

Access to justice for victims of crime and the role of legal services authorities in Rajasthan

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Abstract: Access to justice for a victim of crime is wider than access to a courtroom. It includes reliable information, respectful treatment, legal assistance, protection, participation, timely compensation and support for recovery. India has created a substantial institutional framework for these purposes through the Constitution, the Legal Services Authorities Act, 1987, criminal procedure, special legislation and judicial decisions. In Rajasthan, the Rajasthan State Legal Services Authority and District Legal Services Authorities occupy a distinctive position because they can connect victims with courts, police, hospitals, lawyers and welfare services. This article evaluates that institutional role through doctrinal and policy analysis. It examines the constitutional basis of victim-oriented legal aid, the statutory responsibilities of legal services institutions, the victim compensation framework now continued under section 396 of the Bharatiya Nagarik Suraksha Sanhita, 2023, and the practical barriers that arise between a formal entitlement and its use. The analysis identifies recurring risks: victims may receive information too late, documentary demands may be repeated, institutional referrals may remain informal, interim assistance may not match immediate need, and compensation may be treated as the end of rehabilitation. The article proposes a service model based on early contact, assisted applications, designated case responsibility, reasoned decisions, time-sensitive interim relief, secure digital coordination and voluntary follow-up. It concludes that Legal Services Authorities should be evaluated not only by the number of applications or awards processed, but by whether a victim can move through the justice system without avoidable confusion, delay or secondary victimization.

Keywords: Access to Justice, Victims of Crime, Legal Aid, RSLSA, DLSA, Victim Compensation, Section 396 BNSS, Rehabilitation, Restorative Justice, Rajasthan

1. INTRODUCTION ACCESS TO JUSTICE FROM THE VICTIM PERSPECTIVE

A criminal offence can alter an ordinary life within minutes. A person may require medical treatment, lose wages, leave a shared home, face pressure from relatives, or struggle to understand what the police and courts expect. The criminal case then develops according to institutional schedules that rarely correspond with the victim's immediate needs. If the legal system treats the victim only as a source of evidence, the person may remain formally included

but practically unsupported. Access to justice must therefore be judged from the point at which the victim first seeks help, not only from the date on which a court finally decides the case.

Indian criminal procedure historically concentrated on State prosecution and the rights of the accused. Those concerns remain indispensable to a fair trial, but they do not exhaust the demands of justice. A victim may need accurate information about the case, assistance in approaching authorities, protection from intimidation, representation where the law permits, compensation, counselling and rehabilitation. Each need may arise before conviction and may continue after the trial. A victim-oriented framework does not weaken due process; it makes the system more capable of responding to the harm that gave rise to the proceeding.

Legal Services Authorities are central to this wider understanding. The National Legal Services Authority, State Legal Services Authorities, District Legal Services Authorities and Taluk Legal Services Committees form a statutory network intended to make justice accessible to persons who cannot effectively navigate it alone. In Rajasthan, RLSA and the DLSAs can operate at the intersection of legal advice, court processes, victim compensation and social support. Their comparative advantage lies in institutional reach and their ability to coordinate services that no single department can deliver.

This article asks whether the existing framework enables Legal Services Authorities to function as effective gateways to justice for victims in Rajasthan. It uses doctrinal analysis of constitutional provisions, legislation, schemes and judicial decisions, combined with a policy assessment of the victim's likely institutional journey. The discussion does not claim district-level empirical findings where verified data are unavailable. Instead, it identifies implementation risks inherent in fragmented systems and proposes standards by which performance can be measured through future research.

The inquiry adopts a functional meaning of effectiveness. A provision is effective when the intended beneficiary can discover it, satisfy reasonable requirements, receive a decision in time and use the resulting assistance for its stated purpose. This approach avoids equating legal validity with practical success. It also prevents aggregate expenditure from becoming the sole measure of performance. A large disbursement may coexist with delayed individual cases, while a modest financial award may have substantial value when combined promptly with treatment, shelter and legal guidance.

2. CONSTITUTIONAL MEANING OF EQUAL AND EFFECTIVE JUSTICE

The constitutional basis of victim assistance emerges from the combined force of equality, dignity and equal access to legal remedies. Article 14 requires equal protection of the laws and restrains arbitrary administration. A scheme may use uniform eligibility criteria, yet produce unequal results if applicants in one district receive clear assistance while similarly situated persons elsewhere encounter repeated visits and unexplained delay. Equality in this context concerns the real ability to use a remedy, not merely the presence of identical words in a notification.

Article 21 protects life and personal liberty through a procedure that must be fair, just and reasonable. Judicial interpretation has connected the provision with dignity, bodily integrity, privacy and meaningful remedies. Crime can damage each of these interests, while insensitive investigation or public disclosure can deepen the injury. The State is not automatically liable for every private offence, but once law establishes institutions for legal aid and compensation, those institutions must act fairly and within a reasonable time. An unexplained administrative delay can deprive a lawful remedy of much of its rehabilitative value.

Article 39-A directs the State to ensure that the legal system promotes justice on the basis of equal opportunity and to provide free legal aid so that economic or other disabilities do not deny justice. The reference to other disabilities is especially important for victims. Trauma, social control, illiteracy, age, disability, migration, geographical distance and dependence upon the accused may all limit a person's ability to use legal procedures. A victim who qualifies for assistance should not be expected to diagnose the correct legal route before receiving help.

Constitutional compensation decisions also demonstrate that monetary relief may form part of an effective public remedy. In *Rudul Sah v State of Bihar* and *Nilabati Behera v State of Orissa*, the Supreme Court recognized compensation in public law for grave violations of fundamental rights. These judgments address State wrongdoing and are distinct from statutory victim compensation, but they establish a broader principle: rights require remedies capable of responding to actual injury. For Legal Services Authorities, this principle supports procedures that are understandable, reasoned and sensitive to urgent need.

3. LEGAL SERVICES AUTHORITIES AS INSTITUTIONS OF ACCESS

The Legal Services Authorities Act, 1987 converted the constitutional commitment to legal aid into an organized national structure. NALSA frames policies and schemes, State Authorities implement legal services within their jurisdictions, District Authorities coordinate activities at district level, and Taluk Committees extend access below the district headquarters. The structure matters because many victims first encounter the justice system locally. A distant State office cannot replace a district institution that can speak with a police station, hospital, court or protection officer.

Free legal services should not be reduced to appointment of an advocate after litigation has begun. For a victim, useful assistance may include explaining the criminal process, identifying available remedies, preparing an application, obtaining a copy of an order, making an urgent representation, facilitating compensation, or connecting the person with a shelter and counsellor. Legal advice is valuable when it arrives early enough to shape decisions. Advice delivered after limitation, relocation or medical crises have already occurred may be technically correct but practically inadequate.

Section 12 of the 1987 Act identifies categories entitled to legal services, including women, children, members of Scheduled Castes and Scheduled Tribes, persons with disabilities, persons in custody and persons whose income falls below the prescribed limit. Many crime victims fall within one or more categories, but eligibility should be explained rather than assumed. Frontline personnel must recognize intersecting vulnerabilities. A child from a marginalized community, for example, may require child-sensitive communication, disability accommodation, privacy safeguards and assistance for a non-literate caregiver.

The statutory network also has an educational function. Legal literacy should tell people what to do at the moment a need arises. General seminars have value, but victim-oriented communication should answer practical questions: where an application may be filed, whether conviction is required, what documents are ordinarily needed, how urgent assistance can be requested, and whom to contact if no response is received. Information should be available in Hindi, accessible formats and local communication channels, with an oral explanation where literacy or disability makes a written notice insufficient.

4.VICTIMS AS RIGHTS BEARERS IN CRIMINAL PROCEDURE

The movement from witness-centred treatment to recognition of victims as rights bearers has occurred through legislation and judicial interpretation. The criminal process still belongs to the State in important respects, yet victims now possess interests in information, participation, protection and reparation. These interests arise at different stages. At registration and investigation, the victim needs respectful reception, medical assistance and information. During trial, privacy, protection and intelligible updates become important. At sentencing and afterward, compensation and rehabilitation require attention.

The Supreme Court's decisions have repeatedly exposed the cost of ignoring the victim. *Delhi Domestic Working Women's Forum v Union of India* emphasized legal assistance and compensatory support for survivors of sexual violence. *Bodhisattwa Gautam v Subhra Chakraborty* recognised the relevance of interim compensation. *Ankush Shivaji Gaikwad v State of Maharashtra* treated judicial consideration of compensation under section 357 of the Code of Criminal Procedure as a duty requiring application of mind. *Suresh v State of Haryana* reinforced attention to compensation at an early stage.

Cases involving acid attacks and sexual violence further show that money cannot be isolated from treatment and dignity. *Laxmi v Union of India* connected compensation with medical response and broader protective directions. *Nipun Saxena v Union of India* contributed to national standards for women victims and survivors of sexual assault and other crimes. These authorities support an integrated approach in which confidentiality, healthcare, counselling, legal assistance and financial relief work together.

Victim participation must remain compatible with a fair trial and the presumption of innocence. Assistance should not depend on officials treating an allegation as proven before adjudication. At the same time, the standard for urgent support need not reproduce the criminal standard of proof. A person may require medical care, shelter or interim financial assistance while investigation continues. Legal Services Authorities must distinguish rehabilitative assessment from adjudication of guilt and explain this distinction to applicants and other agencies.

5. VICTIM COMPENSATION UNDER THE BNSS AND STATE SCHEMES

The earlier Code of Criminal Procedure contained two related compensation routes. Section 357 allowed a criminal court to direct compensation from a fine and, in appropriate cases, even where fine was not part of the sentence. This route remained connected with conviction, judicial consideration and the offender's capacity to pay. Section 357-A, inserted through the 2008 amendment, required State Governments, in coordination with the Central Government, to prepare schemes for compensating victims or dependents who suffered loss or injury and required rehabilitation.

Section 357-A broadened the institutional basis of compensation. The District or State Legal Services Authority could determine compensation on a court recommendation. Relief could also be considered where the offender was not traced or identified and no trial occurred. The provision permitted immediate first aid, medical benefits or other interim relief. Its design acknowledged a simple reality: the need for recovery may exist even when offender-funded compensation is unavailable or the criminal case has not produced a conviction.

The Bharatiya Nagarik Suraksha Sanhita, 2023, in force from 1st July 2024, continues the victim compensation framework in section 396. Current forms, training material and academic writing should use the new statutory reference while recognizing that decisions under section 357-A remain relevant to the interpretation of the continued scheme. Transition requires more than replacing a section number. Officials must understand which procedures, court references and administrative responsibilities continue and how pending matters are to be handled.

The Rajasthan Victim Compensation Scheme gives operational content to this statutory obligation. Its effectiveness depends on the relationship among scheduled amounts, individual assessment, interim relief and other statutory benefits. A schedule promotes consistency but cannot describe every consequence of injury. Authorities should consider treatment expenses, loss of income, disability, education, care responsibilities, psychological harm and future rehabilitation within the limits of the governing scheme. Every determination should state the material considered and the reasons for the amount awarded.

6. THE INSTITUTIONAL JOURNEY OF A VICTIM IN RAJASTHAN

A victim's route through public institutions rarely begins at a Legal Services Authority. The first contact may be a police station, hospital, One Stop Centre, child welfare institution, court,

protection officer or local administration. Each institution holds part of the information required for legal aid or compensation. Without a referral protocol, the victim becomes the messenger between offices. The person may carry medical papers to the police, obtain court records for the DLSA and return repeatedly for verification that the State could arrange internally.

An effective journey should begin with notice and referral. When a serious offence or visible vulnerability is recorded, the first institution should provide a short explanation of legal aid and compensation in an appropriate language. With the victim's consent and suitable privacy safeguards, it should transmit essential referral information to the DLSA. The referral should not decide eligibility; it should ensure that the person receives a timely opportunity to understand available assistance.

The DLSA should then assign a contact person who can explain the process, identify urgent needs and coordinate documents. A single point of contact reduces the burden of retelling traumatic events. The official need not personally deliver every service, but should know which office is responsible and whether the referral was completed. Case responsibility should continue until a reasoned decision is communicated and any sanctioned payment is actually received.

District access is particularly important in Rajasthan because distance, transport costs and uneven digital connectivity can determine whether a remedy is usable. Online applications and status tracking can reduce travel, but digital access should supplement rather than replace assisted and offline routes. Para-legal volunteers and legal aid clinics can help bridge local distance when trained to protect confidentiality, avoid unauthorized assurances and refer complex questions to qualified legal personnel.

The journey should also account for mobility. A victim may return to a parental home, move for safety, or obtain treatment in another district. Administrative responsibility should not become uncertain merely because residence, place of occurrence and place of treatment differ. RSLSA can issue guidance on transfer, joint coordination and continuity of contact so that relocation does not force a new application or repetition of sensitive facts. The file should move securely between competent authorities, while the applicant receives a clear explanation of who is presently responsible.

7. INFORMATION LEGAL ADVICE AND MEANINGFUL PARTICIPATION

A person cannot exercise a right that remains unknown. Victims may believe that compensation is available only after conviction, that legal aid is confined to accused persons, or that a private lawyer is compulsory. Some may fear that seeking compensation will weaken the prosecution or expose personal information. Legal Services Authorities should provide clear explanations at the beginning of contact and correct misconceptions without promising a particular result.

Information should be stage-specific. At the investigation stage, the victim may need to know about medical examination, preservation of records, protection and immediate relief. During trial, the person may need updates, help understanding summonses, privacy safeguards and information about a compensation recommendation. After an order, assistance may be required to supply bank details, resolve payment barriers, seek review where permitted or access linked rehabilitation services. Repeating a general brochure at each stage is less useful than answering the decision currently facing the person.

Meaningful participation requires an opportunity to describe harm that official records may not capture. A medical certificate records injury but may omit lost employment, displacement, interrupted education, unpaid care and continuing fear. An applicant should be able to explain these consequences in a non-adversarial setting. Where an authority doubts a fact or document, it should identify the concern and allow a reasonable response before denying or reducing relief.

Confidentiality is essential in cases involving sexual offences, children, trafficking, domestic abuse and other sensitive circumstances. Information sharing should be limited to what is necessary for the service requested. Digital systems require role-based access, secure transmission and an audit trail. Public performance reporting should use aggregate and anonymized data. Transparency about institutional performance does not require disclosure of a victim's identity or personal history.

8. TIMELINESS INTERIM RELIEF AND PROCEDURAL FAIRNESS

Time changes the value of assistance. Medical expenses, rent, food and transport cannot wait for the conclusion of a criminal trial. A survivor may borrow at high interest or discontinue treatment while an application remains pending. Compensation paid years later may reimburse

part of the loss but cannot reverse the debt, interrupted education or unsafe living conditions caused by delay. Timeliness is therefore part of the substance of victim assistance.

Interim relief requires a simplified assessment focused on immediate need. A preliminary police report, medical record or other credible material may be sufficient for an urgent decision, subject to later verification under the scheme. Authorities should not postpone all assistance until every long-term consequence is documented. The interim order should state its purpose, the material relied upon and the steps that remain for final assessment.

Final decisions also require stage-wise management. The system should record the date of referral, first contact, receipt of the application, requests for reports, interim decision, hearing, final order and disbursement. Recording only the final disposal date conceals periods during which the file remained inactive. Defined responsibility and automated reminders can identify delay without encouraging superficial disposal.

Procedural fairness requires notice, opportunity and reasons. If a report is missing because another public agency failed to supply it, the victim should not automatically bear the consequence. The DLSA should obtain the record directly where legally possible and decide on available material when appropriate. A speaking order supports consistency, permits review and assures the applicant that individual circumstances were considered. A simple grievance channel should allow prolonged inaction or communication failure to be reported without immediate constitutional litigation.

9.COMPENSATION AS PART OF REHABILITATION

Compensation is important, but a payment alone is not rehabilitation. A victim may require surgery, physiotherapy, counselling, assistive devices, safe accommodation, schooling, skill development or help returning to work. If the award is consumed by existing debt while services remain unavailable, the formal claim may be closed even though recovery has barely begun. Legal Services Authorities should therefore treat compensation as one component of a coordinated response.

Assessment should distinguish direct expenditure, economic loss and non-economic injury. Direct expenditure may include treatment, medicines, transport and accommodation. Economic loss may involve wages, employment, business, education or care responsibilities. Pain, trauma, loss of autonomy and social isolation resist exact monetary measurement but

remain relevant to rehabilitation. The authority must apply the governing schedule faithfully while explaining how the available factors affected its decision.

Compensation norms should be reviewed periodically because inflation and healthcare costs reduce the real value of fixed amounts. Review should draw upon decided cases, treatment costs, wage indicators and the experience of victim-support institutions. Exceptional cases need a transparent route for enhanced consideration where the governing framework permits it. Consistency does not require identical awards for persons whose actual consequences differ.

RSLSA and DLSAs should maintain current referral arrangements with health, social justice, women and child development, disability, labour, education and skill-development bodies. Referral should be purposeful: the receiving office, service and contact point should be identified, and completion should be checked with the victim's consent. Voluntary follow-up after payment can reveal whether the money reached the beneficiary and whether a promised service was available. Follow-up must support autonomy and must not become surveillance.

10. BARRIERS TO EFFECTIVE DELIVERY IN RAJASTHAN

The first barrier is fragmented responsibility. Police, hospitals, prosecutors, courts, Legal Services Authorities and welfare departments may each perform a legitimate function, but the combined process can remain incoherent. Repeated verification and uncertainty about who must act next create delay. A written inter-agency protocol should identify referral triggers, documents to be exchanged, response periods and an escalation point for unresolved requests.

The second barrier is unequal awareness. Access may depend upon whether an individual officer, lawyer or volunteer knows the scheme and takes initiative. This produces geographical variation unrelated to the victim's legal entitlement. Automatic information and referral for defined categories of serious harm can reduce dependence on chance. Awareness work should also reach rural communities, educational institutions, hospitals and organizations supporting women, children, persons with disabilities and marginalized groups.

The third barrier is administrative capacity. DLSAs perform many functions, including legal aid, Lok Adalats, outreach and implementation of national schemes. Victim assistance requires specialized knowledge, sensitive communication, financial processing and sustained coordination. Without designated staff and training, conscientious officials may still struggle

to provide consistent service. Training should include current criminal law, scheme procedure, trauma-sensitive interaction, disability accommodation, privacy and reasoned assessment.

The fourth barrier is limited evidence about outcomes. Total applications and sanctioned amounts do not reveal whether assistance was timely, geographically equitable or sufficient for identified needs. Rajasthan needs district-wise, anonymized information on referrals, applications, interim orders, final decisions, rejection grounds, processing time and actual disbursement. Quantitative data should be complemented by confidential victim feedback and periodic file audits. The purpose is institutional learning, not ranking districts without regard to caseload and local conditions.

A fifth barrier arises when institutional language obscures responsibility. Terms such as pending verification or awaiting report may describe a file but do not tell the applicant which office must act, what information is missing or when the next review will occur. Every pending status should therefore identify the required action, responsible authority and expected date. Clear communication does not eliminate substantive delay, but it allows the victim to respond to a genuine deficiency and enables supervisors to distinguish unavoidable inquiry from administrative inactivity.

11. TECHNOLOGY ACCOUNTABILITY AND HUMAN ASSISTANCE

Technology can remove avoidable movement of paper. A secure case-management system could assign a unique number, accept a referral, identify missing information, request reports, record decisions and track payment. Applicants could receive updates by SMS or another chosen channel. Supervisors could identify overdue stages and recurring bottlenecks. These functions support accountability because they make responsibility and time visible.

Digital design can also create exclusion. A victim may lack a smartphone, stable connectivity, digital literacy, identity documents or control over a bank account. Sensitive notifications may place a person at risk if a shared phone is used. Every digital service should therefore include assisted access, safe communication preferences and a non-digital alternative. Technology should reduce the victim's burden, not transfer clerical work to the applicant.

Data protection requires deliberate limits. A compensation file may contain medical details, addresses, bank information and facts about sexual or domestic violence. Access should be restricted according to role, and every viewing or transfer should be logged. Reports for public

accountability must remove identifying details. Data should be retained only for a lawful administrative purpose and handled consistently with applicable privacy principles.

Technology cannot replace explanation and professional judgment. An online portal may show that a report is pending, but a human official must decide whether the report is essential and what can be done without it. Automated checklists may improve consistency, yet should leave room for circumstances that the form did not anticipate. The best system combines reliable records with a named person who can listen, explain and act.

12. REFORM PRIORITIES FOR RSLSA AND DLSAS

The first reform priority is a common victim referral protocol. Police stations, hospitals, courts, One Stop Centres and relevant welfare institutions should provide standard information and transmit consent-based referrals for eligible or potentially eligible cases. The DLSA should acknowledge each referral and make early contact. A victim should remain free to decline assistance, but access should not depend on discovering the institution independently.

The second priority is an early needs assessment. A trained official should identify urgent medical, safety, housing, income, education, disability and counselling needs. The assessment should guide interim relief and referrals without requiring the victim to repeat the full narrative to every office. It should be updated when circumstances materially change. Standard fields can promote consistency, but the record must allow an individual explanation.

The third priority is a time-managed, reasoned decision process. Each stage should have a responsible officer and a visible timeline. Delayed reports should trigger reminders and escalation. Interim requests should receive separate priority from final assessment. Orders should record eligibility, relevant harm, material considered, other benefits adjusted where the scheme requires, the amount granted and reasons. Applicants should receive the order in accessible language with information about any available review.

The fourth priority is institutional accountability through measured outcomes. RSLSA should publish an annual anonymised report that distinguishes referrals, applications, interim assistance, final awards, rejection grounds, decision time and disbursement time by district. Periodic audits should examine whether files show notice, opportunity, reasons and rehabilitation referrals. Victim feedback should be voluntary, confidential and used to improve procedure.

The fifth priority is stable capacity. Dedicated personnel, recurring training, translation and interpretation support, accessible offices and dependable budgets are necessary. Para-legal volunteers can extend reach but require supervision and defined limits. Partnerships with universities and civil society may support awareness and research, while legal responsibility must remain with the statutory authorities.

These reforms should be introduced as a connected service model rather than isolated amendments. Faster processing without adequate reasons may produce error; digital filing without assisted access may exclude; higher compensation without early referral may reach too few people. The governing question should remain practical: can an eligible victim obtain understandable assistance, urgent support and a reasoned decision without avoidable institutional hardship?

Implementation can proceed through a monitored pilot in districts representing different geographical and administrative conditions. The pilot should establish a baseline, test the referral and needs-assessment formats, measure stage-wise time and record victim feedback. Independent academic evaluation can examine whether the reform reduces repeat visits and improves interim assistance without compromising verification. Lessons from the pilot should inform State-wide instructions, training and budget allocation. This gradual approach would allow RLSA to correct operational difficulties before standardising the model across Rajasthan.

13.CONCLUSION

Legal Services Authorities give constitutional access to justice an institutional form. For victims of crime, their role extends beyond arranging a lawyer. RLSA and the DLSAs can explain rights, assist applications, connect institutions, facilitate interim relief, determine compensation within the statutory framework and support access to rehabilitation. Their position between courts and public services enables them to reduce fragmentation that a victim cannot reasonably be expected to manage alone.

The legal foundation is substantial. Articles 14, 21 and 39-A, the Legal Services Authorities Act, victim compensation provisions now contained in section 396 of the BNSS, special legislation and judicial decisions together recognise that crime produces needs which

punishment alone does not answer. The principal challenge is converting these norms into a process that works at the time and place where assistance is required.

Rajasthan can strengthen this process through automatic information and consent-based referral, a named contact person, early needs assessment, separate priority for interim relief, reasoned orders, secure coordination, assisted digital access and voluntary follow-up. Public reporting should measure time, access and outcomes while preserving confidentiality. Periodic review of compensation norms and professional training should respond to changing costs and experience.

The ultimate measure of access to justice is the victim's ability to use the system with dignity. A file may be disposed of and an amount sanctioned, yet justice remains incomplete if the person was left uninformed, repeatedly sent between offices or assisted only after the crisis had passed. Legal Services Authorities fulfil their statutory purpose when they make legal protection understandable, timely and capable of supporting recovery.

References

1. The Constitution of India, Articles 14, 21 and 39-A.
2. The Legal Services Authorities Act, 1987.
3. The Code of Criminal Procedure, 1973, ss 357 and 357-A.
4. The Bharatiya Nagarik Suraksha Sanhita, 2023, s 396.
5. The Protection of Children from Sexual Offences Act, 2012 and applicable rules.
6. The Protection of Women from Domestic Violence Act, 2005.
7. The Scheduled Castes and Scheduled Tribes Prevention of Atrocities Act, 1989 and applicable rules.
8. Rajasthan Victim Compensation Scheme, as amended from time to time.
9. National Legal Services Authority, Compensation Scheme for Women Victims Survivors of Sexual Assault and Other Crimes, 2018, as amended.
10. Hussainara Khatoon v State of Bihar (1980) 1 SCC 81.

11. Rudul Sah v State of Bihar (1983) 4 SCC 141.
12. Nilabati Behera v State of Orissa (1993) 2 SCC 746.
13. Delhi Domestic Working Women's Forum v Union of India (1995) 1 SCC 14.
14. Bodhisattwa Gautam v Subhra Chakraborty (1996) 1 SCC 490.
15. Ankush Shivaji Gaikwad v State of Maharashtra (2013) 6 SCC 770.
16. Laxmi v Union of India (2014) 4 SCC 427.
17. Suresh v State of Haryana (2015) 2 SCC 227.
18. Nipun Saxena v Union of India (2019) 2 SCC 703.
19. Committee on Reforms of Criminal Justice System, Report (2003).
20. National Legal Services Authority, Manual for District Legal Services Authorities (2023).
21. National Legal Services Authority, annual reports and statistical publications.
22. Rajasthan State Legal Services Authority, annual reports and victim compensation materials.
23. National Crime Records Bureau, Crime in India, latest available edition.
24. United Nations, Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power (1985).
25. United Nations Office on Drugs and Crime, Handbook on Justice for Victims (1999).