

Children's Curfew Law in Malaysia: A Boon or A Bane?

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Abstract: *A children's curfew law is a regulation designed to restrict the presence of children in public places during specific hours. The primary objective of this law is to decrease the likelihood of children becoming involved in criminal activities either as perpetrators or victims. As of now, Malaysia has not implemented any children's curfew law. This article seeks to explore the historical context of children's curfew laws, their effectiveness in the United States, and the feasibility of introducing such legislation in Malaysia, considering Article 9 of the Federal Constitution. The article concludes that a children's curfew law aligns with Article 9 as it aims to safeguard the well-being and safety of children, without indiscriminately restricting children's right to movement. Additionally, the government, acting as *parens patriae*, assumes a protective role in caring for children and supporting the parental responsibility of family institutions.*

Keywords: children, curfew law, freedom of movement, best interest

1. Introduction

It is a well-accepted notion that children are fundamentally different from adults (Herring, 2023). Compared to adults, children are seen as physically weaker, less developed, with fewer intellectual and cognitive skills, more vulnerable, and lacking advanced reasoning abilities (Norozi & Moen, 2016). The primary concern as regards to children, particularly within society and lawmakers, is juvenile delinquency (Zhang et al., 2024). Between the late 1800s and early 1900s, as society shifted from an agrarian to an industrial economy, and as increasing numbers of children from lower social classes started to roam the streets and engage in misbehavior, the more privileged upper classes grew increasingly concerned about the rise of juvenile delinquency (Bates & Swan, 2020).

The establishment of the juvenile justice system, situated at the crossroads of youth policy and criminal law, seeks to address the growing issue of juvenile delinquency. This system must strike a balance between youth policies that view children as immature, vulnerable, and underdeveloped, and crime policies that treat juvenile offenders as near-adults who should be held accountable for their actions (Field, 2019). In Malaysia, the issue of juvenile delinquency is widely recognised as a significant concern in Malaysia, prompting governmental intervention (Zakaria et al., 2022). Recent statistical data reveals that in 2021, there were 3,457 reported cases of children participating in criminal activities, predominantly associated with

drug abuse (30.4%), traffic violations (23.1%), acts causing bodily harm (14.1%), and property-related offences (12.1%) (Department of Statistics, Malaysia, 2022).

Several factors have been linked to instances of juvenile criminal behaviour in Malaysia. These factors include family estrangement, economic difficulties, limited religious understanding, peer group influence, criminal-prone environment, and individual factors like low self-esteem, mental and physical health issues, and limited educational attainment (Kassim, 2006). A study conducted in 2003 by the United States Department of Justice highlights the connection between early delinquency and subsequent involvement in criminal activities during young adulthood. According to this research, a significant proportion (52 to 57 percent) of children who demonstrated delinquent behaviour, particularly those engaged in violent offences, continued to participate in criminal behaviour until the age of 25 (Loeber, 2003). This implies that juvenile delinquency functions as an indicator of future criminal conduct. Children who display behaviours such as school absenteeism, theft, dishonesty, aggression, and running away face an elevated risk of becoming involved in criminal activities in their adult years (Flores, 2003).

In Malaysia, the escalating issue of juvenile delinquency has raised significant concern, marked by a rising number of cases involving severe offences such as murder, substance abuse, violence, armed robbery, and sexual crimes, as noted by Hussin (2007), Mallow (2015), and Tai et al. (2019). Public discussions, media coverage, and the priorities of law enforcement agencies have been dominated by conversations about juvenile delinquency. Offences committed by minors often spark controversy and garner extensive media attention, as highlighted by Ahmad Badayai et al. (2016). Notably, in 2003, a 13-year-old boy was convicted by the Kuala Lumpur High Court for the brutal murder of his tutor's daughter, subjected to more than 20 vicious attacks (Ng, 2003). The nation was further shocked in 2017 by a tragic arson-murder incident at Darul Ittifaqiyah Tahfiz, resulting in 23 casualties. In this case, one of the accused, who was 16 at the time of the offence, was found guilty of murder by the High Court (Karim, 2020). The Children Statistics (2015 – 2019) published by the Ministry of Women, Family, and Community Development reveal a disconcerting trend in juvenile crimes where in 2015, there were 4,669 cases recorded, which increased to 4,886 in 2016 and 5,443 in 2017. A slight decrease was reported in 2018 (5,294 cases) and 4,833 cases in 2019.

Simultaneously, children are more susceptible to becoming targets of criminal activities and predatory actions owing to their inherent vulnerabilities and reliance on adults, as acknowledged in prior research (Lewitt & Baker, 1996). An investigation involving 50 incarcerated individuals revealed their preference for victimising individuals in solitary and dimly lit environments, particularly during nocturnal hours (Dufie et al., 2020). The same study underscored the predilection of these wrongdoers for singling out individuals who lack the means to defend themselves, including females, children, and the elderly (Dufie et al., 2020). In the region of Selangor, the Criminal Investigation Department of the Royal Malaysian Police reported that in the year 2020, a significant 90 percent of the 304 documented cases involved female victims within the age bracket of 14 to 18 (Soh, 2020). Furthermore, data compiled by the Ministry of Women, Family, and Community Development, spanning from January to June 2020, revealed that the police recorded a total of 1,712 instances of sexual offences committed against children, categorised as delineated by Bernama (2020). The data presented above highlights the concern of juvenile delinquency in Malaysia, prompting an examination of the efficacy of existing restorative and punitive strategies in addressing this issue. Consequently, this article seeks to investigate the feasibility of implementing a child curfew in Malaysia, taking into consideration the constitutional framework provided by Article 5(1) concerning the rights to life and liberty.

2. Methodology

This research utilises a doctrinal approach to examine the problem of juvenile delinquency in Malaysia, focusing on the existing juvenile justice system and the application of Article 9 of the Federal Constitution regarding the right to movement. It investigates the weaknesses in Malaysia's legal framework concerning the lack of a child curfew. The methodology involves library-based research, referencing the Federal Constitution, Child Act 2001, and Penal Code, along with judicial interpretations, and published government data on juvenile crimes. Additionally, a comparative analysis is made with the child curfew legislation in the United States.

3. Discussion

Historical Background of Children's Curfew Law

In a general sense, a curfew can be described as a restriction placed on an individual's freedom, compelling them to remain at a designated location for a specific duration (Idriss, 2001). The concept of curfew legislation has historical origins dating back to mediaeval times when it was mandated that fires be extinguished or covered at a designated hour during the night. This practice involved the ringing of a bell to signal the public to adhere to the rule and retire to their dwellings (Harcourt, 2004). The following day, the bell would again ring, signifying that people were permitted to rekindle their fires and leave their homes to resume their daily activities and livelihoods (Whellan, 1859). The original purpose behind curfew laws was to mitigate the risk of accidental public fires (Harcourt, 2004). The term "curfew" itself has its roots in the Old French word "cuevrefu", which translates to "cover the fire" (Frese, 1969). Under the rule of William, the Conqueror, the implementation of curfew laws served a political objective by aiming to prevent nighttime gatherings and conspiracies against the monarchy (Brand & Ellis, 1849). Additionally, curfew laws were enacted to suppress incidents of brawls, sedition, and murders that frequently occurred during the night. Furthermore, these laws were utilised to discourage immoral activities such as prostitution and late-night wandering (Roscoe, 1846). Those found in violation of curfew regulations would face severe penalties enforced by officers authorised to use sticks, including the "penalty of death" (Wideawake, 1835; Thomas, 2016). The law applied to the entire population rather than being limited to juveniles (Hemmens & Bennett, 1999). In Western history, governments introduced curfew ordinances to prevent slaves from being present at public places during specified hours (Scherr, 1992).

Since the nineteenth century, authorities have broadened the application of curfews to serve various purposes, including maintaining peace during emergencies, regulating operating hours of public parks, removing vagrants from the streets, and ensuring public security during times of conflict (Scherr, 1992). The emergence of the industrial revolution saw the powerful elite in society utilising curfew laws to exert control over the lower-class population, specifically labourers and slaves (Rothman, 2015). While the underlying rationale for imposing curfews aimed at preventing social unrest, in another context, curfews were also employed to restrict the movement of marginalised groups (Poon, 2020). With curfews in effect, the working classes found it challenging to assemble in private spaces after their work hours. As for slaves, curfews effectively prevented them from leaving their owners' premises (Coleman & Ganong, 2014). Patrollers were tasked with apprehending slaves caught attempting to escape during curfew hours (Shell, 1987). The implementation of the slave patrol system granted patrollers authority to oversee and regulate all movements and unsupervised activities through methods such as issuing passes, detaining individuals, conducting interrogations, conducting

unrestricted searches and seizures at slave quarters, and even employing legally sanctioned violence for minor violations of slave laws (Muad’ dib, 2019). This implementation of curfews effectively suppressed people of colour who were viewed as subordinate to their White masters (Sasse, 2000).

In the late nineteenth century, the implementation of curfew laws targeted juveniles, a shift prompted by the prohibition of child labour (Diviaio, 2007; Rothman, 2015). As adults took over factory work, often during night hours, children who remained at home without parental supervision began to engage in delinquent activities (Rothman, 2015). The rising rates of juvenile delinquency and victimisation prompted the introduction of curfew legislation as a more stringent measure of social control. During World War II, the children's curfew law proved to be an effective means of control, as most parents were occupied with their contributions to the war effort (US Department of Justice, 1997). With governments calling upon adult males to fulfil their military duties, their female counterparts were left at home to oversee the discipline of their children (Myers & Poutanen, 2005). Unfortunately, in many cases, mothers were also engaged in work outside the home, leading governments to conclude that state intervention was necessary to "educate and regulate" young individuals when parental control was at its weakest. After the war, support for juvenile curfews surged due to a population boom that resulted in a higher number of teenagers and increased delinquency rates (Grossman & Hoke, 2015).

Children’s Curfew Law in the United States

Previous studies in other jurisdictions examined the role and effectiveness of curfew law in curbing juvenile delinquency. The immense support for this law can be attributed to the dual aims of curfew legislation to reduce criminality and victimisation among children by removing them from public places for specific duration (Siegel & Welsh, 2010; Wilson et al., 2016). Additionally, the implementation of curfew laws contributes to enhancing the safety of neighbourhoods and streets (Ruefle & Reynolds, 1996; Adams, 2003). Furthermore, the law also supplements parental supervision by giving additional police control over adolescents’ behaviour in public places during curfew hours (Sutphen & Ford, 2001). In the US, juvenile curfew law is enacted at city’s level. As summarised by Kline (2012), the following cities have enacted child curfew law:

Table 1: Juvenile curfew law in the US

No	City	State	Year of Enactment of Child Curfew Law	Statutory Age for Curfew (years old)
1	Akron	Ohio	1990	17
2	Albuquerque	New Mexico	1994	16
3	Anaheim	California	1990	16
4	Anchorage	Alaska	1989	15
5	Atlanta	Georgia	1991	16
6	Austin	Texas	1992	16
7	Baltimore	Maryland	1995	16
8	Baton Rouge	Louisiana	1995	16
9	Birmingham	Alabama	1996	16
10	Buffalo	New York	1994	16
11	Charlotte	North Carolina	1985	15
12	Cincinnati	Ohio	1994	17
13	Cleveland	Ohio	1993	17
14	Colorado Springs	Colorado	1992	17

15	Corpus Christi	Texas	1991	16
16	Dallas	Texas	1994	16
17	Denver	Colorado	1994	17
18	Detroit	Minnesota	1985	17
19	El Paso	Texas	1992	16
20	Fort Worth	Texas	1994	16
21	Fresno	California	1990	17
22	Garland	Texas	1994	16
23	Glendale	California	1989	17
24	Houston	Texas	1992	17
25	Jackson	Mississippi	1992	17
26	Jacksonville	Florida	1991	17
27	Jersey City	New Jersey	1987	16
28	Kansas City	Montana	1991	17
29	Lexington-Fayette	Kentucky	1995	17
30	Long Beach	California	1988	17
31	Los Angeles	California	1988	17
32	Louisville	Kentucky	1997	17
33	Lubbock	Texas	1994	16
34	Madison	Wisconsin	1992	16
35	Mesa	Arizona	1991	17
36	Miami	Florida	1996	16
37	Mobile	Alabama	2002	17
38	New Orleans	Louisiana	1994	16
39	Newark	New Jersey	1993	17
40	Norfolk	Virginia	1993	17
41	Oklahoma City	Oklahoma	1994	17
42	Phoenix	Arizona	1993	17
43	Richmond	Virginia	1992	17
44	Sacramento	California	1995	17
45	San Antonio	Texas	1991	16
46	San Diego	California	1994	17
47	San Jose	California	1994	17
48	Shreveport	Louisiana	1992	16
49	St. Paul	Minnesota	1990	17
50	Tampa	Florida	1994	16
51	Toledo	Ohio	1993	17
52	Tulsa	Oklahoma	1995	17
53	Virginia Beach	Virginia	1989	17
54	Wichita	Kansas	1992	17

In Detroit, US, a study by Hunter and Weiner (1977) discovered the potential of the children curfew law in reducing crime. Their analysis of offence reports spanning several months revealed that the curfew effectively lowered crime levels during curfew hours. However, they also observed an increase in crimes occurring outside of the curfew hours. In a study of the Dallas curfew law, Bilchik (1996) emphasised the findings from data obtained from the Dallas Police Department, which assessed the effectiveness of the curfew within three months of its implementation. The data showed a significant decrease in juvenile victimisation during the curfew period, dropping from 1,950 to 1,604 (a 17.7 percent reduction) from May 1993 to July

1993. Additionally, arrests of children decreased from 294 to 251 (a 14.6 percent reduction) during curfew hours. The same study also pointed out that in Phoenix, Arizona, there was a 10 percent decrease in violent crimes among teenagers from June 1993 to April 1994 when compared to the period from June 1992 to April 1993, which was before the curfew was implemented. Meanwhile, in Chicago, following the implementation of the curfew, burglaries decreased from 304 in 1993 to 269 in 1994, vehicle thefts decreased from 255 to 177, and thefts decreased from 522 to 177 during the same period.

The study by Bilchik (1996) further exposed a similar trend in New Orleans, where a combination of curfew laws, job programs, and recreational activities was credited with a 27 percent reduction in juvenile crimes in 1994 compared to 1993. Notably, armed robberies saw the most significant decline, dropping by 33 percent, while vehicle thefts decreased by 42 percent. In Denver, police data indicated an 11 percent reduction in serious crimes within the first two years of enforcing the curfew, along with a 7 percent decrease in the recidivism rate. In North Little Rock, the initial full year of curfew implementation in 1992 resulted in a 12 percent reduction in cases of homicide, rape, assault, and robbery, while burglaries decreased by 10 percent. Meanwhile, Kline (2011) conducted a study of curfew implementation in 92 cities across the U.S. from 1980 to 2004 and found that, on average, juvenile arrests decreased by 15 percent in the year the curfew was enforced. Three years after implementation, arrest rates were reduced by 11 percent, and this reduction remained at 11 percent after six years of implementation. Wallace (2020), who investigated the impact of curfew laws in Baltimore from 2014 to 2015, discovered that prior to the curfew's implementation, the average number of all crimes was 760.3, which dropped to 553.3 after the curfew was put into effect. Violent crimes decreased from an average of 147.5 to 106.9, while property crimes decreased from an average of 76.1 to 54.6.

Freedom of Movement of Children

In Malaysia, Article 9 of the Federal Constitution guarantees freedom of movement, allowing any citizen to move freely within the Federation, as well as to leave and return. This fundamental right is closely linked to human autonomy and reflects an individual's choice to pursue a life of their own making, escape poverty and oppression, and chase their personal goals and aspirations (Bruzelius, 2019). The rationale behind Article 9 was enunciated by the late Raja Azlan Shah in *Assa Singh v Menteri Besar, Johor* (1969) 2 MLJ 30 that the Article was designed primarily to emphasise the factual unity of the Federation and to secure the right of the citizen to freely move from one place to another in the Federation or to reside in any part thereof. With the birth of the Federation of Malaysia, all citizens are allowed to move and reside in any part of the Federation which reflects the notion of the Federation as a single unit. Other than that, freedom of movement is also closely linked with the idea of the right to family life. Individuals should be able to live with their family members and maintain relationships with them, regardless of their geographical location. Restricting the freedom of movement can lead to separation of families, which can have a negative impact on the well-being of family members (Lundstrom, 1996).

Although the children's curfew law has been criticised for limiting their right to free movement, it is argued that the law does not completely prohibit this freedom. In fact, similar to practices in the United States, the curfew law includes legitimate exceptions. If children can demonstrate that they meet the criteria for one of these exceptions, they will not be held accountable for violating the curfew. Common exceptions include situations where minors are accompanied by a parent or legal guardian, traveling to or from work, participating in school, religious, or recreational activities, responding to emergencies, or engaging in First Amendment activities

such as protests or political rallies (Office of Justice Programme, 2024). These exceptions aim to balance public safety with the rights and needs of young individuals. In the United States, the constitutionality of children's curfew law was upheld by courts in numerous instances. For instance, in *Bykofsky v. Borough of Middletown* 1242 (M.D. Pa. 1975), the court acknowledged that balancing public safety and individual rights, particularly for minors, is crucial. It balances minors' constitutional rights to freedom of movement with the government's interest in protecting minors and maintaining public order. Exceptions include being accompanied by a parent, exercising First Amendment rights, or having a special permit. In *Qutb v. Strauss* 11 F.3d 488 (5th Cir. 1993), the U.S. Fifth Circuit Court of Appeals upheld a Dallas juvenile curfew law, holding that it did not violate the U.S. or Texas constitutions. The court found that the curfew served a significant government interest in reducing juvenile crime and victimisation. In *Schleifer v. City of Charlottesville* 159 F.3d 843 (4th Cir. 1998), the Fourth Circuit Court of Appeals upheld a juvenile curfew ordinance in Charlottesville, Virginia. The court ruled that the curfew was a reasonable measure to protect minors and reduce juvenile crime, and it included sufficient exceptions to avoid infringing on constitutional rights. Meanwhile, in *Hutchins v. District of Columbia* 188 F.3d 531 (D.C. Cir. 1999) the D.C. Circuit Court of Appeals upheld a juvenile curfew law in Washington, D.C. The court found that the curfew was a valid exercise of the city's police power to protect minors and reduce crime, and it did not violate the constitutional rights of minors.

In employing a similar argument to the Malaysian context, it must be noted that fundamental liberties are not absolute. The complex multiethnic and multi-religious makeup of Malayan society, along with the communist insurgency, required the framers of the Federal Constitution to balance communal interests and demands with state powers over citizens (Fernando & Rajagobal, 2017). As far as freedom of movement is concerned, Article 9(2) of the Constitution lays several grounds to limit the liberty, including security, public order, public health, and the punishment of offenders. In addition to that, Article 149 and 150 on emergency powers and subversive laws can also be invoked to curb freedom of movement (Ikhsan et al., 2022). It is submitted that the children's curfew law is well-covered under the purview of "public order". Public order generally involves preventing disorder and crime, maintaining law and order, and ensuring public peace and safety (Jayawickrama, 2002). The court in *Re Application of Tan Boon Liat @ Allen* [1976] 2 MLJ 83 defined "public order" as "the tranquility and security which every person feels under the protection of law, a breach of which is an invasion of the protection which the law gives. It includes both violent and non-violent acts which would cause danger to human life, safety, and public tranquility." The court ultimately held that drug trafficking is an activity that strikes the very core of public order. Similarly, children's curfew law aims to ensure public order and safety, by removing potential juvenile offenders or victims of night crimes, from the streets. This limits the opportunity of children getting engaged with criminal behaviours and consequently, facilitates crime control activities and maintenance of peace by police officers. The government plays an essential role to protect children and ensure their well being, based on *parens patriae* doctrine (Wilkinson-Hagen, 2004).

4. Conclusion

As of the current moment in Malaysia, there is a notable absence of curfew legislation specifically targeting the child population, both at the Federal and State levels. Despite the federal government's expression of interest in implementing a curfew law for children in 2019, no specific legislation or amendments to the Child Act 2001 (Act 611) have been enacted to incorporate curfew provisions. It is noteworthy that although the states of Kelantan and Perlis

had initially declared their intentions to introduce curfew laws, these plans were ultimately abandoned due to public disapproval and opposition from the federal government.

In response to the escalating concern surrounding juvenile delinquency and recognizing the limitations of punitive justice approaches in effectively reducing delinquency rates, this study advocates for the exploration of curfew laws as a potential mechanism to manage juvenile delinquency and victimisation. Recent reports on incidents of juvenile crimes suggest that existing punitive measures aimed at children who are deemed beyond control and in conflict with the law have proven insufficient in curbing juvenile delinquency rates. A re-evaluation of preventive measures, specifically those designed to minimise contact between children and criminal elements, as well as opportunities for criminal involvement through the implementation of curfew laws, may contribute to a reduction in criminal activities and victimisation among children. Drawing inspiration from the experience in the United States, where curfew laws have proven effective in enabling law enforcement agencies to reduce cases of juvenile delinquency and victimisation, there is a potential for positive impact.

Recognising that children represent the future of the nation, early intervention to prevent their engagement in disorderly and criminal behaviour is crucial in shaping a dignified and promising future. In the context of Article 9 of the Constitution, which provides for the protection of freedom of movement, it should be interpreted that reasonable restrictions can be implemented to ensure the safety and well-being of children. As *parens patriae*, the government shares the responsibility of caring for children, in addition to the parental role of guardians and the family institution.

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References

- Ahmad Badayai, A. R., Khairudin, R., Ismail, K. & Wan Sulaiman, W. S. (2016). An Exploratory Study on Symptoms of Problem Behaviours among Juvenile Offenders. *Jurnal Psikologi Malaysia*, 30(1), 69-79.
- Arshad, M. R. M., Omar, M. & Shahdan, N. (2015). Alcoholism among Youth: A Case Study in Kuala Lumpur, Malaysia. *International Journal of Culture and History*, 1, 21-28.
- Adams, K. (2003). The Effectiveness of Juvenile Curfews at Crime Prevention. *The Annals of the American Academy of Political and Social Science*, 587(1), 136–159. <https://doi.org/10.1177/0002716202250944>
- Bates, K. A., & Swan, R. S. (2020). *Juvenile Delinquency in a Diverse Society*. Sage Publications.
- Bernamea (18 August 2020) 1,721 kes jenayah seksual kanak-kanak. *Harian Metro*. Retrieved from <https://www.hmetro.com.my/mutakhir/2020/08/611494/1721-kes-jenayah-seksual-kanak-kanak>
- Bilchik, S. (1996). Curfew: An Answer to Juvenile Delinquency and Victimization? *Juvenile Justice Bulletin*, 1-11.
- Brand, J. & Ellis, H. (1849). *Observations on the Popular Antiquities of Great Britain: Chiefly Illustrating the Origin of Our Vulgar and Provincial Customs, Ceremonies, and Superstitions, Volume 2*. London: Henry G. Bohn.
- Bruzelius, C. (2019). Freedom of movement, social rights and residence-based conditionality in the European Union. *Journal of European Social Policy*, 29(1), 70–83
- Coleman, M. J. & Ganong, L. H. (2014). *The Social History of the American Family: An Encyclopedia*. Sage.

- Department of Statistics, Malaysia. (2022). Children's Statistics, Malaysia. 2022. Putrajaya: Department of Statistics, Malaysia.
- Dermawan, A. (2017 June 19). Four teenagers charged with the murder of Nhaveen. NST. <https://www.nst.com.my/news/crime-courts/2017/06/250459/four-teenagers-charged-murder-nhaveen>
- Diviaio, D. (2007). The government is establishing your child's curfew. *Journal of Civil Rights and Economic Development*, 21(3), 798-835.
- Dufie, A. F., Nachinaab, J. O., Krampah, S., & Ayim, P. N. (2020). Determinants of Target Victim Selection: A Case Study of Criminals from Gambaga Prisons. *Journal of Victimology and Victim Justice*, 3(1), 93-112.
- Economic Planning Unit, Prime Minister's Department. (2013). Implementation of children's rights with equity. Economic Planning Unit.
- Federle, K. H. (1995). Children, Curfews, and the Constitution. *Washington University Law Quarterly*, 73(3), 1315-1368.
- Fernando, J. M. & Rajagopal, S. (2017). Fundamental liberties in the Malayan constitution and the search for a balance, 1956-1957. *International Journal of Asia Pacific Studies* 13 (1), 1-28.
- Field, B. C. (2019). *The Evolution of the Juvenile Court: Race, Politics, and the Criminalizing of Juvenile Justice*. NYU Press.
- Flores, J. R. (2003). Child delinquency. *Bulletin Series*, May 2023. Retrieved from <https://www.ojp.gov/pdffiles1/ojdp/186162.pdf>
- Frese, G. C. (1969). The Riot Curfew. *California Law Review*, 57(2), 450-489. <https://doi.org/10.2307/3479513>
- Grossman, E. & Hoke, K. S. (2015). Guidelines for Avoiding Pitfalls When Drafting Juvenile Curfew Laws: A Legal Analysis. *St. Louis University Journal of Health Law and Policy*, 8, 301-346.
- Harcourt, M. F. (2004). *Word Histories and Mysteries: From Abracadabra to Zeus*. Boston.
- Harding, F. M., Hingson R. W., Klitzner, M., Mosher, J. F., Brown, J., Vincent, R. M., Dahl, E. & Cannon, C. L. (2016). Underage Drinking: A Review of Trends and Prevention Strategies. *Am J Prev Med.*, 51(4), 148-157.
- Hemmens, C., & Bennett, K. (1999). Juvenile curfew and the courts: Judicial response to a not so-new crime control strategy. *Crime & Delinquency*, 45, 99-121.
- Herring, J. (2023). Vulnerability and Children's Rights. *International Journal for the Semiotics of Law*, 36, 1509-1527.
- Hunter, A. L. & Weiner, K. (1977). Impact of a juvenile curfew - suppression and displacement in patterns of juvenile offences. *Journal of Police Science and Administration*, 5(4), 407-412.
- Hussin, N. (2007). Juvenile Delinquency in Malaysia: Legal Framework and Prospects for Reforms. *IIUM Law Journal*, 15(2), 197-214.
- Idriss, M. M. (2001). 2001) The power to impose curfew orders. *Criminal Law and Justice Weekly*, January 4, 58.
- Ikhsan, M. I., Kamaruddin, S., & Ku Yusof, K. M. A. A. (2022). Mobility and Movement Rights in Malaysia: The Constitutional Ultimatum. *Borneo Akademika*, 6(1), 25-31.
- Jayawickrama, N. (2002). *The judicial application of human rights law: National, regional and international jurisprudence*. Cambridge University Press.
- Karim, K. N. (2020, August 17). 2017 Tahfiz fire: Teen found guilty of murdering 23 people. *New Straits Times*. Retrieved from <https://www.nst.com.my/news/crime-courts/2020/08/617233/2017-tahfiz-fire-teen-found-guilty-murdering-23-people-nsttv>

- Kassim A.W. (2006). Juveniles on Remand: Trends and Practices in Malaysia. Resource Material Series/United Nations Asia and Far East Institute for the Prevention of Crime and the Treatment of Offenders, 68, 196–208.
- Kline, P. (2011). The impact of juvenile curfew laws on arrests of youth and adults. *American Law and Economics Review*, 14, 44–67.
- Lewit, E. M. & Baker, L. S. (1996). Children as Victims of Violence. *The Future of Children*, 6(3), 147–156.
- Loeber, R., Farrington, D. P. & Petechuk, D. (2003). Young Offenders and an Effective Response in the Juvenile and Adult Justice Systems: What Happens, What Should Happen, and What We Need to Know (Study Group on the Transitions between Juvenile Delinquency and Adult Crime). US Dept of Justice.
- Lundstrom, K. (1996). Family Life and the Freedom of Movement of Workers in the European Union. *International Journal of Law, Policy and the Family*, 10(3), 250–280.
- Mallow, M. S. (2015, February 2-4). Juvenile Delinquency in Malaysia: Current Issues and Promising Approaches. Paper presented at the 2nd International Conference on Education and Social Sciences, Istanbul.
- Ministry of Women, Family, and Community Development. (2016 – 2020). Children Statistics. Putrajaya: Ministry of Women, Family, and Community Development.
- Muad'dib, M. E. (2019). Slave Patrols and the Origin of the Police in America. Lulu.com
- Myers, T. & Poutanen, M. A. (2005). Cadets, Curfews, and Compulsory Schooling: Mobilizing Anglophone Children in WWII Quebec. *Social History*, 38(76), 367-398.
- Ng, C. (2003, July 2). Boy convicted of murdering tuition teacher's daughter. *The Star*. <https://www.thestar.com.my/news/nation/2003/07/02/boy-convicted-of-murdering-tuition-teachers-daughter>
- Norozi, S., & Moen, T. (2016). Childhood as Social Construction. *Journal of Educational and Social Research*, 6, 75–81.
- Office of Justice Programme, US. (2024). Youth curfews. <https://ojjdp.ojp.gov/model-programs-guide/literature-reviews/youth-curfews>
- Othman, A. F. (18 February 2017) Nine children dead as car rams into cyclists in Johor Bahru. *New Straits Times*. <https://www.nst.com.my/news/2017/02/213356/nine-children-dead-car-rams-cyclists-johor-baru>
- Poon, L. (2020, June 18). The Racist History of Curfews in America. <https://www.bloomberg.com/news/articles/2020-06-18/the-racist-history-of-curfews-in-america>
- Ramendran, C. (2019, December 13). Crimes that shook the nation: Tragic end to car chase for 15-year-old. *The Sun Daily*. <https://www.thesundaily.my/local/crimes-that-shook-the-nation-tragic-end-to-car-chase-for-15-year-old-YJ1759717>
- Rawls, J. (1971). *A Theory of Justice*. Harvard University Press.
- Roscoe, T. (1846). *The Life of William the Conqueror: Now First Published from Official Records and Other Authentic Documents*. Philadelphia: Lea & Blanchard.
- Rothman, L. (2015 April 29). How Curfews Have Changed Through History. Retrieved from <https://time.com/3839427/emergency-curfew-history-juvenile/>
- Ruefle, W. & Reynolds, K. M. (1996). Keep Them at Home: Juvenile Curfew Ordinances in 200 American Cities. *American Journal of Police*, 15(1), 63-84.
- Sasse, B. C. (2000). Curfew Laws, Freedom of Movement, and the Rights of Juveniles. *Case Western Reserve Law Review*, 50, 681-728.
- Scherr, P. L. (1992). The Juvenile Curfew Ordinance: In Search of a New Standard of Review. *Washington University Journal of Urban and Contemporary Law*, 41, 163-192.
- Shell, R. C-H. (1987). *Slavery at the Cape of Good Hope, 1680 to 1731, Volumes 1-2*. Yale University.

- Siegel, L. J. & Welsh, B. C. (2010). *Juvenile Delinquency: The Core*: Cengage Learning.
- Soh, R. C. (29 December 2020) 90 peratus mangsa rogol gadis bawah umur. *Sinar Harian*. Retrieved from <https://www.sinarharian.com.my/article/116652/LAPORAN-KHAS/90-peratus-mangsa-rogol-gadis-bawah-umur>
- Sutphen, R. D. & Ford, J. (2001). The Effectiveness and Enforcement of a Teen Curfew Law. *The Journal of Sociology & Social Welfare*, 28(1), 55-78.
- Tai, S. S., Abu Bakar, S. H. & Islam, M. R. (2019). Poverty and Delinquency: A Qualitative Study on Selected Juvenile Offenders in Malaysia. *International Social Work*, 62(2), 965–979.
- Thomas, M. (2016). *Missing the Curfew: A Cultural History Case for Re-Reading Thomas Gray's Most Famous Line*. Master thesis, University of Vermont.
- Townsend, J. D. (1896). Curfew for City Children. *The North American Review*, 163(481), 725-730.
- US Department of Justice. (1997). *Juvenile Justice Reform Initiatives in the States: 1994 – 1996*.
- Wallace, L. N. (2020). Baltimore's Juvenile Curfew: Evaluating Effectiveness. *Criminal Justice Review*, 45(2), 171–184. <https://doi.org/10.1177/0734016815626971>
- Weinberger, A. H., Platt, J., Esan, H., Galea, S., Erlich, D., & Goodwin, R. D. (2017). Cigarette Smoking Is Associated with Increased Risk of Substance Use Disorder Relapse: A Nationally Representative, Prospective Longitudinal Investigation. *J Clin Psychiatry*, 78(2), e152-e160.
- Whellan, T. (1859). *History and topography of the city of York; and the North riding of Yorkshire*, Volume 2.
- Wideawake, W. (1835). *King versus people, crusade the first, as developed in certain insidious provisions of the Municipal corporations' bill*. Miami: HardPress.
- Wilkinson-Hagen, A. (2004). The Adoption and Safe Families Act of 1997: A collision of *Parens Patriae* and parents' constitutional rights. *Geo. J. on Poverty L. & Pol'y*, 11, 137.
- Williams A. F. & Ferguson, S. A. (2002). Rationale for graduated licensing and the risks it should address. *Inj Prev*, 8(Supp II), 9 – 16.
- Wilson, D. B., Gill, C., Olaghere, A., & McClure, D. (2016). Juvenile Curfew Effects on Criminal Behavior and Victimization: A Systematic Review. *Campbell Systematic Reviews*, 12(1), 1-97.
- Zakaria, E., Kamarudin, N. N., Mohamad, Z. S., Suzuki, M., Rathakrishnan, B., Bikar Singh, S. S., Rahman, Z. A., Sabramani, V., Shaari, A. H., & Kamaluddin, M. R. (2022). The role of family life and the influence of peer pressure on delinquency: Qualitative evidence from Malaysia. *International Journal of Environmental Research and Public Health*, 19(13), 7846, doi: 10.3390/ijerph19137846. PMID: 35805504
- Zhang, Y., Davies, A., & ChengXiang, Z. (2024). Understanding the Social Construction of Juvenile Delinquency: Insights from Semantic Analysis of Big-data Historical Newspaper Collections. *Journal of Computational Social Science*, 7, 1095–1137.