

REDRESS

Ending torture, seeking justice for survivors

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REDRESS Submission to the Human Rights Council's Universal Periodic Review Working Group regarding the Review of the United Kingdom (UK)

31 March 2022

INFORMATION ABOUT THE ORGANISATION MAKING THIS SUBMISSION

REDRESS is an international NGO that pursues legal claims on behalf of survivors of torture in the UK and around the world to obtain justice and reparation for the violation of their human rights. REDRESS empowers survivors to access justice through human rights cases against governments, civil cases against individuals, and criminal cases where it advocates for law enforcement bodies to prosecute perpetrators under the principle of universal jurisdiction. Its approach is strategic, so that as well as representing an individual it targets the policy reasons that enabled the torture to take place, by building a campaign that uses advocacy, community engagement, and communications to influence change. REDRESS has a long history of engaging in reviews of the UK's adherence to its human rights treaty obligations, for example, by leading the compilation of civil society evidence to the Committee against Torture as part of its review of the UK in 2019.

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I. Introduction

1. The Redress Trust (REDRESS) makes this submission as part of the Fourth Cycle of the Universal Periodic Review (UPR) of the UK, to be held in October and November 2022. This submission focusses on issues which particularly fall within REDRESS's mandate, relating to torture and ill-treatment, and covers the UK legal framework, effective prevention and legal enforcement, immigration and asylum, treatment of women and girls, and LGBTIQ+ rights. This submission is not intended to be an exhaustive analysis of all issues related to torture and ill-treatment in the UK.
2. The UK accepted a number of important recommendations in relation to these issues during the previous UPR cycle in 2017, and where possible these are referred to in the submission, identifying where the UK either 'supported' or 'noted' the recommendation(s).

II. Legal framework

3. In its 2017 UPR, the UK noted a recommendation to ensure that that the proposed Human Rights Act (HRA) 1998 reforms have no impact on the scope of protection or the access to remedies under the European Convention on Human Rights (ECHR), while supporting a related recommendation to safeguard access to justice for all, including those most marginalised groups in society.¹
4. In December 2021, the UK Government set out proposals to replace the HRA with a new 'Bill of Rights' whilst remaining a party to the ECHR.² This proposal raises several concerns regarding the UK's compliance with its obligations under the ECHR in relation to torture and other cruel, inhuman or degrading treatment or punishment (CIDTP), including the prohibition on torture under Article 3 of the ECHR, and the obligation to provide an effective remedy for rights violations pursuant to Article 13 of the ECHR.
5. Two proposals will impede access to effective remedies for torture and CIDTP victims:
 - a. Firstly, HRA claimants will be required to demonstrate that they have suffered a 'significant disadvantage' before a human rights claim can proceed to court, unless the case is one of 'overriding public importance'.³ Torture and CIDTP victims may find it difficult to satisfy these tests given their vulnerability and the costs of litigation.
 - b. Secondly, the proposed amendment to s. 8(3) of the HRA will require UK victims to pursue private law claims before bringing HRA damages claims. This will add substantial complexity and costs to proceedings, and delay access to the European Court of Human Rights (ECtHR), if necessary, as Article 35(1) of the ECHR requires prior exhaustion of domestic remedies.
6. Further concerns arise from the proposed reforms to section 6 of the HRA, which (depending on the precise nature of the final proposals) could prevent public authorities from being the subject of a rights-based claim.⁴ This would provide a broad immunity for such bodies when they violate human rights, and risks limiting the obligation to provide remedies to victims.
7. Any reforms that restrict the rights of victims seeking redress is exacerbated by the UK's refusal to allow individual complaints to UN human rights treaty bodies. Despite noting a recommendation of the same in 2017,⁵ the UK has not made a declaration under Article 22 of

the United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (UNCAT) or signed the First Optional Protocol to the International Covenant on Civil and Political Rights (ICCPR). Respectively, these steps would allow individual communications before the UN Committee Against Torture (CAT) and provide competency to the Human Rights Committee (HRC) to review individual complaints.

8. In terms of criminal accountability, the UK noted a recommendation in 2017 to enact a complete prohibition of all forms of torture and remove “escape clauses” under the Criminal Justice Act (CJA) 1988.⁶ As of September 2020, however, there was no reported progress.⁷ The incorporation of all elements of the Article 1 UNCAT definition of torture into domestic criminal law should be a priority for the UK Government.

9. **Recommendations:**

- a. **Recognise that any claim for violation of the prohibition on torture or inhuman and degrading treatment is a matter of overwhelming public importance, and thus that a permission stage for human rights claims should not apply to limit the access to courts of victims of torture and ill-treatment.**
- b. **Not require victims to pursue private law claims before bringing HRA damages claims for torture or CIDT.**
- c. **Ensure that any HRA reforms do not prevent accountability of public bodies for breaches of human rights law, especially the prohibition on torture and ill-treatment.**
- d. **Fully incorporate the definition of torture expressed in article 1 of the UNCAT into domestic legislation, and in particular to repeal sections 134(4) and (5) of the CJA 1988.**
- e. **Make a declaration under Article 22 of the UNCAT to recognise the competence of the CAT to review individual communications.**
- f. **Sign and ratify the Optional Protocol to the ICCPR to allow individual petitions before the Human Rights Committee.**

III. Effective prevention and legal enforcement

Universal jurisdiction

10. In 2019, CAT noted concerns that the UK’s practice of granting special mission immunity has impeded the exercise of universal jurisdiction over perpetrators of torture.⁸ This is compounded by a general failure to prosecute for torture violations under universal jurisdiction laws. A 2016 response to a freedom of information request showed that the Home Office had knowledge of approximately 1,000 suspects of torture, only two of whom have ever been prosecuted.⁹ A third prosecution has since failed.¹⁰

Allegations of torture and CIDTP by the UK Armed Forces overseas

11. In its 2017 UPR, the UK supported a recommendation to expedite its investigation and act on allegations of complicity of British military personnel in the ill-treatment of civilians and detainees overseas, as well as to train public officials including the military in human rights and the excessive use of force.¹¹

12. The UK has not made sufficient progress in relation to either recommendation:

- a. Despite a finding by the Prosecutor of the International Criminal Court (ICC) that there was clear evidence of wrongdoing and the possible torture of detainees in British custody in Iraq, the UK has brought only limited prosecutions.¹² The CAT has also noted that the UK Government’s inquiry was prematurely closed due to lack of access to key

evidence, resulting from the UK Government's refusal to provide access to witnesses.¹³

- b. The development of training manuals for soldiers and officers produced since the 2011 Baha Mousa Inquiry report¹⁴ is welcomed, although areas for improvement remain, such as coverage of the need to protect detainees from mental pain and suffering.¹⁵
- c. The Overseas Operations (Service Personnel and Veterans) Act came into force on 29 April 2021, and enacts a limitation period of six years for bringing civil claims relating to overseas operations, which would make it much more difficult for survivors of torture to bring a legal claim against the British government where there has been torture or CIDTP.

Policing

13. The UK supported a 2017 UPR recommendation to train the police on human rights, including training on the excessive use of force.¹⁶ The Independent Office for Police Conduct (IOPC) has reported concerns over the use of force by the police in England and Wales in nearly a third of all investigations over a five-year period.¹⁷
14. However, there are ongoing concerns about the use by police of equipment and technologies carrying risks in respect of the prevention of torture and CIDTP:
 - a. The use of spit hoods has increased in the UK (translucent sacks of netting or meshed material placed over a person's head to block spit and other substances).¹⁸ Hooding has been condemned as ill-treatment on numerous occasions by CAT, the Special Rapporteur on Torture (SRT) and the ECtHR.¹⁹ The Equality and Human Rights Commission (EHRC) has also highlighted concerns over the use of spit hoods by the police, particularly on children.²⁰ A number of deaths have been reported following the use of spit hoods.²¹
 - b. The introduction of PAVA spray for use by all officers in adult male prisons in England and Wales has been the subject of serious concern by the EHRC.²² Compared with CS spray, PAVA has a greater potential to cause panic and gulping for air.²³
 - c. The UK Government continues to support expansion in the use of Tasers by the police.²⁴ Tasers can cause extreme pain, serious injury and even death,²⁵ and CAT has recognised that the use of Taser weapons could constitute 'a form of torture', particularly if used for a discriminatory purpose.²⁶ Tasers are three times more likely to be used in the UK against black men and women.²⁷

15. Recommendations:

- a. **Close the impunity gap by legislating for universal civil jurisdiction in respect of torture, and an exception to state immunity for such claims.**
- b. **Publish government policy on granting special mission immunity and ensure that such immunity is not granted to individuals where there is credible evidence that they have committed torture or other international crimes.**
- c. **Continue to investigate allegations of torture in detention centres run by UK armed forces, introducing more independent and transparent investigations and inquiries.**
- d. **Improve training manuals available to soldiers to encompass all aspects of torture.**
- e. **Ensure that force should only ever be used by police officers as a last resort and only when absolutely necessary, and any incidents of force should be fully investigated and closely monitored. Police forces must also ensure that the use of force is not used in a discriminatory way (whether directly or indirectly) and that all officers empowered to use force receive regular training in this regard.**

- f. **Ensure that police forces end the use of spit hoods in both custodial and extra custodial contexts.**
- g. **Not equip custodial staff with PAVA sprays on a routine basis, and ensure that they are only ever used as a last resort.**
- h. **Only permit the use of electronic discharge weapons, including Tasers, in extreme and limited situations as a substitute for lethal weapons, subject to the principles of necessity, proportionality, and non-discrimination.**

IV. Immigration and asylum

16. The UK government supported an array of recommendations concerning the rights of asylum seekers, refugees and migrants in its previous UPR. Among them were commitments to dedicate more resources to fighting negative stereotypes and addressing inequalities, guaranteeing and promoting migrants' rights, and ensuring the welfare of such groups.²⁸ Nonetheless, progress to date has been severely limited in a number of important areas.

Non-refoulement

- 17. During the process of seeking asylum in the UK, there have been reports that Home Office caseworkers have failed to apply the appropriate standard of proof when considering torture evidence.²⁹ The significant proportion of asylum denials overturned on appeal in the UK also raises serious questions regarding irregularities in the decision-making processes of the Home Office: between 2014-2018, approximately 75-80% of main applicants refused asylum at initial decision have lodged an appeal and approximately 40% of those appeals were allowed.³⁰
- 18. The Home Office has faced accusations of institutional racism,³¹ and a culture change may be required to enable the fair and effective processing of asylum applications for victims of torture. Otherwise, it is at significant risk of breaching its non-refoulement obligation under Article 3 of UNCAT.

Poor conditions and poor treatment in immigration detention facilities

- 19. Recommendations to adhere to international standards for detainees' rights and conditions in detention, as well as tackle the increase in self-harm and suicide rates in prisons, were supported by the UK in its 2017 UPR.³²
- 20. Despite the UK's full endorsement of these critical safeguards against torture and other ill-treatment, the EHRC's Human Rights Tracker reports that no related actions have been taken.³³ Immigration detention facilities have been found to be unsanitary,³⁴ and detainees have faced extended periods of locking in rooms, extensive use of restrictive measures, and the inappropriate mixing of sexes in accommodation spaces.³⁵ One report exposed detention officers strangling and threatening detainees, with medical staff conspiring to cover up the incident.³⁶ The SRT has stated that confinement in segregation units may amount to torture due to its irreversible effects and urged for its total ban.³⁷ However it is still used as a means of punishment,³⁸ resulting in cases of self-harm, attempted suicides and even deaths.³⁹

Nationality and Borders Bill 2021

- 21. The Nationality and Borders Bill 2021 (the Bill)⁴⁰ has been described as the greatest potential retrograde step in the UK's asylum system since the ratification of the 1951 Refugee Convention.⁴¹ The Bill is continuing its passage through Parliament. If adopted in the form proposed by the government, it would deprive those in need of protection from their most basic rights, and risk manifest violations of the prohibition on torture and CIDTP.⁴²
- 22. The most alarming aspects of the Bill are as follows:

- a. Clause 11 will effectively limit the rights of refugees under the Refugee Convention. Those who do not meet the stringent and restrictive criteria of a “Group 1” asylum seeker may be deprived of family reunification rights, provided no recourse to public funds unless destitution occurs, and left without an automatic settlement route. The lack of financial support to applicants also risks extreme poverty, homelessness, hunger, debt, and forced labour.⁴³ For torture survivors, this will violate the right to rehabilitation under Article 14 of UNCAT.
- b. Clause 28 will allow the removal of asylum seekers while their claims are still pending, providing for off-shore asylum processing.⁴⁴ In order to send claimants to off-shore processing a “safe country” threshold has to be met, but the threshold is low, and the adequacy of refugee protections are not considered.⁴⁵ Off-shore processing would likely lead to asylum seekers being held in detention camps which may not be subject to human rights monitoring, increasing risks of ill-treatment by detention officers and raising concerns regarding the adequacy of medical treatment, which, for survivors of torture, may further damage their mental health⁴⁶ and violate the right to rehabilitation under Article 14 of UNCAT.

23. Recommendations:

- a. **Provide further guidance and training to Home Office caseworkers to ensure that the correct burden of proof is applied when considering asylum applications.**⁴⁷
- b. **Publish statistics relating to the number of asylum claims involving allegations of past torture and the grant rate for these applications broken down by nationality and age.**⁴⁸
- c. **Allow for an independent public audit of the application of the standard of proof in asylum decisions to be undertaken by an independent body with the requisite legal expertise, such as the Office of the United Nations High Commissioner for Refugees.**⁴⁹
- d. **Ensure that the conditions of immigration detention are in compliance with international standards, including the United Nations Standard Minimum Rules for the Treatment of Prisoners (the Mandela Rules).**
- e. **Prohibit the incarceration of those suffering from serious mental health conditions.**
- f. **Ensure that segregation units are only used as a last resort.**
- g. **Remove Clauses 11 and 28 from the Nationality and Borders Bill.**

V. Treatment of women and girls, and LGBTIQ+ rights

- 24. In this area, the UK supported recommendations including to ratify the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention); dedicate resources to fight against negative stereotypes of LGBTIQ+ persons in the media; reinforce measures to combat all forms of discrimination; exert more efforts to counter violence against women and girls, using a holistic approach; and increase work to fight domestic violence.⁵⁰
- 25. In England and Wales, there has been a 6% rise in the cases of domestic abuse reported in the year March 2020-2021 with 845,734 cases being reported,⁵¹ but there has been no increase in the number of arrests.⁵² Moreover, the referrals of domestic abuse cases from the police to the Crown Prosecution Service (CPS) for a charging decision decreased by 3%, from 79,965 in the year March 2019-2020, to 77,812 in the following year.⁵³ Additionally, the CPS charging rate for domestic abuse-related crimes in England and Wales decreased from 76% in the year ending March 2018 to 70% in the year March 2020-2021.⁵⁴ This issue has become even more critical during the COVID-19 pandemic with a 22% increase in demand for domestic abuse hotlines in

the year 2020-2021.⁵⁵

26. Research suggests that around 11%⁵⁶ of the LGBTQ+ population experienced domestic abuse in the previous year, a rate which is significantly higher than that of the population as a whole (with a rate of 5.5% in 2020).⁵⁷ Misconceptions surrounding LGBTQ+ domestic abuse make it difficult for survivors and society to acknowledge and situate the experiences of LGBTQ+ people as domestic abuse,⁵⁸ leading to underreporting.

27. Recommendations:

- a. **Ensure that there is sufficient response to domestic abuse reports and effective investigation and prosecution of crimes.**
- b. **Review procedures and rules for giving evidence in prosecutions so victims feel secure bringing prosecutions.**
- c. **Ensure that there exists well-resourced, specialist LGBTQ+ support within the domestic abuse sector to effectively support LGBTQ+ victims and survivors.⁵⁹**

¹ UN Human Rights Council (UNHRC), Report of the Working Group on the Universal Periodic Review - UK (**Report of the Working Group**), 14 July 2017, UN Doc. A/HRC/36/9, Recommendation 134.73 and 134.154; UNHRC, Report of the Working Group - Addendum, Views on conclusions and/or recommendations, voluntary commitments and replies presented by the State under review (**Views on conclusions and/or recommendations**), 7 September 2017, UN Doc. A/HRC/36/9/Add.1, para. 3.

² Ministry of Justice, *Human Rights Act Reform: A Modern Bill of Rights*, December 2021.

³ Ibid, paras. 219-223.

⁴ Ibid, paras. 270-276.

⁵ UNHRC, Report of the Working Group, 14 July 2017, UN Doc. A/HRC/36/9, Recommendation 134.12; UNHRC, Views on conclusions and/or recommendations, 7 September 2017, UN Doc. A/HRC/36/9/Add.1, para. 3.

⁶ UNHRC, Report of the Working Group, 14 July 2017, UN Doc. A/HRC/36/9, Recommendation 134.136; UNHRC, Views on conclusions and/or recommendations, 7 September 2017, UN Doc. A/HRC/36/9/Add.1, para. 3. See s. 134 Criminal Justice Act (CJA) 1988. For escape clauses, s. 134(4) and (5) CJA.

⁷ Equality and Human Rights Commission (EHRC), *Human Rights Tracker*.

⁸ Committee Against Torture (CAT), *Concluding observations on the sixth periodic report of the United Kingdom of Great Britain and Northern Ireland (Concluding observations)*, 7 June 2019, UN Doc. CAT/C/GBR/CO/6, para. 48.

⁹ UK Foreign & Commonwealth Office, *Letter in Response to Freedom of Information Act 2000 Request Ref 0926-18*, 25 October 2016.

¹⁰ CAT, *Concluding observations*, 7 June 2019, UN Doc. CAT/C/GBR/CO/6, para. 48. For the failure of the third prosecution, see REDRESS, 'Court dismisses torture case against Agnes Taylor' (6 December 2019), available at: <https://redress.org/news/court-dismisses-torture-case-against-agnes-taylor/>

¹¹ UNHRC, Report of the Working Group, 14 July 2017, UN Doc. A/HRC/36/9, Recommendation 134.135; UNHRC, Views on conclusions and/or recommendations, 7 September 2017, UN Doc. A/HRC/36/9/Add.1, para. 3.

¹² International Criminal Court (Office of the Prosecutor), *Situation in Iraq/UK: Final Report*, 2020, paras. 7, 81-100; REDRESS analysis of publicly available material regarding prosecutions and convictions of soldiers since 2000 in relation to Iraq showed that 23 individuals have been charged, of which there have only been 5 convictions.

¹³ CAT, *Concluding observations*, 7 June 2019, UN Doc. CAT/C/GBR/CO/6, para. 34.

¹⁴ This found extensive failings and inconsistencies in the training of soldiers in relation to torture and CIDTP: see Baha Mousa Inquiry, Report: Volume II, 2011, para. 5.141.

¹⁵ E.S. Bates, 'The British Army's Training in International Humanitarian Law', 2020, 25(2) Journal of Conflict & Security Law, pp. 291-315.

¹⁶ UNHRC, Report of the Working Group, 14 July 2017, UN Doc. A/HRC/36/9, Recommendation 134.134 134.137 and 134.160; UNHRC, Views on conclusions and/or recommendations, 7 September 2017, UN Doc. A/HRC/36/9/Add.1, para. 3.

¹⁷ EHRC, *Is Britain Fairer?*, 2018, p. 152.

¹⁸ Redress, 'The UK's Implementation of the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment: Civil Society Alternative Report', March 2019, 38-39.

¹⁹ *Republic of Ireland v United Kingdom* [1978] ECHR 1 (5310/71); CAT, 'Concluding Observations of the Committee against Torture: Israel' (1997) UN Doc A/52/44, 257; UNCHR 'Civil and Political Rights Including Questions of Torture and Detention, Report of the Special Rapporteur' (2001) UN Doc. E/CN.4/2002/76, Annex 1, (f). Although some condemnation concerns 'black hooding' in particular, others condemn hooding in general terms which would encompass translucent spit hoods.

²⁰ EHRC, 'Is Britain Fairer?', 2018, p152.

²¹ Ibid.

²² EHRC, 'Torture in the UK: update report - Submission to the UNCAT in response to the UK List of issues', May 2019, 52-53.

²³ UK Home Office, *Comparison report on CS and PAVA Sprays*, 2014, p. 15.

²⁴ In March 2020 the Home Office announced that 41 forces in England and Wales will receive funds to purchase 8,155 devices: National Police Chiefs' Council, *Conducted Energy Devices*, available at <https://www.npcc.police.uk/NPCCBusinessAreas/OtherWorkAreas/Taser.aspx>

²⁵ Redress, 'The UK's Implementation of the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment: Civil Society Alternative Report', March 2019, p. 38.

²⁶ CAT, 'Conclusions and Recommendations of the Committee against Torture: Portugal', 2008, UN Doc CAT/C/PRT/4, para. 14.

²⁷ Redress, 'The UK's Implementation of the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment: Civil Society Alternative Report', March 2019, p. 38.

²⁸ UNHRC, Report of the Working Group, 14 July 2017, UN Doc. A/HRC/36/9, Recommendations 134.84, 134.95, 134.121, 134.163 and 134.216; UNHRC, Views on conclusions and/or recommendations, 7 September 2017, UN Doc. A/HRC/36/9/Add.1, para. 3.

²⁹ CAT, 'Concluding observations on the 6th periodic report of the United Kingdom of Great Britain and Northern Ireland' (2019) UN Doc CAT/C/GBR/CO/6, para 52.

³⁰ House of Commons Library Research Briefing, *Asylum Statistics*, SN01403, 2 March 2022.

- ³¹ Bail for Immigration Detainees, [Eight reasons why the Home Office can't be trusted with more power](#), 27 January 2022.
- ³² UNHRC, Report of the Working Group, 14 July 2017, UN Doc. A/HRC/36/9, Recommendations 134.137 and 134.160; UNHRC, Views on conclusions and/or recommendations, 7 September 2017, UN Doc. A/HRC/36/9/Add.1, para. 3.
- ³³ EHRC, [Human Rights Tracker](#).
- ³⁴ Stephen Shaw, 'Review into the Welfare in Detention of Vulnerable Persons: A report to the Home Office by Stephen Shaw', January 2016, p. 55.
- ³⁵ EHRC, 'Torture in the UK: update report Submission to the UN Committee Against Torture in response to the UK List of Issues', May 2019, p. 41.
- ³⁶ BBC Panorama, 'Undercover: Britain's Immigration Secrets', 4 Sept 2017; Redress, 'The UK's Implementation of the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment: Civil Society Alternative Report', March 2019, p. 27.
- ³⁷ UN News, [Solitary confinement should be banned in most cases, UN expert says](#), 18 October 2011.
- ³⁸ Medical Justice, [A Secret Punishment: The Misuse of Segregation in Immigration Detention](#), 2015, pp. 1-2.
- ³⁹ Stephen Shaw, 'Assessment of government progress in implementing the report on the welfare in detention of vulnerable persons: A follow-up report to the Home Office by Stephen Shaw', July 2018; Medical Justice, [Annual Review 2018-19](#), 2019; Mark Townsend, [Torture victims kept in solitary by Home Office for up to a year](#), *The Guardian*, 15 May 2021.
- ⁴⁰ References below are to the Bill as brought from the House of Commons to the House of Lords, 21 December 2021.
- ⁴¹ Electronic Immigration Network, [Barristers say Nationality and Borders Bill is biggest legal assault on international refugee law ever seen in the UK](#), 13 October 2021.
- ⁴² In addition to the concerns discussed below, there are further risks to UK compliance with its non-refoulement obligations arising from the impact the Bill would have on evidentiary thresholds and the possibilities for appeal in asylum determinations: see clauses 17-27.
- ⁴³ UN High Commissioner for Refugees (UNHCR), [Observations on the Nationality and Borders Bill](#), October 2021, para. 18.
- ⁴⁴ House of Commons Joint Committee on Human Rights, Legislative Scrutiny: Nationality and Borders Bill (Parts 1, 2 and 4) – Asylum, Home Office Decision-Making, Age Assessments, and Deprivation of Citizenship Orders (2021-2022, HC 1007, HL 143), para 114.
- ⁴⁵ UNHCR, [Observations on the Nationality and Borders Bill](#), October 2021, paras. 37 and 115.
- ⁴⁶ MSF, 'Indefinite Despair: Mental Health Consequences on Nauru', 3 December 2018, available at: <https://msf.org.au/article/statements-opinion/indefinite-despair-mental-health-consequences-nauru#:~:text=MSF's%20data%20also%20demonstrates%20that,among%20refugees%20and%20asylum%20seekers>
- ⁴⁷ CAT, 'Concluding observations on the 6th periodic report of the United Kingdom of Great Britain and Northern Ireland' (2019) UN Doc CAT/C/GBR/CO/6, para 53.
- ⁴⁸ Redress, 'The UK's Implementation of the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment: Civil Society Alternative Report', March 2019, p. 24.
- ⁴⁹ Redress, 'The UK's Implementation of the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment: Civil Society Alternative Report', March 2019, p. 24.
- ⁵⁰ UNHRC, Report of the Working Group, 14 July 2017, UN Doc. A/HRC/36/9, Recommendations 134.44, 134.180, 134.81, 134.83, 134.84 and 134.187; UNHRC, Views on conclusions and/or recommendations, 7 September 2017, UN Doc. A/HRC/36/9/Add.1, para. 3.
- ⁵¹ Office for National Statistics, 'Domestic Abuse in England and Wales Overview', November 2021, available at www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/domesticabuseinenglandandwalesoverview/november2021
- ⁵² Ibid.
- ⁵³ Ibid.
- ⁵⁴ Ibid.
- ⁵⁵ Ibid.
- ⁵⁶ Stonewall, 'LGBT in Britain: Homes and communities', 2018, available at www.stonewall.org.uk/cy/node/24594, p. 9.
- ⁵⁷ Office for National Statistics, 'Domestic abuse prevalence and trends, England and Wales: year ending March 2020', 25 November 2020, available at <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/domesticabuseprevalenceandtrendseotlandandwales/yearendingmarch2020>
- ⁵⁸ Interventions Alliance, 'Domestic Abuse in LGBT Communities' (25 May 2021), available at www.interventionsalliance.com/domestic-abuse-in-lgbt-communities/.
- ⁵⁹ Safe Lives, 'Free To Be Safe: LGBT+ people experiencing domestic abuse' (2018), available at safelives.org.uk/sites/default/files/resources/Free%20to%20be%20safe%20web.pdf