

## Inhuman and Degrading Treatment of Asylum-seekers and Refugees: a British tradition

**STOP PRESS:** On 24th March, just as this Briefing was being finalised, the Home Secretary outlined her plans for her reform of the asylum system. The system is already disgraceful: people recognised as 'refugees' have to wait 5 years before they can apply for Indefinite Leave to Remain, at which point their case can be refused; and those who are accepted as having a valid reason to remain in the UK (despite the hostile system they have gone through over many months, and sometimes years before that) have to wait 10 years before they can apply for Indefinite Leave to Remain, with their cases being reviewed every 2.5 years during that time, with exorbitant fees being demanded on each renewal.

The new proposals are in breach of the UK's commitments under international law. Refugees often have no choice about how they can come to this country, but the proposed laws will make them liable for removal even if they are granted asylum, if they have arrived by routes deemed to be "illegal". Instead of "refugee status" they would be granted temporary protection with regular reassessment for removal from the UK. They would have limited family reunification rights and limited access to benefits.<sup>12</sup>

When you read the recent history of the UK's treatment of asylum-seekers outlined below, this development will not come as a surprise.

---

Early in 2021, the revelations that asylum-seekers were being held in sub-standard army barracks caused an outcry which forced the government to modify its actions. This Briefing does not report in detail on that situation, which has been widely reported and documented, but looks at some recent history and at other aspects of the situation of asylum-seekers in the UK.

There is nothing new in the UK's "inhuman and degrading treatment" of asylum-seekers even though this is in contravention to the commitments our governments have made under international Conventions. Over the last decade and a half, the government has been found guilty of violations of these commitments and indeed the level of "inhuman and degrading treatment" has escalated since the introduction of the "hostile environment" in 2013.

### What is "inhuman and degrading treatment" and how is it prevented?

**The European Convention on Human Rights** (a Convention of the Council of Europe) was ratified by the UK in 1951. Article 3 states clearly: *No one shall be subjected to torture or to inhuman or degrading treatment or punishment.*

**The UN Convention against Torture and Other Cruel, Inhuman and Degrading Treatment or Punishment** was ratified by the UK in 1988, re-affirming this in 2003 when it signed the Optional Protocol<sup>3</sup> which enabled the relevant UN Committee to have unrestricted access to information and to send investigatory visits to places of detention. The UN

---

<sup>1</sup> <https://www.theguardian.com/uk-news/2021/mar/23/migrants-entering-uk-illegally-to-be-liable-for-removal-at-any-time>

<sup>2</sup> <https://www.theguardian.com/uk-news/2021/mar/24/priti-patel-defends-inhumane-overhaul-of-uk-asylum-system>

<sup>3</sup> <https://www.ohchr.org/EN/ProfessionalInterest/Pages/OPCAT.aspx>

Committee Against Torture has made several visits to the UK, most recently in 2019 (see Q-CAT Briefing No. 62).<sup>4</sup>

The convention refers to *acts of cruel, inhuman or degrading treatment or punishment which do not amount to torture as defined in article 1, when such acts are committed by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity.*

**The Council of Europe Convention for the Prevention of Torture and Inhuman and Degrading Treatment** was ratified by the UK in 1989, less than two years after it was opened for signature. The Convention set up an international committee empowered to visit all places where persons are deprived of their liberty by a public authority. The Council of Europe is quite clear in its definitions:

**“Inhuman treatment”** must reach a minimum level of severity, and “cause either actual bodily harm or intense mental suffering.” It need not be deliberate nor inflicted for a purpose.

**“Degrading treatment”** involves humiliation and debasement as opposed to physical and mental suffering. As with inhuman treatment, it does not have to be deliberate.

Positive obligations under the Convention to avoid and prevent such treatment arise not only at government level but also at working level amongst those who are tasked with putting legislation into practice.

The UK’s own **Human Rights Act** (which entered into force in 2000) also includes the prohibition of torture and inhuman and degrading treatment or punishment. The UK Equality and Human Rights Commission adds: *Degrading treatment means treatment that is extremely humiliating and undignified. Whether treatment reaches a level that can be defined as degrading depends on a number of factors. These include the duration of the treatment, its physical or mental effects and the sex, age, vulnerability and health of the victim. This concept is based on the principle of dignity - the innate value of all human beings.*

So, on paper it would seem that the UK has signed all the right documents and has even incorporated the prohibition of inhuman and degrading treatment into its own legal structures.

## **What does this actually look like in practice, however?**

### **Home Office policies on asylum-seekers**

In **2005**, the organisation *Justice* (set up in 1957 to promote the rule of law and the fair administration of justice) noted that the House of Lords upheld the decision of the courts that the government’s policy of waiting until an asylum-seeker’s destitution had reached the standard of inhuman or degrading treatment before reinstating support was in breach of Article 3 of the European Convention on Human Right (ECHR).<sup>5</sup> The Home Office had refused the claimants state support under Section 55 of the Nationality, Immigration, and Asylum Act 2002,<sup>[2]</sup> under the basis that the asylum-seekers did not make their claim “as soon as reasonably practical”. The court observed that due to this refusal of state support, the claimants were exposed to the risk of being homeless, were without access to food and were prevented from working while waiting for their application to be processed. These circumstances were thus considered by the Court of Appeal to be an Article 3 violation, and led the House of Lords to dismiss the Home Office’s subsequent Appeal with costs and grant state relief to the claimants. Following this judgment, asylum-seekers who apply late may

---

<sup>4</sup> <http://qcat.org.uk/wp-content/uploads/2019/08/Q-CAT-Briefing-No-62-August-2019.pdf>

<sup>5</sup> <https://justice.org.uk/asylum-human-rights/>

receive accommodation and financial support if the alternative is a real risk of destitution and a violation of their human rights.<sup>6</sup>

In **2005**, the British Psychological Society made a declaration noting that *torture victims may suffer from long-term multiple psychological and physical problems*. While the declaration was about the requirement for psychologists to take no part in any activities involving torture or inhuman and degrading treatment, their declaration clearly implies that they also have a duty towards torture victims who come to this country seeking sanctuary.<sup>7</sup> As has been pointed out in a previous Q-CAT briefing, successive UK governments go against their own legislation in detaining victims of torture (see Briefing No. 47 from October 2015)<sup>8</sup> and there is little evidence that the BPS has made a stand on this issue since then, in spite of the two Shaw Reports of 2016 and 2018.

In **2007**, the Parliamentary Joint Committee on Human Rights concluded that *by refusing permission for asylum-seekers to work and operating a system of support which results in widespread destitution, the Government's treatment of asylum-seekers in a number of cases reaches the Article 3 ECHR threshold of inhuman and degrading treatment (paragraph 120)*.<sup>9</sup>

The report went on: *Many witnesses have told us that they are convinced that destitution is a deliberate tool in the operation of immigration policy. We have been persuaded by the evidence that the Government has indeed been practising a deliberate policy of destitution of this highly vulnerable group. We believe that the deliberate use of inhumane treatment is unacceptable*.

One of the submissions considered by the committee was from Medact, which stated: *The Supreme/High court ruled that to withdraw support from asylum-seekers, hence leaving them destitute, amounted to a violation of Article 3. Asylum-seekers living in destitution were ruled to be suffering from inhuman and degrading treatment. Mental anguish caused by the stress of not being able to access healthcare for oneself or one's children might also be considered applicable under Article 3. Section 55 gives the power to remove all forms of support by the Home Office if an asylum-seeker did not claim asylum at the first opportunity. The current proposal to remove access to primary care from failed asylum-seekers would undoubtedly result in a denial of care*.<sup>10</sup>

As if this were not bad enough, in 2012 Theresa May, the then Home Secretary, announced the policy of developing a “hostile environment”. This included measures to limit access to work, housing, health care, bank accounts and more. A system of citizen-on-citizen immigration checks was introduced. Most of these proposals became law via the Immigration Act 2014, and have since been tightened or expanded under the Immigration Act 2016. Forcing asylum-seekers to live under these conditions certainly violates the “dignity” mentioned in the UK Human Rights Act.

## **Inhuman and Degrading Treatment in Immigration Detention and Removal Centres**

---

6

[https://en.wikipedia.org/wiki/R. \(Adam, Limbuela and Tesema\) v. Secretary of State for the Home Department](https://en.wikipedia.org/wiki/R._(Adam,_Limbuela_and_Tesema)_v._Secretary_of_State_for_the_Home_Department)

<sup>7</sup> <https://www.bps.org.uk/sites/www.bps.org.uk/files/Policy/Policy%20-%20Files/Declaration%20Concerning%20Torture%20and%20Other%20Cruel%2C%20Inhuman%2C%20or%20Degrading%20Treatment%20or%20Punishment%20%282005%29.pdf>

<sup>8</sup> <http://qcat.org.uk/wp-content/uploads/2016/07/Q-CAT-Briefing-No-47-October-2015.pdf>

<sup>9</sup> <https://publications.parliament.uk/pa/jt200607/jtselect/jtrights/81/81i.pdf>

<sup>10</sup> <https://publications.parliament.uk/pa/jt200607/jtselect/jtrights/81/81we14.htm>

## Indefinite detention

The lack of time limit on immigration detention is in itself an example of “inhuman and degrading treatment”, regardless of what the conditions are like in detention centres. The Shaw Review states: *Conditions of detention must be compatible with respect for human dignity and must not involve distress or hardship of an intensity that exceeds the unavoidable level of suffering inherent in detention.*<sup>11</sup>

In its submission to the UN Special Rapporteur on Torture in November 2019, the Centre of Human Rights Law at SOAS pointed out that *if indefinite detention is considered in itself arbitrary, its known adverse psychological consequences raise a prima facie case of ill-treatment. This is particularly the case where the asylum and immigration system in which it operates does not provide effective remedies and/or is dehumanising by treating the person concerned as a mere object of an immigration policy based on generic deterrence paradigms that are indifferent to individual suffering.*<sup>12</sup>

The emphasis on “individual suffering” is at odds with Home Office practice which seems to regard individuals as mere numbers.

## Situation in detention centres

In 2011, the High Court ruled, apparently for the first time, that detention at a UK immigration removal centre amounted to inhuman or degrading treatment in breach of article 3 of the European Convention on Human Rights.<sup>13</sup> An Indian national with a pre-existing mental condition was detained at Harmondsworth; the judge in the case ruled that his detention *involved both a debasement and humiliation of S since it showed a serious lack of respect for his human dignity. It created a state in S’ mind of real anguish and fear, through his hallucinations, which led him to self-harm frequently and to behave in a manner which was humiliating. It also led to his humiliating treatment in the hands of other detainees.*

The situation in immigration detention centres has been criticised by inspectors carrying out routine or unannounced visits. In April/May 2019 the United Nations Committee Against Torture expressed its concern that torture victims were routinely being detained and that the government’s own policy and regulations were proving ineffective.<sup>14</sup> The Committee also expressed its concern that there is no time limit on immigration detention.

The research group INQUEST has recorded a total of 37 deaths in immigration detention centres between 2000 and 2020.<sup>15</sup> Of those, 15 were self-inflicted, 17 were non-self-inflicted, one was a result of restraint, two were homicides, and two are awaiting classification. During the same period, a further 16 immigration detainees died in prisons, 13 of which were self-inflicted.

The Shaw Review into the Welfare in Detention of Vulnerable Persons (January 2016) cites six examples of cases between 2011 and 2014 in which the courts have ruled that Article 3 has been breached in respect to immigration detainees.<sup>16</sup>

## Escalation of “the hostile environment”

---

<sup>11</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/490782/52532\\_Shaw\\_Review\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/490782/52532_Shaw_Review_Accessible.pdf)

<sup>12</sup> <https://www.soas.ac.uk/human-rights-law/reports-research-projects-and-submissions/file144620.pdf>

<sup>13</sup> <http://www.bailii.org/ew/cases/EWHC/Admin/2011/2120.html>

<sup>14</sup> <http://qcat.org.uk/wp-content/uploads/2019/08/Q-CAT-Briefing-No-62-August-2019.pdf>

<sup>15</sup> <https://www.inquest.org.uk/deaths-of-immigration-detainees>

<sup>16</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/490782/52532\\_Shaw\\_Review\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/490782/52532_Shaw_Review_Accessible.pdf)

Now in 2021, it seems almost unbelievable that in 2007 the refusal of right to work would be mentioned as “inhuman and degrading treatment”, given the developments which have taken place since then. These include<sup>17 18</sup>:

- Cuts to legal aid, restrictions to judicial review and removal of appeal rights;
- Culture of disbelief within the Home Office where caseworkers are required to “find the lie” within the applicants’ accounts;
- Introduction of targets for removals;
- Redirection of resources away from casework teams and towards enforcement, indefinite detention and removal;
- Constant unannounced changes to regulations;
- requiring landlords to conduct immigration checks on potential tenants; requiring doctors to assess the immigration statuses of the sick before they were treated; the introduction of bank checks, driving licence checks, employment checks;
- The 2013 Operation Vaken campaign involving billboard vans with the warning “go home or face arrest”, the branding of immigration enforcement vehicles to look like police cars, adverts and posters in minority ethnic newspapers, shop windows and in buildings used by faith and charity groups.
- The introduction in 2015 of extortionate fees for renewal of Discretionary Leave to Remain, citizenship applications, and “health surcharge”.

The campaign group “Free Movement” has identified one of the main pillars of the “hostile environment” as the switch from a system whereby immigration control was carried out at the border by trained officials to a situation whereby private citizens and public servants must now regularly check the immigration status of other people.<sup>19</sup>

All of this adds up to a climate where *the principle of dignity - the innate value of all human beings*, claimed as the basis of the UK Human Rights Act, is now ignored and asylum-seekers are routinely subject to debasement, humiliation, and mental suffering.

### **No recourse to public funds**

In some cases, the Home Office allows people to stay, but with no recourse to public funds (NRPF). Although this is a long-established policy, it was revealed during 2020 that the Prime Minister was unaware of this condition. He has recently stated that those who fall under NRPF are here illegally, which is untrue.<sup>20</sup> NRPF is applied, for example, to people who are granted Leave to Remain as a student, a spouse, or family member. There is also a risk that when applying for renewal of Discretionary Leave to Remain (DLR, see below) people who exhaust their savings and the savings of friends and family in order to pay the extortionate Home Office fees, will be deemed not to need recourse to public funds. In 2020, judges found that this situation forces families and children into extreme poverty and amounts to inhuman and degrading treatment.<sup>21</sup> The Court noted that the rights involved were “*so basic*” they had been recognised two centuries earlier by Lord Ellenborough in *R v Inhabitants of Eastbourne* (1803) 4 East 103, who held: *As to there being no obligation for maintaining poor foreigners... the law of humanity, which is anterior to all positive laws, obliges us to afford them relief, to save them from starving.*

---

<sup>17</sup> <https://www.politics.co.uk/comment-analysis/2018/05/08/this-is-what-the-hostile-environment-did-to-asylum-seekers/?cmpredirect>

<sup>18</sup> <https://www.theguardian.com/uk-news/2018/aug/27/hostile-environment-anatomy-of-a-policy-disaster>

<sup>19</sup> <https://www.freemovement.org.uk/briefing-what-is-the-hostile-environment-where-does-it-come-from-who-does-it-affect/>

<sup>20</sup> <https://www.independent.co.uk/news/uk/home-news/boris-johnson-nrpf-migrant-b1787219.html>

<sup>21</sup> <https://ukhumanrightsblog.com/2020/06/03/the-law-of-humanity-home-office-no-recourse-to-public-funds-policy-ruled-unlawful/>

## New arrivals

At the end of 2020, four separate independent monitoring boards reported that asylum-seekers arriving by sea in small boats were being subjected to inhumane treatment.<sup>22</sup> This was the first time that the whole process had been assessed. The reports included new arrivals being held in crowded conditions with no possibility of social distancing, administrative errors, asylum-seekers being moved from one detention centre to another with untreated broken bones, burns and cancer. In the second half of 2020, over 50% of 80 individuals were deemed a suicide risk.

## Deportations

The UK government does not hesitate to deport people to countries where they might be at risk of torture, and in 2005 Article 3 of the ECHR was extended to cover conditions of impoverishment and social decay in non-Convention states, thus including access to essential medical treatment.<sup>23</sup>

There are well-documented cases of the deaths of asylum-seekers either during or following deportation. In 2020, some asylum-seekers were put on flights before a vulnerability assessment had been completed. One man, who had been on suicide watch, poured boiling water on his legs just before the flight but was still put on the plane. Others who attempted suicide were taken to hospital just before their flight, then taken from hospital straight to the flight.

## Accommodation for asylum-seekers

Information about inadequate accommodation offered to asylum-seekers can be easily found online. For example, in 2008, Peter Dwyer and David Brown's report on the experiences of refugees in Yorkshire highlighted serious problems with accommodation<sup>24</sup>; in 2014, G4S and Serco faced a £4 million penalty for offering substandard accommodation to asylum-seekers<sup>25</sup>; in 2017, asylum-seekers were found to be crowded into properties infested by rats, mice and insects<sup>26</sup>.

The fact that many asylum-seekers (especially families) are put in adequate accommodation should not blind us to the fact that thousands of others are housed in degrading circumstances which the Home Affairs Committee has called "a disgrace".

During the pandemic, the situation has only become worse, and the use of military barracks to house asylum-seekers, including victims of torture,<sup>27</sup> was only the latest development, and possibly an inevitable one with a Home Secretary who had contemplated sending asylum-seekers to St Helena or using nets to capture people crossing the Channel in small boats. In spite of a public and media outcry and legal challenges brought by some of those who were directly involved, the Home Office intends to continue to use these sites, with the response

---

<sup>22</sup> <https://www.theguardian.com/uk-news/2020/nov/13/asylum-seekers-crossing-channel-face-inhumane-treatment-observers-say>

<sup>23</sup> <https://ukhumanrightsblog.com/incorporated-rights/articles-index/article-3-of-the-echr/>

<sup>24</sup>

[https://www.migrationyorkshire.org.uk/userfiles/file/PolicyandResearch/YHRMP\\_Reports/YH\\_RefugeeFocusGroups\\_Nov08.pdf](https://www.migrationyorkshire.org.uk/userfiles/file/PolicyandResearch/YHRMP_Reports/YH_RefugeeFocusGroups_Nov08.pdf)

<sup>25</sup> <https://www.independent.co.uk/news/uk/home-news/g4s-and-serco-face-ps4million-penalty-over-substandard-accommodation-asylum-seekers-9051174.html>

<sup>26</sup> <https://www.bbc.co.uk/news/uk-politics-38799694>

<sup>27</sup> <https://blogs.bmj.com/bmj/2021/02/08/housing-asylum-seekers-on-disused-army-barracks-puts-them-at-risk-of-covid-19/>

of the Home Secretary showing a callous lack of understanding unprecedented even for this government.<sup>28</sup>

### **Continued mental torment in the renewal process**

Even when temporary status has been granted, the road to acquiring permanent settlement is full of tricks, traps, and humiliations, causing significant ongoing stress and worry for those involved. This is **after** the grant of temporary Discretionary Leave to Remain, which is a separate status from being recognised as a refugee.

Many of those recorded as being “accepted “ each year have been allowed on a secondary status of rights to family and private life under Article 8 of the European Convention, under Rule 326B of the asylum rules. This is the so-called Discretionary Leave to Remain (DLR). These individuals and families will have to renew three times over seven-and-a-half years at punitive fee costs (£2,600 per capita in one-time payments regardless of age), and a fourth time at a fee of £2,404 per capita after 10 years. A complicated fee waiver system exists for the first three payments, but there are no exemptions for the fourth and last one.

Greatly swelling the numbers of those granted DLR are large numbers of candidates who are granted the same status many years after they applied (having had to wait in limbo, in some cases, for over 20 years) as a result of inevitable changes in their private and family life which have led to successful further submissions and further appeals. They then start the same ten-year long march as described above.

On each two-and-a-half year renewal of status, these individuals and families are confronted with a bewildering array of half-a-dozen online Further Leave to Remain (FLR) forms, from which they must correctly pick out Discretionary Leave (FLR DL). There are no paper versions of these forms, so they can be viewed initially only a page at a time.

There are many indications on the form that this is not a routine renewal, but a selection process which can be failed by the candidate. At the outset there is a routine warning that all reasons for wishing to stay longer must be communicated now, as they will be ruled out of time if added later. Details of a country-of-origin passport or ID card, or UK travel document are requested, despite the fact that many candidates will have none of these; an explanation must be formulated (in adequate English) for the absence of these identifiers. Dates the candidate moved into and out of previous addresses must be supplied.

And then there is a mysterious question “Do you have any family in your country of birth, nationality or any country where you have lived for more than five years?”. The applicant is expected to give the name and addresses of these family members and describe how they are in contact with them. This is followed by an identically phrased question about “friends” and then one about social or cultural groups with which the candidate is in contact. An explanation is requested as to why the applicant and any dependents are applying to remain in the UK and they must list any absences from the country of over three months duration and their reason. Any convictions and minor penalties must be listed, followed (bizarrely) by war crimes, genocide, terrorism or sympathy with it, and declarations that the applicant has read definitions of these crimes. Finally, other reasons, if any for wishing to remain must be stated.

In short, the renewal process is more than a little threatening and is highly depersonalised. The process itself requires good access to and command of technology and the English language and, above all, a large sum of money, unless a complex fee exemption process is added on an additional form.

---

<sup>28</sup> <https://www.theguardian.com/uk-news/2021/feb/24/covid-cases-among-asylum-seekers-at-napier-barracks-higher-than-thought>

## Not just in the UK....

This concern goes beyond our borders, as indicated in an open letter by leading European psychologists addressed to the European Parliament and to the heads of government of the EU Member States, the UK and Switzerland. They are calling for a revision of the European detention policies against refugees, as the psychological consequences are destructive for everyone.<sup>29</sup>

## In conclusion....

The Home Office has said: *“We are committed to fixing the broken asylum system, to make it firm and fair, compassionate to those who need help and welcoming people through safe and legal routes.”*<sup>30</sup>

The politician Tim Farron, on the other hand, has recently written: *“If we have any compassion and humanity left as a nation, we need to be shouting about this from the rooftops. We need to shame this government into treating refugees not as invaders or vermin, but as human beings, each with a name and a history, each living a life wrecked by circumstances, but of just as much value as every other person living on these shores.”*<sup>31</sup>

So let us compare these two statements. The government refers to “safe and legal routes” – ignoring the fact that its own legislation and that of other countries has made safe and legal routes impossible. Tim Farron, an Evangelical Christian, has spoken out more strongly than our Quaker MPs and calls upon us to “shame this government”.

How can we “shame the government”?

Our tried and tested way of working is to **contact our MPs**, and this is something we need to continue to do. For this, we need up-to-date and accurate information, which can be found on the websites below.

If you work with **other denominations or faith groups**, use these links to approach faith leaders about these concerns. Archbishops who sit in the House of Lords can be useful allies and some have already spoken out. Follow up links to those parts of CTBI (Churches Together in Britain and Ireland) who are working on these issues (Churches Refugee Forum, Scottish Faiths Action for Refugees).

If there is a **support group for asylum-seekers and refugees** in your area, please contact them to see how you can offer support.

If you are a **psychologist**, see how you can support the signatories of the open letter.

If you have **contacts in other European countries**, work with them on these concerns.

Sign up to organisations which regularly campaign on asylum and refugee issues. The Asylum Matters website is always full of information, and you can sign up to their fortnightly updates. <https://asylummatters.org/>

The Quaker Asylum and Refugee Network will keep you informed about Quaker activities: <http://qarn.org.uk/> And of course, not to forget: <https://www.freedomfromtorture.org/>

Briefings are prepared and/or edited on behalf of Q-CAT Trustees by  
Barbara Forbes [forbesbarbarae@yahoo.co.uk](mailto:forbesbarbarae@yahoo.co.uk) John Cockcroft [jandbcockcroft@talktalk.net](mailto:jandbcockcroft@talktalk.net)  
The next Newsletter is planned for June; the next Briefing for mid-July. Website <https://q-cat.org.uk> <https://qcat.org.uk>

---

<sup>29</sup> [‘Bring an end to the inhuman disregard...’ | The Psychologist \(bps.org.uk\)](#)

<sup>30</sup> <https://www.theguardian.com/uk-news/2020/nov/13/asylum-seekers-crossing-channel-face-inhumane-treatment-observers-say>

<sup>31</sup> <https://www.politics.co.uk/comment/2021/02/09/refugees-as-invaders-britains-inhumane-asylum-system/>