

Police Violence and Impunity in Georgia

In Georgia, across protest cycles from 2019 to 2026, a consistent pattern has emerged: disproportionate and at times prohibited force against demonstrators; systematic reclassification of allegations of torture and ill-treatment as lesser offences; abolition of the only independent investigative body mandated to investigate crimes committed by law enforcement officials; state honours awarded to internationally sanctioned law enforcement officials; and sustained denial of effective remedies to victims.

The decisions, judgments and assessments of international human rights bodies collectively establish the legal and factual context against which the persistent challenges within Georgia's law enforcement system must be assessed.¹

I. A Persistent Pattern: Police Violence Across Protest Cycles and beyond (2019–2026)

2019: Gavrilov's Night and the Failure of Accountability

The December 2025 Grand Chamber judgment of the European Court of Human Rights, concerning the dispersal of the 20–21 June 2019 protests known as "Gavrilov's Night," confirmed the systemic ineffectiveness of Georgian investigative authorities in responding to police violence.² Six years on, meaningful accountability remains absent.

Despite the severity of injuries sustained during and after June 2019, accountability has been largely absent. Criminal proceedings against several lower-ranking officers were later discontinued under amnesty measures, while no senior officials responsible for planning, authorising, or supervising the operation have been held accountable. The then-Minister of Internal Affairs, Giorgi Gakharia, was subsequently promoted to Prime Minister, and only in November 2025 was charged in absentia in connection with the June 2019 dispersal — a development that has been criticized by domestic and international observers as politically motivated.³

The structural deficiencies identified by the Court persist across subsequent protest cycles, raising serious concerns about Georgia's compliance with its obligations under the European Convention on Human Rights and its commitments as a member of the Council of Europe.

2023: Disproportionate Force Against Protesters

¹ On 9–11 June 2026, the Committee of Ministers of the Council of Europe called on Georgia to revise its freedom of assembly legislation and ensure a fully enabling environment for civil society, following supervision of the Makarashvili and Others v. Georgia judgment. See Committee of Ministers, Makarashvili and Others v. Georgia (Application No 23158/20), CM/Del/Dec(2026)1563/H46-14, Decisions of the Ministers' Deputies, 1563rd meeting (DH), 9–11 June 2026, adopted 11 June 2026, available at [https://hudoc.exec.coe.int/eng/?i=CM/Del/Dec\(2026\)1563/H46-14E](https://hudoc.exec.coe.int/eng/?i=CM/Del/Dec(2026)1563/H46-14E); and Council of Europe Commissioner for Human Rights, Memorandum on Georgia: Council of Europe Commissioner Calls for Accountability of Law Enforcement and Expresses Concerns Regarding Mounting Restrictions on Democratic Freedoms, Strasbourg, 19 June 2026, following the Commissioner's visit to Georgia in April 2026, paras 9-10, available at <https://rm.coe.int/memorandum-on-georgia-on-accountability-of-law-enforcement-and-freedom/48802c0ac8>

² EHRAC, Gavrilov's Night – landmark judgment finds Georgian protestors and journalists suffered ill treatment, 11 December 2025, available at https://ehrac.org.uk/en_gb/gavrilovs-night-european-court-judgment-georgia-protestors-journalists/

³ Civil.ge, "Ex-PM Gakharia Charged in Absentia Over 'Gavrilov's Night,' Chorchana Tensions", 12 November 2025, available at <https://civil.ge/archives/710537>

During demonstrations against the proposed "foreign agents" law in March 2023,⁴ riot police deployed tear gas, water cannons, and stun grenades against protesters outside Parliament. At least 169 people were arrested, with the majority alleging police beatings and ill-treatment during or following their detention. Reportedly, one person suffered permanent loss of sight after being struck by a rubber bullet.⁵ To date, based on available reports, the authorities have not acknowledged responsibility for this injury or to investigate complaints of violence and ill-treatment arising from these events.

2024: Documented Abuse and Alleged Prohibited Agents

Civil society organisations, journalists, and international observers extensively documented police violence against peaceful demonstrators and journalists throughout 2024.⁶ Reports describe beatings during arrests, degrading treatment in detention, sexualised and verbal abuse, unlawful searches, confiscation of personal belongings, and the use of riot-control weapons including tear gas, pepper spray, and water cannons—frequently corroborated by video evidence and accompanied by serious injuries.⁷

On 1 December 2025, more than one year after the violent dispersal of protests in November-December 2024, BBC Eye Investigations published a journalistic inquiry alleging the use of chemically laced water cannons (containing Camite) against protesters during the 2024 dispersals, supported by testimonies from injured individuals.⁸ The State Security Service opened a criminal investigation but closed it within five days, concluding that prohibited substance Camite had not been used. Simultaneously, the Service opened criminal investigation into whether those interviewed had “assisted a foreign organisation in hostile activities”.

In line with no investigation into police violence, this response raised serious concerns regarding the transparency, independence and impartiality of the investigation and its compatibility with Georgia's obligations to conduct effective investigations into allegations of torture and ill-treatment.⁹

Systemic Investigative Failures

Across the 2019–2026 period, investigations into police violence have been consistently and improperly downgraded. Rather than being pursued as cases of torture or inhuman treatment under the relevant criminal

⁴ In March 2023, the Georgian Dream political party initially passed the first reading of a bill forcing organizations receiving over 20% of their funding from abroad to register as “agents of foreign influence”. Following massive street protests in Tbilisi and widespread international criticism, the ruling party officially withdrew the package only re-introducing and adopting it in 2024.

⁵ RFE/RL, Another Eye Lost at a Protest, Demonstrations with Blank White Sheets, and a March Against Hunger, 27 December 2023, available at <https://www.radiotavisupleba.ge/a/%E1%83%A1%E1%83%90%E1%83%9E%E1%83%A0%E1%83%9D%E1%83%A2%E1%83%94%E1%83%A1%E1%83%A2%E1%83%9D-%E1%83%92%E1%83%90%E1%83%9B%E1%83%9D%E1%83%A1%E1%83%95%E1%83%9A%E1%83%94%E1%83%91%E1%83%98-2023-%E1%83%AC%E1%83%94%E1%83%9A%E1%83%A1/32749092.html> [GEO]

⁶ Rzebyk, Patrycja (2026), OSCE Fact-Finding Mission on Georgia (2026) under Paragraph 12 of the Moscow Mechanism: Report on Developments in Georgia in Respect of Human Rights and Fundamental Freedoms since Spring 2024, Organization for Security and Co-operation in Europe (OSCE), Office for Democratic Institutions and Human Rights (ODIHR), 24 February 2026, paras. 126, 128, 130-131, 133, 135, 139-142, 144, 151, 293, 300, and 304.

⁷ Public Defender of Georgia, Annual Report on the Situation of Human Rights and Freedoms in Georgia – 2024, pgs. 77-95, available at <https://ombudsman.ge/res/docs/2025040121291438156.pdf> [GEO]

⁸ BBC, ‘WW1 toxic compound sprayed on Georgian protesters, BBC evidence suggests’, 1 December 2025, available at <https://www.bbc.com/news/articles/czrk7g50e1po>

⁹ Interpressnews, ‘State Security Service - Since the investigative actions on the fabricated fact of the use of the so-called "camite" are over, the investigation continues into a possible crime of assisting a foreign organization in hostile activities’, 06 December 2025, available at <https://www.interpressnews.ge/en/article/144446-state-security-service-since-the-investigative-actions-on-the-fabricated-fact-of-the-use-of-the-so-called-camite-are-over-the-investigation-continues-into-a-possible-crime-of-assisting-a-foreign-organization-in-hostile-activities/>

provisions, complaints are routinely reclassified as “abuse of authority,” a classification that carries lesser penalties and risks undermining the level of accountability required by the European Convention on Human Rights. Perpetrators are rarely identified; victims are frequently denied proper legal status or effective remedies; and systemic investigative inaction reinforces an entrenched culture of impunity.

The 2024 annual report of the Ombudsperson of Georgia provides critical quantitative evidence of systemic failure. Physical methods of violence documented against individuals in police custody include punching, kicking, tightening of handcuffs, arm-twisting, and forcible restraint. The proportion of cases involving reported injuries has risen to 39.4% - the highest recorded figure across the reporting period from 2020 to 2024, during which the rate fluctuated between 26% and 34.4%. Far from improving, the data indicates a deteriorating trajectory.¹⁰

During the 2024–2025 protests in Georgia, the Public Defender documented severe human rights violations. Of the 624 detainees visited by the Public Defender's office, 360 individuals (57.7%) reported being subjected to inhuman or degrading treatment or excessive use of force by law enforcement. Most notably in April–May 2024 and November 2024–March 2025, reported abuse rates among detainees surged to as high as 60%. The Public Defender also highlighted a persistent failure to effectively investigate allegations of ill-treatment by state agents, pointing to critical gaps in preventive safeguards, including inadequate audio-video monitoring and the absence of clear officer identification.¹¹

Accountability Deficits in Law Enforcement Oversight

In January 2025, eleven senior officials of the Ministry of Internal Affairs, including individuals subject to international sanctions for human rights violations, were awarded state honours for their “special contribution to strengthening law and order,” at the request of Prime Minister Irakli Kobakhidze and Parliament Speaker Shalva Papuashvili.¹² The Prime Minister further announced that the State would fully compensate any officials suffering financial losses as a result of sanctions.¹³ These actions send a strong signal of institutional endorsement of conduct that has been internationally condemned, and are incompatible with Georgia's international obligations to prevent and deter violations.

The structural context has deteriorated further. In May 2025, the Georgian Parliament abolished the Special Investigation Service—established in March 2022 following European Union recommendations specifically to investigate crimes committed by law enforcement officers and public officials. With effect from 1 July 2025, its mandate was transferred to the Tbilisi Prosecutor's Office, an institution that is not independent of the executive and that is part of the law enforcement system it would be required to scrutinise.¹⁴

According to the 2025 annual report of the Prosecutor's Office of Georgia, authorities launched investigations into 196 criminal cases of alleged ill-treatment committed by public officials. Of these, 121 cases involved police officers, 7 occurred in penitentiary institutions, 5 involved court bailiffs, and 1 case involved both, with victim

¹⁰ Public Defender of Georgia, Annual Report on the Situation of Human Rights and Freedoms in Georgia – 2024, pg. 45, available at <https://ombudsman.ge/res/docs/2025040121291438156.pdf> [GEO]

¹¹ Ibid, pgs. 9, 78, 84, and 88

¹² Imedi TV, Mikheil Kavelashvili awarded Vakhtang Gomelauri and other senior police officials the Order of Honor, 30 January 2025, <https://imedinews.ge/ge/politika/371839/mikheil-kavelashvilma-vakhtang-gomelauri-da-politsiis-skhva-khelmdzgvaneli-pirebi-girsebis-ordenit-dajildova> [GEO]

¹³ Civil.ge, GD President Awards Sanctioned MIA Officials with Order of Honor, 30 January 2025, available at <https://civil.ge/archives/657740>; Irakli Kobakhidze Snubs US Sanctions by Decorating, Compensating Sanctioned MIA Officials (20 December 2025), available at <https://civil.ge/archives/646989>

¹⁴ Democracy Research Institute, DRI: Georgian Dream against the interests of the country and its attempt to destroy state institutions, 21 May 2025, available at <https://www.democracyresearch.org/eng/1643/>

status granted to 74 individuals. Notably, prosecution was initiated in only 6 out of 196 cases — a figure that speaks to the scale of alleged impunity of ill-treatment in Georgia.¹⁵

2025–2026: Continued Violence and Institutional Deterioration

In May and June 2026, video footage circulated on social media revealed further instances of torture and inhuman treatment committed by police officers. One incident, involving events from 2022, resulted in the arrest of the involved individuals only in February 2026—four years after the fact on charges of abuse of power involving violence.¹⁶ A separate video showed at least ten police officers beating a man over an alleged parking dispute in Gori.¹⁷ Following public outcry, six officers were charged, but again, only with “abuse of power with the use of violence”

On 7 May 2026, Georgia's Prosecutor General's Office arrested five current and former law enforcement personnel for using violence against protester Zviad Maisashvili, politician Levan Khabeishvili, and journalist Guram Rogava during the 2024 Tbilisi protests. In this case, despite the grave nature of the assault, documented by multiple sources, authorities charged the alleged perpetrators with “abuse of power with the use of violence”. In addition, one of them was charged with “unlawfully obstructing a journalist's professional activities resulting in harm to health or other serious consequences.”¹⁸

These charges reflect a broader and deeper practice of downgrading conduct that may amount to torture or inhuman treatment to lesser administrative or criminal offences. As a result, those implicated in acts of violence, torture and ill-treatment evade accountability commensurate with the gravity of their conduct, while victims are deprived of effective remedies.

II. International Findings and Recommendations

¹⁵ Prosecution Service of Georgia, 2025 Activity Report of the Prosecutor's Office of Georgia, pgs. 136-137, available at https://pog.gov.ge/uploads_script/resources/tmp/php91QU5i.pdf [GEO]

¹⁶ Nodar Meladze, video showing ill-treatment and torture by police officers, available at <https://www.facebook.com/nodar.meladze/videos/2289490045128077/>

¹⁷ Formula TV, Footage from the Kombinati settlement showing police officers physically assaulting a young man during his arrest, available at <https://www.facebook.com/TVFormula/videos/>

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¹⁸ Amnesty International, Georgia: Justice and accountability require more than criminal charges against five police officers for assaulting protesters, 08 May 2026, available at <https://www.amnesty.org/en/latest/news/2026/05/georgia-justice-and-accountability-require-more-than-criminal-charges-against-five-police-officers-for-assaulting-protesters/>

The lack of effective investigations into allegations of torture and ill-treatment by the law enforcement authorities in Georgia have been consistently identified and condemned across multiple international and domestic bodies.

The European Court of Human Rights Grand Chamber (December 2025) confirmed the systemic ineffectiveness of investigative authorities in responding to police violence.

In regard of prohibition of torture and other cruel, inhumane and degrading treatment or punishment, the Special Rapporteur under the OSCE Moscow Mechanism report in respect of Georgia (March 2026) recommended that

- the Georgian authorities immediately end the disproportionate use of force, including torture and other forms of ill-treatment;
- ensure that any use of force is strictly proportionate,
- conduct prompt, independent and impartial investigations into all allegations of abuse,
- guarantee humane treatment during apprehension, transportation and detention,
- and adopt child-sensitive policing practices to protect children during law enforcement operations.¹⁹

The Council of Europe Monitoring Committee (May 2026) deplored the absence of credible investigations into police brutality and expressed specific concern at “reports that prohibited chemical agents have been used for the dispersal of the protest in Tbilisi”.²⁰

In his June 2026 memorandum, Council of Europe Commissioner for Human Rights Michael O’Flaherty criticized the substantial delays and limited progress in investigations, called for thorough, independent, and transparent inquiries into allegations of police abuse, including the use of chemically treated water cannons, and urged Georgia to implement European Court of Human Rights standards on effective investigations into ill-treatment by law enforcement.²¹

At the domestic level, the Ombudsperson of Georgia's 2024-2025 Annual Reports highlight complaints on abuse and ill-treatment in police custody — findings that further corroborate the international consensus on the scale and persistence of the problem.²²

These findings collectively point to a continuing structural problem requiring systemic reform.

¹⁹ OSCE Office for Democratic Institutions and Human Rights (ODIHR), OSCE Fact-Finding Mission on Georgia (2026) under Paragraph 12 of the Moscow Mechanism: Report on Developments in Georgia in Respect of Human Rights and Fundamental Freedoms since Spring 2024, by Professor Patrycja Grzebyk, Sole Rapporteur, ODIHR.GAL/9/26/Corr.1 (12 March 2026), pg. 7, available at https://odihr.osce.org/sites/default/files/documents/official_documents/2026/03/odgal0009c1%20ODIHR%20NV%2082-2026%20report_Moscow%20Mechanism%20invoked%20in%20respect%20of%20Georgia_0.pdf;

²⁰ PACE, the Monitoring Committee, Georgia: democratic backsliding and crackdown on opposition and civil society continue, says PACE committee, 21 May 2026, available at <https://pace.coe.int/en/news/10300/georgia-democratic-backsliding-and-crackdown-on-opposition-and-civil-society-continue-says-pace-committee>

²¹ Council of Europe Commissioner for Human Rights, Memorandum on Georgia: Council of Europe Commissioner Calls for Accountability of Law Enforcement and Expresses Concerns Regarding Mounting Restrictions on Democratic Freedoms, Strasbourg, 19 June 2026, following the Commissioner’s visit to Georgia in April 2026, paras 6, 13-15, and 41, available at <https://rm.coe.int/memorandum-on-georgia-on-accountability-of-law-enforcement-and-freedom/48802c0ac8>

²² The Public Defender's 2025 Annual Report similarly documented ongoing police violence against detainees. Between 1 March 2025 and 20 February 2026, Public Defender representatives visited 131 individuals detained in connection with protests, of whom 35 (26.7%) reported ill-treatment and 17 showed visible injuries. Described conduct included physical violence, degrading and insulting treatment, verbal abuse, excessively tight handcuffing, and disproportionate use of force. While the overall number of cases decreased compared to 2024 — attributable to the reduced scale of protests rather than any improvement in police conduct — the patterns of abuse remained consistent and unaddressed. Public Defender of Georgia, Annual Report on the Situation of Human Rights and Freedoms in Georgia – 2025, pgs. 77-80, available at <https://ombudsman.ge/res/docs/2026040108450417707.pdf> [GEO]

III. Conclusions and Recommendations

Georgia's failure to fulfil its obligation to conduct effective investigations into incidents of police violence, prosecute those responsible, and ensure effective remedies for victims constitutes a continuing breach of both its obligations under the Convention and those arising from the European Court of Human Rights Grand Chamber judgment of December 2025. The abolition of the Special Investigation Service, the normalisation of impunity for police violence, and the systematic reclassification of serious acts of violence and ill-treatment committed by law enforcement officials as lesser offences indicate a regression in the effectiveness of the system rather than meaningful reform.

To address the persistent pattern of police violence and impunity in Georgia, it is recommended to:

- ❖ **Ensure prompt, impartial, independent, and effective investigations** into all allegations of torture, ill-treatment, excessive use of force, arbitrary detention, and other human rights violations committed by law enforcement officials, in accordance with international human rights standards.
- ❖ **Guarantee the proper legal classification of acts of torture and ill-treatment**, ensuring that such conduct is investigated and prosecuted under the relevant criminal offences rather than being downgraded to lesser offences.
- ❖ **Establish or restore a genuinely independent investigative mechanism** with the institutional, operational, and financial independence necessary to investigate crimes committed by law enforcement officials, free from prosecutorial or executive influence.
- ❖ **Ensure accountability at all levels of the chain of command**, including criminal, disciplinary, and administrative responsibility for commanders and supervisors who order, condone, fail to prevent, or fail to adequately respond to acts of alleged torture, ill-treatment, or unlawful use of force.
- ❖ **Provide victims with effective remedies**, including access to justice, adequate compensation, rehabilitation, psychological support, and guarantees of non-repetition, consistent with international standards on the right to reparation.
- ❖ **Strengthen transparency and public oversight** by publishing comprehensive and disaggregated data on complaints against law enforcement officials, investigations, prosecutions, disciplinary proceedings, convictions, and reparations.
- ❖ **Ensure full cooperation with international human rights mechanisms**, including the implementation of recommendations and judgments issued by international and regional human rights bodies, and facilitate independent monitoring of law enforcement practices.
- ❖ **Refrain from rewarding or publicly endorsing officials credibly implicated in serious human rights violations**, including through the conferral of state honours, promotions, financial benefits, or other forms of official recognition, pending the completion of independent investigations.
- ❖ **Review and reform legislation, institutional policies, and operational practices** governing policing, use of force, arrest procedures, and detention to ensure compliance with international human rights law and the absolute prohibition of torture.

- ❖ **Introduce mandatory human rights training** for all law enforcement personnel, prosecutors, and judges, focusing on the prohibition of torture, accountability for excessive use of force, effective investigation of human rights violations, and the protection of fundamental freedoms during assemblies and public demonstrations.

Meaningful compliance with international human rights obligations requires structural reforms that are measurable, transparent, independently monitored, and capable of effectively preventing future violations while ending the longstanding cycle of impunity for police misconduct.