

SO14

FURTHER SUBMISSIONS

This further submission is intended to supplement the Response to Potential Criticisms ('RPC') submitted on behalf of SO14 in the TSoI's Appendix to the Generic Submissions [SUB001992-2003]. The Tribunal is referred to those submissions.

It is denied that SO14's interpretation of the order prohibiting hooding by 1 (UK) Division was inappropriate conduct. As indicated in the RPC, para. 7(c) [SUB002001], SO14 accepted that he could have clarified the remit of the order. However, the reason for continuing to deprive prisoners of sight while in transit was clear in that there were serious security concerns. It is notable that the order banned hooding as a means of sight deprivation, but did not prohibit sight deprivation *per se*; due to the lack of alternative means of depriving sight, and the pressing security considerations, SO14 reasonably believed it was necessary to use hoods. However, he only continued to use them until replacement goggles were available (see para. 7(d) RPC [SUB002001]).

It is also notable that SO14 believed that SO40, his OC, was made aware of the continuance of hooding (7(d), RPC [SUB002001]).

On the basis of the above, and of the submissions made on behalf of SO14 in the RPC, it would be unreasonable to criticise SO14 in this regard.