PRISONERS' RIGHTS

Prisoners' Legal Rights Group Bulletin No 66

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PRISONERS' ADVICE SERVICE
JUSTICE BEHIND BARS

The Prisoners' Advice Service (PAS) is a charity that provides free legal advice and information to people in prison in England and Wales. We produce this bulletin, setting out case law, Ombudsman's decisions and legislative and policy changes relevant to people in prison. The PLRG is free to serving prisoners.

Contents

PAROLE BOARD QUESTIONNAIRE

Included in this issue is a questionnaire from the Parole Board. This is not connected to PAS but we have agreed to distribute it.
It is intended to help them to better deal with the increase in Oral Hearings following the case of Osborne and Booth vs The Parole Board .

CASE REPORTS

LEGAL AID CUTS IN PRISON LAW

R (The Howard League of Penal Reform and the Prisoners' Advice Service) v The Lord Chancellor [2014] EWHC 709 (Admin)

This case concerned two separate claims on related issues regarding the changes to legal aid for prison law introduced by the Criminal Legal Aid (General) (Amendment) Regulations 2013. The first challenge related to the lack of sufficient consultation concerning aspects of the changes and the second related to the removal from the scope of criminal legal aid funding of certain areas and how this has created unacceptable risks of unfair decision making where fundamental rights are at stake, and of interference with the common law and Article 6 ECHR right of access to justice.

The claimants submitted that the consultation was flawed with respect to criminal legal aid funding for Parole Board hearings for pre tariff reviews and return to open condition cases. The substantive challenge focused on the removal from the scope of criminal legal aid in prison law cases in seven areas: pre tariff reviews before the Parole Board, eligibility of women prisoners for mother and baby units, segregation and placement in closed supervision centres, category A reviews, access to offending behaviour courses, resettlement on leaving prison and disciplinary proceedings where no additional days could be awarded.

In respect of the first challenge, the court found there was no breach in the defendant's duty to consult as the common law duty of consultation is triggered only in relation to a fundamental change. The court was of the view the 'fundamentally' different threshold had not been crossed in this case.

The claimants' primary contention was that the removal of criminal legal aid in the selected areas specified above was bound to lead to unfair decision making. The court however did not regard it as arguable that the very high threshold established in the case of *R (Refugee Legal Centre) v Secretary of State for the Home Department* had been met as it was of the view that there has to be a proven risk of procedural unfairness inherent in the system itself.

The court further found no breach of Article 6 ECHR as far as access to justice was concerned and was of the view that the irrationality and *ultra vires* arguments put forward by the claimants were too weak.

Although permission was refused the court did hint to the fact that both claims faced the problem of prematurity and that individual cases might be brought in the future. In the meantime however, the court maintained that the correct forum for advancing concerns regarding the legal aid cuts in prison law remained the political one.

The claims have been appealed; at the time of printing the claimants are awaiting the outcome of the Court of Appeal paper review.

LICENCE CONDITIONS

R (Gul) v Secretary of State for Justice [2014] EWHC 373 (Admin)

The claimant challenged two non-standard licence conditions imposed on him. He was convicted of five counts of disseminating terrorist publications, contrary to section 2 of the Terrorism Act 2006. He was sentenced to a period of five years' imprisonment, and released on licence in 2012.

The first condition the claimant challenged stated that he must not 'attend or organise any meetings or gatherings other than those convened solely for the purposes of worship without the approval of [his] supervising officer'. The second, condition was that he must not 'have in his possession any printed or electronically recorded material or handwritten notes which … promote the destruction of or hatred for any religious or ethnic group or that celebrates, justifies or promotes acts of violence, or that contain information about military or paramilitary technology, weapons, techniques or tactics, without the prior approval of [his] supervising officer'.

These non-standard conditions, which are intended for extremist offenders, are set out in Probation Instruction 07/2011, Annex B. The claimant argued the conditions were (i) tainted by procedural unfairness, (ii) violated the common law principle of legal certainty, (iii) were *ultra vires*, and (iv) violated Articles 8, 10 and 11 of the ECHR.

Procedural fairness
The claimant stated the defendants had failed to adequately involve him in the decision to impose the licence conditions. This ground failed on the basis of evidence that when the claimant was informed of the licence conditions prior to release he had not disputed them at any stage, despite having the opportunity to do so in meetings with his probation officers.

Common law principle of legal certainty
The court rejected the claimant's argument that the terms of the conditions were insufficiently precise. It held that the restrictions imposed on the claimant were clear. Indeed, the claimant's understanding of the relevant restrictions was evidenced by his requesting and obtaining prior approval to attend meetings on several occasions. Furthermore, he had been able to seek advice from both his lawyers and his probation officers, whom he met weekly, so as to foresee to a reasonable degree the consequences of his actions.

Ultra vires and legal certainty
The claimant argued that under s.250 of the CJA 2003 any conditions included in a licence had to be prescribed in the Criminal Justice (Sentencing) (Licence Conditions) Order 2005 (the Order), and that the scope of the Order did not permit the conditions imposed.

The court determined that s.250 of the CJA authorises the Order to prescribe the 'kinds' of 'other conditions' which may engage ECHR rights, and that therefore, the non-standard conditions in question were not in themselves *ultra vires*.

The claimant further argued that the language of the CJA and the Order was so lacking in clarity that it breached the common law principle of legal certainty. The court stressed that the common law test for legal certainty poses a high threshold of uncertainty before a provision may become invalid, and in the instant case, that test was not met.

Violation of the ECHR
The claimant argued that the disputed conditions interfered with his rights un-

der Articles 8, 10, and 11 of the ECHR and that the defendant had failed to show that this interference was 'in accordance with the law', 'necessary in a democratic society', and that a fair balance had been struck.

The court questioned whether the disputed conditions had interfered with the claimant's life to such an extent as to engage the ECHR. However, it held that even if they had done so, in light of the nature of the claimant's offence they were necessary and struck a fair balance.

Accordingly, the court dismissed the application.

HDC (DAMAGES)

McCreaner v MoJ [2014] EWHC 569 (QB)

The claimant is a former prisoner suing for damages. Mr Creaner claimed he spent four months longer in prison than he ought to have done because the prison did not release him at his correct HDC date following the Supreme Court judgment in the case of *Noone [2010] UKSC 30.* Mr McCreaner claimed damages for false imprisonment, negligence, misfeasance in public office and breach of the HRA.

Prior to *Noone,* prisoners were assumed to serve multiple sentences in the order in which they were pronounced in court, and short sentences could not be 'single termed' with longer sentences. As a result, the claimant had been told he was not eligible for HDC, because his last sentence of 2 months – on which his eligibility for HDC relied - was too short.

The Supreme Court judgment in *Noone* was handed down on 30 June 2010, some six months after permission had been granted for Ms Noone to appeal the Court of Appeal decision. No contingency planning had taken place by the defendant in the event that Ms Noone should have won her case given the large number of prisoners that could be affected by the judgment.

On 1 July 2010 the MoJ wrote to prison governors asking them to identify prisoners affected by *Noone*, so that they would be in a position to quickly recalculate HDC, and licence and sentence expiry dates. At HMP Wayland, where the claimant was held at the time, work began to identify prisoners who would need their sentence dates recalculated.

On 13 August 2010 a draft PSI 55/2010 was issued for urgent dissemination, giving guidance to staff in calculating sentences in light of *Noone*.

On 20 August the MoJ emailed all the prisons to implement PSI 55/2010 immediately with a target date of 1 September. HMP Wayland worked over the bank holiday to identify and recalculate the dates of affected prisoners. It became clear that the claimant's eligibility fell in early July, 2 months' previously.

The claimant received a HDC2 form on 2 September, which he promptly returned. For some reason this HDC2 form was not received at the custody office until 9 September. The prison said it forwarded it to probation the next day.

The prison stated they chased the probation service for their report on 5 October. When the claimant's solicitor also chased probation for progress. Probation replied that they only received the request from the prison on 6 October and their report was not due until 20 October.

On 18 October the prison chased probation again and its report was received the following day. On 26 October the governor reviewed the application and authorised release on HDC. The claimant was released on HDC 2 days later, only 16 days before his release date in any event.

False Imprisonment

The claimant argued that he was falsely imprisoned for 119 days from 1 July, when he became eligible for release following the *Noone* judgment, until he was actually released on 28 October.

The court held that the decisions by the Divisional Court and Court of Appeal in the case of *Francis [2011] EWHC 1271 (Admin)* and *[2012] EWCA Civ 1200* were binding in their approach to false imprisonment under domestic law, namely in that a person sentenced to a determinate sentence is required by law to serve the custodial element, subject to the SSJ discretion to allow earlier release and so cannot argue that a breach in exercising that discretion invalidates the sentence or length of the requisite custodial period.

Negligence

The claimant contended that the Defendant owed him a duty to take reasonable care in the administration of his sentence and in decisions concerning his release. The HDC policy prior to *Noone* was itself wrong in law; the prison had a duty to prepare contingency plans as *Noone* was winding itself through the courts; the implementation of the judgment required great care yet it took six weeks for the draft PSI to be issued and even then it gave until the end of the month to complete recalculations.

The court did not accept that the defendant's actions, with respect to its policy, gave rise to an action in negligence. The court relied on the three step approach adopted in *Caparo Industries plc v Dickman [1990] 2 AC 650* of foreseeability, proximity and whether it is fair and just to impose a duty of care. The claimant was not in a sufficiently proximate relationship with the MoJ as regards the formulation and adoption of its policies. The MoJ was acting properly to apply its own policy until the *Noone* judgment; and whilst it could have acted more quickly it was not unreasonable for the Defendant to scrutinise the judgment and work through its implications before drafting guidance.

However the court took the view that the situation changed in early September. The prison had decided the claimant was eligible for HDC, and had indeed been eligible since 1 July. At that point it assumed a responsibility to him to complete the process associated with his release in keeping with government policy. Alternatively it came to a proximate relationship with him under *Caparo* and it was fair, just and reasonable for a duty of care to be imposed from that point.

Further, HDC was not a privilege but rather a normal expectation for those not falling into excluded categories and the prison was at fault for not following the MoJ guidance. It fell well below the standard of care when the claimant had long passed what was known to be his eligibility date. All that was required to discharge this duty was to ensure the claimant's case was expedited. Instead the prison breached its duty of care resulting in the claimant being negligently detained for 6 weeks.

Misfeasance in public office

The court did not accept that the claimant had made out the case for misfeasance. There was no evidential basis that any prison officer had the state of mind, or subjective recklessness

necessary to establish untargeted malice.

Human rights claim
Pursuant to Section 7 HRA the claimant sought damages for the loss of his liberty and invoked Articles 8, 5 and 14 ECHR.

The court did not accept that the claimant's case engaged his Article 8 right to private and family or breached Article 5, since imprisonment was lawful.

The claimant's argument that he was discriminated against in breach of Article 14 was dismissed because of the binding decision in *Clift [2006] UKHL 54* that the nature of an individual's sentence did not amount to 'other status' in order to found a claim under it.

In conclusion all the claimant's arguments failed, but for the claim of negligence following the defendant's calculation in late August 2010 that the claimant was long past his HDC eligibility date. The prison fell well short of its duty of care in not according his application the priority that MoJ policy demanded and as a result the claimant was entitled to damages for the six weeks of detention prior to his eventual release on 28 October 2010.

RECALL

R (King) v The Parole Board [2014] EWHC 564 (Admin)

This case concerned the test to be applied by the Parole Board when deciding whether to re-release an individual who had been recalled to prison. The key question was whether the Board should ask if continued imprisonment was necessary for public protection, or whether it should instead perform a balancing exercise regarding the risks and benefits of release.

In 2008 the claimant pleaded guilty to causing death by dangerous driving. He received a determinate sentence of seven years' detention in a Young Offender Institution. In 2011 he was released on licence. Around two months after his release, he was charged with two offences of common assault. His licence was revoked and he was recalled to custody, but he remained unlawfully at large for around nine weeks.

The claimant sought to judicially review the guidance issued by the Parole Board in December 2013, which addressed the test to be applied in considering a prisoner's re-release. The claimant was re-released in October 2013 but he was recognised as having standing to make a claim for declaratory relief on the basis that he remained at risk of being recalled until the expiry of his licence period.

The Legal Background
Under the CJA 1991, and then the CJA 2003, the SSJ had the power to direct the Parole Board regarding the issues to be considered when addressing the release of a prisoner on licence. The SSJ issued directions in May 2004 regarding the early release of determinate sentence prisoners, which explained that the Board should balance the risks of release against the benefits. In April 2012, the Board considered the claimant's re-release against the May 2004 directions and decided that release should not be recommended.

In December 2013, the parts of LASPO 2012 which amend the statutory regime for the release of prisoners on licence came into effect. It amended s.255 of the CJA 2003 by inserting two new statutory 'public protection' tests, without any mention of a balancing

exercise, that only applied to cases where the SSJ was deciding on a prisoner's re-release and provided no statutory test for cases in which the Board had to consider the re-release of a prisoner sentenced since the CJA 2003 came into force.

However, Schedule 17 of LASPO 2012 introduced Schedule 20B into the CJA 2003, which dealt with the re-release of prisoners sentenced prior to the CJA 2003, and this new Schedule did outline the test that the Parole Board should follow when considering a prisoner's re-release. The test it outlined was one of public protection: the Board must be satisfied 'that it is no longer necessary for the protection of the public that the person should be confined'.

In November 2012, the Board issued a letter to its members which stated that there was a 'new test for the release of all determinate prisoners', and that public protection – rather than balancing– was the key. However, it also noted that LASPO 2012 was silent on the test that the Board should apply when considering re-release after recall.

In July 2013, the Lord Chancellor issued a statement which withdrew the guidance from May 2004 (that which outlines the balancing exercise). He stated that LASPO 2012 'contains a clear and consistent statutory release test that the Board must apply' in determining release, namely, that of public protection. He added that LASPO 2012 applies this public protection test 'to all cases which come before' the Board.

In December 2013, the Board issued new guidance on LASPO 2012 and the test to be applied when considering release. In section 5 of this guidance, the Board explained that public protection was the overriding consideration, and that there was no need to balance risks and benefits. This replaced but resembled the Board's own guidance of November 2012.

The claimant's case was that the Board's guidance of December 2013 was wrong as a matter of law, and should be declared to be so.

The Arguments

The claimant argued that it was of prime significance that LASPO 2012 had deliberately not set out a statutory test for the Board to apply when considering the re-release of a prisoner sentenced since the CJA 2003. In contrast, there were three tests for the SSJ to apply when considering release. Second, he argued that when Parliament passed LASPO 2012 it must have known of the legislative history and case law concerning the tests to be applied by the Board. Third, Parliament must also have known of the guidance contained in the SSJ's directions of May 2004. Fourth, he claimed that the fact that the SSJ has since withdrawn the May 2004 guidance does not in itself mean that the test must have changed. Fifth, he argued that, therefore, in the absence of any statutory provision in LASPO 2012 which expressly amends the test to be applied by the Board, Parliament must have intended for the test to remain as it was.

The Board argued that the legislative and case history 'all demonstrated an intention by Parliament to introduce one single test for actual release', and that this test was one of public protection. It added that it could not have been Parliament's intention that the test for the release of recalled prisoners should be different depending on whether it was the Board of the SSJ who was making the decision.

The Outcome

The court first asked whether the Board

has to apply a statutory test in deciding on re-release. It concluded that some uniform test had to be applied; the Board could not simply act as it wants. Further, although there is no explicit statutory test to be applied by the Board, the legislation strongly indicates Parliament intended the Board to apply the equivalent of an existing statutory test.

In reaching this conclusion, the court considered *R v Parole Board ex p Watson* [1996] 1 WLR 906. Here, Sir Thomas Bingham MR stressed that the function of the Board when considering a prisoner's re-release was almost identical to the function it performed when considering a prisoner's release at the end of his minimum term. Therefore, in the absence of an express statutory provision, the presumption must be that the same test applies in both cases.

The court then asked what that equivalent test should be. It concluded that the existing statutory test that should be followed is that of public protection: 'There is no other possible candidate'.

For these reasons, the claim was dismissed.

Moinul Abedin v Secretary of State for Justice [2014] EWHC 78

The claimant was sentenced to 20 years imprisonment in 2002 following his conviction for committing an act with intent to cause explosions likely to endanger life. In 2012 he was released on licence following from a decision of the Parole Board that, subject to a number of conditions, his risk to the public was reduced so that it could be managed in the community. The Board did not, but intended to, impose a condition that the claimant should not own or use a computer without prior permission from his supervising officer. In February 2013 the claimant was recalled to prison for an alleged breach of that condition. The claimant's request to rescind the recall was refused and he challenged the lawfulness of both the decision to recall him and the refusal to rescind the decision.

The Parole Board was asked to add some further conditions, including the computer condition, by the SSJ but the Board overlooked it so that it was not included. After the claimant was released there was a hearing to consider the computer condition. The claimant was not stopped from owning or using a computer, but had to accept that any computer he did use would be monitored. The claimant objected to it on the basis that when he was permitted to return to live with his wife and two children the only computer belonged to his wife. He believed it would breach her Article 8 right to private life if the computer was liable to be removed from her and inspected.

The claimant was not cleared to live with his wife and children, but could occasionally spend up to two days and nights with them. In January 2013 the claimant was granted weekend leave to stay with his family, on the condition that the police could come and collect the laptop. The family refused to surrender the laptop initially, but when it was surrendered and examined by a police expert it was discovered that the hard drive had been wiped. The receipt of this knowledge led the claimant to be emergency recalled to prison. It was held that emergency recall was properly regarded to be necessary.

In February 2013 the claimant's wife made a statement that the laptop had a fault and so was given to a friend's husband who could fix it. When the claimant's wife heard the request that the laptop be taken by the police, she says

she told her friend's husband to wipe the hard drive as there was personal information and photographs of her unveiled (and she being a strict Muslim held the belief that she was not permitted to expose her face to a male other than her husband). It was doubted why the claimant's wife did not tell anyone that the laptop would have been unavailable for inspection by the police as it was with her friend's husband, and why she did not inform the police of the unveiled pictures so that only a woman examiner could have looked at the laptop.

The court held that the recall was not unlawful because the unexplained wiping of the hard drive and the husband's presence in the house suggesting he had had access to the laptop, could justify it. The Parole Board will now have to consider whether the claimant did in fact breach the computer condition. The court rejected the claim that the recall and refusal to rescind the decision was unlawful.

SMOKING IN CELLS

The Queen (on the application of Solomon Smith) v Secretary of State for Justice G4S Care and Justice Services (UK) Ltd [2014] EWCA Civ 380

The issue in the case was whether it is a breach of a non-smoking prisoner's Convention right to respect for his private life and to equality of access to such rights (ECHR Articles 8 and 14) to compel him to share a cell with a smoker. It was known to the prison authorities that the appellant was a non-smoker and that sharing a cell with a smoker was contrary to his wishes, but he was nevertheless placed in a cell with a smoker for seven nights.

The appellant's case was that being compelled to share a cell with a smoker violated his Article 8 rights by the failure of the respondents to safeguard him against the risk to his health of second-hand smoke whilst he was held in custody. His case was that the policy also unjustifiably discriminated against prisoners as compared with the position of the general public so as to contravene Article 14.

It was held that although the ECtHR recognised the potential of exposure to passive smoke to engage Article 8 rights, 'that question is not to be viewed in a vacuum', but considered with respect to the relevant facts and circumstances of the case. Here it could not be held to exceed the necessary minimum level of interference as the appellant was subject to a relatively short exposure of second-hand smoke. The appellant's experience was of an 'intensity, duration and effect' that did not amount to a violation of Article 8. A similar conclusion was reached in respect to Article 14.

It was unnecessary to consider whether the actions of the respondent were proportionate and justified since Articles 8 and 14 were not engaged.

ADJUDICATIONS

R (Gifford) v Governor of HMP Bure & Secretary of State for Justice (Defendants), & Prisons and Probation Ombudsman (Interested Party) [2014] EWHC 911 (Admin)

This judicial review concerned a challenge to the decision of the SSJ to refuse to quash findings of guilt against the claimant arising from two internal adjudications. The principal complaint was a matter of policy relating to the secure PIN-phone system, which the

claimant argued had led to denial of access to legal advice.

On the facts of the case the court held that the PIN-phone system policy was not relevant to the claim, a point which was conceded by the claimant.

The court was scathing about the remaining points of challenge, which were held both to have no merit and to be matters that should have properly been referred to the Prisons and Probation Ombudsman to determine.

The application for judicial review was dismissed, but at the invitation of the SoS, the judge went on to provide 'very general' guidance on the circumstances in which adjudication cases should be referred to either the PPO, or the Administrative Court for judicial review.

The judge held that the starting point for complaints made by prisoners arising in connection with adjudications is that they are 'generally suitable' for reference to the PPO due to: the PPO's experience of the prison service; the PPO's ability to deal with both merits and procedure; the relative speed with which the PPO can act; and the cost effective nature of the PPO's dispute resolution service. The court noted that it had taken more than a year for the present case to come to a hearing, compared with the PPO's current average complaint resolution time of 19 weeks.

The following examples of cases in which judicial review is the appropriate course were provided by the judge: (i) cases where an injunction is sought and other cases where there is an urgent or emergency element; (ii) cases where there is a challenge with which the PPO cannot deal, such as those which, on analysis, are about the underlying conviction or sentence; (iii) where the complaint is properly concerned with matters of policy.

As a matter of procedure, the judge stated that if a prisoner wishes to challenge an adjudication by way of judicial review they must explain in their claim form how and why the claim is not suitable for resolution by the PPO. If the claimant is asserting a policy challenge, a proper explanation of how and why the challenge concerns a matter of policy will need to be provided.

UPDATES ON PRISON SERVICE INSTRUCTIONS

PSI 05/2014 - SAFEGUARDING OF CHILDREN AND VULNERABLE ADULTS

This PSI concerns amendments to the Safeguarding Vulnerable Groups Act (SVGA) 2006, enabling the Disclosure and Barring Service (DBS) to share information on the barred status of prisoners with prisons and probation services, for the purposes of the protection of children or vulnerable adults.

The work of the DBS was formerly undertaken by the Criminal Records Bureau (CRB). Its main statutory functions are to:

- Process requests for criminal records;
- Decide whether it is appropriate for a prisoner to be placed in or removed from a barred list under the SVGA or Safeguarding Vulnerable Groups Order (SVGO);
- Maintain the DBS children and adult barred lists.

The role of the DBS is to make independent barring decisions on people whose actions or behaviour render

them unsuitable to work (paid or unpaid) in regulated activity with children and/or adults.

The body requires that convictions or cautions for relevant offences should result in an automatic bar from working in regulated activity with children and/or adults. The list of relevant offences can be found in Annex A. The details of regulated activity is also included in the instruction.

Information obtained from the DBS on the barred status of a prisoner and the decision to bar will be taken into account during any reviews of serious harm, sentence plans and risk management plans.

A person placed in the barred list(s) has a right to appeal to the Upper Tribunal Administrative Appeals Chamber (England and Wales) and the Care Tribunal (Northern Ireland). The grounds for appeal are to be that the DBS has made an error of fact or law. A person barred can also make representations seeking a review of their inclusion on the barred list if they can demonstrate to the DBS that their circumstances have changed so significantly that it would no longer be appropriate for them to remain on the lists.

PSI 16/2014 - REVISED SEARCHING POLICY FOR YOUNG PEOPLE

This instruction replaces PSI 08/2012 on the policy for searching young people. It removes the routine mandatory full searching of young people in all circumstances, except those placed on the E-List and Restricted Status. It also requires that full searches only take place on a risk-led basis, on intelligence, or on reasonable suspicion that contraband is concealed on the person. Additionally, routine or random searches may be carried out for a limited period and in response to specific security concerns and following a risk assessment.

This PSI supports the National Security Framework function 3.1 found in PSI 67/2011- Searching of the Person and its guidance is still applicable.

Young offender Institutions must keep records of all full searches undertaken.

On initial reception to a YOI, on transfer out to another YOI and during routine cell searches and visits a male prisoner must be given a level-A rub down, scanned with a hand held metal detector and searched using the BOSS. Those transferring into a YOI from another establishment will be given a level -B rub down search and scanned with a hand-held metal detector.

There is no central mandate for the search of young people on final discharge on completion of a sentence or on discharge for release on temporary licence. The institutions in these situations are to conduct a risk assessment and refer to their local search policies.

Restricted status young people and E-list young people must be fully searched on all receptions, on discharge to court or all other external escorts, as part of cell searches, after visits, work, education or training activities. A risk assessment is to be conducted in all other circumstances where searches may be conducted, for example, to and from exercise, segregation or other internal movements. The level of searching will depend on the level risk the prisoner poses.

The summary table of the requirements for the searching of the young persons can be found in Annex A of this instruction.

PRISONERS' LEGAL RIGHTS GROUP MEMBERSHIP APPLICATION FORM

Please complete this form in block capitals and send it to PAS at the address below:

PAS PRISONERS' ADVICE SERVICE

Name: _____

Company: _____

Address: _____

_____ Postcode: _____

Telephone: _____ Fax: _____

Email: _____ Website: _____

IS THIS A RENEWAL? (Please circle) Yes / No

PLEASE TICK THE TYPE OF MEMBERSHIP REQUIRED:

( )	Prisoners	Free	
( )	Professionals/Other	£50pa	(please make cheques payable to
( )	Voluntary Organisations	£30pa	'Prisoners' Advice Service')
( )	Academic Institutions	£50pa	
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( )	Solicitors and Barristers	£50pa	
( )	Back Copies	£5.00 each	
( )	Ex-prisoners	£10pa	

( ) I would like to sponsor a prisoner PLRG member for one year £10

What issues/themes would you like to see covered in future issues?:

_____

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