EUROPEAN COURT OF HUMAN RIGHTS
COUR EUROPÉENNE DES DROITS DE L'HOMME

THIRD SECTION

DECISION

Application no. 56541/17
Sergey Vladimirovich DOBRYNIN against Russia
and 37 other applications
(see appended table)

The European Court of Human Rights (Third Section), sitting on 1 July 2021 as a Committee composed of:

Darian Pavli, *President,*
Dmitry Dedov,
Peeter Roosma, *judges,*

and Viktoriya Maradudina, *Acting Deputy Section Registrar,*

Having regard to the above applications lodged on the various dates indicated in the appended table,

Having regard to the observations submitted by the respondent Government,

Having deliberated, decides as follows:

FACTS AND PROCEDURE

The list of applicants is set out in the appended table.

The applicants' complaints under Article 3 of the Convention concerning the inadequate conditions of detention and the complaints under Article 13 of the Convention concerning the lack of any effective remedy in domestic law in respect of inadequate conditions of detention, were communicated to the Russian Government ("the Government").

THE LAW

A. Joinder of the applications

Having regard to the similar subject matter of the applications, the Court finds it appropriate to examine them jointly in a single decision.

B. Complaints under Article 3 of the Convention (inadequate conditions of detention) and under Article 13 of the Convention (lack of any effective remedy)

In the present applications, the applicants complained of conditions of their post-conviction detention in violation of the national requirements during periods which had already come to an end (for further details see the appended table). They also argued that they did not have an effective domestic remedy to complain about those conditions at the national level. Articles 3 and 13 read:

Article 3

Prohibition of torture

"No one shall be subjected to torture or to inhuman or degrading treatment or punishment."

Article 13

Right to an effective remedy

"Everyone whose rights and freedoms as set forth in [the] Convention are violated shall have an effective remedy before a national authority notwithstanding that the violation has been committed by persons acting in an official capacity."

The Government submitted their observations, having disputed the violations alleged. On 10 January 2020 the Government submitted additional information about the new Compensation Act and asked to treat it as a new remedy in respect of conditions of detention complaints under Articles 3 and 13 of the Convention.

The Court has recently held that applicants are required to make use of the newly introduced compensatory remedy in respect of improper conditions of past correctional detention in breach of domestic standards (see *Shmelev and Others v. Russia* (dec.), no. 41743/17, §§ 153-57, 17 March 2020). In the present case, the applicants complained about the conditions of their post-conviction detention which were, as indicated by the applicants, below the national standard of two square metres per person. Therefore, there are no circumstances which could justify the applicants' failure to have recourse to the new compensatory remedy.

It follows that the complaints under Article 3 of the Convention must be rejected for non-exhaustion of domestic remedies pursuant to Article 35 §§ 1 and 4 of the Convention.

In so far as the applicants refer to Article 13 of the Convention, the Court, having regard to its conclusion concerning Article 3, finds that no separate issue arises under this provision. It finds that this complaint is manifestly ill-founded within the meaning of Article 35 §§ 3 and 4 of the Convention.

For these reasons, the Court, unanimously,

Decides to join the applications;

Declares the applications inadmissible.

Done in English and notified in writing on 22 July 2021.

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Viktoriya Maradudina
Acting Deputy Registrar

Darian Pavli
President

APPENDIX

List of applications raising complaints under Article 3 of the Convention

(inadequate conditions of detention)

No.	Application no. Date of introduction	Applicant's name Year of birth	Representative's name and location	Facility Start and end date Duration	Inmates per brigade Sq. m per inmate Number of toilets per brigade	Specific grievances
1.	56541/17 30/10/2017	**Sergey Vladimirovich DOBRYNIN** 1985		IK-11 Nizhniy Novgorod Region 01/07/2014 to 15/09/2020 6 year(s) and 2 month(s) and 15 day(s)	46 inmate(s) 1.6 m²	Using of leisure room for sleeping, no works' tables, no place in the rest room and overcrowding of the kitchen, stench, no or restricted access to toilet, no or restricted access to running water, lack of requisite medical assistance, insufficient number of sleeping places, lack of fresh air, infestation of cell with insects/rodents.
2.	4036/18 21/06/2018	**Vyacheslav Petrovich PROSVIRIN** 1971		IK-2 Zabaykalskiy Region 03/10/2017 to 03/03/2021 3 year(s) and 5 month(s) and 1 day(s)	140 inmate(s) 1.5 m²	Overcrowding, lack or inadequate furniture, no or restricted access to warm water, lack of fresh air, lack of or restricted access to leisure or educational activities, lack of cell surface to move freely between furniture items, lack of or insufficient natural light, lack of or insufficient electric light, passive smoking.
3.	6005/18 09/01/2018	**Aleksey Petrovich TIMOFEYEV** 1980		IK-11 Nizhniy Novgorod Region 01/07/2014 to 07/08/2018 4 year(s) and 1 month(s) and 7 day(s)	60 inmate(s) 1.5 m² 8 toilet(s)	Overcrowding, infestation of cell with insects/rodents.
4.	9392/18 09/02/2018	**Vyacheslav Vitalyevich TSELKOVIKOV** 1983	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 22/12/2013 to 21/08/2017 3 year(s) and 8 month(s)	less than 2 m²	Overcrowding, mouldy or dirty cell, inadequate temperature, infestation of cell with insects/rodents, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, lack of fresh air, no or restricted access to shower, lack or insufficient quantity of food, poor quality of food.
5.	9410/18 08/02/2018	**Aleksandr Nikolayevich ROZHKOV** 1979	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 13/04/2016 to 12/10/2017 1 year(s) and 6 month(s)	less than 2 m²	Overcrowding, mouldy or dirty cell, infestation of cell with insects/rodents, inadequate temperature, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, lack of fresh air, no or restricted access to shower, lack or insufficient quantity of food, poor quality of food.

No.	Application no. Date of introduction	Applicant's name Year of birth	Representative's name and location	Facility Start and end date Duration	Inmates per brigade Sq. m per inmate Number of toilets per brigade	Specific grievances
6.	9565/18 06/02/2018	**Maksim Aleksandrovich KRAKHMAL** 1988		IK-11 Nizhniy Novgorod Region 25/09/2013 to 22/09/2020 6 year(s) and 11 month(s) and 29 day(s)	1.6 m²	Overcrowding, lack or inadequate furniture, lack of or restricted access to leisure or educational activities, lack of or inadequate hygienic facilities, bad odour in dormitory, lack of fresh air, no or restricted access to running water, no or restricted access to toilet, infestation of cell with insects/rodents, lack of or insufficient physical exercise in fresh air, lack of requisite medical assistance, poor quality of food, lack or insufficient quantity of food.
7.	11737/18 22/02/2018	**Andrey Sergeyevich DAMANOVSKIY** 1983	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 30/12/2014 to 07/11/2017 2 year(s) and 10 month(s) and 9 day(s)	100 inmate(s) 0.6 m²	Overcrowding, mouldy or dirty cell, inadequate temperature, infestation of cell with insects/rodents, lack of or insufficient physical exercise in fresh air, poor quality of food, lack of or insufficient electric light.
8.	13055/18 28/02/2018	**Andrey Vladimirovich PAVLOVSKIY** 1984	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 02/12/2011 to 01/12/2017 6 year(s)	125 inmate(s) less than 2 m²	Infestation of cell with insects/rodents, overcrowding, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, no or restricted access to running water, poor quality of food.
9.	13058/18 28/02/2018	**Daniil Igorevich RYBAKOV** 1993	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 30/03/2016 to 29/01/2018 1 year(s) and 10 month(s)	125 inmate(s) less than 2 m²	Infestation of cell with insects/rodents, overcrowding, lack of fresh air, lack of or insufficient electric light, no or restricted access to running water, poor quality of food.
10.	13088/18 20/02/2018	**Andrey Sergeyevich NEMKOV** 1987	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 20/03/2017 to 17/11/2017 7 month(s) and 29 day(s)	100 inmate(s) 0.6 m²	Lack of or insufficient electric light, infestation of cell with insects/rodents, overcrowding, poor quality of food, lack of fresh air.
11.	13228/18 02/03/2018	**Sergey Aleksandrovich DEVOCHKIN** 1985	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 21/03/2017 to 28/02/2018 11 month(s) and 8 day(s)	100 inmate(s) less than 2 m²	Overcrowding, infestation of cell with insects/rodents, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, poor quality of food.
12.	13246/18 02/03/2018	**Yaroslav Alekseyevich KAMYSHEV** 1980	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 26/05/2013 to 03/11/2017 4 year(s) and 5 month(s) and 9 day(s)	less than 2 m²	Infestation of cell with insects/rodents, lack of or insufficient natural light, lack of fresh air, overcrowding, mouldy or dirty cell.

No.	Application no. Date of introduction	Applicant's name Year of birth	Representative's name and location	Facility Start and end date Duration	Inmates per brigade Sq. m per inmate Number of toilets per brigade	Specific grievances
13.	13670/18 17/02/2018	**Yuriy Nikolayevich KUDRYAVTSEV** 1961	Shirokov Oleg Valeryevich Nizhniy Tagil	IK-3 Sverdlovsk Region 28/05/2013 to 01/03/2019 5 year(s) and 9 month(s) and 2 day(s)	less than 2 m²	Bunk beds, lack of or inadequate hygienic facilities, lack of privacy for toilet, lack of or insufficient electric light, poor quality of food, lack of fresh air, inadequate temperature.
14.	14222/18 05/03/2018	**Irina Pavlovna KUCHINA** 1987	Vinogradov Aleksandr Vladimirovich Kostroma	IK-8 Kostroma Region 17/10/2016 to 02/02/2018 1 year(s) and 3 month(s) and 17 day(s)	less than 2 m²	Inadequate temperature, infestation of cell with insects/rodents, overcrowding, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, poor quality of food, lack of privacy for toilet, lack of toiletries, lack of or inadequate hygienic facilities, shower once a week.
15.	14495/18 12/03/2018	**Andrey Nikolayevich UTKIN** 1981	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 01/12/2016 to 06/03/2018 1 year(s) and 3 month(s) and 6 day(s)	1.7 m²	Overcrowding, mouldy or dirty cell, infestation of cell with insects/rodents, lack of or insufficient natural light, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, lack of fresh air, no or restricted access to shower, poor quality of food, no or restricted access to running water, lack of privacy for toilet, sharing cells with inmates infected with contagious disease.
16.	14522/18 12/03/2018	**Vitaliy Yuryevich YERSHOV** 1990	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 20/09/2017 to 21/02/2018 5 month(s) and 2 day(s)	125 inmate(s) 1.8 m²	Infestation of cell with insects/rodents, overcrowding, lack of fresh air, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, lack of or insufficient natural light, no or restricted access to running water, poor quality of food, lack of requisite medical assistance.
17.	14529/18 16/03/2018	**Yevgeniy Viktorovich CHUMAKOV** 1983	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 10/09/2017 to 09/03/2018 6 month(s)	less than 2 m²	Infestation of cell with insects/rodents, lack of fresh air, lack of or inadequate hygienic facilities, lack of or insufficient natural light, lack of or insufficient physical exercise in fresh air, lack or insufficient quantity of food, mouldy or dirty cell, no or restricted access to shower, no or restricted access to warm water, no or restricted access to potable water, poor quality of food.
18.	14643/18 12/03/2018	**Nikolay Vladimirovich SHATROV** 1988	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 24/02/2015 to 22/02/2018 2 year(s) and 11 month(s) and 30 day(s)	120 inmate(s) 1.9 m²	Dilapidated construction, humidity and mustiness, infestation of cell with insects/rodents, no or insufficient disinfection of barbering and haircutting tools, lack of fresh air, overcrowding during the walk, dirty courtyard, lack of or insufficient electric light, no or restricted access to potable water, no or restricted access to running water, poor quality of food.

No.	Application no. Date of introduction	Applicant's name Year of birth	Representative's name and location	Facility Start and end date Duration	Inmates per brigade Sq. m per inmate Number of toilets per brigade	Specific grievances
19.	14690/18 12/03/2018	**Beslan Shamsudinovich KHAGIYEV** 1977	Vinogradov Aleksandr Vladimirovich Kostroma	IK-7 Kostroma Region 10/09/2011 to 09/01/2018 6 year(s) and 4 month(s)	120 inmate(s) 1 m²	No or restricted access to toilet, lack of privacy for toilet, infestation of cell with insects/rodents, no or insufficient disinfection of barbering and haircutting tools, small dirty courtyard, no or restricted access to potable water, poor quality of food, sharing cells with inmates infected with contagious disease.
20.	14871/18 12/03/2018	**Rufim Anatolyevich SIDOROV** 1981		IK-2 Zabaykalskiy Region 24/10/2017 to 24/12/2020 3 year(s) and 2 month(s) and 1 day(s)	144 inmate(s) 1.5 m² 8 toilet(s)	Lack of fresh air, inadequate temperature, lack of or insufficient electric light, lack of or insufficient natural light, mouldy or dirty cell, no or restricted access to warm water, no or restricted access to running water, no or restricted access to shower, lack of privacy for toilet, inadequate clothing.
21.	14873/18 12/03/2018	**Aleksandr Sergeyevich PONOMAREV** 1975	Shirokov Oleg Valeryevich Nizhniy Tagil	IK-19 Sverdlovsk Region 04/07/2016 to 29/12/2017 1 year(s) and 5 month(s) and 26 day(s) IK-19 Sverdlovsk Region 22/01/2018 to 03/09/2019 1 year(s) and 7 month(s) and 13 day(s)	less than 2 m² less than 2 m²	Lack of privacy for toilet, lack of or inadequate hygienic facilities, inadequate temperature, sharing cells with inmates infected with contagious disease, poor quality of food, lack of or insufficient electric light, no or restricted access to running water, passive smoking, lack of or insufficient physical exercise in fresh air.
22.	14971/18 16/03/2018	**Vladimir Nikolayevich YEVDOKIMOV** 1988	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 26/07/2011 to 11/12/2017 6 year(s) and 4 month(s) and 16 day(s)	less than 2 m²	Infestation of cell with insects/rodents, overcrowding, lack of fresh air, lack of or insufficient electric light, no or restricted access to warm water, poor quality of food.
23.	15299/18 10/02/2018	**Andrey Aleksandrovich KHORKOV** 1979	Valeyev Albert Rafailovich Nizhniy Tagil	IK-12 Sverdlovsk Region 05/11/2016 to 05/02/2019 2 year(s) and 3 month(s) and 1 day(s)	less than 2 m²	Lack of privacy for toilet, lack of or inadequate hygienic facilities, inadequate temperature, lack of fresh air, lack of or insufficient electric light, lack of or insufficient natural light, lack of or insufficient physical exercise in fresh air, poor quality of food, sharing cells with inmates infected with contagious disease, overcrowding, lack of toiletries, no or restricted access to toilet.

No.	Application no. Date of introduction	Applicant's name Year of birth	Representative's name and location	Facility Start and end date Duration	Inmates per brigade Sq. m per inmate Number of toilets per brigade	Specific grievances
24.	15305/18 02/03/2018	**Sergey Vitalyevich UGLOV** 1978	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 08/06/2017 to 07/02/2018 8 month(s)	100 inmate(s) less than 2 m²	Mouldy or dirty cell, overcrowding, poor quality of food, infestation of cell with insects/rodents, lack of or insufficient electric light, lack of or insufficient physical exercise in fresh air.
25.	15802/18 14/03/2018	**Aleksey Gennadyevich GLUSHICHKIN** 1984	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 20/05/2011 to 20/02/2018 6 year(s) and 9 month(s) and 1 day(s)	100 inmate(s) 0.5 m²	Mouldy or dirty cell, overcrowding, poor quality of food, lack of or inadequate hygienic facilities, infestation of cell with insects/rodents, lack of or insufficient electric light.
26.	15863/18 14/03/2018	**Yelena Aleksandrovna ARISTOVA** 1993	Vinogradov Aleksandr Vladimirovich Kostroma	IK-3 Kostroma Region 14/10/2014 to 13/12/2017 3 year(s) and 2 month(s)	100 inmate(s) 0.6 m²	Inadequate temperature, infestation of cell with insects/rodents, overcrowding, lack of or insufficient electric light, lack of or inadequate hygienic facilities, poor quality of food.
27.	15864/18 16/03/2018	**Ilya Leonidovich MIKHAYLOV** 1982	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 12/07/2013 to 11/01/2018 4 year(s) and 6 month(s)	130 inmate(s) less than 2 m²	Overcrowding, mouldy or dirty cell, infestation of cell with insects/rodents, lack of or insufficient natural light, lack of fresh air, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, no or restricted access to shower, poor quality of food, no or restricted access to running water, lack of privacy for toilet, sharing cells with inmates infected with contagious disease.
28.	16964/18 23/03/2018	**Aleksandr Anatolyevich KERZHENTSEV** 1967	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 14/09/2012 to 25/12/2017 5 year(s) and 3 month(s) and 12 day(s)	0.6-0.9 m²	Overcrowding, infestation of cell with insects/rodents, lack of fresh air, mouldy or dirty cell, lack of or poor quality of bedding and bed linen, lack of or inadequate hygienic facilities, shower once a week, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, lack of or insufficient natural light, poor quality of food, lack or insufficient quantity of food, sharing cells with inmates infected with contagious disease.
29.	17493/18 27/03/2018	**Andrey Anatolyevich MALYSHEV** 1980	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 22/12/2014 to 19/01/2018 3 year(s) and 29 day(s)	0.9 m²	Lack of fresh air, lack of or insufficient electric light, mouldy or dirty cell, no or restricted access to toilet, no or restricted access to running water, poor quality of food, sharing cells with inmates infected with contagious disease.

No.	Application no. Date of introduction	Applicant's name Year of birth	Representative's name and location	Facility Start and end date Duration	Inmates per brigade Sq. m per inmate Number of toilets per brigade	Specific grievances
30.	17496/18 27/03/2018	**Nikolay Aleksandrovich MOROZOV** 1967	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 06/04/2016 to 05/10/2017 1 year(s) and 6 month(s)	0.9 m²	Infestation of cell with insects/rodents, lack of fresh air, mouldy or dirty cell, poor quality of food, lack of or insufficient electric light, lack of or insufficient physical exercise in fresh air, no or restricted access to running water, no or restricted access to toilet, sharing cells with inmates infected with contagious disease.
31.	17497/18 27/03/2018	**Denis Sergeyevich KUZMIN** 1987	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 10/01/2013 to 09/01/2018 5 year(s)	1.9 m²	Mouldy or dirty cell, infestation of cell with insects/rodents, lack of fresh air, constant electric light, no or restricted access to running water, no or restricted access to shower, no or restricted access to toilet, sharing cells with inmates infected with contagious disease, poor quality of food.
32.	17656/18 27/03/2018	**Aleksandr Vladimirovich KEPOV** 1985	Vinogradov Aleksandr Vladimirovich Kostroma	IK-7 Kostroma Region 14/07/2011 to 04/12/2017 6 year(s) and 4 month(s) and 21 day(s)	120 inmate(s) 1.9 m² 3 toilet(s)	Overcrowding, infestation of cell with insects/rodents, lack of or inadequate hygienic facilities, no or restricted access to toilet, no or restricted access to running water, no or restricted access to shower, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, sharing cells with inmates infected with contagious disease, poor quality of food.
33.	19746/18 03/04/2018	**Svyatoslav Aleksandrovich GORBUNOV** 1981	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 19/09/2017 to 07/03/2018 5 month(s) and 17 day(s)	100 inmate(s) 0.6 m²	Overcrowding, mouldy or dirty cell, infestation of cell with insects/rodents, lack of or insufficient physical exercise in fresh air, lack of or insufficient electric light, poor quality of food, no or restricted access to running water.
34.	21009/18 10/04/2018	**Ivan Aleksandrovich GERASIMOV** 1982	Vinogradov Aleksandr Vladimirovich Kostroma	IK-1 Kostroma Region 05/06/2017 to 04/04/2018 10 month(s)	130 inmate(s) less than 2 m²	Infestation of cell with insects/rodents, overcrowding, mouldy or dirty cell, lack of or insufficient electric light, no or restricted access to warm water, poor quality of food.
35.	22149/18 17/04/2018	**Yevgeniy Siyadovich TUMPAROV** 1981		IK-11 Nizhniy Novgorod Region 01/12/2015 to 29/12/2020 5 year(s) and 29 day(s)	1.1 m²	Lack of or inadequate hygienic facilities, lack or insufficient quantity of food, lack of fresh air.
36.	28452/18 16/05/2018	**Vitaliy Vitalyevich KLYUYEV** 1976		IK-11 Nizhniy Novgorod Region 17/08/2015 to 30/03/2021 5 year(s) and 7 month(s) and 14 day(s)	130 inmate(s) 1.35 m² 6 toilet(s)	Overcrowding, infestation of cell with insects/rodents, no or restricted access to shower, lack of toiletries, lack of requisite medical assistance, poor quality of food.

No.	Application no. Date of introduction	Applicant's name Year of birth	Representative's name and location	Facility Start and end date Duration	Inmates per brigade Sq. m per inmate Number of toilets per brigade	Specific grievances
37.	32333/18 29/06/2018	**Igor Borisovich SAVIN** 1963		IK-11 Nizhniy Novgorod Region 08/11/2016 to 16/06/2020 3 year(s) and 7 month(s) and 9 day(s)	140 inmate(s) 1.6 m² 6 toilet(s)	Overcrowding, lack or inadequate furniture, no or restricted access to warm water, no or restricted access to running water, no or restricted access to toilet, lack of privacy for toilet, no facilities for washing clothes, lack of proper conditions for eating, poor quality of potable water, infestation of cell with insects/rodents, lack of or insufficient natural light, lack of or insufficient electric light, lack of requisite medical assistance, sharing cells with inmates infected with contagious disease, scarce space for walking in fresh air, delayed and unregular removal of food waste, poor quality of food, insufficient time for eating, lack and poor quality of supplied clothing, no or restricted access to shower, critical condition of the colony building, lack or insufficient quantity of food, lack of fresh air, lack of or restricted access to leisure or educational activities, lack of or insufficient physical exercise in fresh air, passive smoking, no or restricted access to potable water, mouldy and dirty shower.
38.	11654/19 20/01/2019	**Roman Nikolayevich DENEZHKIN** 1981		IK-8 Komi Republic 05/08/2014 to 07/04/2021 6 year(s) and 8 month(s) and 3 day(s)	60 inmate(s) < 1,2 m²	Overcrowding, no or restricted access to toilet, no or restricted access to warm water.