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## JUVENILE JUSTICE SYSTEM ACROSS DIFFERENT COUNTRIES

### I. Introduction

Over the past few decades, there has been a global increase in the number of juvenile-perpetrated crimes, as reported in numerous case studies and newspaper articles. A juvenile is a child or minor who is not regarded as an adult; in simpler terms, a juvenile is someone who has not reached the age of majority. It has been noted that the number of crimes committed by children between the ages of 12 and 16 has significantly grown for a variety of reasons, including poor schooling, unfavorable living circumstances, poverty, peer pressure from impoverished families, traumatic life experiences, and poor mental health. Juvenile delinquency is the phrase used to describe a crime committed by a juvenile. The fact that children between the ages of 6 and 16 are compelled into participating in criminal activities and breaking the law is concerning and deplorable. The children steal, commit thefts, rob, and sell illegal products in along with consuming and selling drugs. Children can be seduced at a low cost because of their insensitive and deceitful minds. The purpose of this article is to examine juvenile justice systems around the world, highlighting significant differences and shared difficulties.

### II. Juvenile Justice in Developed Countries

#### A. UNITED STATES

The United States has a complex history of juvenile justice, evolving over time to focus more on rehabilitation than punishment. The United States Constitution binds the states and local governments under the jurisdiction of the federal system, which includes the police, which is responsible for supervising juvenile justice in the country. In the United States, everyone under the age of eighteen is regarded as a juvenile. The authorities will decide whether to place the young offender in detention or to warn them for their actions. Additionally, police have the authority to do both. Following the juvenile's court trial, he

or she is placed in authorized schools, children's homes, or juvenile rehabilitation centers in an effort to give them a better life and help them with their behavior.

## **B. UNITED KINGDOM**

The United Kingdom established juvenile courts in 1908. Under the Children Act of 1908, these courts were aimed at upholding the rights of juvenile offenders and ensuring their welfare by giving them the necessary care and education. Under the Children and Young Offenders Act of 1933, juvenile offenders were tried in juvenile courts. The Criminal Justice Act of 1948 established security in remand homes and sent juvenile criminals to training for rehabilitation.

## **C. CANADA**

The Youth Criminal Justice Act, which places a high priority on the rehabilitation and reintegration of young offenders, and restorative justice techniques are two aspects of Canada's juvenile justice system. Canada's strategy emphasizes community safety and the child's best interests over those of other developed nations. When minors engage in illegal activity, certain factors need to be taken into account. It is applicable to minors who are in legal problems between the ages of 12 and 17. Though not to the same or greater level as adults, the YCJA acknowledges that juvenile offenders must be held accountable for their actions.

# **III. Juvenile Justice in Developing Countries**

## **A. INDIA**

In 2000, the Juvenile Justice (Care and Protection for Children) Act was introduced with the aim of offering care and safeguarding to young offenders in the country. A person who commits a crime in India before the age of eighteen is considered a juvenile. This Act had two amendments in 2006 and then again in 2011. But in 2015, following the Nirbhaya Case—in which a juvenile, who would turn eighteen in six months, was charged with rape—law amendments were required to close the legal gaps. Juvenile Justice Care and Protection, 2015 therefore replaced the Act.

## **B. AFGANISTAN**

The juvenile code of Afghanistan suggests imprisonment at home and community service as alternatives to jail for less serious offenses. It's critical to keep in mind that imprisonment

is just one choice among many. It should only be used as a final option. Omar Khadr, a Canadian citizen from Afghanistan, received US\$8.1 million from the Canadian government this month as compensation for the mistreatment he suffered as a minor in the US military prisons at Bagram and Guantanamo. At the age of fifteen when he was sentenced to prison, he was the youngest kid to be found guilty of war crimes since the Second World War. The Canadian courts concluded that there had been a breach of his minor's fundamental rights.

#### **IV. Comparison of Different Juvenile Justice Systems**

##### **A. Legal Age of Responsibility**

Across countries, variations exist in the legal age at which individuals are held responsible for criminal acts. This age threshold impacts juvenile offenders and society as a whole, influencing legal proceedings and rehabilitation efforts. Global trends point towards the need for consistency and collaboration in setting age limits.

##### **B. Rehabilitation Vs. Punishment**

The debate between rehabilitation and punishment in juvenile justice remains ongoing, with different countries adopting various approaches. The effectiveness of rehabilitation programs in reducing recidivism rates highlights the importance of providing young offenders with support and guidance to prevent future offenses.

#### **V. Conclusion**

To preserve the rights of young offenders, lawmakers should make changes and critically assess juvenile justice care and protection. Although there are laws governing juvenile justice care in many different countries across the world, their execution is not given much concern by legislators. Instead of being sent to camps for safety and appropriate behavior modification training after being caught for a crime, young offenders are left behind. Few countries violate the fundamental rights of young offenders by sentencing them to the same terms as adults. The juvenile rules that are now in place in the majority of countries are not having the desired effect. Therefore, policymakers should make laws that will balance both re-habitation and punishment for the betterment of young ones.

Together, let's work to foster worldwide collaboration as well as comprehension in juvenile justice. When we work together, we can positively impact the lives of youth all throughout the world.

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