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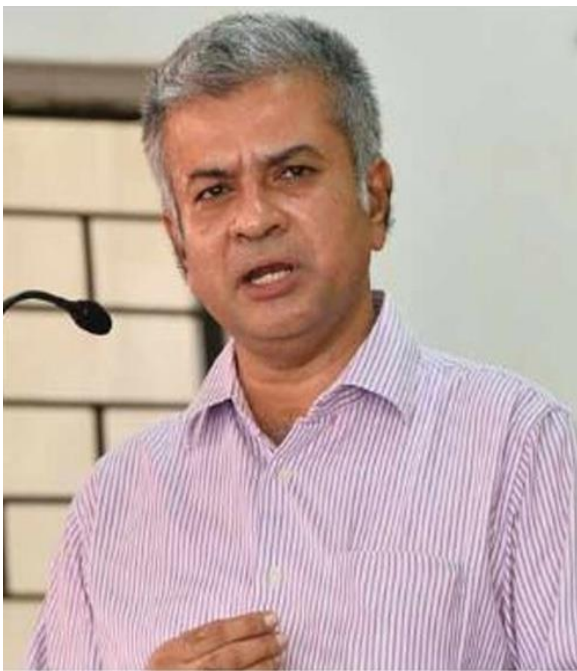
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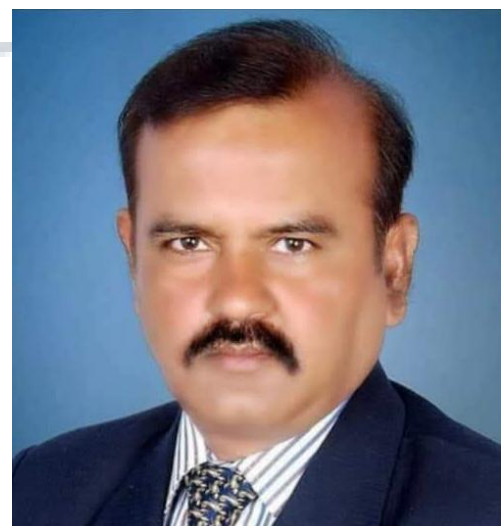
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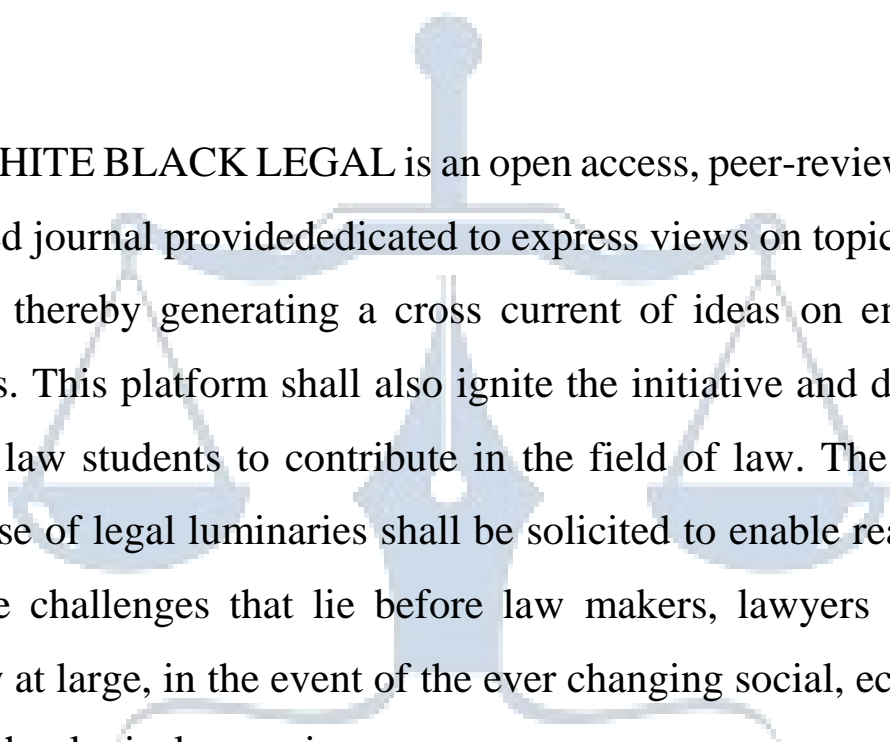


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ABOUT US



WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal provided dedicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you



JUVENILE OFFENDERS AND MEDIATION: A SHIFT TOWARDS ALTERNATIVE JUSTICE

AUTHORED BY - ANANYA PANDE

ABSTRACT

"Alternative Dispute Resolution" has grown in popularity since the 1970s. We've begun employing this approach in a variety of dispute instances in recent years. As a result, (ADR) has become a widely recognised method of resolving disputes. Though there was considerable doubt at first, it is in no way a threat to the current court system. It is just an extra method that distributes the judicial load in order for the latter to devote its valuable time to more challenging concerns. Until recently, this approach was widely employed in civil cases. It is presently being utilised in the administration of criminal justice, with the scope being expanded to include Juvenile Justice.

INTRODUCTION

Alternative Dispute Resolution or ADR is a mechanism or a process that renders the parties in dispute to amicably reach to a settlement and thereby without entering the traditional process of solving the conflict by reaching the courts. It can be seen that the pendency of courts cases and suits has increased as result of which the disposal of cases through ADR Mechanism and gained importance, not only in India but throughout the world in various jurisdictions.

"ADR is generally classified into five types: negotiation, mediation, collaborative law, arbitration and conciliation."

'Juvenile' is word that is derived from a Latin word 'juvenis' which means young. The aim of the Juvenile Justice System is to protect all the children, by bringing within its ambit, *"the children in need of protection, besides those in conflict with law"*. However, it is often seen that this concept is often used interchangeably with 'delinquency' which conjures up an image of violent children who might be in conflict law which is often the case.

Since a long period of time the punishment involving the Juveniles were being addressed through the traditional juvenile system, but in recent decades this practice has witnessed a major turn. ADR and the Criminal Justice systems were viewed as totally different concepts

but now their convergence can be seen and; this has revamped the justice system especially with respect to the Juvenile Offenders. Hence for the offenders to become a productive member of his or her community, the practice of philosophy of rehabilitation by way of Mediation Mechanism of Alternative Dispute Resolution is the best suitable way to punish as well as help in the development of the offender.

REVIEW OF LITERATURE

- **Malhotra O.P., The Law And Practice Of Arbitration And Conciliation, 2006 Edition.**

“The book is a section wise commentary on Arbitration and Conciliation Act, 1996 covering all aspects of Arbitration law and Includes commentary on the Arbitration and Conciliation (Amendment) Act, 2015. The historical background on the evolution of Arbitration since the pre-British era is a unique feature of this work.”

- **Soni Sonali, Adr Mechanism In India - Challenges And Way Forward, Volume I Issue III, July 2020.**

“This paper discusses that ADR has been a bit helpful in speedy dispute resolution. In today world, ADR is extremely supportive for businesses and firms in successfully resolving their disputes. Today as courts are overburdened with lots of cases, ADR mode for resolution is being adopted. They have been helpful to courts to an extent. Through arbitration, mediation, negotiation and conciliation, many commercial and civil disputes are resolved effectively, in cost effective way and in least time but still it is not completely effective.”

- **“Mark S. Umbreit, Restorative Justice Through Victim-Offender Mediation: A Multi-site Assessment, 1 Western Criminology Review 1 (1998).**

This piece of literature was very helpful and provided an overall data and information on utilising Victim-Offender Mediation Programme (VOMP) in the juvenile cases and its efficiency thereupon.

RESEARCH OBJECTIVES

The objectives of the study are as follows:

- To understand the Converging line between Juvenile System and ADR
- To analyse the Mediation Mechanism with respect to Juvenile System
- To understand the meaning of Victim-Offender Mediation Programme (VOMP).

RESEARCH QUESTIONS

- What is the converging line between Juvenile System and ADR?
- What is importance of the Mediation Mechanism with respect to Juvenile System?
- What is Victim-Offender Mediation Programme (VOMP)?

RESEARCH METHODOLOGY

RESEARCH DESIGN

The major issue this project topic deals with is to determine whether the mechanism of mediation can come to rescue of the present system with regards to treatment of juvenile offenders. In contemporary world, ADR techniques, specifically mediation, is perceived as a popular mechanism in international realm to resolve disputes of criminal nature dealing in juvenile justice programs.

METHODOLOGY ADOPTED

The present study is based on secondary sources which includes books, e sources, newspaper journals and research articles.

LIMITATION OF STUDY

The Scope of study has been limited to Indian Juvenile Justice System. Hence the study is limited to the geographical area of India.

CHAPTER - 1

ADR IN JUVENILE SYSTEM: NEED OF THE HOUR

Legal Framework

According to the provisions of the Indian Constitution, the Juvenile System in India is woven around *Articles 15(3), 39 (e) & (f), 45 and 47*. Along with various International covenants such as “*International Covenant on Civil and Political Rights, 1966*”, “*The United Nations Standard Minimum Rules for the Administration of Juvenile Justice, 1985(Beijing Rules)*”, “*The United Nations Rules for the Protection of Juveniles Deprived of their Liberty, 1990(Havana Rules)*”, “*The United Nations Convention on the Rights of the Child (CRC), 1989*”, “*The United Nations Guidelines for the Prevention of Juvenile Delinquency, 1990(Riyadh Guidelines)*” and “*The United Nations Guidelines for Action on Children in the Criminal Justice System, 1997*”.

The traditional form of rendering justice and seeking justice points us towards the state of affairs. This form of justice often leads the victims and the offenders into such a system which does not involve restorative or adversarial justice because the judges decide the case by looking at the facts and the gravity of the offence committed by the offender and punishes him/her accordingly. The focused intention of the of justice system should be to form “*an example for the society*” that discourages “*others from following the same path*”, more importantly to the system should aim “*to punish the individual of the crime that he/she has committed against the state*”¹

Judicial Perspective

There are various cases such as *Re Gaultwas*² where it was decided that “*new protections should be provided under juvenile justice system such as notice of specific charges, assistance of counsel, protection against self- incrimination and the ability to appeal.*”

Thus confirming the stance of Judiciary of looking at the children victims and offenders as different subjects than adults. The juvenile justice system is completely modeled in such a way that it serves the “*best interest of the child*” which is a completely different system as compared to the traditional justice system.

The cases resolved within this framework must lead to rehabilitation and the avoidance of recidivism, rather than punishment. This method has a higher chance of keeping a juvenile from turning into an adult offender. Several states proclaim to be shifting from a punitive to a rehabilitative approach. Therefore to honour this shift, the use of “*alternative dispute resolution tools*” are put in place in an attempt to “*keep the juvenile out of the criminal justice system*”.³

The most sought for solution while looking into ADR mechanism for child ‘delinquents’ is Meditation because it is a better way to resolve a dispute in the individual cases.

¹ “Juvenile Justice (Care and Protection of Children) Act, 2015, Ed. 2016.”

² 387 U.S. 1 (1967)

³ “Ved Kumari, The Juvenile Justice (Care and Protection of Children) Act 2015 - Critical Analysis, 2017, Universal Law Publishers, Lexis Nexis.”

CHAPTER – 2

MEDIATION AND CRIMINAL JUSTICE MECHANISM: AN

ANALYSIS

Mediation acts as a developmental tool which seeks to bring the parties to an amicable solution. The aim of the mediator is to resolve the dispute between the parties in order to reach a mutually agreed settlement, and reach to practical and sustainable solution by serving the best interest of parties to the dispute. This is the reason “*Mediation is the most sought after form of ADR, where the issue of criminal justice is concerned*”⁴.

Criminal Trial

The use of ADR proceedings in the Indian Courts has expanded dramatically as a result of the advantages they give. It provides for a speedy trial, is a confidential process, and is a cost-effective means of resolving conflicts. As a consequence, it solves the vast majority of the challenges that litigation as a settlement mechanism presents. The *Malimath Committee* conducted a study into the judicial structure in an effort to decrease the backlog of lawsuits in Indian courts. The Committee suggested that the "Indian Criminal Justice Mechanism" use a plea negotiation mechanism to accelerate case disposal, minimise court workload, and guarantee that individuals get justice at the lowest possible cost in terms of time and money.

•The Right To A Speedy Trial

In accordance with *Article 21 of the Constitution*, there is indeed a right to a speedy trial. However, residents are denied their right to a timely trial due to unreasonable delays, making the trial process even longer.

•Obligation Under the Constitution

The of the Constitution's preamble mandates that the state provide social, economic, and political justice for all its residents, hence speedy justice is a given under the law. It is the duty of the state to seek to reduce the disparities between various groups of people [*Art 38 (1)*]. This is further clarified by stating explicitly that:

Key Features Of Mediation Process In Cases Of Juveniles

The importance of Mediation is immense, hence it is important to note few pointers with respect

⁴ “Douglas E. Abrams, Reforming Juvenile Delinquency Treatment to Enhance Rehabilitation Personal Accountability and Public Safety, 84 Oregon law review 1005 (2005).”

to this which was also highlighted in the case of *Pratap Singh vs State Of Jharkhand*⁵:-

- **“Neutral Expert:** *Mediation is a process in which an expert neutral, mandatorily appointed, helps the disputants to reach an enforceable agreement that resolves their dispute.*
- **Voluntary:** *It is voluntary. Thus, either party can terminate it at any time without any adverse consequence.*
- **Decision-Making Power:** *The decision-making is in the hands of the parties themselves, who are the main participants.*
- **Confidentiality:** *The proceedings are carried out in such a way that all the proceedings remain confidential.*
- **Time and Cost:** *Disputes are usually resolved in a matter of weeks, and the cost is far less than in litigation.*
- **Larger Interests:** *Rights of the parties are placed in the perspective of long term and larger interests.”*

Due to these pointers of importance of Mediation is immense especially if it involves Juvenile Delinquents.

Techniques of Mediation Mechanism

There are different kinds techniques used in Mediation Mechanism which are generally used in the in the criminal justice system in order to resolve the conflict.

1. **Victim-Offender Mediation Programs (VOM):** The purpose of this kind of program is basically to promote a face to face conversation among the victim and the offender. The aggrieved person gets an opportunity to seek question in relation to the crime committed against him, while addressing the trauma faced due to the crime and thereby seek best assistance possible⁶.
2. **Community Dispute Resolution Programmes (CDRP):** This program seeks get rid of, from those kinds of minor conflicts that might be jamming the criminal dockets.
3. **Victim-offender Panels (VOP):** This mechanism came into existence only few decades earlier as a result of victim rights movement. This mechanism, campaigns against the *“drunk driving by providing the convicted drunk drivers with a chance to appreciate human cost and implication of drunk driving on victims and survivors”*.

⁵ Appeal (crl.) 210 of 2005

⁶ “Mark S. Umbreit, Restorative Justice Through Victim-Offender Mediation: A Multi-site Assessment, 1 Western Criminology Review 1 (1998).”

Thus like VOM it aims to reduce the likelihood of repeat offenses.⁷

4. Community Crime Prevention Programs: This mechanism includes various activities, like “*media anti-drug campaigns*”, “*silent observer programs*”, and “*neighbourhood dispute resolution programs*”.⁸
5. Private Complaint Mediation Service (PCMS):
6. This technique allows for the mediation of criminal misdemeanour issues amongst private persons as a potential substitute to the conventional court procedure. Apart from the above programmes, there are also available the mechanism of “sentencing circles”, “ex-offender assistance”, “community service”, “school programs”, and “specialist courts”.⁹

THEORY OF RESTORATIVE JUSTICE

Meetings and discussions are used in restorative justice to attribute accountability for wrongdoing and come up with a solution that is acceptable to all three parties. More crucially, it speaks directly to victim needs, emphasising the private aspects of a public injustice. It is not a replacement for the official criminal justice system, but it is an useful backup for reducing its burden and improving the system's overall sense of justice. It examines the requirements of crime victims that are now beyond the purview of criminal justice, resulting in victim dissatisfaction and alienation from the system.

Elements of Restorative Justice

1. **Restoration**: If the perpetrator attempted, even if only partly, to make amends by restitution, he could feel vindicated.
2. **Accountability**: The sufferer would appreciate the system if it could convince the perpetrator to take responsibility and change his ways. Restorative justice tries to fulfil victim's requirements and help maintain relation while enforcing offender's liabilities.
3. **Community Protection**: In other words, in an endeavour to reconcile and mend injustice, justice should interact with victims, offenders, and right-thinking members

⁷ “Stephanie Turner, Fresh Start for Young Offenders, 3, October, 2011, available at http://policyprojects.ac.nz/stephanieturner/files/2011/10/A-Fresh-Start-forYouth-Offenders_S-Turner.pdf, accessed on 02:54 PM, 24 Feb, 2020.”

⁸ “Australian Institute of Criminology, Evaluation of alternative dispute resolution initiatives in the care and protection jurisdiction of the NSW Children’s Court, Research and Public Policy Series 118 (2012).”

⁹ “Lode Walgrave, Restoration in Youth Justice, 31 youth crime and youth Justice: comparative and cross-national Perspectives 552 (2004).”

of the community. The requisite protection in the society or community of the victim is providing.

- 4. Skill Development:** The victim is exposed to skill development programme to make him/her independent in every aspect.

All the mechanism points towards a major change in the system from punishment driven, to solution driven thereby indicating the importance of restorative justice. It is pertinent to note that in the case of young offenders the most sought for mechanism in India as well as around the world is the Victim-offender Mediation programme.¹⁰

CHAPTER – 3

VICTIM-OFFENDER MEDIATION PROGRAMME (VOMP) APT FOR JUVINILE CASES – CRITICAL ANALYSIS

This program/technique involves a meeting between the perpetrator and the sufferer, which is facilitated by a skilled mediator. The victim and the perpetrator are given the chance to express their thoughts and views with the support of VOM, and then attempt to settle the dispute and develop their own method to attaining justice in the light of the offence. It allows them to clear up any misconceptions they may have. The goal of the meeting is to come to an agreement on what measures the perpetrator can take to restore the victim's damage. In this sense, the procedure advances the notion of restorative justice in criminal law.¹¹

• Process to VOMP

It is important to note that There are four stages to the process: "case referral and intake, mediation preparation, mediation, and any required follow-up (e.g., enforcement of restitution agreement)".¹² A case is usually submitted to VOMP after a conviction or formal acknowledgement of guilt in court of law. However some cases are directed before then in order to prevent prosecution.

To start with the mediation, the mediator needs to guarantee that:

- Both parties are mentally adept of making the mediation a positive experience;
- The victim would not be injured as a result of the session; and

¹⁰ "Dr. S.S. Srivastava, page no 319, Central Law Agency, 3rd Edition, 2007."

¹¹ "Apoorva, "The Juvenile Justice Bill, 2015: All you need to know", retrieved from <http://www.prsindia.org/theprsblog/juvenile-justice-bill-2015-all-you-need-know>, accessed on 04:38 PM, February 02, 2020."

¹² "Can Alternative Dispute Resolution Fix the Juvenile Justice System?, Nicole Shoener, LegalMatch Legal Writer, <https://legalmatch.typepad.com/criminallaw/2014/11/can-alternative-dispute-resolution-fix-the-juvenile-justice-system.html>, accessed on 10:15 AM, 12th Feb 2020."

- Both sides know that participation is optional.

The system of VOM is designed such that, that it doesn't focus on the guilt of the person rather, its focus is on determining that what sort of effect such a crime can have on the lives of both the parties in such dispute.

- **Significance In Juvenile Justice**

1. *More Responsive* - By providing an environment where standard problem-solving is not only possible, but also encouraged, the perpetrator will become more responsive to dispute resolution methods and develop social communication skills. The offender may have the opportunity to manage his or her concerns and understand to have a say in his/her own interests by seating across the other party in the supervision of a mediator.
2. *Interest of all Parties* - Because one of the most basic tasks in mediation is to establish the interests of all parties, an offender participating in mediation will begin to acquire new hopes that his or her wishes will be identified and met. As a result, the offender may discover that participating in this new method of dispute resolution might lead to success in achieving his or her goals.

It is important to take note that VOM is a system which is based on conversing with the parties by making them feel empowered and bringing justice for the victim by holding the offender accountable for the acts committed by him. The VOM system of Mediation is completely different from the normal mediation which thrives on providing justice to the victim by providing compensation.¹³ Through VOM the Victims develop a sense of empathy for the offenders, which in turn might lead to prevention of committing a crime by a delinquent, hence this system of development is far better when providing justice to the victim.

* **ANALYSIS** *

At times the victim is not able to put forth their grievances and this system could be used as against them by the offenders as a delay tactic in order to run from the entire system and punishment provided by the system. As a result, the perpetrator may or may not consent to VOMP for legitimate reasons. He could be under duress to come to an arrangement, instead of sincerely attempting to undo the suffering he has caused.

¹³ "Use Of The Indeterminate Sentence In Crime Prevention And Rehabilitation, 7 duke law Journal 65, 71 (1958)."

Another criticism against mediation is that it happens on the “equal footing” because assertion of power will be highly problematic. This situation has been helped in the case of *Sathyavani Ponrani v Samuel Raj*¹⁴ it was stated by the court:

“That the survivors of rape have an opportunity to be heard, and have more participation in the process, otherwise the matter is primarily between the state and the accused. Active participation of the survivor in dispensing criminal justice can be secured by ensuring that a special public prosecutor is appointed if the case warrants so; by allowing applications to assist the prosecution; by ensuring that the survivor is represented through a counsel at all stages of the process and that there is appropriate mechanism for witness protection”.

Hence it is important that the case referred to the mediation must be carried out with due diligence and proper screening in order to ensure that no injustice is done to the victim.¹⁵

CONCLUSION

The major reason juvenile delinquency has been kept separate from the traditional system is to empower and rehabilitate the delinquents with a hope that they don't carry their act of committing the offence in their future. This kind of system will enable the children to maintain their individuality throughout and seek justice in turn; this characteristic feature of Mediation will offer a realistic and very effective juvenile justice technique. When mediation is integrated with this VOMP mechanism, it will help to reduce recidivism amongst criminals even further.

Mediation makes criminals personally responsible to those who have been harmed. It enables for much more direct participation in the judicial process of crime victims and community members and lowers criminals' criminal conduct. Nevertheless, while employing mediation in a juvenile justice matter, one must use caution. There isn't one-size-fits-all solution. There may be flaws, but if mediation is seen as a supplementary tool rather than a substitute, these flaws may be resolved.

REFERENCES

- Prof. N.V. Paranjape, Criminology, Penology with Victimology, page no 665, Central Law Publications, 17th edition, 2017.

¹⁴ “CRL.O.P.(MD)NO.5474 OF 2010.”

¹⁵ “Prof. N.V. Paranjape, Criminology, Penology with Victimology, page no 665, Central Law Publications, 17th edition, 2017.”

- Use Of The Indeterminate Sentence In Crime Prevention And Rehabilitation, 7 duke law Journal 65, 71 (1958).
- Can Alternative Dispute Resolution Fix the Juvenile Justice System?, Nicole Shoener, LegalMatch Legal Writer, <https://legalmatch.typepad.com/criminallaw/2014/11/can-alternative-dispute-resolution-fix-the-juvenile-justice-system.html>, accessed on 10:15 AM, 12th Feb 2020.
- Apoorva, “The Juvenile Justice Bill, 2015: All you need to know”, retrieved from <http://www.prsindia.org/theprsblog/juvenile-justice-bill-2015-all-you-need-know>, accessed on 04:38 PM, February 02, 2020.
- Dr. S.S. Srivastava, page no 319, Central Law Agency, 3rd Edition, 2007.
- Lode Walgrave, Restoration in Youth Justice, 31 youth crime and youth Justice: comparative and cross- national Perspectives 552 (2004).
- Stephanie Turner, Fresh Start for Young Offenders, 3, October, 2011, available at http://policyprojects.ac.nz/stephanieturner/files/2011/10/A-Fresh-Start-forYouth-Offenders_S-Turner.pdf, accessed on 02:54 PM, 24 Feb, 2020.
- Mark S. Umbreit, Restorative Justice Through Victim-Offender Mediation: A Multi-site Assessment, 1 Western Criminology Review 1 (1998).