



INDIAN JOURNAL OF LEGAL AFFAIRS AND RESEARCH

VOLUME 3 ISSUE 1

Peer-reviewed, open-access, refereed journal

IJLAR

+91 70421 48991
editor@ijlar.com
www.ijlar.com

DISCLAIMER

The views and opinions expressed in the articles published in the Indian Journal of Legal Affairs and Research are those of the respective authors and do not necessarily reflect the official policy or position of the IJLAR, its editorial board, or its affiliated institutions. The IJLAR assumes no responsibility for any errors or omissions in the content of the journal. The information provided in this journal is for general informational purposes only and should not be construed as legal advice. Readers are encouraged to seek professional legal counsel for specific legal issues. The IJLAR and its affiliates shall not be liable for any loss or damage arising from the use of the information contained in this journal.

Introduction

Welcome to the Indian Journal of Legal Affairs and Research (IJLAR), a distinguished platform dedicated to the dissemination of comprehensive legal scholarship and academic research. Our mission is to foster an environment where legal professionals, academics, and students can collaborate and contribute to the evolving discourse in the field of law. We strive to publish high-quality, peer-reviewed articles that provide insightful analysis, innovative perspectives, and practical solutions to contemporary legal challenges. The IJAR is committed to advancing legal knowledge and practice by bridging the gap between theory and practice.

Preface

The Indian Journal of Legal Affairs and Research is a testament to our unwavering commitment to excellence in legal scholarship. This volume presents a curated selection of articles that reflect the diverse and dynamic nature of legal studies today. Our contributors, ranging from esteemed legal scholars to emerging academics, bring forward a rich tapestry of insights that address critical legal issues and offer novel contributions to the field. We are grateful to our editorial board, reviewers, and authors for their dedication and hard work, which have made this publication possible. It is our hope that this journal will serve as a valuable resource for researchers, practitioners, and policymakers, and will inspire further inquiry and debate within the legal community.

Description

The Indian Journal of Legal Affairs and Research is an academic journal that publishes peer-reviewed articles on a wide range of legal topics. Each issue is designed to provide a platform for legal scholars, practitioners, and students to share their research findings, theoretical explorations, and practical insights. Our journal covers various branches of law, including but not limited to constitutional law, international law, criminal law, commercial law, human rights, and environmental law. We are dedicated to ensuring that the articles published in our journal adhere to the highest standards of academic rigor and contribute meaningfully to the understanding and development of legal theories and practices.

ROLE OF CHILD WELFARE COMMITTEE IN ENSURING CHILD CENTRIC JUSTICE

AUTHORED BY - MRS.BANVEER KAUR JHINGER

ABSTRACT

This study examines the role of Child Welfare Committees (CWCs) in ensuring child-centric justice in India within the statutory framework of the Juvenile Justice (Care and Protection of Children) Act, 2015 and its allied regulatory instruments. It analyses the CWC's institutional design, jurisdiction, and decision-making responsibilities as the competent authority for children in need of care and protection, focusing on how CWCs translate legal standards into practical protection outcomes. The research evaluates procedural dimensions such as production, inquiry, confidentiality, and child participation, highlighting how these safeguards aim to prevent stigma and secondary victimisation. It further assesses the substantive impact of CWC directions relating to restoration, family-based care, alternative care, and adoption-linked processes, with attention to whether orders lead to measurable rehabilitation and reintegration. The study also examines inter-agency coordination between CWCs, police/SJPU, DCPU, Child Helpline mechanisms, JJ Boards, and Special Courts under the POCSO Act, 2012, emphasising the need for timely, integrated assistance in abuse and exploitation contexts. Finally, it identifies implementation challenges—caseload pressures, uneven infrastructure, capacity gaps, and inconsistent practices—and proposes reforms to strengthen accountability, uniform standards, and service linkages for effective child-centric justice delivery.

Keywords: Child Welfare Committee; Juvenile Justice Act, 2015; Child-Centric Justice; POCSO Act, 2012; Best Interests of the Child

1. INTRODUCTION

The Child Welfare Committee (CWC) serves as the main authority of India which operates its child protection system through the implementation of child-centered justice because the CWC handles all cases which require protective measures and rehabilitation services. The CWC operates as a CWC which Section 27 of the Juvenile Justice (Care and Protection of Children) Act 2015 establishes because it works as a Bench with particular authority to perform its work and it uses child-friendly methods which protect child interests through quick decision-making with logical explanations instead of using punitive methods. The statutory framework receives support from constitutional provisions which establish special protection for children under Article 15(3) and the right to life with dignity under Article 21 and the requirement that Article 39(f) mandates which requires children to grow up in free and dignified environments. CWC interventions should follow a welfare-oriented approach which respects rights because this combination exists as a fundamental justification for their work.¹

The CWC uses its primary duty which requires it to handle all cases involving children who appear before it to create protective measures which extend throughout the entire system of child care. Section 30 describes the functions and responsibilities which the Committee must handle because it includes child reception and inquiry direction and child protection agency coordination and development of suitable care plans as its main tasks. The process which handles CWC production (Section 31) and the inquiry process (Section 36) establish the due-process spine of welfare decision-making. Section 37 gives the CWC authority to issue restoration orders to family members who may include supervised or unsupervised visits and placement in suitable facilities or foster homes and any other essential directives that ensure the child stays secure while undergoing rehabilitation. The CWC functions as an initial decision-making body that determines justice through its ability to protect people while allowing them to participate and keeping their personal information private and helping them return to their previous lives.²

¹ Bajpai, A. The juvenile justice (care and protection of children) act 2015: An analysis. 2(2) INDIAN LAW REVIEW, 191-203 (2018)

² Milner, J., & Kelly, D. The need for justice in child welfare. 99(3) CHILD WELFARE, 1-30 (2021)

The CWC demonstrates its child-centric approach most effectively through its work on rights-sensitive cases which involve abuse and neglect and human trafficking and sexual violence because these cases require protection measures that must be executed without causing further trauma to victims. The JJ Act defines CWC responsibilities for child care and rehabilitation and social reintegration which includes processes that enable legal adoption under Section 38 for eligible children, while the Protection of Children from Sexual Offences Act 2012 establishes child-friendly investigation and trial standards through its requirements for essential investigations and procedures which include evidence collection methods that help decrease victim distress (Sections 24, 26) and Special Courts which must follow child-friendly standards (Section 33). The two laws combined create a framework which establishes the CWC as an institution that provides restorative stabilization through its implementation of statutory protections which guarantee that all decisions about the child proceed according to their best interests from the initial assessment through to their permanent restoration and reintegration.³

1.1. Objectives of the Study

1. To establish the legal foundation and operational framework of the Child Welfare Committee this operates under the Juvenile Justice (Care and Protection of Children) Act from 2015.
2. To examine how the CWC implements its operational functions to make decisions which protect the rights of children who require care and protection.
3. To examine how CWC orders and interventions use the "best interests of the child" standard to develop care plans and restoration and rehabilitation processes.
4. To investigate how CWCs and their partner organizations which include Police/SJPU DCPU and Child Care Institutions and Special Courts under POCSO work together to protect children through their institutional framework.
5. To identify existing implementation problems while providing recommendations for reforms which will help improve child-focused justice results that CWCs achieve in their work.

³ Hampson, K., Nisbet, A., & Case, S. Child first participatory research: The challenges of involving children in youth justice decision-making. 19(2) BRITISH JOURNAL OF COMMUNITY JUSTICE, 45-65 (2024).

1.2 Research Questions

1. What is the legal mandate and institutional design of the CWC under the Juvenile Justice (Care and Protection of Children) Act, 2015?
2. How do CWC procedures ensure child participation, privacy, and protection in inquiries and orders concerning children in need of care and protection?
3. Which specific methods do CWC directions from the JJ Act use to implement the best-interests principle through their established procedures that deliver actual care and restoration and rehabilitation results?
4. How well CWCs work with other statutory bodies through their POCSO system to protect victims from secondary victimization while delivering timely assistance.
5. What structural and administrative barriers affect the performance of CWCs, and what legal and administrative reforms need to be implemented for improving child-centric justice systems?

1.3 Research Methodology

The research study uses doctrinal research methods to investigate legal rules which protect children and support child-centered judicial processes in India. The study analyzes primary legal documents which include the Juvenile Justice (Care and Protection of Children) Act, 2015 and its associated regulations and legal documents and the Protection of Children from Sexual Offences Act, 2012 to determine the CWC's functions and responsibilities. The study uses authoritative secondary materials which include parliamentary materials official guidelines and reports from statutory bodies and scholarly legal literature to assess implementation challenges. The method combines analytical and interpretative elements to examine the design of laws and the duties of institutions and the consistency of legal standards.

1.4 Review of Literature

Ved Kumari (2009)⁴ investigates how India progressed through its juvenile justice system as Kumari evaluated the system's progress from a welfare-based approach to its present rights-based

⁴ Ved Kumari, Juvenile Justice: Securing the Rights of Children During 1998–2008, 2 NUJS L. REV. 557, 557–72 (2009). (Mar. 1, 2026, 3:31 PM), <https://docs.manupatra.in/newslines/articles/Upload/0760102C-037B-43A4-A4B9-4ED1FAC05A0C.pdf>.

framework while discovering the implementation gaps and institutional capacity limitations and protection procedure shortcomings. The article demonstrates how statutory bodies must follow proper procedures to establish accountability which supports rehabilitation efforts needed to make children's rights enforceable throughout their implementation.

Dr. Ved Pal Singh & Rahul Goyat, (2021)⁵ investigates CWCs as the legal authority responsible for making decisions about children who require care and protection by examining their organizational structure and their operational methods and their existing difficulties. The research shows that better training and resource availability will lead to improved child-centric results which require proper coordination together with documentation and timely orders.

V. Rama Narsaiah (2023)⁶ establishes a connection between increasing child abuse cases and how institutions respond to cases under JJ and POCSO legal systems. The article demonstrates how CWCs and Special Courts should work together with CWCs providing immediate care services and placement options while courts use child-friendly methods to handle criminal cases.

Huma Faheem Ansari (2023)⁷ describes how CWC operates as a mandatory authority responsible for creating protective measures and conducting child welfare evaluations and executing rehabilitation programs for at-risk youth. The article presents three main points which include maintaining confidentiality and engaging children in a friendly manner and making decisions through restorative practices while describing implementation challenges that emerge because of district-wide variations in available resources and inter-agency cooperation.

Shivani et al., (2025)⁸ investigates the functioning of the JJ system in Uttar Pradesh by evaluating how well institutions work together with their ability to provide services. The research identifies three practical obstacles which include the existing caseload together with the staff shortage and the deficiencies in monitoring procedures while declaring that child-centric justice needs

⁵ Dr. Ved Pal Singh & Rahul Goyat, Child Welfare Committees in India: A Study, 10(1) INT'L J. PROF'L DEV. 18, 18–22 (2021). (Mar. 1, 2026, 3:31 PM), <https://ijpd.co.in/papersv10n1/06.pdf>.

⁶ V. Rama Narsaiah, Crimes Against Children's and Role of the Child Welfare Committee, Special Courts in India—A Legal Study, 9(5) INT'L J. L. 171, 171–75 (2023). (Mar. 1, 2026, 3:31 PM), <https://www.lawjournals.org/assets/archives/2023/vol9issue5/9174-1697094964660.pdf>.

⁷ Huma Faheem Ansari, Significance of Child Welfare Committee in India, 2(2) J. LEGAL RES. & JURIDICAL SCIS. 177, 177–84 (2023). (Mar. 1, 2026, 3:31 PM), <https://jlrjs.com/wp-content/uploads/2023/02/19.-Huma-Faheem-Ansari.pdf>.

⁸ Shivani (et al.), Juvenile Justice in Uttar Pradesh: Evaluating the Efficacy of the Juvenile Justice System, 11(7) INT'L J. L. (2025). (Mar. 1, 2026, 3:31 PM), <https://www.lawjournals.org/assets/archives/2025/vol11issue7/11145.pdf>.

standardized processes and improved monitoring and rehabilitation connections through district-level systems.

1.5 Research Gap

The Juvenile Justice (Care and Protection of Children) Act 2015 together with the POCSO Act 2012 mission to protect children through their established legal framework which requires research to assess whether Child Welfare Committee (CWC) orders achieve child safety outcomes through safe restoration and stable alternative care and successful rehabilitation. Existing work often remains descriptive because it does not enable district-level assessment of inquiry quality through its assessment of investigation timelines and confidentiality practices and inter-agency coordination. The research lacks comparative analysis which assesses foreign child protection decision-making models to establish applicable standards for accountability and case management.

2. STATUTORY AND INSTITUTIONAL FRAMEWORK OF CHILD WELFARE COMMITTEES IN INDIA

2.1 Legal Basis, Composition, Powers, and Functions of the CWC under the JJ Act

The Child Welfare Committee (CWC) serves as the official legal foundation for the protection of children who require safeguarding according to the Juvenile Justice (Care and Protection of Children) Act 2015 (JJ Act). Section 27 mandates the constitution of one or more CWCs for every district, prescribing composition (Chairperson + four members), minimum expertise requirements, gender representation, secretarial support through the District Child Protection Unit (DCPU), tenure safeguards, and oversight through quarterly review by the District Magistrate; it also clarifies that the CWC functions as a Bench and is vested with powers akin to a Judicial Magistrate of First Class for its proceedings, strengthening its authority to pass enforceable protection orders.⁹

The JJ Act establishes CWC powers and responsibilities through Sections 28-30 to protect children's rights because actual decision-making requires organizational responsibility instead of basic administrative work. Section 29 specifies the powers of the Committee, while Section 30

⁹ Narsaiah, V. R. Crimes against Children's and the Role of the Child Welfare Committee, Special Courts in India: A Legal Study. 5 INT'L JL MGMT. & HUMAN., 6, 1331 (2023)

enumerates its functions and responsibilities—covering reception of children, inquiry facilitation, directing appropriate care, ensuring rehabilitation and restoration, and coordinating with the child protection machinery. The statutory framework establishes a system designed to provide justice for children which enables the competent authority to protect safety and dignity and allow children to participate in their own reintegration process instead of facing blame or punishment.¹⁰

2.2 Interface of CWCs with Police, Childline, DCPU, SJPU, JJ Board, and Courts

The CWC serves as a central body which combines protection services with policing activities and welfare programs. The JJ Act establishes Section 31 as a legal mechanism which enables first responders to access CWC protective services through police and child protection officer pathways. The DCPU provides secretarial services to the Committee according to Section 27 which enables inter-agency case management and protective order implementation through actual service delivery.¹¹

A child-centric system also requires seamless referral pathways from helpline/outreach services to statutory decision-makers. The Child Helpline India which operates under "1098" functions as a crisis contact point and referral mechanism which provides services throughout the country to various districts and intervention units. The helpline must establish protection routing capabilities to police/SJPU and DCPU and CWC for legal action which includes production and inquiry initiation and placement orders even as Mission Vatsalya administrative models develop.¹²

The main way that CWC interacts with courts and specialised justice forums becomes evident when safeguarding problems intersect with criminal proceedings which include sexual offense cases and when legal protections become necessary for making decisions about long-term placement and rehabilitation. The CWC functions as a non-criminal trial court because its operations impact multiple legal aspects which include the child's security and home environment

¹⁰ Kanth, A. K. Children in Need of Care and Protection—Their Rights Deserve the First Call. In *Child Protection in India* ROUTLEDGE 13-38 (2025)

¹¹ Desai, M., Manoharan, A., Mehta, N., & Mehendale, A. Overview and way forward for child-centred social work practice. In *Child-Centred Social Work in India* ROUTLEDGE INDIA, 269-293 (2022)

¹² Nithya, Ms S. Selvi, and PB Shankar Narayan. "Gaps and challenges in implementing Juvenile Justice (Care and Protection of Children) Act 2015: A critical analysis." *SHANLAX INTERNATIONAL JOURNAL OF ARTS, SCIENCE AND HUMANITIES* 5 (2018)

and care coordination and rehabilitation process. The judicial system operates through this integrated framework, which protects children from being transferred between agencies that lack responsibility, while the CWC welfare orders and POCSO/Special Court legal processes proceed, to achieve the child's optimal welfare needs.

2.3 Rules, SOPs, and Administrative Accountability of CWCs

The CWC operating rules receive their main structure from the laws of statutory authority which delegates specific operational tasks through legal instruments that create implementation processes. The Juvenile Justice (Care and Protection of Children) Model Rules, 2016 provide both production procedures and case processing methods which include reporting formats that follow specific rules for documenting cases at the production phase through Form-based documentation which creates set standards for collecting intake data. Standardisation requires the collection of major facts, which determine vulnerability and safety, to be documented before orders are issued, which helps establish child-centered judicial procedures.¹³

The JJ Act establishes administrative accountability through its institutional review and grievance redressal processes which include the District Magistrate's duty to conduct quarterly assessments of CWC operations and his role as grievance resolution authority defined in Section 27. The foundation establishes a child-focused justice system because it acknowledges that delays and nonverbal verdicts and disorganized operations create direct damage to children while committee supervision protects legal rights and service standards through monitoring of official processes. The Model Rules amendments which include official amendments demonstrate a developing regulatory environment which aims to enhance implementation effectiveness and operational transparency.¹⁴

¹³ Rahul, S. K., & Yadav, R. K. Challenges Faced by Children at Child Care Institutions under the Juvenile Justice (Care and Protection of Children) Act, 2015: A Legal Study. 5 INT'L JL MGMT. & HUMAN., 5, 1145 (2022)

¹⁴ Agarwal, D. Juvenile delinquency in India—Latest trends and entailing amendments in Juvenile Justice Act. People: 3(3) INTERNATIONAL JOURNAL OF SOCIAL SCIENCES, 1365-1383 (2018)

3. PROCEDURES BEFORE THE CWC AND CHILD-FRIENDLY ADJUDICATORY STANDARDS

3.1 Receiving a Child in Need of Care and Protection: Intake, Assessment, and Orders

The JJ Act creates a structured pathway from first production to legally sustainable orders. The Committee production process operates under Section 31 which enables CWC to initiate protective jurisdiction through their receipt of production materials and reports instead of requiring court proceedings to begin. The CWC must investigate cases involving children who need protection according to Section 36 while Section 37 allows the Committee to issue various orders for protective care and rehabilitation which include restoration to family and foster care and suitable facility placement. The provisions establish child-centric justice procedures because they transform vulnerable situations into enforceable rights which citizens use to obtain safe environments and protective services.

The system uses intake and assessment procedures to decide whether it will protect the child through immediate safety measures and long-term stability solutions. The Model Rules framework and form-based reporting at production use rules to collect essential information about a person's identity and situation details and their specific vulnerabilities and urgent requirements. The process of child-centric adjudication requires intake procedures to be organized because they help to decrease secondary trauma while maintaining protection planning standards.

3.2 Child-Friendly Processes: Participation, Privacy, Non-Stigmatisation, and Safety Planning

Child-friendly justice requires that institutional processes protect dignity and privacy, particularly where disclosure of identity or sensitive facts can expose children to stigma and retaliation. The JJ Act prohibits the release of child identities in specific situations because Section 74 establishes confidentiality as a mandatory requirement that must be followed. POCSO establishes a child-friendly criminal procedure that governs statement recording methods and evidence collection approaches through its Sections 24 and 26 which detail child-friendly statement recording procedures and its Section 33 which mandates child-friendly procedures for Special Courts.¹⁵

¹⁵ Varma, P., & Singh, D. A. An analytical approach to juvenile justice and rehabilitation measures under the juvenile justice act in India. 4(1) INTERNATIONAL JOURNAL OF CIVIL LAW AND LEGAL RESEARCH, 61-66 (2024)

The CWC adjudicates family disputes through safety planning which serves as its primary adjudicatory output when family safety needs protection. The Section 37 order provides multiple restoration options which include supervised or unsupervised restoration and different types of alternate care solutions. The justice system here measures its success through child outcomes which track their safety and stability after completing the process while they receive services that reduce their risk of violence and neglect and trafficking and homelessness.¹⁶

3.3 Record-Keeping, Timelines, Case Management, and Review Mechanisms

The process of record-keeping together with case management functions as essential due-process protections which enable welfare adjudicators to perform their duties. The inquiry mandate of Section 36 requires decision makers to base their choices on available evidence and written explanations of their decisions while the Model Rules present a framework which helps organizations document their activities and maintain operations through staff changes and cross-district agency partnerships. A child-centric system treats timely review and monitoring as essential because vulnerability contexts are dynamic; placements and restoration plans require reassessment to prevent repeated harm or institutional drift.

The mechanisms of oversight control ensure that case management processes operate according to established rules. The JJ Act requires District Magistrates to conduct quarterly reviews while Section 27 establishes DM-level grievance redressal as an institutional mechanism which helps to resolve delays and operational inconsistencies and protection violations. The child-centric justice system in this context faces a critical challenge from inquiry and order delays because they lead to extended periods of unsafe exposure and multiple displacements and unwarranted institutionalization which conflict with the child's best interests.¹⁷

¹⁶ Majumdar, Promita, and Asok Kumar Sarkar. "Family Centered approach to Child protection services in India: Future scope for non-governmental organizations to prevent child maltreatment." *CHILD PROTECTION AND PRACTICE* 5, 100157 (2025)

¹⁷ Guha, Shoumodipa. "Criminal Accountability of Juveniles in Heinous Crimes: Revisiting the Juvenile Justice Act." *JUS CORPUS LJ* 6, 24 (2025)

4. CWC INTERVENTIONS FOR CARE, PROTECTION, AND REHABILITATION

4.1 Restoration and Family-Based Care: Gatekeeping, Follow-Up, and Aftercare

The process of restoration leads to child-centered results which maintain a child's identity through safe and voluntary restoration process which receives necessary service support. The JJ Act enables restoration-oriented decision-making through Section 37 which permits the CWC to return a child to parents or guardians or family members with or without supervision while imposing welfare protection conditions. The CWC essential gate keeping function requires child-centric justice systems to deny restoration when it exposes children to abuse and exploitation while choosing protective placements which all which enable family strengthening through aftercare support systems when reunification becomes possible.

Follow-up activities serve as essential components for restoration achievement. The CWC system effectiveness depends on the operationalization of supervision systems together with counselling resources and education connections, and livelihood assistance through the child protection network which includes Mission Vatsalya systems. The establishment of SOPs together with scheme guidelines holds significant importance because they create operational pathways which enable organizations to coordinate their work and make referrals and respond to emergencies, which leads to sustainable restoration processes that go beyond mere symbolic representation.¹⁸

4.2 Alternative Care Decisions: Foster Care, Fit Facility, Adoption Linkages, and Institutional Care

Safe family-based restoration solutions do not exist in situations where family restoration fails to meet safety requirements. Child-centric justice needs to establish safe yet supportive methods that provide the least restrictive treatment which protects children. Section 37 establishes a range of orders that enable alternative care placements while Section 38 outlines the legal process which allows adoption declaration of a child as legally free for adoption, which prevents lengthy institutional stays when adoption becomes suitable. The CWC handles essential legal work

¹⁸ Majumdar, Promita, and Asok Kumar Sarkar. "Family Centered approach to Child protection services in India: Future scope for non-governmental organizations to prevent child maltreatment." CHILD PROTECTION AND PRACTICE 5, 100157 (2025)

because adoption and long-term care choices determine how children will develop throughout their lives, thus legal matters together with reasoned orders and prompt proceedings form the basis for achieving justice results.¹⁹

Table 1: Adoption Outcomes and Trends in India (CARA Statistics)

Financial Year	In-country (Domestic) Adoptions (No.)	Inter-country Adoptions (No.)	Total (No.)
2021–22	2,991	414	3,405
2022–23	3,010	431	3,441
2023–24	3,580	449	4,029
2024–25	4,155	360	4,515

Sources: 1) https://cara.wcd.gov.in/resource/adoption_Statistics.html 2)

<https://www.pib.gov.in/PressReleasePage.aspx?PRID=2117433>

CWC performance in Section 38 processes holds importance for adoption outcomes because these outcomes depend on proper identification and timely investigation and legal declaration of children as free for adoption when statutory requirements exist. A recent government communication reports 4,515 total adoptions in FY 2024–25, with 4,155 domestic adoptions and a major identification drive introducing thousands of children into the adoption pool—showing that systems-level coordination, including the CWC’s gatekeeping decisions, directly shapes whether children move from institutional uncertainty to permanent family care.

4.3 Special Categories of Children: Missing/Runaway, Trafficked, Migrant, Street-Connected, and Children with Disabilities

The justice system which focuses on children must handle vulnerable groups without making assumptions about their character or treating them like criminals who include missing children and runaway children and trafficked children and street-connected children and migrant children. The CWC uses Section 37 powers to establish immediate safe placement and long-term rehabilitation strategies while the JJ Act Section 32 mandatory reporting system allows for quick identification of separated children. The CWC works with police and specialized services to protect trafficked

¹⁹ Pradhan, Aditya. "An Overview of Child Rights in India." SSRN 5216201 (2025)

or exploited children while maintaining its primary focus on their welfare and reintegration process instead of making suspicions or assigning blame.²⁰

System capacity also matters: Mission Vatsalya's national portal reporting on Child Care Institutions (CCIs) shows the extent of institutional infrastructure which CWCs must manage when community-based solutions do not exist. The available administrative data does not exist as simple records because it determines placement options and oversight standards and the process of creating "least restrictive" care plans which are essential to child-centric justice.²¹

Table 2: Institutional Care Footprint under Mission Vatsalya (Indicative National Portal Reporting)

Indicator	Reported Figure
Child Care Institutions (CCIs) (portal-reported)	3,799

Sources: 1) <https://missionvatsalya.wcd.gov.in/?showagency=9> 2)
<https://missionvatsalya.wcd.gov.in/>

5. ENSURING CHILD-CENTRIC JUSTICE IN CASES OF ABUSE, NEGLECT, AND EXPLOITATION

5.1 Coordination with POCSO and Criminal Justice Agencies: Referral, Support, and Protection Measures

Child-centric justice in abuse and exploitation cases requires institutional cooperation because CWC protective jurisdiction needs to work together with criminal justice systems while protecting children from becoming "pieces of evidence." POCSO establishes child-friendly procedures for reporting and recording statements (Sections 24 and 26) and duties of Special Courts (Section 33) so that the process reduces distress and intimidation. The CWC needs to establish immediate protection and safe placement and service linkage which must occur during criminal proceedings

²⁰ Dubey, S. N., and M. J. Apte. "Family and Child Welfare Projects: Organisation and Administration." *ECONOMIC AND POLITICAL WEEKLY* 1272-1278 (1972)

²¹ Wanglar, Evergreat. "Assessment of Child Care Institutions in India: Perspectives from Children Who Have Transitioned From Institutions." 31(1) *CHILD & FAMILY SOCIAL WORK* 214-224 (2026)

according to JJ Act inquiry and order-making powers (Sections 36-37) to protect welfare outcomes from being harmed through procedural disruptions.²²

Table 3: Crimes against Children in India (NCRB 2023 Headline Composition Reported in Public Summaries)

Indicator (2023)	Number of Cases	Share of Total (%)
Total crimes against children	177,335	100.0
Kidnapping & abduction of children	79,884	45.0
POCSO Act offences	67,694	38.2
Other offences (residual)	29,757	16.8

Sources: 1) <https://vajiramandravi.com/current-affairs/ncrb-data-on-crime-against-children/> 2) <https://www.thenewsminute.com/news/ncrb-data-records-a-92-rise-in-crimes-against-children-in-2023>

The CWC operational situation exists because these statistics show which CWC activities require immediate protective actions and secure child placements and protection of children's private information and complete system which helps in treating cases. The CWC requires its protective orders and monitoring system to operate with POCSO procedures because these instruments help protect against secondary damage which occurs when children need to repeat their interviews for POCSO procedures.²³

5.2 Victim Assistance and Support Services: Counselling, Compensation Linkages, Medical and Psychological Care

Child rights through justice require protection orders to provide actual support through medical treatment and trauma-specialized counseling and educational support and family rehabilitation services. The JJ Act grants legal power to issue care and protection orders through its Sections 36 to 37 but Mission Vatsalya uses its scheme and SOP instruments to implement its service delivery and helpline-to-agency coordination system which includes emergency response system

²² Maity, S., & Chakraborty, P. R. Implications of the POCSO Act and determinants of child sexual abuse in India: insights at the state level. 10(1) HUMANITIES AND SOCIAL SCIENCES COMMUNICATIONS, 6 (2023)

²³ Deb, Sibnath. "Child safety, welfare and well-being." SPRINGER 10, 978-81 (2015)

integration. The first step requires legal protection which needs services as children need both protected status and support services.²⁴

5.3 Protection from Secondary Victimization: Safe Placement, Confidentiality, and Rights-Based Communication

Secondary victimisation occurs when institutions replicate harm through insensitive questioning, disclosure of identity, unsafe placements, or prolonged uncertainty. The JJ Act's confidentiality protections together with POCSO's child-friendly procedural requirements establish a legal framework which compels agencies to practice privacy-respecting trauma-informed handling. The CWC has two main responsibilities which include issuing orders and establishing implementation practices that protect dignity while decreasing unnecessary disclosures and ensuring safety to achieve child-centric justice which affects both results and process.²⁵

6. IMPLEMENTATION CHALLENGES AND PERFORMANCE OF CWCs

6.1 Structural Constraints: Infrastructure, Training, Caseload, and Resource Gaps

CWCs face multiple structural challenges that create obstacles to achieving child-centric justice because they deal with high caseloads and have insufficient trained personnel and face uneven facility conditions and need different levels of specialized services. The JJ Act requires institutional support because it establishes DCPU secretarial assistance as operational support under Section 27 while district-level monitoring needs to take place. The entire child-centric view sees these deficits as costs which children must pay through institutionalization and repeated relocations and service interruptions.

6.2 Quality of Decision-Making: Consistency, Reasoned Orders, Best Interest Assessments, and Monitoring

CWC performance assessment depends on the evaluation of their monitoring work and order production which needs to demonstrate inquiry value through Section 36 and show appropriate

²⁴ Bajpai, A. The juvenile justice (care and protection of children) act 2015: An analysis. 2(2) INDIAN LAW REVIEW, 191-203 (2018)

²⁵ Nandan, Priyank. "POCSO Act and Juvenile Justice: an analysis of existing laws and practices in India." 6 INDIAN JL & LEGAL RSCH. 4, 1 (2022)

balance through Section 37 orders and track lawful restoration and adoption processes. Districts show practice differences which create different levels of justice for children who have similar situations because they handle restoration safety assessments and adoption determinations via Section 38 at different speeds. Child-centric justice requires capacity building which enables organizations to create reasoned orders and perform risk assessments and connect to services and track results through measurable assessments.²⁶

6.3 Institutional Oversight: State Commission/SCPCR Role, Social Audit, and Grievance Redressal

The legal system uses oversight frameworks to ensure child protection cases receive proper judicial treatment and consistent process execution. The JJ Act establishes specific procedures through which the District Magistrate (Section 27) must handle review and grievance procedures at the district level. Statutory child rights bodies and administrative audits to determine compliance support the monitoring of broader child rights protection activities which implementation documents for district operations describe as standard practice. The child-centric approach to oversight assesses results through the three dimensions of case closure whether it happens on time and whether all people maintain their dignity and safe and successful restoration to normal life.²⁷

7. CASE LAWS

Sampurna Behura v. Union of India & Ors²⁸ Supreme Court issued monitoring-based instructions to enhance the operational effectiveness of all statutory bodies that function under the juvenile justice system, while it identified all existing deficiencies in juvenile justice institution operations. The judgment establishes that all protective functions established under the JJ Act must function throughout the system to provide children with essential support services including protection and rehabilitation.

²⁶ Rawat, Anjali, A. Samson Arun Raj, Janet Olivia Richmond, Anand Rajavat, Antonio González-Torres, and Purvee Bhardwaj. "Global Perspectives: Comparative Child Protection Laws Across Countries." In *Child Protection Laws and Crime in the Digital Era*, IGI GLOBAL SCIENTIFIC PUBLISHING, 133-154 (2026)

²⁷ Varma, P., & Singh, D. A. An analytical approach to juvenile justice and rehabilitation measures under the juvenile justice act in India. 4(1) *INTERNATIONAL JOURNAL OF CIVIL LAW AND LEGAL RESEARCH*, 61-66 (2024)

²⁸ *Sampurna Behura v. Union of India & Ors.*, (2018) 4 SCC 433

Re: Exploitation of Children in Orphanages in the State of Tamil Nadu v. Union of India &

Ors²⁹ The Court mandated all parties involved in the case to follow the child protection system because it included both identification procedures for at-risk children and rules for operating institutions and joining forces with other organizations. The decision establishes that child welfare systems exist to protect children while organizations require monitoring to stop any potential mistreatment or behavior which resembles human trafficking.

Bachpan Bachao Andolan v. Union of India & Ors³⁰ The Court treated missing-child complaints as needing immediate police investigation because any delay could pose a threat to life and personal freedom. This process enables child centric justice through first response accounts both for initial response and investigation processes while it also allows for protection through juvenile justice system production and care planning processes.

Nipun Saxena v. Union of India & Ors³¹ Your training concludes with knowledge from data until the month of October in the year 2023. The Supreme Court created stronger privacy rights for survivors of sexual offenses which included children and established new rules to protect their identities according to existing laws that govern confidentiality in child protection cases. The decision supports child-centric justice by preventing stigma and secondary victimisation, particularly relevant when POCSO processes and welfare orders run concurrently.

Shabnam Hashmi v. Union of India & Ors³² The Court confirmed that all religious groups may adopt children through the juvenile justice system after completing the required legal procedures which protect the child's entitlement to a permanent family unit through authorized means. The decision supports child-centric outcomes by validating a secular, welfare-first adoption route tied to the JJ law architecture.

Laxmi Kant Pandey v. Union of India³³ The landmark ruling established a framework for international adoptions through which it created protective measures and operational rules which helped to stop human trafficking and exploitative practices. Adoption must proceed through

²⁹ Re: Exploitation of Children in Orphanages in the State of Tamil Nadu v. Union of India & Ors., (2017) 4 SCR 625 (W.P. (CrI.) No. 102 of 2007)

³⁰ Bachpan Bachao Andolan v. Union of India & Ors., (2014) 16 SCC 612

³¹ Nipun Saxena v. Union of India & Ors., (2019) 2 SCC 703

³² Shabnam Hashmi v. Union of India & Ors., (2014) 4 SCC 1

³³ Laxmi Kant Pandey v. Union of India, (1984) 2 SCC 244; AIR 1984 SC 469

welfare-based programs which maintain strict oversight because all processes must operate in accordance with institutional safeguards.

Sheela Barse v. Union of India³⁴ The Court prohibited the practice of placing children in adult detention centers while ordering the establishment of proper custodial and welfare systems which meet the needs of children. The ruling remains important for child-centric justice because it shows that children need special protection during all judicial processes and institutional treatment which needs to change from punishment to caring methods that respect their rights.

Gaurav Jain v. Union of India & Ors³⁵ The Court issued rehabilitation-oriented directions for children of sex workers, which protect their dignity and provide them with safeguarding measures and pathways to social inclusion. The State must create programs which help children and institutional facilities which stop inter-generational exploitation while protecting their welfare rights according to protective governance rules which prioritize their safety.

8. COMPARATIVE ANALYSIS—CHILD PROTECTION DECISION-MAKING IN INDIA, THE UNITED KINGDOM, AND SOUTH AFRICA

8.1 Institutional Design and Legal Mandate: India's CWC, UK Local Authority Child Protection (Children Act framework) and South Africa's Child Protection System (Children's Act framework)

India's CWC model serves as a dedicated statutory body which operates with judicial powers to decide protective measures for children in need of care and protection under the JJ Act (notably Sections 27, 36, 37 and 38). The child protection system in England delegates its main responsibility for safeguarding children to local authorities through the Children Act 1989, which requires local authorities to safeguard "children in need" by establishing protective services according to Section 17 and Section 47, which requires inquiries whenever there are reasonable grounds for believing that severe harm will occur. South Africa's Children's Act 38 of 2005 requires a rights-and-welfare framework which mandates all proceedings and decisions to follow

³⁴ Sheela Barse v. Union of India, (1986) 3 SCC 596

³⁵ Gaurav Jain v. Union of India & Ors., (1997) 8 SCC 114; AIR 1997 SC 3021

the best interests of the child standard (Section 7), while child protection operations proceed through social development and children's court procedures.³⁶

8.2 Child Participation, Best Interests, and Procedural Safeguards: Hearing the Child, Confidentiality, Representation, and Child-Friendly Processes

The child-centric model functions through two operational standards which establish regulations for all jurisdictions. The child protection safeguards in India receive additional protection through confidential information security (which includes JJ Act Section 74) and POCSO regulations (Sections 24, 26, 33) which protect children's interests during legal proceedings. Section 47 inquiries in England follow welfare procedures because their purpose is to determine necessary actions for protecting and advancing welfare while child protection inquiries require multiple agencies to collaborate during the process. The Children's Act Section 7 of South Africa establishes a standard for determining best interests through its comprehensive framework which identifies key elements for assessing best interests during welfare decision-making.³⁷

8.3 Case Management and Accountability: Inter-Agency Coordination, Review Timelines, Placement Oversight, and Remedies for Non-Compliance

The structures which establish accountability in different forms share a common purpose which prevents children from disappearing into the system. The Indian legal system depends on district administration and procedural rules which include Section 27 review and grievance redressal and Model Rules and Standard Operating Procedures under Mission Vatsalya for statutory oversight. The English legal system establishes accountability through statutory inquiry obligations which require agencies to work together during Section 47 investigations. South Africa's system connects child protection measures to statutory requirements that define children's best interests and judicial systems that manage protective custody and social work operations. India needs to improve its assessment processes through systematic evaluation methods which establish base assessment

³⁶ Jamieson, L. Children's rights to appropriate alternative care when removed from the family environment: A review of South Africa's child and youth care centres. 13(2) SOUTH AFRICA'S PROGRESS IN REALISING CHILDREN'S RIGHTS: A LAW REVIEW, 213-249 (2014)

³⁷ Ferreira, Sandra. "The Best Interests of the Child: From Complete Indeterminacy to Guidance by the Children's Act." 73 THRHR 201 (2010)

criteria for multiple assessment types and develop solutions to eliminate assessment delays which enable consistent child-centered justice delivery throughout all districts.³⁸

9. CONCLUSION

The CWC functions as the statutory competent authority which oversees children in need of care and protection by establishing district offices that operate as judicial benches which possess designated powers to issue binding child protection orders. The JJ Act 2015 establishes welfare adjudication as the primary judicial framework through which protection decisions require both procedural supervision and administrative assessment at district level institutions.

CWC procedures result in a child-friendly space by establishing methods for producing evidence and conducting investigations and establishing orders which prioritize security while minimizing stigmatization. The inquiry framework establishes privacy protections through confidentiality requirements which prevent identity disclosure while the inquiry framework establishes fact-finding requirements that rely on the child's actual circumstances. Child-centric justice exists in two aspects which include final results and the entire journey which starts with how authorities accept the child and continue to protect him by tracing his complete life history.

The CWC uses its inquiry-and-order structure to activate the best-interests principle because it starts when a child arrives at the CWC and the Committee conducts an inquiry which leads to multiple possible outcomes including family restoration with protective measures or alternate care solutions or rehabilitation directives. The framework achieves its fundamental strength through its capacity to deliver customized solutions which match various vulnerability situations, which establish "justice" through measuring a child's security and their ability to access ongoing care and achieve successful reintegration. The CWC protective mandate needs to work together with POCSO child-friendly criminal process to protect victims from secondary victimisation when there involves abuse or sexual exploitation. POCSO requires child-friendly statement recording procedures and Special Court requirements, which work together with CWC safety planning and

³⁸ Bunting, L., McCartan, C., McGhee, J., Bywaters, P., Daniel, B., Featherstone, B., & Slater, T. Trends in child protection across the UK: A comparative analysis. 48(5) BRITISH JOURNAL OF SOCIAL WORK, 1154-1175 (2018)

placement decisions to create two separate pathways: Special Court criminal accountability and CWC immediate protection and care. The process of effective coordination establishes essential elements which lead to prompt help and protect confidential information while preventing victims from experiencing multiple distressing recounts of their trauma.

Although statutory frameworks provide strong legal foundations, child-friendly justice systems face challenges because of inadequate resources, excessive case burdens, insufficiently trained personnel, poor record-keeping and inconsistent collaboration between agencies. The JJ Act establishes a district-level review mechanism to solve performance deficiencies, but the system requires standardised SOP implementation and improved case management and dependable service connections with child protection systems to achieve lasting enhancement. CWCs serve as essential components for child-centered justice systems, but their actual effectiveness depends on how well they get put into practice.

10. RECOMMENDATIONS

1. Minimum procedural standards should be uniformly enforced for production, inquiry, and orders—using standard formats, reasoned directions, and time-bound case management—so that child outcomes do not vary by district.
2. The CWC members and support staff require permanent capacity-building programs which teach them about trauma-informed interviewing and disability inclusion and restoration risk assessment and child-friendly communication and refresher modules which follow the JJ Act and Model Rules.
3. Inter-agency coordination should establish its effectiveness through written referral protocols which police/SJPU, CWCs, DCPUs, Child Helpline, CCIs, and POCSO Special Courts use to deliver single-window support while maintaining confidentiality and reducing the need for witnesses to repeat their statements.
4. District oversight should monitor multiple indicators which include pendency and repeat placements and restoration sustainability and service linkages while establishing grievance redressal systems which allow children to access support through designated assistants and helpline services.

BIBLIOGRAPHY

Statutes

1. The Juvenile Justice (Care and Protection of Children) Act, 2015
2. The Juvenile Justice (Care and Protection of Children) Amendment Act, 2021
3. The Juvenile Justice (Care and Protection of Children) Model Rules, 2016
4. The Protection of Children from Sexual Offences Act, 2012,
5. The Commissions for Protection of Child Rights Act, 2005
6. Mission Vatsalya Guidelines (Ministry of Women & Child Development, Govt. of India) (2021–22 onwards).

Books/ Journal

1. Bajpai, A. The juvenile justice (care and protection of children) act 2015: An analysis. 2(2) INDIAN LAW REVIEW, 191-203 (2018)
2. Milner, J., & Kelly, D. The need for justice in child welfare. 99(3) CHILD WELFARE, 1-30 (2021)
3. Hampson, K., Nisbet, A., & Case, S. Child first participatory research: The challenges of involving children in youth justice decision-making. 19(2) BRITISH JOURNAL OF COMMUNITY JUSTICE, 45-65 (2024).
4. Ved Kumari, Juvenile Justice: Securing the Rights of Children During 1998–2008, 2 NUJS L. REV. 557, 557–72 (2009). (Mar. 1, 2026, 3:31 PM), <https://docs.manupatra.in/newsline/articles/Upload/0760102C-037B-43A4-A4B9-4ED1FAC05A0C.pdf>.
5. Dr. Ved Pal Singh & Rahul Goyat, Child Welfare Committees in India: A Study, 10(1) INT'L J. PROF'L DEV. 18, 18–22 (2021). (Mar. 1, 2026, 3:31 PM), <https://ijpd.co.in/papersv10n1/06.pdf>.
6. V. Rama Narsaiah, Crimes Against Children's and Role of the Child Welfare Committee, Special Courts in India—A Legal Study, 9(5) INT'L J. L. 171, 171–75 (2023). (Mar. 1, 2026, 3:31 PM), <https://www.lawjournals.org/assets/archives/2023/vol9issue5/9174-1697094964660.pdf>.

7. Huma Faheem Ansari, Significance of Child Welfare Committee in India, 2(2) J. LEGAL RES. & JURIDICAL SCIS. 177, 177–84 (2023). (Mar. 1, 2026, 3:31 PM), <https://jlrjs.com/wp-content/uploads/2023/02/19.-Huma-Faheem-Ansari.pdf>.
8. Shivani (et al.), Juvenile Justice in Uttar Pradesh: Evaluating the Efficacy of the Juvenile Justice System, 11(7) INT'L J. L. (2025). (Mar. 1, 2026, 3:31 PM), <https://www.lawjournals.org/assets/archives/2025/vol11issue7/11145.pdf>.
9. Narsaiah, V. R. Crimes against Children's and the Role of the Child Welfare Committee, Special Courts in India: A Legal Study. 5 INT'L JL MGMT. & HUMAN., 6, 1331 (2023)
10. Kanth, A. K. Children in Need of Care and Protection—Their Rights Deserve the First Call. In Child Protection in India ROUTLEDGE 13-38 (2025)
11. Desai, M., Manoharan, A., Mehta, N., & Mehendale, A. Overview and way forward for child-centred social work practice. In Child-Centred Social Work in India ROUTLEDGE INDIA, 269-293 (2022)
12. Nithya, Ms S. Selvi, and PB Shankar Narayan. "Gaps and challenges in implementing Juvenile Justice (Care and Protection of Children) Act 2015: A critical analysis." SHANLAX INTERNATIONAL JOURNAL OF ARTS, SCIENCE AND HUMANITIES 5 (2018)
13. Rahul, S. K., & Yadav, R. K. Challenges Faced by Children at Child Care Institutions under the Juvenile Justice (Care and Protection of Children) Act, 2015: A Legal Study. 5 INT'L JL MGMT. & HUMAN., 5, 1145 (2022)
14. Agarwal, D. Juvenile delinquency in India—Latest trends and entailing amendments in Juvenile Justice Act. People: 3(3) INTERNATIONAL JOURNAL OF SOCIAL SCIENCES, 1365-1383 (2018)
15. Varma, P., & Singh, D. A. An analytical approach to juvenile justice and rehabilitation measures under the juvenile justice act in India. 4(1) INTERNATIONAL JOURNAL OF CIVIL LAW AND LEGAL RESEARCH, 61-66 (2024)
16. Majumdar, Promita, and Asok Kumar Sarkar. "Family Centered approach to Child protection services in India: Future scope for non-governmental organizations to prevent child maltreatment." CHILD PROTECTION AND PRACTICE 5, 100157 (2025)

17. Guha, Shoumodipa. "Criminal Accountability of Juveniles in Heinous Crimes: Revisiting the Juvenile Justice Act." *JUS CORPUS LJ* 6, 24 (2025)
18. Majumdar, Promita, and Asok Kumar Sarkar. "Family Centered approach to Child protection services in India: Future scope for non-governmental organizations to prevent child maltreatment." *CHILD PROTECTION AND PRACTICE* 5, 100157 (2025)
19. Pradhan, Aditya. "An Overview of Child Rights in India." SSRN 5216201 (2025)
20. Dubey, S. N., and M. J. Apte. "Family and Child Welfare Projects: Organisation and Administration." *ECONOMIC AND POLITICAL WEEKLY* 1272-1278 (1972)
21. Wanglar, Evergreat. "Assessment of Child Care Institutions in India: Perspectives from Children Who Have Transitioned From Institutions." 31(1) *CHILD & FAMILY SOCIAL WORK* 214-224 (2026)
22. Maity, S., & Chakraborty, P. R. Implications of the POCSO Act and determinants of child sexual abuse in India: insights at the state level. 10(1) *HUMANITIES AND SOCIAL SCIENCES COMMUNICATIONS*, 6 (2023)
23. Deb, Sibnath. "Child safety, welfare and well-being." *SPRINGER* 10, 978-81 (2015)
24. Bajpai, A. The juvenile justice (care and protection of children) act 2015: An analysis. 2(2) *INDIAN LAW REVIEW*, 191-203 (2018)
25. Nandan, Priyank. "POCSO Act and Juvenile Justice: an analysis of existing laws and practices in India." 6 *INDIAN JL & LEGAL RSCH.* 4, 1 (2022)
26. Rawat, Anjali, A. Samson Arun Raj, Janet Olivia Richmond, Anand Rajavat, Antonio González-Torres, and Purvee Bhardwaj. "Global Perspectives: Comparative Child Protection Laws Across Countries." In *Child Protection Laws and Crime in the Digital Era*, IGI GLOBAL SCIENTIFIC PUBLISHING, 133-154 (2026)
27. Varma, P., & Singh, D. A. An analytical approach to juvenile justice and rehabilitation measures under the juvenile justice act in India. 4(1) *INTERNATIONAL JOURNAL OF CIVIL LAW AND LEGAL RESEARCH*, 61-66 (2024)
28. Jamieson, L. Children's rights to appropriate alternative care when removed from the family environment: A review of South Africa's child and youth care centres. 13(2) *SOUTH AFRICA'S PROGRESS IN REALISING CHILDREN'S RIGHTS: A LAW REVIEW*, 213-249 (2014)

29. Ferreira, Sandra. "The Best Interests of the Child: From Complete Indeterminacy to Guidance by the Children's Act." 73 THRHR 201 (2010)
30. Bunting, L., McCartan, C., McGhee, J., Bywaters, P., Daniel, B., Featherstone, B., & Slater, T. Trends in child protection across the UK: A comparative analysis. 48(5) BRITISH JOURNAL OF SOCIAL WORK, 1154-1175 (2018)

Case laws

1. Sampurna Behura v. Union of India & Ors., (2018) 4 SCC 433
2. Re: Exploitation of Children in Orphanages in the State of Tamil Nadu v. Union of India & Ors., (2017) 4 SCR 625 (W.P. (Crl.) No. 102 of 2007)
3. Bachpan Bachao Andolan v. Union of India & Ors., (2014) 16 SCC 612
4. Nipun Saxena v. Union of India & Ors., (2019) 2 SCC 703
5. Shabnam Hashmi v. Union of India & Ors., (2014) 4 SCC 1
6. Laxmi Kant Pandey v. Union of India, (1984) 2 SCC 244; AIR 1984 SC 469
7. Sheela Barse v. Union of India, (1986) 3 SCC 596
8. Gaurav Jain v. Union of India & Ors., (1997) 8 SCC 114; AIR 1997 SC 3021

IJLAR