Causes and Consequences of Overcrowding of Women Inmates in Prisons: A Case Study of Prisons in Khyber Pakhtunkhwa Province

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Abstract

This study explores the causes and consequences of overcrowding of women prisoners in jails. For this purpose, an attempt is made to investigate the issue of overcrowding in prisons. An in-depth interview for exploring these areas was developed and validated. Data were collected from 30 women prisoners and personnel of jail. Analysis of data has revealed that jails have an excessive number of prisoners beyond authorized capacity. Deficiency of area and persistent movement of a high number of women prisoners in and out is a major problem. Due to little space, they keep the food items under their cots and sleep above. Moreover, they sleep with one another in the same cot. The availability of few washrooms with broken doors has made the situation worse because persons using the washroom can be seen by outsiders. Mixed accommodation of under-trial women prisoners and convicted besides juveniles and adolescents with adults is unethical and is a serious violation of the rules. The study recommends that prisoners may be categorized according to their level of risk. To reduce their idleness, opportunities for exercise and sports may be increased. An alternative community-based punishment rather than prison for non-dangerous offenders may be followed. Training for using the available facilities efficiently may be arranged for all concerned.

Keywords: Women inmates, adverse overcrowding, judicial model

Introduction

The situation of jail for women is atrocious, abominable, and horrible. According to Report No.80, Law & Justice Commission of Pakistan (2018), the jails in Pakistan have roundabout eighty percent female prisoners who are under trial. They usually remain in jail for numerous days because neither they are communicated properly regarding the time of their trial or bail, nor they are capable to arrange the guaranteed bond to abate from the jail. Even the Judiciary fails to take the cases of women prisoners on a paramount eminence (Bhuta & Akbar, 2012).

The annual report of the Human Rights Commission of Pakistan (2020) while completely picturing the unfortunate situation of human rights, indicated

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several problems and issues like overpopulation, contaminated food, non-existence of proper healthcare structure, sexual abuse, brutality, and cruelty, etc.

These are the problems of prisons in Pakistan since their inception. Till now, none of the governments in Pakistan ever has made any serious effort to reform the prison rules. Pakistan has ratified UNCAT (2008) and CEDAW (1996), according to which it is the obligation on the legislature of the state to amend its domestic laws on such a framework that eradication of torture, inhuman and cruel treatment, etc. towards its citizens either kept in the prisons or out of prisons, could be done efficiently. It is obligatory under various international covenants to provide and safeguard basic human rights, and to maintain the dignity and respect of the citizens as well as prisoners. Although there have been various reforms made in the jail manual PPR (1978) still the women prisoners are not properly facilitated as per the statutory obligations under Jail Manual (1978). In various situations and the visits of specific prisons during the period of research, the authors have observed personally the consequences of overcrowding on captives.

Undeniably, overcapacity is a progressively more extensive problem in the prisons of Pakistan. In addition, it is one of the grave humanitarian distresses, as it involuntarily creates poor quality of detention, like jam-packed adjustment, with inadequate breathing space, unhygienic conditions, etc. This problem also adversely affects the jail personnel to fulfill inmates’ necessities in terms of their living conditions within jails (David, 2009).

Overcapacity not only crushes down their self-esteem but also demoralizes their physical and mental health. It accumulates undue tension on jail personnel and it enhances the level of stress and clashes among inmates and jail management. It creates hardships for the jail management in sustaining law and order within the prison, which ultimately upshots the wellbeing of the captives and even for jail personnel especially in terms of administration. The Consequences are especially crucial for the males, females, and kids (Carson & Golinelli, 2013)

Objectives

The main objective of the study is to assess the general conditions of women inmates in prisons and to explore the consequences of “overcrowding in prisons” being faced particularly, by women prisoners and jail administration, and suggest measures for reduction of overcrowding.

Significance

There is hardly a few academic research conducted on ‘woman prisoners’ in Pakistan. The targeted population is one of the most abandoned and socially omitted groups which requires a serious struggle to fetch their circumstances,
sufferings, and problems in the public interest and pressurize the stakeholders to report. The findings of the study will continuously improve the guidance services in prisons. The shockingly high increase in current years in the number of females and adolescents in prison, and the affluent disparities in female detention levels, in different continents, should promptly pass-through genuine research processes across the countries to ponder upon the issue to minimize the strength of women prisoners in jails. Female incarceration requires a huge budget.

The matter of overcapacity in custodial institutions is multifaceted. An enormous number of commonly strengthening motives that may accelerate overburdening in jails, which differ unusually from one state to the other, as well as inside a country. The reasons for overpopulation in jails are not limited to the criminal justice system of any state but extend to other domains of state obligations, such as strategies on social well-being, health facilities, policies on schooling and employment, among nationals (French & Gendreau, 2006).

The impact of any research is roped, definitely on the theme of any study. It is more probable that stakeholders will pay no attention towards confirmation when it checks different characteristics of the criminal justice system to which they have to show more concern and in this respect, dependence on the growing imprisonment in the wellbeing of society emerged as one of the latest concerns of the stakeholders. However, the very task is usually achieved through experts’ opinions. In the modern era, as per the advice of experts, various states have established “family group conferencing” to deal with juveniles and “Specialist Koori Courts” to handle offenders by the co-operation of the local community, which of course are few good examples.

**Literature Review**

Consequences of overcrowding have typically been studied through the lens of three main theories: deprivation, importation, and situational models. The deprivation model is based on the work of French and Gendreau (2006), what they termed the “pains of imprisonment”. Further, they explained that the hardships of confinements, like the ban on liberty and free movement, solitude, and independence, etc., cause incarcerated persons to take steps out to satisfy the demands and via illegal attitude.

In criminological theory, the importation model of delinquency relates to the disobedience of prisoners in jails. This model creates distinction amongst prisoners behind the bars regarding their misbehavior, based on their previous criminal record and racial prospects that they carried into prisons. It segregates inmates based on their experiences in confinement, along with their misbehavior is categorized with their age and previous criminal record. Lastly, the situational
model purports that circumstantial aspects, like the occasions, during the days or months of a year or situational position of the jail, are the chief reasons for inmate misbehavior (Jiang & Fischer-Giordano, 2002).

This finding supports the contention that existing theories of inmate misconduct (e.g., deprivation, importation, and situational) influence one another and may also affect the odds of misconduct directly (Goodstein & Wright, 1989; Wooldredge, 2003). This finding supports the contention that existing theories of inmate misconduct (e.g., deprivation, importation, and situational) influence one another and may also affect the odds of misconduct directly (Goodstein & Wright, 1989; Wooldredge, 2003). Steiner and Wooldredge (2009) have explained how importation, deprivation, and administrative control theories can explain the deviant and violent behavior of incarcerated individuals. The author lamented various criminological theories to explain this phenomenon. Agnew’s general strain theory and social control theories are few of fame. It has been concluded that such criminological theories help explain untoward behavior. These theories hold that incarceration is ineffective in curbing the criminal tendencies of offenders. Literature explores the ways of forecasting misconduct and associated preventive measures.

According to the National Research Council (2014), the growth of incarceration in the United States has prompted numerous critiques and a growing body of scientific knowledge about what prompted the rise and what its consequences have been for the people imprisoned, their families, and communities, and for U.S. society. The findings of this study suggest that the number of prisoners in the United States has exceeded the limits and their high numbers can no longer justify the welfare benefits it conventionally brings. These numbers have crossed the breaking point and it in itself has become a reason for social impairment and denial of justice. All states endorse the need of making amendments in conviction policies, jail policies, and societal policies so that dependency on confinement in jails can be minimized. The study pinpoints the principal issues that need appropriate redress so a solid foundation can be laid down for the policy. This study report gauges the proofs with connection to public policy so that substantial discussion can be initiated to review and analyze the confinement policies.

The jails do not prioritize the rehabilitation of drug addicts. It is considered an extra operation that is outside the domain of prisons generally. It implies that if there are budgetary shortages, treatment of drug addicts can be excluded without any hesitation from operations conducted in jail. Moreover, the treatment of drug addicts is not even integrated into the primary objectives of the agenda of jails. This demotes the role of prisons to a place merely for the
confinement of offenders rather than their integration back into society. It’s a failure on part of the jail which is a very important component of the criminal justice system. Consequently, the risk is passed on to society in case the offender recidivism. Furthermore, eventually, other facilities are encumbered outside jails generating further pressure (Leukefeld & Tims, 1992).

The findings of Bales and Piquero (2012) point out that states which presently have or are considering the execution of determinate penalizing should scrutinize possible changes in strategies and practices to diminish the impact of reductions in convict incentives to stand by institutional rules. The deprivation model of misconduct explains the potential connection between prison overpopulation and prisoner infringement where the overpopulation adversely affects the prisoners’ privacy which ultimately results in disciplinary issues among the prisoners as well as jail administration. (Morris & Worrall, 2014)

The deprivation model emphasized that the crowding of jails can deprive prisoners of employment opportunities. The work opportunities are meager and in case of overcrowding, a large number of prisoners are deprived of work opportunities rendering them idle increasing boredom. Since they cannot be engaged in a constructive activity, they are can develop criminal and violent tendencies. Thus overcrowding is linked to the depravity of prisoners (Sykes, 1958). This mechanism notices that crowding creates the breeding ground for the misconduct of prisoners. It cannot be said with utmost certainty that crowding leads to misconduct if the environment generally creates opportunities for misconduct. The possibility is that crowding and deviance occur simultaneously. Moreover, crowding also affects the mental as well as physical stress upon prisoners creating psychosomatic malaises (Gaes, 1985).

Lawrence and Kathryn (2004) considered the effect of overcrowded jails while explaining antagonistic occurrences among prisoners, (like negative, harsh, and aggressive dealings of inmates) that results in hostile and malicious incidents. Therefore, overcrowding in prisons is allied with the acuteness of changed eventualities. In a shot, such a vicious occurrence also induces an offensive response in other individuals. Even when overcrowding is diminished, its impact is persistent on individuals (Huebner, 2003). The subliminal effect of prison congestion has a double impact on inmates that is instant misconduct and prolonged effects from changed circumstances that are not instantly tied to the jam-packed surroundings (Morris and Worrall, 2014).

**Methodology and Procedure**

Secrecy and obscurity are ethical practices considered to guard the privacy of human subjects while gathering, investigating, and recording data. Researchers
are expected to respect their participants. So Jail personnel and participants both were told that their information are only for research purposes and will be anonymous. Data was collected from 30 participants. Every effort has been made by the researcher to preserve participants’ confidentiality.

The Study is conducted mostly on the principle of Qualitative Research. Data was compiled through the application of interview protocol from women prisoners of different central prisons of Khyber Pakhtunkhwa. The author met directly with women prisoners within the jail area specified for them and conducted interviews with easily accessible inmates in the face-to-face meeting. A semi-structured interview was designed as a research instrument to identify the causes and consequences of overcrowding in prisons. Interviews were conducted in Urdu, Pashto, and Hindko languages and later on translated into English. Data obtained was then interpreted through narrative analysis technique to draw accurate findings. Interviews were also conducted from personnel of jails in direct meetings and through telephonic discussion from Former Director-General of National Academy Prison Administration, and deputy secretary Law and Justice Commission of Pakistan.

Additionally, the author was also relying on secondary sources and gathered data from related books, law journals, and articles, newspaper articles, law digests, magazines, reports of governmental, semi-governmental, and non-governmental organizations, etc.

Results and Discussion

The current research explored several hardships that are the reflection of women prisoners’ perception of the prevailing conditions during incarceration. This research also comes under the sphere of causes and consequences of overcrowding in prisons of KP with special reference to women inmates. The problem of inadequate medical facilities for women prisoners (mismanagement to administer patients) and hygiene in prisons, the problem of safety and security of prisoners, adverse impact on prison staff (pressure of workload, administrative and disciplinary issues), adverse impact on offenders (Overcrowding is likely to increase the risks of assaults and bullying between prisoners), few opportunities for positive regime activities, mismanagement of patient prisoners, accelerate amenities deficiency, hardships in designing to rehabilitative and recreational programs for women prisoners, capacity and space issue, prisons resources may not keep pace with increasing numbers and increase the level of prison staff, etc. are mentionable.

Insufficient space and continual movement of a huge number of women prisoners in and out of the prisons have been indicated as the key problem.
Overpopulation is the commonly observed fact in cases where the need for the accommodation of prisoners surpassed the available and most importantly authorized space in prisons. The jails throughout Pakistan are overpopulated (Table no.1). The inmates in the prisons of KPK also exceed beyond the capacity authorized (Table no.2). In one of the prisons of PK, the capacity of accommodation is 34 prisoners, but 101 women prisoners are accommodated along with their 19 children. Due to overpopulation in the same prison, many difficulties were being faced by the prisoners. One of the women revealed: “we keep our food (vegetables, fruits, and other eatables) under our beds and sleepover them with one another on one bed.” Other issues also arise due to overpopulation of inmates beyond the authorized capacity e.g., skin diseases. Most of the women prisoners in various prisons of KP have been found suffering from dermatitis and eczema etc. one women prisoner told: “one of the common and dirtiest diseases regarding skin suffered by the inmates is skin itching. The women at most of the time are found itching. Though they are provided with itching ointments and creams, they don’t use it according to the prescription. Even if they use those ointments, they don’t have the chance to take the shower within proper time because they have to wait for their turns to come due to lack of bathroom facilities and such wait sometimes extend up to four days.”

**Table.1 The Numeral record of accommodated prisoners and authorized capacity of different districts of KP:**

<table>
<thead>
<tr>
<th>District</th>
<th>No. of Female Prisoners</th>
<th>No. of Juvenile Prisoners</th>
<th>No. of Male Prisoners</th>
<th>Prison Population</th>
<th>Authorized Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>District no.1</td>
<td>07</td>
<td>01</td>
<td>505</td>
<td>513</td>
<td>485</td>
</tr>
<tr>
<td>District no.2</td>
<td>33</td>
<td>NIL</td>
<td>1886</td>
<td>1919</td>
<td>1590</td>
</tr>
<tr>
<td>District no.3</td>
<td>48</td>
<td>NIL</td>
<td>2069</td>
<td>2117</td>
<td>1200</td>
</tr>
<tr>
<td>Total</td>
<td>88</td>
<td>01</td>
<td>4460</td>
<td>4551</td>
<td>3275</td>
</tr>
</tbody>
</table>

Source: (the official record of each prison)
Table 2: The Numeral record of inmates in different jails and prisons

<table>
<thead>
<tr>
<th>Sr.no</th>
<th>Specific provinces</th>
<th>Authorized accommodation</th>
<th>Accommodated prisoners</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Punjab</td>
<td>26045</td>
<td>50637</td>
</tr>
<tr>
<td>2</td>
<td>Sindh</td>
<td>12416</td>
<td>19589</td>
</tr>
<tr>
<td>3</td>
<td>Khyber Pakhtunkwa</td>
<td>7707</td>
<td>10245</td>
</tr>
<tr>
<td>4</td>
<td>Baluchistan</td>
<td>2585</td>
<td>2685</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>48753</td>
<td>83156</td>
</tr>
</tbody>
</table>

Source: Law and Justice Commission of Pakistan

Women prisoners while waiting for their turns either for washroom or toilet often quarrel with each other and jail administration has to face difficulties to discipline them, as two toilets and four 6. Washrooms are deficient for their requirements. Often they struggled, as stated by another female inmate that “There are many difficulties in lockup, but the matter of using bathrooms is actually on top. Merely two bathrooms are open due to which most of the time, we fight to get a chance.” Besides this, washrooms were having broken doors and while using see-through. The area specified for bathrooms was damaged and was not appropriate to protect the solitude while attending.

It is indicated under Rule 309 of Pakistan Prison Rules 1978 that the women inmates who are under trial must be accommodated separately from the convicted prisoners, juveniles from the adults, inveterate and habitual from the intermittent and casual offenders and superior class prisoners both under trial and convicted, if possible, from ordinary prisoners. But unfortunately, there exists no assortment of women prisoners based on the above-mentioned categories in the prisons of KP. Such mixed containment of female prisoners in all categories is another issue that adversely affects them. One of the women prisoners said: “the prison staff never understand our problems. There was a very young girl who was imprisoned with me. We were both placed with a woman who was a chain smoker. I asked the madam multiple times to move us to another place, but she never accepted my request. At her company, the girl also started smoking.” When the scholar asked about this from the senior lady assistant superintendent during the interview, she said, “You will be surprised, but here is the very important fact that the relevant rule 309 was never applied in the women section of any jail of KP.”
Due to the limited space and the overcrowding of prisons, we had to adapt them according to the available space in women sections.” The admission of prisoners is more as compared to release.

In accordance to rule 231 of Pakistan Prison Rules 1978, the under-trial inmates shall be kept separately from the convicted inmates, but the scenario is contrary in all the prisons of KP, where both are kept together in the same barracks. The reason behind keeping the accused prisoners separately from the convicted ones is that the former could not be treated the same as the latter because it is the basic principle that the accused is presumed to be innocent until proven guilty. Along with that, such mixed accommodation of prisoners put a huge burden over the jail staff resulting in the disruption in the smooth running of prison affairs. For example, the under-trial prisoners are not prohibited from the movement, and they go to the courts to face their trials under police custody, from which they may get the opportunities of illegal transportation of goods and it is quite obvious that they make good terms with the jail and police officials. Furthermore, no restriction or ban can be imposed on the conversation between various categories of inmates because all reside in the same prison. So, it is obvious that keeping all these categories of prisoners together is not a safe practice. As compared to adult female prisoners, the young or juvenile female prisoners have less mental maturity, level of understanding, and exposure to the practical world due to which they are more exposed to be trapped. In addition to that, the younger inmates have more tendencies to adopt the worst things happening around them as their level of differentiating between right and wrong is not so developed. Consequently, the basic role of prison which is rehabilitative for such inmates turns out to be destructive.

Overcrowding in jails ultimately affects medical facilities for prisoners. Patient prisoners were found in the very worst conditions during incarceration. According to Rules 787 and 788 of Pakistan Prison Rules, 1978 inside hospitals in all custodial institutions must be well furnished to handle the health requirements of sick inmates but the real situation is not the same. An excessive number of women prisoners put constant pressure on prison staff which results in mismanagement to administer patients to prisoners. Various responses of the women prisoners explored the inadequate medical facilities for them as a serious issue especially for diabetic patients and patients having hepatitis or problem of high blood pressure. Diabetic patients were really in very critical conditions. Diabetic patients, no doubt require proper treatment and care as compared to other inmates. One of the medical aspects regarding them is that if they are not provided food at the proper time, they get “hypoglycemia” because of the anti-diabetic medicines. Such a situation is numerously reported by various women
from different jails in KP. One of the women prisoners said “I am a diabetic patient. The medication I have been put upon by the doctor is not that good. I feel hunger and unconsciousness most of the time.” Another woman of one of the other prisons in KP told “one of the women among us was suffering from hepatitis and felt severe kind of pain most of the time due to such illness. But unfortunately, the behavior of doctors during her treatment or checkup was very harsh and inhuman. The doctor would be called again and again every time she felt pain but she wasn’t given proper attention by the doctor and was always treated badly. If she was given the slightest of attention, she would have lived today. She was prescribed an ultrasound by the doctor but was never taken to have one. Ultimately, she died waiting that maybe someday, someone would take her for an ultrasound. If someone would have taken her for an ultrasound, she would have been at least satisfied that her treatment is ongoing. She died hopelessly.”

Overpopulation in prisons also leads to a deficiency of amenities. Although rules 317(i) and (ii) focuses on the provision of different amenities gross violation has been seen in almost all the prisons of KP. Except for a mat and blanket, no amenity is given to women prisoners. This was also reflected by the response given by the women prisoners that they were not provided with any amenities in the first place and if they were, fortunate, these amenities were either substandard or too late from the day they were put in the jail. A women prisoner talking about this matter said “only one mat was given when were first prisoned. We were provided with a mattress after 3 months and now we are given a charpoy (bed). The cups and glass we use are made by cutting the plastic bottles of soft drinks.” So it shows that women prisoners are not given proper care after they have been locked up in prisons. The scarcity of amenities, especially the soap greatly affects their hygiene resulting in skin diseases like itches and scabies, etc. Consequently, creating problems for women prisoners who are financially weak and poor and unable to afford these items.

One of the jail officials said: “to supply of amenities as per rule is extremely impossible for us. Admission of women prisoners is high as compared to their discharge and we have to adjust their needs within limited resources.” Response of the official is evident that the stakeholders have never an appropriate strategy or policy to shrink the difficulties of women prisoners.

Lack of space and overpopulation is some of the barriers on the road of recreational and rehabilitative aspects of prisons. Rehabilitation, in the context of Criminal justice, means the idea of assisting the criminals to become law-abiding and beneficial citizens of the society lead a peaceful life way from criminal tendencies (Wright, 1991). One of the superintendents of prison while talking
about this issue said: “the counseling of the prisoners, rehabilitation, physiological training, skill development, education, recreational activities, and vocational training had been provided by different NGOs to the women prisoners in past but all this ended now due to gross misconduct, misuse and exploitation and yet no steps have been taken to restart these programs in any prison by the government.” The statement of such a responsible officer reflects that the authorities have no concern or seriousness towards the rehabilitation of women prisoners and making them a useful part of society. One other woman prisoner stated that “I do normal routine activities in prison, like doing my daughter’s and my laundry, maintaining chakki and playing Luddo with fellow prisoners. Other women said “I spend my day by farming my vegetables for daily use and sewing the clothes of my fellow inmates. In the meantime when we get bored, we usually sing tappay (folk songs) together.

During the visit of the researcher at jails and prisons in KP, though most of the women in the prisons were found to be spending their time at leisure and gossiping around, it was also observed that few of them also had certain handicraft skills with them and they were found eager to show their stuff to the researchers for selling their items.

Few handicrafts by women prisoners in different jails/prisons of KP

No doubt, the handicrafts are substantial proof of the skills and potentials of women prisoners but unfortunately, these skills and potentials are also caged due to overcrowding, lack of space, and short budget of prisons. According to Rule 312 of Pakistan Prison Rules, 1978 Employments of rehabilitative jobs and recreational activities are very helpful to maintain the mental health of women prisoners by keeping them busy and at the same time enable them to live normal lives after release.
Jails throughout the KP Province have far more prisoners than they can accommodate; for instance, members of a Senate Committee visited central jail Karachi and brought to light that 6,500 prisoners were retained in the facility designed for 2,400 prisoners. One statistic was essentially terrible, that only 1,000 of the prison’s inmates were truly convicted for their offenses, along with the others under trial accused. This cleave overpopulation creates several problems, the main issue being that those imprisoned for minor offenses are often in close immediacy to toughen, dangerous criminals (Prisons Conditions, 2016).

Recommendations

On the basis of study findings, it is recommended that there is a need for new buildings, to be constructed. If there is a lack of funding, the government may approach the private sector to rent the building at proper locations. Laws related to parole must be relaxed and authorities of prisons may be given discretionary power to release prisoners on parole. Shortage of lawyers affecting all aspects of our justice system, including overcrowding in prisons adversely; government needs to provide sufficient numbers of lawyers that cases may be decided quickly. Similarly, for treatment purposes, medical facilities may be made available, if possible separate dispensaries with trained medical officers may be constructed adjacent to prisons. Similarly, to avoid tension and anxiety, entertainment opportunities for women prisoners may be increased. There must be a display area in prisons for exhibiting the handicrafts prepared by women prisoners. The government needs to allocate additional grants for the prison department so that the women prisoners may reward the vital necessities. Research scholars may be encouraged to write about, how to reform prisons. All woman prisoners must be handled with reverence, due to their worth as dignified personage.

Conclusions

It is concluded that all prisons of KP have an excessive number of women prisoners, beyond authorized capacity. The constant movement of the high number of women prisoners in and out is explored as a major problem. A considerable number of prisoners cannot afford the expenses of hiring lawyers to precede cases. Prisons lack medical facilities, recreation activities, and display centers for the crafts made by women prisoners. Moreover, women prisoners did have not sufficient amenities and latrines and were accommodated without categorization. A mixture of juveniles and adolescents with adults and under trials with convicts is unethical and a serious violation of the rules. There is a need to follow the practice of release on parole and trials. The basic need and necessities of women prisoners as a whole are not well administered by the jail administrations. Infect
the root cause of explored multiple problems is overcrowding beyond of jails’ authorized capacities.

References
Law & Justice commission of Pakistan Islamabad


United Nations Commission against Torture (UNCAT, 2008),
https://opil.ouplaw.com/view/10.1093/law:ihrl-3353uncomtocat08

United Nations Commission against Torture (UNCAT, 2008),
https://opil.ouplaw.com/view/10.1093/law:ihrl-3353uncomtocat08