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Interim Compensation: A Solace to Crime Victims

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ABSTRACT

We all are living in a welfare state and state is owing duty to maintain Law and order in the society. No one can take the law in their own hands. If any offence has been committed to any person and anyone violating the fundamental rights of other person than he should go to police and report the incidence. Now the question is.... why he is approaching police? He wants Justice and Justice means complete justice that should be seen from both facets. Justice includes everything such as punishment to offenders and compensation to victims. Now-a-days trends have been changed and victims are receiving the compensation in addition to the punishing the offenders. But this paper revolves around the concept of interim compensation to the victims of crime. To complete this study the pilot survey has been conducted by the researcher. The data has been taken form the four districts of malwa region of Punjab. The respondents of this survey were Judges and advocates. The data has been taken as per their population size. The trends shows that victims are not getting an interim compensation, no doubt they are getting the compensation at the end of their cases when everything come on the record. But the purpose of section 396(6) of BNSS has not been accomplished.

Keywords: Compensation, victims, offender, society, interim, criminal Justice system.

I. INTRODUCTION

The aim of criminal justice is to protect the rights of all the stakeholders viz- victim, offender and society. But India has offender- oriented criminal justice system. In a penal couple, there are two persons – accused and victim but the system is continuously vigilant for the sake of accused such as right to bail, right to health, right to inform the relative and so on. Plight of crime victims is very miserable. Victim always feel overlooked in the whole justice system indeed he is a real hero. He is treated as step child. His condition is like mendicant at door step of dispensation of justice. His agony starts when he becomes the bye-product of any crime. Crime victims get only torments in return of reporting the crime, no one worries about him. Our CJS always focus to punish the offender that he should be behind the bars for the wrong act

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which has been done by him. But this is one-sided justice as:

Justice should not be DONE only but it should be SEEN from both the angles i.e. Victim and offender.

If the offender gets the punishment and crime victim must be compensated for his sufferings. Compensation provides some relief to the victims of crime. The justice should be restorative justice. With this paradigm, on the recommendations of 154th report of Law Commission of India and Malimath Committee Report, in 2008 parliament has inserted the section 357 A under the Code of Criminal Procedure, 1973. Now s. 357 A has been replaced by s. 396 of BNSS. This section particularly deals with Victim Compensation Scheme (VCS). It mandates all the states throughout India to make its own Victim Compensation Scheme for crime victims. But the dilemma is that there is no uniformity in compensation it diverges from state to state.

This study emphasises on concept of interim compensation to crime victims. As section 357 talks about the compensation at the time of acquittal and conviction but this VCS can provide the compensation as first aid facility to the victim. The procedure has been established under this section. In plethora of cases the Supreme Court urged for applying the provisions of section 395 as well as section 396 of BNSS with its same essence as it has been made but the judges had often used it. **Ankush Shivaji Gaikwad Case²** also confers the mandatory duty on the courts to apply its mind to the question in every criminal case. Application of mind to the question is best disclosed by recording reasons for awarding/refusing compensation. In **Mallikarjun Kodagali v. State of Karnataka**,³ victim has right to file an appeal. But if victim is not properly heard than there is need to raise his voice to get it. In **Jagjeet Singh v. Ashish Mishra @ Monu & ors.**,⁴ right to participate in proceeding is vested right of the victim by the code of criminal procedure but it is like brutum fulmen. Neither binds nor bars the courts. In **Girish Suneja v. Central Board of Investigation**,⁵ observed that rights of accused overwhelm rights of victim. There is need to maintain the harmony between them. Victim rights vis-a-vis accused rights should be treated equally. The court needs to maintain the balance between them. The role of courts in CJS is more vibrant and momentous than that of the police as the foremost functions are to impart free, fair, speedy and impartial justice. Dither approach leads to defeat the real purpose of these laws.

² Ankush Shivaji Gaikwad v. State of Maharashtra, 2013 (6) SCC 770

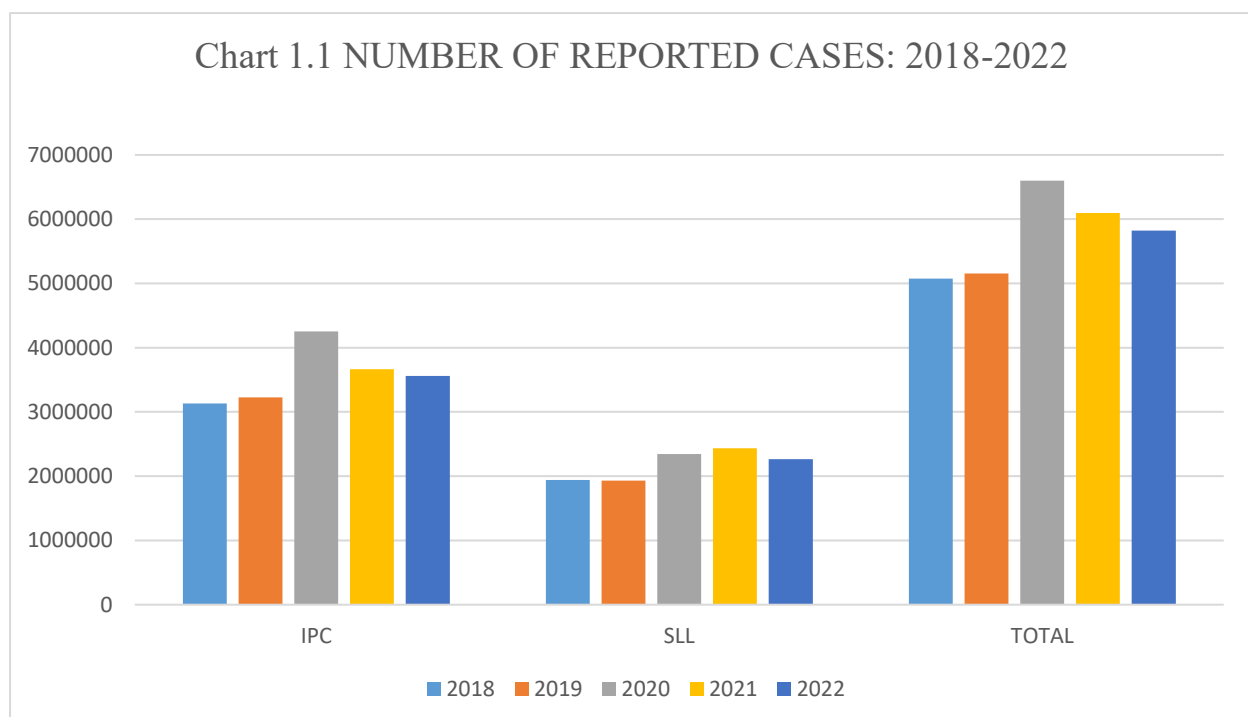
³ (2019) 2 SCC 752

⁴ 2022 SCC online SC 453

⁵ (2017)14 SCC 809

(A) Problem Statement

Crime victims have faced the interrogations, delays, humiliation and many more. Compensation works as solace to his sufferings. The idea of victim compensation is not an innovative. Benjamin Mendelsohn is the father of victimology who has started the victim paradigm in 1940s. Immense work has been done for the sake of victim at international level such as in New Zealand, U.K, USA, Australia. These countries have made uniform laws for Victims of Crimes. Now a days, even in India every state and UT's have its own Victim Compensation Scheme under section 357 A. Under this section, compensation and an interim compensation has been provided to victims. But the main problem is that Courts are very reluctant to award the compensation to crime victims. This paper covers one aspect i.e. interim compensation only. This research will find out the causes why an interim compensation has not been awarded to crime victims. How many victims are being benefitted through DALSA and SALSA under section 396 of Bhartiya Nagarik Suraksha Sanhita (Previous law s. 357A of Cr. P.C.) in Punjab as well as Patiala district particularly. Crime India Report reveals that in 2021, 60,96,310 cases have been reported under Indian Penal Code as well as Special & Local Laws with Crime Incidence of 488 approximate per one lakh of population. Following chart 1.1 exhibits number of crime victims increasing day by day. But the crime in India report 2021 reveals that there is decline in 4.5% cases (58,24,946) throughout India:



Source- Crime in India 2022

(B) Literature Review

Rajan, V.N. (1981) in his book, *Victimology in India* explores the development of victimology in India and draws attention to the issue of victims. He serves as an example of the hardship of a victim who is overlooked by the criminal justice system. The author looks at a number of issues faced by victims, such as interrogations, delays, postponements, court appearances, insults from lawyers and police, loss of income, time waste, and frustration. According to the author, victim compensation can help increase public confidence in the criminal justice system.

154th Report of Law Commission of India (1996) on Code of Criminal Procedure, 1973 contemplates its view in favour of crime victims and also suggested to take steps for to remove or alienating the sufferings of all prisoners irrespective of their under trial, convicted prisoners. It gives stresses on protection of victims of crime by awarding compensation to crime victims.

Bajpai, G.S. (1997) in his book, *Victims in the Criminal Justice* exposes several inequities and disparities in the existing system of criminal justice in India. He also suggests that State must owe the responsibility to compensate the crime victims and victim should have a right to get compensation. The main theme of his research work is the victims' problems and grievances vis-à-vis criminal agencies. His study has proposed a complete scheme of victim assistance in India.

Vibhute, K.I (2004) in his book *Criminal Justice*, shows his displeasure that our legal framework related to compensation is fragmentary in nature and inadequate. The courts often used these provisions. Existing laws associated with compensation to victims of crimes requires updations.

Mundrathi, S. (2007) in his book *Law on Compensation* has urged on interim compensation should be provided to the victims to enable them to successfully fight a case in court, meet medical and other ancillary expenses.

Andrew, K. (2010) in his book *Crime Victims An Introduction to Victimology* points out that victims have been a part of society from ancient times. Victim and the idea of sacrifice were related. A victim was formerly a person or an animal who was killed during a religious event to placate a supernatural being or deity. The word victim has acquired new connotations throughout the years. These days, it frequently refers to those who have experienced harm, loss, or difficulty for any reason. Illegal actions cause harm to crime victims.

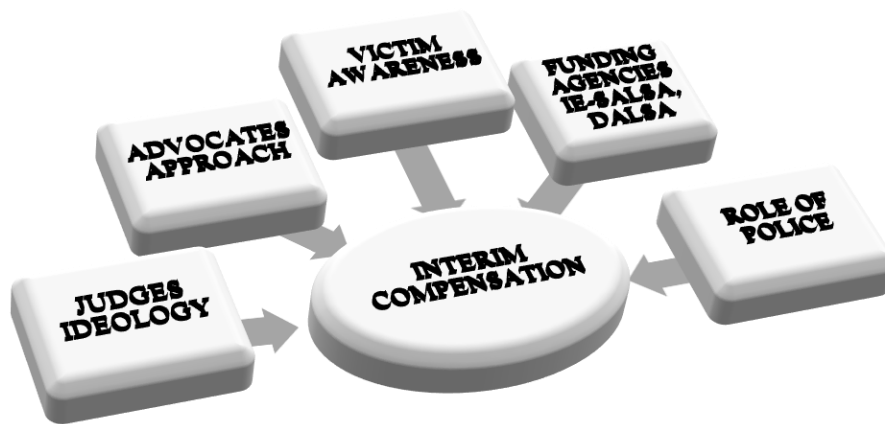
Bajpai, G.S. (2012) in his book *Criminal Justice System Reconsidered Victim & Witness Perspectives*, highlights the issues and problems as main plank to suggest the agenda of reforms in Criminal Justice System.

Bajpai, G.S. & Gauba, S (2016) in their book *Victim Justice- A Paradigm Shift in Criminal Justice System in India*, expressing their concerns towards victims of crime. In India adversarial

criminal justice system is prevalent in India. The authors also feel that least literature is available in market related to victim. This book talks about the substantive and procedural rights of victims. The authors support the vision that the monetary compensation and soft approach towards victims increase their level of satisfaction.

The literature on this topic is very scant and erratic as there are few authors who have worked on victims' perspective in criminal justice system. They all have focussed only on Compensation but the present study implores towards interim compensation to mitigate the unavoidable circumstances in his up and downs during the case.

II. CONCEPTUAL FRAMEWORK



(A) Scope and objectives of the study

The study will cover Malwa region from Punjab i.e. Patiala, Ludhiana, Fatehgarh Sahib and Mohali districts. The researcher will also take the detail of compensation fund as well as its distribution from the DALSA and SALSA (2008 to 2022). The study will cover up the statutory provisions related to compensation along with the reported judgements.

The objectives of the study are as follows:

- To analyse the victim compensation schemes along with amount under section 357A in all the states
- To trace out the causes which are responsible for not awarding interim compensation to crime victims.

(B) Research Questions

- Whether the victims are aware about the concept of interim Compensation?
- Why the courts are reluctant to award compensation to crime victims?

- What are the responsible factors for non-implementation of s. 357 A (6)?
- Whether the interim compensation mechanism is effective?
- What measures to be taken to improve it?

(C) Hypothesis

This research commences with this problem statement and researcher has presumed that:

- The courts are reluctant to award the interim compensation to crime victims.
- The crime victims are not well aware about this benevolent piece of legislation under section 357A (old Code) / 396 of BNSS (new Code)

(D) Research design and methodology

The researcher will use an empirical research methodology to complete this study. The data will be collected from Patiala and Ludhiana, Fatehgarh Sahib and Mohali courts, Police Station, DALSA and SALSA (Malwa region in Punjab) by visiting personally to accomplish this work. The study will cover the time period from 2008 to 2021 on random basis.

III. VICTIMS OF CRIME

The word ‘victim’ has been defined under the Bhartiya Nagarik Suraksha Sanhita, 2023 under section 2 (x). It shows that how much the system is concerning about the victims of crime who are the real heroes of the criminal justice system. In simple words, whose (individual or collective in nature) rights are infringed by other is called a victim. As a result of violation of his legal rights, the person can suffer from physical, emotional and financial loss. He is always pondering as an ignorant character who cannot attract the sympathy from the administration of justice. In other developed countries⁶, Victims and his sufferings fetch the attention of the government. They have made the proper laws⁷ for their protection. They have recognized their place in criminal justice system. They have adopted the inquisitorial criminal justice system rather than adversarial system. They give the importance to victim of crimes which they actually deserve. The victim of crime does not cover only the victims but it also talks about the dependants, legal heirs, an immediate family of the victim if the victim of crime died in the incident.

⁶ United States of America, Australia, United Kingdom, Canada, New Zealand, Japan

⁷ Victims of Rights Act, 2004, Payment of Benefits to Victims of Crime, 1980, Criminal Injuries Compensation Scheme, 1964, Basic Principles of Justice for Victims of Crime and Abuse of Power, 1985, Criminal Injuries Act, 1963

(A) Compensation

Literal meaning of compensation is to provide the solace and monetary help to the victims of crimes (including dependants). As justice should be seen from both facets. According to the principles of natural justice, both the parties should be treated equally without any bias. Justice entails that a person who suffered, must be compensated. In criminal law, s. 545 and s. 357 of the old and new code of Cr.P.C respectively and s. 395 of BNSS itself empowered the criminal courts to award the compensation to victims of crime but the courts are reluctant to it. 41st report of Law Commission⁸ also criticized the judiciary on this point that Judges are having discretionary power to this regard but they seldom used it. As they are not exercising their power as freely and liberally as it has conferred on them, not achieving real purpose of this benevolent piece of legislation. Compensation increases the efficacy of the judiciary. Compensation ponders as a mitigating factor in administration of justice.

(B) Interim compensation

No particular definition is prevalent for an interim compensation. Interim compensation is also part of compensation but it can be awarded during the litigation. It provides in the form of first aid facility to the crime victims. It helps the victims to bear their financial loss to some level. But the cases related to it are very rare. In **Bodhisattwa Gautam v. Subhra Chokraborty**⁹ Rs. 1000/- has been awarded to crime victim as an interim compensation. Section 357 A (6) of Cr.P.C talks about it. It has empowered the SALSA, DALSA and also includes the Police officer (not below the rank of the officer incharge of police station) or Magistrate of the concerned area to order any interim relief as immediate first aid facility to alleviate the suffering of the victim. This paper mainly focuses towards the concept of interim compensation only. In recent cases **Mallikarjun v. State of Karnataka**,¹⁰ **Girish Kumar Suneja v. Central Board of Investigation**¹¹ and **Jagjeet Singh v. Ashish Mishra @Manu & ors.**¹² the emerging trends of courts have shown that victim should be treated with dignity and his rights should not be violated in way of secondary victimization while dispensation of administration of justice. But they are not taking about an interim compensation which is key concern to write this paper. Now-a-days, compensation to victim of crimes have been awarded at the end of the case but no data is available in which an interim compensation has been awarded to crime victim. It has been noticed that the interim compensation has been awarded in cases related to dishonour of

⁸ 41st report of Law Commission of India, The Code of Criminal Procedure, 1898 (1969)

⁹ 1996 AIR 922

¹⁰ *Supra* note 2

¹¹ *Supra* note 4

¹² *Supra* note 3

the cheque under negotiable instrument. In Acid attack and rape cases, the medical facilities are available to the victim but no interim compensation has been awarded. Section 125 of Cr.P.C. also provides maintenance (as interim compensation) on monthly basis until the case has been disposed off and Section 138 of Negotiable Instrument Act provides for interim compensation (in cases related to cheque bounced) but there is a limit of 20% interim compensation.

(C) Role of DALSA/ SALSA in awarding compensation-

According to section 396 of BNSS, every state government has to be prepared the victim compensation scheme to provide funds to compensate the crime victims. It is mandatory in nature as word ‘Shall’ has been used by the parliament. The recommendation has been made by Court to award compensation to DALSA/ SALSA. After getting the recommendation, the quantum of compensation has to be decided as per the scheme made by government of concerned state. The state has to make the scheme with the coordination of centre govt. which is again problematic task if there is govt. dichotomy at both the levels. After visiting the office of DALSA in Patiala and Fatehgarh Sahib, researcher has found that they have released only final compensation and not awarding interim compensation.

For instance, in Fatehgarh Sahib, only in 2 no. cases. interim compensation have been released. The amount of compensation released under POCSO is 5000/- (dated- 19-2-2020) and in rape case is 75000/- (dated- 22-7-2018). In Patiala, no case has been found till now in which an interim compensation has been awarded. The fund has been received from the government on yearly basis or in lump sum. On other facet to this, no application has been received from the police officer, as he is empowered under section 396 (6) to recommend the case to DALSA, SALSA if medical aid is required to crime victim.

IV. ANALYSIS OF VICTIM COMPENSATION SCHEMES

The victim compensation scheme varies from state to state which leads to disparity in awarding compensation to victims of crime. For example, in two heinous crimes rape and acid attacks, compensation had varied from state to state which is shown as under:

Table 1.1 – Victim Compensation Schemes under section 357 A in different States/UT’S

S. No	Name of States/UT in India	Rape	Acid Attack
1	Andhra Pradesh (6.12.2016)	3 Lakh	3 Lakh

2	Arunachal Pradesh (24.1.2012)	50,000	1 Lakh
3	Assam (18.10.2012)	1Lakh	1,75000
4	Bihar (28.7.2011)	50,000	25,000
5	Chhattisgarh (3.8.2014)	25,000	50,000
6	Goa (14.12.2012)	10 Lakh	10 Lakh
7	Gujarat (5.1.2013)	1 Lakh	50,000
8	Haryana (3.4.2013)	3 Lakh	1 Lakh
9	Himachal Pradesh (6.9.2012)	50,000	50,000
10	Jammu & Kashmir (23.4.2013)	50,000	20,000
11	Jharkhand (3.8.2012)	20,000	--
12	Karnataka (19.9.2013)	40,000	--
13	Kerala (21.2.2014)	3 Lakh	3 Lakh
14	Madhya Pradesh (31.3.2015)	3 Lakh	3 Lakh
15	Maharashtra (11.4.2013)	3 Lakh	3 Lakh
16	Meghalaya (25.9.2014)	3 Lakh	3 Lakh
17	Manipur (5.8.2011)	30,000	50,000
18	Mizoram (5.12.2011)	50,000	--
19	Nagaland (18.12.2012)	1 Lakh	--
20	Odisha (12.7.2012)	3 Lakh	1Lakh
21	Punjab (15.10.2013)	3 Lakh	5 Lakh
22	Rajasthan(12.7.2012)	3Lakh	2Lakh
23	Sikkim(24.6.2011)	50,000	30,000

24	Tamil Nadu (30.11.2013)	3 Lakh	3.5 Lakh
25	Tripura (13.8.2013)	50,000	50,000
26	Uttar Pradesh (9.4.2014)	2 Lakh	3 Lakh
27	Uttarakhand (16.7.2013)	2.5 Lakh	1,50,000
28	West Bangal (6.7.2012)	20,000	--
29	Delhi (13.7.2016)	3 Lakh	3 Lakh
30	Chandigarh (3.9.2012)	3 Lakh	3 Lakh
31	D &N Haveli (13.8.2012)	3 Lakh	3 Lakh
32	Daman& Diu (22.4.2016)	3 Lakh	3 Lakh
33	Lakshdweep(16.12.2012)	3 Lakh	3 Lakh
34	Puduchery(13.6.2011)	3 Lakh	3 Lakh

Source-Notification Victim Compensation Scheme of States/UT's in India.

Table 1.1 reveals variance in victim compensation schemes provided by each state as per made under section 396 of BNSS. It shows concern of every government for their crime victims that how much vigilant and alarming they are towards their victims of crime? Each states give different compensation for same offence like: in Goa Rs 10 Lakhs to the rape victim whereas the scheme of Delhi provides for Rs 3 lakhs as maximum compensation with states like UP having provisions of further low compensations to such victims. It also divulges that each state provides list of offences for which the compensation is provided such as Kerala govt. ponders twenty offences, Delhi govt. considers ten offences, Gujarat govt. nine offences and Meghalaya govt. only two offences. Thus, there is no standardisation neither in subject matter nor in amount of compensation given to victims of crime.

V. DATA ANALYSIS

This working paper is based on pilot survey. In this, the responses of advocates and judges on an interim compensation have been collated from 4 districts of Malwa region i.e. Patiala, Fatehgarh Sahib, Ludhiana and Mohali. Table 1.1 exhibits the highlights of this survey and demonstrates the detailed responses of respondents during the survey. It divulges that majority of respondents i.e. 65.3% strongly agree and 30.6% agree that an interim compensation is a very

advanced step towards victims of crime, as through this, the victims can get the support from judiciary in a monetary way and it also serves the restorative justice to victims. It should be mandatory in all the cases under criminal law specially in rape and acid attack victims. It also exhibits that lack of awareness on the part of victims of crime plays significant role in not awarding the interim compensation to them and they are not approaching the courts for getting it during the litigation. Actually, they are not well aware about their rights which are enshrined by law as such. 52% respondents are agreeing and 22% strongly agree that there is lack of awareness at the part of victims. Hence, the hypothesis second has been proved here.

The survey also explores unanimous approach of majority respondents that an interim compensation should be awarded on the basis of paying capacity of accused and it should be awarded when the guilt of accused has been proved beyond the reasonable doubt until and unless it should not be awarded during the case. Table no 1.1 also shows the trends of responses of research population. This practice will certainly upsurge the reliance of general public in Judiciary. The advocates being respondents are also supporting the view that advocates are playing vital role in it, means their involvement is significant as mediator between the victim and judges. 46% respondents are agreeing and 18% strongly agreeing that our legal framework related to interim compensation is inadequate. Hence, hypothesis one has been proved here.

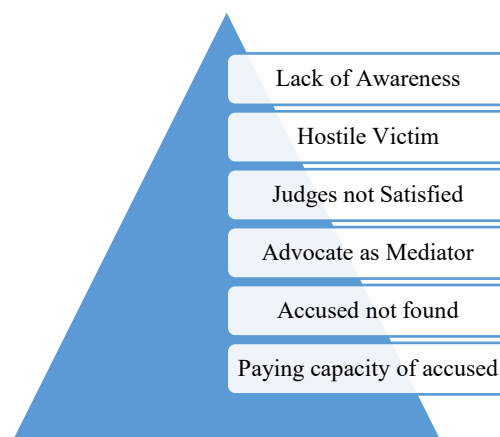
Table no. 1.1 – Showing the highlights of Pilot Survey

Sr.No	Parameters	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
1	Mandatory Interim Compensation	65.3%	30.6%	2%	2%	---
2	Restorative justice	8%	48%	16%	24%	4%
3	Victim's Lack of awareness	22%	52%	6%	16%	4%
4	Role of Advocates	22%	50%	22%	4%	2%
5	Role of Judges	8%	14%	52%	24%	2%
6	Capacity of offender	18%	48%	12%	22%	---
7	Guilt of accused	22%	44%	12%	18%	4%

8	Inadequacy of Legal framework	18%	46%	18%	16%	2%
9	Faith in Judiciary	20%	46%	26%	6%	2%
10	Monetary help	14%	46%	20%	18%	2%

VI. FACTORS RESPONSIBLE

The findings of the pilot survey are as follows:



- 1 **Lack of Awareness-** The respondents believe that there is lack of awareness at part of victims plays significant role for not awarding an interim compensation to them.
- 2 **Hostile victim-** Some advocates' observation is that sometimes complainant can be turned hostile so it should be awarded only where the guilt of accused has been proved beyond the reasonable doubt
- 3 **Advocate as Mediator-** The advocate (being a key character) acts as mediator, due to his reluctance, victim does not get the interim compensation.
- 4 **Accused not found-** Sometimes the accused not found and it becomes difficult to get the interim compensation at this level
- 5 **Judges not satisfied-** Court should award the interim compensation if the judge is fully satisfied from the victim that he had suffered at the hands of accused.
- 6 **Paying capacity of accused-** Majority of respondents agree that paying capacity of accused also affects the interim compensation.

VII. SUGGESTIONS

The suggestions from the pilot survey are as follows:

- Dearth of Awareness can be removed by organising legal awareness programs such as free legal aid camp in rural as well as in urban areas to disseminate the knowledge to general public towards their rights.
- Judges should be impartial while dispensation of justice between junior and senior advocates.
- Interim compensation should be based on the paying capacity of accused only and in exceptional cases the state should come forward to pay the interim compensation where accused is either indigent or not traced.
- The interim compensation mechanism is at the stage of infancy, the govt. should take the effective steps to develop the system properly.
- Separate legislation should be made for an interim compensation in all criminal cases.
- There should not be disparity in criminal cases, the medical facility is only available to rape victims, POCSO and Acid attacks.
- Interim compensation should be made mandatory in all cases under criminal law which will lead to increase the confidence of general public in judiciary.
- The justice should be speedy justice. It is also part of fundamental right under the Constitution.
- As our judicial system is adversarial in nature which mainly focused on accused rather than victim. The judiciary should sustain harmony between the rights of victims vis-à-vis rights of accused.
- The principle of natural justice should be followed with same spirit as it is made.
- Interim compensation will be as mitigating factor to provide the restorative justice to all the stake holders.

VIII. CONCLUSION

The above-mentioned discussion leads to conclusion that an interim compensation is not awarded by the courts as such. No doubt, there is increase in no. of cases in which the compensation has been awarded to the crime victims under criminal law. Now judiciary is taking progressive steps towards the victims also. But the main focus of this paper is to gather the information regarding the award of interim compensation and to know the ground reality why it has not been awarded by the courts. After analysing the factors and responses of respondents, one thing is crystal clear that no one is bothered about awarding an interim

compensation to them, who are indeed in a miserable situation. Reason may be the lack of awareness on the part of victim himself, initiative at part of advocate and judge. But there is dearth of consciousness on this point.

One point is more that an interim compensation should be awarded when the guilt has been proved beyond the reasonable doubt. But this could lead to the end of the case than it will cross the stage of interim compensation during the litigation. Therefore, there should be an effective mechanism through which the interim compensation can be awarded to the crime victims at initial stage of their case. This is the need of the hour.

Indeed, now judiciary is vigilant towards victims of crime but much a lot is pendant for the sake of victims. Existing victim rights are still like *Burtum fulmen*. It is bitter truth of current scenario.

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