**INCARCERATION AND HUMAN RIGHTS VIOLATION**

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**ABSTRACT-**

Human Rights are implicit rights to all human beings without discrimination extraneous to citizenship, place of residence, sex, religion, ethnic origin, language, or any other status. The term “prisoner” means an inmate deprived of his or her liberty, kept under confinement in prison for doing any act forbidden by the law of the land. They are still humans and are entitled to human rights, but the practice of torture in prison is predominant and is inflicted in an unrestricted manner. This write up analyses the violation of human rights of prisoners and various other problems associated with it in national as well as international perspective. The main rationale of this paper is to highlight the disturbing condition of the prisons and how the prisoners are exposed to humiliation, harsh conditions, and violence without any recognition of human dignity. It also examines the application of the principle of non-discrimination in the face of the realities of detention. Moreover, it will discuss the intervention and major steps taken by the judiciary in this regard.

**Keywords-** Human Rights, Prisoner Rights, non-discrimination, human dignity, judiciary.

**INTRODUCTION**

***"It is said that no one truly knows a nation until one has been inside its jails. A nation should not be judged by how it treats its highest citizens, but its lowest ones."***

**-Nelson Mandela**

According to Article 1 of the Universal Declaration of Human Rights(UDHR), all individuals are born independent, free, and equivalent in dignity and rights. They are endowed with reason and conscience and should act appropriately, living in a high spirit of love and brotherhood.[[1]](#footnote-2)

Human Rights are implicit rights to all human beings without discrimination extraneous to citizenship, place of residence, sex, religion, ethnic origin, language, or any other status.These inalienable entitlements are interrelated, interdependent, and universal in nature forming the cornerstone of the international human rights law. These irreducible minima are demonstrated and ascertained by law in various forms i.e. treaties, statues, international law, and general principles. Non- discrimination is a *sine-qua-non* philosophyin the International Human Rights law.Established on honour for the worth of a person, these rights are neither privileges nor endowments, in fact, these are entitlements that cannot be taken away by any arbitrary power and cannot be forfeited even if an individual has perpetrated any offence.This principle was first highlighted in the Universal Declaration of Human Rights in 1948 which proclaimed a common standard of achievement for all peoples and all nations, to promote respectand freedom and, to secure their universal and effective recognition and observance among all members of the human family[[2]](#footnote-3). Later, it was reiterated in differing international conventions and declarations to protect and promote all fundamental human rights.

Prisons, also known as a penitentiary, detention centre, etc are used to punish the aberrant actions of a miscreant, it acts as an arm of the criminal justice system and if it falls flat then it will make the entire criminal methodology inefficacious. It comes under the State List of the seventh schedule of the Constitution of India. Earlier, the inmates were dealt awfully, but the advancement of human rights statues has substantially changed the mandate behind discipline for a crime. These statues advocate that no offence ought to be punished in a disreputable and a pitiable way. There has been a significant change in the correctional apparatus of the criminal equity framework. Prisons mainly serve three purposes as that of the imposition of punishment, reformation, and protection of prisoners.

**WHO ARE PRISONERS?**

Justice V.R. Krishna Iyer has rightly said-“In our world prisons are still laboratories of torture, warehouses in which human commodities are sadistically kept and where spectrums of inmates range from driftwood juveniles to heroic dissenters”

“Prisoner” means any human being for the time being in a detention centre as an outcome of any prerequisite imposed by a court or else that he be detained in legal custody.[[3]](#footnote-4)The term “prisoner” means an inmate deprived of his or her liberty, kept under confinement in prison for doing any act forbidden by the law of the land. The criminals are still well-endowed with all the facets of human beings which demand him to be treated with grandeur and reverence. Prisoners are not denuded from their pivotal fundamental rights.

**RIGHTS OF PRISONERS :**

Article 5 of the UDHR states that-“No one shall be exposed to torture or brutal, inhuman or degrading treatment or punishment”[[4]](#footnote-5)

India is a multi-cultural country rich in diversity of the multi-ethnic and multi-religious population. The state must safeguard its individuals from the excesses of the state also on structure proper social set-up during which individuals can evolve to their maximum. The practice of torture in prison is predominant and is inflicted in an unimpeded manner since time immemorial. Torment is effectuated in an unrestricted manner not only upon the person under suspicion but also upon bona fide complainants and petitioners in the name of investigation of crime. Women are molested and maltreated amounting to barbaric and inhuman treatment grossly deteriorating human dignity. The major quandary of confronting against custodial torture is that the sufferer remains tormented for the repercussions that will lead them to consequential premonition and because of this many cases go unreported. If somehow the case has been filed, it becomes tremendously complicated to prove it since the witness keeps mum fearing its after-effects.

The irrevocable Human Rights are guaranteed by the Constitution of India in the form of Fundamental Rights. Moreover, Human Rights in India are secured under the Human Rights Act,1993 and according to this Act, “human rights means the rights concerning life, liberty, equality and dignity of the individual guaranteed by the Constitution or embodied within the International Covenants and enforceable by Courts in India.[[5]](#footnote-6)”The National Human Rights Commission, a statutory public body, and various State Human Rights Commissions were constituted under the Protection of Human Rights Act, 1993 for quick and better handling of human rights casesso that justice might be served to everyone.India is a signatory to numerous international declarations and covenants which guarantees the protection of human rights of prison inmates, just like the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights, etc. which creates an obligation to fully comply with it and treat the prisoners accordingly.

The wide interpretation of Article 21 by the Supreme Court has led to the development of human rights jurisprudence for the preservation of prisoners’ rights. Article 21 casts an obligation upon the State to preserve the lifetime of everyone, whether innocent or guilty.[[6]](#footnote-7) Article 14 provided the concept of reasonable classification and contemplated that like should be treated alike, based on which the prison authorities determine and classify the prisoners with the objective of their reformation. Until and unless the liberty of a prisoner has been constitutionally curtailed which is subjected to reasonable restrictions, the prisoner is entitled to all the constitutional rights.Article 19 of the Constitution of India guaranteescertain freedoms that cannot be claimed by the prisoners because of the very nature of these freedoms. The convicts by mere reason of their conviction are deprived of their fundamental right to move freely throughout the territory of India or the right to practice a profession.[[7]](#footnote-8)

The basic rights implicitly provided under the Constitution of India includes- Rights of inmates of protective homes[[8]](#footnote-9); right to free legal aid[[9]](#footnote-10); right to a speedy trial[[10]](#footnote-11); right to a timely information of the ground of the arrest[[11]](#footnote-12); right against cruel and unusual punishment[[12]](#footnote-13); right to a fair trial[[13]](#footnote-14);right against self-incrimination[[14]](#footnote-15);right against custodial violence and death in police lock-ups or encounters[[15]](#footnote-16); right to live with human dignity[[16]](#footnote-17); right to meet friends and consult a practitioner of his choice[[17]](#footnote-18); Rights against solitary confinement, handcuffing & bar fetters and protection from torture[[18]](#footnote-19); Right to reasonable wages in prison[[19]](#footnote-20); Right to compensation for wrongful arrest, detention, and torture[[20]](#footnote-21); right of release and rehabilitation of bonded labour[[21]](#footnote-22); Right to minimum freedom of movement and use of handcuffs as a last refuge[[22]](#footnote-23); right against double jeopardy[[23]](#footnote-24) and many more.

It is significant to notice that an undertrial or convicted prisoner can’t be subjected to a physical or mental restraint- a) which is not warranted by the punishment awarded by the court, or b) which is more than the wants of prisoner’s discipline, or c) which constitutes human degradation.[[24]](#footnote-25)

**PRISON LAW OF INDIA**

The management of Prison is run by the sole consolidated framework, the Prisons Act of 1894, and Prison Manuals whose ambit lies under the respectiveGovernment. It’s the preliminary authorization of the state to manage rules and regulations of prisons.

This Act states that the State Government shall provide, for the prisoners, accommodation, and sanitary facility in prisons constructed and controlled in a proper manner[[25]](#footnote-26);there’s a provision regarding temporary shelter and safety of the additional number of prisoners who cannot be kept in any prison safely[[26]](#footnote-27); this act lays down the rule that each prisoner should be examined by a medical officer as soon as possible after admission[[27]](#footnote-28); it mentions separation of male and feminine prisoners, convicted and under trial prisoners, civil and criminal prisoners, and prisoners who have attained puberty separate from the ones who haven’t.[[28]](#footnote-29)There has got to be a medically approved diet and work allocation for pregnant prisoners[[29]](#footnote-30); an expecting mother shall be entitled to grant of parole for thirty days[[30]](#footnote-31); It consists of provisions concerningthe skill training in prisons for education and rehabilitation.[[31]](#footnote-32)

**INCOMPETENCY OF THE LAW**

Muchstatutory legislation and various precedents have been laid down in numerous cases which provide for the rights which these prisoners are entitled to but the time again it’s been proved that these centurion old laws are inefficacious in today’s age and time to deal effectively with prisoners right and to reform them in a humanitarian manner. This colonial-era law is filled with lacunae of stringent legislation because it focuses on the functioning of the prison instead of dealing with reformation and rehabilitation of prisoners on humanitarian grounds who deserve to live their life with dignity.

The prison system is overcrowded by 250% and cells of 8×10 feet frequently house 21 people, contrary to the UN specification of roughly 6×12 feet per person. The main problems faced by the prison inmates include not being granted bail, long detention of these awaiting trial, inadequate opportunities for prisoners to speak with counsel, administrators, and family, visiting rights being curbed, overcrowding, poor sanitary conditions, and inadequate food and clothing. Due to such inhuman conditions, HIV, tuberculosis, and other vector-borne diseases and infections are rife, while medical treatment is deficient, especially about poor inmates.A total of 1,584 deaths in jails were reported during the year 2015. Incidents of prison abuse and torture are quite common and often go unreported.[[32]](#footnote-33)

The central jails are overcrowded by 118.6 percent, while the district jails are overcrowded by 126.9 percent. The utmost number of overcrowding is recorded in Chhattisgarh to 256.3 percent, Uttar Pradesh 175.1 percent, Maharashtra and Jharkhand upto 128.1 percent, followed by Assam, West Bengal and Bihar recording 109.6 percent, 94.4 percent and 83 percent respectively (Prison Statics India, 2011, National Crime Record Bureau)Thousands of poor persons including Dalits, Muslims, women, and juveniles languish within the jails and police lockups, without due process of law. Women with children and the unsound are among the worst-affected groups.Statistically,1,400 children below the age of five are accompanying their mothers in jails. The absence of ample medical and psychiatric services contributes to the deplorable conditions. Persons with various mental illnesses, categorized as “non-criminal lunatics,” are often imprisoned. With several mentally vulnerable prisoners left to agonize without support in a barbaric environment, there is a high rate of suicides of prison inmates and police detainees. In the 1980s, the All India Commission for Jail Reforms,‘The Mulla Commission’ found that the majority of the prison inhabitants were from a “rural and agricultural background”. Many prisoners were imprisoned for non-payment of fines or because there was nobody to bail them out, even if the bail amount was a paltry Rs. 500, or due to the inability to afford good representation. As a result, first-time offenders or persons held for petty crimes spent years, sometimes decades within the company of hardened criminals.[[33]](#footnote-34)

**ROLE OF JUDICIARY**

The Supreme Court of India in the present day has been very observant against encroachments upon the Human Rights of the prisoners. Article 21 of the Constitution of India provides that “No person shall be bereft of his life and distinctive Liberty except in consonance to procedure established by law”. The rights to life and privateliberty is the back bone of the Human Rights.Where the legislature and executives have failed to label the plight of the prisoners, the judiciary has been playing the role of a rescuer. The Supreme Court has been empathetic towards shielding the human rights of people and has forged new tools and formulated new remedies through judicial activism for the purpose of vindicating the Human Right to Life and Personal Libertyof prisoners by interpreting Articles 21, 19, 22, 32, 37 and 39-A of the Constitution in a pragmatic and humane way.

**Joginder Kumar v. State of UP and Ors.**

“The standard of a nation’s civilization can be majorly measured by the technique it uses in the imposition of criminal law.The horizon of human rights is broadening andat the equivalent time, the crime rate is also escalating. The court has been getting complaints about violation of human rights as a consequence of indiscriminate arrests. A realistic approach should be made in this direction. The law of arrest stabilizes individual rights, liberties and privileges, on one hand and individual duties obligations and responsibilities on the other; of weighing and balancing the rights, liberties and privileges of the single individual and those of individuals collectively; of simply deciding what is needed and where to put the weight and the emphasis; of finalizing which comes before­– the criminal or society, the law offender or the law abider[[34]](#footnote-35)

**Rama Murthy v. State of Karnataka**[[35]](#footnote-36)

The hon’ble Supreme Court in this case highlighted major problems faced by Indian Prisoners such as delay in trail; no release of prisoners even after the grant of bail; lack of medical aid; callous attitude of jail authorities; difference in punishment given by court as compared to the punishment carried out by the jail authorities; physical and mental torture, corruption and other malpractices.

In the famous case of Charles Sobraj through Marie Andre’o vs. The Superintendent, Central Jail, Tihar, New Delhi (1978),Krishna Aiyerof Supreme Court held, “….imprisonment doesn’t not spell farewell to fundamental rights although, by a sensible re-appraisal, Courts will refuse to acknowledge the complete panoply of Part III enjoyed by a free native”. In addition, he held that imprisonment of a prisoner is not merely retribution or deterrence but also rehabilitation. He analysed, “Social defence is the raison d’etre of the Penal Code and bears upon judicial authority over prison administration. In the entire atmosphere of constant fear of violence, frequent torture and denial of opportunity to improve oneself is created or if medical facilities and basic elements of safe keeping and comfort obligatory to sustain life are denied, then also the humane jurisdiction of the Court will become operational based on Article 19.[[36]](#footnote-37)

**T.V. Vatheeswaran v. State of Tamil Nadu***[[37]](#footnote-38)*,

In this case, it was concluded by the Supreme Court that the prison walls do not keep out fundamental rights and the articles 14, 19, and 21can be claimed by the prisoners similarly as a freeman.

**People’s Union of Democratic Rights v. Union of India***[[38]](#footnote-39)*

This case majorly focused on the significance of an individual’s dignity and held that state cannot deny these exquisite rights without rational procedure established by law.

**Sunil Batra v. Delhi Administration***[[39]](#footnote-40)*

In this case, recommendations were made in order to shield the rights of the prisoners. It suggested that inmates under the death penalty shall not be denied of any community amenities such as newspapers, games and books, movement across prison, meeting with friends and family subjected to reasonable rules of prison management. The court stated that heedless handcuffing and chaining in public, puts to humiliation and is a slur on our culture. It laid down the guideline that the perpetrator should be given a chance for hearing before applying fetters and bar fetters should not be imposed arbitrarily.

**INTERNATIONAL PERSPECTIVE**

There are many international instruments like that governs and promotes universal respect for observance of human rights of jail prisoners. These instruments create an obligation on the member states to protect and implement all human rights by adopting necessary steps.

**The Universal Declaration of Human Rights(UDHR)**

It was adopted on December 10, 1948 by the General Assembly of the United Nations to promote and protect the universal human rights without any discrimination. It posits that the fundamental Right to Life is obtainable to prisoner or to freemen. The jailbird should not be subjected to torture, inhuman treatment or degrading punishment during his incarceration. It further states that no one shall be forced upon to arbitrary arrest, detention or exile[[40]](#footnote-41). Anyone charged with a penal offence has the right to be assumed innocent until proven guilty according to law in a public trial at which he has had all the guarantees required for his defence.[[41]](#footnote-42)

**The International Covenant on Civil and Political Rights (ICCPR)**

This is the core international treaty on the protection of human rights of jail prisoners which was adopted by the General Assembly of the United Nations on December 16, 1966. Similar to UDHR, the ICCPR also provides that no prisoner should be deprived of his right to life and this right should be protected by law[[42]](#footnote-43) Article 7 of this treaty imposes the duty on the states to not to inflict torment and degrading treatment on the inmates. Article 10 of the ICCPR states that every individual deprived of his or her liberty shall be treated with dignity on humanitarian grounds.[[43]](#footnote-44) It segregates the accused from the convicted persons and must be accorded treatment appropriately.[[44]](#footnote-45)Similarly, juvenile persons should be separated from adults as brought as soon as possible for adjudication.[[45]](#footnote-46)

**The United Nations Standard Minimum Rules for the Treatment of Prisoners**

Adopted by First United Nations Congress on the Prevention of Crime and the Treatment of Offenders, 1955 and approved by the Economic and Social Council , This United Nations Standard lays down many rules concerning the treatments of prisoners. Rule 9 to rule 14 consists of provisions relating to the accommodation of prisoners. Rule 17-19 related to their clothing and bedding. Rule 20 has guidelines as regards to the food to be provided to the inmates. Rule 21 regulates the exercise and sport facilities and rule 22-26 takes care of the medical requirements. This standard minimum rules also contains provisions relating to the protection against double jeopardy[[46]](#footnote-47); it prohibits corporeal and barbaric treatment[[47]](#footnote-48) and many more.

**The European Convention for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment**

Entered into force on 1 March 2002, The European Convention for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment establishes European Committee for the Prevention of Torture and Inhuman or Degrading Treatment. The Committee is permitted to go to all places of detention, defined by the convention as “any place within its jurisdiction where persons are bereft of their liberty by a public authority.” Once a government is notified of the intention of the Committee to hold out a visit it's required to permit access to the territory with the proper to free travel without restriction, full information of the power in question, unlimited access to the power and free movement within it, the proper to interview a person being held within the power , communicate freely with a person whom it believes can supply relevant information and access to the other information which the Committee feels is important to hold out its task. All information collected is confidential. In exceptional circumstances a state may make representations supported grounds of national defence, public safety, and high disorder in custodial facilities against a visit to a particular place or at a particular time. After each visit a report is involved with any possible recommendations to the state in question.

## The International Covenant on Economic, Social and Cultural Rights (ICESR)

The International Covenantstates that prisoner inmates have a right to the highest achievable standard of physical as well as mental health[[48]](#footnote-49).

## Declaration on Protection from Torture, 1975

This declaration, aggregated by the UN General Assembly acts in tandem with the human rights principles of a human being and shields that person from any kind of torture, or inhuman and barbaric behaviour.[[49]](#footnote-50)

## Convention against Torture and other Cruel, Inhuman or Degrading Treatment

This document was adopted bythe UN assembly, wherein the liability is shouldered on the state to take steps for effectual judicial, legislative and administrative methods. Further, it clearly lays down the principles for interrogation and similar other instructions have been enumerated.[[50]](#footnote-51)Though this is often a concrete piece of legislation but unfortunately India has yet not ratified thereto.

**CONCLUSION**

The existing state of prison is piteous and disturbing. A prisoner does not cease to be a human being or a legal person so he is still entitled to Claim human rights. Many poor prisoners face a very tough challenge and undergo so much torment in order to secure their basic human rightsand live with dignity inside the premises of detention centres. Legal aid services which is widely apprehended as a privilege rather than a matter of right is barely available to the prisoners. Though it is a right, but it is far from the reality. Various boards set up the state and central government has proven to be inefficient in dealing with burgeoning number of casesA definite amount of sternness is required to ensure prompt disposal of cases without any prolonged delay. The need of the hour is to reform the existing obsolete colonial era Prisons laws so as they fulfil present day requirements. In a broader aspect, it is really important to fortify the surroundings of prisoners. For the betterment of prisoners, there is a need to renovate and refurbish the penitentiaries as well as make them aware about their rights.

1. Universal Declaration of Human Rights 1948, s 1 [↑](#footnote-ref-2)
2. Universal Declaration of Human Rights 1948, pmbl [↑](#footnote-ref-3)
3. The Prison Security Act 1992, s 1(6) [↑](#footnote-ref-4)
4. The Universal Declaration of Human Rights 1948, s 5 [↑](#footnote-ref-5)
5. The Protection of Human Rights Act1993, s 2(1) (d) [↑](#footnote-ref-6)
6. Paramanand v. Union of India, (1989) 4 SCC 286 [↑](#footnote-ref-7)
7. State of Andhra Pradesh v. Challa Ram Krishna Reddy*,* AIR 2000 SC 2083*.* [↑](#footnote-ref-8)
8. UpendraBaxi v. State of U.P., (1983) 2 SCC 308 [↑](#footnote-ref-9)
9. The Constitution of India 1950,art 39-A. [↑](#footnote-ref-10)
10. Ibid. art 21 [↑](#footnote-ref-11)
11. Ibid. art 22 [↑](#footnote-ref-12)
12. Jagmohan Singh v. State of U.P., AIR 1973 SC 947 [↑](#footnote-ref-13)
13. Rattiram v. State of M.P., (2012) 4 SCC 516 [↑](#footnote-ref-14)
14. The Constitution Of India 1950, art 20(3) [↑](#footnote-ref-15)
15. D.K. Basu v. State of W.B., (1997) 1 SCC 416. [↑](#footnote-ref-16)
16. Jeeja Ghosh v. Union of India, (2016) 7 SCC 761 [↑](#footnote-ref-17)
17. Sunil Batra v. Delhi Administration, AIR 1980 SC 1579 [↑](#footnote-ref-18)
18. Prem Shankar Shukla v. Delhi Administration, AIR 1980 SC 1535. [↑](#footnote-ref-19)
19. People’s Union for Democratic Rights v. Union of India, AIR 1982 SC 1473. [↑](#footnote-ref-20)
20. Rudal Shah v. State of Bihar, AIR 1983 SC 1086; Bhim Singh v. State of J & K, (1985) 4 SCC 677. [↑](#footnote-ref-21)
21. BandhuaMuktiMorcha v. Union of India, AIR 1984 SC 802 [↑](#footnote-ref-22)
22. The Constitution of India 1950, art 19 [↑](#footnote-ref-23)
23. Ibid.art 20(2) [↑](#footnote-ref-24)
24. P.M. Bakshi, The Constitution of India 79 (Universal Law Publishing, New Delhi, 14th ed., 2017). [↑](#footnote-ref-25)
25. The Prisons Act 1894, s 4 [↑](#footnote-ref-26)
26. Ibid. s 7 [↑](#footnote-ref-27)
27. Ibid. s 24(2) [↑](#footnote-ref-28)
28. Ibid. s 27 [↑](#footnote-ref-29)
29. Ibid. s 26A (1) [↑](#footnote-ref-30)
30. Ibid. s 26A (2) [↑](#footnote-ref-31)
31. Ibid. s 58E [↑](#footnote-ref-32)
32. Prisoners’ Rights,Human Rights Law Network, <https://hrln.org/initiative/prisoners-rights-initiative>accessed on 17 July 2020 [↑](#footnote-ref-33)
33. National Consultation on Prison Legal Aid, Human Rights Law Network (20 Apr 2013) <https://hrln.org/litigation/national-consultation-on-prison-legal-aid> accessed on 18 July 2020 [↑](#footnote-ref-34)
34. (1994) 4 SCC 260 [↑](#footnote-ref-35)
35. (1997) 2 SCC 642 [↑](#footnote-ref-36)
36. Vivek Narayan Sharma, ’Prisoners’ Rights in India’( *The Times of India, 20 October 2018)*<https://timesofindia.indiatimes.com/blogs/lawtics/prisoners-rights-in-india/>accessed on 18 July 2020 [↑](#footnote-ref-37)
37. AIR 1983 SC 361 [↑](#footnote-ref-38)
38. AIR 1982 SC 1473 [↑](#footnote-ref-39)
39. AIR 1978 SC 1675 [↑](#footnote-ref-40)
40. The Universal Declaration of Human Rights 1948, art 9 [↑](#footnote-ref-41)
41. Ibid. art 11. [↑](#footnote-ref-42)
42. The International Covenant on Civil and Political Rights 1976, art 6(1) [↑](#footnote-ref-43)
43. The International Covenant on Civil and Political Rights, art 10, para 1. [↑](#footnote-ref-44)
44. Ibid. art 10, para 2(a) [↑](#footnote-ref-45)
45. Ibid. art 10, para 2(b). [↑](#footnote-ref-46)
46. Ibid. Rule 30. [↑](#footnote-ref-47)
47. Ibid. Rule 31. [↑](#footnote-ref-48)
48. U.N. General Assembly, The International Covenant on Economic, Social and Cultural Rights, 1966, Res. 2200. Sess. 23, U.N. Document A/RES/2200XXI<https://www.ohchr.org/Documents/ProfessionalInterest/cescr.pdf> accessed on 18 July 2020 [↑](#footnote-ref-49)
49. The Declaration on Protection from Torture, 1975, art 2-3 [↑](#footnote-ref-50)
50. U.N. General Assembly, Convention against Torture and other Cruel, Inhuman or Degrading Treatment, Res 39/46 (1984),  UN Document A/RES/39/46 <https://redress.org/wp-content/uploads/2018/10/REDRESS-Guide-to-UNCAT-2018.pdf> accessed on 19 July 2020 [↑](#footnote-ref-51)