# Prison Officers and VIOLENCE

Richard Edney

Prison culture must be changed to ameliorate conditions for prisoners.



If criminal trials are modelled after the Last Judgement, and prison after hell, then judges are modelled after God. Prison officers, however, are modelled after devils, and may well be expected to act accordingly. 1

The rather trite aphorism that people are sent to prison as a punishment, and not for punishment, expresses a humanist sentiment that prisoners should not be harmed while incarcerated other than by the painful incidents of their imprisonment. It is a notion that expresses a remarkable faith in bureaucratic rationality and in the ability of the law to protect prisoners. More puzzlingly, it places an incredible trust, considering the chequered history of humanity, in the benevolence of the state and its functionaries. We expect that the custodial staff of these institutions — prison officers — will respect the rights of prisoners and act towards them in a professional and dignified manner.

We know better but we tend, at the same time, to assume that if prisons are peaceful everything is well within. From my experience as a prison officer this confidence is misplaced because violence does occur and the threat of violence against prisoners is ever present, not only from other prisoners but from prison officers who employ violence as an instrument of social control within prisons. Every prisoner knows, or ought to know, that an infraction of the prison rules may end, as it is known amongst officers, with a 'flogging'.<sup>3</sup> In criminological terms there is a dark figure of crimes committed by prison officers against prisoners which is rarely acknowledged, either in crime statistics or the public consciousness. This violence is more likely than not unjustified and, if justified, is marked by such a disproportionality of response that it amounts to corporal punishment.

What follows is an attempt to sketch an outline of the contours of prison officer violence: its shape, forms, rituals and justifications — in short, how violence and the threat of violence is utilised by prison officers in the life of a prison. My concern is not to place prison officer violence within a criminological or psychological framework, but rather to attempt to convey to the reader a sense of the moral, violent order that prison officers create for themselves within a prison. The use of the word 'moral' is quite intentional because, as will hopefully become clear, the employment of rudimentary moral concepts and language forms just as significant a part of the prison officer's tools when using violence as do the baton or the fist.

#### Reading prison officer violence

Before considering the stories told by prison officers to each other to account for their violence, it is worth noting the dearth of scholarship about this particular aspect of prison life.<sup>4</sup> The lack of consideration is partly the result of a tendency of researchers, usually criminologists, to ignore or underplay the significance of a prison officer's contribution to the lives of prisoners whilst incarcerated.<sup>5</sup> Epistemologically, prison

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officers are taken as given: uneducated, prone to violence and a familiar part of the prison that requires little further elaboration. Prison officers who are violent towards prisoners are labelled as sadists or thugs who by virtue of being prison officers are able to give free reign to their hitherto dormant, violent impulses. Such stereotypes, although functioning as convenient intellectual shortcuts, take us little further in attempting to understand this cruelty.

The scholarship that we do have and, in particular, criminology has bemoaned the lack of access to prisons to conduct proper research. The problem is thus presented as being of a technical nature<sup>6</sup> rather than criminology's inability to conceive of the state and its actors as criminal, and its lack of a theoretical understanding of state violence. Stanley Cohen has labelled the failure of criminology to bring state violence within its sphere of inquiry as one of 'denial', with the result that criminology's talk about violence is sorely partial.<sup>7</sup> It is beyond the scope of this article to consider the intellectual history of criminology in its own right, but the failure by criminology to relate the problem of state violence to other manifestations of criminal violence is part of a wider cultural process by which we know that terrible things occur in prison but we tend to ignore them.

So how do we know about the violence committed by prison officers? We certainly would not find it in the text-books and journals of criminology with their concerns with violence of working class and predatory criminals. Occasionally we may read newspaper reports, view exposé documentaries, and follow the proceedings of Royal Commissions when violence reaches a critical level. However, as to the mundane, day-to-day acts of violence and terror that occur in our prisons we remain comfortably oblivious.

A potential, yet neglected, source of information about this violence is prisoners' own writings. Unfortunately this scholarship is ignored by the dominant way of knowing that is criminology. Criminology and its fixation with methodology, objectivity, restrained language, and appropriate form does not know what to do with these writings. So it ignores them. Prisoners' contributions break all the rules of academic conventions. Their writings are often personal, angry, imbued with sorrow and outline with great clarity what happens when we imprison someone. Instead of incorporating these insights into more scholarly writings on prisons, or using this knowledge base of prisoners to generate hypotheses for future research, criminology ignores them and the result is a criminology which is partial, irrelevant and seemingly produced solely for the pleasure of researchers rather than a serious attempt to comprehend violence in all its forms.9

# Prison officers and the construction of the 'Good'

This impoverished conception of the role of prison officers, and the refusal to listen when prisoners talk about the violence committed against them by prison officers, ignores the pivotal role prison officers play in shaping the conditions under which prisoners live and, in particular, the conditions under which violence is justified. This conception of the role of prison officers ignores the fact that, while incarcerated, prisoners do not have their own conception of the Good in the sense that the inherent structure of prison ensures that prison officers are in control of the minutiae of prisoners' daily existence. This totalitarian basis is evident in the daily routine of the prison. Random cell and strip searches<sup>10</sup> and the lack of any sensible notion of privacy are the most

obvious examples. The times when prisoners are to eat, to sleep and work are not determined by consent or free agreement but by the administration of the prison and the prison officers who give effect to this policy. The extent of this control is great and the result is the investing of prison officers with a belief that any steps necessary to preserve their conception of the Good of the prison are justified. This idea of the 'Good' is the basis on which violence is justified because it allows prison officers to connect the moral justification of their violence to the overriding objective of the prison: security and good order at any cost. By allowing their violence to be justified by reference to the greater collective good of the prison, prison officers are able to rationalise and situate their violence as a necessary means of control. In this way the authority of prison officers is maintained and the notion that prisoners must subscribe to the way of life determined by prison officers is reinforced.

Formally, this notion of the Good is reflected in the statutory language that prison officers have the power to use reasonable force to maintain the good order and security of the prison. A liberal interpretation of these provisions and the lack of any effective sanctions or regulatory scheme allows prison officers to defend their version of the Good by violence if necessary. Crucially, prison officers can look to the protection of the law to ratify what they view as moral actions when using violence against prisoners, and to clothe with legality acts which, if committed outside the social space of the prison, would visit the actors with serious criminal charges.

# The geography of prison officer violence

Violence by prison officers tends not to be random or unsituated but is informed by certain geographical and ritualistic features. Ideas of space, the need to isolate prisoners, and the avoidance of the gaze of implicating witnesses are prominent considerations in determining where violence is to occur. Most assaults do not occur in the open (there may be witnesses). Officers prefer concealed places such as cells, observation cells, strip search and reception rooms and showers (although anywhere is good enough provided the prisoner is alone and no-one can hear or see).

A typical instance of the ritual that this violence may take is that a prisoner may be brought, after an alleged infraction of the prison rules, 12 to a management or separation unit. Officers will surround him and he will be ordered to stand on a line ostensibly for the purpose of a strip search before his placement in a management cell. During this strip search and depending on the perceived seriousness of the infraction of the prison rules he may or may not be taunted and abused, he may or may not be slapped across the head (a slap leaves no bruises) and if he responds in any way, for instance by clenching a fist or making a remark, batons may be produced and he may be flogged. If a prisoner has committed the most serious infraction of the prison rules — assaulted an officer — this charade will be forgotten and a flogging will occur as a matter of practice on the prisoner's arrival at the unit.

Assaults may also occur after prisoners have been secured in their cells for the night. For instance, a prisoner may have been deemed a 'troublemaker' by staff within the unit during the day and he will be removed from his cell after lock-up to be warned that his behaviour will no longer be tolerated. Depending on the prisoner involved and the officers working that day, what follows may be similar to that described above. Generally, the purpose of this exercise is more to warn the

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prisoner that if he does not 'keep his head in' certain things may happen to him. A slap across the head may or may not be accompanied with this warning as an indication of what may follow if he does not comply.

These examples could be multiplied endlessly, but the common elements remain constant. First, prison officers need to find a clandestine space within the prison to commit acts of violence and intimidation, in short, a prison within a prison. In general, open, 'public' acts of violence against prisoners do not occur. The possibility of witnesses is an ever present threat and the benefit for prison officers of committing violent acts in clandestine spaces is that the possibility of corroborative witnesses to support the prisoner's complaint are dramatically reduced. It is unlikely that a prison officer will report other officers for their behaviour. It is also unlikely that a prisoner's version of events will be believed against a group of officers who claim that the prisoner threatened or assaulted them first.

Second, and a corollary of this desire to commit acts of violence in private, is that most prisoners are assaulted individually. The powerlessness of the prisoner is increased when he is alone. There is safety in numbers. When there are no witnesses an officer can commit violence with impunity, confident in the knowledge that his version of the 'truth' will prevail if the incident is ever investigated following a complaint by a prisoner.

Just as the rituals of prison officer violence follow a certain process, so do the reports or documentation completed after a violent incident between staff and a prisoner. In most cases nothing is recorded. Officers prefer not to leave a paper trail which may in the future lead back to them. If, however, the violence used was particularly excessive in the sense that the prisoner suffered visible injuries or there was a belief that the particular prisoner would be likely to make a complaint, the officers involved may write a report that justifies the violence inflicted. These reports are structured in a way that a reader would be led to the conclusion that the force used was reasonable and proportionate in all the circumstances. The prisoner clenched his fists; he threw the first punch; the injuries that he sustained resulted from officers restraining him; he feigned his incomprehension of English when we know he could understand English; we used reasonable force to make the prisoner comply with our lawful order. These and other stock-in-trade justifications are readily available to prison officers in the aftermath of a violent incident.

As an alternative to writing a report, the officers may complete a Use of Force Register. This is a register which is completed whenever force is used on a prisoner and, in theory, is for the protection of the prisoner because it compels prison officers to explain the circumstances under which force is used and thus allows an evaluation as to whether the force used is justified. In a perverse way, however, this register may be used to the advantage of officers in that it allows them to tell their story of what happened prior to investigation and to obscure their actions through the legal character of this register. Of course, the prisoner has no input to this register apart from being characterised as the aggressor in the incident whose actions caused the officers to restrain him with violence. If a prisoner makes a complaint, which is unlikely, then officers have this register at their disposal to corroborate their version of events.

# **Righteous violence**

As outlined above, when using violence prison officers proceed through familiar rituals and patterns of behaviour, from the use of violence itself right through to the recording and justifying of the incident. Buttressing this violence is a moral dimension in which prison officers attempt to justify, at least to each other, the violence that they carry out through the use of rudimentary normative concepts. The notion of 'desert' is critical here in that this moral category, more than any other, is utilised by officers to justify their behaviour. It is also a notion that is connected to the idea of the Good and gives, at least for prison officers, a moral, and thereby legitimate basis for their violence, notwithstanding the factual implausibility of their claims in many instances.

The idea of desert is a familiar moral concept in which we praise or blame others for their conduct or behaviour. In the prison context, a prisoner is deemed to have 'deserved' the violence inflicted on him by a transgression or perceived transgression of the hierarchical order established within prisons. In prison speak, the prisoner has threatened the good order, security and management of the prison. This does not mean that the prisoner has broken any prison rule, although he may have. Rather, use of violence is a product of what individual officers believe deserves a violent response.

This changes over time and not only between prisons but within particular prisons and between particular officers or groups of officers. For instance, violence is more likely to be inflicted in management or separation units than mainstream units. This is not only because in management units prisoners are outnumbered, but also because the regime is generally stricter and the officers in these units have a working philosophy that prisoners are doubly deserving of any violence. The message is clear: not only are you a prisoner which makes you less deserving of respect, but you have also breached the hierarchical order established by officers to ensure that the good order and security of the prison is maintained. Of course this is not written down, and you will not find it in the Department of Justice annual report on prisons or in a criminological text. Nevertheless it forms part of the informal working ideology to which officers may have recourse in determining whether or not to use violence in a particular situation.

As noted above, officers vary in their understanding of what constitutes a justifiable ground for using violence against prisoners and often this is a product not only of an individual's predisposition and personality, but also of where they work within the prison. As a general rule, prisoners are most likely to become victims of violence from officers working within the prison's internal security group or officers located within management or punishment units. Officers who work in mainstream units may also use violence, but as they tend to work with the same prisoners every day, violence is rather a crude and cumbersome way to deal with problems that may arise in the unit. Verbal control and persuasion is often more profitable in these units and is the preferred method of control. Also, these officers are more likely to know the prisoners on a personal basis which reduces the dehumanising effects of the prison environment. 13 Put simply, the moral distance<sup>14</sup> between the officers and prisoners is narrower and tends, therefore, to curtail the resort to violence. In contrast, officers in management or separation units may not know the prisoner and, therefore, tend to view their relationships with prisoners differently. They see no need to resort to less violent means to solve a problem because they will probably

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not have to work with the prisoner the following day. They view their role as that of trouble shooter, available to provide a quick, short, violent response to reinstate order on the basis of what they believe to be in the interest of the good order and security of the prison.<sup>15</sup>

This violence not only has the moral component of desert but may also have an instrumental one in that the infliction of violence is viewed by officers as acting as a deterrent to any future threats to the prerogative of their right to control prisoners. The fact that once released from the punishment or management unit a prisoner will tell other prisoners what happened to him means the word is spread that any prisoner who does not comply is likely to be dealt with severely.

On occasions this violence may be composed of a mixture of moral and instrumental purposes. For instance, a group of prisoners may be standing over and intimidating vulnerable and younger prisoners. Officers knowing that prisoners subscribe to a code that one does not inform on other prisoners will take it on themselves to protect the prisoners who are at risk, by standing over the aggressors. In this way the officers affirm the ethical principle that the strong should not prey on the weak and also attempt to deter those prisoners who are contemplating threatening other prisoners. Of course, the officers are themselves participating in activities that are contrary to that principle, but they have recourse to the idea that anything which is for the good order and security of the prison is justified — that ubiquitous idea that pervades prison officer culture and under which virtually anything is justified.

Thus, a violent interaction between a prisoner and prison officers will be the result not merely of craven, sadistic impulses (although that may be the case) but also of the need of prison officers to preserve a version of the Good which may be threatened by an act of resistance or subordination by the prisoner. By violently affirming their version of the Good, officers give a concrete, physical realisation to the ideology of every prison that the security and good order of its operation is to be preserved at all costs. To do otherwise, according to the working ideology of prison officers, is to allow prisoners to project their own version of the Good, a state of affairs which is intolerable because it runs counter to the end that prisoners ought not to have any meaningful control over the central features of their daily lives.

## What is to be done?

Solutions proffered by prisoner rights groups and other wellintentioned organisations often suggest that the way to prevent this violence is to expand the ambit of rights available to prisoners, or to establish an independent body to investigate prisoners' complaints of ill treatment. 16 Unfortunately, such groups eulogise the power of the law to protect prisoners and underestimate the strength of the prison culture to override the requirements of legal standards and basic morality. Crucially, such groups do not realise that the prison environment is a social space that is almost primitive in the sense that the prisoner cannot appeal to a third party (for instance, the police) for protection. The prison does not resemble civil society as we understand it but is more akin to a Hobbesian state of nature in the sense that there is no sovereign standing between the prisoner and the end of the officer's baton. Thus, the shape or content of the statutory regime which is in place purportedly to protect the rights of prisoners is irrelevant where the intent of officers is to inflict violence on a prisoner they believe has acted in a manner deserving such a response. All the prisoner has to protect him is the goodness or otherwise of the prison officers who are inflicting the violence and their sense of whether he, the prisoner, has had enough. In this sense the law is certainly not sovereign, nor is it protective. Prison culture is so omnipresent and so powerful that it short circuits or destroys the ability of the law to protect prisoners and it is nonsensical to suggest that a further elaboration of prisoner rights, or an improved system of investigating prisoners' complaints will help remedy this situation whatever humanist impulses may lie behind its genesis.

What is required, in my view, is the development of ethical countercultures within our prisons that reduce the corrosive effects of dehumanisation on prison officers' decision making. This itself may be difficult given that the processes and structures of prisons are constructed in a way that encourages prison officers to view prisoners as objects rather than subjects and as people deserving of few rights. However, some change may be possible if the status of prison officers as an occupation can be improved so that officers are viewed as deliverers of human services rather than traditionally as mere turnkeys.<sup>17</sup> Professionalism of the prison service is essential not only to improve the treatment of those we imprison, but to increase the job satisfaction and skills of officers so that resort to violence is not to be considered the natural or inevitable response to a prisoner's threat to officers' collective authority. Of course violence will still occur, but if the training and status of prison officers can be enhanced we may expect, at least, more critical determination by them of whether violence should be used in a particular instance.

#### Conclusion

The processes of dehumanisation that we allow in our prisons, and the prison's own paramilitary type structure are the first steps towards the violence committed by prison officers. As this occurs, and where prison officers consequently come to view prisoners as less than human, a moral vacuum is created and in its place is a culture of violence that is far too easy for officers to participate in. This violence is nurtured by prison officer mateship which stipulates that one always supports officers who have been violent no matter what they have done. This unwritten rule and the de facto legal immunity that this informal code guarantees, ensures that prison officers are a virtual law unto themselves as far as violence against prisoners is concerned.

The solution to this problem lies not in a further elaboration of prisoner rights or a judicial inquiry. At the day-to-day level of prison administration, prisoner rights are rendered nugatory by the power of the prison culture and will be of little comfort to a prisoner who has been or may be a victim of prison officer violence. As discussed above, what is required is the development of an ethical counterculture within prisons that reduces the insidious effects of dehumanisation on prison officers' decision making that deems violence as necessary and morally justified. This will require not only an elevation of the status of prison officers as an occupation but also the cultivation of a management regime which displays moral leadership by actively articulating and enforcing the standards of humanity and basic decency that a community should expect of its prison system. To the extent that the prison system has within it the sources of solidarity that encourage violence it may have the resources to ameliorate the situation. That this occurs is crucial, and not only for the sake of those we imprison, but also for those we assign to staff prisons on our behalf.

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#### SAME-SEX RELATIONSHIPS AND THE LAW

- 7. The exception to this relates to visiting one's partner in hospital and consenting to medical treatment when he or she is unable to do so; in such circumstances, de facto recognition in the absence of registration is appropriate.
- Although I note that it might not be possible for the Victorian Parliament to regulate certain issues concerning children that fall under the Commonwealth's purview.
- 9. Notably, in NSW heterosexual de facto couples' rights and responsibilities are dealt with by a single Act, the De Facto Relationships Act 1984 (NSW). This is not the case in Victoria, where individual pieces of legislation govern which relationships are recognised for particular purposes.
- 10. Adoption is dealt with by separate legislation (the Adoption of Children Act 1965 (NSW)) which will not be amended: cl.8(2) and Sch 1. Nor will superannuation arrangements be affected, because of the overriding Commonwealth scheme which is discriminatory and cannot be altered by State legislation.
- 11. Indeed, the extension of access to heterosexuals came about only because it was apparent that their exclusion was constitutionally invalid by virtue of the Commonwealth's Sex Discrimination Act, which prevents discrimination on the basis of marital status, and s.109 of the Constitution: see Pearce v South Australian Health Commission (1996) 66 SASR 486.



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#### References

- 1. Gilligan, J., Violence, G.P. Putnam's & Sons, New York, 1996, p.159.
- 2. See Sykes, G., The Society of Captives, Princeton University Press, New Jersey, 1958, pp.63–78, where he outlines what he terms the 'pains of imprisonment'. Those pains according to Sykes are: deprivation of liberty, deprivation of goods and services, deprivation of heterosexual relationships, deprivation of security, and deprivation of autonomy. While this list is not exclusive and probably does not comprehend totally the physical and psychological effects of imprisonment, it does tend to lay bare what we do when we imprison someone.
- 3. The word 'flogging' and the consideration of it as a specific penal practice is now relatively neglected in the sociology of prisons. Floggings and the beating of prisoners are now historical relics of previous times when our prisons were more brutal and the power of prison officers more capricious. For an example see Spierenburg, P., 'The Body and the State: Early Modern Europe' in Morris, N. and Rothman, D. J. (eds) The Oxford History of the Prison, Oxford University Press, Oxford, 1995, pp.49–76. For an account of the floggings and beatings that still figure in the repertoire of the state in its dealings with populations that it finds threatening, see Millet, K., The Politics of Cruelty, Penguin, 1994. For prisoners' own accounts of this violence and the floggings that still occur see Abbott, J., In the Belly of the Beast, Vintage, 1981, pp.57–62; Eastwood, E., Focus on Faraday and Beyond, Coeur de Lion, 1992, pp.79–85; Anderson, T., Inside/Outlaws: A Prison Diary, Redfern Legal Centre Publishing, Sydney, 1989, pp.86, 102–3.
- 4. There are, of course, exceptions. See Bowker, L., Prison Victimisation, Elsevier North Holland, New York, 1980, ch. 7; Wright, M., Making Good: Prisons, Punishment and Beyond, Burnett, London, 1982, pp.60-6; Bowker, L., 'An Essay on Prison Violence', (1983) 63 Prison Journal 24; Johnson, R., Hard Time: Understanding and Reforming the Prison, Wadsworth, California, 1987, ch. 7.
- See Hawkins, G., *The Prison*, Chicago University Press, Chicago, 1976, pp.83–5.
- 6. For arguments of this kind see, Jupp, V., Methods of Criminological Research, Unwin and Hyman, London, 1989, pp.138-9; Morgan, R., 'Imprisonment' in M. Maguire, R. Morgan and R. Reiner (eds), The Oxford Handbook of Criminology, Oxford University Press, Oxford, 1994, p.927.
- Cohen, S., 'Human Rights and Crimes of the State: The Culture of Denial', (1993) 26 ANZJ Crim 97. See also, Sullivan, R., 'The Tragedy of Academic Criminal Justice', (1994) 22(6) Journal of Criminal Justice 540

- See ref. 3. Also, Orland, L., Prisons: Houses of Darkness, Free Press, New York, 1975; Franklin, B., Prison Literature in America: The Victim as Criminal and Artist, Oxford University Press, New York, 1989; Norman, F., Bang to Rights, Hogarth Press, London, 1987; T. Parker (ed.), The Violence of Our Lives, Harper Collins, London, 1995.
- 9. For examples of researchers utilising prisoners insights see, Sim, J., ""We Are Not Animals, We Are Human Beings": Prisons, Protest, and Politics in England and Wales, 1969–1990', (1991) 18(3) Social Justice 107; Sowle, S., 'A Regime of Social Death: Criminal Punishment in the Age of Prisons', (1994) 22 New York University Review of Law & Social Change 497.
- 10 See George, A., 'Sexual Assault by the State' (1993) 18(1) Alternative Law Journal 31. For the legislative authority for strip searches see Corrections Act 1986 (Vic.), s.45.
- Corrections Act 1986 (Vic.), s.23(2). In respect of police gaols a similar provision applies. See Corrections Act 1986 (Vic.), s.9CB.
- 12. Corrections Regulations 1988 (Vic.), reg. 74. Note, however, the broadness of some of the offences under this Regulation and, in particular, reg. 74(i), (k), and (l). The breadth of these provisions gives considerable flexibility to prison officers in determining not only if an offence has allegedly been committed, but also 'feeds' back into s.23(2) of the Corrections Act 1986 (Vic.) in grounding a basis for the use of force by prison officers.
- 13. See generally, Johnson, R., 'Institutions and the Promotion of Violence', in Campbell, A. and Gibbs, J. (eds), Violent Transactions: The Limits of Personality, Basil Blackwell, London, 1986, pp.181-205. Also see, Kelman, H., 'Violence without Moral Restraint: Reflections on the Dehumanisation of Victims and Victimisers', (1973) 29(4) Journal of Social Issues 25.
- Glover, J., Causing Death and Saving Lives, Penguin, London, 1977, pp.286–97.
- For an account of the methods of these 'goon squads', see above, ref. 4, Bowker, 1980, p.102.
- 16. For some examples see, Bedau, H., 'How to Argue About Prisoners' Rights: Some Simple Ways', (1981) 33 Rutgers Law Review 687; Zellick, G., 'The Case for Prisoner's Rights', in Freeman, J. (ed.), Prisons Past and Future, Heinemann, London, 1978, pp.105-20; Richardson, G., 'Time to Take Prisoner's Rights Seriously' (1984) 11(1) Journal of Law and Society 1; Hawkins, G., 'Prisoner's Rights' (1985) 18 ANZJ Crim 196.
- See Hill, I., 'The Professional Role of Prison Officers', in Biles, D. (ed.), Current Australian Trends in Corrections, Federation Press, 1988, pp.8-14.

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