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European NPM Conference:

The Role of NPMs in the Effective Implementation of European Court of Human Rights Judgments and CPT Recommendations

Tackling Police Ill-treatment and Ensuring Effective Investigations into Alleged Ill-treatment

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CONFERENCE REPORT

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Summary

The Council of Europe (CoE) organised a conference¹ for European National Preventive Mechanisms (NPMs), other detention oversight bodies and stakeholders from the torture prevention field. Due to the on-going restrictions in the context of the pandemic, the conference took place in an online format, which had the advantage that a high number of participants could take part. Participants, many of whom were also among the list of distinguished speakers, included members and prison oversight staff from European Union (EU) NPMs (the CoE extended the invitation to NPMs in the CoE region and beyond), present and former members of the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT), experts in detention monitoring, as well as civil society representatives and CoE staff. Participants welcomed the broad format, geographic scope and list of speakers of the conference, which allowed them to benefit from these insights and discussions.

The conference was organised jointly by the European NPM Forum – a joint European Union-CoE project, co-funded by both organisations and implemented by the CoE – and the CoE Department for the Execution of Judgments of the European Court of Human Rights (the Court). The conference explored means of strengthening NPMs' participation in the execution of judgments process (which is possible through submissions under Rule 9 of the Committee of Ministers that supervises the execution), with a specific focus on Court judgments related to violations of Article 3 of the European Convention on Human Rights (the Convention), to

¹ See [NPMs' role in the implementation of ECHR judgments and CPT recommendations on police ill-treatment and ineffective investigations - News \(coe.int\)](https://www.coe.int/en/news/2021/09/20210920-npm-implementation).

achieve systemic changes. The thematic focus of the conference highlighted the importance of combating police ill-treatment by enhancing the effectiveness of investigations into such treatment and addressing impunity in a more systematic manner. Day 1 encompassed outlining the execution of judgments process and the key role NPMs play therein, as well as detailing the general problem of ill-treatment by law enforcement officials in CoE member States. Here, the central theme was to identify challenges in relation to NPMs' monitoring of law enforcement and to discuss root causes of police ill-treatment. Day 2 then focused on using NPMs' daily monitoring work and the tool of Rule 9 submissions as a strategic means to combat and prevent police torture and other forms of ill-treatment and enhance effective investigations into alleged ill-treatment. Hence, the focus turned from identifying challenges to discussing strategies aiming to combat police ill-treatment, and to identify good practices implemented by individual NPMs and oversight bodies, which might be useful for others. Day 3 presented a change in focus, as it offered the possibility to discuss NPM-related issues and provided updates on several initiatives relevant to the OPCAT mandate.

The conference offered insights and expert views on the topical issue of police ill-treatment, which remains a systemic problem in many CoE member States. Indeed, the CPT emphasised that it heard credible torture allegations in almost one third, and allegations concerning ill-treatment in over half, of the CoE's member States. Combating torture and ill-treatment by law enforcement officials hence remains a key concern for the future work of NPMs and other monitoring bodies. One area where NPMs' preventive efforts can have a systemic impact alongside CoE efforts to reduce torture and ill-treatment is the execution of judgments process of Court judgments concerning Article 3 violations. In this context, civil society organisations and National Human Rights Institutions (NHRIs), including NPMs, have the possibility to issue Rule 9 submissions. To date, NPMs rarely make use of this opportunity, which hampers the effective implementation of Court judgments and stifles systemic progress towards eradication of torture and ill-treatment. Whilst holistic changes in law, policy and practice are needed to combat police ill-treatment and to prevent torture effectively, NPMs play a key role in preventing such ill-treatment and combating impunity.

Day 1

Session 1: Opening session on the execution of judgments process

The first session started with presentations on the potential role of NPMs in the execution of judgments process, the challenge of non-implementation or inadequate implementation of judgments and good practice examples of NPMs having participated in this process. CoE member States have undertaken to comply with final Court judgments and decisions finding violations of the Convention. Effective implementation of Court judgments requires States to take both individual and general measures to prohibit torture and ill-treatment and to protect individuals against such treatment as well as *ex officio* to re-open, resume or continue investigations in an effective and Convention-compliant manner. The execution of judgments process includes several steps.

First, cases are classified for supervision under the standard or the enhanced procedure. The enhanced procedure applies to those judgments that require urgent individual measures or that raise major structural or complex problems, pilot judgments and inter-State cases. The State then issues an action plan, which presents the measures planned to implement a judgment. Upon implementation of said measures, the State then submits an action report that presents measures taken for implementation and a justification why no further measures are needed. The role of the Committee of Ministers is to supervise the entire procedure.

For human rights to be guaranteed in detention and for torture to be prevented, compliance with the Convention and effective implementation of Court judgments are crucial. In this regard, NPMs play a central role. They are the “watchdogs” that can monitor closest the daily occurrence of ill-treatment in places of deprivation of liberty and speak to perpetrators and victims. In the context of the execution of judgments process, the Committee of Ministers relies on accurate information, detailing the implementation of measures in practice and the situation on the ground. To this end, NPMs can make use of Rule 9 submissions, for instance by including information gathered during their monitoring visits, to inform relevant decisions taken by the Committee of Ministers. Indeed, the process relies on a bottom-up approach and emphasis lies on interaction with third parties to ensure adequate implementation of judgments.

Participants then learned about the problem of non-implementation or inadequate implementation of Court judgments and what role NPMs and NHRIs play in this process. Indeed, judgments are rarely implemented on their own; yet, they have a great potential for the work of NPMs and their mandate. Judgments provide an opportunity for human rights change and they can lead to tangible improvements once implemented and enforced. Moreover, effective implementation can set the agenda for more widespread and systemic reform and trigger long-lasting improvements to human rights in the State concerned. NPMs can use their mandate to prevent premature case closure, for instance when governments fail to see or address the systemic nature of a problem and focus on solving an isolated case. There is also a significant number of cases that are pending and NPMs are encouraged to exert pressure on governments to begin implementing these cases: In 2020, a total of 5,233 cases remained pending, of which 1,258 cases are classified as leading. 15% of all leading cases in the enhanced supervision procedure concerned ill-treatment by state agents and/or failure to investigate such allegations.

That NPM intervention can lead to direct improvements is shown by an example of the Georgian Public Defender’s Office. The *Tsintsabadze v. Georgia* group of cases concerned systemic problems in relation to the investigation of crimes committed by law enforcement officers. The Georgian Public Defender’s Office combined Rule 9 submissions and domestic advocacy, which targeted systemic problems in investigating allegations of ill-treatment in police custody. Georgia then established a State Inspector’s Service for heading investigations and ensured that doctors employed in detention facilities are now obligated to report cases where they suspect ill-treatment.

Although it was agreed that Rule 9 submissions bear many advantages for NPMs and their preventive work, and although a large part of leading cases concerns issues of relevance to their mandate, NPMs currently use this opportunity only sparingly. For example, in 2020, the Committee of Ministers received 162 non-governmental organisation (NGO) submissions but just 14 NHRI submissions. There is thus room for improvement and for increased engagement of both NHRIs and NPMs.

Despite the fact that Rule 9 submissions may be new territory for most NPMs, it was emphasised that this does not add disproportionately to NPMs' already considerable workload compared to their added value. Instead, NPMs can use their daily monitoring and reporting strategically to feed into such submissions. NPMs were encouraged to combine their on-going thematic work with implementation advocacy concerning the judgments. It is also worthwhile to form alliances with other stakeholders or to use existing networks, for instance with civil society, to collaborate on submissions and information exchange. Finally, NPMs can use their dialogue with government authorities to discuss implementation strategies. This bears the advantage that NPMs become even more connected in the torture prevention field and, jointly with governments, the CoE and civil society, work towards achieving human rights implementation on a systemic level.

Session 2: Training session on Rule 9 submissions

Session 2 focused on practical training for NPMs to issue effective Rule 9 submissions as part of the execution of judgments process. Speakers stressed that supervision is a continuous process and so, communications may be submitted at any point in time. Nevertheless, certain key moments specifically invite Rule 9 submissions as they become particularly relevant then. These moments include the classification of new judgments, the period before the case is examined during one of the quarterly Human Rights meetings of the Committee of Ministers and the submission of the action report by the State, as the State considers that the case is ready to be closed. Rule 9 submissions concerning case classification can help NPMs make an argument to classify a case under the enhanced procedure, should they consider for instance the underlying problems at hand to be systemic in nature. Whereas NPMs can submit a communication up to five working days before the meeting during which a case is examined by the Committee of Ministers, a submission should ideally be made five to seven weeks prior to the meeting to allow for it to be examined fully and to have the most impact. NPMs are encouraged to refer to the indicative list of cases that are scheduled for each meeting, which can be found online.

In the context of submissions, NPMs can address both individual and general measures required to implement a judgment. Individual measures have the aim to end on-going violations and to erase their consequences. The provision of remedies and individual redress to victims is one example. Such individual measures are often implemented before the adoption of general measures, which aim to prevent future violations. Whilst NPMs may also wish to comment on the adequacy of individual measures for past and on-going violations, they are encouraged to assess whether States adequately tackle root causes, whether measures are appropriate and sufficient or, where necessary, what additional measures may be considered, based on their monitoring and reporting.

Finally, NPMs can use their submissions to acknowledge positive developments to put the focus on those areas that remain problematic and warrant additional attention. By highlighting the required measures and following-up on the need for States to implement them at the level of the Committee of Ministers, NPMs also get a picture of their own impact in the proceedings, and the extent to which they helped facilitate structural human rights improvements in their State.

Session 3: Substantive session on police ill-treatment and effective investigations into alleged ill-treatment (Part 1)

This session included presentations on the structural problems of police ill-treatment and ineffective investigations into such ill-treatment as well as leading judgments where the Court found substantive and/or procedural violations of Article 3 of the Convention in this respect. The first part highlighted the CPT's findings regarding police ill-treatment based on country visits. The CPT distinguishes between three types of abuse. Excessive use of force at the time of apprehension, which may amount to inhuman or degrading treatment and which includes, *inter alia*, kicks or blows after a person has been brought under control or excessively tight handcuffing; ill-treatment during transportation to police stations and in police custody; as well as ill-treatment and torture during questioning with the aim to obtain information or a confession. Whilst torture and ill-treatment have been successfully reduced or eradicated in a number of CoE member States, other States continue to face challenging levels of police abuse warranting high attention.

Experts and participants agreed that police ill-treatment can only be eradicated through a holistic approach that includes changes in law and policy, as well as in practice and police culture. Multiple areas need to be addressed: Police forces need to respect safeguards during the first hours of deprivation of liberty (namely the right of access to a lawyer, the right of access to a doctor and the right to have the fact of one's detention notified to a relative or another third party of one's choice) and inform people in detention about these safeguards, especially as the first hours have been identified to bear the highest risk of torture and ill-treatment. Additionally, there is a need for changing interview practices (here, the newly established Mendez Principles promoting investigative interviewing are of particular importance), strengthening independent monitoring and promoting a change in police culture more generally, so that police officers no longer view ill-treating suspects as an acceptable behaviour.

NPMs play an important role in implementing these changes. Aside from monitoring the treatment of persons held in police custody and the implementation of safeguards specific to law enforcement, NPMs can assess whether the legal framework enables torture and ill-treatment or whether it may create loopholes for perpetrators. NPMs can also analyse the extent to which police officers are trained in human rights standards and interview techniques and examine whether the necessary conditions are in place to effectively prevent torture and ill-treatment. Due to their monitoring mandate and their regular contact with police and State authorities, they are particularly well positioned to oversee the implementation of legal, practical, and cultural changes and to highlight where reforms are insufficient.

A holistic approach tackling the root causes of police ill-treatment in turn will contribute to prevent future abuse and ill-treatment, thereby ensuring that NPMs continue to effectively fulfil their Optional Protocol to the United Nations Convention against Torture (OPCAT) mandate in practice.

Despite the focus being on police ill-treatment, participants agreed that such holistic measures need to go beyond law enforcement and include all actors and professional groups involved in the criminal justice system. Judges and prosecutors need to show interest in preventing torture and ill-treatment as well as holding perpetrators to account, which includes taking seriously and investigating any allegations of ill-treatment that may be brought to their attention. Healthcare professionals such as doctors working in detention facilities need to remain vigilant and accurately report any suspicions of torture and ill-treatment that they may find when treating people in detention.

In addition, each State needs to create an independent body to carry out investigations into allegations or indications of ill-treatment. The Court established that such investigations must meet certain requirements, including independence and impartiality, promptness and expeditiousness, as well as thoroughness and effectiveness. Whilst NPMs usually do not have the mandate to carry out such investigations themselves, they can monitor whether such investigations are effectively carried out in practice and the extent to which they allow for accountability.

Finally, it was noted that NPM oversight also matters for other human rights institutions, such as the CoE Commissioner for Human Rights who relies on regular monitoring of the conditions on the ground being carried out by NPMs and other NHRIs. The Commissioner frequently refers to the work of NPMs to draft her reports and recommendations. Examples where NPMs have been important to the Commissioner's mandate are violent pushbacks at borders, where police officers forcibly return migrants, and the policing of demonstrations, where law enforcement officials regularly use violent and illicit crowd control measures.

Day 2

Session 3: Substantive session on police ill-treatment and effective investigations into alleged ill-treatment (Part 2)

Day 2 focused entirely on tackling the problem of police ill-treatment. Presentations addressed ways in which NPMs can support the implementation of Court judgments on both substantive violations related to police ill-treatment as well as procedural violations concerning the ineffective investigation into such ill-treatment. Participants also discussed the need for independent oversight of law enforcement authorities with a focus on the role of NPMs in such oversight and how they can effectively contribute to ending impunity for police ill-treatment. The discussions emphasised that preventing torture and ill-treatment and ending impunity are closely related, and participants agreed that, although prevention and prosecution are often seen as opposing, they are two sides of the same coin that should be considered and addressed together for torture to be ended effectively.

1) Tackling the structural problem of police ill-treatment

Police ill-treatment and torture remain structural and systemic problems in a number of CoE member States, which is not just demonstrated through the above-mentioned multitude of CPT findings, but also through the fact that police ill-treatment represents the highest category of cases pending execution before the Committee of Ministers. Due to this, a holistic approach is necessary, including different steps that need to be taken to effectively prevent torture and end impunity: NPMs might wish to put a specific focus on fundamental safeguards, the admissibility of evidence and the prohibition of using evidence obtained under torture, as well as on proper sanctions for torture-related crimes, appropriate remedies to victims and medical assistance (including forensic expertise) where necessary.

The aspect of fundamental safeguards during the first hours after arrest has increasingly received attention recently and, more generally, participants welcomed the specific focus on police ill-treatment, due to the high risk of torture and ill-treatment for newly arrested suspects and where police officers may feel pressured to obtain a confession. Reasons for ill-treatment are diverse and include the lack of training (such as inadequate training on interviewing techniques), appropriate equipment (such as audio- and video-recordings in interview rooms) and resources (resulting in the failure to provide training and equipment), the notion that it is the right thing to punish the individual and the reliance on confession-based evidence. In this regard, participants agreed that eradication of torture can only be achieved when the afore-mentioned holistic approaches also focus on changing the police culture and attitude towards suspects during investigations. Successful change can for instance be achieved through the provision of training in investigative interviewing techniques and ethics training for law enforcement officials.

To contribute to the development of ethical conduct in law enforcement, NPMs can engage proactively with police forces and promote political reforms. An example of positive change is the group of cases *Virabyan v. Armenia* that concerned the applicants' death or torture during arrest or while being detained in police custody and the lack of an effective investigation into these events. Subsequently, the Armenian authorities created a special investigative service with a department to investigate torture allegations. In addition to providing additional support to victims, Armenia changed the Code of Criminal Procedure, which now criminalises torture in line with international law. Moreover, audio- and video-surveillance was introduced in police stations and torture is now excluded from the statute of limitations. Finally, Armenia envisages to establish an anonymous referral mechanism for complaints of ill-treatment. This case provides an example for the measures NPMs can promote to tackle the root causes of police ill-treatment and prevent torture.

Naturally, effective investigations into allegations of ill-treatment are a crucial part and it is for this reason that participants subsequently focused on the potential of NPMs being involved in such investigations.

2) Tackling the structural problem of ineffective investigations into alleged police ill-treatment

NPMs are monitoring bodies with a preventive mandate that generally excludes investigations into allegations of ill-treatment. Nevertheless, focusing on such investigations has a great potential to decrease the risk of police ill-treatment and matter to their OPCAT mandate for two reasons. First, NPMs may wish to monitor such investigations to ensure that they are effective and that the requirements as stipulated by the Court are met. Second, NPMs or Ombudsman Institutions may receive the mandate to undertake such investigations themselves. One such example is the Greek Ombudsman, which may serve as an inspiration for other NPMs and their role in monitoring police conduct. In addition to its NPM functions, the Greek Ombudsman, since 2016, also has the mandate of National Mechanism for the Investigation of Arbitrary Incidents. The police must refer all disciplinary proceedings concerning arbitrary cases, and the Mechanism receives full access to the police investigation. To meet the Court requirements of effectiveness, disciplinary investigations into arbitrary incidents must notably be conducted in a timely manner and be carried out independently from the police directorate under investigation.

Participants also heard about the measures needed to enable justice. First, authorities in charge of investigations must be independent. This requires not only that investigators do not have any relationship with those under investigation, but also that those supervising investigations and prosecutors are themselves independent. In addition, investigatory mechanisms must have sufficient resources, powers, and competences to fulfil their mandate independently. Second, mechanisms need to be able to open investigations into ill-treatment *ex officio*. Whilst attention to complaints and allegations of torture and ill-treatment are important, all parties involved in the criminal justice system, such as judges and prison staff, must remain vigilant and report any suspected cases of ill-treatment. Third, a methodology must ensure that investigations into ill-treatment are carried out thoroughly. Not only does this include collecting testimonies from all involved individuals and ensuring access to all relevant documents and footage of video-surveillance, but investigatory bodies must understand how police forces and places of deprivation of liberty operate. Fourth and finally, decisions taken by prosecutors on torture and ill-treatment cases need to be transparent, especially when they decide to close a case, to guarantee that there is not a lack of will to prosecute such cases and that victims have access to adequate remedies. Participants agreed that both independent and effective oversight and the victims' participation are central to successful torture prevention.

Participants also discussed the problems arising from cases of alleged torture and ill-treatment that are subsequently dismissed in court or fail to be prosecuted adequately, for instance because police officers cannot be identified during operations, which hampers the identification of perpetrators. To this end, independent police oversight and the push towards reforms remain essential parts of the work of any NPM and its mandate.

3) Independent oversight of police and investigations, including oversight role of independent bodies and independent complaints mechanisms

The presentation of the work and mandate of two specialised bodies served as an illustration of how independent police oversight functions in practice. The Irish Ombudsman Commission as an independent complaints body has the mandate to investigate criminal allegations against police officers, and the police must refer all cases involving death or serious harm. Another example is the Norwegian Bureau for Investigation of Police Affairs as an independent investigation unit, which investigates serious allegations of misconduct against police officers or prosecutors. Similar to the Irish Ombudsman Commission, the Norwegian Bureau for Investigation of Police Affairs also has the mandate to investigate cases involving death or serious harm during police contact.

Participants agreed that such bodies are crucial for democratic societies to function and for the public to trust public authorities. For such bodies to be credible, they need to be independent, adequately resourced and need to work actively and in a transparent manner with both police forces and the public to establish trust. Although these requirements are clear, they may be challenging to be implemented in practice. For instance, it tends to be the rule rather than the exception that oversight bodies receive only a small fraction of the funding of the very institutions they oversee. Often, budgets are limited and workloads considerable. There was agreement that further measures may be necessary at national level to establish independent police complaints and oversight bodies, which dispose of an adequate level of funding.

4) Combating impunity for police ill-treatment

The final part of Day 2 focused on the NPMs' role in ending impunity for police ill-treatment and different ways in which NPMs can contribute to ensuring accountability for torture and ill-treatment were identified. First and foremost, NPMs need to be integrated in the wider human rights landscape, both at regional and international level. United Nations (UN) and CoE standards form an essential part of their work, and the implementation of Court judgments is crucial to ensure human rights on the ground. NPMs can contribute to ending impunity mainly through their daily work, and notably their monitoring visits and reporting. By paying close attention to the treatment of suspects in police stations and better detection of ill-treatment, including through retrospective interviewing, as well as by examining the extent to which investigations into allegations of ill-treatment are effective, NPMs can have a real impact in preventing torture. Moreover, NPMs can push towards legal reforms that ensure for instance the implementation of safeguards during the first hours of deprivation of liberty, as well as ending the reliance on confessions for convictions. Participants agreed that through these steps, NPMs can bridge the apparent gap between prevention and prosecution to combat impunity and move towards holistic means of eradicating torture.

Although these steps are clear, participants agreed that the political landscape in which NPMs operate continues to change, a development to which NPMs must pay attention. Indeed, whereas societal pressure to end police violence has been high in recent years, notably due to multiple high-profile cases, States continue to reduce monitoring capacities because of budgetary concerns. Other issues, such as discrimination, remain concerning and, regularly, the political will appears to be lacking to implement long-lasting systemic change. Although NPMs may need to handle certain issues carefully to prevent being perceived as political, the need remains for NPMs to stay extremely vigilant and push towards full implementation of human rights. One way to exert the pressure needed to push states towards accountability and reform is using the term ‘torture’ where appropriate, instead of shying away by utilising other, less politicised, terms instead, which can have a real impact as it may exert the pressure needed to push States toward accountability and reform. Hence, together with other stakeholders, such as civil society organisations, NPMs can work towards ending impunity and preventing torture.

Day 3

Session 4: Closing session on NPM-related issues

The last day of the conference addressed NPM-related issues and comprised presentations on three projects of relevance to NPMs. Participants were provided with updates on the European NPM Forum, the creation of an international training centre for visits to places of deprivation of liberty and the “Prison Life Index” project. Participants welcomed that the European NPM Forum project is planned to be continued within the next project cycle (January to December 2022). NPMs backed plans for greater support in the setting up of new NPMs and for existing individual NPMs, including by means of a possible study visit by one EU NPM to one of its peers. It is also envisaged to continue issuing the European NPM Newsletter quarterly, although in a different format as of 2022. In addition, online follow-up workshops are planned.

The Association for the Creation of an International Training Centre for Visits to Places of Deprivation of Liberty presented their report on the consultation process with European NPMs and international stakeholders concerning the initiative of creating such a training centre² and summarised the views that were expressed by NPMs. The Training Centre is envisaged to offer a diversity of training options depending on the needs of individual NPMs. Participants welcomed that the Association attaches great importance to the views of NPMs. Indeed, in addition to a second consultation phase with all other NPMs globally, it is proposed to set up a working group consisting of members of the Association and representatives of interested NPMs and international stakeholders who would like to be involved in the planning of the next steps. NPMs are therefore invited to propose potential members and consult the report on the Association’s website.

² See: <https://www.itc-tortureprevention.org/>.

Finally, participants learned about the “Prison Life Index” project³ initiated by the NGO Prison Insider which has the goal to provide a tool to rate the compliance of national prison policies, from rulemaking to implementation, with international standards. The index will provide comparative country-by-country information on the living conditions of prisoners and prison systems worldwide. Information focuses on the extent to which prison systems comply with human rights standards in the categories “safety”, “food, accommodation and health care”, “being connected”, and “being active”. Whilst the aim is not to rank countries, the index gives the human experience a central place in the methodology and the researchers aim to understand what life is like for people in prisons across the world. Participants welcomed the project and highlighted the added value of the index for all parties involved in detention oversight.

Conclusions

This conference has demonstrated the need for further efforts by European NPMs to tackle the problem of police ill-treatment, assess the effectiveness of investigations in alleged police ill-treatment and address impunity in a more systematic manner. Torture and other forms of ill-treatment by law enforcement officials remain systemic problems in a great number of countries, and many CoE member States continue to implement Court judgments, and hence their human rights obligations, inadequately. New challenges, such as the pandemic, and the continuously evolving political landscape exacerbate existing problems. The fact that holistic approaches with a focus on a broad variety of factors are needed to combat torture and ill-treatment, including through culture change, makes this endeavour even more challenging.

Yet, this conference has also demonstrated the development of the rights situation across Europe and the many areas of improvement. Over the last decade, NPMs were created in the majority of European States, and monitoring detention conditions became the norm, not the exception. Whilst earlier meetings focused on basic aspects, such as the methodology of visits, these days NPMs look at more systematic ways of engagement, such as the execution of Court judgments and the implementation of CPT recommendations. The execution of judgments process, although currently underused, provides an important means to advocate for the effective implementation of Court judgments which can bring about a systemic impact in strengthening the rights of persons deprived of their liberty and contribute to achieving structural changes, by reforming laws, policies, and practices. This development demonstrates the maturity of prison oversight and monitoring mechanisms and the skill with which NPMs pursue torture prevention every day. Although society continues to change and new challenges arise, NPMs demonstrate flexibility and are able adapt to each development anew. In many cases, holistic approaches for torture prevention are already in place, and accountability slowly becomes the reality. The CoE, the CPT and the European NPM Forum look forward to continuing the cooperation with NPMs to make human rights a reality for all people deprived of their liberty.

³ See: <https://www.prison-insider.com/en/comparer/prison-life-index>.