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A Critical Analysis of the Victim Compensation Scheme for Acid Attack Survivors

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ABSTRACT

Acid attacks are one of the cruelest forms of violence, causing permanent physical injuries, psychological trauma, and long-term social and economic suffering for survivors. Victims often face disfigurement, disability, repeated surgeries, emotional distress, and social isolation, making rehabilitation extremely difficult. In India, legal reforms have introduced specific provisions to address acid attacks and provide compensation to survivors through the Victim Compensation Scheme. This study critically analyses the Victim Compensation Scheme for acid attack survivors in India by examining its legal framework, implementation, and effectiveness in ensuring proper rehabilitation. It focuses on whether the compensation provided is sufficient to meet medical expenses, psychological support, and livelihood restoration.

The study finds that although the legal framework is progressive, its implementation remains weak due to delays in compensation disbursement, inadequate financial support, lack of awareness, procedural difficulties, and poor rehabilitation measures.

Compensation often fails to cover long-term treatment and social reintegration. The study concludes that victim compensation should be treated as a constitutional right and not as charity. It suggests the need for uniform compensation across states, timely disbursement, stronger institutional support, and a more victim-centric rehabilitation system to ensure meaningful justice for acid attack survivors.

Keywords: *Acid Attack Survivors, Victim Compensation Scheme, Rehabilitation, Legal Framework, Implementation Challenges, Compensation Adequacy, Psychological Trauma, Medical Expenses,*

I. INTRODUCTION

Acid attacks are among the most brutal and inhuman forms of violence. They cause permanent physical injuries, severe emotional trauma, and lifelong social and economic difficulties for survivors. In most cases, acid attacks are committed with the intention of punishing,

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controlling, or taking revenge, especially against women. The use of acid makes this crime particularly cruel because it not only harms the body but also destroys confidence, identity, and dignity.

In India, acid attacks have become a serious concern because of the easy availability of corrosive substances and the lack of awareness regarding their regulation. Survivors often suffer from severe burns, facial disfigurement, blindness, loss of hearing, and permanent disability. Apart from physical pain, they also experience depression, anxiety, social rejection, and unemployment. Many survivors require multiple surgeries, long-term medical treatment, counselling, and rehabilitation, which involve huge financial expenses.³

For many years, Indian criminal law did not specifically recognize acid attacks as a separate offence. Such crimes were usually dealt with under general provisions related to grievous hurt. This created serious legal gaps because acid attacks are different from ordinary physical assault due to their permanent and devastating consequences. Recognizing this issue, the Criminal Law (Amendment) Act, 2013 introduced Sections 326A and 326B into the Indian Penal Code, specifically dealing with acid attacks and attempts to throw acid.

At the same time, the law relating to victim compensation also developed. Section 357A of the Code of Criminal Procedure made it compulsory for every State Government to establish a Victim Compensation Scheme to provide financial support to victims of serious crimes, including acid attacks. The Supreme Court of India, especially in the landmark case of *Laxmi v. Union of India*, further strengthened this framework by directing all states to provide a minimum compensation of ₹3 lakh to acid attack survivors and ensure free medical treatment.

These reforms were important steps toward justice, but serious problems still remain. In many cases, compensation is delayed, insufficient, or difficult to access. Different states follow different rules, creating inequality among victims. Many survivors do not receive proper rehabilitation support such as counselling, education, skill development, or employment opportunities. As a result, compensation often remains limited to financial relief rather than complete restoration of dignity and life.

Victim compensation should not be treated as charity. It is a legal and constitutional duty of the State under Article 21 of the Constitution, which guarantees the right to life and dignity. When the State fails to prevent such crimes, it must ensure that survivors receive proper support and rehabilitation. Justice must include both punishment of the offender and restoration of the

³ *Laxmi v Union of India* (2014) 4 SCC 427.

victim.

This study critically examines the Victim Compensation Scheme for acid attack survivors in India. It analyses the legal provisions, judicial decisions, practical implementation, and major challenges faced by survivors. The purpose is to understand whether the present compensation system truly helps survivors rebuild their lives or whether it remains only a formal legal promise.

II. CONCEPTUAL AND THEORETICAL FRAMEWORK

To understand victim compensation in acid attack cases, it is important to study the concept of victimology and restorative justice. Traditionally, criminal law focused mainly on the offender—how to punish them and maintain public order. Victims were often treated only as witnesses and not as people who needed justice and healing.

Victimology is the branch of criminology that studies victims, their suffering, and their relationship with the criminal justice system. It emphasizes that justice should not end with punishment of the accused; it should also include protection, compensation, and rehabilitation of the victim. In acid attack cases, victimology becomes highly relevant because the consequences are lifelong and deeply personal.

Earlier legal systems allowed victims to seek private revenge or personal compensation. Later, when the State took control of criminal justice, punishment became the main focus and victims were ignored. Modern human rights law has changed this approach by recognizing victim rights as an important part of justice. The United Nations Declaration of Basic Principles of Justice for Victims of Crime (1985) emphasized restitution, compensation, and assistance to victims. It recognized that victims deserve support, respect, and restoration of dignity.

Theories of punishment also help explain why compensation is necessary.

The retributive theory focuses on punishing the offender according to the seriousness of the crime. In acid attack cases, punishment is important but it cannot repair the victim's injuries or emotional suffering. The deterrent theory aims to prevent future crimes by imposing strict punishment. Severe punishment may discourage acid attacks, but it still does not help the victim recover.

The reformative theory focuses on changing the offender into a better person. While this may be socially useful, it again does not solve the victim's immediate suffering. This shows that punishment alone is not enough. Compensation is necessary because victims need treatment, rehabilitation, and support.

Restorative justice is a modern approach that focuses on repairing the harm caused by crime. It

aims to restore dignity, rebuild life, and support healing. In acid attack cases, complete restoration may be impossible, but financial compensation, counselling, medical care, and social support can reduce suffering and help survivors regain independence. Therefore, compensation is not only a legal remedy but also a moral and constitutional responsibility.

Victim compensation in acid attack cases has also been strengthened through constitutional principles and judicial intervention. The Article 21 of the Constitution of India guarantees the right to life with dignity, which includes access to medical care, rehabilitation, and a life free from inhuman treatment. Recognizing this, the Supreme Court of India in the landmark case of *Laxmi v. Union of India* directed both Central and State Governments to provide adequate compensation, free medical treatment, and regulate the sale of acid. These directions played a crucial role in shifting the focus from mere punishment to victim-centered justice, ensuring that survivors are not left to bear the consequences of the crime alone.

In addition, statutory provisions such as Section 357A of the Code of Criminal Procedure mandate the establishment of victim compensation schemes by State Governments. These schemes are particularly important in acid attack cases, where survivors require long-term medical treatment, reconstructive surgeries, psychological counselling, and social reintegration support. Compensation, therefore, acts as a bridge between legal justice and social justice by enabling victims to rebuild their lives. It reflects the evolving understanding that justice must be inclusive, addressing not only the wrongdoing of the offender but also the rights, needs, and dignity of the victim.

III. LEGAL FRAMEWORK IN INDIA

The legal response to acid attacks in India has improved significantly over time. Earlier, acid attacks were treated under general provisions of grievous hurt, which failed to reflect the seriousness of the offence.

The Criminal Law (Amendment) Act, 2013 introduced Sections 326A and 326B in the Indian Penal Code.⁴

Section 326A – Acid Attack

This section punishes anyone who causes permanent or partial damage, deformity, burns, disability, or disfigurement by using acid. The punishment is imprisonment of at least 10 years, which may extend to life imprisonment, along with fine.

The fine must be fair and should be used to cover the victim's medical expenses. This provision

⁴ Code of Criminal Procedure 1973, s 357A.

recognizes acid attacks as a separate and serious crime.

Section 326B – Attempt to Throw Acid

This section punishes attempts to throw acid even if no injury occurs. The punishment is imprisonment of at least 5 years.

This provision is preventive in nature and shows that even the intention to commit such a crime is treated seriously.

Section 357 CrPC

Section 357 allows courts to order compensation from the fine imposed on the offender. However, it depends on conviction and the financial ability of the accused. This makes it unreliable for serious crimes like acid attacks.⁵**Section 357A CrPC**

This section introduced the Victim Compensation Scheme and made it mandatory for states to provide compensation from public funds.

Its major advantages are:

- compensation is available even if the offender is unknown
- it is independent of conviction
- interim relief can be provided immediately

This reflects the principle that the State also has responsibility toward victims.

Constitutional Protection

Article 14 guarantees equality before law. Acid attack survivors must receive equal treatment and equal access to compensation across all states.

Article 21 protects the right to life and dignity. Courts have interpreted this to include the right to medical treatment, rehabilitation, and dignified living. Acid attacks directly violate these rights.

Regulation of Acid Sale

The Supreme Court directed strict regulation of acid sales by requiring:

- identity proof of buyers
- maintenance of records
- restrictions on sale to minors

⁵ Indian Penal Code 1860, ss 326A–326B.

- safe storage rules

However, weak enforcement still remains a major problem.

Overall, the legal framework is progressive, but implementation remains weak.

IV. VICTIM COMPENSATION SCHEME FOR ACID ATTACK SURVIVORS

Victim compensation is one of the most important parts of justice for acid attack survivors because punishment of the offender alone cannot restore the life of the victim. Acid attack survivors often suffer from severe burns, permanent disfigurement, blindness, disability, emotional trauma, and social rejection. They require immediate medical treatment, multiple surgeries, counselling, and long-term rehabilitation. These treatments are expensive and many victims come from financially weak backgrounds. Therefore, compensation becomes necessary not only for treatment but also for helping them rebuild their lives with dignity.

Section 357A of the Code of Criminal Procedure introduced the Victim Compensation Scheme and made it compulsory for every State Government to establish a scheme for providing financial assistance to victims of serious crimes, including acid attacks. This section reflects the idea that the State also has responsibility toward victims and compensation should not depend only on the offender's ability to pay. Even if the accused is not identified or convicted, the victim can still receive compensation from the State. This is an important shift from offender-based justice to victim-centered justice.

To ensure better implementation, the National Legal Services Authority (NALSA) introduced the Legal Services to Victims of Acid Attacks Scheme, 2016. This scheme aimed to create uniform standards across India and provide proper legal and financial support to survivors. The Supreme Court also directed that a minimum compensation of ₹3 lakh must be given to every acid attack survivor. Out of this, ₹1 lakh should be given as immediate relief within fifteen days of the incident and the remaining ₹2 lakh should be provided for medical treatment and rehabilitation. Some states have increased this amount depending on the seriousness of injuries, but in many cases the compensation still remains insufficient⁶The process of claiming compensation usually begins with the registration of an FIR, followed by an application before the District Legal Services Authority (DLSA). The survivor must submit medical records and other necessary documents. After verification and inquiry, the authority decides the amount of compensation and releases interim or final relief. Although the process appears simple in law, in practice survivors face many difficulties. Many are unaware of their rights, many struggle

⁶ Constitution of India 1950, art 21.

with complicated paperwork, and many face delays due to administrative inefficiency. Repeated visits to government offices create additional hardship for people already dealing with physical pain and trauma.

The DLSA and State Legal Services Authorities (SLSA) are responsible for implementing the compensation scheme, but lack of staff, poor coordination with hospitals, and weak monitoring systems reduce effectiveness. In many cases, hospitals refuse immediate treatment or demand payment despite legal directions. This defeats the purpose of urgent relief. Therefore, while the Victim Compensation Scheme is an important legal protection, its practical success depends on proper implementation and a humane administrative approach.

V. JUDICIAL APPROACH

The Indian judiciary has played a very important role in strengthening the rights of acid attack survivors and improving the victim compensation framework. Courts have repeatedly emphasized that justice is not limited to punishing the offender; it must also include the rehabilitation and restoration of the victim. Since acid attacks cause permanent physical and emotional damage, judicial intervention has been necessary to ensure that survivors receive proper medical treatment, compensation, and social support.

The most significant case in this area is *Laxmi v. Union of India*. This case became a turning point in Indian legal history regarding acid attacks. The petitioner, Laxmi, herself an acid attack survivor, approached the Supreme Court seeking stricter regulation of acid sales and better protection for victims. The Court recognized the seriousness of acid violence and issued several important directions. It ordered strict regulation of acid sale by requiring sellers to maintain records of buyers, verify identity proof, and restrict sale to minors. It also directed all states to provide a minimum compensation of ₹3 lakh to acid attack survivors and ensure free medical treatment in both government and private hospitals. This judgment transformed acid attack law and made victim compensation a matter of legal obligation rather than charity.

Another important case is *Parivartan Kendra v. Union of India*, where the Supreme Court focused on long-term rehabilitation of survivors.

The Court observed that compensation must be realistic and sufficient to cover treatment and future needs. It directed governments to provide not only financial assistance but also education, employment opportunities, and social rehabilitation. The Court made it clear that rehabilitation is as important as medical care because survivors often lose their ability to work and face social exclusion. The judiciary has also interpreted Article 21 of the Constitution,

which protects the right to life and personal liberty, to include the right to live with dignity. Acid attack survivors have the right to medical care, psychological counselling, vocational training, and a dignified life. Courts have recognized that without proper rehabilitation, compensation loses its real purpose. This reflects the principle of restorative justice, where the focus is on repairing harm and helping victims regain independence.

However, even strong judicial directions face limitations. Courts can issue orders, but implementation depends on the executive authorities. Many hospitals still refuse immediate treatment, compensation is delayed, and survivors continue to struggle with bureaucratic obstacles. Thus, while judicial activism has greatly improved legal protection, the gap between legal orders and ground-level reality still remains a major concern.

To bridge this gap, there is a pressing need for stronger institutional accountability and effective implementation mechanisms. Authorities must ensure strict enforcement of judicial guidelines laid down by the Supreme Court of India in cases such as *Laxmi v. Union of India*, including timely disbursement of compensation and mandatory free medical treatment in both public and private hospitals. Regular monitoring, awareness among officials, and sensitization of healthcare providers are essential to ensure that survivors are treated with dignity and urgency. Additionally, coordination between legal services authorities, healthcare institutions, and social welfare departments can help create a more responsive support system. Without such systemic reforms, the promise of restorative justice will remain incomplete, and survivors will continue to face hardships despite progressive legal recognition.

VI. INTERNATIONAL PERSPECTIVE

Acid attacks are not limited to India; they are a global problem affecting many countries. Studying international legal systems helps in understanding better methods of prevention, punishment, and victim rehabilitation. Different countries have adopted different approaches to victim compensation, and comparing them provides useful lessons for improving the Indian system.

In the United Kingdom, compensation for victims of violent crimes is provided through the Criminal Injuries Compensation Authority (CICA). This is a state-funded system that gives financial support to victims who suffer physical or psychological injuries due to criminal acts. The compensation is provided through a fixed tariff system, which ensures transparency and uniformity. Victims of acid attacks can receive compensation for burns, permanent disfigurement, mental trauma, and even loss of earnings. The system is considered effective because it does not depend entirely on the conviction of the offender and follows a clear and

structured procedure.

Bangladesh is often considered one of the strongest examples in dealing with acid attacks. It introduced the Acid Crime Control Act, 2002 and the Acid Control Act, 2002. These laws provide strict punishment, including severe imprisonment and strong control over the production, transport, and sale of acid. Bangladesh also established special tribunals for speedy trial of acid attack cases and created a dedicated compensation and rehabilitation fund for survivors. The combination of strict punishment and victim support has made Bangladesh a significant model for other countries.

In the United States, victim compensation is managed mainly by individual states rather than the central government. Each state has its own victim compensation program, which generally covers medical expenses, counselling, lost wages, and rehabilitation support. While this provides important relief, the system often varies from one state to another, and strict procedural requirements may make access difficult. Some victims may also face problems if they cannot meet reporting deadlines or documentation requirements.

From these international models, India can learn several valuable lessons. There is a need for uniform compensation standards across all states so that victims are treated equally regardless of location. A dedicated rehabilitation fund specifically for acid attack survivors can improve long-term support. Stronger regulation of acid sale, better hospital coordination, and faster compensation procedures are also necessary. Most importantly, compensation should focus not only on immediate medical expenses but also on education, employment, and psychological recovery. International experience shows that successful victim compensation must be accessible, practical, and rehabilitation-oriented.

VII. CHALLENGES AND CRITICAL ANALYSIS

Although India has introduced strong laws and judicial protections for acid attack survivors, many serious challenges still exist in practice.

The gap between legal provisions and actual implementation remains one of the biggest problems. Survivors often continue to suffer because compensation and rehabilitation are delayed, insufficient, or inaccessible. One major problem is the delay in granting compensation. Acid attack survivors need immediate financial support because emergency medical treatment, surgeries, and hospitalization are expensive. However, many victims wait for months or even years before receiving compensation. Delays occur due to slow verification processes, administrative inefficiency, lack of coordination between hospitals and legal services authorities, and shortage of funds. This delay defeats the purpose of interim relief and increases

the suffering of survivors.

Another serious issue is the inadequacy of compensation. The minimum amount of ₹3 lakh directed by the Supreme Court is often too small compared to the actual cost of treatment. Survivors may require multiple surgeries, skin grafting, eye treatment, reconstructive procedures, counselling, and lifelong medication. Many also lose employment opportunities because of permanent disability or social discrimination. In such cases, compensation should be based on the real extent of harm rather than a fixed minimum amount. When compensation is too low, it becomes symbolic rather than restorative.

Lack of awareness is another major obstacle. Many survivors, especially in rural areas, do not know that they have a legal right to compensation. They may not know where to apply, what documents are required, or how the process works. Illiteracy, poverty, and social dependence make the situation worse. Without proper legal awareness and support, many victims never receive the benefits that the law promises.

Social stigma also creates deep suffering. Acid attack survivors often face rejection from family, society, and workplaces. Their physical appearance changes permanently, which affects confidence and mental health. Many suffer from depression, anxiety, and isolation. Marriage prospects are affected, employment becomes difficult, and daily social interaction becomes painful. Financial compensation alone cannot remove this emotional and social burden. Rehabilitation must therefore include counselling, education, and social acceptance programs.

Institutional weakness further reduces the effectiveness of the compensation scheme. District Legal Services Authorities are often understaffed and lack trained personnel. Hospitals may refuse treatment or fail to coordinate with legal authorities. Monitoring mechanisms are weak, and there is little accountability for delay or negligence. This creates a situation where the law appears strong on paper but fails in practical application.

A critical analysis shows that India has made important progress by recognizing victim rights, creating statutory compensation schemes, and strengthening judicial protection. However, the system still suffers from poor implementation, low compensation amounts, and lack of holistic rehabilitation. True justice requires not only punishment of the offender but also complete support for the survivor. Until compensation becomes timely, sufficient, and survivor-focused, justice will remain incomplete.

Moreover, addressing these shortcomings requires a shift from a purely formal legal framework to a survivor-centric approach that prioritizes long-term rehabilitation and social reintegration. Compensation policies must be revised to reflect the actual cost of multiple surgeries, ongoing

medical care, loss of livelihood, and psychological trauma faced by survivors. The role of institutions like the National Legal Services Authority is crucial in ensuring that victims are aware of and able to access compensation schemes without procedural delays. In addition, greater collaboration between government agencies, non-governmental organizations, and healthcare providers can help create a comprehensive support system that goes beyond financial aid to include education, employment opportunities, and community acceptance. Only through such an integrated and empathetic approach can the justice system truly uphold the dignity and rights of acid attack survivors.

A comprehensive reform must also include structured awareness campaigns at the grassroots level, especially in rural and marginalized communities, where access to legal information remains limited. Legal literacy programs conducted through schools, panchayats, and community centers can play a significant role in informing victims about their rights and available remedies. The National Legal Services Authority and State Legal Services Authorities should take proactive steps to simplify application procedures, provide legal aid, and ensure that victims are guided at every stage of the compensation process. Digital platforms can also be utilized to make applications more accessible, transparent, and time-bound, thereby reducing bureaucratic delays and increasing accountability.

Furthermore, long-term rehabilitation must be institutionalized as a core component of victim compensation rather than treated as an optional welfare measure. This includes guaranteed access to free and quality medical treatment, reconstructive surgeries, mental health support, skill development, and employment opportunities. Public and private sector participation should be encouraged to create inclusive workplaces for survivors, reducing stigma and promoting social acceptance. Judicial directions issued by the Supreme Court of India in cases like *Laxmi v. Union of India* must be strictly implemented with regular monitoring and penalties for non-compliance. Ultimately, only when the legal system moves beyond symbolic recognition and ensures real, measurable support in the lives of survivors can it be said that justice has been meaningfully achieved.

In addition, there is a need to adopt a rights-based and trauma-informed approach in dealing with acid attack survivors, ensuring that all state responses are sensitive to their physical and psychological condition. Law enforcement officials, medical staff, and administrative authorities must be properly trained to handle such cases with empathy, urgency, and professionalism. Dedicated support cells at the district level can help coordinate between hospitals, police, and legal services, reducing the burden on survivors to navigate complex systems on their own. Strengthening oversight by bodies like the National Human Rights

Commission can further enhance accountability and ensure that failures in providing compensation or treatment are promptly addressed.

VIII. SUGGESTIONS AND CONCLUSION

The study of victim compensation for acid attack survivors shows that India has made significant legal progress, but serious reforms are still needed to make the system truly effective. Laws such as Sections 326A and 326B of the Indian Penal Code, Section 357A of the Code of Criminal Procedure, and important Supreme Court judgments have created a strong legal foundation. However, the practical implementation of these protections remains weak, and survivors continue to face hardship in accessing justice. One of the most important reforms required is the creation of a uniform national compensation scheme. At present, compensation policies vary from one state to another, which creates inequality among victims. A survivor in one state may receive better support than a survivor in another state for the same level of injury. This violates the principle of equality under Article 14 of the Constitution. A standard national policy with clear rules and fixed timelines would ensure fairness and consistency.

The compensation amount must also be increased. The minimum amount of ₹3 lakh is often not enough to cover surgeries, long-term treatment, counselling, and livelihood restoration. Compensation should be based on the seriousness of injuries, degree of permanent disability, and future rehabilitation needs. A realistic and flexible approach is necessary so that compensation serves as true restoration rather than temporary relief.

Medical and psychological support must be made stronger. Survivors should receive immediate and free treatment in both government and private hospitals without delay. Multiple reconstructive surgeries, counselling sessions, and rehabilitation services should be guaranteed as a legal right. Hospitals that refuse treatment should face strict legal consequences. Psychological counselling is equally important because emotional trauma often lasts longer than physical injuries.

Institutional strengthening is also necessary. District Legal Services Authorities and State Legal Services Authorities need better funding, trained officers, and stronger coordination with hospitals, police, and welfare departments. Victim support centres should be created to help survivors with documentation, counselling, and rehabilitation. Faster administrative action and strict accountability for delays are essential.

Awareness programs must be promoted through government agencies, educational institutions, and non-governmental organizations.

Survivors should know their rights and the procedure for claiming compensation. Public awareness can also reduce social stigma and encourage social acceptance of survivors.

Strict regulation of acid sale must be enforced seriously. Although the Supreme Court has issued directions, illegal sale of acid still continues in many places. Regular inspections, licensing systems, and strong punishment for violations are necessary to prevent future attacks.

In conclusion, acid attacks are not ordinary crimes; they are attacks on dignity, identity, and human existence. Survivors face lifelong suffering that goes beyond physical injury. Justice cannot be achieved by punishment alone. It must include proper compensation, rehabilitation, emotional support, and restoration of dignity.

Compensation should not be treated as charity but as a constitutional and human right. A stronger, faster, and more compassionate victim compensation system is necessary to ensure that acid attack survivors are able to rebuild their lives with confidence and respect. Only then can the legal system truly deliver complete justice.

IX. REFERENCE

- [1] Dr. K.I. Vibhute, *Criminal Law and Victimology*, Eastern Book Company.
- [2] Ratanlal & Dhirajlal, *The Indian Penal Code*, LexisNexis.
- [3] Kelkar, R.V., *Criminal Procedure Code*, Eastern Book Company.
- [4] P.S.A. Pillai, *Criminal Law*, LexisNexis Butterworths.
- [5] Dr. S.R. Myneni, *Criminal Law and Criminology*, Allahabad Law Agency.
- [6] Prof. N.V. Paranjape, *Criminology and Penology with Victimology*, Central Law Publications.
- [7] Justice V.R. Krishna Iyer, *Human Rights and Inhuman Wrongs*, B.R. Publishing Corporation.