



Analysis of Penal Enforcement Systems in the Context of Probation: International Experience and Practice of Implementation

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Abstract

This article examines international approaches to the implementation of probation as an alternative to custodial sentences within penal enforcement systems. The primary aim is to conduct a comparative legal and institutional analysis of probation frameworks in Kyrgyzstan, Kazakhstan, Turkey, and selected European Union countries, including the United Kingdom, the Netherlands, Sweden, France, and Germany. The study applies a structural-functional methodology and legal-document analysis to explore the regulatory models, operational mechanisms, and practical challenges of probation systems. Findings reveal that probation serves as a cost-effective and humane penal instrument aimed at reducing recidivism and promoting the social rehabilitation of offenders. However, its effectiveness is often constrained by inadequate funding, shortage of trained personnel, and institutional fragmentation. The article concludes that successful probation systems require coordinated inter-agency efforts, individualised resocialisation programmes, and continuous oversight, and recommends integrating international best practices adapted to domestic socio-legal contexts.

Keywords: *prevention of recidivism; legal reforms; alternative punishments; rehabilitation of convicts; probation practice*

Introduction

In recent decades, many countries have been reviewing their penal systems, moving away from the traditional prison system in favour of alternative sentencing measures such as probation. The integration of probation into criminal proceedings not only meets the requirements of international rights, but also provides more humane and effective justice, thus allowing for the social rehabilitation of offenders without isolation from society, reducing recidivism rates and the burden on the prison system. One of the key objectives of the modern justice system is the reintegration of convicts into society. Probation, as a form of supervision and support for offenders, can achieve this goal more effectively by providing an opportunity for social adaptation and correction without lengthy sentences. Probation is significantly cheaper for the state compared to keeping offenders in prisons. This makes the study of the institution of probation particularly relevant in terms of the economic costs to the penal system. In the context of the struggle to respect human rights and minimise the violation of the rights of convicted persons, the probation institution is one of the mechanisms to mitigate the repressive aspects of criminal punishment while preserving public safety. In many countries, prisons are overcrowded, leading to deteriorating prison conditions and increasing levels of violence. Probation helps to relieve pressure on the prison system by diverting inmates to alternative sentences. Probation systems can incorporate modern technology (electronic monitoring, online reporting), making them adapted to the digital age and more effective in tracking offenders' behaviour. Studying international experience and practice implementation of probation systems can help in developing a fairer, more effective and humane system of punishment.

According to the research of Shadymanova et al. (2023), the institute of probation is an important element of the system of execution of punishment, as it allows control over convicts who are at liberty. As Zhetigenova (2020) indicates, the effectiveness of this institution is often questionable because it requires significant resources, trained staff and monitoring. Funding problems, lack of qualified professionals and difficulties in establishing trusting

relationships with inmates' present challenges to the implementation and effective operation of the probation institution.

Having researched this topic, Zhanozakova et al. (2024) argue that the penal system in many countries has undergone significant changes, shifting the focus from exclusively punitive measures to re-socialisation and rehabilitation of convicts. Pursuant to Mukasheva et al. (2024), probation has become one of the key components of these changes, which is a form of supervision of convicts that allows them to remain in society provided they comply with certain rules and requirements. Probation aims to reduce the recidivism of offences, improve the integration of convicts into society and alleviate the burden on the prison system (Borko & Vilks, 2023). Her report reviews international experience in the application of probation and analyses successful practices in various countries.

Globally, according to the study by Toktogazieva et al. (2020), probation is considered an important element of the modern criminal justice system. International organisations such as the United Nations (UN) and the Council of Europe are actively promoting standards and guidelines for the introduction and development of probation. An example is the United Nations Standard Minimum Rules for Non-Custodial Measures (The Tokyo Rules, 1990), which call for the use of probation as an alternative to imprisonment.

In conformity with the findings of Zhakenov et al. (2024), the peculiarities of the practice of implementation of the institute of probation include the development of individual programmes of re-socialisation of convicts, constant monitoring of their implementation, social and psychological support of convicts and their families, as well as participation in the rehabilitation of convicts through social and preventive work. As noted by Rakhimova et al. (2023), the practice of implementing the probation institution varies depending on the country, legislation and social structure. However, in most countries, this institution is orientated towards the rehabilitation of convicts and the reduction of recidivism, which is a common priority for all probation systems. The practice also includes collaboration with other institutions and professionals in the penal

system to share information and coordinate the implementation of re-socialisation programmes.

According to a study by Akimzhanov et al. (2024), sentencing with probation offers a more humane and effective approach to the rehabilitation of offenders, aimed at reducing recidivism and integration into society. While non-probation sentences can temporarily eliminate the threat to society, they also create long-term problems such as high costs of incarceration and increased recidivism. It is important that criminal justice systems take these aspects into account when developing their programmes and strategies.

There are several aspects that remain unexplored or require further research. Differences in the effectiveness of probation across countries and regions have not been sufficiently explored. More comparative research is needed to understand which approaches work better in different contexts. Research is needed on the long-term effects of probation on offenders, including recidivism rates and successful reintegration into society.

The aim of this article is to analyse the legislative framework and regulations governing the institute of probation in different countries. Objectives of the study: to investigate the concept of probation institution and their goals and functions in the system of execution of punishment, to analyse the legislative and institutional mechanisms of implementation of probation programmes in Kyrgyzstan, Turkey, Kazakhstan and European countries, to assess the impact of probation programmes on reducing recidivism rates, to identify common features and differences in the legislative regulation of probation in international practice.

Materials and methods

The study used the structural-functional method, comparative legal method, document analysis, and case-based observation. These methods were applied to examine the legislative frameworks, institutional structures, and implementation practices of probation systems across selected countries.

Through the structural-functional method, the key concepts of the topic “probation”, “probation supervision”, and “suspended sentence” were investigated. The concept of punishment in the context of the institute of probation and its essence was studied. The main elements of probation, namely preventative probation, penal probation, and post-penitentiary probation, were also analysed.

The theoretical foundations and principles of the probation institution are studied. International experience of the introduction of probation institute is studied. The main types of punishments within the framework of probation are considered. The advantages of probation over punishment, as well as the effectiveness of probation in preventing recidivism of crime, have been considered. It was analysed which structures are authorised state bodies in the execution of punishments in the context of the probation institution in the studied countries, as well as the problems in the field of control over the activity of probation bodies and mechanisms of their control.

The peculiarities of probation systems in the context of cultural and socio-economic factors of each country are considered. A comparative study of the systems of execution of punishment with the participation of probation in Kyrgyzstan, Kazakhstan, Turkey, and some countries of the European Union, namely Great Britain, Germany, France, Sweden, and the Netherlands has been carried out. The issue of historical development of probation institution in the above-mentioned countries was also considered. Legal documents and acts that regulate probation in different countries have been studied in order to identify similarities and differences in approaches. Problems and challenges that arise in the implementation of the probation institution were analysed, in particular, the problem of funding, lack of qualified staff, development of corruption, weak control and supervision.

As part of the study of this topic, the following legal acts were studied: Law of the Kyrgyz Republic No. 34 “On Probation” (2017), Resolution of the Kyrgyz Republic No. 297 “On Approval of the National Strategy for the Development of the Criminal Executive (Penitentiary) System of the Kyrgyz Republic for

2012–2016 years” (2012), Law of the Republic of Kazakhstan No. 38-IV LRK “On Probation” (2016), Probation of Offenders Act (1907), Criminal Procedure Code of the Netherlands (Wetboek van Strafrecht) (1921), Swedish Criminal Code (1962), German Criminal Code (Strafgesetzbuch – StGB) (1998), French Law on the Execution of Sentences (2009), Penal Code of Turkey (2004), Recommendation CM/Rec(2010)1 of the Committee of Ministers to Member States on the Council of Europe Probation Rules (2010). A study by the Department of Probation Institute of the Ministry of Justice of the Kyrgyz Republic and the Report on Monitoring the Rights of Probation Clients (Apparatus of the Akyikatchy (Ombudsman) Kyrgyz Republic, United Nations Office on Drugs and Crime, 2022) were also analysed.

Results

Historically shaped by the Soviet punitive legacy, Kyrgyzstan’s justice system has been characterised by a predominant reliance on custodial sentencing and institutional incarceration. Although legislative reforms in recent years, such as the Law of the Kyrgyz Republic No. 34 “On Probation” (2017), mark a shift toward more rehabilitative models, structural challenges persist.

As of 2022, the incarceration rate in Kyrgyzstan stood at approximately 180 per 100,000 inhabitants. This figure is moderate by international standards but still indicative of systemic dependence on imprisonment. According to the United Nations Office on Drugs and Crime (2023), detention conditions in many penal institutions remain unsatisfactory. Reported deficiencies include overcrowding, limited access to healthcare, inadequate sanitation, and insufficient rehabilitation infrastructure. These factors undermine re-socialisation efforts and increase the risk of recidivism.

National crime trends reveal a general decline in violent crime over the past decade. However, property crimes and offences linked to narcotics have grown proportionally, creating a demand for differentiated sentencing strategies. In this context, the probation system has emerged as a viable mechanism for relieving pressure on the penitentiary system and promoting social reintegration.

Although probation in Kyrgyzstan remains in its formative phase, institutional data from the Ministry of Justice indicate that by 2023 more than 2,700 individuals were serving non-custodial sentences under probation supervision. This expansion reflects increased judicial confidence in probation as an alternative sanction. Pilot projects supported by the United Nations Office on Drugs and Crime (2023) have further bolstered the system by offering professional reintegration support, psychological counselling, and community-based rehabilitation initiatives. Nevertheless, widespread implementation remains hindered by underfunding, a limited number of trained probation officers, and low societal awareness of the institution's rehabilitative role. In addition, concerns about the transparency of probation procedures have been raised, as corruption in the allocation or supervision of probation may undermine the system's credibility in some regions. These structural limitations necessitate comprehensive policy responses and long-term investment in institutional capacity building.

According to Recommendation CM/Rec(2010)1 of the Committee of Ministers to Member States on the Council of Europe Probation Rules (2010), probation services currently operate as separate services, usually within the Ministry of Justice, and are not part of the criminal justice system in most non-EU countries. The suspended sentence is at the heart of probation supervision. Previously, in Commonwealth of Independent States (CIS) countries, supervision was carried out by coercion. It is worth looking at probation and suspended sentence, how they differ and what they have in common.

Probation and suspended sentence are two different types of alternative criminal sanctions, but they can be used in combination depending on the law of the particular country. Here are their main differences:

1. Probation supervision is a system of control and supervision of a convicted person without actually keeping him/her in prison. And a condition of probation is that the convicted person is under regular supervision and control by a probation officer. Conditions may include mandatory meetings, compliance with certain rules and restrictions, participation in rehabilitation

programmes, etc. The main purpose of probation supervision is to prevent recidivism and ensure successful rehabilitation of the convicted person.

2. Suspended sentencing provides the convicted person with an opportunity to avoid actual deprivation of liberty if certain conditions are met. The conditions are that the convicted person is obliged to comply with certain conditions, such as conduct, commitment not to commit new crimes, participation in rehabilitation programmes, etc. The main purpose of suspended sentencing is also to prevent recidivism and to demonstrate the willingness of the convicted person to change his/her behaviour. The main purpose of probation is also to prevent recidivism and to demonstrate the convicted person's willingness to change his or her behaviour. However, some jurisdictions may use the terms differently and their meanings may overlap. It is important to pay attention to the specific laws and regulations in the country or region where the probation supervision system is applied.

Punishment in the context of probation provides an alternative to traditional forms of punishment such as imprisonment (Table 1). Probation provides offenders with the opportunity to serve their sentence while remaining in the community under the supervision of probation authorities, while at the same time facilitating their rehabilitation and preventing reoffending.

Table 1. Main types of punishments within.

Type of punishment	Essence and significance
Suspended sentencing with probation ordered	In this type of punishment, the convicted person is not deprived of liberty, but must fulfil certain conditions. If the conditions of probation are violated, the convicted person may be sent to prison to serve the sentence.
Deferred execution of sentence	Probation can be granted in the form of a deferral of the execution of the main sentence. The convicted person is given a chance to prove that he or she can reform without serving a prison sentence. If the conditions of probation are violated, the sentence will be enforced

Correctional labour	Within the framework of probation, convicts may be sent to perform community service (e.g., work in social institutions, improvement of public places, etc.). This type of punishment is considered effective in terms of social rehabilitation of offenders.
Social rehabilitation and educational programmes	Some probation systems require offenders to participate in social rehabilitation programmes, which may include psychotherapy sessions, anger management courses or alcohol and drug abuse prevention. Inmates may also be required to undergo vocational training or additional education.
Electronic monitoring	In some countries, offenders may be on probation using electronic monitoring that tracks their whereabouts (e.g., through electronic bracelets). This helps to monitor the offender's compliance with certain conditions, such as being at home at certain times.
Restorative Justice Programme (Restorative Justice)	In some cases, the probation system may include elements of restorative justice, where convicted offenders participate in reconciliation meetings with victims to discuss the consequences of the offence and find ways to make amends. This approach aims to restore social justice and correct the offender's behaviour.

Source: compiled by the authors based on Frase (2019).

As mentioned above, the institute of probation regulates not only those released on probation supervision, but also deferred execution, correctional and community service, electronic supervision based on electronic bracelets and other types of non-custodial sentences. The introduction of the institute of probation in the criminal law regulation increases the number of convicts without isolation from society, also with supervision and work with a psychologist or social worker can reduce recidivism.

Probation is a criminal enforcement mechanism that provides a convicted person with the possibility of release from prison before the full term of the

sentence has expired, subject to certain conditions. It is a form of alternative criminal punishment designed to support the rehabilitation of convicted persons and their successful return to society.

The advantage of probation over traditional incarceration in terms of funding is the significant reduction in public expenditure (Resler et al., 2025). Traditional imprisonment requires significant financial investment in the maintenance of correctional facilities: providing food, medical care, guards, utilities and other needs of prisoners. The cost per inmate in prison is usually very high. Probation, on the other hand, is less expensive because inmates are not held in institutions but are free under the control of a probation officer. The state does not bear the costs of their accommodation and basic needs, which significantly reduces the financial burden on the budget. In Kyrgyzstan, the cost of probation supervision is much lower than in developed countries and can range from USD 100 to USD 500 per year per inmate, taking into account local economic conditions (Uulu, 2024). It costs approximately USD 2,000-3,000 per year to keep one inmate in prison.

The probation authority is an authorised state body supervising persons released on parole from correctional institutions, as well as performing social and legal protection duties, and carrying out mandatory criminal law measures and non-social isolation penalties (Deitch, 2020).

The Probation Institute in the Republic of Kyrgyzstan operates within the Probation Department under the Ministry of Justice (Uulu, 2023). Probation includes a number of features, such as an individualised approach to convicts, assistance in their social rehabilitation and reintegration into society. The cooperation with other justice institutions to provide comprehensive support to convicts is also critical. The probation institute is also involved in monitoring compliance with the conditions of sentence enforcement and assists convicts with employment and education, which distinguishes it from the traditional penal system.

One of the ways in which the institution of probation is used in Kyrgyzstan is to impose probation instead of imprisonment if the offence does not pose a danger to society. Probationers undergo special re-socialisation programmes to help them integrate into society. People on probation must comply with court-ordered conditions, including regular visits to supervisors, participation in educational programmes and community service (Fox, 2021). In Kyrgyzstan, there are programmes to support people on probation, which aim to provide them with vocational training and psychological support. This contributes to reducing recidivism and faster reintegration into society. Lack of funding and qualified staff reduces the effectiveness of the programme. Probation is not yet perceived as a full-fledged substitute for imprisonment, which creates difficulties in public perception (Soung, 2022)

Thus, the Penal Code of the Republic of Kazakhstan was amended and Law of the Kyrgyz Republic No. 34 “On Probation” (2017) was signed. The main structural links of the institute of probation are state and territorial probation bodies. They are guided in their activities by the legislation of the Kyrgyz Republic, and their main task is to release convicted persons on parole or substitute punishment, as well as to ensure public order. State and territorial probation service bodies are also engaged in the implementation of the activities of the probation service, development of recommendations to the bodies for consideration of the issues of conditional early release of convicted persons and persons serving sentences in various types of restraint, consideration of information on the behaviour of persons released on parole and appointment of additional restraint measures, implementation of control over persons released on parole and during sentence commutation, organisation of their labour, work, and recreation.

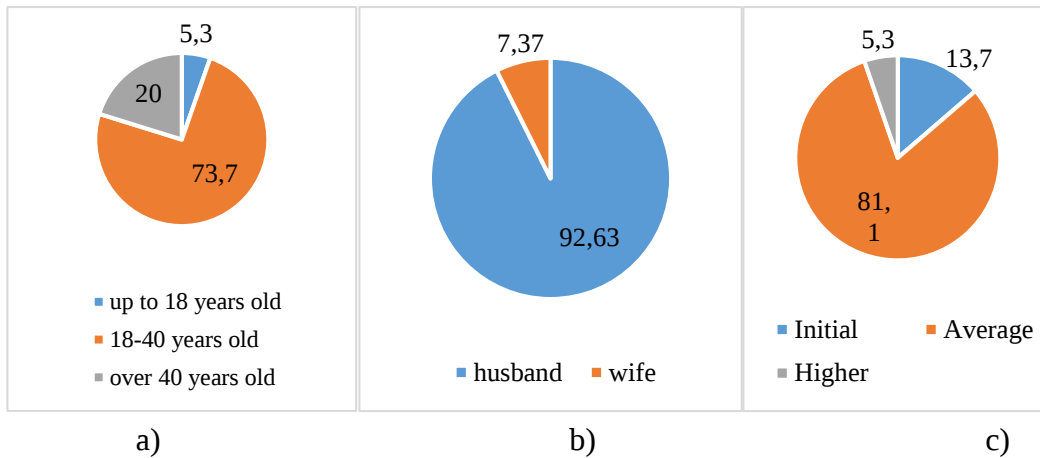
In accordance with Resolution of the Kyrgyz Republic No. 297 “On Approval of the National Strategy for the Development of the Criminal Executive (Penitentiary) System of the Kyrgyz Republic for 2012-2016 years” (2012) and the provisions of Law of the Kyrgyz Republic No. 34 “On Probation” (2017), the probation service includes the Penitentiary Service under the Ministry of

Justice of the Kyrgyz Republic, territorial departments of the penal enforcement service under the Government of the Kyrgyz Republic, territorial centres for social adaptation, and organisations exercising public control over the activities of the probation service. The Penitentiary Service under the Ministry of Justice of the Kyrgyz Republic is a State body that ensures the organisation of the work of the probation service; develops, coordinates and monitors the implementation of State policy in the area of the enforcement of sentences established by law; develops methodological materials on the organisation and implementation of probation work and the introduction of modern forms, methods, and means of reducing the criminogenic situation in society; provides analytical information and statistical reports on the probation service and the penitentiary system. The territorial departments of the Penal Enforcement Service under the Government of Kyrgyzstan, in addition to the functions of the department, also fulfil the functions of the territorial bodies of the probation service.

The institution of probation is used by the court in various countries as a punitive measure that allows a convicted person to remain free under the supervision of probation authorities. Those on probation must regularly visit their probation officer, and comply with court-ordered conditions (e.g., undergo a drug treatment programme, get a job or participate in community service) (Ruhland et al., 2020). Inmates are provided with social adaptation programmes that include vocational training, psychological support, family work and other supports for successful reintegration. Probation services monitor the progress of the convicted person to ensure that he or she fulfils all conditions set by the court and does not pose a threat to society.

The Department of the Probation Institute under the Ministry of Justice of the Kyrgyz Republic conducted a study, namely a questionnaire survey of probation clients, which was conducted anonymously. A total of 138 respondents took part in it. According to the results of the study, it was found that the majority of probation clients are men (92.63%) aged 18 to 40 years (73.7%), with completed secondary education (81.1%) Figure 1.

Figure 1. Results of the study by the Department of Probation Institute of the Ministry of Justice of the Kyrgyz Republic: a) Distribution of clients by age; b) Distribution of clients by gender; c) Education



Source: compiled by the authors based on Apparatus of the Akyikatchy (Ombudsman) Kyrgyz Republic, United Nations Office on Drugs and Crime (2022).

After the introduction of the institute of probation in the Kyrgyz Republic, the number of people in penal colonies in the Republic has sharply decreased. Thus, the question of the need for settlement colonies in the Republic has arisen. At this stage, the Ministry of Justice of Kyrgyzstan is actively discussing the reorganisation of the settlement colonies and mechanisms for re-profiling convicts and staff of the colonies into probation agencies. Since the Soviet period, 10 institutions of settlement colonies have been built throughout the country, which provided food, clothing, and other necessary products to the closed colonies in the country. But with the changes in the legal acts for 2024 the population of the colonies does not exceed 1,200 people, of whom permanently residing does not exceed 140 people in the country (State Programme for..., 2024).

The probation institute in Kazakhstan has been developing since 2006. The principles of activity are voluntary participation in correctional programmes for convicts, benevolence, personalisation, confidentiality, business principles,

humanism and individual approach to persons subject to social and legal support of the probation service (Turgumbayev et al., 2022).

The probation system in Kazakhstan was established by adopting a special Law of the Republic of Kazakhstan No. 38-IV LRK “On Probation” (2016). The new law laid down the legal framework for probation activities. A probation service was also established. In 1998, there was no real institute of probation, and the law was essentially inactive. Only in 1999, it was amended, and Article 73 of the Penal Code of the Republic of Kazakhstan (2014) was introduced. The status, objectives, and functions of the service were formulated. Also included was a set of probation criteria and rules for Prosecutor’s Office officials referring convicted persons to probation, as well as the functions of the National Probation Service.

On 22 May 2020, the Ministry of Internal Affairs of the Republic of Kazakhstan, the National Probation Academy and Probation of the Ministry of Internal Affairs signed an agreement on the establishment of joint educational training for the National Probation Service (Skinns, 2022). An educational programme on technical and vocational education of bachelors was introduced into the probation system of Kazakhstan, in particular for the National Probation Service. Later, the programme was also launched at the National Academy of Internal Training Execution.

The probation service is a system of state bodies and legal persons of public law, acting on the basis of unified approaches in accordance with the legislation, which exercise control over convicted persons serving a criminal sentence of deprivation of liberty and inform them of the requirements established by the court. It also supervises the organisation of the life of persons on whom the court has imposed a suspended sentence until the expiry of the probation period, preventing the commission of the relevant criminal offence. In addition, social, psychological and educational measures are implemented aimed at the adaptation of convicted persons who have served their sentence and have been transferred to probation supervision, the completion of their resocialisation and reintegration, and their success in social and professional activities.

The practice of implementing penal enforcement systems in the context of probation in Kazakhstan and Kyrgyzstan includes the use of alternative sentencing measures aimed at reintegrating prisoners into society and reducing recidivism. In both countries, the probation system aims to humanise criminal justice and reduce the burden on prisons. Probation in Kazakhstan, as in Kyrgyzstan, is ordered both before and after trial (Gallop, 2022). The main elements of probation are:

- ✓ *preventive probation* — applied before sentencing and aimed at checking the defendant's behaviour, social ties and the possibility of rehabilitation;
- ✓ *penitentiary probation* — includes social assistance to prisoners in detention centres, preparing them for reintegration into society;
- ✓ *post-penitentiary probation* — works with people released from prison, helping them to adapt to life on the outside, find work and receive psychological support.

Although Kazakhstan is actively introducing re-socialisation programmes, providing convicts with employment opportunities, social and psychological support, and participation in various rehabilitation programmes to help reduce recidivism, funding problems and a lack of qualified personnel limit the effectiveness of probation (Tatikov et al., 2025).

The practice of implementing sentence enforcement systems in the context of probation in European countries demonstrates a wide variety of approaches based on humanising the criminal system and reducing recidivism. European countries have a long history of successfully using probation as an alternative to imprisonment for persons who have committed less serious offences. Probation aims at rehabilitation, social adaptation and the prevention of re-offending.

The UK is considered to be one of the countries where probation is most fully realised. The probation system here includes comprehensive rehabilitation programmes for inmates, as well as support through professional probation officers. Inmates can be referred to courses on aggression management, drug treatment, and community service. Special attention is given to those at high risk

of reoffending. Probation of Offenders Act (1907) – the first law that formally introduced the institution of probation into the British legal system. It gave the courts the power to use probation as an alternative to imprisonment. In the UK, probation is a flexible mechanism that can include various supervisory measures, commitment to rehabilitation programmes, socially useful work and other forms of accountability. Probation is regulated by independent agencies such as the National Probation Service, operating under the direction of the Ministry of Justice (Phillips, 2019).

In the Netherlands, probation is actively used and accompanied by the use of electronic bracelets to monitor convicts who are under house arrest. Probation services work with convicts to ensure their social adaptation through educational programmes, psychological support and employment. In the Netherlands, probation is regulated by a number of pieces of legislation and is administered by several organisations, notably Reclassering Nederland, which is responsible for supervising people serving sentences outside prisons (Boone et al., 2024). The main piece of legislation regulating probation is the Criminal Procedure Code of the Netherlands (Wetboek van Strafrecht) (1921) – which establishes the legal basis for imposing probation as an alternative sentence or part of a sentence. According to this law, judges may impose probation on persons who have committed offences of low or medium severity.

Sweden is known for its emphasis on the re-socialisation of offenders. Probation is seen as an important part of criminal justice, with a focus on preventing reoffending. The probation system includes work with the convicted person's family, violence prevention programmes and rehabilitation. The main legislation governing probation is the Swedish Criminal Code (Brottsbalken) (1962). In addition, there are by-laws regulating the work of the probation authorities and social programmes that contribute to the rehabilitation of convicts. Sweden tries to use probation to minimise the time spent by convicts in prison. Correctional programmes are part of this process. The Prison and Probation Service plays a key role in organising and implementing probation activities (Sutton et al., 2021). It is responsible for the supervision of convicts,

their employment, preparation for reentry into society, and cooperation with other social and healthcare institutions. Sweden is striving for a more humane system of punishment that emphasises the restoration of the individual rather than isolation from society.

In Germany, the institution of probation is regulated at the legislative level, which ensures its functioning in the criminal justice system. According to § 56 of the German Criminal Code (Strafgesetzbuch – StGB) (1998), probation allows the court to impose a suspended sentence, which means that a convicted person can avoid imprisonment if he or she fulfils certain conditions. As Germany is a federation, some aspects of probation may be regulated at the Länder level, allowing for local specificities to be taken into account in the rehabilitation process and the enforcement of probation conditions. In general, the legislative regulation of probation in Germany aims to achieve a balance between the social rehabilitation of convicts and ensuring public safety. This allows convicts to be able to integrate into society, avoiding imprisonment, as long as the law and social norms are respected.

France also makes extensive use of probation as an alternative to imprisonment for less serious offences. Probation is accompanied by programmes of employment and social adaptation. In some cases, probationers are required to attend specialised therapeutic programmes. The main law governing probation in France is called the French Law on the Execution of Sentences (2009), modernised in 2014 to better take into account the individual characteristics of offenders and improve reintegration. Probation (*sursis avec mise à l'épreuve*) is the main form of probation whereby a convicted person is given the opportunity to avoid imprisonment provided certain requirements are met, such as completing rehabilitation programmes, reporting a change of residence and meeting regularly with probation officers (Fernando, 2021).

The following areas are considered for further improvement of probation systems in Europe: expansion of rehabilitation and reintegration programmes with a focus on psychotherapeutic assistance, improving the qualifications of probation officers, improving coordination between probation services and

other social and legal institutions, introducing new technologies for monitoring and supporting convicts (e.g., electronic supervision systems).

The European probation experience is a significant contribution to the humanisation of criminal justice, offering a balance between punishment and rehabilitation of offenders. Probation-based sentencing systems in EU countries offer a wider range of post-release support measures for convicted offenders, such as assistance with employment and rehabilitation (Kruze and Priede, 2020). Whereas, non-probation systems are usually limited to supervising probationers and providing social rehabilitation services on a more limited level. In addition, probation contributes to reducing reoffending by providing convicts with additional support and assistance in adjusting to social life after serving their sentence. This improves the effectiveness of the penal enforcement system and reduces the likelihood of reoffending.

The penal enforcement system in Turkey is a complex structure that includes different types of institutions and organisations responsible for the control and supervision of convicts (Akgul et al., 2019). It also takes into account the laws and regulations governing the execution of punishment and rehabilitation of convicts. The probation institute plays an important role in this system, as it provides an opportunity for convicts to fulfil their sentences outside the closed institution under the guidance of probation officers. Understanding the basic principles and functions of this institution will allow for a more in-depth examination of its role in practice and its effectiveness in the context of the Turkish penal system. Probation in Turkey is legislated through several key pieces of legislation, the main one being the Penal Code of Turkey (2004). The law defines the principles, rules, and procedures under which the probation system in Turkey operates. The main provisions of the law include: the establishment of probation centres responsible for the management of probationers and supervising their rehabilitation and fulfilment of probation conditions, probation, socially useful work, rehabilitation programmes, supervision and control, and electronic monitoring.

For the convicted person, the probation institution is advantageous in such aspects as:

- ✓ preservation of freedom, rehabilitation, and maintenance of family ties (the convicted person can stay with his/her family, which reduces the social and psychological difficulties caused by the severance of family ties during imprisonment);
- ✓ reduction of stigma (probation helps to minimise the stigma faced by convicted persons after leaving prison);
- ✓ economic opportunities (while remaining free, the convicted person can continue to work or study, which improves the quality of life of the convicted person).

For society, the benefits of probation can be seen in reduced prison costs, reduced recidivism, reintegration into society (probation facilitates the successful social adaptation of convicts, which in the long term reduces social tensions and contributes to the return of convicts to a law-abiding life), support for victims of crime (in some probation systems, convicts may be required to make restitution to victims of crime, which helps to restore justice and trust in society), reducing prison overcrowding (probation reduces the burden on the prison system, which contributes to the more humane treatment of prisoners and reduces problems associated with prison overcrowding).

Probation has been shown to be highly effective in reducing recidivism. Many countries, such as the Netherlands and the United Kingdom, have introduced probation programmes that provide offenders with the necessary resources for re-socialisation and adaptation to society, thus reducing re-offending. International experience shows that countries adapt the institution of probation depending on their socio-economic conditions and legal systems. To increase the effectiveness of probation systems, it is necessary to develop educational and rehabilitative programmes, introduce modern technologies for monitoring and managing offenders, and strengthen cooperation between different public and private organisations. Thus, probation is an important component of penal

systems, but its successful functioning requires a comprehensive approach and appropriate support from the state and society.

Discussion

The scientific community's view of probation is a fundamental element of the modern criminal justice system. It is constantly on the radar of researchers because of its role in re-socialising offenders and reducing recidivism. The probation institution is considered by the scientific community as one of the humanistic and effective alternatives to incarceration. The system of punishment in the context of the probation institution implies the use of alternative measures of punishment instead of imprisonment. Probation acts as a form of control and rehabilitation of convicts, providing an opportunity to avoid imprisonment under a number of conditions. The system of punishment in the context of probation is a flexible and effective tool for reintegration of convicts into society but requires strict control and adequate funding to achieve its goals.

In international practice, probation institutions have been gradually becoming an integral part of the penal and correctional system for 20 years (Barash, 2022). Although probation as a method of executing non-custodial sentences is carried out by the staff of penal systems, it has an independent and determining significance for the realisation of penal powers. Annison (2022) has a similar view: in democracies that recognise the rehabilitation of offenders as an important social policy, probation organisations involved in the primary implementation of this policy are permanently operational and are endowed with the appropriate status and powers. At the initiative of the competent courts that identify gross violations of the penal code, probation officers may propose to prevent the execution of a sentence, in some cases recommending the imposition of a lighter sentence. A characteristic feature of probation institutions is loyal cooperation and a sense of mutual support and assistance with convicts on probation – a combination of coercion and social support. It is this combination that makes it possible to successfully assist offenders in finding and realising a positive life strategy.

As stated by Schaefer and Brewer (2022), probation is a neglected aspect of the criminal justice system. From both a normative and operational perspective, much of the legal and policy attention has centred on regulation relating to the trial and execution phases of the sentence. While the significance of the choice of punishment has changed over time and across prison systems, sentencing and execution provide the criminal arbiter and public opinion with a measure of the inevitably volatile reality of the severity of the state's and society's response to crime. The author's view is worth agreeing with because, despite the significant benefits that the institution of probation has for prison systems and societies of the world at large, its implementation is not always easy or effective. This implies that such institutions can pose unique threats to security and societal stability. As already noted, every criminal justice institution is a means of social response to crime.

In several European jurisdictions, particularly France and Sweden, the third sector plays a vital role in enhancing the implementation and supervision of probation and parole. Non-governmental organisations such as charitable foundations, community-based associations, and faith-based initiatives routinely collaborate with state agencies to deliver reintegration services, including psychological counselling, employment support, and housing assistance (Stróż et al., 2023). As Herzog-Evans and Sturgeon (2022) note in the French context, such partnerships enable a more individualised and socially embedded model of rehabilitation that is difficult for state probation services to achieve alone. Similarly, in Sweden, civil society actors contribute significantly to restorative justice practices and post-release support (Sutton et al., 2021). However, while these collaborative models offer substantial promise, they are often introduced in response to deep-rooted deficiencies in public probation systems. Herzog-Evans and Sturgeon also highlight that many probation services remain under-resourced and overstretched, with a critical shortage of trained personnel and inadequate supervisory capacity. This limits their ability to deliver consistent and individualised support, thereby undermining rehabilitative outcomes and increasing the risk of recidivism. The involvement of third-sector organisations partially compensates for these limitations by broadening the institutional

capacity of probation frameworks. Yet, without parallel investments in state infrastructure, training, and oversight, reliance on civil society risks masking systemic weaknesses rather than resolving them.

According to Fox et al. (2021), probation is an effective tool for reducing the burden on the penitentiary system, it also provides social support for offenders through rehabilitation programmes aimed at their re-socialisation and reduces re-offending. This is true because it provides an opportunity to reform individuals without isolation from society, which helps to support social ties that can help to avoid re-offending. Probation is particularly important for individuals who have experienced problems with addiction, violence or psychological disorders (Lisowski, 2024). The scientific community draws attention to the importance of a personalised approach to each offender. Also, according to research, those who have undergone probation programmes are more likely to successfully adapt to society and are less likely to re-offend compared to those who have served prison sentences. But it is also worth remembering that in some countries, probationers face social stereotypes and prejudice. This can make it difficult for them to reintegrate into society and create problems with employment and access to social services, which in turn increases the risk of reoffending.

In addition to the findings of Fox et al., research by Debus-Sherrill et al. (2021) confirms the economic feasibility of the probation institution, as the cost of keeping a person under probation supervision is significantly less than incarceration. In the US, the cost of keeping a person under probation supervision varies between USD 2,000-3,500 per year per inmate. It costs the state around USD 30,000-60,000 per year per person to keep an inmate in prison, depending on the state and the type of institution (e.g., federal or private prisons) (Leasure et al., 2024). This allows states to reduce prison costs. According to the study, the economic advantage of using probation is the reduction in state costs compared to traditional methods of punishment such as incarceration. Probation allows the state to reduce the cost of incarceration while providing

more flexible and effective forms of punishment and rehabilitation (Semenenko et al., 2024).

Jouet (2022) identifies probation as an important element in the humanisation of criminal justice, allowing for an individualised approach to each offender. Probation does offer convicted offenders the opportunity to avoid the harsh punishment of imprisonment if their offences do not pose a serious threat to society. It allows offenders to remain in their normal social environment, maintain family ties and employment, which significantly reduces the negative effects of imprisonment. Instead of isolation from society, probation emphasises corrective behaviour, which is in line with the principles of humanity and social justice.

As Houque et al. (2020) argue, in countries with high levels of corruption, offenders can obtain probation instead of imprisonment through bribes or personal connections. This results in serious offenders avoiding adequate punishment, undermining trust in the justice system. In probation systems where there is inadequate oversight of probation services, conditions for corruption can indeed arise (Rexha et al., 2024). This occurs when the actions of probation services are not closely monitored or there are no regular review mechanisms in place, probation officers may abuse their powers.

In conclusion, it can be noted that the penal enforcement system in the context of the institute of probation has its strengths and weaknesses. In order to improve it, it is necessary to conduct systematic research and analyse the effectiveness of the probation service, to develop new approaches to the rehabilitation of convicts and to monitor the enforcement of sentences. It is essential to strengthen cooperation between probation services and other institutions of the penal enforcement system, as well as to introduce modern information technologies for more effective data management and monitoring of work. Recommendations to improve the penal system in the context of probation should be evidence-based and take into account international standards in this field. The academic community continues to actively research the institution of probation, noting its importance in modernising the criminal

justice system and creating a more humane approach to the correction of offenders.

Conclusion

A probation institution is an integral part of the criminal justice system because it allows for the monitoring of convicts while they are still at large. Because it requires large amounts of money, highly trained staff and supervision, the effectiveness of this institution is regularly questioned. Funding problems, lack of qualified staff, and the challenge of establishing trustworthy relationships with inmates hinder the establishment and effective operation of a probation facility. Among the unique features of probation institution implementation practice are individual programmes of re-socialisation of convicts, constant supervision of their implementation, social and psychological support of convicts and their families, as well as participation in the rehabilitation of convicts through social and preventive work.

Depending on the country, its legal system and social structure, probation institutions are implemented in different ways. The probation institution in Kyrgyzstan as well as in other countries such as the Netherlands and Germany, France, Kazakhstan, Turkey, Sweden, was introduced to humanise the criminal system and reintegrate convicts into society, minimising their stay in prison. This mechanism plays an important role in reducing recidivism rates, easing the burden on the prison system and providing alternative sentences for those who have committed less serious offences. Probation aims to help convicted prisoners return to normal life by providing them with the opportunity to undergo various social programmes and employment assistance.

The use of probation reduces the number of people serving sentences in custody, which is particularly important when prisons are overcrowded. Probationers are supported through individual rehabilitation plans, which reduces the likelihood of re-offending. Probation provides an opportunity to avoid prison time for those who have committed less serious offences, provided that certain obligations and conditions are met. International experience shows

that countries adapt probation depending on their socio-economic conditions and legal systems.

In conclusion, the system of sentence enforcement in probation institutions has both advantages and disadvantages. The effectiveness of the probation service should be systematically researched and analysed, new strategies for the rehabilitation of convicts should be developed, and the enforcement of sentences should be monitored with a view to improving it.

One of the main limitations in researching this topic is that probation statistics in the countries studied are incomplete or outdated. This limits the ability to analyse and compare the effectiveness of probation systems internationally. Furthermore, comparing probation systems across countries is complicated by significant differences in legal systems and approaches to criminal law. These differences can lead to difficulties in developing universal conclusions.

One important area for future research is to examine in depth the extent to which the probation institution actually contributes to reducing reoffending in different countries. An important issue remains the identification of factors that influence the success or failure of probation.

References

- Akgul, A., Akbas, H., & Kule, A. (2019). Probation System in Turkey: An Analysis of a Public Policy Formation Using Multiple Streams Framework. *International Journal of Comparative and Applied Criminal Justice*, 43(4), 325-340. <https://doi.org/10.1080/01924036.2019.1578673>
- Akimzhanov, T. K., Ayubaev, M. A., Usenova, M. B., Bekbayeva, A. A., & Urbisinova, N. E. (2024). Institute of Conditional Early Release from Punishment in the Republic of Kazakhstan and its Significance in the Rehabilitation of Convicts. *Kurdish Studies*, 12(2), 6351-6363. <https://doi.org/10.58262/ks.v12i2.471>
- Annison, H. (2022). The Role of Storylines in Penal Policy Change. *Punishment & Society*, 24(3), 387-409. <https://doi.org/10.1177/1462474521989533>
- Apparatus of the Akyikatchy (Ombudsman) Kyrgyz Republic, United Nations Office on Drugs and Crime (2022). *Monitoring Report on Respect for the Rights of Clients Probation*. Bishkek: United Nations Office on Drugs and Crime. https://drive.google.com/file/d/163hTyZfR_PkuVhN-bIE9_io9NV_Bvss3/view?usp=sharing
- Barash, Y. (2022). Modern means of correction and resocialization of convicted persons. *Law Journal of the National Academy of Internal Affairs*, 12(1), 41-47. <https://doi.org/10.56215/04221201.41>
- Boone, M., Bosker, J., & Doekhie, J. (2024). Probation Supervision in the Netherlands. In I. Durnescu, J. M. Byrne, B. J. Mackey, & F. S. Taxman (Eds.), *The Routledge Handbook on Global Community Corrections* (pp. 195-214). London: Routledge. <https://doi.org/10.4324/9781003305149>
- Borko, T., & Vilks, A. (2023). Consequences and threats of international terrorism for Ukraine. *Foreign Affairs*, 33(3), 43-50. [https://doi.org/10.46493/2663-2675.33\(3\).2023.43-50](https://doi.org/10.46493/2663-2675.33(3).2023.43-50)
- Criminal Procedure Code of the Netherlands (1921). https://sherloc.unodc.org/cld/document/nld/1921/criminal_procedure_code_of_the_netherlands.html
- Debus-Sherrill, S., Breno, A., & Taxman, F. S. (2021). What Makes or Breaks Evidence-Based Supervision? Staff and Organisational Predictors of Evidence-Based Practice in Probation. *International Journal of Offender Therapy and Comparative Criminology*, 67(6-7), 662-686. <https://doi.org/10.1177/0306624x211049182>
- Deitch, M. (2020). But Who Oversees the Overseers?: The Status of Prison and Jail Oversight in the United States. *American Journal of Criminal Law*, 47(2), 207-273.

- Fernando, R. (2021). Desistance from Crime and Probation Supervision: Comparing Experiences of English and French Probationers. *Probation Journal*, 68(2), 224-242. <https://doi.org/10.1177/02645505211012062>
- Fox, C., Harrison, J., Hothersall, G., Smith, A., & Webster, R. (2021). A Rapid Evidence Assessment of the Impact of Probation Caseloads on Reducing Recidivism and Other Probation Outcomes. *Probation Journal*, 69(2), 138-158. <https://doi.org/10.1177/02645505211025595>
- Frase, R. S. (2019). Suspended Sentences and Freestanding Probation Orders in US Guideline Systems: A Survey and Assessment. *Law and Contemporary Problems*, 82, 51-79.
- French Law on the Execution of Sentences (2009). <https://encyclopedie.wikiterritorial.cnfpt.fr/xwiki/bin/view/fiches/L%27application%20de%20la%20loi%20p%C3%A9nale%20dans%20le%20temp%20et%20dans%20l%27espace/>
- Gallop, S. (2022). The Problem with Judicial Independence: What Lessons Can Be Learnt from the USSR in Today's Democratising States? *Nottingham Law Journal*, 30, 51-75.
- German Criminal Code (Strafgesetzbuch – StGB) (1998). https://www.gesetze-im-internet.de/englisch_stgb/englisch_stgb.html
- Herzog-Evans, M., & Sturgeon, J. (2022). French and Scottish Probation During the First Lockdown. In Search of the Heart and Soul of Probation. *Probation Journal*, 69(2), 197-215. <https://doi.org/10.1177/02645505221087976>
- Houqe, M. N., Zahir-Ul-Hassan, M. K., Idrus, M. A., & van Zijl, T. (2020). Bribery and Corruption: Assessing the Fairness of the Malaysian Judicial System. *Crime, Law and Social Change*, 74(2), 135-154. <https://doi.org/10.1007/s10611-019-09882-1>
- Jouet, M. (2022). Foucault, Prison, and Human Rights: A Dialectic of Theory and Criminal Justice Reform. *Theoretical Criminology*, 26(2), 202-223. <https://doi.org/10.1177/13624806211015968>
- Kruze, E., & Priede, J. (2020). Cost-Effectiveness of Prison System Development-Comparison of the European Countries. *European Integration Studies*, 14(2020), 69-79. <https://doi.org/10.5755/j01.eis.1.14.26384>
- Law of the Kyrgyz Republic No. 34 “On Probation” (2017). <https://cbd.minjust.gov.kg/111517/edition/1103351/ru>
- Law of the Republic of Kazakhstan No. 38-IV LRK “On Probation” (2016). <https://adilet.zan.kz/eng/docs/Z1600000038>

- Leasure, P., Berman, D. A., & Hrdinova, J. (2024). An Overview of Intermittent Confinement and Weekend Incarceration in the US. *Ohio State Legal Studies Research Paper No. 824*. Drug Enforcement and Policy Center. <http://dx.doi.org/10.2139/ssrn.4723504>
- Lisowski, P. (2024). International cooperation in combating drug trafficking: Contemporary challenges. *Foreign Affairs*, 34(3), 48-57. [https://doi.org/10.46493/2663-2675.34\(3\).2024.48](https://doi.org/10.46493/2663-2675.34(3).2024.48)
- Mukasheva, D., Tulkinbayev, N., Prilutskaya, M., Yessimova, D., & Stöver, H. (2024). Behind Bars: Understanding Prisoner Perception of Penitentiary Rehabilitation in Kazakhstan. *International Journal of Law, Crime and Justice*, 77, 100669. <https://doi.org/10.1016/j.ijlcrj.2024.100669>
- Penal Code of the Republic of Kazakhstan (2014). <https://adilet.zan.kz/eng/docs/K1400000226>
- Penal Code of Turkey (2004). [https://www.venice.coe.int/webforms/documents/default.aspx?pdfid=Ce=CDL-REF\(2016\)011-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdfid=Ce=CDL-REF(2016)011-e)
- Phillips, J. (2019). What Went Wrong with Attempts to Outsource Probation? Lessons from the Transforming Rehabilitation programme in England and Wales. *Archbold Review*, 7, 5-10.
- Probation of Offenders Act (1907). <https://www.irishstatutebook.ie/eli/1907/act/17/enacted/en/print.html>
- Rakhimova, G., Khamzina, Z., Aldabergenova, N., Buribayeva, M., & Buribayev, Y. (2023). Developing a System of Prevention of Offenses Committed by Juveniles: A View from Kazakhstan. *International Journal of Criminal Justice Sciences*, 18(2), 209-231. <https://doi.org/10.5281/zenodo.4756315>
- Recommendation CM/Rec(2010)1 of the Committee of Ministers to Member States on the Council of Europe Probation Rules (2010). <https://rm.coe.int/16800cc249>
- Resler, M., Ostapiuk, N., Tsiatkovska, O., & Bondar, M. (2025). The role of integrated reporting in improving the financial efficiency of the public sector. *Scientific Bulletin of Mukachevo State University. Series "Economics"*, 12(1), 50-60. <https://doi.org/10.52566/msu-econ1.2025.50>
- Resolution of the Kyrgyz Republic No. 297 "On Approval of the National Strategy for the Development of the Criminal Executive (Penitentiary) System of the Kyrgyz Republic for 2012-2016 years" (2012). <https://cbd.minjust.gov.kg/93585/edition/864356/ru>
- Rexha, B., Osmani, F., & Nimani, A. (2024). Importance of proper management of public finances in economic development. *Scientific Bulletin of*

- Mukachevo State University. Series "Economics", 11(2), 65-78.*
<https://doi.org/10.52566/msu-econ2.2024.65>
- Ruhland, E., Holmes, & B., Petkus, A. (2020). The Role of Fines and Fees on Probation Outcomes. *Criminal Justice and Behavior*, 47(10), 1244-1263.
<https://doi.org/10.1177/0093854820918877>
- Schaefer, L., & Brewer, S. (2022). Probation and Parole: From Control to Case Management. In E. Jeglic, C. Calkins (Eds.), *Handbook of Issues in Criminal Justice Reform in the United States* (pp.275-290). Cham: Springer. https://doi.org/10.1007/978-3-030-77565-0_15
- Semenenko, O., Kliat, Yu., Tsarynnyk, V., Yarmolchik, M., & Ovanesian, R. (2024). Personnel policy and defence economics: The relationship between efficiency and costs in the armed forces. *Scientific Bulletin of Mukachevo State University. Series "Economics", 11(4), 52-67.*
<https://doi.org/10.52566/msu-econ4.2024.52>
- Shadymanova, J., Musaeva, N., Orosaliev, E., & Omurakunova, C. (2023). 6 Kyrgyzstan: Social Work and Health in the Penitentiary System. In U. Pape, H. Stöver, & I. I. Michels (Eds.), *Social Work and Health in Prisons: Studies from Central Asia and China* (pp. 101-128). Baden-Baden: Nomos.
<https://doi.org/10.5771/9783748935988>
- Skinns, C. D. (2022). Probation. In *Conservative Government Penal Policy 2015-2021: Austerity, Outsourcing and Punishment Redux?* (pp. 209-257). Cham: Palgrave Macmillan. https://doi.org/10.1007/978-3-031-00797-2_5
- Soung, P. (2022). Is Juvenile Probation Obsolete? Reexamining and Reimagining Youth Probation Law, Policy, and Practice. *Journal of Criminal Law and Criminology*, 112(3), 549-591.
- State Program for the Development of the Criminal Executive (Penitentiary and Probation) System of the Kyrgyz Republic for 2024-2028 Years (2024).
<https://cbd.minjust.gov.kg/53-367/edition/20629/ru>
- Stróż, S., Kieliszek, Z., & Yaroshenko, O. (2023). European protection of Ukrainians during the martial law: The experience of Poland. *Foreign Affairs*, 33(4), 22-32. [https://doi.org/10.46493/2663-2675.33\(4\).2023.22-32](https://doi.org/10.46493/2663-2675.33(4).2023.22-32)
- Sutton, L. C. S., Dynevall, M., Wennerholm, J., Åhlén, S., Rugge, T., Bourgon, G., & Robertsson, C. (2021). Evaluation of the Implementation of a Risk-Need-Responsivity Service in Community Supervision in Sweden. *Criminal Justice and Behavior*, 48(5), 617-636.
<https://doi.org/10.1177/0093854820958744>

- Swedish Criminal Code (1962).
<https://www.government.se/contentassets/7a2dcae0787e465e9a2431554b5eab03/the-swedish-criminal-code.pdf>
- Tatikov, R., Baltabayev, K., & Drokin, Yu. (2025). Relevant problems of humanisation of the execution of liberty deprivation under the legislation of Kazakhstan: An international comparative analysis. *Social and Legal Studios*, 8(1), 20-32. <https://doi.org/10.32518/sals1.2025.20>
- Toktogazieva, S., Nogoibaeva, E. K., Steven, C. K., Mateeva, K., Kasybekova, K. (2020). Fair Trial Standards and Legitimacy of Criminal Justice Actors in Kyrgyzstan – A Research Note. *International Journal of Comparative and Applied Criminal Justice*, 44(1-2), 119-133. <https://doi.org/10.1080/01924036.2019.1587709>
- Turgumbayev, Y., Adlet, Y., Sabitova, A., Izbassova, A., & Beaver, K. M. (2022). Examining the Nexus Between Involvement in Crime and Delinquency and Being Processed Through the Criminal Justice System. *Journal of Crime and Justice*, 45(1), 120-133. <https://doi.org/10.1080/0735648X.2021.1890185>
- United Nations Office on Drugs and Crime. (2023). Global study on homicide 2023. https://www.unodc.org/documents/data-and-analysis/gsh/2023/Global_study_on_homicide_2023_web.pdf
- United Nations Standard Minimum Rules for Non-Custodial Measures (The Tokyo Rules) (1990). <https://www.ohchr.org/sites/default/files/Documents/ProfessionalInterest/tokyorules.pdf>
- Uulu, T. E. (2023). 11 Legal and Regulatory Frameworks of Social Work with Drug Users in Kyrgyzstan. In U. Pape, H. Stöver, & I. I. Michels (Eds.), *Social Work and Health in Prisons* (pp. 219-234). Baden-Baden: Nomos. <https://doi.org/10.5771/9783748935988>
- Uulu, T. E. (2024). *Sociological Analysis of the Peculiarities of Social Work with Drug Users in the Probation System of the Kyrgyz Republic*. Bishkek: Bishkek state university named after K. Karasayev.
- Zhakenov, K., Kultemirova, L., Ibraeva, A. (2024). Comparative Analysis of the Activities of Authorities to Ensure the Prevention of Offenses in the Republic of Kazakhstan and Other World Countries. *Security Journal*, 37, 1430-1446. <https://doi.org/10.1057/s41284-024-00425-5>
- Zhanozakova, L. T., Suleimanov, A. F., Amirov, N. K., Bekbaeva, A., & Urbisinova, N. (2024). Rights of Prisoners in the Republic of Kazakhstan: Legislation and Practice of its Implementation. *Kurdish Studies*, 12(1), 4526-4539. <https://doi.org/10.58262/ks.v12i1.326>

Zhetigenova, Z. K. (2020). On the Issue of Early Parole from Serving a Sentence in the Kyrgyz Republic. *International Penitentiary Journal*, 2(3), 176-181.
[http://dx.doi.org/10.33463/2712-7737.2020.02\(1-3\).3.176-181](http://dx.doi.org/10.33463/2712-7737.2020.02(1-3).3.176-181)