

Chapter 3

Corruption prevention through corruption risk management

3.1 Approach to corruption risk management

This chapter describes the main steps of a corruption risk management process.⁴⁹ It follows the guidance in the UNODC publication *State of Integrity: A Guide on Conducting Corruption Risk Assessments in Public Organizations*,⁵⁰ while offering a corruption risk assessment and mitigation process that specifically reflects the needs of prison systems. It is thereby intended to enrich Member States' efforts in this regard: 67 per cent of the respondents to the UNODC questionnaire indicated that their prison services had conducted some type of a corruption risk assessment.⁵¹ Corruption risk management should be embedded within the prison service's internal governance and risk management processes, however this should also be complemented by external and independent oversight.

Figure 1 illustrates the corruption risk management process described in this Guide.⁵²

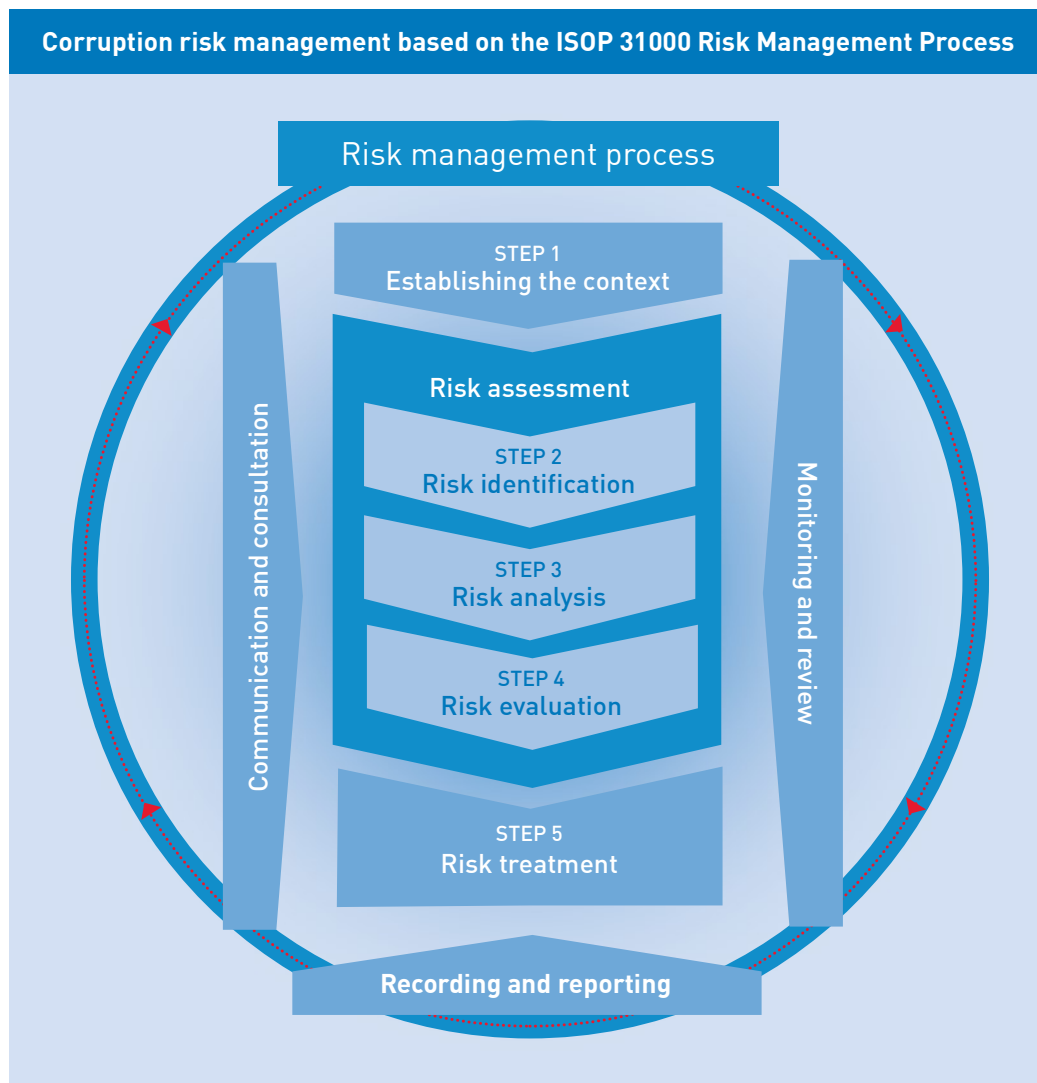
⁴⁹ The methodology used is based on the International Standards Organization (ISO) Risk Management Guidelines (ISO 31000:2018).

⁵⁰ UNODC (2020). *State of Integrity—A Guide on Conducting Corruption Risk Assessments in Public Organizations*.

⁵¹ UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]

⁵² The corruption risk management process is in line with the International Standards Organization (ISO) Risk Management Guidelines (ISO 31000:2018 and ISO 37001:2025).

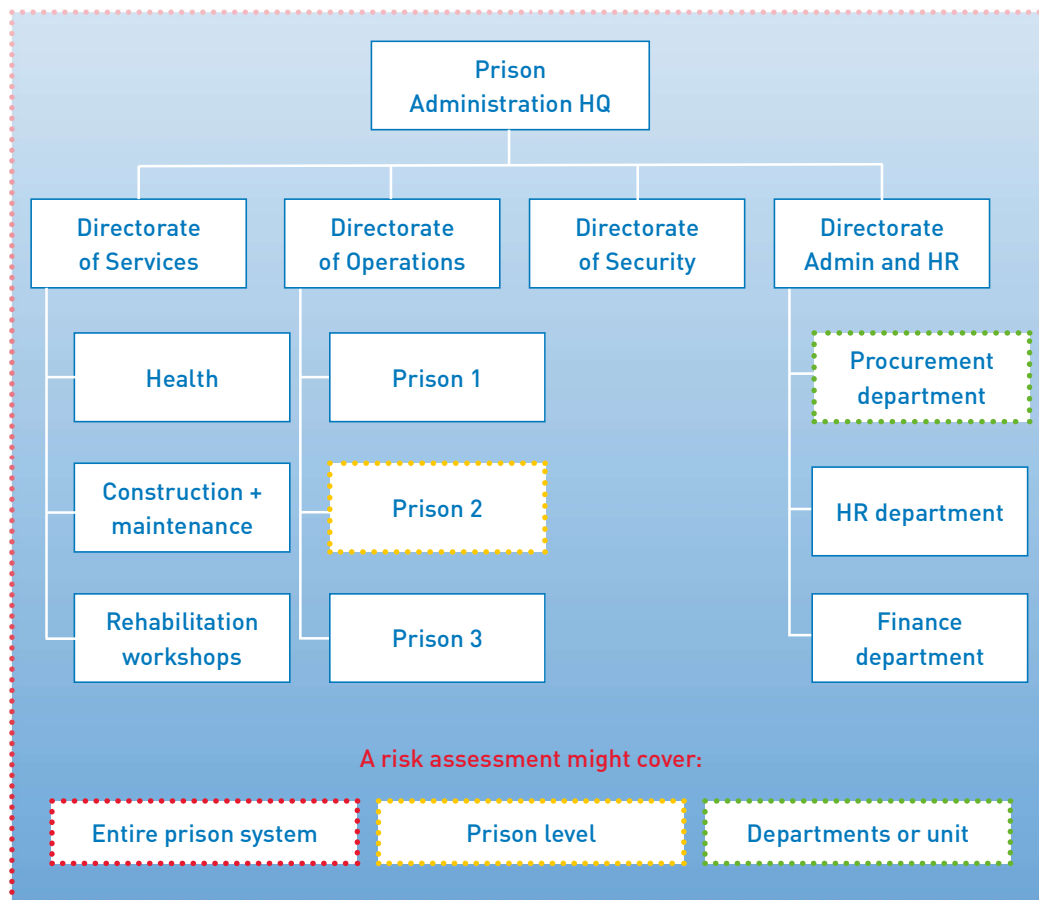
Figure 1. Corruption risk management process



3.2 Preparing for the corruption risk management process

As a first step, it is important to determine the scope that the corruption risk management process will cover. Figure 2 illustrates three potential risk assessment scopes within a hypothetical prison system. As shown, the risk management process could either cover the entire prison system, a specific department or an individual prison. Sometimes, external events might trigger the need for a corruption risk assessment, for example, a corruption scandal within a specific prison or department. Such events may guide decisions related to the scope of the risk assessment process.

Figure 2. Illustration of three potential risk assessment scopes



It is imperative that prison management at the highest levels proactively supports and participates in the corruption risk assessment and provides input into developing the subsequent mitigation strategies. Since prison managers will need to instruct or support the widest possible promulgation of the corruption risk mitigation plan, their leadership in identifying corruption risks, buy-in to identify anti-corruption measures and championing of a zero-tolerance policy against corruption is vital.

Once the scope of the corruption risk management process has been decided, senior management should approve, adequately resource and visibly support the corruption risk management process and the establishment of a respective working group. The resources to be allocated are not only financial but should also encompass experienced staff and sufficient time.

It is recommended that a working group is appointed to lead the process. Its establishment should follow an open and transparent procedure, with membership formally endorsed by the organization's leadership and recorded in writing. The composition of the working group should reflect the main functional areas of the organization such as operations, finance, procurement, human resources and prisoner welfare. It should involve mid- to senior-level managers with decision-making authority and in-depth knowledge of the respective processes under review to ensure that risk analysis is grounded in operational realities and internal control considerations. It is recommended that the working group be reflected in a more balanced and inclusive way to ensure that the concerns of all relevant stakeholders are addressed.

The working group should be chaired by a senior and knowledgeable official with sufficient authority and independence to convene members effectively, ensure meaningful participation and, when required, report directly to the head of the organization. To be able to conduct a rigorous assessment and develop practical and realistic mitigation measures, members must be granted access to information and adequate resources. Ideally, some members should possess prior experience or training in corruption risk assessment. Where internal expertise is limited, the engagement of an experienced external facilitator can help guide the methodology, help structure the discussions and ensure objective and systemic analysis.

The working group should be limited in size to remain operationally efficient, yet broad enough to capture the range of expertise required to identify corruption vulnerabilities. As a rule of thumb, 10–15 members is usually ideal.

Where appropriate and applicable, the national anti-corruption authority may be invited to provide technical input, particularly with regard to applicable legal frameworks, standards and good practices. In certain contexts, the involvement of external stakeholders, such as relevant ministries, oversight bodies or civil society organizations, may enrich the process. Such participation can contribute additional technical or contextual knowledge and enhance transparency. The engagement of external stakeholders should be carefully managed, including with regard to the risk of inadvertent disclosure of sensitive information about prison management processes, safety and security.

The mandate of the working group should be limited to conducting the corruption risk assessment and developing the corresponding mitigation plan. It is not intended to function as a permanent structure. Responsibility for the oversight and monitoring of the implementation of agreed corruption risk management measures should rest with a dedicated and formally established body – such as a corruption prevention committee or equivalent mechanism – in line with the governance framework of the prison administration, facility or department.⁵³

3.3 Corruption risk management process

3.3.1 Step 1 – Assess the organization's operating conditions

Once the necessary preparations have been made, the first step in the risk assessment process is for the working group to establish the operating context in which the prison system or the assessed prison facility operates. This includes consideration of the internal and external factors that might affect the corruption risk management process.

For the *internal* analysis, the following questions should be addressed:

- What laws and regulations govern the prison system's operations, and what powers or mandates do these laws confer?
- What are the existing controls and data systems (CCTV, visit/phone logs, medical/pharmacy inventory, etc.) in the prison system or the assessed prison facility?

⁵³For additional guidance on the proposed composition of the working group, please refer to the UNODC publication on *State of Integrity: A Guide on Conducting Corruption Risk Assessments in Public Organizations*.

- What is the governance framework that guides the prison system's or the assessed prison facility's operations and decision-making processes?
- What is the prison system or the assessed prison facility's structure and how are roles and responsibilities distributed across departments and individuals?
- How are key processes (such as procurement, human resources and financial management) managed within the prison system or the assessed prison facility?
- What is the nature, scale and complexity of the prison system or the assessed prison facility's activities and operations (e.g., budget size, geographical reach, number of staff, service delivery mandates)?
- In which location(s) does the prison system or the assessed prison facility operate?
- Does the prison system or the assessed prison facility have mechanisms in place for reporting, investigating and addressing cases of corruption or misconduct? If so, how do they function in practice?
- What are the known cases of corruption that have occurred in the prison system or the assessed prison facility in the past? Have mitigation measures been implemented as a result?

For the *external* analysis, some guiding questions include:

- What government bodies oversee the prison system (parliament, supreme audit institution, the courts, etc.) and how do they respond to corruption reports?
- What kind of external and independent bodies, such as prison inspectorates, ombuds institutions or national human rights commissions have the mandate to inspect prisons or review corruption complaints? Is there a National Preventive Mechanism with a mandate to carry out unannounced visits?
- What role do prosecution services, the judiciary and courts play in overseeing the legality and conditions of detention, the enforcement of sentences and release procedures?
- How do audit or other relevant bodies scrutinize prison budgets, procurement processes and staffing?
- Which external stakeholders, such as civil society organizations, professional associations or service providers, engage with the prison system and in what capacity?
- Are there any external reports that have identified corruption as an issue?

When assessing the external context, the working group should examine oversight and transparency mechanisms, as prisons are inherently closed environments. These include internal audits and independent inspections conducted by independent bodies. Such bodies play a vital preventive role through regular visits, handling of complaints and publication of findings. Weak or absent oversight should be recorded as a significant corruption risk factor. The working group should also consider external influences on corruption risks, the organization's degree of control over them and its relationships with other public or private actors in the prison system. Civil society organizations and other external actors that are involved in service delivery in prisons can provide valuable insights.

This step is not intended to be a time-consuming exercise; rather, the working group should aim to produce a concise, high-level analysis of the organization's operating context before moving to Step 2 of the process.

3.3.2 Step 2 – Identify the risk of corruption

The second step of the process is for the working group to develop a list of corruption risks. This exercise is forward-looking as opposed to serving as an investigation into past corruption. Section 2.3 of this Guide provides some common examples of corruption risks related to prison systems which could be considered during the corruption risk identification stage.

A brainstorming session is an effective method to generate a broad list of potential corruption risks. At this stage in the process, it is better to include risks than to leave them out as the opportunity to exclude risks will come at the analysis and evaluation stages. The focus should remain on internal risks that fall under the sphere of influence of the prison system and its managers. For example, legislative issues or issues related to low remuneration are often beyond the control of the prison system; these can be noted although the laws and salary scales directly cannot be amended or changed. These can also be used to make recommendations.

In addition to a brainstorming session, wherever feasible, the working group should adopt an evidence-based approach to risk identification. This model is based on the collection and analysis of data to inform decision-making. This may involve assessing multiple sources of empirical information to ground the identification of risks. Additionally, it may also include periodic review and triangulation of routine administrative data, monitoring information, inspection findings and statistical trends.

Both the brainstorming and the evidence-based approaches should be complemented by conducting interviews with key personnel, such as accountants, procurement officers, internal auditors or procurement managers and front-line practitioners from different disciplines who can offer valuable insights and help confirm initial findings. A review of internal documentation such as prisoner complaints, disciplinary records, incident reports, procurement files, audit reports and outcomes of internal investigations can reveal patterns or gaps indicating corruption risks.

External sources of information further enrich the analysis. These should include reports from prison inspectorates, ombudsman institutions or national human rights commissions; audits by supreme audit institutions or ministries of finance; investigations by anti-corruption bodies or law enforcement agencies; as well as reports from parliamentary oversight committees, civil society organizations or service providers working in prisons.

Table 2 provides an example of possible risks grouped according to specific functions.

Table 2. Example of a risk identification session by the working group

PRISON FUNCTION	CORRUPTION RISK
Custodial operations	Prison staff solicit or accept bribes from prisoners or their families for protection from torture or ill-treatment
	Prison staff solicit or accept bribes or other benefits from prisoners or prisoners' family members for access to basic rights or services (e.g., food, water, time out of cell, phone calls, medical services, visits or better accommodation)
	Prison staff demand or accept sexual favours from prisoners in exchange for preferential treatment or access to goods and services
Prison management	Prison staff solicit or accept bribes from suppliers for awarding contracts or ensuring favourable terms
	Prison staff solicit or accept bribes or benefits from contractors to overlook substandard goods or services (food, medicines, building materials, etc.)
	Prison staff embezzle prison property (e.g., materials, vehicles, equipment or tools)
	Recruitment, appraisal or promotion decisions are influenced by bribery, nepotism or personal connections
Rehabilitation and social reintegration	Prison staff solicit or accept bribes from prisoners or their families for assignment to or exemption from work placements or access to education or vocational training
	Prison staff embezzle funds or manipulate financial transactions linked to prisoner work programmes and prisoner earnings
Safety and external processes	Prison staff smuggle prohibited items (e.g., mobile phones, drugs, alcohol, tobacco, money, weapons) into the prison in exchange for bribes or other benefits from prisoners or external actors
	Prison staff solicit or accept bribes from prisoners or their families for early release, parole or other forms of sentence reduction

3.3.3 Step 3 – Conduct a corruption impact analysis

Once the working group has listed potential corruption risks, an analysis should be undertaken to understand the nature, characteristics and potential impact that these risks would have if they were to materialize (e.g., see table 3). During this stage, suspicious patterns are likely to become apparent, such as unusually high expenditure in one prison compared to others, a large quantity of drugs found in a single accommodation block or one supplier winning a disproportionate number of contracts.

Corruption risks in the prison system can be classified into three overarching types of impact, noting that a single corruption risk might fall into multiple categories:

- **Financial.** Risks that involve potential loss of revenue or misuse of funds
- **Reputational.** Risks that damage the organization's credibility and public trust
- **Mandate-related.** Risks that hinder the organization's ability to effectively carry out its core mission—most notably, ensuring safe, secure and humane custody

Table 3. Example of a corruption risk identification session by the working group

ORGANIZATIONAL FUNCTION	CORRUPTION RISK	IMPACT
Custodial operations	Prison staff solicit or accept bribes from prisoners or their families for protection from torture or ill-treatment	• Mandate: Undermines the prison's obligation to ensure humane treatment and safeguard human rights. Violates international minimum prison standards (e.g., the Mandela Rules) • Reputation: Damages national and international credibility, provokes criticism from civil society and the general public; erodes trust in the criminal justice system
	Prison staff solicit or accept bribes or other benefits from prisoners or prisoners' family members for access to basic rights or services (e.g., food, water, time out of cell, phone calls, medical services, visits or better accommodation)	• Mandate: Obstructs the organization's core duty of care and respect for human dignity and prisoners' rights • Reputation: Creates perceptions of systemic corruption and abuse; erodes public trust in the criminal justice system and results in (inter)national condemnation
	Prison staff demand or accept sexual favours from prisoners in exchange for preferential treatment or access to goods and services	• Mandate: Violates core human rights obligations and undermines the prison's role to ensure safe, secure and humane custody and to advance rehabilitation • Reputation: Causes severe reputational damage at (inter)national level; erodes public trust in the criminal justice system
Prison management	Prison staff solicit or accept bribes from suppliers for awarding contracts or ensuring favourable terms	• Financial: Inflates contract prices or causes overpayment for goods/ services, resulting in overspending and loss of public funds • Mandate: Reduces efficiency and quality of prison operations by diverting scarce resources from essential needs • Reputation: Damages integrity and credibility of procurement processes; fosters perception of systemic corruption among suppliers as well as oversight bodies and the generic public

Prison management <i>(cont.)</i>	Prison staff solicit or accept bribes or benefits from contractors to overlook substandard goods or services (food, medicines, building materials, etc.)	• Mandate: Endangers prison health, safety, security and rehabilitation efforts; undermines compliance with minimum prison standards and human rights obligations • Reputation: Causes scandals involving poor food or medical services; erodes public confidence in prison management and the criminal justice system
	Prison staff embezzle prison property (e.g. materials, vehicles, equipment or tools)	• Financial: Causes direct financial loss amid scarce resources • Mandate: Limits prison capacity to operate effectively (e.g., lack of equipment, poor maintenance) • Reputation: Creates public perception of mismanagement and weak controls; undermines trust in the prison administration and the criminal justice system
	Recruitment, appraisal or promotion decisions are influenced by bribery, nepotism or personal connections	• Financial: Creates costs caused by unqualified or unsuitable staff (inefficiency, misconduct, errors, triggering a need for retraining or replacement) • Mandate: Undermines professionalism, weakens institutional performance and compromises prison security and rehabilitation goals • Reputation: Creates perceptions of unfair practices and reduces morale among prison staff; damages the prison system's credibility with oversight institutions and the public
Rehabilitation and social reintegration	Prison staff solicit or accept bribes from prisoners or their families for assignment to or exemption from work placements or access to education or vocational training	• Financial: Creates inefficiencies if resources for rehabilitation are misallocated; potential donor withdrawal if programmes are perceived as corrupt • Mandate: Undermines rehabilitation goals, reduces reintegration prospects and increases recidivism risks; violates principles of fairness and equal access

Rehabilitation and social reintegration (cont.)	Prison staff embezzle funds or manipulate financial transactions linked to prisoner work programmes and prisoner earnings	• Financial: Causes loss of income generated by work programmes; reduces funding available for rehabilitation activities and other prison management functions • Mandate: Undermines prisoner rehabilitation and reintegration opportunities, reducing programme effectiveness • Reputation: Fosters perception of exploitative prison work schemes; damages credibility of prison rehabilitation programmes; risks leading to donor or external partner withdrawal
Safety and external processes	Prison staff smuggle prohibited items (e.g., mobile phones, drugs, alcohol, tobacco, money, weapons) into the prison in exchange for bribes or other benefits from prisoners or external actors	• Financial: Fuels underground prison economies, increasing security costs and potential damage from riots, violence and other security incidents • Mandate: Compromises the prison's role to ensure safe, secure custody and maintain order; undermines the rule of law by allowing criminal networks to continue operating from within prison walls
	Prison staff solicit or accept bribes from prisoners or their families for early release, parole or other forms of sentence reduction	• Mandate: Directly undermines the justice system by compromising sentencing integrity and public safety • Reputation: Damages the credibility of correctional service and the judiciary; risks eroding public confidence in the integrity of the criminal justice system; provokes political and/or media backlash

3.3.4 Step 4 – Prioritize corruption risks

It may not be feasible for a prison to address all identified corruption risks, nor would it be practical to do so. During this step of the process, the working group should evaluate which corruption risks to prioritize in the corruption risk mitigation plan.

The prioritization of corruption risks is particularly essential when many risks have been identified or when resources are scarce. To help decide which risks to prioritize, the working group should identify where corruption is most likely to occur (*likelihood*) and if corruption was to occur, where the impact would be most severe (*impact*). As demonstrated in figure 3, a priority rating should be assigned for each risk. This approach ensures that resources focus on mitigating corruption risks that are most significant and likely. This is without prejudice to the continued relevance of low and, in particular, medium priority corruption risks, which should still be monitored and addressed at a later stage.

Corruption risks should be rated against clearly defined scales for both likelihood and impact. These may be expressed qualitatively (“low”, “medium”, and “high”) or numerically (1=low, 2=medium, 3=high). To promote consistency and reduce subjectivity, the working group should agree in advance on explicit criteria for each category. For example:

- **Likelihood**

- *Low (1)*: Rare occurrence; strong existing controls; no recent incidents
- *Medium (2)*: Occasional occurrence; some control weaknesses; isolated past incidents
- *High (3)*: Frequent occurrence; significant control deficiencies; recurring incidents or credible warning signs

- **Impact**

- *Low (1)*: Limited operational disruption; minor financial loss; negligible reputational damage
- *Medium (2)*: Noticeable financial, operational or reputational consequences; possible disciplinary or administrative repercussions
- *High (3)*: Severe operational disruption; substantial financial loss; significant reputational damage; potential legal consequences or systemic harm to prisoner welfare

Once ratings are assigned, risks can be included on a three-by-three risk matrix (see figure 3), where the vertical axis represents likelihood and the horizontal axis represents impact. The overall priority score is calculated through a simple multiplication of the two ratings, resulting in a score ranging from 1 to 9.

The resulting classification may be structured as follows:

- *Major risks (High priority)*: Scores 6–9. These typically include risks where both likelihood and impact are high ($3 \times 3 = 9$) or where one dimension is high and the other medium ($3 \times 2 = 6$). These risks fall in the upper-right quadrant of the matrix and require immediate mitigation measures and allocation of resources.
- *Moderate risks (Medium priority)*: Scores 3–4. These risks fall in the central cells of the matrix (e.g., $2 \times 2 = 4$ or $3 \times 1 = 3$) and should be managed through proportionate mitigation measures or enhanced monitoring.
- *Minor risks (Low priority)*: Scores 1–2. These typically arise where both likelihood and impact are low ($1 \times 1 = 1$) or where one dimension is low and the other medium ($1 \times 2 = 2$). These risks fall in the lower-left quadrant and may be monitored periodically, with corrective action taken if conditions change.

The matrix approach provides a transparent, structured and reproducible method for ranking risks. It enables the prison system to concentrate resources on corruption risks that are both probable and consequential, while ensuring that lower-rated risks remain under observation and can be reassessed as part of regular review cycles.

Figure 3. Example of a corruption risk prioritization matrix

LIKELIHOOD	High	Embezzlement of prison property	Bribes to staff to smuggle in drugs	Nepotism in promotions
	Medium			Sexual corruption
	Low	Embezzlement related to work programmes		Bribes to staff to smuggle in guns
		Low	Medium	High
IMPACT SEVERITY				

It should be noted that these ratings, although subjective, are not guesswork. The impact and likelihood severity ratings given by the working group should be justifiable based on the evidence gathered in the risk analysis stage of the corruption risk assessment process and the working group's knowledge of the prison system.

Table 4 shows how each corruption risk can be evaluated,⁵⁴ with an overall rating, which can be plotted on a risk matrix.

Table 4. Example of corruption risk analysis and evaluation for a prison

PRISON FUNCTION	CORRUPTION RISK	IMPACT SEVERITY	LIKELIHOOD	OVERALL RATING
Custodial operations	Prison staff solicit or accept bribes from prisoners or their families for protection from torture or ill-treatment	High	Low	Medium
	Prison staff solicit or accept bribes or other benefits from prisoners or prisoners' family members for access to basic rights or services (e.g., food, water, time out of cell, phone calls, medical services, visits or better accommodation)	Medium	Medium	Medium
	Prison staff demand or accept sexual favours from prisoners in exchange for preferential treatment or access to goods and services	High	Medium	High

⁵⁴The table is drawn from the *State of Integrity* and contextualized for prison settings.

Prison management	Prison staff solicit or accept bribes from suppliers for awarding contracts or ensuring favourable terms	Medium	Low	Low
	Prison staff solicit or accept bribes or benefits from contractors to overlook substandard goods or services (food, medicines, building materials, etc.)	High	Low	Medium
	Prison staff embezzle prison property (e.g. materials, vehicles, equipment or tools)	Low	Medium	Low
	Recruitment, appraisal or promotion decisions are influenced by bribery, nepotism or personal connections	High	High	High
Rehabilitation and social reintegration	Prison staff solicit or accept bribes from prisoners or their families for assignment to or exemption from work placements or access to education or vocational training	Low	Medium	Low
	Prison staff embezzle funds or manipulate financial transactions linked to prisoner work programmes and prisoner earnings	Medium	Low	Low
Safety and external processes	Prison staff smuggle prohibited items (e.g., mobile phones, drugs, alcohol, tobacco, money, weapons) into the prison in exchange for bribes or other benefits from prisoners or external actors	Medium	High	High
	Prison staff solicit or accept bribes from prisoners or their families for early release, parole or other forms of sentence reduction	High	Low	Medium

3.3.5 Step 5 – Mitigate corruption risks

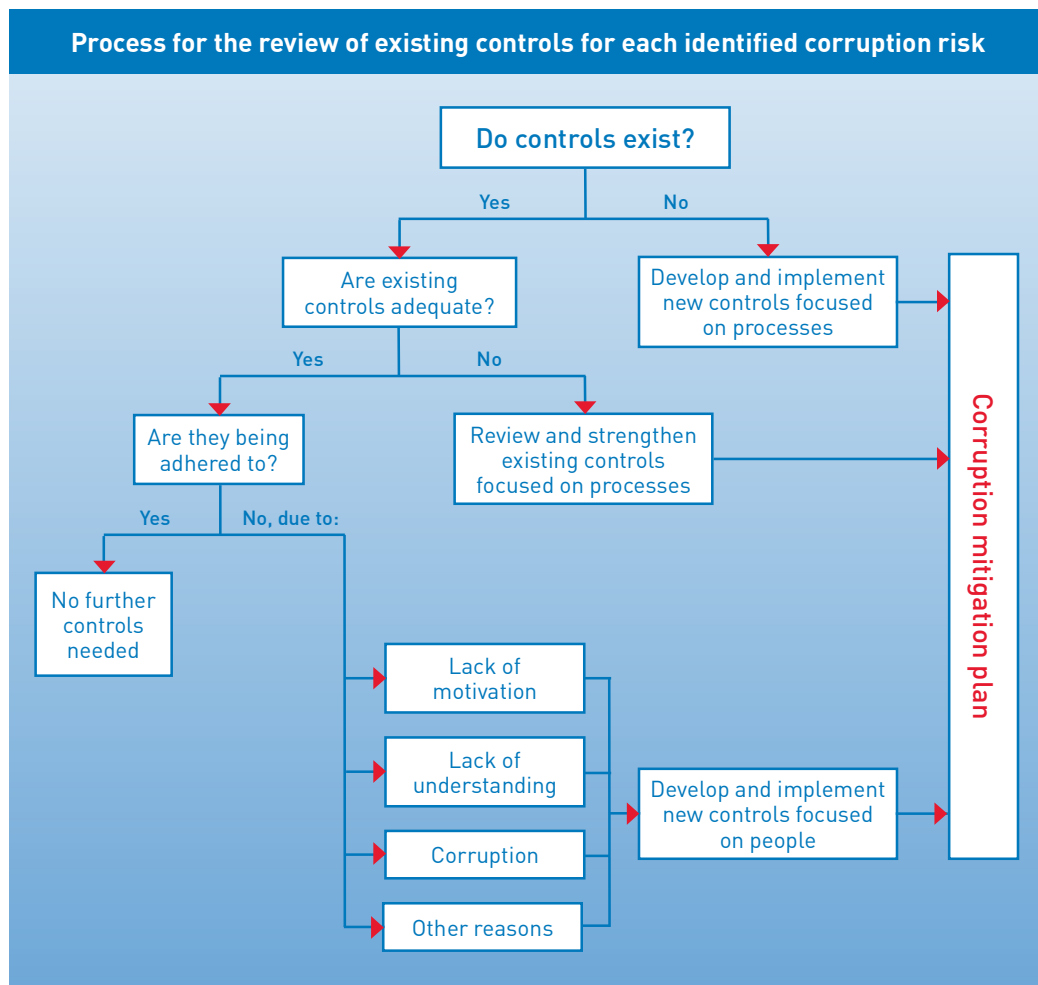
The next stage aims at addressing the prioritized corruption risks by creating and implementing tailored corruption risk mitigation strategies. These strategies, when put together, will form the prison system's corruption risk mitigation plan.

The working group first analyses the underlying causes of each identified corruption risk, recognizing that different causes require different responses. For example, a corruption risk caused by lack of oversight demands a different approach than one caused by inadequate staff training

or the absence of an automated system. This is important since experience from anti-corruption interventions shows that incorrect diagnosis led to inadequate responses.⁵⁵

Second, the working group defines the controls (laws, policies, procedures, processes, management systems, etc.) that the prison system aims to strengthen or put in place to mitigate the prioritized corruption risks. Controls aim to detect and then deter improper actions. To determine the adequacy of controls or to identify areas in which controls are lacking, the working group should follow the flow chart in figure 4 in an iterative fashion for each identified cause.

Figure 4. Process for the review of existing controls for each identified corruption risk



If the working group has found that a control for a specific corruption risk does not exist or is inadequate, the group will need to develop and implement the required controls or strengthen existing ones.⁵⁶ A useful way to organize the thoughts of the working group is through a table listing each risk, the causes, the control or controls currently in place to mitigate it, a description of what risk remains and the additional controls needed to mitigate the remaining risk (see table 5). In instances where no controls are in place and new procedures are enacted, the working group should communicate them to the prison staff in a timely and thorough manner.

⁵⁵Barrington, R., Silverman, J., & Hutton, M. (2021). Corruption in UK prisons: A critical evaluation of the evidence base. *Prison Service Journal*, 252, 46–57.

⁵⁶Chowdhry, A., Nagesh, A., Luna, T., Tsai, E., & McKenna, N. (2024 Mar. 1). *Betrayal behind the bars: Curbing corruption in prisons*. Institute for Youth in Policy.

Table 5. Examples of assessing controls related to identified corruption risks

CORRUPTION RISK	PRIORITY	CAUSE(S)	EXISTING CONTROLS	REMAINING RISK	STRENGTHEN OR DEVELOP CONTROLS
Prison staff smuggle prohibited items (e.g., mobile phones, drugs, alcohol, tobacco, money, weapons) into the prison in exchange for bribes or other benefits from prisoners or external actors	High	Prisoners are willing to pay large sums of money for contraband Lack of systematic searching of staff upon entry to prison Inadequate prison intelligence and monitoring	Prison rules prohibiting prisoners from possessing money or contraband Occasional checks of staff and visitors	Staff perceive a low risk of being caught Searching and monitoring are inconsistent and infrequent The intelligence system is underdeveloped	Introduce random and systematic searching of all staff entering prisons Introduce transparent bags as part of the staff uniform Strengthen the prison intelligence system to identify and disrupt smuggling networks
Recruitment, appraisal or promotion decisions are influenced by bribery, nepotism or personal connections	High	Paper-based promotion system reliant on management discretion Limited transparency in promotion processes Weak oversight and little supervision by senior managers	Promotion system with management reviews Basic documentation requirements	Process lacks transparency and accountability Documentation is incomplete or inconsistent Senior management oversight is limited Staff perceive unfairness, which undermines morale	Improve documentation and record-keeping of promotion decisions Include representatives from other prisons or regions on promotion boards to reduce bias Publish promotion criteria and results to enhance transparency Establish external or independent review of promotion outcomes
Prison staff demand or accept sexual favours from prisoners in exchange for preferential treatment or access to goods and services	High	Lack of clear policies on staff-prisoner boundaries Inadequate supervision and monitoring Understaffing and poor staff-prisoners ratio Lack of ethics Lack of external oversight	Staff code of conduct and ethics SOP (standard operating procedure) on monitoring and supervision	Staff not aware of code of ethics or ignore it Lack of staff to effectively enforce monitoring and supervision	Refresher training on code of ethics Confidential reporting system for prisoners Training on how to prevent conditioning and manipulation by prisoners Review SOP on monitoring and supervision Establish a platform for external oversight

Before finalizing the plan, the working group should seek feedback from prison staff and other relevant stakeholders and obtain the approval of senior management. The plan should clearly outline the strategies and actions that the prison system will implement to mitigate the priority risks and address their underlying causes and the expected timelines and scope of each strategy, as illustrated in table 6. The working group should include mandatory reporting and oversight mechanisms into the mitigation plan timeline to ensure that the plan is implemented efficiently and in a timely manner.

Table 6. Example of the structure of a corruption risk-mitigation plan

CORRUPTION RISK	CAUSE(S)	RISK MITIGATION STRATEGY	VERIFIABLE INDICATOR	RESPONSIBLE	RESOURCES	TIMELINE dd/mm/yy
Prison staff smuggle prohibited items (mobile phones, drugs, alcohol, tobacco, money or weapons) into the prison in exchange for bribes or other benefits from prisoners or external actors	Prisoners pay large sums of money Lack of systemic searching of staff on entry to the prison Inadequate prison intelligence and monitoring	Introduce random and systemic searching of all staff entering the prison Strengthen prison intelligence system to identify and disrupt trafficking networks Maintain searching logbook at entry point to monitor compliance Train staff on corruption risks and disciplinary consequences	Number of entries in searching logbook (compliance evidence) Number of security intelligence reports received related to trafficking	Head of security	Staff time to do the searching	Immediate
Recruitment, appraisal or promotion decisions are influenced by bribery, nepotism or personal connections	Nepotism and favouritism in decision-making Paper-based system reliant on management discretion Lack of transparency in promotion processes Limited supervision and oversight by senior managers	Develop and implement a clear, standardized documentation system for promotion decisions, ensuring criteria and justifications are recorded Establish promotion boards that include independent representatives from other prisons, regions or external oversight bodies to reduce bias Publish promotion criteria in advance and share results promptly	Standardized promotion documentation is in place Percentage of promotion boards that include an independent person from outside the prison Promotion results published Number of staff grievances or complaints related to promotions decreases over time	Head of human resources	Time to design new forms Time required of independent board member	Date

CORRUPTION RISK	CAUSE(S)	RISK MITIGATION STRATEGY	VERIFIABLE INDICATOR	RESPONSIBLE	RESOURCES	TIMELINE dd/mm/yy
Prison staff demand or accept sexual favours from prisoners in exchange for preferential treatment or access to goods and services	Staff abusing their position to coerce prisoners Conditioning manipulation of staff by prisoners Lack of awareness or disregard for staff-prisoner boundary policies Inadequate supervision in monitoring staff	Deliver regular refresher training on the staff code of ethics and professional boundaries Provide targeted training on recognizing and preventing conditioning and manipulation by prisoners Establish a confidential reporting system for prisoners to safely report staff misconduct	Logbook showing number of staff completed refresher training on code of ethics and on preventing conditioning and manipulation Confidential reporting for prisoners introduced Percentage of staff who have completed targeted training on recognizing and preventing prisoner conditioning and manipulation	Head of staff training Head of security	Staff time to deliver training Staff time to participate in training Time to design and implement new confidential reporting system	01/09/xxxx

Incorporating the corruption risk mitigation plan into the organization's operational and strategic workplans, under the supervision of key prison staff who are responsible for its success, will ensure that the prison system commits sufficient time, staff and funds to implement the plan.

The specific verifiable indicators should be monitored regularly to enable the prison system to evaluate whether each risk mitigation strategy has been successfully implemented and, if not, to adjust the mitigation plan accordingly. This process should be institutionalized within a designated structure, such as a Corruption Prevention Committee (CPC), Integrity Committee, Ethics Unit or Internal Audit. This does not need to be a new structure if an existing unit already performs similar functions or oversees related responsibilities.

Over time, these institutional arrangements can support more agile and sustainable corruption risk management and embed a culture of prevention across the organization, with the goal of achieving sound and rights-compliant prison management as outlined in the Nelson Mandela Rules as well as transparency and accountability in the management of public finances, as promoted by UNCAC.⁵⁷

⁵⁷United Nations (2003). *United Nations Convention against Corruption (UNCAC)*, art. 9, para. 2(d), p. 13. Annex B provides a summary table of the corruption risk management process.