

# INTERNATIONAL JOURNAL FOR LEGAL RESEARCH AND ANALYSIS



Open Access, Refereed Journal Multi Disciplinary  
Peer Reviewed

[www.ijlra.com](http://www.ijlra.com)

## **DISCLAIMER**

No part of this publication may be reproduced or copied in any form by any means without prior written permission of Managing Editor of IJLRA. The views expressed in this publication are purely personal opinions of the authors and do not reflect the views of the Editorial Team of IJLRA.

Though every effort has been made to ensure that the information in Volume II Issue 7 is accurate and appropriately cited/referenced, neither the Editorial Board nor IJLRA shall be held liable or responsible in any manner whatsoever for any consequences for any action taken by anyone on the basis of information in the Journal.

Copyright © International Journal for Legal Research & Analysis

## **EDITORIALTEAM**

### **EDITORS**

#### **Dr. Samrat Datta**

*Dr. Samrat Datta Seedling School of Law and Governance, Jaipur National University, Jaipur. Dr. Samrat Datta is currently associated with Seedling School of Law and Governance, Jaipur National University, Jaipur. Dr. Datta has completed his graduation i.e., B.A.LL.B. from Law College Dehradun, Hemvati Nandan Bahuguna Garhwal University, Srinagar, Uttarakhand. He is an alumnus of KIIT University, Bhubaneswar where he pursued his post-graduation (LL.M.) in Criminal Law and subsequently completed his Ph.D. in Police Law and Information Technology from the Pacific Academy of Higher Education and Research University, Udaipur in 2020. His area of interest and research is Criminal and Police Law. Dr. Datta has a teaching experience of 7 years in various law schools across North India and has held administrative positions like Academic Coordinator, Centre Superintendent for Examinations, Deputy Controller of Examinations, Member of the Proctorial Board*



#### **Dr. Namita Jain**

*Head & Associate Professor*

*School of Law, JECRC University, Jaipur Ph.D. (Commercial Law) LL.M., UGC -NET Post Graduation Diploma in Taxation law and Practice, Bachelor of Commerce.*



*Teaching Experience: 12 years, AWARDS AND RECOGNITION of Dr. Namita Jain are - ICF Global Excellence Award 2020 in the category of educationalist by I Can Foundation, India. India Women Empowerment Award in the category of "Emerging Excellence in Academics by Prime Time & Utkrisht Bharat Foundation, New Delhi.(2020). Conferred in FL Book of Top 21 Record Holders in the category of education by Fashion Lifestyle Magazine, New Delhi. (2020). Certificate of Appreciation for organizing and managing the Professional Development Training Program on IPR in Collaboration with Trade Innovations Services, Jaipur on March 14th, 2019*

## Mrs.S.Kalpana

Assistant professor of Law

*Mrs.S.Kalpana, presently Assistant professor of Law, VelTech Rangarajan Dr.Sagunthala R & D Institute of Science and Technology, Avadi. Formerly Assistant professor of Law, Vels University in the year 2019 to 2020, Worked as Guest Faculty, Chennai Dr.Ambedkar Law College, Pudupakkam. Published one book. Published 8Articles in various reputed Law Journals. Conducted 1Moot court competition and participated in nearly 80 National and International seminars and webinars conducted on various subjects of Law. Did ML in Criminal Law and Criminal Justice Administration. 10 paper presentations in various National and International seminars. Attended more than 10 FDP programs. Ph.D. in Law pursuing.*



## Avinash Kumar



*Avinash Kumar has completed his Ph.D. in International Investment Law from the Dept. of Law & Governance, Central University of South Bihar. His research work is on "International Investment Agreement and State's right to regulate Foreign Investment." He qualified UGC-NET and has been selected for the prestigious ICSSR Doctoral Fellowship. He is an alumnus of the Faculty of Law, University of Delhi. Formerly he has been elected as Students Union President of Law Centre-1, University of Delhi. Moreover, he completed his LL.M. from the University of Delhi (2014-16), dissertation on "Cross-border Merger & Acquisition"; LL.B. from the University of Delhi (2011-14), and B.A. (Hons.) from Maharaja Agrasen College, University of Delhi. He has also obtained P.G. Diploma in IPR from the Indian Society of International Law, New Delhi. He has qualified UGC – NET examination and has been awarded ICSSR – Doctoral Fellowship. He has published six-plus articles and presented 9 plus papers in national and international seminars/conferences. He participated in several workshops on research methodology and teaching and learning.*

## **ABOUT US**

INTERNATIONAL JOURNAL FOR LEGAL RESEARCH & ANALYSIS  
ISSN

2582-6433 is an Online Journal is Monthly, Peer Review, Academic Journal, Published online, that seeks to provide an interactive platform for the publication of Short Articles, Long Articles, Book Review, Case Comments, Research Papers, Essay in the field of Law & Multidisciplinary issue. Our aim is to upgrade the level of interaction and discourse about contemporary issues of law. We are eager to become a highly cited academic publication, through quality contributions from students, academics, professionals from the industry, the bar and the bench. INTERNATIONAL JOURNAL FOR LEGAL RESEARCH & ANALYSIS ISSN 2582-6433 welcomes contributions from all legal branches, as long as the work is original, unpublished and is in consonance with the submission guidelines.

# **THE PROTECTION OF CHILDREN FROM SEXUAL OFFENCES (POCSO) ACT: A LEGAL ANALYSIS**

AUTHORED BY - LUNAVATH RAMESH

Research Scholar (Ph.D)

Department of Law, Kakatiya University, Hanamkonda

## **Abstract:**

The Protection of Children from Sexual Offences (POCSO) Act, 2012, represents a landmark legal framework in India aimed at safeguarding children from sexual abuse and exploitation. This analysis examines the Act's key provisions, including definitions of various sexual offenses, ranging from penetrative sexual assault to sexual harassment, and the corresponding punishments. It explores the Act's child-centric approach, emphasizing the importance of a supportive and non-threatening environment during investigation and trial proceedings. The study delves into the roles and responsibilities of various stakeholders, such as law enforcement agencies, medical professionals, and social welfare organizations, in implementing the Act effectively. It further analyzes the amendments introduced in 2019, which aimed to strengthen the Act and make punishments more stringent. The analysis also discusses critical judgments that have shaped the interpretation and application of the POCSO Act, highlighting the evolving jurisprudence in this area. Finally, the study identifies challenges in the Act's implementation, including low reporting rates and the need for greater public awareness, and suggests potential strategies for improving its effectiveness in protecting children.

**Keywords:** POCSO Act, child sexual abuse, sexual offenses, child protection, legal analysis, India, child rights, criminal law, victim compensation.

## **Introduction**

A child is indeed one of God's most precious creations, arriving in the world innocent, immature, and entirely dependent on the adults around them. This stage of life is universal, a shared experience for every human being. The way a society nurtures its children has profound implications, shaping not only individual lives but also determining the future of the nation itself. The well-being of children is not just a local concern; it's a global imperative, demanding that nations prioritize the creation of safe, secure, and nurturing environments conducive to

their healthy development.

While the legal definition of a child often centers around the age of 18, varying slightly from country to country, the essence of childhood goes beyond a simple number. The United Nations Convention on the Rights of the Child (UNCRC), adopted in 1989, provides a comprehensive framework, defining a child as every human being below the age of 18 years. Crucially, the UNCRC goes beyond mere definition, explicitly outlining a broad spectrum of children's rights. This landmark convention places a clear obligation on governments to not only meet children's basic needs but also to actively facilitate their full potential, ensuring their physical, mental, social, and emotional growth.

At the heart of the UNCRC lies the recognition of fundamental principles that underpin all child rights. These include, but are not limited to:

**The right to survival and development:** This encompasses access to essential resources like nutrition, healthcare, education, and a safe living environment, all crucial for a child's physical and intellectual growth.

**The right to non-discrimination:** Every child, regardless of their race, ethnicity, gender, religion, disability, or social origin, is entitled to the same rights and opportunities. This principle emphasizes equity and inclusion.

**The right to protection:** Children must be shielded from all forms of abuse, neglect, exploitation, and violence. This includes safeguarding them from harmful labor, trafficking, and involvement in armed conflict.

**The right to participation:** Children's voices matter. They have the right to express their opinions and participate in decisions that affect their lives, in accordance with their age and maturity. This recognizes their agency and developing autonomy.

**The best interests of the child:** In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities, or legislative bodies, the best interests of the child shall be a primary consideration. This principle ensures that children's needs are at the forefront of decision-making.

Beyond these core rights, the UNCRC also addresses specific areas like education, leisure, cultural activities, and the rights of children with disabilities. It emphasizes the importance of family and community in a child's development and stresses the need for supportive

environments that foster their well-being. The convention serves as a powerful tool for advocacy, holding governments accountable for their commitments to children and providing a framework for organizations and individuals working to improve children's lives worldwide.

### **Background of Child Sexual Abuse Penal Laws**

Crimes against children, particularly those of a sexual nature, have tragically increased over the years. Prior to 2012, India lacked dedicated legislation addressing these offenses. While the Goa Children's Act, 2003 and Rules, 2004, along with sections 354, 375, and 377 of the Indian Penal Code, 1860, offered some legal recourse, they proved inadequate. These provisions failed to protect male children comprehensively, and the Indian Penal Code lacked clear definitions of "modesty" and "unnatural offense," hindering effective prosecution of crimes against children. Despite the United Nations adopting the Convention on the Rights of the Child in 1989, India lacked specific legislation for child protection until the Protection of Children from Sexual Offences Act, 2012 (POCSO Act), which finally came into force on November 14, 2012. This act was a crucial step in addressing the growing problem of child sexual abuse in India.

Data reveals the alarming prevalence of child sexual abuse in India. According to the National Crime Records Bureau (2016), child rape constituted a staggering 34.4% (36,022 cases) of those recorded under the POCSO Act. The highest concentration of these cases was reported in Uttar Pradesh (15.3%), Maharashtra (13.6%), and Madhya Pradesh (13.1%). Studies further underscore this crisis: a Kerala study found that 36% of adolescent boys and 35% of girls had experienced sexual abuse. Even more disturbingly, a Government of India survey of 17,220 children and adolescents indicated that nearly every second child had been sexually molested, with boys comprising 52.94% of victims and girls 47.06%. State-wise, Assam reported the highest incidence of sexual abuse (57.27%), followed by Delhi (41%), Andhra Pradesh (33.87%), and Bihar (33.27%).

### **Protection of Children from Sexual Offences Act, 2012:**

The Protection of Children from Sexual Offences Act, 2012 (POCSO) is a landmark legislation in India designed to safeguard children from sexual abuse, exploitation, and harassment. It defines a child as any person below 18 years of age and encompasses a wide range of offenses, including penetrative sexual assault, sexual assault, sexual harassment, and child

pornography. POCSO mandates stringent punishments for offenders, with penalties increasing based on the severity of the crime. The Act also establishes special courts to ensure speedy trials and child-friendly procedures for recording evidence and conducting investigations.

A key feature of POCSO is its emphasis on the child's best interests. It prioritizes the child's well-being throughout the legal process, providing support services and protecting their identity. The Act also places a responsibility on individuals to report cases of child sexual abuse, with penalties for failure to do so. POCSO represents a significant step towards creating a safer environment for children in India, but effective implementation and awareness remain crucial to its success.

### **Nature of Offences:**

The POCSO Act, 2012 addresses a wide spectrum of sexual offenses against children, categorized by their nature and severity. These include penetrative sexual assault (Section 4), involving any form of penetration, and sexual assault (Section 7), encompassing unwanted touching with sexual intent. The Act also criminalizes sexual harassment (Section 9), like inappropriate comments or gestures, and child pornography (Section 14), including producing or distributing such material. Other offenses include abetment of these crimes and failure to report them. The nature of the offense dictates the severity of punishment, ranging from imprisonment to life imprisonment and fines.

### **Sexual Assault:**

Under the POCSO Act of 2012, sexual assault (Section 7) involves any act with sexual intent that includes physical contact without penetration. This encompasses touching a child's vagina, penis, anus, or breast, or making the child touch these areas of another person. Any other act with similar sexual intent also qualifies. Essentially, unwanted touching of a child's private parts (genitals and breasts), or causing a child to touch another's private parts, with sexual intent, is sexual assault. Section 8 prescribes a minimum three-year imprisonment, extendable to five years, plus a fine, for this offense.

### **Penetrative Sexual Assault:**

Penetrative sexual assault, as defined under Section 3 of the Protection of Children from Sexual Offences (POCSO) Act, is a grave crime involving the penetration of a child's body. This

includes penetration, to any extent, of a penis into a child's vagina, mouth, urethra, or anus, or causing the child to perform such an act on themselves or another person. It also encompasses inserting any object or body part (other than the penis) into the child's vagina, urethra, or anus, or coercing the child to do so. Manipulating a child's body to cause penetration into any body part, or forcing the child to do so, also constitutes this offense. Finally, applying one's mouth to the child's genitals or anus, or making the child perform this act, is considered penetrative sexual assault. The severity of this crime is reflected in the punishments prescribed under Section 4 of the POCSO Act, ranging from a minimum of ten years' imprisonment to life imprisonment, along with a fine, with harsher penalties for victims under sixteen.

### **Aggravated Penetrative Sexual Assault:**

Section 5 of the Protection of Children from Sexual Offences (POCSO) Act defines instances of penetrative sexual assault that constitute "aggravated penetrative sexual assault." These include penetrative sexual assaults committed on a child by:

- A police officer within the vicinity of a police station.
- Members of the armed forces within their designated area of operation.
- A public servant.
- Staff members of jails, hospitals, or educational institutions.

Section 6 of the POCSO Act prescribes the punishment for aggravated penetrative sexual assault. It mandates rigorous imprisonment for a term not less than twenty years, which may extend to life imprisonment (meaning imprisonment for the remainder of the offender's natural life), and also includes a fine, or even the death penalty. The 2019 amendment to Section 6 has further strengthened the penalties for this offense.

### **Sexual Harassment:**

The Protection of Children from Sexual Offences (POCSO) Act, 2012, doesn't explicitly define "sexual harassment" as a separate offense. Instead, it addresses various forms of sexual abuse and exploitation against children, encompassing actions that would commonly be understood as sexual harassment. The Act focuses on the nature of the act and its impact on the child, rather than labeling it specifically as "harassment." Several provisions within the POCSO Act address behaviors that constitute sexual harassment. These include:

**Sexual assault (various forms):** The Act covers a wide range of sexual offenses, from touching to penetration, all of which would qualify as severe forms of sexual harassment.

**Harassment:** While not defined separately, the concept of harassment is covered through provisions dealing with inappropriate touching, gestures, or words with sexual connotations directed at a child. Such actions, even if not amounting to assault, are punishable under the POCSO Act if they are deemed to be of a sexual nature and harmful to the child.

**Child pornography:** Creating or possessing child pornography, a form of sexual exploitation, is also a punishable offense under the Act. This can be related to online or digital forms of harassment.

**Stalking/cyberstalking:** Following or contacting a child repeatedly in a way that makes them feel unsafe or uncomfortable, including through online means, can be considered harassment and is covered under related laws, often in conjunction with the POCSO Act.

### **Using Child for Pornography:**

Section 13 of the POCSO Act criminalizes using a child for pornographic purposes, including depicting a child's sexual organs or involving them in real or simulated sexual acts, or any indecent/obscene portrayal in any media. Sections 14 and 15 outline punishments. Section 14 prescribes at least five years' imprisonment and a fine for first convictions, and at least seven years for subsequent convictions. Section 15 addresses possession/storage. Mere possession incurs a fine (at least 5,000, 10,000 for repeat offenses). Storing, possessing, transmitting, propagating, displaying, or distributing (except for reporting) can lead to three years' imprisonment, fine, or both. For commercial purposes, first convictions carry 3-5 years' imprisonment, fine, or both; subsequent convictions, 5-7 years and a fine.

### **Attempt to Child Sexual Abuse:**

Section 18 enunciates that attempt to commit any offence under the POCSO Act, 2012 is also an offence inviting either of the two following punishments:

- Imprisonment provided for that offence for a term extending upto one-half of the imprisonment for life, with or without fine;
- Imprisonment provided for that offence for a term extending upto one-half of the longest term of imprisonment with or without fine.

### **Trial of Cases under POCSO Act:**

Chapter VII of the POCSO Act mandates the establishment of special courts in every district for the swift trial of offenses under the Act. Section 28 stipulates that the State Government, in

consultation with the High Court Chief Justice, designate a sessions court in each district as a special court. These special courts also have jurisdiction over offenses under Section 67B of the Information Technology Act, 2000, specifically concerning the publication or transmission of sexually explicit material depicting children or facilitating online child abuse.

Section 35 of POCSO Act lays down the following timelines:

1. Recording evidence of the child: 30 days from the date of taking cognizance of the offence,
2. Completion of trial: 1 year from the date of taking cognizance of the offence.

In *Shubham Vilas Tayade v. State of Maharashtra* (Crl.W.P. No. 68 of 2018), the Special Court permitted the prosecution to record evidence more than 30 days after taking cognizance. The accused challenged this order, claiming it violated Section 35 of the POCSO Act. The Bombay High Court upheld the order, agreeing with the Additional Public Prosecutor's argument that since the accused hadn't challenged the prosecution's application, they couldn't challenge the resulting order. The Court further clarified that Special Courts *can* record evidence after 30 days; Section 35 only requires recording the reasons for any delay.

### **Medical Examination:**

Medical examinations of children under the POCSO Act require utmost care. Rule 5(3) of the POCSO Rules, 2012, mandates that emergency medical care be provided without requiring any legal or other documentation. Section 27 outlines specific procedures: The examination must comply with Section 164A of the CrPC. A female practitioner must examine a girl child. The examination should occur in the presence of a trusted person (e.g., parent) or, if unavailable, a woman nominated by the head of the medical institution.

### **Investigation and Trial:**

Sections 24, 26, and 33 of the POCSO Act outline child-sensitive investigation and trial procedures. Key considerations include:

- Statements are ideally recorded at the child's residence by a female officer in plain clothes.
- Contact between the child and the accused is avoided.
- Children are not detained overnight at police stations.
- The child's identity is protected.
- A trusted person (e.g., parent) is present during statement recording.

- Statements are preferably audio-visually recorded.
- Translators/interpreters are used when needed.
- Frequent breaks are provided during trials.
- The Special Court minimizes the child's court appearances.
- Aggressive questioning is prohibited.

### **Last Seen Theory:**

The theory of last seen is applied in the child sexual abuse trials. According to this theory, the person who is last seen with the victim is assumed to be the perpetrator of the offence when the time gap between the point when they were last seen alive is so minute that it is not possible that any other person could have committed the crime.

However, the Hon'ble Supreme Court in *Shyamal Ghosh vs. State of West Bengal reported in AIR 2012 SC 3539* held that it is not reasonable for the courts to apply last seen theory when the time gap is large.

### **Section 29 and 30 of POCSO Act:**

Sections 29 and 30 of the POCSO Act address the procedure and powers of Special Courts. Section 29 outlines the procedure for trial, stating that it should, as far as practicable, follow the procedure for trial of summons cases under the Code of Criminal Procedure, 1973. It emphasizes the need for a child-friendly atmosphere. Section 30 grants Special Courts the power to conduct summary trials, if deemed fit, for certain offenses under the Act, subject to the proviso that no sentence exceeding one year's imprisonment can be passed in such summary trials. These provisions aim to balance the need for swift justice with the child's well-being.

### **Compensation Under POCSO Act:**

The POCSO Act recognizes the severe impact of sexual offenses on children and provides for compensation to victims. While the Act itself doesn't specify a fixed amount, it emphasizes the victim's right to "reasonable" compensation for medical expenses, psychological support, rehabilitation, and other related needs. The fine imposed on the perpetrator is intended to be paid to the victim, but this is often insufficient. Therefore, State Governments are mandated to provide additional compensation from their own funds. The amount and nature of compensation are determined by the State Governments, often through schemes and guidelines,

considering the severity of the offense, the child's age, and their specific needs. The aim is to facilitate the child's recovery and reintegration into society. The National Commission for Protection of Child Rights (NCPCR) also plays a role in monitoring the implementation of compensation schemes and advocating for victims' rights.

In *Bijoy @ Guddu Das v. State of West Bengal* (2017) 2 Cal LJ 224, the Calcutta High Court addressed compensation under the POCSO Act. The Court held that Special Courts can award interim compensation for the immediate relief and rehabilitation of a child victim, based on the parameters in Rule 7(3) of the relevant rules. This state compensation is separate from any compensation the convict may be directed to pay under Section 357(2) and (3) of the CrPC. The Court emphasized that state compensation serves as reparation for the state's failure to protect the individual. The Court also referenced the State Government's Victim Compensation Fund under Section 357A CrPC, which prescribes minimum compensation amounts for various offenses/injuries.

The Calcutta High Court held that the state's Victim Compensation Fund, while not explicitly listing POCSO offenses, applies to them due to their similarity to offenses like rape and sexual assault. Special Courts can order interim or final compensation from this fund. Further, the Court clarified that under Section 33(8) of the POCSO Act and Rule 7, the Special Court's power to award compensation isn't limited by the Fund's amounts but allows for "reasonable and just" compensation based on Rule 7(3). The State must pay within 30 days of the order. The Court also emphasized that the scheme sets *minimum* compensation, allowing courts to award higher amounts based on individual case circumstances and Rule 7(3).

### **Key Features of POCSO Act:**

The POCSO Act includes several key features beyond its core definitions and punishments. Section 23 protects the victim's identity, prohibiting media disclosure of any information that could reveal it, unless permitted by the Special Court. The Calcutta High Court in *Bijoy @ Guddu Das* reinforced this, stating that any person, including police officers, breaching this confidentiality will be prosecuted. The Act is also gender-neutral, applying to both male and female victims and perpetrators, addressing a gap in the IPC. Finally, Sections 19-22 mandate reporting of child sexual abuse by those with knowledge or suspicion, recognizing the vulnerability of children and society's responsibility to protect them.

### **Skin to Skin Contact Case:**

In *Attorney General of India v. Satish & Others* (2021 SCC Online SC 42), the Supreme Court overturned a Bombay High Court judgment that required skin-to-skin contact for an offense under Section 8 of the POCSO Act. The Supreme Court clarified that "sexual intent," not skin-to-skin contact, is the crucial element for sexual assault under Section 7. The Court rejected any narrow interpretation that would undermine the purpose of the POCSO Act.

### **Conclusion:**

Prior to 2012, India lacked specific legislation addressing offenses against children. The POCSO Act, a gender-neutral law, aims to protect children and punish offenders based on the severity of their crimes. A 2019 amendment further strengthened punishments. Public awareness of child sexual abuse and the POCSO Act is crucial, given the low reporting rates. Child sexual abuse is a complex issue with medical, social, psychological, and legal ramifications. Physical symptoms are often absent, requiring specialized knowledge for history collection, forensic interviews, and medical examinations. Mental health experts are essential throughout the investigation and trial to address the psychological impact on child victims.

### **Suggestions:**

Improving the POCSO Act's effectiveness requires a multi-pronged approach. Increased public awareness campaigns are crucial to encourage reporting. Strengthening law enforcement training and resources for handling child sexual abuse cases is essential. Enhancing support services for victims, including counseling and rehabilitation, is vital for their recovery. Streamlining court procedures and ensuring timely trials can reduce further trauma. Addressing the issue of low conviction rates through improved evidence collection and witness protection is also necessary. Finally, continuous monitoring and evaluation of the Act's implementation, along with feedback from stakeholders, can help identify areas for improvement and ensure its long-term effectiveness in protecting children.

### **References:**

1. M.P. Jain ;='Indian Constitutional Law' (2013)
2. PSA Pillai; Criminal Law; 2015
3. T. Bhattacharya; Indian Penal Code; 2010
4. K.D. Gaur; Textbook on Indian Penal Code; 2015

5. Rama Kant Rai, History of child rights and child labour, accessed at <http://menengage.org/wpcontent/uploads/2014/06/History-of-child-rights-andchild-labour.pdf>
6. The Law Commission in its 172nd Commission Report The Planning Commission, Government of India,
7. Child Help US, <https://www.childhelp.org/child-abuse/>
8. <https://kidshealth.org/en/parents/child-abuse.html>
9. <https://www.childhelp.org/child-abuse/>
10. Dr. Pendhankar, PH, 'Ferocious presumption under the POCSO Act', <https://www.aironline.in/WW/fullContent.html>
11. <https://blog.ipleaders.in/pocso-act-everything-you-need-to-know/>
12. <https://indiankanoon.org/doc/22883435/>
13. [https://legalvidhiya.com/salient-features-of-protection-of-children-from-sexual-offences-act-2012/#\\_ftn4](https://legalvidhiya.com/salient-features-of-protection-of-children-from-sexual-offences-act-2012/#_ftn4)
14. <https://www.jkpi.org/pocso-act-features-challenges-controversies-and-recommendations/>
15. —Report of the Working Group on Child Rights for the 12th Five Year Plan (2012–2017)