



## PAINT IT PINK: GIRLS AND THE JUVENILE JUSTICE

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**Abstract:** *Gender differences not only have an effect on crime patterns, but also may have a significant impact on the way children are treated by the juvenile justice system. Available data show that globally delinquency has strong gender associations. Girls actually commit lesser crimes and fewer violent crimes. Girls and boys come in to contact with the justice system for similar reasons. Research shows that both tend to share lower socio-economic, disrupted family backgrounds and other difficult situations. However, the pathways girls take into the justice system differ from those of their male counterparts in the prevalence and type of trauma, family loss, physical and sexual abuse and victims of incest. Delinquent girls also differ from delinquent boys as they tend to be more relationship oriented and internalize responses to trauma differently. Girls more than boys are disadvantaged if their behaviour is viewed as morally incorrect. Across the world, the juvenile justice system was originally designed to deal with the problems of boys and in doing so neglected the gender-specific programming and treatment needs of girls. These differences require separate planning to meet the needs of girls enmeshed in a system designed to manage male population. It is in this backdrop that this paper while highlighting the features of girl delinquency attempts to voice a continuum of gender responsive programmes and practices to ensure that girls receive the attention and treatment they need.*

**Key Words:** *Juvenile justice, Delinquent girls, Double victimisation, Gender asymmetry, Hell holes.*

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The term juvenile justice emanates from the word *Juvenis*, which in Latin means young and hence a justice system for the young. The concept of juvenile justice was derived from the belief that the problems of juvenile delinquency and youth in abnormal situations are not amenable to resolution within the traditional processes of criminal laws. Juvenile justice was thus looked as administrating justice to minors who have/are alleged to have broken the law and about reforming a criminal justice system designed for adults to cater the age specificities and circumstances of children and youth. Over the years, increasingly a need is felt to ensure that the juvenile justice system is not designed to respond to the needs of young offender only but also provide specialised and preventive treatment services for children and young persons as a means of 'secondary prevention, rehabilitation and improved socialisation.' <http://www.haqcrc.org/sites/default/files/International%20Colloquium%20on%20Juvenile%20Justice%20-%20A%20Report.pdf>

While the juvenile justice system did not distinguish between girls and boys in terms of sentencing and services in its early development, however, difficult attitudes and perceptions regarding girls and boys over time can be discerned which spread to policy, practice and academic discourses. Analysis of the juvenile justice system and related institutions since their inception reveals the existence of a dual image of girls who were thought simultaneously to be more vulnerable than boys and to need a lot of care, while their delinquent behaviour was seen as 'worse' than that of boys. Female juveniles were generally considered to be breaking not only the law but also gender role expectations. The main aim of the missions and societies for delinquent girls in the nineteenth century was not to straight forwardly punishing them but to instill good virtues and raise consciousness in them. In the twentieth century while there was the revitalisation of detention centres for boys; one such centre for girls was closed. The conservative government suggested that the number of delinquent girls under the age of eighteen years was so small that their detention in young offender institutions may be abolished. The youth justice system responses to girls have been significantly influenced by broad socio-political and religious expectations of 'appropriate' female behaviour. Double standards have continually been applied with regard to girls' and boys' sexual behaviour, with girls being subject to scrutiny and social regulation in a way that boys have not been, girls have also sometimes been viewed as uncontrollable and worse than boys simply because of high expectations of their behaviour.



At the same time they have been considered more psychiatrically disturbed than boys which reflect the normal discourse in which women's behaviour was defined. (Muncie, 2006).

In India despite social awakening, the life of women did not improve in the second half of the 19<sup>th</sup> century. Extreme poverty and famine conditions often forced people to sell their daughters to make out a living. While the social reformers were championing the cause of female education, abolition of *sati*, and widow remarriage, publications like *Som Prakash* and *Amala Bandhob* went all out to expose the prevailing racketeering in women and young girls and drew the attention of the British Indian Government for their emancipation. Apart from female destitute, female juvenile offenders were very few in number. In the early years of the second half of the 19<sup>th</sup> century, the Inspector- General of prisons, North-Western Province, observed that *"(girls) rarely come before our courts as criminals, and their admission in the infancy of the scheme (reformatory system) would so materially increase our expenditure..."*(p.49). Therefore, juvenile female offenders were lodged together with the adult prisoners who were hardened criminals and prostitutes and this had a harmful influence on juveniles. Mary Carpenter (critique of the 19<sup>th</sup> century penal system adopted for juvenile delinquents) suggested to the British Indian government to establish separate reformatories for boys and young girls. But the plea had little effect on the colonial rulers. Their main excuse for not creating a separate juvenile reformatory for females was the small number of female juvenile offenders. In 1884, H.K. Beauchamp, a British non-official, while visiting Madras Prison drew the attention of the Inspector-General of prisons, A.G. Cardew, *"to the evil effects which must arise from female children being kept in the same yard as adult female convicts, who are often prostitutes or procurers"* (p.49). All these efforts motivated British officials to have second thoughts on the question of separate female reformatories and amendment of the Reformatory School Act of 1876. The Chief Secretary of the Madras Government agreed in principle to the idea of a female juvenile reformatory but ultimately concurred with the Inspector-General of Prisons' opinion that *"their numbers are hardly sufficient to warrant the maintenance of a separate reformatory."* Alternatively the Madras Government proposed to establish a *"depot"* at one of the central jails of the Presidency to lodge the juvenile female offenders. The concept of a *"depot"* is nothing but the negation of the very term *"reformatory"*. Thus, in the 19<sup>th</sup> and the early 20<sup>th</sup> century, female juvenile convicts were given no opportunity for reformation while the boys



were sent to reformatories. Even though there was an undercurrent of opinion in favour of forming separate female juvenile reformatories, it did not see the light of day. The main argument put forth by the British Indian Government against this proposal was that the number of female juvenile offenders was not enough to justify the creation of the separate reformatories. The only favourable factor was that in some jails female juvenile wards were opened for this purpose. (Chatterjee, 1995).

Available data show that delinquency has strong gender associations. International police data show that the delinquency rate of male juvenile offenders is more than double that of female juveniles. (Cox, 2011). In India, according to the National Crime Records Bureau (NCRB) a total of 43, 506 juveniles were apprehended during 2013 out of which 41, 639 were boys and 1,867 were girls. The percentage of girls to total juveniles was 4.3 percent. ([www.ncrb.nic.in](http://www.ncrb.nic.in)). Criminological theories about female pathways into crime have been abundant. The trajectory of theories relating to girls and young women has been unusually conservative compared with those relating to males reflecting cultural conceptions of psychological functioning and social-structural expectations of behaviour. Several studies of girls and young women in institutions in the 1960s and 1970s, for example pointing to high levels of emotional instability, poor self-image, and psychological disturbance in girls. Delinquency among girls has been attributed to a kind of psychological impact because of family dysfunction, obstacles in positive affective relationships and so on. It is also suggested that girls are induced to be more passive and domesticated than boys who are encouraged to be more ambitious, aggressive and extrovert. However, there is a common thread in such theories and it is in the direction of control theories that useful insights regarding males and females differential involvement in crime. Various restrictive and stimulative factors encourage women to conform to social norms that do not apply to men, one example being the fear of sexual assault. Girls are subject to stronger family control than are boys. Cultural concepts are such that society at large is less tolerant of deviant behaviour among females than among males. In addition, aggression and violence play an important role in the construction of masculinity and sexuality in patriarchal societies, the primary objective being to reinforce and maintain the status and authoritative position of men. (Cox, 2011).



Girls tend to be arrested for non-violent offences such as theft or running away from home. They are more likely than boys to be charged with and placed in detention for status offences. Status offences are acts that would not be considered criminal if one were an adult. However, because one is under the age of 18, these offences are handled by the juvenile justice system. Status offences include underage drinking, being incorrigible, truancy and running away from home. Further, eighty percent of female offenders, compared with 55 percent of males have criminal careers lasting less than a year. Girls also present a lower level of risk of re-offending and grow or mature out of crime rather sooner than their male counterparts. (Shoemaker, 2009).

**Childhood Abuse:** One of the most problematic aspects of the juvenile justice system is its failure to distinguish offenders from victims. Nowhere, is this more true than in the case of sexual abuse and sexual behaviour. According to the Office of Juvenile Justice and Delinquency Prevention (OJJDP), a high percentage of female delinquents, a reported 70 percent have history of sexual abuse, compared to a reported incidence rate of 30 percent for boys. Girls who are victims of abuse and trauma, running away from home may be less an act of rebellion and more an attempt at self preservation.

(<http://digitalcommons.wcl.american.edu/cgi/viewcontent.cgi?article=1391&context=hrbrief>). Research however, shows that the juvenile justice system continues to take a paradoxical stance towards girls expressing a desire to protect them from themselves and others while at the same time punishing them for behaviours deemed deviant or defiant, without making the connection between the behaviours and the underlying causes. In many underdeveloped countries, youth more often suffer from *double victimization*. Double victimization occurs when youth experience abuse and in reaction engage in delinquent behaviour that later result in labelling and punishment from the state for their delinquent and/or criminal activity. Juveniles who are victims of trafficking have been discovered in various countries to be delinquent. In many of these cases, these youth may be forced into child prostitution and though forced into such forms of victimization, may be inappropriately labelled delinquent by juvenile officers who consider such youth as vagrant and/or willing participants. This is particularly true for teenage girls in countries where the sex trade flourishes. Research shows that court involved girls and young women have disproportionately high rates of victimization,



particularly incest, rape and battering. Court involved girls also differ from court involved boys in that they tend to be more relationship-oriented and to internalize responses to trauma in the form of depression, self-mutilation and substance use. (Cox, 2011). Females are often identically handled for abuse and promiscuous behaviour or prostitution. In a study in Wisconsin, McIntosh and her colleagues reported that more than one-third of the adolescent females had been sexually abused. Eighty percent had been sexually assaulted and sixty-six percent reported attempting suicide. Most of the abused females did not seek assistance because of fear, embarrassment or belief that nothing would be done to help them. Although they had been processed by social workers, few reported discussing these problems. They reported that most programs were concerned with control or with effecting a change in the female's personality or attitudes. These abused females reported punitive handling by the courts and difficulties in school and at home. ([http://deepblue.lib.umich.edu/bitstream/handle/2027.42/67430/10.1177\\_001112878302900304.pdf;jsessionid=81CBE830E039AE5E156B9E517E8EF6C9?sequence=2](http://deepblue.lib.umich.edu/bitstream/handle/2027.42/67430/10.1177_001112878302900304.pdf;jsessionid=81CBE830E039AE5E156B9E517E8EF6C9?sequence=2)). A self report survey conducted by Budd et al. (2005) found that assaults committed by females are more likely to involve a victim they know well and more often the victim is male than female. Assault by a girl is more likely to be in anger or self-defence (Muncie, 2006).

According to India Legal Services, in India as in other countries of the world most juvenile crimes are committed by boys. Crimes committed by girls are less frequent and less serious than those by boys, but the rate of increase of female juvenile arrests has been greater than for boys. There is an increase in the female juvenile crime over the past few years that are under age of eighteen years for drug-abuse violation, liquor law violation, curfew, larceny, runaway, prostitution and for loitering. Girl's share of all juvenile arrests remained fairly steady over time ranging from about 15 percent to 29 percent. Official measures of juvenile crime underestimate their actual involvement and this is even more for females. Many suggest that girls are arrested disproportionately more than boys for such status offences as running away and curfew violations because of a tendency to sexualize their offences and to control their behaviour under the patriarchal authority of juvenile justice system. There is evidence that many young women run away to escape sexual victimization at home and once on streets they are vulnerable to further sexual victimization.



(<http://www.legalservicesindia.com/article/article/female-juvenile-law-and-society-1486-1.html>).

Following are some of the risk factors and obstacles commonly faced by girls in the juvenile justice system:

**Mental Health:** In reference to mental health disorders research suggests that girl juvenile offenders generally evidence higher rates of all mental health problems compared to boys, with the possible exception of substance use. In addition, both boys and girls in the juvenile justice system report significantly greater trauma exposure and Post-traumatic Stress Disorder (PTSD) symptoms compared to non-detained peers. Rates of PTSD among juvenile justice involved youth are generally higher among girls, with as many as one third of boys and half of girls in detention settings meeting criteria for PTSD. Taken together, research indicates that although both boys and girls in the juvenile justice system experience high rates of mental health problems, girls tend to be particularly disturbed. Further, Girls with PTSD were more likely to re-offend than were their peers. With the increasing number of females entering the juvenile justice system, it is imperative to understand what is fuelling this trend. Recent research has pointed to the prevailing link between experiencing a traumatic event and delinquent activity, which is reportedly much stronger in adolescent female offenders than in their male counterparts. Exposure to a traumatic event has been found to be two-to-three times higher among adolescent offenders than in the general population, with the majority of adolescent female offenders having been exposed to more than one type of trauma. Though, the connection between experiencing a traumatic event and delinquency among adolescent females has been established by studies, only few studies focus on trauma exposure and what mediates the impact of traumatic experiences on delinquent decision making among adolescent female offenders. Such an understanding is important because for females, physical or sexual abuse tends to start earlier and last longer than it does for males. As a result, adolescent females are more likely to have a higher prevalence of mental health or emotional disturbances, which may contribute to poor decision making and subsequent delinquency. (Becker et al. 2012).

**Physical Health:** Both girls and boys in the juvenile justice system report becoming involved in sexual behaviour at earlier ages, having higher incidences of sexually transmitted diseases, and engaging in riskier sexual behaviour than youth not involved in the system.





Researchers speculate that girls in the juvenile justice system experience higher rates of sexually transmitted diseases than boys in the system and girls in the community due to sexual abuse and involvement in prostitution and prostitution-related offences leading to sexual violence. Moreover, in jurisdictions where girls are arrested for prostitution-related offences such as running away, drugs, or public order offences at high rates, experts believe the arrest patterns conceal high rates of prostitution. Generally, research also indicates that the rate of risky sexual behaviour increases among girls in the juvenile justice system when girls experience substance abuse problems. In terms of pregnancy, studies indicate that girls in the juvenile justice system tend to reproduce early, and that approximately 10 percent of these girls experience a pregnancy while incarcerated, requiring prenatal care and related services.

**Family Relationships:** According to several studies, difficulties such as ineffective parenting, caregiver transitions, and recurrent conflict with parents increase the likelihood that girls may engage in delinquent behaviour. Research further indicates that when girls are violent, the violence is frequently directed at members of their families at a rate much higher than boys, as girls have a tendency to fight with members of their families three times more likely than boys, who frequently fight with peers or strangers because juvenile justice policies have relabelled girls' family conflicts as violent offences and police practices address such behaviour, girls involved in family conflicts continue to enter the juvenile justice system.

**Peer and Romantic Relationships:** Girls involved in the juvenile justice system are more apt to indicate that their closest peers are males, and more likely to engage in delinquent activities with those peers. In terms of romantic relationships, a stable romantic relationship appears to impact boys and girls differently. While such relationships are a positive for boys, and decrease participation in criminal activity, the reverse is true for girls. Researchers reason that the discrepancy involves choice, as girls with behavioural problems are more likely to be romantically involved with boys with similar problems, whereas the opposite appears to be true among delinquent boys. Further studies also indicate that when girls choose partners involved in delinquent behaviour, the result may be abusive relationships, which in turn lead to girls running away or committing nonviolent offences. Some research also reveals that delinquent girls involved with delinquent partners are more likely to bear children in adolescence.





<http://www.ncids.org/JuvenileDefender/Guides/RepresentingGirls.pdf>

In India, the National Crime Records Bureau, the nodal agency under the Ministry of Home Affairs, collects data on juveniles in conflict with the law. However, one serious gap is that it does not collect data on gender specific issues such as gender and type of juvenile crime or on the formation of gender specific delinquent trajectories.

Girls and boys come into contact with the juvenile court for similar reasons. Research shows that they both tend to share lower socioeconomic status, disrupted family backgrounds and difficulties in school. There are, however, key differences between girls and boys that have significant implications for how to effectively respond to girls who come into contact with the courts. Effectively responding to girls who engage in status offence behaviours must involve more than just taking elements of responses developed with boys in mind and changing a few things to make them suitable for girls. The juvenile justice system was originally designed to deal with the problems of boys and young men and, in doing so, neglected the gender-specific programming and treatment needs of girls and young women. Further, girls respond differently than boys to interventions and treatment and these differences require separate research and planning to meet the needs of girls enmeshed in a system designed to manage and serve predominantly male population. Availability of gender-specific interventions for girls lags well behind the availability of interventions originally designed with boys in mind. Although no evidence-based programs currently exist for gender responsive treatment of female delinquency, some suggestions are provided below for making the juvenile justice system more responsive to females.

Since delinquency behaviour is often determined by multiple factors, addressing just one factor such as youths to form healthy interpersonal relationships or parents' discipline skills is unlikely to have a substantial impact. In order for a comprehensive program to be effective it will need to address the risk and protective factors and assets common to girls in the justice system. In particular, it will be able to promote academic achievement and attachment to school, develop life skills, build positive inter-personal relationships including girls within the family and peer group and address mental and physical health concerns. Attending to girls' unique mental health and physical needs and providing services for pregnant, parenting and sexually active teens is necessary. Such girls also require gender specific medical care and counselling. There is need to hire and train staff who are



responsive to the interpersonal nature of girls' development and serve as believable role models. Mental health and juvenile justice professionals report that working with delinquent girls rather than boys is harder because these girls tend to have more difficulty forming trusting relationships with others and are more likely to be verbally abusive and relationally aggressive. Thus staffs' abilities to relate to girls are critical to program effectiveness. Male staff in particular may need additional training and assistance in boundary setting with female delinquents who may not have experienced a healthy relationship with an adult male. In order for positive changes to occur there is need to maintain an environment of physical, emotional and psychological safety. Research suggests that program participants need to feel safe in the program setting, feel open to learn from staff and other participants and feel comfortable taking risks with attempts to change their behaviours. Further, because girls are more likely than boys to be experiencing PTSD while detained, traditional base of maintaining order and the use of restraints in juvenile facilities may backfire with girls who can essentially be *revictimized* by such practices.

Strengths based models may be more effective than deficit based or punitive approaches. A core assumption of the strengths-based model is that individual are more likely to change when they are partners in identifying goals rather than simply weak passive recipients of change efforts initiated by others. Strengths-based programs that contain restorative justice component may be particularly effective with female delinquents. Restorative justice may help female delinquents develop positive identities and an awareness of their ability to alleviate the victims pain and restore wellbeing and promote a sense of community belonging rather than social isolation.

Although targeting the families is important for all juvenile offenders, the families of delinquent girls have a much greater likelihood of being severely dysfunctional and because abuse at home is more common, programs should be prepared to address it.

<https://wilenet.org/html/justice-programs/programs/juvenile-justice/library/what-works/what-works-practice-briefs-2008-01-girls-in-the-juvenile-justice-system.pdf>

In India, the child friendly measures in the juvenile justice legislation are indicative of the legislature's intention that the benefits of these provisions be available to all juveniles irrespective of the nature of offense committed by them. The issue of serious/violent juvenile crime is a complex one warranting a judicious approach to be adopted in order to



effectively address the competing interests of these juveniles, the victims (especially women and girls), and that of public safety. The gang rape of 16 December 2012 has triggered a nationwide debate on a number of issues, one of them being the quantum of punishment for juveniles involved in heinous crimes. The Juvenile Justice (Care and Protection of Children) Act, 2000 (JJ Act) prescribes a maximum period of three years detention in a Special Home which many believe has been disproportionate to the impact of such a crime on the victim and society. There are two distinct positions that have emerged. Firstly, that all juveniles in the age group of 16-18 years be dealt with by the adult criminal justice system and secondly, that only those juveniles who have allegedly committed heinous crimes be dealt with in this manner. The incident has placed issues that require a deeper examination of the principles and values of the juvenile justice system and an evaluation of the adequacy of responses to juveniles who commit serious/violent crime in India. The most glaring deficiency of the Juvenile Justice Act (JJ Act) is that it is gender blind. The child rights activists who are resisting any change in this law are ignoring this defect. India's gender asymmetry is no secret yet the JJ Act assumes that violent criminality is equal among the genders and so is its impact. How can that be? Consider all the recent cases that have forced the government to consider a review of the JJ Act. Is there a single case in which female juvenile has inflicted barbaric suffering on a man? As for suffering, the trauma for a girl victimized by a juvenile male is far worse and much more-long lasting than the opposite situation. Rape, for example, leaves a girl with a social stigma even if her physical injury is treatable. The stigma lasts forever as Indian society applies contrasting standards for male and female victims of crime. Even if a male has committed the most horrible act recorded in the recent history of sexual crimes, he must be treated as a juvenile, insist the JJ Act and its activist supporters. Such insistence leaves the judiciary helpless and understandably irritated with the constraints placed on its legitimate functioning by a socially-culturally illiterate law. The Ministry of Women and Child Development wants to lower the age of its application to 16. This change might resolve a few cases but the problem presented by the current law will persist. The present JJ Act is flat, rigid and indifferent to social reality. Its mild provisions make a pretence to being progressive. By ignoring the reality of gender asymmetry the JJ Act condones and encourages criminality. (Kumar, 2014). Lowering the age of juvenile will not help in better protection of girls from juvenile crimes or in reform of



serious juvenile offenders. Though only 4 percent of all juveniles apprehended in the year 2013 were girls, they face much graver battles in their journey towards rehabilitation and reintegration into the community. The law is largely silent on girl juveniles, though there are rules providing for segregation based on sex in the Observation Homes/ Special Homes and for reintegration into society through customized after-care programmes. There are no legal standards however, for specific kinds of services that are to be provided to girls in Special Homes resulting in statutory functionaries and civil society actors finding it extremely challenging to deal with this special group of children.

<https://www.nls.ac.in/ccl/justicetochildren/intl.pdf>

Sexual Offences against children in India have reached an epidemic proportion and the Protection of Children from Sexual Offences Act (POCSO), 2012 is unlikely to be able to address the problem. A total of 48, 338 child rape cases was recorded from 2001-2011. The registration of such cases have been consistently increasing and India saw an increase of 336 percent of child rape cases from 2001 (2113 cases) to 2011 (7112 cases). These are only tip of the iceberg as the large majority of the cases of child rape are not reported to the police while children regularly become victims of other forms of sexual assault too. Many of the child rape cases take place in Juvenile Homes i.e., Observation Homes, Special Homes or Shelter Home. Juvenile Justice Homes established to provide Care and Protection as well as reintegration, rehabilitation and restoration of the juveniles in conflict with law and in need of care and protection have become India's hell holes where inmates are subject to sexual assault and exploitation, torture and ill treatment apart from being forced to live in inhuman conditions. Unfortunately the girls remain the most vulnerable. In most cases sexual assault in the juvenile justice homes continues for a long period as the victims are not able to protest and suffer silently in the absence of any inspection by the authorities under the JJ (C&PC) Act. While authorities are main predators the absence of separate facilities, in many cases for boys and girls and in most cases as per age facilitates sexual assault on the minor inmates by the senior inmates. The sexual assault of children in the Juvenile justice Homes continues unabated as the government of India i.e., the Ministry of Women and Child Development as the State Governments have failed to implement the Act in letter and spirit. It failed to address four critical areas indispensable for addressing child sexual abuse in juvenile justice institutions i.e., functional Inspection Committees, Registration of all juvenile



homes, effective and functional Child Welfare Committees and Separation of inmates on the basis of the nature of the offences, sex and age. Under such circumstance the implementation of the JJA in actual later and spirit is the need of the hour.

There is a steady increase in the number of girls entering the juvenile justice system ill equipped to address their needs. Law makers should create greater incentives and provide stricter guidelines encouraging facilities to implement gender specific programming. Considering the overwhelming number of traumatized and sexually abused girls who enter the juvenile justice system state legislatures must evaluate the effectiveness of the services provided to girls in state detention facilities and allocate funding for the development of appropriate programmes and the hiring and training of staff. In addition states should move toward exercising the *least restrictive alternative* by exploring community-based alternatives.

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