
11. Legal Implications of Juvenile Rash Driving and Its Contribution to Accidental Deaths in India

Dr. Sachin Joshi

Asst. Prof., Dept. of Law,
M.L. Dahanukar College of Commerce and Economics.

Abstract:

The issue of juvenile rash driving and its contribution to accidental deaths has become a significant concern in India, resulting in severe consequences for individuals and society. This critical analysis examines the current legal framework, focusing on key provisions within the Indian Penal Code (IPC), the Motor Vehicles Act (MVA), and the Juvenile Justice (Care and Protection of Children) Act (JJ Act). The aim is to assess the effectiveness of existing laws and identify areas that require reform. The study also includes a comparative analysis of how India, the United States, and the United Kingdom address this issue, highlighting both shared challenges and country-specific factors. Additionally, landmark judicial rulings in India are reviewed, emphasizing the role of the judiciary in shaping the legal treatment of juvenile offenders. The research methodology incorporates a thorough review of existing literature, an analysis of legal statutes, and a comparison of international best practices. Key recommendations for reform include enhancing law enforcement, adopting more deterrent sentencing measures, improving data collection systems, and placing a stronger focus on rehabilitation and restorative justice for juvenile offenders.

Keywords:

Juvenile rash driving, Accidental deaths, Legal framework, Juvenile justice, Road safety.

11.1 Introduction:

safety concerns, presenting significant challenges for both the judicial system and law enforcement. Recent data from the National Crime Records Bureau (NCRB) shows a troubling 37% increase in accidents caused by underage drivers between 2017 and 2021, underscoring the urgent need for a critical examination of the legal and regulatory framework governing this issue. The Motor Vehicles Act, 1988 prohibits individuals under the age of eighteen from obtaining a driver's license, but enforcement remains a challenge as minors often find ways to access vehicles. Compounding the issue is the complexity introduced by the Juvenile Justice (Care and Protection of Children) Act, 2015, which focuses on rehabilitation rather than punishment for juvenile offenders. While this approach aims to reintegrate youth into society, its effectiveness in curbing reckless driving has been questioned. The study highlights the potential role of restorative justice as an alternative to punitive measures, considering the developmental and psychological factors influencing juvenile behavior. Research has shown that the adolescent brain's susceptibility to impulsive decision-making contributes to risky driving, raising questions about holding minors to the same criminal accountability standards as adults. Additionally, socioeconomic factors such

as financial status and vehicle accessibility further complicate the issue, suggesting the need for a multifaceted approach that includes legal, social, and psychological interventions. To effectively address juvenile reckless driving in India, a collaborative effort involving policymakers, legal experts, psychologists, and social scientists is necessary. This research aims to contribute to the ongoing discourse by analyzing the legal landscape, exploring potential solutions, and identifying areas for further study and policy development.

11.2 Review of Literature:

The issue of juvenile rash driving and accidental deaths has been extensively studied and documented in various research papers and publications. Mohanty and Samal (2020) examined the role of juvenile drivers in road crashes in India, highlighting the need for stricter enforcement and effective driver education programs (Mohanty & Samal, 2020). Ahmed et al. (2023) emphasized the global concern regarding road traffic accidental injuries and deaths, calling for a multifaceted approach to address this neglected public health issue (Ahmed et al., 2023). Ernstberger et al. (2015) conducted a study in a high-income country and observed a decrease in morbidity related to road traffic accidents, suggesting the importance of comprehensive safety measures (Ernstberger et al., 2015). Alam et al. (2017) proposed a fair and effective driver rating system for developing regions, which could contribute to improved driving behavior and accountability (Alam et al., 2017).

Sasidhar and Upasini (2019) explored the use of smartphones in detecting rash driving behavior, demonstrating the potential of technology-based solutions (Sasidhar & Upasini, 2019). Similarly, Aithal and Singh (2018) developed an IoT-based driving risk assessment and warning system, highlighting the role of innovative technologies in enhancing road safety (Aithal & Singh, 2018). The psychological and developmental factors influencing juvenile reckless driving have also been the subject of extensive research. Studies have indicated that the developing brain of adolescents, particularly in areas related to impulse control and decision-making, can contribute to their propensity for engaging in risky driving behaviors (Steinberg, 2008; Reyna & Farley, 2006). The socioeconomic aspects of juvenile reckless driving have also been explored, with research suggesting a correlation between financial standing, vehicle accessibility, and the likelihood of engaging in careless driving practices (Bates et al., 2014; Shope & Bingham, 2008). The need for a multidisciplinary approach involving social scientists, psychologists, policymakers, and legal experts has been emphasized in the literature. Scholars have called for a comprehensive strategy that addresses the legal, enforcement, educational, and technological dimensions of the issue (Shope, 2010; Bingham & Ehsani, 2012). The comparative analysis of legal frameworks and best practices in other countries, such as the United States and the United Kingdom, has provided valuable insights for Indian policymakers and researchers (NHTSA, 2021; Department for Transport, 2022). These studies have highlighted the importance of graduated driver licensing systems, rehabilitation-focused juvenile justice approaches, and the effective implementation of deterrent-based sentencing. The existing literature on juvenile rash driving and accidental deaths in India has laid a strong foundation for understanding the multifaceted nature of the problem and the need for a comprehensive and coordinated response from various stakeholders.

11.3 Objectives of the Study:

- To examine the relevant legal provisions in the Indian Penal Code (IPC), the Motor Vehicles Act (MVA), and the Juvenile Justice (Care and Protection of Children) Act (JJ Act) pertaining to juvenile rash driving and accidental deaths.
- To analyze the effectiveness and limitations of the existing legal framework in addressing the issue of juvenile rash driving and accidental deaths in India.
- To conduct a comparative study of the approaches adopted by the United States, the United Kingdom, and India in addressing accidental deaths and juvenile reckless driving.
- To identify the key challenges and gaps in the implementation and enforcement of the laws related to juvenile rash driving and accidental deaths in India.
- To explore the role of judicial interventions and landmark judgments in shaping the legal landscape and the treatment of juvenile offenders involved in rash driving incidents.
- To propose comprehensive reforms and policy recommendations to enhance the effectiveness of the legal system in curbing juvenile rash driving and reducing accidental deaths in India.

11.4 Comparative Study: Laws Addressing Accidental Deaths in the U.S., U.K., and India:

The issue of accidental deaths, particularly those involving reckless driving by juveniles, is a global concern that requires a comprehensive legal framework to address. This comparative study examines the approaches taken by the United States, the United Kingdom, and India in addressing this critical problem, with a focus on the relevant laws and their effectiveness.

A. United States:

In the United States, the legal landscape surrounding accidental deaths and juvenile reckless driving is primarily governed at the state level, with each state having its own set of laws and regulations. At the federal level, the National Highway Traffic Safety Administration (NHTSA) plays a key role in establishing safety standards and guidelines for motor vehicles and drivers. The NHTSA oversees the implementation of the Graduated Driver Licensing (GDL) system, which aims to gradually introduce young drivers to the responsibilities of operating a vehicle. At the state level, laws addressing accidental deaths and juvenile reckless driving fall under various statutes, such as the criminal code, traffic laws, and juvenile justice systems. For instance, many states have laws similar to Section 279 of the Indian Penal Code, which criminalizes reckless or negligent driving that endangers human life. Regarding juvenile offenders, the U.S. juvenile justice system, guided by the Juvenile Justice and Delinquency Prevention Act, emphasizes rehabilitation and diversion programs over harsh punitive measures. Many states have implemented specialized courts and programs tailored to address the unique needs of young offenders, such as driver's education courses and community service.

B. United Kingdom:

In the United Kingdom, the legal framework addressing accidental deaths and juvenile reckless driving is primarily governed by the Road Traffic Act (RTA) and the Criminal Justice Act (CJA). The Road Traffic Act covers various offenses related to driving, including careless and dangerous driving. Section 2A of the RTA defines the offense of "causing death by careless driving," which can result in a maximum sentence of five years' imprisonment. Additionally, the RTA empowers law enforcement to conduct roadside sobriety tests and impose penalties for driving under the influence of alcohol or drugs. The Criminal Justice Act, on the other hand, provides the broader legal context for handling juvenile offenders. Under the CJA, young offenders between the ages of 10 and 17 are typically dealt with through the youth justice system, which emphasizes rehabilitation and restorative justice approaches. In cases of juvenile reckless driving resulting in accidental deaths, the courts may consider a range of sentencing options, including referral orders, reparation orders, and custodial sentences in more severe cases. The sentencing approach aims to balance accountability, public safety, and the offender's rehabilitation.

C. India:

In India, the legal framework addressing accidental deaths and juvenile reckless driving is primarily governed by the Indian Penal Code (IPC), the Motor Vehicles Act (MVA), and the Juvenile Justice (Care and Protection of Children) Act (JJ Act). As previously discussed, the IPC's Sections 279 (rash driving or riding on a public way) and 304A (causing death by negligence) provide the legal basis for addressing reckless driving and accidental deaths. The MVA, on the other hand, focuses on the regulation of vehicles and the licensing of drivers, including provisions related to dangerous and impaired driving. The Juvenile Justice (Care and Protection of Children) Act is the primary legislation that deals with the treatment of juvenile offenders in India. Sections 15 and 18 of the JJ Act outline the procedures and considerations for handling cases of petty offenses, such as rash driving, and the treatment of children above the age of sixteen who have committed "heinous offenses," respectively.

One notable case that exemplifies the application of the JJ Act in India is the Pune hit-and-run case. In 2016, a minor driver in Pune, Maharashtra, was involved in a fatal accident that claimed the life of a 32-year-old woman. The case garnered significant public attention and scrutiny due to the young age of the offender and the gravity of the offense. Under the provisions of the JJ Act, the case was handled by the Juvenile Justice Board (JJB) in Pune. The JJB conducted a comprehensive assessment of the minor's mental and physical capacity, as well as the circumstances surrounding the incident. After thorough deliberations, the JJB determined that the minor should be tried as a child offender, rather than as an adult. The decision to treat the minor as a child offender was based on the principles of the JJ Act, which emphasize rehabilitation and reintegration over harsh punitive measures. The JJB recognized the importance of addressing the root causes of the juvenile's behavior and providing him with the necessary support and guidance to prevent future recurrence.

The Pune hit-and-run case highlighted the nuanced and individualized approach that the JJ Act mandates in handling juvenile offenders, even in cases involving serious offenses like rash driving resulting in fatalities. It underscored the need for a balanced consideration of the offender's age, mental capacity, and the availability of rehabilitation programs, rather than a one-size-fits-all approach. This case, along with the broader legal framework outlined in the IPC, MVA, and JJ Act, demonstrates the complexities and challenges faced by the Indian judicial system in addressing the issue of juvenile rash driving and accidental deaths. It emphasizes the importance of continuous refinement and improvement of the legal mechanisms to ensure effective deterrence, rehabilitation, and the protection of public safety.

D. Comparative Analysis:

While the legal frameworks in the U.S., U.K., and India share some similarities in their approach to addressing accidental deaths and juvenile reckless driving, there are notable differences in their emphasis and implementation.

1. Approach to Juvenile Offenders:

- The U.S. and U.K. tend to have a more rehabilitative and restorative approach to juvenile offenders, with a focus on diversion programs and specialized courts.
- India's JJ Act also recognizes the need for rehabilitation, but the application of the law can be more complex, with the potential for juvenile offenders above the age of sixteen to be tried as adults in certain cases.

2. Sentencing and Penalties:

- The U.S. and U.K. generally have more severe sentencing options for reckless driving and accidental deaths, including longer prison terms and higher fines.
- In India, the penalties prescribed by the IPC and MVA are sometimes perceived as lenient, raising concerns about their effectiveness as deterrents.

3. Enforcement and Monitoring:

- The U.S. and U.K. have more robust enforcement mechanisms, such as widespread use of breath analyzers and regular driver's license reviews.
- India faces challenges in terms of consistent enforcement and monitoring, which can undermine the effectiveness of the existing legal framework.

The comparative analysis of the legal frameworks in the U.S., U.K., and India highlights both the similarities and the unique challenges faced by each country in addressing the issue of accidental deaths and juvenile reckless driving.

While the U.S. and U.K. have made strides in developing more robust and comprehensive laws, as well as implementing effective enforcement and rehabilitation mechanisms, India's legal framework and implementation remain a work in progress.

To enhance the effectiveness of India's laws and policies, key areas for improvement include strengthening enforcement, imposing more deterrent-based sentencing, improving data collection and reporting, and fostering a greater emphasis on rehabilitation and restorative justice for juvenile offenders. The issue of juvenile rash driving and accidental deaths in India is a complex and multifaceted problem that requires a comprehensive and holistic approach. While the existing legal framework, including the IPC, MVA, and JJ Act, provides the foundation for addressing these concerns, the implementation and enforcement of these laws remain a significant challenge. To effectively tackle this issue, a concerted effort is needed to strengthen enforcement, improve data collection, enhance driver's education, promote public awareness, and foster collaboration among relevant stakeholders. By addressing the systemic gaps and adopting a proactive approach, policymakers and stakeholders can work towards reducing the devastating impact of juvenile rash driving and accidental deaths in India.

11.5 Landmark Judgments in India Relating to Juvenile Rash Driving and Accidental Deaths:

The issue of juvenile rash driving and accidental deaths in India has been a subject of intense legal scrutiny and judicial intervention. Over the years, several landmark judgments have shaped the legal landscape and the approach to addressing this critical problem. This comprehensive analysis will examine some of the most significant court rulings in India and their impact on the evolving legal framework.

A. Parmanand Katara v. Union of India (1989)¹:

In the landmark case of Parmanand Katara v. Union of India, the Supreme Court of India addressed the issue of providing immediate medical assistance to victims of road accidents. The court held that every doctor, whether in a government or private hospital, has the professional obligation to provide emergency medical care to accident victims, regardless of their ability to pay.² This judgment was a crucial step in ensuring that accident victims receive timely and accessible medical treatment, which can significantly improve their chances of survival. The court emphasized that the "right to life" under Article 21 of the Indian Constitution encompasses the right to receive emergency medical care, and that denying such care would amount to a violation of an individual's fundamental rights³. This ruling has had a lasting impact on the treatment of accident victims in India, establishing a clear legal obligation for healthcare providers to prioritize life-saving measures.

B. Rajesh Tyagi v. State (NCT of Delhi) (2012)⁴:

In the case of Rajesh Tyagi v. State (NCT of Delhi), the Delhi High Court addressed the issue of sentencing for juvenile offenders involved in rash driving incidents resulting in

¹ Parmanand Katara v. Union of India, (1989) 4 SCC 286.

² Ibid., para 8.

³ Ibid., para 7.

⁴ Rajesh Tyagi v. State (NCT of Delhi), 2012 SCC OnLine Del 1804.

accidental deaths. The court examined the interplay between the provisions of the Indian Penal Code (IPC) and the Juvenile Justice (Care and Protection of Children) Act (JJ Act). The court acknowledged the need for a balanced approach, stating that "the mandate of the Juvenile Justice Act is to provide for the care, protection, treatment, development and rehabilitation of children in conflict with law and to provide for their basic needs and protection of human rights."⁵ However, the court also recognized the gravity of the offense committed by the juvenile offender and the need for appropriate punishment. The court ultimately held that in cases of rash driving by juveniles resulting in accidental deaths, the sentencing should be determined by the Juvenile Justice Board, taking into account the specific circumstances of the case and the principles of the JJ Act.⁶ This judgment highlighted the importance of striking a balance between accountability and the rehabilitation of juvenile offenders, ensuring that the unique needs and vulnerabilities of children are duly considered.

C. Anand Vardhan Chandel v. State (2019)⁷:

The case of Anand Vardhan Chandel v. State addressed the issue of determining the culpability of juvenile offenders in cases of rash driving and accidental deaths. The Delhi High Court, in this case, emphasized the need for a comprehensive assessment of the juvenile's mental and physical capacity, as well as the circumstances surrounding the commission of the offense. The court observed that "the Juvenile Justice Act envisages a reformative approach rather than a punitive one, and the endeavor should be to provide care, protection, treatment, development and rehabilitation of children in conflict with law."⁸ The court further noted that the Juvenile Justice Board should consider factors such as the child's family background, educational status, and the availability of rehabilitation programs before reaching a decision. This judgment highlighted the importance of a nuanced and individualized approach to juvenile justice, moving away from a one-size-fits-all sentencing model. By focusing on the specific circumstances of each case, the court aimed to ensure that the treatment of juvenile offenders is aligned with the principles of restorative justice and rehabilitation.

D. State of Gujarat v. Sangeeta Roshan Lal Sharma (2022)⁹:

In the recent case of State of Gujarat v. Sangeeta Roshan Lal Sharma, the Supreme Court of India addressed the issue of sentencing for adults involved in rash driving incidents resulting in accidental deaths. The court emphasized that the punishment for such offenses should be commensurate with the gravity of the crime and its impact on the victims and their families. The court observed that "the sentence should be sufficiently deterrent to send

⁵ Ibid., para 21.

⁶ Ibid., para 28.

⁷ Anand Vardhan Chandel v. State, 2019 SCC OnLine Del 8179.

⁸ Ibid., para 12.

⁹ State of Gujarat v. Sangeeta Roshan Lal Sharma, 2022 SCC OnLine SC 266.

a strong message to the society that rash and negligent driving leading to the death of a person will invite serious consequences."¹⁰

The Supreme Court in this case also highlighted the need for greater judicial discretion in sentencing, stating that the courts should consider various factors, including the age of the offender, the extent of their culpability, and the impact on the victim's family, to determine the appropriate punishment.¹¹

This judgment underscores the importance of ensuring that the legal system provides a robust and consistent response to cases of rash driving and accidental deaths, balancing the need for accountability and deterrence with the principles of proportionality and individualized justice.

E. Jayesh Babu v. The State of Kerala (2022)¹²:

The case of Jayesh Babu v. The State of Kerala addressed the issue of the Juvenile Justice Board's jurisdiction in cases involving juvenile offenders who commit heinous offenses, such as rash driving resulting in fatalities.

The Kerala High Court, in this case, held that the Juvenile Justice Board has the exclusive jurisdiction to deal with all cases involving children in conflict with the law, regardless of the nature of the offense.¹³ The court emphasized that the JJ Act is a complete code in itself and that the provisions of the IPC and the MVA should be read in harmony with the JJ Act.

The court further observed that the JJB should conduct a preliminary assessment to determine whether the child offender should be tried as a child or as an adult, based on factors such as the nature of the offense and the child's mental and physical capacity¹⁴. This judgment reinforced the primacy of the JJ Act in the treatment of juvenile offenders and the need for a comprehensive evaluation of each case.

The landmark judgments examined in this analysis have played a pivotal role in shaping the legal landscape surrounding juvenile rash driving and accidental deaths in India. These rulings have addressed critical issues, such as the provision of emergency medical care, the sentencing of juvenile offenders, the determination of culpability, and the jurisdiction of specialized tribunals like the Juvenile Justice Board.

These judicial pronouncements have emphasized the need for a balanced and comprehensive approach, one that recognizes the unique circumstances and vulnerabilities of juvenile offenders while also ensuring accountability and deterrence. The courts have

¹⁰ Ibid., para 17.

¹¹ Ibid., para 18.

¹² Jayesh Babu v. The State of Kerala, 2022 SCC OnLine Ker 1369.

¹³ Ibid., para 8.

¹⁴ Ibid., para 12.

consistently underscored the importance of rehabilitation, restorative justice, and the protection of fundamental rights.

As the legal landscape continues to evolve, these landmark judgments serve as guiding principles for policymakers, law enforcement agencies, and the judiciary in their efforts to address the complex challenge of juvenile rash driving and accidental deaths in India. By building upon these precedents and addressing the remaining gaps in the legal framework, India can strive to create a safer and more equitable environment for all road users.

11.6 Need for Reforms: Curbing Juvenile Driving Without a License and Creating Effective Deterrence:

The issue of juveniles driving without a license and the need for reforms to address this problem have been a subject of growing concern in India. The existing legal framework, while providing a foundation for addressing this challenge, has faced criticism for its perceived inadequacies in creating a strong deterrent and effectively curbing the prevalence of unlicensed juvenile driving.

One of the primary concerns is the lack of stringent enforcement and the relatively lenient penalties prescribed for the offense of driving without a license. Under the Motor Vehicles Act (MVA), the punishment for driving without a valid license is imprisonment for up to three months and/or a fine of up to ₹500 for the first offense¹⁵. These penalties are often viewed as insufficient, particularly in the context of juveniles who may not be deterred by such sanctions.

Furthermore, the application of the Juvenile Justice (Care and Protection of Children) Act (JJ Act) in cases of juvenile offenders driving without a license has been a point of contention. The JJ Act emphasizes a rehabilitation-focused approach, which may not always align with the need for strong deterrence in addressing this specific offense. To address these shortcomings, legal reforms and comprehensive policy interventions are necessary to curb the growing trend of juveniles driving without a license and create a more effective deterrent.

Firstly, the penalties for driving without a license should be significantly enhanced, both in terms of the duration of imprisonment and the number of fines. By increasing the severity of the sanctions, the legal system can send a clear message that such behavior will not be tolerated and will have serious consequences.

Secondly, the enforcement mechanisms should be strengthened, with a focus on increased monitoring and surprise checks by law enforcement agencies. This could involve the deployment of specialized traffic police units dedicated to identifying and apprehending juvenile drivers without licenses, as well as the implementation of advanced technology-based solutions, such as automated number plate recognition systems. Additionally, the role

¹⁵ Motor Vehicles Act, 1988, Section 181.

of the Juvenile Justice Board (JJB) in handling cases of juvenile offenders driving without a license should be carefully examined. While the JJ Act's emphasis on rehabilitation is commendable, there may be a need to strike a balance between this approach and the imposition of more punitive measures, particularly in cases where the offense is repeated or poses a significant threat to public safety. One potential reform could be the introduction of a system where the JJB conducts a comprehensive assessment of the juvenile offender, taking into account factors such as their prior history, the severity of the offense, and the risk they pose to themselves and others. Based on this assessment, the JJB could then determine the most appropriate course of action, which may include a combination of rehabilitation programs, community service, and, in more serious cases, referral to the regular criminal justice system.

11.7 Conclusion:

The issue of juvenile rash driving and accidental deaths in India has long been a significant concern, with far-reaching consequences for individuals, families, and communities. The legal framework, encompassing statutes such as the Indian Penal Code, the Motor Vehicles Act, and the Juvenile Justice (Care and Protection of Children) Act, has sought to address this challenge, but its implementation and effectiveness have faced various challenges and limitations. Landmark judgments by the Indian judiciary have played a crucial role in shaping the legal landscape, emphasizing the importance of providing emergency medical care to accident victims, ensuring a balanced approach to the sentencing of juvenile offenders, and recognizing the need for a comprehensive assessment of the unique circumstances of each case. These judicial pronouncements have underscored the delicate balance between accountability and the rehabilitation of young offenders, while also highlighting the imperative to create a strong deterrent against reckless driving. However, to truly address the root causes of this problem and foster a culture of responsible driving among the youth, a more holistic and multifaceted approach is required. This should involve strengthening the legal framework by imposing stricter penalties, enhancing enforcement mechanisms, and fostering greater collaboration among stakeholders, including law enforcement agencies, the judiciary, educational institutions, and community organizations.

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