

responsibility for harm they cause to others.¹¹⁷ Other rationales for reparation have focused on the role of the State, including that it is the State's absolute duty to protect its citizens from crime, that the State should ensure a more equitable distribution of income through transfers to those that suffer significant harm, and that crime is the fault or responsibility of society in general and therefore the State should facilitate the reparation of those who suffer from harmful acts.¹¹⁸ The reparation of victims can also be justified using Rawls' theory of justice, that applying a rule of aggregation (allots individuals are uncertain if they will be victims of actions beyond their control) can lead to some reparation of victims on fairness grounds.¹¹⁹ Bentham's utilitarian theory can also be applied, that if marginal utility from the receipt of income or any other form of reparation differs across victims and non-victims, or if non-victims gain utility from providing assistance to victims, then some form of victim reparation is likely to be required to maximise happiness.¹²⁰

In practice, whatever one's rationale for reparation, economic, political and social considerations will usually require that normative judgments be made as to which victim populations are to be repaid relative to other social needs, as well as how such reparation is to occur.

In the event that reparation is to occur, at least some form of material reparation is desirable. This is because different victims have different needs, with some victims preferring restitution, compensation or some other type of material reparation, and other victims preferring symbolic reparation.¹²¹ In addition, material reparation is thought to have symbolic value off itself, representing that the perpetrator is not above the law and indirectly expressing a commitment to making amends and taking responsibility for harm caused.¹²² Not providing any material reparation can therefore diminish the reparative effect of other efforts. Finally, purely symbolic gestures following gross and systematic abuses of human rights are unlikely to be perceived as fair or appropriate, and risk not being recognized as sufficient reparation.

What forms can a reparation programme take?

The design and implementation of a reparation programme can involve many different and difficult decisions. This can be the case if a judicial approach to reparation is adopted, and in particularity not when reparation is undertaken as a broad political project.

Patrice de Clionoff of the International Center for Transitional Justice has identified different elements of reparation programs which are discussed below.¹²³ Each of these elements involves difficult decisions to be made which influence the exact form of a reparation program.

¹¹⁷ Cheshire, D., *Truth or Reconciliation: The Role of Truth Commissions in Political Transition in Africa and Latin America* (1999), p. 60.

¹¹⁸ Tolokonnikov, M. H., *Human Compensation – Economic, Legal, and Political Aspects* (1997), p. 2.

¹¹⁹ Ibid, p. 2. See also Rawls, J., *A Theory of Justice* (1971), pp. 136–142.

¹²⁰ See Jeremy Bentham, *Introduction to the Principles of Morals and Legislation* (1789).

¹²¹ Interview with Patrice de Clionoff, Bangkok (12 January 2003). See also Black, H. L., *Colonial Projects – Colonization in the World since 1945* (2000), p. 199. Note by South Africa, most victims listed financial reparation as their first priority and moral. Colvin, C. E., "Reparations of the Reparations Program in South Africa", in De Clionoff, P. (ed.), *The Politics of Reparations* (2000), p. 176.

¹²² Phinney, C. E., *Reparations Worldwide: What We Know about Apology* (1), *Political Science and the Law* 20 (2002) 207, p. 207.

¹²³ De Clionoff, P., "Reparating the Past: Compensation for Victims of Human Rights Violations", in De Clionoff, P. (ed.), *The Politics of Reparations* (2000), pp. 6–33.

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