**Journal of Law & Social Studies (JLSS)**
Volume 5, Issue 2, pp 296-306
www.advancelrf.org

# Human Rights Law and Internal Police Review Mechanism in Anti-terrorism Legislation: A Liberal Critique and Case Study of UK and Pakistan

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## Abstract

*Detainees are often vulnerable during pre-charge detention. They are even more vulnerable when charged with a terrorism offence. The nature of pre-charge detention, particularly in cases of terrorism, demands to put more restraints or safeguards during the period to help protect human rights of the persons suspected of terrorism. Internal police review mechanism is one of the safeguards to protect the vulnerability of terror detainees during the pre-charge detention. This review mechanism is inherently internal to police which provides immediate assistance and relief to a terrorism detainee. This paper critiques the anti-terrorism legislation in UK and Pakistan with a focus on internal police review mechanism. Socio-legal/non-doctrinal research methodology, such as – Liberal Critique – is deployed to examine and critique, on the topic, Terrorism Act 2000 and Anti-terrorism Act 1997 of the UK and Pakistan respectively. Relevant human rights are used as yardstick to determine how internal police review mechanism ought to be carried out. Pakistan is the main case study while UK is its comparator. This research finds the provision of internal police review mechanism in UK's model for the first 48 hours. The research also finds that there is a complete absence in the anti-terror laws of Pakistan on internal police review mechanism. The paper concludes that UK should provide internal police review mechanism throughout the entire period of pre-charge detention – 14 days. The paper also concludes by suggesting the incorporation of internal police review mechanism in the anti-terrorism law of Pakistan to help protect terrorism detainees during the period of pre-charge detention – 90 days. This way both jurisdictions will comport with, to an extent of, their human rights obligations when struggling against terrorism.*

**Keywords:** Internal Police Review Mechanism, Pre-charge Detention, Anti-terrorism Law, Human Rights Law, Liberal Critique, Policing, Discretion and Due Process Models

## Introduction

The purpose of this research paper is to critique the anti-terrorism laws of UK and Pakistan related to the Internal Police Review Mechanism (hereinafter, IPRM). IPRM reviews the actions of investigating and/or review officers carried over during the pre-charge detention period in cases of terrorism. Laws, including anti-terrorism laws, are generally being reviewed in different ways (Blackbourn, 2014). The widely known and generally applied reviewing method is through courts

when judiciary reviews the actions of the executive, particularly, police actions through a writ petition filed by any aggrieved party. Secondly, a parliamentary committee is also entrusted with mandate to review any draft bills to make sure if the draft-law complies with the largely accepted norms of human rights. There may also be a third reviewing mechanism – independent review. The law in question is referred to an expert who after a thorough and rigorous assessment provides their feedback if the law or its draft under consideration would suffice or comport with the human rights obligations. Next, independent commissions are put in place to hear complaints against the violations of any laws in force (Ibid). All these reviewing mechanisms are treated as external since these are external to police department.

IPRM is the most important review mechanism ensuring human rights soon after a person is deprived of their liberty (Walker, 2009). IPRM is inherently internal. This is a review mechanism inside the police department. The significance of IPRM cannot be overlooked in terrorism related cases, particularly when detainees are more vulnerable during the period of pre-charge detention since the detainee remains in the custody of police. Police generally expect more information and/or confession during this period which renders the terror detainees more vulnerable (Ibid). IPRM is an important safeguard ensuring detainees are fairly treated throughout their period of detention. IPRM is carried out by a review officer providing every minute details of the terror detainees for administrative and judicial scrutiny to comply with the most important human rights law and principles (Ibid).

This work is going to deploy a socio-legal/non-doctrinal research methodology called – Liberal Critique. This research methodology uses relevant human rights law and principles to critique anti-terrorism laws on IPRM in UK and Pakistan. Case Study research method is going to be used to know almost everything about IPRM in the two jurisdictions – UK and Pakistan. Pakistan will act as the principal or main case while the UK acts as a comparator to learn lessons from. Primary data includes Terrorism Act 2000, UK, the Anti-terrorism Act 1997, Pakistan, the Universal Declaration of Human Rights (hereinafter, UDHR), International Covenant on Civil and Political Rights (hereinafter, ICCPR), and Convention against Torture (hereinafter, UNCAT). Secondary data includes scholarly work on the topic from impact authors.

The paper critically reviews important work of the prominent authors on IPRM to indicate and establish academic niche. This is then followed by a close examination of the important human rights law and principles on the topic. These will then be used as yardstick to critique with rigour the laws on the topic in the two jurisdictions. Next, the Terrorism Act 2000 of the UK, and Anti-terrorism Act 1997 of Pakistan are to be examined to find out how IPRM is carried out in the two countries. A critical analysis is carried over to arrive at definite research findings followed by specific recommendations in the concluding part of the paper to suggest how ought IPRM to be carried out in accordance with the relevant human rights law and principles.

## Literature Review

The precursors of IPRM are well-grounded in various approaches to security. Almost all securicratic approaches prefer the discretion model of policing to exercise unlimited powers to curb exclusively any terror threats. Unlike, there are certain liberal approaches advocating for the due process model of policing to exercise limited powers which are also restrained by various safeguards put in place not only to counter any terror threats but also to ensure the protection of human rights of the detainees.

The most prominent amongst all securicratic approaches to policing are the work of Oren Gross, Richard Posner, Mark Tushnet, Amitai Etzioni, and Bruce Ackerman. Oren Gross (2003) suggests a policing model to take extra-legal measures when there is an imminent threat of terrorism. His focus

is on the early intervention to prevent any terror incidents. He further suggests that a government officer dealing with security is not answerable to courts or judicial review because their action is in the best interest of the state and for the protection of public at large. All such officers are the judges of their own actions. Their actions shall get ex post ratification through the top executives in the country though. The Grosse's early intervention is in fact pre-charge terrorism detention. During this period the discretion of the officer shall prevail. There shall be no restrictions or checks on the powers of police officers. In other words, IPRM does not have any place in the Grosse's model.

Richard Posner (2006) concurs with Gross by presenting his 'pragmatism' model of policing to thwart any terror incidents. His pragmatic model suggests taking extra-legal actions to quell the threat of terrorism. He believes that the US Constitution is not a suicide pact – meaning thereby it is a loose garment providing clear indications for its loose interpretations to adapt it to our strategies including models of policing to deal with terrorism. He proposes lengthy detention duration of pre-charge detention. He even supports incommunicado detention. Posner is of the opinion that the actions of police officer are not subject to any review including judicial review for an obvious reason that judges have little knowledge of dealing with security threats. IPRM is opposed by Posner.

Mark Tushnet (2010) proposes somewhat similar mechanism for dealing with terrorism threats through the organ of executive. He propounds emergency powers of the executive which lie outside the constitution. He advocates unlimited powers for police with no checks on them to help eradicate terrorism from any state. His logic is based on what he calls a 'pattern'. He thinks that each terrorism cycle begins and ends in a same pattern. The executive is more active while judiciary and people are sluggish or indifferent to react to. The judiciary later provides ex post ratifications to all the executive actions taken to curb terrorism. So, he suggests what if we have emergency powers for police which should not be checked or reviewed through the constitutional guarantees provided in constitutions. Just as Gross and Posner, Tushnet too is in favour of unlimited powers for police to deal with terror threats. He does not support IPRM.

Bruce Ackerman (2004) provides for a special constitution to deal with cases of terrorism. He calls it 'Emergency Constitution'. He believes that there must be an alternate route to deal with terrorism because normal constitutions are not meant for dealing with any terrorism threat which is why this emergency constitution is important. By providing this second-layered-constitution – the emergency constitution – we reassure people about their safety in grave emergencies. Ackerman's model of the emergency constitution provides more powers to police to deal with terrorism threat. The emergency constitution will be triggered automatically when there is a parallel situation or attack to that of the '9/11'.

Etzioni Etzioni (2008) puts forward his conception of security as 'Security First'. He believes that in terms of ordering different factors ancillary to the development of any nation, security must rank at the top. His prioritizing security over civil liberty and other important rights suggests that security is impact factor, it is the most important determinate for development, therefore, this must be ensured. Now, security is the subject of executive, particularly the law enforcement agencies in which police is at its heart. In short, Etzioni advocates illimitable and inexhaustible powers for police to deal with the threat of terrorism.

All of the above securicrats categorically support more powers for police. They are fine with even if these powers are extra-legal or extra-constitutional. Their main concern is to defeat terrorism. It is only possible to have strong security apparatus, usually strong police with limitless powers to prevent terrorism. They give more importance to executive over legislature and judiciary. They advocate to concentrate powers in the hands of police to deal or counter terrorism. They are clearly in the camps of the executive paradigm of terrorism – different from the war and crime paradigms.

The war paradigm involves army to quell the threat while the crime paradigm entrusts courts to prosecute terrorists. The executive paradigm of terrorism is neither prosecution nor war but to quell terrorism through the unlimited powers of police working on the prevention rather than on prosecution of terrorism. In short, IPRM can hardly find any space in the work of these securicrats.

Let's turn to the crime paradigm of terrorism and critically examine the viewpoints of some liberals and their police models to deal with terrorism. Amongst liberals the most contemporary and important ones are – David Luban, Lucia Zedner, David Cole, Sunstien, Fernando Teson, Weinberg, and Clive Walker.

David Luban (2005) critiques the work of the above securicrats by providing some eight fallacies in their work. He criticizes that security can never take over civil liberties. If security is power, civil liberty is more power. There can hardly be any concept of 'absolute security'. Human rights not only are applicable during peace time but also in grave emergencies. Rather these rights are more vulnerable during these emergencies which require greater protections and safeguards. All law enforcement agencies are to be restrained with reasonable safeguards to ensure that human rights of all are respected, particularly, in grave emergencies. IPRM is one of the most important safeguards.

Lucia Zender (2003) complains of 'too much security' in the modern world, particularly after the '9/11' attacks. She contemplates that all rights have been securitized. The security industry has entered everyday life. We are being watched and spied upon in every nook and corner. She further critiques the securicrats argument of the imminent danger of terrorism which is falsely based on the ticking bomb scenario. These fake scenarios which has never happened in the real life should never influence the drafting of anti-terrorism laws. Such securitization can't done away with IPRM which is one of the most important checks on the powers of police during the pre-charge terrorism detention.

David Cole (2004) criticizes the emergency constitution of Bruce Ackerman. David renders it to be utopian – there is no such thing. He fears that that the emergency constitution of Bruck Ackerman has the tendency to become permanent. Sunset clauses are generally doing the same thing and after introducing these infiltrates and remains permanent in the criminal law. Emergencies are temporary. Such situations do not need any permanent emergency constitution to tackle security threats. The powers of the executive need to be checked and reviewed thoroughly to prevent them to become part of the problem, David Cole suggests. He concludes with his famous saying, "the priority of morality" over all executive actions and constitutions. It is not security but morality which prevails. So, it is apt to say to put more restrictions on the powers of police including IPRM.

Sunstien (2005) also criticizes the approaches to police models of the securicrats. He believes that vulnerable groups are always at-risk during emergencies. The minorities suffer at the hands of the majority. He terms it to be the worst balancing form when civil liberties are sacrificed for ensuring more security. He proposes crime paradigm of terrorism where security of the people are ensured through prosecutions wherein stressed is made on case to case basis. Sunstein recommends putting in place restraints on the powers of police.

Fernando Teson (2005) conceptualizes a new dimension of security – Liberal Security. This security is based on ensuring human rights of all during all times. This is to ensure security of all by adhering to the most important liberty and freedom human rights. Executive, particularly, police are disempowered from exercising their extra-legal powers. Their powers are restrained, and important limitations are imposed on these. All their actions are subject to scrutiny and review.

Weinberg (2008) comes up with a police model more attuned to democratic values to help curtail terrorism. He suggests that democratic values are more powerful. These must be intertwined with

police models to deliver. The usage of brutal and arbitrary force at the hands of police are counterproductive. Law enforcement agencies must be made more accountable by putting more restraints on their powers to be adjudged against when dealing with matters of terrorism.

Clive Walker (2009) presents all-encompassing model of criminal justice system in his 'constitutionalism'. His constitutionalism possesses three important pillars – rights audit, accountability, and constitutional governance. The rights audit make three different categories of rights – absolute, conditional, and provisional. He suggests that absolute rights, such as, right against torture can never be curtailed. Conditional and provisional rights may be curtailed but with reasonable restrictions upon which should also be necessary and proportionate to the peril of terrorism. The second pillar is that of accountability. All law enforcement agencies are accountable, their actions are to be rigorously reviewed. The last pillar refers to the constitutional governance where courts must review actions of the executive.

All the above liberal models of policing are in favour of the accountability of law enforcement agencies, putting reasonable restrictions on the powers of police when dispensing their duties to tackle terrorism. They all propound and support reviewing all actions of the law enforcement agencies when dealing with cases of terrorism. The best way to review the powers of police during pre-charge detention is IPRM.

Many have written on policing and terrorism in Pakistan, however, very few have touched upon the review mechanisms of police in the country. Fasihuddin (2012) has talked at length about the problems faced by Pakistani police when dealing with investigation of terrorism cases. He didn't mention IPRM though. Suddle (2003) has very well provided a historical background of the evolution of police system in the world and Pakistan. He has provided useful recommendations to transform police from a force to service and thus to make them more human rights friendly. His work is quite useful; however, he has missed the internal review in policing in the country which directly reassure human rights. Hussain (2012) has also carried out research on police and terrorism in Pakistan, however, his focus is on religious sectarianism as the main cause of terrorism in the country for which he has proposed his police model to root out religious violence. He has missed the point to introduce internal reviewing mechanism of the police actions in cases of terrorism. Likewise, Kennedy (2004) and Ras (2010) have carried out qualitative research on the anti-terrorism legislation of Pakistan and concludes that such laws are constantly being used against political opponents in the country.

It seems as if there is a complete absence of research on the IPRM in Pakistan. The UK model has not been used as comparator to learn lessons from particularly in the IPRM. This research will contribute to the criminal justice system, particularly in the law enforcement of Pakistan, by introducing IPRM to help improve the human rights of terrorism suspects. This novel feature of the law enforcement mechanism – IPRM – will help realize the expectations of all the liberals mentioned above. This will certainly help improve the human rights of terrorism detainees in Pakistan and even beyond.

## Human Rights Law & Police Review Mechanic

Universal Declaration of Human Rights (hereinafter, UDHR) is the mother of all human rights. The Declaration clearly provides Right to Life, Right to Liberty and Security of Person to all human beings in Article 3. Article 5 bans torture, cruel, inhuman, degrading treatment, and punishments. Arbitrary arrest and detention are prohibited in Article 9. Fair Trial is protected in Article 10. Article 11 is related to the presumption of innocence – a person is innocent until proven guilty.

International Covenant on Civil and Political Rights (hereinafter, ICCPR) reaffirms Right to Life, Right to Liberty and Security of Person. Article 7 protects all against torture, cruel, ill, inhuman, and degrading treatment just as the UDHR has enshrined. Article 9 firmly prohibits arbitrary detention. The Article clearly provides important guarantees during pre-charge detention. These guarantees are – informing the reason of their arrest, informing the charges against them, promptly producing the detainees before the court of law, starting their proceedings without delay and within reasonable time. The detainees must be given an opportunity to challenge their unlawful arrest and detention. They shall have an enforceable right of compensation should their detention is found to be unlawful. Article 10 enshrines the humane treatment of all detainees waiting for their trial to begin. Article 14 enshrines Right to a Fair Trial including the presumption of innocence, speedy and inexpensive justice, non-discrimination, access to the outside world etc.

Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment (hereinafter, UNCAT) reiterates, reaffirms, guarantees almost all of the above human rights in UDHR and ICCPR. UNCAT's focus is on the total prohibition of Right against Torture, and other ill-treatments during custody. The Convention is direct provision related to review mechanism of the law enforcement agencies in Article 11. It is mandatory for all member-states to review systematically rules, practices, and methods that are used during police custody.

Human Rights Law is very much clear on the review mechanisms of the executive actions. Article 11 has made is very clear and provides direct guarantees for ensuring internal police review mechanisms which should be systematic. All member-states are duty bound to comply with these important human rights protections including the IPRM to be put in place and reflected in policing of all the member-states.

**Examination of Police Review Mechanisms in UK and Pakistan**

The purpose of this section is to closely examine the anti-terrorism legislation of the UK and Pakistan on the Internal Police Review Mechanism. After the close and thorough examinations, the law on the topic will be assessed considering the relevant human rights law examined before. The examination in this part will begin with the UK's model – serving as a comparator – followed by the Pakistani model – being the main or principal case study.

In the UK's police model there are, in fact, three different sub-departments/sections dealing with a detainee suspected of terrorism. These departments are – Investigation, Custody, and Review. The Terrorism Act 2000 of the UK provides therein Schedule 8 expressly dealing with investigation, custody, and police review mechanism in terrorism cases. The responsibility of the investigative officer is to investigate the matter and hold on to the record. This investigation includes all records of interrogation and questioning to get the relevant information or confession of the detainees. The Act also provides for the custody officer to be responsible for the safe custody of the detainees and their safe detention conditions. Now, the actual focus of this paper is the review mechanism inside the police. In the UK there is a separate office of the review officer to review the work of the investigative and custody officers if these have been carried out in accordance with the human rights standards. Such reviews are systematically and periodically carried out by the reviewing officer. It is the mandate of the review officer to provide active and immediate assistance to terror detainees from the arbitrary treatment of the investigative and custody officers. Therefore, it is demanding and apt for the review officer to differ on methods and practices deployed against the terror suspects.

This is how the IPRM is triggered in the UK. The review officer carries out their first or initial review soon after the suspected person is arrested. No express time is mentioned though. The principle of promptness is applicable to carry out the review as quickly as possible. Subsequent

review is carried out systematically within each 12 hours intervals. Each act or question asked by the review officer is document for judicial and administrative scrutiny, accountability, or audit.

The IPRM in the UK is applicable within the first 48 hours of detention. The total period of terrorism detention in the UK is 14 days though. However, this review is only applicable in the first two days of the detention. The subsequent reviews are deferred by the review officer in three situations, namely – if the investigating officer satisfies the review officer that intervention of reviewing the actions of the former and to initiate the review proceedings will prejudice or harm the outcome of the investigation; due to the absence of the review officer; or when the review may be deferred due to any other reason.

The duration of detention in terrorism cases are not automatically renewed. It is important to satisfy a review officer to sanction the prolongation of such detention in police custody. There are certain requirements to fulfill in the Terrorism Act 2000 and Schedule 8 there under. It is mandatory to prove to obtain or preserve some relevant evidence with the prolongation of the detention. Secondly, when it is essential to wait for the results of the examination carried out with expectations to get more relevant proof/evidence. Thirdly, that the detainee is going to be deported and that the case is pending with Secretary of State of the UK. Lastly, the continued detention may also be authorized by the review officer waiting for the outcome of the decision whether to charge or release the detainee.

There are other important functions of the review officers. They make sure the detainee is reminded of their right to challenge the legality of their detention. They also make sure to remind that the detainees are aware of their right to contact a lawyer of their choice including to contact the outside world too.

Turning to the principal case study – internal police review mechanism in Pakistani anti-terrorism legislation. The Anti-terrorism Act 1997 provides for the total detention duration which is 90 days. The Act further states that the detention of a terror suspect shall not exceed 30 days at one time. The detainees remain in police custody for the first 24 hours or 48 hours when the court is satisfied. When the terrorism suspects are arrested, they are handled by the investigation and custody officers. There is no reviewing officer in Pakistan to review internally the treatment of a terror detainees conducted by the investigation and custody officer. There is a sort of external review mechanism – oversight of judiciary – when the court is satisfied that no bodily harm or injury will be inflicted custody of the terror detainee is given to police to get further information or confession.

The 1973 Constitution of Pakistan provides for the formation of a review board only cases of preventive or indefinite detention as is carried out in the war or executive paradigm of terrorism. This provision is not triggered for judicial detention or detention for prosecution as is carried out in the crime paradigm of terrorism.

As was highlighted in the literature review that there is complete absence in the already published work on internal police review mechanism in Pakistan and so is the case with the lack of express provisions on the topic in the anti-terrorism legislation of the country.

**Critical Analysis of the Internal Police Review Mechanisms UK and Pakistan**

This part is going to critique the anti-terrorism laws on internal police review mechanism considering the human rights law and its standards set for the treatment of terror detainees for all member-states including the UK and Pakistan. Liberal Critique research methodology is going to be deployed for critiquing police models in the two jurisdictions on the topic.

The UK's model on the topic expressly provides for IPRM in its anti-terrorism legislation. The reviewing officer acts as a quasi-judicial person to check the excess or arbitrary powers of the investigating officers and/or custody officers. All activities are properly documented for the courts to review when dealing with to determine the legality of the detention under consideration.

The review officer is entrusted with powers to intervene soon after the arrest is made. The initial review is promptly carried out and then followed by subsequent reviews which should not exceed than 12 hours of interval. This review mechanism is available only for the first 48 hours while a detainee suspected of terrorism remains for 14 days detention in total in the UK.

Article 11 of the UNCAT and the Human Rights Committee decision in A v. Australia clearly states that review mechanisms of the police actions must be regular and systematic. The review mechanism shall cover for the entire period of terrorism detention for an obvious reason that terror detainees are more vulnerable during police custody.

The UK's model is quite innovative on IPRM, however, this does not provide for the whole review of the detention period. Even for the first 48 hours reviews, the protection afforded to can be easily postponed and the detainee would be left to the sole discretion of the investigating and custody officer. Overall, there is this reflection of the due process policing model in the UK for the first 48 hours detention of terror suspect. Cliver Walker's constitutionalism and other liberal attitudes of the liberals mentioned above are at least reflected in the first 48 hours detention.

Critiquing the Pakistani model on IPRM which is a main case study of this research shows a complete absence. There is nothing in the laws to show that the powers of investigating and/or custody officers are being checked internally. This sort of situation leaves a suspected terrorism under police custody to the discretion of investigating and custody officers. Here Pakistan follows the discretion models of policing which gives more powers to police as was previously supported by all the securicrats – Oren Gross, Richard Posner, Mark Tushnet, Amitai Etzioni, and Bruce Ackerman. This sounds like following the war or executive paradigm of terrorism. The judicial or crime paradigm of terrorism is not preferred in the country.

As previously stated, there is a total of 90 days pre-charge detention in Pakistan. In which a detainee may remain for 30 days at a time in police custody. Not only this, but the country is also in practice for providing preventive detention. So, when a terror suspect is detained for 90 days in preventive and then another 90 days booked for under the judicial or prosecution detention amounts to a total of 180 days or six months. The detainees are more vulnerable during these six months through out, especially in the absence of reviewing officer who is there to keep an eye on the maltreatment of terror detainees at the hands of the investigating and/or custody officers.

This paper reaches to its concrete research findings in the two jurisdictions – UK and Pakistan – on the topic. In the context of the UK, the country's police model reflects liberal attitudes to embrace the due process model by providing the IPRM in the first 48 hours at least. Second, the subsequent reviews may be postponed due to unknown reasons giving more discretion to defer or delay the review, thus leaving a detainee at the mercy of the investigating and/or custody officers.

In the context of Pakistan, the worrying thing is the complete absence of IPRM in the police model of the country. Now, this sort of arrangement tilts too much in favour of the discretion model where the custody and investigating officers have upper hands. Their work is not checked internally. One may counter argue of the presence of external mechanisms. The external review mechanisms are no more helpful in the internal and day to day handling of the terror detainees. Torture or maltreatment of terror detainees should be stopped internally by the police, and it is only possible to have a sound IPRM as guaranteed in the human rights law.

## Conclusion

The above critique clearly depicts that both jurisdictions need improving their anti-terrorism legislation, particularly on IPRM. In the context of the UK, the country needs to think seriously and provide complete internal review mechanism throughout the 14 days of terrorism detention. The country is also indeed of making it obligatory to trigger the subsequent review mechanisms automatically which can never be postponed. If a review officer is not available someone may be deputed instead to carry out with the duties. Also, the courts must give due consideration and importance to all the accounts presented by the review officer in the case under consideration. If all this is accomplished the country may truly be termed as a due process police model embodying the teachings of all liberals, such as - David Luban, Lucia Zedner, David Cole, Sunstien, Fernando Teson, Weinberg, and Clive Walker.

In the context of Pakistan, the country's complete absence of the IPRM is quite disappointing. It has been more than two decades the country is enforcing and applying anti-terror laws to counter terrorism; however, little attention has been paid to the protection of human rights of the terror detainees. The human rights law and the Human Rights Committee both demand for the erection of a sound IPRM within country's police system/model. The complete absence clearly depicts the discretion model of policing reflecting the attitudes of the securicrats, such as - Oren Gross, Richard Posner, Mark Tushnet, Amitai Etzioni, and Bruce Ackerman.

There is an urgent need to have an entire reviewing department in the police system of Pakistan, just as they have provided for investigative and custody departments. Review officers should be recruited and trained properly to carry out effective review or evaluation of the handling of terror detainees by the investigative and custody officers. Such officers must also be properly trained to document each activity or shift carried out related to each terror detainee and preserve the record for the courts or administrative scrutiny. IPRM should be provided throughout the period of terror detention in the country. The introduction and compliance to IPRM in Pakistani police will certainly make the institution more human-rights-friendly thus comporting with the country's human rights obligations even during grave emergencies.

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