**MINISTERS' DEPUTIES** Decisions **CM/Del/Dec(2026)1563/H46-22** 11 June 2026

# 1563rd meeting, 9-11 June 2026 (DH)

## H46-22 Lavorgna v. Italy (Application No. 8436/21)

Supervision of the execution of the European Court's judgments

Reference document

CM/Notes/1563/H46-22

*Decisions*

The Deputies

1. recalled that this case concerns the prolonged use of mechanical restraint on the applicant in October 2014 during his confinement in a psychiatric hospital ward, and the ineffective investigations into his allegations of ill-treatment;

*As regards individual measures*

2. noting that the just satisfaction has been paid and the applicant discharged, invited the authorities to supplement the information provided with an assessment by the competent judicial authorities as to whether fresh criminal investigations into the applicant's allegations of ill-treatment are possible;

*As regards general measures*

3. emphasised that preventing similar violations requires ensuring that mechanical restraint is applied in compliance with the Convention standards, as reflected in the case-law of the Italian Court of Cassation; considered that uniform application depends on clear guidelines, adequate training for medical staff, and effective monitoring;

4. welcomed the adoption in 2025 by the State-Regions Permanent Conference of guidelines for overcoming the use of mechanical restraint in mental health care facilities, providing for national standards, data collection, and targeted staff training; invited the authorities to ensure timely and effective implementation of these guidelines and to keep the Committee informed of the measures taken, progress achieved, and financial resources allocated;

5. noted with satisfaction the funding allocated in 2026 for the developing a data collection system on the use of mechanical restraint, as a valuable tool for effective monitoring and analysis; invited the authorities to secure the timely completion of this process and inform the Committee of the progress achieved;

6. recalled the importance of stringent procedural safeguards associated with the use of mechanical restraint, given the vulnerability of psychiatric patients; invited the authorities to provide comprehensive information on available safeguards, in particular on decision reviews and avenues to challenge them and report possible abuses;

7. noted with interest the good practices developed in several regions to minimise or overcome the use of mechanical restraint and to ensure effective safeguards; encouraged the authorities to draw on these positive examples and invited them to provide information on the above questions by 30 March 2027.