



INTERNATIONAL  
NUREMBERG  
PRINCIPLES  
ACADEMY



# Refugees as Potential Witnesses of International Crimes

Guidelines for  
Social Workers  
and Care Providers  
in Germany

## Contents

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## Foreword

Under the principle of universal jurisdiction, Germany is able to domestically prosecute international crimes which may not have any personal or territorial link to the country. Following the surge in its refugee and asylum seeker population as a result of the violence perpetrated in war-torn countries, including Syria and Iraq, a number of potential victims, witnesses and evidence are within reach for the prosecution of these crimes. These Guidelines recognize the fact that both refugees and asylum seekers may be potential witnesses and victims of such international crimes and may choose to disclose sensitive information which may amount to potential evidence of international crimes to those that work with them, particularly social workers and care providers.

Bearing this in mind, the International Nuremberg Principles Academy, in cooperation with the City of Nuremberg, has elaborated these Guidelines to help staff working in refugee agencies or social welfare offices to correctly handle any sensitive information and given situation. Based on initial fieldwork conducted within the social welfare environment relating to refugees and asylum seekers in Nuremberg, the Guidelines also seek to contextualize this potential evidence against the backdrop of the domestic prosecutions of international crimes in Germany. Furthermore, they endeavor to unify current lines of reference so that potential evidence is relayed to the appropriate law enforcement agency, under the correct circumstances, based on an informed decision and consent, and keeping in mind the security of those involved.

The International Nuremberg Principles Academy acknowledges with appreciation the work of the experts and practitioners involved and would like to thank all for their contributions to this first version of the Guidelines, and would like to draw particular attention to the support and insight it received from the City of Nuremberg which led to this successful collaboration.

## 1. Introduction

### 1.1. What is the purpose of these guidelines?

These Guidelines are intended for the use of staff who in their day to day work regularly come into contact and work with refugees and/or asylum seekers. This can include social and care workers, welfare workers, management staff and other employees of refugee agencies or social welfare offices. The aim of the Guidelines is to assist this staff when they find themselves in possession of information provided to them by the refugees/asylum seekers they work with which may have potential significance for ongoing and future prosecutions of international crimes in Germany.

To this end, the Guidelines seek to assist in three ways:

1. Provide the link between the work of social workers and care providers and international criminal law;
2. Illustrate how to recognize and preserve information provided by refugees/asylum seekers which can promote accountability for international crimes; and
3. Explain how to channel such information to appropriate law enforcement agencies and under the correct circumstances while protecting both the staff and the refugee/asylum seeker.

### 1.2. What is the link between your work and the prosecution of international crimes?

Refugees/asylum seekers may play a crucial role in the domestic prosecution of international crimes and bringing those responsible to justice. With individuals fleeing war zones and arriving in Germany, potential witnesses and victims, a remarkable amount of evidence and even suspects may come within reach of German investigators and law enforcement authorities. Such evidence is typically lost due to the dispersion of refugees to many different locations, the lack of familiarity with reporting and judicial mechanisms, and the time lag in reporting of crimes. As a consequence, many crimes may go unreported, perpetrators could not be held accountable, and victims may not be allowed to bring their claims forward and participate in a justice process. Coming into regular contact with refugees/asylum seekers, your work places you in the position of potentially receiving sensitive information which could be important for criminal investigators and prosecutors in Germany. Thus, you help provide the link for potential witnesses and victims of crimes and a justice process. By supporting refugees/asylum seekers **who are willing to report evidence** in relation to possible international crimes, you are in a position to make a difference towards accountability for these crimes. As a matter of fact, investigations of that nature are already under way in Germany, France and Sweden.<sup>1</sup>

### 1.3. What is your role in this process?

At this stage, it must be emphasized that your role does not comprise that of a criminal investigator. To the contrary, these Guidelines are only to be used when you have been approached by a refugee/asylum seeker with information which may be important for the purpose of prosecuting an international crime.

Should this happen, your role in the process is to support individuals who wish to preserve and report evidence in relation to a potential international crime. Your role may be threefold:

1. Provide information to refugees/asylum seekers regarding their right to participate in a potential investigation or prosecution;
2. Collect information about the alleged crimes that the refugees/asylum seekers share;
3. Refer them to the appropriate psychosocial support, legal support or law enforcement agency.

In more general terms, another important role you or your agency could play is keeping statistics of the reports of international crimes. The scope or widespread nature of reported crimes may be of importance to an investigation.

<sup>1</sup> For a brief overview, please see: Human Rights Watch (2016). Video: How to Prosecute War Criminals in Europe. [online] Available at: <https://www.hrw.org/video-photos/video/2016/10/20/video-how-prosecute-war-crimes-europe> [Accessed 22 Sep. 2017].

## 2. What you need to know

### 2.1. What are international crimes?

International crimes are grave violations of international law and are seen as the most serious crimes of concern to the international community as a whole. Genocide, crimes against humanity and war crimes are core international crimes and are defined in the Rome Statute of the International Criminal Court (ICC).<sup>2</sup> These may be investigated by the ICC if they fall within that Court's jurisdiction (i.e. crimes committed by a national of a State party, or in the territory of a State party after 1 July 2002 or when the State ratified the Rome Statute) and are admissible (i.e. the same case is not genuinely investigated or prosecuted by a national authority). It follows that not all international crimes fall under the jurisdiction of the ICC. International crimes can also be investigated and prosecuted by another ad hoc international court or by a national court.

### 2.2. Are international crimes part of German law?

Yes, the Code of Crimes Against International Law (CCAIL)<sup>3</sup> was passed on 30 June 2002 and implemented the criminal provisions of the Rome Statute of the ICC into German law.<sup>4</sup> This means that international crimes are now directly punishable in Germany. International crimes committed before 2002 have been and can be further prosecuted under the ordinary criminal code.

### 2.3. Which German law enforcement authority is responsible for the domestic prosecution of international crimes?

According to the Courts Constitution Act 1975<sup>5</sup>, the primary legislation concerning court organization in Germany, the Federal Prosecutor is tasked with the investigation of international crimes as laid down in the CCAIL.<sup>6</sup> The Federal Prosecutor has wide discretion and may decline to investigate a case where the suspect is not in Germany and where his or her presence is not anticipated, as long as neither the suspect nor the victim is a German national.<sup>7</sup> To support the Federal Prosecutor, the German Federal Police established, in 2009, the Central Unit for the Fight against War Crimes and further Offences

<sup>2</sup> See Annex I for definitions of genocide, crimes against humanity and war crimes in German law.

<sup>3</sup> Völkerstrafgesetzbuch (VStGB) ("Code of Crimes against International Law" or CCAIL), entered into force on 30 June 2002. [online] Available at <http://www.gesetze-im-internet.de/vstgb/BfNR225410002.html>; English translation available at [germanlawarchive.iuscomp.org/?p=758](http://germanlawarchive.iuscomp.org/?p=758) [Accessed 22 Sep. 2017].

<sup>4</sup> There are two distinctions between the CCAIL and the Rome Statute. The CCAIL merely requires that one member of the group is targeted on the basis of national, racial, religious, or ethnic grounds in order to establish genocide so long as the intent requirement is satisfied. The CCAIL does not distinguish between crimes committed in an international armed conflict and those committed in a non-international armed conflict.

<sup>5</sup> Courts Constitution Act in the version published on 9 May 1975 (Federal Law Gazette [Bundesgesetzblatt] Part I p. 1077), last amended by Article 1 of the Act of 2 July 2013 (Federal Law Gazette Part I p. 1938).

<sup>6</sup> § 120 Section 1 No. 8 Courts Constitution Act in conjunction with § 142a Section 1 Courts Constitution Act.

<sup>7</sup> 153f of the German Code of Criminal Procedure to decline to investigate and prosecute where the alleged crimes have no connection to Germany and where there are no reasonable prospects of a successful investigation. German Parliament, "Entwurf eines Gesetzes zur Einführung des Völkerstrafgesetzbuches" 13 Mar. 2002.

### 2.4. Can international crimes be prosecuted before German courts?

#### Example

pursuant to the CCAIL (ZBKV).<sup>8</sup> This Unit collects and analyzes information on these types of crimes and submits it to the Federal Prosecutor General for legal assessment and for the institution of investigative proceedings. At a national level, the ZBKV also cooperates with the ZBKV points of contact at the state security departments of the State Criminal Police Offices and of the Federal Police.

Yes, as international crimes are part of German law, they can also be prosecuted before German domestic courts. For instance, if an international crime has been committed by a German national, against a German national, or in the territory of Germany it can be prosecuted before German courts.

Importantly, however, the principle of **universal jurisdiction**, as laid down in Section 1 CCAIL, also allows Germany to prosecute international crimes even if there is no link between Germany and the international crime committed. The accused does not have to be present in Germany, does not have to be a German national or have committed any of the crimes in the territory of Germany itself.

On 17 November 2009, Ignace Murwanashyaka was arrested in Germany on the basis of an arrest warrant issued by the German Federal Court of Justice. Murwanashyaka was born in Rwanda and gained political asylum in Germany in 2000. In 2001, Murwanashyaka became the head of the Democratic Liberation Forces of Rwanda (FDLR) and was accused in Germany of having coordinated serious human rights violations committed by the FDLR between 2008–9. The FDLR reportedly killed several hundred civilians, pillaged and burned down numerous villages and left many women raped or subjected to other forms of sexual violence.

On 8 December 2010, the German Federal Prosecutor charged Murwanashyaka with 26 counts of crimes against humanity and 39 counts of war crimes, allegedly committed by the FDLR on Congolese territory. The trial took place before the Higher Regional Court in Stuttgart and began on 4 May 2011. The Court issued its first trial verdict on 28 September 2015, convicting Murwanashyaka for several of his charges and sentenced him to 13 years in prison. The judgment is pending appeal decision.

<sup>8</sup> In German, Die Zentralstelle für die Bekämpfung von Kriegsverbrechen und weiteren Straftaten nach dem Völkerstrafgesetzbuch (ZBKV).

### 3. Steps to take to support a refugee/asylum seeker in preserving and reporting evidence

#### 3.1. Preliminary remarks

You are a bridge between the refugee/asylum seeker and the law enforcement agency. The trust that has been built over time between the refugee/asylum seeker and you due to the nature of your work, places you in a unique position in society to play an essential role in providing practical, as well as psychological, support in the reporting process. The steps to be taken in such a situation can be roughly divided into four stages:

1. Provide the refugee/asylum seeker with important information relating to the reporting of evidence to manage expectations and discuss possible options.
2. Collect the information from the refugee/asylum seeker in a consistent and standardized format using the separate "Information Registration Form for Witnesses". The information on this form must stay confidential between the member of staff and the refugee/asylum seeker and must not be disclosed to a third party without the consent of the refugee/asylum seeker.
3. Seek legal advice from an expert in international criminal law and/or refugee law who will be able to assess the information provided, as well as the situation, and suggest further steps to be taken particularly in relation to contacting law enforcement agencies.
4. Refer the refugee/asylum seeker to appropriate psychosocial support and treatment, as needed.<sup>9</sup>

#### 3.2. Important information for the refugee/asylum seeker

Before collecting any information from the refugee/asylum seeker, please discuss the expectations of the individual and their willingness to report the information they are providing to you. At this stage, you should also discuss your involvement in the process and the support you are willing to provide. The following are relevant points for discussion:

##### Expectation management

Not all information provided by the individual will be followed and lead to a criminal charge or case before a German court. Expectations must be managed in this respect. However, this does not mean that the information should not be handled and channeled correctly. Therefore, it is important to have this information presented to the appropriate experts to ascertain their potential significance and proceed accordingly.

##### Length and complexity of prosecuting international crimes

The prosecution of international crimes requires a breadth of evidence and can take years to complete. Refugees/asylum seekers need to be aware that the information they provide can take time to process and that evidence provided in trials needs to be corroborated with other accounts to establish patterns of criminality i.e. their evidence alone will not be solely sufficient for a conviction.

<sup>9</sup> See Annex II for a list of support organizations for victims of international crimes in Germany.

##### Specificity of the information

Even if the refugee/asylum seeker cannot identify individual perpetrators or other particular details, the information they report can still be of high importance for so-called "structural investigations" underway. For example, in the context of Syria and Libya, the Federal Prosecutor has introduced such investigations which are cases against unknown persons and are designed to investigate not only a singular case, but the entire estate of a case, such as an attack on a civilian population. Such information acts as a knowledge store where the descriptions and details provided by individuals could identify patterns of violence, structures within criminal organizations and even eventually point to a potential perpetrator.<sup>10</sup>

##### Implications for the refugee/asylum seeker

It must be explained that should the individual choose to provide information, this does not positively or negatively impact the asylum application or settlement process in and of itself. That being said, circumstances are assessed on a case by case basis, and contradictions in reports given to the asylum officer and police for instance may have negative implications.

##### Language requirements

If you are under the impression that language might be an obstacle, identify a suitable translator who is willing to support the process with confidentiality.

##### Compliance with internal regulations

Finally, consider what action you may have to take to comply with the decision-making structures within your agency. For instance, this may involve informing your superior and gaining their permission for any subsequent action you intend to take. In this respect, ensure that the refugee/asylum seeker is well informed, and approves, of the information which may be relayed for this purpose, and to whom.

### 3.3. Collection of information

It is advised to collect in writing what was told to you by whom and when. Please use the separate form available and ensure that the five W's are answered in relation to the incident(s) as far as possible.

- **What** happened?
- **Who** was involved? (i.e. alleged perpetrators, any witnesses, or other victims)
- **Where** did it take place?
- **When** did it take place?
- **Why** did that happen?
- Additionally, does any corroborating documentation exist? (medical records, arrest or prison records, photos, etc.)

It is emphasized that this documentation can generally only be an initial approach to the crime(s) reported by the refugee/asylum seeker. It will always be necessary to provide detailed testimony to the competent law enforcement agencies.

<sup>10</sup> For more information, see Haskell, L. (2014). Extending the Reach of Justice, JURIST, [online] Available at: <http://www.jurist.org/hotline/2014/09/leslie-haskell-extending-justice.php> [Accessed 22. Sep 2017].

### 3.4. Legal advice

It is important to seek legal advice from a legal expert in the field of criminal law who will be able to assess the information you have collected and advise on options of how to proceed. While it is important to exchange with superiors and colleagues on how to move forward, an informed legal assessment will nevertheless be necessary. During this consultation:

- Ask about the possibility of bringing such a case and the associated risks. This may include assessing the relevance and strength of the information at hand, and determining whether additional information is required before proceeding with anything further.
- Ask what the process of reporting potential evidence to a law enforcement agency looks like, and what to expect during an international criminal investigation and prosecution case.

In addition to the above, it is advised to also consult a lawyer specialized in refugee/asylum law:

- Ask the lawyer about the rights of victims and witnesses<sup>11</sup>, particularly in relation to their involvement in potential criminal trials. This includes discussing under which circumstances the individual has the right to remain silent and under which they are required to cooperate with the relevant law enforcement agencies.
- Ask for suggestions of steps to be taken to minimize risk of potential reprisals, intimidation, violence or harassment or stigmatization against you, the refugee/asylum-seeker or their family.
- Discuss any potential implications reporting information may have on the individual. Importantly, being declared a victim or witness of an international crime does not guarantee a regularized immigration status and all relevant facts ought to be presented during the asylum application process.
- Clarify what the next steps would be for the refugee/asylum seeker, for example if the law enforcement agencies should be contacted and if yes by whom and in what form. It is important that the refugee/asylum seeker is informed and understands what the next steps would be in this process. Enquiries should also be made at this stage to determine relevant focal points at the police and prosecutor's office.

#### How to seek legal advice?

The European Commission on Refugees and Exiles (ECRE) has created the European Legal Network on Asylum (ELENA) as a forum of legal practitioners who aim to promote the highest human rights standards for the treatment of refugees/asylum seekers and other persons in need of international protection. For a list of specialized local lawyers offering legal support to refugees/asylum seekers visit the "ELENA Index" and select "Germany" to locate lawyers closest to you.<sup>12</sup>

<sup>11</sup> For more information see: European e-justice, (2017). Rights of victims of crime in criminal proceedings in Germany [online]. Available at: [https://e-justice.europa.eu/content\\_rights\\_of\\_victims\\_of\\_crime\\_in\\_criminal\\_proceedings-171-de-en.do?member=1](https://e-justice.europa.eu/content_rights_of_victims_of_crime_in_criminal_proceedings-171-de-en.do?member=1) [Accessed 22 Sep. 2017]. See also: REDRESS, (2014). Handbook for Victims of Serious International Crimes in the EU: Your rights to access support, advice and justice. [online] Available at: [http://www.redress.org/downloads/publications/141victims\\_handbook.pdf](http://www.redress.org/downloads/publications/141victims_handbook.pdf). [Accessed 22 Sep. 2017].

### 3.5. Psychosocial support

In addition to the above, you may also wish to consult common online directories when searching for a local lawyer. For example, on the website of the German Association of Lawyers (Deutscher Anwältsverein) you may directly enter search criteria in terms of area of law (e.g. "criminal law") and location (i.e. relevant city).<sup>13</sup> Also, on the websites of the local bar associations (Rechtsanwaltskammern) you may also tailor your "search for a lawyer" (Anwaltsuche).<sup>14</sup>

Complementary to the support you provide within the parameters of your own work, consider whether the refugee/asylum seeker requires or has requested psychosocial counseling to assist them during this process. To this end, you may:

- Contact support organizations whose services are tailored for victims of international crimes.<sup>15</sup>
- Help the refugee/asylum-seeker with accessing existing support structures, particularly regarding psychological treatment.

### 3.6. A practical illustration of the guidelines

As a social worker, your role has included assisting refugees/asylum seekers with settling into their new community and adapting to their new environment. Whilst at work you converse regularly with refugees/asylum seekers. During one of your conversations, an individual tells you about acts they have witnessed during a given conflict and/or whilst migrating to Germany. You believe that some of the details provided to you could point towards the commission of an international crime under German law as described above and in Annex I.

You ensure that you do not place either yourself or the individual at any risk during the process by speaking to them confidentially. You provide the individual with important information regarding the reporting process and ascertain whether they would be willing to refer this information to the appropriate law enforcement agencies with your support. If they are willing to do this, you note down the information they provide you on the registration form for purposes of consistency and standardization. You and/or the refugee/asylum seeker consult with a legal expert and local lawyer, with the individual's consent, and obtain further guidance on the admissibility of this information, on what the process would look like if continued, the rights and obligations of the individual and yourself in the process. You also seek advice on any necessary safety precautions to be taken, for example, if the individual fears they will be stigmatized within the refugee community where they currently reside, you discuss options of how to continue and minimize this risk with the expert(s).

If the expert(s) believe that the information provided has the potential to assist or lead to an investigation or prosecution, you discuss how to proceed with contacting the appropriate law enforcement agencies.

<sup>12</sup> See European Council on Refugees and Exiles, Need a Lawyer? [online]. Available at <https://www.ecre.org/need-a-lawyer/> [Accessed 22 Sep. 2017].

<sup>13</sup> See Deutscher Anwalt Verein [online]. Available at <https://anwaltverein.de/de/> [Accessed 22 Sep. 2017].

<sup>14</sup> See Anwalt Zentrale [online]. Available at <http://anwaltzentrale.de/anwaltzentrale/anwaltskammer.php>. [Accessed 22 Sep. 2017].

<sup>15</sup> See Annex II – List of support organizations for victims of international crimes in Germany.

## Annex I – Definition of international crimes in German law

### What is genocide?

Genocide occurs when the following acts are committed “with the intent of destroying, as such, in whole or in part, a national, racial, religious or ethnic group”<sup>16</sup>:

- Killing a member of the group
- Causing serious bodily or mental harm to a member of the group, especially of the kind referred to in section 226 of the Criminal Code
- Inflicting on the group conditions of life calculated to bring about their physical destruction in whole or in part
- Imposing measures intended to prevent births within the group
- Forcibly transferring a child of the group to another group

### What are crimes against humanity?

Crimes against humanity are the following acts that are “committed as part of a widespread or systematic attack directed against any civilian population”<sup>17</sup>:

- Killing a person
- Inflicting, with the intent of destroying a population in whole or in part, conditions of life on that population or on parts thereof, being conditions calculated to bring about its physical destruction in whole or in part
- Trafficking in persons, particularly in women or children, or whoever enslaves a person in another way and in doing so arrogates to himself a right of ownership over that person
- Deporting or forcibly transferring, by expulsion or other coercive acts, a person lawfully present in an area to another State or another area in contravention of a general rule of international law
- Torturing a person in his or her custody or otherwise under his or her control by causing that person substantial physical or mental harm or suffering where such harm or suffering does not arise only from sanctions that are compatible with international law,
- Sexually coercing, raping, forcing into prostitution or depriving a person of his or her reproductive capacity, or confining a woman forcibly made pregnant with the intent of affecting the ethnic composition of any population
- Causing a person’s enforced disappearance, with the intention of removing him or her from the protection of the law for a prolonged period of time
  - a) by abducting that person on behalf of or with the approval of a State or a political organization, or by otherwise severely depriving such person of his or her physical liberty, followed by a failure immediately to give truthful information, upon inquiry, on that person’s fate and whereabouts, or

<sup>16</sup> CCAIL, Section 6, Genocide.

<sup>17</sup> CCAIL, Section 7, Crimes against humanity.

b) by refusing, on behalf of a State or of a political organization or in contravention of a legal duty, to give information immediately on the fate and whereabouts of the person deprived of his or her physical liberty under the circumstances referred to under letter (a) above, or by giving false information thereon

- Causing another person severe physical or mental harm, especially of the kind referred to in section 226 of the Criminal Code
- Severely depriving, in contravention of a general rule of international law, a person of his or her physical liberty, or
- Persecuting an identifiable group or collectivity by depriving such group or collectivity of fundamental human rights, or by substantially restricting the same, on political, racial, national, ethnic, cultural or religious, gender or other grounds that are recognized as impermissible under the general rules of international law

### What are war crimes?

War crimes are serious violations of laws and customs committed in connection with an international armed conflict or with an armed conflict not of an international character. This means that, in order for war crimes to be committed, the crimes must have taken place in the context of an international or non-international armed conflict.

War crimes are extensively defined in the CCAIL under the following sections<sup>18</sup>:

- Section 8 – War crimes against persons
- Section 9 – War crimes against property and other rights
- Section 10 – War crimes against humanitarian operations and emblems
- Section 11 – War crimes consisting in the use of prohibited methods of warfare
- Section 12 – War crimes consisting in employment of prohibited means of warfare<sup>19</sup>

<sup>18</sup> CCAIL, Sections 8–12, War Crimes. Also, see footnote 3.

<sup>19</sup> In order to better understand the context in which war crimes occur, it is recommended to read the International Committee of the Red Cross (ICRC)’s “What is International Humanitarian Law?”<sup>20</sup> This will also hopefully provide some answers to aid your understanding of the relevant sections of the CCAIL mentioned above.

ICRC, (2004). What is International Humanitarian Law? [online] Available at [www.icrc.org/eng/assets/files/other/what\\_is\\_ihl.pdf](http://www.icrc.org/eng/assets/files/other/what_is_ihl.pdf) [Accessed 22 Sep. 2017].

## Annex II – List of support organizations for victims of international crimes in Germany

If this non-exhaustive list does not include an organization near you, please contact BAfF e.V. for further assistance:

BAfF e.V., Bundesweite Arbeitsgemeinschaft der Psychosozialen Zentren für Flüchtlinge und Folteropfer  
Auguststr. 71, 10117 Berlin  
Tel.: 030-310 124 63  
E-Mail: [info@baff-zentren.org](mailto:info@baff-zentren.org)  
[www.baff-zentren.org](http://www.baff-zentren.org)

**Psychosoziales Zentrum für Flüchtlinge Nürnberg**  
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E-Mail: [jugendhilfe-nuernberg@rummelsberger.net](mailto:jugendhilfe-nuernberg@rummelsberger.net)  
[www.jugendhilfe-rummelsberg.de/jugendhilfe\\_nuernberg\\_zentrum\\_fluechtinge.jugendhilfe](http://www.jugendhilfe-rummelsberg.de/jugendhilfe_nuernberg_zentrum_fluechtinge.jugendhilfe)

**Medizinische Flüchtlingshilfe Nürnberg**  
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90429 Nürnberg  
Tel.: 0171-547 00 03

**Medizinische Flüchtlingshilfe Erlangen**  
Tel.: 0176-382 024 64  
[www.fmm.med.uni-erlangen.de/med-flchtlingshilfe.shtml](http://www.fmm.med.uni-erlangen.de/med-flchtlingshilfe.shtml)

**Behandlungszentrum für Folteropfer Berlin e. V.**  
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**MFH Bochum – Medizinische Flüchtlingshilfe e.V.**  
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**Caritas – Flüchtlingsberatung Köln Therapiezentrum für Folteropfer, e.V.**  
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[caritas.erzbistum-koeln.de/koeln-cv/index.html](http://caritas.erzbistum-koeln.de/koeln-cv/index.html)

**Behandlungszentrum für Folteropfer Ulm (BFU)**  
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[www.bfu-ulm.de/](http://www.bfu-ulm.de/)

**REFUGIO München**  
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