

Should Forgiveness Be an Objective of Restorative Justice?

by

David T. Deal

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Introduction

Forgiveness lies at the heart of Christianity. Forgiveness is also commonly associated with the healing and reconciliation sought by participants in the relatively new restorative justice process. Yet by design restorative justice promotes neither seeking nor offering interpersonal forgiveness as an objective. Forgiveness-oriented Christians might view this exclusion of forgiveness as an objective as a dilemma, if not a paradox, leading to reservations about the use of restorative justice generally or even personal participation in the restorative justice process.

Without questioning the transformative potential of forgiveness or examining related topics like reconciliation, reparation and justice, this essay focuses on the prospect of offering interpersonal forgiveness and shows how the restorative justice process works. It shows that the rationale for not including interpersonal forgiveness as an objective neither compromises the restorative justice process' overall objective of promoting healing and reconciliation nor impairs any participant's freedom in the process to seek or offer forgiveness, whether based on religious, spiritual or secular grounds

A. Forgiveness Explored

Forgiveness is a very complex topic: "Generally regarded as a positive response to human wrongdoing, forgiveness is a conceptually, psychologically, and morally complex phenomenon."¹ Bash points out that as a value, forgiveness has been at various times ignored,

¹ *Stanford Encyclopedia of Philosophy*, s.v. "Forgiveness," first published May 6, 2010, substantively revised December 23, 2014, and accessed November 19, 2015, <http://plato.stanford.edu/entries/forgiveness>.

vilified and embraced.² For hundreds of years forgiveness was the sole province of theologians and religious people. However, by the last quarter of the Twentieth Century forgiveness had entered into the discourse of secular humanists, philosophers, psychologists and community leaders.³

In connection with related concepts like reconciliation and justice, forgiveness as a value has gotten more attention. Many philosophers and ethicists have emphasized a view that forgiveness is largely an ethical matter not a religious matter.⁴ Psychologist-therapists now more intensely examine the role of forgiveness in clinical intervention, drawing on the extensive body of interdisciplinary research by psychologist-researchers like Worthington examining the character of forgiveness and the myriad factors that bear on whether forgiveness is offered or withheld.⁵

Many local leaders have embraced myriad conflict resolution programs that embody elements emphasizing reconciliation and healing at the interpersonal level. Likewise, some national leaders have orchestrated national scale, reconciliation processes dealing with large scale social wrongdoing such as Apartheid, often adopting Desmond Tutu's oft-quoted "Without forgiveness, there can be no future." Lastly, using the real stories of victims and perpetrators, the

² Anthony Bash, *Forgiveness and Christian Ethics* (Cambridge, UK: Cambridge University Press, 2007), 23-24. This book is the first of a trilogy of Bash works on forgiveness, which now includes *Just Forgiveness* (London: SPCK, 2011) and *Forgiveness: A Theology* (Eugene, OR: Cascade Books 2015).

³Bash, *Forgiveness and Christian Ethics*, 24-35.

⁴ Bash, *Forgiveness and Christian Ethics*, 101-104.

⁵ See, e.g., Everett L. Worthington, Jr., ed. of two groundbreaking works synthesizing key research on forgiveness: *Dimensions of Forgiveness: Psychological Dimensions & Theological Perspectives*, (Philadelphia: Templeton Foundation Press, 1998) and *Handbook of Forgiveness*, (New York: Routledge, 2005) (including research agenda for 2005-2015). See also Everett L. Worthington, Jr., *A Just Forgiveness: Responsible Healing Without Excusing Injustice*, Intervarsity Press (2009) and Don E. Davis, Joshua N. Hook, Peter C. Hill, and Everett L. Worthington, Jr., "Research on Religion/Spirituality and Forgiveness: A Meta-Analytic Review," *Psychology of Religion and Spirituality* 2013, Vol. 5, No. 4, 233-241(explaining shifts in forgiveness-directed social science research).

journalism-driven Forgiveness Project,⁶ started in 2004, emphasizes the healing potential of forgiveness as an alternative to resentment, retaliation and revenge in the face of atrocity

1. What Is Forgiveness?

The New Testament, of course, offers no definition of forgiveness. Indeed, it uses the term relatively infrequently considering its prominence in Christian theology. Moreover, it reflects the different authors, writing at different times from different perspectives,⁷ using different metaphors and drawing on somewhat terms for forgiveness in use at the time.⁸

While theologians and social researchers have yet to reach any consensus on a definition of forgiveness,⁹ this essay adopts for the narrow forgiveness-restorative justice question it presents a simple working definition with some caveats: Forgiveness does not include some of the secondary meanings often associated with the term which have little relevance to Christian behavior in response to moral wrongdoing: forgetting, ignoring, denying, overlooking, excusing, minimizing, tolerating, exonerating, pardoning, or condoning. Nor does this definition equate human forgiveness with divine forgiveness or include large scale public forgiveness which has a different character than interpersonal forgiveness.¹⁰ Lastly, forgiveness is neither a synonym for reconciliation nor a substitute for justice, two concepts related, but separate from, forgiveness.

Accordingly, this essay uses the following definition: *Forgiveness involves releasing negative, retributive feelings of anger, hatred and resentment toward the offender and enacting a*

⁶ Forgiveness Project, www.theforgivenessproject.com; see also Marina Canatacuzino, *The Forgiveness Project: Stories for a Vengeful Age* (London: Jessica Kingsley Publishers, 2015) and Rodney L. Petersen, "Forgiveness Works," *Journal of Law and Religion* 28 (2013).

⁷ Bash, *Forgiveness: A Theology*, 77-127.

⁸ Bash, *Forgiveness: A Theology*, 25-31.

⁹ See, e.g., Bash, *A Theology*, 23 and Worthington, *Handbook of Forgiveness*, 3-5, 566.

¹⁰ Public resolution of large scale social justice issues, like Apartheid via the celebrated Truth and Reconciliation Commission, has an important forgiveness component but with a political dimension not involved in interpersonal forgiveness.

merciful response to a moral wrong. Given this working definition, how do Christians apply forgiveness?

2. Christian Forgiveness: Moral Value or Moral Duty?

Notwithstanding the common secular disinterest or even distaste for forgiveness in some quarters at different times,¹¹ forgiveness has long been a common feature of Christian religious life, although not the sole preserve of Christians.¹² As the precursor of Christianity, Judaism's Hebrew Bible is full of references to forgiveness, although it is usually divine forgiveness and usually dependent on human atonement.¹³ However, Christianity took forgiveness to a different level.

The historian Marty observes that in the New Testament, a Trinitarian view of God, inclusive of the God-man Jesus, offers a model for the granting of forgiveness and a clear model for men to follow:

That is, in the face of human sin and evil, God's love moves toward reconciliation by means of costly forgiveness. In response, human beings are called to become holy by embodying that forgiveness through specific habits and practices that seek to remember the past truthfully, to repair the brokenness, to heal divisions, and to reconcile and renew relationships.¹⁴

More succinctly, Bash observes that forgiveness is "embedded in the meta-narrative of the Bible"¹⁵ and in sparer, contemporary terms, that Jesus "synthesized, labeled and enhanced a pattern of behavior that is implicit in what it means to love one's neighbor."¹⁶

¹¹ Bash, *Christian Ethics*, 23-24.

¹² Bash, *Christian Ethics*, 24 and Michael L. Hadley, *The Spiritual Roots of Restorative Justice*, (Albany: State University of New York Press. 2001).

¹³ Bash, *Just Forgiveness*, 15-17.

¹³ Bash, *Just Forgiveness*, 15-17.

¹⁴ Martin E. Marty, "The Ethos of Christian Forgiveness," in *Dimensions of Forgiveness: Psychological Dimensions & Theological Perspectives*, ed. Everett L. Worthington, Jr., (Philadelphia: Templeton Foundation Press 1998), 1, citing L.G. Jones, *Embodying Forgiveness: A Theological Analysis*, Grand Rapids, MI: William B. Erdman (1995).

¹⁵ Bash, *Christian Ethics*, 79.

Overall, Christians draw heavily on the Gospels whose stories, accounts and parables depict the life of Jesus whose life often involved some aspect of forgiveness. As Marty observes: “Rather than treat all this doctrinally, most Christians have relied on the stories in the New Testament Gospels to inspire, regulate, measure, and recall what forgiveness was, is, and is to be in their community and in their lives.”¹⁷

3. Christian Forgiveness Practiced: a Dilemma?

The distinction between *seeking* forgiveness and *offering* forgiveness complicates its application. *Seeking* forgiveness presents its own personal challenges, but at least some denominations offer structured assistance via institutions like the Catholic Sacrament of Penance and Reconciliation or its Episcopal analog, Reconciliation of a Penitent.¹⁸ Indeed, Petersen suggests that “the practice of forgiveness has been clearly tied to penitence . . . often ‘spiritualized’ and removed from the practice of life.”¹⁹ So removed, “the public significance of forgiveness often languished as more retributive conceptions of justice dominated social theory, power politics, and practice.”²⁰

Offering forgiveness can be even more challenging. While most Christians would seem to agree on what forgiveness is, sharp differences exist on whether forgiveness is a moral virtue or a mandatory moral duty. At the liberal end of the religious belief axis, many Christians view forgiveness as a moral response to wrongdoing and a moral virtue or ethical ideal worthy of

¹⁶ Bash, *Forgiveness: A Theology*, 17.

¹⁷ Marty, “Ethos of Christian Forgiveness,” 19.

¹⁸ “Many religious and cultural traditions address the value of forgiveness for the individual and the community but yield little information on how to forgive outside of admonition to pray or meditate.” Carl E. Thoreson, Frederic Luskin, and Alex H.S. Harris, “Science and Forgiveness Intervention,” in *Dimensions of Forgiveness: Psychological Dimensions & Theological Perspectives*, ed. Everett L. Worthington, Jr., (Philadelphia: Templeton Foundation Press, 1998), 165.

¹⁹ Rodney L. Petersen, “A Theology of Forgiveness,” in *Forgiveness and Reconciliation*, Philadelphia: Templeton Foundation Press, 1998), 4.

²⁰ Petersen, “A Theology of Forgiveness,” 4.

emulation but not a mandatory moral duty, often citing reconciliation-oriented Scripture, such as 2 Corinthians 5:18-20 (“God . . . has given us the ministry of reconciliation”) and Matthew 5:7-9 (“Blessed are the merciful” and “Blessed are the peacemakers”) as well as pure, linguistic logic.²¹ At the opposite, conservative end, some Christians see forgiveness as a mandatory moral duty, often citing passages such as Matthew 6:9-13: “For if you forgive others when they sin against you, your heavenly Father will also forgive you. But if you do not forgive others their sins, your Father will not forgive your sins.” Somewhere in between, many duty-bound Christians would condition offering forgiveness on explicit offender atonement. In sum, whether or not forgiveness is a mandatory duty remains the subject of scholarly debate and discussion.²²

Complicating matters further, for some Christians there is a secular, humanistic axis, taking into account the extensive and continuing social science empirical research on forgiveness alluded to earlier, which has examined religion and other factors bearing on a person’s interest in, or even the advisability of offering, forgiveness.²³ For example, current social research shows that interpersonal forgiveness can be an attractive pathway for a victim to get beyond anger and resentment. However, current social research also shows that the benefits of forgiveness may be qualified, is better viewed as a process often requiring time for reflection, and in some cases not a healthy choice at all. While this research may present a confounding barrier to Christians who

²¹ See, e.g., Bash, *Christian Ethics*, 99, 101-110 (arguing that forgiveness is a moral virtue whose exercise is worthy of striving for but depending on the circumstances, and further cannot be a moral duty because it is not always morally right to forgive, not always possible, and that forgiveness is a “gift of undeserved favor” whose exercise cannot be involuntary).

²² Compare, e.g., Margaret R. Holmgren, *Forgiveness and Retribution: Responding to Wrongdoing*, Cambridge: Cambridge University Press (2012)(duty to forgive), Don McLellan, “Justice, Forgiveness, and Reconciliation: Essential Elements in Atonement Theology,” *Evangelical Review of Theology* 29, no.1 (2005)(duty to forgive after atonement): 4-15, and David Heyd, “Is There a Duty to Forgive?”, *Criminal Justice Ethics*, Vol. 32, no.2 (August 2013): 163-174, Review of Margaret R. Holmgren, *Forgiveness and Retribution* (no duty to forgive).

²³ See *supra* note 4 (citing key forgiveness-oriented social science researchers). See also Al Miles, “The Thorny Question of Forgiveness,” *The Clergy Journal* Vol 77, Issue 8 (July 2001): 6-7 (drawing on social science research, focusing on domestic violence and offering a list of common phrases that facilitate the misapplication of forgiveness as a duty, e.g., “Forgive and forget” or “Turn the other cheek”).

see forgiveness as a mandatory duty, it may give less duty bound Christians a comforting escape path from any duty to offer forgiveness.

Inasmuch as the restorative justice process applies on a case-by-case basis, a person with a propensity, if not an obligation, for offering forgiveness as a vehicle for reconciliation, could find the process troubling, unless that that person understands restorative justice's exclusion of forgiveness as an objective. The second part of this essay addresses that concern directly.

B. Restorative Justice Explained

1. What Is Restorative Justice?

Restorative justice is a victim-centered conflict resolution process directed at healing and reconciliation through victim-offender dialogue. Whereas traditional or retributive justice is offender-oriented and focuses on what rule was broken and what punishment is appropriate, restorative justice focuses on the nature of the harm and what might be done to repair the harm.

As an alternative to traditional retributive justice, restorative justice is a relative newcomer to North America. The term "restorative justice" seems to have been first used in the 1950's²⁴ and picked up some momentum in the 1970's when some promoted a "new paradigm" for criminal justice.²⁵ By the 1990's its North American usage in criminal proceedings had begun in earnest and since then the restorative justice movement has continued to grow. Notwithstanding its

²⁴ Lorraine Stutzman Amstutz, "Restorative Justice: The Promise and the Challenges," *Vision* 14, No. 2 (Fall 2013): 26.

²⁵ Albert W. Dzur & Alan Wertheimer, "Forgiveness and Public Deliberation: The Practice of Restorative Justice." *Criminal Justice Ethics*, Winter-Spring 2002: 4.

secular design character, many proponents of restorative justice cite deep Scriptural roots, linking it with concepts such as reconciliation, justice and forgiveness.²⁶

In his manifesto for the restorative justice movement, *Changing Lenses*, Howard Zehr builds on the new paradigm and offers a core rationale for restorative justice, describing crime as a “violation of people and relationships. It creates obligations to make things right. Justice involves the victim, the offender and the community in a search for solutions which promote repair, reconciliation, and reassurance.”²⁷

Restorative justice has evolved and, while most commonly employed for nonviolent juvenile crimes, has evolved to embrace a wide variety of models increasingly employed worldwide to handle a wide range of criminal justice and juvenile justice matters,²⁸ school discipline, community conflicts, and workplace conflicts. As Amstutz observes, “Restorative justice provides a framework for looking at justice through a set of values that include (but is not limited to) respect, relationships, responsibility, and accountability to one another.”²⁹

2. Restorative Justice in Practice

Restorative justice is an alternative philosophy of justice not a rigid set of procedures, and the particular process employed is chosen to reflect the circumstances and venue. Unlike a therapist-managed intervention, such as marriage counseling, where the therapist might suggest particular

²⁶ Michael L. Hadley, *The Spiritual Roots of Restorative Justice*, (Albany: State University of New York Press, 2001) (citing several religious traditions) and Ched Myers and Elaine Enns, *Ambassadors of Reconciliation* (Maryknoll, N.Y.: Orbis Books, Vol. 1, 2009) (whose title invokes 2 Corinthians 5:16).

²⁷ Howard Zehr, *Changing Lenses: A New Focus for Crime and Justice* (Scottsdale, PA: Herald Press 2005), 181. Howard Zehr remains active in the field and is co-director of the Zehr Institute for Restorative Justice at Eastern Mennonite University.

²⁸ Although restorative justice is typically confined to nonviolent conflicts, it is flexible enough to handle violent crimes. See *infra* text accompanying note 37 (describing application of restorative justice for sentencing in a homicide case).

²⁹ Amstutz, “The Promise and the Challenges,” *Vision* 14, No. 2 (Fall 2013): 26.

strategies or outcomes, the restorative justice process has a facilitator-managed mediation character where outcomes issue from the principal participants. Whereas some mediations are settlement-driven, deemphasize emotions and relationships, emphasize compromise and sometimes involve facilitator outcome suggestions, the restorative justice process is dialogue-driven, values emotions and relationships, and avoids facilitator outcome suggestions.³⁰

Typically, in a simple case the key participants include the victim and the offender, although other stakeholders, like parents or spouses but not lawyers, often participate as well. To promote openness the conference often takes place in an open circle and the facilitator guides the principal parties through a series of key questions: What happened? Who was harmed? What should be done to repair the harm? Overall, the process is voluntary and values victim and offender narratives, but it is neither an adjudication process nor a fact-finding session. The primary objective is to get the principal participants to address one another directly and honestly, illuminate what happened, and without facilitator prompting, explore some reasonable mutually agreeable terms directed at repairing the harm, often in writing and executed by the participants with compliance strictly enforced.

3. Restorative Justice Outcomes

The outcomes sought are specific, appropriate for the participants, and directed at the harm at issue, such as: restitution in dollars or personal services, community service, offender vows not to repeat the harmful behavior, and commitment to alternative, non-harmful behaviors. Irrespective of the terms of any agreement, the dialogue process itself can have therapeutic value for both victim and offender: With offender-supplied information a victim might arrive at a better understanding of the offender's state of mind and may release pent up anxiety, anger and

³⁰ Mark S. Umbreit and Marilyn Peterson Armour, *Restorative Justice Dialogue: An Essential Guide for Research and Practice* (New York: Springer Publishing Company, 2011), 239-264.

resentment. With victim-supplied information an offender might better appreciate the perceived harm, be motivated to display some empathy, and perhaps offer an appropriate apology, if not seek forgiveness.

Irrespective of the particular process employed and agreed upon actions to be taken in the (often near) future, a restorative justice process *often* leads to apologies, but not always. Likewise, the restorative justice process *sometimes* leads to forgiveness, but not always. When forgiveness does occur, it often flows from an apology deemed sincere, yet even acceptance of the apology does not always lead to forgiveness. On the other hand, there are notable, but rare, examples of victims suffering horrendous harm then offering offenders forgiveness without any expression of offender remorse or even opportunity for expression of empathy, for example, the almost immediate expression of forgiveness in 2015 by the surviving family members directed at the slayer of nine church members of the AME Church in Charleston, South Carolina.

4. Forgiveness and Restorative Justice: a Dilemma?

Offenders can seek forgiveness and victims can offer forgiveness. However, this paper remains focused on the latter, a far more complicated process. While forgiveness is often associated with healing, reparation and reconciliation, as Umbreit and Armour explain, “Forgiveness in restorative justice is multi-faceted and conditioned by a protective reactivity against the imposition of religious doctrine or social expectation.”³¹ This “protective reactivity” involves a core principle and a core purpose.

³¹ Mark S. Umbreit and Marilyn Peterson Armour, “The Paradox of Forgiveness in Restorative Justice,” in *Handbook of Forgiveness*, ed. by Everett J. Worthington, Jr., (New York: Routledge, 2005): 494.

At the very heart of the restorative justice process is respect of self-determination. Any actual or perceived prescribing of what a facilitator may personally view as desirable outcomes is at odds with a principle of restorative justice: enabling but not interfering with victim-offender dialogue.

Promoting forgiveness in particular touches on a transcendent core purpose: seeking healing. Inasmuch as restorative justice is a victim-centered process directed at healing, the restorative justice process is also especially sensitive to avoiding re-victimization, especially where the wrongful conduct at issue involves violence (e.g., domestic abuse). The victim of such harm might find forgiveness as a potential pathway to cast off anger and corrosive resentment. However, given the character and intensity of the harm experienced, the victim may also need considerable time to reflect and may never be able to offer forgiveness. Sensitivity to timing and the need for reflection aside, promoting victim forgiveness, directly or indirectly, however well-intended, can be guilt-imposing for the victim or, worse yet, further harm-inducing and, therefore, re-victimizing. For example, encouraging a victim of domestic abuse to “forgive and forget” may be irresponsibly putting that spouse in the line of more harm. Furthermore, the non-prescriptive role of restorative justice applies even where an offender has offered an apology: While an apology may lead to forgiveness, Braithwaite warns that “such an expectation . . . would destroy the moral power of forgiveness, apology or mercy forgiveness.”³²

Notwithstanding the need to avoid promoting forgiveness, restorative justice practitioners are mindful that forgiveness can be a transforming event, is often at play in the discourse and can be an outcome linked to several conditions, such as apology-making, remorse, empathy,

³² John Braithwaite, “Setting Standards for Restorative Justice,” *British Criminology Journal* 42 (2002): 571.

offender intentionality, severity of the crime, personal relationship, and religious convictions.³³ However, restorative justice practitioners such as Safer also recognize that healing often occurs without forgiveness.³⁴ While “it would be tempting to align restorative justice with forgiveness and draw the erroneous conclusion that restorative justice explicitly promotes forgiveness,”³⁵ Umbreit and Armour recognize its frequent appearance in restorative justice processes, and endorse the need for careful clinical and scholarly research to better understand forgiveness dynamics. However, consistent with Braithwaite and restorative justice practice orthodoxy, Umbreit and Armour emphasize that “the more forgiveness remains in the background with the focus on creating a safe place for dialogue, the more likely many, if not most, victims will feel safe enough to travel the path of authentic forgiveness *if that is what they truly desire*.(emphasis supplied).”³⁶

A Florida homicide case reported by the New York Times in January 2013³⁷ and attracting national attention illustrates how forgiveness can emerge without compromising the integrity of the restorative justice process. At issue was a 19-year old man charged with first degree murder of his girlfriend, which in Florida carries a mandatory life sentence. However, at his first meeting with the victim’s parents the prosecutor explained that he had broad discretion to depart from the state’s mandatory sentences. Soon thereafter the victim’s parents learned about restorative justice through an Episcopal priest-chaplain in the Florida prison system and to explore the matter

³³ Umbreit and Armour, “Paradox”: 496-498, *citing* several illustrative empirical studies by several recognized psychology researchers.

³⁴ Jeanne Safer, “Must You Forgive?” *Psychology Today* (August 1999): 72 (“Understanding need not lead to forgiveness but it can lead to wisdom.”)

³⁵ Umbreit and Armour, “Paradox”: 501.

³⁶ Umbreit and Armour, “Paradox”: 501.

³⁷ Paul Tillis, “Forgiven,” *New York Times Magazine*, January 6, 2013, 25-32 and “Can Forgiveness Play a Role in Restorative Justice,” *New York Times*, January 4, 2013, accessed November 15, 2015, <http://www.nytimes.com/2013/01/06/magazine/can-forgiveness-play-a-role-in-restorative-justice>. *See also* Ted Wachtel, “Restorative Justice Is Not Forgiveness,” posted January 30, 2013, accessed November 15, 2015, <http://www.huffingtonpost.com/ted-wachtel/restorative-justice-is-not-restorative-justice> *and* David Belden, “Radical Compassion: Restorative Justice Program Meets Needs of Both Victims and Perpetrators,” *NYTimes eXaminer*, January 20, 2013, accessed November 15, 2015, <https://www.nytexaminer.com/2013/01/radical-compassion>.

enlisted Howard Zehr and ultimately, Sujatha Baliga, a former student of Howard Zehr and an active restorative justice practitioner.

Notwithstanding that facilitator's early skepticism that restorative justice might work for a homicide case, the victim's parents were eager to forgive and the defendant was eager to seek forgiveness; with this eagerness to participate and the cooperation of the prosecutor a restorative justice process was commenced. What emerged from the restorative justice process was the entry of a guilty plea and the court's acceptance of a proposed sentence of 20 years in prison. True to restorative justice principles, while forgiveness was not an objective, the process allowed the participants to examine the matter and arrive at the conclusion that forgiveness was being sought, could be offered, and could be applied by the prosecutor in seeking and obtaining a sentence less than the state's default mandatory sentence.³⁸

Conclusion

Forgiveness is an integral part of the Christian ethos and some Christians even regard it as a mandatory duty. However, identifying forgiveness as an objective would be incongruous with dialogue-driven, mediation-like restorative justice process. While exclusion of forgiveness as an objective may pose for some duty-bound Christians and others a dilemma or even a paradox, the exclusion is neither. With its special concern for healing and avoiding further harm, the established restorative justice process emphasizes self-determination and uses a mediation model structured to avoid impairing any deliberate choice regarding the seeking or offering of forgiveness, whether based on religious, spiritual or humanistic grounds.

³⁸ Concerned that the Paul Tillis New York Times article, *supra* note 36, had mistakenly conflated forgiveness with restorative justice, the restorative justice community responded forcefully to clarify the matter. *See, e.g.*, Sujatha Baliga, <http://emu.edu/now/news/2013/02/webinar-on-restorative-justice-in-high-profile-murder-case>, accessed November 15, 2015 ("Forgiveness is never a prerequisite for participation in restorative justice, nor is it an expected outcome of any restorative process, ever."). *See also* Ted Wachtel, "Restorative Justice Is Not Forgiveness," posted January 30, 2013, accessed November 15, 2015, <http://www.huffingtonpost.com/ted-wachtel/restorative-justice-is-not-restorative-justice>.

To preserve the integrity of the restorative justice process neither forgiveness, nor any other particular outcome, should be an objective. However, consistent with its overall focus on healing and reconciliation, the established restorative justice process accommodates forgiveness, but only if and when it emerges from the participating parties' collaborative dialogue.

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