

Thematic factsheet ¹
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MEDIA COVERAGE OF PROTESTS AND DEMONSTRATIONS



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Introduction

Protests and demonstrations and the way in which the authorities handled them are matters of legitimate public interest. The media has a crucial role in providing information on the authorities' handling of public demonstrations and the containment of disorder. According to the relevant case-law of the European Court of Human Rights, the "watch-dog" role of the media representatives is of particular importance in such contexts, since their presence is a guarantee that the authorities can be held to account for their conduct vis-à-vis the demonstrators and the public at large when it comes to the policing of large gatherings, including the methods used to control or disperse protesters or to preserve public order. Any attempt to remove journalists from the scene of demonstrations must therefore be subject to strict scrutiny.

The protection afforded by the Convention to journalists is subject to the proviso that they act in good faith in order to provide accurate and reliable information in accordance with the tenets of responsible journalism. The European Court of Human Rights, through its case law on the matter, assesses other provisions in addition to Article 10 (freedom of expression), such as Article 3 (prohibition of torture), Article 5 § 1 (lawfulness of detention) and Article 11 (freedom of assembly and association).

In assessing interferences with a right protected under the Convention, the Court carries out a three-fold test,

¹ This document presents a non-exhaustive selection of relevant provisions of the European Convention on Human Rights, related case-law of the European Court of Human Rights (source: [HUDOC](#) database), and other relevant Council of Europe instruments. Its aim is to improve the awareness of the acts or omissions of the national authorities likely to impair relevant provisions of the Convention and applicable instruments. It is not a legal assessment of Platform alerts and should not be treated or used as such.

by which it determines whether the interference:

⇒ is “prescribed by law”, i.e. sufficiently accessible, clear, unambiguous and precise to enable individuals to regulate their conduct;

⇒ “pursues one or more of the legitimate aims” set out in the provision, and

⇒ is “necessary in a democratic society” in order to achieve the legitimate aims.

In addition, the Court assesses other relevant provisions of the Convention in comparison, to strike a fair balance between freedom of expression and other affected human rights.

Standards of the Council of Europe

[Guidelines on Freedom of Peaceful Assembly \(3rd edition\), CDL-AD\(2019\)017rev](#), prepared by the OSCE/ODIHR and by the Venice Commission (15 July 2020):

- 193. The media have the right to record police activities at assemblies, subject only to reasonable time, place, and manner restrictions...;
- 196. No media credentials should be required to access or cover an assembly...;
- 197. ... Law enforcement authorities need to protect media professionals from violence or harm emanating from third persons, but are also obliged to exercise restraint and refrain from interfering with the work of journalists and other media representatives...;
- 201. ... In the event that a media representative is not wearing special clothing or badges identifying him or her as a journalist, the representative should still be permitted to conduct his/her journalistic work without interference once his/her identity and profession are known to the police...;
- 198. The fact that an assembly did not follow existing notification requirements, or state constraints or conditions does not restrict the media’s right to access or cover it.³⁸³ The mere occurrence of a demonstration, regardless of whether it is compliant with domestic legislation or not, may be newsworthy...;
- 202. Journalists are not participants in, but rather observers of, an assembly. In principle, therefore, dispersal orders directed at assembly participants should not oblige journalists to leave the area (unless their individual safety is endangered). Media representatives should not be prevented from observing and recording the policing operation, unless (exceptionally) their continuing physical presence will significantly hinder or obstruct law enforcement officers in doing their work...;
- 203. ... In the case of violence against media representatives, as in other instances of possible unlawful use of force, a thorough and independent investigation must be conducted and, if warranted, criminal charges should be sought - ultimately “to take all necessary steps to bring the perpetrators of crimes against journalists and other media actors to justice”.

Recommendation [CM/Rec\(2016\)4](#) of the Committee of Ministers to member States on the protection of journalism and safety of journalists and other media actors (13 April 2016):

- 14. Member States should take into account the specific nature and democratic value of the role played by journalists and other media actors in particular contexts, such as in times of crisis, during election periods, at public demonstrations and in conflict zones.
- In these contexts, it is important for law enforcement authorities to respect the role of journalists and other media actors covering demonstrations and other events.
- Press or union cards, relevant accreditation and journalistic insignia should be accepted by State authorities as journalistic credentials, and where it is not possible for journalists or other media actors to produce professional documentation, every possible effort should be made by State authorities to ascertain their status.
- Dialogue between State authorities and journalists’ organisations is moreover encouraged in order to avoid friction or clashes between police and members of the media.
- 22. Unregulated and arbitrary action by State agents is incompatible with effective respect for human rights. This means that, as well as being authorised under national law, policing operations, including the policing of public demonstrations, must be sufficiently regulated by it, within a system of adequate and effective safeguards against arbitrariness and abuse of force, and even against avoidable accident. This implies a need to take into consideration not only the actions of the law enforcement agents of the State who actually use force but also all the surrounding circumstances, including such matters as the planning and control of the actions under examination.
- A legal and administrative framework should define the limited circumstances in which law enforcement officials may use force and firearms, in the light of the international standards which have been developed on this topic. In this respect, a clear chain of command, coupled with clear guidelines and criteria are required; specific human rights training can help to formulate such guidelines and criteria.
- In any case, the undeniable difficulties inherent in the fight against crime cannot justify placing limits on the protection to be afforded in respect of the physical integrity of individuals and Article 3 of the Convention does not allow authorities to weigh the physical integrity of an individual against the aim of maintaining public order.

Case law of the European Court of Human Rights

Blocking of the applicant’s social networking account

Elvira Dmitriyeva v. Russia, applications Nos. [60921/17](#) and [7202/18](#), judgment of 30 April 2019

The applicant sought to hold a meeting to demand the resignation of the Prime Minister. The Kazan Town Administration refused to approve the venues she had suggested. She later posted a message on VKontakte criticising that refusal, which she had challenged before the courts, and announcing that the meeting would take place. The courts allowed her claim in part, finding that the administration's failure to propose an alternative venue was unlawful. The applicant subsequently held the meeting but was arrested and found guilty of organising and calling for participation in an unauthorised public event.

The European Court of Human Rights held that there had been a violation of Article 10 (freedom of expression) of the Convention, interpreted where appropriate in the light of Article 11, finding in particular that if people were forbidden by domestic law to "campaign" for participation in an unauthorised demonstration, the domestic courts had not explained how her VKontakte message had amounted to campaigning. The Court also found that her message had concerned a matter of public interest – allegations of high-level corruption – and expression on such matters attracted strong protection. Also, whereas authorities had to show tolerance for unlawful but peaceful gatherings, the demonstration had been banned on purely formal grounds rather than because of a risk of disorder, crime, or possible harm to public safety and the rights of others. In the Court's view, there had been no proper justification for interfering with her freedom of expression by convicting her for calling on people to take part in an event on an issue of public interest, particularly because her breach of the law had only been minor and there had never been a threat of disorder. There had therefore been no "pressing social need" for the interference with her freedom of expression.

The Court also found a violation of Article 5 § 1 (lawfulness of detention) of the Convention as her being escorted to the police station and being put under administrative arrest had not complied with Russian law and had not been "lawful" within the meaning of that provision.

Lack of proper justification of decision blocking an internet blog following posts calling to participate in an unauthorised public event

Kablis v. Russia, application No. [48310/16](#) and [59663/17](#), judgment of 30.4.2019

In September 2015, Grigoriy Kablis had informed the Syktyvkar Town Administration of a picket-style protest to discuss the arrest of Komi Republic officials on criminal charges. The Town Administration refused to authorise the picket, citing a regional law prohibiting public events in the requested part of the town and suggested another location. Kablis blogged about these developments and posted information on social networking site VKontakte. Given the refusal for a picket at his chosen site, he urged people to join him in a "people's assembly" and discussion there instead. His VKontakte account was blocked on the orders of a deputy prosecutor, who found that he had called for people to take part in an unlawful public event as the picket had not been approved. A separate order restricted access to three entries on his blog about the event on the same grounds. The courts dismissed all the challenges to these decisions.

The European Court of Human Rights held that there had been a violation of Article 10 (freedom of expression) of the Convention, finding that the orders to block the applicant's VKontakte account and to restrict access to three Internet entries on the planned demonstration had amounted to a "prior restraint" as prosecutors had acted before any court decision on the content being illegal. Such prior restraints were only justified in exceptional circumstances and required a clear legal framework so the courts could review them effectively. The Court noted that prosecutors had wide powers to block access to Internet content on taking part in unauthorised demonstrations. That wide discretion also hampered the courts in providing an effective review of such decisions and meant successful legal challenges were likely to be difficult. The one-month deadline for such reviews meant they might not finish before the event itself, depriving the proceedings of their meaning. The blocking procedure thus lacked the necessary guarantees against abuse which were required in the Court's case-law on prior restraint measures.

The Court found that the Internet posts themselves had concerned a picket on matters of general public interest, that only about 50 people had been expected to attend, and that the applicant had not called for violence or disorder. The breach of the procedure for the conduct of public events had therefore been of a purely formal nature and minor in nature. It held that there had been no pressing social need for prior restraint measures and the courts had not given "relevant and sufficient reasons" for interfering with the applicant's rights.

Administrative arrest of a journalist at an anti-globalisation march

Butkevich v. Russia, application No. [5865/07](#), judgment of 13.2.2018

The applicant, a journalist, was arrested by two police officers at an anti-globalism march in St Petersburg, where he was taking photographs. He was subsequently prosecuted for disobeying police

orders and brought before a court in an expedited procedure under the Code of Administrative Offences. He was convicted and sentenced to three days' detention, reduced to two days on appeal.

The European Court of Human Rights held that there had been a violation of Article 5 § 1 (lawfulness of detention) of the Convention, observing that neither the domestic authorities nor the respondent Government provided any justification for the administrative arrest, namely that there were "exceptional circumstances" and/or that it was "necessary for the prompt and proper examination of the administrative case and to secure the enforcement of any penalty to be imposed". It was incumbent on the domestic authorities to ascertain that the deprivation of liberty was "reasonably considered necessary" in the circumstances of the case "to prevent [a person from] committing an offence or fleeing after having done so". At the same time, the authorities should have borne in mind that the measure had been applied in the context of an administrative offence and, possibly, in the context of the exercise of a fundamental right or freedom, such as freedom of expression. Article 5 § 1 of the Convention requires that for deprivation of liberty to be considered free from arbitrariness, it does not suffice that this measure is taken and executed in conformity with national law; it must also be necessary in the circumstances. Detention pursuant to Article 5 § 1 (c) must embody a proportionality requirement, which implies a reasoned decision, balancing relevant arguments for and against release. For these reasons, the Court was not satisfied that the applicant's administrative arrest complied with Russian law so as also to be "lawful" within the meaning of Article 5 § 1 (c) of the Convention.

Forcible removal of journalists from press gallery of Parliament during disturbance in the chamber

Selmani and Others v. the Former Yugoslav Republic of Macedonia, application No. [67259/14](#), judgment of 9.2.2017

The applicants were journalists covering a parliamentary debate when a commotion provoked by a group of MPs broke out, triggering the intervention of security staff. When the applicants refused to comply with an order to vacate the gallery, they were forcibly removed. The Constitutional Court found that the security staff had considered that the journalists needed to be moved for their own protection. In the Convention proceedings, the applicants complained about their forcible removal from the Parliament gallery.

The European Court of Human Rights held that there had been a violation of Article 10 (freedom of expression) of the Convention, considering that the central issue was whether the interference complained of was necessary in a democratic society. The Court reiterated that the media play a crucial role in providing information on the authorities' handling of public demonstrations and the containment of disorder. Any attempt to remove journalists from the scene of demonstrations has to be subject to strict scrutiny. That principle applies even more so when journalists exercised their right to impart information to the public about the behaviour of elected representatives in Parliament and about the manner in which authorities handled disorder that occurred during parliamentary sessions.

The Court noted that during the disturbance in the chamber, the applicants were passive bystanders who were simply doing their work and observing the events. They did not pose any threat to public safety, order in the chamber or otherwise. It held that their removal entailed adverse effects that instantaneously prevented them from obtaining first-hand and direct knowledge based on their personal experience of the events unfolding in Parliament. Those were important elements in the exercise of the applicants' journalistic functions, of which the public should not have been deprived.

Photographer's apprehension and conviction for disobeying the police while covering a demonstration

Pentikäinen v. Finland [GC], application No. [11882/10](#), judgment of 20.10.2015

The applicant was a photographer and journalist working for a Finnish magazine. In 2006 he was sent to report on a demonstration in Helsinki. Although a separate secure area had been reserved for the press, the applicant decided not to use it and stayed with the demonstrators. When the demonstration turned violent, the police sealed off the area concerned and ordered the protesters to disperse. The applicant remained at the scene as he believed that the police order only applied to the demonstrators. Shortly afterwards he was arrested along with the remaining demonstrators and detained for over 17 hours. Subsequently, a district court found him guilty of disobeying police orders but decided not to impose a penalty. That decision was upheld on appeal and the applicant's subsequent complaint to the Supreme Court was rejected.

The European Court of Human Rights held that there had been no violation of Article 10 (freedom of expression) of the Convention, noting that Pentikäinen's apprehension had taken place in the cordoned-off area where he had remained together with a core group of demonstrators. From the video recordings of the event in the case file, it appeared that he had not been wearing any distinct signs which would have

identified him as a journalist, nor had his press badge been visible. The Court held that, while the police had to have learned about his status as a journalist at the latest at the police station, when one police officer had taken his press card, Pentikäinen had failed to make it sufficiently clear earlier during the events that he was a journalist. By not obeying the orders given by the police, Pentikäinen had knowingly taken the risk of being apprehended. The Helsinki District Court had found it established that he had been aware of the police orders to leave the scene but that he had decided to ignore them. Nothing suggested that he could not have continued to exercise his professional assignment in the vicinity of the cordoned-off area, had he obeyed the order. As regards his detention, the Court noted that the journalist had been one of the first of the people apprehended to be interrogated by the police and shortly after he had been released. While his camera equipment had been taken away for the duration of his detention, the camera and the photographic material had been returned to him entirely and unaltered. Concerning his conviction, the Court noted that the journalist had been found guilty of disobeying the police, but that no penalty had been imposed. His conviction had had no adverse consequences for him: as no sanction had been imposed, the conviction had not, in accordance with national law, been entered in his criminal record.

Ill-treatment by police of journalist attempting to report on covering an unauthorised demonstration and inadequate investigation

Najafli v. Azerbaijan, application No. [2594/07](#), judgment of 2.10.2012

Editor-in-chief of Boz Qurd, Mr Najafli had been beaten by the police, while covering an unauthorized demonstration in Baku. On 26 October 2005, he was diagnosed with closed cranio-cerebral trauma, concussion and soft-tissue damage to the crown of the head. A criminal investigation on suspected "obstruction of the lawful professional activity of journalists" was opened into how Najafli sustained these injuries. On 9 March 2006, after the Riot Police (A.V.) had denied any involvement in Najafli's beating, the Sabail District Prosecutor's Office investigator issued a decision suspending the criminal proceedings until the perpetrators of the beating had been identified. An appeal of the suspension of the investigation was dismissed on 13 June 2006.

The European Court of Human Rights held that there had been a violation of Article 3 (prohibition of torture) and a violation of Article 10 (freedom of expression) of the Convention, considering that Najafli had produced sufficiently strong and consistent evidence to establish at least a presumption that he had been beaten with truncheons by police officers during the dispersal of the demonstration, including the medical certificate of 26 October 2005, statements from two witnesses supporting his version of the events and a photo confirming A.V.'s presence at the scene of the incident. As to whether the use of force against Najafli had been excessive, the Court noted that the applicant had not used violence against the police or posed a threat to them. Nor had the authorities given any other reasons justifying the use of force, which had therefore been unnecessary, excessive and unacceptable. The Court found that Najafli's injuries had proven that he had experienced serious physical pain and suffering. Indeed, the cranio-cerebral trauma and concussion had required long-term medical treatment and the ill-treatment, as well as its consequences, had to have also caused him considerable mental suffering, diminishing his human dignity. Consequently, the minimum level of severity required under the Convention for the ill-treatment to come within the scope of Article 3 of the Convention had been attained. The court also observed that no relevant procedural steps had been taken until Najafli had been questioned, more than three months after the incident, and that no documentary evidence had been produced as to the allegedly ordered forensic examination. Turning to what the Court considered the most problematic aspect of the investigation, it observed that the identification of those responsible for the applicant's beating had been delegated to the same authority whose agents had allegedly committed the offence. Even if another police department had been in charge of this major part of the investigation, the agents had been colleagues, employed by the same public authority. As regards the suspension of proceedings, the Court noted that the Sabail District Prosecutor's Office investigator, relying on the "no result" report of the police department, had merely suspended the investigation without taking any further action. Finally, the applicant had been deprived of the opportunity to effectively seek damages in civil proceedings, as he had been required to name specific police officers as defendants. That requirement had constituted an insurmountable obstacle given that the criminal investigation had not identified those police officers. The court further reiterated that it was the role of the press to impart information and ideas on matters of public interest and that the public had a right to receive them, including concerning opposition gatherings and demonstrations. This was essential for the development of any democratic society and for the press to play its vital "public watchdog" role. The Court could not accept the Government's argument that police officers had been unable to determine that Najafli had been a journalist. Indeed, he had been wearing a journalist's badge and had even specifically told the police officers that he had been a journalist. Moreover, the Court considered that the physical ill-treatment by State agents of journalists performing their professional duties had seriously hampered the exercise of their right to receive and impart information. Irrespective of whether there had been any actual intention to interfere with Najafli's journalistic activity, he had been subjected to unnecessary and excessive use of force, in breach of Article 3, despite having made clear efforts to identify himself as a

journalist at work. Accordingly, there had been an interference with Najafli's rights under Article 10 of the Convention, which had not been "necessary in a democratic society", as the Government had not shown convincingly that this interference had been lawful or pursued a legitimate end.

Journalist allegedly hit by a police officer while covering a protest

Rizvanov v. Azerbaijan, application No. [31805/06](#), judgment of 17.7.2012

A former journalist, Sarvan Samad oglu Rizvanov alleged that a police officer had hit him with a truncheon in November 2005, while he was covering a protest. He also contended that the ensuing investigation into the incident had been ineffective.

The European Court of Human Rights held that there had been a violation of Article 3 (prohibition of torture) of the Convention, considering that the applicant had been able to produce sufficiently strong evidence supporting the fact that he was subjected to the use of force by the police. In particular, Rizvanov produced a medical certificate delivered a day after the incident, certifying that he had contusions of the left leg and left upper arm, as well as witness testimonies that supported his allegation. The Court further noted it was undisputed that the applicant had not used violence against the police or pose a threat to them. Moreover, it had not been convincingly established at the outcome of the criminal investigation and other domestic proceedings that, by using a metal construction as a viewpoint, the applicant was actually creating serious danger for the people. In such circumstances, the Court considered that the Government had not shown convincingly that the recourse to physical force against the applicant had been made strictly necessary by his own conduct. It therefore concluded that the use of force had been excessive and unnecessary. Despite the relatively minor character of injuries sustained by the applicant, the Court considered that the ill-treatment complained of was such as to arouse in the applicant feelings of fear, anguish or inferiority and capable of humiliating and debasing him. It found the ill-treatment sufficiently serious to attain the minimum level of severity to be considered as inhuman and degrading treatment under Article 3. As to the investigation into the alleged ill-treatment, the Court noted that the authorities refused to give any importance to the medical certificate and failed to order a forensic examination until twenty-one days after the incident. The Court reiterated that a failure to secure the forensic evidence in a timely manner is one of the most important factors in assessing the overall effectiveness of an investigation into allegations of ill-treatment. It therefore held that the investigation into Rizvanov's claim of ill-treatment fell short of the requirements of Article 3 and dismissed the objection as to the exhaustion of domestic remedies.

Journalist's inability to gain access to Davos during the World Economic Forum owing to a general police ban following fear of unauthorised demonstration and disturbances

Gsell v. Switzerland, application No. [12675/05](#), judgment of 8.10.2009

The applicant, who had been asked to write an article on the events and their effects on local restaurants and hotels, was refused access to the annual meeting of the World Economic Forum (WEF) in Davos by the police, who had put in place numerous security measures after being informed that an unauthorised demonstration and disturbances were planned.

The European Court of Human Rights Court held that there had been a violation of Article 10 (freedom of expression) of the Convention, considering that the ban imposed on the applicant had not had any explicit legal basis. It acknowledged that it had been extremely difficult for the authorities to weigh up the situation and make a precise assessment of the risks inherent in the WEF and the anti-globalisation demonstrations in terms of public order and safety. Nevertheless, the Court was not satisfied that the scale of the demonstrations which actually took place had been unforeseeable for the competent authorities, in view of previous events around the globe and in the context of the WEF. Furthermore, the authorities had made no distinction between potentially violent individuals and peaceful demonstrators. The applicant had therefore been the victim of a general ban imposed by the cantonal police on all persons wishing to travel to Davos. In view of the specific circumstances of the case, the competent authorities had not been entitled to make use of the general police clause. The authorities' refusal to allow the applicant into Davos had therefore not been prescribed by law.

Other relevant Council of Europe instruments

Committee of Ministers

[Recommendation Rec\(2016\)4](#) to Member States on the protection of journalism and safety of journalists and other media actors (13 April 2016)

[Declaration](#) on the protection of journalism and safety of journalists and other media actors (30 April 2014)

[Guidelines](#) on eradicating impunity for serious human rights violations (30 March 2011)

Parliamentary Assembly

Resolution [2317\(2020\)](#) "Threats to media freedom and journalists' security in Europe" (28 January 2020)

Resolution [2275\(2019\)](#) "The role and responsibilities of political leaders in combating hate speech and intolerance" (10 April 2019)

The role and responsibilities of political leaders in combating hate speech and intolerance, [Report 14845](#) by Elvira Kovács (20 March 2019)

[Resolution 2141\(2017\)](#) "Attacks against journalists and media freedom in Europe" (24 January 2017)

Attacks against journalists and media freedom in Europe, [Report 14229](#) by Volodymyr Arieu (9 January 2017)

Resolution [2116\(2016\)](#) "Urgent need to prevent human right violations during peaceful protests" (27 May 2016)

Urgent need to prevent human rights violations during peaceful protests, [Report 14060](#) by Mehmeti Devaja (10 May 2016)

Resolution [2035\(2015\)](#) "Protection of the safety of journalists and of media freedom in Europe" (29 January 2015)

Protection of media freedom, [Report 13664](#) by Gvozden Flego (12 January 2015)

[Resolution 1920\(2013\)](#) "The state of media freedom in Europe" (24 January 2013)

The state of media freedom in Europe, [Report 13078](#) by Mats Johansson (7 December 2012)

Respect for media freedom, [Report 12102](#) by Andrew McIntosh (6 January 2010)

[Private military and security firms and the erosion of the state monopoly on the use of force, Report 11787](#) by Wolfgang Wodarg (22 December 2008)

Resolution [1636\(2008\)](#) "Indicators for media in democracy" (3 October 2008)

Indicators for media in democracy, [Report 11683](#) by Wolfgang Wodarg (7 July 2008)

[Resolution 1535\(2007\)](#) "Threats to the lives and freedom of expression of journalists" (25 January 2007)

Threats to the lives and freedom of expression of journalists, [Report11143](#) by Andrew McIntosh (23 January 2007)

Commissioner for Human Rights

Protection of journalists from violence, Issue paper [ComDH\(2011\)3](#) (4 October 2011)

Positions on freedom of the media, [CommDH/PositionPaper\(2010\)2](#) (3 May 2010)

Venice Commission

[Guidelines on freedom of peaceful assembly \(3rd edition\)](#), [CDL-AD\(2019\)017rev](#) (15 July 2020)

Rule of Law Checklist, [CDL-AD\(2016\)007](#) (11-12 March 2016)

[Report on the democratic oversight of the security services](#), [CDL-AD\(2015\)010](#) (15 December 2015)

[Compilation of opinions concerning freedom of assembly](#), [CDL-PI\(2014\)003](#) (1 July 2014)

[Report on private military and security firms and erosion of the state monopoly on the use of force](#), [CDL-AD\(2009\)038-e](#) (29 June 2009)

Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment

[Preventing police torture and other forms of ill-treatment, Extract from the 28th General Report on the CPT's Activities](#), [CPT/Inf\(2019\)9](#)

[Access to a lawyer as a means of preventing ill-treatment, Extract from the 21st General Report on the CPT's Activities, CPT/Inf\(2011\)28-part1](#)

Developments concerning CPT standards in respect of police custody, Extract from the 12th General Report on the CPT's Activities, [CPT/Inf\(2002\)15](#)

Foreign nationals detained under aliens legislation, Extract from the 7th General Report on the CPT's Activities, [CPT/Inf\(97\)10](#)

Police custody, Extract from the 2nd General Report on the CPT's Activities, [CPT/Inf\(92\)3-part1](#)

European Convention for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment, [ETS No. 126](#) (26 November 1987), with Protocols 1 and 2, [ETS No. 151](#) and [ETS No. 152](#) (4 November 1993)

European Convention on the Compensation of Victims of Violent Crime

[European Convention on the Compensation of Victims of Violent Crime, ETS No. 116](#) (24 November 1983)

Council of Europe Convention on preventing and combating violence against women and domestic violence

Convention on preventing and combating violence against women and domestic violence, [CETS No. 210](#) (11 May 2011)

Other Factsheets

[Positive obligations](#) to protect journalists and the freedom of expression

"Prior [restraints](#)" and freedom of expression: the necessity of embedding procedural safeguards in domestic systems

[Fairness](#) of criminal proceedings against media representatives

[Harassment](#) and intimidation of journalists

Custody, [detention](#) and imprisonment of journalists

[Impunity](#) of the perpetrators of physical attacks on journalists

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[Attacks](#) on the physical integrity of journalists