
JUSTIFICATION OF PUNISHMENT FOR CHILD OFFENDERS IN MALAYSIA: A SYSTEMATIC LITERATURE REVIEW

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ABSTRACT

In Malaysia, children in conflict with the law may be punished under Syariah or civil legal framework as to conform with the social norms. The Syariah and Civil courts in Malaysia practiced in the different structures, procedures, and jurisdictions as Malaysia practiced a dual system of law. Therefore, this article aims to identify the justification of punishment practiced by both courts in sentencing the child offenders in Malaysia. There are nine sources have been used as a database in screening the past research articles starting from years of 2010 until 2021. The systematic literature review consists of search strategies, study collection, data collection, and analysis for the articles obtained. A sum of 18 articles was assessed for eligibility through criteria such as year of publication, languages, and has met the required elements. This article indicates that both courts tend to impose a punishment consisting of rehabilitative methods to protect the best interest of the children. Thus, further research is needed to analyze the differences between Syariah and the Civil Court regarding implementing of rehabilitation theory as a justification of punishment for the child offenders in Malaysia.

Keywords: *child offenders, civil, Syariah, punishment, rehabilitation*

Introduction

Since independence, the government of Malaysia has always strived to put on Malaysia in a well-developed country economically, socially, and politically that Malaysians can be proud of. However, the issue of juvenile delinquency is an ever-present topic, as evidenced by newspaper reports. It dominates discussion at various levels and raises concern among the public, politicians, and law enforcement officers.

The histories of juvenile delinquency have illustrated the efforts of the criminal justice system of Malaysia in upholding justice and protect the welfare of child offenders. Therefore, Child Act 2001 (Act 611) has been governed, which served to consolidate the other three statutory provisions, which are Juvenile Courts Act 1947 (Act 90), the Women and Girls Protection Act 1973 (Act 106), and the Child Protection Act 1991 (Act 468). Act 611 was meant to protect further the child offenders (Nahid Ferdousi, 2014).

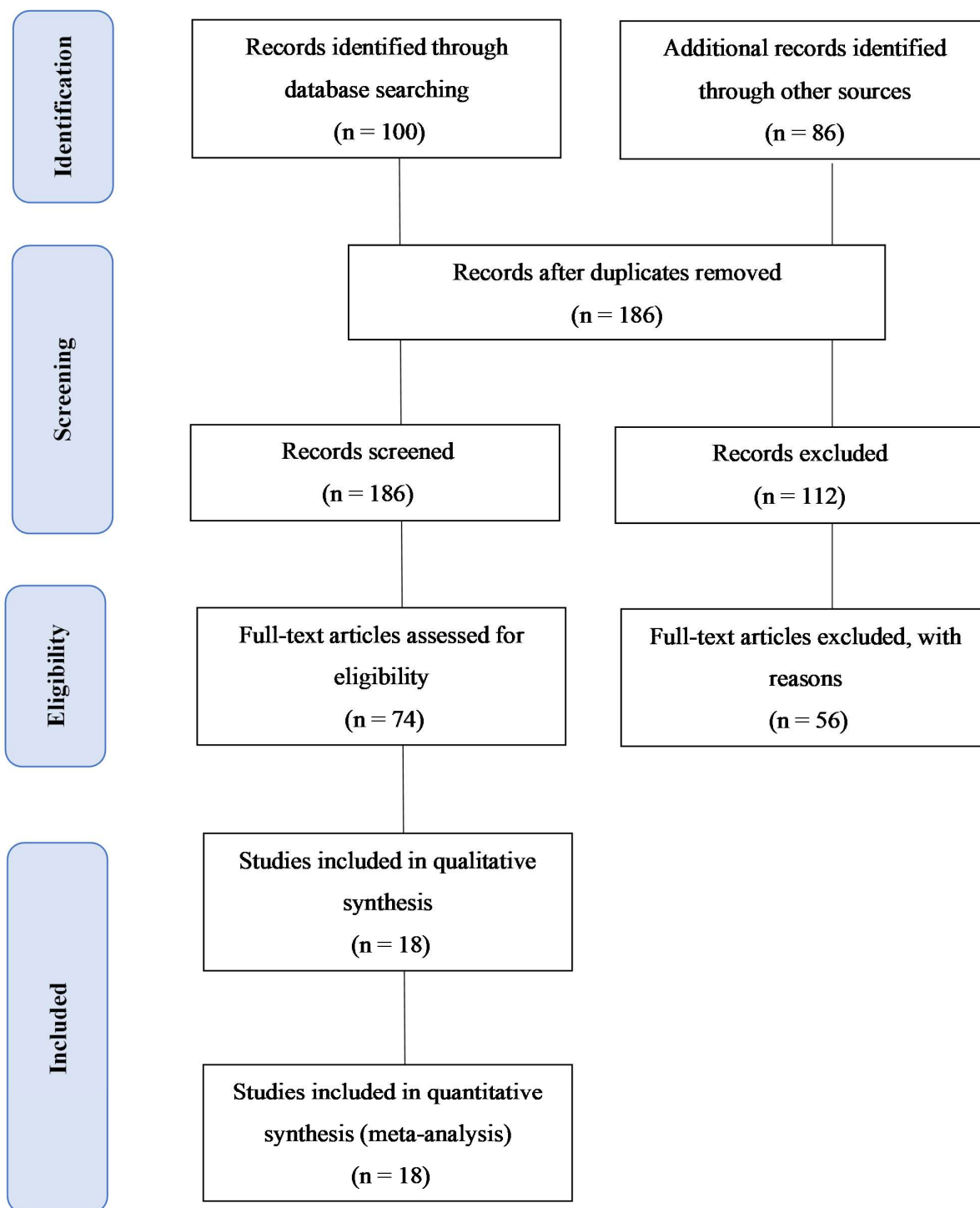
Consequently, a child with a conflict with the law is entitled to obtain protection under Act 611. The Court for Children has jurisdiction for hearing, determining, or disposing of any charge

against a child offender. However, Malaysia is a country that is practicing a dual system of law. Therefore, the Syariah court also has power and jurisdiction over a child offender who professes the religion of Islam and has been charged in any offences under the Syariah Criminal Offences as stated in Article 121(1A) Federal Constitution. Therefore, this article aims to identify the justification of punishment practiced by the both courts in sentencing child offenders in Malaysia.

Research Methodology

To develop the research, a literature review is critical to identify any possible research gaps and areas that are needed and significant to be carried out (Nohman Khan et al., 2020). Therefore, the systematic literature review (SLR) used a systematic method to identify, selecting, collecting, and analysing the data from previous articles and journals.

Besides, this article used the flow diagram of Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA) in analysing the data obtained. This flow diagram consists of four stages which are identification, screening, eligibility, and inclusion. This method is very relevant to evaluating the existing articles and journals related to child offenders in systematic methods. Besides, this method will explain the gaps of these studies that need to be fulfilled (Abur & Muhammad, 2019). Therefore, this article has analysed books, journals, and articles from 2010 to 2021. The following is the flow diagram of the PRISMA method:



Figures 1 shows the flow diagram of PRISMA method

Based on the diagram above, four stages have been assessed and concisely explained as following:

Phase 1: Identification

The following articles were analysed through nine (9) databases, namely Science Direct Journal, Scopus Indexed Journals, UKM Journal Article Repository, Research Gate, Journal of Shariah Law Research - UM e-Journal, Human Sustainability Procedia Series UTHM, UTM Institutional Repository, Journal of Forensic Sciences & Criminal Investigation (JFSCI) and Kanun: Jurnal Undang-Undang Malaysia.

Phase 2: Screening

At the first stage of collecting articles, there were 186 articles identified through database searching. All the records were identified through search configurations of "child offender, rehabilitation theory, and Malaysia." Meanwhile, a journal published in Malay language databases such as Kanun: Jurnal Undang-Undang Malaysia and UKM Journal Article Repository used the search configurations, namely "pesalah kanak-kanak *pemulihan* and *juvana*."

Phase 3: Eligibility

Next, the eligibility method was performed, and a total of 112 articles were excluded from the records and made the total number of articles assessed for eligibility was 74 articles. Out of that number, 56 articles were removed based on the four main elements that had been considered to ensure the studies were included in the qualitative synthesis. The main element considered in analysing the articles that have been collected was the year of publication. Articles included in the qualitative synthesis were articles published from the year of 2010 until 2021. Determining the year of publication is necessary so that the articles obtained and included in the qualitative synthesis are still relevant as the changes of the subject in this study will occur from time to time.

Besides, the articles' languages are essential to be set as the main criteria in the qualitative synthesis whereby the articles were published in English or Malay languages. In addition, the articles must be available and accessible online as the online library research was performed. Lastly, the finding of the research was the elements assessed for including in the qualitative synthesis. The discussion and findings in the articles must conform with the theme of the literature review. The theme of the literature review was constructed based on the objectives of my research paper as it will indicate the outcome of the research gap of my research area. Therefore, the articles were excluded due to several reasons, such as the full article cannot be accessed online, or the discussion and findings of the articles do not fit the theme outlined as the study was mainly for a particular place, issues, or selected crimes only.

Phase 4: Included

The following are the list of articles included based on the elements explained:

No.	Authors	Research Title	Year of Publication
1.	Azizi Yahaya, Sharin Hashim and Jesmin Bt Abd Wahab	Keberkesanan Program-Program Pemulihan Tingkah laku Di Taman Seri Putri Batu Gajah Dan Kompleks Dar-Assa'adah.	2010

		<i>Unpublished: Universiti Teknologi Malaysia Institutional Repository. pp. 1-16.</i>	
2.	Tony Ward	Is Offender Rehabilitation A Form Of Punishment?. <i>British Journal of Forensic Practice.</i> Volume 12 Issue 4. pp 5-11	2010
3.	Mohd. Al-Adib Samuri	Community Service Order for Children in Conflict with the Law: Theory, Legal Framework and Prospect in Malaysia. <i>Jurnal Undang-Undang dan Masyarakat (JUUM).</i> Volume 16. pp 5-18.	2012
4.	Mohd Al-Adib Samuri, Zuliza Mohd Kusrin, Anwar Fakhri Omar, Noor Aziah Mohd Awal, Fariza Md. Sham	Legal Issues in Sentencing Child Offenders in Malaysia. <i>Advances in Natural and Applied Sciences.</i> Volume 6, Issue 7, Pages 1093 - 1098	2012
5.	Mohd Al Adib Samuri. Zuliza Mohd Kusrin. Noor Aziah Mohd Awal. Amir Husin Bin Mohd Nor. Salasiah Binti Hanin Hamjah and Zaizul Bin Ab Rahman	The Rehabilitation Theory in Adjudicating Child Offenders and Its Application in Malaysia. <i>Asian Social Science.</i> Published: Canadian Centre of Science and Education. Vol. 9. October. pp 156-163.	2013
.6.	Anita Abdul Rahim, Tengku Noor Azira Tengku Zainudin and Ramalinggam Rajamanickam	The Involvement of School Students in Criminal Activities and Its Position in the Malaysian Law. <i>Mediterranean Journal of Social Sciences MCSER.</i> Vol 6 No 4 S3. August. Pp 403-407.	2015
7.	Adibah Bahori, Prof. Madya Dr. Siti Zubaidah Ismail and Nik Khazarita Nik Md Khalib	Keperluan Hukuman Alternatif Terhadap Penyelesaian Krisis Akhlak Di Malaysia; Analisis Pendekatan Undang-Undang Syariah. <i>Prosiding Persidangan Antarabangsa Kelestarian Insan 2017 (INSAN2017).</i> November. pp 2-8.	2017
8.	James Bernard, Katie Haas, Brian Siler, and Georgie Ann Weatherby	Perceptions of Rehabilitation and Retribution in the Criminal Justice System: A Comparison of Public Opinion and Previous Literature. <i>Journal of Forensic Sciences & Criminal Investigation.</i> Volume 5 Issues 3. October. Pp 7.	2017
9.	Mohd Abu Hassan Abdullah, Ahmad Azam Mohd	Pesalah Muda dalam Kes Jenayah Syariah di Malaysia: Kajian ke atas Had Umur Pesalah serta Hukuman Bersifat Pemulihan dari	2017

	Shariff, and Mohamad Azhan Yahya	Perspektif Prinsip Syariah. <i>Journal: Current Legal Issues</i> . Volume 1. pp 5-8.	
10.	Noor 'Ashikin Hamid, Shariffah Nuridah Aishah Syed Nong Mohamad, Lily Suryati Mohd Jamil, and Nur Amani Pauzai	Khalwat (Close Proximity) Among Youngsters in Malaysia and Aceh: A Study Concerning Shariah Compliance. <i>KANUN: Jurnal Undang-Undang Malaysia</i> . Volume 27 No 2. July. Pp 297-311.	2017
11.	Tamara Aggie Muyobela and Marianne Strydom.	The Rehabilitation of Incarcerated Child Offenders: Challenges Faced by Social Welfare Officers in Zambia. <i>Social Work/Maatskaplike Werk</i> . Vol 53 No 4; Issue 7. pp 541.	2017
12.	Nazirah Hassan & Daniella Mokhtar	Bullying amongst Young People in Juvenile Rehabilitation Institutions. <i>Jurnal Psikologi Malaysia</i> . Volume 32, No. 3. pp 146-158	2018
13.	Nor'asyikin Hamzah & Raihanah Hj. Abdullah	Convention on the Rights of the Child 1989: Literature Review. <i>Journal of Shariah Law Research</i> . Volume 3. No. 2. pp 157-176	2018
14.	Jane Mulcahy	The Evolution of Punishment and Rehabilitation. <i>Irish Criminal Law Journal</i> . pp 2-14	2019
15.	Siti Hajar Abu Bakar Ah, Haris Abdul Wahab & Siti Balqis Mohd Azam	The Application of Cognitive Behavioral Therapy into An Institutional-Based Therapeutic Rehabilitation Program for Out-of-Wedlock Adolescent. <i>Jurnal Sains Kesihatan Malaysia</i> . Volume 17, No. 1. pp 83-90	2019
16.	Fatin Adha Murad, Mohammad Rahim Kamaluddin & Norruzeyati Che Mohd Nasir	The Relationship of Dysregulation of Emotion and Delinquent Behaviour among Teenagers: Attachment to Community as Moderator. <i>Akademika</i> . Volume 90, No. 2. pp 3-16	2020
17.	Nazirah Hassan, Fauziah Ibrahim, Nor Shaffika Izzaty Zaiedy Nor & Daniella Mokhtar	Staff-inmate Relationship and Aggressive Behavior among Young Inmates in Juvenile Justice Institutions. <i>Jurnal Psikologi Malaysia</i> . Volume 34, No. 2. pp 157-167	2020
18.	Nursyahidah Ibrahim, Nurul Husna Mansor and Yusmini Md Yusoff	Classifications of Moral Rehabilitation for Sex Offenders in Malaysia: A Literature Review. <i>Jurnal Usuluddin. The University of Malaya</i> . Volume 2. pp 1-23	2020

Findings of the Research

The analysis on the justification of punishment for child offenders in Malaysia was made according to the selected literature using the SLR process. Therefore, the result of the literature review on this issue was classified into four themes. The following are some of the findings of the literature review:

Theme 1: Justification of Punishment

Research by Tony Ward (2010) mentioned that there are consequences of the overlap between punishment and rehabilitation whereby the term "punishment" defines as a psychological technique designed to eliminate any inappropriate behaviours or enforcement by the authorities to a person convicted of any offence by having five main elements namely authorized, intentional, reprobative, retributive and harmful. As such, the rehabilitation theory does not meet all punishment criteria as commonly understood that rehabilitation directly focused on helping offenders have a better level of well-being. However, the researcher found that some parts of rehabilitation contain elements that are consistent with the element of punishment, and therefore, clinicians should more critically impose any theory of punishment as Duff's communicative theory of punishment is more clinician friendly.

Theme 2: Definition of Rehabilitation Theory

A study conducted by Tamara Aggie Muyobela and Marianne Strydom (2017) stated that the term rehab clearly defines it as a process of helping a person to adjust towards society or to restore a person to a former state. Nevertheless, this term has been used in various substances as well as a principle and justification of punishment. Other studies reported similar findings.

A research performed in certain criminal courts and applicable over youth offender in age under 18 found that the rehabilitative punishment towards these offenders have reduced the possibility for them to commit any crimes in the years after the sentence has been imposed. It was emphasized that when discussing the option of rehabilitation, it should be reserved for nonviolent punishment. By locking someone up, a person is not changed, but rehabilitation gets one what they need and potentially changes their lives (James Bernard et al., 2017).

Theme 3: Rehabilitation Theory as A Justification Punishment for Child Offenders

Many factors drive rehabilitation theory as the justification of punishment over child offenders. The rehabilitation theory focuses on two elements: to rehabilitate the child offenders and his reintegration into society. Well, research has been conducted by Mohd Al Adib Samuri et al. (2013) clarified that a child that has been convicted of any wrongdoing has to be imposed on legal punishment to ensure that they obey the societal norms. Regarding the punishment, this study agreed that rehabilitation theory is the most suitable and appropriate justification of punishment imposed on child offenders by considering the aspects of education, societal integration, and rehabilitating them of their criminal mentality. Therefore, an application of this theory in Malaysia has been discussed by focusing on two orders: the approved schools and community services. Both orders are more likely to be practiced by many countries, including those that adhere to a standard law system.

About Syariah studies, Mohd Abu Hassan Abdullah et al. (2017) have performed a study on the age limit of child offenders in accordance with the Syariah principle and Enactment of State

in Malaysia. This study found that the Syariah law command to use the term of a youthful offender in the provision, but the age limit is still agreeable with the term of child offender defined under Act 611. Besides, the results of interviews conducted with Syarie judges of Penang and Terengganu were found that the Syariah courts neither impose the punishments of fine nor imprisonment but are more likely to impose a punishment that will rehabilitate the young even though there is a lack of uniformity towards the implementation of alternative punishments. However, this punishment is still considered appropriate to be imposed on child offenders. The judges said that it is vital to have an appropriate alternative punishment for young offenders to ensure the sentence that has been imposed consists of retributive and rehabilitative.

Other studies mentioned comparable findings. Mohd. Al-Adib Samuri (2012) has researched community service as punishment for child offenders who conflict with the law. This article found that the community service order is a punishment under rehabilitation theory whereby an order leads to upholding justice and protecting the child offenders' best interest. Furthermore, this article viewed that the objectives of this order is to develop a good attitude of the child as to have the competence behaviour to be a responsible person in the future. This study in line with Caputo's model in explaining the purpose and implementation of this order, which is focused on the theoretical, legal framework and the implementation of the order, which helps toward enforcement at the level of civil provisions, which still limits the implementation over Syariah courts. However, the guidelines provided should be a reference.

Besides, a study by Adibah Bahori et al. (2017) found that the Syariah court is needed for the alternative punishment over child offenders as the punishment of imprisonment and fine are not adequate to prevent and address the moral crises involving youthful offenders. This study stated that imprisonment may be taken as a punitive method over child offenders, but the punishment of fine may not leave a severe impact on them. Therefore, it is essential to have uniformity to address other alternative punishment in terms of rehabilitation, such as community service so that, any offences related to ethics, especially childbirth and sexual intercourse out of wedlock, can be prevented. Moreover, the author viewed that implementing rehabilitation orders is the best medium in addressing the moral crisis in Malaysia.

There is a study conducted by Noor Ashikin Hamid et al. (2015) regarding the comparative penalty that has been imposed on child offenders in Malaysia and Aceh, Indonesia. This study found that the punishments outlined under the Syariah Criminal Offences of Malaysia need to be reviewed. This is because the punishment imposed, which is a fine not exceeding RM5000 or imprisonment not exceeding three years or whipping not exceeding six times or any combination thereof, is unable to prevent the child offender from committing any crimes in the years after the sentence is imposed. Besides, the researcher suggested that the state government should build a religion-oriented rehabilitation center for Syariah child offenders whereby the child will be provided with education and rehabilitative method while waiting for the trial to be completed, which is an issue that has been discussed as the period for a trial takes too long for a judgment. Thus, the authors argued that type of punishment that should be practiced by Syariah court is placing the child offenders in the rehabilitation centre. In the centre, the child will undergo any counselling or rehabilitation method. This punishment is more appropriate to be practiced over juvenile offenders than imprisonment.

Theme 4: The Implementation of Rehabilitation Theory in Civil and Syariah Law

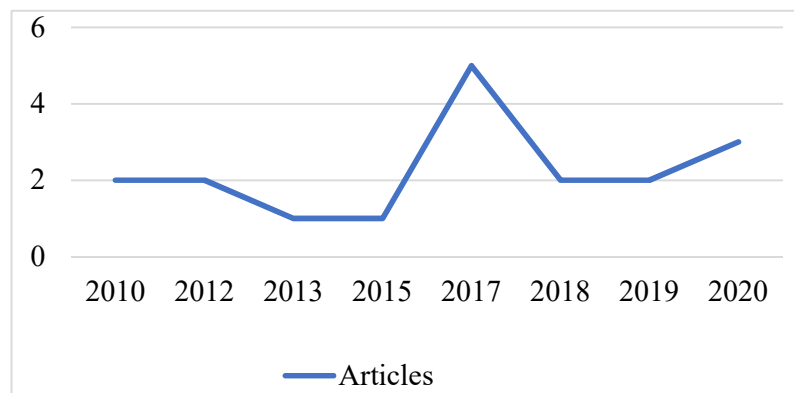
A study performed by Anita Abdul Rahim et al. (2015) stated that the Court for Children has the power to order such punishment over child offenders by sending them to the approved school in which such Court viewed that the offender is needed for rehabilitation even though the

offence committed is not severe in nature. This is important as to protect the best interest of the child in order to instil discipline as those who are subjected to detention for such term and under such instruction and discipline. This is most conducive to his reformation, as stated under section 67 of the Child Act 2001. According to section 2 of this Act, approved school means a school established or appointed under section 65 and includes a centre. The approved school may be established or appointed by the Minister for education purposes and training and detention of children.

About the approved school in Syariah law, a study by Nursyahidah Ibrahim et al. (2020) has listed all the approved schools established and run by several parties such as the government, non-governmental (NGO), and private. Among them are Raudhatus Sakinah (JIM), Baitul Islah Perkid, Rumah Perlindungan and Darul Wardah Women's Rehabilitation (ABIM), Shelter Center Wanita Baitul Ehsan (MAIS), Taman Seri Puteri (JKMM), Hostel Akhlak (JKMM), Rumah Puteri Arafiah (PERKAWANIS), Rumah Baitus Solehah Sanctuary, Baitul Fiqh Sanctuary, Dar Assaadah (MAIWP), Rumah Harapan School of Hope (MAIM), Malaysian Prisons Department (JPM) and others. Through the establishment of rehabilitation institutions and correctional centres, recovery modules have been set out as the guidance and direction for physical and spiritual recovery for those convicted of any offences related to social behaviour. The vital elements need to be given attention in rehabilitating the offenders are religious or spiritual, rehabilitation based on Islamic counselling, rehabilitation based on the integration of training vocational and educational as well as rehabilitation based on physical and social development.

A study was conducted at Henry Gurney School Teluk Mas, Henry Gurney School Batu Gajah, and Tunas Bakti School Sg. Iron regarding the effectiveness of those rehabilitation institutions. According to the research by Aziz Yahya et al. (2010) conducted at Taman Seri Puteri Batu Gajah, Perak and Kompleks Dar-Assa'dah, Kuala Lumpur. This study used the same method as previous literature which questionnaires collected all the data. However, the result found that the facilities and counselling programs were less effective than vocational, co-curricular, and religious programs.

Discussion



The figure above shows the frequency of selected articles published from the year of 2010 until 2020. However, there are few articles published have explicitly discussed the punishment for child offenders in Malaysia according to Syariah and civil law. Besides, most of the articles obtained were discussed from civil law's perspective. Therefore, more research on Sharia law point need to be conducted. Moreover, most of the Syariah studies focus more on civil and Court proceedings,

whereas Malaysia is practicing a dual legal system. Therefore, according to Syariah law, a total number of academic discussions regarding the child offender need to be enhanced.

Referring to figure 1 of the PRISMA method, there were 186 articles identified through nine databases searching on this research area. Starting from 2017, the number of articles is increasingly in demand. This is because the changes in the children's morals, behaviours, and development have occurred from time to time according to the current development. Therefore, further research specifically in punishment for child offenders is needed so that the children's best interest continues to be preserved.

It is undeniable that the effectiveness of the rehabilitation theory as a justification of punishment over child offenders is a critical issue to be discussed. Measuring the effectiveness is highly subjective, and certain conditions need to be fulfilled before it can be considered a practical or non-effective punishment (Mohd Al Adib Samuri et al., 2013). Therefore, research studies on the current implementation methods should be conducted so that the research of effectiveness may be carried out whereby the changes in implementation methods will occur from time to time depending on the best interest of the child offenders and the needs of the community

Conclusion

In conclusion, the scholarly articles found that rehabilitation is an appropriate theory to uphold punishment for child offenders in Malaysia. Based on the systematic literature review, research on the subtopic of punishment for child offenders is very necessary to be carried out because it is a subjective matter and requires continuous evaluation. The issues related to child offenders are relevant subjects to be studied by researchers so that the children's best interest continues to be preserved in line with the development of children's behaviour. Therefore, further research is needed to explain the comparison between civil and Syariah law in Malaysia regarding implementing rehabilitation theory as a justification of punishment for child offenders as Malaysia is practising a dual system of law.

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