



INTERNATIONAL SCHOOL FOR JUVENILE JUSTICE



‘JUVENILE JUSTICE WITHIN EUROPE FROM AN INTERNATIONAL PERSPECTIVE’

ONLINE TRAINING COURSE





I. PRESENTATION OF THE INTERNATIONAL SCHOOL FOR JUVENILE JUSTICE.

THE INTERNATIONAL SCHOOL FOR JUVENILE JUSTICE (ISJJ) IS A TRAINING AND RESEARCH SPACE ON AN INTERNATIONAL LEVEL WHOSE PRIORITY PURPOSES ARE TO REINFORCE THE GENERATION AND DISSEMINATION OF KNOWLEDGE AND THE DEVELOPMENT OF TRAINING ACTIONS IN THE VARIOUS FIELDS RELATED TO JUVENILE JUSTICE.

It is set up as an interdisciplinary training and research centre which belongs to the [International Juvenile Justice Observatory](#), in order to contribute to the promotion of a **GLOBAL JUVENILE JUSTICE WITHOUT BORDERS.**

The International School for Juvenile Justice is also a way to promote meetings, cooperation and networking among professionals, researchers, teachers, agents and public and private organisms which are active in the field of juvenile justice. Its main course of action is to address the most important questions regarding prevention, educational intervention, the judicial framework, protection of minors, social inclusion, etc.

A. DEFINITION AND MISSION

The International School for Juvenile Justice (ISJJ) is an international centre whose objective is to develop training and research programmes as well as to generate and disseminate knowledge in the field of the most relevant juvenile justice topics around the world.

Through training and research, the School's objective is to promote the integral development of minors and young people who find themselves in situations of exclusion, seclusion or at social risk.

The School is committed to promotion and participation in research projects, studies, publications, etc. as well as to organizing and participating in training actions, seminars, courses, conferences, etc.

The School also supports the international cooperation between professionals, academic and training institutions, and organizations that work in fields relating to juvenile justice.



B. OBJECTIVES

The International School for Juvenile Justice aims to achieve the following **objectives**, all of which are based on the integral promotion of minors and young people in exclusion, seclusion or at social risk:

1. To develop training actions - delivered either in person or through distance learning - concerning the defence and protection of children's, adolescents' and young people's rights.
2. To support the creation and dissemination of knowledge which contributes towards the improvement of the situation and treatment of minors and young people at social risk.
3. To promote and participate in research in the fields of prevention, protection and intervention with regard to minors and young people, especially within the field of juvenile justice.
4. To participate in international knowledge networks that contribute to the development of the objectives of the International School for Juvenile Justice.
5. To encourage awareness actions regarding childhood, adolescence and youth.
6. To promote knowledge of the situation of children and youth around the world, in close cooperation with observatories and organisations on different continents.

C. TRAINING

Within the different activity areas of the International School for Juvenile Justice, **on-site training and e-learning** represent one of the priority action pillars.

This way the International School for Juvenile Justice is conceived as a **virtual school without borders**, committed to the training of juvenile justice professionals and managers: psychologists, social workers, lawyers, judges, prosecutors, social educators, criminologists, teachers, doctors, etc.

The International School for Juvenile Justice wants to be an active agent in the promotion and dissemination of knowledge on the situation of the world's minors and young people that are in conflict with the law, participating actively in **seminars, conferences, congresses**, etc.

The International School for Juvenile Justice is able to collaborate with universities, public and private training and/or research bodies and centres as well as other institutions and organisations which may help it to achieve its objectives.

D. RESEARCH



The School will carry out and support research actions that facilitates the analysis and the creation of knowledge within areas relevant to the overall development of minors and young people in conflict with the law.

The School can therefore establish agreements with public or private, local, regional, national and international institutions and organisms, as well as with governmental or non-governmental organisations with a view to facilitating the execution of research projects.

As an active R&D&I agent, the International School for Juvenile Justice is also set up as a channel to disseminate existing knowledge on an international and comparative level in the best manner possible.

In general, the International School for Juvenile Justice can cooperate with universities, public and private training and/or research organisms and centres as well as with other institutions and organisations that contribute to the promotion of a GLOBAL JUVENILE JUSTICE WITHOUT BORDERS.



II ONLINE TRAINING COURSE JUVENILE JUSTICE WITHIN EUROPE FROM AN INTERNATIONAL PERSPECTIVE: COURSE DESCRIPTION

INTRODUCTION

MANY EUROPEAN COUNTRIES HAVE ACKNOWLEDGED THAT JUVENILES SUBJECT TO CRIMINAL JUSTICE PROCEEDINGS SHOULD BE REGARDED AS A SPECIFIC GROUP OF PEOPLE WITH RIGHTS AND SPECIAL NEEDS. THIS RECOGNITION HAS BEEN PART OF DEVELOPMENTS IN MANY CRIMINAL JUSTICE SYSTEMS THROUGHOUT THE 20TH CENTURY. IN ADDITION, IT HAS BEEN PROMPTED BY THE DEVELOPING INTERNATIONAL HUMAN RIGHTS FRAMEWORK OF THE UNITED NATIONS AND THE COUNCIL OF EUROPE.

STILL, THERE IS A WIDE VARIETY OF LAWS AND PRACTICES AFFECTING THE POSITION OF JUVENILES WHO (ALLEGEDLY) ARE IN CONFLICT WITH THE LAW, WITH VERY DIFFERENT AND SOMETIMES UNCERTAIN OR EVEN UNLAWFUL OUTCOMES. IN ADDITION, THERE ARE MANY CHALLENGES REGARDING THE IMPLEMENTATION OF THE HUMAN RIGHTS OF THESE JUVENILES, WHO GENERALLY ARE STILL MINORS.

THIS ONLINE TRAINING COURSE OF THE INTERNATIONAL JUVENILE JUSTICE SCHOOL OFFERS A COMPREHENSIVE TRAINING ON JUVENILE JUSTICE IN EUROPE WITH PARTICULAR ATTENTION TO THE IMPLICATIONS OF INTERNATIONAL HUMAN RIGHTS STANDARDS FOR JUVENILES IN CONFLICT WITH THE LAW AT THE DOMESTIC LEVEL.

A. AN ONLINE TRAINING COURSE: FRUIT OF THE EXPERTISE

THE COURSE HAS BEEN DEVELOPED IN COOPERATION WITH PROF DR TON LIEFAARD, LEIDEN LAW SCHOOL AND IS ORGANIZED BY THE INTERNATIONAL JUVENILE JUSTICE SCHOOL (IJJS)

TON LIEFAARD GRADUATED IN 2001 FROM LAW SCHOOL AT THE VU UNIVERSITY AMSTERDAM. HE WORKED AS A SENIOR JUDICIAL CLERK AT THE AMSTERDAM CRIMINAL COURT OF APPEAL FROM 2002 UNTIL 2003 AND AS A PHD RESEARCHER & LECTURER IN JUVENILE LAW AT THE VU UNIVERSITY



AMSTERDAM, FACULTY OF LAW, FROM 2003 UNTIL 2008. HE HAS BEEN WORKING AT THE WILLEM POMPE INSTITUTE OF CRIMINAL LAW AND CRIMINOLOGY, UTRECHT UNIVERSITY, SINCE APRIL 2008.

His research focuses on (inter)national juvenile justice & juvenile law (incl. closed youth care) and penal & penitentiary law. In addition, he addresses various human rights and children's rights issues. In October 2008 he defended his doctoral thesis 'Deprivation of Liberty of Children in Light of International Human Rights Law and Standards' (Intersentia Publishing, Antwerpen/Oxford/Portland 2008). In 2009 en 2010 he was a post-doc research fellow at the North-West University, Faculty of Law, South Africa.

TON LIEFAARD TEACHES THE FOLLOWING COURSES : STRAFRECHTELIJKE SANCTIES (MASTER; 'PENAL SANCTIONS'), HUMAN RIGHTS & CRIMINAL LAW (MASTER), COMPARATIVE CRIMINAL LAW (BACHELOR) AND JUVENILE LAW (BACHELOR). HE ALSO SUPERVISES MASTER THESES.

Ton Liefwaard is a deputy judge at the District Court of Amsterdam and a member of the supervisory committee of 'Amsterbaken', a youth custodial institution for boys in Amsterdam. Furthermore, he is a member of the editorial board of the Tijdschrift voor Familie- en Jeugdrecht (Dutch Journal of Family and Juvenile Law). He teaches post-academic courses for practitioners (judges, lawyers, public prosecutors, youth institutions etc.) on a regular basis in the Netherlands and abroad. In addition, he acts as (inter)national consultant on various projects concerning children's rights and juvenile law & juvenile justice (e.g. for Defence for Children International and Unicef).

B. AN ONLINE TRAINING COURSE ADAPTED TO THE EXPECTATIONS OF JUVENILE JUSTICE STAKEHOLDERS

1. TARGET GROUP

PROFESSIONALS; MEMBERS OF EUROPEAN COUNCIL FOR JUVENILE JUSTICE; PROFESSIONALS OF IJJO PARTNERS.

THE COURSE WILL BE OPENED UP TO OTHERS WHO HAVE A PARTICULAR INTEREST IN JUVENILE JUSTICE: STUDENTS, ACADEMICS ETC.



2. OBJECTIVES (GENERAL)

THE OVERALL AIM OF THIS COURSE IS TO OFFER A COMPREHENSIVE TRAINING ON JUVENILE JUSTICE IN EUROPE WITH PARTICULAR ATTENTION TO THE IMPLICATIONS OF INTERNATIONAL HUMAN RIGHTS STANDARDS FOR CHILDREN IN CONFLICT WITH THE LAW AT THE DOMESTIC LEVEL.

3. OBJECTIVES (SPECIFIC)

I. COURSE PARTICIPANTS ACQUIRE KNOWLEDGE OF AND INSIGHT IN:

- THE MOST RELEVANT THEMES OF JUVENILE JUSTICE;
- THE RELEVANT INTERNATIONAL JUVENILE JUSTICE STANDARDS AND IMPLICATIONS FOR THE ADMINISTRATION OF JUVENILE JUSTICE;
- SIGNIFICANT REFERENCES (LITERATURE, REPORTS, INTERNET SOURCES ETC.), WHICH ENABLE THE PARTICIPANTS TO FURTHER STUDY THE THEMES ADDRESSED IN THIS COURSE;
- METHODS TO FURTHER EXPLORE (OTHER) ASPECTS OF THE THEMES THAT HAVE NOT BEEN ADDRESSED IN THIS COURSE;
- METHODS TO FURTHER EXPLORE (OTHER) ASPECTS OF THE THEMES THAT HAVE NOT BEEN ADDRESSED IN THIS COURSE.

II. COURSE PARTICIPANTS ACQUIRE SKILLS TO:

- EXPLAIN TO OTHERS THE MEANING OF SPECIFIC JUVENILE JUSTICE STANDARDS FOR THE DOMESTIC JUVENILE JUSTICE SYSTEM;
- APPLY RELEVANT INTERNATIONAL JUVENILE JUSTICE STANDARDS TO A PARTICULAR CASE AND PROVIDE REASONED ARGUMENTS;
- ASSESS TO WHAT EXTENT LAWS, POLICIES AND CASE LAW ARE IN CONFORMITY WITH INTERNATIONAL STANDARDS;
- ASSESS HOW LAWS, POLICIES AND CASE LAW OF ONE JURISDICTION RELATES TO THOSE OF ANOTHER JURISDICTION;
- WRITE A PAPER ON ONE SPECIFIC JUVENILE JUSTICE ISSUE FROM AN INTERNATIONAL AND COMPARATIVE PERSPECTIVE.



4. METHODS

THE ONLINE COURSE PROVIDES BASIC KNOWLEDGE AND REFERS TO RELEVANT OFFLINE AND ONLINE SOURCES (LITERATURE, REPORTS, WEBSITES ETC.). IN ADDITION, RECOMMENDED READING WILL BE SUGGESTED (*INTER ALIA*, OFFERING MORE IN DEPTH INFORMATION ON SPECIFIC ISSUES AND OTHER RELEVANT PERSPECTIVES, SUCH AS COMMUNITY AND SOCIOLOGICAL PERSPECTIVE, PSYCHOLOGICAL PERSPECTIVE, SOCIO-EDUCATIONAL PERSPECTIVE).

THE COURSE WILL BE PUBLISHED ON THE WEBSITE OF THE INTERNATIONAL JUVENILE JUSTICE SCHOOL. PARTICIPANTS WILL BE GUIDED THROUGH THE THREE MODULES AND CAN ACQUIRE BASIC KNOWLEDGE BY READING THE (PARTS OF) MATERIALS PROVIDED AND BY ANSWERING THE VARIOUS QUESTIONS AS WELL AS MAKING ASSIGNMENTS.

EACH MODULE WILL BE DIVIDED INTO DIFFERENT THEMES (1, 2, 3 ETC.), WHICH HAVE TO BE STUDIED SUCCESSIVELY. THERE ARE 11 THEMES IN TOTAL.

WITHIN EACH THEME BOTH RELEVANT LEGAL STANDARDS AS WELL AS RELEVANT IMPLEMENTATION STRATEGIES (LAW, POLICY ETC.) WILL BE ADDRESSED. IN ADDITION, THE MOST SIGNIFICANT ISSUES, CHALLENGES, DISCUSSIONS, DEVELOPMENTS ETC. WILL BE HIGHLIGHTED. EXAMPLES WILL BE PROVIDED BY USING A EUROPEAN COMPARATIVE PERSPECTIVE.

PARTICIPANTS WILL BE ASKED TO READ THE TEXTS PROVIDED ONLINE AND WILL BE REQUESTED TO STUDY SPECIFIC MATERIALS, CASE LAW ETC. IN ADDITION, THEY WILL BE REQUESTED TO ANSWER A SET OF QUESTIONS OR TO MAKE A SMALL ASSIGNMENT.

MOREOVER, ADDITIONAL INFORMATION (RECOMMENDED LITERATURE AND OTHER (ONLINE) REFERENCES) WILL BE PROVIDED, WHICH ENABLES PARTICIPANTS TO CONTINUE THEIR STUDIES.

THE COURSE WILL BE CONCLUDED BY AN EXAMINATION IN THE FORM OF A THESIS (SEE BELOW).

5. EXAMINATION



PARTICIPANTS ARE INVITED TO WRITE A THESIS ON ONE OF THE FOLLOWING THEMES FROM AN INTERNATIONAL AND COMPARATIVE PERSPECTIVE.

PARTICIPANTS ARE REQUIRED TO:

- FORMULATE A GENERAL RESEARCH QUESTION IN WHICH THEY TAKE THE INTERNATIONAL HUMAN RIGHTS PERSPECTIVE AS FRAME OF REFERENCE AND TRY TO ESTABLISH GOOD OR BAD PRACTICES;
- COMPARE ONE EUROPEAN JURISDICTION WITH ANOTHER ONE;
- WRITE A THESIS OF MAX. 6000-8000 WORDS, EXCL. FOOTNOTES/BIBLIOGRAPHY, IN ENGLISH AND WITH REFERENCES.

THEMES:

- AGE LIMITS AND THEIR PRACTICAL IMPLICATIONS;
- YOUTH COURTS AND PARTICIPATION OF JUVENILES;
- LEGAL AND OTHER REPRESENTATION;
- PRE-TRIAL DETENTION: BALANCING DUE PROCESS, RIGHT TO LIBERTY AND CRIMINAL JUSTICE INTERESTS;
- DIVERSION;
- RESTORATIVE JUSTICE;
- ALTERNATIVES TO INCARCERATION;
- DEPRIVATION OF LIBERTY AS A SENTENCE;
- DEPRIVATION OF LIBERTY AND THE (INTERNAL) LEGAL STATUS OF JUVENILES;
- SOCIAL REINTEGRATION AND AFTER CARE;
- ANY OTHER THEME, AFTER CONSULTATION AND APPROVAL OF IJJS.

6. REVIEW AND CERTIFICATE

THE THESIS WILL BE REVIEWED BY IJJS AND ONE EXTERNAL EXAMINER AND MARKED WITH AN A/A+ (GOOD/EXCELLENT), B (MODERATE) OR C (INSUFFICIENT).

A THESIS AWARDED WITH AN A OR B MEANS THAT THE CANDIDATE HAS PASSED AND CAN BE AWARDED THE IJJS CERTIFICATE.

A THESIS AWARDED WITH A C MEANS THAT THE CANDIDATE HAS NOT PASSED. HE OR SHE WILL BE PROVIDED WITH THE OPPORTUNITY TO RETAKE THE EXAM, WHICH MEANS THAT HE OR SHE HAS TO WRITE A NEW THESIS ON ONE OF THE OTHER THEMES.



7. PRESENTATION OF THE COURSE: PROGRAMME (OUTLINE AND DESCRIPTION)

A SHORT PRESENTATION OF THE COURSE WILL BE PROVIDED IN ORDER TO EXPLAIN THE COURSE CONTENT AS WELL AS THE METHODS TO THE PARTICIPANTS.

MODULE I: INTRODUCTION TO JUVENILE JUSTICE: EUROPEAN PHENOMENON AND HUMAN RIGHTS ISSUE

THIS MODULE SERVES AS AN INTRODUCTION AND HIGHLIGHTS THE KEY-ISSUES OF JUVENILE JUSTICE AS HUMAN RIGHTS ISSUES IN THE EUROPEAN CONTEXT.

THEME 1 – INTRODUCTION

IN THIS THEME THE ISSUE OF JUVENILE JUSTICE WILL BE INTRODUCED. PARTICIPANTS WILL BE PROVIDED SOME INSIGHT IN THE DEBATE CONCERNING FACTS AND FICTION (PERCEPTIONS) REGARDING YOUTH CRIME. IN ADDITION, THEY WILL BE INTRODUCED IN THE MOST COMMON APPROACHES (MODELS) TO JUVENILE JUSTICE AS WELL AS IN THE PHENOMENON OF JUVENILE JUSTICE AS A HUMAN RIGHTS ISSUE.

THEME 2 – INTERNATIONAL STANDARDS AND JUVENILE JUSTICE; EUROPEAN STANDARD SETTING

THIS THEME AIMS TO PROVIDE AN OVERVIEW OF THE RELEVANT INTERNATIONAL STANDARDS AT THE LEVEL OF THE UN AS WELL AS THE COUNCIL OF EUROPE (INCL. ONLINE REFERENCES). IN ADDITION, THE LEGAL VALUE OF THESE STANDARDS WILL BE ADDRESSED. FURTHERMORE, THE GENERAL ASSUMPTIONS AND KEY-ISSUES OF JUVENILE JUSTICE BASED ON THE INTERNATIONAL HUMAN RIGHTS FRAME WILL BE HIGHLIGHTED.

THEME 3 – KEY ACTORS IN JUVENILE JUSTICE

THIS THEME AIMS TO HIGHLIGHT TO ROLES AND RESPONSIBILITY OF THE DIFFERENT KEY ACTORS IN THE JUVENILE JUSTICE SYSTEM, IN LIGHT OF THE ASSUMPTION THAT A SEPARATE JUVENILE JUSTICE SYSTEM IMPLIES THE USE OF SPECIALIZED AUTHORITIES AND INSTITUTIONS.

MODULE II: PROCEDURAL ASPECTS OF JUVENILE JUSTICE

THIS MODULE ADDRESSES THE PROCEDURAL ASPECTS OF JUVENILE JUSTICE, INCLUDING THE APPLICABILITY / REACH OF JUVENILE JUSTICE, LARGELY DETERMINED BY THE AGE LIMITS.

THEME 1 – AGE LIMITS

THIS THEME ADDRESSES BOTH THE (CONTROVERSIAL) MINIMUM AGE OF CRIMINAL RESPONSIBILITY (MACR) AS WELL AS THE UPPER AGE LIMIT. IT ALSO ADDRESSES THE IMPLICATIONS OF INTERNATIONAL



HUMAN RIGHTS STANDARDS AND COMMON EUROPEAN PRACTICES. IN ADDITION, IT PAYS ATTENTION TO SOME OF THE CONTROVERSIES OF BOTH AGE LIMITS.

THEME 2 – COERCIVE MEASURES, WITH SPECIFIC FOCUS ON PRE-TRIAL DETENTION

THIS THEME IS ABOUT THE USE OF COERCIVE MEASURES FOR THE PURPOSE OF TRUTH FINDING AND OTHER CRIMINAL JUSTICE INTERESTS. IN PARTICULAR, THE ISSUE OF PRE-TRIAL DETENTION WILL BE ADDRESSED. ONE OF THE KEY-QUESTIONS IS: TO WHAT EXTENT MAY THE STATE LIMIT THE JUVENILE'S RIGHTS AND FREEDOMS AND WHICH LEGAL SAFEGUARDS SHOULD BE UPHELD? IN ADDITION, SOME ASPECTS OF THE JUVENILE'S LEGAL STATUS WILL BE ADDRESSED IN LIGHT OF SOME OF THE MOST COMMON EUROPEAN PRACTICES.

THEME 3 – YOUTH COURTS

THE THEME ABOUT THE YOUTH COURTS FOCUSES ON THE CRIMINAL TRIAL AND THE RIGHT OF THE JUVENILE TO PARTICIPATE EFFECTIVELY, AS PART OF HIS RIGHT TO A FAIR TRIAL. COMMON COURT PRACTICES WILL BE ASSESSED IN LIGHT OF THE INTERNATIONAL LEGAL FRAMEWORK (EUROPEAN CONVENTION ON HUMAN RIGHTS AND UN CONVENTION ON THE RIGHTS OF THE CHILD). THE ROLE OF PARENTS WILL ALSO BE HIGHLIGHTED.

THEME 4 – LEGAL OR OTHER APPROPRIATE ASSISTANCE

THIS THEME ADDRESSES THE SPECIAL ENTITLEMENT OF LEGAL OR OTHER REPRESENTATION, IN THE DIFFERENT PHASES OF THE CRIMINAL PROCEDURE: POLICE INTERROGATIONS, PRE-TRIAL DECISIONS, TRIAL AND POST-DISPOSITION PHASE. IN ADDITION, THE ROLE OF PARENTS WILL BE ADDRESSED IN LIGHT OF THIS ENTITLEMENT.

MODULE III – AIMS OF JUVENILE JUSTICE AND DISPOSITION

THIS MODULE ADDRESSES THE AIMS OF JUVENILE JUSTICE (SEE ALSO MODULE 1, THEME 2) AND THE VARIOUS DISPOSITIONS IN JUVENILE JUSTICE SYSTEMS. THE ISSUE OF RESTORATIVE JUSTICE WILL BE ADDRESSED HERE AS WELL.

THEME 1 - DIVERSION

THIS THEMES FOCUSES ON DIVERSION, ONE OF KEY-CHARACTERISTICS OF A SPECIAL JUSTICE SYSTEM FOR JUVENILES, PARTICULARLY IN LIGHT OF THE OBJECTIVES OF JUVENILES JUSTICE. WHAT DOES DIVERSION MEAN? WHAT ARE THE BENEFITS AND POTENTIAL RISKS OF THE USE OF DIVERSION? THESE AND OTHER QUESTIONS WILL BE ADDRESSED IN THIS THEME.

THEME 2 – SENTENCING AND ALTERNATIVES FOR DEPRIVATION OF LIBERTY



DEPRIVATION OF LIBERTY IS VERY COMMON IN JUVENILE JUSTICE. THIS THEME FOCUSES ON ALTERNATIVES AND ON THE MOST COMMON EUROPEAN PRACTICES. IN ADDITION, IT PAYS ATTENTION TO HUMAN RIGHTS ISSUES RELATED TO THE USE OF ALTERNATIVES, INCLUDING THE PRINCIPLE OF PROPORTIONALITY, PRIVACY AND FREEDOM OF MOVEMENT.

THEME 3 – DEPRIVATION OF LIBERTY

THIS THEME ADDRESSES THE HUMAN RIGHTS FRAME REGARDING THE USE OF DETENTION AND IMPRISONMENT AS A DISPOSITION. WHAT ARE THE REQUIREMENTS FOR THE USE OF DEPRIVATION OF LIBERTY AND WHAT LEGAL STATUS ARE DETAINED JUVENILES ENTITLED TO? THESE AND OTHER QUESTIONS WILL BE ANSWERED, WHILE LOOKING AT THE PHENOMENON IN EUROPE. FURTHERMORE, THE ISSUES OF REINTEGRATION AND AFTER CARE WILL BE HIGHLIGHTED.

THEME 4 – RESTORATIVE JUSTICE

THIS FINAL THEME OF THE COURSE AIMS THAT RESTORATION AS ONE OF THE OBJECTIVES OF JUVENILE JUSTICE AND ITS POSITION IN THE JUSTICE SYSTEM FOR JUVENILE, EITHER AS A FORM OF DIVERSION OR AS A FORM OF DISPOSITION. THE HUMAN RIGHTS IMPLICATIONS AS WELL AS EUROPEAN PRACTICES WILL BE ADDRESSED.

EXAM

SEE ABOVE.