



Greater Caribbean for Life
committed to the abolition of the death penalty



Barbados
Stakeholder Report for the United Nations Universal Periodic Review

Submitted by The Advocates for Human Rights,
a non-governmental organization in special consultative status with ECOSOC since 1996
The World Coalition Against the Death Penalty
and
The Greater Caribbean for Life

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Founded in 1983, **The Advocates for Human Rights** (The Advocates) is a volunteer-based non-governmental organization committed to the impartial promotion and protection of international human rights standards and the rule of law. The Advocates conducts a range of programs to promote human rights in the United States and around the world, including monitoring and fact finding, direct legal representation, education and training, and publication. The Advocates is the primary provider of legal services to low-income asylum seekers in the Upper Midwest region of the United States. In 1991, The Advocates adopted a formal commitment to oppose the death penalty worldwide and organized a Death Penalty Project to provide pro bono assistance on post-conviction appeals, as well as education and advocacy to end capital punishment. The Advocates currently holds a seat on the Steering Committee of the World Coalition Against the Death Penalty.

The World Coalition Against the Death Penalty, an alliance of more than 150 NGOs, bar associations, local authorities and unions, was created in Rome on May 13, 2002. The aim of the World Coalition is to strengthen the international dimension of the fight against the death penalty. Its ultimate objective is to obtain the universal abolition of the death penalty. To achieve its goal, the World Coalition advocates for a definitive end to death sentences and executions in those countries where the death penalty is in force. In some countries, it is seeking to obtain a reduction in the use of capital punishment as a first step towards abolition.

The Greater Caribbean for Life (GCL) is an independent, not-for-profit civil society organization that was established in Port of Spain, Trinidad on October 2, 2013 to unite Caribbean abolitionist organizations and individuals. The region comprises 25 countries, including 13 Caribbean islands, the Caribbean states of South America (Columbia, Venezuela, and the Guyanas), the countries of Central America and Mexico, in addition to Puerto Rico, and the US, British, Dutch and French Caribbean territories. In the struggle against the death penalty, GCL reflects the greatest respect to the right to life. GCL has members in 16 Caribbean States and territories. This initiative began on October 19, 2011, when a group of organizations and individuals from countries of the Greater Caribbean opposed to the application of capital punishment, participated in an International Conference in Madrid on the Death Penalty in the Greater Caribbean. The Conference was organized by the Community of Sant’Edigio. GCL was constituted with the purpose of campaigning for and working towards the permanent abolition of the death penalty in the Greater Caribbean; supporting Caribbean abolitionist activists and organizations in this region; and collaborating with the international abolitionist community.

EXECUTIVE SUMMARY

1. This report addresses Barbados' compliance with its international human rights obligations with respect to the death penalty. In 2019, Barbados removed the mandatory death penalty from its Constitution.¹ While Barbados has maintained a *de facto* moratorium on executions since 1984, formal abolition of the death penalty would prevent any possibility of the resumption of executions.
2. This report recommends that Barbados finalize its efforts to abolish the death penalty, commute the sentences of people currently under sentence of death, bring detention conditions into compliance with international human rights standards, and ensure the fair trial and due process rights of all persons suspected of committing crimes, including crimes that are currently capital offenses.
3. During its 2017 Universal Periodic Review, Barbados received thirty-six recommendations about the death penalty and related issues. Of these recommendations, Barbados noted thirty-five, including twenty-three recommendations related to the death penalty, thirteen related to ratification of the Second Optional Protocol to the International Covenant on Civil and Political Rights (ICCPR), and twelve recommendations related to torture. Barbados accepted only Italy's recommendation to "[s]peed-up the process to remove provisions in national law that provide for the mandatory imposition of the death penalty."²

I. IMPLEMENTATION OF INTERNATIONAL HUMAN RIGHTS OBLIGATIONS

A12 Acceptance of international norms

Status of Implementation: Not Accepted, Not Implemented

4. Barbados received thirteen recommendations to ratify the Second Optional Protocol to the ICCPR,³ all of which Barbados noted.⁴
5. Barbados also noted twelve recommendations to ratify the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and its Optional Protocol.⁵
6. Barbados has neither signed nor ratified the Second Optional Protocol⁶ nor the Convention Against Torture.⁷
7. In 2020, Barbados voted against the UN General Assembly resolution calling for a worldwide moratorium on the use of the death penalty.⁸
8. After 400 years under British rule, Barbados removed Queen Elizabeth II as head of state and became a republic in 2021. The Caribbean Court of Justice (CCJ) settles disputes between Barbados and other Caribbean Community (CARICOM) Member States, and also serves as the highest court of appeals on civil and criminal matters for the national courts of Barbados. To date, only three Caribbean states (Barbados, Belize and Guyana) have replaced the Judicial Committee of the Privy Council with the CCJ.⁹

Theme D23: Death penalty

Status of Implementation: Partially Accepted, Partially Implemented

9. Barbados received and noted twenty-three recommendations related to the death penalty.¹⁰ Of the recommendations, sixteen proposed total abolition of the death penalty.¹¹ The remaining seven proposed that Barbados impose a legal moratorium of the death penalty.¹²
10. Barbados retains the death penalty, but has not carried out executions since 1984.¹³ Article 12 of Barbados' Constitution states: "No person shall be deprived of his life intentionally save in execution of the sentence of a court in respect of a criminal offense under the law of Barbados of which he has been convicted."¹⁴ A 2002 Constitutional amendment states that the mandatory death penalty will not be imposed should it violate protection from torture under the Constitution.¹⁵ The death penalty is not an available punishment for people under the age of 18 or for pregnant women.¹⁶
11. In June of 2018, the Caribbean Court of Justice ruled that the mandatory death penalty was unconstitutional.¹⁷ The Court found that the mandatory death penalty violates the right to life and the right to be free from inhuman and degrading treatment because it does not allow courts to take mitigating factors into consideration.¹⁸ In 2019, both Houses of Parliament passed the Constitution Amendment Bill 2019 to repeal the mandatory death penalty for murder.¹⁹ Parliament also amended the Offenses Against the Person Act, establishing guidelines for resentencing individuals who are currently on death row for murder.²⁰
12. At the end of 2021, there were six people on death row.²¹ The people under sentence of death for murder are awaiting resentencing.²² It is not clear whether Barbados has implemented the resentencing guidelines under the amended Offenses Against the Person Act. In June 2022, however, The Court of Appeal vacated Jamar Dwayne Bynoe's death sentence, while upholding his conviction.²³ Bynoe had been sentenced to death by hanging in 2010 for his involvement in the murder of six women.²⁴
13. Barbados retains the death penalty for more than the most serious crimes. Under the Offenses Against the Person Act, the death penalty is an available punishment for murder,²⁵ yet it is also available for treason, terrorism—including terrorism-related offenses that do not result in death—espionage, and military crimes, all of which do not require that the accused intended to kill or that the accused's conduct resulted in death.²⁶
14. There has been a recent spike in gun violence in Barbados that has sparked a call for reinstating the mandatory death penalty.²⁷ Attorney General Dale Marshall stated, "This is not an indication that Barbados has descended into a state of chaos or outright lawlessness. We have dealt with spikes in crime before and effectively so."²⁸ Several attorneys have spoken against resumption of hangings, arguing that the poorest people who do not have access to adequate counsel will be the ones who will lose their lives.²⁹ One attorney acknowledged that "the court system will not always get it right."³⁰ Despite some opposition from the legal community, the call for the resumption of executions is concerning, particularly because several countries in the region have used public opinion as a rationale to justify retaining the death penalty.³¹

D26 Conditions of detention

15. Lengthy pre-trial detention is a problem in Barbados. As of 2021, delays of five to seven years before cases went to trial are common, and in some cases people have waited up to 10 years before trial. The Chief Justice of Barbados has confirmed that prolonged pre-trial detention is not consistent with the Constitution and has announced that he will require the Superintendent of Prisons to submit a quarterly report detailing all persons held in pre-trial detention.³²

D51 Administration of justice and fair trial

16. See paragraph 11.

II. RECOMMENDATIONS

17. The coauthors of this stakeholder report suggest the following recommendations for the Government of Barbados:
- Amend the Offenses Against the Persons Act and the Constitution to abolish the death penalty de jure.
 - Ratify the Second Optional Protocol to the ICCPR.
 - Implement the resentencing guidelines in the amended Offenses Against the Persons Act and commute the sentences of all individuals currently on death row, and until the death penalty is abolished institute a de jure moratorium on executions.
 - Ratify the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and its optional protocol.
 - Collaborate with civil society organizations to conduct a comprehensive public awareness-raising campaign to educate the public about international human rights standards as they pertain to the death penalty and about alternatives to the death penalty.
 - Provide enhanced funding and human resources to Barbados Community Legal Services³³ to ensure that defendants who have limited financial means to defend themselves are afforded complete and effective legal assistance, including well qualified legal counsel and funding for expert testimony and for carrying out an investigation to gather evidence for the defense, giving priority to any person at risk of being sentenced to death.
 - Direct law enforcement to provide indigent persons accused of a crime with timely access to counsel, prior to any interrogation, prioritizing any person suspected of having committed a capital crime.
 - Expand training for law enforcement and people working in detention facilities on the rights of people in detention to challenge the legal basis of their detention and institute procedures to ensure that they do not hinder individuals' efforts to exercise these rights.

- Step up funding for the detention facilities to ensure conditions are consistent with the Nelson Mandela Rules, with particular emphasis on water and sanitation, food and other basic necessities, and prison-based health services.³⁴
- Provide training to staff at correctional facilities about psycho-social disabilities and ensure people with such disabilities receive appropriate services and accommodations while they are detained.
- Ensure that all people in detention have access to skills training and post-release support, regardless of their sentence.
- Expand post-release support programs to include assistance for people exonerated from death row and ensure that exonerees receive remedies for their wrongful convictions and for their time on death row.

¹ Amnesty International, *Death Penalty 2019: Global Executions Fell by 5%, Hitting A 10-Year Low*, (April 20, 2020) Also available online at <https://www.amnestyusa.org/reports/death-penalty-2019/>

² Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Barbados*, (Apr. 6, 2018), U.N. Doc. A/HRC/38/12 ¶ 96.57.

³ Report of the Working Group on the Universal Periodic Review: Barbados (April 6, 2018), U.N. Doc. A/HRC/38/12. ¶ 96.3 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty, and take the necessary measures to repeal the death penalty in its legislation (Argentina); ¶ 96.28 Ratify the Optional Protocols to the Convention on the Rights of the Child, on the sale of children, child prostitution and child pornography and on the involvement of children in armed conflict; the International Convention for the Protection of All Persons from Enforced Disappearance; the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families; the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and its Optional Protocol; and the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Honduras); ¶ 96.16 Ratify the Convention against Torture and its Optional Protocol, and the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Portugal); ¶ 96.19 Consider ratifying the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Slovenia); ¶ 96.21 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty, and the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Uruguay); ¶ 96.1 Take steps towards the full abolition of the death penalty, including ratification of the Second Optional Protocol to the International Covenant on Civil and Political Rights (New Zealand); ¶ 96.2 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Ukraine); ¶ 96.4 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Belgium); ¶ 96.5 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Côte d'Ivoire); ¶ 96.6 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Georgia); ¶ 96.7 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Iceland); ¶ 96.8 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Montenegro); ¶ 96.59 Abolish the death penalty for all crimes and ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights (Germany)

⁴ Human Rights Council, *Addendum to the Report of the Working Group on the Universal Periodic Review: Barbados*, (June 14, 2018), U.N. Doc. A/HRC/38/12/Add.1.

⁵ Report of the Working Group on the Universal Periodic Review: Barbados (April 6, 2018), U.N. Doc. A/HRC/38/12. ¶ 96.20 Ratify other key international treaties, including the International Convention for the Protection of All Persons from Enforced Disappearance, the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and its Optional Protocol, and the Optional Protocols to the Convention on the Rights of the Child (Ukraine); ¶ 96.18 Accede to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families and the International Convention for the Protection of All Persons from Enforced Disappearance (Sierra Leone); ¶ 96.24 Ratify the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, as well as the International Convention for the Protection of All Persons from Enforced Disappearance (Belgium); ¶ 96.15 Consider ratifying the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (Indonesia); ¶ 96.9 Consider ratifying the International Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Brazil); ¶ 96.10 Advance towards the ratification of the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Chile); ¶ 96.11 Ratify the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Côte d'Ivoire); ¶ 96.12 Ratify the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Denmark); ¶ 96.26 Ratify the Convention against Torture and its Optional Protocol (Germany); ¶ 96.23 Consider ratifying the Convention against Torture and the Optional Protocols to the Convention on the Rights of the Child (Azerbaijan); ¶ 96.30 Continue efforts to ratify international instruments, such as the Convention against Torture and the International Convention for the Protection of All Persons from Enforced Disappearance (Morocco); ¶ 96.27 Consider ratifying the main international instruments on human rights, particularly those on children, migrants, torture and the death penalty (Haiti).

⁶ United Nations Treaty Collection, “Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty,” Accessed 4 October 2022, https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg_no=IV-12&chapter=4&clang=_en.

⁷ UN Treaty Body Database, “Ratification Status for Barbados,” Accessed 4 October 2022, https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=15&Lang=EN.

⁸ UN Digital Library, United Nations Voting Records, Also available at <https://digitallibrary.un.org/record/3894866?ln=en>.

⁹ International Resource Justice Center, *Caribbean Court of Justice* (Updated September 19, 2022) Also available online at <https://ijrcenter.org/regional-communities/caribbean-court-of-justice/>

¹⁰ Report of the Working Group on the Universal Periodic Review: Barbados (April 6, 2018), U.N. Doc. A/HRC/38/12.

¹¹ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Barbados* (April 6, 2018), U.N. Doc. A/HRC/38/12. ¶ 96.3 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty, and take the necessary measures to repeal the death penalty in its legislation (Argentina); ¶ 96.28 Ratify the Optional Protocols to the Convention on the Rights of the Child, on the sale of children, child prostitution and child pornography and on the involvement of children in armed conflict; the International Convention for the Protection of All Persons from Enforced Disappearance; the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families; the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and its Optional Protocol; and the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Honduras); ¶ 96.16 Ratify the Convention against Torture and its Optional Protocol, and the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Portugal); ¶ 96.19 Consider ratifying the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Slovenia); ¶ 96.21 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty, and the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Uruguay); ¶ 96.1 Take steps towards the full abolition of the death penalty, including ratification of the Second Optional Protocol to the International Covenant on Civil and Political Rights (New Zealand); ¶ 96.2 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Ukraine); ¶

96.4 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Belgium); ¶ 96.5 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Côte d'Ivoire); ¶ 96.6 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Georgia); ¶ 96.7 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Iceland); ¶ 96.8 Ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty (Montenegro); ¶ 96.59 Abolish the death penalty for all crimes and ratify the Second Optional Protocol to the International Covenant on Civil and Political Rights (Germany); ¶ 96.56 Enact legislation to abolish the mandatory death penalty, in line with previously accepted recommendations, and commute the sentences of all persons currently on death row to life imprisonment (Ireland); ¶ 96.58 Permanently abolish the death penalty in continuation of Barbados de facto moratorium (France); ¶ 96.55 Consider abolishing the death penalty (Mozambique).

¹² Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Barbados* (April 6, 2018), U.N. Doc. A/HRC/38/12. ¶ 96.62 Promote a national debate on capital punishment and consider the adoption of a de jure moratorium on executions with a view to abolishing the death penalty (Italy); ¶ 96.55 ¶ 96.60 Consider establishing an official moratorium on the death penalty, with a view to totally abolishing it, while noting that the country has maintained a de facto moratorium for more than 30 years (Namibia); ¶ 96.61 Impose a moratorium on the mandatory death penalty (Timor-Leste); ¶ 96.63 Consider applying a moratorium on the death penalty (Angola); ¶ 96.64 Establish a formal moratorium on the death penalty, as a step towards the complete abolition of this practice (Australia); ¶ 96.65 Consider the abolition of the death penalty, while adopting a de facto moratorium on the death penalty (Chile); ¶ 96.66 Establish a mandatory moratorium on the use of the death penalty in conformity with the international standards on the matter (Mexico).

¹³ Cornell Center on the Death Penalty Worldwide, “Barbados,” Accessed 4 October, 2022. Available at <https://deathpenaltyworldwide.org/database/#/results/country?id=7>.

¹⁴ THE CONSTITUTION OF BARBADOS Art. 12.

¹⁵ Cornell Center on the Death Penalty Worldwide, “Barbados,” Accessed 4 October, 2022. Available at <https://deathpenaltyworldwide.org/database/#/results/country?id=7>.

¹⁶ Cornell Center on the Death Penalty Worldwide, “Barbados,” Accessed 4 October, 2022. Available at <https://deathpenaltyworldwide.org/database/#/results/country?id=7>.

¹⁷ Press Release, The World Coalition Against the Death Penalty, Caribbean Court of Justice strikes down mandatory death penalty in Barbados, (June 18, 2018). Available online at <https://worldcoalition.org/2018/06/27/caribbean-court-of-justice-strikes-down-mandatory-death-penalty-in-barbados/>.

¹⁸ Press Release, The World Coalition Against the Death Penalty, Caribbean Court of Justice strikes down mandatory death penalty in Barbados, (June 18, 2018). Available online at <https://worldcoalition.org/2018/06/27/caribbean-court-of-justice-strikes-down-mandatory-death-penalty-in-barbados/>.

¹⁹ Colville Mounsey, *Barbados Parliament Passes Constitutional Amendment Eliminating Mandatory Death Penalty Sentences*, Constitution Net, 15 April 2019, [https://constitutionnet.org/news/barbados-parliament-passes-constitutional-amendment-eliminating-mandatory-death-penalty#:~:text=The%20Constitution%20\(Amendment\)%20Bill%202019,mandatory%20death%20sentence%20was%20unconstitutional.](https://constitutionnet.org/news/barbados-parliament-passes-constitutional-amendment-eliminating-mandatory-death-penalty#:~:text=The%20Constitution%20(Amendment)%20Bill%202019,mandatory%20death%20sentence%20was%20unconstitutional.)

²⁰ OFFENSES AGAINST THE PERSON (AMENDMENT) ACT, 2018.

²¹ Amnesty International, *Death Sentences and Executions 2022*, ACT 50/5418/20222, (May 2022) Also available at <https://www.amnesty.org/en/documents/act50/5418/2022/en/>

²² Press Release, World Coalition Against the Death Penalty, Caribbean Court of Justice strikes down mandatory death penalty in Barbados, (June 27, 2018) Also available online at <https://worldcoalition.org/2018/06/27/caribbean-court-of-justice-strikes-down-mandatory-death-penalty-in-barbados/>

²³ Santana Salmon, *Barbados Appeal Court Vacates Death Sentence on Man Convicted for Fire at a Store that Killed Six Women*, Caribbean National Weekly, 8 June 2022, <https://www.caribbeannationalweekly.com/news/caribbean-news/barbados-appeal-court-vacates-death-sentence-on-man-convicted-for-fire-at-a-store-that-killed-six-women/>.

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- ²⁴ Santana Salmon, *Barbados Appeal Court Vacates Death Sentence on Man Convicted for Fire at a Store that Killed Six Women*, Caribbean National Weekly, 8 June 2022, <https://www.caribbeannationalweekly.com/news/caribbean-news/barbados-appeal-court-vacates-death-sentence-on-man-convicted-for-fire-at-a-store-that-killed-six-women/>.
- ²⁵ OFFENSES AGAINST THE PERSON ACT, Art. 2. Available online at <https://www.warnathgroup.com/wp-content/uploads/2015/03/Barbados-Offences-Against-the-Person-Act.pdf>.
- ²⁶ Cornell Center on the Death Penalty Worldwide, “Barbados,” Accessed 4 October, 2022. Available at <https://deathpenaltyworldwide.org/database/#/results/country?id=7>.
- ²⁷ Bert Wilkinson, *Spike in Gun Crime Irks Barbados*, Caribbean Life, Sept. 9, 2022, <https://www.caribbeanlife.com/spike-in-gun-crime-irks-barbados/>.
- ²⁸ Bert Wilkinson, *Spike in Gun Crime Irks Barbados*, Caribbean Life, Sept. 9, 2022, <https://www.caribbeanlife.com/spike-in-gun-crime-irks-barbados/>.
- ²⁹ *No to Hangings*, Barbados Today, Sept. 8, 2022, <https://barbadostoday.bb/2022/09/08/no-to-hangings/>.
- ³⁰ *No to Hangings*, Barbados Today, Sept. 8, 2022, <https://barbadostoday.bb/2022/09/08/no-to-hangings/>.
- ³¹ The Death Penalty Project, *Sentenced to Death Without Execution: Why Capital Punishment Has Not Yet Been Abolished in the Eastern Caribbean and Barbados*, by Roger Hood and Florence Seemungal, (Oxford: December 2019), 27. Available online at https://dppproject.wpengine.com/wp-content/uploads/2020/04/2809872v1_WSDOCS_-Sentencing-to-Death-Without-Execution-2020.pdf.
- ³² On file with The Advocates for Human Rights.
- ³³ Barbados Chapter 112A, *Community Legal Services Act*, 1981-83, also available online at <http://barbadosparliament-laws.com/en/showdoc/cs/112A>.
- ³⁴ The Times of India, *Barbados PM Mottley to deliver annual Mandela lecture in South Africa*, (July 2, 2022) Also available at <https://timesofindia.indiatimes.com/world/rest-of-world/barbados-pm-mottley-to-deliver-annual-mandela-lecture-in-south-africa/articleshow/92620326.cms>.