



Factsheet

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Immigration detention

Introduction

- Immigration detention is a primary focus of the work of the CPT. It has carried out hundreds of visits to immigration detention facilities, and has developed a detailed set of standards.
- The CPT's standards build on legal principles originating from international (human rights) instruments, such as the European Convention on Human Rights (ECHR),¹ the Committee of Ministers' Twenty Guidelines on Forced Return,² relevant United Nations (UN) treaties, and the 2008 European Union (EU) Return Directive.³
- A foreign national may be deprived of his/her liberty following a(n) (alleged) violation of the legislation related to aliens, such as illegal entry, illegal residence, etc. Frequently, such detention is referred to as 'immigration detention', which is a form of administrative detention in most Council of Europe member states.
- Under the terms of Article 5 of the ECHR, this form of deprivation of liberty is permitted, provided that action is being taken either with a view to deportation, or in order to prevent unauthorised entry into the country. Deprivation of liberty of irregular migrants shall be neither arbitrary nor the automatic consequence of an (alleged) violation of aliens legislation. In other words, immigration detention should be exceptional, proportionate and, by consequence, an individual measure necessary in order to prevent unlawful immigration.
- In line with its administrative nature, immigration detention must not be punitive in character: it is not a sanction or a punishment. Therefore, immigration detainees should be afforded both a regime and material conditions appropriate to their legal situation.
- "Asylum seekers" are not "immigration detainees", although the persons concerned may become so should their asylum application be rejected and their leave to stay in a country rescinded.

¹ In particular Articles 3, 5 and 8.

² CM(2005)40 final, 9 May 2005; in particular Guidelines 10 and 11.

³ Directive 2008/115/EC of the European Parliament and of the Council of 16 December 2008 on common standards and procedures in Member States for returning illegally staying third-country nationals.

The Directive applies to all European Union Member States except the United Kingdom and Ireland. To the extent that it applies to those who enter the territory without authorisation, it applies to Denmark and the Schengen associates (Iceland, Liechtenstein, Norway and Switzerland).

1. Detention as a last resort

- Deprivation of liberty under aliens legislation should only be a measure of last resort, after a careful and individual examination of each case. In addition, the continued need for it should be the subject of periodic review. Alternative (non-custodial) measures should be developed and used wherever possible.⁴
- Whenever asylum seekers are deprived of their liberty, as an exceptional measure, pending the outcome of their application, they should be afforded a wide range of safeguards in line with their status, going beyond those applicable to irregular migrants and should be kept separately from foreign nationals who have not lodged an application for international protection.⁵
- If members of the same family are detained under aliens legislation, every effort should be made to avoid splitting up the family.⁶
- The CPT is of the view that the prolonged detention of persons under aliens legislation, without a time limit and with unclear prospects for release, could easily be considered as amounting to inhuman treatment.⁷

2. Safeguards during detention

- Every instance of deprivation of liberty should be covered by a proper individual detention order, readily available in the establishment where the person concerned is being held; and the detention order should be drawn up at the outset of the deprivation of liberty or as soon as possible thereafter. This basic requirement applies equally to irregular migrants who are deprived of their liberty. Further, the fundamental safeguards of persons detained by law enforcement agencies are reinforced if a single and comprehensive custody record is kept for every such person, recording all aspects of his/her custody and all action taken in connection with it.⁸
- Detained irregular migrants should, from the very outset of their deprivation of liberty, enjoy three basic rights, in the same way as other categories of detained persons. These rights are: (1) to have access to a lawyer, (2) to have access to a medical doctor, and (3) to be able to inform a relative or third party of one's choice about the detention measure.⁹
- The right of access to a lawyer should include the right to talk with a lawyer in private, as well as to have access to legal advice for issues related to residence, detention and deportation. This implies that when irregular migrants are not in a position to appoint and pay for a lawyer themselves, they should benefit from access to legal aid.¹⁰
- All newly arrived detainees should be promptly examined by a doctor or by a fully-qualified nurse reporting to a doctor.¹¹
- Notifying a relative or third party of one's choice about the detention measure is greatly facilitated if irregular migrants are allowed to keep their mobile phones during deprivation of liberty or at least have access to them.¹²

⁴ [Malta: 2004 visit, paragraph 14; Serbia and Montenegro: 2004 visit, paragraph 65.](#)

⁵ [19th General Report on the CPT's activities, paragraph 76; Spain: 2014 visit, paragraph 9.](#)

⁶ [Germany: 2005 visit, paragraph 56; 19th General Report on the CPT's activities, paragraph 87.](#)

⁷ [Bulgaria: 2008 visit, paragraph 29.](#)

⁸ [19th General Report on the CPT's activities, paragraph 85.](#)

⁹ [19th General Report on the CPT's activities, paragraph 81.](#)

¹⁰ [19th General Report on the CPT's activities, paragraph 82.](#)

¹¹ [19th General Report on the CPT's activities, paragraph 82.](#)

¹² [19th General Report on the CPT's activities, paragraph 82.](#)

- In addition to these three basic safeguards, international law recognises the right of a detained irregular migrant to ask for consular assistance. However, as not all irregular migrants may wish to contact their national authorities, the exercise of this right must be left to the person concerned.¹³
- Detained irregular migrants should be expressly informed, without delay and in a language they understand, of their rights and the procedure applicable to them. To this end, all immigration detainees should be systematically provided with a document setting out this information; the document should be available in the languages most commonly spoken by those concerned and, if necessary, the services of an interpreter should be made available. The persons concerned should confirm in writing that they have been informed of their rights, in a language they can understand.¹⁴
- Foreign nationals should receive, when necessary, the assistance of qualified interpreters. The use of fellow detainees as interpreters should, in principle, be avoided.¹⁵
- Detained irregular migrants should have every opportunity to remain in meaningful contact with the outside world, and should have regular access to a telephone or to their mobile phones.¹⁶
- Arrangements should be made to enable detained irregular migrants to consult a lawyer or a doctor on an ongoing basis, to receive visits from NGO representatives, family members or other persons of their choice, and to have telephone contact with them.¹⁷
- It is in the interests of both immigration detainees and staff that there be clear house rules for all detention facilities, and copies of the rules should be made available in a suitable range of languages.¹⁸
- Detained irregular migrants should benefit from an effective legal remedy enabling them to have the lawfulness of their deprivation of liberty decided speedily by a judicial body. This judicial review should entail an oral hearing with legal assistance, provided free of charge for persons without sufficient means, and interpretation (if required). Moreover, detained irregular migrants should be expressly informed of this legal remedy. The need for continued detention should be reviewed periodically by an independent authority.¹⁹

3. Suitable premises

- A prison is by definition not a suitable place in which to detain someone who is neither suspected nor convicted of a criminal offence.²⁰
- Immigration detainees are frequently initially held at “point of entry holding facilities”, airport transit zones and police stations. Clearly, these places are often inadequate places in which to accommodate persons, in particular for extended stays. Consequently, the period of time spent by immigration detainees in such establishments should be kept to the absolute minimum²¹ (i.e. less than 24 hours).

¹³ [19th General Report on the CPT's activities, paragraph 83.](#)

¹⁴ [Netherlands \(Antilles\): 2007 visit, paragraph 36; Romania: 2006 visit, paragraph 61.](#)

¹⁵ [Bulgaria: Visit 2010, paragraph 53.](#)

¹⁶ [Hungary: Visit 2015, paragraph 70; 19th General Report on the CPT's activities, paragraph 79; Serbia and Montenegro: 2004 visit, paragraph 78.](#)

¹⁷ [19th General Report on the CPT's activities, paragraph 87.](#)

¹⁸ [19th General Report on the CPT's activities, paragraph 88.](#)

¹⁹ [19th General Report on the CPT's activities, paragraph 86.](#)

²⁰ [Ireland: 2014 visit, paragraph 19.](#)

²¹ [7th General Report on the CPT's activities, paragraph 27.](#)

- Persons detained under aliens legislation should be accommodated in centres specifically designed for that purpose, offering material conditions and a regime appropriate to their legal situation. Care should be taken in the design and layout of such premises to avoid, as far as possible, any impression of a carceral environment.²²
- Female detainees should be held in an area which is separated from that accommodating male detainees, and their privacy should be guaranteed.²³

4. Adequate material conditions for longer stays (over 24 hours)²⁴

- Immigration detention centres should provide accommodation which is adequately furnished, clean and in a good state of repair, and which offers sufficient living space for the numbers involved.²⁵
- These centres should have adequate lighting (including daylight), ventilation and heating.²⁶
- Call bells should be installed in all detention areas where staff are not continuously present.²⁷
- All detained persons should:
 - be provided with a bed or plinth, and a clean mattress and clean blankets;²⁸
 - have ready access to toilet facilities, including at night;²⁹
 - be provided, on a regular basis, with a basic sanitary kit (including adequate rations of soap, washing powder, toilet paper, shampoo, shaving utensils and toothpaste, and a toothbrush) free of charge;³⁰
 - have access to a shower and to hot water;³¹
 - be offered the possibility to wear their own clothes during their stay if those are suitable and, if necessary, to have them washed and repaired;³²
 - be provided with the necessary products and equipment to keep their accommodation clean;³³
 - be provided with lockable space in which to keep personal belongings;³⁴
 - have access to food and drinking water.³⁵ Meals should take into account the religious requirements and dietary habits of foreign nationals.³⁶

²² [Malta: 2008 visit, paragraph 51.](#)

²³ [Greece: 2011 visit, paragraph 38.](#)

²⁴ [Greece: 2013 visit, paragraph 51.](#)

²⁵ ["The former Yugoslav Republic of Macedonia": 2014 visit, paragraph 113.](#)

²⁶ [Ukraine: 2002 visit, paragraph 62.](#)

²⁷ [Greece: 2011 visit, paragraph 38.](#)

²⁸ [Greece: 2007 visit, paragraph 25.](#)

²⁹ [Greece: 2011 visit, paragraph 38.](#)

³⁰ [Greece: 2011 visit, paragraph 38.](#)

³¹ [Greece: 2013 visit, paragraph 51.](#)

³² [Croatia: 2007 visit, paragraph 37.](#)

³³ ["The former Yugoslav Republic of Macedonia": 2014 visit, paragraph 120.](#)

³⁴ [Croatia: 2007 visit, paragraph 35.](#)

³⁵ [Hungary: 2005 visit, paragraph 53.](#)

³⁶ ["The former Yugoslav Republic of Macedonia": 2014 visit, paragraph 120.](#)

5. Open regime

- Conditions of detention for irregular migrants should reflect the nature of their deprivation of liberty, with limited restrictions in place and a varied regime of activities. Within the detention facility, detained persons should be restricted in their freedom of movement as little as possible.³⁷
- Detained irregular migrants should in principle have free access to outdoor exercise throughout the day (i.e. considerably more than one hour per day) and outdoor exercise areas should be appropriately equipped (benches, shelters, etc.).³⁸
- The longer the period for which persons are held, the more developed should be the activities which are offered to them.³⁹ Purposeful activities, in an immigration detention context, can include, *inter alia*, language classes, IT/computer classes, gardening, arts and crafts, cookery skills and so-called “cultural kitchens”.⁴⁰
- Immigration detention centres should include access to a day room and to radio/television and newspapers/magazines, as well as other appropriate means of recreation (e.g. board games, table tennis, sports),⁴¹ a library and a prayer room.⁴² All multiple occupancy rooms should be equipped with tables and chairs commensurate with the number of persons detained.⁴³
- The presumption should be in favour of open visits for detained foreign nationals. Visiting rooms should enable immigration detainees to meet under open conditions with family and friends visiting them, and the environment should be child-friendly (including a play area for children). If, exceptionally, it is considered necessary to impose restrictions on a particular foreign national, this should be done on the basis of an individual risk assessment.⁴⁴
- Immigration detainees should be offered the possibility to have visits several times per week. As a minimum, they should be allowed to receive at least one visit of one hour per week.⁴⁵
- Immigration detainees should have access to computers along with Voice over Internet Protocol or Skype facilities and basic internet access.⁴⁶

³⁷ [19th General Report on the CPT's activities, paragraph 79.](#)

³⁸ [Hungary: 2015 visit, paragraph 42; France : 2010 visit, paragraph 43; Ukraine: 2009 visit, paragraph 62.](#)

³⁹ [Cyprus: 2013 visit, paragraph 45.](#)

⁴⁰ [Denmark: 2014 visit, paragraph 78; United Kingdom: 2012 visit, paragraph 120.](#)

⁴¹ [“The former Yugoslav Republic of Macedonia”: 2014 visit, paragraph 113.](#)

⁴² [“The former Yugoslav Republic of Macedonia”: 2014 visit, paragraph 120.](#)

⁴³ [Greece: 2013 visit, paragraph 72.](#)

⁴⁴ [Czech Republic: 2014 visit, paragraph 41; The Netherlands: 2011 visit, paragraph 72; Hungary: 2009 visit, paragraph 44; Austria: 2014 visit, paragraph 49.](#)

⁴⁵ [Germany: 2010 visit, paragraph 44.](#)

⁴⁶ [Denmark: 2014 visit, paragraph 82; “The former Yugoslav Republic of Macedonia”: 2014 visit, paragraph 133.](#)

6. Qualified staff

- Custodial staff in detention centres for immigration detainees should be carefully selected and receive appropriate training.⁴⁷
- Staff should possess well-developed qualities in the fields of interpersonal communication and cultural sensitivity, given the diverse backgrounds of the detainees. Further, at least some of them should have relevant language skills.⁴⁸
- They should also be taught to recognise possible symptoms of stress reaction displayed by detained persons and to take appropriate action.⁴⁹
- The presence of both male and female staff can have a beneficial effect in terms of the custodial ethos and foster a degree of normality in a place of detention.⁵⁰ The presence of female custodial staff members should be guaranteed in all establishments accommodating female detainees.⁵¹
- The ethos of an immigration detention setting should not be carceral, which means that staff working within immigration detention facilities should not be equipped with batons, handcuffs or pepper spray.⁵²

7. Discipline, segregation and means of restraint

- As regards discipline, clear procedures should be formally established and applied in practice; any grey areas involve the risk of an unofficial (and uncontrolled) system developing.⁵³ In this context, the CPT recommends that:
 - formal disciplinary regulations be drafted for holding centres for foreign nationals detained under aliens legislation. These regulations should provide detainees with a right to be heard on the subject of the offences which they are alleged to have committed, and to appeal to a higher authority against any sanctions imposed;
 - a clear disciplinary procedure be adopted, affording detained persons the rights to be informed in writing of the charges against them, and to call witnesses on their own behalf.⁵⁴
- If segregation is imposed (e.g. for security reasons), the foreign nationals concerned should be provided with a copy of the relevant decision and information on the possibilities to appeal the measure to an outside authority, segregation should be time-limited and a separate register should be established (setting out full information, such as date and time of entering and leaving, grounds for segregation, etc.).⁵⁵

⁴⁷ [Luxembourg: 2015 visit, paragraph 111](#); [Czech Republic: 2014 visit, paragraph 37](#).

⁴⁸ [Luxembourg: 2015 visit, paragraph 111](#); [Czech Republic: 2014 visit, paragraph 37](#).

⁴⁹ [Luxembourg: 2015 visit, paragraph 111](#); [Czech Republic: 2014 visit, paragraph 37](#).

⁵⁰ [Greece: 2013 visit, paragraph 79](#).

⁵¹ [Malta: 2004 visit, paragraph 61](#).

⁵² [Norway: 2011 visit, paragraph 38](#); [Latvia: 2011 visit, paragraph 36](#).

⁵³ [Malta: 2004 visit, paragraph 64](#).

⁵⁴ [19th General Report on the CPT's activities, paragraph 88](#); [Ukraine: 2009 visit, paragraph 71](#); [Bulgaria: 2008 visit, paragraph 44](#); [France: 2006 visit, paragraph 76](#).

⁵⁵ [19th General Report on the CPT's activities, paragraph 88](#); [Ukraine: 2009 visit, paragraph 71](#); [Bulgaria: 2008 visit, paragraph 44](#); [France: 2006 visit, paragraph 76](#).

- Detainees in segregation should have a means of rest at their disposal, ready access to toilet facilities, and regular access to a shower, as well as at least one hour of outdoor exercise every day and access to reading matter.⁵⁶
- Applying handcuffs as a matter of routine to immigration detainees whenever they leave their detention facility, such as on hospital transfers, is disproportionate; the use of means of restraint should be considered on individual grounds and based on the principle of proportionality.⁵⁷

8. Monitoring and complaints mechanisms

- Independent monitoring of detention facilities for irregular migrants is an important element in the prevention of ill-treatment and, more generally, of ensuring satisfactory conditions of detention. To be fully effective, monitoring visits should be both frequent and unannounced. Further, monitoring bodies should be empowered to interview irregular migrants in private and should examine all issues related to their treatment (material conditions of detention, custody records and other documentation, the exercise of detained persons' rights, health care, etc.).⁵⁸
- Effective complaints procedures are basic safeguards against ill-treatment in immigration detention. As regards complaints procedures, immigration detainees should have avenues open to them, both internally and externally, and be entitled to confidential access to an appropriate complaints authority.⁵⁹

9. Adequate health care

- Medical screening of all newly-arrived detainees is in the interests of both detainees and staff, in particular for identifying those at risk of self-harm, screening for transmissible diseases and the timely recording of any injuries.⁶⁰
- All newly-arrived detainees should benefit from comprehensive medical screening (including screening for transmissible diseases) by a doctor or a fully-qualified nurse reporting to a doctor as soon as possible after their admission.⁶¹
- The record drawn up after a medical examination of a detainee, whether newly-arrived or not, should contain:
 - (i) a full account of objective medical findings based on a thorough examination;
 - (ii) an account of statements made by the person concerned which are relevant to the medical examination, including any allegations of ill-treatment made by him/her;
 - (iii) the doctor's observations in the light of (i) and (ii), indicating the consistency between any allegations made and the objective medical findings.

In addition, the results of every examination, including the above-mentioned statements and the doctor's observations, should be made available to the detainee and his/her lawyer.⁶²

⁵⁶ [Ukraine: 2009 visit, paragraph 71](#); [Bulgaria: 2008 visit, paragraph 44](#).

⁵⁷ [Netherlands: 2011 visit, paragraph 56](#); [Malta: 2004 visit, paragraph 67](#).

⁵⁸ [19th General Report on the CPT's activities, paragraph 89](#).

⁵⁹ [United Kingdom: 2012 visit, paragraph 136](#); [Spain: 2011 visit, paragraph 97](#).

⁶⁰ [Sweden: 2015 visit, paragraph 37](#).

⁶¹ [Sweden: 2015 visit, paragraph 37](#).

⁶² [Austria: 2014 visit, paragraph 46](#).

- Whenever injuries are recorded which are consistent with allegations of ill-treatment made by a detained person (or which, even in the absence of the allegations, are indicative of ill-treatment), the information should be immediately and systematically brought to the attention of the relevant prosecutor, regardless of the wishes of the person concerned.⁶³
- Medical confidentiality should be observed in the same way as in the outside community; in particular, irregular migrants' medical files should not be accessible to non-medical staff but, on the contrary, should be kept under lock and key by the nurse or doctor. Moreover, all medical examinations should be conducted out of the hearing and – unless the doctor concerned requests otherwise in a particular case – out of the sight of custodial staff.⁶⁴
- At a minimum, a person with a recognised nursing qualification must be present on a daily basis at all centres for detained irregular migrants. Such a person should, in particular, perform the initial medical screening of new arrivals (in particular for transmissible diseases, including tuberculosis), receive requests to see a doctor, ensure the provision and distribution of prescribed medicines, keep the medical documentation and supervise the general conditions of hygiene.⁶⁵
- Whenever members of the medical and/or nursing staff are unable to make a proper diagnostic evaluation due to language problems, they should be able to benefit without delay from the services of a qualified interpreter.⁶⁶
- Detained irregular migrants should be fully informed about the treatment being offered to them.⁶⁷
- Adequate access to psychological assistance and psychiatric care should be provided to detainees.⁶⁸ Further, procedures and training should be in place to prevent acts of self-harm and suicides.⁶⁹

10. Care of vulnerable persons (in particular children)

- Specific screening procedures aimed at identifying victims of torture and other persons in situation of vulnerability should be put in place and appropriate care should be provided. In this context, the CPT considers that there should be meaningful alternatives to detention for certain vulnerable categories of person. These categories include *inter alia* victims of torture, victims of trafficking, pregnant women and nursing mothers, children, families with young children, elderly persons and persons with disabilities.⁷⁰
- The CPT wishes to recall its position that every effort should be made to avoid resorting to the deprivation of liberty of an irregular migrant who is a child.⁷¹

⁶³ [Austria: 2014 visit, paragraph 46.](#)

⁶⁴ [19th General Report on the CPT's activities, paragraph 92.](#)

⁶⁵ [19th General Report on the CPT's activities, paragraph 91.](#)

⁶⁶ [19th General Report on the CPT's activities, paragraph 92.](#)

⁶⁷ [19th General Report on the CPT's activities, paragraph 92.](#)

⁶⁸ [Finland: 2014 visit, paragraph 36.](#)

⁶⁹ [Greece: 2015 visit, paragraph 117.](#)

⁷⁰ [Hungary: 2015 visit, paragraph 51; Denmark: 2014 visit, paragraphs 77-79; Cyprus: 2013 visit, paragraph 33; United Kingdom: 2012 visit \(September\), paragraphs 132 and 133; 19th General Report of the CPT's activities, paragraphs 75 and 76; Malta: 2008 visit, paragraph 68.](#)

⁷¹ [19th General Report on the CPT's activities, paragraph 97.](#)

- When, exceptionally, children are held with their parents in a detention centre, the deprivation of liberty should be for the shortest possible period of time. Mother (or any other primary carer) and child should be accommodated together in a facility catering for their specific needs.⁷²
- The CPT concurs with the United Nations Committee on the Rights of the Child which considers that “[i]n application of article 37 of the Convention [on the Rights of the Child] and the principle of the best interest of the child, unaccompanied or separated children should not, as a general rule, be detained. Detention cannot be justified solely on the basis of the child being unaccompanied or separated, or on their migratory or residence status, or lack thereof”.⁷³ Further, other Council of Europe bodies, such as the Parliamentary Assembly⁷⁴ and the Commissioner for Human Rights,⁷⁵ have stated that unaccompanied children should not be detained.⁷⁶
- As soon as possible after the presence of an unaccompanied minor becomes known to the authorities, a professional qualified person should conduct an initial interview, in a language the child understands. An assessment should be made of the child’s particular vulnerabilities, including from the standpoints of age, health, psychosocial factors and other protection needs (including those deriving from violence, trafficking or trauma).⁷⁷ Every effort should be made to facilitate their immediate release from a detention facility and their placement in more appropriate care.⁷⁸
- Any unaccompanied or separated child deprived of their liberty should be provided with prompt and free access to legal and other appropriate assistance, including the assignment of a guardian or legal representative⁷⁹ who keeps them informed of their legal situation and effectively protects their interests. Review mechanisms should also be introduced to monitor the ongoing quality of the guardianship.⁸⁰
- Children should only be held in centres designed to cater for their specific needs and staffed with properly trained men and women.⁸¹
- In order to limit the risk of exploitation, special arrangements should be made for living quarters that are suitable for children, for example, by separating them from adults, unless it is considered in the child’s best interests not to do so. This would, for instance, be the case when children are in the company of their parents or other close relatives. In that case, every effort should be made to avoid splitting up the family.⁸²
- Children deprived of their liberty should be offered a range of constructive activities (with particular emphasis on enabling a child to continue his/her education).⁸³

⁷² [Cyprus: 2013 visit, paragraph 36](#); [Czech Republic: 2014 visit, paragraph 32](#).

⁷³ Committee on the Rights of the Child, General Comment no. 6 (2005) on the Treatment of unaccompanied and separated children outside their country of origin, CRC/GC/2005/6, 1 September 2005, paragraph 61

⁷⁴ Parliamentary Assembly of the Council of Europe, Resolution 1707 (2010) on detention of asylum seekers and irregular migrants in Europe, 28 January 2010, paragraph 9.1.9, and Resolution 2020 (2014) on the alternatives to immigration detention of children, 3 October 2014, paragraph 3

⁷⁵ Commissioner for Human Rights, Positions on the rights of minor migrants in an irregular situation, CommDH/PositionPaper(2010)6, 25 June 2010.

⁷⁶ [Finland: 2014 visit, paragraph 29](#).

⁷⁷ [19th General Report on the CPT’s activities, paragraph 98](#).

⁷⁸ [Denmark: 2014 visit, paragraph 77](#).

⁷⁹ [“The former Yugoslav Republic of Macedonia”: 2014 visit, paragraph 122](#).

⁸⁰ [19th General Report on the CPT’s activities, paragraph 98](#).

⁸¹ [Greece: 2015 visit, paragraph 108](#).

⁸² [19th General Report on the CPT’s activities, paragraph 100](#).

⁸³ [19th General Report on the CPT’s activities, paragraph 99](#).