

Current debates, development and challenges regarding enforced disappearance as torture

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Torture can be broadly defined as the intentional infliction of severe pain or suffering, by agents of the State, for a specific purpose, such as the extraction of information, a confession, intimidation or punishment or discrimination⁴. Other relevant elements not provided in the legal definition include the suppression of the will of the victim, powerlessness and the moral injury suffered, and the attack on dignity as

an essential human value. Similarly, enforced disappearance (ED) is, also broadly defined, the deprivation of liberty by agents of the State followed by the refusal to acknowledge the fate or whereabouts of the detainee, thus putting the person outside the protection of the law⁵.

ED is a composite human rights violation that involves two kinds of victims: first, the direct victim, who suffered the violence of abduction, the anguish of being held defenceless in an unknown place and who, in most cases, suffered physical or psychological torture, and, on the other hand, the relatives of the disappeared⁶. The level of anguish and suffering inflicted on family members has been repeatedly consid-

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4 In accordance with the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, “the term “torture” means any act by which severe pain or suffering, whether physical 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 having committed, 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 inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity. It does not include pain or suffering arising only from, inherent in or incidental to lawful sanctions” (article 1.1).

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- 5 Enforced disappearances are defined as “the arrest, detention, abduction or any other form of deprivation of liberty by agents of the State or by persons or groups of persons acting with the authorization, support or acquiescence of the State, followed by a refusal to acknowledge the deprivation of liberty or by concealment of the fate or whereabouts of the disappeared person, which place such a person outside the protection of the law”. See International Convention for the Protection of All Persons from Enforced Disappearance, article 2.
 - 6 Indeed, the ED Convention, provides that the term ‘victim’ means the disappeared person and any individual who has suffered harm as the direct result of an enforced disappearance”. In this sense, and as victims often recall, there are (a) the rights of the disappeared, including the right to due process, to liberty, security and integrity of the person, to be searched, reparation, etc. (b) the rights of the relatives to truth and justice, to measures of psycho-social assistance and other forms of reparation, etc.

ered by the medical and psychological community to be of sufficient severity to meet the threshold of the definition of torture (Citroni, 2017; Hollander, 2016; Kordon, D., Edelman, L., Lagos, D., & Kersner, 1998; Pérez-Sales, 2000; Robins, 2010; Shaery-Yazdi, 2020; Smid et al., 2020; Zarrugh, 2018).

There are strong arguments to consider that ED is a form of torture. Indeed, EDs always imply, towards the person disappeared, *intentionality, purpose, suffering, powerlessness, absolute deprivation of will and attacks to dignity*. At the same time, some of these elements may be more complex to prove in the case of relatives. One should recall, for example, that the German High Command, while implementing the sadly famous Night and Fog Decree, which instituted a program to enforcedly disappear victims in the occupied territories during World War II, expressly indicated that “[e]fficient and enduring intimidation can only be achieved either by capital punishment or by measures by which the relatives of the criminal and the population do not know the fate of the criminal. This aim is achieved when the criminal is transferred to Germany” (Finucane, 2010).

This paper explores these links (see also Nowack, 2012) and puts forward some proposals and challenges for the future.

Legal background: links between the ED Convention and the crime of torture

Since the Nuremberg Trials and the adoption of UN and OAS General Assembly Resolutions condemning the crime of enforced disappearances, many critical legal standards have been developed through judicial decisions, the adoption of international instruments (including the *Declaration on the Protection of all Persons from Enforced Disappearance* and *International Convention for the Protection of*

All Persons from Enforced Disappearance) and the creation of the entities responsible for supervising their implementation (including the UN Working Group on Enforced or Involuntary Disappearance (WGEID) and the Committee on Enforced Disappearances).

Enforced disappearances have, in certain instances, been recognised as a form of torture. Indeed, article 1(2) of the *Declaration on the Protection of all Persons from Enforced Disappearance* provides that “Any act of enforced disappearance places the persons subjected thereto outside the protection of the law and inflicts severe suffering on them and their families. It constitutes a violation of the rules of international law guaranteeing, *inter alia*, the right to recognition as a person before the law, the right to liberty and security of the person and the right not to be subjected to torture and other cruel, inhuman or degrading treatment or punishment. It also violates or constitutes a grave threat to the right to life.”

In its General comment on the right to the truth in relation to enforced disappearance, the Working Group on Enforced or Involuntary Disappearance (WGEID) indicated that “It also makes it clear that the right of the relatives to know the truth of the fate and whereabouts of the disappeared persons is an absolute right, not subject to any limitation or derogation. No legitimate aim, or exceptional circumstances, may be invoked by the State to restrict this right. This absolute character also results from the fact that the enforced disappearance causes «anguish and sorrow» (5th preambular paragraph of the *Declaration*) to the family, suffering that reaches the threshold of torture, as it also results from article 1§2 of the same *Declaration* [...] In this regard, the State cannot restrict the right to know the truth about the fate and the whereabouts of the disappeared as such restriction only adds to, and prolongs, the continuous torture inflicted upon the relatives.” (WGEID General Comment on the Right to Truth, para 4).

More recently, in its *Report on enforced disappearances in the context of Migration*, the Working Group further emphasised that “enforced disappearance is a crime which entails multiple human rights violations and constitutes in itself a form of torture or inhuman treatment, not only concerning the disappeared person but also to her/his relatives, because of the anxiety and anguish they suffer as a result of the disappearance of their loved one” (para 61).

In the first decision of an international human rights protection body dealing expressly with a case of enforced disappearance (Inter-American Court of Human Rights, *Velasquez Rodríguez v. Honduras*, 1988), the Court emphasised the purpose of stifling activities considered unlawful by means of a radical rupture of the internal juridical order referring to guarantees of liberty and personal security. The link with the prohibition of torture resulted not only from the purpose or end pursued through the removal of the person from any external control but also from the evidence that emerged from multiple testimonies: the main objective was and is to be able to interrogate the disappeared without limits as to the methods or duration of the practice. That is why, in most cases, the final fate of the victim is his or her physical elimination and the concealment of that fate and the whereabouts of his or her remains.

This was the first of different cases in which the Inter-American Court of Human Rights concluded that instances of enforced disappearances also constitute violations of the right to personal integrity and in certain circumstances torture (*Velasquez Rodríguez vs. Honduras*, para 156, 175, 187; *Gelman vs. Uruguay*, para 94-95; *Members of the Chichupac village and Communities of Rabinal vs. Guatemala*, para . 158; *Terrones Silva et al. vs. Peru*, para 172).

More specifically, regarding the effects of enforced disappearances on the abductees, the

Court indicated in the *Omeara Carrascal and others v. Colombia* case, that “the victims of this practice see their personal integrity violated in all its dimensions, and that the submission of detainees to official repressive bodies, state agents or individuals who act with their acquiescence or tolerance, that they practice torture and murder with impunity represents an infringement of the duty to prevent violations of the rights to personal integrity and life, even in the event that the acts of torture or deprivation of the life of the person cannot be proven in the specific case. Furthermore, this Court has held that forced disappearance is a violation of the right to personal integrity because the mere fact of prolonged isolation and coercive solitary confinement represents cruel and inhuman treatment” (para 194).

As for the effects of disappearances on relatives, the Tribunal considered, in the *Chitay Nech v. Guatemala* case, that “the denial of justice and the lack of knowledge of the whereabouts of [the abductee] that persist to date have given the alleged victims a new traumatic impact that has generated feelings of indignation, frustration, and even terror. The Tribunal observes that said experiences have impacted their social relationships, altered their family dynamic and their sense of belonging to an indigenous community, which has continued to cause suffering and fear. For that expressed, this Tribunal considers that the effects, both psychological as well as physical, suffered by the members of the [...] family, understood comprehensively in the complexity of the phenomenon of a forced disappearance, remain while the factors of verified impunity persist, which, at the same time, prevent the closure of the mourning process they have lived for many years.” (paras 225-226) Accordingly, the Court concluded to a violation of the right to the integrity of the relatives. This approach is also consistent with decisions of the Inter-American Court in the *Anzualdo Castro vs. Peru* case (para 113) and the *Trujillo-Oroza vs. Bolivia* case (para 114).

Along the same lines of the Inter-American Court, several international human rights protection bodies, including the United Nations Human Rights Committee (*Sharma vs. Nepal case*, para.7.9; *Maria del Carmen Almeida de Quinteros et al vs. Uruguay*, para. 14; *Mojica v. Dominican Republic*, para 5.7, General comment No. 36, para 58), the African Commission on Human and Peoples' Rights (*Mouvement Burkinabé des Droits de l'Homme et des Peuples vs. Burkina Faso*, para. 44), and the European Court of Human Rights (*Aslakhanova vs. Russia*, para. 133 and 215; *Varnava and Others v. Turkey*, para. 200; *Cyprus v. Turkey*, para. 155; *Tahsin Acar v. Turkey*, para. 238; *Umayevy v. Russia*, paras. 101–103; *Palić v. Bosnia and Herzegovina*, paras. 74–76) have recognised similar impacts on the right to the physical and moral integrity of the abductee and his or her relatives, constituting at least cruel, inhumane or degrading treatment in contexts of enforced disappearances.

More specifically, they have established the relationship between enforced disappearance and torture on the understanding that enforced disappearance facilitates and promotes the use of methods of physical torture of unusual cruelty in the context of interrogations. Furthermore, even if it is difficult to identify evidence of such torture, it is clear that the victim is subjected to forms of deprivation of liberty involving prolonged or indefinite solitary confinement without any contact with family members, lawyers or control officials. This isolation undoubtedly causes uncertainty and anxiety in the victim as to when and how it will end, resulting in mental or psychological pain or suffering of sufficient severity to qualify as torture under the definition contained in the Convention Against Torture.

The severe suffering criteria: medical and psychological evidence in relatives with close bonds

The suffering of the relatives of the disappeared is permanent and trans-generational. Its effects spread in the community and the whole society.

While suffering linked to torture is usually associated with physical pain, psychological torture cause enormous levels of suffering. Furthermore, in studies comparing the psychological or psychiatric consequences in victims of torture and relatives of the disappeared, more significant long-term impacts are observed in relatives both in terms of depression, symptoms of re-experiencing and avoidance and breakdown of fundamental beliefs about the world (Arnosó, 2010; Hollander, 2016; Lenferink et al., 2019; Pedersen et al., 2010; Phillips, 2011).

Table 1 summarises the multifaceted and complex ways in which ED produces individual, community and social suffering.

Short term

The psychological literature usually mentions the impossibility of dealing with the mourning process as a permanent wound for the relatives (table 2).

The individual and collective testimonials and first-voice accounts of the suffering of the relatives are endless. They show that the anguish at the beginning and, as time passes, the complex post-traumatic and grieving pain of the relatives victims also amounts, in most cases, to ill treatment or torture.

Recent developments and challenges

More recent legal substantive developments that may also interest the reader relate to enforced disappearances that occur in the context of migrations (Duhaime and Thibault, 2018; Nicolmann, 2021). Indeed, in

Table 1. Multifaceted and complex ways in which ED produces individual, community and social suffering

	Short-term impact	Long-term impact
Circumstances	<ul style="list-style-type: none"> • Direct trauma – Witnessing • Vicarious trauma - Imagining the disappearance 	<ul style="list-style-type: none"> • Post-Traumatic Stress Disorder (PTSD) • Complex PTSD
Threat - Fear	<ul style="list-style-type: none"> • -Demobilisation -Paralysing effect not only within the relatives but also the neighbourhood, community and society as a whole) (“He who does nothing, fears nothing”). • Privatisation of harm - Silence - Resignation and Skepticism • Political demobilisation - Rejection and disillusionment with ideologies of change or social struggles. 	<ul style="list-style-type: none"> • Social anomia • Submission
Denial of information	<ul style="list-style-type: none"> • Uncertainty • Despair • Lack of control - Helplessness 	<ul style="list-style-type: none"> • The pain and the refusal to use the word “mourning”, associated with the idea of accepting the hypothetical death. • Difficulty dealing with the grief of absence - Depression • Exhumations: lack of support, fear of not finding, the pain of remembering, facing stigma, scepticism regarding the possibility of justice...).
Identity and Dignity	<ul style="list-style-type: none"> • Questioning of social and political values • Humiliation and brokenness • Blame • Stigma and Shame 	<ul style="list-style-type: none"> • Inability to resume life, especially young mothers and adolescent children. Guilt for wanting an everyday life or for ending the search. • Permanent guilt for (a) events during the disappearance, (b) elements of the relationship at the time of disappearance, (c) survivor’s fault • Absence of moral reparation: theory of the two demons and other forms of blaming the victim.
Rupture of the Life Project	<ul style="list-style-type: none"> • Family collapse - Confrontations or accusations. Polarisation. • Emigration or exile (political or economic) • Loneliness and gaps in family dynamics • Economic breakdown • Suffering associated with traditional cultural dynamics (e.g. regarding the cultural role of <i>widows</i> or <i>half-widows</i>, obligations or duties towards in-laws and the possibility of losing offspring’s, the ownership of land or property). • Taking on new roles 	<ul style="list-style-type: none"> • Ambivalence between hope and despair • Ambivalence between rebuilding life and feeling betrayal • Ambivalence between talking about what happened or keeping quiet to protect - Covenants of Silence • Difficulties in seeking truth or justice • Trans-generational damage due to re-traumatisation, grief, silence or alteration of family dynamics (minimum detected up to 3rd generation).
Breakdown of life in relationship	<ul style="list-style-type: none"> • Community conflicts. Ambivalent self-protective stance of some communities 	<ul style="list-style-type: none"> • Rupture of the social fabric (“They turned their backs on us”)

Table 2. Mourning processes as a permanent wound.

Circumstances	Psychological processes
<ul style="list-style-type: none"> • Sudden, abrupt death. No preparation. • Truth. The person is not deceased but does <i>not exist</i>. It is not possible to know the truth, if it is known, it is difficult to prove it and if it is proved, it is difficult to make it public or denounce it. • While in some cases there may be graves and exhumations are a possibility, in others the bodies were made to disappear in the sea, rivers, incinerated etc (<i>double disappearance</i>). • Absence of rites. • Impact of rumours and fake news • Community members that believe it helps the person to encourage relatives always to maintain hope. 	<ul style="list-style-type: none"> • Limits to the expression of grief <ul style="list-style-type: none"> • Humiliation, Anger, Embarrassment. Stigma • Protecting other family members – Pacts of silence. • Danger of Reprisals in public expressions of mourning • Risk of being considered as an enemy (terrorist...) • Postponement by prioritising political activism and political struggle • Economic survival • Connection to the missing person <ul style="list-style-type: none"> • Life pending - Feelings of ambivalence or betrayal. The absent as a myth. • Disbelief - Denial of the possibility of death • Depression - Thoughts of reunion / suicide / death • Symbolic communication with the disappeared - Dreams - Premonitions

2017 the WGEID adopted an important *Report on Enforced or Involuntary Disappearances in the context of Migration* addressing the issues of migrations caused by ED, the disappearances of migrants for political reasons, during detention and deportations, or due to the actions of non-State actors, as well as factors which facilitate the disappearances of migrants. With regards to ED's relation to torture more specifically, the WGEID indicated that enforced disappearances should be considered as among the risks of torture to which States should consider their decisions on whether to remove a person in contexts of deportations and expulsions in conformity with the principle of *non-refoulement* (para 61). The report highlights important challenges in the field, for which solutions need to be further explored, including the measures that States need to adopt to assist relatives seeking, across borders, truth and justice regarding their loved one(s) disappeared abroad. Similarly, it invites the reader to assess in what circumstances "systematic situations of impunity regarding the abduction and detention of migrants by private actors, including

smugglers or traffickers, could be considered [...] as a form of acquiescence and, as such, constitute enforced disappearance" (para 42).

In addition, the UN Committee on ED and the Working Group have issued a series of recommendations dealing with specific standards, including the *Guiding principles for the search for disappeared persons* and the *Report on standards and public policies for an effective investigation of enforced disappearances*, two issues which are essential to ensure the rights of victims to truth and to justice, and to eradicate impunity. With regards to ED's relation to torture more specifically, the Committee has indicated that "Respect for the dignity of victims should be a guiding principle at every stage of the search for the disappeared person" (principle 1). Similarly, the WGEID reiterated that "[e]nforced disappearance can cause deep anguish, suffering and harm to victims and their relatives. Not knowing the whereabouts of a family member can amount to torture". (para 60). Both the WGEID and the CED should now address to operationalise the interrelation of the search and the criminal investigations. On this matter, the WGEID recommended that States "*Estab-*

lish clear mechanisms to ensure coordination, cooperation and exchange of information between all State agencies involved in the investigations, in particular those responsible for the criminal investigation and prosecution and for the search for disappeared persons, in order to guarantee that progress and results are achieved on all sides; Cooperate with other States, both during the search for disappeared persons and during criminal investigations, including by producing any relevant evidence in their possession, establishing cooperation frameworks focused on offering comprehensive assistance to the victims, surrendering or extraditing alleged perpetrators and ensuring their investigation and trial” (para 98 (m) and 98 (n)).

The recent commemoration of the 9/11 attacks have also reminded the international community of the importance of ensuring human rights in all contexts, even while fighting terrorism (UN Special Procedures Joint Study, 2010). The WGEID’s 2021 *Report on Enforced Disappearances in the Context of Transnational Transfers*, addresses instances and trends of enforced disappearances in such contexts, the types of human rights violations that then occur, and the impunity that results from such instances. More specifically, it recalled ‘that such practices can also facilitate the perpetration of torture and other cruel, inhuman or degrading treatment or punishment and can in itself constitute a form of such treatment under certain circumstances’ (para 59). This development will require further coordination with other Special Procedures, including the Special Rapporteur on the Promotion and Protection of Human Rights and Fundamental Freedoms while Countering Terrorism, the Special Rapporteur on Extrajudicial, Summary or Arbitrary Executions, the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Special Rapporteur on the Human Rights of Migrants and the Working Group on Arbitrary

Detention, so that States be held accountable for human rights violations occurring in this context and so that these practices never become normalised.

Finally, at the regional level, promising standards are being developed by the Working Group on Death Penalty, Extra-Judicial, Summary or Arbitrary Killings and Enforced Disappearances in Africa, created by the African Commission on Human and Peoples Rights, which should also address how enforced disappearances relate to torture, cruel, inhumane and degrading treatment. The African Commission should adopt guidelines swiftly and ensure their implementation and proper supervision within the region.

All of these elements are avenues to a contemporary interpretation and implementation that expand and deepen global protection against ED, and address broader challenges dealing with the conceptualisation of ED in specific contexts, with the operationalisation of prevention, search and investigation, and reparations, some of which are addressed in specific papers contained in the present volume.

In the psychosocial field there also new developments and challenges. Among them moving from the description of clinical elements to standards of good practice. Particularly relevant in this regard is the *International Consensus on Principles and Standards on Psychosocial Work in Forensic Search and Investigation Processes for Cases of Enforced Disappearances* (ECAP & GAC, 2009, 2017). The result of several years of work led by civil society organisations from Latin America and Asia establishes criteria for good practice in each of the phases of the search process, especially in the context of exhumations. As a derivative of this work, the *Standards of Good Practice for Psychosocial Accompaniment in the context of Involuntary Disappearance in Migration* have been developed in recent years.

Most of the theoretical reflections regarding psychiatric and psychological aspects has been linked to teams in Latin America during the 1980's and 1990's. The 11S terrorist attacks in US and political violence and collective catastrophes in Nepal, Sri Lanka and the South Cone of Africa have fuelled research in other cultural contexts incorporating a fascinating cross-cultural perspective that has enriched the debate. There is a lot of work ahead. There is a lack of studies, for instance, of the bereavement process and psychosocial support in cultures where there is a tradition of healing the dead that are suffering for not being found, or the particularities of cultures where the disappeared is part of the ancestors and remains active and present within family life through dreams and premonitions, just to mention two examples. There also challenges in better knowing in non-western contexts the dynamics between perpetrators and victims and the interplay between traditional healing and justice systems. The Argentinian and Chilean centres working with survivors, following previous research on Holocaust survivors have proposed that the impact of ED in relatives go as far as to the third generation (EATIP et al., 2002). There is recent research in other cultures showing different patterns (Dalgaard et al., 2019; Kaplan, 2013). More research is needed in understanding the different trans-generational impacts of ED and the links with torture. There is also very recent research adapting the available knowledge to other groups of relatives of missing persons that the WGED has recognised as victims of involuntary disappearance.

Truth and justice are often seen as unsurmountable challenges, especially in the context of truth commissions and processes of transitional justice. Victims' needs are often considered secondary to the supposed needs of peace, stability and development that impose

either silence or truth without justice. Algeria is an example. among many. But in the practice and literature of Transitional Justice there are also many voices that insist that both (Truth and Justice) are indispensable elements in the fight against impunity. And these voices have on their side almost all of the legal precedents of international organisations.

Conclusion

There is very little doubt as to the fact that the great majority of - if not all - enforced disappearances with respect to the abductee and the nature of the harm suffered by the relatives with close bonds amount to torture.

When State agents disappear an individual it is generally with the intent to inflict suffering and terror upon his or her relatives/personal social environment, as illustrated in the emblematic case of the Night and Fog Decree cited earlier. This being said, in certain circumstances, the impact of the disappearance may vary on the relative, friend or colleague, depending on a series of factors including the degree of proximity of the relationship, the psychological characteristics of the victim or the duration of the psychological harm suffered, for instance. But the psychological and medical literature certainly points to the fact that the pain, anguish and suffering of abductees and relatives with close bonds alike amount to torture. In addition, notwithstanding the type of impact that the disappearance may have from one person to the other, the measures' intent and its gravity remain objectively the same: it severely punishes and/or intimidates. In judicial proceedings, if each case is to be analysed on a case by case basis, it is suggested that one could presume that enforced disappearances amount to torture for both the abductee and his or her relatives/personal social environment, and that such a

presumption can be rebutted by convincing evidence to the contrary.

This conclusion, as reviewed in this text, is not new. It was already asserted in 1988 in the Velasquez Rodríguez judgment and in many international instances since then while there appears to be no convincing precedents of an opinion disputing such a finding of medicine and law.

In this issue

We present in this Issue the first 6 contributions of the Special Section on ED as Torture. In Issue 2021/3 will appear the remaining 4 texts.

Manon Bourguignon et al. text analyses how grief is experienced by victims of such crimes who are endlessly confronted with uncertainty and exacerbated impunity. She makes a comparative analysis of the different conceptualisations used to describe the grief of relatives and proposes key elements that are common to all of them. The authors conclude that the passing of time does not support the grieving process, on the contrary it seems to reactivate the injury of loss. , *Nicolas Morales* addresses the impact of inadequate investigations and reparation measures regarding enforced disappearances, which occurred in the region of Paine, in Chile, during the Pinochet dictatorship. He stresses the importance of first-person experiences of the relatives of the disappeared which make it possible to account for the subjective and collective dimension of forensic identification. He also discusses the importance of better understanding the intergenerational impacts of such crimes. The concept of victimhood is analysed by *Mina Rauschenbach* in her study dealing with the recognition of victims' status in El Salvador and in Colombia, two countries in which enforced disappearances have occurred on a massive scale during internal armed conflicts. She consid-

ers how such status is legally defined in both countries and how it impacts their experiences in the judicial system.

Alejandra Vicente and Eva Nudd examine the importance of the phenomenon of disappearances in Africa, a region where this crime is underreported. The authors also describe the current discussions held by the African Commission on Human and Peoples Rights on the topic, in particular the evolution of draft guidelines on enforced disappearances in Africa currently being developed by the Commission's Working Group on Death Penalty, Extra-Judicial, Summary or Arbitrary Killings and Enforced Disappearance. *Aïcha Madi* presents a Case Study of Enforced Disappearances in Algeria showing that the impact crosses more than one generation and remains as a hidden wound in society that needs to be addressed by all political actors *Inamul Haq's* contribution discusses how enforced disappearances have impacted women in Kashmir, more specifically how the latter have been marginalised as "half widows", lacking adequate rehabilitation measures to address the emotional and psychological trauma that they face on a daily basis. Both are short reports of qualitative data arising from interviews with victims.

We also have three regular scientific papers not part of the special section. *Ebbe Munk-Andersen et al* present the positive results of a structured questionnaire used for screening asylum seekers in Denmark, *Dongmi Kim and cols* make a review on Efficacy of pharmacotherapy for major depressive disorder and post-traumatic stress disorder from torture showing the lack of strong evidences for any the treatments proposed. *Karen Fondacaro and cols* published in 2018 in Torture Journal a paper explaining the The Chronic Traumatic Stress Framework as a conceptual model to guide empirical investigation and mental health treatment for refugees and survivors

of torture. In this issue they complement that paper with a second paper on Chronic Traumatic Stress Treatment.

It is with great pleasure that we welcome a Forensic Case Series, a new section of the Torture Journal edited by Ben McVane and James Lin. Cases in this section may describe unique or uncommon physical and psychological findings, illustrate barriers to a thorough evaluation, or present features that make effective articulation of a survivor's claim challenging. Case discussions aim to provide further information about findings or reflections on how challenges were approached. They also aim to address common misconceptions about the clinical evaluation and the experience of torture.

All together, this issue, makes up more than 150 pages, the longest in the history of the Journal. All of you, the readers and authors, are responsible for the increasing growth of Torture Journal: a home for all.

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