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Office on Drugs and Crime



Independent Commission Against Corruption
Hong Kong, China

Integrity Behind Bars:

A Guide on Corruption Risk Management in Prison Systems



UNITED NATIONS OFFICE ON DRUGS AND CRIME

Integrity Behind Bars: A Guide on Corruption Risk Management in Prison Systems



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Foreword

by Brigitte Strobels-Shaw

Integrity within prison systems is fundamental to the rule of law and the credibility of justice institutions. As closed environments, characterized by significant power imbalances and limited transparency, prisons remain particularly vulnerable to corruption. When corruption occurs, it undermines security, facilitates criminal activity, weakens rehabilitation efforts and erodes public trust. Most importantly, it threatens the dignity and rights of those deprived of liberty and the professionalism of prison personnel.

The United Nations Convention against Corruption (UNCAC) calls upon States parties to promote transparency, accountability and integrity across all public institutions, including prison systems. The United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules) provide universally agreed standards for humane and effective prison management. *Integrity Behind Bars: Guide on Corruption Risk Management in Prison Systems* supports Member States in translating both of these commitments into practice by offering practical, preventive and risk-based approaches to strengthening integrity in prisons.

This Guide provides concrete tools and good practices that prison administrations can directly apply. These include conducting corruption risk assessments to identify vulnerabilities in core functions; developing mitigation strategies to address those vulnerabilities, such as merit-based recruitment, vetting and staff rotation; establishing safe and confidential reporting mechanisms; and reinforcing oversight and accountability systems. It also highlights the value of leveraging technology and strengthening leadership to foster a culture of integrity. Together, these measures demonstrate that corruption risks can be systematically mitigated through structured and sustained action.

This publication also reflects the strength of cooperation and the United Nations Office on Drugs and Crime (UNODC) expresses its sincere gratitude to the co-producer, the Independent Commission Against Corruption (ICAC) of Hong Kong, China, and to the International Association of Anti-Corruption Authorities (IAACA) for its continued partnership and commitment to advancing integrity worldwide.

Corruption in prison systems is a global challenge, but it is one that can be addressed. It is my sincere hope that this Guide will serve as a valuable resource for Member States in strengthening prison integrity, protecting human rights and reinforcing public trust in justice institutions.

Brigitte Strobels-Shaw
Acting Director, Division for Treaty Affairs
United Nations Office on Drugs and Crime

Foreword

by Woo Ying-ming

Integrity behind bars is essential to justice, human dignity and public trust. Correctional systems, by their very nature, operate as closed environments with concentrated authority and limited external scrutiny. Without active safeguards, such settings become inherently vulnerable to corruption. Left unchecked, these risks erode institutional credibility, undermine fairness and cripple the very prospects of rehabilitation.

To confront this pressing challenge, the Independent Commission Against Corruption (ICAC) of Hong Kong, China and the United Nations Office on Drugs and Crime (UNODC), with the support of the International Association of Anti-Corruption Authorities, jointly developed *Integrity Behind Bars: Guide on Corruption Risk Management in Prison Systems*. This Guide offers a practical, field-tested toolkit designed to help prison and correctional authorities, anti-corruption agencies and other interested institutions identify corruption vulnerabilities, strengthen integrity frameworks and embed accountability into daily operations.

Building on previous UNODC publications, enriched by international experience, and informed by the frontline expertise of practitioners, this Guide presents a comprehensive range of measures that are adopted across jurisdictions to reduce vulnerabilities in custodial settings. These include corruption risk assessments, prevention reviews, professional training, procedural clarity and strengthened complaints channels. Equally important, the Guide recognizes that sustainable integrity requires attention to staff welfare, as underpaid or overburdened personnel are more vulnerable to corrupt inducements.

The Guide also shares the good practices of Hong Kong, China, among others, where the close partnership between the ICAC and the Correctional Services Department in preventing corruption and upholding integrity in the prison system has proven highly effective. There, clean prison management rests on the foundation of an independent anti-corruption agency, close institutional collaboration, proactive corruption prevention reviews, robust staff training and transparent public reporting mechanisms, which provide options for consideration of prison authorities in other jurisdictions.

We are honoured to present this Guide as a contribution to strengthening integrity across global justice systems. Developed in close collaboration with correctional experts, anti-corruption practitioners, academics and international partners, it reflects diverse legal and cultural realities while staying faithful to shared principles of justice, transparency and human rights.

It is our sincere hope that this Guide serves not only as a practical resource but as a catalyst for reform, and as an inspiration for all those committed to enhancing integrity behind bars.

Woo Ying-ming
Commissioner, Independent Commission
Against Corruption of Hong Kong, China
President, International Association of
Anti-Corruption Authorities

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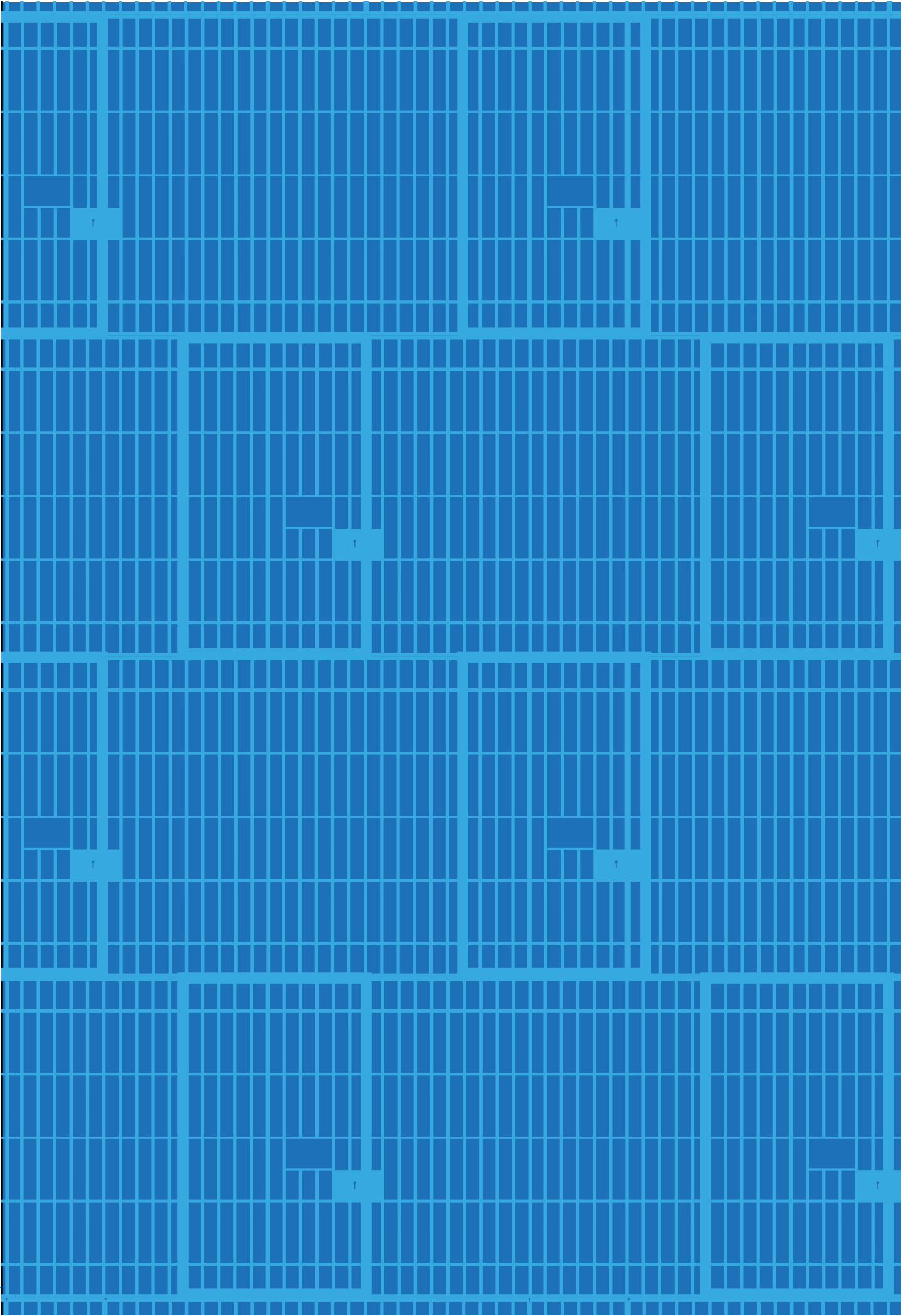
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International Association of Anti-Corruption Authorities

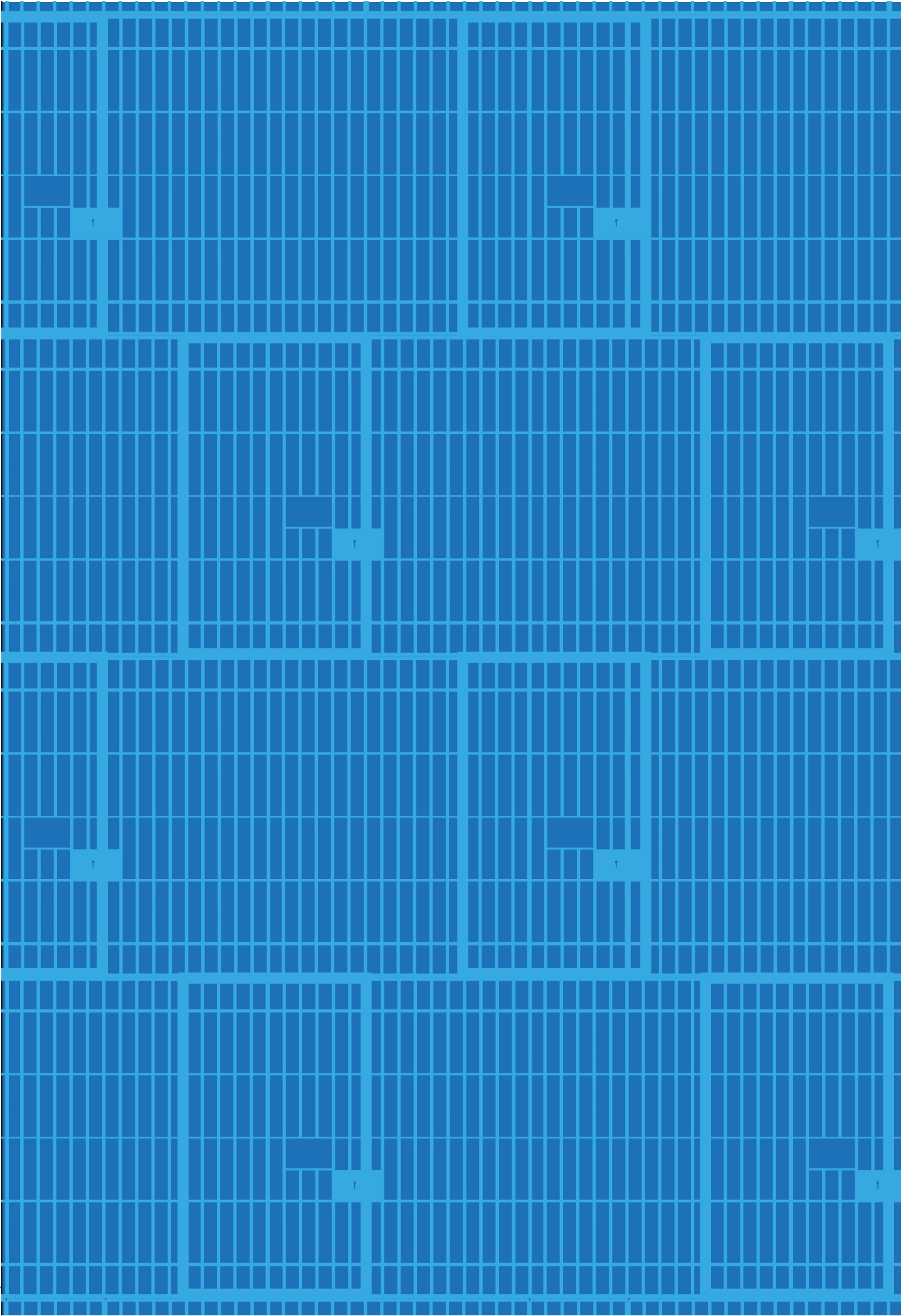


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Chapter 1

Introduction and purpose of the Guide

1.1 Scope and objectives of the Guide

The United Nations Office on Drugs and Crime (UNODC) supports Member States in meeting the requirements of the United Nations Convention against Corruption (UNCAC)¹ and managing their prison systems in alignment with the United Nations standards and norms related to prison management and the treatment of prisoners.²

In 2017, UNODC developed a *Handbook on Anti-Corruption Measures in Prisons*, which outlines the causes and manifestations of corruption in prisons and proposes a range of anti-corruption measures.³ In 2020, this was followed by the UNODC publication entitled *State of Integrity: A Guide on Conducting Corruption Risk Assessments in Public Organizations*, which offers general guidance on corruption risk management processes for public sector organizations.⁴

The current Guide builds on and complements those two publications. It is intended to be a practical “how-to toolkit” for implementing an effective corruption risk management approach in the specific context of prison systems. It provides practical guidance for prison administrations and managers to prevent, identify and counter corruption, and outlines approaches for corruption prevention strategies, frameworks, structures and processes. More specifically, the Guide proposes measures to implement the relevant articles and rules of UNCAC⁵ and the United Nations

¹United Nations (2003). *Convention against Corruption*, General Assembly resolution 58/4 of 31 October 2003.

²United Nations (2015). *United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules)* (A/RES/70/175); United Nations. (2011); *United Nations Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders (the Bangkok Rules)* (A/RES/65/229); *United Nations (2025). United Nations Model Strategies on Reducing Reoffending (the Kyoto Model Strategies)* (A/RES/88/226).

³United Nations Office on Drugs and Crime (UNODC) (2017). *Handbook on Anti-Corruption Measures in Prisons*.

⁴UNODC (2020). *State of Integrity—A Guide on Conducting Corruption Risk Assessments in Public Organizations*.

⁵Those include, among others, art.7 Public sector, art. 8 Codes of conduct for public officials, art.10 Public reporting, art.13 Participation of society, and art. 33 Protection of reporting persons.

Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules), aiming to strengthen integrity, accountability, transparency and oversight in prison settings.

The objective is not only to address corruption once it occurs, but to assist Member States in preventing, thereby protecting prisoners, prison staff and communities from its insidious consequences. This does not detract from the fact that prison management is one of the most demanding public functions and that many prison officials work with great professionalism, commitment and integrity to ensure safe, secure and humane custody.

This Guide addresses corruption in prison systems, defined as all authorized places of detention in the criminal justice process, including facilities holding individuals during pretrial detention or after conviction. Many of the principles and measures outlined are also applicable to other forms of detention, such as police custody during arrest and initial procedures, or immigration detention facilities where applicable.

The primary focus of this Guide is the prevention and countering of corruption. It also discusses other forms of abuse, misconduct and mismanagement, recognizing that these often overlap with corruption and may reinforce one another. Several of the measures proposed specifically target corruption risks, while others aim more broadly to strengthen accountability, transparency and oversight to prevent and deter all forms of abuse and misconduct.

The content of this Guide has been informed by the responses from States parties to UNCAC to a questionnaire distributed in August 2025. The questionnaire collected information on legal and institutional frameworks governing prison systems, as well as practical experiences, effective practices and lessons learned in preventing and managing corruption risks within them. The examples and policies contained in the 37⁶ submissions received in response to the questionnaire are referenced throughout the Guide and have been equally made available in the thematic compilation of the prevention-related information website.⁷

As the research for this Guide has shown, there remains a considerable gap in data collection and analysis on corruption in prison systems. Available case examples and documented anti-corruption measures specific to prison systems remain limited. It is hoped that this Guide will prompt more Member States to proactively address the challenge of corruption in prisons and contribute to the growing body of knowledge and experience in this field.

The specific objectives of this Guide are:

- To raise awareness among prison authorities, decision-makers and anti-corruption stakeholders of corruption risks in prison systems and their impact on public safety and trust in the criminal justice system.
- To support prison administrators and practitioners as well as other relevant stakeholders in understanding the benefits of a structured corruption risk management process and the steps required to identify and address risks.
- To assist policymakers in identifying and prioritizing areas where anti-corruption efforts are most needed.

⁶Botswana, Brazil, Bulgaria, Burundi, Chad, Chile, Colombia, Costa Rica, Côte d'Ivoire, Dominican Republic, Ecuador, France, Germany, Ghana, Guyana, Hungary, Ireland, Japan, Kingdom of Morocco, Lithuania, Madagascar, Malaysia, Mali, Malta, Myanmar, Republic of North Macedonia, Niger, Poland, Qatar, Romania, Singapore, Slovakia, Slovenia, Spain, Thailand, Uganda, and United Kingdom of Great Britain and Northern Ireland.

⁷See also: www.unodc.org/corruption/en/cosp/WGP/preventive-anti-corruption-bodies.html

- To provide examples of corruption risk mitigation strategies and tools for those responsible for designing and implementing them.
- To promote a dialogue on corruption risks within prison systems and encourage collaboration among stakeholders to address this persisting and evolving challenge.

Further, while the primary focus of this Guide is on prisons that hold adults, the outlined principles and measures should equally apply, as appropriate, in facilities where children or young persons are deprived of their liberty to protect minors from abuse, exploitation and neglect. Member States should ensure that all corruption prevention, oversight and complaints mechanisms are child-sensitive, accessible and fully aligned with the United Nations Convention on the Rights of the Child and the United Nations Rules for the Protection of Juveniles Deprived of their Liberty.⁸

The particular and often wide-ranging challenges of reforming prison systems in post-conflict settings or in contexts where systematic human rights violations have occurred or persist are beyond the scope of this Guide. In such situations, systems may have collapsed and institutional knowledge is lacking. Establishing or restoring prison systems grounded in order, constructive staff-prisoner relationships and respect for human rights – including efforts to address corruption – will require significant resources and external support. The overall considerations in this Guide remain equally relevant in such contexts.

The context of each prison system is unique. Accordingly, the advice contained in this Guide should be used as a starting point for developing tailored corruption risk assessments and mitigation plans.

1.2 International legal and policy framework

The United Nations Convention against Corruption (UNCAC) is the only legally binding anti-corruption instrument of global scope. It was adopted in October 2003 and is close to reaching universal application.⁹ The mandatory character of many of its provisions makes UNCAC a unique tool for developing a comprehensive response to a global problem. Its key provisions on the prevention of corruption address the entire public sector and therefore also include the prison system and prison management.

The *United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules)*, adopted by the General Assembly in December 2015, resulted from an extensive inter-governmental review process and represents a landmark harmonization of the original version of the Standard Minimum Rules (1957) with international law and good prison management practices. As such, the 122 Rules represent a universally recognized benchmark for prison management and the treatment of prisoners and are an essential reference and source of guidance for efforts to address corruption in prison systems.¹⁰

⁸United Nations General Assembly (1989). *Convention on the Rights of the Child* (A/RES/44/25). See also, United Nations General Assembly (1985). *United Nations Standard Minimum Rules for the Administration of Juvenile Justice (Beijing Rules)* (A/RES/40/33); United Nations General Assembly (1991). *United Nations Rules for the Protection of Juveniles Deprived of their Liberty (Havana Rules)* (A/RES/45/113).

⁹As of April 2026, the Convention has 192 States parties.

¹⁰United Nations (2015). *United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules)* (A/RES/70/175).

The *United Nations Rules for the Treatment of Women Prisoners and Non-custodial Measures for Women Offenders (Bangkok Rules)*,¹¹ adopted by the General Assembly in December 2010, address the specific needs and circumstances of women in detention. They emphasize non-discrimination, gender-sensitive management, equal access to services and safeguards against abuse or exploitation. The Bangkok Rules are also relevant to corruption prevention, as unequal treatment, coercion or extortion affecting women prisoners often intersect with broader integrity risks within prison systems.

Finally, the *United Nations Model Strategies on Reducing Reoffending (the Kyoto Model Strategies)*,¹² adopted by the General Assembly in December 2025, emphasizes the need to address corruption in prisons as part of efforts to create rehabilitative prison environments.

The Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT)¹³ establishes a monitoring system including regular visits by independent national and international bodies to places of detention. The work of National Preventive Mechanisms, as foreseen by OPCAT, contributes directly to transparency and accountability within prison systems, thereby reducing opportunities for corruption.

Beyond the applicable international legal framework, practical guidance on its implementation has been developed at international and regional levels by the Organization for Security and Co-operation in Europe (OSCE),¹⁴ the European Union¹⁵ and the Council of Europe.¹⁶

1.3 What is corruption?

There is no universal definition of corruption and national legal frameworks vary in how it is described. UNCAC recognizes that corruption is a continuously evolving phenomenon affected by various factors. It offers a list of universally agreed corruption offences¹⁷ and allows each Member State to go beyond the minimum standards expressed in the Convention. Chapter 2 of this Guide outlines examples of corruption that have been observed in prison systems by Member States.

For the purposes of this Guide, corruption is understood as instances where the action of a person in his or her capacity as a public official or a person entrusted with the performance of a public function, is influenced by private interest in gaining an undue advantage (tangible or intangible, pecuniary or non-pecuniary), personally or for another person or entity. Such action amounts to an abuse of power, office or function.¹⁸ It is also noted that prisoners and their proxies could equally engage in corruption with a view to achieving such influence.

¹¹United Nations (2011). *United Nations Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders (the Bangkok Rules)* (A/RES/65/229).

¹²United Nations (2025). *United Nations Model Strategies on Reducing Reoffending (the Kyoto Model Strategies)* (A/RES/88/226).

¹³OHCHR (2002). *Optional Protocol to the Convention Against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment* (A/RES/57/199).

¹⁴Organization for Security and Co-operation in Europe (2016). *Handbook on combating corruption*.

¹⁵Huss, O., Beke, M., Wynarski, J., & Slot, B. (2023). *Handbook of good practices in the fight against corruption*. European Union.

¹⁶Council of Europe (2025 Mar.). *24th General Activity Report of the Council of Europe's Group of States against Corruption (GRECO) Anti-Corruption Trends, Challenges and Good Practices in Europe & the United States of America*.

¹⁷United Nations (2004). *United Nations Convention against Corruption* (A/RES/58/4) (arts. 15–24).

¹⁸UNODC (2014). *Handbook on Anti-Corruption Measures in Prisons* (p. 3). Criminal Justice Handbook Series.

There are cases in which prisons are, to a significant degree, run by organized criminal groups or informal prisoner hierarchies led by powerful prisoners. This is different from the above understanding of corruption, which focuses on public officials and the performance of public functions. The same exclusion applies to bribery and similar conduct that may originate from prisoners or visitors, notwithstanding criminal liability for such acts as per national law, as applicable. It is important to recall, however, that such situations often occur with the active involvement, consent or acquiescence of prison staff.

Given that this Guide focuses specifically on corruption risks, it is important to distinguish between *corruption* and *corruption risk*. Corruption refers to an offence that has already taken place (see table 1), whereas corruption risks are weaknesses in a system that might present opportunities for corruption to occur. In other words, addressing corruption is a reactive measure, whereas addressing corruption risks is a proactive approach aimed at prevention.

This Guide is concerned primarily with identifying, assessing and mitigating corruption risks with a view to strengthening integrity, transparency and accountability in prison settings.

Table 1. Examples of corruption offences

CORRUPTION OFFENCE	EXAMPLES
Active/passive bribery	The promise, offering or giving or the solicitation or acceptance, to/by a national public official, a foreign public official or an official of a public international organization, directly or indirectly, of an undue advantage, in order to act or refrain from acting in matters relevant to official duties
Embezzlement	Theft, diversion or misappropriation of property, funds, securities or any other item of value entrusted to a public official in his or her official capacity
Bribery in the private sector	Active or passive bribery, directly or indirectly, to or by any person who directs or works in any capacity for a private sector entity, to act or refrain from acting in breach of his or her duties
Embezzlement of property in the private sector	Embezzlement by any person who directs or works in any capacity for a private sector entity
Abuse of functions	Performance of or failure to perform an act, in violation of the law, by a public official in order to obtain an undue advantage
Trading in influence	Abuse of a public official's real or supposed influence with an administration, public authority or State authority in order to gain an advantage or influence particular outcomes
Illicit enrichment	A significant increase in assets of a public official that cannot reasonably be explained as being the result of his or her lawful income
Money-laundering	The concealment of the origins of proceeds of crime, often by means of conversion or transfers involving foreign banks or legitimate businesses
Concealment	Hiding or continued retention of property, knowing that it has resulted from corruption

1.4 Structure of the Guide

Chapter 2 of this Guide highlights the inherent vulnerability of prison systems to corruption and outlines the main reasons for that vulnerability. It goes on to emphasize the importance of due diligence to prevent abuse and corruption that may be committed by prison staff, public officials or prisoners and points out that prison systems require a considerably higher level of due diligence than non-custodial environments. The negative impact that corruption can have on the management of prisons is explored along with the benefits of addressing corruption risks.

Preventing corruption through effective corruption risk management is explored in chapter 3. It sets out the organizational corruption risk management process and describes in detail each of the five steps in that process. Examples are provided of the types of corruption risks that may be identified, together with the approach that can be taken to categorize and evaluate those risks. The importance of risk management is discussed and a process is suggested for reviewing and assessing existing controls for identified corruption risks. The chapter ends by pointing out the need for corruption risk management strategies, policies and plans.

Chapter 4 considers the different types of strategies that can be adopted in relation to corruption risk management, that is, *process-based strategies* that foster a preventive approach aimed at implementing or strengthening controls; *people-based strategies* that foster a preventive approach by focusing on the people carrying out the process; and *enforcement-based strategies* that can deter corruption and address a corrupt act after it has occurred. The chapter also provides case studies of approaches that have been adopted by Member States.

The final chapter of the Guide sets out recommendations to Member States on actions that should be taken to manage corruption risks in prison settings.

Chapter 2

Corruption in prison systems – nature of the problem

2.1 Vulnerability of prison systems to corruption risks

Imprisonment creates a situation in which prisoners depend upon prison authorities for the fulfilment of almost all their day-to-day needs, including access to basic necessities, such as food and water. By depriving individuals of their liberty, the State automatically assumes a heightened duty of care to ensure that custody is enforced in a secure, safe, humane and dignified manner. This must include due diligence to prevent abuse and corruption that may be committed by prison staff, public officials and prisoners and requires a considerably higher level of due diligence than non-custodial environments.¹⁹

Specific inherent characteristics of prisons may increase exposure to corruption.²⁰ These characteristics can be gathered in four main groups: structural factors; governance and integrity system vulnerabilities; human resources and staff related risks; and prison population vulnerabilities.

2.1.1 Structural vulnerabilities

Closed environments. Prisons are relatively isolated from society and typically receive limited public attention. In addition and despite contrary provisions in the Nelson Mandela Rules,²¹ many countries lack effective monitoring and inspections of prison facilities. Only

¹⁹United Nations General Assembly (2006). *Extrajudicial, summary or arbitrary executions* (A/61/311), Report of the Special Rapporteur (paras. 51–52).

²⁰Penal Reform International; U4 Anti-Corruption Resource Centre (2024). *Corruption in prisons: A guide for detention monitors*. Bergen: U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute (U4 Guide 2024:1). See also, Center for the Advancement of Public Integrity (2016). *Prison corruption: the problem and some potential solutions*. Research Centers & Programs at Scholarship Archive, Columbia Law School.

²¹*Nelson Mandela Rules*, Rule 83 establishes a twofold system of internal and external inspections for prisons.

38 per cent of Member States that responded to the questionnaire reported oversight bodies at the individual prison level and 43 per cent at the prison sector level.²² Further, the work of external oversight bodies, such as Prison Inspectorates or National Preventive Mechanisms, may be hindered by resource constraints or limited access to information. These issues may be compounded by little or no involvement of other external actors, including civil society, in the delivery of services in prisons.

Imbalance of power. The pronounced power asymmetry between prison staff and prisoners generates a high-risk environment for corruption. Prisoners, operating in a context of dependency and vulnerability, may attempt to influence outcomes through illicit means to obtain access to basic rights, services or protection. Conversely, staff members who control access to these resources may exploit their authority for private gain, thereby normalizing corruption. Corruption risks may also be generated by high-risk prisoners, who may seek to bribe or coerce prison staff, as well as by prisoners who occupy influential positions within informal prison hierarchies.

Different prison categories. Prisons are not uniform institutions and the type of facility can have a significant impact on nature and scale of corruption risks. Acknowledging these differences is important to ensure that corruption risk management strategies are appropriately tailored. High-security prisons, which often house violent offenders or prisoners assessed to present a high escape or other risk, may face heightened risks linked to collusion with organized criminal groups, trafficking of contraband or manipulation of security systems. Low-security prisons are not exempt from corrupt practices, either, where respective risks may relate to programme participation, including outside work placements, the misuse of progressive regimes, temporary release or community partnerships. Where supervision is lighter, there can be increased opportunities for bribery or favouritism in granting privileges. Women's prisons and juvenile prisons might face different dynamics again, including the risk of sexual corruption in exchange for privileges.

Overcrowding. In roughly two thirds of the 184 countries worldwide with available data, prison systems operate at more than 100 per cent of their planned capacity. Alarming, more than one in four countries globally are operating at over 150 per cent of their intended national prison capacity.²³ Unsurprisingly, corruption risks multiply in such conditions. Overcrowding compromises adequate supervision, weakens internal safeguards and creates conditions in which informal or corrupt practices can flourish. This increases the likelihood that valuable intelligence about corruption and organized criminal activity goes undetected due to limited supervision.²⁴

Poor prison infrastructure. A significant portion of prisons globally suffer from ageing or deteriorating infrastructure that does not or no longer corresponds to the operational needs of prison management. These shortcomings adversely affect prisoners' physical well-being and constrain the capacity of prison staff to maintain order, supervise movement and detect corrupt practices. Inadequate maintenance and substandard designs can contribute to operational blind spots, weakened perimeter security and increased opportunities for the circulation of contraband and other prohibited items, thereby exacerbating risks of corruption and misconduct.

²²UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]

²³UNODC (2026). *Prison Matters 2026: Global prison population and trends: A focus on prison-community engagement*, pp 19–20.

²⁴For detailed guidance on how to address situations of prison overcrowding, see, UNODC (2013). *Handbook on Strategies to Reduce Overcrowding in Prisons*. Criminal Justice Handbook Series.

Dormitory and cell-based accommodation. The structure of prison accommodation can shape behaviours and pressures. In the absence of proper oversights and safeguards, dormitory-style housing may give rise to informal peer structures, extortion or other coercive arrangements in which dominant individuals or groups control access to resources, protection or privileges. Conversely, cell-based systems may heighten the power imbalance between staff and prisoners, with cell assignments or movements becoming items that staff can trade or use as leverage. Both models, under conditions of scarcity and deprivation, can create environments ripe for corrupt practices.

Insufficient technological infrastructure. Outdated or insufficient technological systems can weaken a prison's ability to prevent and detect corruption. Tools such as CCTV, audio-video monitoring, scanners and secure electronic file management systems play an important role in ensuring transparency, identifying misconduct, tracking unauthorized access and maintaining reliable audit trails.²⁵ When such systems are missing, poorly maintained or only partially implemented, it becomes easier for illicit activities to remain undetected and accountability becomes harder to enforce.²⁶

Privately run prisons. Where applicable, privately managed prisons introduce an additional layer of complexity due to the interplay between financial incentives, contractual obligations and operational realities. The pursuit of profits may lead to cost-cutting measures, understaffing or inadequate training, factors that weaken the overall integrity framework and can render staff more susceptible to corruption. At the same time, gaps in oversight or transparency may provide opportunities for manipulation of records, procurement irregularities or collusive arrangements between private operators and public authorities.

2.1.2 Governance and integrity system vulnerabilities

Lack of information gathering, sharing and documentation. Inconsistent or poorly coordinated information sharing can undermine the integrity and effectiveness of prison systems. When prison intelligence is fragmented, records are incomplete and cooperation with law enforcement, judicial bodies or central authorities is limited, critical indicators of corruption or organized criminal activity can be overlooked. Informal data collection without proper safeguards undermines oversight and can delay action in cases of misconduct.²⁷ Weak record-keeping and inter-agency coordination hinder investigations, reduce transparency and obscure emerging risks.²⁸

2.1.3 Human resources and staff related vulnerabilities

Poor human resources management policies. Prison administrations, managers and staff have a unique level of control and power over prisoners and their well-being. This creates increased risks of abuse of power and corruption and requires strong oversight. In many jurisdictions, insufficient attention is being paid to the proper recruitment, training and management

²⁵ UNODC (2017). *Handbook on Anti-Corruption Measures in Prisons* (p.76). Criminal Justice Handbook Series.

²⁶ Ibid., p. 68.

²⁷ Ibid., pp. 68–70.

²⁸ *Nelson Mandela Rules*, Rules 6–10 outline the requirements for a standardized prisoner file management system that ensures accurate, secure, and confidential record-keeping throughout imprisonment, supporting legal compliance, prisoner rights, and data-driven prison administration.

of prison staff.²⁹ This is also reflected in the results of the questionnaire to Member States, in which only 76 and 73 per cent reported competitive recruitment processes and vetting at the recruitment stage, respectively. While 69 per cent reported that they provided regular ethics training, only 38 per cent confirmed the use of integrity testing or continuous vetting.³⁰ If the disciplinary management system is weak or ineffective, it can undermine any deterrent effect and create the perception that wrongdoing is tolerated.

Inadequate salaries of prison staff. Low salaries of prison staff can contribute to dissatisfaction, potentially making it “easier” for prison staff to justify their involvement in corruption. Inadequate salaries and recognition of the work of prison staff can also contribute to the lack of appropriate candidates, leading to the appointment of candidates who are either not suitable or ill-equipped to carry out their day-to-day duties.³¹

Limited diversity within prison management. Limited diversity in prison administrations, including gender diversity, can increase corruption risks. For instance, even though women make up around 30 per cent of the prison workforce,³² they are significantly underrepresented in leadership roles in prison administrations. Diverse leadership contributes to more balanced decision-making.³³

2.1.4 Prison population vulnerabilities

Organized crime and prison subcultures. Organized criminal networks often extend their influence into prisons, creating parallel authority structures and illicit economies that erode integrity.³⁴ Through intimidation, bribery and coercion, these groups may corrupt staff, control access to goods and privileges and exploit prisoners and families to secure compliance with their demands. Such dynamics can blur the line between formal and informal power and heighten corruption risks. This is reflected in States’ questionnaire responses: 84 per cent indicated that specific categories of prisoners, particularly members of organized criminal groups or other prisoners assessed to be of high risk, pose heightened corruption risks within their prison systems.³⁵ Preventing organized crime infiltration requires coordinated intelligence sharing, staff vetting and, where necessary, rotation, protection measures for prison staff and families, and consistent oversight.³⁶

Prisoners with little to lose. Some prisoners may seek to exploit the weaknesses of the system, for example, by attempting to corrupt prison staff, as they may feel they have much to

²⁹ *Nelson Mandela Rules*, Rule 74(1) and *United Nations Convention against Corruption*, art. 7(1) call for the careful selection of every grade of prison staff in order to ensure integrity, humanity, professional capacity, and personal suitability.

³⁰ UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]

³¹ Ross, J.I. (2013). Deconstructing correctional officer deviance: Toward typologies of actions and controls. *Criminal Justice Review*, 38(1), 110–126.

³² Association for the Prevention of Torture (2024 Dec.). *Global report on women in prison: Analysis from National Preventive Mechanisms*.

³³ UNODC (2020). *The Time is Now: Addressing the Gender Dimensions of Corruption*.

³⁴ Penal Reform International; U4 Anti-Corruption Resource Centre (2024). *Corruption in prisons: A guide for detention monitors*. Bergen: U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute (U4 Guide 2024:1)

³⁵ UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]

³⁶ See, Penal Reform International (2024 Aug.). *Corruption in prisons: A guide for detention monitors*. U4 Anti-Corruption Resource Centre.

gain and little to lose, especially if facing a long-term sentence. Prisons house large numbers of individuals with criminal backgrounds, many of whom have been confined for long periods of time and they may have suffered or continue to suffer from deprivation that is inherent in situations of incarceration. When these individuals are housed in overcrowded or poorly designed and managed facilities, the conditions pose exceptionally challenging circumstances that affect the state of mind and behaviour of prisoners and prison staff. Indeed, the environment of prisons revolves around crime like no other institution.

Vulnerabilities within the prison population. Prisoners are not a homogeneous group and differ in their backgrounds, needs and vulnerabilities.³⁷ Prisoners with special needs, marginalized groups and those with limited skills may be more dependent on prison staff and services and therefore at greater risk of exploitation through corruption.³⁸ Where such dynamics are not adequately addressed, staff may collude with influential prisoners or overlook abuses in exchange for favours or illicit payments.³⁹

Pretrial detainees. Persons held on remand may be particularly vulnerable due to legal uncertainty and dependence on prison authorities, including for access to legal counsel.⁴⁰ The absence of a final judicial determination may create incentives for some prisoners to seek to influence their cases, through illicit interactions, while staff may solicit or accept undue payments for services or rights guaranteed under law.

While these factors do not themselves mean that corruption will occur, they may increase vulnerabilities to corrupt practice. For a more detailed discussion, see the UNODC *Handbook on Anti-Corruption Measures in Prisons*.⁴¹

2.2 Importance of addressing corruption risks in the prison system

Corruption is a significant threat to meeting the minimum standards embodied in the Nelson Mandela Rules. It undermines public trust in prison and criminal justice systems, as well as confidence in a government's ability to protect society and uphold prisoners' inalienable human rights. Corruption also places additional strain on already limited financial and human resources within prison systems while increasing incarceration. Importantly, it undermines the ability of prison services to effectively deliver on their mandate to ensure safe, secure and humane custody while advancing rehabilitation and social reintegration prospects.

Addressing corruption risks within the prison system is therefore essential. Efforts to combat corruption can have several direct benefits, including respect for prisoners' human rights; the

³⁷For example, in relation to their legal status, age and duration of sentence, as well as physical and mental health, literacy and numeracy, language, gender, culture, religion and ethnicity. See also the *Nelson Mandela Rules*. Rule 2(2) requires prison administrations to "take account of the individual needs of prisoners, in particular the most vulnerable categories in prison settings".

³⁸See, UNODC (2009). *Handbook on Prisoners with Special Needs* for details of categories of prisoners who may be at risk of being exploited as a result of corrupt activity. Also see, *Bangkok Rules*, for risks faced by women in prisons or detention facilities.

³⁹Council of Europe (2025 Apr. 25). *Informal Prisoner Hierarchy*. Prison Standard CPT/INF (2025)12. European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT).

⁴⁰UNODC (2017). *Handbook on Anti-Corruption Measures in Prisons*. Criminal Justice Handbook Series.

⁴¹See, chapter 1. UNODC (2017). *Handbook on Anti-Corruption Measures in Prisons*. Criminal Justice Handbook Series.

effective and accountable use of public resources; strengthened public trust in the prison system; disruption of criminal networks; improved rehabilitation outcomes; and lower rates of recidivism. Preventing corruption may also result in the removal of barriers to access prison services, thus reducing inequities among a particularly vulnerable and marginalized segment of society.⁴²

2.3 Manifestations of corruption in the prison system

Corruption in prisons can have far-reaching harmful consequences for prisoners, prison staff, the overall prison system and the general public. It can occur at the individual level or manifest more systemically across all levels of prison administration. The responses to the UNODC questionnaire developed to inform this Guide reflect these vulnerabilities in practice: 61 per cent of all respondents reported anti-corruption challenges at the individual prison level, 47 per cent at the prison headquarters level, 63 per cent at the prison sector level and 36 per cent at the level of the wider criminal justice system.⁴³ Corruption can take many different forms. Research indicates that some of the most common include:

- (a) **Abuse of authority over prisoners' rights and services.** Prison staff may demand bribes for access to legal resources and processes, early release or basic services, such as food, family visits, healthcare or favourable housing conditions.⁴⁴ Payments may also be required to “prevent” torture or other forms of ill-treatment or manifest in the context of rehabilitation programmes and prison labour. Sexual corruption by prison staff (or them receiving bribes to tolerate or facilitate sexual corruption among prisoners) is another and severe abuse of authority and human rights violation.
- (b) **Financial and procurement-related corruption.** Procurement processes may be manipulated for personal gain, from everyday supplies to large-scale contracts, resulting in financial losses, substandard products and poor services. In the responses to the UNODC questionnaire, 31 per cent of respondents indicated procurement-related integrity issues within their prison systems, coupled with challenges concerning embezzlement or the misuse of resources by prison reported by 49 per cent.⁴⁵ This can significantly affect prison infrastructure and services and can consequently undermine prison conditions, safety and security.
- (c) **Human resources and institutional integrity violations.** Corruption may involve misuse of public property or biased recruitment and promotion practices

⁴²Blanco, E. (2021). Creating rehabilitative prisons environments: Anti-corruption policies. In *Workshop 2 Report: Reducing reoffending: Identifying risks and developing solutions* (pp. 61–73). United Nations Fourteenth United Nations Congress on Crime Prevention and Criminal Justice (Kyoto, Japan. 2021 Mar. 7–12). United Nations Asia and Far East Institute for the Prevention of Crime and Treatment of Offenders (UNAFEI).

⁴³UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]

⁴⁴See, for example, Robbins, S. (2019 Mar. 13). *Systemic Colombia prison corruption reaches top officials*. Caymen iNews; Also see, Rajendran, S. (2017 Aug. 8, updated 2022 Aug. 25). *Multipronged strategy required to tackle corruption in prisons*. The Hindu Centre for Polics and Public Policy. [Newsletters online.]

⁴⁵UNODC (2025). Questionnaire: Preventing corruption in prisons through corruption risk management. [37 Member State submissions.]

driven by favouritism or bribery. Of the States that responded to the questionnaire, 33 per cent reported nepotism in recruitment or promotions.⁴⁶

(d) Information and data manipulation. Staff may alter prisoner records, suppress evidence (e.g., CCTV) or unlawfully share sensitive information for personal gain.

(e) Security breaches and criminal facilitation. Corruption can lead to escapes (e.g., by smuggling tools, leaving doors unlocked, providing access to keys and ignoring alarm triggers⁴⁷), neglect of duties or smuggling of contraband (e.g., drugs or mobile phones).⁴⁸ In some cases, staff can collaborate with criminal operations inside and outside the prison or enable prisoner exploitation (e.g., knowingly allowing prisoners to extort others for protection or services, often sharing the illicit proceeds), severely undermining safety and institutional integrity. Such risks are particularly evident in scam centre operations, where fraud schemes may continue to be coordinated from within prisons with the assistance or acquiescence of corrupt prison officials.



UNITED KINGDOM: SMUGGLING CONTRABAND INTO PRISON

In 2023, a prison officer in England was convicted following a multi-year police investigation (Operation Amalfi) into the smuggling of prohibited items into the facility. The officer admitted to trafficking drugs, mobile phones, SIM cards and other restricted items, often concealed in everyday packaging such as cereal boxes to avoid detection. Investigators uncovered that family members of specific prisoners had transferred funds into the officer's personal bank account in exchange for smuggling contraband, which was later sold within the prison wings under his supervision. The investigation, launched in 2018 after repeated discoveries of illicit items, eventually exposed a broader network involving several prisoners and outside collaborators. In total, nine individuals, including the officer, were prosecuted and received penal sentences ranging from six months to four years. Authorities described the officer as a central figure in the smuggling operation, noting that his actions had seriously compromised prison safety, sustained illegal prison economies, strengthened criminal networks and disrupted the rehabilitation of prisoners.

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

⁴⁶ Ibid.

⁴⁷ Pittaro, M. (2022 May 11). Prison corruption: A glimpse into manipulation tactics. *Psychology Today* [Blog].

⁴⁸ See, for example, Taylor-McCune, K. (2020). *Correctional officers' perspectives on cellphone contraband introduction by fellow officers* [PhD Dissertation, Walden University]; Loureiro-Revilla, R. (2024 Dec. 20). *Corruption as a limit to state capacity: Mobile phones in Peruvian prisons*. U4 Anti-Corruption Resource Centre. Chr. Michelsen Institute (U4 Brief 2024:7).



FRANCE: ORGANIZED SMUGGLING NETWORK INVOLVING PRISON AND CIVILIAN STAFF

A 2021 judgment by the Avignon Court of Justice exposed an extensive criminal network involving prison staff, private workshop personnel, prisoners and external accomplices. The investigation revealed various smuggling methods, including the throwing of packages over prison walls, the handover of prohibited items during visits and staff intentionally bringing in drugs and mobile phones. The organized criminal networks exploited institutional weaknesses, including gaps in oversight and staff vulnerabilities, to facilitate the smuggling of illicit items into correctional facilities. A total of 22 individuals were convicted, among them prison officers and contracted civilian employees. A workshop foreman was sentenced to 24 months in prison, with 12 months suspension, for offences related to corruption and drug trafficking.

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

HUNGARY: PREVENTING DUTY FAILURES THROUGH TARGETED INSPECTIONS

The National Protective Service, acting on covert human intelligence, identified a unit supervisor at a high-security prison who intended to smuggle prohibited items and narcotics to prisoners during a scheduled holiday duty shift. Upon the supervisor's arrival, the duty commander conducted an inspection of their belongings and clothing. The search led to the seizure of several hundred tablets of unidentified substances, paper sheets suspected of being coated with narcotics, tubes of unknown liquids, multiple SIM cards and compact mobile phones. The supervisor's official work phone contained communications with prisoners that further substantiated the allegations. Criminal proceedings were initiated and subsequent searches of the supervisor's locker, vehicle and residence uncovered additional miniature mobile phones suspected of use in smuggling. Follow-up inspections of the prisoners' cells led to the discovery of more prohibited items, including mobile phones, SIM cards, USB drives, tablets and an unidentified white powder.

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



LITHUANIA: ABUSE OF OFFICE AND DESTRUCTION OF EVIDENCE

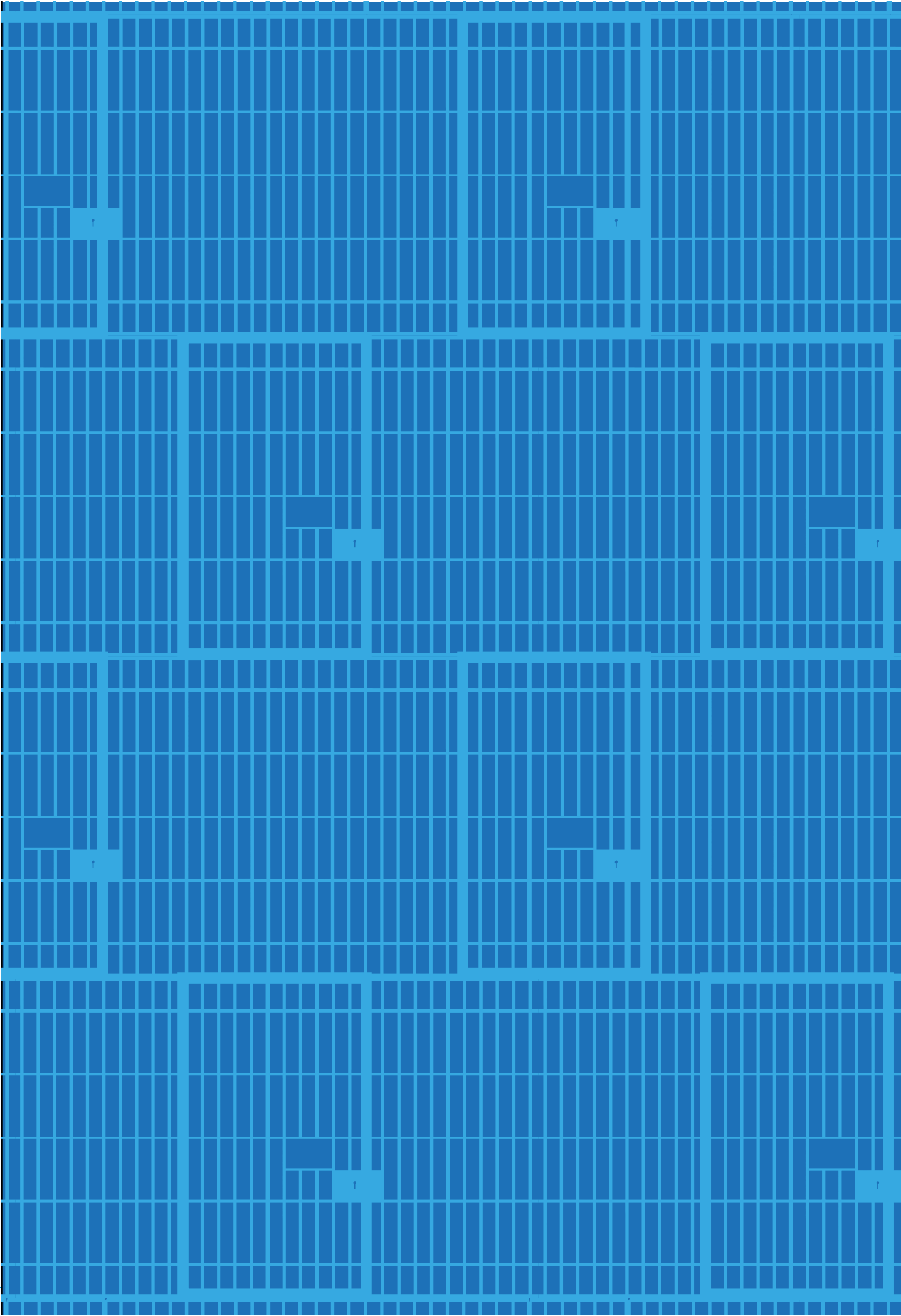
Lithuanian prison officers intercepted a package containing psychoactive substances being passed between prisoners. Although the contraband was seized, a senior prison officer instructed subordinates not to document the incident and later destroyed the evidence by flushing it down the toilet. The court found that the officer had deliberately concealed a serious offence, violated official reporting procedures and compromised the integrity of the prison administration. He was convicted of abuse of office, fined €8,500 and prohibited from holding a civil service position for four years.

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

SINGAPORE: MISUSE OF SENSITIVE PRISONERS' INFORMATION

In 2022, a prison officer in Singapore was convicted for unauthorized access to the secure prison database PORTS II and for disclosing confidential information to a disruptive prisoner in an attempt to prevent conflict. The officer repeatedly accessed prisoner's location data without proper authorization and shared the information upon request with another prisoner. Following an internal inquiry, the matter was referred to the Corrupt Practices Investigation Bureau. The officer received a 10-week custodial sentence and was dismissed from service.

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



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

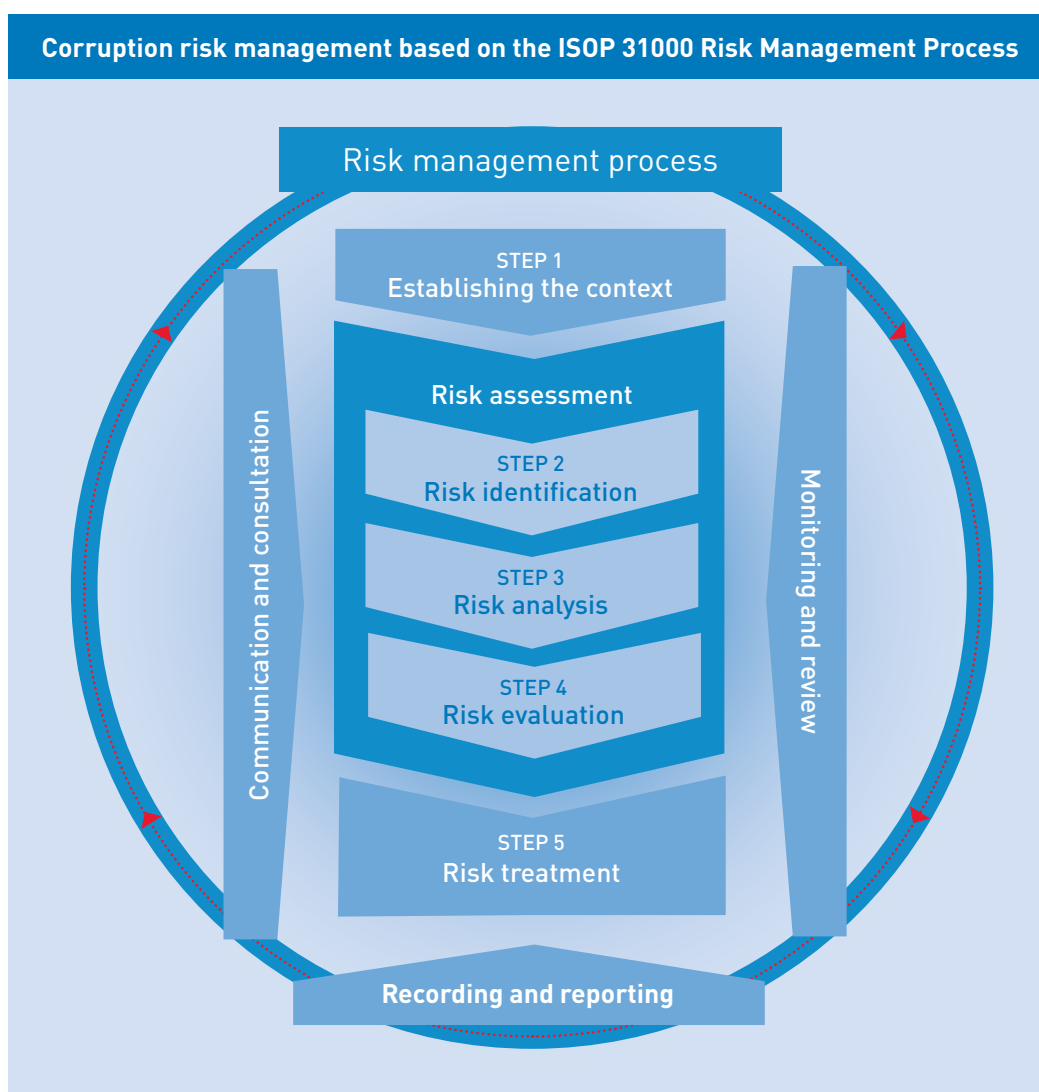
⁴⁹ The methodology used is based on the International Standards Organization (ISO) Risk Management Guidelines (ISO 31000:2018).

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).

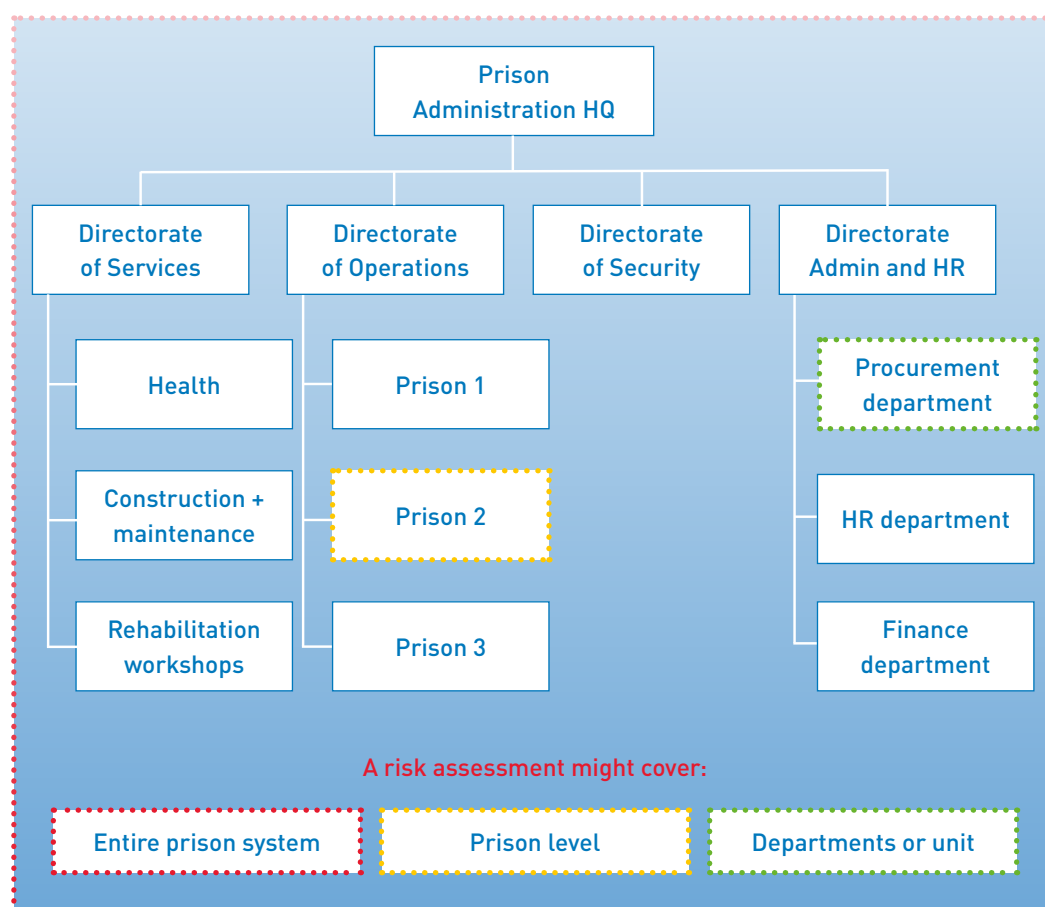
Figure 1. Corruption risk management process



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

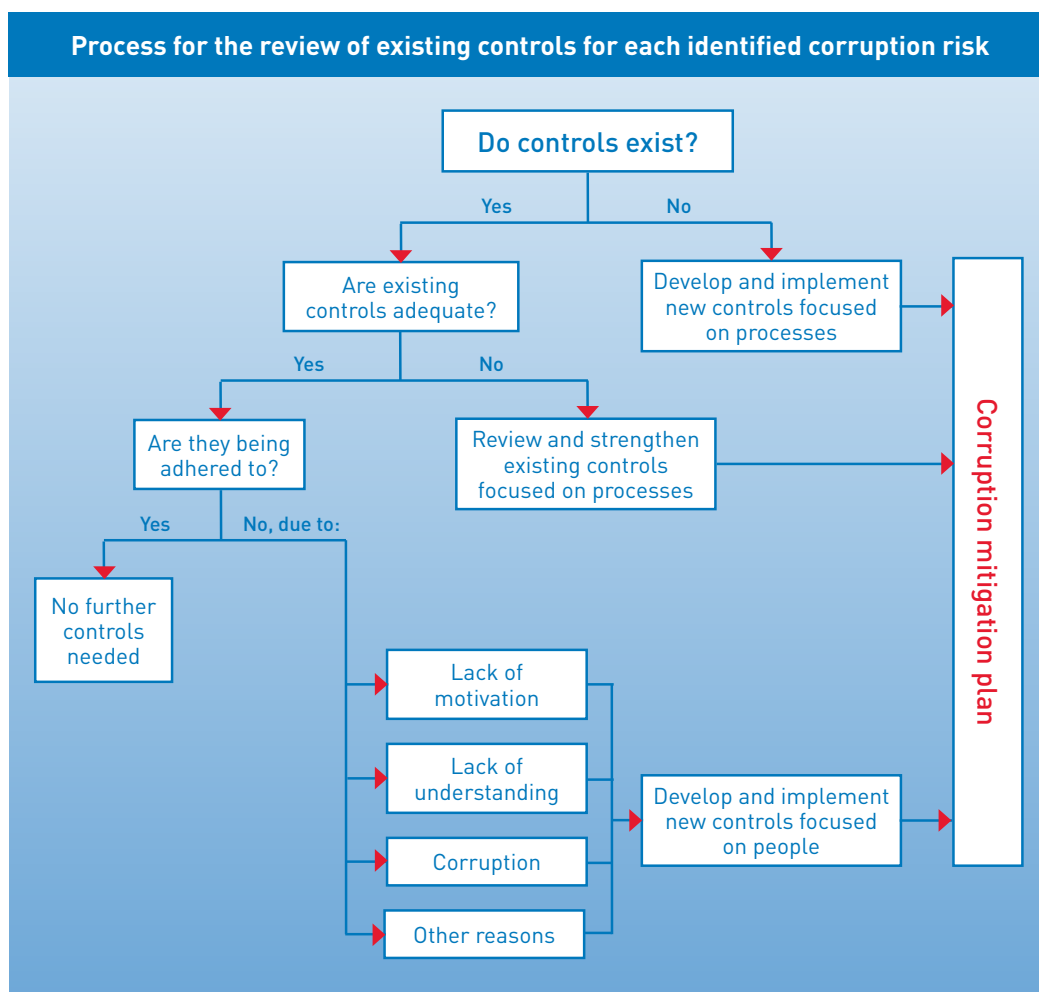
The next stage aims at addressing the prioritized corruption risks by creating and implementing tailored corruption risk mitigation strategies. These strategies, when put together, will form the prison system's corruption risk mitigation plan.

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.

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.

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

⁶⁸UNODC (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.

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

⁷¹Closed 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.

⁷⁴UNCAC, arts. 32 and 33.

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

⁷⁶UNODC (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). Detering 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.

⁹⁵See, 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.

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

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

⁹⁸See, 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

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

¹⁰⁷ See, 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.

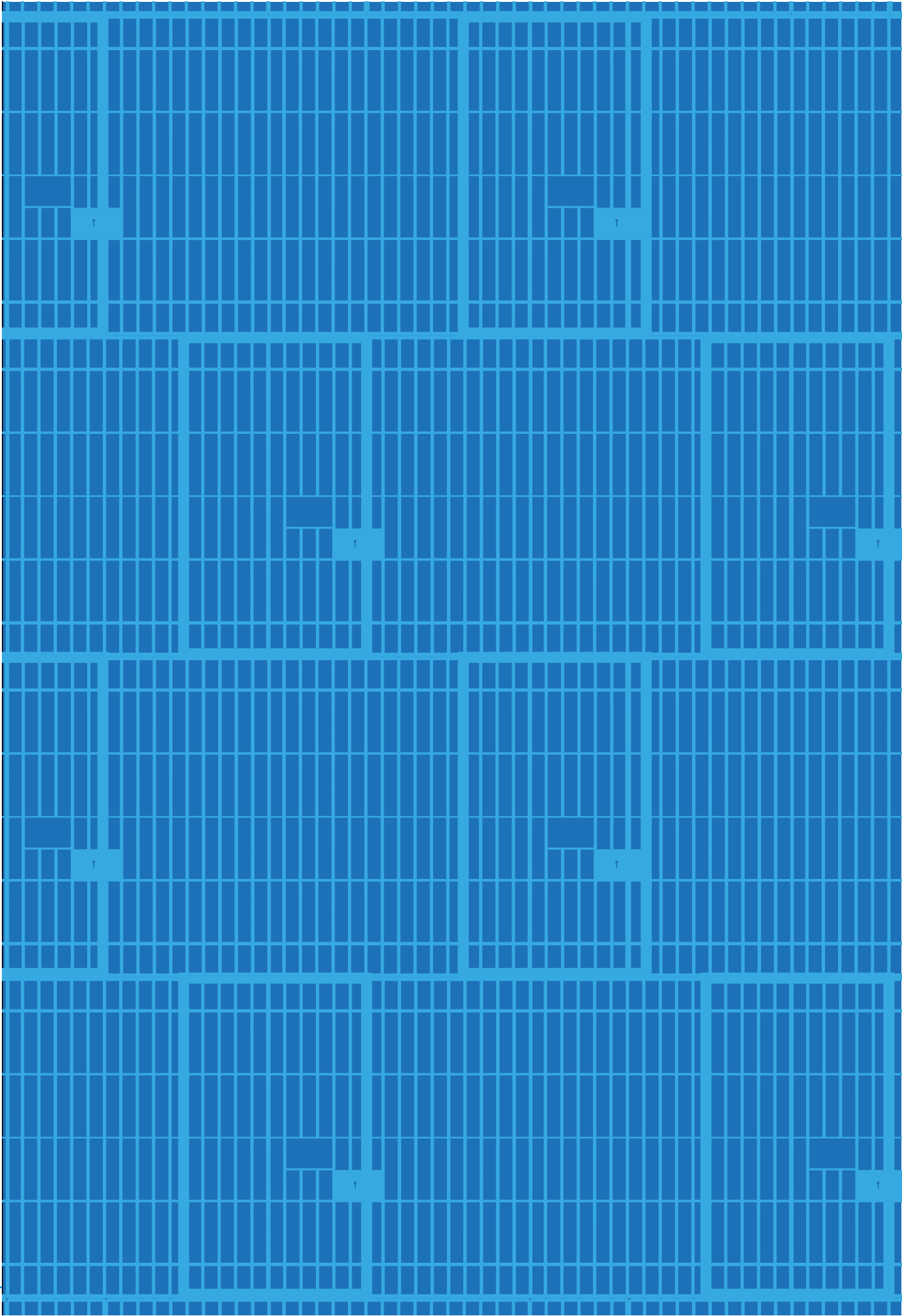


DOMINICAN REPUBLIC: PRISON GUARD PROSECUTED FOR ATTEMPTED DRUG SMUGGLING

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.



Chapter 5

Conclusions

Prison systems and the unique prison environment are particularly vulnerable to corruption due to a combination of structural vulnerabilities, prevailing governance and integrity deficiencies, human resources challenges and pressures associated with the profile of prison populations. Without dedicated action, these factors create conditions in which corrupt practices can emerge and flourish.

Unlike many other public institutions, prisons primarily operate as closed environments, where external oversight is often limited and daily interactions mostly occur outside public scrutiny. Within this setting, a significant imbalance of power exists between prison staff and prisoners, creating opportunities for corruption, especially where anti-corruption safeguards and accountability mechanisms are weak and poorly enforced.

These risks are further compounded by institutional pressures affecting prison systems. In many jurisdictions, prisons face chronic overcrowding, inadequate human resource management policies, limited diversity among prison management staff and generally limited resources. Managing large and complex prison populations under such conditions places a strain on staff and administrative systems, weakening internal controls and increasing the likelihood that corrupt practices will occur and persist within the prison sector.

If left unaddressed, corruption in prisons has a severe negative impact on the integrity and effectiveness of prison systems, thereby eroding public trust in the criminal justice system as a whole and undermining compliance with key international standards and norms governing prison management and the treatment of prisoners, including the Nelson Mandela Rules.

Preventing and mitigating corruption in prisons requires more than isolated measures, however; it relies on sustained commitment, clear prioritization and coordinated action across all levels of governance in the form of a comprehensive, multi-level approach. Doing so is key to ensure continued furtherance of their overall mission to ensure the safe, secure and humane custody of prisoners while advancing their rehabilitation and social reintegration prospects.

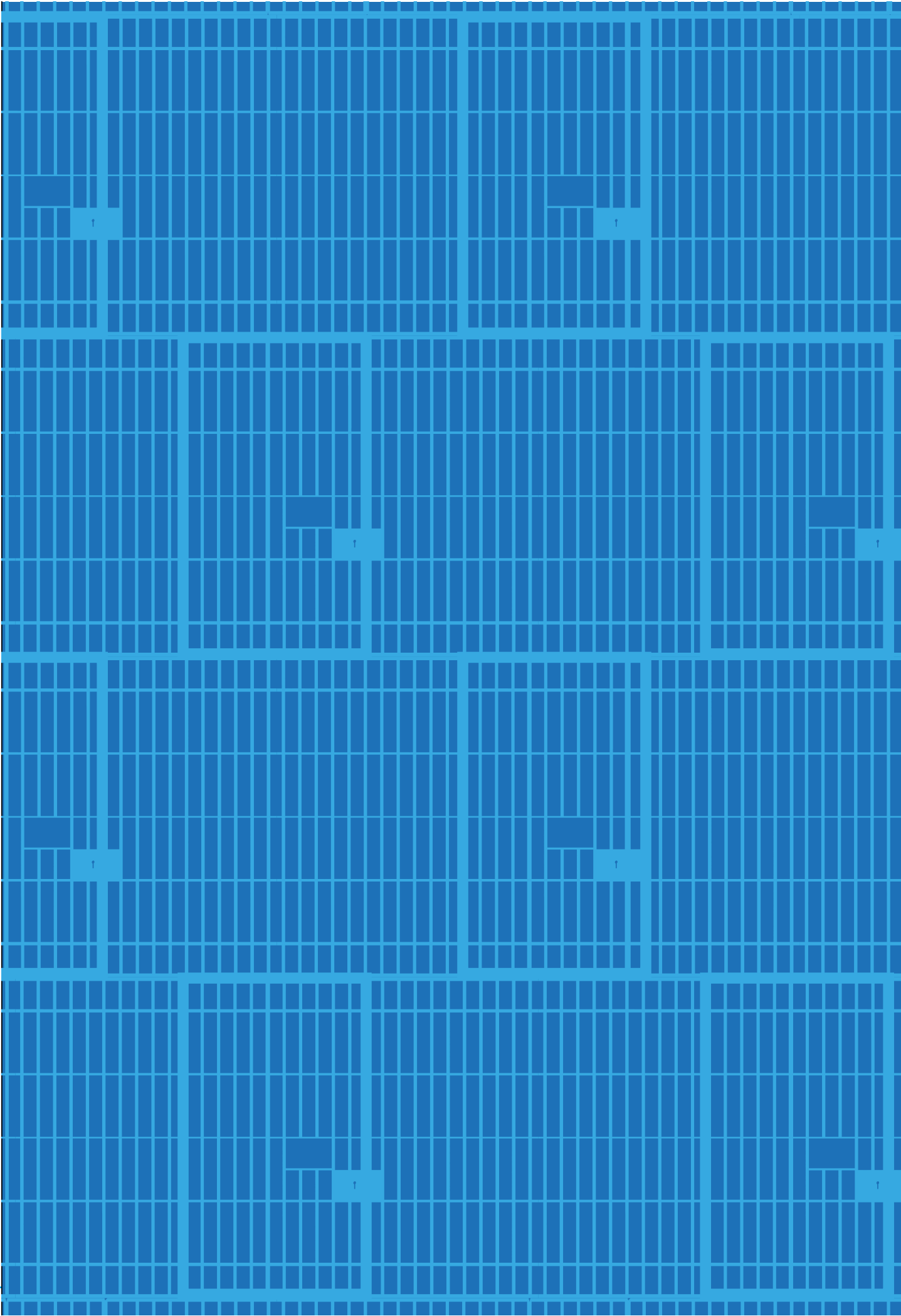
A critical entry point is a systematic understanding of where and how corruption risks arise. By identifying high-risk areas and points of vulnerability, prison authorities can better target and prioritize interventions, allocate resources more effectively and integrate corruption risk management into core prison governance and oversight processes.

Strategically, efforts should focus on four mutually reinforcing priorities:

- **Strengthening institutional and policy frameworks** ensures that corruption risk management is embedded within broader prison reform efforts and aligned with transparency and accountability objectives.
- **Enhancing administrative systems and transparency**—particularly in procurement, human resources management and service delivery—helps reduce discretion, close procedural gaps and limit opportunities for abuse.
- **Promoting professional integrity and ethical leadership** is essential to shaping organizational culture, reinforcing accountability and ensuring that staff are equipped, supported and incentivized to act with integrity.
- **Finally, robust detection, investigation and enforcement mechanisms** are necessary to ensure that corrupt practices are identified, addressed and deterred through consistent and coherent action.

While no system can eliminate corruption entirely, proactive corruption risk management provides a practical and structured approach for systematically identifying, assessing and addressing vulnerabilities. By doing so, it reduces both the opportunities for and the impact of corruption and strengthens the overall resilience of prison systems.

Annexes



Annex 1

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

Introduction

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

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

Legal and policy frameworks

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

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

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

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

Institutional structures and coordination

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

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

Risk identification and assessment mechanisms

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

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

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

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

Preventive measures and integrity safeguards

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

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

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

Reporting, enforcement and accountability

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

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

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

Promising practices and lessons learned

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

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

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

Challenges and technical assistance needs

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

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

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

Conclusion

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

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

Annex 2

Corruption-related practical tools and templates from Member States

Template 1: Corruption risk identification

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

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

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

Template 2: Corruption risk impact analysis

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

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

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

A single risk may fall under more than one category.

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

Template 3: Corruption risk prioritization

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

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

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

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

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

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

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

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

Template 4: Cause identification

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

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

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

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

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

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

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

Template 5: Mitigation plan

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

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

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

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

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

Examples:

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

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

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

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

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

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

Annex 3

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

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

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

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

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

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

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

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

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

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