**NICRO SUBMISSION:** to the *PORTFOLIO COMMITTEE ON JUSTICE AND CORRECTIONAL SERVICES, 20 SEPTEMBER 2016.*

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**THE ADMINISTRATION OF CORRECTIONAL SUPERVISION AND PAROLE, SUCCESSES, CHALLENGES AND FUTURE DEVELOPMENTS.**

**Introduction**

*We are still a long way from the time when our conscience can be certain of having done everything possible to prevent crime and control it effectively, so that it no longer does harm and, at the same time, to offer those who commit crime a way of redeeming themselves and making a positive return to society. If all those in some way involved in the problem tried to..develop this line of thought, perhaps humanity as a whole could take a great step forward in creating a more serene and peaceful society.* **Pope John Paul II, July 9, 2000**

1. NICRO thanks the Portfolio Committee, for this opportunity and its commitment to celebrate the successes of the correctional supervision and the management of offenders on parole system, and strengthen efforts. Effectiveness is fundamental to the integrity of the system.
2. Our response to crime in South Africa is a challenge and a moral test for us as a nation. Crime and violence is still rampant in our communities. More tragically, we are burying young people/children caught in gang violence, the drug trade, and because of crime. As a nation we still struggle to respond to the needs of victims. Further we know the causes of crime are complex, and the ways to overcome violence are not simple. We see firsthand the shame of poverty, the trauma of abuse, crime and violence, and breakdown of family life that often leads to crime. Also affected by crime are children left behind by incarcerated parents –children who are themselves at risk for criminal activity.
3. Sadly putting more people in prison has not made our society any less violent or secure. We spend over R20 billion on corrections in SA-that says a lot about efforts to prevent crime in South Africa. What comparatively do we spend on Health, Education, and Social Development for instance?
4. The White Paper on Correctional Services in 1998 introduced the notion of a transformed correctional system where rehabilitation and correction of offenders is at the centre. This was a decision based on the view of a long term crime prevention strategy through the reduction of repeat offending through the provision of effective rehabilitation services.
5. Yet, the paradigm shift to rehabilitation and human rights has not permeated to all officials and society at large. We remain a society that is still very punitive in its thinking for punishment as the call for justice. What would it take for us to create a Restorative System of Justice?
6. My submission highlights a discussion on some of the Challenges with the Legal Framework for the Administration of Parole in South Africa; Other Challenges That Impact The Administration Of Correctional Supervision And Parole, Include Challenges With Monitoring Parolees And Those Under Correctional Supervision; Challenges Regarding VOD At Parole Stage, Challenges With Offender Reintegration; Successes; Future Developments; And Some Key Recommendations.

**A discussion on some of the challenges with the Legal Framework for Parole in South Africa**

1. Section 73(1) of the Correctional Services Act[[1]](#footnote-1) states that -(a) a sentenced prisoner remains in prison for the full period of sentence; and (b) a prisoner sentenced to life imprisonment remains in prison for the rest of his or her life.” The provisions clearly stipulate that a prison sentence must be served in full, although there are circumstances under which a inmate can be released on parole;
2. Parole has various motivations which include being an alternative to imprisonment, rewarding offenders for complying with their sentence plan and participating in rehabilitation programmes, and combating recidivism by ensuring the gradual re-integration of offenders.[[2]](#footnote-2)
3. Under Section 75(1) of the Correctional Services Act, the Correctional Supervision and Parole Board (CSPB) is empowered, after considering the report on a prisoner submitted to it by the Case Management Committee, to place on parole any prisoner serving a determinate sentence exceeding 12 months. In respect of dangerous criminal and prisoners serving life sentences, the CSPB is empowered to make a recommendation to the court for their placement on parole.[[3]](#footnote-3)In terms of section 77(1), the Correctional Supervision and Parole Board is empowered to review the decision of the CSPB should be a submission be made to it by the Minister of Correctional Services, the Commissioner of Correctional Services, the Inspecting Judge[[4]](#footnote-4), or the “person concerned” Under section (75)(7)(a) of the Correctional Services Act, the Commissioner of Correctional Services is empowered to place on parole a sentenced offender serving a sentence of incarceration of 24 months or less.
4. Section 73(6)(a) of the Correctional Services Act provides that, a prisoner serving a determinate sentence may not be placed on parole until such a prisoner has served either the stipulated non-parole period, or if no non-parole period was stipulated, half of the sentence, but parole must be considered whenever a prisoner has served 25 years of a sentence of cumulative sentences;
5. The 1959 Correctional Services Act, allowed prisoners to serve just more than one-third of their sentences;
6. Under section 73(6), an offender sentenced un terms of the Criminal Law Amendment Act[[5]](#footnote-5), which provides for minimum sentence for stipulated offences, ‘may not be placed on parole unless he or she has served at least four fifths of the term of imprisonment imposed or 25 years, whichever us the shorter, but, the court, when imposing imprisonment, may order that the prisoner be considered for placement on parole after he or she has served two thirds of such a term.
7. Section 276B (1) of the Criminal Procedure Act empowers the court to impose a non-parole period. It stipulates: (a) if a court sentences a person convicted of an offence to imprisonment for a period of two years or longer, the court may as part of the sentence, fix a period during which the person shall not be placed on parole; (b) such period shall be referred to as the non-parole-period, and may not exceed two thirds of the term of imprisonment imposed or 25 years, whichever is the shorter.
8. However, although the release on parole is not a right, the offender has a legitimate expectation that he/she will be considered for parole, and will be placed on parole should he fulfil all of the requirements, for example, that he has served the non-parole period and has been rehabilitated. In cases where the offenders meets all of the requirements for placement on parole and is not placed on parole, courts may intervene and order that he be placed on parole;
9. Although the Correctional Services Act provides for the circumstances in which a prisoner qualifies to be released on parole, prisoners have on several occasions litigated against the DCS and CSPB’s asking courts to order the CSPB’S, among other things to rely on the right law in reaching parole decisions, exercising their parole powers in line with the law, and in some circumstances placing offenders on parole[[6]](#footnote-6). Mduzi (2011)[[7]](#footnote-7), stated that in this growing confusion there has been an increase in the number of parole-related judgements emanating from the South African courts. He argued that this indicates that there appears to be a general view held by many prisoners that parole proceedings are unfair to them[[8]](#footnote-8). This is confirmed in the number of complaints regarding parole in the respective Annual Reports of the JICS, where parole complaints have been some of the majority[[9]](#footnote-9)
10. According to Mduzi (2011:222), courts are willing to scrutinize CSPB decisions to ensure that prisoners who qualify to be placed on parole are not prejudiced by the CSPB’s misunderstanding of the law relating to the parole of prisoners.
11. On 23 April 1998 DCS issued a circulated to all prisons a policy document which intended, among other things, to bring about uniformity in relation to parole procedures and decisions, which led to some confusion for some prisoners. The court issues a ruling[[10]](#footnote-10) in that whenever the DCS revises its guidelines relating to parole, caution must be exercised to ensure that prisoners who are serving sentences at the time the new laws or guidelines come into force are not adversely affected, that is to say, do not end up serving longer (than that was initially intended) prison terms before being considered for parole. Therefore the laws on parole in place at the time of sentencing are the one that applies to a particular prisoner[[11]](#footnote-11).
12. With regard to parole, as well as medical parole, the court makes it clear that DCS and the CSPB can determine whether or not a prisoner should be placed on parole, but that that power must be exercised in accordance with the law[[12]](#footnote-12).
13. According to Mduzi (2011:219), the law relating to parole has changed several times in South Africa with the result that many prisoners, correctional officials and parole board members have understandably found it difficult to establish which specific governs specific prisoners[[13]](#footnote-13).
14. Mduzi (2011:223) argues that confusion reigns because of the various amendments to the Correctional services Act regulated parole, the various polices and/or regulations adopted by the DCS to regulate the release of prisoners on parole, and the different understanding that different courts have had in relation to the length of sentence an offender should serve before being considered for parole.

**CHALLENGES THAT IMPACT THE CORRECTIONAL SUPERVISON AND PAROLE SYSTEM**

1. The Department ahead of time foresaw the challenges of over-crowding; Institutionalised prison culture and corruption; Training for the new paradigm and structuring for the new paradigm[[14]](#footnote-14).
2. Overcrowding continues to be a challenge in the majority of larger Correctional centres around the country. We cannot underestimate the impact of overcrowding on the effectiveness of the correctional system and in turn on the effective rehabilitation and reintegration of the offender.
3. The White Paper on Correctional Services identified the causes of overcrowding to include inefficient functioning of the criminal justice system; the high incarceration rate when compared to other countries; the introduction of minimum sentences for particular categories of serious crime in 1997, resulting in an increase in the proportion of long term offenders; crime trends in South Africa, particularly relating to violent crimes and serious economic offences; levels of awaiting trial offenders in correctional centres; inadequate needs driven facility planning in the Integrated Justice system;
4. NICRO was also involved in the development of an electronic monitoring system, called “REMAND REVOLUTION”, that would allow for the release and monitoring of more inmates on remand detention. NICRO’s model includes the provision of interventions and services, and links to those services via cell phone technology. We have pitched this proposal to the DCS, but we were informed that they are planning to extend their own system of electronic monitoring to remand detainees. NICRO continues to lobby that REMAND Detention system continue to receive attention, as there are far too many people (approx. 50,000) awaiting trial for lengthy periods. This is a serious human rights issue that needs urgent attention.

*Challenges in monitoring parolee’s and those on correctional supervision*

1. Stringent Parole and correctional supervision monitoring rules, seek to cause much frustration and hopelessness among inmates. We are aware that the inmate is still a possible risk and it is a privilege to be on parole, but it appears sometimes that deliberate efforts are made to frustrate parolee’s rather than create an empowering environment that allows them to succeed. There also appears to be an abuse of power in far too many instances that needs to be carefully monitored. Parolees, NICRO has encountered have also complained that they are treated like less, or disrespected. Treating a person with dignity and respect, despite his transgressions, has been in my 21 year experience of working with people in prison, ex-offenders and those in conflict with the law, allowed for better outcomes in respect of rehabilitation.

*Challenges regarding VOD at Parole*

1. NICRO’s experience has been that the current practice of contacting and involving of victims needs to be reviewed.
2. The current practice includes inmates trying to trace victims and contacting them directly, or the CSPB’s contact victims themselves, or the DCS social workers or outside agencies. Clear roles and responsibilities need to be worked out. For instance to what extent should the CSPB’s be involved with victims? What are the role of the victim support and counselling agencies?
3. VOD’s are given priority in terms of addressing victim’s rights and needs, however NICRO had been involved in instances where victims were not given the opportunity to submit victim impact statements or make any other submissions before the CSPB’s. This has resulted in victim dissatisfaction.
4. NICRO would like to strongly recommend that VOD’s and preparation for such needs to be done at the front end when inmate first sentenced, and not at the back-end when they about to be released. This is an unfair system for both the victim and the offender. Victims are also found having not to have received counselling etc. NICRO would suggest that a victim notification system and victim office needs to be established at a court level.
5. Victims will feel more confident about transparency if their views were more carefully considered and relevant timely notices about offences and parole are given to them. However more needs to be done to improve the standards related to such practice.
6. Recently we have also been concerned about children under 18 being involved in VOD processes, some very complex matters such as incest issues have also come to the fore. Stringent measures must be adopted for children. NICRO recommends a Child Protocol for victims involved in VOD cases.

*Challenges regarding the reintegration of offenders*

1. Ex-offenders do need support if they are to effectively reintegrate into society.
2. Presently we do not as a country have a Comprehensive Offender Reintegration strategy. Services are fragmented and uncoordinated and it is pure luck or by divine intervention that ex-offenders are able to access what they need to succeed. There are also an insufficient number of halfway houses, family mediation/therapy support, and trauma support.
3. One of the most significant challenges ex-offenders face is employment policies that discriminate on the basis of a criminal record. Ex-offenders in many instances are not given even a chance to prove themselves. I personally meet with ex-inmates that become so demoralized and hopeless as a result of not being able to provide for their families and for themselves, and in not being given a chance to reintegrate and make a more positive contribution to society.
4. Often we find families, and communities and many levels of our society are not sympathetic to the plight of the ex-offender who is committed to turn their lives around. Even some Community Corrections officers are found not to be sympathetic to ex-offenders who are doing incredible voluntary work in their communities-they still have to struggle under stringent conditions in asking for permission to even do the incredible good they are involved in. Permission has to be asked for everything, and sometimes permissions are not granted or granted at the last moment- in many instances it is apparent that it is an abuse of power. We understand that ex-inmates must be monitored with due diligence, but this should not be done in a way that is more likely to break the individual than build them up. Many ex-inmates have said to me, “I feel like a lesser person, an animal, and an outcaste.”

**SUCESSES we can celebrate!**

1. SA must be commended on laws that incorporating alternatives such as diversion and non-custodial sentencing measures such as correctional supervision and parole, as well as an increasing focus on incorporating restorative Justice Interventions into practice. The recent introduction of electronic monitoring also developed another intervention for the monitoring of parolee’s.
2. NICRO is aware that increasing attention has been given to the needs and rights of victims in recent years, by the CSPB’s and the DCS overall, and these efforts must be noted and accepted;
3. NICRO would like to also commend the DCS for all of its efforts to support VOD processes. Practice has definitely improved in recent years, but more needs to be done to improve standards. The Cape Town Community Corrections office, under the leadership of Mr Fielies, recently established a VOD forum to discuss cases, and have invited external stakeholders such as NICRO to participate. This has been very progressive in increasing knowledge and improving standards for VOD’s, and stands out as a good practice.
4. We should also give honour to all those who give are engaged and involved in preventing crime and rebuilding lives and communities;

**CONCLUDING REMARKS AND FUTURE DEVELOPMENTS**

1. We need to institutionalise a Respect for Human Dignity within the Correctional services system. We need to hold offenders accountable, and challenge and support them to change their lives, but in a way that respects their dignity. James Garbarino, a well-known psychologist and author, from the US, stated in a seminar he held with us (present were -DCS staff, NGO’s, Legal profession, religious organizations, ordinary citizens) in South Africa, that we need to develop “a respect economy in prisons.” It is the intervention most likely to facilitate rehabilitation and prevent recidivism.[[15]](#footnote-15)
2. In South Africa, there is still a need for political, economic and social justice. For us as a country we need to ask ourselves –How can we restore respect for the law and life? How can we protect and rebuild communities, confront crime without vengeance, and defend life without taking life? These questions should challenge us and direct future developments. The dignity of the human person applies to both victims and offenders.
3. The current trend of the over use of incarceration[[16]](#footnote-16) must be reviewed, as well as monitoring if the courts and the DCS are adequately making use of alternatives. We may need to amend legislative provisions to make imprisonment an option of last resort for all.
4. A directory of community-based rehabilitation interventions needs to be developed, and we must include the need for more interventions such as drug rehabilitation centres/intervention is not leaving our communities safer.
5. We must develop a trauma-informed lens if we are to restore and heal the soul of our nation.
6. We should be seriously dialoguing about the costs of incarceration versus less costly alternatives such as prevention, education, community efforts, and drug treatment.
7. A sense of community needs to be restored, and we need to resist and heal the violence that has engulfed so much of our society for centuries. "Community" is not only a place to live; the word also describes the web of relationships and resources that bring us together and help us cope with our everyday challenges.
8. One of the criticisms of rehabilitation efforts is –are we using programmes that work and to what extent? NICRO has put before the previous PC on Correctional services the need to request of the DCS research and evaluation studies that show the impact of their interventions, and whether best practice principles for rehabilitation are being applied. Further no single treatment or intervention works for every offender-rather it depends on the type of offence, whether the offender is high, medium or low risk, quality of programme, the therapist or programme provider, family, community support, as well as the ability to establish a Continuum of Through-care from prison to community upon release. Recent nation-wide studies in the US[[17]](#footnote-17) have shown that drug treatment is reducing drug use, criminal activity, and physical and mental health problems, as well as increasing employment potential. These research studies suggest that drug treatment is a very cost-effective method to reduce substance abuse and crime. The savings to tax payers from quality substance abuse treatment programmes versus imprisonment is significant[[18]](#footnote-18). Community policing and neighbourhood-watch groups have proven to be effective models of crime control and community building, empowering local leaders to solve their own problems.
9. St. Thomas Aquinas taught us that punishment of wrongdoers is clearly justified, but is never justified for its own sake. A compassionate community and a loving God seek accountability and correction but not suffering for its own sake. Punishment must have a constructive and redemptive purpose.[[19]](#footnote-19)
10. NICRO work is underpinned by the principles of Restorative Justice. In saying this we believe that Restorative Justice is not just programmes, but a lens through which we can look at crime. NICRO supports a justice system that rehabilitates and restores rather than punishes. More needs to be done to utilize more fully the principles and restorative justice interventions to manage offenders, hold them accountable, to heal and restore. These are one of the key interventions, together with a greater focus on socio-economic factors such as addressing poverty reduction and inequality, discrimination and racism, unresolved trauma and victimization, unemployment, and family and community rebuilding, and in building community participation and cohesion, and in building a human rights culture, that is likely to turn crime and violence in South Africa around.
11. We cannot ignore these root causes if we are to move forward. Hence we also need a developmental approach to crime prevention. Where families are broken we need to step in as a community and offer love and mentorship and compassion.
12. For centuries we have focused on curing the symptoms of the problems that face us, yet justice activity today must deal with the unjust systems that are the source of the symptoms of poverty, homelessness, the crime and violence, substance addiction, and environmental threats that continue to plague our country and the world;
13. We need to be vigilant of unjust systems and abuse of power.

**RECOMMENDATIONS TO IMPROVE THE EFFICIENCY OF THE CORRECTIONAL SUPERVISION AND PAROLE SYSTEM**

1. In order to alleviate the overcrowding dilemma, and the negative effects of incarceration, increased alternatives must be continued to be sort, which implies a strengthening and further capacitating of the Correctional Supervision and Parole system;
2. The CMC’s and the CSPB’s must impose upon itself an imperative of consideration of each potential parolee’s case well before the dates of expiration of parole. One has to be cognisant as well of the load of the huge number of cases. The PC should also review various judgements to enquire if the issue of misunderstanding of the law related to parole is still happening;
3. Mduzi (2011)[[20]](#footnote-20) recommends that the confusion can be minimised by simplifying the law related to the release of offenders on parole so that prisoners, members of the Case Management Committees (CMC’s) and parole boards who are not well conversant with the law understand it and apply it consistently. He further recommended that parole manuals be developed and made widely accessible to prisoners so that they can calculate or be helped by their colleagues or prison authorities to determine the exact date on which they are eligible to be considered for parole, and what is expected of them to enhance their prospects of being released on parole. This will possibly reduce the number of prisoners who resort to courts for orders to force DCS to consider them or released them on parole. This will also prevent a last minute dash to complete programmes and VOD’s once appearing for the first time before the parole board, which is what seems to be happening, in instances of cases NICRO has had to intervene in.
4. A comprehensive, efficient, electronic database and case management system is required;
5. If inmates are made aware of when they are likely to be considered for parole, and what the relevant requirements are, then the onus must also be placed on the inmate to attend the necessary programmes etc. It could turn the mind of the inmate onto their rehabilitation and keep them focused while in prison, as well as the dignity afforded of knowing there is a possible end in sight.
6. Victims voices need to be heard and their views considered before any prisoners are released on parole. A separate Victim’s office should be set up to give victim’s timely notice of an offender’s sentence, the possibility of an offender’s parole, and any likely conditions of it in order to enable victims to make submissions and such arrangement as they wish to make if parole was granted. Victims should be timeously informed of an offender’s release. Perhaps guidelines/regulations can be developed for the latter.
7. Regarding Correctional supervision/parole officers, incentives should be put in place to attract and retain efficient and mature staff to do the important and difficult work of supervision in the field. We are aware of the high numbers of inmates on parole, but the ratio of offenders to parole officers must be minimised if one is to see positive outcomes. Managers should be able to oversee, train and mentor staff working in the field. The DCS White Paper says that every DCS official is a “rehabilitator.” These officials face the enormous task of motivating and encouraging the inmate released on parole or on correctional supervision. More effort needs to be put into training and paradigm shifts so that these officials are equipped to ensure the best chances for inmates on correctional supervision and parole to succeed in their rehabilitation. Self-care for these officials is also paramount so that they do not become weary and burn out.
8. There should be regular seminars for continuing education for CSPB’s, to raise the standards and knowledge of its members, and to promote consistency in the making of decisions. The CSPB’s should avail itself of the expertise external to it in the fields of criminology, psychiatry and related disciplines.
9. Guidelines must be put in place to ensure victims are handled correctly, and not re-victimized.

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Responsibility, rehabilitation, and restoration: A Catholic Perspective on crime and criminal justice-A Statement of the Catholic Bishops of the United States, Issued by USCCB, November 15, 2000. United States Conference of Catholic Bishops, Inc. All rights reserved. [file:///C:/Users/Public/Documents/Personal/J&P/ST%20MICHAELS/Responsibility,%20Rehabilitation,%20and%20Restoration%20A%20Catholic%20Perspective%20on%20Crime%20and%20Criminal%20Justice.htm](file:///C%3A/Users/Public/Documents/Personal/J%26P/ST%20MICHAELS/Responsibility%2C%20Rehabilitation%2C%20and%20Restoration%20A%20Catholic%20Perspective%20on%20Crime%20and%20Criminal%20Justice.htm)

1. Correctional Services Act, 111 of 1998 [↑](#footnote-ref-1)
2. Mduzi, J.D (2011:206), “ Unpacking the Law and Practice relating to Parole in South Africa,” P.E.R Journal, Volume 14, No 5 [↑](#footnote-ref-2)
3. Section 75(1) (b) and (c) of the Correctional Services Act. Section 78 governs the release of offenders serving life imprisonment. [↑](#footnote-ref-3)
4. See Section 75(8), as amended by the Correctional Services Act 25 of 2008 [↑](#footnote-ref-4)
5. Criminal Law Act, 105 of 1997 [↑](#footnote-ref-5)
6. Mduzi, J.D (2011:206), “ Unpacking the Law and Practice relating to Parole in South Africa,” P.E.R Journal, Volume 14, No 5 [↑](#footnote-ref-6)
7. Mduzi, J.D (2011:206), “ Unpacking the Law and Practice relating to Parole in South Africa,” P.E.R Journal, Volume 14, No 5 [↑](#footnote-ref-7)
8. In Mduzi, J,D (2011:221), The June 2008 Transvaal Provincial Division High Court decision of Lombard v Minister of Correctional services and Others and Two Similar cases 2009(1) SACR 157(T), showed how courts are increasingly intervening to see that prisoners are placed on parole. [↑](#footnote-ref-8)
9. JICS Annual report 2014/15; 2013/14; 2012/13 [↑](#footnote-ref-9)
10. Combrink versus Another v Minister of Correctional Services and Another, [↑](#footnote-ref-10)
11. Mduzi, J.D (2011;220), “ Unpacking the Law and Practice relating to Parole in South Africa,” P.E.R Journal, Volume 14, No 5 [↑](#footnote-ref-11)
12. Mduzi, J.D (2011;223), “ Unpacking the Law and Practice relating to Parole in South Africa,” P.E.R Journal, Volume 14, No 5 [↑](#footnote-ref-12)
13. [↑](#footnote-ref-13)
14. Pg31-32 of The White Paper for Corrections [↑](#footnote-ref-14)
15. James Garbarino seminar, September 2015, The Warehouse, Cape Town. [↑](#footnote-ref-15)
16. Inmate population remained stagnant at +/- 16000, for a number of years [↑](#footnote-ref-16)
17. In Responsibility, rehabilitation, and restoration: A Catholic Perspective on crime and criminal justice-A Statement of the Catholic Bishops of the United States, Issued by USCCB, November 15, 2000, refer to the four recent national studies that included thousands of subjects are (1) the Treatment Outcomes Prospective Study (TOPS), (2) the Drug Abuse Treatment Outcome Study (DATOS), (3) the Services Research Outcomes Study (SROS), and (4) the National Treatment Improvement Evaluation Study (NTIES). Each of the studies found strong evidence of effectiveness. [↑](#footnote-ref-17)
18. RAND Corporation (1998), no. 2135, in Responsibility, rehabilitation, and restoration: A Catholic Perspective on crime and criminal justice-A Statement of the Catholic Bishops of the United States, Issued by USCCB, November 15, 2000. [↑](#footnote-ref-18)
19. Responsibility, rehabilitation, and restoration: A Catholic Perspective on crime and criminal justice-A Statement of the Catholic Bishops of the United States, Issued by USCCB, November 15, 2000. United States Conference of Catholic Bishops, Inc. All rights reserved. [file:///C:/Users/Public/Documents/Personal/J&P/ST%20MICHAELS/Responsibility,%20Rehabilitation,%20and%20Restoration%20A%20Catholic%20Perspective%20on%20Crime%20and%20Criminal%20Justice.htm](file:///C%3A/Users/Public/Documents/Personal/J%26P/ST%20MICHAELS/Responsibility%2C%20Rehabilitation%2C%20and%20Restoration%20A%20Catholic%20Perspective%20on%20Crime%20and%20Criminal%20Justice.htm) [↑](#footnote-ref-19)
20. Mduzi, J.D (2011), “ Unpacking the Law and Practice relating to Parole in South Africa,” P.E.R Journal, Volume 14, No 5 [↑](#footnote-ref-20)