

LIBERALIZING PAROLE AND FURLOUGH POLICY: HUMANIZING THE PRISON SYSTEM

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Abstract

Parole and furlough is the kind of temporary release of a prisoner from jail for fixed period to meet some contingencies or certain situations. Grant of Parole and Furlough is nothing but the effort to humanize prison system. Resorting to parole and furlough system is moving towards the concept of reformation apart from the traditional theories of punishment viz. deterrent, preventive and retribution. One of the most celebrated facets of reformation theory is that it allowed mixing of prisoners with society temporarily while undergoing punishment by using the non-institutional methods like releasing prisoner on parole and furlough. Main purpose of such provisions is to afford to them an opportunity to solve their personal and family problems and to enable them to maintain their links with society. However, while exercising the discretion in granting parole and furlough the Courts should not be too lenient, as offenders who have been put back on the street after convictions commit great numbers of crimes. The opportunity of parole and furlough may be afforded on their maintaining a consistent good conduct during incarceration and on their showing a tendency to reform themselves to become good citizens.

While releasing on parole there is necessity to state the reasons while the releasing on furlough is the right of prisoners, which can be picked from the relevant provisions of Jail Manuals of State. Furlough is allowed periodically irrespective of any particular reason merely with a view to enable the prisoner to have family association, family and social ties and to avoid ill effect of the continuous prison life. Similarly, the period, which is spent on furlough, is treated as a period spent in the prison and counted for the purpose of remission of sentence. Unlike to furlough, the period, which is spent on parole, is not counted as remission of sentence.

Key words: Parole, Furlough, Prisoner, Jail, Court, Jail Manual

Different concepts such as parole, furlough, ticket of leave, home leave, etc., are used in different States to denote grant of leave or emergency release to a prisoner from prison. The terminology used is not uniform and is thus confusing. There is also no uniformity with regard to either the grounds on which leave is sanctioned or the level of authority empowered to sanction it. There is also a lot of diversity in the procedure for grant of leave. The scales at which these leaves are granted also differ from State to State; for example in some States parole is granted for a period extending up to 15 days while in other States it is restricted to 10 days only¹.

¹ *The Report of the All India Committee on Jail Reforms, 1980-83 (Volume-I), Para 20. 8 in Chapter XX dealing with System of Remission, Leave and Premature Release.*

The Jail Administration is using various tools and techniques to lessen its burden within the prison. Releasing prisoners on **Parole and Furlough** are most important tools used by the prison administration for reducing pressure on prison. However, Parole is not a method of relieving pressure of the prison population. It is the final step in the adjustment of the incarcerated offender to free society. It is part and parcel of a method of treatment which begins with incarceration in an institution. These treatment programs aimed to assist the prisoner in readjusting himself to a normal free in the community during sentence as well after serving the sentence.

Parole and furlough to inmates are progressive measures of correctional services. The release of a prisoner on parole not only saves him from the evils of incarceration but also enables him to maintain social relations with his family and the community. It also enables him to maintain social relations with his family and the community. It also helps him maintain and develop a sense of self-confidence. Continued contacts with family and the community sustain in him a hope for life. The release of prisoner on furlough motivates him to maintain good conduct and remain disciplined in the prison. The provisions relating to release of the prisoner on parole and furlough should be liberalized to help a prisoner maintain a harmonious relationship with his family and the society and to be of good conduct during the period of incarceration. The privilege of release on parole and furlough should, of course, be allowed to selective prisoners based on well-defined norms of eligibility and propriety.²

Parole:

Parole means temporary release of a prisoner for short period so that he may maintain social relations with his family and the community in order to fulfill his familial and social obligations and responsibilities. It is an opportunity for a prisoner to maintain regular contact with outside world so that he may keep himself updated with the latest developments in the society. It is however clarified that the period spent by a prisoner outside the Jail while on parole in no way is a concession so far as his sentence is concern. The prisoner has to spend extra time in prison for the period spent by him outside the Jail on parole.

Parole is the release of a inmate from imprisonment upon certain conditions to be observed by him. Prof. Gillin has defined parole as the release from a penal or reformatory institution of an offender who remains under the control of correctional authorities, in an attempt to find out whether he is fit to live in the free society without supervision. In order that parole may be effective, the treatment in the prison must prepare for it. Unless the offender has been so dealt with that his attitude toward society is changed, parole in many cases will fail. The aim of both the institution and parole is to restore the inmate to the community as a vital part of it.³

The distinguished criminologist Sutherland describes parole as the liberation of an inmate from prison or a correctional institution on conditions, with restoration of the original penalty if those conditions of liberation are violated⁴.

Parole is mere suspension of the sentence for the time being keeping the quantum of sentence intact. Release on parole is designed to afford some relief to the prisoners in certain exigencies. A prisoner may be released on parole for such period as the Competent Authority, in its discretion may

² *Model Prison Manual, 2016, Chapter XIX, Para. 19.01*

³ *John Lewis Gillin, Criminology and Penology, Chapter XXXIII, 1923, p. 564, Appleton-Century-Crofts, Inc., New York*

⁴ *Sutherland and Cressy, Principles of Criminology, 6th Edn., p. 575*

order, in case of serious illness, or death of any member of the prisoner's family or of his nearest relatives or for any other sufficient cause. The period spent on parole shall not count as remission of the sentence⁵.

Thus, the essence of parole is release from prison before completion of sentence on the condition that the prisoners abide by certain rules during balance of sentence. The release of a prisoner from imprisonment before the full sentence has been served, Parole is granted for good behaviour on the condition that, parolee regularly reports to a supervising officer for a specified period.

Parole may be of the following two types, depending upon the purpose behind it-

1. **Emergency parole under police protection:** To cater to the familial and social responsibilities of emergent nature like death/serious illness/marriage of a family member or other close relative.

2. **Regular Parole:** To take care of the familial and social obligations and responsibilities of regular nature as well as for the psychological and other needs of the prisoner to maintain contact with the outside world like house repair, admission of children to school/college, delivery of wife, sowing and harvesting of crops, etc.⁶

Generally, Emergency Parole may be granted to the convict by the competent authorities as well as to the under trial prisoners by the trial court concerned, under adequate police protection, for a period extending up to 48 hours, in the following eventualities:

- i. Death or serious illness of father/ mother/ brother/s /sister/s/ spouse/ children.
- ii. Marriage of brother/s/ sister/s/ children/ children of sister/s.

Convicts are entitled to emergency parole, regular parole and furlough, subject to the fulfillment of eligibility criteria and other conditions prescribed in this regard by the State Government under any Jail/Prison Manual.

Furlough:

Mitra's Dictionary defines Furlough, as it is a conditional release of a prisoner who is sentenced to long-term imprisonment. Oxford Dictionary defines it as a temporary release of convicts from prison.

Furlough means release of a prisoner for a short period of time after a gap of certain qualified number of years of incarceration by way of motivation for him maintaining good conduct and remaining disciplined in the prison. This is purely an incentive for good conduct in the prison. Therefore, the period spent by the prisoner outside the prison on furlough shall be counted towards his sentence.⁷

In Dictionary of American Penology, by Vergil L. Williams 'furlough' is described as under –

“Furloughs are variously known as temporary leaves, home visits, or temporary community release. For decades, prisons have occasionally granted short furloughs to inmates who were suddenly faced with a severe family crisis such as a death or grave illness in the immediate family. Furloughs of that type are treated as special circumstances, and

⁵ Vide the Maharashtra Prison Manual, Maharashtra Prisons (Bombay Furlough and Parole) Rules, 1959 under Rules 3 and 4

⁶ Model Prison Manual, 2016, Chapter XIX, Para. 19.03

⁷ Model Prison Manual, 2016, Chapter XIX, Para. 19.04

often the inmate must be accompanied by an officer as part of the terms of the temporary release”.

In the article ‘Furlough Programs and Conjugal Visiting in Adult Correctional Institutions’ by Carson W. Markley in Volume “Federal Probation”, it is mentioned that:

“The term ‘furlough’ is frequently confused with special leave, which most adult institutions have long been willing to grant under extenuating circumstances, such as family crises. A prisoner on special leave customarily travels under escort, while on furlough he is on his own”.

‘Furlough’ according to Black’s Law Dictionary⁸ means-

“a leave of absence, e. g. a temporary leave of absence to one in the armed service of the country, an employee placed in a temporary status without duties and pay because of lack of work or funds or for other non-disciplinary reasons”.

‘Furlough’ and ‘parole’ are two distinct terms now being used in the Jail Manuals or laws relating to temporary release of prisoners. These two terms have acquired different meanings in the statute with varied results. Dictionary meanings, therefore, are not quite helpful. As unlike to parole, the furlough period shall be counted as a remission of sentence.

In the Statement of Objects and Reasons for Bombay (Prisons Amendment) Act No. 27 of 1953, the Jail Reforms Committee had recommended and the Government accepted the recommendation that:

“there should be the system of release of prisoners on furlough under which well behaved prisoners of certain categories should, as a matter of right have a spell of freedom occasionally after they undergo a specified period of imprisonment, so that they may maintain contact with their near relatives and friends and may not feel uprooted from the society.

The furlough means leave of absence whereas parole means a conditional and revocable release of prisoner serving unexpired sentence⁹. It is to be noted that furlough is a matter of right, parole is not so. Furlough is to be granted periodically under the rules provided for irrespective of any particular reason merely with a view to enable the prisoner to have family and social ties and to avoid ill effects of continuous prison life, and the period of furlough is treated as remission of sentence, since furlough is to be granted for no particular reason, it can be denied in the interest of the Society, whereas parole is to be granted only on a sufficient cause such as cases of severe illness or death of any member of prisoner’s family or of his nearest relative or for other sufficient cause.

It is thus, well settled that grant of furlough is a substantial legal right, which a prisoner is entitled on fulfillment of the conditions, provided in appropriate rules.

The scheme of grant of furlough is that after a convict has been sentenced, on completion of a particular period of imprisonment undergone, he should be provided to have a social inter-action with an intention that he forgets bitterness and sufferings for a while¹⁰.

⁸ 6th Edition

⁹ *Subhash Hiralal Bhosale Vs. The State of Maharashtra and others, Cri. WP No. 4187-12 decided on 4th Sept., 2013 by Bombay High Court at Bombay*

¹⁰ *Under the Maharashtra Prison Manual, the furlough shall not be granted to the following categories of prisoners:*

- *Habitual prisoners*
 - *Prisoners convicted of offences under Ss. 392 to 402 (both inclusive) of Indian Penal Code.*
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Therefore, parole is of a matter of right and only when there is sufficient and serious cause the society and the jail administration may sometimes, have to take some risk to release the prisoner on parole, but that would be no ground for releasing the prisoner on routine furlough irrespective of his past conduct and performance.

The parole and furlough rules are part of the penal and prison system with a view to humanize the prison system. These rules enable the prisoner to obtain his release and to return to the outside world for a short prescribed period. The objects of such a release of prisoners can be read from the objects mentioned in Model Prison Manual, 2016. These objects are:

The objectives of releasing a prisoner on parole and furlough are¹¹:

1. To enable the inmate to maintain continuity with his family life and deal with familial and social matters,
2. To save him from the evil effects of continuous long prison life,
3. To enable him to maintain and develop his self-confidence,
4. To enable him to develop constructive hope and active interest in life,
5. To help him remain physiologically and psychologically healthy,
6. To enable him to overcome/recover from the stress and evil effects of incarceration, and
7. To motivate him to maintain good prison and disciplined in the prison.

Distinction between Parole and Furlough:

Both Parole and Furlough are conditional release. Key-point of distinction between Parole and Furlough is as follows- (the distinction may vary to some extent as per the provisions contained in different Jail Manuals)

1. Parole can be granted in case of short-term imprisonment where as in Furlough it is granted in case of long-term imprisonment.
2. For parole specific reason is required where as furlough is meant for breaking the monotony of imprisonment.
3. The term of imprisonment is not included in the computation of the term of parole, where as it is vice-versa in furlough.

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- *Prisoners convicted of offences under the Bombay Prohibition Act, 1949.*
 - *Prisoners whose release is not recommended in Greater Bombay by the Commissioner of Police and elsewhere, by the District Magistrate on the ground of public peace and tranquility.*
 - *Prisoners who, in the opinion of the Superintendent prison show a tendency towards crime.*
 - *Prisoners whose conduct is , in the opinion of the Superintendent of the Prison, not satisfactory enough.*
 - *Prisoners confined in the Ratnagiri Special Prison, (other than prisoners transferred to that prison for Jail services).*
 - *Prisoners convicted of offences of violence against person or property committed for political motives, unless the prior consent of the State Government to such release is obtained.*
 - *A prisoner or class of prisoners in whose case the State Government has directed that the prisoner shall not be released or that the case should be referred to it for orders.*
 - *Prisoners who have at any time escaped or attempted to escape from lawful custody or have defaulted in any way in surrendering themselves at the appropriate time after release on parole or furlough.*

¹¹ Model Prison Manual, 2016, Chapter XIX, Para. 19.02

4. Parole can be granted a number of times where as there is limitation in the case of furlough.

Since Furlough is not granted for any particular reason, it can be denied in the interest of the society.

In the case of *State of Maharashtra and others v. Suresh Pandurang Darvakar*¹², their Lordships considered the Rules under Bombay furlough and Parole Rules. Their Lordships observed in para. 5 as follows:

“The underlying object of the Rules relating to “parole” and “furlough” has been mentioned in the Report submitted by All-India Jail manual Committee and the objects mentioned in Model Prison Manual. The “furlough” and “parole” have two different purposes. It is not necessary to state the reasons while releasing the prisoner on furlough, but in case of parole reasons are to be indicated in terms of Rule 19. However, release on furlough cannot be said to be an absolute right of the prisoner as culled out from Rule 17. It is subject to the conditions mentioned in Rules 4 (4) and 6. Furlough is allowed periodically under Rule 3 irrespective of any particular reason merely with a view to enable the prisoner to have family association, family and social ties and to avoid ill effect of continuous prison life. Period of furlough is treated as a period spent in the prison. However, Rule 20 shows that period spent on parole is not to be counted as remission of sentence. Since the furlough is granted for no particular reason, it can be denied in the interest of society; whereas parole is to be granted only on sufficient cause being shown”.

The Division Bench of Bombay High Court in case of *Pralhad Dnyanoba Gajbhiye v. The State of Maharashtra and another*,¹³ has considered the provisions of Prisons (Bombay Furlough and Parole) Rules, 1959 under Rules 3 and 4 and Prisons Act, 1894 Sections 59 (9) and (29). The Court observed that the furlough and parole have two different purposes. Furlough is a matter of right whereas parole cannot be claimed as a matter of right. Furlough is to be granted periodically under Rule 3 of the Furlough Rules and the principal object of grant of furlough is to enable the prisoner to have family association and to avoid ill effect of continuous prison life. While undergoing sentence, in according with the Furlough Rules, a prisoner is accorded social inter-action, man being a social animal. Social life is brought into existence periodically for a prisoner by providing furlough. Furlough is not provided or granted for any particular reason and if he is not illegible under Rule 4 of the furlough Rules, furlough has to be granted and even if a disqualification is there under Rule 4, still it is not necessary that grant of furlough shall be refused. Their Lordships were considering whether detention during trial, which was actual imprisonment, can be considered for counting furlough.

Procedure for Grant of Parole and Furlough:

Under certain special circumstance, Parole and Furlough may be granted to the inmate. There is no uniformity in States Rules under respective Jail Manuals regarding granting of Parole and Furlough. As prison reforms is a State subject as per the Constitution of India, considering its importance, the Government of India has over the years been providing the State Governments all requisite support and assistance to modernize prisons across the country and facilitate the task of rehabilitation and reformation of prisoners. The Model Prison Manual is a step in this direction and

¹² (2006) 4 SCC 776

¹³ 1996 (1) Bom. C. R. 522

strives to serve as a benchmark that all States should emulate and seek guidance from. Government of India has approved New Prison Manual, 2016, which aims at bringing in basic uniformity in laws, rules and regulations governing prison administration and management of prisoners all over the country. This is also in consonance with the directions of Supreme Court in landmark case of *Ramamurthy v. State of Karnataka*¹⁴.

A prisoner desiring to avail parole or furlough will submit his application in the prescribed form to the Superintendent of the Prison. The Superintendent will examine each case carefully with regard to the eligibility for leave with particular reference to conduct, work, attitude towards family and community, and the manner in which the previous period of leave, if any, was utilized. He will then forward the application to the concerned competent authority authorized to sanction parole/furlough with his recommendation.

The opinion of the district authorities (such as Superintendent of Police, District Magistrate) should be obtained every time a prisoner is released on parole or furlough.

The competent authority authorized to sanction parole/furlough may make an order for the release of a prisoner subject to the following conditions:

- i. That the prisoner shall furnish cash security for the amount fixed by the competent authority and execute a personal recognizance bond, or execute a bond with one or more sureties according to the directions of the competent authority,
- ii. That the prisoner shall reside at the place designated by the competent authority and will not go beyond the specified limits,
- iii. That the prisoner will keep good behavior and will not commit any offence during the period of release,
- iv. That the prisoner will report to the Probation Officer, if any, of the area of his stay during the period of release,
- v. That the prisoner will neither associate with bad characters nor lead a dissolute life,
- vi. That the prisoner will be liable to be recalled immediately to prison in case he violates any of the conditions,
- vii. That the prisoner will surrender himself to the Superintendent of the Prison on expiry of the release period as granted, or on recall.

In *Sharad Keshav Mehta v. State Of Maharashtra & Ors.*¹⁵, the petitioner, Sharad Mehta, was sentenced to life imprisonment for murder in October 1983. In October 1985 he made an application for release on furlough, however the application was rejected. He re-applied for release in March 1986 and April 1986 but was again denied. He challenged the denial of furlough in the Bombay High Court arguing that the denial was in contravention of the rules framed under the Maharashtra Prison Manual.

Disagreeing with the contentions made by the State Government, the Court observed that, "It is not open to the Home Department of the State Government to prescribe rules giving facility of release of the prisoner on furlough by one hand and then providing that the prisoner has no legal right to be released on furlough." The Court also highlighted the difference between parole and furlough. Parole is granted for certain emergency and the release on parole is a discretionary right. However, release on furlough is a substantial right and accrues to a prisoner on compliance with

¹⁴ AIR 1997 SC 1739

¹⁵ Criminal WP No 376 of 1987

certain requirements. The idea of granting furlough to a prisoner is that the prisoner should have an opportunity to come out and mix with the society and the prisoner should not be continuously kept in jail for a considerable long period.

The High Court laid down the following guidelines in this regard-

- i. The right to be released on furlough is a substantial and legal right conferred on the prisoner.
- ii. A prisoner can claim as of right to be released on furlough after having complied with the requirements of the rules framed for release of prisoner on furlough.
- iii. The Commissioner of Police must apply his mind to the facts of each case and should not as a formality submit a report denying the substantial and legal right of the prisoner.

Unless the Commissioner of Police has material from which a reasonable inference can be drawn, the right to release on furlough cannot be deprived by resort to any exceptions to the rule.

In *Poonam Lata v. M. L. Wadhawan*¹⁶, Supreme Court was considering the nature and scope of parole in a case of preventive detention. It said:

“There is no denying of the fact that preventive detention is not punishment and the concept of serving out a sentence would not legitimately be within the purview of preventive detention. The grant of parole is essentially an executive function, instances of release of detainees on parole were literally unknown until this Court, and some of the High Courts in India in recent years made orders of release on parole on humanitarian considerations. Historically, ‘parole’ is a concept known to military law and denotes release of a prisoner of war on promise to return. Parole has become an integral part of the English and American systems of criminal justice intertwined with the evolution of changing attitudes of the society towards crime and criminals. Because of the introduction of parole into the penal system, all fixed-term sentences of imprisonment of above 18 months are subject to release on license, that is, parole after a third of the period of sentence has been served. In those countries, parole is taken as an act of grace and not as a matter of right and the convict prisoner may be released on condition that he abides by the promise.

It is a provisional release from confinement but is deemed to be a part of the imprisonment. Release on parole is a wing of the reformatory process and is expected to provide opportunity to the prisoner to transform himself into a useful citizen.

Parole is thus a grant of partial liberty or lessening of restrictions to a convict prisoner, but release on parole does not change the status of the prisoner. Rules are framed providing supervision by parole authorities of the convicts released on parole and in case of failure to perform the promise, the convict released on parole is directed to surrender to custody. It follows from these authorities that parole is the release of a very long-term prisoner from a penal or correctional institution after he has served a part of his sentence under the continuous custody of the State and under conditions that permit his incarceration in the event of misbehavior”.

In *Bhikhabhai Devshi v. State of Gujarat and Ors.*¹⁷, Full Bench of Gujarat High Court has laid down that the parole and furlough Rules are part of the penal and prison reform with a view to humanize the prison system. These rules enable the prisoner to obtain his release and to return to the outside world for a short prescribed period. The object of such release is to enable the inmate to maintain his continuity with his family life and deal with family matters; to save the inmate from the

¹⁶ (1987) 3 SCC 347; AIR 1987 SC 1383; 1987 Cri LJ 1130

¹⁷ 1987 Cri.LJ 1932

evil effects of continuous prison life and to enable the inmate to maintain constructive hope and active interest in life.

The Jail Reforms Committee in the Statement of Objects and Reasons for Bombay (Prisons Amendment) Act No. 27 of 1953, had recommended the release of well behaved prisoners of certain categories on furlough as of right after they undergo a specified period of imprisonment which was accepted by the Government in pursuance of which furlough system was put in the act. Accordingly, parole and furlough rules were framed. The Full Bench has observed that the object of parole and furlough rules is to be humanized penal system and to enable the prisoner to maintain the continuity with his family life and to deal with the family matters as also to save him from evil effects of continuous jail life and to enable him to gain self confidence as also to maintain constructive hopes and active interest in life.

The apex-Court in the case titled *Sunil Ful chand Shah v. Union of India and Others*¹⁸, had observed inter alia as under:-

“In this country, there are no statutory provisions dealing with the question of grant of parole. The Code of Criminal Procedure does not contain any provision for grant of parole. By administrative instructions, however, rules have been framed in various States, regulating the grant of parole. Thus, the action for grant of parole is an administrative action”.

It has been rightly observed by the Court in case titled *Sahebrao Tukaram Juware v. State of Maharashtra*¹⁹, that it is obligatory on the part of the competent authority to process the application received from the prisoner for grant of parole leave at its earliest, by following the procedure. Any unreasonable delay in passing the order would not only frustrate the object of the rule but also result in miscarriage of justice to the prisoner.

In the same case the Court held that if the application for grant of parole leave is made by the prisoners on the grounds of serious illness of his nearest relative, it is obligatory on the part of the competent authority to consider this aspect and give reasons as to the whether the ground of serious illness mentioned in the application is genuine or false and it is only thereafter it will be appropriate for the competent authority to grant or refuse the request made by the prisoner for releasing him on parole leave. The competent authority altogether ignore this aspect and if, without giving in this regard, reject the application of parole leave of the prisoner only on the ground of adverse police report, such order would result in non-application of mind and cannot be sustained.

In *A convict Prisoner in Central Prison, Thiruvananthapuram v. State of Kerala*²⁰, the Hon'ble Supreme Court observed that for years and years, prisoners do not see a child, a woman, or even animals. They lose touch with the outside world. They brood and wrap themselves in angry thoughts of fear, revenge and hatred; forget the good of the world, kindness and joy. So, our prison administration should liberalize parole to prevent pent-up (unexpressed) tension and sex perversion which are popular currently in many a penitentiary (prison, prison colony)²¹.

In *R. D. Upadhyay v. State of Andhra Pradesh*,²² it was observed by the Supreme Court that women under trial prisoners and women convict when having a child birth in prison then such a

¹⁸ 2000 (3) SCC 400

¹⁹ 2008 Cr. L. J. 134 Bom

²⁰ 1993 Cr. L. J. 3242 Ker

²¹ Also see *Maru Ram Bhiwana Ram v. State of U. P.*, AIR 1980 SC 2147

²² AIR 2006 SC 1946

prisoner has a suitable option of arrangements for temporary release or parole to be made to enable an expectant prisoner to have delivery outside prison and only in exceptional cases such a facility can be denied.

It is relevant to draw reference to a judgment of 2011, Hon'ble Rajasthan High Court (Justice Govind Mathur and Justice N. K. Jain) held that parole is human right of the prisoner. The object of parole is to bring the prisoner in mainstream. It is undivided part of civil society for rehabilitation of prisoner. The provisions of parole and furlough provide for a humanistic approach towards those lodged in jails.

Since the furlough is granted for no particular reason, it can be denied in the interest of society; whereas parole is to be granted only on sufficient cause being shown. In instances where the convicts (released on parole and furlough) do not maintain good conduct or in instances where they fail to follow the condition attached to their protocols or where they pose a threat to the peace and well being of the society, in larger public interest, the law reserves with it the right to cancel such temporary release.

Thus, the release of prisoners by granting furlough and parole is most important wing of correctional therapy. It is non-institutional treatment program. It aims at rehabilitation of prisoners by readjusting himself to free society. The wide and effective use of these reformative techniques will certainly serve many purposes including the opportunity to the prisoner for his transformation to become useful citizen, humanize penal system, maintain continuity with family life and to deal with family matters etc. These kinds of non-institutional reforms, along with other institutional reforms must infuse liberally subject to security safeguard by the prison administration and consistently strive to search for other alternatives.

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