

Correctional Facilities and Coronavirus Endemic: Imperativeness of Rescuing Inmates in Nigeria

AKINTUNDE ABIDEMI ADEBAYO, ELIJAH ADEWALE TAIWO
Adekunle Ajasin University, Akungba-Akoko, Nigeria

Abstract. The outbreak of corona virus disease (COVID-19) has been declared a global pandemic by the World Health Organisation. Many people have tested positive to the disease, others are dead with many economies shutting down. Many countries have also been placed on lock down so as to prevent the further spread of the disease. Given the vulnerability of inmates and personnel of correctional service or detention facilities to the outbreak COVID-19, there are legitimate concerns about their health and lives. Persons in correctional or detention facilities are particularly exposed considering the overcrowding and unhygienic conditions of such facilities in many countries. Notwithstanding that governments are obliged to provide good health care to their citizens including inmates in line with relevant international standards, there is the outbreak of the disease in many facilities around the world. Although, so far, no a single case of COVID-19 has been recorded in any correctional facility in Nigeria, but the emergency of the virus in some towns and cities in Nigeria calls for serious attention. In order to stem the spread of the virus to correctional facilities, the paper recommends, among others, the isolation/restriction of movement of suspected cases within the facility, banning of visits to detention facilities, decongestion of correctional facilities and setting up of disease prevention and control units in correctional or detention facilities across the country.

Keywords: *Health Care, Human Rights, COVID-19, Correctional or Detention Facility, Government.*

1. Introduction

The spread of coronavirus is the most serious global health security threat in decades. There is over 341,722 confirm cases with about 14,765 deaths

recorded globally. According to the Nigeria Centre for Disease Control (NCDC), about 46 cases have been confirmed in Nigeria with figure rising with additional discovery on a daily basis. According to the World Health Organisation (WHO), “corona viruses are a large family of viruses that cause illness ranging from the common cold to more severe diseases such as Middle East Respiratory Syndrome (MERS-CoV) and severe acute Respiratory Syndrome (SARS-CoV).”

Corona Virus Disease (COVID-19) was discovered for the first time in China in December, 2019. These viruses are said to be zoonotic in the sense that they are transmitted between animals and people. Some of the common symptoms of the disease include, fever, cough, breathing difficulties, just to mention a few. In extreme cases, pneumonia, kidney failure, acute respiratory syndrome and even death may result. Given its deadly effect, many countries are imposing much-needed restrictions to slow the spread of COVID-19. It has been recommended that, to contain the spread of the disease, individuals are advised to wash their hands regularly, avoid close contact with anyone showing any of the afore-mentioned symptoms, work from home if possible, avoid events with large groups and cover mouth and nose when sneezing or coughing.

The World Health Organization in a media briefing on 11 March 2020 declared COVID-19 as pandemic given its wide spread at very alarming rate. The largest number of cases, representing more than 90 per cent has been in China, where it was first detected with 81,000 cases, followed by Italy, Iran and Republic of Korea, with between 8,000 and 24,000 cases respectively. It is predicted that the number of death or affected countries may increase in the

coming weeks. So far, prominent figures who have been infected by the virus include, Sophie Gregoire Tudeau (wife of Canadian Prime Minister), Hollywood actor, Tom Hanks and wife, British actor, Idria Elba, among others. Even in Nigeria, the Chief of Staff to the President, Abba Kyari and the Governor of Bacuhi State are among the confirmed cases. Therefore, the WHO has called on States to take urgent measures to prevent the further spread of the disease.

Drastic measures to contain the disease have been seen in places like China and Italy where there have been total lock down of human activities and restriction in the movement of residents. Similarly, many other States have also taken steps to prevent the further spread of the disease through various strict measures. Some have put in place policies banning gatherings of over 1,000 people; some have closed their borders, holding people in isolation after returning from affected countries or cities, encouraging self-isolation, among others. Singapore and Nigerian governments for instance have issued travel advisories against non-essential travel abroad and restriction on travellers coming into their countries and closure of schools and work at home policy.

2. COVID-19 in Nigeria

Nigeria recorded its first case of coronavirus around 27th February 2020. This was confirmed by the Nigeria Centre for Disease Control. The number keeps on rising daily. The victim, an Italian national was said to have travelled from Northern Italy to Lagos, Nigeria and subsequently to Ogun State in Western Nigeria. The said man has since been isolated and treated. Those who had contact with the index were traced. By 9th March 2020, 27 cases were traced and identified across five states (Edo, Lagos, Ogun, the Federal Capital Territory and Kano) of the federation of which only one of them tested positive. Others are being followed up with.

As of Wednesday, 18th March, 2020, Nigeria had confirmed eight cases of coronavirus in Nigeria. Before then, there were only three confirmed cases. The Minister of Health, Osagie Ehanire in a press briefing in Abuja confirmed that of the five additional cases, three of them were from the United States while two are from the United Kingdom. Four cases are in Lagos while one is in Ekiti. As at the time of writing, Nigeria has recorded 46 confirm cases of CONVID-19. Also, the Federal Government of Nigeria on 18th March 2020 through a press briefing by its Secretary to the Government of the

Federation, Boss Mustapha, announced ban on travel to 13 countries namely that are considered hotspots of COVID-19 namely; USA, United Kingdom, China, France, Japan, Iran, Switzerland, Norway, Netherlands, South Korea, Germany, Italy and Spain.

At the moment, federal government of Nigeria in its bid to contain the spread of the virus has issued travel ban, deployed high quality surveillance and temperature screening equipment at the airports and land borders, collection of travellers' information, interviewing travellers who departed from or passed through the COVID-19 hotspots, among others. Similarly, the Federal Government has ordered that the compulsory camp and orientation course for young graduates under the National Youth Service Corp (NYSC) be closed abruptly to contain the possible spread of the disease. Further, it also ordered all schools, from primary to tertiary levels to be closed till further notice to prevent the spread of COVID-19. In the same vein, the National Assembly of the Federal Republic of Nigeria and the respective Houses of Assembly across the 36 States have also suspended public sittings and plenary until further notice.

3. COVID-19 in Correctional or Detention Facilities

So far, some countries have confirmed cases of COVID-19 in places of detention. In China, more than 806 cases have been confirmed in various prisons. Officials revealed that a specialist hospital and inspection team had been organised to visit and test inmates in prisons. Some officials of the prisons have been accused of lapses and complicity in the outbreak of the disease in the concerned prison facilities. It was alleged that some prison officials who were in contact with persons from COVID-19 hotspots in the country were not truthful in their contact history report thereby resulting in incomplete quarantine. Infected prison officials wittingly and unwittingly brought the disease to work and consequently leading to the outbreak of the disease among inmates. Following the incident, many officials have been dismissed while the government is striving to improve on disease control within the prison system.

In Italy, it is reported that about 12 inmates have died in over 20 prisons across the country. The deaths were as a result of riots which were triggered by restrictions and change in rules in view of COVID-19 outbreak. The change in prison rule entailed, suspension of family visit and attempt to restrict contact of inmates with members of the society. The

entire country has now been placed on lock down to prevent further spread of the disease. For instance in the United State of America, it is reported that three inmates have tested positive for the coronavirus in Georgia, raising concerns that the pandemic could spread within tight prison quarters nationwide. In Alabama, the Department of Corrections reported that an administrative employee tested positive for the virus and everyone that had contact with the employee has been put on self-quarantine for 14 days.

It has been reported that COVID-19 is fast spreading among inmates in Iranian prisons. This ugly development has led to the government releasing temporarily about 85, 000 inmates from its overcrowded and disease ridden prison facilities to prevent further outbreak of COVID-19. To qualify for the temporary release, an inmate has to test negative for COVID-19 and post bail and with priority for persons with inherent health problems. In Scotland, two positive cases of COVID-19 have been reported. The affected cases were isolated and those showing symptoms were also advised to self-isolate themselves for a while.

4. COVID-19 in Correctional or Detention Facilities in Nigeria

It appears that while the Nigerian government and members of the society are scampering for safety and putting up precautionary measures to prevent and contain the spread of COVID-19, not much consideration has been given to the health and lives of inmates in correctional facilities despite that they are vulnerable to the outbreak of the disease. At best, the Senate of the Federal Republic of Nigeria has recommended the immediate clean-up and fumigation of correctional or detention facilities in the country.

Fortunately, as of now, no case of COVID-19 has been reported yet in any of the correctional facilities in Nigeria. There are about 250 of such facilities across the country. Correctional facility was formerly called "prison." It is no longer news that, over the years, the provision of welfare services to inmates in Nigerian correctional or detention facilities has been far below satisfactory as many facilities have failed to meet up with the minimum standard for the treatment of prisoners, particularly in the areas of feeding, allocation of accommodation, privacy, adequate lighting, medical services, and water. Others include intense shortage of drugs, ambulances in prison clinics leading to high incidence of epidemics, high mortality rates among prisoners; diversion of funds meant for feeding prisoners into

the hands of prison personnel thereby resulting in hunger and malnutrition of inmates.

For instance, a facility meant to accommodate 800 inmates now holds over 4, 000 inmates in Nigeria. Therefore, considering the overcrowding, unhealthy, unhygienic and inhumane environment of correctional or detention facilities in Nigeria, they are highly vulnerable to the outbreak of COVID-19. It is on record that as of 13 January 2020, there were a total of 72, 627 inmates in Nigerian correctional or detention facilities. About 50, 737 (70%) of the entire prison population are pre-trial detainees while over 21, 890 (30%) are convicts. Outside, government is advocating social distancing as one of the measures to curtail the spread of the virus. However, this is not possible for the inmates, especially in overcrowded prisons as in Nigeria. In prison, there are too many people in proximity to each other who do not have the option of social distancing being advocated. Given that social distancing is not an option for the inmates or detainees, jail or detention could become an incubator and death sentence for them. This calls for urgent action on the part of the Nigerian government.

The Senate of the Federal Republic of Nigeria has ordered the immediate clean-up and fumigation of correctional or detention facilities in the country in a bid to prevent the outbreak of COVID-19 in correctional or detention facilities in Nigeria. The senate also stresses the need to upgrade and decongest the correctional or detention facilities so as to prevent the outbreak of COVID-19 in the facilities across the country.

Though there is no case of COVID-19 in correctional or detention facilities in Nigeria yet, it appears that the authorities of these facilities are not prepared to tackle the outbreak of the disease. There is, therefore, the urgent need for government of Nigeria and the authorities of the correctional or detention facilities to combat COVID-19 by improving on their disease prevention and control strategies. In addition to that, something must also be done about overcrowding and find ways to improve on the unhealthy, unhygienic and inhumane environment of correctional or detention facilities in Nigeria.

5. Right of Inmates to Health and Hygiene in Correctional facilities

Every human being has the right to the highest attainable standard of physical and mental health under international human rights law. The moment a State deprives anyone of his/her liberty, it takes

responsibility for the physical and mental health and well-being of such a detained person as in line with the international standard stipulated in instrument such as the United Nations Standard Minimum Rules for the Treatment of Prisoners (the Mandela Rules). The Nelson Mandela Rules provide guidelines for domestic law for citizens held in prisons and in other forms of custody. They have been of great importance and a reference point for relevant national legislation as well as of practical guidance for prison management. It recommends, among other things, promoting the health and well being of prisoners, the need for member states to try as much as possible to reduce prison congestion by resorting to non-custodial measures as alternatives to pre-trial detention, reinforce alternatives to imprisonment, promote access to justice, and allocating adequate human and financial resources to improve the prison conditions.

Similarly, there is the United Nations Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders (the Bangkok Rules). This body of Rules was informed by the need to put in a global standard with regards to the treatment of women offenders and prisoners. It encourages member States to implement the rules which are the standard minimum conditions acceptable by the United Nations in the treatment of women offenders and prisoners as well as criminal justice administration and take steps to integrate them into their national laws. Therefore, the duty of the State to provide highest attainable standard of physical and mental health is important bearing in my mind that, inmates in correctional or detention facilities have no other option but to rely on the authorities for the protection of their health and well-being.

The government, therefore, must ensure it provides necessary health care services to the inmates in correctional or detention facilities, tackle diseases and malnutrition, provide safe drinking water, ensure quality health care for inmates. It has been observed that many authorities have failed when it comes to the realisation of this right. Most inmates do not have access to health care; some of them in the process develop very dangerous diseases while others who are unlucky die. They are forced to live in very unhygienic environment.

The magnitude of infection from diseases, drug abuse and dependency as well as mental illness among inmates in detention is much higher than in the community. Most of the inmates usually are from impoverished communities where they may have

been exposed to transmissible diseases and malnutrition, and their access to good quality health services would have been limited. Others may have neglected their health or may not have paid adequate attention to their health prior to their incarceration. Therefore, transmissible diseases such as, tuberculosis, influenza are a particular concern, considering the overcrowding nature of most correctional and detention facilities in Nigeria. Other than that, inmates have high propensity to be HIV positive than persons in the free society thereby, putting the lives of both inmates and staff at risk.

Despite the fact that many international human rights laws require that healthcare in correctional or detention facilities should be of high standard, just as it is obtainable in the community, the unfortunate reality in many countries is that, it is not so. This has become precarious with the outbreak of COVID-19 which is now a global pandemic. Correctional facilities in Nigeria are not exemptions. The basic protective measures issued by the WHO including washing of hands frequently and avoiding bodily contact with others cannot be observed in many correctional or detention facilities because there are no provisions and infrastructure available to observe them. Bodily contact for instance cannot be avoided in a facility that is overcrowded. Regular access to water, soap, hand sanitizer to maintain hygiene can be constricted in detention. Again, covering of mouth and nose while sneezing is also suggested as preventive measure, however, it will be extremely difficult, if not impossible for inmates in handcuffs to cover their mouth when coughing or sneezing so as to prevent the spread of COVID-19. With this precarious condition across the Nigerian prisons, not only the inmates are at danger, but also, the staff (by extension the entire public as staff of correctional service are potential carriers) as they would have contacts with the inmates.

6. Recommendations

In view of the foregoing, and in order to curtail the spread of the virus, the following recommendations become necessary.

(a) There is the urgent need for the Nigerian government and the authorities of the correctional or detention facilities to improve on the disease prevention and control strategies in correctional and detention facilities across the country. Government should urgently do something about overcrowding facilities in the prisons and find ways to improve on the unhealthy, unhygienic and inhumane environment of correctional or detention facilities in the country.

(b). In case of facilities that house infected inmates, it is recommended that there should be restriction of movement thereto, urgent quarantine and isolation of any inmate who exhibits any of the symptoms of the disease or test positive to the disease so as to contain the further spread of the disease within the correctional or detention facilities. During a quarantine or isolation, there should be clear communication by facility authority on how food, medicines, drinks, sanitary materials, among others should be provided to inmates.

(c) It is also recommended that government and relevant authorities should step-up disease control measures to ensure that there is no outbreak of COVID-19 in the respective prison and detention facilities. It is also recommended that government should provide adequate protective equipment in all detention and correctional facilities in Nigeria.

(d). Again, there is the need for authorities of correctional and detention facilities to restrict and monitor visits to their facilities at this critical time. This is to reduce likelihood of exposing inmates to possibly infected persons who may be visiting prison facilities. This measure has been imposed in correctional and detention facilities in different countries such as, Italy, Philippines, Hungary, England, and it proved to be a good one, as such, same is commended for Nigeria too.

(e). There is the need to regularly monitor the health condition of all the staff of correctional and detention facilities. These personnel provide security and supervision in the facilities with contact with inmates as schedules of their work required. Since these persons also have regular contact with the public and their immediate environments, they must be regularly examined and checked to ensure that they are free of the virus. In the same vein, staff of the various correctional services should be adequately trained on preventive measures.

(f) Steps must be taken to reduce the number of person in detention at a critical time like this as this will help to lower the risk of COVID-19 infection or death for persons in detention, including prison staff. The courts are, therefore, enjoined to reduce the number of pre-trial detention at this emergency period and explore more of non-custodial measures for simple offences and misdemeanours. Also, the government may consider temporary release to inmates who are not considered to pose serious security risk to the society, just like it was done in Iran.

(g) In the same vein, law enforcement officers should refrain from arbitrary or unnecessary arrest so as not to unnecessarily swell the prison/detention facilities' population. Also, one may not be too sure of who the

carrier of the virus is as there are no adequate facilities in Nigeria to detect the virus.

(h) To ensure compliance with the various directives of governments to prevent the spread of the disease, there must be punitive measures in place. This has been experimented in countries such South-Korea, Bahrain, Russia, where people are liable to punishment for violating established measures to protect the society from the spread of COVID-19. The federal government of Nigeria has banned travel to COVID-19 hotspots countries, directed that travellers coming into Nigeria through the airports and land borders be subjected to screenings. Further, some States, such as Lagos, Ogun, Ondo, Oyo among others have banned gathering in public places in order to prevent the spread of the diseases. However, no punitive measure has been pronounced for non-compliance with the preventive directives yet. There is need for governments in Nigeria to criminalise non-compliance with stated measures to prevent the spread of COVID-19 and to protect corporate existence of the society.

(i) There should be enlightenment, public awareness and campaigns about the new virus and the precautionary measures to prevent and contain its spread. This should be done on the television, radio, social media platforms and print media so as to have wide circulation.

7. Conclusion

In view of the outbreak of COVID-19 in many countries, it is imperative to protect inmates in correctional and detention facilities. Their rights to health and hygiene must be protected by governments. For country such as Nigeria that has not yet recorded any case of COVID-19 in its correctional or detention facilities, steps must be taken to prevent its outbreak in such facilities. With regards to countries whose correctional or detention facilities have already recorded positive cases of COVID-19, measures must be put in place to contain further spread while infected inmates must be quarantined and properly treated. It is hoped that if the recommendations listed above are followed religiously, the epidemic will soon be a thing of the past.

References

“Corona Virus” available online at <https://www.who.int/health-topics/coronavirus> (accessed 17 March 2020).

- “Coronavirus (COVID-19)” available online at <https://www.nhs.uk/conditions/coronavirus-covid-19/> (accessed 17 March 2020).
- “WHO Director-General’s opening remarks at the media briefing on COVID-19” - 11 March 2020, available online at <https://www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19---11-march-2020> (accessed 17 March 2020).
- “Coronavirus Pandemic: Which Politicians and Celebs are affected?,” available online at <https://www.aljazeera.com/news/2020/03/coronavirus-pandemic-politicians-celebs-affected-200315165416470.html> (accessed 17 March 2020).
- “Coronavirus Disease 2019 (COVID-19) - Schools, Workplaces and Community Locations,” available online at <https://www.cdc.gov/coronavirus/2019-ncov/community/index.html> (accessed 17 March 2020).
- “Coronavirus (COVID-19) -Print ads-Simple steps to stop the spread,” available online at <https://www.health.gov.au/resources/publications/coronavirus-covid-19-printt-ads-simple-steps-to-stop-the-spread> (accessed 16 March 2020).
- “Additional Precautionary Measures to Prevent Further Importation of COVID-19 Cases,” available online at <https://www.moh.gov.sg/news-highlights/details/additional-precautionary-measures-to-prevent-further-importation-of-covid-19-cases> (accessed 16 March 2020).
- “Nigeria Centre for Disease Control, COVID-19 outbreak in Nigeria: situation report, March 9, 2020,” available online at <https://ncdc.gov.ng/diseases/sitreps/?cat=14&name=An%20update%20of%20COVID-19%20outbreak%20in%20Nigeria> (accessed 17 March 2020).
- Ebenso, B and Otu, A., “Can Nigeria contain the COVID-19 outbreak using lessons from recent epidemics?” *THE LANCELET Global Health* (2020) available online at [http://doi.org/10.1016/s2214-109X\(20\)30101-7](http://doi.org/10.1016/s2214-109X(20)30101-7) (accessed 18 March 2020).
- Oluchi, O., “COVID-19: FG Confirms Five New Cases in Nigeria,” available online at <https://www.channelstv.com/2020/03/18/breaking-covid-19-fg-confirms-five-new-cases-in-nigeria/> (accessed 18 March 2020).
- Editor, “COVID-19: Nigerian government imposes travel ban on 13 countries from March 21,” available online at <https://www.ripplesnigeria.com/breaking-covid-19-nigerian-govt-imposes-travel-ban-on-13-countries-from-march-21/> (accessed 18 March 2020).
- Ebenso, B and Otu, A., “Can Nigeria contain the COVID-19 outbreak using lessons from recent epidemics?” *THE LANCELET Global Health* (2020) available online at [http://doi.org/10.1016/s2214-109X\(20\)30101-7](http://doi.org/10.1016/s2214-109X(20)30101-7) (accessed 18 March 2020).
- NAN, “We rushed orientation programmes over Coronavirus fears - NYSC,” *Punch Newspaper* of 18 March 2020, available online at <https://punchng.com/we-rushed-orientation-programmes-over-coronavirus-fears-nysc/> (accessed 18 March 2020).
- Agency Report, “COVID-19: FG Orders Closure of Unity Schools,” *Premium Times Newspaper* of 19 March 2020, available online at <https://www.premiumtimesng.com/news/top-news/382795-covid-19-fg-orders-closure-of-unity-schools.html> (accessed 19 March 2020).
- Tabiowo, E., “COVID-19: Senate Suspends Hearings, Shuts Public Gallery,” *National Assembly News Post*, available online at <https://www.nassng.org/news/item/1463> (accessed 19 March 2020).
- Zi, Y., “Cracks in the System: COVID-19 in Chinese Prisons,” *The Diplomat Newspaper* of 9 March 2020, available online at <https://thediplomat.com/2020/03/cracks-in-the-system-covid-19-in-chinese-prisons/> (accessed 18 March 2020).
- Mahbubani, R., “Chinese jails have become hotbeds of coronavirus as more than 500 cases have erupted, prompting the ouster of several officials,” *Business Insider Newspaper* of 21 February 2020, available online at <https://www.businessinsider.com/500-coronavirus-cases-reported-in-jails-in-china-2020-2?amp#aoh=15845433565585&referrer=https%3A%2F%2Fwww.google.com&tf=From%20%251%24s> (accessed 18 March 2020).
- Euronews and AFP, “Death toll rises in Italian Prisons as inmates riot over COVID-19 rules,” available online at <https://www.euronews.com/2020/03/09/six-dead-as-coronavirus-restrictions-trigger-italy-prison-riots> (accessed 17 March 2020).

- “Three Inmates Test Positive for Corona virus in Georgia” *Tribune Newspaper*, Mar 23, 2020 available Tribune online (accessed on 23 March, 2020).
- Gillespie, T., “Coronavirus: Iran frees 85, 000 prisoners to combat spread of infection,” Sky News of 17 March 2020, available online at <https://news.sky.com/story/coronavirus-iran-frees-85-000-prisoners-to-combat-spread-of-covid-19-11958783> (accessed 18 March 2020).
- Salmond, C., “Coronavirus in Scotland: Two Prisoners test positive to COVID-19” *The Scotsman*, 19 March 2020, available <https://www.scotsman.com/health/coronavirus/coronavirus-scotland-two-prisoners-test-positive-covid-19-2502066> (accessed 19 March 2020).
- Fadare, T., “COVID-19: Senate Urges upgrade and decongestion of correctional or detention facilities,” *Order Paper* of 17 March 2020, available online at <https://www.orderpaper.ng/covid-19-senate-urges-upgrade-decongestion-of-correctional-centers/> (accessed 19 March 2020).
- Ayado, S., “COVID-19: Senate seeks immediate clean-up, fumigation of Nigerian Prisons,” *Business day Newspaper* of 17 March 2020, available online at <http://www.businessday.ng/news/article/covid-19-senate-seeks-immediate-clean-up-fumigation-of-nigerian-prisons/> (accessed 18 March 2020).
- United Nations Standard Minimum Rules for the Treatment of Prisoners (The Mandela Rules), Rule 31; Chijioke, J., “Nigerian Prisons System needs Reform” *Daily Post Newspaper* (Lagos, 18 March 2020) <<http://dailypost.ng/2017/06/06/nigerian-prisons-system-needs-reform-kemi-olunloyo/>> (accessed 18 March 2020).
- Odeyemi, J. & Bivan, N., “Prison Break Galore: Why Jailbreaks Persists in Nigeria” *Daily Trust Newspaper* (Abuja, 20 August 2016) <<http://www.dailytrust.com.ng/news/general/prison-break-galore-why-jailbreaks-persist-in-nigeria/159623.html>> (accessed 18 March 2020).
- Adebayo, A.A., “Efficacy of Non-Custodial Sentences in the Administration of Criminal Justice in Nigeria,” being unpublished Ph.D thesis submitted to the Faculty of Law, Adekunle Ajasin University, Akungba-Akoko, Nigeria in January 2019, 3-4.
- Fadare, T., “COVID-19: Senate Urges upgrade and decongestion of correctional or detention facilities,” *op.cit.*
- Agbator, A.I., “Non-Custodial Sentence as a Means of Prison Decongestion in Nigeria,” available online at <https://thefirmaadvisory.com/new-blog/2020/1/17/non-custodial-sentence-as-a-means-of-prison-decongestion-in-nigeria> (accessed 18 March 2020); World Prison Brief Data - Nigeria, available online at <https://www.prisonstudies.org/country/nigeria> (accessed 18 March 2020).
- Ayado, S., “COVID-19: Senate seeks immediate clean-up, fumigation of Nigerian Prisons,” *op.cit.*
- Resolution A/RES/70/175 was adopted by the General Assembly of the United Nations on 17 December 2015.
- Epstein, R., “The Nelson Mandela Rules: International Standards for the Treatment of Prisoners” <<http://www.criminallawandjustice.co.uk/features/Nelson-Mandela-Rules-International-Standards-Treatment-Prisoners>> (accessed 2 June 2017).
- “United Nations Standard Minimum Rules for the Treatment of Prisoners (the Mandela Rules),” Resolution A/RES/70/175 was adopted by the General Assembly of the United Nations on 17 December 2015, General Comment No. 21 on humane treatment of persons deprived of their liberty, 9.
- “United Nations Nelson Mandela Rules (Revised SMR)” by Penal Reform International, available online at <https://www.penalreform.org/issues/prison-conditions/standard-minimum-rules/> (accessed 23 March 2020).
- Adopted by the Resolution of the General Assembly A/RES/65/229 on 22 December 2010.
- “UN Bangkok Rules” by Penal Reform International, available online at <https://www.penalreform.org/issues/women/bangkok-rules-2/> (accessed 22 March 2020).
- Enggist, S., Møller, L., Galea, G., and Udesen, C., “Prisons and Health,” World Health Organisation (WHO) Document, p. 2, available online at http://www.euro.who.int/_data/assets/pdf_file/0005/249188/Prisons-and-Health.pdf (accessed 18 March 2020).
- Araromi, M.A., “Prisoners Rights under the Nigerian Law: Legal Pathways to Progressive Realization and Protection” (2015) *Afe*

- Babalola University Journal of Sustainable Development, Law and Policy*, 6 (1), 170, 177-179.
- Enggist, S., Møller, L., Galea, G., and Udesen, C., *Prisons and Health*, World Health Organisation (WHO) Document, *op.cit*, 107-109.
- “Human Rights Dimension of COVID-19 Response, *Human Rights Watch* of 19 March 2020,” available online at <https://www.hrw.org/news/2020/03/19/human-rights-dimensions-covid-19-response> (access 19 March 2020).
- Odeyemi, J. and Bivan, N., “Prison Break Galore: Why Jailbreaks Persists in Nigeria” *Daily Trust Newspaper* (Abuja, 20 August 2016) < <http://www.dailytrust.com.ng/news/general/prison-break-galore-why-jailbreaks-persist-in-nigeria/159623.html>> (accessed 18 March 2020); Rogan, M., “Prison Inspection and Monitoring: The Need to Reform European Law and Policy,” *Eur J Crim Policy Res* (2019) <http://doi.org/10.1007/s10610-019-09420-8>.