



MONITORING BOARDS REPORT

2025





About Us

The Civil Society in the Penal System Association (CİSST) was founded in 2006 to protect the rights and freedoms of prisoners in prisons, which are among the places at greatest risk of human rights violations, and to bring prisons into line with international human rights standards and human dignity in terms of rights, conditions and practices.

Supporters

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Prepared by

Heval Zelal Avcı, Melis Gebeş

Design

Ahmet Soykarcı

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List of Abbreviations

CİSST	Civil Society in the Penal System Association
CPT	European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment
DGPĐH	Directorate General of Prisons and Detention Houses
HRC	Human Rights Inquiry Commission of the Grand National Assembly of Türkiye
HREİT	Human Rights and Equality Institution of Türkiye
MoJ	Ministry of Justice
MPİDBs	Monitoring Boards of Penal Institutions and Detention Houses
NGO	Non-governmental organisation
NHRİs	National human rights institutions
Oİ	Ombudsman Institution
PCC	Presidential Communication Center
PDHRBs	Provincial and District Human Rights Boards
TMA	Turkish Medical Association
UNCAT / OPCAT	United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment / Optional Protocol

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Introduction

The Civil Society in the Penal System Association (CISST) submits applications to public institutions with responsibilities and powers relating to the protection of human rights in prisons, based on requests, complaints and allegations of human rights violations received from prisoners and their relatives, as part of its monitoring and evaluation work. Through these applications, CISST requests that the alleged violations brought to its attention be investigated and examined, and that necessary action be taken to remedy any violations identified. It also calls on mechanisms with the authority to conduct on-site monitoring in prisons to examine these allegations through prison visits and to report on their findings.

This report assesses the applications submitted by CISST throughout 2025 to mechanisms responsible for monitoring and oversight of the human rights situation in prisons in Türkiye, as well as the responses received. Drawing on CISST's applications, the report examines how the relevant institutions address allegations of human rights violations in prisons and how effectively these processes operate. In this context, it seeks to assess the effectiveness of existing monitoring and oversight mechanisms in investigating alleged violations, bringing violations to light and contributing to remedies for those affected.

Methodology

This report covers the period from [1 January to 31 December 2025](#) and is based on an analysis of [5,880 applications](#) submitted by CISST to relevant authorities concerning allegations of human rights violations reported by prisoners and their relatives, as well as [439 responses](#) received to these applications.

CISST submitted these applications to the relevant authorities, primarily the Ministry of Justice (MoJ); the Directorate General of Prisons and Detention Houses (DGPDH); the Human Rights Inquiry Commission of the Grand National Assembly of Türkiye

(HRC); Provincial and District Human Rights Boards (PDHRBs); Monitoring Boards of Penal Institutions and Detention Houses (MPIDBs); the Presidential Communication Center (PCC); and the Ombudsman Institution (OI). Depending on the content of the applications and the nature of the alleged violations, applications were also submitted to other relevant bodies, including the Ministry of Health, the Turkish Medical Association, bar associations, and foreign consulates.

The applications were based on requests, complaints, and allegations of human rights violations communicated to CİSST by prisoners held in closed and open prisons, as well as by prisoners' relatives. The data used in preparing this report were obtained through letters sent to CİSST by prisoners, information provided by prisoners and their relatives through CİSST's Prisoner Helpline, statements made by prisoners to lawyers during prison visits, and face-to-face interviews with prisoners' relatives. This information was collected and systematically classified using a dedicated database developed by CİSST.

The data used in this report were drawn from CİSST's database. In addition to prisoners' personal information, the database records requests, complaints, and allegations of human rights violations communicated to CİSST by prisoners and their relatives through letters and telephone calls. These allegations are classified thematically, while applications subsequently submitted by CİSST to the relevant institutions and the responses received are entered into the system and archived. The findings presented in this report are based on an analysis of the data collected through the methods described above and the classifications used in CİSST's database.

This report focuses primarily on applications submitted to the MPIDBs and PDHRBs, as these bodies are authorised to conduct on-site monitoring of prisons, as well as the responses received to these applications. The assessment considers not only the number of responses, but also their content, including whether information was requested from the relevant institutions, whether a prison visit was conducted, whether the prisoner was interviewed, and whether a violation was identified.

The HRC also conducts monitoring activities from time to time in prisons where allegations of human rights violations and complaints are particularly concentrated.

However, it does not generally conduct on-site monitoring directly in response to individual applications submitted to it. For this reason, although applications submitted to the HRC are assessed in the report, its monitoring activities are given limited consideration.

The report also examines CİSST's applications to the Ministry of Justice, the DGPDH, and the PCC, which do not have a mandate to conduct on-site monitoring but play an important role in addressing allegations of human rights violations concerning prisoners, as well as the responses provided by these institutions. In addition, the report examines applications submitted by CİSST to the Ombudsman Institution (OI) and the decisions issued by the OI in response to these applications.

The report draws on the Paris Principles, which are widely recognised as a key reference framework for assessing the effectiveness of national human rights institutions (NHRIs) and the independence and pluralism of bodies monitoring places of detention. The Paris Principles, formally known as the Principles relating to the Status of National Institutions for the Promotion and Protection of Human Rights, were adopted by the United Nations Commission on Human Rights through Resolution 1992/54 of 3 March 1992 and endorsed by the United Nations General Assembly through Resolution 48/134 of 20 December 1993. The Paris Principles set out standards concerning the structure and functioning of NHRIs and provide a basis for their legitimacy and credibility. Compliance with the Paris Principles is therefore one of the key criteria for assessing the effectiveness of NHRIs.

This report covers only applications made on behalf of prisoners who were able to reach CİSST and who consented to having their allegations of human rights violations referred to the relevant institutions. A range of factors may prevent prisoners from communicating their complaints to CİSST even when they are aware of the organisation, including restrictions on communication in prisons, prisoners' financial circumstances, high postage costs, literacy levels, and the level of awareness of CİSST among prisoners. Another factor is prisoners' fear of what they describe as "retaliation", namely that filing complaints against prison administrations may lead to a further deterioration of their conditions of detention. CİSST's Prisoner Helpline, which prisoners' relatives can contact free of charge, is an important means of addressing these barriers to access.

Overview

Between 2016 and the end of 2025, CİSST submitted applications to relevant authorities, primarily the Ministry of Justice (MoJ), the Directorate General of Prisons and Detention Houses (DGPDH), the Presidential Communication Center (PCC), the Human Rights Inquiry Commission of the Grand National Assembly of Türkiye (HRC), the Human Rights and Equality Institution of Türkiye (HREIT), Provincial and District Human Rights Boards (PDHRBs), Monitoring Boards of Penal Institutions and Detention Houses (MPIDBs), and the Ombudsman Institution (OI), as well as other bodies including the Ministry of Health, the Turkish Medical Association, bar associations, and consulates, totalling **38,107 applications**.

The distribution of applications over the past five years is presented below:

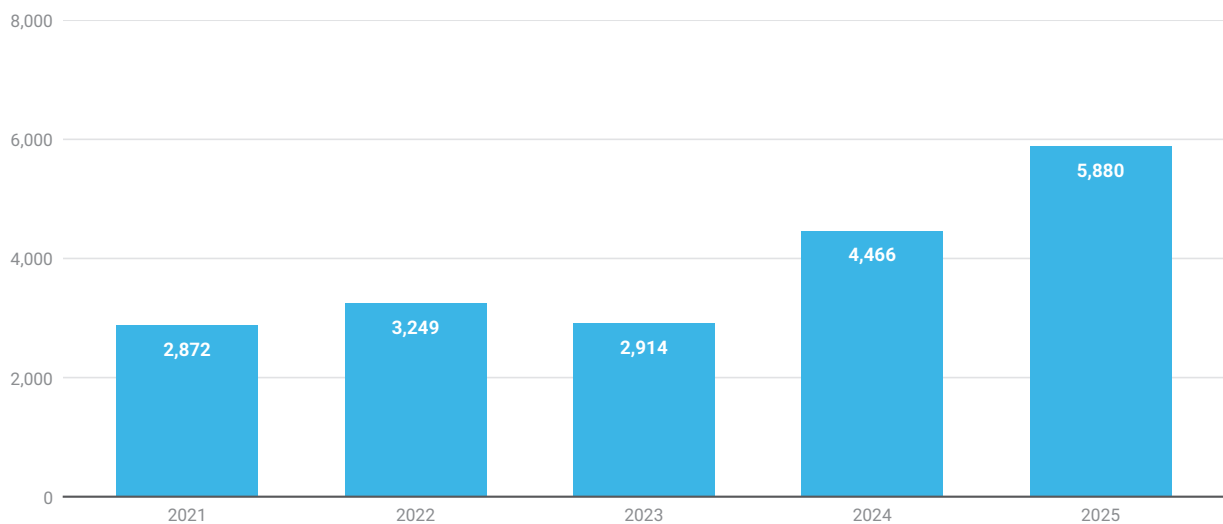
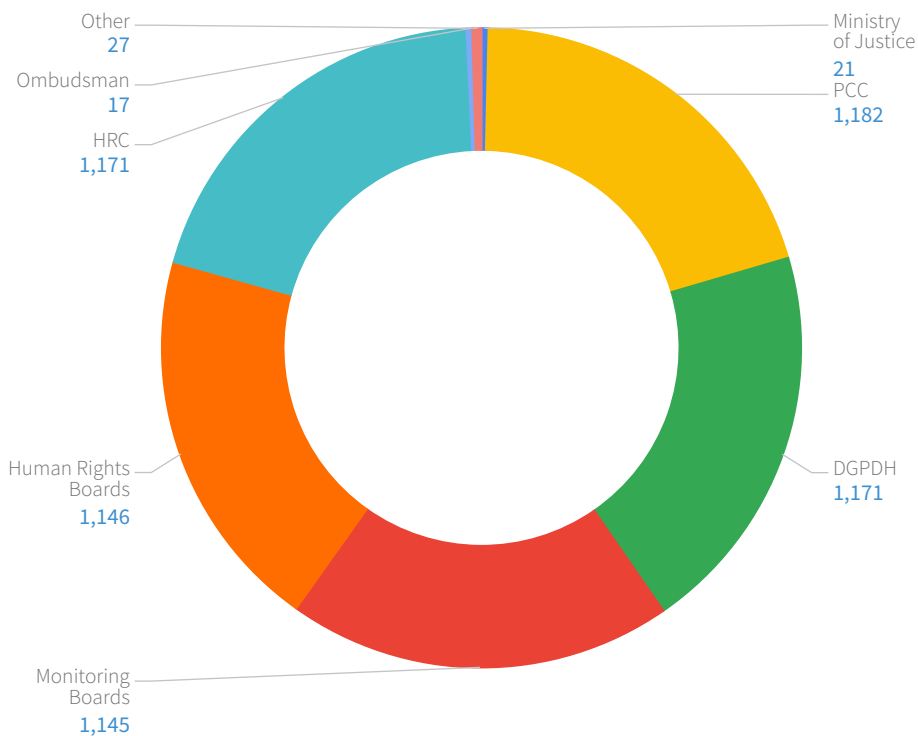


Chart 1: Distribution of applications over the past five years

The annual number of applications increased from 2,872 in 2021 to 5,880 in 2025, more than doubling over the five-year period. The increase in 2022 is considered to have been influenced by the continued enforcement of restrictions introduced during the COVID-19 pandemic, alongside growing complaints concerning increasingly severe prison overcrowding and conditions in S-type, Y-type, and high-security prisons opened

after 2020. The decline in applications in 2023 is thought to be partly attributable to prisoners' financial difficulties and rising postage costs, which made it harder for them to contact CİSST. From 2024 onwards, CİSST's ability to reach more prisoners and their relatives through its Prisoner Helpline also contributed to the increase in applications. However, it is important to note that increases or decreases in the number of applications do not necessarily reflect the full extent of human rights violations in prisons¹. Furthermore, the same allegation of a rights violation may be referred to multiple authorities with different mandates and powers. Accordingly, the figures presented here represent the total number of applications submitted by CİSST to the relevant authorities, rather than the number of distinct allegations of rights violations.

The distribution of applications submitted in 2025 by institution is presented below:



Graphic 1: Distribution of applications submitted in 2025 by institution

The decrease in applications submitted to the MoJ, from 540 in 2024 to 21 in 2025, resulted from a change in CİSST's application procedure. As applications submitted

¹ For detailed information on human rights violations in prisons and the problems faced by prisoners with special needs, see the prison reports prepared by CİSST at <https://cisst.org.tr/kategori/yayinlar/>.

to the Ministry were being referred to the DGPDPH, CISST stopped submitting separate applications to the Ministry on a regular basis towards the end of 2024.

The distribution of applications by institution over the past five years is presented below:

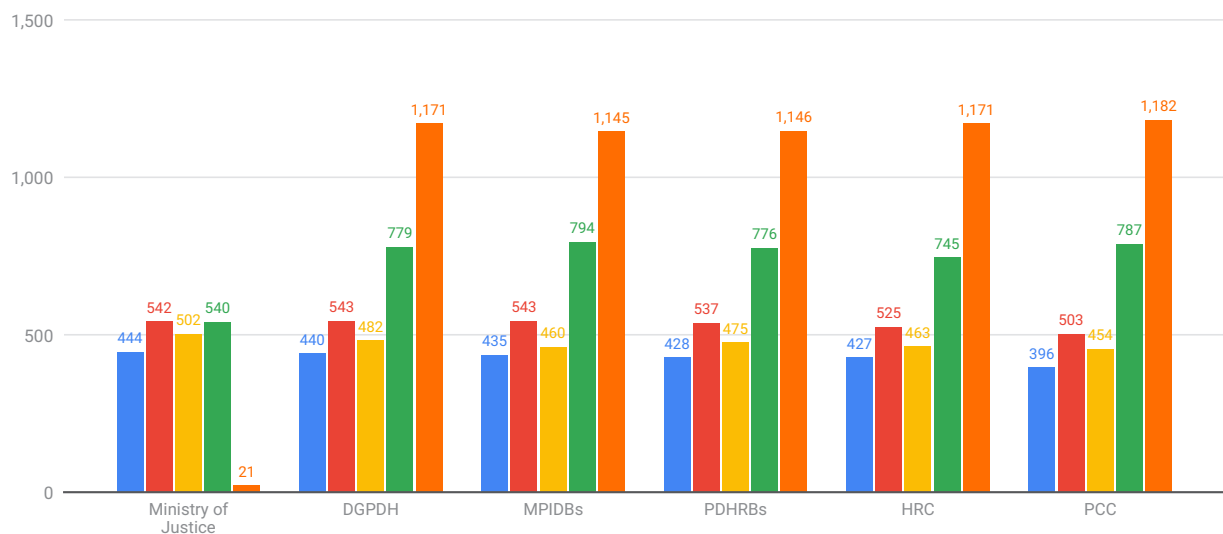
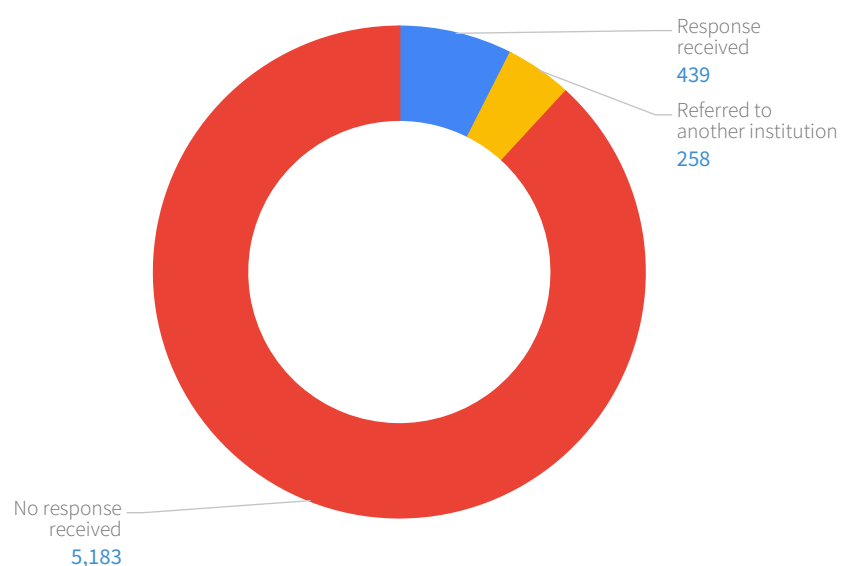


Chart 2: Distribution of applications by institution and year

■ 2021 ■ 2022 ■ 2023 ■ 2024 ■ 2025

The response status of applications submitted in 2025 is presented below:



Graphic 2: Response status of applications submitted in 2025

Of the 5,880 applications submitted in 2025, only 439 received a response, resulting in an overall response rate of approximately 7.5%. A further 258 applications were referred to another institution, while 5,183 received no response. Referral to another institution does not necessarily mean that the application has been examined on its merits or that the allegations raised have been assessed. The fact that approximately 88% of applications remained unanswered demonstrates the significant limitations of official complaint and oversight mechanisms in examining allegations of rights violations, reaching conclusions on applications, and informing applicants of the outcomes.

The distribution of responses by institution and year is presented below:

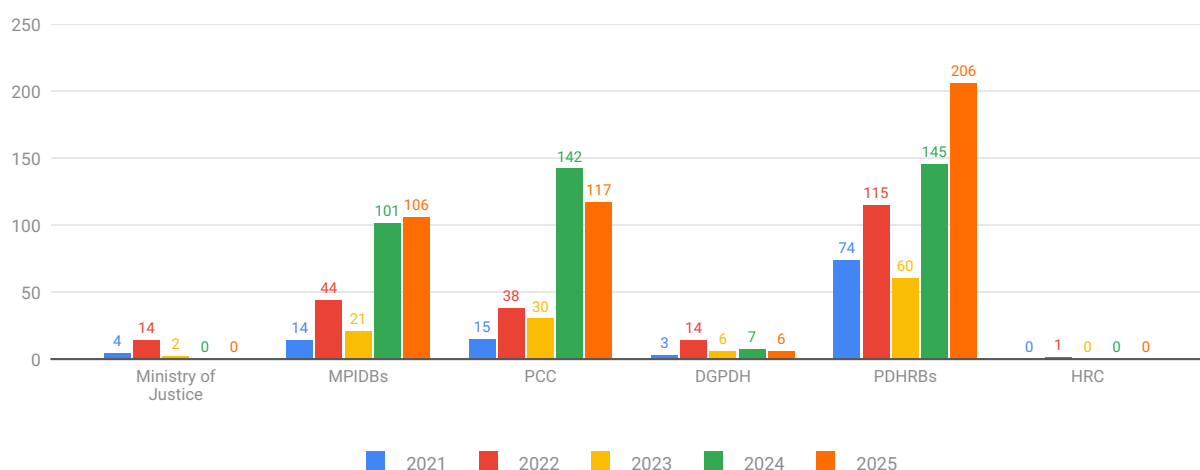
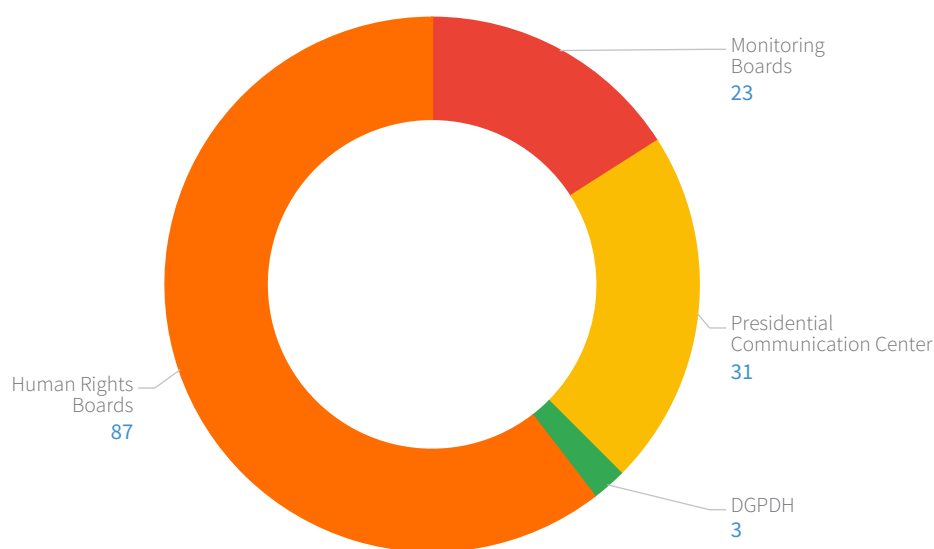


Chart 3: Distribution of responses by institution and year

There are significant differences in response rates among the institutions concerned. In 2025, the Provincial and District Human Rights Boards had the highest response rate, responding to 206 of 1,146 applications, or approximately 18%. By contrast, the response rates were approximately 9.9% for the Presidential Communication Center, 9.3% for the Monitoring Boards of Penal Institutions and Detention Houses, and 0.5% for the Directorate General of Prisons and Detention Houses. The Human Rights Inquiry Commission of the Grand National Assembly of Türkiye did not respond to any of the 1,171 applications submitted to it.

However, the mere fact that an application received a response does not necessarily indicate that it was examined effectively or substantively. An analysis of the responses reveals that some institutions merely cited relevant legal provisions rather than assessing the specific allegations raised.

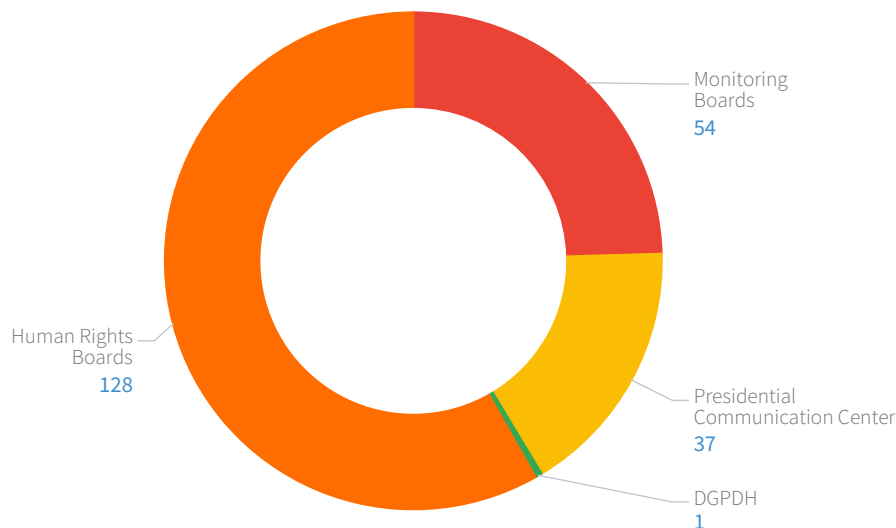
The distribution of responses received in 2025 that consisted solely of references to relevant legal provisions is presented below:



Graphic 3: Responses limited to citing legal provisions, by institution

Of the 439 responses received in 2025, 144 merely cited relevant legal provisions without assessing the specific allegations raised in the applications. This represents approximately one-third of all responses received. However, the applications had specifically requested clarification as to whether the relevant legal provisions had been applied in the circumstances of the individual case. Some responses simply stated that the practices in question were not contrary to the law, while others withheld the requested details on the grounds that they constituted “internal institutional information”. Such responses do not provide a reasoned and reviewable assessment of the substance of the alleged rights violations.

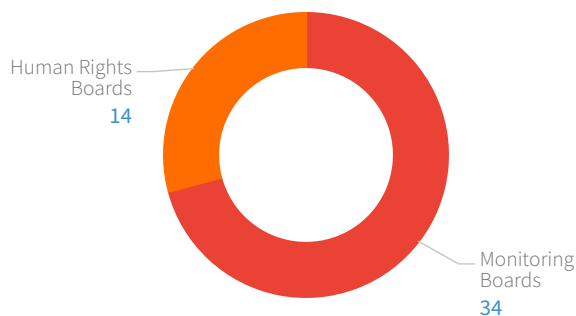
The distribution of responses received in 2025 indicating that information had been requested from the relevant institutions is presented below:



Graphic 4: Responses reporting that information was requested, by institution

In responses concerning a total of 220 applications, it was stated that information had been requested from the relevant institutions. This is significant insofar as it indicates that these applications were subject to at least some form of desk-based examination. However, requesting information from the relevant institutions does not, in itself, demonstrate that an effective examination was conducted.

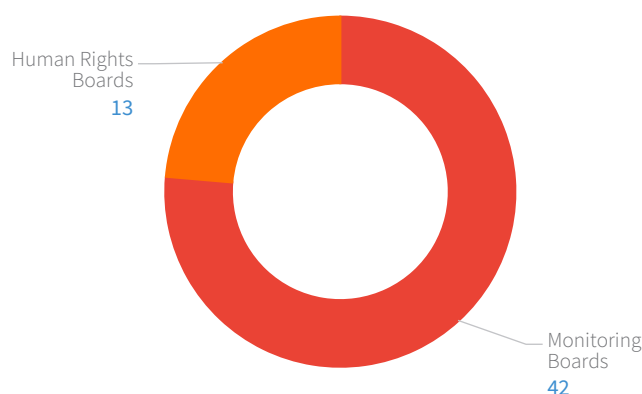
The distribution of responses received in 2025 indicating that a prison visit had been conducted is presented below:



Graphic 5: Responses reporting a prison visit, by institution

Of the responses received in 2025, 48 indicated that a prison visit had been conducted. Although a total of 2,291 applications were submitted to the Monitoring Boards of Penal Institutions and Detention Houses and Provincial and District Human Rights Boards, both of which are authorised to visit prisons, only 48 responses from these two mechanisms reported that a prison visit had taken place. This suggests that on-site prison visits were used only to a limited extent in examining allegations of rights violations.

The distribution of responses received in 2025 indicating that the prisoner concerned had been interviewed is presented below:



Graphic 6: Responses reporting an interview with the prisoner, by institution

Of the responses received in 2025, 55 indicated that the prisoner concerned had been interviewed. Obtaining a statement directly from the prisoner is a fundamental element of an effective examination of allegations of rights violations. Nevertheless, the number of responses indicating that a prisoner had been interviewed remained very low relative to the overall volume of applications. This suggests that direct interviews with prisoners were conducted only to a limited extent.

Application Mechanisms Used in 2025

As in previous years, CİSST submitted applications to relevant authorities in 2025, requesting the examination of allegations of human rights violations reported by prisoners and their relatives and the remedying of any violations. This section examines, separately for each institution, its mandate and powers in relation to prisons, the applications submitted to it by CİSST in 2025, and the responses received. Taking into account the different mandates and functions of these institutions, the assessment considers how applications were handled, the content of the responses provided, and the actions reported to have been taken in response to the applications.

MONITORING BOARDS OF PENAL INSTITUTIONS AND DETENTION HOUSES

The annual distribution of applications submitted to the Monitoring Boards of Penal Institutions and Detention Houses is presented below:

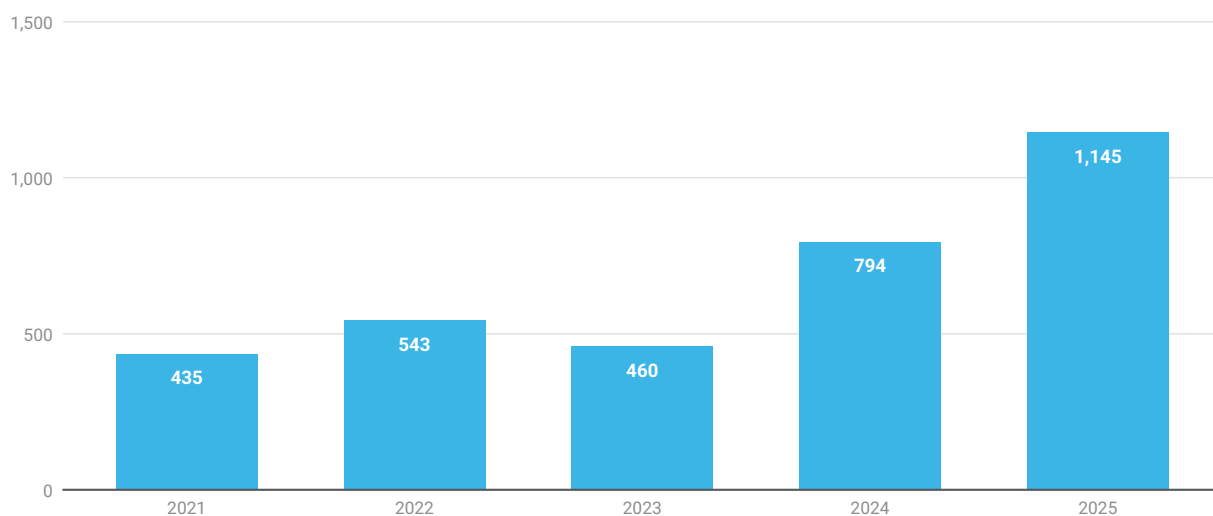


Chart 4: Annual distribution of applications to the Monitoring Boards

In 2001, Türkiye enacted Law No. 4681 on Monitoring Boards of Penal Institutions and Detention Houses², in accordance with the principles established under the international treaties to which it is a party. Law No. 4681 provides for the establishment of a Monitoring Board of Penal Institutions and Detention Houses by each Judicial Justice Commission within whose jurisdiction a prison is located.

The purpose of these Monitoring Boards is defined in Article 1 of Law No. 4681 as "observing and examining the administration, functioning and practices of prisons on-site, obtaining information, and reporting their findings to the competent and relevant authorities". The Boards are required to submit periodic monitoring reports at least once every four months to various authorities, including the Ministry of Justice, public prosecutors' offices, the relevant enforcement judgeships where matters fall within their jurisdiction, and the Human Rights Inquiry Commission of the Grand National Assembly of Türkiye. However, these reports are not publicly accessible to the general

² Law No. 4681 on Monitoring Boards of Penal Institutions and Detention Houses, adopted 14.06.2001, Official Gazette 21.06.2001, No. 24439.

public or relevant civil society organisations.

Each Monitoring Board consists of five full members, including the chairperson, and three substitute members. Members are elected for a four-year term and may be re-elected upon the expiry of their term. In addition to meeting the general eligibility requirements set out in Civil Servants Law No. 657, members must satisfy further requirements relating to age, education, and at least ten years of professional experience.

The selection of Monitoring Board members is regulated under Law No. 4681, which provides that "members shall be elected unanimously by the Judicial Justice Commission from among persons meeting the requirements set out in Articles 3 and 4, identified ex officio, following consultation with the relevant professional organisations having the status of public institutions in the locality, or with the assistance of the highest local administrative authority, as well as from among those who apply directly".

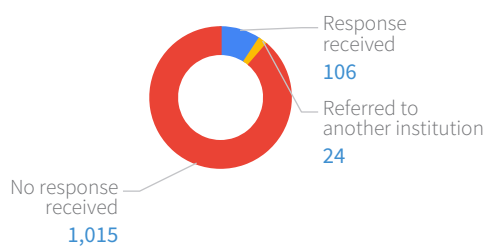
However, the law does not clearly regulate when the selection of Monitoring Board members should take place, where and how membership applications should be submitted, the criteria against which candidates should be assessed, or any specific appeal mechanism available to unsuccessful applicants. The requirement that members meet the general eligibility conditions for civil service under Law No. 657 also restricts participation in the Monitoring Boards and raises questions concerning compliance with the standards of independence and pluralism established by the Paris Principles. Furthermore, Decree-Law No. 673 of 1 September 2016 simultaneously terminated the terms of office of all Monitoring Board chairpersons and members and required new elections to be held within ten days. This intervention reinforced concerns about whether the security of tenure of Monitoring Board members and the institutional independence of the Boards are adequately safeguarded.

Although various training programmes and monitoring materials are known to have been developed for Monitoring Board members, publicly available information remains limited regarding the content and regularity of these training programmes and whether they reach all members. It is also insufficiently clear which common criteria the Monitoring Boards apply in their monitoring and reporting activities and which

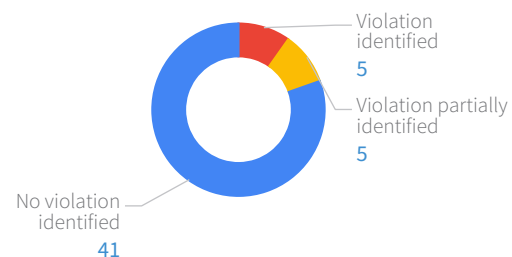
standards they use to determine whether rights violations have occurred.

An examination of the responses to CİSST's applications reveals a lack of a consistent approach among the Monitoring Boards, with responses to similar issues varying in scope and content. The insufficient consideration given to international treaties and standards in these responses is also notable. Law No. 4681 does not provide for a specific appeal mechanism where an examination conducted by a Monitoring Board is considered inadequate or ineffective.

2025 Applications to the Monitoring Boards



Graphic 7: MPIDB applications by response status



Graphic 8: MPIDB responses by finding

In 2025, CİSST submitted a total of 1,145 applications to the Monitoring Boards. Of these, 106 received a response, 24 were referred to other institutions, and 1,015 remained unanswered. Accordingly, the response rate of the Monitoring Boards was approximately 9.3%, while approximately 89% of applications received no response. The fact that the vast majority of applications remained unanswered makes it difficult to determine whether the allegations raised were examined and whether any action was taken.

Of the 106 responses provided by the Monitoring Boards, 51 contained an explicit assessment of the alleged violation raised in the application. In five of these responses, a violation was identified; in another five, a violation was partially identified; and in 41, it was stated that no violation had been found. By contrast, the remaining 55 responses did not include an explicit assessment of the alleged violation.

Furthermore, of the 106 responses received, 54 indicated that information had been requested from the relevant institutions, 34 reported that a prison visit had been conducted, and 42 stated that the prisoner concerned had been interviewed.³ Given that one of the primary responsibilities of the Monitoring Boards is to conduct on-site inspections in prisons, it is notable that prison visits were reported in only 34 responses.

³ As a single response may indicate that more than one of these actions was taken, the same response may be counted under more than one category.

PROVINCIAL AND DISTRICT HUMAN RIGHTS BOARDS

The annual distribution of applications submitted to the Provincial and District Human Rights Boards is presented below:

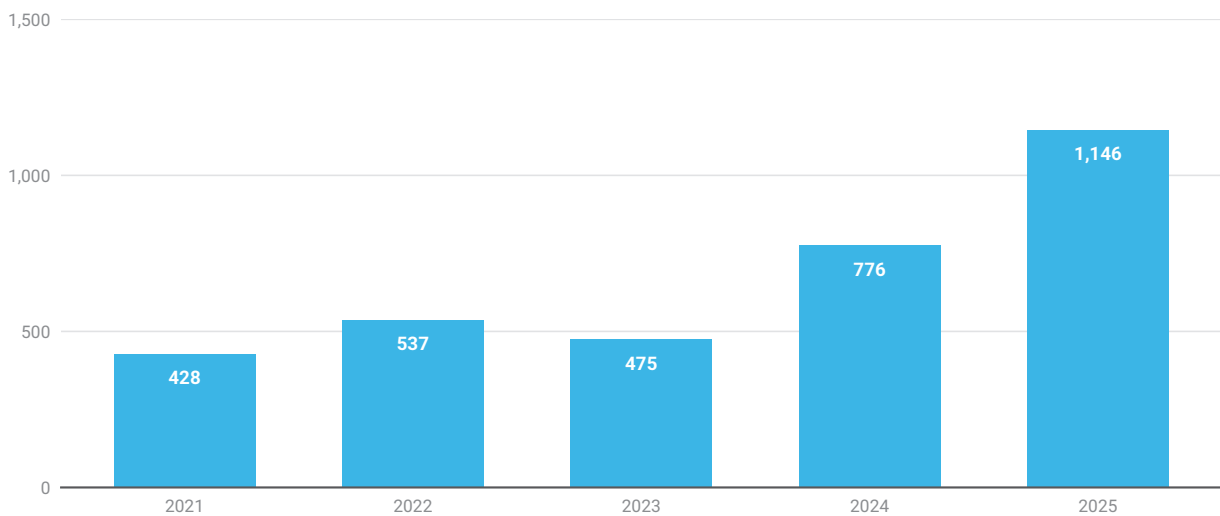


Chart 5: Annual distribution of applications to the Human Rights Boards

The Provincial and District Human Rights Boards are among the institutions authorised to conduct direct monitoring of prisons in Türkiye. The Regulation on the Establishment, Duties and Working Procedures of Provincial and District Human Rights Boards⁴, issued pursuant to Additional Article 6 of Law No. 3056, as introduced by Law No. 4643, provides for the establishment of these Boards in all provinces and districts. The Boards are responsible for examining and investigating allegations of human rights violations.

Article 13 of the Regulation defines the functions of the Provincial and District Human Rights Boards as follows: "The Provincial and District Boards are responsible for examining and investigating applications concerning allegations of human rights violations, evaluating the findings of such examinations and investigations, referring their conclusions to public prosecutors' offices or the relevant administrative authorities, depending on the subject matter, and following up on the outcomes."

⁴ Regulation on the Establishment, Duties and Working Procedures of Provincial and District Human Rights Boards, Official Gazette 23.11.2003, No. 25298.

Under this provision, the Provincial and District Human Rights Boards are authorised to examine and assess allegations of human rights violations submitted to them. However, they have not been granted the power to impose sanctions directly or issue binding decisions on applications. The Boards may only communicate their non-binding findings and recommendations to public prosecutors' offices and the relevant administrative authorities and have no authority to directly ensure their implementation.

When assessed against the Paris Principles, the structural independence of the Provincial and District Human Rights Boards, like that of the Monitoring Boards of Penal Institutions and Detention Houses, is also open to question. Provincial Boards are chaired by the governor or a deputy governor designated by the governor, while District Boards are chaired by the district governor. In metropolitan provinces, the metropolitan mayor or deputy mayor serves as a member of the Provincial Board, while in other provinces, the provincial mayor or deputy mayor serves in this capacity. District Boards include the district mayor or deputy mayor among their members.

The representation of bar associations, medical chambers, chambers of commerce or industry, and other professional organisations on the Boards is a positive feature in terms of pluralism. Civil society organisations and other civil society actors may also apply to serve on the Boards. However, representatives of civil society organisations serving on Provincial Boards are selected by the governor's office, while those serving on District Boards are selected by the district governor's office. This authority vested in local administrative officials to select civil society representatives raises questions concerning the standards of independence and pluralism established by the Paris Principles.

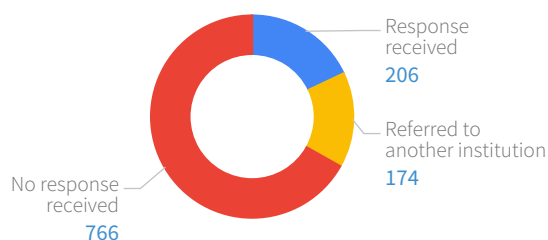
The Regulation does not sufficiently clarify when and through which procedures members of the Provincial and District Human Rights Boards are selected, who may apply and under what conditions, or which criteria local administrative officials must apply in making their selections. Similarly, there is uncertainty regarding the availability of a specific appeal mechanism for unsuccessful applicants and the criteria governing the selection of members.

Article 10 of the Regulation provides for the installation of "Human Rights Application Boxes" in all public institutions and organisations to facilitate access to the Provincial and District Human Rights Boards. However, comprehensive and publicly available information is lacking as to whether these boxes are installed in prisons and whether prisoners can access this application mechanism in practice.

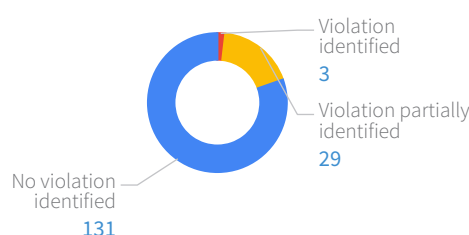
Although Article 12(h) and (i) of the Regulation contain specific provisions concerning inspections of police stations and police custody facilities, prisons are not explicitly mentioned. As a result, some Provincial and District Human Rights Boards may, in practice, consider applications concerning prisons to fall outside their mandate. Nevertheless, Article 12(f) of the same Regulation assigns the Boards the duty to "conduct visits to relevant institutions and organisations to observe human rights practices on-site". Read together, these provisions indicate that prisons are not excluded from the Boards' authority to conduct visits, while police stations and police custody facilities are specifically emphasised. Despite this, the absence of an explicit reference to prisons in the Regulation, together with the lack of detailed provisions governing the principles and criteria for conducting visits, may lead to differing interpretations among the Boards regarding the scope of their authority.

As with the reports prepared by the Monitoring Boards of Penal Institutions and Detention Houses, the visit and inspection reports produced by the Provincial and District Human Rights Boards are not made publicly available to the general public and civil society organisations on a regular and systematic basis.

2025 Applications to the Provincial and District Human Rights Boards



Graphic 9: PDHRB applications by response status



Graphic 10: PDHRB responses by finding

In 2025, CiSST submitted a total of 1,146 applications to the Provincial and District Human Rights Boards. Of these, 206 received a response, 174 were referred to other institutions, and 766 remained unanswered. Accordingly, the Boards' response rate was approximately 18%, while approximately 67% of applications received no response. Although the Provincial and District Human Rights Boards had the highest response rate among the institutions to which applications were submitted, the fact that approximately two-thirds of applications remained unanswered demonstrates their limited capacity to handle applications and inform applicants of the outcomes.

Of the 206 responses provided by the Provincial and District Human Rights Boards, 163 contained an explicit assessment of the alleged violation raised in the application. In three of these responses, a violation was identified; in 29, a violation was partially identified; and in 131, it was stated that no violation had been found. By contrast, the remaining 43 responses did not include an explicit assessment of the alleged violation. Thus, approximately 16% of the responses provided by the Boards identified a violation, either in whole or in part, in relation to the allegations raised in the applications.

Furthermore, of the 206 responses received, 128 indicated that information had been requested from the relevant institutions, 14 reported that a prison visit had been conducted, and 13 stated that the prisoner concerned had been interviewed.⁵ This distribution indicates that the Provincial and District Human Rights Boards relied much more frequently on requesting information from the relevant institutions than on direct examination methods, such as prison visits and interviews with prisoners.

⁵ As a single response may indicate that more than one of these actions was taken, the same response may be counted under more than one category.

MINISTRY OF JUSTICE AND DIRECTORATE GENERAL OF PRISONS AND DETENTION HOUSES

The annual distribution of applications submitted to the Ministry of Justice and the Directorate General of Prisons and Detention Houses is presented below:

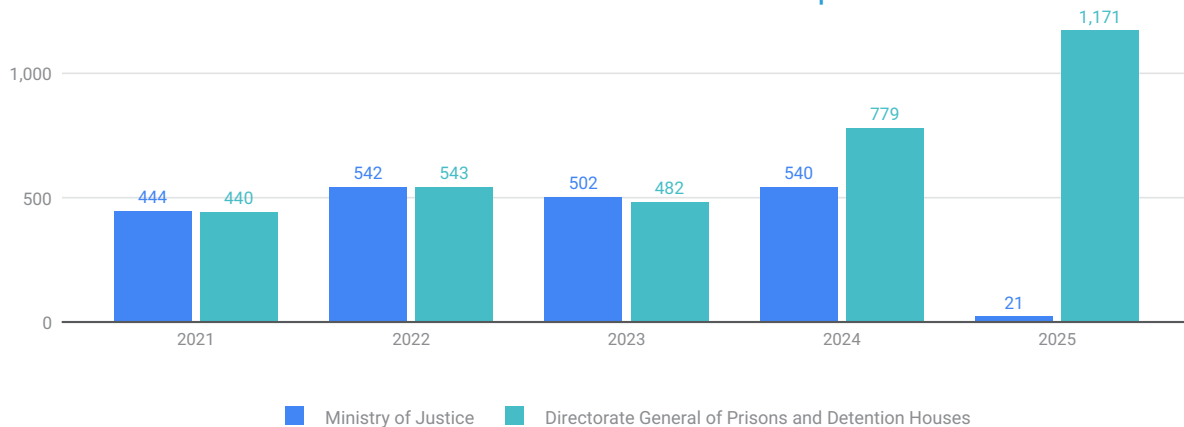
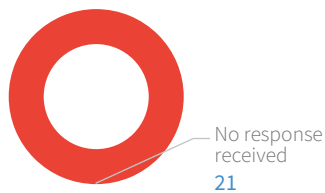


Chart 6: Annual distribution of applications to the MoJ and the DGPDPH

Prisons operate under the Directorate General of Prisons and Detention Houses (DGPDPH), which forms part of the organisational structure of the Ministry of Justice. The responsibilities of the DGPDPH include managing and supervising prisons, ensuring the provision of sentence enforcement services, and carrying out administrative procedures concerning prisoners' living conditions. Consequently, applications submitted to the Ministry of Justice concerning complaints raised by prisoners and their relatives are generally referred to the DGPDPH. In response to this practice, CISST stopped submitting separate applications to the Ministry of Justice on a regular basis in October 2024 and began submitting its applications directly to the DGPDPH.

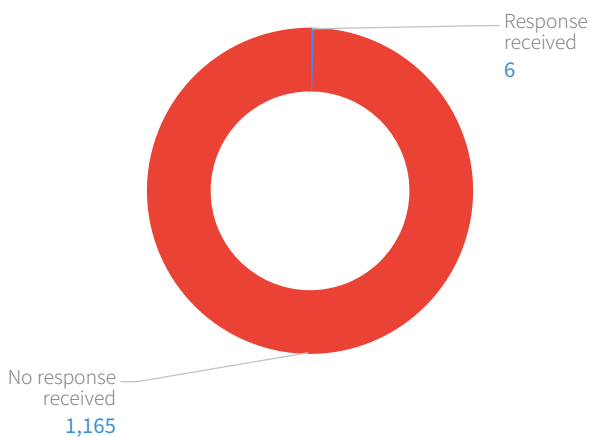
2025 Applications to the Ministry of Justice



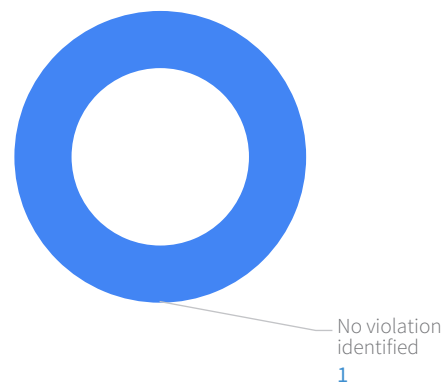
Graphic 11: MoJ applications by response status

In 2025, CİSST submitted only 21 applications to the Ministry of Justice and received no response to any of them.

2025 Applications to the Directorate General of Prisons and Detention Houses



Graphic 12: DGPDPH applications by response status



Graphic 13: DGPDPH responses by finding

In 2025, CİSST submitted a total of 1,171 applications to the DGPDPH. Only six of these applications received a response, while 1,165 remained unanswered. Accordingly, the DGPDPH's response rate was approximately 0.5%, with approximately 99.5% of

applications receiving no response. Given that the DGPDH is directly responsible for the management and supervision of prisons, this rate makes it particularly difficult to monitor how applications are handled and what actions are taken in response. Only one of the responses provided by the DGPDH stated that no violation had been found.

Furthermore, in some responses sent by the DGPDH to CİSST, it is stated that the prisoner concerned has been informed, without disclosing the outcome of the application. While informing the prisoner directly is important, the failure to provide CİSST with information about the substance of the application and the actions taken makes it difficult to follow up on the outcome and examine the assessment carried out by the DGPDH.

HUMAN RIGHTS INQUIRY COMMISSION OF THE GRAND NATIONAL ASSEMBLY OF TÜRKİYE

The annual distribution of applications submitted to the Human Rights Inquiry Commission

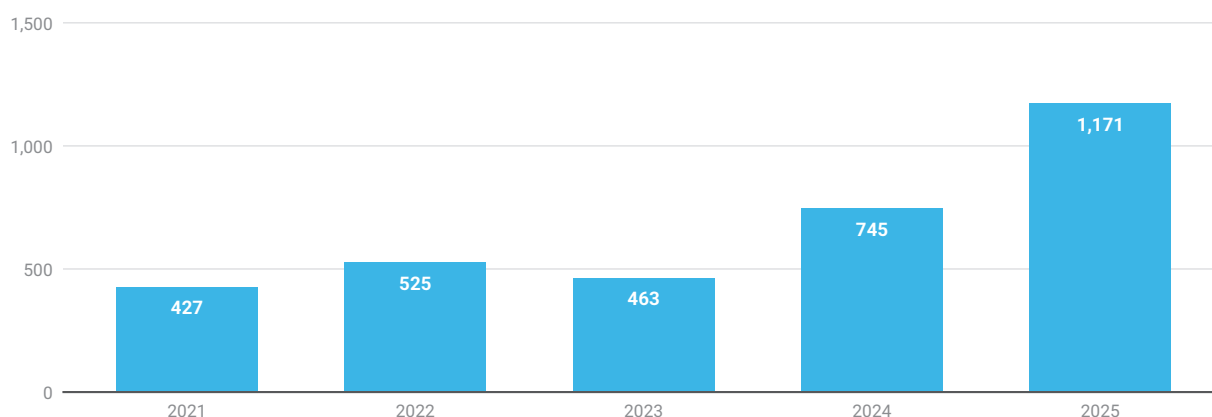


Chart 7: Annual distribution of applications to the Human Rights Inquiry Commission

The authority to inspect and monitor prisons may also be exercised through various mechanisms within the Grand National Assembly of Türkiye. Members of Parliament may visit prisons to examine living conditions on-site and interview prisoners. However, written authorisation from the Ministry of Justice is required for Members of Parliament to visit prisoners detained or convicted of certain offences specified in the Turkish Penal Code or offences falling under Anti-Terror Law No. 3713. Members of Parliament may also raise allegations of human rights violations in prisons through written parliamentary questions and motions for parliamentary inquiries.

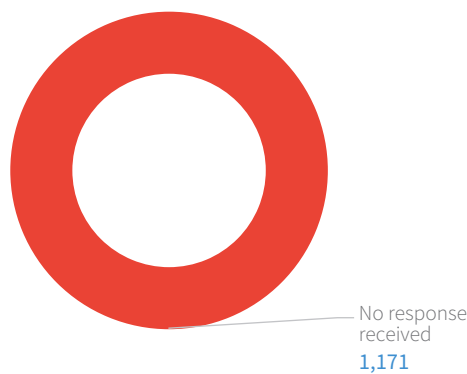
Another inspection and monitoring mechanism within the Grand National Assembly of Türkiye is the Human Rights Inquiry Commission, established under Law No. 3686 on the Human Rights Inquiry Commission of 5 December 1990⁶, together with its Subcommittee on the Rights of Convicted and Remand Prisoners. These bodies are authorised to examine allegations of human rights violations submitted by prisoners, their relatives, and relevant civil society organisations, or to refer such allegations to the relevant authorities where deemed necessary.

In examining complaints submitted to it, the Human Rights Inquiry Commission may

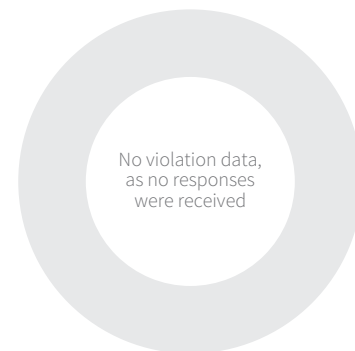
⁶ Law No. 3686 on the Human Rights Inquiry Commission, Official Gazette 12.12.1990, No. 20723.

request information and documents from public institutions and authorities, including the Ministry of Justice and the Directorate General of Prisons and Detention Houses, request that investigations be conducted, and summon relevant persons to provide information. Furthermore, through delegations established pursuant to formal decisions to conduct an inquiry, the Commission may visit prisons without prior notice, conduct on-site inspections, interview prisoners in private, and observe the physical conditions of prisons and the living conditions of prisoners.

2025 Applications to the Human Rights Inquiry Commission



Graphic 14: HRC applications by response status



Graphic 15: HRC responses by finding

In 2025, CİSST submitted a total of 1,171 applications to the Human Rights Inquiry Commission, but none received a response. Over the past five years, only one response was received from the Commission, in 2022, while no applications were answered in 2021, 2023, 2024, or 2025. This demonstrates that the lack of responses is not confined to a single year.

As no responses were received from the Human Rights Inquiry Commission, it remains unknown whether the applications were examined, whether information was requested from the relevant authorities, whether prison visits or interviews with prisoners were conducted, or whether any assessment of the alleged violations was made. The Commission's failure to respond to any of the applications submitted to it, a practice that has persisted in previous years, indicates the absence of a visible and traceable link between individual applications and parliamentary oversight.

PRESIDENTIAL COMMUNICATION CENTER

The annual distribution of applications submitted to the Presidential Communication Center is presented below:

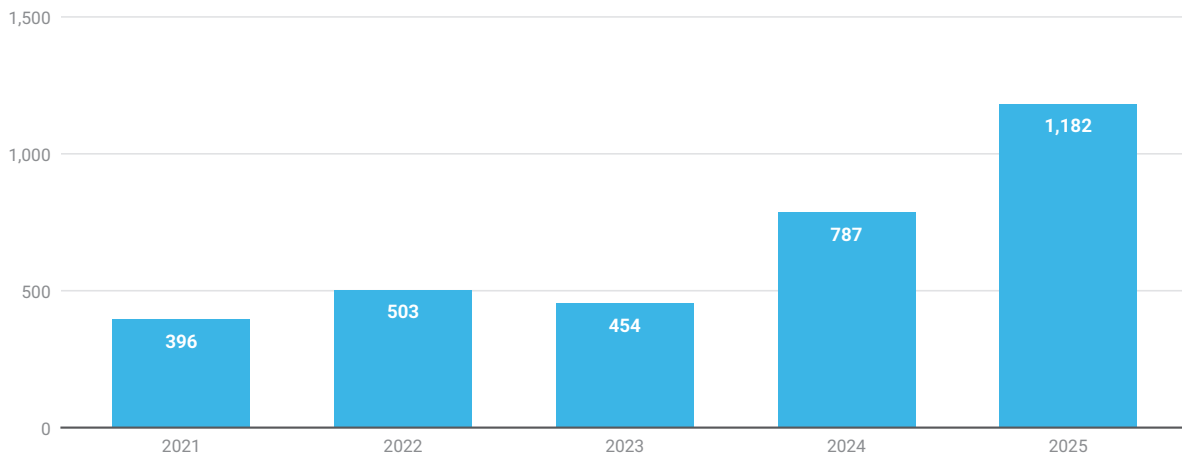
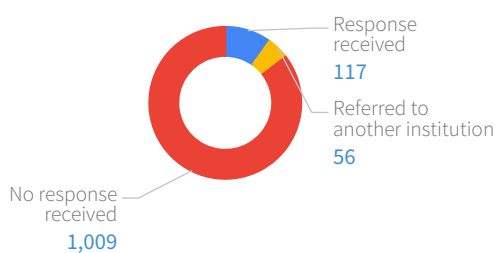


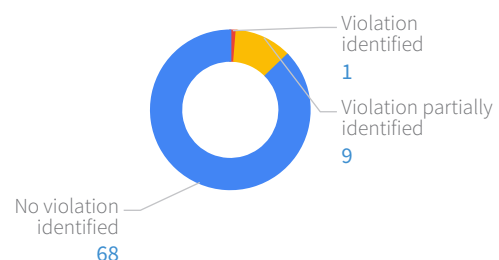
Chart 8: Annual distribution of applications to the Presidential Communication Center

The functions of the Prime Ministry Communication Center, established under the Prime Ministry in 2006, were incorporated into the Presidential Communication Center in 2018, following the transition to the Presidential Government System and the abolition of the Office of the Prime Minister. Operating under the coordination of the Directorate of Communications, the Presidential Communication Center is a centralized application mechanism through which individuals can submit requests, reports, complaints, opinions, and suggestions to the relevant public institutions and track their applications via the e-Government portal.

2025 Applications to the Presidential Communication Center



Graphic 16: PCC applications by response status



Graphic 17: PCC responses by finding

In 2025, CİSST submitted a total of 1,182 applications to the Presidential Communication Center. Of these, 117 received a response, 56 were referred to other institutions, and 1,009 remained unanswered. Accordingly, the response rate was approximately 9.9%, while approximately 85% of applications received no response. The number of applications submitted to the Presidential Communication Center increased by approximately 50%, from 787 in 2024 to 1,182 in 2025. By contrast, the number of responses declined from 142 to 117, while the response rate fell from approximately 18% to 9.9%. Thus, the increase in the volume of applications was not accompanied by an increase in either the number or the proportion of responses.

Of the 117 responses provided by the Presidential Communication Center, 78 contained an explicit assessment of the alleged violation raised in the application. In one of these responses, a violation was identified; in nine, a violation was partially identified; and in 68, it was stated that no violation had been found. By contrast, the remaining 39 responses did not include an explicit assessment of the alleged violation. Thus, approximately 9% of the responses provided by the Presidential Communication Center identified a violation, either in whole or in part, in relation to the allegations raised in the applications.

Furthermore, 37 of the 117 responses received indicated that information had been requested from the relevant institutions to which the applications had been referred or from which information had been sought. One response also reported that a prison visit had been conducted, while another indicated that the prisoner concerned had been interviewed. Since the Presidential Communication Center itself has no authority to conduct on-site prison inspections or interview prisoners, these figures do not represent monitoring activities carried out by the Presidential Communication Center, but rather actions reported to have been taken by the relevant institutions to which the applications were referred.

OMBUDSMAN INSTITUTION

The Ombudsman Institution, also known as the Ombudsman, was recognised as a constitutional complaint mechanism through an amendment to Article 74 of the Constitution in 2010 and was established under Law No. 6328 on the Ombudsman Institution⁷, which entered into force in 2012. The Ombudsman Institution began operating in 2013 and continues to function under the Office of the Speaker of the Grand National Assembly of Türkiye.

The Ombudsman Institution is a public legal entity with a separate budget, headquartered in Ankara. It is an oversight mechanism authorised to examine not only the acts and actions of public institutions but also those of private legal entities providing public services, insofar as they relate to the provision of such services. Upon receiving complaints concerning the functioning of the administration, the Ombudsman Institution is responsible for examining and investigating all administrative acts, actions, attitudes, and conduct in terms of their compliance with law and equity, within a human rights-based understanding of justice, and for making recommendations to the administration.

The decisions of the Ombudsman Institution are not binding, and the Institution has no authority to impose sanctions directly. Following an examination, it may issue recommendations to the relevant administrative authority. If the authority does not implement a recommendation, it is required to inform the Ombudsman Institution of its reasons within 30 days.

The Ombudsman Institution consists of the Office of the Chief Ombudsman and the General Secretariat. It has one Chief Ombudsman and five Ombudsmen. In addition to examining complaints and making recommendations to the administration, the Chief Ombudsman coordinates the division of responsibilities among the Ombudsmen and the overall functioning of the Institution. The Ombudsman Institution may establish offices in different provinces where deemed necessary.

⁷ Law No. 6328 on the Ombudsman Institution, Official Gazette 29.06.2012, No. 28338.

Both natural and legal persons may submit applications to the Ombudsman Institution. Applications may be submitted through written petitions, the e-Government portal, or other electronic application channels, and may be kept confidential at the applicant's request. As a general rule, relevant administrative remedies must be exhausted before an application is submitted to the Ombudsman Institution. However, applications may be accepted without this requirement where there is a risk of harm that would be difficult or impossible to remedy.

The Ombudsman Institution is required to conclude applications within six months at the latest. The resulting decision is communicated to the applicant and the relevant administrative authority. Applicants are also informed of other available remedies, the applicable time limits, and the authorities to which they may apply. The Ombudsman Institution also prepares annual and special reports to inform the public about its activities and findings.

The distribution of decisions issued by the Ombudsman Institution concerning applications submitted by CISST in 2024 and 2025 is presented below:

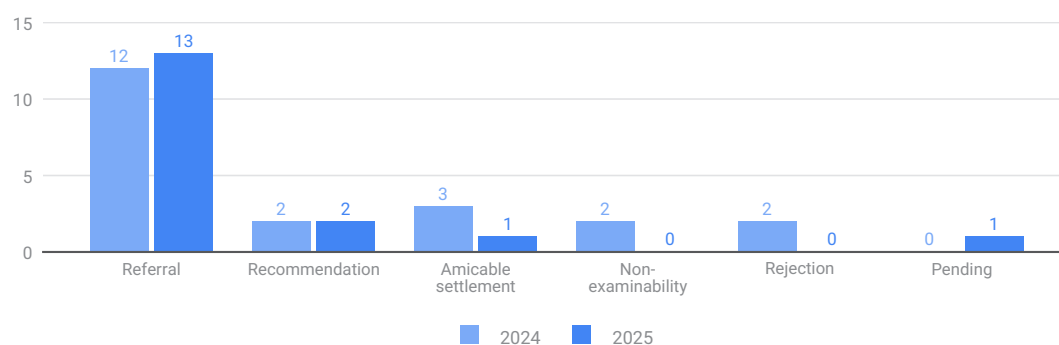


Chart 9: Ombudsman Institution decisions by year

The Ombudsman Institution issued referral decisions in 13 of the 17 applications submitted by CISST in 2025. This represents approximately 76.5% of the applications submitted to the Institution that year. In these decisions, the Ombudsman Institution referred the applications to the relevant institutions and organisations, including the Ministry of Justice, the Directorate General of Prisons and Detention Houses, the Student Selection and Placement Center, the Information and Communication Technologies

Authority, and Türk Telekom, for consideration without examining the merits of the applications. Accordingly, a referral decision does not mean that the alleged human rights violation raised in the application has been examined or that the allegation has been found to be substantiated or unfounded.

The Ombudsman Institution issued recommendation decisions in two applications. These decisions concerned the failure to respond to requests for information on the number of prisoners who had benefited from presidential pardons and on sexual and reproductive health initiatives for women prisoners. In both cases, the Ombudsman Institution recommended that the Ministry of Justice share the requested information with CISST.

The Ombudsman Institution concluded one application concerning girls in prison through an amicable settlement decision. The application requested information on the prisons in which girls were held, their numerical distribution across prisons, and the special measures taken for them. During the Ombudsman Institution's examination, information was obtained from the Directorate General of Prisons and Detention Houses; however, the numerical breakdown of girls held in each prison was not provided. The Ombudsman Institution accepted that compiling the disaggregated data would require a separate study, considered the response sufficient, and concluded the application through an amicable settlement decision. Therefore, the classification of this decision as an amicable settlement does not mean that CISST's request for information was fully satisfied.

Overall, only three of the 17 applications were substantively examined by the Ombudsman Institution, resulting in recommendation or amicable settlement decisions. Notably, all three applications concerned requests for information. By contrast, a significant proportion of applications involving direct allegations concerning prison conditions and the right to communication, as well as requests for information relating to the right to health, were referred to the relevant institutions and organisations without examination on their merits.

Conclusion

Throughout 2025, CiSST submitted a total of 5,880 applications to the relevant authorities, requesting the examination of complaints and allegations of human rights violations reported by prisoners and their relatives, as well as remedies for the harm suffered. The number of applications increased significantly compared with the previous year. While economic conditions and rising postage costs continued to make it difficult for prisoners to contact CiSST by letter, CiSST's Prisoner Helpline remained an important channel through which prisoners and their relatives could access the organisation and submit their complaints and requests.

An examination of the responses received and the actions reported to have been taken in response to these applications revealed the following key problems concerning how official complaint and oversight mechanisms handle allegations of human rights violations and exercise their oversight powers:

- Failure to respond has become a persistent problem in the functioning of institutions: The fact that approximately 88% of applications remained unanswered indicates that responding has become the exception, while silence has become the norm in institutional practice. Such widespread failure to respond substantially undermines the ability of complaint mechanisms to investigate allegations of human rights violations, ensure administrative accountability, and contribute to remedying violations. Given that prisoners' lives and conditions of detention are entirely under state control, leaving allegations of human rights violations unanswered weakens the administration's obligation to account for its actions and further deepens the power imbalance between prison administrations and prisoners.
- A significant proportion of responses do not contain an assessment of the merits: In approximately one-third of the responses received, the relevant legal provisions were merely cited without assessing the allegations raised. However, the purpose of oversight is not to establish the existence of legislation, but to examine whether the administration's acts and practices in specific cases comply with the law and

human rights standards. Responses limited to citing legislation may formally conclude correspondence, but they do not clarify the alleged violation or examine the gap between legal safeguards and actual prison practices. By failing to engage with the specific facts, such responses reproduce conclusions of legal compliance without providing reasons, rather than scrutinising the acts and practices of the administration against which the complaint was made. This raises serious questions about the independence and accountability of the examination process.

- On-site inspections and interviews with prisoners have not become routine elements of external oversight: Responses received from the Monitoring Boards of Penal Institutions and Detention Houses and the Provincial and District Human Rights Boards, both of which are authorised to conduct on-site prison inspections, show that requesting written information from the relevant institutions is far more common than conducting prison visits or interviewing prisoners. In closed, hierarchical environments such as prisons, where communication with the outside world is subject to administrative control, oversight based primarily on written information and documents provided by the institutions concerned does not constitute an effective method of examination. This approach reduces oversight to a bureaucratic exchange of correspondence between institutions, further exacerbating the risks of human rights violations and the lack of visibility inherent in closed institutions.
- The scope and quality of oversight vary between boards: The fact that Monitoring Boards of Penal Institutions and Detention Houses and Provincial and District Human Rights Boards in different provinces and districts provide responses of varying scope and content to similar applications governed by the same legislation results in differences in the oversight available to prisoners. When the manner in which allegations of human rights violations are handled, the scope of examinations, and the content of responses depend on the discretion of individual boards, this indicates that common and objective oversight standards are not sufficiently reflected in practice. This undermines the predictability of oversight and creates inequalities in the protection of rights.

- Referral of applications between institutions may substitute for substantive examination: Referring an application to another institution does not mean that the alleged human rights violation has been examined on its merits, that the necessary information and evidence have been collected, or that any action has been taken to remedy the harm suffered. When oversight mechanisms refer allegations to the very administrative bodies against which complaints have been made, rather than examining those allegations themselves, the independence and effectiveness of oversight are weakened. Where the referring mechanism fails to follow up on the application and inform the applicant of the actions taken and conclusions reached by the relevant institution, the application becomes a piece of correspondence transferred between institutions without any traceable outcome.
- The structure and functioning of oversight mechanisms do not provide the safeguards necessary for independence and pluralism: The independence of oversight requires more than simply granting institutions the authority to conduct examinations. It also requires safeguards ensuring that they can operate free from administrative and political influence, from the selection of their members to the collection of information and decision-making processes. The existing structures of the Monitoring Boards of Penal Institutions and Detention Houses and the Provincial and District Human Rights Boards blur the institutional boundaries between those conducting oversight and those subject to it, and do not guarantee the pluralistic participation of different segments of society and human rights experts in oversight processes. This makes it more difficult for oversight to go beyond the information and assessments provided by the administration and weakens confidence in these mechanisms' external oversight function.
- The lack of public access to the work of oversight institutions weakens oversight and accountability: The failure to publish, regularly and accessibly, the periodic monitoring reports that the Monitoring Boards of Penal Institutions and Detention Houses and the Provincial and District Human Rights Boards are required to prepare, as well as information on the actions taken in response to applications

and the conclusions reached, makes it difficult to scrutinise their work. The lack of disaggregated data on applications, prison visits, interviews with prisoners, findings of violations, and measures taken limits public visibility of human rights violations in prisons. This lack of transparency not only prevents civil society from conducting independent monitoring but also weakens the administration's obligation to account for its actions and reinforces conditions that perpetuate impunity.

- The inadequacy of official mechanisms creates an even greater oversight gap where civil society has no access to prisons: The inability of human rights organisations, bar associations, medical chambers, and independent professional organisations to conduct regular and independent prison monitoring places even greater responsibility on official oversight mechanisms. Civil society monitoring should not be an alternative to official oversight, but a complementary safeguard that enables institutional findings to be verified against different sources of information and brings to light problems overlooked by official mechanisms. Under current conditions, where civil society cannot conduct independent on-site monitoring and official mechanisms remain inadequate, it becomes more difficult to document and remedy human rights violations, hold those responsible accountable, and prevent similar violations from recurring.

Taken together, these findings demonstrate that the problems are not limited to isolated administrative shortcomings, but reflect systemic problems in the handling and resolution of applications. The failure to respond, unreasoned responses, limited on-site inspections, reliance on referrals, inconsistent application of common oversight standards, and lack of transparency prevent effective and independent scrutiny of the administration's acts and practices. As a result, while complaint mechanisms remain formally available, violations in prisons remain invisible, remedies for the harm suffered become significantly more difficult to obtain, and institutional practices that perpetuate impunity emerge.

Recommendations

To prevent human rights violations in prisons, reduce the risk of impunity, and guarantee prisoners' right to an effective remedy, the following measures should be taken:

- Applications must receive effective, reasoned, and timely responses: Responses should not be limited to formal citations of legislation. All applications should be concluded within a reasonable period through reasoned responses that assess the allegations raised and the specific facts of each case.
- On-site inspections and confidential interviews must become standard practice: Oversight mechanisms authorised to conduct on-site monitoring should not limit their examinations to reviewing case files. Depending on the nature of the allegations, they should conduct announced or unannounced prison visits and interview prisoners under conditions in which prison staff can neither hear nor see them.
- Follow-up on referred applications must be guaranteed: Any mechanism referring an application to another institution should monitor its progress and the actions taken by the relevant institution, and communicate the final outcome, together with the reasons, to the applicant.
- National monitoring standards must be established to ensure consistency in practice: A common oversight methodology consistent with the Nelson Mandela Rules and the standards of the European Committee for the Prevention of Torture should be implemented to address differences in practice between boards.
- Protection against reprisals and the safety of applicants must be guaranteed: Protective mechanisms should be established to prevent prisoners who exercise their right to seek remedies from being subjected to administrative sanctions, disciplinary penalties, or ill-treatment.

- Public transparency and the disclosure of disaggregated data must be ensured: Monitoring reports, together with anonymised and disaggregated data on applications, examinations conducted, findings of violations, and measures taken, should be made publicly accessible on a regular basis.
- The independence and pluralism of oversight mechanisms must be guaranteed: The structure of these mechanisms, the procedures for selecting their members, and their working processes should be regulated to ensure that they can operate free from administrative and political influence. The participation of civil society, professional organisations, and human rights experts should also be guaranteed.
- Obstacles to independent civil society monitoring must be removed: Bar associations, professional organisations, and human rights organisations should be able to conduct independent prison monitoring without the existing barriers to such activities.

The closed nature of prisons makes it difficult to identify, document, and prevent human rights violations occurring within them. Independent prison oversight is therefore not a matter that can be left to administrative discretion, but one of the fundamental safeguards of the state's obligation to protect prisoners' rights. However, this safeguard cannot be secured merely by defining oversight mechanisms in legislation and establishing them institutionally. What ultimately matters is that allegations of human rights violations are independently investigated, prisoners' experiences and testimonies are incorporated into oversight processes, the conclusions reached are supported by reasons, and efforts to remedy identified problems are monitored. Otherwise, oversight risks becoming a merely formal procedure rather than a safeguard capable of exposing human rights violations and contributing to their remedy.

For any complaints, suggestions or comments, please contact us at geribildirim@cisst.org.tr

Civil Society in the Penal System Association

Caferağa Mah. Sakız Gülü Sk. Kazdal Apt.

No:28 D:8 Kadıköy, İstanbul 34710

+90 216 450 50 05

Online:

info@cisst.org.tr

www.cisst.org.tr

@cisssdernegi

