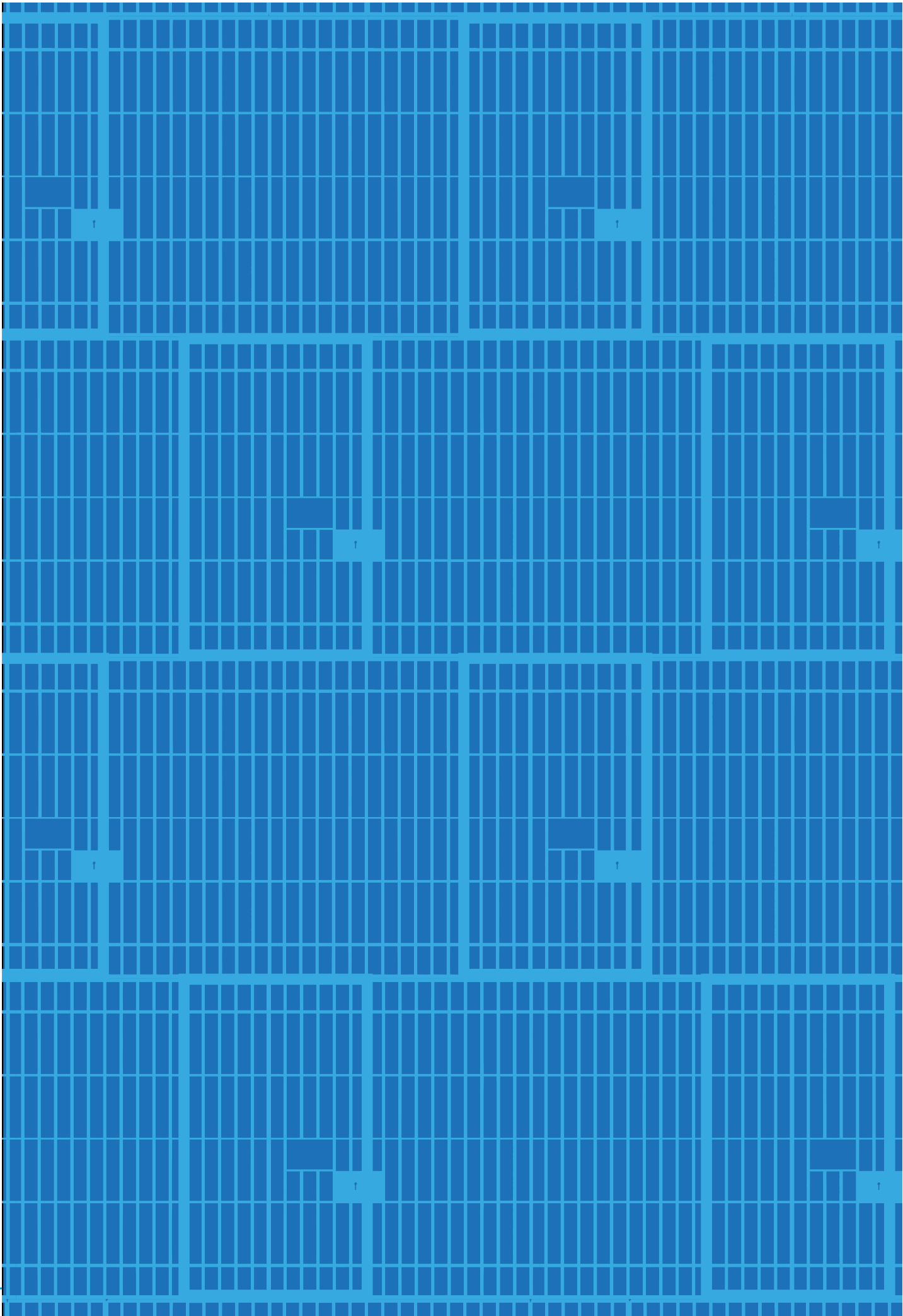


Annexes



Annex 1

Summary of the qualitative responses to the UNODC questionnaire on corruption in prison systems

Introduction

This annex provides a consolidated overview of Member State submissions received in response to the questionnaire on preventing corruption in prison systems through corruption risk management. The analysis is based exclusively on information provided in the questionnaire responses and related attachments supplied by 37 responding States¹ before the specified deadline. It reflects the diversity of prison governance models and integrity frameworks, ranging from centralized prison administrations to federal or devolved arrangements where prison management is primarily the responsibility of subnational authorities.

The majority of the submissions did not request confidentiality. Where a Member State explicitly indicated that specific material was confidential, restricted or not publicly available, those elements were not reproduced and are reflected only in general terms.

Legal and policy frameworks

Across the submissions, most Member States reported that prison integrity measures are anchored in general national anti-corruption laws, criminal law provisions addressing bribery and abuse of office and public service ethics frameworks applicable to prison personnel. Many jurisdictions referenced national anti-corruption strategies, integrity agendas or public sector

¹The 37 responding States include Botswana, Brazil, Bulgaria, Burundi, Chad, Chile, Colombia, Costa Rica, Côte d'Ivoire, Dominican Republic, Ecuador, France, Germany, Ghana, Guyana, Hungary, Ireland, Japan, Kingdom of Morocco, Lithuania, Madagascar, Malaysia, Mali, Malta, Myanmar, Republic of North Macedonia, Niger, Poland, Qatar, Romania, Singapore, Slovakia, Slovenia, Spain, Thailand, Uganda, and United Kingdom of Great Britain and Northern Ireland.

governance models that extend to the prison sector. In several cases, Member States indicated that these frameworks are complemented by prison-specific instruments, including prison laws, service rules, internal regulations and conduct and discipline instructions applicable to correctional staff.

Many respondents described ethics frameworks as a core element of the institutional architecture supporting integrity in prisons, typically operating through formal codes of conduct and related implementing measures such as mandatory training, dissemination requirements or staff declarations. Some jurisdictions emphasized dedicated sectoral policy instruments, including prison integrity or corruption prevention plans, while others reported that prison integrity is addressed within broader justice sector reforms. Several Member States highlighted whistle-blower protection legislation as part of the legal framework relevant to reporting and accountability, even where prison-specific reporting procedures were still under development.

Institutional structures and coordination

Member States reported a wide range of institutional arrangements for overseeing integrity and corruption risks in prisons. In many jurisdictions, prison administrations maintain internal oversight bodies such as inspectorates, internal affairs units, preventive security functions, integrity units, disciplinary boards or audit structures. These internal mechanisms frequently operate alongside external oversight institutions, including prosecutors, police investigative units, national anti-corruption agencies, audit bodies, ombuds institutions and national human rights mechanisms. Several submissions also referred to international or independent monitoring arrangements, including visiting mechanisms and preventive monitoring bodies.

A number of countries described specialized counter-corruption capacities within prison administrations, including designated local managers in each prison supported by a central counter-corruption unit or integrity committees established at institutional and headquarter levels. Several submissions highlighted coordination with prosecution authorities and law enforcement bodies as standard practice for corruption-related cases. In federal or devolved systems, Member States emphasized that institutional arrangements and implementation measures vary across jurisdictions but are generally embedded in broader public administration integrity frameworks.

Risk identification and assessment mechanisms

Approaches to corruption risk identification and assessment vary considerably among responding States. Some Member States reported formal, periodic corruption risk assessments, including risk mapping exercises, risk registers, annual integrity risk assessments and structured methodologies supported by national risk management guidance. In several cases, Member States described dedicated risk assessments conducted within prison administrations, supported by action plans and follow-up reviews.

Other respondents indicated that corruption risk identification is primarily achieved through inspections, audits, intelligence-led monitoring, incident analysis and complaint handling rather than through systematic risk assessment frameworks. Several countries described annual inspection systems or supervisory plans that serve as practical mechanisms for identifying vulnerabilities. A number of submissions explicitly stated that prison sector corruption risk

assessments had not yet been conducted but were planned, while others reported uncertainty regarding whether prisons are included in national integrity assessments.

Across responses, recurring risk areas include the facilitation of contraband, unauthorized communications, misuse of authority in relation to privileges or prisoner management, corruption in procurement and contracting, and inappropriate relationships or undue familiarity between staff and detainees. Several submissions identified organized criminal groups and prisoners with significant external influence or financial resources as heightened risk factors. Some jurisdictions highlighted risks associated with staff pressure, threats or manipulation by criminal networks and several noted that prison overcrowding and constrained operating environments may further increase vulnerability to corruption.

Preventive measures and integrity safeguards

Most Member States reported a combination of preventive and control measures aimed at reducing opportunities for corruption and strengthening a culture of integrity. Human resource measures are prominent across submissions, including competitive recruitment processes, screening or vetting at recruitment and, in some cases, continuous vetting, integrity testing, asset or conflict-of-interest declarations, job rotation, mandatory leave policies or restrictions on staff assignments where personal connections to detainees exist. Many submissions emphasized ethics training and awareness-raising as central preventive tools, often delivered through dedicated training institutes, e-learning platforms or training-of-trainers approaches.

Operational controls were frequently reported as key safeguards, including standard operating procedures for searches, visits, communications, prisoner movements, handling of money or accounts and controls over access to restricted areas or items. Several Member States described increasing reliance on technology and digital systems, such as surveillance systems, electronic controls, cashless systems, e-procurement platforms and digital record-keeping, to strengthen transparency and reduce discretionary vulnerabilities. In a number of submissions, the existence of internal audits, procurement controls and multi-person authorization mechanisms was described as integral to reducing risks in high-exposure functions.

While the above measures were commonly reported, the level of detail varied substantially. Some responses provided comprehensive descriptions of preventive systems and institutional safeguards, while others provided only limited information, indicating either that measures are under development or that detailed documentation was not provided in the submission.

Reporting, enforcement and accountability

Member States reported a range of reporting channels for suspected corruption or misconduct. Many submissions described internal reporting mechanisms within prison administrations, including confidential reporting channels, complaint boxes, reporting to supervisors or integrity units, and formal grievance processes available to prisoners. External reporting channels were also frequently reported, including reporting to anti-corruption agencies, police, prosecutors, ombuds institutions, national audit bodies or designated public sector reporting platforms.

Whistle-blower protection frameworks were reported by many Member States, often anchored in national legislation. Some respondents described active enforcement or structured protection arrangements, while others indicated that anonymity and protection require further strengthening or formalization. Several submissions reported that corruption allegations may lead to disciplinary proceedings, criminal investigations, or both, with disciplinary and judicial processes sometimes operating in parallel. A number of Member States provided examples of cases resulting in sanctions, dismissals or prosecutions, while others reported that such information is not publicly disclosed or systematically reflected in national statistics.

Several responses highlighted that reporting is constrained by fear of retaliation, limited trust or cultural barriers and noted that strengthening safe reporting channels and whistle-blower protections remain a priority. Some submissions reported the presence of dedicated investigative support, including specialized units, designated investigators or close coordination with prosecution authorities.

Promising practices and lessons learned

Member States reported a variety of promising practices, though the depth of information varied. Several jurisdictions highlighted the institutionalization of integrity structures, including dedicated counter-corruption units, integrity committees, corruption prevention committees and centralized internal investigation functions. Others emphasized structured integrity planning and risk registers as a practical governance tool to guide prevention and mitigation measures.

A number of respondents identified technology-based interventions as helpful, including enhanced surveillance, monitoring systems, digital procurement and cashless systems designed to reduce opportunities for corruption and improve traceability. Several submissions highlighted structured learning approaches, including lessons learned reviews, anonymized case studies, pilot initiatives and staff engagement programmes to strengthen ethical culture and reporting confidence.

Some Member States emphasized values-based initiatives and organizational culture reforms, including mission and values exercises, moral organization programmes and measures aimed at strengthening psychological safety, ethical awareness and managerial accountability. Several submissions pointed to strengthened cooperation with law enforcement, anti-corruption bodies and prosecutors, including joint training and improved referral pathways, as an important enabling factor. A smaller number of responses indicated that no case studies or good practices were available for sharing at the time of submission.

Challenges and technical assistance needs

Across responses, Member States identified recurring challenges affecting corruption prevention in prison settings. Resource constraints are a common theme, including staff shortages, insufficient funding, limited training capacity, outdated infrastructure and inadequate monitoring technology. Many submissions associated corruption vulnerability with overcrowding and operational pressures that constrain supervision and reduce opportunities for staff rotation and training.

Several Member States highlighted the influence of organized criminal groups, the demand for contraband and the risks of staff intimidation or coercion as persistent challenges. A number of submissions emphasized cultural and institutional factors, including tolerance of corruption, weak reporting culture, fear of victimization, insufficient trust in institutions and inconsistent enforcement as obstacles to effective prevention. Some respondents specifically highlighted the human factor, including staff vulnerability linked to financial pressures, lifestyle aspirations or weak professional discipline.

Technical assistance needs reported by Member States are broadly consistent across regions. Many expressed interest in practical guidance manuals, training modules including e-learning, risk assessment and mitigation templates, self-assessment tools, internal audit tools and advisory support to develop integrity policies, codes of conduct and whistle-blower mechanisms. Peer exchange, twinning and international experience sharing were frequently requested as mechanisms to support learning and adaptation of effective practices. Several Member States emphasized the need for capacity-building targeted to prison staff and managers, including training on professional boundaries, integrity leadership and corruption risk management methods.

Conclusion

Taken together, the submissions show that Member States are addressing corruption risks in prisons primarily through a combination of legal frameworks applicable to public officials, internal administrative controls and oversight mechanisms that blend internal prison accountability with external investigative and supervisory functions. The maturity of corruption risk management systems varies considerably, from jurisdictions reporting structured annual risk assessments and dedicated integrity units to those reporting limited preventive infrastructure or incomplete risk assessment coverage.

The responses also highlight that prisons remain a high-risk environment for corruption due to the combination of restricted settings, significant discretionary authority, organized crime influence and resource pressures. Member States' reported needs point consistently towards practical tools, strengthened institutional capacity, safe reporting mechanisms and peer learning opportunities. These findings collectively underscore the importance of sustained investment in institutional integrity, professional training and risk-based management approaches tailored to custodial environments, while ensuring that measures are feasible under operational constraints and aligned with human rights and the rule of law.

Annex 2

Corruption-related practical tools and templates from Member States

Template 1: Corruption risk identification

This template can be used for Step 2 of the corruption risk management (CRM) process: risk identification. The objective is to identify a list of corruption risks to which the organization is or might be exposed to.

The “organizational function” column refers to the specific processes or areas within the organization. For example, HR, licensing, procurement, monitoring, etc. Under the column “corruption risk” the challenges, scenarios, weaknesses that might take place within each organizational function should be listed.

ORGANIZATIONAL FUNCTION	CORRUPTION RISK
Example: Procurement	Example: Public officials are offered bribes by private companies to improperly award contracts

Template 2: Corruption risk impact analysis

This template can be used for Step 3 of the CRM process: corruption risk impact analysis. The objective is to classify the impact that a risk might have on mandate, finances and reputation of the organizations.

The “corruption risk” column includes the corruption risks identified in the template. It ensures that the risks are clearly and specifically described. In the “categorization” column select one or more categories that best reflect the nature of each risk:

- Mandate (M): Risks that affect the ability of the organization to deliver on its core mandate, services or mission.
- Financial (F): Risks resulting in direct or indirect financial loss or inefficiencies.
- Reputation (R): Risks that could undermine the organization's credibility, integrity or public trust.

A single risk may fall under more than one category.

ORGANIZATIONAL FUNCTION	CORRUPTION RISK	CATEGORIZATION: FINANCIAL; MANDATE; REPUTATION
Procurement	Public officials are offered bribes by private companies to improperly award contracts	Financial: Overspending of public funds on goods or services that could have been acquired at a fair market price or loss of money due to the purchase of substandard services or goods provided Reputation: Stakeholders, including fishing communities and donors, could perceive the organization as inefficient or corrupt, thus eroding public trust. Drop in participation and quality over time as suppliers and contractors lose confidence in fairness of procurement processes

Template 3: Corruption risk prioritization

This template can be used for Step 4 of the CRM process: corruption risk prioritization. This step prioritizes the risks that require immediate attention.

Risk prioritization is based on an assessment of the nature of the risk (categorization); the severity of potential impact and the likelihood of occurrence, which together determine the overall rating.

The “corruption risk” column includes the corruption risks identified in Template 1. Ensure the risks are clearly and specifically described. In the “categorization” column indicate the categorization of the risk as conducted in Template 2. The “impact severity” column includes the assessment of the potential consequences of the risk if it materialized. An indication of how the scores can be assigned is as follows:

- A high score (H-3) can indicate severe operational disruption, significant financial loss, serious legal or disciplinary consequences;
- A medium score (M-2) can indicate moderate financial loss and manageable but significant consequences;
- A low score (L-1): can indicate minor operational disruption, limited financial loss, localized or short-term reputational impact.

The “likelihood” column assesses the probability that the risk will occur given the current control environment and can be scored using the following reference:

- A high score (H-3) can indicate the risk is likely to occur or has happened frequently;
- A medium score (M-2) can indicate possible occurrence or past isolated incidents;
- A low score (L-1) can indicate that the risk is unlikely to occur and no known history of occurrence.

The “overall rating” is calculated by multiplying the *impact* (1–3) $\times$ *likelihood* (1–3). This results in a score between 1 and 9. The risks that have received a score of 6 or 9 are considered high priority and require immediate attention.

CORRUPTION RISK	CATEGORIZATION • Mandate (M) • Financial (F) • Reputation (R)	IMPACT SEVERITY • High (H-3) • Medium (M-2) • Low (L-1)	LIKELIHOOD • High (H-3) • Medium (M-2) • Low (L-1)	OVERALL RATING • High (6 or 9) • Medium (3 or 4) • Low (1 or 2)
Example: Procurement—Public officials are offered bribes by private companies to improperly award contracts	Financial Mandate Reputation	High-3	Low-1	Medium-3

Template 4: Cause identification

This template can be used for Step 5 of the CRM process: corruption risk mitigation. The objective is to identify and analyse the underlying causes—gaps, weaknesses or vulnerabilities—that enable each corruption risk to occur. This step helps ensure that future mitigation measures address the root causes rather than only the symptoms.

Guidance: In the “cause” column list the specific reasons or circumstances that create the opportunity for the corruption risk. Causes may include:

- Weak internal controls
- Excessive discretion with no oversight
- Lack of automation/digitization
- Inadequate policies or enforcement
- Conflicts of interest
- Lack of accountability or transparency
- Weak integrity and unethical behaviour
- Inadequate training and capacity

Each risk may have several causes, list them separately (one cause per row).

In the column “is there a control mechanism?” determine whether any existing policy, procedure, system or physical measure is in place to prevent or detect the risk. Also, specify what is the control system in place being specific and not generic.

In the column “is staff capacity adequate?” evaluate whether staff have a sufficient number of personnel, necessary technical skills and knowledge or time and resources to implement controls effectively.

RISK	CAUSE	IS THERE A CONTROL MECHANISM? [Yes/No] If Yes, which?	IS THE CONTROL ADEQUATE? [Yes/No]	IS STAFF CAPACITY ADEQUATE? [Yes/No]
Example: <i>Procurement</i> —Public officials are offered bribes by private companies to improperly award contracts	The current system is manual	Yes National procurement system	No	No
	There is poor supervision	Yes Supervision manual for tender awarding	No	No

Template 5: Mitigation plan

This template can be used for Step 5 of the CRM process: corruption risk mitigation. The objective is to develop practical strategies to reduce, manage or eliminate the causes of corruption risks. This step ensures the organization implements concrete actions and assigns responsibility to relevant stakeholders within the organization.

In column “risk”, copy the corruption risk from Template 2. Work on *one* risk per section to ensure targeted actions.

In column “cause”, list each cause analysed in Template 3. Each cause should link to a specific mitigation action.

In column “mitigation strategy”, describe the action to be taken to address the cause. Each cause may require one or multiple actions.

In column “verifiable indicator”, define how progress will be measured. Use SMART indicators: *Specific, Measurable, Achievable, Relevant, Time-bound*.

Examples:

- “Automated contract evaluation system operational and used by all relevant staff”
- “SOP approved and monitored quarterly”
- “100 per cent of targeted staff trained”

In column “responsible”, identify the position(s) or unit(s) accountable for implementation—not specific individuals.

In column “timelines”, specify when the action is expected to be completed. Example formats include:

- End of Q3 20XX
- Within six months
- Ongoing or quarterly review

In column “resources required” estimate the budget, personnel, tools or technical assistance needed.

RISK	CAUSE	MITIGATION STRATEGY	VERIFIABLE INDICATOR	RESPONSIBLE	TIMELINES	RESOURCES REQUIRED
Example: <i>Procurement</i> —Public officials are offered bribes by private companies to improperly award contracts	Current system is manual	Implement an automated system to evaluate and award contracts	Automated contract evaluation system operational and in use by all relevant staff	• Head of procurement • Head of information and communications technology (ICT)	End of Q2 20XX	US\$ 50,000/year
	Poor supervision	Conduct a comprehensive review of the tender process to ensure appropriate controls are in place	Approved SOP for tenders is available and staff trained on its use	• Head of procurement	End on Q3 20XX	Consultant to review current policy and manual (US\$8,000) (one time)

Annex 3

United Nations Office on Drugs and Crime (UNODC) publications referenced in the Guide

UNODC (2008). *Handbook on Prisoner File Management*. Criminal Justice Handbook Series.

UNODC (2009). *Handbook on Prisoners with Special Needs*. Criminal Justice Handbook Series.

UNODC (2009). *Technical Guide to the United Nations Convention against Corruption*.

UNODC (2010). *Handbook for Prison Leaders*. Criminal Justice Handbook Series.

UNODC (2013). *Handbook on Strategies to Reduce Overcrowding in Prisons*. Criminal Justice Handbook Series.

UNODC (2013). *Guidebook on anti-corruption in public procurement and the management of public finances: Good practices in ensuring compliance with article 9 of the United Nations Convention against Corruption*.

UNODC (2015). *Handbook on Dynamic Security and Prison Intelligence*. Criminal Justice Handbook Series.

UNODC (2016). *Handbook on the Management of High-Risk Prisoners*. Criminal Justice Handbook Series.

UNODC (2016). *Handbook on the Management of Violent Extremist Prisoners and the Prevention of Radicalization to Violence in Prisons*. Criminal Justice Handbook Series.

UNODC (2018). *Assessing Compliance with the Nelson Mandela Rules: A checklist for internal inspection mechanisms*. Criminal Justice Handbook Series.

UNODC (2018). *Handbook on Anti-Corruption Measures in Prisons*. Criminal Justice Handbook Series.

UNODC (2018). *Introductory Handbook on the Prevention of Recidivism and the Social Reintegration of Offenders*. Criminal Justice Handbook Series.

UNODC (2020). *Handbook on the Classification of Prisoners*. Criminal Justice Handbook Series.

UNODC (2020). *The Time is Now: Addressing the Gender Dimensions of Corruption*.

UNODC (2020). *State of Integrity: A Guide on Conducting Corruption Risk Assessments in Public Organizations*.

UNODC (2026). *Handbook on the Use of Technology in Prison Settings*. Criminal Justice Handbook Series.