

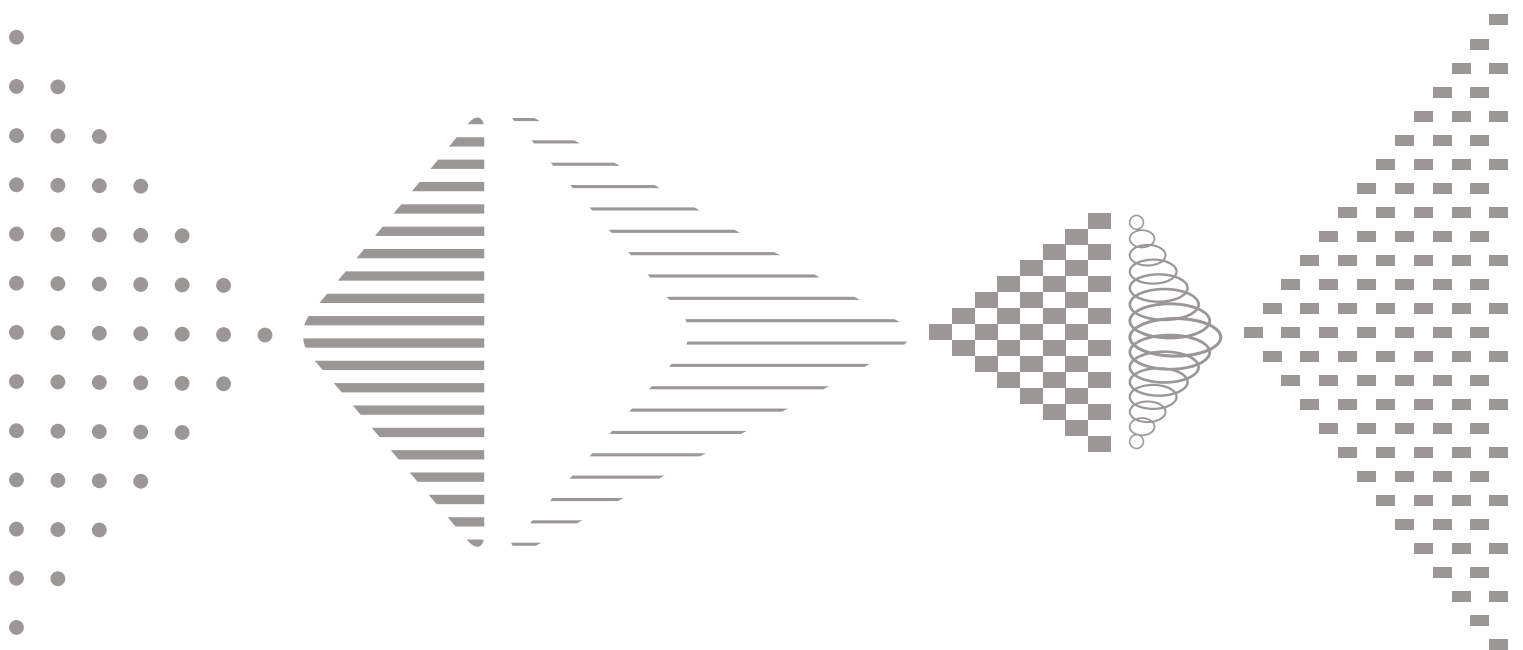


SIVILOMBUDET

Norwegian Parliamentary Ombud

SECURITY CELLS IN NORWEGIAN PRISONS

Thematic report 2025



This investigation was carried out by the Norwegian Parliamentary Ombud's National Preventive Mechanism, which safeguards Norway's obligations under the UN Optional Protocol to the Convention against Torture (OPCAT). The unit visits places where people are deprived of their liberty in order to prevent torture and inhuman or degrading treatment.

This English translation has been produced with the assistance of AI, and subsequently edited and verified by the Norwegian Parliamentary Ombud.

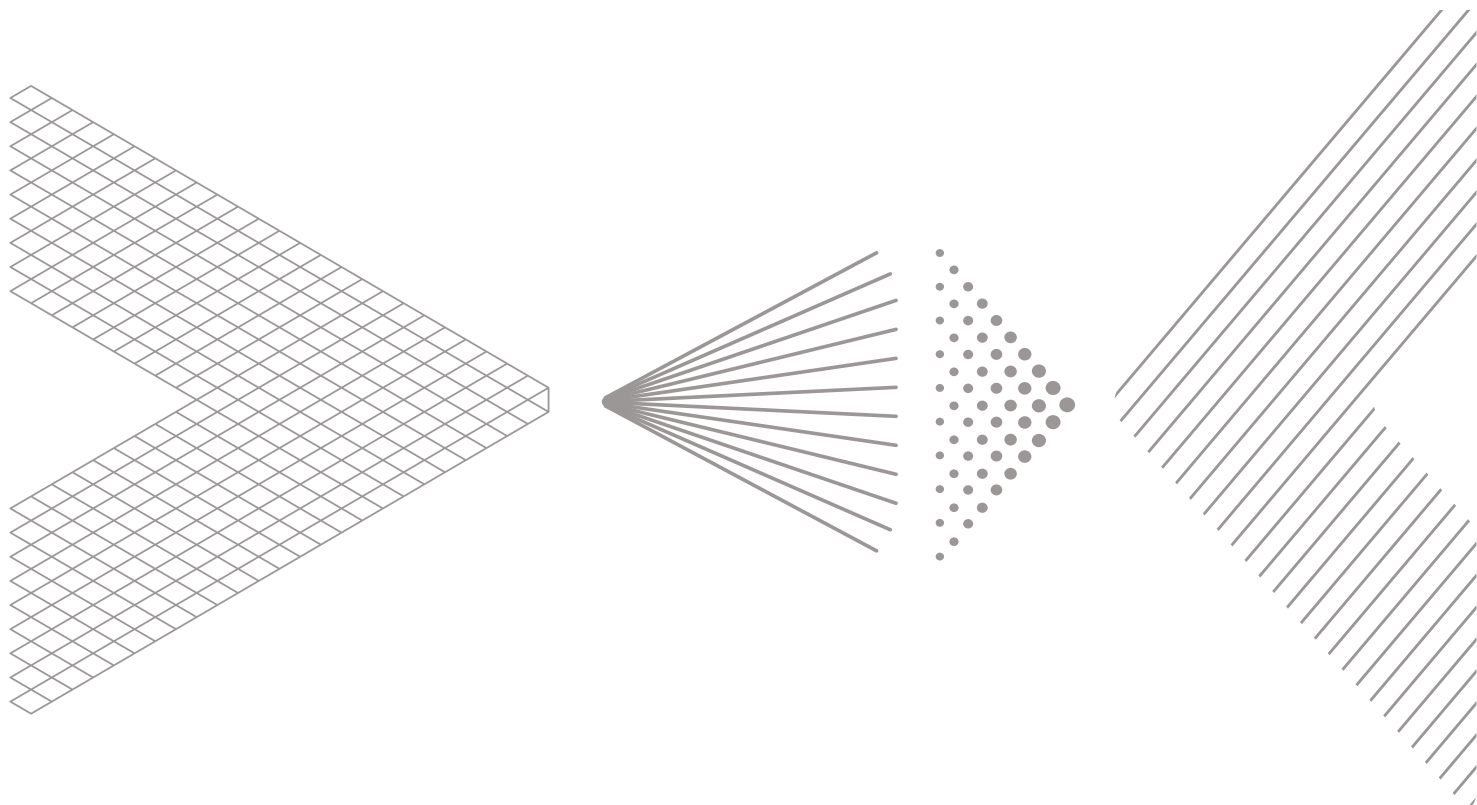
Front page photo: Security cell in Trondheim Prison, Nermarka unit.



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Summary

Background

Solitary confinement in a security cell is among the most intrusive measures that may be used against prisoners. The measure is intended to be used only in very serious situations.

Based on visits to 13 prisons in 2023–2025, this thematic report examines the risks of violating the prohibition against torture and inhuman or degrading treatment when prisoners are placed in a security cell.

The physical design of security cells

A security cell is a naked concrete cell containing only a plastic mattress and a hole in the floor that serves as a toilet. The cell deprives prisoners of almost all personal autonomy and sensory input and puts them in humiliating situations. They must use the toilet without any form of privacy, they cannot maintain basic hygiene, and in many cases food and drink are passed to them through a hatch at floor level. The acoustics and lighting make conversation and sleep difficult.

In this report the Parliamentary Ombud concludes that the way the cells are designed constitutes a risk of violating the prohibition against inhuman or degrading treatment.

Security cell decisions are upheld for too long

Few placements in a security cell lasted less than 24 hours. In seven of the prisons, several prisoners remained in a security cell for three days or more. The longest placement lasted 13 days.

The report concludes that many prisoners remain in a security cell longer than the law permits. All prisons assessed too infrequently whether the placement could be ended, and the reasoning provided was often seriously inadequate.

Many prisoners placed in a security cell are particularly vulnerable to the harms of isolation. This includes prisoners with mental health challenges, intellectual disabilities, trauma, suicide risk, or young age. In four prisons, a large majority of security cell decisions were based on suicide attempts, self-harm, or statements about wanting to take one's own life. Some were placed directly in a security cell after being saved from a suicide attempt.

Security cell placements lasting several days or imposed on young prisoners or on prisoners with suicide risk or mental health challenges, entail a high risk of violating the prohibition against inhuman or degrading treatment.

Use of disproportionate force

The report highlights particularly concerning treatment of some prisoners. This included prisoners who had spent many days in a security cell, cases where handcuffs and pepper spray were used inside the cell, and incidents where prisoners were deprived of a mattress for several days. The Ombud concludes that these cases appear to constitute violations of the prohibition against inhuman or degrading treatment.

Need for measures to prevent placement in security cells

The report identifies shortcomings in the prisons' knowledge of the legal framework, in conflict prevention, and in the care of prisoners in crisis who are particularly vulnerable to the harms of isolation. It also points to weaknesses in how prisons learn from previous incidents.

One of the prisons had, over an extended period, succeeded in reducing the use of security cells to a very low level. This reduction resulted from various measures introduced by the prison that changed how staff responded to prisoners who acted out or harmed themselves.

Recommendations

- ▶ The Ministry of Justice and Public Security and the Directorate of the Norwegian Correctional Service should jointly ensure that the design of security cells is not more intrusive than necessary for the purpose. The design should safeguard prisoners' basic needs and dignity.
- ▶ The Ministry of Justice and Public Security should issue further regulations on how prisons are to ensure that placements in security cells do not last longer than strictly necessary. The regulations should include minimum requirements for the content of continuous assessments of the decision and how often such assessments must be documented. The Directorate of the Norwegian Correctional Service should issue more detailed guidelines to ensure implementation at prison level.
- ▶ The Ministry of Justice and Public Security and the Directorate of the Norwegian Correctional Service should introduce measures to ensure that prisons work systematically to prevent the use of coercive measures and solitary confinement.



The security cells in Åna Prison are located in the basement, with a strong smell of sewage during the Parliamentary Ombud's visit in 2025. Photo: Parliamentary Ombud.

PART 1

INTRODUCTION





In Bodø Prison, one of the security cells had a floor area of only 5.25 square metres. The ceiling height was 2.1 metres. Photo: Parliamentary Ombud.

1. Security cells entail a high risk of inhuman or degrading treatment

Solitary confinement in a security cell is among the most intrusive measures that can be used against prisoners and should only be used in very serious situations.¹

Security cells are naked concrete cells, with smooth walls and no furnishings other than a plastic mattress and a toilet consisting of a hole in the floor. Placement in a security cell entails isolation from other people. Solitary confinement is intrusive and harmful to the physical and mental health of prisoners. This has been thoroughly documented in the research literature.² Findings indicate that a large proportion of those who are isolated experience physical or psychological symptoms as a result of the isolation. The harmful effects vary and depend, among other things, on the extent, severity and duration of the isolation, as well as on the characteristics of the individual prisoner.

A security cell differs from other forms of isolation in that its design provides extremely limited sensory input and deprives the prisoner of the ability to attend to their own basic needs. Its physical configuration therefore

reinforces the harmful elements of isolation. The design of the cells may cause the prisoner to become disoriented after a short time. The prisoner does not know when he or she may return to their ordinary cell, and this lack of predictability may contribute to further psychological strain, leading to reactions such as apathy, panic, racing thoughts and aggression.

Because isolation in a security cell is so intrusive, the law sets strict conditions for its use, and the prison must continuously assess whether the grounds for the placement still exist.³

The significant potential for harm associated with isolation in a security cell entails a high risk of breaching the human rights prohibition against inhuman or degrading treatment. Whether isolation in a security cell constitutes such a breach depends on an overall assessment. The physical conditions, the intrusiveness of the isolation, its duration, its purpose, and its effects on the prisoner are key elements (see Chapter 3, Legal Framework).

Health effects of isolation

The most common symptoms are psychological, but physical symptoms and ailments have also been documented. Physical symptoms may include heart palpitations, sweating, insomnia, pain in the joints and back, impaired vision, poor appetite and digestive problems, exhaustion or feelings of weakness, trembling and sensations of cold.

Psychological symptoms may range from anxiety, apathy and social withdrawal, difficulties with concentration, hypersensitivity to noise and racing thoughts, to severe depression, panic disorder and acute psychosis. Increased levels of aggression, anger, self-harm and suicide attempts are also reported.

Existing conditions and vulnerabilities may be exacerbated by isolation.

¹ See also the Parliamentary Ombud, *Use of Security Beds in Norwegian Prisons*, thematic report 2020.

² The research is summarised in the Parliamentary Ombud, *Special Report to the Storting on Solitary Confinement and Lack of Human Contact in Norwegian Prisons*, Document 4:3 (2018/2019), Chapter 4.

³ Section 38 of the Norwegian Execution of Sentences Act.

2. About the thematic report

Almost all Norwegian high-security prisons have security cells.

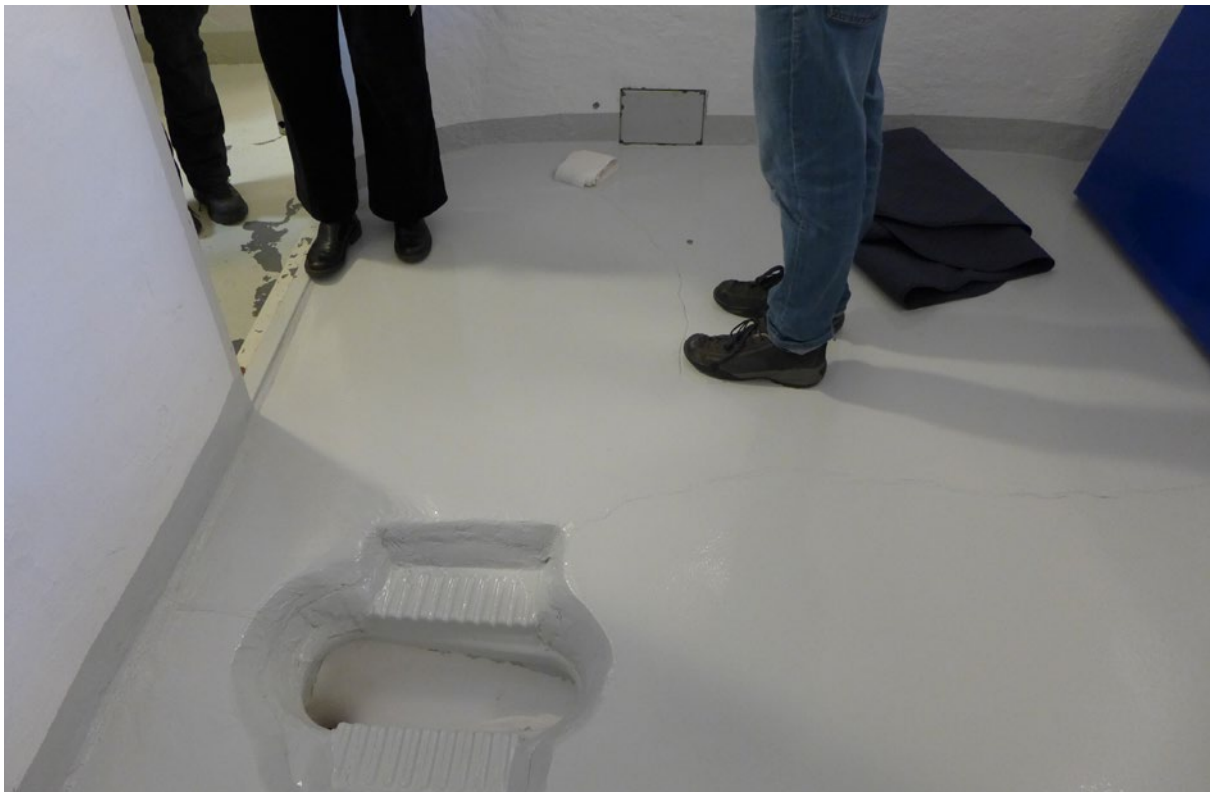
From 2018 to 2024, there were on average around 340 decisions annually in the correctional services.⁴

This thematic report is based on a total of 13 visits to high-security prisons between 2023 and 2025. In 2023 and 2024, the Parliamentary Ombud's National Preventive Mechanism examined, among other things, the use of security cells during visits to the prisons in Ringerike, Eidsberg, Bodø, Halden, Froland, Bredtveit, Stavanger and Trondheim.

Due to several serious findings, the Preventive Mechanism decided in 2025 to carry out visits solely focused on the use of security cells in the prisons in Oslo, Ullersmo, Åna, Mandal and Skien. In connection with these reports, we obtained a total of 420 decisions

concerning the use of security cells. During the same period, we also examined the placement of minors in security cells at Bjørgvin prison, juvenile detention unit. The findings from that visit are published in a separate report and are not addressed further here.⁵

The 13 visits revealed a number of serious shortcomings in the prisons' use of security cells. These are described in separate visit reports for each prison, which include recommendations that the prisons are expected to follow up. In this report, we review the conditions that most significantly affect the risk of violating the prohibition against inhuman or degrading treatment. The report explains how the design of security cells (Chapter 4) and prolonged stays in security cells (Chapter 5) increase the risk of serious human rights violations. We also review our findings regarding the prisons' efforts to prevent the use of security cells (Chapter 6).



In Oslo Prison, the Parliamentary Ombud found that the security cells were designed in a way that was intrusive. Photo: Parliamentary Ombud.

⁴ Directorate of the Norwegian Correctional Service (2025). *Annual Report 2024*.

⁵ Parliamentary Ombud, Visit report – *Bjørgvin Prison's juvenile unit (2025)*.

3. Legal framework

Being isolated in a security cell is highly intrusive, harmful to the health of the prisoners, and may constitute a breach of the prohibition against torture and inhuman or degrading treatment.⁶ This prohibition follows from the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, as well as from Article 3 of the European Convention on Human Rights (ECHR).⁷

The European Court of Human Rights (ECtHR) has established that any form of isolation without sufficient mental and physical stimulation over time is harmful, and should only be used as an exceptional and temporary measure.⁸ Whether the prohibition has been breached depends on a concrete overall assessment.⁹ Below, we outline the most relevant elements from the Court's case law.¹⁰

The physical conditions during the isolation form part of the assessment of whether the prohibition has been violated.¹¹ The use of isolation cells with severely limited access to normal sensory input and no natural daylight increases the impact of isolation.¹² Other relevant factors include the cell's size and design, noise and lighting conditions, and the extent to which basic needs such as sleep, food and drink, and access to a toilet can be met.¹³

The intrusiveness of isolation is also assessed on the basis of whether the prisoner is offered activities (indoors and outdoors) and social contact with others, including prison staff, healthcare personnel, and other individuals.¹⁴ The prison's follow-up of isolated prisoners is of great importance, for example, how it has sought to mitigate the harmful effects of isolation by facilitating increased social contact, physical activity, and time outdoors. The European Prison Rules state that all prisoners who are isolated must be offered at least two hours of meaningful human contact each day.¹⁵

The duration of the isolation is crucial to the overall assessment, not least because the risk of harm increases the longer the isolation lasts. The Court has not set an absolute time limit for different forms of isolation, but has emphasised that isolation cannot continue indefinitely.¹⁶ Case law shows that the Court is, among other things, critical to situations where the isolation is maintained after the prisoner no longer poses a security risk.¹⁷ Repeated use of long-term isolation over extended periods, interrupted only by short intervals in a normal prison regime, may also constitute a violation of the prohibition.¹⁸

The purpose of the isolation is relevant to how long it may last. The ECtHR and the Council of Europe's Committee for the Prevention of Torture (CPT) have

6 UN Convention against Torture, Article 1 cf. Article 16; UN International Covenant on Civil and Political Rights, Article 7; and Article 3 of the European Convention on Human Rights (ECHR).

7 See also, for example, UN Human Rights Committee, individual complaint *Corey Brough v. Australia*, 17 March 2006, communication No. 1184/2003, doc. CCPR/C/86/D/1184/2003; and UN Committee against Torture, individual complaint *Sidi Abdallah Abbahah v. Morocco*, 24 November 2021, communication No. 871/2018, doc. CAT/C/72/D/871/2018.

8 ECtHR, *Csüllög v. Hungary*, 7 June 2011, application No. 30042/08, paragraph 34; ECtHR, *Rzakhanov v. Azerbaijan*, 4 July 2013, application No. 4242/07, paragraph 73. See also *Babar Ahmad and Others v. the United Kingdom*, 10 April 2012, application No. 24027/07 et al., paragraph 212; *Iorgov v. Bulgaria*, 11 March 2004, application No. 40653/98, paragraph 83.

9 E.g. ECtHR, *Gäfgen v. Germany* (Grand Chamber), 1 June 2010, application No. 22978/05, paragraph 88.

10 Key factors in the assessment follow, inter alia, from ECtHR, *Rohde v. Denmark*, 21 July 2005, application No. 69332/01, paragraph 93; *Rzakhanov v. Azerbaijan*, 4 July 2013, application No. 4242/07, paragraph 64; and *Babar Ahmad and Others v. the United Kingdom*, 10 April 2012, application No. 24027/07 et al., paragraph 212.

11 See, inter alia, ECtHR, *Onoufriou v. Cyprus*, 7 January 2010, application No. 24407/04, paragraph 76; ECtHR, *A.T. v. Estonia* (No. 2), 13 November 2018, application No. 40646/14, paragraph 78.

12 ECtHR, *Simeonovi v. Bulgaria* (Grand Chamber), 12 May 2017, application No. 21980/04, paragraphs 88–91; ECtHR, *Schmidt and Šmigol v. Estonia*, 28 November 2023, application No. 3501/20, paragraph 152. See also ECtHR, *Abu Zubaydah v. Lithuania*, 31 May 2018, application No. 46454/11, paragraphs 551–552 and paragraph 640 (total sensory deprivation).

13 ECtHR, *Onoufriou v. Cyprus*, 7 January 2010, application No. 24407/04, paragraphs 75 and 79; ECtHR, *Harackchiev and Tolumov v. Bulgaria*, 8 July 2014, application No. 15018/11 et al., paragraphs 208–211.

14 E.g. ECtHR, *Rohde v. Denmark*, 21 July 2005, application No. 69332/01, paragraphs 97–98.

15 European Prison Rules, Rule 53A (a).

16 ECtHR, *Ramirez Sanchez v. France* (Grand Chamber), 4 July 2006, application No. 59450/00, paragraph 145.

17 ECtHR, *Khider v. France*, 9 July 2009, application No. 39364/05, paragraphs 117–118.

18 ECtHR, *Schmidt and Šmigol v. Estonia*, 28 November 2023, application No. 3501/20, paragraphs 156–163.

accepted short-term placement in a special cell to prevent harm to the prisoner or to others, but have emphasised that such measures cannot continue for extended periods.¹⁹ CPT recommends that stays in special cells should normally last minutes rather than hours, and that individuals isolated for more than one day to prevent self-harm should be transferred to a healthcare institution.²⁰ The Committee has also recommended that the necessity of the measure be assessed “frequently”.²¹

How the isolation affects the prisoner is also of significance. Particular weight must be given to whether the prisoner is especially vulnerable to the harmful effects of isolation, for example, due to very high or very young age, physical illness, or disability. The ECtHR has been particularly critical of isolation imposed on prisoners with serious mental health problems or at suicide risk.²² The UN Standard Minimum Rules for the Treatment of Prisoners (the Mandela Rules) state that isolation of prisoners with diminished physical or mental capacity should be prohibited where their condition is exacerbated by isolation.²³

It is also important that the **legal safeguards and welfare of isolated prisoners are ensured**. Solitary confinement must be justified in a way that demonstrates that the prisoner’s circumstances, situation, and behaviour have been taken into account. The longer the isolation lasts, the stricter the requirements are for the State’s justification.²⁴

When placing prisoners under solitary confinement, **the prisoner’s state of health** must also be taken into

account.²⁵ Regular monitoring of the physical and mental health of prisoners in solitary confinement must be established.²⁶ According to international minimum standards, prisoners subjected to any form of isolation must be seen by healthcare personnel every day.²⁷ Healthcare personnel must immediately notify the prison governor if they are concerned about the harmful effects of the isolation, and must advise if they consider that the stay should be terminated for health reasons.²⁸

The use of solitary confinement must also be **viewed in conjunction with other intrusive measures and the overall prison conditions**. The ECtHR and CPT have been critical of cases where prisoners have been isolated in a security cell while naked, where they have been deprived of a mattress, or where handcuffs or similar restraints have been applied during solitary confinement; particularly where the grounds for such measures are poorly documented.²⁹

According to Norwegian domestic law, under section 38 of the Execution of Sentences Act, a security cell may only be used when it is “strictly necessary”, and only if “less intrusive measures have been attempted without success, or are clearly insufficient”.³⁰ The prison’s need to place a prisoner in a security cell must also be weighed against the negative consequences of the measure for the individual (principle of proportionality).³¹ These conditions mean that a security cell may be used only in exceptional and very serious situations. All legal conditions for the use of a security cell must be met throughout the entire period the measure is maintained. The prison must therefore “continuously assess” this and terminate the placement as soon as the grounds no longer exist.³²

19 ECtHR, *Vukušić v. Croatia*, 14 November 2023, application No. 37522/16, paragraphs 24, 25 and 37. The Court endorses the CPT’s views expressed in its report following the visit to Croatia (2018), CPT/Inf (2018) 44, paragraph 60. See also in the same vein ECtHR, *Jeanty v. Belgium*, 31 March 2020, application No. 82284/17, paragraph 116.

20 CPT, report following the visit to Croatia (2018), CPT/Inf (2018) 44, paragraph 60. See also the CPT’s reports following visits to Denmark (2024), CPT/Inf (2024) 38, paragraphs 105–106, and to North Macedonia (2019), CPT/Inf (2021) 8, paragraph 99.

21 CPT, report following the visit to Norway 2024, CPT/Inf (2025) 3, paragraph 134.

22 ECtHR, *Keenan v. the United Kingdom*, judgment of 4 March 2001, application No. 27229/95, paragraphs 109–116. See also *Khider v. France*, 9 July 2009, application No. 39364/05, paragraphs 119–122; *Rivière v. France*, 25 July 2013, application No. 33834/03, paragraph 63; *Renolde v. France*, 16 October 2008, application No. 5608/05, paragraph 120.

23 Mandela Rules, Rule 45 (2).

24 ECtHR, *Babar Ahmad and Others v. the United Kingdom*, 10 April 2012, application No. 24027/07 et al., paragraph 212.

25 ECtHR, *Jeanty v. Belgium*, 31 March 2020, application No. 82284/17, paragraph 117.

26 ECtHR, *Babar Ahmad and Others v. the United Kingdom*, 10 April 2012, application No. 24027/07 et al., paragraph 212.

27 UN Standard Minimum Rules for the Treatment of Prisoners (the Mandela Rules), Rule 45 (2); European Prison Rules, Rule 43.2; and CPT, report following the visit to Croatia 2017, CPT/Inf (2018) 44, paragraph 60. See also Prop. 165 L (2024–2025), where the Ministry proposes to enshrine in the Health and Care Services Act that prisoners in a security cell must be supervised by healthcare personnel at least once per day.

28 Mandela Rules, Rule 46 (2).

29 ECtHR, *Hellig v. Germany*, 7 July 2011, application No. 20999/05, paragraphs 52–58; *Vukušić v. Croatia*, 14 November 2023, application No. 37522/16, paragraph 37. CPT, report following the visit to Croatia (2018), CPT/Inf (2018) 44, paragraphs 59–60; CPT, report following the visit to North Macedonia 2023, CPT/Inf (2024) 17, paragraphs 87–88.

30 Section 38, first and third paragraphs, of the Norwegian Execution of Sentences Act.

31 Prop. 143 L (2019–2020), Chapter 5.8.4; a proportionality requirement when using isolation also follows from ECtHR case law, see e.g. *Babar Ahmad and Others v. the United Kingdom*, application No. 24027/07 et al., 10 April 2012, paragraph 212.

32 Section 38, fourth sentence of the third paragraph, of the Norwegian Execution of Sentences Act

PART 2

RISK OF INHUMAN OR DEGRADING TREATMENT IN THE USE OF SECURITY CELLS





The security cells in Romerike Prison, Ullersmo unit, are smaller than the minimum standard set by the Council of Europe's Committee for the Prevention of Torture. Photo: Parliamentary Ombud.

4. The design of security cells

4.1. Intrusive and degrading physical conditions

Neither the Execution of Sentences Act nor its associated regulations contain requirements for the physical design of security cells. Under current rules, it is the Directorate of the Norwegian Correctional Service that approves the design and equipment of security cells, in accordance with its own circular.³³ The Directorate's standards include detailed requirements intended to safeguard security, but provide prisons little scope for solutions that safeguard prisoners' basic needs.

The security cells in the prisons we visited were designed as completely bare concrete cells, with no furniture or place to sit, containing only a plastic mattress on the floor and a toilet consisting of a hole in the floor. In most cases, the windows were small or frosted and let in little daylight. They were often placed high up on the wall and offered little or no view. Most security cells were painted in grey tones, and many had very little colour contrast between walls, ceiling and floor. Only two prisons had windows with a view of nature and natural light. The design of the cells therefore entailed a severe limitation of sensory input.

Prisoners we interviewed used words such as "very painful", "degrading", "frightening", and "a rat hole" to describe the security cell. Some said they "relived previous traumas", "had racing thoughts and cried in the cell", or that "they were afraid of becoming ill again". Prisoners who had been placed in a security cell to prevent self-harm or suicide told us they avoided speaking about mental health problems out of fear of being placed in a security cell again. Some felt they were locked in and abandoned, and that none of the staff carrying out checks would speak to them.

The security cells were often located in remote parts of the prison, far from the staff office, behind several doors and thick concrete walls. Prisoners therefore had

to contact staff by pressing a button on the wall of the security cell. They received no clear indication when using the button and did not know whether their call had been registered or whether anyone would follow it up. These conditions contribute to a sense of being abandoned and unable to influence one's situation.

The physical design of the security cell imposed severe restrictions on prisoners' autonomy and meant they were entirely dependent on staff to meet basic needs. Lighting and floor heating could only be controlled from outside, and prisoners had to ask staff to adjust these if, for example, they wished to sleep or were cold. In some prisons, it emerged that the lighting in the security cell made it difficult for prisoners to sleep.

The toilet in the floor had no screening, and prisoners had to use it without being able to prevent staff from seeing them. They also had to notify staff when the toilet needed flushing or when used sanitary pads or tampons needed to be removed. None of the cells had access to running water for washing after using the toilet.

What did the experience of being in a security cell do to you?

You become angrier. More frustrated. It doesn't help at all. [...] It shouldn't be used on people who are aggressive, because it doesn't help. Either you get much worse, or you just store up all that anger and then it explodes two days later. It's not good. And it messes with your head as well.

(Prisoner)

³³ See the Regulations to the Execution of Sentences Act, Section 3-11, third paragraph, and the Directorate of the Norwegian Correctional Service's guidelines KSF-2008-9001, point 38.1. The circular itself, *Standard Requirements for Security Cells pursuant to Section 38 of the Execution of Sentences Act*, 6 November 2023, is not publicly available.



The security cells have a floor-level hatch used for distributing food and drink. Oslo Prison. Photo: Parliamentary Ombud.

***When they are given food...
They are treated like animals.
The food is passed through a hatch in
the floor. It is so undignified [...] Food
through the hatch is not about safety.
It is about human dignity. They could
open the door. If you are able to eat,
you are not going to act out.***

(Healthcare staff member in the prison)

In most of the prisons, prisoners received food, drink and toilet paper pushed in through a hatch at floor level. The size of the security cells meant that this hatch was often located in proximity to the hole in the floor that serves as a toilet. CPT raised this issue after its visit to Norway in 2018 and recommended that the authorities ensure that the floor-level hatch is, as far as possible, not used for delivering food and drink.³⁴ The Norwegian authorities responded to CPT's recommendation by stating that food and drink should only exceptionally be provided through the floor hatch.³⁵ Our find-

ings show that the distribution of food via the floor hatch remains widespread.

With two exceptions, the security cells lacked direct access to drinking water. Prisoners therefore had to contact staff to obtain water. By comparison, under the current police custody regulations, police holding cells must have a source of water inside the cell.³⁶

Passing food through a hatch in the floor near a toilet, combined with the lack of opportunities to maintain hygiene, undermines prisoners' dignity.³⁷ Some prisoners chose not to eat because they did not want to use the toilet or eat without being able to wash their hands afterwards.

***Were you able to wash your hands after
using the toilet?***

***That's the awful part, you use the
toilet and then you eat with your
hands afterwards. That's also part of
feeling like an animal.***

(Prisoner)

³⁴ CPT (2018). Report to Norway, CPT/Inf (2019) 1, paragraph 109.

³⁵ Norway (2019). Response to the CPT report, CPT/Inf (2019) 22, item 55.

³⁶ Instructions for Police Custody Facilities, 25 June 2024, RPOD-2023-16, point 3: Requirements for physical design and equipment.

³⁷ UN International Covenant on Civil and Political Rights, Article 10 (1).

The acoustic conditions in the security cells were often very poor, with a strong echo from the bare concrete walls. This made communication difficult. In addition, prisoners and staff generally had to shout through plexiglass windows or through narrow inspection windows in the cell door. The acoustics and physical barriers made it difficult to establish a reassuring and constructive dialogue about ending the placement.

"It is difficult to speak with the prisoners in the security cell. I have to shout through the glass window to be heard."

(Prison officer)

The size of the security cells varied. The largest cells were around eight square metres, but some were so small that they allowed very limited movement. They were therefore unsuitable as living spaces. In the prisons in Bodø and Ullersmo, the smallest security cells measured 5.25 and 5.5 square metres respectively. In Bodø Prison the ceiling was as low as 2.1 metres.³⁸ The Parliamentary Ombud recommended that Bodø Prison should not use its security cells in their existing form.³⁹

In most of the prisons we visited, there were so-called "reinforced cells" in addition to the security cells. These were used when an ordinary cell was not considered sufficient during exclusion from association, for example to prevent repeated damage to property. There was significant variation in the design of these cells and in how intrusive they were. Generally, they were simply furnished with solid, fixed furniture, but contained more items than security cells. Unlike security cells, where prisoners must squat over a floor toilet, these cells had an ordinary toilet (often metal), sometimes separated from the rest of the cell. The reinforced cells also lacked a floor-level hatch for passing in food, drink or other items. With one exception, the cells had raised bed frames or bunks so that prisoners did not have to lie or sit on a mattress on the floor.

In Skien Prison, the management succeeded in significantly reducing the use of security cells by using such reinforced cells instead.⁴⁰ The reinforced cells in this prison had fixed beds, as well as robust furniture such as a table, chair and shelf, a metal sink and toilet, barred windows, and a light switch. They lacked loose

objects, but a television could be placed in the cell when needed, and curtains could be attached with Velcro to prevent strangulation. There were a two-way intercom and radio. The findings show that a more humane design is possible.

4.2. Conclusion

The purpose of using a security cell is to prevent serious attacks or harm to persons, to prevent the execution of serious threats, or to prevent significant damage to property. The Ombud cannot see that these purposes justify the extremely austere physical design of the security cells. Experience from other sectors shows that a safe design that prevents prisoners from harming themselves, others, or the surroundings can be achieved in less intrusive ways. Our findings from the visit to Skien Prison support this as well.

Intrusive and degrading physical conditions are among the risk factors considered in the ECtHR's overall assessment of whether the prohibition against inhuman or degrading treatment has been breached (see Chapter 3, Legal framework).

The Ombud's findings show how the design of the security cells deprives prisoners of autonomy and sensory input, and contributes to placing them in powerless and humiliating situations. This includes being served food through a hatch at floor level, having to use the toilet without any form of privacy, and being unable to maintain basic hygiene. In several prisons, the Ombud has found documentation showing that, after some time in the security cell, prisoners had urinated or smeared faeces or menstrual blood on the floor and walls, or had injured themselves by hitting or banging against the floor and walls.

These accounts cause the Ombud concern that such actions may be manifestations of distress and the harmful effects of solitary confinement. Several prisoners have, in conversations with us afterwards,

³⁸ Parliamentary Ombud, visit reports to Bodø Prison (2023) and Ullersmo Prison (2025).

³⁹ Following its visit to Norway in 2018, the CPT also expressed criticism regarding the size of the security cells in Bodø and Ullersmo, CPT/Inf (2019) 1, paragraph 108.

⁴⁰ Parliamentary Ombud, Visit Report – Telemark Prison, Skien Unit (2025).

described such behaviour as a reaction to being isolated in a security cell.

Overall, the Ombud concludes that the physical design of the security cells exposes prisoners to conditions that in themselves entail a high risk of violating Article 3 of the European Convention on Human Rights.

The Parliamentary Ombud has recommended that the Ministry of Justice and Public Security regulate the requirements for the design of security cells in law or regulation.⁴¹ This recommendation has not yet been followed up. The Ombud's findings show a need for several amendments to the minimum requirements for the design of security cells, including access to water

inside the cell, improved opportunities for communication between staff and prisoners and for ensuring healthcare supervision, direct views and natural light, more humane arrangements for food distribution and toilet use, and a place to sit.⁴²

4.3. Recommendation

- The Ministry of Justice and Public Security and the Directorate of the Norwegian Correctional Service should jointly ensure that the design of security cells is not more intrusive than necessary for the purpose. The design should safeguard prisoners' basic needs and dignity.



The security cells in Indre Østfold Prison, Eidsberg unit, are equipped as standard security cells in accordance with the Correctional Service's guidelines. Photo: Parliamentary Ombud.

⁴¹ Parliamentary Ombud's consultation statement on amendments to the Execution of Sentences Act and the Health and Care Services Act (association, exclusion and coercive measures in prisons), 15 June 2023.

⁴² Cf. the Norwegian Police Directorate, *Instructions for Police Custody Facilities*, RPOD-2023-16, point 3, which sets out detailed functional requirements for the physical design of police custody cells.

5. Prisoners who remain in security cells for extended periods

5.1. The risk of harm to health increases with the duration isolation

Solitary confinement as a coercive measure carries a high risk of harm to health

The risk of negative health effects increases the longer the isolation lasts, and the more unpredictable the situation is for the prisoner.⁴³ The physical design of security cells, involving deprivation of sensory input and degrading conditions in addition to social isolation, further increases this risk (see Chapter 4, The design of security cells).

The serious consequences of solitary confinement in a security cell mean that such placements must be ended as soon as the acute danger has been averted (see Chapter 3, Legal framework). According to the CPT, this normally means that isolation should last only minutes rather than hours. This requires strict and frequent control of the duration of isolation. From the moment a prisoner is placed in a security cell, the prison must ensure regular supervision (at least once an hour). In addition to safeguarding the prisoner's health and basic needs, a dialogue should be established as early as possible about how the placement can be ended.

The person with decision-making authority (often an operational first officer) must continuously assess whether the conditions for using a security cell are still met. The prison's health unit must be alerted immediately when a prisoner is placed in a security cell. Healthcare personnel must carry out daily supervision of prisoners, including monitoring for negative health

effects of isolation and notifying the prison if concerns arise about the prisoner's health.⁴⁴

Prisoners who are particularly vulnerable to the harms of isolation

Some prisoners are especially vulnerable to the harmful effects of isolation in a security cell, for example due to mental health challenges, intellectual disabilities, trauma, personal crises, or suicide risk. Young age also increases the risk of harm.

Isolating prisoners who are already particularly vulnerable to harm increases the risk of breaching the prohibition against inhuman or degrading treatment. The Mandela Rules recommend that the solitary confinement of prisoners with mental disorders should be prohibited where their condition is worsened by the isolation.

5.2. Isolation in security cells lasts longer than strictly necessary

The Norwegian Execution of Sentences Act does not set an absolute time limit on the use of security cells, but the prison must "continuously assess whether there are grounds for maintaining the measure".⁴⁵ All conditions for the use of a security cell must be met for as long as the placement continues. The stay in a security cell must at all times be strictly necessary to achieve the purpose of the placement, and less intrusive measures must be continuously considered. The assessments must be justified and recorded in a separate supervision log.⁴⁶ The requirement for detailed reasoning increases the longer the isolation lasts.⁴⁷

43 Parliamentary Ombud, *Special Report to the Storting on Solitary Confinement and Lack of Human Contact in Norwegian Prisons*, Document 4:3 (2018/2019), p. 26.

44 Municipalities are responsible for providing health and care services to prisoners, cf. the Health and Care Services Act, Section 3-9. Municipalities operate the health units in the prisons.

45 Section 38, final sentence of the third paragraph, of the Norwegian Execution of Sentences Act.

46 Directorate of the Norwegian Correctional Service, *Guidelines to the Execution of Sentences Act* (2008), point 38.7.4.

47 ECtHR, *Babar Ahmad and Others v. the United Kingdom*, 10 April 2012, application No. 24027/07 et al., paragraph 212.

► 1 Too infrequent assessments of whether to end the security cell placement

In most prisons, the decision was assessed by staff with decision-making authority only twice within a 24-hour period. This meant that at least twelve hours could pass between each reassessment. Using solitary confinement as a coercive measure for such lengthy periods under such intrusive conditions, without renewed assessment, makes it likely that prisoners remain isolated in a security cell longer than is strictly necessary.

In seven of the thirteen prisons, we found examples where between 17 and 30 hours had passed between each reassessment of the decision.⁴⁸ In Oslo Prison and Bredtveit Prison, there were cases where it had already been decided before 3 p.m. that the prisoner would remain in the security cell until the following day. In two prisons, there were cases where as much as 2.5 days and more than three days respectively passed without any documented assessments.⁴⁹ This is highly concerning.

It is particularly serious that very long periods elapsed between assessments in several of the longest security cell placements. In Åna Prison, for example, the average time between assessments for one prisoner who remained in a security cell for 77 hours and 24 minutes was nearly 13 hours.⁵⁰ The first assessment did not occur until 22 hours after placement. In Ringerike Prison, the average interval between assessments for a placement that lasted 63 hours was 18 hours.⁵¹ In Bredtveit Prison, the continuation of the decision for a prisoner who spent nearly ten days in a security cell was assessed only about once a day. The same was true in Stavanger Prison for a prisoner who remained in a security cell for 13 days. In several prisons, assessments were made less frequently the longer the placement continued.

The examples above demonstrate serious deficiencies. The intrusiveness of the measure and the risk of harm

increase the longer a placement lasts, and the requirement for justification correspondingly becomes more stringent.⁵² The findings in themselves reveal a significant risk that prisoners remained in a security cell for longer than permitted.

With few exceptions, none of the prisons we visited carried out assessments during the night. We found several cases in which prisoners were informed in the afternoon or evening that they would have to spend the night in a security cell. The prisons we visited stated that they did not have sufficient staffing to terminate a placement during the night shift. In some of these cases, the documentation described the prisoner as calm, making it highly doubtful whether the grounds for the placement were still present. The Ombud emphasises that it is unlawful to decide in advance that a prisoner must remain in a security cell overnight without continuous assessment of the need.

“But at night the prisoners are not let out?”

“Correct. That is due to low staffing. It is not possible to release them then.”

(Interview with security inspector)

► 2 Lack of justification for maintaining security cell decisions

The documentation of the assessments was very poor in all the prisons, making it difficult to determine whether the continuation of the placement was adequately justified. Even though the requirement for justification increases the longer the placement lasts,⁵³ we found no documented assessments that addressed all the conditions for maintaining a security cell decision. In most cases, the documentation did not show the content of an assessment, but merely a signature, a brief description of a conversation, or the restatement of a conclusion. Examples included entries made by

48 See the Parliamentary Ombud's visit reports on the prisons in Stavanger (2024), Ringerike (2024), Bredtveit (2023), Eidsberg (2023), Åna (2025), Ullersmo (2025) and Mandal (2025).

49 Parliamentary Ombud, visit reports to Ullersmo Prison (2025), p. 25, and Telemark Prison, Skien Unit (2025), p. 28.

50 Parliamentary Ombud, *Visit Report – Åna Prison* (2025), p. 25.

51 Parliamentary Ombud, *Visit Report – Ringerike Prison* (2024), p. 39.

52 ECtHR, *Babar Ahmad and Others v. the United Kingdom*, application No. 24027/07 et al., 10 April 2012, paragraph 212; ECtHR, *Khodorkovskiy and Lebedev v. Russia*, application No. 11082/06 et al., 25 July 2013,

53 ECtHR, *Babar Ahmad and Others v. the United Kingdom*, application No. 24027/07 et al., 10 April 2012, paragraph 212; ECtHR, *Khodorkovskiy and Lebedev v. Russia*, application No. 11082/06 et al., 25 July 2013, paragraph 470; ECtHR, *A.B. v. Russia*, application No. 1439/06, 14 October 2010, paragraph 108.

the staff member with decision-making authority stating simply that “he remains in the security cell” or “kicked the door. Continued.” Such notes are clearly insufficient to show why it remained strictly necessary to maintain the placement, and they did not indicate which less intrusive measures had been considered.

In other cases, the documented justifications for maintaining the decision were clearly unlawful, such as stating that there was no space in other cells.

“No one told me what I needed to do to be let out. You just have to stay there for as long as they feel like it.”

(Prisoner)

In several places, we found insufficient justifications such as “the prisoner behaved badly yesterday.” In a number of cases, it was stated that the prisoner had to apologise or acknowledge that they were to blame for being placed in a security cell.

During several visits, we found documentation indicating that prisoners in security cells were calm, or had slept for long periods, without any explanation as to why the decision nevertheless continued. In one prison, it took 13 hours from the time of placement before a staff member with decision-making authority came to speak with the prisoner. Until then, the prisoner had been described as calm and asleep. There was no documentation explaining why the placement was maintained. A further 30 hours then passed before a new assessment was documented.

We found virtually no documented examples showing that the prisons had considered whether the continued stay in a security cell was proportionate. That is, that the prisons did not describe how the stay in a security cell affected the prisoner. This was even the case when multiple placements of prisoners who had been in a security cell repeatedly, or who were suicidal, had mental health disorders, war trauma, or clear signs of harm caused by isolation. The prisons’ assessments of whether security cell placements should continue were consistently seriously deficient or entirely absent.

The prisons’ practices did not reflect the fact that the requirement for justification increases in line with the duration of the solitary confinement.

➤ 3 Supervision is not used to establish dialogue with prisoners about ending the placement

Prison officers are required to carry out regular supervision of prisoners in security cells to safeguard their health and needs. Our findings show that the prisons made little use of these supervision checks to establish a dialogue with prisoners about how the placement could be ended.

Instead, the supervision largely consisted of checking the prisoner’s condition by looking for visible signs of movement, or distributing food and drink. Supervision was mostly carried out through windows or the hatch, making normal conversation difficult (see Chapter 4.1, Intrusive and degrading physical conditions).

“Did officers come and check on you?”

“Yes, they looked at me through a window. They didn’t speak to me. My contact officer was there too, and he didn’t speak to me either. I thought that was especially tough, because he is my contact officer.”

(Prisoner)

➤ 4 Several prisoners in security cells did not receive daily supervision from healthcare personnel

According to international minimum standards, prisoners subjected to any form of isolation must be monitored daily by healthcare personnel.⁵⁴ Although this usually occurred, we found several cases where healthcare personnel did not supervise prisoners in security cells. This occurred particularly outside the opening hours of the health services (evenings/weekends). In one prison, there were two instances where prisoners had been in a security cell for more than 60 hours

⁵⁴ UN Standard Minimum Rules for the Treatment of Prisoners (the Mandela Rules), Rule 45 (2); European Prison Rules, Rule 43.2; and CPT, report following the visit to Croatia 2017, CPT/Inf (2018) 44, paragraph 60. See also Prop. 165 L (2024–2025), in which the Ministry proposes to enshrine in the Health and Care Services Act that prisoners placed in a security cell must be supervised by healthcare personnel at least once per day.

without receiving healthcare supervision.⁵⁵ In another prison, a prisoner did not receive supervision by healthcare personnel until 20 hours had passed. He was admitted to hospital.⁵⁶

In several cases, the emergency medical service (legevakt) failed to attend for supervision after receiving the prison's description of the prisoner's health condition. This included cases where prisoners had been placed in a security cell due to concerns about self-harm or suicide attempts. This is particularly serious, as such decisions undermine prisoners' right to health follow-up, and officers do not have the medical competence to assess the need for supervision.

The lack of healthcare supervision creates a risk that injuries may occur during the placement, that other health problems are not detected, and that prisoners do not receive necessary healthcare. Healthcare personnel must immediately notify the prison governor if they are concerned about the harmful effects of isolation and must advise if they consider that the placement should be terminated for health reasons.⁵⁷ They therefore have an important role in ensuring that a security cell placement is ended if the prisoner is being harmed by the isolation.

5.3. The prisons' use of security cells carries a high risk of serious human rights violations

► 1 Inadequate control of decisions results in prolonged stays in security cells

The findings above show that the prisons do not ensure the level of frequent and rigorous monitoring of security cell placements that human rights standards require.

A natural consequence of inadequate control is that most of the security cell placements we found lasted for many hours. We found few examples where a prisoner had been in a security cell for less than 12 hours, and placements often lasted around 24 hours.⁵⁸ In many cases, prisoners had been in a security cell for several days. Seven of the thirteen prisons had multiple prisoners who had spent three days or more in a security cell. Several of these placements were extremely long, lasting between four and almost six days. The longest lasted 13 days.⁵⁹ In seven of those days, the prison assessed whether the placement should be terminated only once per day. These examples demonstrate a high risk that prisoners are being isolated in security cells unlawfully for excessive periods.

One of the longest placements lasted almost ten days.⁶⁰ This concerned a female prisoner who had already had two prolonged placements lasting seven days and 16 hours, and three days and 15 hours respectively. Our review showed that the prison generally assessed the placement only once per day. Much of the communication during the prisoner's stay in the security cell appeared counterproductive: the prison repeatedly attempted to get the prisoner to admit fault for the placement and promise not to do anything upon returning to the unit. Such an approach creates a high risk that the decision will be maintained even when the prisoner's condition no longer makes the use of the coercive measure strictly necessary.

Security cell placements lasting more than three days must be approved by the regional administration in order to be continued.⁶¹ In two prisons, we found such extended placements that had not been reported to the region.⁶² In two other cases involving different prisons, there were significant shortcomings in the region's assessment of whether the conditions for maintaining the placement were met.⁶³

55 Parliamentary Ombud, *Use of Security Cells in Agder Prison, Mandal Unit* (2025), p. 23.

56 Parliamentary Ombud, *Use of Security Cells in Åna Prison* (2025), p. 21.

57 Mandela Rules, Rule 46 (2).

58 Similarly, the Parliamentary Ombud's review of figures from the Directorate of the Norwegian Correctional Service (KDI) on the use of security cells in 2024 shows that the average duration of placements was 21.4 hours. Sixty-two per cent lasted longer than 12 hours, and 27 per cent longer than one day. The longest placement lasted a full 15 days (363 hours).

59 Parliamentary Ombud, *Visit Report – Stavanger Prison* (2024), p. 39.

60 Parliamentary Ombud, *Visit Report – Bredtveit Prison and Security Institution* (2023), pp. 36–40.

61 Cf. Section 38, sixth paragraph, of the Norwegian Execution of Sentences Act, and the Directorate of the Norwegian Correctional Service's guidelines to the Act and to its Regulations, point 38.3.

62 Parliamentary Ombud, visit reports to Bredtveit Prison and Security Institution (2023), p. 37; Agder Prison, Mandal Unit (2025), p. 29; and Stavanger Prison (2024), p. 43.

63 Parliamentary Ombud, visit reports to Bredtveit Prison and Security Institution (2023), p. 39; and Stavanger Prison (2024), p. 43.

► 2 Security cells are used on prisoners who are particularly vulnerable to harm

A particularly concerning finding from the visits is that security cells are frequently used on prisoners who are especially vulnerable to the harmful effects of solitary confinement. Many of those placed in a security cell had mental health challenges, intellectual disabilities, trauma, or existing harm from isolation that was known to the prison. The Mandela Rules state that isolation of prisoners with diminished physical or mental capacity should be prohibited where their condition is worsened by solitary confinement.⁶⁴ In several prisons, we found documentation showing that prisoners' mental health had clearly deteriorated during the placement.

"This was the first time I pressed the call button to ask for help. And I haven't done it since. If I'm having a tough time in my cell now, then I just have a tough time – I don't ask for help."

Prisoner placed in a security cell after requesting a conversation because of thoughts of self-harm

risk of violating human rights. The ECtHR's case law shows that isolating prisoners at risk of suicide in a security cell can amount to a breach of the prohibition against inhuman or degrading treatment.⁶⁷ Following its visit in 2024, the CPT criticised Norwegian prisons for responding to prisoners' self-harm with the use of isolation and security cells.⁶⁸ The Committee noted that prisoners experienced this as punitive, and that self-harm often reflects underlying mental health difficulties that should be met with increased healthcare, not punitive measures such as a security cell.

Several prisoners the Ombud has spoken to said that they keep quiet when they are struggling because they fear being placed in a security cell. This can prevent open dialogue with prisoners in crisis and may result in loss of life.

Many prisoners were also young. In one prison, 37 per cent of the security cell decisions concerned young prisoners under the age of 24.⁶⁵ Figures obtained from the Directorate of the Correctional Service indicate that 27 per cent of all security cell decisions in 2024 concerned prisoners under the age of 24.

In many of the prisons, security cells were used to manage self-harm and suicide risk (see Chapter 6.2.3, Care of prisoners in crisis). In four prisons, between 70 and 80 per cent of the security cell decisions examined were justified by suicide attempts, self-harm, or expressed intentions to take one's own life.⁶⁶ Some prisoners were placed directly in a security cell after being rescued from a serious suicide attempt, without any indication that the prison had attempted to remain present, offer supportive conversations, or involve the health service.

Placing someone who has just attempted to take their own life alone in a bare concrete cell is extremely serious and may intensify their distress. This carries a high

► 3 Other serious issues

Several prisoners were placed in a security cell repeatedly over short periods, with each placement lasting several days. In some of these cases, particularly long intervals passed between assessments of whether the placement could be ended. This is especially concerning because repeated placements and prolonged isolation increase the risk of harm to health. National figures obtained from the Directorate of the Correctional Service show that 19 prisoners were placed in a security cell more than four times each in 2024.

In many cases, our visits showed that prisoners with multiple security cell placements had also been excluded from association both before the security cell stays, in the periods between them, and afterwards. In several such cases, we observed a dynamic in which challenging behaviour from the prisoner was met with increasingly intrusive security measures, which in turn increased resistance from the prisoner. An often overlooked harmful effect of isolation is difficulty regulating

64 Mandela Rules, Rule 45 (2).

65 Parliamentary Ombud, *Visit Report – Oslo Prison* (2025), p. 10.

66 See the Parliamentary Ombud's visit reports: *Ringerike Prison* (2024), p. 51; *Skien Prison* (2025), p. 21; *Trondheim Prison* (2024), p. 37; and *Bredtveit Prison* (2025), p. 48.

67 ECtHR, *Jeanty v. Belgium*, 31 March 2020, application No. 82284/17, paragraphs 119–120; ECtHR, *Keenan v. the United Kingdom*, 3 April 2001, application No. 27229/95, paragraph 116; and ECtHR, *Renolde v. France*, 16 October 2008, application No. 5608/05, paragraph 107.

68 CPT, report following the visit to Norway in 2024, CPT/Inf (2025) 03, paragraph 123.

emotions and behaviour. Prisoners who are isolated may become more easily angered or physically agitated. If staff do not understand the cause of this, the consequence may be entrenched conflict situations and disproportionate use of isolation and force.

In some prisons, we found that prisoners in security cells had been subjected to particularly concerning treatment. In Bredtveit, Trondheim and Oslo Prison, prisoners placed in security cells were deprived of the plastic mattress.⁶⁹ They were then required to lie, and in some cases sleep, directly on the concrete floor. In Bredtveit Prison, one prisoner was without a mattress for three days during a placement lasting seven days and 16 hours. The protocol noted that she “has pain in her body after lying on the floor for three days”.⁷⁰ A prisoner deprived of a mattress in Trondheim Prison had been placed in the security cell directly after a serious suicide attempt. In Oslo Prison, the mattress had been removed from the security cell on three occasions, including in one case where a prisoner was without a mattress for 39 hours and had to lie and sit directly on the concrete floor.

The Ombud has in several visit reports pointed out that it is unclear what prisoners are permitted to wear inside the cell. In Bodø Prison, a prisoner was stripped of all clothing and remained naked with only a blanket for several hours. In Mandal Prison, two prisoners were permitted only to wear a tear-resistant poncho because staff were concerned that they might take their own lives.⁷¹ In the same prison, the CPT found that a prisoner was naked in the security cell when the Committee arrived. The Committee observed that this “could be considered to amount to degrading treatment.”

In Bredtveit Prison, a prisoner had to be taken to the emergency medical service due to suspected fracture

of an arm following the use of force in the security cell.⁷² In Oslo Prison, a prisoner spent four days in a security cell with a broken hand, even though the prison knew that the hand was fractured.⁷³

In Åna Prison, one of the prisoners spent a full day in a security cell that was smeared with faeces, without being given the opportunity to wash.⁷⁴

In Stavanger Prison, a prisoner wore handcuffs with their hands behind their back for seven hours during a stay in a security cell before they were removed. The prison did not describe why the use of handcuffs remained necessary after the prisoner had been locked into the security cell.⁷⁵

In the same prison, a prisoner was first sprayed with pepper spray through the hatch in the cell door, without warning and without the prison being able to explain why it was strictly necessary. The prisoner was then handcuffed and transferred to a security cell, stripped naked from the waist down and given new underwear. The handcuffs were not removed until after three and a half hours in the security cell, and the prison could not demonstrate that the prisoner had at any point been given the opportunity to rinse or wash their face after being subjected to pepper spray.

Oslo Prison used tear gas once and pepper spray three times while a prisoner was inside a security cell.

The use of pepper spray can be dangerous, and the ECtHR has relied on CPT’s statements that pepper spray should not be used in confined spaces. CPT has explicitly stated that it should never be considered legitimate to use pepper spray through the hatch in a cell door.⁷⁶

69 Parliamentary Ombud, visit reports to Bredtveit Prison and Security Institution (2023), Trondheim Prison and Security Institution (2024), and Oslo Prison (2025).

70 Parliamentary Ombud, *Visit Report – Bredtveit Prison and Security Institution* (2023), p. 59.

71 Parliamentary Ombud, *Visit Report – Bodø Prison* (2023), p. 34, and *Agder Prison, Mandal Unit* (2025), p. 19.

72 Parliamentary Ombud, *Visit Report – Bredtveit Prison and Security Institution* (2023), p. 59.

73 Parliamentary Ombud, *Visit Report – Oslo Prison* (2025), pp. 26 and 28.

74 Parliamentary Ombud, *Visit Report – Åna Prison* (2025), p. 19.

75 Parliamentary Ombud, *Visit Report – Stavanger Prison* (2024), p. 41.

76 ECtHR, *El-Asmar v. Denmark*, 3 October 2023, application No. 27753/19; *Tali v. Estonia*, 13 February 2014, application No. 66393/10, paragraph 78.

5.4. Conclusion

The combined findings show that many prisoners remain in a security cell for longer than the law permits, and under conditions that are highly concerning. None of the prisons carried out assessments of whether the placement could be terminated with sufficient frequency, and the justifications were often severely inadequate or entirely absent. Supervision of the prisoners was not actively used to establish dialogue about ending the placement. In some cases we found serious failures in the follow-up of the prisoners' health.

When isolation is used as a coercive measure, it must be ended as soon as the acute danger has been averted. Nevertheless, most placements lasted around one day, and in several cases for many days. Security cell placements lasting several days carry a high risk of violating Article 3 of the ECHR. This applies particularly to young prisoners and to individuals with mental health challenges or suicide risk.

The risk of breaching the prohibition against inhuman treatment is also high when the same person is placed in a security cell repeatedly, excluded from association for prolonged periods, subjected to excessive physical force, handcuffs or gas, or other undignified conditions. The Parliamentary Ombud finds that the cases involving prisoners who have spent many days in a security cell, the cases where handcuffs and pepper spray were used inside a security cell, and the incidents where prisoners were deprived of a mattress for several days, all appear to constitute violations of the prohibition against inhuman or degrading treatment under Article 3 of the ECHR.

The Parliamentary Ombud has previously pointed to the need for stricter rules to ensure that security cell decisions are terminated when they are no longer strictly necessary. We have, among other things, recommended that the Ministry of Justice and Public Security clarifies in the legislation that the conditions for using a security cell must be met throughout the entire period the coercive measure is applied.⁷⁷

The Ministry has followed this up in its proposal for legislative amendments on solitary confinement and

coercive measures, presented in autumn 2025 (Prop. 165 L (2024–2025)).⁷⁸ To strengthen oversight, the Ministry also proposes that a new decision must be made no later than within 24 hours if the conditions are still met.⁷⁹ This requirement is not intended to affect the Correctional Service's duty to continuously assess and document whether there are still grounds for maintaining the placement in a security cell.

The Ombud's serious findings indicate that the Ministry should issue additional regulations to ensure that prisons comply with their duty to continuously assess whether the use of a security cell is strictly necessary. Our findings largely correspond with the description of solitary confinement in security cells in the Ombud's special report from 2019. Then, as now, the main findings showed that inadequate control of decisions resulted in prolonged placements, and that security cells were used on prisoners who were particularly vulnerable to the harmful effects of such placements. The fact that these challenges remain significant highlights the need to amend the regulatory framework and strengthen governance in this area.

Both the Ombud's findings and human rights standards show the need for measures that clarify the prisons' duty to carry out thorough, continuous and reviewable assessments. The Ombud has recommended that prisons ensure that such assessments are documented at least every six hours.

5.5. Recommendation

- The Ministry of Justice and Public Security should issue further regulations on how prisons are to ensure that stays in security cells do not last longer than strictly necessary. The regulations should include minimum requirements for the content of continuous assessments of the decision and how often these must be documented. The Directorate of the Norwegian Correctional Service should issue more detailed guidelines to ensure implementation at prison level.

⁷⁷ Parliamentary Ombud's consultation statement on the proposed amendments to the Execution of Sentences Act and the Health and Care Services Act, 15 June 2023.

⁷⁸ The legislative proposal, p. 172, proposed new Section 38, third paragraph.

⁷⁹ The legislative proposal, p. 173, proposed new Section 38c, fifth paragraph

6. Preventing the use of security cells

6.1. The use of security cells must be prevented

The use of security cells involves a risk of violating the prohibition against torture and inhuman or degrading treatment. It is therefore important that prisons work in a long-term and systematic way to prevent situations that could result in the use of a security cell.

Preventing the use of security cells can be described as systematic measures to reduce the risk of future use. This requires targeted efforts to identify situations that may lead to the use of a security cell, and to implement measures to prevent such situations from arising – rather than merely reacting afterwards to rule violations.

The knowledge base on effective measures for preventing the use of security cells in prisons is limited. In a Norwegian study of prisoners who had experienced placement in a security cell, they were asked what they believed were important measures to prevent situations that end with the use of a security cell. The prisoners particularly emphasised close follow-up by officers and healthcare personnel, more activities outside the cell, and less use of exclusion from association in response to acting out.⁸⁰

Research and investigations from other institutional sectors can also help point to important factors.⁸¹ Key areas for preventing the use of force include leadership and organisation, activity provision, participation, competence and training, staffing, the physical environment, staff support, risk assessments, culture and attitudes.

Several important preventive measures against the use of force and isolation – such as adequate staffing and appropriate physical facilities – depend on the resources available to the prison. Our prison visits have documented that many prisons do not have the framework conditions necessary to provide prisoners with a daily regime that includes a satisfactory level of social contact and activity.⁸² Extensive lock-up and de facto isolation increase the risk of conflict and unwanted incidents that may lead to the use of security cells.⁸³

6.2. Knowledge and training

The regulatory framework for the use of security cells

Good knowledge of the legal framework is a prerequisite for the lawful use of security cells. Our review of decisions and logs from the period 2023–2025 shows that such knowledge within the prisons is inadequate.

In contrast to some other types of decisions in the correctional services, decisions concerning security cells are rarely written by legal professionals, and there is limited legal quality control.⁸⁴ Decisions on coercive measures are normally made by a senior prison officer.

Several decisions were wholly or partly justified on grounds that do not constitute a lawful basis for the use of a security cell. Examples included a lack of available exclusion cells, noise and disturbance from the prisoner, the prisoner being intoxicated, or that there was a need to conduct a search. In some of these decisions, the use of a security cell appeared to be unlawful.

80 Stang, J. & Østberg, B. (2006). *Prisoners' proposals for preventing isolation in security cells*. *Tidsskrift for Norsk psykologforening*, 43, 30–33.

81 See, inter alia, Norwegian Official Report (NOU) 2019:14 The Coercion Reduction Act, Chapter 11, relevant national and international knowledge on preventing the use of coercion, pp. 274–284.

82 Parliamentary Ombud, *Special Report to the Storting on Lock-up and de facto Isolation in Prisons*, Document 4:1 (2024/25), pp. 41–42.

83 Parliamentary Ombud, *Special Report 2025*, p. 35.

84 The Directorate of the Norwegian Correctional Service's guidelines to the Execution of Sentences Act (2008) provide clear instructions on internal control for decisions on exclusion from association, but not for decisions on the use of coercive measures; cf. KSF-2008-9001.

Descriptions of the prisoner's behaviour in the decisions were often phrased in vague terms such as "acting out", "threatening", or "agitated", making the decisions difficult to review. Many decisions did not describe less intrusive measures, or referred to "attempts at dialogue" without explaining what this entailed.

A security cell may only be used to prevent imminent serious incidents, yet in some cases it appeared to be used as punishment for unwanted behaviour.

Assessments of proportionality and the prisoner's vulnerabilities were almost entirely absent, even in cases involving young prisoners, prisoners who self-harmed or were at risk of suicide, or prisoners with mental health challenges. The prisons' documentation of whether and why a security cell placement could be continued had serious shortcomings (see Chapter 5, Prisoners who remain in security cells for extended periods). Several staff members seemed to require conditions for releasing a prisoner from a security cell that indicated a lack of understanding of the legal requirements, such as requiring the prisoner to apologise or promise not to harm themselves.

What made them let you out?

That I said sorry. I asked one of the officers who gave me food what I needed to do to get out. He said I had to apologise, and then he left. And after a couple of hours, I apologised. I didn't understand what I had done wrong, but I realised that I had to say sorry in order to get out.

(Prisoner)

In Skien Prison, the management had worked systematically to strengthen staff knowledge of the legal

framework, including the strict conditions for using a security cell and the duty to attempt less intrusive measures.⁸⁵ This was one of several important initiatives that contributed to the prison achieving a substantial reduction in the use of security cells within a short period.

I said again, "Calm down, you're getting irritated, and so am I. Go out and leave the door open if you want." He didn't want to; he went further into the cell and started touching my things. We both became more tense and irritated with each other. [...] It turned into a scuffle; they took me to the ground and put handcuffs on me.

Prisoner describing the events leading up to the placement in a security cell

Communication and conflict prevention

Training in approaches to preventing conflict is important for reducing the use of coercive measures. This is emphasised in the Mandela Rules, by the UN Special Rapporteur on Torture, and by the CPT following its visit to Norway in 2024.⁸⁶

During several visits, we found examples of situations where the actions of staff appeared to have contributed to conflict and the subsequent use of a security cell. In one prison, a prisoner had swung at an officer who was standing in the doorway of the cell. Instead of closing the door, the officer entered the cell and pushed the prisoner onto the bed. The prisoner pushed back, and was then taken to the ground, dragged out of the cell and placed in a security cell.⁸⁷

We found several situations where staff contributed to conflict by insisting on continuing conversations with prisoners who indicated that they wanted to be left alone.⁸⁸ Such approaches indicate low awareness that high stress levels can make a person less receptive to

⁸⁵ Parliamentary Ombud, *Visit Report – Telemark Prison, Skien Unit* (2025).

⁸⁶ Mandela Rules, Rules 38.1 and 76 (c); UN Special Rapporteur on Torture, Annual Report to the UN General Assembly, 9 August 2013, A/68/295, paragraph 57; CPT, report following the visit to Norway 2024, CPT/Inf (2025) 3, paragraph 85. See also *Essex Paper 3: Initial guidance on the interpretation and implementation of the Nelson Mandela Rules*, p. 79.

⁸⁷ Parliamentary Ombud, *Visit Report – Oslo Prison*, 10–12 February 2025, pp. 31–32.

⁸⁸ See, inter alia, Parliamentary Ombud, *Visit Report – Åna Prison*, 10–12 March 2025, pp. 30–31.

boundary-setting. A calm and attentive approach can help de-escalate the situation.⁸⁹

Several of the situations suggested a lack of training in conflict-reducing communication, particularly in relation to people with trauma.

Language barriers and the failure to use interpreters to prevent misunderstandings, insecurity and conflict situations also appeared in several cases to have contributed to the use of security cells.⁹⁰ This is serious.

In Skien Prison, our findings showed that staff often approached frustrated or distressed prisoners without confrontation or correction.⁹¹ Such an approach helped prevent situations from escalating and reduced prisoners' stress and distress. This contributed to a marked reduction in decisions to use security cells.

Care for prisoners in crisis

In the prisons we visited, suicide risk and self-harm were common grounds for using a security cell. In several prisons, this represented a significant proportion of all the decisions we reviewed (see Chapter 5.3, The prisons' use of security cells carries a high risk of serious human rights violations).

When the state has deprived someone of their liberty, it has an increased responsibility to protect them.⁹² In the case of *Haugen v. Norway* (2024), which concerned a prisoner who took his own life, the ECtHR held that Norway had violated Article 2, the right to life.⁹³ The high risk of inhuman treatment resulting from isolating prisoners due to suicide risk means that prisons must have alternative ways of caring for prisoners in crisis. Our findings show that many prisons struggle to support prisoners in serious life crises without resorting to intrusive security measures.⁹⁴ Following its visit in

2024, the CPT criticised Norwegian prisons for a security-driven, punitive approach towards prisoners who self-harm, by placing them in security cells.⁹⁵

In two prisons, prisoners were placed in a security cell only minutes after a suicide attempt had been averted, or after asking to speak with someone due to thoughts of self-harm. There was no indication that the prisons had attempted to offer supportive measures or alternative options.⁹⁶

What do you think about placing prisoners at risk of suicide in a security cell?

I don't think it is good for the prisoner. If they are thinking about harming themselves, there are many ways to prevent it. If they are suicidal, we must consider whether they should be admitted to hospital.

(Healthcare staff member)

In one prison, we found reports describing an officer shouting "you're bloody well not getting away with this" and "stop behaving like an idiot" at a prisoner who had self-harmed.⁹⁷ Another prisoner who had self-harmed was immediately confronted with a compensation claim for damage to items in the cell.

The Ombud has emphasised that prisons should strengthen their efforts to find alternative ways of supporting prisoners at risk of suicide, such as closer follow-up through conversations and physical activity, contact with clergy, healthcare personnel and relatives.

89 Fransson, E., Gaarder, S. and Lundeberg, I.R. (Eds.). (2025). *Children, Young People and the Execution of Sentences*. Cappelen Damm Academic. pp. 301, 303 and 308.

See also the Norwegian Directorate of Health (2021). *National Professional Guidelines for Preventing Coercion in Adult Mental Health Care*, Part 3 [online]. (Last updated 14 December 2021, accessed 22 September 2025). Available from: <https://www.helsedirektoratet.no/faglige-rad/tvang-forebygging-av-tvang-i-psykisk-helsevern-for-voksne>

90 See, inter alia, Parliamentary Ombud, *Visit Report – Oslo Prison* (2025), p. 32; *Trondheim Prison and Security Institution, Nermarka Unit* (2024), p. 38; and *Halden Prison* (2023), p. 38.

See also Parliamentary Ombud, *Use of Interpreters in Prisons*, thematic report 2025.

91 Parliamentary Ombud, *Visit Report – Telemark Prison, Skien Unit*, pp. 13–15.

92 ECtHR, *Rooman v. Belgium* (Grand Chamber), 31 January 2019, application No. 18052/11, paragraph 143.

93 ECtHR, *Haugen v. Norway*, 15 October 2024, application No. 59476/21.

94 See Parliamentary Ombud, *Suicide and Suicide Attempts in Prison – An Investigation under the OPCAT Mandate* (2022).

95 CPT, report following the visit to Norway in 2024, CPT/Inf (2025) 03, paragraph 123.

96 Parliamentary Ombud, visit reports to *Trondheim Prison and Security Institution, Nermarka Unit* (2024), p. 38, and *Åna Prison* (2025), p. 15.

97 Parliamentary Ombud, *Visit Report – Romerike Prison, Ullersmo Unit*, 5–6 February 2025.

It is the prison's responsibility to ensure ongoing cooperation with the health services and other actors who can help care for prisoners in such situations in a compassionate and professionally sound manner.

In Skien Prison, the management had made major changes to how they worked with prisoners who self-harmed or were at risk of suicide.⁹⁸ We observed several cases involving prisoners with serious ongoing self-harm who were taken out of their cell to spend time with officers outdoors or in a communal room instead of being placed in a security cell. This contributed significantly to the prison's substantial reduction in the use of security cells and security beds.

6.3. Systematic evaluation

An important preventive measure is for the prison to review and evaluate incidents in which a security cell has been used. A key purpose is learning and increasing knowledge about how similar situations can be prevented in the future.⁹⁹ Evaluation is particularly important in cases involving extensive or repeated use of force and coercion.

A consistent finding was that the prisons we visited did not carry out systematic evaluations of their use of coercive measures. With few exceptions, there were no routines in place that allowed staff to discuss and review incidents involving intrusive coercive measures such as security cells. Such reviews can help strengthen knowledge and reflection about alternatives to the use of force. It was particularly concerning that we found no reviews in cases involving prolonged or repeated use of security cells on individual prisoners.

The CPT has criticised the lack of reviews of incidents involving coercive measures in prisons and has recommended that such reviews be carried out routinely.¹⁰⁰ The rules on coercive measures in the Execution of Sentences Act do not contain a specific obligation to conduct systematic evaluation of incidents. At the

same time, the Correctional Service is subject to internal control requirements designed to ensure compliance with legislation, learning and improvement.

A system for evaluation should also include offering a conversation with the person subjected to the coercive measure. The purpose of such conversations should be to provide a basis for learning, preventing new incidents and identifying alternatives to the use of force. The CPT has recommended that prisoners be offered such conversations after coercive incidents in prisons.¹⁰¹

Offering these conversations to prisoners, like the review of incidents among staff, is not set out in law.¹⁰² None of the prisons we visited had any practice of systematically gathering prisoners' perspectives in this way. However, some prisons have begun offering such conversations as follow-up to our recommendations.

6.4. Management must prevent the use of security cells

Both research and the Ombud's findings from other institutional sectors show that management plays a crucial role in ensuring that coercive measures are prevented.¹⁰³

Management must closely monitor the use of coercion, express clear ambitions to reduce its use, and provide direction on how practices should be changed to achieve this.

One of our visits clearly demonstrated how targeted prevention work can have an effect. During a period after Skien Prison was converted at short notice into a women's prison in 2023, the prison had the highest figures for the use of security cells and security beds of all prisons in Norway. This changed after the summer of 2024. When the Parliamentary Ombud visited the prison in spring 2025, it had almost completely stopped using these coercive measures.

⁹⁸ Parliamentary Ombud, *Use of Security Cells in Telemark Prison, Skien Unit*, pp. 21–22.

⁹⁹ An evaluation is not the same as a debrief or structured staff follow-up after stressful incidents (SEB). These are also important measures, aimed at safeguarding staff.

¹⁰⁰ CPT, report following the visit to Ireland, CPT/Inf (2025) 22, paragraphs 53–57.

¹⁰¹ CPT, report following the visit to Spain (2018), CPT/Inf (2020) 5, paragraph 53.

¹⁰² In mental health care, this is set out in law; cf. the Mental Health Care Act, Section 4-2.

¹⁰³ See, inter alia, Norwegian Official Report (NOU) 2019:14 *The Coercion Reduction Act*, Chapter 11.2.1.2, relevant national and international knowledge on preventing the use of coercion, pp. 274–284. See also *Parliamentary Ombud's Annual Report 2016, Institutional Culture and Leadership as Risk and Protection Factors*.

Our findings suggest that the decline was linked to measures introduced by the prison's management and staff responsible for the use of security cells and security beds. This took place in close cooperation with the prison's health service and the specialist health service, together with external stakeholders such as SIFER and RVTS.¹⁰⁴

The prison described how it had changed its approach to managing negative incidents that previously would have led to the use of a security cell or security bed. The prison still housed prisoners with extensive challenges, and the number of incidents had not necessarily decreased. Nevertheless, we found that the prison responded to prisoners with less intrusive measures. Our findings showed that the prison's approach helped reduce stress and distress and defuse frustrated prisoners, rather than escalating situations.

The document review carried out in connection with the visit supported the finding that serious incidents in the prison were largely resolved by means other than security cells and security beds. For example, there were several cases of prisoners with serious ongoing self-harm who were taken out of their cell to spend time with officers outdoors or in a communal room instead of being placed in a security cell.

To achieve the goal of reducing the use of security cells and security beds, the management had changed the training provided on coercive measures. This had increased staff knowledge of the legal framework and strengthened their understanding of how to support prisoners in crisis.

The prison also changed its routines between shifts to allow more time for staff to exchange experience. In addition, the prison hired a specialist psychologist to guide staff in their daily work and support them when facing demanding situations and in the aftermath of difficult incidents.

Two further factors also appeared to have been important in reducing the use of security cells and security beds. First, the prison's resource and staffing situation was relatively good. This meant that staff had greater opportunity to be present and look after the prisoners, and to offer association and meaningful activities.

Second, the prison had established four reinforced cells (see Chapter 4.1, Intrusive and degrading physical conditions) designed to reduce opportunities for self-harm and which, to a large extent, could replace the need for a security cell in such situations.

6.5. Conclusion

Very few of the prisons visited worked systematically to prevent the risk of using security cells. Beyond general activity and relational work, we found little willingness within the prisons to critically examine how their own practices affected the use of coercive measures. Common explanations for high levels of coercion were factors outside the prisons' control, such as having particularly challenging prisoners or a lack of resources.

Our findings show a lack of knowledge in the prisons about the legal framework governing the use of coercive measures. Although training forms part of officer education, there is a need for additional training initiatives. The Ombud calls for specific training measures directed at management and staff responsible for making such decisions, preferably at the local level.

Staff communication in several cases contributed to increased conflict and use of security cells that could have been avoided. A widespread and serious problem is that prisoners who self-harm, or who express thoughts of taking their own life, are placed in a security cell. The findings demonstrate the need for improved training in de-escalating communication and alternative ways of caring for prisoners at risk of suicide.

Prisons generally do not carry out systematic evaluations of incidents that have led to the use of a security cell—neither among staff nor with prisoners who have experienced such measures. Systematic evaluation is not set out in law, but is recommended by the CPT. In the child welfare, health and care sectors, there are statutory duties to evaluate the use of coercion.¹⁰⁵ The Execution of Sentences Act lacks such provisions. The Ombud has previously recommended introducing a statutory requirement to evaluate the use of coercive measures as soon as possible after the measure has

¹⁰⁴ SIFER is a national network of specialist competence centres in security, prison and forensic psychiatry. RVTS are the regional resource centres on violence, traumatic stress and suicide prevention.

¹⁰⁵ Child Welfare Act, Section 10-4, second paragraph; Health and Care Services Act, Sections 9-4 cf. 9-3; and Mental Health Care Act, Section 4-2, second and third paragraphs.

ended.¹⁰⁶ This recommendation has not yet been followed up.¹⁰⁷

The prison's management plays an important role in ensuring that staff are able to handle challenging situations without using coercion, or by using less intrusive alternatives. Findings from visits to other sectors, as well as research, underline that management has a crucial role in preventing the use of coercion.¹⁰⁸

The significant reduction in the use of coercive measures at Skien Prison is an example of how systematic work to prevent the use of coercive measures in prisons can have a substantial effect. The prison had implemented measures to increase knowledge of the legal framework, strengthen the exchange of experience, develop alternatives to the security cell, and improve ways of responding to prisoners in situations of stress or crisis. The prison achieved this without new resources, and with the same staff and prisoners as before.

Measures to prevent the use of security cells at the local level are not sufficient. At the national level, legislation, financial frameworks and other instruments

must contribute to ensuring that the use of security cells is not employed more than strictly necessary.

The Parliamentary Ombud has previously recommended introducing a statutory duty, in law or regulation, to prevent isolation in prisons.¹⁰⁹ The Ombud highlighted, among other things, the need for clearer guidance from the legislator on what the duty to prevent isolation entails.¹¹⁰ In autumn 2025, the Ministry of Justice and Public Security proposed several legislative amendments concerning the rules on isolation in prisons, including a purpose provision stating that prisons must prevent solitary confinement.¹¹¹ The Ministry's proposal provides too little guidance to prisons on how they are to work to prevent solitary confinement.

6.6. Recommendation

- The Ministry of Justice and Public Security and the Directorate of the Norwegian Correctional Service should introduce measures to ensure that prisons work systematically to prevent the use of coercive measures and solitary confinement.



¹⁰⁶ Parliamentary Ombud's consultation statement on amendments to the Execution of Sentences Act and the Health and Care Services Act (association, exclusion and coercive measures in prisons), 15 June 2023.

¹⁰⁷ Prop. 165 L, *Amendments to the Execution of Sentences Act, etc. (Isolation in Prisons)*.

¹⁰⁸ See, inter alia, Norwegian Official Report (NOU) 2019:14, Chapter 11, relevant national and international knowledge on preventing the use of coercion, pp. 274–285.

¹⁰⁹ Parliamentary Ombud, *Special Report on Solitary Confinement and the Lack of Human Contact in Norwegian Prisons* (2019), pp. 82–87.

¹¹⁰ Parliamentary Ombud, consultation statement on amendments to the Execution of Sentences Act and the Health and Care Services Act (association, exclusion and coercive measures in prisons), 15 June 2023.

¹¹¹ Prop. 165 L (2024–2025). See proposed new Section 2, second paragraph (p. 171).



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