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A Critical Analysis on Human Rights Violations and Prisoners Torture in Bangladesh

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ABSTRACT

In recent years, international human rights organizations, including Amnesty International and Human Rights Watch, have called on the Bangladesh government to take stronger action to address these issues. They have also urged the international community to increase pressure on the government to ensure that human rights are respected and protected. Human rights violations and prisoner torture remain significant challenges in Bangladesh. The government must take urgent steps to address these abuses, including holding perpetrators accountable and ensuring that prisoners are treated with dignity and respect. The international community must also continue to press for change and hold the government accountable for its human rights obligations.

I. INTRODUCTION

Torture, whether physical or psychological, is a growing issue. After World War 2, violence anticipated several forms within states. These violations against human rights triggered significant global outrage. Due to the limited definition of democracy, there is no connection. Numerous international instruments, such as the Universal Declaration of Human Rights, the Convention against Torture and Other Cruel, the International Covenant on Civil and Political Rights, Inhuman or Degrading Treatment or Punishment, etc., recognize the significance of prohibiting torture under all circumstances. This overwhelmingly establishes that the prohibition of torture is a fundamental human right, and that the signatory states have a responsibility to abolish this practice. Torture is still used often in the criminal courts of Bangladesh, a gross clear breach of humanitarian law. This paper examines Bangladesh's present remand regulations, practices, and safeguards. The primary objective of remand is to complete the investigation that the investigating body was unable to complete within the allotted period. In practice, however, remand is issued to torture the accused individual. The police are supposed to enforce the rights of the people in the country, yet it appears that they are infringing on the freedoms of the detainees in some way. Torturing a suspect, who is inferred innocent

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even before being found guilty by a jury of law, is a clear breach of human rights.² Torturing an arrestee on the basis of mere allegations should be strictly prohibited in the modern era. However, torturing the detainee is one of the most common police practices in Bangladesh. The practice of torturing innocent individuals is not new, and it has been prevalent in Bangladesh since the country's independence. Bangladesh has ratified the 1984 Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment, which ascribe certain duties on its estates in order to abolish torture. The Torture and Custodial Death (Prevention) Act was passed by Bangladesh in 2013, although it does not reflect the provisions of the Torture Convention. Furthermore, effective detention guidelines stated by the Supreme Court of Bangladesh are not adequately applied. Torture in the custody police occurs for different causes, including political influence, the personal rage of a police officer, and theoretical legal error, among others. In this research paper, chapter I explains The Idea of Violence in Prison. Moreover, chapter II describes the Bangladesh's National Laws Regarding Custodial Violence on Bangladesh's constitutional protection against torture, International charter to protect human rights against Torture, The Torture and Custodial Death (Prevention) Act, 2013 and Guidelines and regulations on Remand issued by the Supreme Court. Furthermore, chapter III focuses on the Female prisoners who are the victims of physical violence in custody and the legislative framework of safeguarding women in custody in Bangladesh.

II. VIOLENCE IN PRISON IN BANGLADESH

Although the definition of torture and its adoption in other international law are still unanswered issues, most international dispositions and bodies generally agree on four constituent parts of torture, which are also explained as "part of the definition".³ Torture is the malicious destruction of severe physical or mental torment as a means of moral imperative, punishment or pure cruelty. Torture has been used for investigation, cross examination, punishment and coerced and across history in a variety of forms. Torture can be conducted for the amusement of the torturer as well as for the purposes comparable to those of legislature torture by individuals. In *Aksoy v. Turkey*, the court discussed torture as follows: "If a person is taken into police custody in good health and is found damaged at the time of release, and if the treatment inflicted on the arrestee is purposeful, severe, and cruel, it will be considered torture."⁴ The UN Torture Convention ascertained torture as "any act by which severe pain or suffering, whether physical

² Dr CR Abrar, 'How long will we ignore what's happening in police custody?' *The Daily Star* (Bangladesh, 24 august 2022)

³ Kidus Meskele, 'Interpretation of torture in the light of the practice and jurisprudence of international bodies' [2011] PL 2

⁴ *Aksoy v. Turkey* [1997] Eur. H.R. Rep. 553

or mental, is intentionally inflicted on a person for such purposes as obtaining from him or a third person, information or a confession, punishing him for an act he or a third person has committed or is suspected of committing, or intimidating or coercing him or a third person, or for any reason based on discrimination of any kind, when such pain or suffering is It does not include pain or suffering caused only by, inherent to, or incidental to authorized punishments.⁵ International law and the domestic legislation of the majority of countries in the twenty-first century ban torture. Article 5 of the United Nations' Universal Declaration of Human Rights deems it a breach of human rights and deems it unacceptable.⁶

International law and the domestic legislation of the majority of countries in the twenty-first century ban torture. Article 5 of the United Nations' Universal Declaration of Human Rights deems it a breach of human rights and deems it unacceptable signatories of the Third Geneva Convention and Fourth Geneva Convention publicly pledge not to torture detainees in armed conflicts.⁷ The United Nations Convention against Torture, which has been adopted by 147 countries, also prohibits torture.⁸ National and international legal restrictions against torture stem from a consensus that torture and related ill-treatment are both unethical and infeasible. Despite these international accords, groups that monitor human rights violations, such as Amnesty International and the International Rehabilitation Council for Torture Victims, report widespread use in many regions of the world. Amnesty International (AI) claims that at least 81 nations around the world currently engage in torture, with some doing so openly.⁹ The prohibition of torture is incorporated in numerous international and regional human rights instruments.¹⁰

III. NATIONAL LAWS REGARDING CUSTODIAL VIOLENCE

(A) Constitutional regulations against Torture

As the supreme legislation of Bangladesh, the Constitution includes protections against torture and other inhuman activities. It states that no action shall be conducted contrary to the law that is injurious to the life, liberty, body, reputation, or property of any individual.¹¹ No one shall be deprived of life or liberty unless in accordance with the law. Under the heading 'Protection

⁵ UN United Nations Treaty Collection 1948

⁶ Universal Declaration of Human Rights 1948, Art 5

⁷ UN United Nations Treaty Collection.

⁸ *ibid* 5

⁹ Amnesty International 2022

¹⁰ Dr CR Abrar, 'How long will we ignore what's happening in police custody?' *The Daily Star* (Bangladesh, 24 august 2022)

¹¹ Constitution of the People's Republic of Bangladesh 1972, Art 32

against arrest and detention,' the Constitution gives particular protections against arrest and custody. Article 33 stipulates that an individual cannot be held in custody without being notified of the reason for their detention.¹² He must be permitted to speak with an attorney of his choosing. The arrested individual must also appear before the nearest magistrate within twenty-four hours of their arrest.¹³ Another Article states that no individual accused of a crime shall be required to testify against himself.¹⁴ No one shall be subjected to torture or cruel, inhuman, or degrading punishment or treatment, according to the same article.¹⁵ Furthermore, Article 7 of the Constitution affirms its own supremacy, stating that the Constitution is the ultimate law of the land and that any other law that conflicts with it is null and void.¹⁶

(B) International charter to protect human rights against Torture

In addition to domestic protections, regional and international safeguards exist to protect the rights of the accused against torture, cruel, and degrading treatment. Article 5 of the Universal Declaration of Human Rights states, "No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment". Article 7 of the International Covenant on Civil and Political Rights (ICCPR)1966 addresses the rights of the accused using the same terminology as article 5 of the Universal Declaration of Human Rights (UDHR). Article XXV of the American Declaration of the Rights and Duties of Man (ADRDM), 1948 declares that every individual deprived of his liberty has the right to humane treatment while in captivity. Article 5 of the African Charter on Human and Peoples' Rights, 1986 prohibits any types of exploitation and debasement of the human person, including torture and other cruel, inhuman, or humiliating punishments or treatments.¹⁷ United Nations Convention against Torture and Other Cruel, Inhuman, or Demeaning Torture represents one of the most significant international documents (hereinafter, the UN Torture Convention).¹⁸ The main purpose of the UN Convention against Torture is to abolish torture and such other ill-treatment. Among 171 state parties as of June 2021, it is one of the most generally ratified conventions. Bangladesh joined the Convention on October 5, 1998.¹⁹ Therefore, this treaty is one of the safeguards for Bangladeshi citizens against torture. The state party to the Convention is required by law to comply with its rules and

¹² Constitution of the People's Republic of Bangladesh 1972, art 33

¹³ Ibid 11

¹⁴ Constitution of the People's Republic of Bangladesh 1972, art 35(4)

¹⁵ Ibid 13

¹⁶ Constitution of the People's Republic of Bangladesh 1972, art 7

¹⁷ African Charter on Human and Peoples' Rights 1986, art 5

¹⁸ Article 1 of UN Torture Convention.

¹⁹ Ibid 17

regulations.

In addition to the definition of torture in Article 1 of the Convention, it is the responsibility of the State party to prevent other acts of cruel, inhuman or degrading treatment or punishment committed by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity.²⁰

As the State Party of the UN Torture Convention, Bangladesh needs to comply with the provisions of the Convention.

(C) The Torture and Custodial Death (Prevention) Act, 2013

The Constitutional protections and the Supreme Court's orders and recommendations regarding the torture and other ill treatment are not consistently observed and, therefore, left largely impotent. The cases of torture and death in the police custody are taking place in regular basis. To remedy these violations, the human rights organizations and civil society members have sought the implementation of a comprehensive law. The need of establishing a law criminalizing all acts of torture has also been raised by the Committee Against Torture (CAT) as Bangladesh's commitment. Subsequently, the parliament of Bangladesh enacted the Torture and Custodial Death (Prevention) Act, 2013 on 27 October 2013. The Act 2013 includes definition of "torture" and "custodial death" and defines the process for making a complaint, the investigation, and sentencing provisions as well. According to section 2(6) of the Act, "Torment" means any physical or psychological torture that hurts. It has also established some more precise requirements of "torture" like extorting any information or confession, punishing or intimidating any suspected person or offender, or any work done on a discriminating basis etc.²¹ According to section 2(7), "Custodial Death" means the death of a person in the care of a public officer. Custodial death will also entail any death of any individual during an illegal detention, or a death during an arrest or questioning.²²

According to section 5(5) of the Act, the inquiry would be undertaken by a police officer chosen by the court whose rank is not less than that of the person charged.²³

Under section 5(2) of the Act, the court can order a judicial investigation if an aggrieved party, such as the victim of torture, asserts that the police cannot conduct a proper investigation due to neutrality concerns.²⁴ Regarding punishment, the Act has a number of clauses. If any act of

²⁰ United Nations Treaty Collection: Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment 1984, art 1

²¹ Torture and Custodial Death (Prevention) Act 2013, s 2(6)

²² Torture and Custodial Death (Prevention) Act 2013, s 2(7)

²³ Torture and Custodial Death (Prevention) Act 2013, s 5(5)

²⁴ Torture and Custodial Death (Prevention) Act 2013, s 5(2)

torture is committed, the offender faces a minimum of five years in prison or a minimum of fifty thousand Taka in fines, or both. If any act of custodial death is committed, the offender faces a minimum of life in prison or a minimum of one hundred thousand Taka in fines, or both. In both instances, the guilty individual will pay the victim or aggrieved party an additional minimum of twenty-five thousand and two hundred thousand Taka, respectively.²⁵

(D) Guidelines and regulations on Remand issued by the Honorable Supreme Court of Bangladesh

Bangladesh Legal Aid and Services Trust (BLAST), a non-governmental organization, and other human rights groups filed a writ lawsuit with the Supreme Court of Bangladesh to address allegations of power abuse, including death in prison, brutal treatment, and torture.²⁶ In that writ case, police misused arrest without a warrant under section 54 of the CrPC and remand in police custody under section 167. That writ petition alleged that law enforcement often exploited CrPC arrest without warrant and remand powers. They also claimed that the two clauses were confusing and gave law enforcement officials discretion. The petitioners claimed that the police violated constitutional rights by arresting and remanding without a warrant. The rights to life and liberty, equal protection of the law, lawful treatment, and freedom from harsh, inhuman, and degrading treatment and punishment were breached by Articles 27, 31-33 and 35 of the Constitution of Bangladesh.

The High Court Division of the Supreme Court ruled that sections 54 and 167 of the Code of Criminal Procedure of 1898 violated Bangladesh Constitution Articles 27, 30, 31, 32, 33, and 35.

Another High Court bench gave recommendations for the government, magistrates, and police on arbitrary arrest, imprisonment, remand investigation, and suspect treatment in *Saifuzzaman v. State and others*.²⁷

In *Saifuzzaman v. State and others*, student political activists were unlawfully arrested under section 54 of the Criminal Procedure Code of 1898 and imprisoned for judicial remand under the Special Powers Act of 1974.²⁸ The court emphasized the police's gross violation of citizens' fundamental rights. The High Court Division has always set remand and detention rules.

These decisions require arrestees to appear before the nearest magistrate within 24 hours. If the

²⁵ Torture and Custodial Death (Prevention) Act 2013, s 15

²⁶ Hasan m, Arifuzzaman, Md., and Rahaman, M. M., 'Torture in Lawful Custody: Violation of United Nations Convention against Torture in Criminal Justice System in Bangladesh' [2017] *Beijing Law Review*, 5, 49-61

²⁷ *Saifuzzaman vs. State* [2004] 56 DLR 324.

²⁸ *Ibid* 25

concerned police officer needs more time to conduct the investigation, he may request an extension of the arrested person's detention. In this case, the police officer must write a forwarding letter to the magistrate explaining why the investigation process occurs over 24 hours and why the complaint and information are trustworthy.²⁹ The court also ruled that forwarding a letter does not grant a detention extension. The police officer must also present the forwarding letter, memorandum of arrest, information and complaint, and diary to the Magistrate for an order under section 167 of the CrPC. The presiding magistrate may impose extended detention if the forwarding letter's allegations or information against the detained individuals are sufficient. Unless the Magistrate releases the inmate.³⁰

The magistrate will prosecute the police official who illegally detained the detainee under section 220 of the Bangladesh Penal Code after releasing him.³¹

If the Magistrate warrants further custody, the arrestee will be questioned in a room with a glass wall or grille with their attorney. The magistrate who authorizes interrogation must record the reasons.

If an unwarranted arrestee dies in police custody, the officer must notify the magistrate. Once notified, the magistrate will investigate the death of a person in police custody or jail. The official in charge must bring the arrestee before the magistrate after a protracted remand without a death. If the police officer cannot finish the investigation within 15 days (first extended period of imprisonment) under section 167(2) of the Code, the Magistrate may remand the accused under section 344 for a single 15-day term.

In 2016, the Supreme Court's High Court Division issued comprehensive directions for law enforcement to protect arrestees' constitutional rights.

(E) Current Custodial crime rate in Bangladesh:

The rate of custodial violence in Bangladesh is very high . Ain O Salis Kendra (Law and Arbitration Center), a Dhaka-based human rights organization, said that at least 58 people have died in police custody and 5400 injured over the country in last 9 months of the year 2022.³²

Table:

²⁹ Ibid 25

³⁰ Ibid 25

³¹ The Penal Code 1860, s 220

³² Hasan, Arifuzzaman & Rahaman, 'Torture in Lawful Custody: Violation of United Nations Convention against Torture in Criminal Justice System in Bangladesh' (2017) Beijing Law Review, 8, 397-422

Torture in Jail Custody	Torture in Police Custody	Both Jail and Police Custody	Total
4 (20%)	13 (65%)	3 (15%)	20 (100%)

33

This table demonstrates the proportion about the specific place of torture by investigator. Here Twenty detainees have been questioned, four of them were tortured while in jail custody, thirteen while in police custody, and three while in both jail and police custody.³⁴ According to the law, the custodian would be sentenced to life in prison for any death in custody, and the government must compensate the victims' families.

Nur Khan Liton, a human rights activist, stated that only 24 cases have been tracked and action taken against law enforcement agencies in the nearly ten years since the law was passed. People are too frightened. No one dares to file charges against law enforcement officials after being tortured.³⁵

Odhikar, a Dhaka-based rights group, estimates that approximately 4,000 people have been killed extrajudicially or while in custody in Bangladesh over the past two decades (Rights).³⁶

IV. FEMALE PRISONERS AS VICTIMS OF CUSTODIAL VIOLENCE

In Bangladesh, violence against women is one of the most intractable violations, endangering not only the physical and psychological health of women but also their self-respect and dignity. Among the different forms of violence against women, state-controlled detention by government enforcement agencies adds a new dimension, despite the absence of a formal word called safe custody in our domestic law. However, after so many years, the term "safe custody" is no longer safe for women and girl children, who have become victims of another crime within the walls of what is ostensibly their safest haven. Moreover, most of the time women victimize by gender-based violence while in custody.

(A) The legislative framework of safeguarding women in custody in Bangladesh

In Bangladesh, there are no statutes or legislation that specify the concept of safe custody for women, although magistrates frequently exercise their discretionary authority through various

³³ Ibid 31

³⁴ Ibid 31

³⁵ Talukdar Mahmud, 'On custodial violence' The Daily Star (Bangladesh, 18 February, 2014)

³⁶ Manila 'Torture on the occasion of International Day in Support of Victims of Torture' (Dhaka: Human Rights Organization Odhikar, 25 June 2022) <<https://odhikar.org/bangladesh-end-torture-and-ensure-justice-for-victims/>> accessed 17 November 2022

orders and decisions.

The word safe custody originally appeared in the section of the Criminal Procedure Code that deals with mentally ill individuals. According to section 466(2) of the CrPG, if an accused individual is deemed to be in an unsound condition, instead of granting bail, they should be committed to a location and in a manner determined by the court.³⁷

In addition, as per subsection 471(1) of the same statute, if an accused committed an offense owing to incapacity, they should also be placed in protective custody.³⁸

In all sections of the Criminal Procedure Code, however, there is no signal that could assure the protection of detained women, which could lead to a breach of the constitutionally guaranteed fundamental rights of women.³⁹

However, the term safe custody for women is given precedence in the *Nari O Shishu Nirjaton Domon Ain, 2000*, where section 31 states that during the trial, the Court may order the enforcement agency to keep the women in a government-designated shelter rather than a jail, if the Court deems it appropriate.

Due to the unwillingness of both the police and the magistrate, however, this provision is rarely and very rarely applied.

Although, according to the Penal Code of 1860, it is a criminal offense for any governmental body to unlawfully restrain and confine anyone, not just women.

Sections 354 and 355 of the Penal Code stipulate that punishment, a fine, or both will be imposed if an offense of outrage and dishonor was committed against any person, including women.⁴⁰

(B) Arbitrary detention

In Bangladesh, women who have been victims of a crime have suffered more during the judicial procedure and inquiry than the perpetrator. Women who are victims of domestic violence, rape, or prostitution are sometimes rescued by police but incarcerated as opposed to criminals.

The SPA of 1974 allows the government the jurisdiction to imprison anyone for up to six months without any type of judicial process in order to prevent them from committing a "prejudicial conduct," but the definition of this phrase is unclear⁴¹.

³⁷ Maksudul Islam, 'Safe Custody for Women: Institutional Violence in BANGLADESH' (2022)

³⁸ Ibid 36

³⁹ Ibid 36

⁴⁰ Ibid 36

⁴¹ Ibid 36

Section 54 of the Criminal Procedure Code is another section that is grossly misapplied by law enforcement agencies, as it contains the phrase "reasonable suspicion." According to that section, police can arrest anyone if they have reasonable suspicion that a crime has been or will be committed based on 9 specific grounds. However, there are no specific parameters for determining what constitutes reasonable suspicion and what does not.⁴²

Another law is the Bengal Vagrancy Act of 1943, which is frequently used against homeless girls and women, resulting in their temporary detention. It is particularly typical for girl children to be sent to juvenile detention as punishment despite being the victim of the crime. Girls are frequently apprehended by police for prostitution and sexually harassed during interrogation, despite the fact that they are the victim in this situation. There are preconceived notions among the magistrate that if the girl remains in detention, she may be released.⁴³

V. CONCLUSION

Human rights violations contradict democracy. Bangladeshis should not be tortured as democratic citizens. Bangladesh is a developing nation with socio-economic and legal insecurity. Absence of rule of law is one of the main causes of unrest and discipline. Also, Torture is illegal in Bangladesh, but victims have no remedies. Despite the concerns of the Committee against Torture and other human rights groups as well as members of civil society, no effective steps have been implemented to prevent torture. Torture is a disease that must be treated immediately or civilization will collapse.

Many effective methods can prevent police custody human rights violations. Protecting human rights requires a strong legal system. Governments must uphold the law. Torture punishment should be followed by Penal Code 1860. The Torture and Custodial Death (Prevention) Act 2013 should also incorporate the Torture Convention's definition of torture. Moreover, Bangladesh is a State party to the United Nations Convention against Torture, despite this, it does not adhere to the recommendations of the Committee against Torture and the Human Rights convention. Thus, the nation must follow those guidelines and report periodically.

Thus, law enforcement personnel must receive human rights training to prevent such violations. Political pressures prevent police from doing their duties. Human rights require political-free law enforcement agencies. Also, an independent torture authority is urgently required. That independent authority should have investigative powers like registering and investigating cases. Authorities should not be controlled. Media and NGOs cannot freely report torture. They lack

⁴² Ibid 36

⁴³ Ibid 36

the freedom to report all torture, which gives the offender broad authority to commit infringements of human rights. Finally, the State must follow all Supreme Court of Bangladesh remand guidelines.

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