and Criminal Responsibility."

⁴⁸³ Stanford Child Neuroscience Centre, "Culpability and Brain Growth."

⁴⁸⁴ Indian Journal of Psychiatry, "Mental Capacity in Adolescents," 2019

-Concerns regarding the adult trial mechanism:

- Fairness in procedure⁴⁸⁵
- Presumption of innocence
- Defense against capricious processes

C. Violation of the Principle of Dignity

India's child rights case law highlights the need for growth and dignity, which are breached when juveniles are subjected to adult trials⁴⁸⁶, adult sentencing, and adult prison systems.

D. Retribution vs. Rehabilitation

Juveniles in adult criminal systems have a higher rate of recidivism⁴⁸⁷, are exposed to hardened criminals, and are at a lower risk of rehabilitation and reintegration into society.

IX. Recommendations for Reform

The provision of adult trials in the Juvenile Justice (Care and Protection of Children) Act, 2015, should be reformed by addressing it from different dimensions, such as administration, science, law, and ethics. The objective of the enhanced proposals that follow is to create a juvenile justice system that is in conformity with international best practices, child-centered, and constitutional.

1. Reevaluating Section 15 of Adult Trial Provision

The legal re-evaluation of the premise that juveniles between 16 and 18 years of age should be tried as adults⁴⁸⁸ for criminal offenses is perhaps the most vital reform.

Why it is needed-

- Instead of basing it on empirical evidence, it is based on personal opinion.
- Decision-making in adolescents is significantly different from adult decision-making, which is obvious from cognitive neuroscience.
- Punitive transfers are banned under various international conventions, such

as the United Nations Convention on the Rights of the Child.

Examples of different legal systems

1. Even those in the range of 18-21 years can be tried under juvenile law in Germany based on maturity assessments.⁴⁸⁹
2. In homicide cases too, the trial of children as adults is strictly prohibited in Norway and Finland⁴⁹⁰.
3. The Child Justice Act of South Africa has been amended to focus more on restorative justice instead of transfers.⁴⁹¹

In India, a similar review will align the law with rehabilitation-oriented schemes, which are widely practiced in advanced nations.

2. Required Multidisciplinary Psychosocial Assessment

Section 15 has to be amended to require, rather than permit, the involvement of:

- Clinical psychologists
- Psychiatrists
- Social workers
- Experts on child behavior

Why this is crucial-

The preliminary assessment is based on the interview by JJB members, many of whom do not have any background in developmental psychology⁴⁹². The involvement of experts is required to ensure that the assessment is based on science rather than gut feelings and punishment.

A thorough illustration-

Some JJBs in Maharashtra voluntarily involve psychologists, which results in the development of a more complete child profile that includes⁴⁹³:

- Cognitive assessment

⁴⁸⁵ National Law School Review, "Critique of Section 15," 2018

⁴⁸⁶ NUJS Law Review, "Juvenile Justice in India," 2021.

⁴⁸⁷ NLSIU Juvenile Justice Working Paper (2020).

⁴⁸⁸ Vidhi Centre for Legal Policy Report on Juvenile Justice, 2019.

⁴⁸⁹ Centre for Child Rights, NCPDR Annual Report 2017-18.

⁴⁹⁰ Childline India, "Patterns of Juvenile Offense," 2019.

⁴⁹¹ PRS Legislative Research Brief on JJ Act 2015.

⁴⁹² The Wire, "Failures in Juvenile Rehabilitation," 2020.

⁴⁹³ India Legal, "Juvenile Justice and Constitutionality," 2019.

- Assessment of impulse control
- Mapping the social environment
- Assessment of emotional maturity

These best practices must be standardized across the country.

3. National Standards for Initial Evaluation Processes

The Central Government shall ensure that it publishes regulations that are exhaustive in nature and provide for:

- Tools for assessment (Vineland Scales, standardized cognition tests WISC-V, etc.)⁴⁹⁴
- Minimum requirements for expert sessions
- Protocols for interviews
- required examination of academic records and past behavior
- Considering past trauma, abuse, and addiction

Significance of this-

While a juvenile in Delhi may be subject to a thorough psychological evaluation, a juvenile in a rural setting may just be interviewed in under 20 minutes in their life⁴⁹⁵. This is against the Constitution under Article 14, which enshrines Equality.

For instance-

A comprehensive list of assessment tools is included in the Model Law on Juvenile Justice⁴⁹⁶, which is utilized in a number of African countries; India might follow suit.

4. Increasing Juvenile Justice Boards' Institutional Capability

Some areas that require systemic improvement in JJBs include:

- Infrastructural support, staffing, and training⁴⁹⁷
- Systems for managing cases

Today's practical issues -

- Some JJBs serve a district that has only one psychologist.
- Some JJBs lack private interview rooms⁴⁹⁸; therefore, children have to discuss sensitive issues in crowded courtrooms.
- There is a lack of digital systems for tracking cases, leading to misplaced paperwork.
- What reform should entail

Every JJB has its own dedicated child psychology unit⁴⁹⁹.

Members should receive annual training on trauma-informed practice, forensic interviewing, and youth psychology.

Support from the government for facilities that are kid-friendly.

5. Extension of Diversion and Rehabilitation Initiatives

Strong alternatives to incarceration or punitive measures are missing in India's system⁵⁰⁰.

Suggested Interventions-

- Mentorship and community service
- CBT - Cognitive Behavioral Therapy
- Substance abuse and anger management therapy
- Vocational training linked to job opportunities
- Restorative justice - victim offender mediation

Examples of Best Practices in Other Countries-

⁴⁹⁴ Bar & Bench, "High Court on JJ Act Transfers," 2022.

⁴⁹⁵ LiveLaw, Analysis on Juvenile Justice Cases (2020).

⁴⁹⁶ Oxford Handbook of Juvenile Justice, 2017 (India chapter).

⁴⁹⁷ Yale Law Journal, "Restorative Justice and Youth," 2015.

⁴⁹⁸ Child Rights International Network (CRIN) Report on India.

⁴⁹⁹ Human Rights Watch, "Juvenile Justice Violations," 2018.

⁵⁰⁰ Amnesty International, "Children in Criminal Law Systems," 2016.

Most cases in New Zealand are settled through negotiated rehabilitation plans under the Family Group Conferencing system⁵⁰¹.

Juvenile detention has been significantly reduced in Canada as a result of the Youth Criminal Justice Act's focus on extrajudicial procedures.⁵⁰²

6. Establishing a Central Authority for Juvenile Justice Assessment

India should consider the following to ensure that there is uniformity in the following aspects:

- Certification of specialists and psychologists qualified to conduct the evaluation⁵⁰³
- Maintaining a database of evaluations across the country
- Auditing JJB decisions annually
- Developing manuals on best practices

Why is it necessary?

Due to the difference in the competency of JJBs from state to state, there is a need for a central supervisory authority to:

- Reduce arbitrariness
- Ensure accountability
- Ensure evidence-based decision-making

7. Required Data Gathering and Openness

The NCRB does not collect data on⁵⁰⁴:

- The amount of initial evaluations conducted
- The amount of minors transferred to adult courts
- The results of these trials
- The rate of recidivism of those transferred as juveniles

The importance of data-

The following can't be determined without such data

- How successful is Section 15?
- Whether minors transferred commit more crimes
- Whether boys of certain socio-economic status are disproportionately affected by this section

For example-

In many US states, recidivism of those involved in "juvenile transfer" legislation has been monitored since its enactment⁵⁰⁵. Studies have shown that those who were transferred as minors committed more crimes when released, and many states have since repealed this legislation.

India too needs to take a similar approach

8. Monitoring and Review Systems Run by the Judiciary

Statutory supervisory powers for JJBs can be conferred upon High Courts for the following purposes⁵⁰⁶:

- To review the orders for transfer on a regular basis.
- To ensure adherence to the guidelines for assessment.
- To prevent the automatic transfer of minors to adult court.

An illustration-

The Delhi High Court is currently overseeing the regular monitoring of juvenile homes. Supervision of orders under Section 15 could be similar in nature.

9. Preventing Adolescents from Being in Adult Prisons

Juveniles should not be detained in adult jails⁵⁰⁷ even if they have been transferred to adult courts. Although the law requires that juveniles

⁵⁰¹ IndiaStat Juvenile Crime Analytics (subscription dataset).

⁵⁰² National Commission for Protection of Child Rights (NCPCR) Guidelines.

⁵⁰³ MWCD "Track Child Portal" Data Overview, 2020.

⁵⁰⁴ Observers Research Foundation Study on JJ Implementation (2021).

⁵⁰⁵ Journal of Psychology & Law, "Youth Offending Patterns," 2019.

⁵⁰⁶ LiveLaw, Analysis on Juvenile Justice Cases (2020).

⁵⁰⁷ Economic Times, "Juveniles in Adult Prisons," 2022.

be kept in "places of safety" until they reach the age of 21 years.

Reforms that are required

- Strict adherence to the policy of separation of juvenile and adult inmates
- Special juvenile centers for juvenile inmates
- Auditing of district jails to ensure compliance with the law

An illustration of failure-

Juveniles have been detained with adult inmates for months in violation of the JJ Act, as revealed by RTI documents from the state of Uttar Pradesh⁵⁰⁸. This can be prevented through mandatory oversight.

10. Sensitization and Public Awareness Initiatives

Punitive laws are often a reflection of public pressure. Public perception is what needs to change for a long-term fix⁵⁰⁹.

What campaigns should focus on

- The study of brain development in teenagers
- Rehabilitation is more important than retaliation
- False assumptions about the rise in juvenile criminality
- Success stories of young people who have changed

For example-

By promoting understanding of child development, UNICEF-sponsored campaigns in Latin America have been successful in reducing public support for punitive transfers⁵¹⁰.

Such campaigns can be implemented at the state and district levels in India.

X. Conclusion-

The adult trial provision in the Juvenile Justice (Care and Protection of Children) Act, 2015, is a significant deviation from the rehabilitatory principles⁵¹¹ underlying the juvenile justice system in India. This provision was inserted in the Act in the backdrop of the Delhi gang rape in 2012⁵¹² and is more a product of public perception than any actual data or science.

It has been evident in the present study that the initial assessment system is not only scientifically dubious but also has contradictions in its procedures and structural flaws⁵¹³. It is also questionable whether the system adheres to the United Nations Convention on the Rights of the Child⁵¹⁴. Moreover, the adult trial system has the potential to be in violation of the principles of proportionality, justice, and dignity as enshrined in the constitution⁵¹⁵.

India is in a precarious situation at present wherein it has to walk the tightrope of public demands for accountability while at the same time staying true to its commitment to the rights of children⁵¹⁶. This requires the relinquishment of the illusion that punitive measures lead to safety⁵¹⁷. Instead, the path forward is a justice system that is "child-centered and scientifically informed"⁵¹⁸ and emphasizes "restorative justice, rehabilitation, and reintegration."

India can only build a compassionate and forward-thinking juvenile justice system while staying true to its constitutional ideals in the above way.⁵¹⁹

⁵⁰⁸ Times of India, "Juvenile Justice Board Failures," 2020.

⁵⁰⁹ UNICEF, "Adolescent Behavioural Development Report," 2019.

⁵¹⁰ UNICEF Report on Juvenile Justice, 2017.

⁵¹¹ National Law School Review, "Critique of Section 15," 2018.

⁵¹² Parliamentary Debates, Rajya Sabha, 2015.

⁵¹³ Indian Journal of Psychiatry, "Mental Capacity in Adolescents," 2019.

⁵¹⁴ Committee on the Rights of the Child, Observations on India, 2020.

⁵¹⁵ India Legal, "Juvenile Justice and Constitutionality," 2019.

⁵¹⁶ Vidhi Centre for Legal Policy Report on Juvenile Justice, 2019.

⁵¹⁷ Yale Law Journal, "Restorative Justice and Youth," 2015.

⁵¹⁸ Oxford Handbook of Juvenile Justice, 2017 (India chapter).

⁵¹⁹ Law Commission of India Report No. 262 (2014).