

# 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, stored, transmitted, or distributed in any form or by any means, whether electronic, mechanical, photocopying, recording, or otherwise, without prior written permission of the Managing Editor of the *International Journal for Legal Research & Analysis (IJLRA)*.

The views, opinions, interpretations, and conclusions expressed in the articles published in this journal are solely those of the respective authors. They do not necessarily reflect the views of the Editorial Board, Editors, Reviewers, Advisors, or the Publisher of IJLRA.

Although every reasonable effort has been made to ensure the accuracy, authenticity, and proper citation of the content published in this journal, neither the Editorial Board nor IJLRA shall be held liable or responsible, in any manner whatsoever, for any loss, damage, or consequence arising from the use, reliance upon, or interpretation of the information contained in this publication.

The content published herein is intended solely for academic and informational purposes and shall not be construed as legal advice or professional opinion.

**Copyright © International Journal for Legal Research & Analysis.  
All rights reserved.**

## ABOUT US

The *International Journal for Legal Research & Analysis (IJLRA)* (ISSN: 2582-6433) is a peer-reviewed, academic, online journal published on a monthly basis. The journal aims to provide a comprehensive and interactive platform for the publication of original and high-quality legal research.

IJLRA publishes Short Articles, Long Articles, Research Papers, Case Comments, Book Reviews, Essays, and interdisciplinary studies in the field of law and allied disciplines. The journal seeks to promote critical analysis and informed discourse on contemporary legal, social, and policy issues.

The primary objective of IJLRA is to enhance academic engagement and scholarly dialogue among law students, researchers, academicians, legal professionals, and members of the Bar and Bench. The journal endeavours to establish itself as a credible and widely cited academic publication through the publication of original, well-researched, and analytically sound contributions.

IJLRA welcomes submissions from all branches of law, provided the work is original, unpublished, and submitted in accordance with the prescribed submission guidelines. All manuscripts are subject to a rigorous peer-review process to ensure academic quality, originality, and relevance.

Through its publications, the *International Journal for Legal Research & Analysis* aspires to contribute meaningfully to legal scholarship and the development of law as an instrument of justice and social progress.

## ***PUBLICATION ETHICS, COPYRIGHT & AUTHOR RESPONSIBILITY STATEMENT***

The *International Journal for Legal Research and Analysis (IJLRA)* is committed to upholding the highest standards of publication ethics and academic integrity. All manuscripts submitted to the journal must be original, unpublished, and free from plagiarism, data fabrication, falsification, or any form of unethical research or publication practice. Authors are solely responsible for the accuracy, originality, legality, and ethical compliance of their work and must ensure that all sources are properly cited and that necessary permissions for any third-party copyrighted material have been duly obtained prior to submission. Copyright in all published articles vests with IJLRA, unless otherwise expressly stated, and authors grant the journal the irrevocable right to publish, reproduce, distribute, and archive their work in print and electronic formats. The views and opinions expressed in the articles are those of the authors alone and do not reflect the views of the Editors, Editorial Board, Reviewers, or Publisher. IJLRA shall not be liable for any loss, damage, claim, or legal consequence arising from the use, reliance upon, or interpretation of the content published. By submitting a manuscript, the author(s) agree to fully indemnify and hold harmless the journal, its Editor-in-Chief, Editors, Editorial Board, Reviewers, Advisors, Publisher, and Management against any claims, liabilities, or legal proceedings arising out of plagiarism, copyright infringement, defamation, breach of confidentiality, or violation of third-party rights. The journal reserves the absolute right to reject, withdraw, retract, or remove any manuscript or published article in case of ethical or legal violations, without incurring any liability.

# **UNIFORM CIVIL CODE AND JUVENILE JUSTICE: RIGHTS AND HISTORICAL PERSPECTIVES**

AUTHORED BY - PRIYANKA BHATI

Assistant Professor,  
HIMT Group of Institutions, Greater Noida, Uttar Pradesh, India,

CO-AUTHOR - VIJAY KUMAR VERMA

Research Scholar, Teerthanker Mahaveer College of Law & Legal Studies,  
Teerthanker Mahaveer University, Moradabad, Uttar Pradesh, India,

## **ABSTRACT**

The debate surrounding the Uniform Civil Code (UCC) in India has traditionally focused on issues of gender justice, secularism and constitutional morality. However, its implications for children and the juvenile justice system have received comparatively limited scholarly attention. Juvenile justice in India is governed by a rights-based and child-centric legal framework aimed at ensuring care, protection, rehabilitation and social reintegration of children. At the same time, the continued application of diverse personal laws in matters such as guardianship, adoption, maintenance and custody often results in unequal treatment of children across religious and social communities. This paper examines the relationship between the Uniform Civil Code and the juvenile justice system from rights-based and historical perspectives. It analyzes constitutional provisions, statutory frameworks, judicial interpretations and international child rights standards to assess whether legal pluralism undermines the uniform protection of juvenile rights. The study argues that the absence of a uniform civil framework contributes to inconsistencies in the realization of child rights, thereby challenging the principles of equality and non-discrimination. It further contends that a child-centric approach to the Uniform Civil Code, aligned with constitutional values and juvenile justice principles, has the potential to harmonize personal laws while prioritizing the best interests of the child. The paper concludes that integrating juvenile justice objectives with the constitutional vision of the Uniform Civil Code can strengthen child rights protection and promote equality, dignity and justice for all children in India.

**Keywords:** *Uniform Civil Code; Juvenile Justice; Child Rights; Legal Pluralism; Constitutional Morality; Best Interests of the Child; personal laws*

## CONCEPTUAL FRAMEWORK: UNIFORM CIVIL CODE AND JUVENILE JUSTICE

The conceptual framework of this study is grounded in the interrelationship between the Uniform Civil Code (UCC), juvenile justice and child rights within the Indian constitutional system. The Uniform Civil Code, envisaged under Article 44 of the Constitution, represents the ideal of uniformity in civil laws governing personal matters such as marriage, divorce, adoption, guardianship and inheritance. Juvenile justice, on the other hand, is rooted in a child-centric and welfare-oriented approach that prioritizes care, protection, rehabilitation and the best interests of the child, as reflected in the Juvenile Justice (Care and Protection of Children) Act, 2015.

This framework conceptualizes children as rights-holders entitled to equality, dignity and protection under Articles 14, 15 and 21 of the Constitution. It recognizes that legal pluralism arising from diverse personal laws often leads to differential treatment of children across religious communities, particularly in matters of guardianship, adoption and maintenance. Such inconsistencies challenge the principle of uniform protection of juvenile rights and raise concerns regarding discrimination and unequal access to justice.

The study adopts a rights-based approach, drawing upon international instruments such as the United Nations Convention on the Rights of the Child (UNCRC), which emphasizes non-discrimination, the best interests of the child and the right to development. Judicial interpretation and constitutional morality form an integral part of this framework, as courts have repeatedly prioritized child welfare over rigid adherence to personal laws. By integrating constitutional principles, statutory provisions and international norms, the conceptual framework highlights the potential of a child-centric Uniform Civil Code to harmonize personal laws with juvenile justice objectives.

Overall, this framework provides an analytical lens to examine how the alignment of the Uniform Civil Code with juvenile justice principles can strengthen the protection of child rights, ensure legal certainty and promote equality and justice for children across diverse social and religious contexts in India.

## HISTORICAL PERSPECTIVE OF UNIFORM CIVIL CODE AND JUVENILE JUSTICE IN INDIA

The historical evolution of the Uniform Civil Code and juvenile justice in India reflects the complex interaction between colonial legal policies, social reform movements and post-independence constitutional ideals. During the colonial period, British administrators introduced uniform criminal laws while deliberately retaining diversity in civil and personal laws, particularly in matters relating to family and religion. This policy of non-interference in personal laws resulted in differential treatment of individuals, including children, based on religious affiliations. At the same time, early child protection measures were largely punitive in nature, focusing more on control and correction rather than welfare and rehabilitation.

In the late nineteenth and early twentieth centuries, social reform movements began to challenge discriminatory personal law practices, especially those affecting women and children. Legislative interventions such as the Child Marriage Restraint Act, 1929 and reforms in guardianship and adoption laws marked early attempts to protect children's interests across communities. These developments laid the foundation for a more rights-oriented approach to child welfare, although a comprehensive juvenile justice framework was still absent.

The framing of the Indian Constitution marked a significant shift in the legal landscape. The inclusion of Article 44 in the Directive Principles of State Policy reflected the constitutional vision of a Uniform Civil Code aimed at promoting equality and national integration. Simultaneously, constitutional guarantees under Articles 14, 15, 21 and 39 emphasized the protection, development and welfare of children. Post-independence, the evolution of juvenile justice laws—from the Children Acts of various states to the Juvenile Justice Act, 1986, and later the Juvenile Justice (Care and Protection of Children) Act, 2000 and 2015—demonstrated a gradual shift towards a child-centric, rehabilitative and rights-based framework.

Despite these developments, personal laws governing family relations continued to influence the lives of children in areas such as guardianship, adoption and maintenance. The coexistence of evolving juvenile justice legislation with non-uniform personal laws created legal inconsistencies affecting child rights. Judicial interventions in the post-independence era increasingly emphasized the welfare and best interests of the child, often prioritizing constitutional values over rigid personal law norms. International commitments, particularly India's ratification of the United Nations Convention on the Rights of the Child in 1992, further

strengthened the rights-based approach to juvenile justice.

Overall, the historical trajectory of the Uniform Civil Code and juvenile justice in India reveals a gradual but incomplete movement towards uniformity and child rights protection. While juvenile justice laws have evolved significantly in line with constitutional and international standards, the absence of a Uniform Civil Code continues to reflect historical tensions between legal pluralism and the constitutional goal of equality. This historical perspective underscores the need for harmonizing personal laws with juvenile justice principles to ensure consistent and effective protection of children's rights in India.

### **CONSTITUTIONAL AND LEGAL FRAMEWORK**

The constitutional and legal framework governing the Uniform Civil Code and juvenile justice in India is rooted in the principles of equality, non-discrimination and protection of child rights. The Constitution of India envisages a balance between legal uniformity and respect for diversity, while simultaneously prioritizing the welfare of children as a fundamental constitutional obligation. Article 44 of the Constitution, enshrined under the Directive Principles of State Policy, mandates the State to endeavor to secure a Uniform Civil Code for its citizens, with the objective of promoting equality and national integration in civil matters.

Fundamental Rights under Articles 14 and 15 guarantee equality before law and prohibit discrimination on grounds of religion, caste, sex or place of birth, thereby laying the constitutional foundation for uniform protection of children's rights. Article 21, as expansively interpreted by the judiciary, encompasses the right to life with dignity, which includes the right to care, protection and development of children. Further, Article 15(3) and Article 15(4) empower the State to make special provisions for women and children, while Article 39(e) and (f) under the Directive Principles emphasize the protection of children from abuse, exploitation and moral abandonment.

The statutory framework for juvenile justice is primarily governed by the Juvenile Justice (Care and Protection of Children) Act, 2015, which adopts a rights-based and child-centric approach consistent with constitutional mandates and international standards. The Act focuses on rehabilitation, social reintegration and the best interests of the child, distinguishing children in conflict with law from children in need of care and protection. Complementary legislations such as the Protection of Children from Sexual Offenses Act, 2012 and the Guardians and

Wards Act, 1890 further contribute to the legal regime aimed at safeguarding child rights.

Despite the existence of a robust juvenile justice framework, personal laws governing marriage, guardianship, adoption and maintenance continue to operate in parallel, leading to differential legal outcomes for children belonging to different religious communities. This coexistence of statutory child protection laws and non-uniform personal laws raises constitutional concerns regarding equality and uniform application of child rights. Judicial interpretation has played a crucial role in addressing these concerns by harmonizing personal laws with constitutional values and prioritizing child welfare over rigid legal formalism.

Overall, the constitutional and legal framework reflects a strong commitment to child rights and welfare yet reveals inherent tensions arising from legal pluralism. The effective realization of juvenile justice objectives necessitates greater harmonization between personal laws and constitutional mandates, reinforcing the relevance of a child-centric approach to the Uniform Civil Code within the Indian legal system.

### **REVIEW OF LITERATURE**

The discourse on the Uniform Civil Code (UCC) in India has been extensively examined by scholars from constitutional, sociological and feminist perspectives. Early constitutional scholars such as Baxi and Agnes have emphasized the role of the UCC in promoting equality before law and advancing constitutional morality, while simultaneously acknowledging the socio-cultural and religious sensitivities associated with its implementation. These studies primarily focus on issues of gender justice and secularism, with limited engagement on the specific implications of the UCC for children and juveniles.

In contrast, the field of juvenile justice has attracted significant scholarly attention, particularly following legislative reforms culminating in the Juvenile Justice (Care and Protection of Children) Act, 2015. Scholars including Bajpai and Saxena have traced the evolution of juvenile justice laws in India, highlighting the transition from a punitive framework to a rehabilitative and rights-based approach. Their works emphasize child-friendly procedures, institutional mechanisms and the principle of the best interests of the child. However, this body of literature largely examines juvenile justice in isolation, without adequately addressing the influence of personal laws and the absence of a Uniform Civil Code on the realization of juvenile rights.

Studies on personal laws and family law further reveal disparities in the treatment of children across religious communities, particularly in matters of guardianship, adoption, maintenance and custody. Legal scholars have analyzed Hindu, Muslim, Christian and Parsi personal laws to demonstrate the persistence of legal pluralism in civil matters. While these studies provide valuable insights into family law regimes, they often fail to integrate juvenile justice principles or constitutional child rights standards into their analysis.

From an international and comparative perspective, scholars have emphasized the importance of uniform child protection standards under instruments such as the United Nations Convention on the Rights of the Child (UNCRC). Comparative legal studies suggest that jurisdictions with uniform civil frameworks tend to offer more consistent protection of children's rights. Nevertheless, there remains a paucity of research applying these international insights to the Indian context, particularly in relation to the interface between the UCC and juvenile justice.

Overall, the existing literature reveals a fragmented approach, wherein debates on the Uniform Civil Code and juvenile justice operate in parallel rather than in convergence. The lack of integrated, rights-based and historical analyzes underscores the need for comprehensive research that examines how the absence of a Uniform Civil Code impacts juvenile justice and child rights in India. This study seeks to address this gap by synthesizing constitutional, legal and child-centric perspectives.

## **JUVENILE JUSTICE AND CHILD RIGHTS: A RIGHTS-BASED ANALYSIS**

A rights-based approach to juvenile justice places children at the center of the legal framework, recognizing them as independent rights-holders rather than mere subjects of welfare or parental authority. In India, this approach is constitutionally grounded in Articles 14, 15 and 21, which guarantee equality, non-discrimination and the right to life with dignity. The juvenile justice system, particularly under the Juvenile Justice (Care and Protection of Children) Act, 2015, reflects this paradigm shift by emphasizing rehabilitation, social reintegration and the best interests of the child over punitive measures.

Child rights within the juvenile justice framework encompass the right to care and protection, the right to a fair and child-friendly procedure, the right to development and the right to be heard in matters affecting the child. These rights are further reinforced by international

commitments, notably the United Nations Convention on the Rights of the Child (UNCRC), which India ratified in 1992. The principles of non-discrimination, best interests of the child, survival and development, and participation form the core of a rights-based juvenile justice system.

However, the realization of these rights is often influenced by the operation of personal laws governing family relations. Issues such as guardianship, adoption, maintenance and custody directly affect a child's access to care and protection. The absence of a Uniform Civil Code results in varied legal standards for children belonging to different religious communities, potentially undermining the principle of equality. This legal pluralism poses challenges to the uniform application of child rights, particularly when personal law norms conflict with constitutional guarantees and statutory juvenile justice provisions.

Judicial interpretation has played a significant role in reinforcing a rights-based approach by prioritizing child welfare and constitutional values over rigid adherence to personal laws. Courts have consistently emphasized that the best interests of the child must prevail in all matters concerning children, thereby attempting to bridge gaps created by non-uniform civil laws. Nevertheless, reliance on judicial intervention alone may not ensure consistent protection of child rights across all cases.

From a rights-based perspective, the harmonization of personal laws with juvenile justice principles is essential to ensure uniformity, dignity and justice for children. A child-centric approach to the Uniform Civil Code has the potential to eliminate discriminatory practices, strengthen legal certainty and enhance the effectiveness of the juvenile justice system. By aligning civil laws with constitutional mandates and international child rights standards, the legal framework can better safeguard the rights and well-being of all children, irrespective of their religious or social background.

## **JUDICIAL INTERPRETATION AND CASE LAW ANALYSIS**

Judicial interpretation has played a pivotal role in shaping the discourse on the Uniform Civil Code and juvenile justice in India, particularly in reconciling personal laws with constitutional mandates and child rights principles. In the absence of a Uniform Civil Code, courts have often acted as mediators by prioritizing constitutional values such as equality, dignity and the best interests of the child over rigid personal law norms. Through progressive interpretation, the

judiciary has sought to ensure that children receive uniform protection regardless of religious affiliation.

In *Mohd. Ahmed Khan v. Shah Bano Begum*, the Supreme Court emphasized the need for a Uniform Civil Code to promote national integration and equality, indirectly highlighting the broader implications of non-uniform personal laws on vulnerable groups, including children. Similarly, in *Sarla Muggal v. Union of India*, the Court reiterated the constitutional vision of Article 44 and underlined the inconsistencies arising from legal pluralism in civil matters. While these cases primarily addressed issues relating to marriage and maintenance, their observations remain relevant to child rights and juvenile justice, as they expose the discriminatory consequences of fragmented civil laws.

In matters directly concerning children, judicial decisions have consistently prioritized child welfare and the best interests of the child. In *Sheela Barse v. Union of India*, the Supreme Court laid down significant guidelines to protect the rights of children in conflict with law, emphasizing humane treatment, legal representation and rehabilitation. The Court's approach reflected a shift from a punitive to a rights-based juvenile justice system. Similarly, in *Gaurav Jain v. Union of India*, the Court recognized the rights of children of sex workers and directed the State to ensure their rehabilitation and social integration, reinforcing the principle of non-discrimination.

Judicial interpretation of Article 21 has further expanded the scope of child rights by recognizing the right to live with dignity, education and development. In cases involving custody and guardianship, courts have repeatedly held that the welfare of the child is of paramount consideration, often transcending personal law constraints. This judicial trend demonstrates an implicit movement toward uniform child protection standards, even in the absence of a formal Uniform Civil Code.

However, reliance on judicial activism alone presents limitations, as judicial interventions are case-specific and may not ensure consistent application of child rights across jurisdictions. The judiciary's role, while crucial, underscores the need for comprehensive legislative reform to harmonize personal laws with juvenile justice principles. Overall, judicial interpretation and case law analysis reveal the courts' commitment to child-centric justice and constitutional morality, reinforcing the argument that a rights-based and uniform civil framework can

strengthen juvenile justice and ensure equal protection of children's rights in India.

## **CHALLENGES AND ISSUES IN HARMONIZING UCC AND JUVENILE JUSTICE**

The harmonization of the Uniform Civil Code (UCC) with the juvenile justice system in India presents a range of legal, social and institutional challenges. One of the foremost issues arises from the coexistence of diverse personal laws governing family relations, which often lead to differential treatment of children across religious communities. Matters such as guardianship, adoption, maintenance and custody are regulated by religiously distinct norms, creating inconsistencies that undermine the principle of equal protection of juvenile rights under the law.

Socio-cultural and religious sensitivities constitute another significant challenge in advancing the UCC, particularly when reforms are perceived as encroachments on religious freedom and cultural autonomy. Resistance to uniformity in civil laws often overshadows the child-centric objectives of juvenile justice, resulting in policy debates that prioritize identity-based concerns over the best interests of the child. This tension complicates efforts to integrate juvenile justice principles with a uniform civil framework.

Institutional and administrative challenges further impede effective harmonisation. Despite progressive legislation, the juvenile justice system faces issues such as inadequate infrastructure, lack of trained personnel, procedural delays and uneven implementation across states. These limitations weaken the enforcement of child rights and reduce the impact of legal safeguards intended to protect juveniles. The absence of coordinated mechanisms between family law institutions and juvenile justice authorities exacerbates these challenges.

Legal ambiguity and fragmented judicial interpretations also pose concerns. While courts have consistently emphasized child welfare and constitutional values, judicial decisions remain case-specific and may lead to uncertainty in the absence of comprehensive legislative reform. Furthermore, the lack of empirical data assessing the impact of legal pluralism on juvenile justice outcomes restricts evidence-based policymaking and reform initiatives.

Overall, these challenges highlight the complexities involved in reconciling the constitutional vision of the Uniform Civil Code with the objectives of juvenile justice. Addressing these

issues requires a balanced, rights-based and child-centric approach that respects diversity while ensuring uniform and effective protection of children's rights across India.

## **FINDINGS, RECOMMENDATIONS AND CONCLUSION**

The study finds that the absence of a Uniform Civil Code has a direct bearing on the uniform realization of juvenile rights in India. While the juvenile justice framework, particularly under the Juvenile Justice (Care and Protection of Children) Act, 2015, adopts a rights-based and child-centric approach, the continued operation of diverse personal laws results in differential legal treatment of children in matters such as guardianship, adoption, maintenance and custody. The findings further reveal that constitutional provisions and judicial interpretations consistently emphasize the best interests of the child, indicating an implicit judicial effort to harmonize personal laws with constitutional values. However, reliance on judicial intervention alone has led to fragmented and case-specific outcomes rather than comprehensive uniformity.

Based on these findings, the study recommends that any move towards implementing a Uniform Civil Code should be guided by a child-centric and rights-based framework. Legislative reforms must prioritize the welfare, dignity and equality of children over religious or customary considerations that adversely affect child rights. Harmonization of personal laws with the objectives of juvenile justice legislation is essential to ensure legal certainty and consistent protection of children across communities. Further, capacity-building of juvenile justice institutions, including training of judicial officers, child welfare committees and law enforcement agencies, is necessary for effective implementation. Policymakers should also draw upon international child rights standards, particularly the United Nations Convention on the Rights of the Child, to inform uniform and inclusive reforms.

In conclusion, the study underscores that aligning the constitutional vision of the Uniform Civil Code with juvenile justice principles can significantly strengthen child rights protection in India. A balanced approach that respects cultural diversity while prioritizing the best interests of the child is essential to achieve equality, dignity and justice for all children. Integrating juvenile justice objectives with a child-centric Uniform Civil Code holds the potential to create a more coherent, equitable and effective legal framework, ensuring uniform protection of juvenile rights in a pluralistic society.

## REFERENCES

1. The Constitution of India, 1950.
2. The Juvenile Justice (Care and Protection of Children) Act, 2015.
3. The Protection of Children from Sexual Offences Act, 2012.
4. The Guardians and Wards Act, 1890.
5. Law Commission of India, *Consultation Paper on Reform of Family Law*, 2018.
6. Baxi, U. (2007), *Human Rights in a Posthuman World*.
7. Agnes, F. (2011), *Family Law and Constitutional Claims*.
8. Bajpai, A. (2018), *Child Rights in India: Law, Policy and Practice*.
9. Saxena, S. (2016), "Juvenile Justice System in India: A Critical Analysis," *Journal of Indian Law and Society*.
10. Mehta, P. B. (2019), "Uniform Civil Code and Constitutional Morality," *Indian Journal of Constitutional Law*.
11. Diwan, P. (2019), *Family Law*.
12. Diwan, P. and Diwan, P. (2020), *Modern Hindu Law*.
13. Mahmood, T. (2013), *Personal Laws in Crisis*.
14. Agnes, F. (2015), "Pluralism and Equality in Family Law," *Economic and Political Weekly*.
15. UNICEF (2015), *Child Protection Systems in South Asia*.
16. United Nations (1989), *Convention on the Rights of the Child*.
17. *Mohd. Ahmed Khan v. Shah Bano Begum*, AIR 1985 SC 945.
18. *Sarla Mudgal v. Union of India*, AIR 1995 SC 1531.
19. *Sheela Barse v. Union of India*, AIR 1986 SC 1773.
20. *Gaurav Jain v. Union of India*, (1997) 8 SCC 114.
21. *Nil Ratan Kundu v. Abhijit Kundu*, (2008) 9 SCC 413.
22. *ABC v. State (NCT of Delhi)*, (2015) 10 SCC 1.
23. National Commission for Protection of Child Rights, Annual Reports (2016–2022).
24. Ministry of Women and Child Development, Government of India, Annual Reports (2017–2023).
25. Law Commission of India, 21st Report on Reform of Family Law.
26. Austin, G. (2014), *The Indian Constitution: Cornerstone of a Nation*.
27. Basu, D. D. (2020), *Introduction to the Constitution of India*.
28. Freeman, M. (2011), *Children's Rights: A Comparative Perspective*.

29. Eekelaar, J. (2017), “Best Interests of the Child,” *International Journal of Law, Policy and the Family*.
30. Comparative constitutional and international human rights studies on child rights and civil law uniformity published in leading family law and human rights journals.

