



VICTIM COMPENSATION IN THE CRIMINAL JUDICIAL SYSTEM IN INDIA

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ABSTRACT

Victim compensation is an important component of India's criminal judicial system, and the state must monetarily compensate the victims of criminal activity. The Central Victim Compensation Fund (CVCF) and State Victim Compensation Schemes (SVCS) reflect the state's concern for the victims. Compensation is state-specific, depending on the nature of the crime, the socio-economic status of the victim, and the effect on his/her life. The Bharatiya Nagarik Suraksha Sanhita (BNSS) 2023 added new provisions to improve victim compensation, instructing state governments to draw up schemes offering money to victims or their dependents. Such schemes involve immediate free medical or first-aid care and a provision to seek compensation schemes with the State or District Legal Service Authority.

There is an urgent need for reforms to strengthen the victim compensation system, such as streamlined procedures, speedy disbursements, greater awareness of victim rights, and a standardised scheme at the state level. These reforms have the potential to significantly enhance the efficiency of victim compensation in India, making the state's role in victim rehabilitation stronger.

Keywords: Victim Compensation, Financial Reparation, Awareness, BNSS.

I. INTRODUCTION

Victim compensation is a crucial component of the criminal judicial system, offering pecuniary restitution for the losses occasioned by crimes. The provision of victim compensation underscores the state's obligation to care for and assist victims toward recovery, ensuring that justice extends beyond punishing offenders to prioritising restoration and rehabilitation. Victim compensation serves several vital purposes within the criminal judicial system: it acknowledges the harm suffered by victims, provides a form of restitution, and aids in the recovery process. By addressing the needs of victims, the criminal judicial system can promote a sense of justice and healing, ultimately enhancing the overall efficacy of the legal process.

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In the Indian context, a legislative provision for the victim compensation framework exists as provided by the Code of Criminal Procedure 1973. According to the framework, the court can also give a decree to seek compensation for victims against an offender. Moreover, the Central Victim Compensation Fund (CVCF)² and State Victim Compensation Schemes (SVCS) have been established to compensate the victim further. Recent legislative development: The recent introduction of provisions within the Bharatiya Nagarik Suraksha Sanhita (BNSS) 2023³ strengthens the victim compensation scheme by compelling the state governments to formulate schemes to raise funds to distribute to victims or their families.

Victim compensation is much more than monetary reparation. It also helps to revive the dignity and well-being of the victim. The compensations for such costs as medical charges, lawyers, and income lost due to victimisation are given back to the victim to reestablish life in normal conditions. In this manner, the law deters crime perpetrators, reinforcing the thought that criminal behaviour leads to a consequence. By compensating the victim, the criminal judicial system gives justice that is not only retributive but restorative as well, fulfilling the needs of victims and bringing in a sense of justice and healing.

This research paper is dedicated to examining the efficiency of victim compensation in India. The analysis focuses on the legal framework, process, and mechanism for determining and disbursing compensation, aiming to identify the bottlenecks associated with the scheme, such as delays in compensation, lack of awareness among victims, and inconsistent application of laws between jurisdictions. The paper attempts to comprehensively evaluate the current state of victim compensation in India, outlining areas for improvement and recommending measures to enhance the system's effectiveness. In doing this, the paper strives to promote the development of a more victim-centred judicial approach that recognises the profound impact crime has on individuals and addresses justice and healing.

The paper carries out research under a scope as comprehensive as providing an in-depth exploration of victim compensation in its geographical, historical, and legal context in India.

Further, the paper will explore the variations in victim compensation schemes across different states, identifying the factors that influence the determination and disbursement of compensation. Understanding these regional differences is crucial for analysing the overall effectiveness of victim compensation in India. The geographical scope also includes examining the role of state-level authorities and the impact of regional policies on the implementation of victim compensation schemes.

The paper also traces the evolution of victim compensation in India, including legislative developments and policy changes that have shaped the current framework. The historical perspective would give insights into how victim compensation has evolved and what factors have influenced its development. The historical scope also includes the analysis of landmark cases and legal precedents that have contributed to advancing victim compensation in India.

The paper analyses the provisions of the CrPC 1973⁴, the CVCF⁵, the SVCS⁶, and the BNSS 2023⁷, highlighting their significance and impact on victim compensation. Special emphasis will be given to recent legislative developments, such as the BNSS 2023⁸, which has introduced new provisions to enhance victim compensation. The legal scope also includes relevant case laws, judicial interpretations, and the role of various legal institutions in implementing victim compensation schemes.

By including these contexts, the paper aims to comprehensively understand the complexities and challenges associated with victim compensation in India. Such an approach will now allow for a deep, overall analysis of the current system's effectiveness and for identifying areas where reform could be necessary. In so doing,

² Government of India, Ministry of Home Affairs, Central Victim Compensation Fund (CVCF) Guidelines, October 14, 2015, https://www.mha.gov.in/sites/default/files/CVCFGuidelines_14101

³ Bharatiya Nagarik Suraksha Sanhita, No. 46 of 2023, Acts of Parliament, 2023 (India).

⁴ The Code of Criminal Procedure, No. 2 of 1974, Acts of Parliament, 1973 (India).

⁵ *Id.*

⁶ *Id.*

⁷ Bharatiya Nagarik Suraksha Sanhita, No. 46 of 2023, Acts of Parliament, 2023 (India).

⁸ *Id.*

the paper hopes to contribute to the development of an even stronger and more effective framework for victim compensation that is more responsive to victims' needs and helps them in their efforts to recover.

II. FINDINGS

Various statutory provisions govern victim compensation in India to provide financial reparations to individuals who have suffered harm due to criminal activities. The Code of Criminal Procedure (CrPC) 1973 forms the cornerstone of the victim compensation framework. Sections 357, 357A, and 357B of the CrPC empower courts to order offenders to compensate victims. Section 357⁹ empowers the courts to direct that part of the fine levied on the offender be given to the victim. Section 357A empowers the state governments to compensate the victims or their dependents in cases where the offender could not be traced or identified. Thus, the compensation could not be recovered from them. Section 357B¹⁰ provides that compensation awarded under the Motor Vehicles Act, 1988 shall be in addition to the compensation received under other laws. Constitutional provisions, specifically Articles 14 and 21, also provide for the right to compensation. Article 14¹¹ provides for equality before the law, and Article 21¹² guarantees the right to life and personal liberty, which includes the right to compensation. Some other relevant laws include the Protection of Women from Domestic Violence Act 2005¹³, the Sexual Harassment (Prevention, Protection and Redress) Act 2013¹⁴, and the Fatal Accidents Act 1855.

Judicial Pronouncements

The judiciary has significantly shaped the landscape of victim compensation in India through various landmark judgments. The Supreme Court held the state liable to pay compensation for the violation of fundamental rights in *Nilabati Behra v. State of Orissa* in 1993¹⁵, reinforcing the state's responsibility towards victims through the ways of empowering the basic right and no longer escaping the liability in public law by this Supreme Court judgment, while in the case of *Rudal Sah v. State of Bihar*¹⁶, compensation was awarded for wrongful imprisonment, leaving an indication of acknowledgement by the court for the suffering of victims.

The *Bhim Singh v. State of Jammu & Kashmir* case¹⁷, where compensation was awarded for the wrongful arrest of an MLA, further bolstered the judiciary's commitment to the victims' right to justice. The judgment of the Supreme Court of India not only condemned the arbitrary actions of the police but also granted exemplary compensation to Singh, which proves that the state and its officials are answerable for their acts.

The case of *Ankush Shivaji Gaikwad v. State of Maharashtra* (2013)¹⁸ is a landmark in the Indian legal system regarding victim compensation. The Supreme Court upheld the life sentence of the accused while emphasising the critical need for victim compensation as part of the criminal justice process. In this case, the court ruled that the victim's family be given appropriate compensation. This was done by the court, which underlined the significant loss and trauma caused. The judgment emphasised the importance of acknowledging and addressing the rights and needs of victims in the sense that justice should both punish and restore.

The court, in the *SAHELI v. Commissioner of Police* case¹⁹, awarded compensation for custodial death, underlining the accountability of the state in cases of human rights violations. The judgment has also created an important precedent, establishing and clarifying that the state cannot evade liability for the unlawful acts

⁹ The Code of Criminal Procedure, 1973, s. 357, No. 2 of 1974, Acts of Parliament, 1973 (India).

¹⁰ The Code of Criminal Procedure, 1973, s. 357B, No. 2 of 1974, Acts of Parliament, 1973 (India).

¹¹ INDIA CONST. art. 14.

¹² INDIA CONST. art. 21.

¹³ Protection of Women from Domestic Violence Act, No. 43 of 2005, Acts of Parliament, 2005 (India).

¹⁴ Sexual Harassment (Prevention, Protection and Redress) Act, No. 14 of 2013, Acts of Parliament, 2013 (India).

¹⁵ *Nilabati Behra v. State of Orissa*, 1993 AIR 1960 (India).

¹⁶ *Rudal Sah v. State of Bihar*, 1983 AIR 1086 (India).

¹⁷ *Bhim Singh v. State of J&K*, 1986 AIR 494 (India).

¹⁸ *Ankush Shivaji Gaikwad v. State of Maharashtra*, 2013 AIR 2454 (India).

¹⁹ *SAHELI v. Commissioner of Police*, 1990 AIR 513 (India).

committed by officials. It emphasised the protection of human rights and the dispensation of justice to the victims of state excesses. The judgment also paved the way for more effective mechanisms to address and prevent custodial violence against victims, as well as appropriate compensation and support for the victims' families. These judicial pronouncements have significantly impacted the victim compensation framework, ensuring victims are recognised and repared for the harm suffered²⁰.

Policy Measures

Policy measures have been implemented to enhance the effectiveness of victim compensation schemes in India. The Central Victim Compensation Fund²¹ (CVCF) and various State Victim Compensation Schemes (SVCS) have been established to support victims financially. In 2022, the Ministry of Home Affairs undertook measures to standardise the compensation of victims across states to deal with the unevenness in schemes. Each state has framed a different scheme, such as the Madhya Pradesh and other states and Union Territories Victim Compensation Scheme, explicitly designed to cater to the needs of victims in a particular state²². Despite all these efforts, the problems persist, including delays in compensation disbursement, lack of awareness among victims, and inconsistencies in applying laws. The recent legislative development is the Bharatiya Nagarik Suraksha Sanhita (BNSS) 2023, which has brought new provisions to strengthen the victim compensation framework. Section 396 of BNSS²³ lists the mandatory duty of the State government to prepare schemes for providing funds for compensation to victims or their dependents, including immediate first aid or medical benefits at no cost. The facility for filing compensation applications before the State or District Legal Service Authority is also a significant addition under BNSS²⁴.

Through these legal provisions, judicial interpretations, and policy initiatives, India is endeavouring to establish a judicial system that prioritises the needs of victims. This system aims to recognise the profound impact of crimes on individuals and facilitate their journey towards justice and healing. While significant progress has been achieved in the victim compensation scheme, several challenges must be addressed to enhance the system's effectiveness.

III. DISCUSSION

Implementation Challenges

The implementation of victim compensation schemes in India is fraught with numerous challenges. One of the most significant issues is bureaucratic delays. The process of obtaining compensation can be lengthy and cumbersome, often requiring victims to navigate a complex web of paperwork and legal procedures. This delay can be particularly detrimental to victims who are in urgent need of financial support for medical treatment, rehabilitation, or basic living expenses. Moreover, the lack of a streamlined process exacerbates these delays, making it difficult for victims to access timely compensation²⁵.

Another critical challenge is the lack of awareness among victims about their rights and the availability of compensation schemes. Many victims are unaware that they are entitled to compensation under the law, and even when they are aware, they may not know how to claim it. This lack of awareness is often compounded by a lack of legal literacy and support, leaving victims vulnerable and without recourse. Additionally, there is a significant inadequate funding issue, with compensation amounts varying significantly between states and

²⁰ Dr. Justice G.Jayachandran National Judicial Academy, Victim Compensation Scheme - Session V (2022-2023), https://www.nja.gov.in/Concluded_Programmes/2022-23/P-1341_PPTs/3.Victim%20compensation%20scheme%20Session%20V.pdf.

²¹ *Id.*

²² Press Release, Ministry of Information and Broadcasting, <https://pib.gov.in/PressReleaseIframePage.aspx?PRID=1812410> (last visited Feb. 11, 2025).

²³ Bharatiya Nagarik Suraksha Sanhita, 2023, s. 396, No. 46 of 2023, Acts of Parliament, 2023 (India).

²⁴ *Id.*

²⁵ Vibha Mohan, REVISITING VICTIM COMPENSATION IN INDIA, https://docs.manupatra.in/newsline/articles/Upload/6F5E12E5-2A56-49A9-BF1B-CBE1DF4F8726.2-F_criminal.pdf (last visited Feb. 11, 2025).

often falling short of covering the actual costs victims incur. This financial disparity can leave victims struggling to cover essential expenses such as medical bills, lost wages, and other costs related to their recovery²⁶.

While the courts have the power to grant compensation, in case of a general absence of guidelines, arbitrary and inconsistent awards from the courts might be expected. Social stigma does not allow the victims, especially in cases like sexual assault, to come and claim compensation. Proper training and capacity building for officials involved in such schemes are also lacking, hindering the whole process. All these problems need to be addressed with a multi-pronged approach: raising awareness, streamlining the administrative process, adequate funding, coordination, clear judicial guidelines, reducing social stigma, and proper training for officials²⁷.

Comparative Analysis

Comparing India's victim compensation mechanisms with those of other countries reveals both strengths and areas for improvement. In the United States, the Victim Compensation Fund provides financial assistance to victims of crime, funded by fines and penalties paid by offenders. The fund covers various expenses, including medical costs, lost wages, and funeral expenses. The fund focuses on providing victims with immediate and substantial financial support, ensuring they receive the necessary assistance promptly.

The Criminal Injuries Compensation Authority (CICA) of the United Kingdom helps victims of violent crimes by providing a direct compensation scheme that has been made legally prominent and transparent. The CICA, created through the provisions of the Criminal Injuries Compensation Act 1995, operates on the idea that it is a part of the justice system to compensate victims of acts of violence with damages for their physical as well as emotional pain and any financial loss suffered. It does this with a keenly aware understanding of the gravitas of the injury sustained by the victim, the magnitude of interruption to their life, and any other elements in the equation, such as loss of earnings or medical expenses²⁸. The CICA guarantees that victims of violent crimes obtain fair and decent compensation under a clear, structured, and efficient process, whereby the severity of suffering is well reflected and helps in recovery²⁹.

The victim compensation schemes in India face multiple challenges primarily because of the lack of uniformity and transparency across various states. Every state in India has its own rules and criteria for awarding compensation to crime victims; hence, the amount disbursed and the eligibility criteria vary considerably. This has resulted in a fragmented system, where victims in one state are receiving different levels of support than those in another, creating disparities and inequities in the aid provided to victims³⁰.

Such complications are mainly attributed to a lack of system coordination in processing the claims for compensation. Victims typically find themselves amidst red tape: the multiple and diverse agencies and departments dealing with them could delay the procedure and cause inconsistencies with funds disbursement. Lack of coordination among all those agencies even adds more complicating factors; victims cannot gain prompt and enough compensation³¹.

The bureaucratic hurdles and procedural delays discourage many victims from claiming their rightful compensation. The lengthy and cumbersome application process, coupled with the requirement for extensive

²⁶ Lack of Awareness Hits Victim Compensatory Scheme, Hindustan Times, <https://www.hindustantimes.com/punjab/lack-of-awareness-hits-victim-compensatory-scheme/story-GYGrjWsWMNd0Nz2BfHcGXX.html> (last visited Feb. 11, 2025).

²⁷ M. Sarojanamma, IV Additional Civil Judge (Junior Division), Kurnool, VICTIMOLOGY & COMPENSATION, <https://cdnbbsr.s3waas.gov.in/s3ec030b6ace9e8971cf36f1782aa982a7/uploads/2024/12/2024121046.pdf>, (last visited Feb. 11, 2025).

²⁸ Criminal Injuries Compensation Scheme Review 2020, Ministry of Justice, <https://assets.publishing.service.gov.uk/media/5f101937d3bf7f03a773b6be/cics-review-2020.pdf> (last visited Feb. 11, 2025).

²⁹ Criminal Injuries Compensation Authority, GOV.UK, <https://www.gov.uk/government/organisations/criminal-injuries-compensation-authority> (last visited Feb. 11, 2025).

³⁰ Rajesh Mahajan, Victim Compensation Laws in India, Chambers and Partners, <https://chambers.com/articles/victim-compensation-laws-in-india> (last visited Feb. 11, 2025).

³¹ Dube, D., 2018. Victim compensation schemes in India: An analysis. *International Journal of Criminal Justice Sciences*, 13(2).

documentation, can be overwhelming for victims already dealing with the trauma of the crime. This deters many from applying for compensation, thus creating a considerable gap between those eligible for support and those who receive it³².

Creating a more standardised and centralised victim compensation system in India is essential. This would include standardising eligibility criteria and compensation amounts across states to eliminate disparities in victim compensation and ensure that victims receive fair and adequate support. It would also involve streamlining administrative processes and improving coordination among agencies to facilitate quicker disbursement of funds and greater accessibility for victims. Furthermore, making public more information concerning compensation schemes can be helpful; additionally, improving the application procedures for compensation support may encourage most victims to avail themselves of it.

IV. RECOMMENDATIONS

To improve the effectiveness and efficiency of victim compensation in India, several recommendations can be made:

Streamline Bureaucratic Processes: Simplifying the application process and reducing bureaucratic red tape can help expedite the disbursement of compensation to victims. This could involve creating a centralised online portal for submitting claims and tracking their status. Ensuring the process is user-friendly and accessible can significantly reduce delays and improve the overall experience for victims³³.

Increase Awareness: Conducting awareness campaigns to educate victims about their rights and the availability of compensation schemes is crucial. Collaboration with NGOs, community organisations, and media outlets can help disseminate information widely, ensuring that victims know their entitlements and how to claim compensation. Additionally, legal aid services should be made readily available to assist victims in navigating the compensation process.

Enhance Funding: Increasing the funding allocated to victim compensation schemes can ensure that victims receive adequate financial support. Revising budgetary allocations for these schemes and exploring alternative funding sources, such as fines and penalties from offenders, can help address the issue of inadequate funding. Additionally, ensuring that funds are distributed equitably across states can help mitigate disparities in compensation amounts³⁴.

Standardise Compensation Schemes: Implementing uniform compensation schemes across all states can help address the disparities in compensation amounts and eligibility criteria. Developing a national framework for victim compensation, with guidelines for determining compensation amounts based on the severity of the crime and the impact on the victim, can ensure consistency and fairness in the support provided to victims³⁵.

Strengthen Judicial Pronouncements: Encouraging the judiciary to issue more consistent and robust judgments in favour of victims can help reinforce the importance of victim compensation. Landmark cases such as *Nilabati Behra v. State of Orissa (1993)*³⁶, where the Supreme Court held the state liable to pay compensation for the violation of fundamental rights, and *Rudal Sah v. State of Bihar (1983)*³⁷, where compensation was awarded for wrongful imprisonment, highlight the judiciary's role in shaping

³² Mahanta, S. and Devi, M., 2023. Revisiting Indian Victim Compensation Law: Need For An Independent Victim Law. *Journal of Namibian Studies: History Politics Culture*, 33, pp.4201-4229.

³³ Muzaffar, A., 2022. A critical analysis on criminal justice system and victim; compensation and restitution of victim. <http://103.85.141.226:8071/jspui/bitstream/123456789/917/1/AMNA%20MUJZAFFER.pdf>

³⁴ Srivastava, N., 2023. A Critical Evaluation of Victim Compensation Scheme in India: Past, Present and Future Insights. *Jus Corpus LJ*, 4, p.504. https://heinonline.org/hol/cgi-bin/get_pdf.cgi?handle=hein.journals/juscrp4§ion=220

³⁵ Nath, D.G., 2020. Victim Compensation: Understanding the Law to Sensitize Stakeholders. Available at SSRN 3635598. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3635598

³⁶ *Nilabati Behra v. State of Orissa*, 1993 AIR 1960 (India).

³⁷ *Rudal Sah v. State of Bihar*, 1983 AIR 1086 (India).

the victim compensation landscape. Building on these precedents, the judiciary can continue to advocate for victims' rights and ensure they receive the compensation they deserve.

India can strengthen its legal system by addressing issues, putting suggestions into practice, concentrating on victims, and promoting justice. The victim compensation framework must be regularly evaluated and improved to meet their needs and aid in their recovery. This will strengthen the state's commitment to justice and improve the efficacy of the criminal justice system.

V. CONCLUSION

Analysis of victim compensation in India's criminal judicial system reveals some critical findings with significant implications for improving support for victims. Statutory provisions such as the Code of Criminal Procedure (CrPC) 1973 and the recent legislation of Bharatiya Nagarik Suraksha Sanhita (BNSS) 2023 lay down the legal framework for victim compensation, reiterating the state's liability towards victims. Landmark judicial pronouncements such as *Nilabati Behra v. State of Orissa* (1993) and *Rudal Sah v. State of Bihar* (1983) have emphasised the state's accountability and compensation to the victims whose rights have been violated.

Bureaucratic delays, lack of victim awareness, and inadequate funding hinder the implementation of victim compensation provisions in India. Comparative analysis with countries like the United States and the United Kingdom highlights the need for a more standardised and transparent approach. Proposals include streamlining bureaucratic processes, building awareness about victims' rights, enhancing compensation schemes' funding, and standardising compensation amounts and eligibility criteria.

Future research focuses on assessing legislative developments' effectiveness, identifying regional disparities in victim compensation schemes, and learning from successful models and innovative approaches from other jurisdictions. India has made significant progress in establishing a legal framework to compensate victims, but ongoing challenges must be addressed to make the overall system more effective. Through research and reforms, India can develop a stronger, more victim-centric judicial system that honestly answers victims' needs for their recovery.



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