Guildhall CHAMBERS

Newsletter

CRIME NEWS WINTER 2013

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EDITORIAL

There's no room for Russell Brand in the legal winter of discontent. One would have to be incredibly naïve (and/or a millionaire playboy narcissist) to think that simply shouting about how unfair it all is will achieve political change, or that disengaging is a sensible means of protest. Shouting about fees is unappealing in itself, and bound to be met with derision by a public fed misinformation about fat cats milking the Rolls Royce system of justice (a phrase that jars a little more every time an interpreter who speaks the wrong language turns up for court); and to disengage from the process of consultation is to cede all right to complain about the outcome.

So whilst it may be our right to complain about these cuts, it is doubtless our duty to bear witness to the hidden cost to the public they will involve. Every opportunity to register our dismay must be taken, but supplemented with evidence of the cost to justice and underwritten by alternative ways of reducing waste: there must be no room for anyone to say that the legal profession refuses to talk or is a self-serving monolith. We know the reverse to be true: it is the diversity and the connectedness to the community of our 'marketplace' that we want to maintain. Our complaint is not about our pocket but about choice: the fee cuts proposed by the Ministry of Justice will eliminate meaningful choice for defendants just as surely as price competitive tendering, and will alter the whole ethos of the criminal justice system – and that will have consequences for defence solicitors, the Bar, the CPS, and all public authorities who wish to instruct the Bar. As with PCT, we stand with all our professional colleagues in opposing cuts that would seek to change not simply how we do things but who we are, as we resist the drive to be nudged down from professionals to minions 'working in the legal industry'.

There is sunshine even in winter: Andrew Langdon QC has been appointed as the new leader of the Western Circuit and has been instrumental in bringing the true cost of cuts to public attention with other Circuit leaders through pieces in the Independent and the Financial Times. Guildhall Chambers are proud to have been selected as Chambers of the Year by the Bristol Law Society. And however bleak the season, it always pays to be in good company: we welcome Alastair Haggerty, our new pupil, who will be pursuing an exclusively criminal pupillage under Charles Thomas' supervision; and we congratulate Gregory Gordon on joining the crime team as a tenant following the successful completion of his pupillage. Greg has co-authored with his former supervisor, Rupert Lowe, this edition's piece on answering the key question 'when do I get out?' in his article 'half or two thirds'. Another essential article on sentencing is 'It's life Jim, but not as we know it' by David Scutt, unpicking the LASPO regime on indeterminate sentences. As attitudes to immigration harden yet further, Tara Wolfe has written a timely piece about new defences to false document offences for would-be asylum seekers who otherwise may be deported. Keeping abreast of the law was probably never more important than in the present statute-rich times, and we are always keen to make our newsletters as relevant to our readers as possible. Please email any comments or suggestions to the editor mary.cowe@guildhallchambers.co.uk, who wishes all our readers the very best of the season.

Mary Cowe, Editor

"... it is the diversity and the connectedness to the community of our 'marketplace' that we want to maintain. Our complaint is not about our pocket but about choice"

The Legal 500 UNITED KINGDOM TOP TIER 2012

TOP RANKED CHAMBERS UK 2013 LEADING SET

Will I serve half or two-thirds?

Time was when mitigation for mid-range offences was aimed at keeping the final term below four years, so that the offender would serve half the sentence rather than two-thirds. A defendant receiving 46 months would spend 23 of them in prison, whereas a co-defendant sentenced to 48 months would serve a full 9 months longer (32 months). The law was absurd, creating an artificial cliff in the scale of tariffs which affected a judge's ability to pass a sensible sentence if the target area was anywhere near the 4-year mark. Above all, it was unfair.

LASPO 2012 has finally remedied this anomaly. Since 3rd December 2012 the basic position for a prisoner serving a determinate sentence of 12 months or more, is automatic release upon serving **one-half** of the sentence: s244(1) & (3)(a) CJA 2003 (as amended) [*Archbold* §5-653].

What however, of the historic offender (usually a sex offender) who is convicted of an offence committed before 4th April 2005 (coming into force of the relevant parts of the *CJA 2003*)? Is it half or two-thirds? Recent experience suggests that advocates, judges and even prisons sometimes get confused. The first thing a convicted sex offender will want to know is what his sentence really means. Does 9 years mean 4½ or 6? It is an important difference.

The transitional provisions are now contained in Sch 20A and Sch 20B of the CJA 2003 (as inserted by s121 and Schs 16 and 17 of *LASPO 2012*; in force as of 3 December 2012) [*Archbold Supplement* §5-670a]. The key paragraphs are §4 and §5 of Sch 20B, which are not set out in the main work or the Supplement of *Archbold*, but can be found at www.legislation.gov.uk/ukpga/2012/10/schedule/17/enacted.

Paragraphs 4 and 5 of Sch 20B CJA 2003 provide that the duty to release a prisoner after **two-thirds** of the sentence arises if [and only if]:

- the offence was committed before 4 April 2005;
- the offender was sentenced between 1 October 1992 and 2 December 2012 (inclusive);
- the offender was sentenced to 4 years or more;
- the offender has not previously been released from that sentence; and
- one or more of a number of other conditions set out in §4(3) – (5) of Sch 20B apply (one of which is that the offence is a specified offence within Schedule 15 CJA 2003 - rape, murder, terrorism offences, etc.)

In other words, if someone was sentenced **before** 3 December 2012, and was expecting to serve two-thirds of the sentence, Sch 20B will preserve that position subject to the above conditions.

The Supplement to *Archbold* adds (at §5-670c, p59) that:

"It is submitted that [the transitional provisions set out in Sch 20A and Sch 20B] now only have potential relevance to the release date of an offender sentenced after [3 December 2012] in one situation, *viz.* where an offender serving a "1991 Act sentence" who has never been released from that sentence (and theoretically also an offender serving a "1967 Act sentence" who was never been released) is sentenced to a consecutive term for a fresh offence".

In short, the answer is that an offender sentenced on or after 3 December 2012 to a determinate period of imprisonment (there being other provisions in relation to extended sentences etc) will be released after **half** his sentence has been served, regardless of when the offence was committed. It is only different if the prisoner is already serving a previous sentence at the time of the new sentence and has not yet been released, and the new sentence is consecutive.

So 9 years means 4½. Phew!

Rupert Lowe and Gregory Gordon

Protection from punishment for refugees

The recent Court of Appeal case of *R v Mateta* [2013] EWCA Crim 1372 provides some helpful guidance on the ambit of the defence provided by s31 of the Immigration and Asylum Act 1999 to various false document offences. In that case, the appellants were convicted of offences under s25(1) of the Identity Cards Act 2006 or s4 of the Identity Documents Act due to a failure by their legal advisors to advise on the availability of the defence. The court held that the appellant's defences would "quite probably have succeeded" had they been advanced at trial and stressed the importance of legal advisors making clear the parameters of the defence to enable the defendant to make an informed choice. This article attempts to provide some guidance as to the ambit and scope of the defence.

The prosecution of non-nationals for the possession of false identity documentation is an exercise of the UK's undisputed right and competence to control the entry and expulsion of non-nationals. But, there exists a tension between this right and the right of the refugee to be protected from punishment for their illegal entry or presence in the UK[1]. Given the proliferation of restrictive immigration policies and practices pursued by the UK, from carrier sanctions to visa requirements, the refugee is compelled to gain entry either clandestinely or using false documentation in order to flee persecution. There is no right to enter the UK in order to make a claim for asylum. As stated by Simon Brown LJ in *Adimi*[2] *"Although under the (Refugee) Convention subscribing states must give sanctuary to any refugee who seeks asylum..., they are by no means bound to facilitate his arrival. Rather they strive increasingly to prevent it."*

"Given the proliferation of restrictive immigration policies and practices pursued by the UK, from carrier sanctions to visa requirements, the refugee is compelled to gain entry either clandestinely or using false documentation in order to flee persecution."

Article 31 of the Refugee Convention recognises that the circumstances forcing refugees to escape their country often entails that they flee without valid passports, visas or identity documentation. It provides:

"The Contracting States shall not impose penalties, on account of their illegal entry or presence, on refugees who, coming directly from a territory where their life or freedom was threatened....enter or are present in their territory without authorization, provided they present themselves without delay to the authorities and show good cause for illegal entry or presence."

This article has been given legal effect in the UK through the enactment of section 31 of the Immigration and Asylum Act 1999. This provides:

Section 31

(1) It is a defence for a refugee charged with an offence to which this section applies to show that, having come to the United Kingdom directly from a country where his life or freedom was threatened (within the meaning of the Refugee Convention), he –

a Presented himself to the authorities in the United Kingdom without delay;

b Showed good cause for his illegal entry or presence; and

c Made a claim for asylum as soon as was reasonably practicable after his arrival in the United Kingdom.

(2) If, in coming from the country where his life or freedom was threatened the refugee stopped in another country outside the United Kingdom, subsection (1) applies only if he shows that he could not reasonably have been expected to be given protection under the Refugee Convention in that other country...

(6) "Refugee" has the same meaning as it has for the purposes of the Refugee Convention,

(7) If the Secretary of State has refused to grant a claim for asylum made by a person who claims that he has a defence under subsection (1), that person is taken not to be a refugee unless he shows that he is."

This defence applies to the following offences:

i Part 1 of the Forgery and Counterfeiting Act 1981 (forgery and connected offences);

ii Section 24A of the Immigration Act 1971 (deception);

iii Section 26(1)(d) of the Immigration 1971 Act (falsification of documents);

iv Sections 25(1) and (5) of the Identity Cards Act 2006 (possession of false identity documents) – relevant up to 21 January 2011 only;

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[1] As provided by Article 31 of the Refugee Convention 1951

[2] This was the first case to consider the circumstances of prosecuting for documentary offences those who claimed asylum. It exposed the failure of domestic law to provide immunity against prosecution in accordance with the UK's international law obligations. It was in response to this decision that s31 IAA 1999 was enacted.

v Sections 4(1) and 6(1) of the Identity Documents Act 2010, which replaced Sections 25(1) and (5) of the Identity Cards Act 2006 with effect from 21 January 2011; and

vi Attempting to obtain services by deception, namely obtaining travel tickets – where this is directly linked to the person's attempt to flee (*Asfaw* [2008] UKHL 31).

At the outset, the defence is only available for offences alleged to have been committed pursuant to the refugee's flight from persecution: see s31(5). This includes offences committed in the UK whilst trying to access another territory[3].

The burden on the defendant

The defendant bears an evidential burden to show that there is a "serious possibility" that he is a refugee[4]. Arguably, this means that the defendant need only show a credible account of the possibility of persecution. It remains for the prosecution to prove to the usual standard that the defendant is not a refugee. If the jury are sure that s/he is not that is the end of the matter. For the purposes of providing advice, the granting of refugee status is a declarative as opposed to constitutive act: the person is a refugee and entitled to protection as

[3] *R v Afsaw* [2008] UKHL 31

[4] *Makuwa* [2006] EWCA Crim 175 para 22

such as soon as they fit the criteria of the Refugee Convention. So, even if a defendant has not made a claim for asylum in the UK, or even if they have been refused asylum by the Secretary of State, they may still be entitled to protection under s31[5].

If a defendant asylum seeker has been refused refugee status by the Secretary of State a different, more onerous, burden applies. It is for the defendant to prove to a balance of probabilities that s/he is a refugee: s31(7). This is so despite the fact that s/he would succeed in an asylum appeal by establishing refugee status to a lower standard – a "reasonable degree of likelihood." Interestingly arguments about delaying the decision to prosecute until after a final decision has been reached on the asylum claim have failed[6].

As for the remaining elements of s31, the legal burden rests upon the defence to prove to a balance of probabilities. This infringement of article 6(2) of the ECtHR was held to be justified *"since it represents a proportionate way of achieving the legitimate objective of maintaining proper immigration control by restricting the use of forged passports."*[7] The rationale is *"if the burden on the defendant were no more than to adduce sufficient evidence to raise the issue, the statutory provisions to which section 31 relates would be rendered largely ineffective in the case of all those who make a claim for asylum."* This amounts to a statement of policy: a preference for the criminalisation of immigration over the protection of the refugee. It is unclear why the prosecuting authorities should not bear the burden of proving that the individual, who is a refugee for the purposes of s31, has spent time in third countries prior to arriving in the UK. The law enforcement agencies seem best placed to provide such information regarding the details of international travel. The defendant is unlikely to have more than his testimony. Independent corroboration is unlikely to be available.

The refugee's journey to the UK: coming directly to the UK: s31(1)

If "coming directly" was interpreted restrictively by the courts the defence under s31 would be rendered largely ineffective. Refugees rarely travel directly from the country of persecution to the country of asylum. In recognition of the underlying purpose of article 31 the courts have preferred an interpretation that does not exclude from protection those who in the *"continuing course of flight from persecution"* stop over in transit for a short period[8].

Also, the court has recognised that refugees have some choice about where they claim asylum and that consideration must be given to the length of the stay in the third country and the reasons for any delay[9].

If the refugee spent time in third countries prior to entry in the UK the question is whether or not s/he could reasonably be expected to have sought protection under the Refugee Convention in those countries (s31(2)). It is therefore firstly of paramount importance to discover whether or not the countries that the refugee travelled through are signatories to the Refugee Convention. If they are not, international protection is not available. Secondly, what is the human rights record of the third countries? For example, it has been held by the ECtHR that it is a breach of Article 3 to return an asylum seeker to Greece. Arguably, therefore, a refugee who had spent even a month in Greece prior to their entry to the UK could not reasonably be expected to have sought protection there. Finally, always find out the reasons for any delay. The refugee may be travelling under the direction of the agent and have no control or only limited control over their actions.

Presentation to the authorities "without delay" and made a claim for asylum "as soon as was reasonably practicable": s31(1)(a) and s31(1)(c)

Herein exists the principle limitation to the application of s31. This is in keeping with the stated dual purpose of Article 31: the protection of the refugee from punishment and the encouragement of refugees to make themselves known to the authorities. The court has held that in the great majority of cases there will be no excuse for a refugee not to make himself known immediately s/he arrives in a safe place[10]. However, the very real importance of focussing on the facts and circumstances of each case remains[11]. Those refugees who enter clandestinely may be dropped off in a city and will have no proof of when and how they entered the UK.

"Good cause": s31(1)(b)

This requirement has a limited role to play. A person who can satisfy s31 – i.e. that they are a refugee – will have showed a good cause for their illegal entry or purpose[12]. The fact that different burdens apply to the two conditions does not appear to have been given any thought. It seems illogical that the legal burden for establishing "good cause" rests on the refugee when they bear only an evidential burden for raising a "serious possibility" that they meet the refugee criteria under the Refugee Convention.

Conclusion

Section 31 provides important protection to refugees who have fled persecution on false documentation. It is imperative that the availability of the defence is made known to those who may have entered, or who may be passing through the UK, to escape persecution. And, as an analysis of the case law reveals, the courts have, for the most part, interpreted s31 so as to give effect to the overriding protective purpose of the Refugee Convention.

Tara Wolfe

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[5] Although it may be more difficult for them to satisfy the criteria in the following subsections

[6] See current government policy (UKBA 25th Sept 2012)

[7] *Makuwa* para 36

[7] *Afsaw* para 26 and56

[8] *Afsaw* para 26 and56

[9] *Adimi; R v MA* [2010] EWCA Crim 2400 at para 9

[10] *R v Jaddi* [2012] EWCA Crim 2565

[11] *R v Mateta* para 19

[12] *Adimi*

It's life, Jim, but not as we know it

The Legal Aid, Sentencing and Punishment of Offenders 2012 ("LASPO") has changed the landscape in many ways.

There have been significant changes in respect of 'dangerous' offenders. Sentences of Imprisonment for Public Protection are abolished.[1]

In *Saunders and Others* [2013] EWCA Crim 1027 (CCA) the Lord Chief Justice listed four ('post LASPO'/ LASPO-surviving) categories of offending which will or may attract sentences of imprisonment for life.

Conviction for murder

This category is unchanged. A conviction for murder attracts a mandatory life sentence.

If the offender was 21 years old on the date of the conviction and over 18 years old on the date of the offence – he/she must be sentenced to "imprisonment for life".

If the offender was over 18 years old and under 21 years old on the date of the conviction – he/she must be sentenced to "custody for life".

If the offender was under 18 years old on the date the offence was committed – he/she must be sentenced to "detention during Her Majesty's Pleasure" (regardless of his/her age on the date of the conviction).

"In all cases the court must order that the early release provisions shall apply after the offender has served a part of the sentence specified by the court unless the offender is over 21 and the seriousness of the offence(s) is such that a "whole life order" must be made."

In all cases the court must order that the early release provisions shall apply after the offender has served a part of the sentence specified by the court[2] unless the offender is over 21 and the seriousness of the offence(s) is such that a "whole life order" must be made.

An appropriate starting point must be identified[3] and the court must then identify and take into account any aggravating/mitigating factors (not taken into account in determining the starting point) and specify a minimum term appropriate to the seriousness of the offence(s). The minimum term can be of any length regardless of starting point.

Full reasons must be given in open court.

Time served on remand/half of time served on qualifying curfew[4] will be deducted from the minimum term.

If the offence was committed prior to 18 December 2003 the minimum term cannot be greater than that which the Secretary of State would have been likely to have specified before December 2002[5].

Sentences for life in respect of offences (other than murder) committed before 4 April 2005[6]:

A discretionary life sentence may be passed in respect of certain serious offences BUT before a discretionary life sentence is passed:

a all the rules relating to the imposition of a sentence of imprisonment must have been satisfied;

b the court must be entitled to pass a sentence which is longer than would be commensurate with the seriousness of the offences concerned[7];

c the offence must be punishable with imprisonment for life; and,

d the offender must be eligible for a sentence of life imprisonment under the criteria established in case law.

The criteria for a discretionary life sentence are:

a the offence is sufficiently serious to justify a long sentence; and,

b it is apparent from the nature of the offence(s) and the offender's history that he/she is a person of unstable character likely to commit similar offences in future or is otherwise dangerous;

c the offences he/she is likely to commit are likely to be specially injurious to others.

Normally the court will seek psychiatric evidence (but in exceptional cases it would not); it is not necessary for there to be a mental illness; a

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1 For offenders convicted after 3 December 2012

2 In accordance with Schedule 21, CJA 2003 and any applicable (and compatible) guidelines.

3 Schedule 21, ibid

4 Section 240A, CJA 2003; Schedule 6, Criminal Justice and Immigration Act 2008.

5 Not applicable to offenders under 18 at the time of the offence.

6 Section 82A, PCC(S)A, 2000

7 Section 80(2)(B), PCC(S)A, 2000

life sentence may be passed even if there is no prospect of improvement in the offender's condition but a life sentence should not be imposed if a shorter sentence would secure the safety of the public.

If the court is contemplating passing a discretionary life sentence the defence counsel/advocate must be put on notice and must be allowed to address the court.

If a discretionary life sentence is passed the court should normally specify a minimum term[8] (during which the offender will be required to remain in prison before becoming eligible for consideration before the Parole Board with a view to release).

"Normally the court will seek psychiatric evidence; it is not necessary for there to be a mental illness; a life sentence may be passed even if there is no prospect of improvement in the offender's condition but a life sentence should not be imposed if a shorter sentence would secure the safety of the public."

Offences committed on or after 4 April 2005

Specified offences (adults)[9]

If the offender is 18 years old or over on the date of the conviction and is convicted of a "specified offence"[10] committed on or after 4 April 2005 and the court considers that there is a significant risk to members of the public of serious harm[11] occasioned by the commission by him/her of further specified offences the court must impose a sentence of imprisonment for life (or custody for life if under 21 years old) if:

a the offence is punishable with life imprisonment; and,

b the court considers that the seriousness of the offence (or of the offence and one or more offences associated with it, is such as "to justify the imposition of a sentence of imprisonment for life".

The court must fix a minimum term[12] and the offender may not be released until he has served the minimum term unless the offender was 21 years old when the offence was committed and the court is of the opinion that because of the seriousness of the offence or the combination of the offence and one or more offences associated with it no order fixing a minimum term should be made.

An offender will remain on licence for the rest of his/her life.

[Alternatively, the court may impose an extended sentence (not the subject matter of this article)]

Convictions for a second listed offence[13]

If person 18 years old or over and is convicted of an offence listed in Part 1 of Schedule 15B of the CJA 2003 which was committed on or after 3 December 2012 and the "sentence condition" and the "previous offence condition" are met the court must impose a sentence of imprisonment for life (or custody for life if under 21 years old) unless the court is of the opinion that there are particular circumstances which relate to the offence or to the offender which would make it unjust to do so in all the circumstances.

The "sentence condition" is that the court would impose a sentence of imprisonment/detention for 10 years or more (disregarding any extension period[14]).

The "previous offence condition" is that, at the time the offence was committed, the offender had been convicted of an offence listed in Schedule 15B and was sentenced to:

a A life sentence, custody for life, a sentence of imprisonment/detention in a YOI/detention for public protection with a minimum term of at least 5 years;

b An extended sentence of imprisonment/detention in a YOI or detention with a custodial term of 10 years or more;

c A sentence of imprisonment/detention in a YOI/detention under section 91 PCC(S)A 2000 or any other form of detention for 10 years or more.

Time spent on remand/bail is disregarded.

"The 'sentence condition' is that the court would impose a sentence of imprisonment/detention for 10 years or more (disregarding any extension period)."

Conclusion

Those offenders convicted prior to 3 December 2012 (even if sentenced afterwards) are subject to the 'old regime' (pre-LASPO).

Those offenders convicted after 3 December 2012 are subject to the new (LASPO) regime.

There are currently four situations in which 'life sentences' will/may arise:

a Following a conviction for murder;

b Following convictions for a second listed offence[15];

c Following conviction for a "specified offence"[16];

d Following convictions in cases not falling within the three categories listed above (a residual discretionary power to impose a life sentence exists (despite the Criminal Justice Act, 2003 and LASPO)).

David Scutt

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[8] Section 82A, PCC(S)A, 2000

[9] Ss 225-229, CJA 2003

[10] Schedule 15, CJA 2003

[11] "death or serious personal injury, whether physical or psychological"

[12] Section 82A, PCC(S)A 2000

[13] Section 224A, Criminal Justice Act 2003 (as inserted by section 122, LASPO)

[14] S226A, CJA 2003 is not dealt with in this article

[15] Section 224A, Criminal Justice Act 2003 (as inserted by section 122, LASPO)

[16] Section 225, Criminal Justice Act 2003 (pre LASPO)

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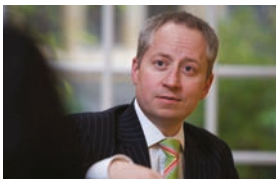

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