



UNHCR

United Nations High Commissioner for Refugees
Haut Commissariat des Nations Unies pour les réfugiés



Excerpts of Concluding Observations and Recommendations from UN Treaty Bodies and Special Procedure Reports

- Universal Periodic Review:

UNITED KINGDOM

We would like to bring your attention to the following excerpts from UN Treaty Monitoring Bodies' Concluding Observations and Recommendations relating to issues of interest and persons of concern to UNHCR with regards to the United Kingdom.

1. Treaty Body Reports

CERD/C/GBR/CO/18-20

COMMITTEE ON THE ELIMINATION OF RACIAL DISCRIMINATION,

79th session

14 September 2011

11. The Committee is concerned at reports of an increase in virulent attacks on, and negative portrayal of, ethnic minorities, immigrants, asylum seekers and refugees by the media in the State party. The Committee accordingly regrets that the State party continues to maintain its restrictive interpretation of the provisions of article 4 of the Convention which the Committee has determined as being of a mandatory character in its general recommendation No. 15 (1993) on article 4 of the Convention, which, inter alia, deals with organized violence based on ethnic origin (arts. 2, 4 and 6).

The Committee notes the State party's own recognition that the rights to freedom of expression and opinion are not absolute rights, and recommends that the State party withdraw its interpretative declaration on article 4 in the light of the continuing virulent statements in the media that may adversely affect racial harmony and increase racial discrimination in the State party. The Committee recommends that the State party closely monitor the media with a view to combating prejudices and negative stereotypes, the unchecked expression of which may result in racial discrimination or incitement to racial hatred. The State party should adopt all necessary measures to combat racist media coverage and ensure that such cases are thoroughly investigated and, where appropriate sanctions are imposed.

13. While noting with appreciation the coming into force of the Equality Act 2010, the Committee is deeply concerned that the austerity measures adopted in response to the current economic downturn, and the so-called "Red Tape" challenge, including scrutiny of measures envisaged under the Equality Act to prune those deemed "bureaucratic or burdensome", threaten to dilute or reverse the State party's achievements in the fight against racial discrimination and inequality. In this context, the Committee recalls its general recommendation No. 33 (2009) on Follow-Up to the Durban Review Conference,

and reiterates that responses to financial and economic crises should not lead to a situation which would potentially give rise to racial discrimination against foreigners, immigrants and persons belonging to ethnic minorities (arts. 2 and 5).

The Committee recommends that the State party should implement all of the provisions of the Equality Act and ensure that there is no regression from the current levels of protection. Notwithstanding the economic downturn, the State party should ensure that any austerity measures do not exacerbate the problem of racial discrimination and inequality. Impact assessments are necessary before adopting such measures to ensure that they are not differentially targeted or discriminatory to those vulnerable to racial discrimination.

16. The Committee expresses deep concern that the provisions of section 19D of the earlier Race Relations Act of 2000, which permit public officials to discriminate on grounds of nationality, ethnic and national origin, provided that it is authorized by a Minister, have been replicated in the Equality Act 2010. The Committee is further concerned at reports that a Ministerial authorization came into force on 10 February 2011 which would allow the UK Border Agency (UKBA) to discriminate among nationalities in granting visas and when carrying out checks at airports and ports and points of entry of the State party (arts. 1 and 2).

The Committee recommends that the State party remove the exceptions based on ethnic and national origin to the exercise of immigration functions as well as the discretionary powers granted to the UK Border Agency (UKBA) to discriminate at border posts among those entering the territory of the State party.

E/C.12/GBR/CO/5

**COMMITTEE ON ECONOMIC, SOCIAL AND CULTURAL RIGHTS, 42nd Session
12 June 2009**

27. The Committee is concerned about the length of waiting time of asylumseekers before taking up employment until their asylum applications are processed, while noting the introduction of additional voucher support to particularly vulnerable asylum-seekers. It is also concerned at the low level of support and difficult access to health care for rejected asylum-seekers. (arts. 11 and 2)

The Committee encourages the State party to ensure that asylum-seekers are not restricted in their access to the labour market while their claims for asylum are being processed. It also recommends that the State party review section 4 of the Immigration and Asylum Act 1999 on support and provision regulating essential services to rejected asylum-seekers, and undocumented migrants, including the availability of HIV/AIDS treatment, when necessary.

28. The Committee continues to be concerned that poverty and fuel poverty, especially among children, remain widespread in the State party, despite the level of economic development and the positive steps it has taken. The Committee is also concerned that poverty levels vary considerably between and within regions and cities as well as between different groups of society, with higher poverty levels among ethnic minorities,

asylum-seekers and migrants, older persons, single mothers, and persons with disabilities. (art. 11)

The Committee urges the State party to intensify its efforts to combat poverty, fuel poverty, and social exclusion, in particular with regard to the most disadvantaged and marginalized individuals and groups and in the most affected regions and city areas. It also calls upon the State party to develop human rights-based poverty-reduction programmes, taking into consideration the Committee's Statement on Poverty and the International Covenant on Economic, Social and Cultural Rights of 2001 (E/C.12/2001/10). The Committee also encourages the State party to intensify its efforts aimed at achieving its target of reducing child poverty by half by 2010.

CRC/C/GBR/CO/4

COMMITTEE ON THE RIGHTS OF THE CHILD, 49th Session

20 October 2008

Committee's previous recommendations

6. The Committee, while welcoming the State party's efforts to implement the concluding observations on previous State party's reports, notes with regret that some of the recommendations contained therein have not been fully implemented, in particular:

(a) With respect to the concluding observations on the second periodic report of the United Kingdom (CRC/C/15/Add.188), those recommendations related, inter alia, to incorporation of the Convention in the State party's law (paras. 8-9); budgetary allocations (paras. 10-11); dissemination and awareness of the Convention (paras. 20-21); non-discrimination (paras. 22-23); corporal punishment (paras. 35-38); education (paras. 47-48); asylum-seekers and refugee children (paras. 49-50); juvenile justice (paras. 59-62);

7. The Committee urges the State party to take all necessary measures to address those recommendations from the concluding observations of the previous reports that have not yet - or not sufficiently - been implemented as well as those contained in the present concluding observations. In this context, the Committee draws the attention of the State party to its general comment No. 5 (2003) on general measures of implementation of the Convention on the Rights of the Child.

Non-discrimination

24. The Committee welcomes the State party's plans to consolidate and strengthen equality legislation, with clear opportunities to mainstream children's right to nondiscrimination into the United Kingdom anti-discrimination law (the forthcoming Equality Bill). The Committee also welcomes the adoption of action plans and the monitoring and information collection work carried out on the issue of discrimination. However, the Committee is concerned that in practice certain groups of children, such as: Roma and Irish Travellers' children; migrant, asylum-seeking and refugee children; lesbian, bisexual, gay, and transgender children (LGBT) and children belonging to minority groups continue to experience discrimination and social stigmatization. The Committee is also concerned at the general climate of intolerance and negative public attitudes towards children, especially adolescents, which appears to exist in the State

party, including in the media, and may be often the underlying cause of further infringements of their rights.

25. The Committee recommends that the State party ensure full protection against discrimination on any grounds, including by:

- (b) Strengthening its awareness-raising and other preventive activities against discrimination and, if necessary, taking affirmative actions for the benefit of vulnerable groups of children, such as Roma and Irish Travellers' children; migrant, asylum-seeking and refugee children; lesbian, bisexual, gay and transgender children (LGBT); and of children belonging to minority groups;**

Best interests of the child

26. The Committee regrets that the principle of the best interests of the child is still not reflected as a primary consideration in all legislative and policy matters affecting children, especially in the area of juvenile justice, immigration and freedom of movement and peaceful assembly.

27. The Committee recommends that the State party take all appropriate measures to ensure that the principle of the best interests of the child, in accordance with article 3 of the Convention, is adequately integrated in all legislation and policies which have an impact on children, including in the area of criminal justice and immigration.

Education, including vocational training and guidance

66. The Committee notes with appreciation the numerous efforts of the State party in the sphere of education, in order to guarantee the objectives set out in the Convention. However, it is concerned that significant inequalities persist with regard to school achievement of children living with their parents in economic hardship. Several groups of children have problems being enrolled in school or continuing or reentering education, either in regular schools or alternative educational facilities, and cannot fully enjoy their right to education, notably children with disabilities, children of Travellers, Roma children, asylum-seeking children, dropouts and non-attendees for different reasons (sickness, family obligations etc.), and teenage mothers.

67. The Committee recommends that the State party:

- (a) Continue and strengthen its efforts to reduce the effects of the social background of children on their achievement in school;**
- (b) Invest considerable additional resources in order to ensure the right of all children to a truly inclusive education which ensures the full enjoyment to children from all disadvantaged, marginalized and school-distant groups;**

Asylum-seeking and migrant children

70. The Committee welcomes the State party's commitment to withdraw its reservation to article 22, as well as the introduction of a new asylum procedure in March 2007 whereby all asylum applications from children are considered by specially trained "case owners", who are especially trained to interview children. It also welcomes the fact that the United Kingdom Border Agency (UKBA) has engaged in a wide process of reform

concerning unaccompanied asylum-seeking children in the State party as well as the plan to legislate a specific statutory child safeguarding duty on the UK Border Agency. However, the Committee is concerned that:

- (a) As also acknowledged recently by the Human Rights Committee, asylum-seeking children continue to be detained, including those undergoing an age assessment, who may be kept in detention for weeks until the assessment is completed;
- (b) There is a lack of data on the number of children seeking asylum;
- (c) There is no independent oversight mechanism, such a guardianship system, for an assessment of reception conditions for unaccompanied children who have to be returned;
- (d) Section 2 of the 2004 Asylum and Immigration Act permits the prosecution of children over the age of 10 if they do not possess valid documentation upon entry to the United Kingdom.

71. The Committee recommends that the State party:

- (a) Intensify its efforts to ensure that detention of asylum-seeking and migrant children is always used as a measure of last resort and for the shortest appropriate period of time, in compliance with article 37 (b) of the Convention;**
- (b) Ensure that the United Kingdom Border Agency (UKBA) appoints specially-trained staff to conduct screening interviews of children;**
- (c) Consider the appointment of guardians for unaccompanied asylumseekers and migrant children;**
- (d) Provide disaggregated statistical data in its next report on the number of children seeking asylum, including those whose age is disputed;**
- (e) Give the benefit of the doubt in age-disputed cases of unaccompanied minors seeking asylum, and seek experts' guidance on how to determine age;**
- (f) Ensure that when the return of children occurs, this happens with adequate safeguards, including an independent assessment of the conditions upon return, including family environment;**
- (g) Consider amending section 2 of the 2004 Asylum and Immigration (Treatment of Claimants etc.) Act to allow for a guaranteed defence for unaccompanied children who enter the United Kingdom without valid immigration documents.**

Sale, trafficking and abduction

75. The Committee notes with appreciation the information that the State party intends to ratify the Council of Europe Convention on Action against Trafficking in Human Beings. While welcoming the adoption of the United Kingdom Antitrafficking Action Plan, it is concerned that the necessary resources to implement it are not being provided, including those needed to ensure the provision of high quality services and safe accommodation for trafficked children.

76. The Committee recommends that the State party provide the necessary resources for an effective implementation of the Anti-trafficking Action Plan. It also recommends that the State party ratify the Council of Europe Convention on Action

against Trafficking in Human Beings and implement its obligations by ensuring that child protection standards for trafficked children meet international standards.

CEDAW/C/UK/5

COMMITTEE ON THE ELIMINATION OF DISCRIMINATION AGAINST WOMEN, 41st Session

10 July 2008

Trafficking

282. The Committee welcomes the State party's stated intention to ratify the Council of Europe Convention on Action against Trafficking in Human Beings by the end of 2008. The Committee also welcomes the recent announcement of a 45-day period of recovery and reflection for victims of trafficking, as well as the granting of temporary one-year visas. While acknowledging the measures taken by the State party to combat trafficking in women and children, including the adoption of the Sexual Offences Act (2003) and the Asylum and Immigration (Treatment of Claimants) Act (2004), the adoption of the United Kingdom Action Plan on Tackling Human Trafficking, and the launching of national multi-agency police operations (Operation Pentameter I and II), the Committee is concerned by the continuing prevalence and extent of this problem.

283. The Committee urges the State party to continue to take all appropriate measures to combat all forms of trafficking in women and children in line with article 6 of the Convention. In this respect, the Committee also urges the State party not only to address criminal justice measures and the prosecution of traffickers but also the protection and rehabilitation of victims of trafficking victims. The Committee further urges the State party to ensure the provision of adequate support services to victims, including those who do not cooperate with the authorities, and invites the State party to give consideration to granting victims of trafficking indefinite leave to remain. The Committee calls upon the State party to increase its efforts at international, regional and bilateral cooperation with countries of origin, transit and destination in order to prevent trafficking, to bring perpetrators to justice and to improve reintegration programmes to prevent victimization.

Vulnerable groups of women

295. The Committee is concerned at the situation of immigrant women and women asylum-seekers, who may be subject to multiple forms of discrimination with respect to education, health, employment and social and political participation. It notes that asylum on the grounds of gender-related persecution, including violence against women, is not frequently granted. It also notes that women in insecure immigration status are not allowed to access public funds, particularly health care services, public housing and social security benefits, with particularly negative consequences for victims of violence. The Committee is concerned that proposals to introduce pre-entry English-language tests for people applying for spouse visas may discriminate against certain groups of vulnerable refugees, in particular women.

296. The Committee calls upon the State party to keep under review and carefully monitor the impact of its laws and policies on women migrants, refugees and asylum-seekers with a view to taking remedial measures that effectively respond to the needs of those women. In this respect, the Committee urges the State party to review its “no recourse to public funds” policy to ensure the protection of and provision of support to victims of violence. The Committee also urges the State party to take effective measures to eliminate discrimination against immigrant and refugee women, both in society at large and within their communities. It calls upon the State party to pay specific attention to the vulnerability of women asylum-seekers while their claims are under examination and to ensure the full implementation of the Asylum Gender Guidelines.

**CCPR/C/GBR/CO/6
HUMAN RIGHTS COMMITTEE, 93rd Session
30 July 2008**

12. The Committee notes with concern that until the recent decision of the European Court of Human Rights in *Saadi v. Italy*, the State party was defending the position that persons suspected of terrorism could under certain conditions be returned to countries without the appropriate safeguards to prevent treatment prohibited by the Covenant. Furthermore, while the State party has concluded a number of memoranda of understanding on deportation with assurances, the Committee notes that these do not always in practice ensure that the affected individuals will not be subject to treatment contrary to article 7 of the Covenant, as acknowledged in the recent decisions of the Court of Appeal in *DD and AS v. Secretary of State for the Home Department* and *Omar Othman (aka Abu Qatada) v. Secretary of State for the Home Department* (2008). (art.7)

The State party should ensure that all individuals, including persons suspected of terrorism, are not returned to another country if there are substantial reasons for fearing that they would be subjected to torture or cruel, inhuman or degrading treatment or punishment. The State party should further recognise that the more systematic the practice of torture or cruel, inhuman or degrading treatment, the less likely it will be that a real risk of such treatment can be avoided by diplomatic assurances, however stringent any agreed follow-up procedure may be. The State party should exercise the utmost care in the use of such assurances and adopt clear and transparent procedures allowing review by adequate judicial mechanisms before individuals are deported, as well as effective means to monitor the fate of the affected individuals.

13. The Committee notes with concern that the State party has allowed the use of the British Indian Ocean Territory as a transit point on at least two occasions for rendition flights of persons to countries where they risk being subjected to torture or ill-treatment. (arts. 2, 7 and 14)

The State party should investigate allegations related to transit through its territory of rendition flights and establish an inspection system to ensure that its airports are not used for such purposes.

21. The Committee remains concerned that the State party has continued its practice of detaining large numbers of asylum-seekers, including children. Furthermore, the Committee reiterates that it considers unacceptable any detention of asylum-seekers in prisons and is concerned that while most asylum-seekers are detained in immigration centres, a small minority of them continue to be held in prisons, allegedly for reasons of security and control. It is concerned that some asylum-seekers do not have early access to legal representation and are thus likely to be unaware of their right to make a bail application which is no longer automatic since the enactment of the Nationality, Immigration and Asylum Act 2002. The Committee is also concerned by the failure to keep statistics on persons subject to deportation who are removed from Northern Ireland to Great Britain, as well as their temporary detention in police cells. (arts. 9, 10, 12 and 24)

The State party should review its detention policy with regard to asylum-seekers, especially children. It should take immediate and effective measures to ensure that all asylum-seekers who are detained pending deportation are held in centres specifically designed for that purpose, should consider alternatives to detention, and should end the detention of asylum-seekers in prisons. It should also ensure that asylum-seekers have full access to early and free legal representation so that their rights under the Covenant receive full protection. It should provide appropriate detention facilities in Northern Ireland for persons facing deportation.

2. Special Procedures

A/HRC/14/30/Add.3

**Report of the Special Rapporteur on the human rights of migrants, Mission to the United Kingdom of Great Britain and Northern Ireland, Jorge Bustamante
16 March 2010**

73. The United Kingdom has shown genuine efforts to deliver a migration policy which determines the conditions of admission, stay and removal of non-nationals while aiming at complying with human rights obligations. Migration management aims at contributing to meet world security challenges and immigration and asylum seeking standards and currently focuses on the forcible return of persons in irregular situations, strengthening the screening of asylum-seekers and enhancing international cooperation with countries affected by conflict as a means of reducing immigration flows. Despite progress made, in the Special Rapporteur's view, a number of challenges remain and he accordingly wishes to make the following recommendations.

75. In relation to the administrative detention of migrants, the Special Rapporteur recommends that the Government:

- (a) Consider the recommendations made by the Working Group on Arbitrary Detention in a 2009 report to the Human Rights Council,¹ particularly the call upon States to restrict the use of detention for immigration purposes, ensuring that it is a measure of last resort, only permissible for the shortest period of time and when no less restrictive measure is available and therefore, to use and make available alternative measures to detention both in law and in practice;**
- (b) Take measures to review the implementation of national laws applicable to the detention of migrants to ensure that they are harmonized with international human rights norms that prohibit arbitrary detention and inhumane treatment;**
- (c) Take all necessary steps to prevent cases of de facto indefinite detention and grant to migrants in detention all judicial guarantees, including keeping them informed of their cases' status.**

77. In relation to the protection of children in the context of migration, the Special Rapporteur recommends that the Government:

- (a) Ensure the protection of migrant children accompanied by their families from detention and guarantee that migration laws include actual regulations that realize children's rights and needs in such circumstances;**
- (b) Take all necessary steps to ensure the proscription of deportation of unaccompanied children and disputed-age cases as a punishment for irregular migration status and accordingly consider repatriation of children only if this is in their best interest, affording them, in any case, all judicial guarantees;**
- (c) Continue to take measures to bring its legislation into line with the Convention on the Rights of the Child and consider fully implementing the recommendations made by the Committee on the Rights of the Child,² including by both ensuring that the independence of all four children's commissioners is not limited by their mandate and that the posts are established in full compliance with the Paris Principles and considering the establishment of an independent oversight mechanism for assessing reception conditions for unaccompanied children, including those who have to be returned;**
- (d) Consider mainstreaming into its policies the Guidelines on International Protection: Child Asylum Claims under Articles 1A (2) and 1 (F) of the 1951 Convention and/or the 1967 Protocol relating to the Status of Refugees, adopted by UNHCR on 22 December 2009;³**
- (e) Increase efforts to integrate migrant children and children from a migrant background and their families into early childhood and language command programmes;**
- (f) Strengthen efforts to raise awareness on child protection measures and welfare services available to separated and unaccompanied children;**

¹ A/HRC/10/21, para. 82.

² CRC/C/GBR/CO/4, inter alia, paras. 16–17; 25–26; 66–67; 70–71.

³ HCR/GIP/09/08

- (g) Consider regularization and naturalization alternatives for failed unaccompanied asylum-seeking children who have been granted discretionary leave**
- a) to remain until the age of 17 and a half;⁴**
- (h) Compile and share with host countries within and outside Europe good practices in addressing the situation of unaccompanied and separated children through a comprehensive welfare system including the rights to health and education.**

78. In relation to age-assessment processes in disputed-age cases of allegedly separated children who seek asylum, the Special Rapporteur recommends that the Government:

- (a) Elaborate statutory guidance on a holistic and multiagency approach to age assessment to be applied in disputed cases of allegedly separated children who seek asylum; ensure that such children are able to access formal age assessment procedures and, accordingly, take all necessary steps to ensure that appropriate referrals are made;**
- (b) Provide adequate support to social workers and other officials carrying out age assessment and training on issues such as cultural and religious sensitivity, child protection and post-traumatic treatment;**
- (c) Recognize the benefit of the doubt in disputed cases of allegedly separated and unaccompanied children who seek asylum and, accordingly, apply the principle in *dubio pro infante*, recognize that in disputed-age cases the burden of proof is on the Government and accordingly suspend the application of UKBA asylum instruction 2.2 on age assessment, which instructs that “the claimant should be treated as an adult if their physical appearance/demeanour very strongly suggests that they are significantly over 18 years of age”;**
- (d) Provide specific guidance and training at ports and screening units for the treatment of disputed-age cases and ensure that age is not assessed in screening units or at ports but by specialized units specifically created for that purpose.**

79. In relation to the protection and assistance of victims of trafficking in persons, the Special Rapporteur recommends that the Government:

- (c) Take all necessary steps to grant specialized support and assistance to all victims of trafficking for sexual exploitation and forced labour, regardless of their immigration status;**
- (d) Strengthen efforts to ensure that victims of trafficking and/or forced labour have access to effective remedies, including the possibility of pursuing compensation claims regardless of their immigration status;**

⁴ Changes introduced by the new asylum model include timing any granting of limited leave to expire when children reach 17 and a half years. See, *inter alia*, Home Office, “Planning Better Outcomes and Support for Unaccompanied Asylum Seeking Children”, 2007, para. 41.

80. In relation to the protection of women in the context of migration, the Special Rapporteur recommends that the Government:

- (a) Implement the recommendations made by the Committee on the Elimination of Discrimination against Women⁵ in particular, to keep under review and carefully monitor the impact of its laws and policies on women migrants, refugees and asylum-seekers with a view to taking remedial measures that effectively respond to the needs of those women;**
- (e) Ensure protection on the grounds of gender-related persecution, including violence against women and consider granting access to public services, particularly health-care services, public housing and social security benefits to migrant women with an insecure immigration status who are victims of violence;**

81. In connection with the protection of refused asylum-seekers and migrants in an irregular situation, the Special Rapporteur recommends that the Government:

- (a) Follow the several country-specific guidelines issued by UNHCR, in order to avoid returning refused asylum-seekers whose appeals have been exhausted to countries where they may be at high risk of human rights violations;**
- (b) Address the concerns expressed by the Committee on Economic, Social and Cultural Rights regarding the low level of support and difficult access to health care for rejected asylum-seekers⁶ by fully implementing the recommendations from the joint review carried out by the Department of Health and the Home Office on access to the National Health Service by foreign nationals,⁷ and by ensuring that refused asylum-seekers are not left destitute while they remain in the United Kingdom.**

A/HRC/7/10/Add.3

Report of the Special Rapporteur on freedom of religion or belief, Mission to the United Kingdom of Great Britain and Northern Ireland, Asma Jahangir

7 February 2008

Refugees and asylum-seekers

79. The Special Rapporteur was informed that asylum claims in the United Kingdom, including those based on well-founded fear of religious persecution, are subject to rigid scrutiny and that few applications are successful in the initial decision or in the appeal procedure. Since there is no official data available on how many asylum-seekers sought asylum in the United Kingdom on grounds of religious persecution, further research and aggregated data collection may be useful in order to analyse the issues involved with regard to freedom of religion or belief. Such research by the Government, civil society or academia may also deal with the situation of individuals converting after their departure from their country of origin and their refugee *sur place* claims. The Special Rapporteur would like to reiterate

⁵ A/63/38, paras. 295–296.

⁶ E/C.12/GBR/CO/5, para. 27

⁷ See “Access to NHS Services for foreign nationals”.

that a post-departure conversion should not give rise to a presumption that the claim is fabricated and the immigration authorities should evaluate the genuineness of the conversion on a case-by-case basis taking into account the applicant's past and present circumstances. Furthermore, the Special Rapporteur stresses the importance of reliable interpretation services and the impartiality of interpreters in order to avoid serious disadvantages for the asylum-seekers.

80. With regard to country of origin information, the Special Rapporteur welcomes the fact that the Operational Guidance Notes as well as the Country of Origin Information Service are publicly available. For the whole asylum determination process it seems crucial not only to have accurate and objective but also up-to-date information on asylum-seekers' countries of origin. The Special Rapporteur would like to emphasize that case adjudicators should not exclusively base their decisions on these selected sources, especially when the situation in the country of origin or the region in question has allegedly changed since they were last updated. With regard to immigration detention or removal centres, especially when their management is contracted out to a private company, the Government should monitor if the religious needs of the detainees are in fact met.

**Human Rights Liaison Unit
Division of International Protection
UNHCR
November 2011**