CHALLENGES TO THE DEPARTMENT OF PRISONS, SRI LANKA, AND INITIATIVES TO OVERCOME THE CHALLENGES

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I. INTRODUCTION

The Department of Prisons in Sri Lanka represents a vital component of the criminal justice system in the country and is moving towards its vision of "Social reintegration of inmates as good citizens through rehabilitation" and performing the tasks with the mission of "Making a fine relationship between prison officers and inmates in order to achieve the main objectives of custody, care, and corrections and thereby to improve job satisfaction of the officers, regulate the welfare of the inmates thereby [utilizing] the productivity of their labour for benefit of the country."

The Department of Prisons is mandated to detain the prisoners under custody, provide them care and rehabilitate them through different mechanisms. The Department is headed by the Commissioner General of Prisons who is responsible for the entire functioning of the prison system in the country and five Commissioners, the Director (Engineering), the Director (Planning), and the Chief Financial Officer are under him, who are responsible for different divisions such as Human Resources, Prisoners Management, Logistic Management, Prison Industries, Rehabilitation of Prisoners, and Financial Management and Planning. Further, the prison institutions in the country are headed by Senior Superintendents of Prisons or Superintendents of Prisons or Assistant Superintendents of Prisons, and they are directly responsible for the Commissioner General of Prisons. The Department of Prisons is mainly governed by several laws and regulations including the Prison Ordinance of Sri Lanka of 1877, Statutory Legislation under the Prison Ordinance, and Departmental Standing Orders. In addition to that, the Department consists of 4 Closed Prisons which are specially designated for convicted prisoners, 18 Remand Prisons which particularly facilitate un-convicted prisoners, 12 Work Camps without walls or security fences which have been designated for agricultural therapies for short-term inmates, 1 Training School for Youthful Offenders where general education is provided to the young offenders between 16 to 22 years of age by the government teachers, 2 Correctional Centers for Youthful Offenders where youthful offenders between 18 to 22 years of age are detained and rehabilitated. In addition to that, there are 23 prison lock-ups where the inmates are temporarily detained.³ The approved cadre of officers is 7,872 consisting of 85 designations or positions.⁴ These officers are recruited through competitive examinations, interviews and physical fitness tests.

The Department of Prisons has been facing several pressing issues. Overcrowding in prisons, higher numbers of un-convicted prisoners, drug offenders in prisons, shortage of human resources, lack of modern technologies and old prison infrastructures are the main issues. These issues have become a big challenge in upholding prisoners' rights, which are guaranteed by domestic and different international standards such as the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the Convention Against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment (CAT), the Nelson Mandela Rules, the Bangkok Rules, the Beijing Rules and the Basic Principles for the Treatment of Prisoners. However, the Department of Prisons Sri Lanka has been making efforts to manage the above issues to protect and promote human rights and better life within prisons. Accordingly, this paper discusses the initiatives of the Department of Prisons Sri Lanka to resolve the pressing issues.

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¹ Department of Prisons, http://prisons.gov.lk/web/en/about-us-en/ Accessed 26 Dec. 2023.

² Ibid.

³ Prison statistics of Sri Lanka (2023), 42.

⁴ Department of Prisons, "Performance Report" (2022) http://prisons.gov.lk/web/wp-content/uploads/ 2023/08/performance-report-2022 EN.pdf > Accessed 28 January 2024.

II. PRESSING ISSUES AND INITIATIVES TO OVERCOME THEM

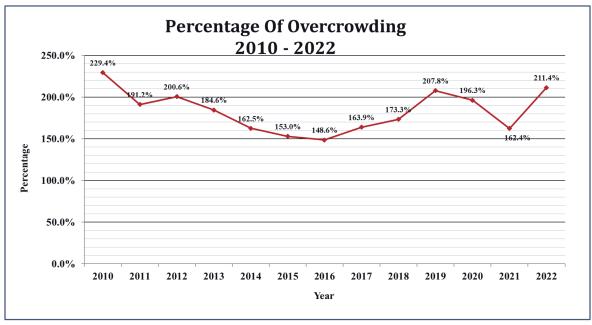
A. Overcrowding

1. Overview of the Issue

Overcrowding in prisons in Sri Lanka has been the biggest pressing issue which has created several other problems. Accordingly, as of 30 December 2023, the overcrowding percentage was 292% in general. However, it is observed that some of the prisons, particularly the urban prisons, are overcrowded by about 350%. This overcrowding issue has directly and indirectly affected the smooth functioning of prisons as well as the proper implementation of international standards in terms of prisoners. Accordingly, the overcrowding in prisons negatively affects prisoner file management, separation of categories, accommodation, personal hygiene, clothing and bedding, food, exercise and sport, health-care services, restrictions, discipline, and sanctions, searches of prisoners and cells, information to and complaints by prisoners, contact with the outside world, retention of prisoners' property, removal of prisoners, internal and external inspections, education and recreational activities — which means the overcrowding is a huge threat for the promotion and protection of the Human Rights and Quality Life within prisons. Accordingly, the below graph shows the trend of overcrowding in prisons in Sri Lanka from 2010 to 2022.

In addition, the ICRC recommendations with regard to required space for accommodation (5.4 m² single cell and 3.4 m² shared cell), the minimum requirement of the toilet (1:25), and the minimum requirement of the shower (1:50)⁶ and other minimum requirements cannot be fulfilled in overcrowded prison conditions.

Sri Lanka has been focusing on prison reforms to promote and protect human rights within prisons. Accordingly, a five-year plan has been developed incorporating the expected reforms. This plan consists of nine reform areas: Dealing with prison overcrowding, Prison Management Reforms, Prison Officers Training, Amendment of the Prisons Ordinance, Upgrading Security Measures in Prisons, Improving Prison Health Care, Offender Rehabilitation and Effective use of Labor Force, Reforming Women's Prisons and Training Centers for youthful Offenders and Implementation of e-Prison Concepts. Accordingly, in this five-year plan, dealing with prison overcrowding has been recognized as the first reform area. In addition to this five-year



(Source - Prisons Statistics VOL 42 - Year 2023)

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⁵ Statistics of Department of Prisons, "Morning Unlock" (30 Dec. 2023).

⁶ ICRC, "Water, Sanitation, Hygiene and Habitat in Prisons" (2013) https://www.icrc.org/en/doc/assets/files/ other/icrc-002-0823.pdf> Accessed 26 January 2024.

⁷ Department of Prisons, "Prison Reforms" (2020) http://prisons.gov.lk/web/wp-content/uploads/2020/10/Prison-reform-implementation-plan-2021-2025.pdf Accessed 27 January 2024.

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plan, the Department has developed a comprehensive plan that has recognized short-term, mid-term and long-term solutions to resolve the overcrowding issue in prisons.⁸ As per the above plans, the following initiatives have already been implemented and some of the initiatives are already in process.

2. Initiatives to Overcome the Issue

(a) Urban Prisons Relocation Project

It is observed that the overcrowding in urban prisons is much higher than the rural prisons as urban prisons have been established in limited spaces and there are no adequate spaces for further extension of prison facilities. In addition to that most of the overcrowded urban prisons are very old and infrastructure facilities in such prisons are not adequate to cater to the prison population in those prisons. Accordingly, Sri Lanka has been in the process of shifting or relocating urban prisons to places where enough space is available. Some of the urban prisons have already been shifted and authorities are always concerned about the international standards when establishing such new prisons. Accordingly, the Tangalle Prison, which had limited space for about 100 people, was shifted to a new prison complex at the Agunakolapalassa area with required facilities for about 1,200 inmates. In addition, old Jaffna prison was also shifted to a new prison complex with more facilities and space. Further, Bogambara prison, which had been established during the colonial period and was located in the middle of Kandy city, was shifted to a new place with more facilities and new infrastructure. The new prison complex has facilitated a better life compared with the previous old prisons.

The above three prisons have already been relocated and inmates have been detained. In addition to the above prisons, the Department of Prisons in Sri Lanka is in the process of relocating the Colombo prison complex. This complex consists of three major prisons, prison headquarters, the training school for officers, prison hospital, female prisoners' section, and officers' quarters. This complex is on about fifty acres of land and facilitates one-third of the prison population and prison officers of the country. Further, the overcrowding in these prisons is significantly higher as the complex is very old and has insufficient space for further development. Accordingly, the Department of Prisons together with the other authorized government agencies has been planning to shift this complex away from Colombo city to 200 acres of land. The design of the new prison complex has already been finalized in accordance with the domestic and international standards. This new complex consists of four prisons, the officers' training school, the prison intelligence unit, the prison hospital, and officers' accommodation. Further, this will facilitate 10,000 inmates with the required facilities.

(b) Construction of Pre-fabricated Buildings and Permanent Buildings

This is also one of the initiatives of the Department of Prisons to reduce overcrowding. Under this project, permanent and pre-fabricated buildings are constructed in prison institutions where there is enough space to build such buildings. Accordingly, the permanent buildings in one prison and pre-fabricated buildings in four prison institutions have already been constructed.¹¹

(c) Parole Systems

This is another main initiative in Sri Lanka to reduce prison overcrowding under which several initiatives are implemented. Accordingly, Sri Lanka has been practicing amnesties on nationally important and celebrated days like Independence Day, New Year's Day, Christmas Day, Wesak Poya Day etc. As per the Department Statistics in 2022, 1,333 inmates have been released on general amnesties. ¹² In addition to general amnesties, there are mechanisms to release inmates on special pardons such as on medical grounds, and review processes of appointed special committees. Further, releasing inmates on remission is a special mechanism in Sri Lanka, through which the inmates are granted marks for their good behaviour and labour during the day. Considering the total marks obtained by the inmate, he is granted a remission which is about

⁸ Department of Prisons, "Prison Reforms" (2020) < http://prisons.gov.lk/web/wp-content/uploads/2021/11/prison-overcrowding-overcome-plan.pdf > Accessed 27 January 2024.

⁹ Department of Prisons, "Trails of Renaissance" (2022) < http://prisons.gov.lk/web/wp-content/uploads/ 2022/10/trails-of-renaissance-english.pdf > Accessed 27 January 2024.

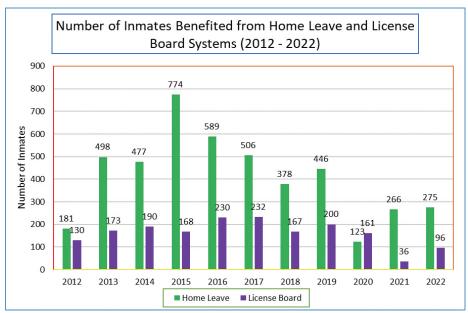
Department of Prisons, "Performance Report" (2022) < http://prisons.gov.lk/web/wp-content/uploads/2023/08/performance-report-2022_EN.pdf > Accessed 29 January 2024.

¹² Prison statistics of Sri Lanka (2023), 42.

one-third of the inmate's sentence. As per Department Statistics in 2022, 23,789 inmates have been released under this mechanism.¹³ This remission is granted to the convicted inmates, and they are released before the expiration of the judicial sentence.

Another important, parole mechanism is the home leave mechanism. Under this mechanism, eligible inmates are granted leave to visit his/her family for a specific period. For the first time, the eligible inmates are granted seven days' leave under which they can go to their family and be with them on given conditions and return to the prison on a given date and time. If the prisoner behaves in a good manner during this period, the inmate becomes eligible for ten days leave for the second time, fourteen days for the third time, and subsequent opportunities that come after every six months. Accordingly, as per the Department Statistics in 2022, 275 inmates have been eligible for this benefit.¹⁴

In addition to the home leave system, another important parole system in Sri Lanka is the License Board mechanism, which is a system for releasing inmates on conditions before the expiration of their sentence. There is a formally appointed committee to consider the eligibility of the inmate to be released under this mechanism. This committee, after reviewing the eligibility criteria, makes recommendations to release the inmate on conditions. After release, the inmate has to fulfil the conditions until the expiration of the sentence. Accordingly, the following graph shows the number of inmates who benefited from the Home Leave and License Board mechanisms over the recent years.



(Source - Prison Statistics in Sri Lanka)

(d) Alternatives to Imprisonment

One of the most important strategies to reduce prison overcrowding is the implementation of non-custodial measures such as community supervision, probation, house arrest and halfway houses. Accordingly, Sri Lanka has been practicing community-based correction under the Community-Based Correction Act No 46 of 1999, and those who get community-based correction orders from the court have to undergo processes assigned by the Community-Based Correction Officer. Further, community-based correction is implemented for offenders involved in minor offences and who can be punished with less than two years of sentence considering the nature of the offence and the character of the offender. In addition to community-based corrections, persons who are found addicted to drugs can be sent to rehabilitation centres under the Bureau of the Commissioner General of Rehabilitation under the Bureau of Rehabilitation Act, No. 2 of 2023, instead

¹³ Ibid.

¹⁴ Ibid

¹⁵ Nayomi Wickramasekera, "Alternative Sentencing in Sri Lanka and its Challenges from a Rehabilitative Perspective" (2020) https://www.unafei.or.jp/publications/pdf/RS_No114/No114_11_PART_ONE_Partici pants_Papers_04.pdf Accessed 30 January 2024.

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of sentencing them to imprisonment. Accordingly, the persons who are likely to be imprisoned are detained in these rehabilitation centres.¹⁶

In addition to the above measures, suspended sentences are another measure to reduce prison overcrowding which comes under section 303 of the Code of Criminal Procedure [Amendment] Act No 47 of 1999. A suspended sentence cannot be imposed on an offender where the law provides a mandatory minimum sentence for the offence he has committed, or where the offender is serving a term of imprisonment or is yet to serve the term of imprisonment which has not been suspended, or where the offender committed the offence while he/she was on a probation order, conditional release or discharge, or where the term of imprisonment or the aggregate terms of imprisonment exceeds two years.¹⁷

Another measure is Conditional Discharge under section 306 of the Code of Criminal Procedure. Under this provision, the Court has the authority to discharge offenders conditionally on a bond, which will guarantee the good behaviour of the offender after release, also considering the offender's character, age, health etc. ¹⁸ Another non-custodial measure is mediation under the Mediation Boards Act No 72 of 1988 where minor disputes are mediated through settlement rather than processing in courts. The mediation board consists of three members who are respected figures in the area. ¹⁹

Most importantly, Sri Lanka is in the process of introducing the house arrest mechanism to reduce prison overcrowding.²⁰ A high-level committee has been appointed to review the proposal to implement the house arrest mechanism submitted by the Department of Prisons, and the reviewing process is in the final stage. In addition to house arrest, the government is in the discussion of implementing a plea-bargaining system to clear the backlog which amounts to about one million, and this system will expedite the cases²¹ and reduce the length of pre-trial detention through which the unconvicted population will be reduced.

B. Increasing Unconvicted Population

1. Overview of the Issue

This is another pressing issue and a reason for prison overcrowding in Sri Lanka. As of 30 December 2023, the unconvicted population in prisons was 20,699 out of the total population of 30,396²² which means two-thirds of the prison population is unconvicted prisoners. The following data demonstrates the issue of

Annual Admissions of Convicted and Unconvicted Prisoners, 2014 - 2022				
Year	Admissions		T-4-1	Datia
	Convicted	Unconvicted	Total	Ratio
2014	27,588	90,251	117,839	1:3
2015	24,086	89,559	113,645	1:4
2016	24,060	94,655	118,715	1:4
2017	22,833	99,036	121,869	1:4
2018	24,852	108,263	133,115	1:4
2019	29,164	115,325	144,489	1:4
2020	19,856	90,362	110,218	1:5
2021	14,547	62,426	76,973	1:4
2022	30,331	108,250	138,581	1:4

Source - Prison Statistics vol 42 - 2023

¹⁹ Ministry of Justice https://www.moj.gov.lk/index.php?option=com_content&view=article&id=30&Itemid=178&lang=en Accessed 30 January 2024.

¹⁶ Bureau of Commissioner General of Rehabilitation https://www.moj.gov.lk/index.php?option=com_content &view=article &id=356&Itemid=276&lang=en> Accessed 28 January 2024.

¹⁷ Wickramasekera, *supra*, n. 15.

¹⁸ Ibid.

²⁰ Ada Derana https://www.adaderana.lk/news.php?nid=95590 > Accessed 29 January 2024.

²¹ Daily Mirror https://www.dailymirror.lk/worldnews/breaking_news/SL-to-introduce--Plea-Bargaining-proc edures--to-ease-backlog-of-cases-in-courts%3A-Wijeyadasa/108-263107 Accessed 31 January 2024.

²² Department of Prisons, 'Morning Unlock' (30.12.2023).

the higher unconvicted population. As per the data, the unconvicted to convicted ratio is $4:1^{23}$ which means in general four cases out of five cases are not proven guilty before the court. This higher unconvicted population is the main reason for overcrowding.

2. Initiatives to Overcome the Issue

The Department of Prisons has been making efforts to reduce this population through different initiatives, but it has been challenging as these inmates are on trial and under the authority of the judiciary. Accordingly, the Department together with the ICRC organized several awareness programmes for judges to make them aware of the prevailing overcrowding situation and other challenges in prisons with possible alternatives to reduce the unconvicted prison population. In addition to that close coordination and cooperation among law enforcement agencies like police, judiciary, and government analysts have been a good initiative in reducing the prison population. For example, the testing reports (drug testing and other expert reports) of the government analysts are essential to speed up the trial cases. So, the process of obtaining these reports has been sped up through close coordination among relevant government officials. In addition, awareness programmes have been organized for prison staff to make them aware of the available laws and regulations (Remand Prisoners' Release Act) that the prison authorities can use to release unconvicted inmates.

C. Drug Addicts in Prisons

1. Overview of the Issue

Drug offenders in prisons have been one of the biggest pressing issues of prisons in Sri Lanka. As of 30 December 2023, 15,756 out of 30,396²⁴ of the total prison population have been drug-related offenders, which means 50% of the total prison population is drug-related offenders. Further, a significant number of drug offenders are drug addicts as well. As per the statistics, 51.6% in 2018, 51.9% in 2019, 47% in 2020, 64.2% in 2021 and 60.9% in 2022 are drug offenders from the total convicted prison population, ²⁵ which is the biggest component of the convicted population. The recidivism rate among drug offenders was 17.7% in 2022.²⁶

2. Initiatives to Overcome the Issue

Accordingly, the Department of Prisons has established ten centres under prison institutions to rehabilitate drug offenders and different kinds of rehabilitation programmes including counselling, vocational training, and religious programmes. These programmes carried out for the inmates in these centres. As per the prison statistics, 1,500 inmates were under rehabilitation in the above centres as of 19 January 2024.²⁷ It is expected that recidivism among drug offenders will be reduced through these centres, which will reduce the prison population.

D. Shortage of Human Resources

1. Overview of the Issue

The shortage of officers has been a big issue in carrying out the daily routine in prison institutions in Sri Lanka. As a result of that prison management has been facing many difficulties in managing the institutions. The approved cadre of the Department is 7,872 of 85 positions. The available cadre is 6,268 and the shortage is 1,617.28 When such a shortage exists, assurance of security, custody, proper care, rehabilitation and maintenance etc. is immensely challenging. Sometimes, the number of inmates to be supervised by an officer can be large, and both the inmates and the officer are negatively impacted.

2. Initiatives to Overcome the Issue

The Department of Prisons, with the ministry, has taken several initiatives to overcome this pressing issue. Accordingly, one of the initiatives is the recruitment of military officials to the Department of Prisons as prison officers.²⁹ Though the Thirty Years' War, which prevailed in the country, ended in 2009, a big cadre of military officials are still in service, and they are already paid salaries from the treasury. Therefore, the

²³ Prison statistics of Sri Lanka (2023), 42.

²⁴ Ibid.

²⁵ Prison statistics of Sri Lanka (2023), 42.

²⁶ Ibid.

²⁷ Department of Prisons, "Morning Unlock" (19 Jan. 2024).

²⁸ Department of Prisons, "Performance Report" (2022) http://prisons.gov.lk/web/wp-content/uploads/2023/08/performance-report-2022_EN.pdf Accessed 29 January 2024.

²⁹ Ibid.

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Department of Prisons is in the process of recruiting eligible military officials as prison officers after training them for prison administration. These officers have to resign from military service to join the Department of Prisons as prison officers, and they are not considered as military officials anymore. Further, the government does not want to allocate additional funds for the salary payments of these officers as the treasury already allocates the funds. In addition to the above initiative, the Department of Prisons has been taking assistance from police officials to ensure the security of outer perimeters and outside escorts of inmates due to the shortage of prison officers, although they have no authority to be involved in prisoner administration.

Further, the Department is currently in the process of recruiting 300 new officers through the normal process which consists of a competitive examination, fitness test as well as a structured interview. This recruitment is at the examination stage. The entire process including induction training will be concluded in 2024, and they will be assigned duties in prison institutions throughout the country. Another initiative is the employment of civil officials from other services for office administration in prison institutions instead of attaching prison officers to such office work. This facilitates the maximum use of prison officers for prisoner management. However, the prison management is careful not to assign office work to such civil officials, which is mostly relevant to prisoners' file management and other confidential matters. Further, different capacity development programmes including higher educational opportunities and international training programmes are provided for officers to make them more efficient and effective in performing their duties. Accordingly, about 1,000 officers have been trained through the UNODC on dynamic security, incident management, management of violent extremist prisoners, etc. since 2022.30 Moreover, due to the shortage of officers, the Department of Prisons has allowed officers to work overtime and on holidays on payment basis. The above initiatives have significantly assisted in mitigating the impact of the shortage of human resources within the prisons in Sri Lanka. Further, there are some instances where trustworthy inmates are utilized for minor duties under the supervision of officers as a solution for the shortage of officers and as a rehabilitation strategy.

E. Lack of Modern Technologies

1. Overview of the Issue

The lack of modern technologies in correctional facilities in Sri Lanka has been another issue, and it has made the processes in prisons more complex. Further, due to the lack of technology, it has been a challenge to searches, prevention of contraband in prisons, waste of time and labour force, etc. This issue further aggravates the shortage of human resources. If the technological solutions are adequately available, they can be a solution for the shortage of officers.

2. Initiatives to Overcome the Issue

The Department of Prisons has made several efforts to introduce technological initiatives to the systems. Accordingly, E-visits were introduced to the systems through which families are provided facilities for online visitation.³¹ This was a great initiative during the Covid-19 pandemic as physical visits had been suspended and also lockdowns were constantly implemented in the country. Further, the Prison Information Management System (PIMS) has been introduced for the registration of inmates and other daily routines of the inmates.³² In addition to the above, CCTV surveillance, mobile phone signal jamming systems, body and parcel scanners, etc. have been introduced. Further, the Department of Prisons together with the UNODC has been establishing facilities in three southern prisons for virtual court productions.³³ However, the Department has not been able to introduce these technologies to all prison institutions due to financial constraints. Further, some of these initiatives are assisted by ICRC, UNODC and other such non-governmental bodies.

F. Old Prison Infrastructure

1. Overview of the Issue

Most of the urban prisons in Sri Lanka are old, and some of those prisons were established during the colonial period. Therefore, infrastructure facilities in these prisons are very old and sometimes, the structures of the facilities are not in line with international standards. Further, some of the buildings in some prisons have been abandoned due to their dilapidated status. Moreover, as these buildings are very old, the sanitary

³⁰ Ibid.

³¹ Ibid.

³² Ibid.

³³ Ibid.

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and other infrastructure facilities must be renovated or repaired frequently.

2. Initiatives to Overcome the Issue

Accordingly, the Department of Prisons has taken some initiatives to manage this issue. A major initiative is urban prison relocation, or shifting to other places where new correctional facilities will be established in accordance with international standards.³⁴ In addition to that, the treasury has been allocating more funds in recent years to develop sanitary facilities in such prison institutions. As per the prison statistics, the government has allocated LKR 600 million in 2021, 200 million in 2022, 300 million in 2023, and 400 million for the year 2024. Moreover, the Department has been getting assistance from non-governmental organizations such as ICRC and UNODC to develop prison infrastructure. Accordingly, the ICRC has assisted in converting several prison kitchens which used firewood into gas lines, and the UNODC has been assisting in developing prison industries, kitchens in prisons, and constructing mock-up cells and virtual courts, etc.³⁵

III. CONCLUSION

The Department of Prisons in Sri Lanka has been playing a vital role in the criminal justice system in the country through custody, care and corrections of the prison inmates. However, the accomplishment of these tasks has been a challenge due to prevailing pressing issues in the system such as overcrowding, higher unconvicted prison population, drug offenders in prisons, shortage of human resources, lack of modern technologies and old prison infrastructures. The Department of Prisons has been moving forward initiating various programmes, projects and strategies to overcome the above pressing issues. Accordingly, prison relocation with more space and facilities, construction of pre-fabricated and permanent buildings in space available prisons, implementation of parole systems, and implementation of alternatives to imprisonment have been in place to overcome the overcrowding issue. Further, awareness programmes for judges regarding prevailing situations in prisons, close coordination and cooperation among law enforcement agencies and awareness programmes for prison staff to make them aware of the available laws and regulations (Remand Prisoners' Release Act) that the prison authorities can involve in releasing unconvicted inmates etc. have been carried out to reduce the unconvicted prison population. In addition to that the initiatives of recruitment of military officials as prison officers after proper training, taking assistance from police officers for outer wall security, initiatives to new recruitments, development of the capacity of already available officers through government and other funding as well as international training and higher study opportunities in universities and overtime work and holiday work on payment basis etc. have been implemented to manage the shortage of human resources. Moreover, the installation of surveillance cameras, the introduction of e-visitation and information management system for registration and file management of inmates as well as the establishment of mobile phone jamming systems etc. have been put into practice as technological initiatives.

However, it is imperative to highlight that all the above initiatives have not resolved the pressing issues completely, but they have been able to contribute to the mitigation of their impact. Further, it is also essential to mention that some of the above initiatives are more effective and efficient than some other initiatives.

³⁴ Ibid.

³⁵ Ibid.