



Human Rights Council
Working Group on the Universal Periodic Review
Forty-first session
7–18 November 2022

Summary of stakeholders' submissions on the United Kingdom of Great Britain and Northern Ireland*

Report of the Office of the United Nations High Commissioner for Human Rights

I. Background

1. The present report was prepared pursuant to Human Rights Council resolutions 5/1 and 16/21, taking into consideration the periodicity of the universal periodic review. It is a summary of 71 stakeholders' submissions¹ to the universal periodic review, presented in a summarized manner owing to word-limit constraints. A separate section is provided for the contribution by the national human rights institutions that are accredited in full compliance with the Paris Principles. The report has been prepared taking into consideration the outcome of the previous review.²

II. Information provided by the national human rights institution accredited in full compliance with the Paris Principles

2. The Scottish Human Rights Commission (SHRC) and the Northern Ireland Human Rights Commission (NIHRC) recommended that the United Kingdom ratify all outstanding human rights treaties without reservation, including individual communications procedure.³ The Equality and Human Rights Commission (EHRC) recommended that the United Kingdom enhance the status of the ratified human rights treaties in domestic law.⁴ NIHRC recommended that the United Kingdom ratify the Council of Europe's Istanbul Convention on violence against women.⁵

3. EHRC, SHRC and NIHRC were concerned about the plan to replace the Human Rights Act 1998 with a Bill of Rights, which could reduce protection and limit access to redress among others.⁶ NIHRC was concerned that the proposal did not consider the Belfast (Good Friday) Agreement.⁷ SHRC recommended that the United Kingdom retain the Human Rights Act 1998.⁸ EHRC and NIHRC made similar recommendations.⁹

4. SHRC and NIHRC recommended that the United Kingdom provide and ensure their adequate funding.¹⁰ SHRC recommended that Scotland fully implement the Scotland National Action Plan for Human Rights (SNAP2).¹¹

* The present document is being issued without formal editing.



5. SHRC was concerned about the hate crimes and public harassment faced by women, LGBT+, Scottish Gypsy/Travellers, minority ethnic and religious communities in Scotland.¹² NIHRC noted that existing equality protections did not have similar legal protection across the United Kingdom.¹³
6. EHRC noted that people from certain ethnic minority groups were more likely to be subject of policing such as “stop and search” in England and Wales.¹⁴ EHRC recommended that United Kingdom develop guidelines with specific standards for the prevention of racial profiling.¹⁵ EHRC reported that people from ethnic minorities were overrepresented in prison.¹⁶ SHRC noted that prison populations in Scotland had increase significantly.¹⁷ EHRC recommended that the United Kingdom invest in appropriate alternatives to imprisonment and address the causes of disproportionate number of people from ethnic minorities in prisons.¹⁸
7. SHRC recommended that Scotland strengthen administrative and judicial routes to accessible, affordable, timely and effective remedies.¹⁹ NIHRC was concerned about the Secretary of State for Northern Ireland (NI) proposals to address the legacy of the past.²⁰ NIHRC recommended that the United Kingdom does not impose a statute of limitations restricting the investigation and prosecution of alleged unlawful killings.²¹
8. EHRC noted that new technologies posed challenges to human rights such as the right to privacy; for instance, automated facial recognition technology had been shown to disproportionately misidentify Black people and women.²²
9. NIHRC recommended that the United Kingdom repeal all legal provisions permitting the marriage of children in NI and increase the minimum age for marriage to 18 years.²³
10. EHRC recommended that the United Kingdom improve the employment protections available to people in insecure work, including by increasing access to statutory sick pay, and fund enforcement bodies.²⁴ SHRC noted that pay gaps based on gender, race and disability persisted in Scotland.²⁵
11. EHRC observed that changes to social security made since 2010, including changes to Universal Credit and child benefit payments had a disproportionately negative impact on certain ethnic minorities, disabled people, and women.²⁶
12. EHRC noted that poverty had disproportionately affected some ethnic minorities in lower-paid employments.²⁷ NIHRC recommended that the NI Government introduce without delay the Anti-Poverty Strategy.²⁸ SHRC recommended that Scotland prioritise delivery of affordable, accessible, and culturally appropriate social housing.²⁹
13. EHRC was concerned about waiting times for treatments and inequality of accessing health care in England.³⁰ SHRC reported problems on access to health care for LGBT+ people.³¹ EHRC and SHRC raised concern about problems with mental health.³² NIHRC recommended that the Secretary of State of NI take the legislative action to ensure the implementation of abortion services.³³
14. EHRC recommended that the United Kingdom increase efforts to tackle gaps in educational attainment across protected characteristic groups.³⁴ SHRC recommended that Scotland intensify efforts to tackle bullying and violence in schools and online.³⁵
15. SHRC welcomed the Scottish Government’s commitment to include the right to a Healthy Environment within Scotland’s forthcoming human rights legislation but noted that the legal system remained noncompliant with the Aarhus Convention and climate change risks had increased.³⁶
16. EHRC noted that domestic abuse and sexual violence were under-reported, and the pandemic had exacerbated the long-term trend in falling prosecutions for domestic abuse. The Domestic Abuse Act 2021 had introduced positive reforms, but some gaps remained.³⁷ SHRC recommended that Scotland strengthen efforts to combat violence against all women and LGBT+ people.³⁸
17. EHRC recommended that the United Kingdom raise the age of criminal responsibility to at least 14.³⁹ NIHRC recommended that the NI Government introduce legislation to repeal the defence of reasonable chastisement of a child.⁴⁰

18. SHRC recommended that Scotland ensure people with learning disabilities or autism can live independently with dignity.⁴¹

19. SHRC reported the fear of homophobia, biphobia, and transphobia in Scotland.⁴² NIHRC recommended that the United Kingdom introduce legislation to ban all practices of conversion therapy.⁴³

20. SHRC was concerned about the excessive length of immigration detention.⁴⁴ EHRC and SHRC recommended that the United Kingdom introduce a time limit on immigration detention.⁴⁵

III. Information provided by other stakeholders

A. Scope of international obligations⁴⁶ and cooperation with human rights mechanisms

21. JS5 and JS18 recommended that the United Kingdom ratify ICRMW.⁴⁷ Reprieve and JS18 recommended the ratification of ICPPED.⁴⁸ HRW, JS2 and JS18 recommended the ratification of OP-ICESCR.⁴⁹ Redress and JS18 recommended the ratification of ICCPR-OP 1.⁵⁰ Reprieve and JS18 recommended the ratification of OP-CEDAW.⁵¹ Reprieve, JS5, JS18 and JS19 recommended the ratification of OP-CRC-IC.⁵² Redress, Reprieve and JS5 recommended that the United Kingdom make a declaration under Article 22 of CAT.⁵³ JS5 recommended to withdraw the reservation to Article 4 of ICERD.⁵⁴

22. HRW, US, JS4 and JS18 recommended the ratification of the Istanbul Convention.⁵⁵ JS12 recommended the ratification of ILO Convention 189 (2011) on Decent Work for Domestic Workers.⁵⁶

23. CFoIS recommended that the United Kingdom send pending reports to UN Treaty Bodies.⁵⁷

B. National human rights framework

1. Constitutional and legislative framework

24. Several submissions expressed concerns by the plan of the United Kingdom government to replace the Human Rights Act 1998 (HRA), which incorporates the European Convention on Human Rights, with a Bill of Rights that would reduce human rights protection.⁵⁸ Several submissions raised different concerns regarding the draft bill itself and the process of stakeholder consultations. It was noted that the changes will restrict access to justice since the claimants would have to establish a “significant disadvantage”, before bring a case involving human rights violations to court, which can deny redress.⁵⁹ It will create a potential divergence with international obligations, given that domestic judges will not necessarily interpret the norms and international standards in accordance with the jurisprudence from the European Court of Human Rights.⁶⁰ It will potentially be a removal of the public authority’s duty to protect and secure human rights, since public authorities which are normally held legally accountable for that, will have a reduction of that accountability.⁶¹ Some submissions noted that the change will also include a democratic shield for Parliament when the country must face adverse international judgements.⁶² Some submissions informed that the change will also curtail the ability of people facing deportation to rely on human rights arguments.⁶³ Other submissions questioned the process of consultation launched by the government, which was considered of a highly divisive nature, or for instance, inaccessible to persons with disabilities.⁶⁴ HRCNI recommended that the United Kingdom ensure that any possible reform of the 1998 Human Rights Act has no impact on the scope of protection or access to the remedies currently enjoyed under the European Convention on Human Rights.⁶⁵ Several submissions make a similar recommendation.⁶⁶

25. Several submissions stated that these changes to the Human Rights Act 1998 will violate the Belfast/Good Friday Agreement of 1998 in Northern Ireland, undermine the political and policing structures, and jeopardize peace in the region.⁶⁷

26. HRCNI affirmed that for twenty-four years, the United Kingdom government had failed to deliver the Bill of Rights for Northern Ireland.⁶⁸ HRCNI recommended that the United Kingdom ensure that a distinct Bill of Rights for Northern Ireland is developed through Westminster legislation without further delay in accordance with the Belfast /Good Friday Agreement.⁶⁹

27. Shelter Scotland, JS8 and JS18 referred to the legal difficulties for the incorporation of CRC, and other international treaties as a part of a new Human Rights Bill for Scotland.⁷⁰ JS8 recommended that Scotland continue incorporating international treaties, through the new Human Rights Bill for Scotland and commit to enforceable and accessible remedies as part of this process.⁷¹

28. HRW stated the United Kingdom had consistently failed to fully incorporate the ICESCR treaty into domestic law and give an effective remedy at domestic level.⁷²

2. Institutional infrastructure and policy measures

29. DPAC and IHRC were concerned about the budget cut and the political board appointment in the EHRC.⁷³ JS10 recommended that the United Kingdom ensure the financial and political independence of the EHRC.⁷⁴ CFoIS, JS8 and JS18 asked for more power and resources for the SHRC.⁷⁵ JS15 noted at one decade of budget cuts of the NIHRC had led to review of the Subcommittee on the Accreditation of the Grand Alliance of National Human Rights Institutions.⁷⁶ HRCNI recommended that the United Kingdom ensure adequate and sustainable funding to the NHIRC to a level in compliance with ‘A’ status of the Paris Principles.⁷⁷

30. JS18 informed that there was no national action plan on human rights at United Kingdom level and noted good progress of Scotland’s National Action Plan on Human Rights but indicated that it still needed adequate Government leadership and resourcing.⁷⁸ The Alliance saw as a positive development Scotland’s second National Plan for Human Rights.⁷⁹

31. The Alliance stated that the United Kingdom’s withdrawal from the European Union had impacted social care organisations, worsening their ability to fill vacancies in Scotland.⁸⁰ JS2 noted that the protection of the Charter of Fundamental Rights, reflecting the indivisibility of civil, political, economic, and social rights had already been lost after Brexit.⁸¹ JS2, recommended that the United Kingdom ensure that human rights and equality standards are built upon and increased rather than regressed as the country charts its future outside the European Union.⁸² HRCNI recommended that the United Kingdom ensure that any review of retained EU law retains existing standards of protections and that equality and rights protections in Northern Ireland keep pace with emerging developments within the EU to help maintain comparable rights protections.⁸³

C. Promotion and protection of human rights

1. Implementation of international human rights obligations, taking into account applicable international humanitarian law

Equality and non-discrimination

32. JS5 and AI were concerned about the denial of institutional racism, after the 2021 report of the newly established Commission on Race and Ethnic Disparities.⁸⁴ DPAC and LFHR noted the failures to introduce anti-racist measures.⁸⁵ JS18 informed about lack of recognition of systematic racism in Scotland.⁸⁶ JS2 referred to the situation for young people in NI.⁸⁷ JS2 stated that the existing equality and non-discrimination statutory protection must be extended to adequately cover socio-economic equalities.⁸⁸ NSS raised the issue of discrimination on grounds of caste.⁸⁹ JS19 reported that black and other minority ethnic children continued to face significant discrimination.⁹⁰

33. REF, ODVV, JS5 noted that racially motivated hate crimes had increased.⁹¹ JS8 and JS18 referred to hate crime in Scotland, recognizing some advances.⁹²

Right to life, liberty and security of person, and freedom from torture

34. JS6 stated that the United Kingdom's policy and practice of nuclear deterrence were not in conformity with international human rights law, including the interpretation of the UN Human Rights Committee in its General Comment 36 on the right to life.⁹³ ICAN noted that the main concern from nuclear weapons attacks was the right to life, but it also can affect the right to health, to a clean environment, among others.⁹⁴

35. Redress, AI, JS19 were concerned for the use of equipment and technologies by police such as spit hoods, PAVA, spray, Taser.⁹⁵ ODVV reported discrimination in their use, affecting black and Asian people.⁹⁶ JS19 questioned "strip-searching" in police stations.⁹⁷ NIYF and JS21 denounced stop and search by the Police Service of Northern Ireland.⁹⁸ Reprieve was concerned about the use of lethal targeting and drones outside armed conflicts.⁹⁹ AI recommended that the United Kingdom take meaningful action to eliminate racism in police use of force, including in the use of Taser and to strengthen guidance on Taser.¹⁰⁰

36. Reprieve stated that the United Kingdom failed to investigate involvement of torture through intelligence sharing.¹⁰¹ JS8 noted that Scotland failed to protect from torture.¹⁰²

37. In 2019, CoE-CPT noted that local male prisons remained violent, unsafe, and overcrowded.¹⁰³ In Scotland, CoE-CPT found inter-prisoner violence and overcrowding and problems with the treatment of women prisoners.¹⁰⁴ JS5 was concerned about overcrowding, suicides, and self-harm in prisons.¹⁰⁵ JS5 noted that the Prison Strategy White Paper (2021) had addressed the need for new prisons, but not concrete plans of renovation.¹⁰⁶ HLPR was concerned about solitary confinement in prisons during Covid-19 and that racial inequality remained in prisons.¹⁰⁷ PPFW, FWS and NONE expressed concern about problems with transgender inmates in prisons for women.¹⁰⁸

Human rights and counter-terrorism

38. AI noted the draconian measures introduced by the Counter-Terrorism and Border Act 2018, affecting the rights to privacy, liberty and security or freedom of expression.¹⁰⁹ CRIN added that the Prevent Strategy undermined children's rights.¹¹⁰ IHRC noted that it was used to target faith communities, particularly Muslims.¹¹¹ JS9 was concerned about the public consultations on the proposed "Protect Duty" legislation, which could affect faith communities.¹¹²

Administration of justice, including impunity, and the rule of law

39. LSEW noted that judicial review gives to individuals the possibility to challenge a decision of a public bodies. LSEW was concerned that the Judicial Review and Courts Bill would weaken the accountability.¹¹³

40. RFJ and JS15 noted that the Stormont House Agreement had been eroded.¹¹⁴ RSI, RFJ, JS15 informed that the Parliamentary Command Paper "Addressing the legacy of Northern Ireland's past" (July 2021) which would amount to a de facto amnesty for all Troubles-related offences in NI and will lead to impunity.¹¹⁵ RSI and RFJ noted the trauma suffered by the victims caused by the delay in finding out the truth of what happened during the period known as the "troubles".¹¹⁶

41. JS22 referred to tax abuse, corporate tax avoidance and corruption in the United Kingdom.¹¹⁷

Fundamental freedoms and the right to participate in public and political life

42. ADF was concerned about freedom of expression in public spaces in NI.¹¹⁸ HUK noted with concern that blasphemy was a criminal offence in NI.¹¹⁹ JS9 noted that Antisemitism and Islamophobia were growing issues across the United Kingdom.¹²⁰ IHRC was concerned about the Islamophobic narrative.¹²¹

43. CIVICUS was concerned about media independence after the BBC funding announcement.¹²² CIVICUS recommended that the United Kingdom retain the BBC's licensing model, which enables it to operate independently.¹²³

44. AI affirmed that the Police, Crime, Sentencing and Courts Bill may unduly restrict the right to peaceful assembly and recommended that the United Kingdom repeal Part 3 (Public Order).¹²⁴ ICTUR recommended that the United Kingdom repeal the Trade Union Act 2016.¹²⁵

45. CIVICUS and JS20 were concerned about harassment of civil society organizations on racial justice and environmental groups.¹²⁶ CFoIS was concerned about legal threats and strategic lawsuits against journalists and NGOs in Scotland.¹²⁷

46. CIVICUS was concerned over the Election Bill introduced in 2021.¹²⁸ JS1 was concerned about changes in the electoral law.¹²⁹ OSCE-ODIHR recommended that the United Kingdom consider establishing annual limits on the amount a single permissible donor may contribute to a political party or a candidate.¹³⁰

Right to privacy

47. SBC referred to the use of biometric technology and biometric data, which could raise a range of legal, ethical, and human rights challenges.¹³¹

Right to marriage and family life

48. HUK noted that humanist marriages had been legally recognised in Scotland and in Northern Ireland, but not in England and Wales.¹³²

Prohibition of all forms of slavery, including trafficking in persons

49. Reprieve indicated that the United Kingdom should identify victims of trafficking.¹³³ JS17 referred that people exploited through sex trade were women and girls.¹³⁴ The Group of Experts on Action against Trafficking in Human Beings (CoE- GRETA) welcomed reforms made to the National Referral Mechanism, the increase in investigations and prosecutions, and the rolling out of the Independent Child Trafficking Guardians scheme. However, CoE-GRETA noted that the number of potential victims had increased. CoE-GRETA urged the United Kingdom to strengthen the systematic provision of information to potential victims of trafficking regarding their rights; to ensure that victims receive legal assistance; guarantee timely access to psychological assistance; and to take further steps to improve the identification of victims of trafficking.¹³⁵

50. AI noted that the National and Border Bill contained measures to restrict protection and support for victims of modern-day slavery.¹³⁶

Right to work and to just and favourable conditions of work

51. JS11 reported that the United Kingdom had one of the poorest resourced labour inspectorates in Europe.¹³⁷ PFPW noted that the pay gap and discrimination was aggravated by the lack of data recording biological sex.¹³⁸ NIWEP referred to the outstanding pay gap in NI.¹³⁹ JS18 noted the wider pay gap in black and minority ethnic women.¹⁴⁰

52. HUK observed employment discrimination in religious designated schools.¹⁴¹ JS11 reported the vulnerability of domestic and seasonal workers.¹⁴² JS1 noted the necessity to reform electoral law to permit job sharing, which could further enable persons with disability to stand for elected office.¹⁴³ NIWEP noted problems with frontier worker permit in NI after Brexit.¹⁴⁴

Right to social security

53. HRW, NIWEP, ODVV and JS2 expressed concern for the cut the increase to Universal Credit, and the impact on poverty.¹⁴⁵ CYPCS noted poverty in children¹⁴⁶; meanwhile LFHR reported about the effect on persons with disabilities.¹⁴⁷

54. Mind was concerned about longstanding issues with Social Security affecting people with mental health problems.¹⁴⁸ JS2 noted the forthcoming raise in national insurance contribution and the negative effects of the no recourse to public funds for migrants.¹⁴⁹

Right to an adequate standard of living

55. In the context of an increase in the cost of living¹⁵⁰, HRW noted the lack of a comprehensive strategy to tackle poverty.¹⁵¹ JS19 and CYPSC referred to child poverty in England and Scotland.¹⁵² JS21 was concerned about poverty for young people in NI.¹⁵³ HRW recommended that the United Kingdom develop a comprehensive nationwide anti-poverty strategy, including a specific child poverty strategy.¹⁵⁴ HRW affirmed that the United Kingdom was relying on emergency food aid in many areas.¹⁵⁵ HRW recommended that the United Kingdom enshrine the right to food and the right to housing in domestic law as specific enforceable rights, and as part of the human right to an adequate standard of living.¹⁵⁶

56. AI and JS19 noted a significant development in law, policy, and practice in terms of housing and homelessness, but noted that problems had persisted for local authorities.¹⁵⁷ JS3, NIYF, JS21 reported challenges with homelessness, temporary accommodation and housing waiting list in NI.¹⁵⁸ Shelter Scotland and JS18 raised similar concerns in Scotland.¹⁵⁹ JS3 recommended that Northern Ireland increase the supply of safe, secure, and affordable housing.¹⁶⁰

Right to health

57. PFW and JS7 noted the lack of progress in access to health services for women.¹⁶¹ Similar concerns were expressed by RCUK regarding asylum seekers.¹⁶² CYPSC noted the problem of the waiting lists affecting children in Scotland.¹⁶³ ASUK noted that people with dementia became worst with the negative effects of Covid-19 and questioned “Do Not Attempt Cardiopulmonary Resuscitation Orders” and the restrictions in care homes.¹⁶⁴

58. LFHR, MIND, JS19 referred to different problems with mental health service and the negative impact of Covid-19.¹⁶⁵ CYPSC, the Alliance, JS8 and JS18 raised similar difficulties in Scotland.¹⁶⁶ NIYF and JS21 referred to mental health in young people in NI.¹⁶⁷

59. AI, HRW, ECLJ, NIWEP and JS4 were concerned for the lack of implementation of Abortion (Northern Ireland) Regulations 2020, despite the directives adopted in 2021. JS4 recommended that the United Kingdom ensure that abortion is equally available and accessible across NI on all permitted grounds through sufficient staffing and funding of all HSC Trusts.¹⁶⁸

Right to education

60. NSS and HUK informed about discrimination on ground of religion due to prevalence of State funded faith schools.¹⁶⁹ HUK was concerned by the requirement for Christian collective worship in state schools.¹⁷⁰ JS18 noted that pupils did not have the possibility to withdraw from religious observance in Scotland.¹⁷¹ ADF and HUK referred that sexual and relationships education was compulsory in Wales.¹⁷² JS21 and NIYF noted the lack of choice in terms of types of education in NI.¹⁷³

61. CYPSC reported on the problem of quality education in Scotland and affirmed that education was affected by Covid-19 through closures and online learning.¹⁷⁴ JS21 raised similar concerns in NI.¹⁷⁵ JS13 referred to education inequalities affecting Gypsies, Roma, and Travellers.¹⁷⁶ BCN and JS19 referred to problems such as, the lack of free lunch at the school and school exclusions.¹⁷⁷

62. BCN affirmed that access to university was hinged heavily upon socioeconomic background, the school attended and the geographical location.¹⁷⁸

Development, the environment, and business and human rights

63. JS18 recommended that Scotland put the right to a healthy environment into law by 2025.¹⁷⁹ JS20 reported that the proposed goldmine near to the village of Greencastle in NI threatened the way of life, pollution of water and air and the health of children.¹⁸⁰

64. CAPCS affirmed that climate change had affected children's lives in Scotland.¹⁸¹ The Alliance noted similar concerns regarding persons with disabilities in Scotland.¹⁸² NIYF and JS21 called on NI to act on climate change.¹⁸³ JS6 referred to the negative impact of the use of nuclear weapons on climate change.¹⁸⁴

65. AI noted that the United Kingdom strategy export control system remained concerning, particularly regarding military and security equipment.¹⁸⁵ HRW raised similar concern regarding the regulation of corporate conduct. JS11 recommended that the United Kingdom commit and implement a Business, Human Rights and Environment Act.¹⁸⁶ CFoIS recommended that Scotland deliver the Guiding Principles on Business and Human Rights through a transparent and accountable framework.¹⁸⁷

2. Rights of specific persons or groups

Women

66. NIWEP affirmed that no meaningful action had been taken on gender equality in NI.¹⁸⁸

67. HRW noted that domestic violence had increased during the Covid-19 pandemic.¹⁸⁹ JS4 noted that Covid-19 had been disastrous for those suffering from domestic abuse.¹⁹⁰ AI and HRW and RCUK reported that the Domestic Abuse Act (2021) did not provide key protection for migrant women.¹⁹¹ JS4 noted that the Act was only in force in England and Wales.¹⁹² HRW recommended that the United Kingdom revise the Domestic Abuse Act to ensure protection and support for migrant women, including those with No Recourse to Public Funds.¹⁹³ FWS informed about violence against women in Scotland.¹⁹⁴

68. PPFW and JS7 noted that data collection on sex was being undermined due to sex being replaced with self-identity gender.¹⁹⁵ JS7 noted that the lack of recording of biological sex was a concern, and it reduced the likelihood that equality for women can be achieved.¹⁹⁶ FWS stated that the Gender Recognition Act Reformed in Scotland was affecting women from minority ethnic and religious groups regarding spaces based on biological sex groups. It noted that housing inmates based on self-defined gender identity was affecting female prisoners.¹⁹⁷ FWS recommended that Scotland accommodate inmates in prisons by sex, not gender identity, and provide accommodation for transgender inmates within single-sex prison facilities or in separate sites.¹⁹⁸

Children

69. The Commissioner for Human Rights of the Council of Europe (CoE-Commissioner), JS5, JS18 and JS19 were concerned about the age of criminal responsibility of 10 years old (12 years old in Scotland), below the absolute minimum requested internationally of 14 years old.¹⁹⁹ HLPR noted racial inequalities in the criminal justice system, particularly in youth custody.²⁰⁰

70. CRIN and JS19 were concerned about the recruitment of children -16 years old-, by the United Kingdom forces.²⁰¹ CRIN recommended that the United Kingdom remove its interpretative declaration on article 1 of OP-CRC-AC.²⁰²

71. JS16 referred to the barriers of some children accessing nationality.²⁰³ NIYF asked for a Minister of Youth in NI.²⁰⁴ JS19 recommended the development of a child rights action plan in consultation with stakeholders.²⁰⁵

Persons with disabilities

72. DPAC and JS18 reported that deaf and in general, persons with disabilities were affected by the governmental response to Covid-19.²⁰⁶ The Alliance affirmed that young people with multiple learning disabilities had limited access to education in Scotland.²⁰⁷ JS21 referred to similar problems for disabled young people in NI.²⁰⁸ JS18 noted that persons with learning disabilities were living in a hospital setting without clinical need in Scotland.²⁰⁹ LFHR was concerned about the government's new National Disability Strategy.²¹⁰

73. DSUO and ECLJ referred to the Non-Invasive Prenatal Test (NIPT) provided by the National Health Service and offered to all pregnant women that could detect if a foetus had Downs syndrome, which often resulted in the termination of the unborn baby's life. They

noted that the Abortion Act permits abortion after twenty-four weeks in cases of “seriously handicapped” which had created further discrimination against persons with disabilities.²¹¹ DSUO recommended that the United Kingdom review the Abortion Act 1967 (Section (1)(d) and reduce the elements which were discriminatory to ensure non-discrimination against persons with disabilities.²¹²

Indigenous peoples and minorities

74. JS13 observed no progress in the strategy to address inequalities experienced by Gypsies, Roma, and Travellers communities and the national shortage of culturally appropriate accommodations for Gypsies and Travellers, despite the Planning Policy for Travellers Sites.²¹³ JS13 recognized positive steps taken by the Government, but informed that Gypsies, Roma, and Travellers continued to experience barriers in accessing health care and education.²¹⁴ REF noted that Gypsies, Roma, and Travellers experienced hate speech due to the stigmatization in the media.²¹⁵ HLPR reported that Gypsies, Roma and Travellers were overrepresented in youth custody and the wider criminal justice system.²¹⁶

75. JS13 recommended that the United Kingdom withdraw Part 4 of the Police, Crime, Sentencing and Courts Bill which relates to the criminalisation of trespass and strengthening of police powers.²¹⁷ JS13 recommended that the United Kingdom include robust measures to tackle anti-Gypsyism into in next Hate Crime Action Plan, and a strand on addressing anti-Gypsy, Roma, and Traveller racism in the media.²¹⁸ The Committee of Ministers (CoE-CM) recommended that the United Kingdom collect disaggregated data on Gypsies, Travellers and Roma; monitor the measures to guarantee equal access to education; and intensify targeted initiatives to maximise participation of persons belonging to national and ethnic minorities in employment.²¹⁹

Lesbian, gay, bisexual, transgender and intersex persons

76. JS10, LFHR and DPAC were concerned about the deterioration of the situation of LGBTIQI, especially for transgender in healthcare, schools, privacy, among other rights.²²⁰ JS18 referred to the concerns in Scotland.²²¹ JS21 reported about inequality and exclusion in NI.²²²

77. JS10 and NIWEP were concerned with the increase of transphobia hate crimes.²²³ NONE was concerned about the definition of “transphobic”.²²⁴ JS4 and Redress referred to domestic abuse, including affecting trans women.²²⁵

78. AI, JS10 asked for change of the Gender Recognition Act (2004) and, for instance, they affirmed that the Gender Recognition Certificate was highly medicalised.²²⁶ LGB Alliance noted that the gender identify theory affected the rights of LGB people.²²⁷

79. JS10 affirmed that the United Kingdom failed to enact its 2018 LGBT Action Plan and the ban on conversion therapy.²²⁸ JS18 noted that conversion therapies harmed LGBTI people in Scotland.²²⁹ JS9 noted areas of ambiguity in the consultation process regarding conversion therapy.²³⁰ JS10 recommended that the United Kingdom pass legislation to ban all practices that have the predetermined outcome to change, “cure”, or suppress an individual or group of individual’s sexual orientation or gender identity.²³¹

Migrants, refugees and asylum-seekers

80. Several submissions stated that the Nationality and Borders Bill conflicted with the United Kingdom’s international obligations, including the UN Convention relating to the Status of Refugees and its 1967 Protocol.²³² It was noted that the Bill limited access to protection to refugees and asylum-seekers; increased the risks of returns; facilitated offshore asylum centres; increased sentences for illegal entry; created a two tier system with different treatment based on mode of arrival to the country; granted immunity to officers involved among others.²³³ US, JS9, JS16 and JS23 also were concerned by the clauses 9 and 10 about further power to deprive citizenship.²³⁴ HRW recommended that the United Kingdom respect the principle of *non-refoulement*, prohibition on collective expulsion, duty to rescue persons in distress at sea, and the rights of individuals to leave any country and to seek and enjoy asylum.²³⁵

81. BID, RCUK, JS3, JS5; and JS18 reported that there was no statutory time limit on immigration detention.²³⁶ HRW recommended that the United Kingdom establish a clear time limit on the length of immigration detention and take urgent steps to implement long-term alternatives to detention.²³⁷ Redress reported about poor conditions and poor treatment in immigration detention facilities.²³⁸ BID stated that the electronic monitoring of people on immigration bail was contrary to data protection laws.²³⁹ JS11 noted a significant increase in the number of survivors of trafficking held in immigration detention centres.²⁴⁰

82. FFT, ODVV and JS9 were concerned about dangerous crossings in the English Channel and the plan for pushbacks.²⁴¹ In 2021, the Commissioner for Human Rights of the Council of Europe (CoE-Commissioner) asked for cooperation between the two countries involved to ensure access to asylum and effective coordination of rescue at sea.²⁴² HRW recommended that the United Kingdom not engage in any practice that has the effect of undermining access to asylum in the UK, endangering life or penalizing asylum-seekers for seeking asylum, including through pushbacks, offshore detention and criminal offences.²⁴³

83. FFT, JS3 and JS9 were concerned by the known “Windrush scandal” where British Caribbean citizens were wrongly detained and deported.²⁴⁴ JS3 reported that the current asylum process in the United Kingdom was under-resourced and overwhelmed.²⁴⁵

Stateless persons

84. JS16 observed problems with the definition of a stateless person, the lack of accurate data on the stateless population, and with the stateless determination procedure.²⁴⁶ JS16 recommended that the United Kingdom comply with the 1954 Convention, including recognising ‘statelessness status’ as a protection status, ensuring that its definition of ‘stateless person’ is fully consistent with the 1954 Convention; and introduce adequate procedural safeguards during the statelessness determination procedure.²⁴⁷ JS23 and JS16 were concerned by the executive powers to deprive nationality on the ground of national security and its negative impacts.²⁴⁸

85. EVACH recommended that England and Wales prohibit all corporal punishment of children in every setting of their lives, repealing Section 58 of Children Act 2004 (England) and Art 2 of the Law Reform Order 2006 (NI).²⁴⁹

Notes

¹ The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: www.ohchr.org (one asterisk denotes a national human rights institution with “A” status).

Civil society

Individual and Joint submissions:

ADF	ADF International (Switzerland);
AI	Amnesty International (United Kingdom of Great Britain and Northern Ireland);
ASUK	Alzheimer’s Society (United Kingdom of Great Britain and Northern Ireland);
BCN	Broken Chalk (The Netherlands);
BID	Bail for Immigration Detainees (United Kingdom of Great Britain and Northern Ireland);
CFoIS	Campaign for Freedom of Information in Scotland (United Kingdom of Great Britain and Northern Ireland);
CIVICUS	World Alliance for Citizen Participation (South Africa);
CRIN	Child Rights International Network (United Kingdom of Great Britain and Northern Ireland);
CYPCS	Commissioner for Children and Young People Scotland (United Kingdom of Great Britain and Northern Ireland);
DPAC	Disabled People Against Cuts (United Kingdom of Great Britain and Northern Ireland);
DSUO	Don’t Screen Us Out (United Kingdom of Great Britain and Northern Ireland);
ECLJ	European Centre for Law and Justice (France);
EVACH	End Violence Against Children (United States of America);

FFT	Freedom From Torture (United Kingdom of Great Britain and Northern Ireland);
PPFW	Fair Play for Women (United Kingdom of Great Britain and Northern Ireland);
FWS	For Women Scotland (United Kingdom of Great Britain and Northern Ireland);
HLPR	Howard League for Penal Reform (United Kingdom of Great Britain and Northern Ireland);
HRW	Human Rights Watch (Switzerland);
HRCNI	Human Rights Consortium (Northern Ireland);
HUK	Humanists (United Kingdom of Great Britain and Northern Ireland);
ICAN	International Campaign to Abolish Nuclear Weapons (Switzerland);
ICTUR	International Centre for Trade Union Rights (United Kingdom of Great Britain and Northern Ireland);
IHRC	The Islamic Human Rights Commission (United Kingdom of Great Britain and Northern Ireland);
LFHR	Liberation for Full Human Rights (United Kingdom of Great Britain and Northern Ireland);
LGB Alliance	LGB Alliance (United Kingdom of Great Britain and Northern Ireland);
LSEW	The Law Society (United Kingdom of Great Britain and Northern Ireland);
MIND	MIND (United Kingdom of Great Britain and Northern Ireland);
NIWEP	Northern Ireland Women's European Platform (United Kingdom of Great Britain and Northern Ireland);
NIYF	The Northern Ireland Youth Forum (United Kingdom of Great Britain and Northern Ireland);
NONE	Transgender Trend (United Kingdom of Great Britain and Northern Ireland);
NSS	National Secular Society (United Kingdom of Great Britain and Northern Ireland);
OBJECT	OBJECT (United Kingdom of Great Britain and Northern Ireland);
ODVV	Organization for Defending Victims of Violence (Iran);
RCUK	The Refugee Council (United Kingdom of Great Britain and Northern Ireland);
REDRESS	REDRESS (United Kingdom of Great Britain and Northern Ireland);
REF	Race Equality First (United Kingdom of Great Britain and Northern Ireland);
REPRIEVE	REPRIEVE (United Kingdom of Great Britain and Northern Ireland);
RFJ	Relatives for Justice (United Kingdom of Great Britain and Northern Ireland);
RSI	Rights and Security International (United Kingdom of Great Britain and Northern Ireland);
SBC	Scottish Biometrics Commissioner (United Kingdom of Great Britain and Northern Ireland);
Shelter Scotland	Shelter Scotland (United Kingdom of Great Britain and Northern Ireland);
The Alliance	Health and Social Care Alliance Scotland (United Kingdom of Great Britain and Northern Ireland);
US	United Sikhs (United Kingdom of Great Britain and Northern Ireland).

Joint submissions:

JS1	Joint submission 1 submitted by: Disability Politics UK Fawcett Society (United Kingdom of Great Britain and Northern Ireland);
JS2	Joint submission 2 submitted by: Just Fair and Project 17 (United Kingdom of Great Britain and Northern Ireland);

- JS3 **Joint submission 3 submitted by:** Edmund Rice International International Presentation Association Westcourt Centre Homeless Connect Revive UK Caritas Shrewsbury Asylum Link Merseyside Red Dot Foundation European Province of the Christian Brothers (Switzerland);
- JS4 **Joint submission 4 submitted by:** The UPR Project at BCU Pace University (United Kingdom of Great Britain and Northern Ireland);
- JS5 **Joint submission 5 submitted by:** BCU Centre for Human Rights 4 King's Bench Walk (United Kingdom of Great Britain and Northern Ireland);
- JS6 **Joint submission 6 submitted by:** Abolition 2000 UK, Aotearoa Lawyers for Peace, Association of Swiss Lawyers for Nuclear Disarmament, Basel Peace Office, Bertrand Russell Peace Foundation, Christian CND, CND Cymru (Wales), International Association of Lawyers Against Nuclear Arms, International Forum for Understanding, Legacy of the Atomic Bomb/Recognition for Atomic Test Survivors (LABRATS), Nuclear Free Local Authorities, Pax Christi Scotland, Scientists for Global Responsibility, Sheffield Creative Action for Peace, Uniting for Peace, Westminster West Rotary Club Peace Committee, Youth Fusion, World Future Council and 80,000 Voices. (Switzerland);
- JS7 **Joint submission 7 submitted by:** Women's Rights Network Liberal Voice for Women (United Kingdom of Great Britain and Northern Ireland);
- JS8 **Joint submission 8 submitted by:** The Scottish Commission for People with Learning Disabilities (SCLD) Values into Action Scotland (VIAS) (United Kingdom of Great Britain and Northern Ireland);
- JS9 **Joint submission 9 submitted by:** Baptist Union of Great Britain (BUBG or Baptists Together) Baptist Union of Wales (BUW) (The Netherlands);
- JS10 **Joint submission 10 submitted by:** Mermaids and Stonewall (United Kingdom of Great Britain and Northern Ireland);
- JS11 **Joint submission 11 submitted by:** Focus on Labour Exploitation (FLEX); Helen Bamber Foundation; Anti-Slavery International; Kalayaan; Hope For Justice; Anti-Trafficking and Labour Exploitation Unit (ATLEU); Love146; JustRight Scotland; Unite the Union; Survivor Alliance; Kanlungan; Medical Justice; Anti-Trafficking Monitoring Group; Latin American Women's Rights Service (LAWRS); Unseen; Labour Exploitation Advisory Group (LEAG); Taskforce on Victims of Trafficking in Immigration Detention (United Kingdom of Great Britain and Northern Ireland);
- JS12 **Joint submission 12 submitted by:** Anti-Slavery International Focus on Labour Exploitation Kalayaan Kanlungan Filipino Consortium The Voice of Domestic Workers (United Kingdom of Great Britain and Northern Ireland);
- JS13 **Joint submission 13 submitted by:** Friends, Families and Travellers Minority Rights Group International Roma Support Group Gypsy and Traveller Empowerment Hertfordshire (United Kingdom of Great Britain and Northern Ireland);
- JS14 **Joint submission 14 submitted by:** Anti Caste Discrimination Alliance, Federation of Ambedkarite and Buddhist Organisations UK, Ravidassia and Valmik organisations, Indian Workers Association GB (United Kingdom of Great Britain and Northern Ireland);
- JS15 **Joint submission 15 submitted by:** The Committee on the Administration of Justice (CAJ) is an independent human rights NGO with cross community membership in Northern Ireland and

- beyond. It was established in 1981, campaigns on a broad range of human rights issues and is a member of FIDH. (France);
- JS16 **Joint submission 16 submitted by:** Asylum Aid, Liverpool Law Clinic, Roma Support Group, the European Network on Statelessness, and the Institute on Statelessness and Inclusion (The Netherlands);
- JS17 **Joint submission 17 submitted by:** Coalition of Abolitionist Organisations - women@thewell, National Board of Catholic Women of England and Wales, National Alliance of Women's Organisations together with CAP International (United Kingdom of Great Britain and Northern Ireland).;
- JS18 **Joint submission 18 submitted by:** Human Rights Consortium Scotland (United Kingdom of Great Britain and Northern Ireland); A Way Home Scotland; Ability Borders SCIO; Action for ME; Advocard; Advocating Together; Advocacy North-East; Advocacy Western Isles; African and Caribbean Elders in Scotland (ACES); Age Scotland; Alcohol Focus Scotland; Amina -the Muslim Women Resource Centre; Amnesty International; Angus Independent Advocacy; ARC Scotland; Art27 CIC; Article 12; ASH Scotland; Autism Rights Group Highland; Because We Matter; BEMIS; Bridges Programme; British Institute of Human Rights; CAAG Poverty Alliance; Campaign for Freedom of Information in Scotland; Carr Gomm; C-Change Scotland; CEMVO Scotland; Central Scotland Regional Equality Council (CSREC); Children 1st; Children's Parliament; Circles Network; Citizens' Rights Project; CLAN Childlaw; Close the Gap; Clydebank Women's Aid; Coalition of Racial Equality & Rights (CRER); Community Enterprise Ltd; Connect Perth; Corra Foundation; Dalkeith & District Citizens Advice Bureau; Deaf Equality & Accessibility Forum South Lanarkshire; Deafblind Scotland; Disability Agenda Scotland; Disability Equality Scotland; Dumfries & Galloway Advocacy Service; Dundee Federation of Tenants' Associations; EachOther G3A; East And Southeast Asian Scotland; East Lothian Play Association; Edinburgh Development Group; ELREC; Empower Women for Change; Energy Action Scotland; Engender; Environmental Rights Centre for Scotland; Equality Network; Fareshare Scotland; Faith in Older People; Fife Centre for Equalities; Fife Migrants Forum; Forth Valley Advocacy; Forth Valley Migrants Support; Freedom from Torture Edinburgh Local Group; GCVS; Glasgow Community Food Network; Glasgow Disability Alliance; Global Justice Now; Headway East Lothian; Highland Migrant and Refugee Action (HiMRA); HIV Scotland; Homeless Action Scotland; Howard League Scotland; HUG (Action for Mental Health); Humanist Society Scotland; In Control Scotland; Include Me; Inclusion Scotland; Independent Advocacy Perth; Independent Age; The Usual Place; Inspiring Scotland; Interfaith Scotland; International Voluntary Service; Just Fair; Just Festival Edinburgh; Justice; JustRight Scotland; Lanarkshire Community Law Centre; LGBT Health and Wellbeing; LGBT Youth; Love @Care Ltd; Making Rights Real; Maryhill Integration Network; Media Education CIC; Mental Health Rights Scotland; Migrant Voice; Mongol Identity; Move On; Nourish Scotland; Outside the Box; Parent Advocacy and Rights; Patients' Advocacy Service; PKAVS Minority Communities Hub; Play Scotland; Positive Help; Positive Prisons; Poverty Alliance; Psychiatric Rights Scotland; Radiant and Brighter; Rape Crisis Scotland; Reach Advocacy; Realising Rights; Refugees for Justice; REH Patients Council; RNIB Scotland; Safe in Scotland; SCID; SCLD; Scotland's Learning; Scottish Arthritis Care; Scottish Association of Sign Language Interpreters; Scottish Association of Social Work; Scottish Borders Social Enterprise Chamber CIC; Scottish

	Care; Scottish CND; Scottish Community Development Network; Scottish Council of Jewish Communities; Scottish Mental Health Cooperative; Scottish Partnership for Palliative Care; Scottish Recovery Consortium; Scottish Refugee Council; Scottish Women's Aid; Scottish Women's Rights Centre; Scottish Youth Parliament; SCVO; Secure Scotland; Self-Directed Support Scotland; Shared Lives Plus; Scottish Independent Advocacy Alliance; Stonewall Scotland; Strathclyde Students' Union; STUC; Take Control South Lanarkshire; Health and Social Care Alliance Scotland; The Paristamen CIO; The Community Policy Forum; The Scottish Women's Convention; Third Generation Project; Together Scotland; UNICEF UK; Unison; United Nations Association Scotland; VOX Scotland; Welfare Scotland; West of Scotland Regional Equality Council; Who Cares? Scotland; Women for Independence; Y People; Youthlink Scotland; Zero Tolerance; The Bingham Centre; Grampain REC Ltd; Sikh Sanjog;
JS19	Joint submission 19 submitted by: Children's Rights Alliance for England Wales UNCRC Monitoring Group (United Kingdom of Great Britain and Northern Ireland);
JS20	Joint submission 20 submitted by: The Scottish Commission for People with Learning Disabilities (SCLD) Values into Action Scotland (VIAS) (United Kingdom of Great Britain and Northern Ireland);
JS21	Joint submission 21 submitted by: NI Youth Forum and associated project groups (United Kingdom of Great Britain and Northern Ireland);
JS22	Joint submission 22 submitted by: The Tax Justice Network and GRADE, Universities of St. Andrews and Leicester (United Kingdom of Great Britain and Northern Ireland);
JS23	Joint submission 23 submitted by: Rights & Security International, Institute of Statelessness and Inclusion (United Kingdom of Great Britain and Northern Ireland);
<i>National human rights institutions:</i>	
EHRC	Equality and Human Rights Commission;
SHRC	Scottish Human Rights Commission;
NIHRC	Northern Ireland Human Rights Commission.
<i>Regional intergovernmental organizations:</i>	
CoE	The Council of Europe, Strasbourg (France); Attachments: (CoE-Commissioner) Report by Mr. Dunja Mijatovic, Commissioner for Human Rights of the Council of Europe, Strasbourg, CommDH; (CoE-GRETA)-Group of Experts on Action against Trafficking in Human Beings, Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the United Kingdom of Great Britain and Northern Ireland, GRETA (2021) ¹² , published on 20 October 2021; (CoE-CPT) Report to the Government of the United Kingdom of Great Britain and Northern Ireland carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment from 13-23 May, 2019, CPT/Inf (2020) 18;
OSCE-ODIHR	Office for Democratic Institutions and Human Rights/Organisation for Security and Cooperation in Europe (Poland).

² See A/HRC/36/9; A/HRC/36/9/Add.1; and A/HRC/36/2.

³ SHRC, p. 5; NIHRC, p. 2.

⁴ EHRC, p. 6.

⁵ NIHRC, p. 6.

⁶ EHRC, p. 5; SHRC, p. 4; NIHRC, p. 1.

- 7 NIHRC, p. 1.
 8 SHRC, p. 5.
 9 EHRC, p. 6; NIHRC, p. 1.
 10 SHRC, p. 9; NIHRC, p. 1.
 11 SHRC, p. 8.
 12 SHRC, p. 10.
 13 NIHRC, p. 2.
 14 EHRC, p. 15.
 15 EHRC, p. 15.
 16 EHRC, p. 16.
 17 SHRC, p. 13.
 18 EHRC, p. 16.
 19 SHRC, p. 12.
 20 NIHRC, p. 3.
 21 NIHRC, p. 3.
 22 EHRC, p. 16.
 23 NIHRC, p. 4.
 24 EHRC, p. 12.
 25 SHRC, p. 20.
 26 EHRC, p. 7.
 27 EHRC, p. 7.
 28 NIHRC, p. 9.
 29 SHRC, p. 18.
 30 EHRC, p. 9.
 31 SHRC, p. 21.
 32 EHRC, p. 9; SHRC, p. 22.
 33 NIHRC, p. 7.
 34 EHRC, p. 11.
 35 SHRC, p. 19.
 36 SHRC, p. 24.
 37 EHRC, p. 14.
 38 SHRC, p. 11.
 39 EHRC, p. 16.
 40 NIHRC, p. 3.
 41 SHRC, p. 23.
 42 SHRC, p. 11.
 43 NIHRC, p. 5.
 44 SHRC, p. 13.
 45 EHRC, p. 17; SHRC, p. 14.

46 The following abbreviations are used in UPR documents:

ICERD	International Convention on the Elimination of All Forms of Racial Discrimination
ICESCR	International Covenant on Economic, Social and Cultural Rights
OP-ICESCR	Optional Protocol to ICESCR
ICCPR	International Covenant on Civil and Political Rights
ICCPR-OP 1	Optional Protocol to ICCPR
ICCPR-OP 2	Second Optional Protocol to ICCPR, aiming at the abolition of the death penalty
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
OP-CEDAW	Optional Protocol to CEDAW
CAT	Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
OP-CAT	Optional Protocol to CAT
CRC	Convention on the Rights of the Child
OP-CRC-AC	Optional Protocol to CRC on the involvement of children in armed conflict
OP-CRC-SC	Optional Protocol to CRC on the sale of children, child prostitution and child pornography
OP-CRC-IC	Optional Protocol to CRC on a communications procedure
ICRMW	International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families

CRPD	Convention on the Rights of Persons with Disabilities
OP-CRPD	Optional Protocol to CRPD
ICPPED	International Convention for the Protection of All Persons from Enforced Disappearance.

- 47 JS5, p. 4 and JS18, p. 2.
- 48 Reprieve, p. 8 and JS18, p. 2.
- 49 HRW, p. 6; JS2, p. 10; JS18, p. 2.
- 50 Redress, p. 3 and JS18, p. 2.
- 51 Reprieve, p. 4 and JS18, p. 2.
- 52 Reprieve, p. 4; JS5, p. 8; JS18, p. 2 and JS19, p. 2.
- 53 Redress, p. 3; Reprieve, p. 8; and JS5, p. 8.
- 54 JS5, p. 11.
- 55 HRW, p. 9; US, p. 5; JS4, p. 13; JS18, p. 2.
- 56 JS12, p. 5.
- 57 CFoIS, p. 3.
- 58 AI, p. 1; ASUK, p. 3; BID, p. 1; CIVICUS, p. 3; FFT, p. 3; HUK, p. 1; IHRC, p. 1; LFHR, p. 2; LSEW, p. 1; Redress, p. 2; REF, p. 1; RSI, p. 1; The Howard League, p. 5; JS2, p. 3; JS8, p. 2; JS9, p. 2; JS15, p. 1; HRCNI, p. 1; JS18, p. 1; JS19, p. 3.
- 59 BID, p. 1; CIVICUS, p. 3; DPAC, p. 1; FFT, p. 3; IHRC, p. 1; LSEW, p. 1; Redress, p. 2; RSI, p. 6; JS8, p. 2; JS18, p. 1.
- 60 AI, p. 1; LFHR, p. 2; DPAC, p. 1; HUK, p. 1; LSEW, p. 1; JS9, p. 2; HRCNI, p. 2; JS18, p. 1.
- 61 ASUK, p. 3; BID, p. 1; LSEW, p. 2; Redress, p. 2; JS9, p. 2; HRCNI, p. 2; JS18, p. 1.
- 62 AI, p. 1; HUK, p. 1.
- 63 BID, p. 2; FFT, p. 3; LFHR, p. 3; LSEW, p. 3.
- 64 REF, p. 2; JS2, p. 3.
- 65 HRCNI, p. 3.
- 66 AI, p. 4; AUK, p. 3; FFT, p. 6; LFHR, p. 3; LSEW, p. 6; Redress, p. 3; REF, p. 3; RSI, p. 7; JS2, p. 5; HRCNI, p. 3; JS18, p. 2; JS19, p. 3.
- 67 REF, p. 2; RSI, p. 1; JS15, p. 1; HRCNI, p. 2; JS21, p. 4.
- 68 HRCNI, p. 3. See also: Niwep, p. 1; NIYF, p. 1.
- 69 HRCNI, p. 4.
- 70 Shelter Scotland, p. 3; JS8, p. 3; JS18, p. 1.
- 71 JS8, p. 3.
- 72 HRW, p. 5. See also: JS2, p. 9; JS19, p. 3.
- 73 DPAC, p. 1; IHRC, p. 2.
- 74 JS10, p. 14.
- 75 CFoIS, p. 4; JS8, p. 4; JS18, p. 2.
- 76 JS15, p. 2.
- 77 HRCNI, p. 5.
- 78 JS18, p. 2.
- 79 The Alliance, p. 7.
- 80 The Alliance, p. 6.
- 81 JS2, p. 2.
- 82 JS2, p. 7.
- 83 HRCNI, pp. 4–5.
- 84 JS5, p. 10; AI, p. 2.
- 85 DPCA, p. 1; LFHR, p. 5. See also: MIND, p. 2; ODVV, p. 2; REF, p. 4.
- 86 JS18, p. 8.
- 87 JS2, p. 23.
- 88 JS2, p. 9.
- 89 NSS, p. 3.
- 90 JS19, p. 6.
- 91 REF, p. 7; ODVV, p. 3; JS5, p. 3.
- 92 JS8, p. 5; JS18, p. 8.
- 93 JS6, pp. 1–6.
- 94 ICAN, p. 1.
- 95 Redress, p. 4; AI, p. 1; JS19, pp. 8–10.
- 96 ODVV, p. 2.
- 97 JS19, p. 9.
- 98 NIYF, p. 6; JS21, p. 16.
- 99 Reprieve, p. 4.
- 100 AI, p. 4.

- 101 Reprieve, p. 6
102 JS8, p. 11.
103 CoE-CPT. CPT/Inf (2020) 18-Part, pp. 1–3.
104 CoE-CPT. CPT/Inf (2019) 29-Part, pp. 1–3.
105 JS5, p. 4.
106 JS5, p. 7.
107 HLPR, pp. 1–6.
108 FPFW, p. 4; FWS, p. 4, NONE, p. 2.
109 AI, p. 2. See also: IHRC, p. 3; ODVV, p. 3; REF, p. 4.
110 CRIN, p. 6.
111 IHRC, p. 3. See also: JS19, p. 6.
112 JS9, p. 3.
113 LSEW, p. 5.
114 RFJ, p. 3; JS15, p. 2.
115 RSI, pp. 1–5; RFJ, p. 3; JS15, pp.3, 4, and 6. See also: JS20, p. 9.
116 RSI, p. 2; RFJ, pp. 6–7.
117 JS22, pp. 2–9.
118 ADF, pp. 1–3.
119 HUK, p. 9.
120 JS9, pp. 3–4.
121 IHRC, p. 1.
122 CIVICUS, p. 8.
123 CIVICUS, p. 9.
124 AI, pp. 1 and 4. See also: CIVICUS, p. 4.
125 ICTUR, p. 7.
126 CIVICUS, pp. 3–7; JS20, pp. 7–11.
127 CFoIS, p. 3.
128 CIVICUS, p. 3.
129 JS1, p. 8.
130 OSCE-ODIHR, p. 2.
131 SBC, pp. 3–4.
132 HUK, p. 8.
133 Reprieve, p. 2. See also: US, p. 4.
134 JS17, pp. 4–7.
135 CoE-GRETA, pp. 4–5.
136 AI, p. 2.
137 JS11, p. 2.
138 FPFW, p. 3.
139 NIWEP, p. 2.
140 JS18, p. 5.
141 HUK, p. 3.
142 JS11, pp. 11–14.
143 JS1, p. 4.
144 NIWEP, p. 3.
145 HRW, pp. 5–6; NIWEP, p. 2; ODVV, p. 2; JS2, p. 15.
146 CYPCS, p. 2.
147 LFHR, p. 4.
148 Mind, p. 6. See also: JS2, p. 11.
149 JS2, p. 16.
150 ICTUR, p. 2; NIYF, p. 7; ODVV, p. 2; RCUK, p. 3; JS2, p. 15; JS18, p. 10.
151 HRW, p. 5.
152 JS19, p. 11; CYPCS, p. 1.
153 JS21, p. 18.
154 HRW, p. 6.
155 HRW, p. 5. See also: ICTUR, p. 2; ODVV, p. 2; RCUK, p. 3.
156 HRW, p. 6.
157 AI, p. 4; JS19, pp. 11–12. See also: RUCK, p. 3; HRW, p. 7.
158 JS3, pp. 1–3. NIYF, p. 5.
159 Shelter Scotland pp. 1–2; JS18, p. 11.
160 JS3, p. 3.
161 FPFW, p. 3; JS7, p. 6.
162 RCUK, p. 3.

- 163 CAPCS, p. 6.
164 ASUK, pp. 3–8.
165 LFHR, pp. 3–7; Mind, pp. 2–5; JS19, p. 12.
166 CYPCS, p. 5; The Alliance, p. 3; JS8, p. 9; JS18, p. 9.
167 NIYF, p. 3; JS21, p. 5.
168 JS4, p. 7.
169 NSS, pp. 1–2; HUK, pp. 1–3.
170 HUK, p. 4.
171 JS18, p. 7.
172 ADF, pp. 4–5; HUK, pp. 6–7.
173 JS21, p. 11; NIYF, p. 5.
174 CYPCS, p. 3. See also: The Alliance, p. 3; JS8, p. 12.
175 JS21, p. 11.
176 JS13, pp. 14–15.
177 BCN, p. 3; JS19, p. 7.
178 BCN, p. 3.
179 JS19, p. 10.
180 JS20, pp. 1–4.
181 CYPCS, p. 4.
182 The Alliance, p. 6.
183 NIYF, p. 10; JS21, p. 24.
184 JS6, p. 7.
185 AI, p. 3. See also: ODVV, p. 3.
186 JS11, p. 13.
187 CFoIS, p. 5.
188 NIWEP, p. 1.
189 HRW, p. 7. See also: JS8, p. 4.
190 JS4, p. 11.
191 AI, p. 3; HRW, p. 7; RCUK, p. 3. See also: DPAC, p. 2.
192 JS4, p. 8.
193 HRW, p. 8.
194 FWS, p. 1.
195 FPFW, p. 2; JS7, p. 4.
196 JS7, p. 7.
197 FWS, pp. 2–4.
198 FWS, p. 6.
199 CoE-Commissioner, p. 6; JS5, p. 5; JS18, p. 6; JS19, p. 14.
200 HLPR, p. 6.
201 CRIN, pp. 1–3; JS19, p. 16.
202 CRIN, p. 4.
203 JS16, p. 9.
204 NIYF, p. 2.
205 JS19, p. 5.
206 DPCA, p. 2; JS18, p. 3.
207 The Alliance, p. 3.
208 JS21, p. 12.
209 JS18, p. 9.
210 LFHR, pp. 8–9.
211 DSUO, pp. 3–8; ECLJ, p. 5.
212 DSUO, p. 8.
213 JS13, pp. 4–5.
214 JS13, pp. 14–16. See also: DPAC, p. 2.
215 REF, p. 8.
216 HLPR, p. 7.
217 JS13, p. 7.
218 JS3, pp. 12–14.
219 CoE-CM, Resolution CM/ResCMN (2018), p. 1.
220 JS10, p. 3; LFHR, p. 5; DPAC, p. 1.
221 JS18, p. 8. See also FWS, p. 2.
222 JS21, p. 23.
223 JS10, pp. 5–7; NIWEP, p. 1.
224 NONE, p. 5.

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- 225 JS4, p. 12; Redress, p. 7.
226 AI, p. 4.; JS10, pp. 5–7.
227 LFB Alliance, pp. 3–6. See also: FWS, p. 2.
228 JS10, p. 3. See also: DPAC, p. 1.
229 JS18, p. 8.
230 JS9, p. 4.
231 JS10, p. 12.
232 AI, p. 2; FFT, pp. 1–2; HRW, pp. 3–4; LSEW, p. 5; ODVV, p. 3; RCUK, p. 1; Redress, p. 5; US, p. 1; JS2, p. 12; JS3, p. 6; JS5, p. 3; JS9, p. 5; JS11, p. 4; JS16, p. 11; JS18, p. 3; JS19, p. 15; JS23; p. 7.
233 AI, p. 2; FFT, pp. 1–2; HRW, pp. 3–4; LSEW, p. 5; Redress, p. 5; US, p. 1; JS2, p. 12; JS3, p. 6; JS9, p. 5; JS16, p. 11; JS23; p. 7.
234 US, pp. 2–3; JS9, p. 6; JS16, pp. 11–12; JS23, p. 10.
235 HRW, p. 4.
236 BID, pp. 2–3; RCUK, p. 2; JS3, p. 8; JS5, p. 3; JS18, p. 4.
237 HRW, p. 4.
238 Redress, p. 5.
239 BID, pp. 5–6.
240 JS11, p. 8.
241 FFT, p. 2; ODVV, p. 2; JS9, p. 5.
242 CoE. CommHR/DM/sf/050-2021, p. 8.
243 HRW, p. 4.
244 FFT, p. 2; JS3, p. 5; JS9, p. 6.
245 JS3, p. 4.
246 JS16, pp. 3–6.
247 JS16, p. 15.
248 JS23, pp. 5–12; JS16, p. 12.
249 EVACH, pp. 1–2. See also: JS19, p. 8.
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