

POLICY BULLETIN 28

Providing travelling expenses and reimbursing essential travel costs

1. SCOPE OF THE DOCUMENT

- 1.1. The purpose of this document is to provide guidance for the Travel Teams when either arranging travel or reimbursing essential travel costs for persons who are supported by UK Border Agency under the Immigration and Asylum Act 1999, sections 95 and 98.
- 1.2. This document incorporates Policy Bulletins 56 & 66, which have now been withdrawn.

2. Overview

- **The Travel Bureau**: arrange individual journeys for “self write” dispersal to Asylum Support accommodation and travel to Tribunals Service – Asylum Support appeal hearings at Christopher Wren House. Reimbursements are arranged by the Travel Bureau only.
 - **The Croydon Interview Booking Unit (IBU)**: arrange travel for supported persons to substantive asylum interviews in Croydon.
 - **The Liverpool IBU**: arrange travel to substantive asylum interviews in Liverpool as well as travel to all asylum appeal hearings, bail hearings and appointments with Freedom from Torture.
- 2.1. **Substantive asylum interviews and Tribunals Service – Asylum Support appeal hearings**: travel tickets are normally sent to applicants together with details of the interview or hearing so there is usually no need to make an application for a travel warrant in such circumstances.
 - 2.2. **Asylum appeal hearings, bail hearings and appointments at Freedom from Torture**: an application for a travel warrant will need to be made to Liverpool IBU as soon as the details of the hearing/appointment are known. Liverpool IBU need to receive such applications at least four working days before the date of travel. Where there is not enough time to issue a travel warrant the asylum seeker, One Stop Service, local authority or accommodation provider or the asylum seeker’s solicitor may decide to pay for the cost of travel and this may be reimbursed in certain circumstances (see paragraphs 10.14 – 10.18 below).
 - 2.3. Annex C sets out the relevant legislation which allows the UK Border Agency to provide the cost of travel in particular cases.

- 2.4. There may be occasions when overnight accommodation is booked for some travellers (see paragraph 9.14 below).
- 2.5. The UK Border Agency travel teams do not arrange for travel to solicitors appointments, medical appointments, criminal court cases, travel to reporting centres and travel in relation to a voluntary departure or removal. Where there are exceptional circumstances, travel expenses may be approved by a UK Border Agency travel team manager.
- 2.6. UK Border Agency Travel Bureau, Liverpool IBU and Croydon IBU have direct links to Carlson Wagonlit for rail bookings. UK Border Agency Travel and Croydon IBU also have direct links to National Express for coach bookings.
- 2.7. Along with the Asylum Support computer systems, the travel teams have access to specialist software to assist them to book various modes of transport and plan routes.
- 2.8. Individual journeys for appeals, interviews etc will be tailored to the most appropriate (usually most economical) way of meeting the requirements of the individual. The journey can be made by either coach or rail, or possibly a combination of both although travel for Asylum Support appeal hearings is always by rail. For example, travellers arriving at London Victoria Coach station may complete their journey to East Croydon by train.
- 2.9. UK Border Agency Travel Officers will normally:
 - arrange the journeys via rail or National Express coaches,
 - write out the tickets for National Express where necessary, *
 - produce a detailed journey plan where necessary, *
 - arrange hotel bookings via Expotel where necessary,
 - record the date the travel tickets were issued and the journey destination on ASYS,
 - maintain a system which allows an audit trail of which ticket was issued to whom etc,
 - travel officers do not book business travel tickets for staff members.

3. Individual Journeys to Asylum Support Accommodation

- 3.1. Some supported asylum seekers receive an individually tailored journey to their dispersal accommodation, arranged by the UK Border Agency Travel Bureau (often referred to as the “self write” process). The journey will either be made by National Express coaches or rail arranged via Carlson Wagonlit. The dispersed asylum seekers are then met by the accommodation providers at pre-determined drop off points.

4. Asylum Support Interviews

* except Liverpool IBU – who do not arrange travel with National Express and do not have the specialist software to produce a detailed journey plan.

- 4.1. Some asylum seekers may be interviewed by UK Border Agency staff for the purpose of investigating fraud or a breach of conditions. Such interviews will often take place in the asylum seeker's accommodation but some interviews may take place in a UK Border Agency office. Travel expenses may be provided if the circumstances of the particular case are exceptional. This might be for example, where the person has to travel outside his or her local area.

5. Individual journeys for interviews etc for asylum seekers supported under section 95 or section 98

- 5.1. Asylum seekers who are supported by the UK Border Agency under section 95 or section 98 (i.e. in an Induction Centre or in initial accommodation) may apply for travel tickets when they need to travel to:

- a substantive asylum interview (although travel tickets are normally automatically sent to the asylum seeker with details of the interview),
- an asylum appeal hearing,
- an Asylum Support appeal hearing (although travel tickets are normally automatically sent to the asylum seeker with details of the hearing),
- an appointment with Freedom from Torture - see section 8 for eligibility,
- the bail hearing of a spouse or other dependant,
- their own bail hearing – see section 96(1)(d).

- 5.2. The dependants of an asylum seeker supported by the UK Border Agency, may also apply for a travel ticket to enable them to attend bail proceedings in connection with the detention of the asylum seeker or the asylum seeker's dependant under any provision of the Immigration Acts.

6. Payment of travel costs to asylum seekers not on ASYS

- 6.1. There will be occasions where asylum seekers are invited to attend substantive asylum interviews, asylum appeal hearings and appointments at Freedom from Torture before completion of their Asylum Support application form. This means that they may not be registered on ASYS.
- 6.2. In such cases the travel costs can be met if the asylum seeker is residing in either EA or an Induction Centre.
- 6.3. If the asylum seeker is not yet registered on ASYS, a manual record should be kept of any travel that is arranged.

7. Travel to section 4 accommodation

- 7.1. In the majority of cases travel to section 4 accommodation is arranged by the accommodation provider. However there may be some instances where the accommodation provider is unable to arrange the travel. In such circumstances the Post Allocation Casework Team 1 (PAC1) may be contacted by fax on 020 8604 6907. PAC 1 will liaise with the Travel Bureau who will issue travel tickets in appropriate cases.

8. Freedom from Torture cases

- 8.1. Travel to appointments with Freedom from Torture is arranged by Liverpool IBU. Liverpool IBU do not have Asylum Support paper files, and must therefore ensure that ASYS is minuted with travel details.
- 8.2. Liverpool IBU may issue travel tickets (normally a bus ticket) to asylum seekers supported under section 98 (they will normally be in emergency accommodation) and residing in the Greater London area to enable them to attend an appointment with Freedom from Torture.
- 8.3. An asylum seeker who is supported under section 95 and living in the Greater London area would normally be expected to meet the cost of the bus fare (local travel) from their weekly allowance.
- 8.4. Consideration may be given to granting a travel ticket on an exceptional basis if the supported asylum seeker has a confirmed appointment with Freedom from Torture, following a referral from a GP and is living outside the Greater London area.
- 8.5. Payment of travel costs may also be considered when a supported asylum seeker living outside the Greater London area is invited for reassessment after being placed on the Freedom from Torture waiting list.
- 8.6. Please also see paragraphs 4.1 – 4.4 of Policy Bulletin 19 on payment of travel costs when attending Freedom from Torture for an assessment in connection with the asylum claim.

9. HOW TRAVEL IS ARRANGED

Travel Warrant applications

- 9.1. Wherever possible travel tickets will be included in the letters of invitation to attend substantive asylum interviews. Otherwise the supported asylum seeker should apply for a travel warrant.
- 9.2. Travel warrant applications for substantive asylum interviews in Liverpool, asylum appeal hearings, bail hearings and Freedom from Torture appointments must be sent to Liverpool IBU as soon as possible before the date of travel to allow sufficient time for the travel warrant to be issued. However, the travel warrant application must be received 4 working days **before** the date of travel by Liverpool IBU. Evidence of the need to travel should be sent with the travel warrant application to :

UK Border Agency
PO Box 285
Reliance House
Walter Street
Liverpool
L2 8XU

Tel no : 0151 237 0013

Fax no : 0151 237 0464

- 9.3. If travel tickets for substantive asylum interviews in Croydon are not received, the supported asylum seekers should apply for a travel warrant. The application and a copy of the evidence of the need to travel should be sent to Croydon IBU as soon as

possible to allow sufficient time for the travel ticket to be issued. The application should be sent to :

UK Border Agency
IBU – Lunar House
2nd Floor
40 Wellesley Road
Croydon
CR9 6EL

Tel no : 020 8604 5254 Fax no : 020 8 604 5754

- 9.4. Travel tickets for Asylum Support appeal hearings at Christopher Wren House are normally issued with the letter of invitation. If the tickets are not received the supported asylum seeker should apply for a travel warrant. The travel warrant application and a copy of the evidence of the need to travel should be sent to:

Travel Team
Quest House
11 Cross Road
Croydon
CR9 6EL

Tel : 020 8633 0683

Fax : 020 8633 0941

Evidence of need for travel

- 9.5. The applicant must include a copy of the letter inviting them to attend as evidence of their need for a travel ticket. The travel officer must check that the applicant is required to attend and if so will make the necessary arrangements.
- 9.6. If no proof of the need to travel has been included with the application, the travel officer will reject the application and write to the applicant advising them to resubmit their application with the necessary evidence.

Planning the journey

- 9.7. Travel officers should not book journeys where the supported person would be required to catch a coach or train before 6.30am or arrive home after 9.30pm. The traveller should also arrive in good time for the appointment and at least 30 minutes before it is due to start.
- 9.8. Travel officers should allow on average 3 hours for each appointment. Appeal hearings do not usually go beyond 4.30pm unless there is a delay and Asylum interviews normally start as late as 4.30pm but are usually completed by 7pm.
- 9.9. When planning the journey the travel officer must take into account the make up of the family group, any care needs and the most appropriate (usually most economical) way of completing the journey. Normally only the principal applicant will need to travel to an interview or appeal, although the applicant may need to bring their children along if there is nobody to care for them in their absence. In asylum appeal cases the dependants are often required to attend to give evidence.

- 9.10. The travel officer should use the rail, coach and tube planner to decide the most appropriate journey. Tickets will be booked through the internet for National Express coaches and through Carlson Wagonlit for rail. All journeys arranged by Liverpool IBU are by rail.
- 9.11. If a rail journey includes an underground trip, this can be incorporated within the Carlson Wagonlit ticket. If, however, the main journey is by coach or starts/ends at an underground station, a London Transport carnet ticket is issued for each single underground journey within zone 1 of the underground.
- 9.12. The travel ticket issued takes the traveller from their local coach or rail station to the station closest to their destination, including, where necessary, the across London transfers. The applicant is expected to meet the cost of local journeys. For example for a journey from Glasgow to Croydon, a rail ticket from Glasgow to East Croydon would include the Underground journey between Euston and Victoria. It would not include the journeys from the UK Border Agency accommodation to the Glasgow railway station or from East Croydon to the Croydon office.

Journey Plan

- 9.13. Once the journey has been arranged and the tickets printed or written, the travel officer should, if necessary prepare a journey plan to send to the applicant with the travel tickets. This may simply consist of the itineraries produced from the specialist software – rail, coach and tube planner – or if the journey is complicated, the travel officer may produce bespoke instructions. If using Carlson Wagonlit a basic journey plan is printed on the travel tickets.

Overnight Accommodation

- 9.14. In some circumstances, it may be difficult for the traveller to complete their return journey in one day, especially if an early appointment has been booked (see paragraph 9.7. above). If it is not possible for the person to arrive in time for their appointment if they were to set off at 6.30am, arrangements must be made for the person to travel to the location the day before the appointment and they should be booked into overnight accommodation in the local area.
- 9.15. If the person's appointment is in the afternoon and it is not possible for the applicant to reach their homeward destination by 9.30pm, they should be booked overnight accommodation and return the following day.
- 9.16. The travel officer can arrange overnight accommodation via an agency called Expotel who will arrange a hotel on the UK Border Agency's behalf. The accommodation arranged is on a bed and breakfast basis. The account is paid by the UK Border Agency direct and the person is not allowed to charge any other expenses to the UK Border Agency. They are expected to meet any additional costs themselves e.g. lunch, local travel and telephone calls. The hotel reservation and directions should be included in the travel pack that is sent to the applicant.

Carlson Wagonlit Travel – Rail

- 9.17. To arrange travel by rail, travel officers should send Carlson Wagonlit the details of the specific journey requirements. Carlson Wagonlit then issue the appropriate ticket which is printed on the travel teams designated printer.

Children

- 9.18. If travelling by rail, children under 5 years of age do not require a ticket. If travel is arranged for children over 5 years of age, but under 16 years of age, "child" should be written in the top right hand corner of the ticket.
- 9.19. If travelling with National Express a child under 3 does not require a ticket if they are not occupying a seat.

National Express Bookings, self-write tickets

- 9.20. When making a booking with National Express the journey is planned and booked via the National Express website. National Express travel tickets are "self write" tickets.
- 9.21. Each stage of the journey requires a ticket. The ticket book contains 4 tickets therefore a maximum of 4 journeys. If groups and families are travelling together one ticket book per group may be completed rather than one ticket per traveller.
- 9.22. If any of the 4 tickets in the book are not being used the word 'void' should be written in the green box and the spare tickets must be removed. The void tickets are attached to the travel officer's copy and stored. Travel officers must not make amendments to the tickets.
- 9.23. A list of cancelled tickets is sent to National Express on a monthly basis for refund.

Special Travel Arrangements for people in Oakington

- 9.24. Travel for asylum seekers in Oakington is arranged at Oakington by the Duty Co-ordinator. Departing asylum seekers travel by either coach or rail. A shuttle bus is on hire to the UK Border Agency to transport asylum seekers to Cambridge train station.

10. REIMBURSEMENT OF TRAVEL COSTS

General

- 10.1. When it has not been possible to issue a travel ticket in time or make alternative arrangements, the UK Border Agency may consider offering to reimburse the asylum seeker the cost of their travel. The travel officer must advise asylum seekers that they are expected to take the most appropriate (usually most economical) form of transport and that reimbursement may not be made if this is not done. The asylum seeker must be advised to retain any tickets or receipts and a copy of the letter inviting them to attend the interview, hearing or appointment and that any reimbursement will be included in their subsistence support payment. When this is not possible payment will be in the form of Interim Support Tokens (ISTs).

- 10.2. An asylum seeker wanting reimbursement of their travelling costs must submit their claim in writing to the Travel Bureau and must provide evidence. The evidence should include the letter of invitation and the evidence of the cost of travel. Claims by telephone will not be accepted. Contact details for the Travel Bureau can be found at 9.4.
- 10.3. Travel Officers must confirm that the asylum seeker:
- is an asylum seeker supported by the UK Border Agency, under sections 95 or 98 – refer to sections 5 and 8 for eligibility;
 - is required to attend the interview, hearing or appointment on the appointed date;
 - has evidence of any particular needs. This should only be examined if this has meant that additional expense has been incurred and it should normally be identified on ASYS.
- 10.4. If an asylum seeker has funded their own travel, travel officers may need to establish how they could have afforded to do so. Travel officers should check ASYS to see whether the supported person has any declared funds.

Reimbursement of travel costs to asylum seekers not on ASYS

- 10.5. As per paragraph 6, if an asylum seeker is residing in either EA or an Induction Centre and is invited to attend a substantive asylum interview, asylum appeal hearing or appointment at Freedom from Torture before completion of their Asylum Support application form and travel tickets have not been issued, the asylum seeker is able to claim for reimbursement of their travel costs.
- 10.6. Refer to paragraph 8 when reimbursing costs for travel to Freedom from Torture appointments.
- 10.7. The Travel Bureau should keep a manual record of all reimbursements that are made when the asylum seeker is not registered on ASYS.

Calculating the level of reimbursement of travel costs

- 10.8. When calculating the cost of travelling, travel caseworkers should adhere to the following points :
- the fare should normally cover just the main cost of travel;
 - it should cover the cost of the most appropriate transport (usually most economical), e.g. coach, train or even a plane if more economical;
 - it should normally exclude any travel costs of journeys of less than 3 miles (e.g. the journey to the station);
 - it should exclude expenses for refreshments or special classes of travel, such as first class;
 - ignore any travel discount that the IBUs or the Travel Bureau may receive.
- 10.9. Exceptions to the above points:
- Where there is evidence that the asylum seeker requires special travel arrangements such as taxis or overnight accommodation. ASYS may indicate such needs. Travel officers must check with the travel manager before authorising these costs.

- When reimbursement for overnight accommodation is sought, the travel manager must give authority.

10.10. Reimbursement of travelling costs may include:

- the reasonable travelling costs of any witnesses a supported asylum seeker has called to attend their asylum appeal hearing or their Asylum Support appeal hearing. (See paragraph 2.4, Section 103(9) covers any reasonable travelling expenses incurred by appellants, such as there having the travelling costs of witnesses attending their hearing. The exception will be if the adjudicator directs that the presence of a witness is unnecessary),
- the reasonable cost of travelling to a destination when the UK Border Agency has been unable to provide travel tickets for the complete journey and the shortfall exceeds a continuous journey of 3 miles,
- the reasonable travelling costs of any dependants of a detained asylum seeker attending the asylum seekers bail hearing,
- in exceptional circumstances, asylum seekers may also apply for reimbursement of travel costs for their dependants where it was necessary for their dependants to travel with them, because of age, care needs etc.

10.11. Reimbursements will be limited to the above costs. Other irrelevant claims will not be met.

10.12. If the Travel Bureau have approved the claim and calculated the travelling costs, they must ensure that ASYS is updated. A letter should be sent to the asylum seeker informing them that their claim has been approved. The Travel Bureau will then include the reimbursement in the asylum seeker's support payment. When this is not possible ISTs will be issued.

10.13. If the Travel Bureau are not satisfied with the claim for reimbursement they should write to the asylum seeker refusing payment.

Claims from One-Stop Services, Local Authorities or Accommodation Providers

10.14. Where a One-Stop Service, local authority or accommodation provider has funded an asylum seeker's travel to attend a substantive asylum interview, asylum appeal hearing, asylum support appeal hearing, bail hearing or appointment with Freedom from Torture, they should be invited to submit an invoice to Finance in order to recover their costs.

10.15. The One-Stop Service, local authority or accommodation provider should obtain agreement to fund the travel in advance, with either the IBUs or Travel Bureau who will then authorise a request to purchase form. The IBUs and Travel Bureau can authorise a request to purchase form if the amount is under £100. Any requests over £100 must be authorised by Finance prior to the ticket being purchased. Authorised request to purchase forms will be sent to Finance at the end of each week for Finance to await the invoice.

10.16. For travel to substantive asylum interviews in Liverpool, asylum appeal hearings, bail hearings and appointments at Freedom from Torture, prior agreement to fund travel should be obtained from Liverpool IBU. See 9.2 for contact details.

- 10.17. For travel to substantive asylum interviews in Croydon, prior agreement to fund travel should be obtained from Croydon IBU. See 9.3 for contact details.
- 10.18. For travel to appeal hearings at Christopher Wren House, prior agreement should be obtained from Travel. See 9.4 for contact details.

Claims for reimbursement for travel to section 4 accommodation

- 10.19. There may also be infrequent occasions where an applicant is granted section 4 support, has no alternative accommodation but is unable to immediately access the section 4 accommodation due to the time required to issue a travel ticket. In these instances the One-Stop Services can contact the PAC1 Team by fax on 020 8604 6907 who will be able to authorise a request to purchase form allowing the One-Stop Service to fund the travel and claim reimbursement.

Claims for reimbursement from other organisations

- 10.21. On occasions asylum seekers may have to borrow money from other organisations or people. In the case of legitimate legal advisers, such as solicitors, the UK Border Agency should reimburse them directly when they have lent cash to asylum seekers to enable them to attend their substantive asylum interview or asylum appeal hearing. However, if tickets were given, the UK Border Agency cannot reimburse the legal advisers directly and their claim for reimbursement should be refused.
- 10.22. In other cases, legal advisers should only be reimbursed directly when they have loaned either cash or travel tickets for asylum seekers and their dependants to attend bail applications. In other cases, such as visits to Freedom from Torture or attendance at asylum support hearings, the asylum seeker's reimbursement should be included in their support payment.
- 10.23. Legal Advisers will be required to produce evidence that they lent their client money to enable them to travel, that they informed their client they would be applying to the UK Border Agency to seek reimbursement and that the claim for travelling would normally be funded along with an invoice for the claim. If Travel Officers are unsure about the legitimacy of a legal adviser or a claim they should seek advice from the travel manager.

Claims for reimbursement from other groups or individuals

- 10.24. Claims for reimbursement from other groups or individuals, such as relatives and friends, should normally be refused. Travel Officers should write to them refusing payment.

11. Annex A, B & C

- Annex A provides 'at a glance' clarification of the circumstances in which travel costs may be provided to the UK Border Agency supported asylum seekers and notes the paragraphs where stated in the bulletin.
- Annex B provides further information about the travel costs that are funded directly by the voluntary organisations, through their grant funding arrangements.
- Annex C details the legislation which allows the UK Border Agency to pay the cost of travel.

The following table outlines the circumstances in which travel expenses may be provided to UK Border Agency supported asylum seekers.

	Asylum seekers who are in receipt of section 98 support, pending a section 95 decision	Asylum seekers who are receiving section 95 support	Asylum seekers who have been refused UK Border Agency support under sections 98 and 95
Lodging asylum application/level 1 screening	No	N/A	No
Level 2 screening	No	N/A	No
Further screening dates e.g. ARC	No	N/A	No
Travel to Initial Accommodation	No	N/A	No
Travel to Dispersal Accommodation	N/A	Yes – refer to 3	No
Asylum Support Interview	refer to 4	refer to 4	No
Freedom from Torture	Yes – refer to 8	Yes – not in all cases, refer to 8	No
Substantive Asylum Interview	Yes – refer to 5.1	Yes – refer to 5.1	No
Asylum Appeal Hearing	Yes – refer to 5.1	Yes – see 5.1	No
Asylum Support Appeal Hearing	Yes – refer to 5.1	Yes – refer to 5.1	Yes – refer to Annex C
Bail Hearing	Yes – refer to 5.1	Yes – refer to 5.1	No

TRAVEL PROVIDED BY THE VOLUNTARY AGENCIES

- A. This annex provides advice about travel costs that are funded directly by the voluntary organisations, on behalf of the UK Border Agency, through their grant funding arrangements.
- B. Voluntary Sector agencies are grant funded by the UK Border Agency to provide:
- initial travel from referral point to Reception Assistant;
 - travel from Reception Assistant to emergency accommodation;
 - if the Reception Assistant has been unable to complete the Asylum Support application form on first presenting, then a further return journey from emergency accommodation to the OSS/Reception Service;
 - onward travel from Reception Assistant to UK family/sponsor for applicants not requiring emergency accommodation, or those vacating emergency accommodation following a change of circumstances application;
 - any local travel from emergency accommodation to mainline stations for those being dispersed with self-write tickets;
 - travel costs for essential medical appointments while in emergency accommodation;
 - travel to relevant Immigration Service offices to collect immigration documents.
- C. Agencies may not meet the following travel costs from UK Border Agency grant funding:
- travel to solicitors or legal advisers – this cost may be recovered in some cases from the Legal Services Commission.
 - travel costs to screening interviews or to enable applicants to make their asylum applications.

The legislation which allows the UK Border Agency to pay for the cost of travel

The Immigration and Asylum Act 1999, section 96(1)(c) allows for the Secretary of State to provide support under section 95 and to meet the expenses of a supported asylum seeker (other than legal expenses or other expenses of a prescribed description) incurred in connection with his claim for asylum. This includes the reasonable travelling expenses of witnesses summoned to appear at an Asylum Appeal hearing by virtue of Rule 47 of the Immigration and Asylum Appeals (Procedure) Rules 2003. However, please note that this section does **not** apply to the dependants of the asylum seeker.

Section 96 (1)(d) and (e) allows for support to be provided to enable an asylum seeker and his dependants, to attend bail proceedings in connection with the asylum seeker's detention or their dependant's detention under any provision of the Immigration Acts (this excludes bail hearings relating to alleged criminal acts);

The UK Border Agency may also provide travel support to asylum seekers supported under section 98 to those required to attend a substantive asylum interview, asylum appeal hearing or appointment at Freedom from Torture.

Section 103(9) allows the Secretary of State to pay any reasonable travelling expenses incurred by an appellant in connection with attendance at any place for the purposes of an appeal concerning their support arrangements under Part VI of the Immigration and Asylum Act 1999 (section 95 support).

Section 96(2) enables the Secretary of State to provide support under section 95 in such other ways as he considers necessary if the circumstances of a particular case are exceptional.

Travel costs may also be provided under section 4 to those failed asylum seekers who meet the criteria to qualify for such support (see section 7 above).

Document Control

Change Record

Version	Authors	Date	Change Reference
3.0	BF	26/11/2008	Update branding only
4.0	SM	11/10/11	Medical Foundation name change to Freedom from Torture