

Courts and the Making of Public Policy

Trusting the Courts in Times of Internal Strife

Professor Fionnuala Ní Aoláin

The Foundation for Law, Justice and Society

in affiliation with

The Centre for Socio-Legal Studies,
University of Oxford

www.fljs.org



Executive Summary

- Courts in democratic countries face unique challenges when dealing with crises. Situations of crisis and emergency pose particular problems of legal definition, which are exacerbated when the emergency is activated by internal domestic crisis.
- In democratic states, whether constitutionally based or not, most judges are usually engaged in a process of 'interpretative accommodation'. Here the validity of exceptional norms is generally not in question; rather interpretation of scope, meaning, and effects are the core inquiries for the courts.
- Experience across jurisdictions shows that, when faced with national crises, the judiciary tends to become sensitive to the criticism that they impede the war effort. When faced with internal or communal strife, judges are rarely in the oppositional camp to government, and are structural stalwarts to government precisely because their elite and political interests may be equally threatened by violent actors.
- Historical and contemporary experience suggests that courts underperform in the protection of rights and as a brake on the executive action during crisis. However, some cross-cutting positive patterns can be discerned. There are important affirmative aspects to judicial oversight and presence during crisis. Courts offer both symbolic and practical redress which acts both as a balance and a constraint to excessive executive responses.
- Courts offer mediation, remediation, and the ever-present potential of exerting constraint on executive action during moments of exceptionality. Whether this capacity is exerted in any particular crisis is not per se determinative of overall judicial influence.

Trusting the Courts in Times of Internal Strife

Situations of emergency and crisis pose significant challenges to all branches of government, none more so than the courts. Courts in democratic states face unique tribulations, though there is increasing recognition that even in authoritarian contexts, courts can continue to play an important part in challenging and channelling a state's recourse to crisis powers. This analysis will focus primarily on the courts' role in democratic states, with emphasis on the role of courts during violent internal crises.

The focus on courts in democratic regimes is important to qualify. Dealing with crises is not, of course, limited to democracies. However, authoritarian regimes are not faced with the tragic choices that violent or communal emergencies present to democracies. For the former, the usual significant parameters by which to evaluate the state's response to violence are efficiency, allocation of resources, and the political and perhaps physical survival of the regime. No real tension exists between liberty and security, because security is everything and liberty does not count for much, if at all.

For democracies, however, the story and calculus are different. To what extent, if any, can violations of liberal democratic values be justified in the name of the survival of the democratic, constitutional order itself; and if they can be so justified, to what extent can a democratic, constitutional government defend the state without transforming itself into an authoritarian regime? For this analysis, the central inquiry is what role the courts can and should play in the defence of liberty and rights, whether courts play an inherently different role from the executive, and whether the courts discharge those functions adequately and fairly. This analysis is focused on violent crises and emergencies, rebellions and terrorist attacks with a particular emphasis on their appearance in an internal domestic context, as distinguished from economic crises and natural disasters.

Defining crisis

In order to assess how the courts perform in the context of crisis the starting point must be definitional. The problem of definition is particularly acute in the context of communal strife where distinguishing between legitimate dissent and genuine threat has provided significant challenges for states and their legal institutions. Crises frequently provoke the wide use of emergency powers by government. The vast scope of such powers, and their ability to interfere with fundamental individual rights and civil liberties emphasize the pressing need for precisely defining the situations in which they may be invoked. Yet, defining what constitutes a 'state of emergency' is no easy task. This problem of definition is the core interpretative task that courts attend to, and any judgement on the performance of the judiciary is often linked to a judgement on whether their 'call' on the nature, form, and extent of the crisis is rightly made.

Whatever the tools used to attend to this definitional problem, some terms are inherently open-ended and malleable. The malleability poses some unique challenges when measures are designed to confront internal emergencies. Consider, for example, the understanding of the term 'public emergency' under Article 15 of the European Convention for the Protection of Human Rights and Fundamental Freedoms as, 'a situation of exceptional and imminent danger or crisis affecting the general public, as distinct from particular groups, and constituting a threat to the organised [sic] life of the community which composes the State in question' (4 November 1950). Communal strife runs the risks of simultaneous overreach and overreaction because both political and legal actors may not have sufficient distance from the crisis in hand to even-handedly manage the challenge or to assess the depth of the threat to the state and its institutions. Proximity frequently inculcates blind spots.

The difficulties in determining when a state of emergency exists in fact, coupled with the tendency of acute violent crises to result in the expansion of governmental powers and the concomitant contraction of individual freedoms, make it important to focus on such questions as who determines that an emergency exists? Who may exercise emergency powers when such circumstances materialize and what those powers might be? What legal, political, and social controls are there on the exercise of such powers? Who determines when and how the emergency is over and what the legal effects of such determination are? While such questions are sometimes structurally addressed by constitutional provision or legislative enactment, generally interpretation and practice devolve the questions to our courts to answer, and the substantive matter of trust in their capacity to do so is now examined.

The judiciary and crisis

In democratic states, judges are called upon to adjudicate executive resort to emergency powers. The scale of adjudication varies and is sometimes set by the resort to exceptionality itself, which may intrinsically include or exclude judicial oversight of state action. In democratic states (whether constitutionally based or not) most judges are usually engaged in a process of 'interpretative accommodation'. Here the validity of exceptional norms are generally not in question; rather interpretation of scope, meaning, and effects are the core inquiries for the courts. It is exceedingly rare for domestic courts to exercise jurisdiction or opinion on the lawfulness of the resort to exceptional powers per se.

This unwillingness to second guess the executive is manifested whether the crisis is internal or external in source. When judges confront internal or communal conflict, the matter is also regularly complicated by the targeting of courts and judges as organs of the state by violent actors, and thus, the question is quintessentially not an abstract one. As Aharon Barak, former Israeli Supreme Court President has noted, the judge is not separate from the society he inhabits and shares the fears and hopes of fellow citizens in ways that humanize the judicial process but

compellingly acknowledge the limits of its neutrality (Barak 2002). International courts have some greater structural capacity in this regard, specifically those that examine the compatibility of a state's derogation from the protection of human rights norms with their overall treaty obligations. Even here, where courts have the capacity to find the state's resort to exceptionality unlawful, such outcomes are rare.

Judges in democratic societies are also engaged in the delicate act of balancing competing interests. However, it is not clear how well the judiciary is able to perform this task. Experience across jurisdictions shows that, when faced with national crises (whether internal or external), the judiciary tends to become sensitive to the criticism that they impede the war effort. When internal strife is at issue judges are rarely in the oppositional camp, and are structural stalwarts to government precisely because their elite and political interests may be equally threatened by violent actors. Bluntly, in states of emergency, national courts assume a highly deferential attitude when called upon to review governmental actions and decisions.

The courts' abdication of responsibility generally follows two alternative judicial attitudes: courts may invoke judicial mechanisms, such as the political question doctrine, enabling them to proclaim issues pertaining to emergency powers to be non-justiciable, or, when deciding cases on their merits, they are likely to uphold the national government's position. As Justice Brennan notes: 'With prolonged exposure to the claimed threat, it is all too easy for a nation and judiciary ...to accept gullibly assertions that, in times of repose, would be subjected to the critical examination they deserve' (Brennan 1988). In the context of the United States he notes: 'There is ... a good deal to be embarrassed about, when one reflects on the shabby treatment civil liberties have received in the United States during times of perceived threats to its national security' (ibid.: 11). Another Justice of the US Supreme Court observed similarly that;

The judicial handling of wartime cases and controversies still present disappointing departures, not only from the ideal, but from the

ordinary ... Judges, too, sometimes give way to passion and partisanship. The judicial process works best in an atmosphere of calmness, patience, and deliberation. In times of anxiety, the public demands haste and a show of zeal on the part of judges, whose real duty is neutrality and detachment. (Jackson 1951)

Nor is this phenomenon unique to any one country or to any particular period in a nation's history. Evaluating the performance of domestic courts during the First World War, George Bernard Shaw was paraphrased as saying that, 'during the war the courts in France, bleeding under German guns, were very severe; the courts in England, hearing but the echoes of those guns, were grossly unjust; but the courts in the United States, knowing naught save censured news of those guns, were stark, staring, raving mad' (Starr 1920)

Indeed, the criticism leveled against domestic courts has led some scholars to argue that international or regional courts, which enjoy detachment and independence from the immediate effects of national emergencies, are better situated to monitor and supervise the exercise of emergency powers by national governments. Yet, as highlighted above, this conjecture is not borne out in practice.

One might briefly conclude therefore that courts perform badly in the context of crisis. But this position short-cuts reflection on important aspects of the value that judicial interface with crisis may bring. Thus, we need to reflect on what the absence of any judicial role would produce in state responses to crisis. What this reflection may offer is a paradox: while the role of the courts is substantially compromised in times of crisis, their presence offers (and sometimes realizes) mediation, remediation, and the (not insignificant) symbolic value of the judicial process at play in moments of exceptionality.

In order to oversee crisis powers effectively, courts must strike the appropriate balance between granting sufficient executive powers to combat the crisis at hand, and the need to prevent, or at least minimize, abuses of power by the government and its agents.

There are two general mechanisms of constitutional control designed to achieve an appropriate political and legal balance, namely judicial review and the separation of powers.

Some constitutional provisions provide explicitly for judicial review, not only of particular emergency measures employed by the government, but also of the declaration of emergency; examples include the constitutions of South Africa and the Philippines. Few others limit explicitly, or outright prevent, judicial review over the declaration of a state of emergency or of legislative emergency measures. Most constitutions are silent on this matter.

Practice shows that domestic courts tend to support the government's position particularly in respect of the validity of emergency powers *per se*. These judicial tendencies become even more pronounced when courts deal with cases in the intensity of battle (*durante bello*) as opposed to deciding them when the crisis is over. This intensity is compounded when the source of conflict is internal rather than external, giving little capacity for distance from the perceived threat of violence. This constitutional experience, which is shared by nations worldwide, would suggest that judicial review of emergency powers ought not to be feared by governments, since in effect, it confers a certain degree of legitimacy on the government's actions without exposing the executive to the substantial risk that its actions may be curbed by the judiciary.

How the courts respond to claims of necessity

The general argument for inherent powers and for what may be called constitutional necessity is, essentially, the benefit of flexibility in the face of unpredictability. The key mediators of the availability and legitimacy of necessity powers to the state are the courts. Inherent powers invoke the spectre of abuse and the concern about the ability to limit governmental powers in times of emergency. For example, the Truman administration argued in court that the executive had unlimited power in time of emergency, and that the executive determined the emergencies without the courts having the authority

to review whether they in fact existed. Justice Jackson rejected these assertions of power in no uncertain terms:

[E]mergency powers are consistent with free government only when their control is lodged elsewhere than in the executive who exercises them. That is the safeguard that would be nullified by our adoption of the 'inherent powers' formula ...Such power either has no beginning or it has no end. If it exists, it need submit to no legal restraint. I am not alarmed that it would plunge us straightway into dictatorship, but it is at least a step in that wrong direction. (Youngstown 1952)

Justice Jackson then continued to argue that the American Constitution did not reflect the scope of the president's real power: He identified 'vast accretions' of federal power and concentration of such powers in the executive, leading him to conclude that, 'I cannot be brought to believe that this country will suffer if the Court refuses further to aggrandize the presidential office, already so potent and so relatively immune from judicial review ...' (ibid.: 654).

When faced with executive arguments of expansive and/or inherent powers, courts in democratic states have some significant artillery to draw upon. These arguments are applicable whether the crisis is internally driven or external in nature and include:

- (1) that any executive inherent powers and appeals to necessity are subject to substantive and procedural limitations that are provided for in the Constitution (if a constitutionally based system);
- (2) that the ultimate question as to the necessity to invoke inherent powers and the content and scope of such powers once deemed to have been legally and constitutionally invoked should be left in the hands of the other branches of government, usually the courts; and
- (3) that necessity may only operate as a meta-rule of construction in limited circumstances.

In all contexts, courts must remain attuned to the danger that democratically elected governments/leaders are sometimes no less susceptible to power grabs than their authoritarian counterparts.

Famously, in a 1977 interview with David Frost, former President Nixon had this to say:

Frost: So what, in a sense, you're saying is that there are certain situations ... where the president can decide that it's in the best interests of the nation or something, and do something illegal.

Nixon: Well, when the president does it, that means that it is not illegal.

Frost: By definition.

Nixon: Exactly, exactly. If the president, for example, approves something because of the national security, or in this case because of a threat to internal peace and order of significant magnitude, then the president's decision in that instance is one that enables those who carry it out, to carry it out without violating a law... (New York Times 1977)

More contemporary examples illustrate the role that courts can play in checking and balancing the executive's assertions of emergency powers. In the words of Justice O'Connor in *Hamdi v. Rumsfeld*: '[A] state of war is not a blank check for the president when it comes to the rights of the nation's citizens ... in times of conflict [the Constitution] most assuredly envisions a role for all three branches when individual liberties are at stake'. Yet despite such strong judicial statements, this argument generally runs into difficulties, because as a matter of practice neither domestic courts nor any legislature perform their checking and monitoring task particularly well when claims of necessity are made by the executive branch of government during a period of crisis and emergency, whether internal or external in nature.

Executives and the courts

If the courts prove less than robust in times of crisis it is not clear that other institutions fare better, or

even as well. No less problematic are the checks by the legislative branch of the executive in times of emergency. Most constitutional arrangements provide for such checks through the required involvement of the legislature in the processes of declaring and terminating an emergency, and the necessity of obtaining legislative approval of executive emergency acts for these to remain in force. This is added to the ordinary methods by which legislatures exercise control and supervision over the government, such as approving appropriations, legislative inquiries, hearings and questioning, special legislative committees, and no-confidence votes.

Once again, experience demonstrates that legislatures tend to abdicate responsibility in times of emergency. Several reasons may account for this. Periods of emergency are often characterized by an absence of internal institutional conflict as it is considered antithetical to the maintenance or survival of the relevant social system. Indeed, the more acute the particular emergency, the less likely it is that any one will attempt to control the actions of the executive. James Madison already noted that constitutions originated in the midst of great danger that led, among other things, to 'an enthusiastic confidence of the people in their patriotic leaders, which stifled the ordinary diversity of opinions on great national questions' (Rossiter 1961: No. 49, 315).

This consensus-generating effect of emergencies is particularly significant as it undercuts, at least temporarily, the 'ambition to counteract ambition' rationale of the American (and other) systems of checks and balances, namely the notion that to resist gradual concentration of power in one branch of government, a system must be devised so as to give 'those who administer each department the necessary constitutional means and personal motives to resist encroachments of the others' (ibid.: No. 51, 319). Moreover, it is likely that the emotional effects of emergencies (such as fear or rage) and the desire to appear patriotic to voters will lead legislators to support vesting in the government broad and expansive authorizations and powers and to do so without delay.

Conceding the flaws of the legislative branch I return to a re-evaluation of the role of the courts; specifically, some important affirmative aspects to judicial oversight and presence during crisis. Firstly, the symbolic capacity of courts to adjudicate both the validity of resort to crisis powers as well as the legitimacy of the power exercised in particular circumstances carries weight, and serves as a brake on the route to exceptionality. This is what David Kretzmer has described as the phenomenon of operating within the 'shadow' of the court, whereby issues are preempted and may not reach the courts for adjudication because state agents modify their actions in advance, wary of incurring the costs and risks of judicial review and admonishment (Kretzmer 2002). Secondly, courts occasionally deliver outcomes that challenge state overreach in real time and with respect to real cases. These practical results can produce systematic change to state policy, and/or force a re-think on the scope and extent of emergency power reach. Thirdly, democratic states generally retain the right of access to justice throughout the promulgation of emergency powers, and such access places its own positive institutional stresses on courts to be seen (and to be) responsive to egregious violations of human rights predicated on exceptional powers. Finally, we should not underestimate the assertive capacity of the rule of law itself in democratic states as manifested institutionally through the courts. Notwithstanding the negative force exerted on rules in times of crisis, there is a certain robustness that also manifests itself in response to exigency. The timing of such a response is variable and in part driven by the vagaries of the particular state and the specific circumstances. Nonetheless, there is an unpredictable tipping point for the democratic state which seeks to augment its powers in the context of crisis, one facet of which may ultimately be manifested as an unwillingness by the courts to credit or legitimize state action. The legitimacy gap which results is generally fairly unpalatable for democratic states.

Communal strife and the robustness of the courts

As noted consistently above, communal strife poses specific problems of response for states. There is no one model of communal strife, and causality for

internal politically motivated violence is highly variable. Nonetheless across multiple jurisdictions state responses tend to manifest similarities.

Firstly, communal strife has a high correlation with ethnically and religiously divided societies, and/or societies in which sizeable outsider minorities can be identified. Here the evident danger of crisis powers is that they are perceived and experienced as unfairly targeting particular groups on the basis of their defining social and cultural features (Ni Aolain 2002: 17–71). The results are further alienation from the state and a risk that state repression operates only to cement and augment mobilization by non-state actors. Secondly, communal strife involving violent non-state actors raises critical questions about the legal status of the conflict in play. States have historically sought to eschew the application of international law and explicitly ouster international humanitarian law from internal conflicts. They generally argue that the threshold of violence falls below the stated requirements for activating international humanitarian law (the legal regime regulating conflicts for states) (ibid.: 218–47).

Gamesmanship regarding the applicable legal regime serves to exacerbate the problems of oversight and accountability, and further complicates the issues of definition outlined above. A complicating feature in situations involving communal strife is the challenge posed by violent non-state actors. When emergency powers are activated in situations of external conflict (notwithstanding their potential effects on selected domestic communities) there are broadly agreed frameworks of negotiation and a degree of externality to the legal effects, which may have a dampening effect on the most destructive effects of the emergency legal regime. But no such distancing is present in the domestic context. The most harmful effect of this lack of separation involves the radicalization of the internal legal and political landscape on all sides. Allied with the uncertainty or unwillingness to apply international law, in such contexts one of the primary tools for state management of conflict are the courts, and it is not always evident that they manifest independence and neutrality when thus galvanized.

Conclusion

Violent crises pose the greatest and most sustained danger to constitutional freedoms and principles. In such times, the temptation to disregard constitutional freedoms is at its zenith, while the effectiveness of traditional checks and balances is at its nadir. In times of crisis, it is often argued, legal niceties may be cast aside as luxuries to be enjoyed only in times of peace and tranquility. Those who advocate civil rights and liberties are often dismissed for having too idealistic a view of the world. At the same time, a commitment to preserving and maintaining rights, freedoms, and liberties must be reconciled with the caution against turning the Constitution into a suicide pact. As Justice Robert Jackson wrote more than fifty years ago:

Temperate and thoughtful people find difficulties in such conflicts which only partisans find no trouble in deciding wholly one way or the other. It is easy, by giving way to the passion, intolerance and suspicions of wartime, to reduce our liberties to a shadow, often in answer to exaggerated claims of security. Also, it is easy, by contemptuously ignoring the reasonable anxieties of wartime as mere 'hysteria', to set the stage for by-passing courts which the public thinks have become too naïve, too dilatory and too sympathetic with their enemies and betrayers ...if the people come deeply to feel that civil rights are being successfully turned against their institutions by their enemies, they will react by becoming enemies of civil rights. (Jackson 1951: 116)

Thus, there exists a tension between democratic values and responses to violent emergencies. The courts are at the front line of the confrontation. Democratic nations faced with serious crisis by way of terrorist threats or other fundamental political challenges must maintain and protect life, liberty, and the unity of society. At the same time, acute crises directly challenge the most fundamental concepts of constitutional democracy.

Two seemingly antithetical vectors are in opposition. The existence of restrictions and limitations on governmental powers is a fundamental attribute of democratic regimes. The ideals of democracy, individual rights, legitimacy, accountability, and the

rule of law suggest that even in times of acute danger, government is limited, both formally and substantively, in the range of activities that it may pursue and powers that it may exercise to protect the state.

However, grave violent emergencies challenge this organizing principle. In extreme cases, the reason of state and what Bruce Ackerman calls 'the existential rationale' may call for the exercise of unfettered discretion and practically unlimited powers by the government in order to protect the nation, which seems to fundamentally contradict the values and principles of the democratic project (Ackerman 2004: 1029). The question then arises to what extent, if any, violations of fundamental democratic values can be justified in the name of the survival of the democratic, constitutional order itself, and if they can be justified, to what extent a democratic, constitutional government can defend the state without transforming itself into an authoritarian regime. By virtue of the centrality of the courts themselves to the definition of what constitutes the 'democratic', courts will always be involved in this question. Moreover, courts have the difficult task of discerning whether the form in which the challenge is perceived is itself the appropriate frame of reference to use. Without a commitment to this task and consistent judicial presence we risk compromise on the depth and success of the democratic project itself.

Court success in maintaining a sphere of influence, as well as a commitment to preserving an independent role for the judiciary in mediating and reviewing the review to exceptionality will never be perfect. It may, as this policy brief reveals, fail across multiple indicators. Nonetheless, there is a more subdued story of influence and trust. It emerges in the unpredictable willingness to confront the executive, in the capacity of legal process to offer remedy, and in the immeasurable effect of working under the shadows of the court for the decision-makers who may appear before them. It is in these more subdued spaces that we should measure the successes and failures of our courts, and urge their continued commitment to the politics of presence in times of crisis.

References

- Ackerman, B. (2004) 'The Emergency Constitution' *The Yale Law Journal*, 113: 1029.
- Barak, A. (2002) 'Foreword: A Judge on Judging: The Role of a Supreme Court in a Democracy', *Harvard Law Review*, 116: 16.
- Brennan, W. J. Jr. (1988) 'The Quest To Develop a Jurisprudence of Civil Liberties in Times of Security Crises', *Israel Yearbook on Human Rights*, 18(11): 20.
- Convention for the Protection of Human Rights and Fundamental Freedoms, 4 November 1950, 213 U.N.T.S. 221 (entered into force Sept. 3, 1953), art. 15.
- Jackson, R. H. (1951) 'Wartime Security and Liberty Under Law', *Buffalo Law Review*, 1(103): 112.
- Jackson, R. H. (1951) 'Wartime Security and Liberty Under Law', *Buffalo Law Review*, 1(103).
- Kretzmer, D. (2002) *The Justice of Occupation*. New York: SUNY Press.
- New York Times* (1977) 'Excerpts from Interview with Nixon about Domestic Effects of Indochina War', *New York Times*, 20 May 1977, p. A16.
- Ní Aoláin, F. (2000) *The Politics of Force Conflict Management and State Violence In Northern Ireland*. Belfast: The Blackstaff Press.
- Rossiter, C. (ed.) (1961) *The Federalist Papers*. New York: New American Library (James Madison).
- Cases cited*
- Haig v. Agee*, 453 U.S. 280 at 309–10 (1981).
- Hamdi v. Rumsfeld*, 542 U.S. 507 at 536 (O'Connor, J.).
- Kennedy v. Mendoza-Martinez*, 372 U.S. 144 at 160 (1963).
- Ex parte Starr*, 263 F. 145, 147 (D. Mont. 1920).
- Terminiello v. Chicago*, 337 U.S. 1 at 37 (1949) (Jackson, J., dissenting).
- Youngstown*, 343 U.S. 579 at 652–3 (1952) (Jackson, J., concurring).

The Foundation

The mission of the Foundation is to study, reflect on, and promote an understanding of the role that law plays in society. This is achieved by identifying and analysing issues of contemporary interest and importance. In doing so, it draws on the work of scholars and researchers, and aims to make its work easily accessible to practitioners and professionals, whether in government, business, or the law.

Courts and the Making of Public Policy

In the last fifty years, courts have emerged as key participants in the public policymaking process, exercising discretion to make decisions which have far-reaching consequences in terms of the distribution of benefits and burdens within society. The *Courts and the Making of Public Policy* programme seeks to provide a critical assessment of the role of courts in policymaking from both empirical and theoretical perspectives, assessing their level of influence and scrutinizing the efficacy and the legitimacy of their involvement. The programme considers a range of issues within this context, including the relationship between courts, legislatures, and executives; how judicial policymaking fits within a democratic society; what training and qualifications judges have for policy decisions; and how suitable the judicial forum is for handling the information that is needed for informed policy choices.

Fionnuala Ní Aoláin is the Dorsey & Whitney Chair in Law at the University of Minnesota Law School and Professor of Law and Director of the Transitional Justice Institute at the University of Ulster in Northern Ireland. She holds a Ph.D. from the Queen's University of Belfast Northern Ireland and an LL.M. from Columbia Law School. Her research interests are in the areas of international human rights law, national security law, transitional justice and feminist theory. Her most recent book (with Professor Oren Gross) is *Law in Times of Crisis: Emergency Powers in Theory and Practice* (Cambridge University Press, 2006). It was awarded the ASIL Certificate of Merit for creative scholarship in 2007.

For further information please visit
our website at www.fljs.org
or contact us at:

The Foundation for **Law, Justice and Society**

Wolfson College
Linton Road
Oxford OX2 6UD
T · +44 (0)1865 284433
F · +44 (0)1865 284434
E · info@fljs.org
W · www.fljs.org