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SUPREME COURT CLARIFIES JURISDICTIONAL LIMITS OF JUVENILE JUSTICE BOARD IN AGE DETERMINATION CASES

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Subject: Juvenile Justice Board's Jurisdiction on Reviewing Age Determination: Legal Analysis

Case Name: Rajni v. State of Uttar Pradesh & Another

Judges: Justice Abhay S. Oka and Justice Ujjal Bhuyan

Date of Judgment: 20 May 2025

Citation: 2025 (SC) 602

Court: Supreme Court of India

Case No.: Criminal Appeal No. 1275 of 2025

Parties:

- Petitioner: Rajni
- Respondent: State of Uttar Pradesh & Another

Introduction

The Supreme Court of India, in its landmark judgment in *Rajni v. State of Uttar Pradesh & Another* delivered on May 20, 2025, has decisively clarified the jurisdictional limits of the Juvenile Justice Board (JJB) under the Juvenile Justice (Care and Protection of Children) Act, 2015. The Court held that the JJB does not have the authority to review or overturn its own orders in subsequent proceedings, as the statute does not confer any such review jurisdiction upon it.

This ruling arose from a case in which the JJB initially accepted the date of birth of the alleged juvenile based on valid documentary evidence but later contradicted its own finding by relying on a medical board's opinion. The bench, comprising Justice Abhay S. Oka and Justice Ujjal Bhuyan, emphasized the primacy of documentary proof over medical evidence in age determination and reaffirmed the legal finality and sanctity of the Board's initial findings.

This judgment holds significant importance in safeguarding the integrity of juvenile justice procedures and upholding the statutory protections guaranteed to children in conflict with the law. By reinforcing procedural certainty and evidentiary hierarchy, the Supreme Court has strengthened the child-centric and reformative ethos of the juvenile justice system.

Facts

- The case arose from criminal proceedings involving Respondent No. 2, who claimed juvenility at the time of the alleged offence.
- The Juvenile Justice Board (JJB) initially accepted the respondent's date of birth as September 8, 2003, based on a school certificate, under Section 94 of the Juvenile Justice (Care and Protection of Children) Act, 2015.
- Based on this documentary evidence, the respondent was declared a juvenile at the time of the offence.
- In subsequent proceedings under Section 15 of the Act (preliminary assessment for trial as an adult), the JJB sought and relied on a medical board's report estimating the respondent's age to be 21 years.
- The JJB, without any fresh or exceptional reason, contradicted its earlier finding and treated the respondent as an adult.
- The respondent applied for bail, which was granted by the High Court on the ground that he had already been declared a juvenile and posed no societal threat.
- The State of Uttar Pradesh challenged the High Court's bail order before the Supreme Court, contesting the respondent's claim of juvenility based on the later medical opinion.
- The Supreme Court was required to determine whether the JJB has the authority to review or reverse its own previous decision regarding age determination.

Arguments

Petitioner (State of Uttar Pradesh):

1. Challenge to Age Determination:
 - Argued that the Juvenile Justice Board (JJB) was justified in relying on the medical board's opinion in the subsequent proceedings under Section 15 of the Juvenile Justice Act, which assessed the respondent's age as 21 years.

2. Validity of Medical Evidence:
 - Asserted that medical examination provided a more accurate estimate of the respondent's age and should prevail over documentary evidence when doubt exists.
3. Need for Trial as an Adult:
 - Contended that the seriousness of the offence warranted a trial as an adult, and the preliminary assessment justified treating the respondent accordingly.
4. Bail Objection:
 - Opposed the High Court's decision to grant bail, arguing that the preliminary assessment and age determination by medical board supported continued detention and trial under adult procedures.

Respondent (Accused):

1. Finality of Earlier Order:
 - Maintained that the JJB had already determined his age based on valid documentary evidence (school certificate), and such an order could not be reviewed or contradicted by the JJB itself.
2. Lack of Review Jurisdiction:
 - Argued that the Juvenile Justice Act does not confer any review powers on the JJB, and thus, the later reliance on medical opinion was without jurisdiction and legally unsustainable.
3. Hierarchy of Evidence:
 - Emphasized that as per Section 94(2) of the Act, documentary evidence such as matriculation or school records take precedence over medical opinions unless such documents are unavailable.
4. Right to Bail:
 - Defended the High Court's bail order, noting that once declared a juvenile, the respondent was entitled to mandatory bail, and there was no material showing that his release would harm society or himself.
5. Protection Under Juvenile Justice Law:
 - Stressed that all proceedings should be guided by the best interests of the child principle, and procedural deviations undermine the protective framework of the law.

Legal Issues

1. Whether the Juvenile Justice Board (JJB) has the statutory authority to review or revise its own earlier order determining juvenility.
2. Whether the JJB can disregard documentary evidence (school records) accepted in an earlier proceeding and subsequently rely on a medical board's opinion to reassess the age of the accused.
3. What is the evidentiary hierarchy under Section 94 of the Juvenile Justice (Care and Protection of Children) Act, 2015, in determining the age of a child in conflict with law?
4. Whether the High Court was justified in granting bail to the respondent after he was initially declared a juvenile.
5. Whether a preliminary assessment under Section 15 of the Act overrides the protective and procedural safeguards available to a juvenile, including the right to bail.

Supreme Court Holding

The Supreme Court, in *Rajni v. State of Uttar Pradesh & Another* delivered the following key holdings:

1. Juvenile Justice Board Has No Power of Review:
 - The Court categorically held that the Juvenile Justice Board (JJB) is not vested with any review jurisdiction under the Juvenile Justice (Care and Protection of Children) Act, 2015. Once the JJB has determined the age of the accused based on valid evidence, it cannot revisit or contradict its own finding in a subsequent proceeding.
2. Primacy of Documentary Evidence:
 - The Court reaffirmed that under Section 94(2) of the Act, documentary evidence, such as birth certificates or school records, must be given precedence over medical opinion in determining the age of a juvenile.
 - Medical evidence (e.g., ossification tests) can only be considered in the absence of credible documentary proof.
3. Illegal Reliance on Medical Opinion:
 - The JJB's act of obtaining and relying upon a medical board's report in contradiction of previously accepted school records was held to be unlawful and without jurisdiction.

4. Upholding Bail Granted by High Court:
 - The Supreme Court upheld the High Court's order granting bail to the respondent, noting that once he had been declared a juvenile and there was no material suggesting his release would be harmful, bail was legally warranted under the Act.
5. Protection of Juvenile Rights:
 - The Court emphasized that juvenile justice legislation is beneficial and welfare-oriented. The statutory rights and protections available to juveniles cannot be overridden by procedural inconsistencies or unauthorized re-evaluations by the Board.

In essence, the ruling reinforces the finality and sanctity of the JJB's findings when made in accordance with law and safeguards the procedural integrity of juvenile justice proceedings.

Reasoning of the Supreme Court

1. No Review Jurisdiction for JJB:

The Juvenile Justice Board (JJB) is not granted any power under the Juvenile Justice (Care and Protection of Children) Act, 2015, to review or alter its own prior orders. The Court held that allowing such review would be beyond the statutory framework and undermine the finality of the Board's decisions.
2. Finality of Documentary Evidence:

Once the JJB accepts valid documentary proof such as a school certificate or birth record to establish the age of the accused, that determination must be treated as final and conclusive. The Court emphasized that such documentary evidence has a higher evidentiary value and cannot be casually disregarded.
3. Evidentiary Hierarchy under Section 94(2):

The Act clearly prescribes that documentary evidence must be given precedence in age determination. Medical evidence, like ossification tests, can only be used in the absence of reliable documentary proof. This hierarchy aims to avoid unnecessary trauma to juveniles and uphold legal certainty.
4. Illegitimacy of Contradictory Medical Opinion:

In the present case, after accepting the school records, the JJB wrongly sought a medical board's opinion and relied on it to contradict its earlier order. The Supreme Court held this to be illegal and outside the Board's jurisdiction, stressing that no fresh or

compelling evidence justified revisiting the earlier decision.

5. Procedural Fairness and Legal Certainty:

The Court noted that allowing the JJB to revisit age determination without statutory sanction or new evidence would erode procedural fairness and judicial finality, leading to confusion and injustice in juvenile proceedings.

6. Statutory Right to Bail for Juveniles:

The Court reiterated that juveniles have a statutory right to bail under Section 12 of the Act. Bail can only be denied if there is concrete evidence that the juvenile's release would pose a risk to society or themselves.

7. Justification of Bail Grant:

Since the respondent had been declared a juvenile and no such risk was demonstrated, the High Court's order granting bail was appropriate and consistent with the rehabilitative philosophy of juvenile justice.

8. Child-Centric Approach of the Juvenile Justice System:

The judgment reinforces that the juvenile justice system is designed to be protective, reformative, and welfare-oriented. The statutory safeguards must be strictly followed to ensure that juveniles' rights are upheld, and they are not subjected to arbitrary or contradictory proceedings.

9. Ensuring Integrity of Juvenile Justice Proceedings:

The Supreme Court's decision underscores the need to maintain procedural discipline and respect the evidentiary framework laid out by the legislature, thereby ensuring the integrity and effectiveness of the juvenile justice system.

Key Legal Principles Reaffirmed

1. No Review Jurisdiction of the Juvenile Justice Board:

The Juvenile Justice Board (JJB) does not have the authority to review, reconsider, or overturn its own earlier orders, especially regarding the determination of juvenility, unless explicitly empowered by statute.

2. Primacy of Documentary Evidence in Age Determination:

Under Section 94(2) of the Juvenile Justice Act, valid documentary proof such as birth certificates or school records must be given precedence over medical evidence when determining a juvenile's age.

3. Medical Evidence as Secondary:

Medical opinions, including ossification tests, are admissible only when documentary

evidence is absent, unreliable, or disputed, and cannot override clear documentary records.

4. Finality and Certainty in Juvenile Proceedings:

The principle of finality is crucial; once the JJB has accepted reliable evidence and made a determination, that decision should not be arbitrarily reopened to ensure stability and procedural fairness.

5. Statutory Right to Bail for Juveniles:

Juveniles are entitled to bail as a right under Section 12 of the Juvenile Justice Act, and bail can only be refused if the juvenile poses a real threat to society or the legal process.

6. Child-Centric and Welfare-Oriented Approach:

The juvenile justice system prioritizes rehabilitation and protection of the child, mandating strict adherence to procedural safeguards to uphold the best interests of juveniles.

7. Adherence to Legislative Framework:

All actions and decisions by the JJB and other authorities must strictly conform to the statutory framework laid down by the Juvenile Justice Act to prevent abuse of power and ensure justice.

Critical Commentary

1. The Supreme Court decisively restricts the Juvenile Justice Board's (JJB) power by holding that it cannot review or reverse its own prior orders, ensuring legal finality and protecting juveniles from inconsistent rulings.
2. The judgment rightly prioritizes documentary evidence over medical tests for age determination, promoting fairness given the limitations and variability of medical assessments.
3. A major practical challenge remains: poor availability of reliable birth and school records in many areas often forces reliance on less accurate medical evidence.
4. The ruling highlights the urgent need for improved record-keeping systems and broader systemic reforms to support accurate and just juvenile justice proceedings.
5. Capacity-building and specialized training for JJB members are critical to ensure correct application of evidentiary standards and procedural safeguards.
6. The reaffirmation of juveniles' statutory right to bail reinforces the rehabilitative focus of juvenile justice but exposes inconsistencies in bail practices across jurisdictions.

7. Overall, the judgment strengthens legal protections for juveniles but underscores that meaningful reform requires effective implementation and addressing systemic gaps.

Conclusion

The Supreme Court's decision in *Rajni v. State of Uttar Pradesh & Another* serves as a crucial clarification on the scope and limitations of the Juvenile Justice Board's powers under the Juvenile Justice (Care and Protection of Children) Act, 2015. By ruling that the JJB lacks jurisdiction to review or overturn its own earlier orders, the Court has reinforced the legal certainty and procedural integrity vital to juvenile justice proceedings. The judgment further affirms the primacy of documentary evidence in age determination and safeguards the statutory rights of juveniles, including their right to bail. Importantly, this ruling underscores the child-centric and rehabilitative objectives of the juvenile justice system, ensuring that children in conflict with law are afforded due protection and are not subjected to arbitrary or contradictory adjudications. This decision will serve as a guiding precedent, strengthening the framework within which juveniles are dealt with by the justice system in India.

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