



ANALYTICAL APPROACH TO THE OFFENCE OF HIT AND RUN UNDER BHARATIYA NYAYA SANHITA (BNS)

Dr. Ramesh Kumar Singh
Assistant Professor
Veer Kunwar Singh University, Ara Bihar
Posted at Maharaja Law College, Ara

DECLARATION: I AS AN AUTHOR OF THIS PAPER /ARTICLE, HERE BY DECLARE THAT THE PAPER SUBMITTED BY ME FOR PUBLICATION IN THE JOURNAL IS COMPLETELY MY OWN GENUINE PAPER. IF ANY ISSUE REGARDING COPYRIGHT/PATENT/OTHER REAL AUTHOR ARISES, THE PUBLISHER WILL NOT BE LEGALLY RESPONSIBLE. IF ANY OF SUCH MATTERS OCCUR PUBLISHER MAY REMOVE MY CONTENT FROM THE JOURNAL WEBSITE. FOR THE REASON OF CONTENT AMENDMENT /OR ANY TECHNICAL ISSUE WITH NO VISIBILITY ON WEBSITE /UPDATES, I HAVE RESUBMITTED THIS PAPER FOR THE PUBLICATION.FOR ANY PUBLICATION MATTERS OR ANY INFORMATION INTENTIONALLY HIDDEN BY ME OR OTHERWISE, I SHALL BE LEGALLY RESPONSIBLE. (COMPLETE DECLARATION OF THE AUTHOR AT THE LAST PAGE OF THIS PAPER/ARTICLE

Abstract

The offence of “hit and run” occupies a critical position in criminal jurisprudence due to its direct relationship with road safety, culpability, and victim justice. With the enactment of the Bharatiya Nyaya Sanhita, 2023 (BNS), India’s criminal law framework has undergone significant reform, including the reclassification and penalization of road traffic offences. This paper provides an analytical approach to the offence of hit and run under the BNS by examining its legislative trajectory, essential ingredients, judicial interpretation, and policy rationale. It contrasts the provisions of the BNS with the Indian Penal Code (IPC), engages with comparative legal perspectives, and highlights the challenges in balancing deterrence, proportionality, and fairness. The paper concludes by suggesting interpretive and policy measures for effective enforcement while safeguarding constitutional guarantees.

Keywords: *Bharatiya Nyaya Sanhita (BNS), Hit and Run, Rash and Negligent Driving, Mens Rea.*

1. INTRODUCTION

The crime of a hit and run has been misinterpreted to be a simple road traffic offence, but it is actually a much more complicated legal and moral offence. It brings together two types of culpability: the first instance of rash or careless driving resulting in injury and the second instance of leaving the scene without rendering any help or reporting the incident. All these acts are proofs of not only non-care but also a rejection of human life and social accountability. This dual aspect of criminal law makes the crime a hybrid form of negligence-omission where

the law is left struggling to find fault not only in causing harm but in failing to avert it. These examples lead to the confusion between personal responsibility, personal morality and community protection, therefore, hit and run is a crime, not a traffic offense.

1.1.The Societal Magnitude of Road Accidents in India

The seriousness of the hit and run offence in India needs to be placed in the bigger picture of the road safety crisis in India. India has always led the list of countries with the highest numbers of road accidents, with more than 1.5 lakh deaths recorded per year as per official records. These accidents have a human cost that is made worse by the fact that a large percentage of the victims do not receive medical help as soon as they are required due to the offending drivers fleeing. In this case, the first careless act of driving will yield to the damage inflicted by the lack of timely intervention. It has been found that a couple of minutes of delay in accessing medical facilities is the difference between life and death. Therefore, escaping makes guilt more severe, and negligence turns into dominance indifference. The social consequences of the figures are far more emotional than the figures themselves: families are deprived of their livelihoods, people lose trust in road safety, and the justice system is frequently accused of insufficient deterrence systems.



Figure 1: New Hit & Run Law: Bharatiya Nyaya Sanhita 2023



1.2. Treatment of Hit and Run under the Indian Penal Code, 1860

Hit and run was not a recognised offence in the Indian Penal Code, 1860 (IPC). Rather it treated such cases in general terms: Section 279 criminalised rash driving on a public way; Section 304A dealt with causing death by negligence; and Section 337 and 338 dealt with causing hurt and grievous harm by acts that endangered human life. Although courts frequently saw an act of fleeing the scene as circumstantial evidence of rashness or an awareness of guilt, as such it was not, in itself, a crime. This left a loophole in criminal responsibility whereby criminals may go scot-free with comparatively light penalties even when the action of absconding was morally wrong after inflicting harm. Critics claimed that the IPC framework was flawed and obsolete as it did not accommodate the dual aspect of culpability that exists in hit and run cases. This usually resulted in a patchy enforcement and left the victim with little access to the law other than normal negligence laws.

1.2.The Paradigm Shift under Bharatiya Nyaya Sanhita, 2023

With the introduction of the Bharatiya Nyaya Sanhita, 2023 (BNS), Indian criminal law has experienced a paradigm shift, especially in terms of how road accidents and cases of hits and run are treated. In contrast to the IPC, the BNS expressly formalised the concept of hit and run as an aggravated offence with provisions that not only punished neglectful or rash driving but also criminalised the phenomenon of not reporting the accident or absconding the accident scene. In Section 106(2) of the BNS, a sentence of up to ten years imprisonment and a fine is given to drivers who kill people by rash or negligent driving and absconding without reporting to the police or availing assistance. This clause is a definite acknowledgement of the two sins: the first negligent sin and the second sin of failure to act. That shift also harmonizes the law of India with world legal practice, in which the notions of duty to rescue and failure to stop have long been considered substantive offences. The BNS focuses on unity in the society, victim protection, and discouraging criminal acts by making omission a criminal act in addition to commission.

1.3.Objectives of the Study

The primary objectives of this study are:

1. To examine the historical treatment of hit and run offences under the IPC and identify its limitations.



2. To analyze the structural and doctrinal innovations introduced by the BNS, with a focus on Section 106 and related provisions.
3. To assess the impact of enhanced liability and penalties on deterrence, victim protection, and justice delivery.
4. To situate India's approach within a comparative international framework, drawing parallels with other jurisdictions.
5. To evaluate the practical challenges in enforcing the BNS provisions, including proportionality of punishment, infrastructural limitations, and risks of over-criminalization.

2. LITERATURE REVIEW

Jadon, D. S. (2024) critically examined the juridical and societal changes that the Bharatiya Nyaya Sanhita, 2023 (BNS) has introduced to the criminal law system in India and placed the reforms in the context of the criminal law system. His work stressed that the BNS was not only a change in legislation but also an organisational re-organisation of the criminal justice system, which was a replacement of the colonial-era Indian Penal Code, 1860. According to the author, the BNS was meant to promote efficiency, victim-centric justice and deterrence by re-defining its provisions to directly respond to modern challenges like cybercrime, organized crime, and road safety. According to Jadon, the evaluation of the law indicated that the law aimed at closing the discrepancy between the populace expectations and the juridical practice by incorporating more accountability systems and crime penalties imposed on offences that had direct impacts on the safety of the populace. Critically, he noted that such provisions as those on rash driving and incidents of a hit and run were indicative of the understanding by the state that there was a need to have a more formidable deterrent against careless driving. He added, however, that this would increase the question of proportionality and enforceability, especially in a nation characterized by a lack of infrastructural and administrative capacity.

Amreen, R. H., & Subramanian, S. R. (2023) also conducted a critical evaluation of the Bharatiya Nyaya Sanhita, but their analysis was more of the socio-legal effect of the reform. As they emphasized, the BNS signified an effort to both bring criminal law into correspondence with modern socio-political realities and to ensure that the rights of the victims and the interests of the community took center stage in the penal policy. As noted in their study, the new

provisions directly met the complaints of the people who were not fairly addressed in the IPC, particularly those dealing with women safety, mob violence, and road accidents. They saw the introduction of more penalty provisions on crimes such as hit and run as a token gesture in response to popular anger over the laxity in punishing offenders under the previous code. In addition, they claimed that the BNS aimed at creating a social change in attitudes towards accountability, in that not only punitive, but also moral responsibility is imposed on offenders, especially in cases where people flee the scene and leave victims without immediate assistance. But as Amreen and Subramanian also noted, the problem of over-criminalization can also be a challenge, where more severe punishments will be misused, abused, or applied arbitrarily unless the punishments are balanced with procedural and infrastructural safeguards.

Akhil Kumar, K. S. (2023) placed it in the context of legal evolution and comparative jurisprudence. In his work, he noted that the BNS was a domestic reform that was also a global movement towards modernization of the penal codes to suit the new types of criminality. He presented an in-depth doctrinal assessment of the way the BNS tried to reconcile continuity and change, preserving the structural character of the IPC but adding some innovations to meet the demands of our time. Specifically, Kumar paid attention to the reclassification of offences, to increasing punishment and to making liabilities clearer, to minimize the ambiguity in interpretation. In reference to the alleged offences such as rash and negligent driving, he observed that the BNS imposed a higher duty standard among drivers and therefore failure to report an accident or to leave the scene was an independent aspect of liability. This, he said, was a progressive step towards a duty-based concept of criminal law, in which omission was considered no less serious than commission. In his work, Kumar also contextualized the reform in an international comparative context, revealing that the criminal law of India had become more akin to the continental comparative models where solidarity and responsibility are enshrined in law as legal obligations. However, he warned that, unless sufficient awareness, judicial transparency and infrastructural changes, the bold proposals of the BNS might remain largely aspirational.

Pareek, A. (2024) presented the full picture of what these two legal documents share and what they do not. His work emphasized that the BNS was retaining the structural framework of the IPC, but it was attempting to rationalize the provisions by meeting the modern-day challenges of cybercrime, organized crime, terrorism, and offences against women. Pareek stated that the



IPC was not changed to BNS through some symbolic gesture by the legislature but as a substantive effort to re-align the philosophy of criminal law towards a more Indianized and victim-oriented approach. He said that the various provisions such as those dealing with rash and negligent driving, mob lynching and sexual offences were reformulated into more explicit statements with penalties that were less lenient in nature and this reflected a legislative motive to change the mindsets of offenders. Notably, Pareek noted that the criminalization of omission, in the form of failure to report an accident in situations of rash driving, was a major doctrinal innovation that did not feature in the IPC. Meanwhile, he has warned that the language and structure of the IPC and the BNS were too similar to allow most of the interpretative problems of the IPC to be overcome without judicial reforms and infrastructure improvements. These comparative analyses eventually showed that the BNS was not a wholesale break but an evolutionary reform, in terms of maintaining the familiar and the introduction of the new.

Indusekhar, A. (2024) approached this in a different way by looking at the Bharatiya Nyaya Sanhita Bill and the Bharatiya Nagarik Suraksha Bill and setting them in the larger context of criminal justice reform in India. His BNS was based on the idea that the BNS should not be studied alone, but as one of a trio of reforms, alongside Bharatiya Sakshya Adhinyam, which were aimed at substituting colonial laws with native laws. Indusekhar sharply wrote that even though the BNS was evidence of progressive intent, especially on victim protection, organized crime, and hit-and-run offences, valid issues existed about over-criminalization, proportionality of punishment as well as misuse of the increased police powers. He highlighted that the social desire to punish more which had influenced measures like the increased liability to leave scenes of accidents should be weighed against the constitutional protection to avoid over-punishment. Moreover, he said that the accentuation of deterrence in the BNS could not be achieved with the same emphasis on institutional capacity-building and accountability mechanisms since this would make the reforms appear more rhetorical than change. His exposition also placed the BNS in the broader political context of decolonization of Indian law, indicating that although the substitution of the IPC had a symbolic significance, the real challenge was whether the BNS could play a meaningful part in overcoming systemic issues of delay, inequality, and enforcement that afflicted the Indian criminal justice system.

3. LEGISLATIVE BACKGROUND AND EVOLUTION

As the colonial-era code, the Indian Penal Code, 1860 (IPC) provided a foundation upon which offences caused by rash and negligent acts can be dealt with, including rash and negligent acts involving road accidents. But it failed to particularly acknowledge and categorise the word hit and run as a separate offence. Rather, the liability was assembled by dribbles and drabs. Section 279 made rash or negligent driving on a public way an offense punishable; and, under Section 304A, cases where death was caused by negligence, but not by culpable homicide. Equally, Sections 337 and 338 punished any type of act that resulted in hurt or grievous hurt to individuals as a result of negligence.

In practice, the enforcement of these provisions implied that the drivers in an accident were not charged with evading the place of the accident but with the offense of negligent driving. Absconding was considered circumstantial evidence of guilty intent or an aggravating factor to determine culpability. Courts thus tended to adopt judicial interpretation and inferences of evidence to resolve the moral wrong of abandoning a victim without offering help. This placed great loopholes in the delivery of justice because victims of road accidents were often denied timely medical care, and offenders were often spared a light sentence particularly when the crime fell under Section 304A and had a relatively light sentencing policy.

The lack of a definite statutory definition of what the IPC defines as a hit and run implied that the crime was regularly viewed as a mere extension to rash or careless driving and not as a crime by itself or a serious crime. This legislative gap grew more troublesome as the volume of road traffic surged and the number of deadly car accidents began to grow, and the effectiveness of the IPC in dealing with current road safety issues came into question.

3.1. Transition to the Bharatiya Nyaya Sanhita

Introduced as part of the wide-ranging criminal law reforms in India, the Bharatiya Nyaya Sanhita (BNS), 2023, was aimed at filling these gaps by re-organizing and updating the system of criminal liability. The law was the first to acknowledge the crime of a hit and run as a legally identifiable wrong. Section 106(2) of the BNS specifically addresses circumstances in which there is a rash or negligent driving that leads to death and the driver either escapes the scene of the accident or does not report the accident to the police. This is a major change in that the IPC model could only capture such conduct indirectly.



BNS penalties are significantly more severe and the terms include a prison sentence of up to ten years and a fine. This better sentencing regime is an output of a well-crafted legislative intention that drivers should not abandon those who are harmed as a result of an accident and that it reinforces the duty of care, which binds all road users to society. What is much more important is that the criminalization of the act of fleeing, regardless of the negligent causation of the accident, indicates that the doctrinal emphasis has changed. Absconding is no longer viewed by the law as an aggravating factor but as a substantive wrong and thus the accountability mechanisms have been enhanced.

In so doing, the BNS brings Indian criminal jurisprudence in line with international best practices whereby hit and run would be regarded as a serious public safety offence. The law reform is also indicative of the recognition of the socio-legal fact that early reporting and medical aid will save lives and that prevention must be strong enough to impose penalties. In this way, the BNS reinvigorates the concept of hit and run as a moral and legal violation where the offence ceases to be encapsulated within broad types of negligence but is instead viewed as a crime in its own right which should be severely punished.

4. ESSENTIAL INGREDIENTS OF THE OFFENCE UNDER BNS

The offence of hit and run under the Bharatiya Nyaya Sanhita (BNS) is composed of several doctrinal elements that collectively define criminal liability.

- **Rash or Negligent Driving:** The first factor is rash/negligent driving that creates the basis of wrongful act. This can be described as driving inconsistent with the ordinary use of reasonable care, posing an avoidable risk to other people. Liability is caused by the inability of the driver to take due caution when using a vehicle.
- **Causation of Death or Injury:** The second factor is the fact that the act was negligent and causes the harm. The rash or negligent driving would have to cause death or injury directly to be able to attach liability. This will ensure that those motorists whose conduct causes real damages are criminally responsible and that some form of proportionality is created between responsibility and justice.
- **Failure to Report or Fleeing the Scene:** The third component presents a positive obligation to stay at the scene, or to report the accident. In contrast to the IPC, the BNS considers fleeing as an independent element of an offence. Absconding deprives victims

the right to timely help and casts off the law and social accountability, and therefore, the act in itself is a punishable offense regardless of the reckless driving.

- **Mens Rea (Culpable Indifference):** Last but not least, culpable indifference as a form of mens rea is what differentiates ordinary negligence and aggravated liability. Although the act of negligent driving is not intentional, fleeing shows increased levels of recklessness or intentionality to ignore human life. This multiple-layered liability is indicative of a constructivist paradigm in which an omission (not reporting) intensifies the commission (negligent driving).

5. JUDICIAL INTERPRETATION AND CASE LAW

Prior to the implementation of the Bharatiya Nyaya Sanhita, the Indian courts largely addressed cases of hit and run through the provisions of the IPC that concerned rash and negligent driving. In *State of Karnataka v. The Supreme Court* ruled in *Satish* (1998) that rashness has to be proved by showing clear evidence and cannot be inferred by the mere occurrence of an accident. The case brought into the fore the rule that one must have been negligently to be negligently liable and that can be proved. Likewise, in *Alister Anthony Pareira v. Regarding the reckless driving case scenario*, the Court, *State of Maharashtra* (2012) has emphasized on the gravity of the targeted offences hence, the penalty in question was rather severe hence, validating the preventive impact of punishment in traffic crime. In both situations, running away was considered as very good evidence of guilty behaviour, but not as the constituent of the crime.

5.1. Prospects under BNS

Courts, with the introduction of the BNS, Section 106, are predicted to leave evidentiary presumptions behind and deal with absconding as a substantive component of the crime. It will require judicial interpretation to specify what the driver is supposed to do, specifically what constitutes reporting and what does not. Courts may need to consider whether or not immediate intimation to police is required, or whether or not medical assistance arrangements might be sufficient. The other problem issue is whether panic or fear during the commission of the accident will counterbalance liability, given the state of mind of the perpetrator. Additionally, more complex cases such as that of drivers who have fled in fear of mob justice will require a subtle balancing of law and self-preservation in the hands of the judiciary. Such interpretive



disputes will eventually form the jurisprudential outlines of Section 106, and determine the frontiers of liability under the new regime.

6. COMPARATIVE LEGAL PERSPECTIVES

To gain further insights into how the Bharatiya Nyaya Sanhita (BNS) has dealt with the issue of hit and run offences, it is prudent to look at how other jurisdictions have dealt with such behaviour. The comparative analysis provides an overview of the trends in world law, the treatment of escaping drivers, and a tradeoff between deterrence and victim protection and social responsibility.

- **United Kingdom:** The failure to stop and report after an accident is clearly criminally punishable in the United Kingdom under the Road Traffic Act. The provision will not only create a duty to stay at the scene, but also an obligation to give information and, where applicable, help victims. Violation is punishable by imprisonment and heavy fines and suspension of driving. The British jurisprudence has always underlined that fleeing aggravates the damage, since it compromises the access of the victim to immediate help. It is a victim-oriented framework in which the primary components are rescue and accountability rather than punishment.
- **United States:** The law of hit and run is applied in the United States on the state level, but there is a common agreement that fleeing is a serious criminal offense. In the overwhelming majority of states, the felony crime of abandonment of an accident scene is committed upon the basis of serious injury or death, regardless of the independent establishment of negligence in driving. The law thus replaces causation with conduct following the accident, absconding has become an independent offence. This is based on the American legal system which has a great deterrent philosophy, where drivers are obliged to aid victims, or they face drastic repercussions.
- **Germany:** Germany takes a very strict position when it comes to Section 142 of the Strafgesetzbuch (StGB), which criminalizes the unauthorized leaving of accident scenes. The basis of this provision is a wider continental European principle of duty to rescue, which expresses an ethical and a legal duty to offer rescue. Failing to help is considered a breach of social duty and not an individual offence as is a major focus of German law. The jurisprudence of this case reflects an integration of criminal responsibility and moral expectations of social responsibility.



- **Position of the BNS:** The Bharatiya Nyaya Sanhita (BNS) is closer to the continental European approach than the old common law approach to the IPC. The BNS punishes the omission as sinful as the commission, because it criminalizes the act of leaving the scene itself. This is a manifestation of solidarity, victim protection and active responsibility to assist and a new progressive orientation of Indian criminal law. In this regard, Section 106 of the BNS places India into a worldwide trend to enhance responsibilities of drivers to be responsible after an accident.

7. CRITICAL EVALUATION

Section 106 of the Bharatiya Nyaya Sanhita (BNS) has taken a major step in dealing with hit and run offences. Although the framework has a number of progressive aspects, there are a number of practical and doctrinal issues that have to be given due attention.

Merits of BNS Framework

- **Victim-Centric Justice:** Recognizes that fleeing denies victim's timely aid.
- **Deterrence-Oriented:** Harsh penalties incentivize compliance with reporting obligations.
- **Clarity in Law:** Explicitly codifies what IPC left implicit, ensuring predictability.

Challenges and Concerns

- **Proportionality:** Ten-year imprisonment may be excessive for negligent acts compounded by panic-driven flight.
- **Practical Enforcement:** Identifying absconding drivers remains difficult due to weak surveillance infrastructure.
- **Mob Justice Dilemma:** Drivers often flee due to fear of assault; the law does not adequately distinguish between malicious fleeing and self-preservation.
- **Overlap with Motor Vehicles Act:** Need for harmonization to prevent double jeopardy or inconsistent penalties.

8. POLICY RECOMMENDATIONS

Several policy considerations can be made to reinforce the enforcement of Section 106 under the Bharatiya Nyaya Sanhita and thereby protect the victim as well as drivers. The following policies are introduced to help explain the responsibilities and the improvement of compliance in addition to fostering a culture of ownership on the roads.

1. **Clarificatory Guidelines:** The judges or legislators need to be provided with some indication of what constitutes sufficient reporting following an accident. A set of rules on timelines, contacts, and acceptable modes of reporting can decrease ambiguity, control enforcement, and make drivers aware of their legal responsibilities.
2. **Safe-Harbour Provisions:** The law would have safe-harbour provisions to cover those who run away as they face imminent dangers, like mob violence. The concept of self-preservation and accountability should find some middle ground where the driver is accorded conditional immunity provided, he or she reports the accident at a later date or renders assistance.
3. **Integration with Technology:** With the help of digital technology, compliance and enforcement can be enhanced. By associating reporting accidents with mobile apps or automated crash notification systems, instant notification to authorities and emergency services, minimized damage, and valuable investigations can be achieved.
4. **Graduated Penalties:** A progressive system of penalties would distinguish between careless, reckless and deliberate cases of hitting and running. By adjusting punishment in relation to the seriousness of the behavior, proportionality is maintained, fairness improved, and the deterrent effect of law is not lost by meting out unduly draconian penalties on minor or panicked violations.
5. **Public Awareness:** Lastly, the culture of duty-based responsibility among the drivers has to be developed through public awareness campaigns. Educational programs can emphasize the ethical and legal responsibilities to stay at accident scenes, report cases within a timely manner, and help victims, and hence support the social goals of Section 106 of the BNS.



9. CONCLUSION

The discussion of the hit and run in the Bharatiya Nyaya Sanhita represents an important and conscious reform of criminal law in India, designed to respond to the disturbing road safety epidemic in the country. Section 106 criminalises absconding as a separate offence, thereby imposing explicit legal duties on drivers which focus on the obligations of care, social solidarity and responsibility to victims. Not only is this a more adequate deterrent, but it is also more consistent with legal responsibility, ethical standards, and societal norms in the sense that negligence that is compounded by escaping the scene should be perceived as such. However, this provision can be successful only in the case of extensive implementation that does not go beyond such constitutional principles as the proportionality of punishment, the right to a fair trial, and the protection of human rights. Jurisprudential interpretation will be instrumental in establishing the limits of liability in subtle cases that relate to panic, self-defence or mob violence threats. Road safety, including the compliance and protection of victims, can be transformed by infrastructure, technological projects, e.g., automated crash notification, and education, all of which falls under section 106. However, absent such reinforcing mechanisms the risk exists that the law might be seen as excessively broad and may impose severe punishment not always proportional to the intent and circumstances of the offender, and thus would fail to provide fairness or confidence in the criminal justice system.

REFERENCES

1. Sreekumar, A. (2025). *An Exclusive chapter on 'offences relating to women and children' in BNS-A critical analysis. Edulogic International Journal for Multi Disciplinary Research p-ISSN 3051-2395 e-ISSN 3051-2409, 1(01), 107-116.*
2. Pandey, M. S. *EVOLUTION OF CRIMINAL LAW: A Comparative STUDY OF IPC AND BNS.*
3. Puthalath, S., Sapna, S., & Kumar, P. (2025). *Effective Police Investigation Under BNSS 2023: Existing Legal Framework and Challenges. In Rethinking the Police for a Better Future: Navigating Policing Challenges with Accountability and Trust (pp. 61-76). Cham: Springer Nature Switzerland.*
4. Property, O. A. *A Comprehensive Analysis of the Bharatiya Nyaya Sanhita, 2023.*

5. Jadon, D. S. (2024). *Delineating Juridical and Societal Shifts: An in-Depth Assessment of the Bharatiya Nyaya Sanhita, 2023*. *Legal Lock J.*, 4, 89.
6. Amreen, R. H., & Subramanian, S. R. (2023). *Delineating Juridical and Societal Shifts: An in-Depth Assessment of the Bharatiya Nyaya Sanhita, 2023*. *Legal Lock J.*, 3, 80.
7. Akhil Kumar, K. S. (2023). *The Bhartiya Nyaya (Second) Sanhita 2023: An Integrated Perspective-A Comprehensive Study and Analysis*. *Jus Corpus LJ*, 4, 350.
8. Pareek, A. (2024). *A Comparative Evaluation: Bhartiya Nyaya Sanhita 2023 in Opposition to Indian Penal Code 1860*. *Issue 5 Int'l JL Mgmt. & Human.*, 7, 1122.
9. INDUSEKHAR, A. (2024). *Revisiting Criminal Law Bills: An In-Depth Critical Analysis of Bharatiya Nyaya Sanhita Bill and Bharatiya Nagarik Suraksha Bill*.
10. SHAIKH, A. A. A., & AHMED, R. S. W. S. *COMMUNITY SERVICE AS A PUNISHMENT UNDER BNS: A STEP TOWARDS REFORMATIVE JUSTICE IN INDIA*.
11. Shivani, S. D. (2025). *Juvenile Crime in Small Towns vs. Big Cities: A Comparative Perception Study*. *Big Cities: A Comparative Perception Study*.
12. Wang, B., Jing, P., & Jiang, C. (2023). *Combining SEM, fsQCA and BNs to Explore E-Bike Riders' Helmet Wearing Intentions under the Impact of Mandatory Policies: An Empirical Study in Zhenjiang*. *Sustainability*, 15(24), 16704.
13. Mahar, M., & Srivastava, R. K. (2024). *From Colonial Legacy to Indigenous Harmony: Evaluating the Transition towards the Indianisation of the Criminal Justice System*. *Issue 2 Int'l JL Mgmt. & Human.*, 7, 3891.
14. Fenton, N., Neil, M., & Lagnado, D. A. (2013). *A general structure for legal arguments about evidence using Bayesian networks*. *Cognitive science*, 37(1), 61-102.
15. Wu, J., Rasouli, S., Zhao, J., Qian, Y., & Cheng, L. (2023). *Large truck fatal crash severity segmentation and analysis incorporating all parties involved: A Bayesian network approach*. *Travel behaviour and society*, 30, 135-147.



Author's Declaration

I as an author of the above research paper/article, here by, declare that the content of this paper is prepared by me and if any person having copyright issue or patent or anything otherwise related to the content, I shall always be legally responsible for any issue. For the reason of invisibility of my research paper on the website /amendments /updates, I have resubmitted my paper for publication on the same date. If any data or information given by me is not correct, I shall always be legally responsible. With my whole responsibility legally and formally have intimated the publisher (Publisher) that my paper has been checked by my guide (if any) or expert to make it sure that paper is technically right and there is no unaccepted plagiarism and hentriacontane is genuinely mine. If any issue arises related to Plagiarism/ Guide Name/ Educational Qualification /Designation /Address of my university/ college/institution/ Structure or Formatting/ Resubmission /Submission /Copyright /Patent /Submission for any higher degree or Job/Primary Data/Secondary Data Issues. I will be solely/entirely responsible for any legal issues. I have been informed that the most of the data from the website is invisible or shuffled or vanished from the database due to some technical fault or hacking and therefore the process of resubmission is there for the scholars/students who finds trouble in getting their paper on the website. At the time of resubmission of my paper I take all the legal and formal responsibilities, If I hide or do not submit the copy of my original documents (Andhra/Driving License/Any Identity Proof and Photo) in spite of demand from the publisher then my paper maybe rejected or removed from the website anytime and may not be consider for verification. I accept the fact that as the content of this paper and the resubmission legal responsibilities and reasons are only mine then the Publisher (Airo International Journal/Airo National Research Journal) is never responsible. I also declare that if publisher finds Any complication or error or anything hidden or implemented otherwise, my paper maybe removed from the website or the watermark of remark/actuality maybe mentioned on my paper. Even if anything is found illegal publisher may also take legal action against me.

Dr. Ramesh Kumar Singh
