

Britain and the Convention against Torture

—
Follow-up submission to the UN
Committee against Torture

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1. The role of the Equality and Human Rights Commission and the scope of this submission

The Equality and Human Rights Commission (EHRC) was established by the UK Parliament through the Equality Act 2006 as an independent body with a mandate covering equality and human rights. Among other human rights responsibilities, we are responsible for ‘encouraging good practice in relation to human rights’. Our remit for human rights covers issues in England and Wales, and those issues in Scotland that are reserved to the UK Parliament.

Our role as a National Human Rights Institution (NHRI) requires us to assess and report on the UK’s progress in fulfilling its human rights obligations. We work with other NHRIs in the UK – the Scottish Human Rights Commission (SHRC) and the Northern Ireland Human Rights Commission – and liaise with government departments and agencies to fulfil this role. All three NHRIs hold ‘A status’ accreditation with the United Nations.

This document is a follow-up submission regarding the Concluding Observations adopted by the Committee against Torture (‘the Committee’) on the sixth periodic report of the UK.¹ The Committee’s Concluding Observations requested the State party to provide information on the recommendations identified for follow-up. This submission is intended to inform the Committee. It provides our assessment of the UK and Welsh Governments’ progress towards implementing the Concluding Observations.

¹ [Committee against Torture \(2019\), ‘Concluding observations on the sixth periodic report of the United Kingdom of Great Britain and Northern Ireland’, CAT/C/GBR/CO/6 \[accessed: 11 May 2020\].](#)

In this submission, we focus on developments and evidence that have emerged since the adoption of the Concluding Observations in May 2019 and are relevant to certain key issues identified by the Committee. We indicate where progress has been made, highlight the main concerns or challenges we have identified, and make recommendations to the UK and Welsh Governments.

This submission focuses on:

- accountability for any torture and ill-treatment committed by United Kingdom personnel in Iraq from 2003 to 2009, and
- overall implementation of the Concluding Observations.

While our focus in this submission is limited to the areas named above, we recognise the equal importance of each recommendation outlined in the Committee's Concluding Observations. We urge the UK Government to implement each of these in full and without delay.

2. Accountability for any torture and ill-treatment committed by United Kingdom personnel in Iraq from 2003 to 2009

In its 2019 Concluding Observations, the Committee urged the UK to ‘take all necessary measures to establish responsibility and ensure accountability for any torture and ill-treatment committed by United Kingdom personnel in Iraq from 2003 to 2009, specifically by establishing a single, independent, public inquiry to investigate allegations of such conduct.’²

The Committee also said that the UK ‘should refrain from enacting legislation that would grant amnesty or pardon where torture is concerned’ and ‘should ensure that all victims of such torture and ill-treatment obtain redress.’³

In its request to the State party for follow-up information, the Committee appealed specifically for details of the UK’s actions regarding this issue. The following submission outlines three key areas of concern from our perspective.

² [Committee against Torture \(2019\), ‘Concluding observations’, paragraph 33.](#)

³ [Ibid.](#)

2.1 Allegations of abuse by British military abroad⁴

The scale of abuse of Iraqi citizens by British service personnel between 2003 and 2009 remains unknown. The Iraq Historical Allegations Team (IHAT) opened over 3,000 cases concerning allegations of abuse, but these did not lead to any prosecutions.⁵ Following IHAT's closure in 2017, the remaining cases were assigned to the Service Police Legacy Investigations (SPLI).⁶ As of 31 December 2019, the SPLI had closed, or was in the process of closing, 1,198 allegations, and 82 allegations remained under consideration.⁷ Hundreds of civil claims of mistreatment of Iraqi citizens by British service personnel have also been made in the British courts, with the Ministry of Defence reportedly paying over £20 million in compensation to Iraqi claimants.⁸ The lack of an overarching inquiry into the Iraq allegations means that potential systemic issues – such as shortcomings in policy, training or supervision – have not been investigated independently.

⁴ On 23 August 2016, the UK submitted a written reply regarding its implementation of the Human Rights Committee's recommendations in paragraphs 8 and 9 of its Concluding Observations (CCPR/C/GBR/CO/7, 21 July 2015). The Human Rights Committee published its assessment of the UK's reply on 18 April 2018, assessing that the UK's reply in relation to paragraph 9 (Accountability for human rights violations committed by British forces abroad) was not satisfactory: [Report on follow-up to concluding observations of the Human Rights Committee, CCPR/C/122/3](#), 18 April 2018.

⁵ UK Government (2017), 'IHAT table of work completed'. GOV.UK [accessed: 11 May 2020].

⁶ UK Government (2019), 'Service Police Legacy Investigations'. GOV.UK [accessed: 11 May 2020].

⁷ UK Government (2019), 'SPLI – quarterly update – 1 Oct 19 to 31 Dec 19'. GOV.UK [accessed: 11 May 2020].

⁸ Johnson, J. (2019), 'Lawyers behind "witch hunt" of British troops in Iraq paid £11m by Ministry of Defence', [The Telegraph](#), 8 January 2019; Ruck Keene, D. (2017), 'You win some, you lose some. Rahmatullah (No. 2) in the Supreme Court', UK Human Rights Blog website, 24 January 2017 [accessed: 11 May 2020].

We are concerned about assertions arising from a Sunday Times and BBC Panorama investigation released in November 2019 that claimed the Ministry of Defence and some elements of the Armed Forces covered up evidence of war crimes, including the abuse and killing of civilians in Iraq, and that prosecutions were not pursued despite credible evidence that offences had occurred. Following the allegations, which relied in part on evidence from within IHAT, the International Criminal Court (ICC) suggested that it could open a formal investigation into the matter.⁹ Since 2014, the ICC been conducting preliminary examinations of the UK's actions in Iraq, including consideration of many of the concerns outlined in this report.¹⁰

In March 2020, the UK Government introduced the Overseas Operations (Service Personnel and Veterans) Bill (hereafter, 'the Bill'), which intends to create a 'presumption against prosecution' for UK military personnel who have been accused of committing crimes, including torture and ill-treatment, overseas.¹¹ The Bill halves the time limitation on prosecution from the previously proposed ten years to just five years.¹² The Bill was introduced despite the Committee recommending in its May 2019 Concluding Observations to the UK that the State party 'should refrain from enacting legislation that would grant amnesty or pardon where torture is concerned' and 'should also ensure that all victims of such torture and ill-treatment obtain redress'.¹³

Despite very few prosecutions of this nature,¹⁴ and existing legal safeguards, the Ministry of Defence stated that the Bill aimed to 'prevent vexatious

⁹ [BBC News \(2019\), 'International Criminal Court may investigate UK "war crimes cover-up"', BBC News website, 18 November 2019 \[accessed: 11 May 2020\].](#)

¹⁰ [International Criminal Court, 'Preliminary Examination: Iraq/UK'. ICC website \[accessed: 11 May 2020\].](#)

¹¹ [Overseas Operations \(Service Personnel and Veterans\) Bill \(HC Bill 117\).](#)

¹² [Ministry of Defence \(2019\), 'Legal protections for armed forces personnel and veterans serving in operations outside the United Kingdom'.](#)

¹³ [Committee against Torture \(2019\), 'Concluding observations', paragraph 33.](#)

¹⁴ [UK Government \(2017\), 'IHAT table of work completed'. GOV.UK \[accessed: 12 May 2020\]; European Center for Constitutional and Human Rights \(2019\), 'War crimes by UK forces in Iraq', 31 July 2019, page 6.](#)

prosecutions'.¹⁵ We are concerned that the creation of a 'presumption against prosecution' is akin to a statute of limitations – a principle that is widely seen as incompatible with the international human rights framework¹⁶ and customary international law.¹⁷

The 'presumption against prosecution' may also be incompatible with the UK's obligations under Article 7 of the Convention against Torture (CAT) to either prosecute or extradite individuals where there is evidence of torture and ill-treatment.¹⁸ As a consequence of a failure to prosecute domestically, UK personnel may face being extradited by other States party to the CAT.¹⁹ In addition, it is possible that the ICC may exercise its jurisdiction with respect to alleged offences that the UK is unwilling to prosecute.²⁰

The Bill makes a number of exceptions to which the five-year time limit on prosecutions would not apply, including allegations relating to sexual offences, without a clear rationale for this divergence.²¹ As a result, the Bill effectively introduces a two-tier system of accountability whereby certain war crimes or crimes against humanity may be prosecuted when they involve sexual offences, but not when they involve murder or torture.

The proposals also include amendments to the Human Rights Act 1998 and other legislation. These amendments would limit the discretion of the courts to

¹⁵ [Sengupta, K. \(2020\), 'Government to introduce 5-year limit on prosecuting armed forces for human rights abuses', Independent website, 13 March 2020 \[accessed: 11 May 2020\].](#)

¹⁶ [Committee against Torture \(2012\), 'General comment no. 3: implementation of article 14 by states parties', paragraph 40 \[accessed: 11 May 2020\].](#)

¹⁷ [See, for example, International Committee of the Red Cross \(2005\), Customary International Humanitarian Law Volume 1: Rules, Rule 158, page 607. Cambridge: Cambridge University Press \[accessed: 11 May 2020\].](#)

¹⁸ [International Court of Justice \(2012\), 'Questions relating to the obligation to prosecute or extradite \(Belgium v Senegal\)', 20 July 2012, General List No. 144, paragraph 95: 'prosecution is an international obligation under the Convention, the violation of which is a wrongful act engaging the responsibility of the State.'](#)

¹⁹ [Freedom from Torture \(2019\), 'Response to MoD consultation on legal protections for armed forces personnel', page 7.](#)

²⁰ [Ibid.](#)

²¹ [Overseas Operations \(Service Personnel and Veterans\) Bill \(HC Bill 117\), Clause 6; Schedule 1.](#)

override the time limit for civil claims including a human rights claim²² and a claim for damages for personal injury or death arising from overseas operations.²³ The effect of these provisions would be to prescribe the factors the court must take into account when deciding whether or not to extend a time limit. The factors must include the operational context and the impact on the mental health of any witness who is, or was at the time of the incident, serving in the armed forces. The court would not have discretion to extend the time limit beyond six years from the relevant date or one year from the date of knowledge of the incident.

The Bill also includes a requirement²⁴ that the UK Government considers derogating from the European Convention on Human Rights (ECHR), under Article 15,²⁵ with regards to certain future overseas operations, which would exempt military personnel from the obligation to act within the parameters of international human rights standards. There is scant detail in the Bill to indicate in what circumstances the derogation clause would apply, and when the Government would consider such a derogation to be 'appropriate'. To date, no member State has ever made a derogation of this nature and, as such, there is no clear answer to questions which arise around the applicability of Article 15 to military operations conducted abroad and outside the ECHR's territorial jurisdiction. Furthermore, the proposals to derogate are likely to have an impact on the collective enforcement of the rights and guarantees contained in the ECHR.

²² [Ibid., Clause 11.](#)

²³ [Ibid., Schedule 2.](#)

²⁴ [Ibid., Clause 12.](#)

²⁵ [European Convention on Human Rights, Article 15: derogation in times of emergency.](#)

Other areas of concern include barriers to the practicable application of these rules,²⁶ the consequences of setting inconsistent standards across criminal and civil law,²⁷ and the likely incompatibility with Articles 2²⁸ and 3²⁹ of the ECHR.

The UK is a permanent member of the UN Security Council and a standard-bearer for the international rules-based system. The provisions of the Bill, however, risk the UK's international reputation and could set a dangerous precedent for other countries around the world. The Bill's proposals come in the same year that the UK seeks re-election to the Human Rights Council (HRC), and at the same time as the UK Government's Minister of State for the UN is calling for the UK to bring to justice those who are responsible for the most serious crimes of international concern.³⁰ The Bill's proposals indicate a worrying departure from these basic principles of international justice. By continuing with these proposals, the UK risks encouraging impunity for torture and ill-treatment and contributing to the erosion of long-held norms in this area.

²⁶ See [The Law Society's response to the MoD's consultation](#). Law Society (2019), 'Legal protections for armed forces personnel and veterans serving in operations outside the UK – Law Society response', Law Society website, 11 October 2019 [accessed: 11 May 2020].

²⁷ [Ibid.](#)

²⁸ [McCann and Others v UK \(27 September 1995\)](#) [European Court of Human Rights, Application no. 18984/91], paragraph 161: when reading Article 2 in conjunction with Article 1 there is an obligation on the State to conduct an investigation when individuals have been killed by the use of force by agents of the state. [Marguš v Croatia \(27 May 2014\)](#) [European Court of Human Rights, Application no. 4455/10], paragraph 127: '[G]ranted amnesty in respect of the killing and ill-treatment of civilians would run contrary to the State's obligations under Articles 2 and 3 of the Convention since it would hamper the investigation of such acts and necessarily lead to impunity for those responsible.'

²⁹ [Cestaro v Italy \(7 July 2015\)](#) [European Court of Human Rights, Application no. 6884/11], paragraph 208; [Berganovic v Croatia \(25 September 2009\)](#) [European Court of Human Rights, Application no. 46423/06], paragraph 71.

³⁰ [Lord Tariq Ahmad of Wimbledon \(2 December 2019\)](#), 'Assembly of States Parties of the International Criminal Court 2019: Lord Ahmad's statement'. GOV.UK [accessed: 11 May 2020].

2.2 Complicity in mistreatment of detainees held by other governments

There has still not been a comprehensive independent investigation into allegations of torture or ill-treatment of detainees held by other governments in which UK security and intelligence agencies have been implicated, including by means of complicity. Following the early closure of the Gibson inquiry in 2013, responsibility for investigating the allegations was handed to the Intelligence and Security Committee of the UK Parliament (ISC), whose slow progress was criticised by the Human Rights Committee in 2015.³¹

In June 2018, the ISC finally published its findings.³² The ISC noted that its inquiry was limited due to UK Government restrictions on questioning witnesses about specific cases. Based on available evidence, the ISC provisionally concluded that UK security and intelligence personnel had either witnessed, or been informed of, mistreatment in hundreds of US-led interviews, yet had continued to cooperate with interrogators. They also found that the UK had facilitated over 70 rendition operations from 2001 to 2010.³³ Despite these findings, the UK Government announced in July 2019 that it would not hold an inquiry into UK involvement in rendition and torture.³⁴ In October 2019, a legal challenge to this decision was launched.³⁵

³¹ [Human Rights Committee \(2015\), 'Concluding observations', paragraph 9 \[accessed: 12 May 2020\].](#)

³² [Intelligence and Security Committee of Parliament \(2018\), *Detainee Mistreatment and Rendition: 2001–2010*.](#)

³³ [Ibid.](#)

³⁴ [House of Commons Hansard \(2019\), 'Detainees: The Chancellor of the Duchy of Lancaster and Minister for the Cabinet Office \(Mr David Lidington\)', 18 July 2019, vol. 663, column 973 \[accessed: 12 May 2020\].](#)

³⁵ [Reprieve \(2019\), 'MPs and Reprieve take Government to court over refusal to hold torture inquiry', Reprieve website, 10 October 2019 \[accessed: 12 May 2020\].](#)

2.3 Consolidated guidance

In its 2018 report on detainee mistreatment and rendition, the ISC echoed calls by the UN and domestic stakeholders for the UK Government to clarify aspects of its 'Consolidated guidance to intelligence officers and service personnel on the detention and interviewing of detainees overseas'. In particular, the ISC called to remove the ambiguity around the obligation to cease engagement with foreign security and intelligence services in any case where there is a risk of torture.³⁶

The then Prime Minister, Theresa May, responded by calling on the Investigatory Powers Commissioner's Office (IPCO) to propose how to improve the consolidated guidance, 'taking account of the ISC's views and those of civil society'.³⁷ The IPCO launched a consultation in August 2018 and received contributions from numerous stakeholders. In July 2019, the UK Government published a revised version of the consolidated guidance,³⁸ reportedly accepting the IPCO's proposed principles in full.³⁹ As the IPCO's draft of the proposed principles was not published, it is impossible to verify whether any changes were made to the draft.⁴⁰ However, the revisions introduced do not sufficiently address our concerns regarding the obligation to cease engagement where there is a risk of torture: the updated guidance contains only a 'presumption' against proceeding where there is a 'real risk' of torture, unlawful killing or extraordinary rendition.⁴¹

³⁶ [Intelligence and Security Committee of Parliament \(2018\), Detainee Mistreatment and Rendition: 2001–2010.](#)

³⁷ [UK Parliament \(2018\), 'ISC detainee reports: written statement – HCWS808', 28 June 2018 \[accessed: 12 May 2020\].](#)

³⁸ [HM Government \(2019\), 'The principles relating to the detention and interviewing of detainees overseas and the passing and receipt of intelligence relating to detainees'.](#)

³⁹ [UK Parliament \(2019\), 'Review of consolidated guidance: written statement – HCWS1738', 18 July 2019 \[accessed: 12 May 2020\].](#)

⁴⁰ While a letter from the IPCO dated 12 June 2019 has been published, the IPCO's 'suggested revised Principles' referred to in that letter were not annexed and have not been made publicly available. [IPCO \(2019\), 'Letter to the Prime Minister on the proposals to review the consolidated guidance', 12 June 2019 \[accessed: 12 May 2020\].](#)

⁴¹ [HM Government \(2019\), 'The principles'.](#)

2.4 Recommendations

Allegations of abuse by British military abroad and complicity in mistreatment of detainees held by other governments

The UK Government should:

- Withdraw legislative proposals for a statutory presumption against the prosecution of current or former military personnel in cases involving allegations of torture or ill-treatment. Any revised proposals must be wholly compatible with the UK's obligations under the existing domestic and international human rights framework, including the Convention against Torture.
- Reconsider its decision not to set up full, independent judge-led inquiries into allegations of torture committed by British military personnel in Iraq between 2003 and 2009, and into allegations of British involvement, including by means of complicity, in the mistreatment of detainees held by other governments. Any inquiries should be able to secure relevant evidence to hold alleged perpetrators to account, and they should examine systemic issues so that lessons learned can inform future practice.

Consolidated guidance

The UK Government should:

- Publish the Investigatory Powers Commissioner's Office's draft proposed principles to improve the consolidated guidance.
- Amend the revised guidance to ensure that British intelligence and security personnel cease any engagement with detainees in the custody of foreign intelligence services, in any case where there is a risk of torture or ill-treatment.

3. Overall implementation of the Concluding Observations

In its request for follow-up information, the Committee asked the State party ‘to inform the Committee about its plans for implementing, within the coming reporting period, some or all of the remaining recommendations in the Concluding Observations.’⁴²

3.1 National Mechanism for Implementation, Reporting and Follow-up

For some time, we have argued that the UK should establish a National Mechanism for Implementation, Reporting and Follow-up (NMIRF) to effectively and efficiently implement the provisions and recommendations emanating from the UN human rights system.

Following the UK’s Universal Periodic Review (UPR) in 2017, the UN High Commissioner for Human Rights recommended that the UK establish a NMIRF. Such a body would ensure a coordinated, effective approach to reporting to, and engaging with, human rights reviews, and provide a stronger accountability mechanism for overseeing the implementation of the UK’s human rights obligations.⁴³ This call has been echoed by a number of UN treaty bodies, as

⁴² [Committee against Torture \(2019\), ‘Concluding observations’, paragraph 66.](#)

⁴³ The Office of the High Commissioner for Human Rights conducted a global study into the creation of national mechanisms (published in 2016), identifying a wide range of innovative approaches by countries across the world. While there is no ‘one size fits all’ approach, the study identified a number of common outcomes: enhancing the sustainability of domestic expertise and structures, supporting an inclusive and participatory dialogue across diverse actors and strengthening the scrutiny of legislation and policy. [UN Office of the High](#)

well as domestic stakeholders, such as the UK Parliament's Women and Equalities Select Committee (WESC)⁴⁴ and the Scottish Parliament's Equalities and Human Rights Committee.⁴⁵

Despite this, to date there has been a lack of political will by the UK Government to take on board calls for greater action, the publication of implementation plans on UN recommendations, and a more coordinated approach to monitoring, reporting and implementation. However, there is interest from the devolved governments to strengthen human rights protections and accountability frameworks.⁴⁶

In November 2018, the Scottish Parliament's Equalities and Human Rights Committee recommended, as an immediate priority, the establishment of a 'Scottish mechanism for implementation, reporting and follow up, modelled on the NMIRFs recommended by the UN'.⁴⁷ The First Minister's Advisory Group on Human Rights Leadership made the same recommendation⁴⁸ and a National Taskforce for Human Rights was subsequently set up to take this and the Advisory Group's recommendations further (especially the recommendations regarding the incorporation of human rights treaties). The EHRC and SHRC are both members of this taskforce.

[Commissioner for Human Rights \(2016\), National Mechanisms for Reporting and Follow-up: A Study of State Engagement with International Human Rights Mechanisms.](#)

⁴⁴ [Women and Equalities Committee \(2019\), 'Letter to the UN Committee on the elimination of discrimination against women, concerning the UK's review', 23 January 2019.](#)

⁴⁵ [Scottish Parliament Equalities and Human Rights Committee \(2018\), Getting Rights Right: Human Rights and the Scottish Parliament, 26 November 2018, SP Paper 431, paragraph 129.](#)

⁴⁶ [See, for example, Deputy Minister Jane Hutt AM's speech during the Welsh Assembly's debate on the Equality and Human Rights Commission's Annual Review 2018–19 \(25 February 2020\).](#)

⁴⁷ [Scottish Parliament Equalities and Human Rights Committee \(2018\), Getting Rights Right, paragraph 129.](#)

⁴⁸ [First Minister's Advisory Group on Human Rights Leadership \(2018\), Recommendations for a New Human Rights Framework to Improve People's Lives – Report to the First Minister, 10 December 2018, Recommendation 4.](#)

In Wales, we engaged with the Children, Young People and Education Committee's inquiry into children's rights and reiterated our calls for the Welsh Government to establish an NMIRF. While recommendations from the Children, Young People and Education Committee have not yet been published, other stakeholders have echoed the need to strengthen accountability and effectiveness in upholding the international human rights framework in Wales.

If the UK is to retain a reputation as a leader in human rights at the international level, it should establish an NMIRF as an urgent priority.

3.2 Our approach

To date our efforts to push for greater accountability mechanisms have focused on three key areas:

- Our Human Rights Tracker⁴⁹: an online tool which compiles all UN recommendations to the UK in a searchable, accessible format. The tracker raises awareness of the UK's human rights obligations and helps users monitor how well they are being implemented.
- A Treaty Monitoring Working Group: bringing together UK Government officials with responsibility for treaty reporting and implementation from across different departments. This also includes representatives from the Joint Committee on Human Rights/WESC and the National Preventive Mechanism. The Group meets quarterly to share best practice, discuss upcoming reporting obligations and discuss progress towards implementation.
- Identifying opportunities to engage the UK and devolved governments and parliaments around our calls for a NMIRF, and influencing UN bodies to reiterate this in their recommendations.

It is our concern that, without meaningful oversight of implementation, the UK and Welsh Governments will be unable to respond effectively to the recommendations of the Committee, and of other human rights bodies. The protection of human rights in Great Britain will continue to be undermined by this failure.

⁴⁹ [EHRC, 'Human Rights Tracker'. EHRC website \[accessed: 12 May 2020\].](#)

With the UK seeking re-election to the HRC in 2020,⁵⁰ the UK Government must engage with international best practice and demonstrate domestic ambition concerning human rights where this has been lacking.⁵¹ We continue to urge the UK and Welsh Governments that to implement the UN's recommendations and to protect people in the best way possible, they should incorporate international human rights treaties, including the CAT, into domestic law.

3.3 Recommendations

To strengthen the commitment to the international human rights framework, and ensure a joined-up approach to implementation of the UK's obligations at a domestic level, we continue to recommend that:

- The UK and Welsh Governments put in place comprehensive national mechanisms for monitoring and reporting on progress and ensuring implementation of the UPR and treaty body recommendations.
- The UK and Welsh Governments incorporate international human rights treaties into domestic law, so that individuals can effectively challenge rights violations using the domestic legal system and access a domestic remedy for alleged breaches of their rights.

⁵⁰ [UK Government \(2019\), Press Release: UK to stand for re-election to Human Rights Council, 25 February 2019. GOV.UK \[accessed: 12 May 2020\].](#)

⁵¹ [See UK Government's pledges for re-election to the HRC. UK Government \(2020\), 'UN Human Rights Council – United Kingdom – 2021–23 Candidate'.](#)

Contacts

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