

The 19th Annual Martin Tansey Memorial Lecture was delivered by the Hon. Mr Justice Michael White on Thursday 26th February 2026 in the Criminal Courts of Justice, Dublin 8.

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2026 Martin Tansey Memorial Lecture.

The Importance of rehabilitation as part of sentencing principles, and the vital role the Probation Service plays in that principle throughout the Criminal Justice system and some comments on sentencing guidelines and prison overcrowding.

It was an honour to be invited to deliver “the Martin Tansey Memorial Lecture” on the 26th February last. This is a follow up article based on the lecture. While there were experts on the criminal justice system in the audience I decided to aim the lecture at a general audience.

I met Martin on a number of occasions over the years and was always impressed by his commitment to and innovation in developing the Probation Service and his work on rehabilitation of offenders and developing alternatives to custody.

The Probation Service has always and continues to have huge respect from all parts of the criminal justice system including the judiciary.

From my first days as a young solicitor, I admired the comprehensive nature and attention to detail of pre-sentence reports prepared by the Service and the helpfulness of individual Probation Officers.

I am indebted to a number of former colleagues in the judiciary, former colleagues in the Parole Board who had backgrounds in the Irish Prison Service and Probation Service, and a senior official in the Probation Service and Judicial Council who talked to me and gave valuable information for the lecture.

I was also fortunate in having access to recent publications including articles on the issues I examined, in particular “Sentencing a Modern Introduction by Thomas O’Malley, Clarus Press, and Probation and Parole in Ireland, Law and Practice by Vivien Guerin and Shane McCarthy, also Clarus Press.

There is nothing more important when a judge is exercising criminal jurisdiction as the decision to deprive an accused who has been convicted or pleaded guilty of his or her liberty by imposing a sentence of imprisonment. That decision should never be taken lightly. The judge is exercising his or her jurisdiction in the name of the people of Ireland, not by individual whim or preference.

In the serious cases of sexual crime, physical violence, recklessness leading to death or serious injury, imprisonment is nearly always inevitable and the exercise of sentencing principles and discretion focuses on the length of the sentence of imprisonment and any condition to be attached to it.

The difficult cases are those where the decision to impose a custodial sanction is in the balance and consideration is being given to alternatives to custody.

Although murder carries a mandatory life sentence, the Probation Service has a vital role to play in the decision making of the Parole Board.

A focus of both the judiciary as a whole and the Superior Courts during my career as a judge has been the development of sentencing principles, which provide a coherent and consistent approach to sentencing while preserving the necessary discretion of a sentencing judge in choosing the appropriate penalty.

While those sentencing principles are uniform an important distinction has to be drawn between the sentencing responsibilities of judges exercising summary jurisdiction in the District Court and on appeal to the Circuit Court, and judges sentencing on indictable crime in the Circuit Criminal, Central Criminal and Special Criminal Courts.

The opportunity on summary conviction for alternatives to prison is more widespread.

Sentencing principles operate within the wider context of respect for the rule of law, preventing arbitrary justice and cruel and unusual punishment.

Tom Bingham in his essay “The Rule of Law” put it succinctly

“Belief in the rule of law does not import unqualified admiration of the law or the legal profession of the courts or the judges. We can hang on to most of our prejudices. It does however, call on us to accept that we would very much rather live in a country which complies, or at least seeks to comply, with the principle I have stated than in one which does not. The hallmarks of a regime which flouts the rule of law are, alas all too familiar: the midnight knock on the

door, the sudden disappearance, the show trial, the subjection of prisoners to generic experiment, the confession extracted by torture, the gulag and the concentration camp, the gas chamber, the practice of genocide or ethnic cleansing, the waging of aggressive war. The list is endless.”

At the risk of being simplistic, it is important to reiterate the basic principles of sentencing in the Republic of Ireland and how they interact with each other. The principles are underpinned by centuries of moral philosophic thinking and written text, going back to Roman times, and reflect different philosophic approaches.

- Punishment/retribution: This ensures the offender is held accountable for his or her actions. It reflects the seriousness of the crime, satisfies the public’s sense of justice, and ensures the penalty fits the crime.
- Deterrence (general and specific). This aims to prevent future crime. Specific deterrence focuses on discouraging the individual offender from reoffending, while general deterrence seeks to discourage the public from committing similar crimes.
- Rehabilitation: this focuses on the reformation of the offender to help him or her turn from criminal activity. It involves addressing underlying issues, such as addiction or social circumstances, through probation, education or treatment programmes.
- Incapacitation (Protection of the Public): this involves separating the offender from society, through imprisonment, curfews, driving disqualifications, electronic monitoring, to protect the public from further harm.

These can be competing principles with one taking priority over the other depending on the particular circumstances of the offence and that of the offender.

They are knitted together by the core overriding principle of proportionality. A sentence must be proportionate to the gravity of the offence and the personal circumstances of the offender. It requires the judge to locate the offence on a scale of gravity, with maximum sentences reserved for the most serious cases.

Thomas O’Malley in *Sentencing a Modern Introduction*, in his paragraphs on “constructing a proportionate sentence” summarised the jurisprudence of the Superior Courts as follows,

People (DPP) v Flynn [2018] IECA 37 is the seminal decision of the present Court of Appeal on this matter, although there had previously been Supreme Court and Court of Criminal Appeal decisions to the same effect (notably People (DPP) v M [1994] 3IR 306, and People (DPP) v Farrell [2010] IECCA 116.)

Essentially a court must first identify an appropriate sentence (known nowadays in Ireland as the headline sentence) by reference to the gravity of the offence of conviction, and then make appropriate adjustments to reflect the offender's relevant personal circumstances as they exist at the time of sentence. The process was described particularly clearly by the Court of Appeal in (DPP) v Byrne [2017] IECA 97,

“As we have repeatedly emphasised in numerous judgments the exercise of sentencing generally involves a two-stage process. The first stage involves assessing the gravity of the offence with reference to culpability (including aggravating factors tending to increase culpability and mitigating factors tending to reduce culpability), and the harm done, and determining where on the scale of available penalties the offence should be located before account is taken of any mitigating factors not already taken into account as bearing on culpability. In this way the sentencing judge determines on a headline sentence in the first instance.

The second stage involves discounting from the headline sentence arrived at in the first stage for any mitigating factors not already taken into account, such as a plea, previous good character, age, remorse, cooperation, restitution, a good work record, adversities in the accused's person's life and life history, public service or positive contributions to society, good works, efforts at rehabilitation and any other relevant circumstances capable of going to mitigation. In this way the Court endeavours to arrive at a just and proportionate ultimate sentence.

Later in the article I will describe the work of the Judicial Council on sentencing guidelines, and the setting of guidelines in various judgments.

The work of the Probation Service regularly assists the judiciary in assessing a proportionate sentence, but also in implementing the sentence.

The most frequent assistance is through pre-sanction reports and reports to assess suitability for community service. Some sentences may call for ongoing supervision and re-entering in court if conditions are breached, and the Service is also asked regularly by the Courts to monitor behaviour

of an accused whose sentence has been postponed to see how he or she behaves. The Service provides substantial support to a variety of community organisations who promote pro social behaviour in the community. Figures from the annual report revealed 9720 referrals by the courts in 2024, the vast majority being in Dublin, Cork and Limerick.

Separately the Service carries out substantial work in the prisons supporting early release programmes and monitoring and providing reports for Parole Applicants who are serving life sentences. The Service has in tandem with the Irish Prison Service developed pilot programmes of Supervised Temporary Release.

The Service is an independent executive agency within the Dept of Justice family. It is not an independent statutory body.

The legislation governing the Service is still the Probation of Offenders Act 1907. The core responsibility of a Probation Officer is set out in Section 4,

4. It shall be the duty of a probation officer subject to the direction of the court,

a) To visit and receive reports from the person under supervision at such reasonable intervals as may be specified in the probation order or subject thereto as the probation officer may think fit.

b) to see that he observes the condition of his recognizance.

c) To report to the court as to his behaviour.

d) to advise, assist and befriend him and when necessary endeavour to find him suitable employment.

The Service is informed by social work practice and the highly trained Probation Officers have specialised expertise in working with people who have offended , and in assessing and managing risk.

I learned from my discussions, that the Probation Service undertook a fundamental review of its approach and operations and developed a bespoke model of probation practice which aims to achieve better outcomes for probation clients and stakeholders. The Service describes it as The Irish Probation Framework (IPF).

Central to this framework is a belief in people's capacity to change.

Two core tenets are personalisation and co-production.

Personalisation means not taking a one size fits all approach, recognising the unique person with unique circumstances, when creating plans to support them to change behaviour.

Co-production means the Probation Officer and client creating a plan in collaboration and in partnership to address offending and identify routes out of offending.

Risk Needs Responsivity is the primary theoretical underpinning of probation practice in Ireland.

There are three core concepts,

- The risk principle identifies who should be targeted for intervention.
- The need principle identifies what should be targeted during intervention.
- The responsivity principle identifies how the intervention should be delivered.

The Service focuses on eight main identified risk factors,

1. A history of antisocial behaviour.
2. Antisocial personality pattern.
3. Pro criminal attitudes.
4. Antisocial associates.
5. Family/marital relationships.
6. Substance misuse.
7. School or work.
8. Leisure/recreation.

It is not an unconditional relationship. There are clear role boundaries and expectations. The Probation Officer at all times has to attend to the implementation of the Court order.

A fundamental problem confronting the Probation Service and the Courts is the level of recidivism.

The Department of Justice and Equality as it then was commissioned a study by Professor Ian O'Donnell of the Institute of Criminology and Criminal Justice School of Law, UCD on Recidivism and Policy Responses. It was published in May 2020 and relied on Europe wide research

Recidivism was defined in the report as

“ Reoffending, rearrest, reconviction or reimprisonment. It is measured through self-report and data captured by police, prosecutors, courts, and agencies involved in sentence administration. When interpreted with appropriate caution, it is a relevant measure of the performance of a criminal justice system.”

It is difficult to measure statistically and needs to be analysed over a period of time at least three years.

Recent statistics from the Central Statistics Office rely on Pulse records rather than recorded crimes, but are consistent with previous recorded crime statistics which reveal a stubborn problem of recidivism.

Key Findings were,

- In 2024, 61% of detected PULSE crime incidents involved suspected offenders who also had a link to at least one previous crime incident.
- The proportion of detected PULSE incidents linked to re-offending had marginally increased from 57% in 2019 to 61% in 2024.
- The lowest level of detected re-offending between 2019 and 2024 was in 2021, when 56% of crime incidents reported were linked to a historical offender.
- In 2024, 39% of detected PULSE incidents were associated with suspected offenders who did not have any previous PULSE detections.
- Crime incidents relating to Theft, Fraud, Robbery, and Deception (46%) and Coercion, Intimidation or Exploitation (41%) were most likely to involve a suspected offender previously linked to the same type of incident.
- One in five (20%) detected crime incidents reported during 2024 were detected to suspected offenders who had been linked to a separate crime incident less than one month earlier.

This is a very difficult challenge for all those with responsibility in the criminal justice system.

Obviously the general public have very little sympathy for a repeat offender and judges generally when confronted with entrenched repeat offending decide that imprisonment is the appropriate option.

However according to the UCD study, there is a growing body of evidence that short terms of imprisonment are less effective in terms of reducing recidivism than suspended sentences or community service. Planned and structured early release may reduce recidivism, and generally speaking treatment programmes can be demonstrably effective. Motivation and readiness to change are vital.

On the downside the study found that engagement with sex offenders led to statistically significant but modest reductions in recidivism and the results for intervention aimed at preventing repeat domestic violence through education and attitudinal attitudes were disappointing.

The Probation Service as part of the Irish Probation Framework, has emphasised “Desistance” in terms of understanding offending behaviour patterns and how to change them for the better.

It is defined as ‘the process by which people come to cease and sustain cessation of offending behaviour with or without intervention by criminal justice agencies.

This is incorporated in the principal aim of the Probation Service to support community safety by reducing reoffending promoting positive change and behaviour and enabling social reintegration. This is achieved in the day to day work with clients through high quality assessment and effective supervision.

In my opinion a good balance is achieved in sentencing, if it is not unduly harsh or unduly lenient, and the impact of the crime on the victim is carefully taken into account.

The Criminal Justice Policy Review of Policy options for Prison and Penal Reform 2022 -2024 by the Department of Justice sets out a number of guiding principles, the main one being

“A sparing approach to the use of imprisonment. Acknowledging judicial discretion, imprisonment should be used as a sanction of last resort for those who commit the most serious offences, typically those which justify a sentence of 12 months or longer, or individuals who the Courts determine cannot be managed safely in the community.”

Sentencing guidelines judgments and the Sentencing Guidelines and Information Committee established by the Judicial Council Act 2019.

I stated earlier I wished to return to an issue connected to sentencing principles that of judicial guidelines on sentencing.

In Ireland judges have been wary generally of a tariff system of sentencing where individual discretion is prescribed by fixed sentencing.

How sentencing developed after the enactment of section 15A of the Misuse of Drugs Act 1977 as inserted by Section 4 of the Criminal Justice Act 1999 is a case in point. The section prescribed a presumptive minimum sentence of 10 years for sale and supply of drugs in excess of a value of £10,000. Judges while imposing substantial sentences were reluctant to impose the minimum term on accused persons low in the chain of drug supply who in many cases were being manipulated by persons higher up the chain. This caution on mandatory or presumptive mandatory sentencing by the judiciary was ultimately endorsed by the executive when Alan Shatter TD as Minister for Justice, stated that the Oireachtas should be cautious in prescribing mandatory sentences except in exceptional circumstances.

Section 29 of the Judicial Council Act 2019 directed the Minister not later than 2 years after the coming into operation of the section to commence a review of enactments which provide for the imposition of minimum sentences.

The Department completed a review and laid the report before the Oireachtas in May 2024. The review recommended limited changes recommending repeal of statutory provisions that prevent individuals serving presumptive minimum prison sentences for various offences from being eligible for temporary release and parole.

The Supreme Court and Court of Criminal Appeal were reluctant historically to set out sentencing guidelines in respect of particular offences.

In *People (DPP) v Tiernan* [1988] I.R. 250 the Supreme Court while emphasising that the crime of rape should attract a substantial custodial sentence, for a variety of reasons declined to lay down any standardisation or tariff for cases.

The enactment of Section 2 of the Criminal Justice Act 1993 where the DPP could appeal unduly lenient sentences influenced trial and appellate judges to reconsider the issue.

In *People (DPP) v. W.D.* [2008] 1 I.R. 308 Charleton J as a judge sitting in the Central criminal Court, examined all the previous reported and unreported decisions of the superior courts on sentencing for rape in an attempt to divine both relevant sentencing principles and parameters within which a sentence could be imposed, proceeded to define ranges of sentencing from lenient to ordinary to serious.

This approach was approved by the Court of Criminal Appeal in *People (DPP) v. Keane* [2008] 3 I.R. 177.

A more extensive approach of sentencing guidelines was commenced by the Court of Criminal Appeal in March 2014 when three separate judgments on guidelines were delivered on the same day.

These have been followed by a series of guideline judgments.

These judgments seek to provide broad guidance but do not seek to impose any form of standardisation of penalty.

There is an excellent publication by the Judicial Council in October 2021 on its website setting out all the judgments and explaining the reasoning for the developments.

In a development which was not signalled in advance the Oireachtas by Section 23 of the Judicial Council Act 2019, directed the Judicial Council to establish a committee to be known as the Sentencing Guidelines and Information Committee, whose responsibility is to prepare and submit to the Board of the Council for its review sentencing guidelines, and to monitor the operation of the guidelines, collate information on sentences imposed by the courts and disseminate information from time to time to judges and the general public.

Section 24 of the Act established the membership of the Committee as thirteen, eight judges and five lay members.

The nature of the guidelines and what should be taken into account and the responsibility of courts to have regard to the guidelines are set out in Sections 91 and 92 of the Act as follows,

91. (1) Sentencing guidelines to be adopted by the Council under [section 7](#) (in this Act referred to as “sentencing guidelines”) may relate to sentencing generally or to sentences in respect of a particular offence, a particular

category of offence or a particular category of offender.

(2) A range of sentences may be specified in sentencing guidelines that it is appropriate for a court to consider before imposing sentence on an offender in the proceedings before it.

(3) The Sentencing Guidelines and Information Committee shall, in preparing draft sentencing guidelines, or draft amendments to sentencing guidelines, for submission to the Board and the Board shall, in reviewing such draft guidelines, or such draft amendments, take account of—

(a) sentences that are imposed by the courts,

(b) the need to promote consistency in sentences imposed by the courts,

(c) the impact of decisions of the courts relating to sentences on the victims of the offences concerned,

(d) the need to promote public confidence in the system of criminal justice,

(e) the financial costs involved in the execution of different types of sentence and the relative effectiveness of them in the prevention of re-offending, and

(f) such factors as the Committee or the Board, as the case may be, considers appropriate relating to the offence concerned and the offender committing the offence for the purpose of specifying a range of sentences referred to in subsection (2).

Courts to have regard to sentencing guidelines

92. A court shall, in imposing a sentence, have regard to sentencing guidelines relevant to the proceedings before it, unless the court is satisfied that to do so would be contrary to the interests of justice and the reasons it is so satisfied shall be stated by the court in its decision.

Tom O'Malley in a lecture to the Annual National Prosecutors Conference in December 2019, while praising guidelines that allow a reasonable measure of flexibility, as they can greatly assist in eliminating unwarranted disparity and provide a more transparent sentencing process, was highly critical of the process of reform stating,

“The provisions dealing with the creation of formal sentencing guidelines were inserted in the Judicial Council Bill during the

Committee Stage in the Seanad with little debate and as already noted, all stages of the Bill went through the Dail in less than two hours. There were no prior reports, investigations or deliberations on the suitability of such a system in Ireland at the present time. What has happened instead is the English statutory framework has been transplanted to Ireland. By the early summer of 2019, the Court of Appeal and the Supreme court had clearly shown themselves willing to give guidance in the form of sentence ranges. There was much to be said for allowing this practice to continue for some years so that a body of caselaw could emerge that would provide a useful and reliable basis for more formal guidelines. How the Sentencing Guidelines and Information Committee and the Board of the Judicial Council will proceed and in particular how they will go about collecting reliable data on existing practice remains to be seen.”

As of yet no sentencing guidelines have been issued by the Board of the Judicial Council. The Court of Appeal has continued to deliver useful judgments on broad sentencing guidelines.

The documents published by the Council on sentencing directed by the committee have been very helpful and informative, and provided very useful information to judges.

I understand that the Council is still having difficulty procuring accurate sentencing information from the Court Service because of data protection issues.

The publications by the Council to date on sentencing are as follows,

- Sentencing Judgments: October 2021.
- Sentencing information for the general public January 2022.
- Research, University of Strathclyde May 2022.
- Publication of Sentencing data research report December 2022.
- District Court Research, South East Technological University.
- Note on Community Sanctions in Ireland with particular reference to the District Court November 2024.
- The application of the Domestic Violence Act 2018.

Based on judgments of the Superior Courts and the papers already published on balance I am of the opinion that the Judicial Council will not be prescriptive on sentencing guidelines, and any future guidelines will assist the judiciary.

When doing research for the lecture one issue I considered was whether the sentencing principle of rehabilitation could have any impact on prison

overcrowding.

The Irish Prison population is quite low by global standards and moderate by Western European standards, as can be seen from the following comparisons

Imprisonment per 100,000 population.

Spring 2024.

USA 531, Turkey 366, Russian Federation 300, Poland 199,

Hungary 192, New Zealand 173, Australia 157, England and Wales 145,

Scotland 145, Romania 124, Spain 113, France 111, Italy 104, Northern Ireland 98,

Ireland 91, Sweden 82, Denmark 69, Germany 67, Netherlands 65, Norway 56,

Finland 51.

However, prison overcrowding is very severe in Irish prisons at present and has been chronic for some time, as can be seen for the following daily statistics for the 4th February 2026

Prison population 4th February 2026. Prison capacity listed first and actual occupation listed in brackets.

- Midlands 891 (1070)
- Mountjoy (M) 831 (1124)
- Wheatfield 622 (690)
- Cloverhill 433 (480)
- Castlerea 371 (463)
- Cork 304 (396)
- Limerick (M) 338(419)
- Portlaoise 225 (311)
- Dochas Centre 146 (224)
- Loughan House 153 (137)
- Arbour Hill 137 (137)
- Shelton Abbey 121 (114)
- Training Unit 98 (97)
- Limerick (F) 56 (94)
- Total Temporary Release 577

The following is degree of overcrowding by percentage with 100% being capacity.

- Montjoy (M) 135%.
- Dochas Centre 153%.
- Cloverhill 111%
- Wheatfield 111%.
- Midlands 120%.
- Portlaoise 138%.
- Cork 130%
- Limerick (M) 124%
- Limerick (F) 168%.
- Castlereea 125%
- Overall 122%

On analysis of the figures from the last annual report of the Irish Prison Service in 2024 and on talking to former colleagues on the Parole Board it is clear that the problem of overcrowding is not caused by prisoners serving short sentences under 12 months as I initially thought.

In November 2024, 78% of prisoners in Irish prisons were serving sentences of 2 years or more, and I am informed that the position has not dramatically altered.

This certainly presents a problem for Government as the capital cost of the construction of prison spaces is very high and the cost of maintaining a prisoner in an Irish prison on average in 2024 was 99,072 Euro an 11.9 % increase on 2023. The policy also of Government to date is to encourage the use of prison as a punishment of last resort, and for the judiciary to consider alternatives to prison.

A significant percentage of prisoners in custody are low security risk, and there are a number who have serious mental health problems and should not be in a prison setting.

I also know from my experience as Chairperson of the Parole Board that the two low security institutions Loughan House and Shelton Abbey are located in geographically remote areas from most of the prison population.

If extra prison spaces are required as seems necessary because of the degree of overcrowding there seems to be a strong case for the provision of low security and open prison places close to the large cities which would free up space for prisoners who require a higher degree of security.

In a very interesting lecture on the subject “Sentencing At A Time Of Prison Overcrowding” Tom O’Malley makes a number of suggestions.

He highlighted that prison overcrowding should be a factor taken into account in sentencing, and referred to English jurisprudence as follows,

“Prison overcrowding has long been recognised by the English courts as a factor that may properly influence both the choice of penalty and the duration of custodial sentences. There is a consistent line of authority to the effect that imprisonment while at all times the sanction of last resort, should be used particularly sparingly at times of prison overcrowding. It should not be imposed at all unless strictly necessary and where necessary, it should be for the shortest term possible. This was stressed most recently by the Court of Appeal in R v Ali [2023] EWCA Crim 232, decided at a time when there could be no ambiguity about the extent of prison overcrowding because the Government had just requested the use of 400 police cells to hold persons who would otherwise have been committed to prison on remand or under sentence”.

Mr O’Malley also made a case for moderation in criminal punishment as follows,

“Moderation in criminal punishment should I believe be a fundamental principle of sentencing equal in status to proportionality. In fact, the two can be quite compatible. Properly understood, a proportionate sentence is one that is sufficiently severe, but strictly no more than that, to mark the gravity of the offence and the offender’s circumstances. Therefore, if a court is minded to impose a sentence of, say, seven years imprisonment, it should always stand back and ask if a sentence of six years or even five years would suffice and, if not, why not.

Obviously moderation should also be a key value when drawing up formal sentencing guidelines.”

One final issue I wish to address is the insidious nature of gang violence and its pervasive influence.

The Parole Board which I chaired for three and a half years considered many applications for parole from those found guilty of murder in gang related violence. Many of the applicants were only in their late teens and early twenties when committing the crimes, and are now chastened middle age men regretting the devastation they caused other people’s lives and destroying their own.

What struck me was the utter callousness and lack of respect for life.

Many of these youths had only previous minor summary convictions and came under the influence and threat of ruthless people.

Ireland was very lucky in the innovation of the Criminal Assets Bureau, targeting their assets, and also the work of An Garda Siochana in preventing and detecting their crimes.

Irish Prison Service personnel have a huge challenge mainly in Mountjoy prison of keeping them separate which unfortunately involves a lot of the prisoners being under protection with limited time outside their cells.

Martin Tansey Memorial Lectures

Each spring the ACJRD marks the contribution Martin Tansey made to criminal justice in Ireland, and to this organisation with a memorial lecture.

Martin Tansey grew up in Co Roscommon and began his career as a teacher before joining the Probation and Welfare Service in 1965 where he served until his retirement in 2002. He worked tirelessly to bring Government support and public recognition to the work of the Probation Service.

During his long and distinguished career, he guided the development of the Probation Service to the nationwide service we have today.

Martin was a persistent advocate of community sanctions, where the justice system worked with the offender to give them a second chance. He believed the rehabilitation of offenders was a rational social objective.

Martin also had a keen interest in promoting independent criminal justice research. He was a founder member and former Chair of the ACJRD. Information and papers from the lectures which have taken place since the inaugural event in 2008 [can be found here](#).