



Swami Vivekananda Advanced Journal for Research and Studies

Online Copy of Document Available on: www.svajrs.com

ISSN:2584-105X

Pg. 331-337



Constitutional Safeguards under Article 23 & 24: Scope and Judicial Interpretation

Rashmi Srivastava
LLM, UGC-NET
rashmiadvlko@gmail.com

Accepted: 21/12/2024

Published: 27/12/2024

DOI: <http://doi.org/10.5281/zenodo.17265541>

Abstract

Articles 23 and 24 of the Constitution of India constitute the core of the “Right against Exploitation,” prohibiting trafficking in human beings, begar and other forms of forced labour, and the employment of children below fourteen years in hazardous occupations. Although tersely worded, these provisions have generated a rich sometimes path breaking jurisprudence. Through public interest litigation and expansive interpretive techniques, the Supreme Court transformed Article 23 from a narrow ban on slavery-like practices into a broader guarantee against unfree labour, including labour paid below the statutory minimum. Article 24, initially framed around factory and mine work, has been read against an evolving legislative landscape especially the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 as amended in 2016, the Right of Children to Free and Compulsory Education Act, 2009, and allied policy instruments. This paper traces the text, structure, and historical foundations of Articles 23 and 24; synthesises leading cases such as People’s Union for Democratic Rights v. Union of India (the “Asiad” case), Sanjit Roy v. State of Rajasthan, Bandhua Mukti Morcha v. Union of India, Neeraja Chaudhary v. State of M.P., Labourers Working on Salal Hydro Project v. State of J&K, and M.C. Mehta v. State of Tamil Nadu; and examines contemporary statutory changes, including the Bharatiya Nyaya Sanhita, 2023 (BNS) provisions on trafficking and the Code on Wages, 2019. It argues that the Court’s epistolary and remedial innovations cemented horizontality for Articles 23 -24, created enforcement linkages to Directive Principles (Articles 39(e) -(f)), and generated structural reliefs for identification, release, and rehabilitation of bonded labourers and child workers. At the same time, tensions persist most visibly around the line between “compulsory service for public purposes” and prohibited forced labour; the “hazardous” versus “non hazardous” distinction for child work; and the contested 2016 “family enterprise” exception. The paper concludes that the scope and judicial interpretation of Articles 23 and 24 exemplify transformative constitutionalism in India, while highlighting areas where legislative clarity, administrative capacity, and data driven oversight remain essential.

Keywords: Article 23; Article 24; Right against Exploitation; forced labour; bonded labour; trafficking; child labour; minimum wage; horizontality; PIL; Bharatiya Nyaya Sanhita 2023; Code on Wages 2019; RTE Act 2009.

1. Introduction

The Indian Constitution embeds an uncompromising rejection of exploitative labour regimes. Part III's "Right against Exploitation" (Articles 23 -24) outlaws traffic in human beings, *begar*, and other similar forms of forced labour, and bans the employment of children below fourteen in factories, mines, and other hazardous work¹ Although these provisions are brief, their judicial interpretation has been capacious. From the early 1980s onward, the Supreme Court of India expanded the semantic arc of "forced labour" to include service exacted for less than the statutory minimum wage; recognised the State's obligations to identify, release, and rehabilitate bonded labourers; and developed structural remedies to operationalise these constitutional commands² These developments are entangled with legislative and policy changes from the Bonded Labour System (Abolition) Act, 1976, to the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 (as amended in 2016), the Right to Education Act, 2009, the Code on Wages, 2019, and the shift from IPC §370 to the BNS 2023 §§143 -144 framework on trafficking. Together they form an evolving compliance ecosystem for Articles 23 -24.³

2. Text, Structure, and Horizontality

2.1 The constitutional text

Article 23(1) prohibits "traffic in human beings and *begar* and other similar forms of forced labour," declaring violations to be punishable; Article 23(2) preserves State power to impose "compulsory service for public purposes" so long as it is non-discriminatory. Article 24 forbids the employment of children below fourteen years in factories, mines, or other hazardous employment Although couched as negative liberties, both provisions are widely understood to impose affirmative duties on the State to prevent and remedy exploitation.

2.2 Horizontality and private wrongs

Unlike many fundamental rights that are primarily vertical, Articles 23 and 24 have explicit horizontal reach. Early jurisprudence, notably *PUDR* (1982), treated Article 23 as binding against private actors, given its textual ban on "traffic" and "forced labour" and the nature of the social practices targeted Scholarship and later decisions locate Articles 23 -24 among the small set of rights "plainly and indubitably enforceable against everyone," a necessity in a society where exploitation is often mediated by private power contractors, traffickers, and employers The Court has

sometimes mixed direct and indirect horizontality for Article 24, tethering it to statutory regimes and Article 21A's guarantee of free and compulsory education

2.3 Directive Principles and structural linkages

Articles 39(e) -(f) direct the State to ensure that the "tender age of children are not abused" and that citizens are not forced by economic necessity into avocations unsuited to their age or strength, while protecting childhood and youth from exploitation and moral or material abandonment. Although non-justiciable, these principles have supplied normative ballast for interpreting Articles 23 -24 and designing remedies Their influence is visible in orders mandating inspections, schooling, rehabilitation funds, and welfare schemes aligned with anti-exploitation guarantees.

3. Historical Foundations and Constituent Assembly Debates

Colonial labour formations indenture, *begar*, *veth*, and bonded servitude cast a long shadow over the framing of Articles 23 -24. In the Constituent Assembly, "Right against Exploitation" provisions crystallised as categorical bans. The Debates reflect concern with *begar* and trafficking and an acceptance that the State must be able to impose non-discriminatory compulsory service for public purposes (e.g., civil defence, public works) On Article 24, the Assembly debated the age threshold and the scope of "hazardous employment"; proposals to extend the age beyond fourteen or to add further categorical bans for women workers did not carry, but the adopted text unambiguously prohibited child employment in dangerous settings

4. The Legislative Architecture

4.1 Bonded Labour System (Abolition) Act, 1976

The 1976 Act abolished the bonded labour system, extinguished bonded debts, voided bonded labour agreements, and created enforcement mechanisms rescue, release, and rehabilitation anchored in district-level vigilance committees. This statute is the primary vehicle for operationalising Article 23 against debt-based unfree labour.⁴

4.2 The Immoral Traffic (Prevention) Act, 1956 (ITPA)

While Article 23 proscribes trafficking, criminalisation and procedure lie in ITPA and, post-2013, in penal provisions on trafficking of

¹ Government of India. *The Constitution of India (English)*, 2024 (Part III), Arts. 23 -24. Legislative Department.

² *People's Union for Democratic Rights v. Union of India*, (1982) 3 SCC 235 (Asiad Workers case). Indian Kanoon.

³ *M.C. Mehta v. State of Tamil Nadu*, (1996) 6 SCC 756. CRIN Legal summary.

⁴ Government of India. *Bonded Labour System (Abolition) Act, 1976*, official text. India Code PDF.

persons. ITPA targets brothels, living off the earnings of prostitution, procurement, and detention, alongside special court processes

4.3 Criminal Law (Amendment) Act, 2013 and the new penal framework

Following the 2012 Justice Verma Committee reforms, IPC §370 was substituted by §§370 and 370A, offering a modern trafficking definition aligned with the UN Trafficking Protocol covering recruitment, transport, harbouring, transfer, or receipt by coercive or deceptive means, for purposes of exploitation (sexual exploitation, slavery, servitude, organ removal). Section 370A punishes exploitation of a trafficked person. With the enactment of the Bharatiya Nyaya Sanhita, 2023, trafficking has been re-codified (e.g., BNS §143) with a companion provision on exploiting trafficked persons (BNS §144); mapping tables confirm continuity with IPC §370/370A

4.4 Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 (as amended 2016)

The 2016 amendment prohibits all employment of children (<14) and restricts adolescents (14 -18) from hazardous occupations and processes. It also controversially permits children to “help” in family enterprises after school hours and during vacations an exception defended as socio-economic realism but critiqued as a backdoor for informal child work Enforcement has been supported by the PENCIL portal (2017), designed to coordinate rescues, rehabilitation, and prosecutions

4.5 The Right of Children to Free and Compulsory Education Act, 2009

Article 21A’s enabling statute guarantees free and compulsory education for 6 -14-year-olds, reshaping Article 24’s context by making schooling not work the default for children. Age-appropriate admission and bridge schooling provisions seek to reintegrate working or out-of-school children

4.6 The Code on Wages, 2019

Consolidating wage laws, the Code on Wages introduces the concept of a national “floor wage” and extends minimum wage coverage across employments. Because *PUDR* read forced labour to include labour for less than the minimum wage, the Code’s universalist design strengthens the constitutional baseline under Article 23

4.7 International Labour Organization (ILO) commitments

India’s ratification of the ILO Minimum Age Convention (No. 138) and Worst Forms of Child Labour Convention (No. 182) in June 2017, along with earlier ratification of the Forced Labour Convention (No. 29), situates Articles 23 -24 within international labour standards and informs judicial interpretation and policy design.⁵

5. Judicial Interpretation of Article 23

5.1 Begar, minimum wages, and the Asiad workers

In *People’s Union for Democratic Rights v. Union of India* (1982), the Supreme Court held that paying less than the statutory minimum wage amounts to “forced labour” within Article 23; the logic is straightforward: no one “willingly” supplies labour for less than the minimum statutory threshold, and coercion can be economic as well as physical. This reading decisively moved Article 23 beyond slavery/bondage to routine wage exploitation in public and private projects.

5.2 Famine relief and just compensation

In *Sanjit Roy v. State of Rajasthan* (1983), the Court applied *PUDR* to famine relief work, holding that the State cannot evade Article 23 by labelling labour as “relief”: payment below minimum wages even in such schemes constitutes forced labour and is unconstitutional. The case thus insulated emergency or welfare schemes from becoming vehicles of constitutional evasion.⁶

5.3 Bonded labour: from identification to rehabilitation

Bandhua Mukti Morcha v. Union of India (1984) is foundational. Treating a letter-petition as a writ, the Court issued an extensive set of directions for the identification, release, and rehabilitation of bonded labourers, and tied executive non-compliance to constitutional duties. The judgment entrenched PIL techniques, on-site inspections, and continuous monitoring to give factual bite to Article 23 In *Neeraja Chaudhary v. State of M.P.* (1984), the Court stressed that the constitutional and statutory promise would be hollow unless released bonded labourers were meaningfully rehabilitated rehabilitation is not charity but a legal obligation.⁷

5.4 Migrant and project workforces

Labourers Working on Salal Hydro Project v. State of J&K (1984) extended the supervisory role of the Court to mega-projects deploying migrant labour, insisting on stricter inspection, basic amenities, and non-employment of children in construction (deemed

⁵ ILO NORMLEX. “Ratifications for India (incl. C029 Forced Labour).”

⁶ *Sanjit Roy v. State of Rajasthan*, (1983) 1 SCC 525. CaseMine.

⁷ *Neeraja Chaudhary v. State of Madhya Pradesh*, (1984) 3 SCC 243. BBA PDF / CaseMine.

hazardous), thereby marrying Articles 23 and 24 with labour-law enforcement on the ground

5.5 Prison labour and Article 23

Later, the Court confronted whether compelling prisoners sentenced to rigorous imprisonment to perform hard labour without wages violated Article 23. In *State of Gujarat v. Hon'ble High Court of Gujarat* (1998), the Supreme Court rejected an automatic entitlement to Minimum Wages Act rates for prisoners but required “equitable/fair wages” and permitted deductions for maintenance in some circumstances. The case recognised that penal labour does not per se violate Article 23 if embedded in a statutory framework with fair remuneration and reformatory aims; yet it reaffirmed that exploitation even in prisons attracts constitutional scrutiny

5.6 Compulsory service for public purposes

Article 23(2)'s carve-out has been litigated in the context of compulsory bonds for doctors. In *Association of Medical Super Speciality Aspirants & Residents v. Union of India* (2019), the Supreme Court upheld the validity of State-imposed compulsory service bonds for postgraduate/super-speciality medical graduates as a matter of policy, underscoring public purpose and non-discrimination. Although the judgment primarily engaged Articles 14 and 19, it delineates the constitutional permission for compulsory service, so long as the policy is reasonable and non-arbitrary. The decision signals that Article 23 is not an obstacle to carefully structured public-purpose service obligations.

6. Judicial Interpretation of Article 24

6.1 The Sivakasi directions

In *M.C. Mehta v. State of Tamil Nadu* (1996), triggered by accidents in Sivakasi's match and fireworks units, the Supreme Court prohibited child labour in hazardous industries and crafted a national remedial scheme: compensation payable by the employer into a Child Labour Rehabilitation-cum-Welfare Fund; and an obligation on the State to provide education and welfare measures. The judgment operationalised Article 24 through concrete, fund-based, district-administered reliefs, and tied it to schooling obligations

6.2 Construction as hazardous: the Salal Hydro Project line

Salal underscored that construction is hazardous for children and demanded heightened inspection and schooling near worksites. Such classification matters because Article 24 is textually limited to hazardous employments; judicial recognition helps shift sectors from “informal” to “prohibited” for children below fourteen

6.3 Missing children, trafficking, and structural directions

In *Bachpan Bachao Andolan v. Union of India* (2011, 2013), the Court issued far-reaching directions on children in circuses and on missing children: every missing child complaint must be registered as an FIR with a rebuttable presumption of trafficking/abduction; and governments were tasked with standard operating procedures, tracking, and rehabilitation measures. These orders tie Article 24 to criminal process guarantees and to anti-trafficking enforcement

6.4 Horizontality and method

Scholarly analyses of Article 24 emphasise that, unlike many fundamental rights, its wording and subject matter invite direct horizontality prohibiting private employers (not only the State) from engaging children in hazardous work. The Court has alternated between direct enforcement (banning hazardous child labour) and indirect enforcement (through statutes and Article 21A obligations)

7. Scope: Doctrinal Contours and Grey Zones

7.1 “Other similar forms of forced labour”

Article 23's open-textured phrase has permitted the Court to include debt bondage, coerced labour by intermediaries, and economic compulsion below the legal wage floor. The move in *PUDR* and *Sanjit Roy* tied constitutional protection to labour standards, not only to the presence of chains or guards. This not only prevents evasion via nominally “voluntary” arrangements but also constitutionalises wage-law compliance.

7.2 Compulsory service: public purposes and boundaries

Article 23(2) recognises that certain public purposes may justify compulsory service. Military service is the classic example; contemporary Indian litigation focuses on medical bonds. The constitutional test is twofold: the service must be for a genuine public purpose, and its imposition must be non-discriminatory and reasonable in design. The 2019 doctors' bond judgment situates this within policy discretion, while leaving open that exploitative or arbitrary impositions could still fall afoul of Articles 14/23

7.3 Child labour: hazardous vs. non-hazardous; the family-enterprise exception

Article 24's hazardous-work limitation has long produced line-drawing problems. The 2016 amendment's allowance for children to “help” in family enterprises drew criticism for potentially masking commercial child labour under a familial label and for diluting enforcement in the informal sector. Defenders argue that the amendment narrows

pre-existing exceptions and restricts such “help” to after-school hours or holidays; critics fear it normalises child work where monitoring capacity is weakest⁸ Judicially, *M.C. Mehta’s* structural remedies and *Salal’s* classification work to push sectors into the “prohibited” zone for children.⁹

7.4 Interlocking regimes: education and wages

Post-2009, Article 21A and the RTE Act change the presumption regarding child time use schooling is paramount. Meanwhile, the Code on Wages’ universal minimum-wage framework strengthens *PUDR’s* constitutional minimum for adult labour. These two developments, taken together, re-anchor Articles 23 - 24 in a rights-based policy matrix: children must be in school; adult labour must meet wage floors.¹⁰

7.5 From IPC §370 to BNS §§143 -144: continuity and change

The BNS codifies trafficking of persons and exploitation of trafficked persons in provisions corresponding to IPC §370/370A, ensuring doctrinal continuity while modernising language and penalties. Government ready-reckoners and legislative tables map these correspondences, important for enforcement agencies and courts during the transition away from the IPC

8. Enforcement: Institutions, Data, and Policy Instruments

8.1 PIL and epistolary jurisdiction

Beginning with *Bandhua Mukti Morcha*, courts adopted flexible standing, fact-finding commissions, and continuing mandamus to convert paper rights into practical reliefs. This modality often featuring on-site inspections, affidavits from Labour Commissioners, and judicially supervised compliance has been indispensable to Articles 23 -24 enforcement in vast, informal labour markets.¹¹

8.2 Administrative platforms and schemes

The PENCIL portal (2017) institutionalises a national complaint, tracking, and convergence platform for child labour rescues, aligning police, labour, education, and district authorities. It complements National Child Labour Project (now subsumed under

Samagra Shiksha) and state schemes for rehabilitation and schooling.¹²

8.3 Minimum wage floors and Article 23

By making the minimum wage floor universal across employments, the Code on Wages reduces the room for “lawful” underpayment that *PUDR* flagged as constitutionally suspect. Although full nationwide operationalisation has been staggered, policy communications emphasise periodic review and a central floor wage to prevent a “race to the bottom”.¹³

8.4 Inter-sectoral coordination: trafficking

The modern trafficking framework ITPA, Criminal Law (Amendment) Act 2013, and now BNS requires coordination across police, labour, social welfare, and consular (for cross-border flows) agencies. MEA and MHA guidance documents spell out this convergence, reflecting Article 23’s ban on trafficking as a constitutional anchor for criminal process and victim protection.¹⁴

9. Comparative and International Perspectives

Article 23’s abolition of forced labour resonates with ILO Convention No. 29 (ratified by India in 1954) and with global norms that see forced labour as per se violative of human dignity. Ratification of Conventions 138 and 182 in 2017 aligns Article 24 with global child-labour baselines, particularly regarding the minimum age for employment and the worst forms of child labour.¹⁵ Indian courts and policymakers increasingly reference these standards when calibrating hazardous-work lists, school-to-work transitions, and rehabilitation models.

10. Persistent Challenges

10.1 Measuring the incidence

Reliable national-level measures for bonded labour and child labour remain contested; underreporting and definitional variance complicate policy design. The shift to platforms like PENCIL aims to improve detection and coordination, but capacity gaps in inspection and rehabilitation services persist, especially in informal and home-based sectors.

⁸ Government of India. *Child and Adolescent Labour (Prohibition and Regulation) Act, 1986* (as amended 2016), official text. India Code PDF.

⁹ *Labourers Working on Salal Hydro Project v. State of J&K*, (1984) 3 SCC 538. CaseMine summary / Indian Kanoon fragment.

¹⁰ Government of India. *Right of Children to Free and Compulsory Education Act, 2009*, official text. India Code PDF.

¹¹ *Bandhua Mukti Morcha v. Union of India*, (1984) 3 SCC 161; AIR 1984 SC 802.

¹² Ministry of Labour & Employment. “PENCIL Portal” (official page; launched 26.09.2017).

¹³ Press Information Bureau. “Code on Wages Act, 2019 stipulates review of minimum wages every five years” (23 March 2023).

¹⁴ Government of India. *Immoral Traffic (Prevention) Act, 1956*, official text

¹⁵ International Labour Organization. “India ratifies ILO Conventions No. 138 and 182 on child labour” (Press release, 13 June 2017).

10.2 Family enterprises and domestic work

The family-enterprise exception continues to produce “grey markets” of child work in household or caste-linked occupations, where surveillance is minimal and economic coercion is subtle. Critics urge either repeal or much tighter conditions (e.g., registration, hour limits, independent verification), to ensure Article 24’s promise is not diluted in practice

10.3 From legal minimums to living standards

While *PUDR* constitutionalised the minimum wage, contemporary debates ask whether a “floor wage” suffices to block exploitation in high-cost regions, or whether an evolving constitutional principle of “living wage” should guide policy. The Code on Wages’ floor wage is a start, but state-level minima and enforcement determine whether the Article 23 guarantee has material content

10.4 Compulsory service and fairness

Compulsory public-purpose service, if mis-designed, can produce discriminatory burdens or function as disguised wage suppression. Judicial deference to policy, seen in the doctors’ bond case, must be balanced by vigilance against arbitrary or punitive conditions, especially where service occurs in under-resourced settings that undermine professional standards. The Article 23(2) exception cannot swallow the Article 23(1) rule

11. Doctrinal Synthesis

Three doctrinal strands emerge from forty years of case law:

1. **Expansive “forced labour”:** Article 23 covers economic coercion and underpayment relative to statutory minima; begar functions as a meta-category of unfree labour. *PUDR* and *Sanjit Roy* are canonical
2. **Structural remedies and horizontality:** *Bandhua Mukti Morcha*, *Neeraja Chaudhary*, *Salal*, and *M.C. Mehta* show a willingness to design supervisory remedies committees, inspections, rehabilitation funds and to bind private actors directly under Articles 23 -24
3. **Inter-textuality:** Articles 39(e) -(f), 21A, and wage statutes inform the interpretation of Articles 23 -24. The Court’s method is not atomistic; it knits constitutional and statutory

law into an enforceable anti-exploitation framework

12. Policy Recommendations

(a) Clarify and narrow exceptions

The family-enterprise exception in the 2016 child-labour amendment should be reconsidered. If retained, it must be ring-fenced by: (i) registration with local authorities; (ii) strict hour caps certified by schools; (iii) surprise inspections backed by community child-protection committees; and (iv) unambiguous prohibition of any “family work” in scheduled hazardous processes

(b) Make minimum wages real

Accelerate implementation of the Code on Wages’ floor wage with transparent indexation; align state minima with consumption baskets; and integrate wage-violation detection into labour and social-welfare inspections. Because sub-minimum pay is “forced labour” for Article 23 purposes, wage enforcement is constitutional enforcement.¹⁶

(c) Data and coordination

Mandate uniform rescue-to-rehabilitation data standards across PENCIL, JJ systems, and labour departments. Public dashboards with anonymised district-wise statistics would improve accountability and enable empirical evaluation of Article 23 -24 enforcement.¹⁷

(d) Strengthen rehabilitation

Resource bonded-labour and child-labour rehabilitation funds with predictable, rule-bound disbursements, drawing on *M.C. Mehta* and *Bandhua* models. Rehabilitation must include education, skill training, and income support, ensuring non-recidivism

(e) Trafficking coherence under BNS

Issue uniform prosecutorial and police SOPs mapping IPC §370/370A precedents to BNS §§143 -144 to avoid transitional confusion; train investigators on evidentiary standards (means -purpose -act triad) and victim-centred approaches.¹⁸

13. Conclusion

Articles 23 and 24 are deceptively concise. Judicial interpretation has revealed their transformative potential: a constitutional wage floor through Article 23; a prohibition focused on the child’s best interests in Article 24; and a public-law remedial toolkit that

¹⁶ *Association of Medical Super Speciality Aspirants & Residents v. Union of India*, W.P. (C) No. 376 of 2018, Supreme Court of India, Judgment dated 19 Aug 2019 (compulsory service bonds).

¹⁷ BPRD, MHA. *Ready Reckoner on Provisions of Laws for Tackling Human Trafficking* (noting BNS §143).

¹⁸ Ministry of Home Affairs. *The Bharatiya Nyaya Sanhita*, 2023 (Act 45 of 2023)

treats rescue, rehabilitation, and schooling as legal obligations. Statutory evolutions from the 1976 Bonded Labour Act to the 2016 child-labour amendments, the 2013 trafficking reforms, the 2019 wage code, and the 2023 BNS interlock with these articles to create a dense compliance environment. Yet vigilance is necessary: exceptions and capacity gaps can erode constitutional guarantees. The way forward lies in consolidating doctrinal gains, refining statutes and SOPs, investing in enforcement and rehabilitation, and grounding the right against exploitation in robust, data-driven public administration. In doing so, India honours the framers' promise that labour adult or child will not be the site of subordination, but of dignity.

16. Conclusion

Victimology in India has unmistakably traveled from **marginalization** to **recognition**. The arc runs from constitutional torts to codified procedures; from sporadic compensation to State-backed schemes; from invisibility to rights of notice, participation, protection, and rehabilitation. The 2008 CrPC amendments and subsequent jurisprudence made victims visible; the 2012/13 reforms and administrative schemes made support tangible; the 2018 witness-protection mandate made participation safer; and the 2024 BNSS/BNS framework embedded **process-level guarantees**, e-FIR, 90-day updates, and medical-treatment enforcement, into the **everyday** of criminal procedure.

Yet the task is unfinished. Recognition must mature into **reliable realization**, timely compensation, accessible services, informed participation, and safety, for all victims, especially the most vulnerable. If law's purpose is the dignified repair of social harm, then India's evolving victimology, calibrated to constitutional values and international norms, is not a peripheral project; it is justice's central promise.¹⁹

Disclaimer/Publisher's Note: The views, findings, conclusions, and opinions expressed in articles published in this journal are exclusively those of the individual author(s) and contributor(s). The publisher and/or editorial team neither endorse nor necessarily share these viewpoints. The publisher and/or editors assume no responsibility or liability for any damage, harm, loss, or injury, whether personal or otherwise, that might occur from the use, interpretation, or reliance upon the information, methods, instructions, or products discussed in the journal's content.

¹⁹ NALSA: *Statistical Information in r/o Victim Compensation Scheme u/s 357-A CrPC* (Apr 2024-Mar 2025), state-wise applications and amounts.