

Chapter 4

Corruption risk mitigation strategies

Corruption risk mitigation strategies that can be tailored to the prison system undergoing the corruption risk management process are outlined in the next three sections. The listed strategies are not exhaustive but instead aim to provide examples that have proven effective in certain prison contexts. The strategies can be divided into three groups: *Process-based* that foster a preventive approach aimed at implementing or strengthening controls; *People-based* that foster a preventive approach but focus on the people carrying out the process; *Enforcement-based* strategies that aim to prevent corruption through deterrence while also addressing the corrupt act after it has occurred. The risk mitigation strategies outlined build on a growing body of academic research on identifying and preventing corruption in prisons.⁵⁸

4.1 Process-based corruption risk mitigation strategies

Process-based corruption risk mitigation strategies adopt a preventive approach by strengthening controls. This chapter presents examples of process-based strategies and case studies from Member States who have successfully implemented such strategies.

⁵⁸Pyman, M. (2021) *Curbing corruption in prison services: Sector reform experience and strategies*. [Online self-publication]; Peterson, B., Kizzort, M., Kim, K., & Shukla, R. (2021). Prison contraband: Prevalence, impacts, and interdiction strategies. *Corrections*, 8(5), 428–445; Barrington, R., Silverman, J., & Hutton, M. (2021). Corruption in UK prisons: A critical evaluation of the evidence base. *Prison Service Journal*, 252, 46–57. [Sussex Research Online]; Center for the Advancement of Public Integrity (2016). *Prison corruption: The Problem and some potential solutions*. Columbia Law School; Sauve, B., Woodley, J., Jone, N. J., & Akhtari, S. (2023). *Methods of preventing corruption: A review and analysis of select approaches*. Public Safety Canada, Research Division (Research Report 2023-R010); Brown, G., & Hoffman, R. (2018 Nov.). *Anti-corruption models and elimination of staff involvement in trafficking contraband in correctional settings: Review of the current literature*. Correctional Service of Canada (Research Report R-415); Goldsmith, A., Halsey, M., & Groves, A. (2016). *Tackling correctional corruption*. Springer; Goldsmith, A., Halsey, M., & de Vel-Palumbo, M. (2018). *Literature review: Correctional corruption*. Flinders University.

4.1.1 The practical application of the Nelson Mandela Rules

Advancing the practical application of the Nelson Mandela Rules is key to prevent corruption by embedding transparency, accountability and fairness in daily prison management and the treatment of prisoners.

Rule 83

1. There shall be a twofold system for regular inspections of prisons and penal services:

(a) Internal or administrative inspections conducted by the central prison administration;

(b) External inspections conducted by a body independent of the prison administration, which may include competent international or regional bodies.

2. In both cases, the objective of the inspections shall be to ensure that prisons are managed in accordance with existing laws, regulations, policies and procedures, with a view to bringing about the objectives of penal and corrections services, and that the rights of prisoners are protected

Next to the above, key safeguards include informing prisoners of rules governing prison life, the authorized methods for seeking information, access to legal aid, independent external investigations into serious prison incidents as well as procedures for requests or complaints, especially when reporting staff misconduct. These mechanisms should be accessible and ideally form part of a corruption risk mitigation strategy. Comprehensive guidance on the full range of good prison management practices and the broader application of the Nelson Mandela Rules is available in the UNODC Criminal Justice Handbook Series on Prison and Penal Reform, including in the form of a dedicated checklist to assess compliance with the Nelson Mandela Rules.⁵⁹

Member States should pay similar attention to the Bangkok Rules⁶⁰ with a view to addressing gender-specific corruption risks, including safe reporting and independent investigations of sexual exploitation and harassment; unhindered access to women's health services and menstrual hygiene; the prohibition of payments or favours for services; bans on restraints during labour and post-partum; same-sex trained staff for sensitive duties; and equal access to visits, communication, work and programmes without favouritism.

4.1.2 Increasing transparency and accountability

Transparency and accountability in prison systems can be strengthened through a combination of legal, procedural and operational measures that help ensure that decision-making and management processes are visible, traceable and subject to scrutiny.

As far as procurement is concerned, for example, open contracting makes all of its stages transparent and accessible to the public. Publishing data on tenders, bids and awarded

⁵⁹UNODC (2017). *Assessing Compliance with the Nelson Mandela Rules: A checklist for internal inspection mechanisms*.

⁶⁰United Nations (2011). *United Nations Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders (Bangkok Rules)*, (A/RES/65/229).

contracts can reduce corruption, prevent misuse of public funds and ensure fair competition among suppliers. It also allows civil society, journalists and oversight bodies to scrutinize spending and performance, thereby strengthening accountability and improving the quality and cost-effectiveness of prison services. Further detailed guidance on the subject of preventing corruption in procurement can be found in the guiding documents published by UNODC and other entities.⁶¹

The increased use of technology also plays an important role in enhancing transparency and efficiency. Tools such as electronic prisoner file management systems, other secure data storage systems, e-procurement platforms and digital payroll systems can reduce opportunities for manipulation and improve the reliability and accessibility of information. However, technology is most effective when implemented alongside broader governance and accountability measures. Further detailed guidance on this subject can be found in the UNODC *Handbook on the Use of Technology in Prison Settings*.⁶²

Even low-cost measures can have a significant impact. For example, publishing basic statistics on prison populations or staffing or clearly communicating on entitlements and complaint mechanisms, can reduce opportunities for corruption.

At the operational level, prison policies and procedures should be transparent, clear, simple and designed to minimize unnecessary steps in accessing services. Overly complex or unclear processes can create frustration among prisoners and opportunities for staff to solicit bribes to expedite services or processes.



HONG KONG, CHINA: COMPREHENSIVE ANTI-CORRUPTION APPROACH IN PRISON MANAGEMENT

In the early 1970s, corruption was deeply entrenched across every level of society in Hong Kong. Responding to public demand for decisive action on anti-corruption reforms, the Government established the Independent Commission Against Corruption (ICAC) in 1974 as an independent anti-corruption agency. In the Correctional Services Department (CSD), a new institution, the so-called Security Section, was formed to rebuild order and trust in prisons.

Building on a shared mission, ICAC collaborates with CSD as an independent partner in anti-corruption. Both parties contribute their distinct strengths (CSD's deep insight into prison dynamics and ICAC's specialized expertise in anti-corruption), working in tandem to tackle prison corruption under a three-pronged approach:

⁶¹The guidebooks include UNODC 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 Non-binding Guidelines on the Adoption and Use of Technologies to Combat Corruption in Public Procurement; UNODC *Guide to Enactment of the UNCITRAL Model Law on Public Procurement*; as well as G20 principles for promoting integrity in public procurement.

⁶²UNODC (2026). *Handbook on the Use of Technology in Prison Settings*. Criminal Justice Handbook Series.

- **Law enforcement.** A dedicated investigation team from ICAC collaborates closely with CSD, sharing intelligence and coordinating swift actions on corruption cases. Regular management-level meetings ensure that corruption cases are adequately reviewed and intelligence is regularly exchanged, while a direct referral channel makes sure that every corruption case is duly handled.
- **Systemic prevention.** ICAC conducts in-depth procedural reviews of prison operations, identifying vulnerabilities and strengthening internal controls to leave no room for corruption. In-depth reviews have addressed diverse and critical areas in prison operations – from security control and prisoner rehabilitation to staff management and daily administrative matters.
- **Integrity education.** To foster integrity across the entire prison workforce, ICAC actively participates in the CSD's dedicated ethics committee, which is led by a CSD Directorate officer to oversee a wide range of integrity initiatives across all prison operations. ICAC also provides targeted training for prison staff, ranging from induction courses for new recruits to periodic refresher sessions for serving officers.

Anti-corruption measures in Hong Kong, China place transparency and checks and balances at the core of prison management. Clear notices in visiting areas inform the public that prison staff are strictly prohibited from soliciting money, gifts or favours. Prominently displayed reporting channels, including direct phone lines to responsible prison staff and ICAC, offer easy and transparent access for reporting misconduct. Upon admission, prisoners receive an information booklet (available in 27 languages), detailing their rights and entitlements, highlighting secure and confidential complaint channels available (including access to the Hong Kong Justices of the Peace and Ombudsman or ICAC Commissioner) and reiterating that all basic needs (including food, medical care, visitation and rehabilitation) are provided free of charge.

The prison system in Hong Kong, China actively leverages technology to address evolving corruption risks, enhance transparency and minimize misconduct. Unit management with video analytics enables real-time monitoring by automatically alerting staff to irregularities such as fights or unauthorized gatherings and facilitates safe and centralized supervision of multiple areas from one duty room, reducing exposure of a single officer from improper influence. Smart Prison initiatives automate security controls, daily operations, prisoner routines and staff development, creating a more open and accountable environment.

Source: Websites of ICAC and CSD, Hong Kong, China.

As outlined above, prison oversight mechanisms – both internal and external – are essential to ensure transparency and accountability in prison management. Internal mechanisms (e.g., audits, inspections) provide continuous monitoring and help identify irregularities at an early stage. External oversight bodies (e.g., Prison Inspectorates, National Preventive Mechanisms, National Human Rights Institutions) bring independent scrutiny, can investigate complaints and contribute to broader preventive mandate. The publication of investigation, inspection and monitoring visit reports further strengthens access to information and reinforces accountability.

In addition to formal oversight structures, civil society organizations and faith-based groups play a valuable, complementary role. Where they are present in prisons to deliver services, they are often well placed to observe day-to-day operations, identify emerging risks and contribute to greater transparency through their engagement with both staff and prisoners.



NORTH MACEDONIA: ANNUAL CORRUPTION RISK ASSESSMENTS AND PUBLIC REPORTING

Since 2022, the Directorate for Execution of Sanctions has institutionalized a system of annual corruption risk assessments, requiring every prison and the Directorate itself to prepare Annual Corruption Risk Assessment Plans. These plans build on the Directorate's sector-wide corruption risk analysis and set out identified risks and mitigation measures for each year. To strengthen transparency and accountability, the Directorate also publishes quarterly public reports tracking implementation progress. These reports provide regular updates on compliance, vulnerabilities and follow-up actions across all penitentiary institutions. This combination of annual risk planning and quarterly public reporting has created a continuous oversight cycle and increased visibility of integrity efforts within the prison system.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025)

CHILE: USING COMPLAINT DATA TO MAP ETHICAL RISKS

The prison service in Chile applies a data-driven approach to strengthen transparency and identify integrity risks. As part of its Integrity and Ethics Strengthening Plan, the Chilean Gendarmerie conducted a quantitative analysis of 1,929 citizen complaints received between January 2023 and June 2024. The data were adjusted for the population served in each region, allowing the institution to pinpoint where complaints were concentrated. Based on this analysis, a national ethical risk map was developed to highlight areas where conduct may deviate from institutional standards.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025)..



COSTA RICA: DIGITAL SYSTEMS ENHANCING TRANSPARENCY AND CONTROL

In Costa Rica a central tool to strengthen integrity, improve traceability and reduce discretion in prison administration is the Sistema Integrado de Compras Públicas (SICOP). It is a national e-procurement platform that the Ministry of Justice and Peace must use for all penitentiary purchases. SICOP records every stage of the contracting cycle, tenders, offers, evaluations, adjudications, guarantees and contract modifications, creating a fully digital, chronologically sealed audit trail. This standardizes procurement procedures across all prisons, minimizes informal decision-making and enables continuous oversight by internal audit units, the Comptroller General and citizens. Prison operations rely on digital record-keeping, including standardized electronic logs and information systems that document prisoner movements and administrative decisions. These tools enhance consistency, prevent tampering and facilitate rapid verification during inspections or investigations, reinforcing the broader integrity framework.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

INDONESIA: PRISON INTEGRITY ZONES

Indonesia introduced integrity zones in prisons to reduce corruption and improve service delivery, with 128 prison units certified as corruption-free (WBK) or service-oriented (WBBM). Various digital tools and procedural innovations have emerged to address corruption and inefficiencies. Certification as an Integrity Zone is based not on an evaluation of corruption levels in a prison, but on bureaucratic measures it has taken to reduce the likelihood of corruption, such as the provision of clear and transparent guidelines and the digitalization of processes.

Source: Schütte, S., Wening, P.P.P., & Maulana, I. (2025). Integrity Zones in Indonesian prisons: Addressing corruption amid overcrowding. U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute (U4 Brief 2025:2).

4.1.3 Anti-corruption units and focal points

UNCAC requires States parties to establish bodies to prevent and counter corruption. Prison administrations should consider establishing a dedicated anti-corruption committee, unit or focal point with a clear mandate, authority and resources to advise on, coordinate and oversee corruption prevention measures. Where appropriate, such entities could form part of the internal or administrative prison inspection scheme that is required as per the Nelson Mandela Rules. Half of the Member States that responded to the UNODC questionnaire

already have such units in place.⁶³ The unit could support inspections, risk management, staff training on code of conduct and other accountability measures. These units, however, do not replace independent prison inspections⁶⁴ nor action from law enforcement to which any suspected corruption cases should be promptly referred.



ENGLAND AND WALES: COUNTER-CORRUPTION UNIT AND PREVENTIVE MEASURES

His Majesty's Prison and Probation Service (HMPPS) established a Counter Corruption Unit (CCU) within the Directorate of Security to coordinate prevention, detection and enforcement measures across prisons and probation services. The CCU consists of some 145 national and local staff, including designated Counter Corruption Managers in each prison and is supported by periodic audits conducted by the Government Internal Audit Agency. Preventive measures include a counter-corruption training package, resilience and support meetings for staff identified as being at heightened risk of corruption, and a lessons-learned process that integrates findings from concluded cases into future prevention strategies. In 2024, HMPPS reported 45 criminal justice outcomes for corruption-related misconduct, demonstrating an established framework linking prevention, staff support and accountability.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

4.1.4 Recruitment, selection and promotion

Transparent and fair recruitment processes help prevent corruption.⁶⁵ Many countries have adopted guidelines for the transparent and fair recruitment of the civil service, which also applies to prison staff.⁶⁶

⁶³ UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]

⁶⁴ *Nelson Mandela Rules*, Rule 83(1)(b).

⁶⁵ *UNCAC*, art. 7 includes provisions addressing the human resources management of officials working in the public sector, which apply to prison staff, including provisions proscribing procedures that should be transparent and appointments merit-based.

⁶⁶ See, for example, The African Charter for Public Service in Africa, adopted at the sixteenth Ordinary Session of the Assembly of the African Union (Addis Ababa, 2011 Jan. 31); and, The Ibero-American Charter for the Public Service, adopted at the fifth Ibero-American Conference of Ministers for Public Administration and State Reform (Santa Cruz de la Sierra, Bolivia, 2003 Jun. 26 and 27) as part of the thirteenth Ibero-American Summit.



GUYANA: STRUCTURED RECRUITMENT BOARD TO PREVENT CORRUPTION

The Guyana Prison Service has established a dedicated recruitment board to safeguard transparency and integrity in staff selection and promotions. The Board is responsible for shortlisting candidates, conducting multi-stage interviews and recommending suitable applicants to the Ministry of Home Affairs. It also advises the Ministry on recruitment matters and ensures decisions align with established rules, job specifications and regulatory guidelines.

Source: Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

Recruitment of prison staff should be public, clear, fair, non-discriminatory and based on merit. Integrity testing can help assess how candidates are likely to respond in difficult situations they might face in the course of their daily work.

Selection should assess qualifications, physical abilities, and the potential to acquire new skills and integrity, which are fundamental for working in prisons. Checks should be put in place to prevent recruitment based on personal connections. These measures ensure selection is merit-based rather than influenced by personal ties.

The same principles apply to promotions, which should be merit-based, competitive and supported by objective, auditable procedures, clear reporting of results, the involvement of external stakeholders in promotion boards, and rigorous management oversight.

Vetting and background checks,⁶⁷ including criminal record checks, are important to identify those susceptible to corruption or other criminal conduct. Most Member States (73 per cent) that responded to the UNODC questionnaire conduct vetting at the recruitment stage⁶⁸ and it should continue, particularly for staff in high-risk roles or settings. Vetting standards should also apply to external, seconded and contracted staff and service providers through clear agreements and procurement requirements.

⁶⁷ See, OHCHR (2006). *Rule-of-Law Tools for post-conflict states—Vetting: An operational framework*.

⁶⁸ UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]



SINGAPORE: INTEGRITY AND VETTING SYSTEM FOR PRISON STAFF

The Singapore Prison Service (SPS) maintains a comprehensive integrity system grounded in both the Prisons Act and the Prevention of Corruption Act. These laws explicitly prohibit corrupt practices, regulate prison staff conduct and impose penalties for improper payments, misuse of supplies and unauthorized communications. SPS complements this with a zero-tolerance approach and mandatory reporting of suspected corruption to the Corrupt Practices Investigation Bureau (CPIB).

At the operational level, SPS applies rigorous preventive measures throughout the employment cycle. Recruitment includes background checks, security screening, psychometric assessments and a formal probation period. Officers continue to undergo integrity controls during service, including annual and ad hoc declarations of assets and financial positions and mandatory Annual Credit Screening to identify staff with financial vulnerabilities.

Staff in sensitive functions are subject to periodic job rotation and mandatory block leave, during which supervisors review documentation and processes for irregularities. Conflict-of-interest declarations, restrictions on casino visits for financially at-risk staff, annual code of conduct quiz, and regular awareness messaging further reinforce professional boundaries. Although corruption cases are rare, any substantiated offences result in prosecution under the Prevention of Corruption Act and dismissal from service.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

4.1.5. Conflicts of interest and asset declarations

Staff should be required to declare and manage conflicts of interest under clear rules. Nonetheless, of the Member States that responded to the UNODC questionnaire, only 67 per cent apply conflict-of-interest rules.⁶⁹ The potential for conflicts of interests might vary, depending on whether prison staff are in charge of supervising prisoners (e.g., supervising family visits or logging and checking correspondence of prisoners with the outside world) or whether they work in administrative departments (e.g., financial management, human resources or procurement). Measures include mandatory declarations, guidance mechanisms, role restrictions and sanctions for non-compliance.

⁶⁹UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]



MALTA: MANAGING CONFLICTS OF INTEREST

Malta's prison administration operates within a uniquely small social environment, where staff often have personal or family ties with people in custody. These close community connections can lead to conflicts of interest and create inherent integrity risks, including favouritism or undue influence. To mitigate these vulnerabilities, the Correctional Services Agency (CSA) applies clear safeguards: staff who have close personal or family relationships with specific prisoners are not assigned to supervise or interact with them. This prevents over-familiarity and helps maintain professional distance in a prison system where such risks are structurally higher. These measures operate within a broader oversight framework established under the Prisons Act (Cap. 260) and the Prisons Regulations (S.L. 260.03). The Regulations provide for the Corradino Correctional Facility Monitoring Board (CCFMB), an independent body responsible for inspecting the facility, hearing prisoner complaints and submitting annual reports to the Minister. Alongside this external oversight, a Risk Analysis Unit within the CSA monitors both staff and prisoner dynamics to identify integrity risks and ensure compliance with operational procedures, including searches, visits, key-management and staff conduct.

Source: UNODC Preventing Corruption in Prisons through Corruption Risk Management Questionnaire (2025). Official questionnaire submission by Malta.

In addition, asset declarations should apply to senior officials and prison staff working in high-risk functions, such as procurement.



GEORGIA: DECLARATION OF ASSETS

Georgia has developed a transparent asset declaration system that extends to all public officials, including those in the penitentiary administration. The Law on Conflict of Interest and Corruption in Public Service (No. 2306, adopted 17 October 1997, last amended 2022) obliges officials to submit annual electronic declarations of income, property and gifts through the Civil Service Bureau's online portal. The system automatically cross-checks data against tax and property registers and makes all declarations publicly accessible, enhancing accountability and enabling public scrutiny. Within the Special Penitentiary Service, these declarations form part of integrity-vetting and internal audit procedures, helping to detect conflicts of interest and prevent illicit enrichment.

Source: https://anticor.world/en/main/news_page/georgia_amends_its_anticorruption_legislation

4.1.6 Strengthening reporting channels and mechanisms

Safe, confidential and effective reporting mechanisms, which ensure that any complaint is promptly dealt with and replied to without delay, are critical to prevent, detect and address corruption in prisons. While 92 per cent of Member States that responded to the UNODC questionnaire have secure channels for reporting corruption or misconduct in prisons,⁷⁰ formal channels alone are often insufficient. In closed institutions,⁷¹ rigid hierarchies and power imbalances may deter prisoners and staff from reporting due to fear of retaliation, transfers, victimization or loss of rights and privileges. The Nelson Mandela Rules highlight the need for respective safeguards,⁷² without which wrongdoing can remain hidden, corruption can persist and complaints can be put at risk.

A broad understanding of “reporting persons” is critical, encompassing prisoners, their relatives, prison staff, lawyers, paralegals, civil society actors and other external actors.⁷³ This aligns with UNCAC,⁷⁴ which calls for measures that facilitate reporting and protect those who report in good faith and on reasonable grounds, as well as witnesses, experts and victims from retaliation or intimidation. Recognizing prisoners and their relatives as reporting persons ensures that their disclosures are protected, including safeguards for identity, physical security and against reprisal.

In line with the Nelson Mandela Rules, prisoners should be informed upon admission about relevant laws and regulations, staff conduct standards and available external and internal complaint and reporting procedures.⁷⁵ Information should be clear, accessible and explain confidential channels, including the right to communicate with legal representatives and oversight bodies.

Internal mechanisms for requests and complaints should prioritize safety, discretion and, as requested, confidentiality. Concrete measures should, where appropriate, be adapted to the physical layout and category of each facility and may include the following:

- Secure complaint boxes away from surveillance
- Provision of writing materials and sealed envelopes
- Designated, trained and vetted personnel to receive and handle complaints sensitively and confidentially
- Confidential hotlines staffed by trained male and female officers and
- Secure in-person reporting options

Reporting mechanisms should also be gender-sensitive.⁷⁶ Staff training should cover confidentiality, anti-retaliation safeguards and gender-related concerns to ensure all individuals feel safe when reporting.

⁷⁰ UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]

⁷¹ Closed systems make discreet communication difficult, surveillance can deter confidential disclosure, and cultural pressures may discourage staff from reporting colleagues.

⁷² *Nelson Mandela Rules*, Rule 57(2).

⁷³ *Nelson Mandela Rules*, Rule 56. Note that Rule 56(4) extends the right to complain to the prisoner’s legal adviser and, in case neither the prisoner nor the prisoner’s legal adviser are able to exercise this right, to the prisoner’s family or any other person who has knowledge of the case.

⁷⁴ *UNCAC*, arts. 32 and 33.

⁷⁵ *Nelson Mandela Rules*, Rules 54–57.

⁷⁶ UNODC (2020). *The Time is Now: Addressing the Gender Dimensions of Corruption*.

Internal channels alone are rarely sufficient, though and should come along with *external mechanisms* for requests and complaints. Prisoners should be able to communicate freely and confidentially with independent external oversight bodies, including representatives from national preventive mechanisms, legal advisers and other competent authorities.

In addition, other reporting mechanisms, such as integrity hotlines, dedicated websites and secure apps, allow anonymous reporting by prisoners, staff, family and visitors. Systems modelled on lawyer–client confidentiality strengthen trust and protect sensitive information. Families and external actors play a crucial role in detecting wrongdoing, in particular when prisoners fear retaliation.

Front-line prison staff may witness corruption and misconduct yet face peer pressure to remain silent.⁷⁷ Prison management should actively address such barriers fostered related to an institutional culture and ensure protections consistent with UNCAC for public officials reporting corruption and misconduct.⁷⁸



SLOVAKIA: LEGAL FRAMEWORK FOR PROTECTING PEOPLE REPORTING CORRUPTION

Slovakia has established a legal framework to protect individuals who report corruption or other serious wrongdoing. The Act on the Protection of Persons Who Report Anti-Social Activities (No. 54/2019 Coll.) prohibits dismissal, demotion or any retaliation against whistle-blowers acting in good faith. Public institutions, including the Corps of Prison and Court Guard, must maintain confidential reporting channels and appoint a responsible officer to manage and verify reports. Amendments introduced by Act No. 189/2023 Coll. further strengthened protections. The scope of reportable conduct now covers all offences punishable by more than two years' imprisonment; fines for retaliation or non-compliance were increased to €100,000 for large institutions; and employers must respond to reports within 90 days. Protection also extends to contractors and volunteers, reflecting a broader approach to integrity risks in public service. Oversight is provided by the Whistle-blower Protection Office (*Úrad na ochranu oznamovateľov protispoločenskej činnosti*), an independent authority empowered to monitor compliance and sanction breaches. Within the Slovak prison system, this framework creates a safer environment for reporting misconduct, embedding whistle-blower protection within the broader integrity and accountability structure.

Source: Act No. 54/2019 Coll. on the Protection of Persons Who Report Anti-Social Activities (as amended by Act No. 189/2023 Coll.). Government of the Slovak Republic.

⁷⁷The fear of retaliation and victimization can prevent them from reporting colleagues or managers for their acts of corruption. See, Porter, L.E., & Prenzler, T. (2016). The code of silence and ethical perceptions: Exploring police officer unwillingness to report misconduct. *Policing: An International Journal of Police Strategies & Management*, 39(2), 370–386; Penal Reform International (2015). *Institutional culture in detention: A framework for preventive monitoring. A detention monitoring tool resource* (2nd ed.), p. 9.

⁷⁸United Nations (2003). *UNCAC*. See, art. 8(4) establishing measures and systems, arts. 32 and 33 witness protection measures, art. 37 cooperating offenders, and art.13(2) anonymous reporting line.



LITHUANIA: STRENGTHENING REPORTING AND INTEGRITY OVERSIGHT

The Lithuanian Prison Service operates a dedicated Trust Line, which enables prisoners, visitors, staff members and external stakeholders to report potentially unlawful or improper conduct confidentially, anonymously or publicly. Reports can be submitted by phone or email, ensuring accessible and safe communication channels for individuals inside and outside the prison system. In 2023 and 2024, the Prison Service significantly increased the visibility of the Trust Line through emails, briefings, training sessions and by placing Trust Line contact information in all facilities. As a result, reporting activity increased substantially, from 196 reports in 2023 to 480 reports in 2024, reflecting greater use of internal reporting mechanisms. All Trust Line reports are received and processed by the Immunity and Internal Investigations Division, which conducts inspections, initiates internal investigations, where required and coordinates preventive measures. The division also analyses reporting data to identify patterns and recommends institutional improvements. This combination of accessible channels and structured follow-up strengthens the Prison Service's ability to detect, investigate and prevent integrity violations.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

4.1.7 Implementing transparent and equitable rehabilitation programmes

The Nelson Mandela Rules highlight that a rehabilitative approach to prison management is central to translating the primary objectives of incarceration (i.e. protecting crime and preventing recidivism) into practice.⁷⁹ Treating rehabilitation and social reintegration support as a primary goal, rather than a secondary benefit or afterthought, can also help to reduce corruption risks.

Without structured rehabilitation programming, informal privilege systems can emerge, fostering bribery, extortion and favouritism. Transparent and equitable access to quality rehabilitation programmes can reduce corruption by clarifying entitlements, standardizing procedures, strengthening staff professionalism and demonstrating fairness.⁸⁰ Programmes should be properly resourced, transparently managed and regularly reviewed to ensure that access is based on need, not personal connections or illicit payments.

4.1.8 Coordinating with other sectors and stakeholders

Prisons should coordinate with a diverse range of stakeholders, including the police, judiciary, private sector, academia and civil society. These actors can help strengthen integrity,

⁷⁹ *Nelson Mandela Rules*, Rule 4.

⁸⁰ UNODC (2009). *Handbook on Prisoners with Special Needs*, pp. 11–15. Criminal Justice Handbook Series.

report corruption and misconduct, conduct research and share good practices. One productive approach is to develop an inter-agency forum for coordination and information sharing.⁸¹

Legal frameworks against corruption should be broad enough to cover all individuals that perform public functions, including private sector staff,⁸² ensuring the conduct of staff is covered by the full force of law, including criminal law. When prisons are decentralized or privatized, oversight, transparency and monitoring mechanisms must be in place. Checks and balances should include prisoner surveys, periodic unannounced public inspections and independent monitoring (such as National Preventive Mechanisms).

Service delivery indicators should be included in any prison performance contracts with external organizations to help detect corruption. Examples include indicators to monitor budgets, prevent counterfeit or poor-quality items and track key performance outputs before payments.

4.2 People-based corruption risk mitigation strategies

People-based corruption risk mitigation strategies prevent corruption by focusing on the behaviour and integrity of staff rather than the process itself. This chapter provides examples of key people-based strategies and promising practices.

4.2.1 Effective prison leadership and management

Effective leadership is crucial for fostering integrity, ethical conduct and public confidence in prison systems. The attitudes and actions of senior officials strongly influence institutional culture and the behaviour of staff at every level. Professional, fair and transparent leadership sets a tone that discourages corruption and strengthens morale.

Senior management in prison administrations should aspire to “conspicuously ethical leadership”,⁸³ create a culture in which corruption is not tolerated,⁸⁴ and adopt a principle-based approach that encourages mature and professional behaviour by prison staff.⁸⁵ They should model ethical behaviour, foster a positive team climate and support staff well-being.⁸⁶ In order to be able to do so, senior prison officials require tailored leadership programmes that can provide practical training on ethical decision-making, risk assessment, compliance and communication.

⁸¹Chêne, M. (2009). *Coordination methods of anti-corruption institutions*. U4 Anti-Corruption Resource Centre, Expert Answers. (Transparency International, and Chr. Michelsen Institute). See also, HM Prison & Probation Service & National Police Chiefs’ Council. (2019 Apr. 15). *Memorandum of Understanding—An agreement between Her Majesty’s Prison and Probation Service and the National Police Chiefs’ Council regarding corruption in prisons and probation*.

⁸²UNCAC, art. 2 encourages a broad understanding of the term “public official” to include “any other person that performs a public function, including for a public agency or public enterprise, or provides a public service” even if they are not employed directly by the State.

⁸³Goldsmith, A. (2001). The pursuit of police integrity: Leadership and governance dimensions. *Current Issues in Criminal Justice*, 13(2), 185–202.

⁸⁴Amaechi, T. (2017 Nov.) Guidance document for the Unit on key causes of corruption in law enforcement settings and measures to take to prevent corruption in law enforcement settings. Penal Reform International.

⁸⁵Souryal, S.S. (2009). Deterring corruption by prison personnel: A principle-based perspective. *The Prison Journal*, 89(1), 21–45.

⁸⁶Vogel, J., Sauter, J., Vogel, B.O., & Dahle, K.P. (2020). Targeting misconduct in prison by modifying occupational factors in correctional facilities. *Frontiers in Psychiatry*, 11(517), 1–7.

Furthermore, a strong institutional structure based on clear responsibilities and procedures for all processes is essential for curbing corruption. In an unstructured environment and in the absence of clear and formalized rules, prison staff might see corruption practices as “the way things are done”, and their behaviour may be influenced by the real or perceived likelihood of getting caught or sanctioned for misconduct.

Proper supervision of prison staff (including through regular performance appraisals), a reinforcement of responsibilities, rules and procedures (including through incentives and sanctions) and setting clear boundaries⁸⁷ are essential to preventing corruption. Supervisors should discuss core values in annual appraisals and integrate integrity into other relevant staff management measures, such as when considering someone for promotion.

4.2.2 Creating and disseminating codes of conduct

Although prison staff are often bound by a general code of conduct for public officials,⁸⁸ a prison-specific and tailored code can increase its relevance, legitimacy and effectiveness.⁸⁹ Ninety-two per cent of the countries that responded to the UNODC questionnaire had sector-wide or national codes of conduct in place for the prison system.⁹⁰ These codes clarify expectations, thus “helping to instill fundamental standards of behaviour that curb corruption”.⁹¹ They protect staff who comply with it and conversely warn of the consequences of failing to act ethically, thus providing the basis for disciplinary action.⁹² The code of conduct must be enforceable, be closely aligned with the applicable formal disciplinary system and, where possible, extend to external staff to ensure clarity and compliance.



GHANA: PROFESSIONAL STANDARDS AND ETHICS CODE

The Ghana Prisons Service operates under the Prisons Service Act 1972 (NRCD 46) and applies an internal Code of Conduct and Ethics for all officers, aligned with the Public Service Code of Conduct. The code outlines standards on discipline, honesty, impartiality and relations with prisoners. Training institutions within the service integrate the Code into recruitment and leadership courses and periodic refresher sessions reinforce expectations. Oversight is provided through the Professional Standards and Disciplinary Mechanism, supported by the Internal Audit Unit and the Ministry of the Interior.

Source: Ghana Prisons Service (website).

⁸⁷Peterson, B.E., & Kim, K. (2025). Staff as a conduit for contraband: developing and testing key assumptions of professional boundary violations in prison. *Deviant Behavior*, 46(4), 481–499.

⁸⁸UNCAC, art. 8, highlights the need to have and apply codes or standards of conduct for public officials.

⁸⁹Cornelius, G. (2021 Dec. 20). *Doing the right thing: The importance of ethics in corrections*. Lexipol [Online news].

⁹⁰UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]

⁹¹UNODC (2009). *Technical guide to the United Nations Convention against Corruption*, p. 19. Also, *Nelson Mandela Rules*, Rule 77 states that prison staff shall at all times conduct themselves and perform their duties so as to influence the prisoners for good by their example and to command their respect.

⁹²See, for example, Council of Europe, (2012 Apr. 12). *European code of ethics for prison staff*. Recommendation CM/Rec(2012)5 of the Committee of Ministers to Member States.



BRAZIL: ETHICAL STANDARDS FOR PRISON CONTRACTORS AND SERVICE PROVIDERS

The Federal Code of Conduct for Civil Servants (Decree No. 1.171/1994, updated 2020) of Brazil applies not only to prison staff but also to private contractors and external professionals who work inside correctional facilities under the authority of the National Penitentiary Department (DEPEN). DEPEN's Integrity and Compliance Policy (Portaria No. 222/2021) requires that all service provision, maintenance and training contracts include an integrity clause obliging adherence to the federal Code of Conduct and the institution's internal ethics norms. Breaches can result in contract suspension or termination. This ensures that public-sector ethical standards extend to all individuals performing functions or delivering services within federal prisons.

Source: Government of Brazil, Decree No. 1.171/1994—Código de Ética Profissional do Servidor Público Civil do Poder Executivo Federal and National Penitentiary Department (DEPEN), Portaria No. 222/2021—Política de Integridade e Compliance do DEPEN, Ministry of Justice and Public Security.

FRANCE: DIGITAL ETHICS TOOLS AND MULTI-LEVEL CODES OF CONDUCT

The French prison administration has introduced several mechanisms to strengthen ethical conduct and assist prison staff in identifying and managing integrity risks. At the national level, the *École Nationale d'Administration Pénitentiaire* (ENAP) developed two digital tools: the “ethics meter”, which guides staff through ethical dilemmas and the “AntiCor Pass”, an online self-assessment instrument enabling staff to evaluate their individual and institutional exposure to corruption risks. France has also implemented a mandatory Oath of Office for all prison officers, established under Law No. 2021-1109 and Decree No. 2024-837. By August 2025, 6,116 officers had taken the oath. At the institutional level, each prison and probation service (SPIP) is required, under the Sapin II framework, to co-develop a local anti-corruption code of conduct with staff and external partners. Compliance with these codes is monitored through inspection grids, ensuring that ethical standards are embedded in daily practice across facilities.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

4.2.3 Prison staff training

The Nelson Mandela Rules dedicate particular attention to the need for quality induction and in-service training for prison staff, including on their rights and obligations.⁹³ UNCAC further specifies training for staff at risk of exposure to corruption.⁹⁴ New prison staff should

⁹³ *Nelson Mandela Rules*, Rules 75–76.

⁹⁴ *UNCAC*, art. 7(1)(d).

receive clear role guidelines, sufficient technical training and instruction on how to detect and prevent corruption before they commence their duties. Training should continue throughout staff careers, prepare them for high-risk roles, as applicable, and promote professionalism.⁹⁵

Given the significant risk of corruption to which prison staff are exposed, integrity and accountability should be included in all training, either integrated throughout curricula or in dedicated corruption prevention modules. Another specific feature of prison life that needs to be considered in prison staff training is that prisoners might endeavour to manipulate⁹⁶ and condition prison staff.⁹⁷ Training should therefore combine written guidance with interactive, adult learning approaches, such as role plays and practical scenarios, to enable staff to handle such attempts professionally.⁹⁸



THAILAND: EMBEDDING ETHICS AND MORAL PRINCIPLES IN STAFF TRAINING

Thailand integrates anti-corruption awareness into all levels of staff development, from new recruits to senior commanders. Training programmes emphasize ethics, misconduct prevention and clear reporting channels. As part of the national Moral Organization initiative, all personnel are trained to uphold five core moral principles: Sufficiency, Discipline, Integrity, Public-mindedness and Gratitude. The Department of Corrections reports that this ethical training framework, combined with regular reinforcement through declarations of honest intent, has contributed to a downward trend in corruption cases within the prison system.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

POLAND: ANTI-CORRUPTION STAFF TRAINING

Within the framework of cooperation with the Central Anti-Corruption Bureau, training courses are organized for prison service officers and employees on counteracting corruption. Training programmes include: explanation of basic concepts related to corruption; discussion of concrete forms of corruption; the most common corruption behaviours; presentations of the legal consequences of corrupt behaviour and ways to prevent or counter corruption on the basis of concrete scenarios; and the legal and institutional avenues for prosecuting corruption in Poland.

Source: Jaroszevska, M. (2024). Corrupt behavior and the safety of organizational units of the Prison Service. *Nowa Polityka Wschodnia*, 44(4), 147–160.

⁹⁵ See, 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.

⁹⁶ Pittaro, M. (2022 May 11). Prison corruption: A glimpse into manipulation tactics. *Psychology Today* [Blog].

⁹⁷ Gangi, A. (2020). *Inmate manipulation decoded: A definitive guide to understanding the manipulation process*. 20/20 Living Inc.

⁹⁸ See, for example, UK Parliament. Written questions, answers and statement. Questions for the Ministry of Justice. *Prisons: Bribery* (2024 Feb. 23); *Prison Officers: Dismissal* (2024 Feb. 06); and *Prison Officers: Labour Turnover* (2024 Jan. 29).



HONG KONG, CHINA: CONTINUING INTEGRITY TRAINING AND ETHICAL GOVERNANCE

The Hong Kong Correctional Services Department (CSD) promotes integrity and ethical conduct through continuous training, collaboration with the Independent Commission Against Corruption (ICAC) and clear civil service standards. The Department's integrity framework emphasizes ongoing professional development, including a Postgraduate Certificate in Correctional Governance and Leadership and regular integrity seminars delivered jointly with ICAC. Staff are required to uphold the civil service core values of honesty, impartiality and accountability, reinforced through workshops, case-based discussions and internal communications. The Civil Service Bureau (CSB) supports these efforts by issuing guidance and monitoring compliance across all departments. According to the CSD's Annual Review 2022, this integrated approach – combining staff training, ethics guidance and inter-agency cooperation – continues to strengthen professional standards and sustain a workplace culture of zero tolerance for corruption and misconduct.

Source: Hong Kong Correctional Services Department, Annual Review 2022—Chapter 5 Staff Management, Independent Commission Against Corruption (Hong Kong), Training and Development, and Civil Service Bureau (Hong Kong), Government Remains Vigilant to Fortify the Culture of Integrity, 30 May 2025.

4.2.4 Remuneration, benefits and incentives

Corruption risk mitigation requires appropriate dedicated budgets to ensure adequate, timely salaries and benefits. At the same time, efforts should focus on improving overall working conditions, including with regards to safety and security, staff accommodation and the availability of proper equipment and uniforms.

While fair remuneration motivates staff and contributes to enhanced staff morale, it should be noted that higher salaries alone do not prevent corruption. Non-monetary recognition, such as Integrity Awards or well-being programmes, can reinforce ethical behaviour and professional culture. Importantly, comprehensive staff support systems, including employee assistance programmes (EAPs), counselling, resilience training, structured debriefing mechanisms and work-life balance policies, help prevent corruption by addressing personal, emotional and financial stress.

4.2.5 Prison staff rotation and integrity testing

Regular rotation of staff in high-risk or sensitive posts reduces corruption risks and manipulation.⁹⁹ Rotation might mean rotating assignments within the unit or prison or involve periodic rotation out of the unit or to another prison. Similarly, rotation among public procurement staff may contribute to preventing long-term relationships with external providers and associated corruption risks.

⁹⁹Chêne, M. (2009). *Coordination methods of anti-corruption institutions*. U4 Anti-Corruption Resource Centre, Expert Answers. (Transparency International, and Chr. Michelsen Institute).

Some countries use integrity testing by placing staff in controlled, potentially compromising situations to evaluate their actions.¹⁰⁰ Testing can be random or targeted and awareness of potential testing can deter misconduct. Thirty-eight per cent of the States that responded to the questionnaire report using this method.¹⁰¹ This being said, integrity testing is complex and legally sensitive and should be used only as a last resort by trained personnel under strict oversight.¹⁰²



GERMANY: CORRUPTION RISK ATLAS AND TARGETED SAFEGUARDS

Lower Saxony applies a structured, legally mandated approach to identifying and managing corruption risks across all public authorities, including the prison system. Under the *Antikorruptionsrichtlinie Niedersachsen* (AKorRL-Beschluss), public bodies must identify positions with elevated corruption risks and record them in a *Gefährdungsatlas* (Corruption Risk Atlas). The directive requires authorities to analyse these posts, classify risk levels and introduce targeted preventive measures where vulnerabilities are identified. In prison services, this includes the use of staff rotation at defined intervals, the two-person rule for sensitive tasks, and other organizational controls to reduce opportunities for undue influence. The directive also stipulates that risk assessments be updated at regular intervals, ensuring that preventive measures remain aligned with operational realities.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

4.2.6 Oversight and inspection mechanisms

Oversight should combine reactive mechanisms (investigating misconduct) with proactive monitoring to identify risks, monitor compliance and recommend systemic improvements. An effective oversight system, therefore, links internal inspection, audit and monitoring functions, with external independent bodies that are independent from the prison administration, such as prison inspectorates, national human rights institutions or national preventive mechanisms, where applicable.

Internal oversight (i.e., audits, inspections, integrity offices and complaint-handling systems) helps detect irregularities, monitor compliance and recommend corrective measures before problems escalate. It requires clear mandates, trained and impartial staff, transparent reporting

¹⁰⁰ Organisation for Economic Co-operation and Development (OECD). (2005). *Managing conflict of interest in the public sector: A toolkit*, p. 68.

¹⁰¹ UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]

¹⁰² See, for example, UK HM Prison Service. (2003 Feb. 17). *Professional standards: Preventing and handling staff wrongdoing*. Prison Service Order 1215, Annex E: Integrity Testing.

and independence from local management. Regular internal inspections help maintain professional standards and demonstrate institutional commitment to accountability.¹⁰³



MOROCCO: MULTI-LAYERED INTERNAL OVERSIGHT

The General Delegation for Prison Administration and Reintegration (DGAPR) of Morocco applies a structured system of internal oversight across key operational areas. Procurement is monitored through strict compliance with public contracting laws (including Decrees No. 2-22-431, 2-16-344 and the CCAG frameworks), supported by mandatory internal controls and the prior approval of the Treasury, with additional ex post reviews conducted by the Inspectorate General of Finance and the Court of Accounts. Recruitment and promotions are overseen through standardized competitive exams, selection commissions, background checks and objective promotion grids, ensuring transparent and controlled processes. Financial management is supervised through a formal management charter, annual performance projects and performance reports, which track institutional objectives and budget execution. Oversight also extends to the management of prisoner transfers, conducted under the authority of the central Transfer and Distribution Committee and to logistics, where regular audits review stock levels, maintenance and traceability to ensure compliance with internal procedures.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

External oversight (i.e., human rights institutions, ombuds offices, specialized anti-corruption agencies, national preventive mechanisms and United Nations or regional mechanisms, where applicable) ensures independent monitoring, promotes transparency and strengthens public confidence. Effective cooperation between prison administrations and oversight bodies is critical to ensuring accountability and sustaining institutional integrity, as well as understanding and addressing the root causes and systemic risks for corruption.

Civil society organizations, faith-based groups and independent visitors can provide informal monitoring, complementing formal oversight. Their regular presence in prisons allows them to observe staff–prisoner interactions, identify early signs of abuse or corruption and promote transparency through their engagement with staff and prisoners. Effectiveness depends on their independence, access to facilities and information, resources and competence.

¹⁰³ *Nelson Mandela Rules*, Rules 83–85, provide for a twofold system of regular inspections of prisons, involving internal or administrative inspections conducted by the central prison administration as well as external inspections conducted by a body independent of the prison administration.

4.2.7 Raising awareness among prisoners and prisoners' families

Prisoner councils can support anti-corruption efforts within prisons. Consultations with prisoner councils promote transparency and ensure that prisoners' views are heard but must not transfer staff responsibilities. Abdicating staff responsibilities (e.g., by placing prisoners in charge of decisions directly concerning other prisoners, especially in cases that involve a disciplinary capacity) increases corruption risks and must be avoided.¹⁰⁴

In addition to the above, prisoners' families play a key role in preventing corruption. Awareness-raising campaigns should keep families abreast of prison life and relevant processes, including existing reporting procedures.

Family members of incarcerated people may be vulnerable to corruption, as they may be asked – contrary to international minimum prison standards – to pay for the provision of essential goods or services for their incarcerated spouses or relatives. At the same time, they may also be involved in smuggling contraband into prisons. Supporting and engaging families, including through civil society and information campaigns, therefore strengthens anti-corruption efforts.¹⁰⁵



NORWAY: STRUCTURED PRISONER CONSULTATION AND REPRESENTATION

The Correctional Service of Norway integrates structured prisoner participation into prison management through prisoner councils (*Innsatteråd*). These councils meet regularly with prison administrators to discuss daily-life matters, such as food, recreation, education and visiting arrangements. The purpose is to enhance transparency, communication and mutual understanding while maintaining staff authority over decisions that affect security and discipline. The Correctional Service's ethical framework explicitly defines these councils as consultative bodies—ensuring that prisoner input supports integrity and accountability without transferring decision-making power. The approach has been credited with reducing tensions, improving grievance management and strengthening institutional trust.

Source: Norwegian Correctional Service (Kriminalomsorgen), Inmate Councils and Participation Framework (2022).

¹⁰⁴ *Nelson Mandela Rules*, Rule 40(1).

¹⁰⁵ As one example, the Prisoners Advice and Care Trust (PACT) in the United Kingdom, which is a Catholic charity working in the criminal justice system.



PERU: TRANSPARENCY CAMPAIGN FOR PRISONERS AND THEIR FAMILIES

In 2021, the National Penitentiary Institute (INPE) of Peru launched the campaign *Transparencia y Dignidad en el Sistema Penitenciario* (Transparency and Dignity in the Prison System), supported by the Ministry of Justice and Human Rights. The initiative targeted both prisoners and their families through posters, social-media messages and visitor-centre outreach. It emphasized that the provision of essential services, including visits, medical appointments and document requests, are free of charge under Law No. 29709—Penitentiary Code of Conduct. Staff and visitors were encouraged to report any request for money or favours through an anonymous hotline managed by INPE's Integrity and Transparency Office. The campaign has since been integrated into regular prison visiting briefings.

Source: Instituto Nacional Penitenciario (INPE), *Transparencia y Dignidad en el Sistema Penitenciario* campaign (2021), and Ministry of Justice and Human Rights (Peru), Oficina de Integridad y Transparencia Institucional.

4.3 Enforcement-based corruption risk mitigation strategies

Enforcement-based corruption risk mitigation strategies are the third category of corruption risk mitigation. Even with the best preventive measures, instances of corruption in prisons will occur. Enforcement-based strategies respond to such cases while also serving as powerful deterrents.

4.3.1 Prison intelligence systems and technology

Collecting indicative information is essential for ongoing monitoring of corruption risks. Prisons should establish intelligence units staffed with trained personnel capable of producing reliable, actionable insights. Prison intelligence should draw on multiple sources, including complaints, whistle-blower reports, contraband statistics (e.g., smuggled mobile phones),¹⁰⁶ and data on investigations and adjudicated disciplinary or criminal cases. Informal information from staff–prisoner interactions is also valuable in building a comprehensive picture of corruption risks.¹⁰⁷

¹⁰⁶Russo, J., Woods, D., Shaffer, J., & Jackson, B. (2019 Jul. 31). *Countering threats to correctional institution security*. Rand Corporation.

¹⁰⁷See, for more information on prison intelligence, UNODC (2015). *Handbook on Dynamic Security and Prison Intelligence*. Criminal Justice Handbook Series.

Prison intelligence should form part of a broader law enforcement network, with mutual information-sharing, as appropriate. Prison administrations may formalize respective collaboration schemes with the police, including through agreements or joint task forces.



NIGERIA: INTEGRATED PRISON INTELLIGENCE AND ANTI-CORRUPTION UNIT

The Correctional Service of Nigeria has established an Intelligence and Investigation Directorate responsible for gathering and analysing information on threats, including corruption, organized crime and contraband trafficking. The unit operates at national and facility levels and maintains liaison officers in each correctional centre. It compiles data from disciplinary investigations, visitor logs, searches and staff conduct reports. In coordination with the Independent Corrupt Practices and Other Related Offences Commission (ICPC), the Directorate tracks indicators of corruption risk, such as unauthorized communications, bribery attempts and supply-chain manipulation. The system contributes to early detection of misconduct and supports administrative and criminal follow-up actions.

Source: Nigerian Correctional Service Directorate of Intelligence and Investigation, Ministry of Interior.

Many prison systems increasingly rely on technology to contribute to the deterrence or detection of wrongdoing and misconduct, such as CCTV, audio-video monitoring, scanners for contraband and electronic prisoner records with secure audit trails.¹⁰⁸ Video footage can support allegations as evidence where proper chain-of-custody procedures are followed. Digital systems can also detect unauthorized access to restricted areas or files and track all modifications, reducing opportunities for abuse.^{109,110}

Technology should, however, not unduly infringe prisoners' rights or privacy. A careful balance is required between safeguarding fundamental human rights and leveraging technology for effective corruption prevention and detection.¹¹¹ For further guidance, see the UNODC *Handbook on the Use of Technology in Prison Settings*.

¹⁰⁸ *Nelson Mandela Rules*, Rule 6.

¹⁰⁹ Goldsmith, A., Halsey, M., & Groves, A. (2016) *Tackling Correctional Corruption* (pp. 131–132). Crime Prevention and Security Management (CPSM) series. Palgrave Macmillan.

¹¹⁰ See, UNODC (2026). *Handbook on the Use of Technology in Prison Settings*. Criminal Justice Handbook Series.

¹¹¹ *Ibid.*



BRAZIL: DIGITAL RISK ANALYSIS TOOLS IN THE PRISON SECTOR

The National Secretariat for Penal Policies (SENAPPEN) of Brazil has developed a structured, intelligence-led approach to identifying vulnerabilities and corruption risks in prisons. A central component of this approach is the DELFOS platform, designed by SENAPPEN's Directorate of Penal Intelligence to support institutional risk analysis, organizational security and staff protection. According to the national submission, DELFOS enables prison authorities to identify vulnerabilities across different operational areas in a systematic and coordinated manner. The platform is used together with two standardized methodologies: the Exceptional Staff Risk Analysis (ARES) and the Organizational Security Risk Analysis (ARSO). These methodologies guide the assessment of staff-related risks and institutional weaknesses, ensuring that prison intelligence activities are grounded in clear criteria and consistent analytical processes. This combination of tools strengthens the capacity of prison administrations to detect early warning signs, prioritize risks and take preventive measures.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

MALAYSIA: TECHNOLOGY STRENGTHENING TRANSPARENCY AND DETECTION

Malaysia has adopted a range of technology-based tools to reduce corruption risks in prisons. The Malaysian Prison Department reports the use of CCTV surveillance and digital monitoring systems, which support oversight, allow early detection of misconduct and reduce opportunities for undetected irregularities. Electronic record systems and digital documentation further strengthen audit trails and help identify anomalies in routine operations. These measures are complemented by technology supporting financial and administrative transparency. At the individual prison level, cashless swipe machines limit cash handling and reduce opportunities for informal payments. At headquarters level, an e-procurement system standardizes contracting processes and minimizes discretionary decision-making. These digital tools reinforce integrity, enhance detection and promote more transparency in prison governance.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

4.3.2 Effective internal corruption investigation processes

Effective internal investigation processes are crucial for deterring, detecting and resolving corruption, while building confidence that reports will be taken seriously. Investigations should be carried out transparently, objectively and without being used as a tool to pressure or intimidate staff.

A comprehensive internal investigation policy should be developed, with all prison staff trained on its implications for their roles, responsibilities and rights. Procedural safeguards should also be provided to protect investigations from undue influence or conflicts of interest.

Furthermore, clear communication channels with law enforcement are necessary to ensure that cases involving potential criminal conduct can be promptly referred. In this regard, it is important to recall that in line with the Nelson Mandela Rules and notwithstanding the initiation of internal investigations, a judicial or other competent authority that is independent from the prison administration should be notified, without delay, for the initiation of external investigations into any case of custodial death, disappearance or serious injury. This obligation equally applies whenever there are reasonable grounds to believe that an act of torture or ill-treatment has been committed in prison.



LITHUANIA: INTERNAL INVESTIGATIONS AND IMMUNITY DIVISION

The Lithuanian Prison Service (LPS) operates an Immunity and Internal Investigations Division responsible for detecting, preventing and investigating corruption and other offences by prison staff. This division conducts confidential inquiries into complaints or intelligence reports from prison staff, prisoners or the general public. It can initiate internal investigations, disciplinary procedures or preventive interviews based on findings. A dedicated Trust Line (anonymous hotline and email account) allows for confidential reporting. Reports are logged and reviewed solely by the division to ensure impartiality and protection of the source. Investigations are supported by regular audits and legal oversight from the Ministry of Justice, National Audit Office, Special Investigation Service (STT) and Chief Official Ethics Commission (VTEK). In 2024, LPS registered four pretrial investigations for abuse of office, two corruption-related inquiries (one referred to by the court) and over 160 official inspections. Sanctions included reprimands, suspensions and dismissals. Annual activity reports publicly summarize results, reinforcing institutional transparency and accountability.

Source: Lithuanian Prison Service Annual Reports (2023–2024).



COLOMBIA: INTERNAL DISCIPLINARY CONTROL OFFICE

The National Penitentiary and Prison Institute (INPEC) of Colombia operates a formal internal investigation mechanism through its Internal Disciplinary Control Office, which handles both preventive and corrective integrity functions under the General Disciplinary Code (Law 1952 of 2019). The Office receives and verifies complaints submitted through internal mailboxes, the official complaints and reporting system used by Colombian public institutions, its institutional email account, online reporting tools and telephone channels. When there is enough information to proceed, the Office initiates disciplinary proceedings, formulates charges and imposes sanctions, such as dismissal or disqualification. If conduct may constitute a criminal offence, cases are referred to external authorities, including the Attorney General's Office, Prosecutor General's Office or Comptroller General. INPEC reports that investigations have resulted in disciplinary actions and preventive early warnings to prison directors to address emerging risks.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

4.3.3 Disciplinary and criminal procedures

UNCAC outlines how Member States should prosecute and sanction public officials involved in corruption.¹¹² Within prisons, disciplinary frameworks should be clearly defined in primary prison legislation and staff regulations, including transparent sanctions and fair procedures. Staff should be given the opportunity to respond to allegations, participate in hearings and appeal decisions. Proper record-keeping and timely documentation of proceedings are essential to ensure transparency, consistency and public confidence.

While disciplinary proceedings, which are often based on lower standards of proof, may proceed more quickly, suspected criminal conduct must not be handled solely internally. Such cases should be promptly reported to competent authorities for potential criminal investigation and prosecution.

As far as prisoners are concerned, the disciplinary processes should closely follow minimum standards as outlined in the Nelson Mandela Rules.¹¹³ Serious criminal acts involving corruption should be referred to external authorities, mirroring the above approach described for prison staff. Where criminal charges arise, prisoners are entitled to full legal safeguards, including access to legal counsel. However, it may be inappropriate to pursue disciplinary or criminal liability where conduct stems from attempts to meet basic needs (e.g., sufficient food or necessary healthcare), in particular in the context of systematic prison failures.

Communicating the outcomes of internal disciplinary measures or external law enforcement activities related to corruption can strengthen deterrence by demonstrating that misconduct

¹¹² UNCAC, art. 30.

¹¹³ Nelson Mandela Rules, Rules 36–46.

has real consequences. This may include publishing aggregated data on enforcement actions to highlight risk areas,¹¹⁴ and engaging with the media to publicize successful cases.

At the same time, recognizing and rewarding staff who demonstrate integrity is equally important. Highlighting positive role models reinforces ethical behaviour and supports broader anti-corruption efforts.



DOMINICAN REPUBLIC: PRISON GUARD PROSECUTED FOR ATTEMPTED DRUG SMUGGLING

In 2024, the First Collegiate Court of San Cristóbal convicted a prison guard and an accomplice for attempting to smuggle illegal drugs and electronic devices into a men's correction and rehabilitation centre. The case was uncovered when a woman attempted to deliver a package containing over one kilogram of cocaine and marijuana and several electronic devices hidden in a shoebox. The investigation established that two prison staff members had conspired to facilitate the entry of the package by bypassing security protocols. The Public Prosecutor's Office presented evidence demonstrating violations of multiple provisions of the Dominican Penal Code, national drug control legislation, the Constitution and the Inter-American Convention against Administrative Corruption. Both individuals were sentenced to five years in prison, with the court ordering that they serve their sentences at the same correctional facility.

Source: UNODC Questionnaire on Preventing Corruption in Prisons through Corruption Risk Management to Member States (August 2025).

¹¹⁴Ibid.