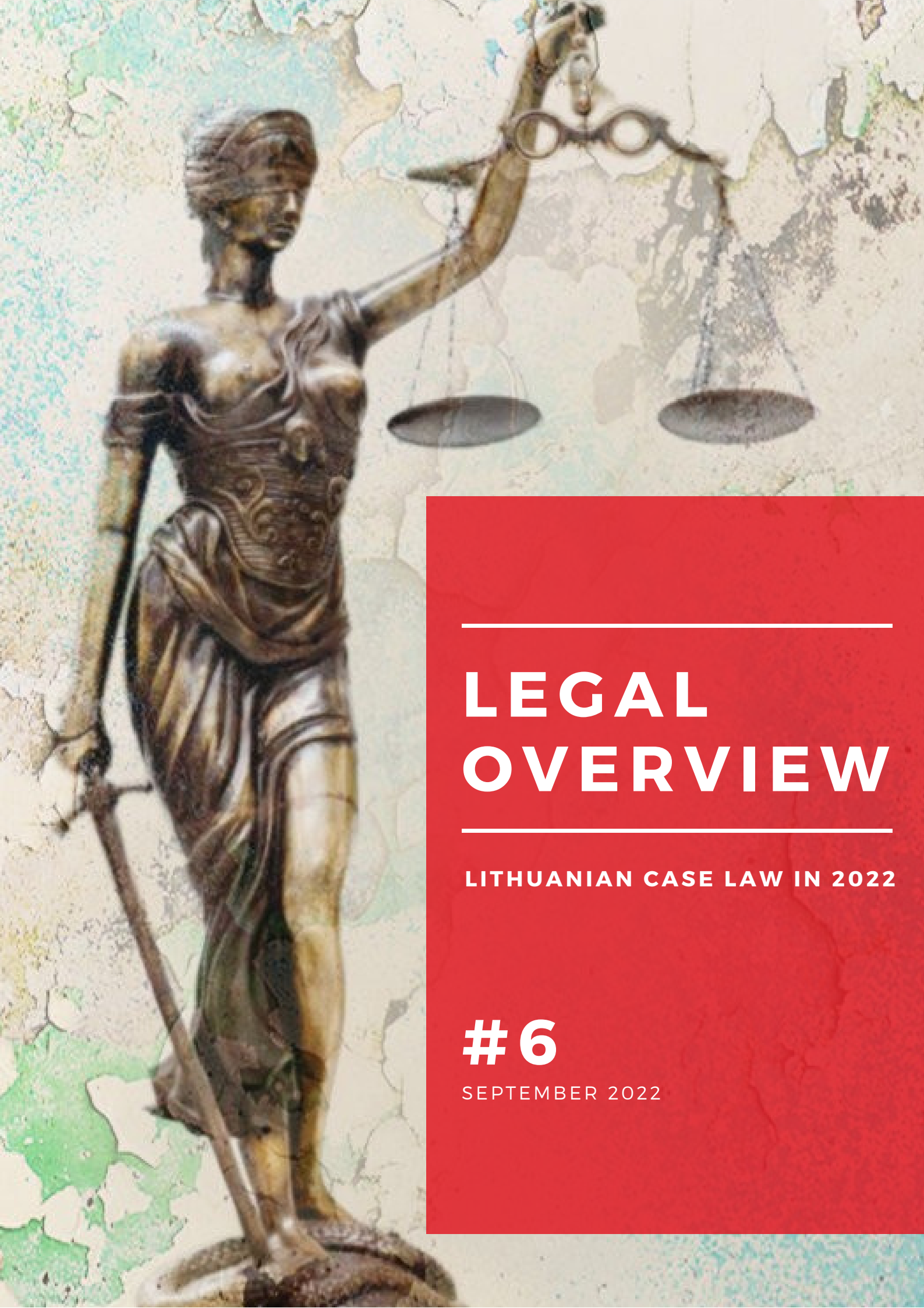

LEGAL OVERVIEW

LITHUANIAN CASE LAW IN 2022

#6

SEPTEMBER 2022

Lithuanian Red Cross is a nongovernmental organization which has been providing social, humanitarian, and legal assistance to refugees, asylum seekers, stateless persons, and other migrants irrespective of their legal status for over 25 years.

Legal overviews have been prepared within the framework of the Lithuanian Red Cross initiative, which aims to monitor the practice of Lithuanian courts in the area of migration and asylum and to share information on some significant decisions. The overviews include relevant extracts from this year's case law and additional explanations that are not legally binding.

The commentaries provided in the overviews are intended to explain the wider context and potential impact of the judgements covered on the development of case law. In providing these commentaries, the lawyers of the Lithuanian Red Cross rely on their subject matter competency and long-term experience in the field of migration and asylum, as well as on case law of international courts, legal and scientific literature. We are grateful to our partners and colleagues for additional insights.

Legal overviews prepared by the Lithuanian Red Cross are for information purposes only, they do not create/entail in itself rights or legal obligations when considering individual cases. Reference to the source of the information is required for quotation or distribution of this Legal overview:

Lithuanian Red Cross. (September 2022). *Legal overview #6*

DECISIONS IN THIS OVERVIEW

I. Decision of the Supreme Administrative Court of Lithuania (hereinafter referred to as the SACL) of 29 June 2022 in administrative case No eA-2932-881/2022
KEYWORDS: assessment of evidence, duty to cooperate with the asylum seeker.

II. Decision of the SACL of 5 July 2022 in administrative case No eA-3023-821/2022
KEYWORDS: country of origin information, credibility assessment.

In addition to these decisions, the Overview also contains several extracts from the decisions of the SACL, where the Court addresses general issues such as the principle of good administration and the obligation to give adequate reasons for decisions, the requirements applicable to the country of origin information and the assessment of evidence.

I. DECISION OF THE SACL OF 29 JUNE 2022 IN ADMINISTRATIVE CASE NO EA-2932-881/2022

CASE SUMMARY: The applicant lodged an appeal against the decision of the Migration Department refusing to grant her asylum. The applicant based her asylum application on her fear of being the victim of an "honour crime" in her country of origin. After examining the asylum application, the Migration Department rejected it on the grounds, inter alia, that the applicant's explanation of the reasons for her departure from her country of origin contained logical contradictions, lacked specific details and accuracy.

In this case, the SACL ruled on the following aspects relevant to the asylum law:

- on the determining authority's duty to actively cooperate with the asylum seeker;
- on the determining authority's duty to properly assess the evidence collected.

In paragraph 39 of its decision of 29 April 2022, the SACL stated:

„39. Having assessed the content of the contested Decision and the assessment carried out by the Migration Department, the Panel of Judges found that the Migration Department, in deciding on the issue of granting asylum to the applicant, ***carried out its assessment in a superficial manner, inadequately fulfilling its duty to cooperate with the asylum applicant****. The respondent notes that the applicant's explanations are inaccurate and logically unsound but* ***neither the Migration Department nor the court of first instance made any effort to eliminate these uncertainties, simply using this fact as an argument that the applicant's explanation is deficient****. The decision of the Migration Department highlights the inaccuracies in the facts concerning the applicant's pregnancy, the date of the applicant's marriage to (data not to be disclosed) but* ***makes no effort to find out what caused the inconsistency of these facts (e.g. inaccuracy of the translation), formally concluding that the applicant's story is not accurate."***

The observations of the court point to an entrenched problem where the purpose of the asylum procedure tends to be distorted and, instead of identifying the relevant circumstances and assessing the risks, it essentially turns into a search for "flaws" in the narrative and a test of "credibility". The SACL reminds of the positive obligation of the authorities to cooperate with the asylum seeker and to provide an opportunity to clarify missing information and/or inconsistencies or contradictions in the statements of the asylum seeker. In the given case, as the court observes, neither the Migration Department nor the court of first instance made any effort to remedy the alleged deficiencies in the narrative.

In this respect, it should be noted that the "imperfection" of the narrative often cannot be resolved by additional clarification, regardless of the interviewer's competence, effort and the interviewing techniques used. When assessing a person's story, it is important to bear in mind that in many cases, irrespective of the veracity of the story, there will be missing details, inaccuracies and contradictions. Even a perfect, flawless and sincere narrative will not necessarily be a correct representation of what actually happened, i.e. it may not be "accurate" in terms of the facts. The important thing is not so much whether the account is flawed, but what conclusions can reasonably be drawn from it. No scientific research supports the assumption that

an "imperfect" narrative is necessarily a false narrative. On the contrary, various flaws (including contradictions), especially after a long period of time after the event being described, can be found in sincere narratives. It is a mistake to assume that the interviewer intuitively knows a clear threshold of narrative "deficiencies" beyond which he or she can reasonably and confidently conclude that the interviewee is lying, or that such a threshold exists at all. It is even more erroneous to judge the veracity of a story by comparing it with an imaginary "perfect" narrative, or to generalise one's own individualised personal experience to an indefinite number of other people, in other words to compare it with an ideal or with oneself. The observation of the SACL on the importance of clarifying what led to the deficiencies in the narrative is valid but equally important is critical thinking in assessing the identified deficiencies and drawing conclusions from them. Does the contradiction observed in the narrative really mean that the person is lying? What (other than "inner belief") supports your answer to this question? Is the explanation you have chosen the only possible one? Is it more plausible than others? What is the basis for your answer to this question? These and similar questions need to be answered when evaluating a person's narrative. In the given case, as the court observes, this has not been done, instead "formally stating that the applicant's narrative is inaccurate", as if this in itself meant that it was fictional.

For the scientific rationale for detection of "lies" in a narrative in general, see the ANNEX to this overview: THE SCIENTIFIC RATIONALE FOR DETECTION OF DECEIT (OVERVIEW)

In assessing the assessment carried out by the Migration Department, the SACL, in its decision of 29 June 2022, proceeds to the specific evidence submitted by the applicant and in paragraphs 41-43 states:

„41. In this case, it must be noted that ***the applicant has submitted to the respondent the decision of the court of (data not to be disclosed), which, as the applicant claims, dissolved the forced marriage. According to the assessment of the Panel of Judges, this is an extremely important piece of evidence*** *which would enable the circumstances of the applicant's divorce to be established (e.g. whether the divorce was in fact granted in the presence of the applicant only, etc.), but, as it appears from the case material,* ***the respondent has only inserted a photo of the court's decision in the decision of the Migration Department, but the court's decision has not been translated into Lithuanian, and the content of the court's decision is not understandable and has not been analysed****. Thus, in the given case, the respondent did not take all the necessary measures to properly clarify the circumstances referred to by the applicant, by stating that the applicant could have defended her interests before the court in (data not to be disclosed), and that even her uncle did not prevent this. The Panel of Judges notes that the issue in the present case is not the applicant's legal capacity to divorce but rather the consequences which she might have suffered/had suffered as a result of such an action. These considerations should have been assessed in the context of the country of origin information gathered on honour crimes, since, as already mentioned, the country of origin information substantiates that the refusal to marry a man chosen by one's family is one of the reasons why honour crimes may be committed against women (data not to be disclosed).*

42. In the assessment of the Panel of Judges, the respondent also failed to adequately assess the applicant's narrative of the violence she may have

suffered. The applicant submitted a photo showing her lying down with a broken nose. The applicant used this photo to substantiate the fact that her uncle had broken her nose. ***In the contested decision, the respondent stated only that it was not clear when the photo was taken. The Panel of Judges emphasises that the existence or non-existence of a fact can only be established on the basis of the totality of the evidence collected in a case, and not on the basis of individual items of evidence. When establishing legally significant circumstances, the sufficiency of the evidence collected, its consistency, possible contradictions, logicality, the circumstances in which the relevant data were indicated, and the reliability of the sources of evidence must be assessed*** *(Ruling of the Supreme Administrative Court of Lithuania of 13 September 2012 in administrative case No A822-2564/2012, and Ruling of 4 April 2018 in administrative case No A-3730-261/2018).* ***In the given case, the respondent did not assess the submitted photo in the context of all the circumstances and assessed the evidence in isolation****. The respondent did not investigate the circumstances of the incident in detail, did not ask additional questions, and simply stated in its decision that, according to the statement of the asylum-seeker, her uncle broke her nose in 2018, which leaves it unclear whether the photo was in fact taken three years ago.*

43. Moreover, both the decision of the Migration Department and the decision of the court of first instance emphasised that the applicant claimed during the interview on 1 October 2021 that she would forward to the staff of the Migration Department the threatening messages which were sent by her uncle, but the applicant did not contact the Migration Department and did not provide any such evidence. It should be noted that ***neither the respondent nor the court of first instance sought to ascertain why the applicant did not send the above-mentioned evidence****, and the fact that the applicant's other evidence was not sent by the applicant herself, but by her partner, raises doubts as to the applicant's technical capacity to exercise her right to submit evidence. In the view of the Panel of Judges,* ***the respondent failed to fulfil its obligation to examine the applicant's application in a thorough and individual manner and simply used the uncertainties identified to refute the applicant's narrative****."*

In this section, the court discusses some of the evidence in the case and points out flaws in its assessment. Despite the fact that it refers to the specific evidence in a particular case, the interpretations of the SACL also provide general rules to be followed when dealing with evidence. Firstly, the proper assessment of evidence is not only a matter of drawing conclusions from it but also a process which can be replicated, if necessary, to check the validity of those conclusions. In the present case, in assessing the content of the evidence submitted by the applicant (the court decision), it should first have been translated (accordingly, the accuracy of the translation adds to the aspects to be assessed). If only the court decision itself is submitted to the court, but no information is provided on the process of its translation (i.e., for example, by whom, when and how it was translated), the validity of the conclusions drawn on the basis of this evidence cannot be verified or confirmed by the court. In fact, in such case, the conclusions are not even drawn on the basis of the decision, but on the basis of another independent piece of evidence - its translation. The absence of that evidence makes it impossible either to judge the validity of the conclusions based on it or to assess its reliability and probative value as that of an independent piece of evidence.

In paragraph 42 of the decision, the SACL proceeds to the next piece of evidence submitted

by the applicant, a photo of her "*lying down with a bandaged nose*", which supports the narrative of the applicant that her uncle broke her nose in 2018. According to the court, the Migration Department assessed this evidence in isolation and stated in its decision only that it was not clear when the photo was taken. The SACL reminds that the relevant circumstances (material facts) are established on the basis of the totality of the evidence collected and not on the basis of individual pieces of evidence. In the present case, there are at least two such pieces of evidence: the photo submitted by the applicant and the explanations of the applicant herself. The photo by itself does not confirm not only that it was taken in 2018, but also that the person in the photo is in fact the applicant (and not, for example, a woman who simply looks like the applicant), that her nose was broken (and not, for example, scratched), that her nose was broken by someone else (and not, for example, by the applicant herself when she bumped into the door frame), or that the other person was her uncle (and not, for example, her former spouse). It is highly unlikely that any photo on its own would be able to confirm all of the above, and thus, assessed in isolation, it would not confirm any relevant facts, even if it contained metadata proving that it was taken in 2018, as the applicant has indicated. Nevertheless, this photo is compatible with the other evidence (the applicant's narrative) and should be considered together with it as complementary. When the photo is assessed in isolation, it is in itself unclear when it was taken, but when it is considered in conjunction with the applicant's explanation, it is no longer "unclear", since the applicant testifies that the photo was taken in 2018, whereas the respondent does not prove otherwise, as can be seen from the court's decision, and thus does not contradict the applicant's testimony.

Finally, the court returns to the positive duty of the institutions to make every effort to collect and evaluate all information relevant to the investigation. In the present case, the applicant has indicated that she has evidence (threatening messages) to support her narrative but she has not herself contacted the Migration Department and has not provided such evidence. In the view of the SACL, this unjustifiably shifts the entire burden of proof to the applicant, whereas it's the State that is under an obligation to investigate all the relevant circumstances in detail, which includes collecting all the available evidence. Consequently, if it was known that the applicant possessed certain evidence relevant to the case, the Migration Department should have actively sought to obtain that evidence. Instead, the respondent passively waited for the applicant to provide it herself and, when she did not, highlighted that fact as justification for its refusal to grant her asylum. In this respect, it should be further noted that electronic messages have a much higher probative value as evidence as long as they remain in their original (digital) form. The forwarding of either an e-mail or a phone message can lead to the loss of metadata relevant to the investigation, which means the loss of some of the information of value. On the other hand, a screenshot of an electronic message does not contain any investigation-relevant metadata related to that message at all. Thus, a proper examination of the digital evidence contained in a smartphone requires the phone itself or an exact copy of the data contained therein. At the very least, this requires the initiative of the determining authority itself and access to the original evidence. It is almost certain that the agreement referred to in the decision of the LVAT that the applicant would "send" additional evidence to the Migration Department would imply that the form of that evidence would be altered (by simply forwarding

the text of the message or a screenshot of the message) and that the data relevant to the investigation would be lost. The receipt of, for example, a screenshot of the message could lead the Migration Department to conclude, as in the case of the photo mentioned above, that it is "unclear" who wrote the message, when and to whom. If these questions are relevant to the investigation, the responsible authority should look for answers in the metadata of the original message, which means actively seeking access to the phone (with the applicant's permission) and not relying on the "forwarding" of the message in a format of the applicant's own choosing. This example illustrates, inter alia, that working with electronic/digital evidence requires some additional specific competences from the staff of the determining authority collecting and assessing this type of evidence.

II. DECISION OF 5 JULY 2022 OF THE SACL IN ADMINISTRATIVE CASE NO EA-3023-821/2022

CASE SUMMARY: The applicant lodged an appeal against the decision of the Migration Department refusing to grant her asylum. The applicant based her asylum application on domestic violence. After examining the applicant's appeal, the court of first instance rejected it on the ground, inter alia, that the applicants narrative concerning the reasons for her departure from the country of origin was unspecific and incomplete, and that some of the statements she made were logically difficult to explain.

In this case, the SACL ruled on the following aspects relevant to the asylum law:

- on the obligation to rely on up-to-date and relevant country of origin information;
- on the rational assessment of alleged "contradictions" in assessing the credibility of a narrative.

In paragraphs 39-40 of its decision of 5 July 2022, the SACL stated:

„39. In the present case, the applicant stated in her asylum application and explained during the interviews that she fled her country of origin because her husband (whom she was married to at the age of 15, by force) and his other wives were abusive and violent towards her, and if she were to be returned to her country of origin, she would be killed by her husband, who is a man of considerable influence.

40. In the Decision, the respondent reviewed the country of origin information on the state authority, as well as data showing, inter alia, that forced marriages are common in the country of origin, women and girls have few rights and opportunities when entering into marriage or trying to divorce, individuals are often engaged or married at an early age, and that there is often a significant difference in the age of young women and their spouses, polygamy and female genital mutilation are common, although prohibited by law, and women and girls facing forced marriages are unlikely to receive adequate protection in their country of origin, as tradition requires that domestic conflicts be resolved within the family and the judicial system is generally unresponsive to such situations, and investigations of forced marriages are poorly conducted. ***The decision does not contain any information on the incidence of domestic violence, attitudes towards it in the country of origin, the measures taken (if any) in the country of origin to combat it and other relevant circumstances, although the applicant has identified this as the main reason for applying for asylum****. Thus, the Panel of Judges finds that the applicant was justified in claiming that* ***the respondent failed to collect relevant (essential) country of origin information, and that the court of first instance was unjustified in rejecting the applicant's arguments****."*

In this case the SACL pointed out that the respondent did not collect relevant country of origin information related to the core subject matter of the applicant's application, i.e. domestic violence. Instead of examining this particular aspect, the respondent erroneously focused on the issue of forced marriages, i.e. misidentified the core "material fact" of the case. In the present case, the applicant has already been forcibly married, that fact cannot be changed and she seeks protection not from the forced marriage but from the violence she has suffered in her marriage. Accordingly, since the task of the determining authority is to carry out a prospective (forward-looking) risk assessment, the focus must be first and foremost on what the asylum-seeker is at risk of, and not on what she

has already experienced, which cannot be altered by granting (or denying) her asylum. It is the task of the determining authority to distinguish between these aspects, to properly identify and qualify the threat to be assessed. Despite the fact that the asylum-seeker herself highlighted the fact of a forced marriage in her narrative, the Migration Department should have been aware that she was not seeking protection from marriage but from violence and should have focused on that. In the given case, as the SACL observes, the respondent collected information on the practice of forced marriages in the applicant's country of origin but did not provide any information on the main ground of her application, i.e. the domestic violence. This failure to identify the essential ground of the application resulted in the Migration Department's failure to fulfil its obligation to rely on accurate and up-to-date information on the most relevant circumstances of the case. Accordingly, in the absence of accurate and up-to-date country of origin information, any conclusions drawn regarding the relevant threats cannot be considered valid.

However, the most significant conclusions of the SACL are presented on another issue, in paragraphs 41-42 of the decision:

„41. The Panel of Judges also notes that the court of first instance found that the abstractness and change in the applicant's narrative and the contradictory nature of the information provided did not constitute grounds for considering that the applicant fell within the category of under-age girls who are forcibly married (as mentioned above, the applicant's asylum application was based primarily on the fact that she had suffered domestic violence, not on the fact that she had been forced into marriage). ***The court also accepted the respondent's position that some of the circumstances relied on by the applicant were difficult to explain logically****. In this respect, the court stated that it was unlikely that the deceased father's brothers, seeing that the applicant might have been physically injured and/or mentally affected, would have refused to help her and to provide her with assistance, but* ***it is not clear on what basis the court of first instance has come to that conclusion****. The internal conviction of the court of first instance was that if the applicant had been subjected to reckless violence and/or threats, she would have tried to flee as soon as she had managed to leave her home secretly and would not have tried to return each time, but* ***this conviction is again not based on any objective circumstances*** *and is based on a failure to take into account the applicant's explanation that she had been forcibly married off at the age of 15 years, after the death of her parents (a circumstance which has not been definitively clarified), that she was not financially independent, that she was subjected to violence, that she became pregnant with twins after being raped by her spouse, that the violence and abuse intensified over time, and that the culture and traditions of the country of origin were not taken into account (it should be reminded that the Decision lacks the information on the domestic violence aspect, which is considered to be crucial in this case). Similarly, the statement of the court of first instance, echoing the respondent's position in the Decision, that it is not clear why the applicant repeatedly contacted the relative(s) who informed her spouse of her complaints, which made her suffer even more, should also be considered.*

42. Furthermore, the Panel of Judges notes that, ***when assessing the credibility of the applicant in general, the inconsistencies in her explanations of how she fled her country of origin may be taken into account, but the inconsistencies and changes in such explanations do not, in themselves, undermine the credibility of the applicant's narrative of her reasons for fleeing her country of origin****. The decision of the court of first instance mentions only*

one contradiction in the applicant's narrative of the reasons for her escape from the country of origin, namely whether or not the applicant's parents had died before her marriage. The contested Decision also does not mention any other allegedly material contradictions."

In this respect, firstly, it should be noted that the credibility assessment must be based on "rational and objectively reasonable conclusions" and that the expert should not speculate on how events could or should have unfolded, or how the applicant or a third party should have acted [1]. In the given case, both the Migration Department and the court of first instance are doing precisely that - speculating on how people "should" behave in one or another situation and, on that basis, deciding on the consistency of the applicant's story. It should be noted that several types of "consistency" are distinguished as far as credibility assessment is concerned: internal consistency of the narrative (the extent to which the details of the same narrative are consistent with each other), inter-consistency of multiple narratives (the extent to which the details of multiple narratives of the same person are consistent with each other), consistency of a group of individuals' narratives (the extent to which the details of several individuals' narratives of the same event are consistent with each other), and the consistency of the narrative with the evidence (the extent to which details of the person's narrative are consistent with the other evidence). It is clear that the consistency of the asylum seeker's narrative with the expert's speculations as to how the applicant or other persons must have behaved does not fall into the above categories, and thus such speculations do not support the conclusions on consistency (inconsistency) of narrative. Otherwise, a person's narrative of his or her experiences would have to compete not only with other evidence, but also with a wide range of scenarios imagined by others. To compete on an uneven level because there are no clear requirements for the plausibility and validity of these scenarios.

Behind these speculations lie unnamed generalisations relating to the imagined typical behaviour of a "normal" or "rational" person, i.e. in essence, purely subjective intuition, without identifying the source of the generalisations used and without explaining why they are believed to be valid. Generalizations of this kind can be wrong, sometimes right, mostly right or always right. Judging by the wording chosen by the court of first instance ("*unlikely*"), the court believes that uncles do not usually refuse to help a niece who has suffered. The court does not specify what this belief is based on - personal experience, common knowledge, empirical data. It should be noted that "unlikely" means that it is nevertheless possible that in certain (rare) cases uncles would refuse to help the aggrieved niece. Why the situation of the applicant does not fall within such exceptional cases is not explained. Instead, an equivalence is drawn between "unlikely" and "impossible" and the narrative of the applicant is qualified as false on that basis. In this respect, it is regrettable to note that it is only the reasoning of the respondent and the court of first instance, and not the applicant's narrative, that is lacking in formal "logic". But this is what happens when the institutions start speculating about how past events could or should have unfolded.

Similarly, the SACL also assesses another internal belief of the court of first instance that if the applicant had actually been subjected to violence, she would have fled immediately and would not have returned. The SACL observes that such reasoning is not rationally based on any evidence and refers to different factual circumstances which could explain the behaviour of the applicant. In this respect, it should be

specifically noted that the question of why victims of domestic violence stay with or return to their abusers for a long period of time is not a new one and has been discussed for decades both in the legal environment and by scholars [2]. It has taken time and effort to convince decision-makers that the heuristic rule of "if she was really beaten, she would have left immediately" is wrong. However, they have been convinced, and there is no longer any dispute about this kind of "inner belief", at least in professional environments. It is encouraging that the SACL is trying to instil this message in the Lithuanian institutions.

The SACL draws attention to another alleged "logical" contradiction highlighted by the respondent, namely that it is "unclear" both to the respondent and to the court of first instance why the applicant repeatedly turned to her relatives for help, even though this only made her suffer more each time. In this respect, it should be noted, first of all, that the question "why?" would be "logical" to ask the only person who can explain the motives and objectives of the applicant - the applicant herself, especially since the Migration Department had the opportunity to do so during the interview and the court had the opportunity to do so during the hearing. Furthermore, it is advisable not to compare a living person with an imaginary model of a "rational person" when looking for "contradictions" or when assessing the credibility of the story in general. In the present case, a contradiction is established when the actions described by the applicant do not correspond to what the respondent and the court of first instance believe a rational person would do. This applies both to the actions of the applicant herself and to the actions of other people in her story. According to the respondent and the court of first instance, they are not rational ("logical"), which means that they are not probable. But rationality should not and cannot be a criterion for plausibility. There are many people in the world whose behaviuor in certain situations is irrational, irresponsible or simply stupid. If all people behaved rationally, perhaps none of them would find themselves in a situation where they would face persecution. For example, it is not "rational" ("logical") to take part in a protest knowing that the participants in such events are subject to mass arrests. It is even less "rational" to take part in such an action after you have already been arrested during a previous event. But to what extent does this affect the likelihood of such actions? Or the assessment of the risk of persecution? Often people behave in an irrational but also human way. Paradoxically, rational reasoning requires taking into account the irrationality of the object of reasoning. A narrative of an asylum seeker is a representation of his or her experiences, not a legal argument. When appealing to "logic", it is easy to forget that the object of the assessment is the life story of a particular living person and not a logical pattern of behaviour.

Finally, as regards the alleged "inconsistencies" in the narrative of the applicant, the SACL notes that an inconsistency in one part of the narrative does not in itself negate the reliability of the other part of the narrative. In other words, the mere fact that, for one reason or another, a person has provided inaccurate or false information on a particular issue does not justify conclusions as to the accuracy or veracity of the information he has provided on other issues. In the present case, the SACL distinguishes between the narrative of the applicant concerning the reasons which led her to leave the country of origin and the departure itself. In the court's view, the deficiencies in the narrative of the departure from the country of origin may be relevant for the assessment of the applicant's overall credibility, but there is no basis for concluding on the veracity of the narrative of the

violence experienced in the country of origin (prior to the departure), which is the substance of the application for asylum. In a sense, the court returns to the question of the identification and assessment of the individual “material facts”, reiterating that the investigation must focus on the facts which form the substance of the application.

III. COMMENTS BY THE SACL ON THE GENERAL PRINCIPLES TO BE FOLLOWED WHEN EXAMINING ASYLUM APPLICATIONS AND MAKING DECISIONS

In addition to the above-mentioned case law of the SACL, we would like to draw your attention to a number of the clarifications provided by the SACL on such general issues as the principle of good administration and the obligation to give adequate reasons for decisions, the requirements applicable to the country of origin information and the assessment of evidence. These clarifications set out general principles which must be followed when examining and deciding on applications for asylum and are likely to be applicable in any given case, irrespective of its factual circumstances.

In paragraph 41 of its decision of 10 August 2022 in administrative case No eA-3476-502/2022 the SACL stated:

„41. The Panel of Judges also notes that the Department is a public administration entity, which is bound, inter alia, by the principle of good administration. The principle of good administration, the implementation of which in national law derives from the constitutional imperative that "public authorities shall serve the people" (Article 5(3) of the Constitution of the Republic of Lithuania), requires public authorities to act with care and diligence in taking administrative decisions and to ensure that all provisions of the law are complied with in the administrative procedure (see, for example, Decision of the Supreme Administrative Court of Lithuania of 4 May 2022 in administrative case No eA-2226-502/2022). ***The Department, as a public administration entity, cannot treat the situation of the applicant in a formal and clichéd manner, as the case deals with human rights and the right to asylum, one of the fundamental rights of the individual*** *under the Charter of Fundamental Rights of the European Union, and human rights as a general good are enshrined in the highest sources of law, namely the Constitution and the Convention for the Protection of Human Rights and Fundamental Freedoms (Ruling of the Supreme Administrative Court of the Republic of Lithuania of 23 February 2022 in administrative case No eA-1268-822/2022).*"

In paragraphs 62-63 of its ruling of 10 August 2022 in administrative case No eA-3326-525/2022 the SACL stated:

„62. As mentioned above, when carrying out an investigation in the case of an asylum seeker, the respondent must assess each case individually, objectively and impartially in its decision, taking into account: accurate and up-to-date information on the asylum seeker's country of origin, including the laws and regulations of the country of origin and the manner in which they have been applied; the statements made by the asylum seeker and any documentation in his/her possession, including whether he/she has suffered or is at risk of suffering persecution or the acts referred to in Article 87(1) of the Law, and the information on the previous asylum applications of the applicant, the itinerary, travel documents and the reasons for applying for asylum; the individual situation and personal circumstances of the asylum seeker, including factors such as his and his relatives' background, sex and age, as well as the situation of persons in a similar situation in the country of origin of the asylum seeker, in order to assess, on the basis of the personal circumstances of the asylum seeker, whether the acts committed or likely to be committed against him/her could be considered as persecution or as acts referred to in Article 87(1) of the Law. ***The findings and arguments of the respondent refuting or confirming the above mentioned circumstances of the investigation shall be reflected in the decision taken by the***

respondent to grant or refuse refugee status and subsidiary protection.

63. ***Therefore, the approach taken by the respondent in the present case, whereby the arguments rebutting the narrative of the applicant are not presented in the contested decision of the respondent, but in the procedural documents addressed to the court, should be considered critically.*** *It should be noted that* ***the powers to examine applications for international protection are vested in the respondent, whereas the administrative courts are entrusted with the procedural control of the decisions taken by the respondent****."*

In paragraphs 47-49 of its decision of 3 August 2022 in administrative case No eA-3310-520-2022 the SACL stated:

„47. The obligation of the state authority, i.e. the Department, to collect information on the country of origin stems from the Law and the Description of the Procedure, the provisions of which must be interpreted in the context of the objectives of Directive 2011/95/EU and Directive 2013/32/EU, and their interpretation in the case law. The duty of the state authority examining an application for international protection to collect the country of origin information is also emphasised in the case law of the Supreme Administrative Court of Lithuania (see, e.g., Ruling of 5 May 2021 in administrative case No. eA-2908-602/2021, etc.).

48. The case law also states that ***the Department, to which the application for subsidiary protection is also submitted, must collect and assess information both on the general prevailing situation in the country of origin of the asylum seeker and on the place of residence of the applicant, and must analyse the information collected in order to ascertain whether it is safe to return the applicant to the country of origin, taking into account the region of the place of residence of the applicant and the general situation in the country of origin*** *(see, e.g. Decision of the Supreme Administrative Court of Lithuania of 4 May 2022 in administrative case No eA-2213-881/2022; etc.).*

49. In this respect, the case law of the Supreme Administrative Court of Lithuania has clarified that ***the information collected by the state authority examining an application for international protection, i.e. the Department, on the country of origin must comply with the essential criteria established in the provisions of the above-mentioned laws: all the facts to be assessed relating to the country of origin at the time of the decision on the application, including the laws and regulations of the country of origin and the manner in which they are applied, must be taken into account; accurate and up-to-date information should be obtained from a variety of sources, such as the European Refugee Fund, the European Asylum Support Office (now the European Union Support Agency), the United Nations High Commissioner for Refugees, and relevant international human rights organisations, on the general prevailing situation in the country of origin of the applicants and, where necessary, in the countries of transit****, and such information should be made available to the officials in charge of examining the applications and taking decisions. If, in a particular case of an application for international protection, it is established that the country of origin information collected does not meet the essential criteria which it should meet in accordance with the abovementioned legislation, the obligation of the state authority to cooperate with the applicant for international protection and to collect the supporting information may not be regarded as duly fulfilled (see, for example, Decision of the Supreme Administrative Court of Lithuania of 23 March 2022 in administrative case No eA-1685-968/2022, etc.).*"

In paragraphs 33-34 of its ruling of 10 August 2022 in administrative case No eA-3537-502/2022 the SACL stated:

„33. Evidence in an administrative case is all factual data accepted by the court hearing the case and on the basis of which according to the procedure laid down by law the court establishes that there are or are not circumstances supporting the claims and counterclaims of the parties to the proceedings and other circumstances relevant for the fair resolution of the case (Article 56(1) of the Law on Administrative Proceedings). The factual findings shall be established by the following means: explanations by the parties to the proceedings and their representatives, witness statements, expert statements and expert reports, physical evidence, documents and other written, electronic, audio and video evidence (Article 56(2) of the Law on Administrative Proceedings). No evidence shall have any pre-determined force before the court. The court shall assess the evidence in accordance with its own internal belief, based on a full, complete and objective examination of the totality of the circumstances of the case, in accordance with the law and the criteria of justice and reasonableness (Article 56(7) of the Law on Administrative Proceedings).

34. In the case law of the Supreme Administrative Court of Lithuania, the position is taken that the court's belief must be based on the examination and assessment of the evidence in the case that certain circumstances relating to the subject-matter of the dispute exist or do not exist. ***In assessing the evidence, the court must weigh the probative value of each piece of evidence and draw its conclusions from the evidence as a whole. The court must assess the probative value of the evidence and must conclude from it as a whole that certain facts which are the subject-matter of the evidence in a particular case do or do not exist. Furthermore, the court must, in each particular situation, decide on the sufficiency and reliability of the evidence in the case, assessing whether there are any contradictions between the evidence, whether secondary evidence supports the main evidence, whether the direct evidence is sufficient, and whether the secondary facts are consistent. When assessing evidence, the court must be guided not only by the rules of evidence, but also by the laws of logic, the criteria of justice, reasonableness and fairness*** *(see, e.g., Ruling of the Supreme Administrative Court of Lithuania of 8 February 2016 in administrative case No A-500-756/2016; Ruling of 8 August 2018 in administrative case No eA-4688-415/2018).“*

ENDNOTES

[1] See, e.g., UNHCR, Beyond Proof: Credibility Assessment in EU Asylum Systems: Full Report, May 2013, available at: http://www.refworld.org/docid/519b1fb54.html

[2] See, e.g.:
Bell, K. M., & Naugle, A. E. (2005). Understanding stay/leave decisions in violent relationships: A behavior analytic approach. Behavior and Social Issues, 14(1), 21–45. https://doi.org/10.5210/bsi.v14i1.119;
Buel, S. M. (1999). Fifty obstacles to leaving, a.k.a., why abuse victims stay. The Colorado Lawyer, 28(10), 19–28. http://www.ncdsv.org/images/50_Obstacles.pdf;
Halket, M.M., Gormley, K., Mello, N. et al. (2014). Stay With or Leave the Abuser? The Effects of Domestic Violence Victim's Decision on Attributions Made by Young Adults. J Fam Viol 29, 35–49. https://doi.org/10.1007/s10896-013-9555-4;
Rebecca L. Heron, Maarten Eisma & Kevin Browne. (2022). Why Do Female Domestic Violence Victims Remain in or Leave Abusive Relationships? A Qualitative Study, Journal of Aggression, Maltreatment & Trauma, 31:5, 677-694, https://doi.org/10.1080/10926771.2021.2019154

ANNEX:
SCIENTIFIC RATIONALE FOR DETECTION OF DECEIT (OVERVIEW [1])

People's ability to spot a lie is usually quite poor. On average, both lay people and professionals in their respective fields successfully distinguish lies from the truth only about 54% of the time, i.e. only a few percentage points above the 50/50 chance [2]. There are significant individual differences in people's behaviour, speech and physiological reactions [3]. Some people tend to make a lot of movements, others do not; some people are eloquent, others are not; some people show strong physiological reactions, others do not, etc. Therefore, simple heuristic rules such as "he does not show emotion, so he is lying" or "he does not talk much, so he is lying" do not work. Accordingly, in the absence of a common "truth" scale, the detection of deceit requires comparing the answers of the same interviewee to different questions in the same interview. This is what is done, for example, in polygraph examinations, but polygraph examinations focus heavily on the questions asked and there is currently no consensus as to which questions allow for an effective comparison of answers [4]. Moreover, polygraph examinations are concerned with monitoring physiological reactions, whereas the verbal (content) part is not covered.

Any detection of deceit, as far as comparing the answers of the same interviewee is concerned, requires first of all to establish a standard "baseline", i.e. how a given person behaves when he or she tells the truth. Deviations from such a "baseline" can then be considered as signs of deceit. In assessing non-verbal reactions, certain interviewing techniques recommend starting the interview with a neutral topic [5] or inserting neutral questions into the interview [6] and, by observing the interviewee's behaviour in answering such questions, identifying his or her "normal" behavioural pattern, i.e. the "baseline". However, research shows that establishing a "baseline" by such means can lead to erroneous conclusions [7], as all people behave differently on topics that are potentially not likely to have negative consequences for them, and on topics where their fate may depend on being believed [8]. In other words, the same person behaves differently in different situations. People react differently: in formal versus informal situations [9]; when they are accused of something versus when their story is not questioned [10]; and when talking to different interviewers [11]. Moreover, people's behaviour during the interview depends on the topic being discussed: they will behave differently when talking about sensitive topics compared to neutral topics [12], or topics that are important to them compared to topics that do not interest them [13]. Finally, behaviour may change over time and this change may occur both in the same interview [14], and in a subsequent interview [15]. The research [16] evaluated the behaviour of liars and truth-tellers and found no empirical justification for the non-verbal "baseline" method. In other words, the distinction between truth and lies based on non-verbal characteristics is not supported by scientific research and does not constitute a reliable technique to support conclusions on the credibility of a story. At this point in time, it is unlikely that a reliable method for establishing a "baseline" of (non-verbal) behaviour in truth-telling will emerge in the near future, as interviewers often do not know with certainty exactly which details provided by the interviewee are true when discussing the circumstances relevant to the investigation.

Verbal lie detection methods face similar problems. In practice, formally defined lie detection methods such as Statement Validity Assessment (SVA) [17] and Scientific Content Analysis (SCAN) [18] are used. The SCAN method does not take into account the natural individual differences between different people at all. The SVA approach recognises these differences and consists of several steps: Criteria-Based Content Analysis (CBCA) and a Validity Checklist. The CBCA is made up of 19 criteria identified in the narrative. Finally, the narrative is scored on a scale from 0 (no criteria identified) to 19 (all criteria identified). The higher the score, the more likely it is that the story is true. In order to account for natural differences between people, an additional validity checklist is applied, consisting of factors that could potentially influence the CBCA score, e.g. age, development, suggestibility, quality of interview. The evaluator must take all these factors into account and decide whether they can explain the CBCA score. But this assessment is a difficult task, as some factors are difficult to measure (e.g. the suggestibility of the person), and even if one is able to do so, it is difficult to assess their exact impact (e.g. the quality of the interview). Accordingly, the validity check procedure is much more subjective compared to the CBCA part and may lead to different results depending on the expert who applies it [19]. In summary, the currently used verbal lie detection methods are not universal and do not allow to distinguish the truth from the lies with certainty. It should be noted that these are scientifically based methods that follow well-defined protocols and established criteria. As concerns the distinction between lies and the truth "by eye", on the basis of intuition and/or experience, as mentioned above, both lay people and professionals from the relevant fields show a result that is no more reliable than a simple 50/50 chance.

In contrast to lie detection based on non-verbal (behavioural) features, the possibility of developing reliable methods for verbal analysis is more optimistic. In recent years, scholars have devoted considerable attention to investigating techniques such as cognitive lie detection (consisting of 3 elements: increasing cognitive load, encouraging to tell more, asking unexpected questions) [20], the verifiability technique [21] and the strategic use of evidence [22]. The reliability of these methods has been empirically confirmed but their application in practice remains problematic. These types of methods would be most effective if truth-tellers and liars exhibited genuinely different response patterns, e.g. if truth-tellers always included more verifiable details than unverifiable ones, and liars – vice versa, but this is not the case in real life [23]. Research only confirms that truth-tellers generally include more verifiable details in their stories than liars. The expert is then left with the question: when are there enough verifiable details to confidently conclude that a given interviewee is telling the truth? Science does not provide an answer to this and other similar questions.

In summary, despite the research in this area, there is no reliable formal protocol based on empirical data that allows practitioners in the relevant fields, including the processing of asylum applications, to confidently distinguish between lies and truth. Accordingly, any attempts to do so, especially on the basis of intuition and vague verbal criteria (e.g. "level of detail" [24] and "consistency" [25]), not to mention the assessment of non-verbal elements, are essentially speculative and do not serve to support any unambiguous conclusions.

ENDNOTES

[1] In general based on: Vrij, A. (2008). Detecting lies and deceit: Pitfalls and opportunities, second edition. Chichester: John Wiley and Sons; Vrij, A. (2016). Baselining as a lie detection method. Applied Cognitive Psychology, 30(6), 1112–1119. https://doi.org/10.1002/acp.3288

[2] Bond, C. F., Jr., & DePaulo, B. M. (2006). Accuracy of deception judgments. Personality and Social Psychology Review, 10(3), 214-234. https://doi.org/10.1207/s15327957pspr1003_2; Bond, C. F., & DePaulo, B. M. (2008). Individual differences in judging deception: Accuracy and bias. Psychological Bulletin, 134(4), 477–492. https://doi.org/10.1037/0033-2909.134.4.477

[3] DePaulo, B. M., & Friedman, H. S. (1998). Nonverbal communication. In D. T. Gilbert, S. T. Fiske, & G. Lindzey (Eds.), The handbook of social psychology (pp. 3-40). Boston, MA: McGraw-Hill.

[4] Ben-Shakhar, G. (2008). The case against the use of polygraph examinations to monitor post-conviction sex offenders. Legal and Criminological Psychology, 13, 191-207. https://doi.org/10.1348/135532508X298577; Grubin, D. (2008). The case for polygraph testing of sex offenders. Legal and Criminological Psychology, 13, 177-189. https://doi.org/10.1348/135532508X295165; Vrij, A. (2008). Detecting lies and deceit: Pitfalls and opportunities, second edition. Chichester: John Wiley and Sons.

[5] Inbau, F. E., Reid, J. E., Buckley, J. P., & Jayne, B. C. (2013). Criminal interrogation and confessions, 5th edition. Burlington, MA: Jones & Bartlett Learning, p. 140

[6] Frank, M. G., Yarbrough, J. D., & Ekman, P. (2006). Investigative interviewing and the detection of deception. In T. Williamson (Ed.), Investigative interviewing: Rights, research and regulation (pp. 229-255). Cullompton, Devon: Willan Publishing

[7] Moston, S. J., & Engelberg, T. (1993). Police questioning techniques in tape recorded interviews with criminal suspects. Policing and Society, 6, 61-75. https://doi.org/10.1080/10439463.1993.9964670

[8] Hartwig, M., & Bond, C. F. (2014). Lie detection from multiple cues: A meta-analysis. Applied Cognitive Psychology, 28, 661-667. https://doi.org/10.1002/acp.3052

[9] Vrij, A. (2008). Detecting lies and deceit: Pitfalls and opportunities, second edition. Chichester: John Wiley and Sons.

[10] Vrij, A. (2006). Challenging interviewees during interviews: The potential effects on lie detection. Psychology, Crime, & Law, 12, 193-206. https://doi.org/10.1080/10683160512331331319

[11] Vrij, A., & Winkel, F. W. (1991). Cultural patterns in Dutch and Surinam nonverbal behavior: An analysis of simulated police/citizen encounters. Journal of Nonverbal Behavior, 15, 169-184. https://doi.org/10.1007/BF01672219

[12] Kleinke, C. L. (1986). Gaze and eye contact: A research review. Psychological Bulletin, 100, 78-100. https://doi.org/10.1037/0033-2909.100.1.78

[13] Matarazzo, J. D., Wiens, A. N., Jackson, R. H., & Manaugh, T. S. (1970). Interviewee speech behavior under conditions of endogenously-present and exogenously-induced motivational states. Journal of Clinical Psychology, 54, 15-26. https://doi.org/10.1037/h0028651

[14] Buller, D. B., & Burgoon, J. K. (1996). Interpersonal deception theory. Communication Theory, 6, 203-242. https://doi.org/10.1111/j.1468-2885.1996.tb00127.x; Burgoon, J. K., Buller, D. B.,White, C. H., Afifi,W., & Buslig, A. L. (1999). The role of conversational involvement in deceptive interpersonal interactions. Personality and Social Psychology Bulletin, 25, 669-686. https://doi.org/10.1177/0146167299025006003; White, C. H., & Burgoon, J. K. (2001). Adaptation and communicative design: Patterns of interaction in truthful and deceptive conversations. Human Communication Research, 27, 9-37. https://doi.org/10.1111/j.1468-2958.2001.tb00774.x

[15] Granhag, P. A., & Strömwall, L. A. (2002). Repeated interrogations: Verbal and nonverbal cues to deception. Applied Cognitive Psychology, 16, 243-257. https://doi.org/10.1002/acp.784

[16] Ewens, S, Vrij, A., Jang, M, & Jo, E. (2014). Drop the small talk when establishing baseline behaviour in interviews. Journal of Investigative Psychology and Offender Profiling, 11, 244-252. https://doi.org/10.1002/jip.1414

[17] Köhnken, G., & Steller, M. (1988). The evaluation of the credibility of child witness statements in German procedural system. In G. Davies & J. Drinkwater (Eds.), The child witness: Do the courts abuse children? (Issues in Criminological and Legal Psychology, no. 13) (pp. 37-45). Leicester, United Kingdom: British Psychological Society; Steller, M., & Köhnken, G. (1989). Criteria-Based Content Analysis. In D. C. Raskin (Ed.), Psychological methods in criminal investigation and evidence (pp. 217-245). New York: Springer-Verlag

[18] Sapir, A. (1987/2000). The LSI course on scientific content analysis (SCAN). Phoenix, ZA: Laboratory for Scientific Interrogation; Vrij, A. (2008). Detecting lies and deceit: Pitfalls and opportunities, second edition. Chichester: John Wiley and Sons

[19] Steller, M. (1989). Recent developments in statement analysis. In J. C. Yuille (1989). Credibility Assessment (pp. 135-154). Deventer, the Netherlands: Kluwer; Steller, M., & Köhnken, G. (1989). Criteria-Based Content Analysis. In D. C. Raskin (Ed.), Psychological methods in criminal investigation and evidence (pp. 217-245). New York: Springer-Verlag; Gumpert, C. H., & Lindblad, F. (1999). Expert testimony on child sexual abuse: A qualitative study of the Swedish approach to statement analysis. Expert Evidence, 7, 279-314; Vrij, A. (2008). Detecting lies and deceit: Pitfalls and opportunities, second edition. Chichester: John Wiley and Sons

[20] Vrij, A. (2015). A cognitive approach to lie detection. In P. A. Granhag, A. Vrij, & B. Verschuere (Eds.), Deception detection: Current challenges and new approaches (pp. 205-229). Chichester, England: Wiley; Vrij, A., Fisher, R., Blank, H. (2015). A cognitive approach to lie detection: A meta-analysis. Legal and Criminological Psychology. https://doi.org/10.1111/lcrp.12088; Vrij, A., Leal, S., Mann, S., Vernham, Z., & Brankaert, F. (2015). Translating theory into practice: Evaluating a cognitive lie detection training workshop. Journal of Applied Research in Memory and Cognition, 4, 110-120. https://doi.org/10.1016/j.jarmac.2015.02.002

[21] Vrij, A., Nahari, G., Isitt, R., & Leal, S. (2016). Using the verifiability lie detection approach in an insurance claim setting. Journal of Investigative Psychology and Offender Profiling. https://doi.org/10.1002/jip.1458; Vrij, A., Taylor, P. J., Picornell, I. (2015). Verbal lie detection. G. Oxburgh, T. Grant, T. Myklehust, B. Milne (Eds.) Communication in Investigative and Legal Contexts: Integrated Approaches from Forensic Psychology, Linguistics and Law Enforcement. John Wiley & Sons

[22] Granhag, P. A., & Hartwig, M. (2015). The Strategic Use of Evidence (SUE) technique: A conceptual overview. In P. A. Granhag, A. Vrij, & B. Verschuere (Eds.), Deception detection: Current challenges and new approaches (pp. 231-251). Chichester, England: Wiley; Hartwig, M., Granhag, P. A., & Luke, T. (2014). Strategic use of evidence during investigative interviews: The state of the science. In: Raskin, D.C., Honts, C.R., Kircher, J.C. (Eds.), Credibility Assessment: Scientific Research and Applications (pp. 1-36). Oxford, UK: Academic Press

[23] Nahari, G., & Vrij, A. (2015). Systematic errors (biases) in applying verbal lie detection tools: richness in detail as a test case. Crime Psychology Review, 1, 98-107; Nahari, G., Vrij, A., & Fisher, R. P. (2014). Exploiting liars' verbal strategies by examining the verifiability of details. Legal and Criminological Psychology, 19, 227-239, https://doi.org/10.1111/j.2044-8333.2012.02069.x

[24] **Research shows that "level of detail" per se, i.e., the total amount of detail provided, depends not only on the veracity of the narrative but also on individual differences (eloquence) and on preparation (prepared, considered answers will be longer and more detailed than spontaneous ones). The diagnostic value is potentially not in the total number of details but in the presence/absence of certain types of details, which means, among other things, that "level of detail" is a qualitative rather than a quantitative indicator, and that the ability to distinguish between different types of details, to qualify and evaluate different details is necessary when considering the "level of detail" in the narrative. Furthermore, studies show that interviewees provide less detail when the interview is conducted through a translator. This is an additional factor to bear in mind when deciding on the level of detail in the narrative**.
See, e.g.: Vrij, A., Leal, S., Mann, S., Dalton, G. Jo, E., Shaboltas, A., Khaleeva, M., Granskaya, J., & Houston, K. (2017). Using the Model Statement to elicit information and cues to deceit in interpreter-based interviews. Acta Psychologica, 177, 44-53. https://doi.org/10.1016/j.actpsy.2017.04.011; Vrij, A., Leal, S., Fisher, R. P., Mann, S., Dalton, G. Jo, E., Shaboltas, A., Khaleeva, M., Granskaya, J., & Houston, K. (2018). Sketching as a technique to elicit information and cues to deceit in interpreter-based interviews. Journal of Applied Research in Memory and Cognition, 7, 303-313.

https://doi.org/10.1016/j.jrarmac.2017.11.001; Vrij, A., Leal, S., Jupe, L., & Harvey, A. (2018). Within-subjects verbal lie detection measures: A comparison between total detail and proportion of complications. Legal and Criminological Psychology. https://doi.org/10.1111/lcrp.12126; Vrij, A., Leal, S., Mann, S., Fisher, R. P., Dalton, G. Jo, E., Shaboltas, A., Khaleeva, M., Granskaya, J., & Houston, K. (2018). Using unexpected questions to elicit information and cues to deceit in interpreter-based interviews. Applied Cognitive Psychology, 32, 94-104. https://doi.org/10.1002/acp.3382; Vrij, A., Leal, S., Fisher, R. P., Mann, S., Jo, E., Shaboltas, A., Khaleeva, M., Granskaya, J., Houston, K. (2019). Eliciting information and cues to deceit through sketching in interpreter-based interviews. Applied Cognitive Psychology. https://doi.org/10.1002/acp.3566

[25] **Both professionals and lay people tend to believe that "consistency" has a diagnostic value in distinguishing truth from lies. That is to say, they believe that consistency of narrative is a sign of truth and inconsistency is a sign of lies. Meanwhile, research shows just the opposite - that truthful stories are no more, and sometimes even less, consistent than false ones**.

See, e.g.: Granhag, P. A., & Strömwall, L. A. (2002). Repeated interrogations: Verbal and non-verbal cues to deception. Applied Cognitive Psychology, 16(3), 243–257. https://doi.org/10.1002/acp.784; Strömwall, L. A., & Granhag, P. A. (2005). Children's repeated lies and truths: effects on adults' judgments and reality monitoring scores. Psychiatry, Psychology and Law, 12(2), 345–356. https://doi.org/10.1375/pplt.12.2.345; Vredeveldt, A., van Koppen, P. J., & Granhag, P. A. (2014). The inconsistent suspect: A systematic review of different types of consistency in truth tellers and liars. In R. Bull (Ed.), Investigative interviewing (pp. 183–207). Springer Science + Business Media. https://doi.org/10.1007/978-1-4614-9642-7_10

Lietuvos
Raudonasis
Kryžius

Konstitucijos pr. 7A, PC Europa, III a.
Vilnius, LT-09307
+370 659 71 598
info@redcross.lt