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Public-Private Partnership Model of Correctional Institution: A Comparison Study in Various Countries

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Abstract

This study highlights that Public-Private Partnership (PPP) in correctional institution is not only represented by privatization or private, but is represented by various patterns of private involvement in correctional institution PPP models. Through an exploratory approach in the literature, this study identifies four correctional institution PPP models based on the experience of various countries, namely the "privatization" model, the "hybrid management" model, the "service infrastructure" model, and the "contracting out certain limited functions" model. The characteristics of the four correctional institution PPP models are identified through their similarities and differences based on the scope of private involvement in correctional institution construction and operation. Only the "privatization" model allows private involvement in all aspects of correctional institution development and operation, while the other three PPP models allow private involvement in certain aspects while still positioning the government to control management and custody aspects. The emergence of the three correctional institution PPP models other than "privatization" is the result of the adaptation of the consideration and/or application of the "privatization" prison PPP model.

Keywords: Correctional Institution, PPP Models, Privatization, Hybrid

1. Introduction

Public-Private Partnerships (hereafter PPP) continue to grow in popularity globally in the provision of infrastructure based on private finance (Hodge & Greve, 2017). PPPs have made significant inroads in certain public management sectors, including social infrastructure such as schools, hospitals, correctional institution, etc (Bergere, 2016). Internationally, PPPs in correctional institution have been introduced by governments as an alternative procurement methodology to get better results from the construction, management and operation of prisons (Dixon, et al., 2005; Liu & Wilkinson, 2014). PPPs in correctional institution are not only popular among high- and middle-income countries, but also among low-income countries. Low-income countries have shown increasing interest in the potential benefits of PPPs in correctional institution over the past few years (Allen & English, 2013).

The most widely discussed form of PPP in correctional institution today is what is popularly called private correctional institution (Schneider, 1999). Several PPP's correctional institution studies have shown the existence of private correctional institutions or correctional institution privatization in countries that implement it such as the United States (Schneider, 1999; Gilroy, 2010) and Australia (O'Neill, et al., 2020). However, in fact, PPP practices in correctional institution implemented by various countries do not show a single characteristic. PPP practices are not only manifested in the existence of private correctional institution, which are usually built with PPP as a method of providing infrastructure based on private finance, but also in the provision of various correctional institution services. The boundaries between the public and private sectors have never been so sharply drawn, and even modern democracies in Europe have always relied on the involvement of some private actors in correctional institution services (such as catering) or long-standing cooperation with private companies that use and profit from correctional institution labor to produce goods on the premises (Daems & Vander Beken, 2018).

Although still very limited, there are some studies that examine alternative forms of PPP's correctional institution (other than private correctional institution). Leighton (2014), for example, describes the form of PPP's correctional institution in Japan that is different from private correctional institutions. According to him, the Japanese form of PPP's correctional institution provides for the government to retain control over correctional institutions. In their comparative study, Liu & Wilkinson (2014) examined two different PPP's correctional institution projects, namely design-build-finance-operate (DBFO) and design-build, finance-maintain (DBFM) projects. In DBFO projects, the private sector provides a full package of services related to correctional institution operations (including custody services), while in DBFM projects, the public sector remains responsible for providing core services (Liu & Wilkinson, 2014). The DBFO project mentioned by Liu & Wilkinson (2014) refers to a form of prison privatization represented in private prisons, while the DBFM project refers to other forms of PPP's correctional institution (other than privatization).

Among the still very limited studies on PPP's correctional institution, there is no study that presents the diversity of prison PPP forms comprehensively. Therefore, this study will present the existence of various models of PPP's correctional institution based on the experiences of various countries. The existence of various PPP's correctional institution models will be analyzed for similarities and differences based on the scope of private involvement in correctional institution construction and operations. In addition, the existence of various PPP's correctional institution models will be analyzed based on the beginning of the emergence of the PPP model.

2. Method

The method used in this research is a literature study. The author traces various literature sources (books, journal articles, theses, etc.) containing information related to Public Private Partnership (PPP) and correctional institution with an exploratory approach. Through content analysis, information on PPP's correctional institution from various sources is categorized based on patterns of PPP's correctional institution. The patterns of PPP's correctional institution are identified by this study as PPP's correctional institution models that have similarities and differences in characteristics. Then, the categorization of the PPP's correctional institution models is further explored by analyzing the initial emergence, spread and adaptation.

3. Results

3.1. PPP's Correctional Institution Practices in Various Models

Various PPP practices in correctional institution have been implemented by various countries, including the United States (Schneider, 1999; Stephenson, 2020), the United Kingdom (NAO, 2003), Australia (English & Baxter, 2010; Liu & Wilkinson, 2014; O'Neill, 2020), France (Bergere, 2016), Canada (Buitenhuis, 2013), and Japan (Leighton, 2014). Various PPP practices in correctional institution in these countries can be categorized into several PPP's correctional institution models that show alternative models of private participation in correctional institution services (Grimsey & Lewis, 2004; Cabral & Saussier, 2013) or private contracting models in correctional institution (Allen & English, 2013). In addition to mentioning the private contracting model in correctional institution, Allen & English (2013) also mention the spectrum of PPP's correctional institution.

The basis for categorizing the PPP's correctional institution model is the role of the private sector in correctional institution management or the provision of correctional institution services. The concept of PPP is used by these authors as a strategy for managing correctional institution or providing correctional institution services. Grimsey & Lewis (2004) discuss PPP in correctional institution with an explanation of the structure of cooperation agreements between the public (government) and the private sector in the provision of correctional institution services. In an article entitled "PPP in Prison Construction and Management," Allen & English (2013) clearly state that PPP is used in correctional institution construction and management. Then, Cabral & Saussier (2013) clearly confirmed that PPP is used in correctional institution management with their article entitled "Organizing Prisons through Public-Private Partnerships: a Cross-Country Investigation."

Alternative models of private sector participation in correctional institution services according to Grimsey & Lewis (2004) consist of: 1) the UK PFI "design-construct-maintain-finance" (DCMF) model; 2) the French mixed management "design-construct-finance" (DCF) model; and 3) the service infrastructure model. Models of private participation in correctional institution services according to Cabral & Saussier (2013) are: 1) correctional institution privatization in the US; 2) delegation of non-core activities in correctional institution services in France; and 3) the Brazilian experience which is a model between the US and France. The private contracting model or PPP spectrum in correctional institution according to Allen & English (2013) consists of: 1) full-scale model; 2) hybrid model; and 3) contracting out certain limited functions.

Based on the explanation of each type of PPP's correctional institution model according to the three sources, the researcher found that there are similar characteristics in several types of PPP's correctional institution models that are packaged in different terminology. The UK PFI "DCMF" model according to Grimsey & Lewis (2004) has the same characteristics as the American correctional institution privatization model according to Cabral & Saussier (2013) and the full-scale model according to Allen & English (2013). Similar characteristics are also shared by the French mixed management "DCF" model according to Grimsey & Lewis (2004), the delegation of non-core activities model in French prison services according to Cabral & Saussier (2013) and the hybrid model according to Allen & English (2013). However, the service infrastructure model and the model of contracting out certain limited functions have different characteristics. Therefore, based on the experience of various countries, PPP's correctional institution models can be categorized into four (4) types, namely: 1) "privatization" model; 2) "hybrid management" model; 3) "service infrastructure" model; and 4) "contracting out certain limited functions" model. The explanation of the four types of PPP's correctional institution models is as follows:

1) The "Privatized" PPP's Correctional Institution Model

The "privatized" PPP's correctional institution model (UK PFI DCMF model or full-scale model) is characterized by the transfer of all (full delegation of) prison services to the private sector and the management of correctional institution operations by private companies. Under the "DCMF" model, the private sector designs, constructs, finances and manages prisons (Grimsey & Lewis, 2004). Under the full-scale model, private companies are contracted to build and run the entire correctional institution where a private company or consortium finances, designs, constructs and manages the correctional institution for an agreed period of time, usually 25 or 30 years (Allen & English, 2013). According to Allen & English (2013), all staff (including custodial and security staff) are employed by the private company with the public sector's role limited to monitoring the company's compliance with the contract. The "privatized" PPP's correctional institution model has been used in the United States, the United Kingdom, and some Australian states.

In the UK context, Grimsey & Lewis (2004) describe some of the features that apply in the privatization model. There is usually a contract of up to 25 years between the Minister for Corrections and a company set up by a private entity as a special purpose vehicle (SPV) to carry out the project. The SPV enters into fixed-price turnkey, fixed-term design and construction (D&C) contracts and also negotiates fixed-price, fixed-term operating contracts with prison operators. The capital cost of construction works is raised through non-resource debt on the basis of payments made by the government for the inmates handled. No payment is made until the correctional institution is put into operation and certain service standards are met.

2) "Hybrid Management" PPP's Correctional Institution Model

The "hybrid management" PPP's correctional institution model (mixed management "DCF" model or non-core activity delegation model) emphasizes that the core responsibility of the correctional institution in the management and control of corrections is the responsibility of civil servants (public sector). Under the "DCF" model, the private sector designs, constructs and finances correctional institution and manages limited correctional institution services, but excludes correctional institution operations and custody services which are the task of the public sector (Grimsey & Lewis, 2004). Grimsey & Lewis (2004) mention that specialized correctional institution services to be provided by the private sector include hostelry (food, hygiene, and cleaning services), reentry services, medical care. Cabral & Saussier (2013) mention industry, education, catering (including staff facilities), medical, maintenance, vocational training, and transportation as the scope of correctional institution services that can be provided by the private sector.

In the hybrid model, private companies finance the construction of new correctional institution and perform certain functions within them such as maintenance, health care, catering, or the provision of rehabilitation activities (Allen & English, 2013). Allen & English (2013) suggest that the cooperation arrangement in the hybrid model is governed by two contracts, one to build the correctional institution facility and the other to operate the correctional institution or to provide certain services. Private operators are initially invited to tender for the construction of new correctional institution on a design and build basis together with the operation of specialized correctional institution services (Grimsey & Lewis, 2004). Funds to pay for the construction of new correctional institutions are raised by the private sector and the state pays the capital costs periodically in addition to the fees charged by the private sector to provide the specified services (Allen & English, 2013).

3) The "Service Infrastructure" PPP's Correctional Institution Model

The "service infrastructure" PPP's correctional institution model is described by Grimsey & Lewis (2004) developed by the State of Victoria (Australia) under the "Victoria Partnership" Program in 2001. The services provided by the private sector partner are infrastructure plus ancillary services, namely accommodation, security systems, environmental management, transportation and information systems management. The private sector is responsible for all aspects of the overall design and construction work, including structural integrity, circulation spaces, foundations, air conditioning and so on. Core services, under the control of the public sector and excluded from the cooperation contract, are billeting (cleaning/laundry/catering), industrial and custody operations. In addition to these core services, the services excluded from the contract are those potentially provided by the private sector, namely medical, education, employment and vocational training.

4) "Contracting Out Certain Limited Functions" PPP's Correctional Institution Model

In the "contracting out certain limited functions" prison PPP model, as described by Allen & English (2013), certain functions within the prison are delegated to private companies, for example catering, maintenance, provision of regime activities or transportation. Contracts are usually for a much shorter period (e.g. 5 years) than in the full-scale and hybrid models. Correctional institution construction (if new), security and custody functions remain the responsibility of the public sector. According to Allen & English (2013), this model is used in the Netherlands and various other European countries.

3.2. Mapping of PPP's Correctional Institution Models Based on Prison Construction and Operation

Based on the information about the four PPP's correctional institution models described earlier, it can be seen that there are similarities and differences between the four PPP models. These similarities and differences need to be further identified in order to provide a more comprehensive explanation. The identification of similarities and differences between the four PPP's correctional institution models can be done by mapping based on certain categorizations.

The basis of the mapping can refer to the categorization of infrastructure types presented by Yescombe & Farquhanson (2018). According to them, infrastructure consists of hard infrastructure, which takes the form of buildings and other supporting facilities; and soft infrastructure, which takes the form of services. Hard infrastructure can be provided through development activities, while soft infrastructure can be provided through

operations. For this reason, the mapping of the PPP's correctional institution model can be done based on the categorization of the construction and operation stages of the prison. The following are the mapping results:

Table 1: Mapping of PPP's Correctional Institution Models based on Construction and Operation

PPP's Correctional Institution Model	Private Role		Contract Characteristics
	Correctional Institution Construction	Correctional Institution Operation	
The "Privatization" Model	Designs, builds and finances the prison building	All services within the prison	<ul style="list-style-type: none"> - Integrated contract for the construction and operation of all services - Contract term is usually 25 or 30 years
The "Hybrid Management" Model	Designs, builds and finances the prison building	Building prison services except custodial services. <ul style="list-style-type: none"> - hostelry services (food, hygiene, cleaning services) - health services - education - vocational and job training - reentry services - industry - transportation - building maintenance (facility management) 	<ul style="list-style-type: none"> - 2 separate contracts (1 contract to build and maintain prison buildings; and 1 contract to operate the prison or to provide certain services) - Contract term of about 10 or 15 years
The "Service Infrastructure" Model	Designs, builds and finances the prison building	Building maintenance (accommodation services)	<ul style="list-style-type: none"> - 1 integrated contract for the construction and maintenance components of prison buildings - Contract term of about 10 years
The "Contracting Out Certain Limited Functions" Model	-	Certain limited functions, such as: <ul style="list-style-type: none"> - catering - building maintenance - provision of regime activities 	Shorter contract term (e.g. 5 years) than other PPP models

Source: author's processed results (2024)

Referring to the table above, there are 3 (three) PPP's correctional institution models that regulate the involvement of the private sector in the construction of (new) correctional institution, namely the "privatization," "hybrid management", and "service infrastructure" models. The three PPP's correctional institution models have similar characteristics in the aspect of correctional institution construction, including in terms of the characteristics of the contract for correctional institution construction. The contract for correctional institution construction in all three PPP's correctional institution models provides for the integration of the role of the private sector in constructing and maintaining prison buildings. Only the "contracting out certain limited functions" PPP's correctional institution model does not regulate the involvement of the private sector in correctional institution construction. However, the "contracting out certain limited functions" PPP's correctional institution model also regulates the involvement of the private sector in the maintenance of correctional institution buildings that are not integrated with its construction.

Then, among the four PPP's correctional institution models, only the "privatization" model regulates private involvement in the entire service provision (the entire operation of the prison). The other three PPP models differ in the type of services provided in the framework of the correctional institution operation phase. The "infrastructure services" PPP's correctional institution model only allows the private sector to be involved in the maintenance of correctional institution buildings (often referred to as facilities management). The "contracting out certain limited functions" PPP's correctional institution model allows the private sector to engage in correctional institution building maintenance services, food services and the provision of certain activities. The "hybrid management" PPP's correctional institution model allows the private sector to be more involved in almost all correctional institution services, except custody.

3.3. Early Emergence of PPP' Correctional Institution Models

The existence of PPP's correctional institution, in its various models, can be traced from the beginning of its implementation by various countries. This can be illustrated by the early emergence of various PPP's correctional institution models whose characteristics have been described in the previous section. In order to elaborate on the emergence of the PPP's correctional institution model, it is very important to determine the initial time limit for its emergence. Since the 1980s, private profit-making (commercial) enterprises have played an increasing role in correctional institution systems around the world (Allen & English, 2013). Therefore, the time limit of the early emergence of the PPP's correctional institution model that the researcher determined is since the 1980s. All PPP's correctional institution models can be considered to have emerged since that time.

The "privatized" PPP's correctional institution model was implemented starting in the 1980s in the United States (Jing, 2010; Cabral & Saussier, 2013; Macaulay, 2013; Stephenson, 2020) in prisons known as private correctional institutions. The first experience of correctional institution privatization in America occurred in the State of Tennessee in 1983 (Cabral & Saussier, 2013) which was managed by a private company called Correction Corporation of America (CCA) (Kertner & Prior, 2012 in Macaulay, 2013). CCA reportedly offered to invest \$250 million in new (private correctional institution) facilities to receive \$170 million per year to manage the system which was the size (average) of the then state budget for correctional institutions (Schneider, 1999).

Following 1983, which was identified as the initial moment of adoption of the "privatized" PPP's correctional institution model in the United States, 1990 was identified by Sands, et al. (2019) as the initial moment of adoption of the "privatized" PPP's correctional institution model in Australia. The private correctional institution experience in Australia began in Queensland in 1990 (Moyle, 2000 in Sands, et al., 2019). Two years after Australia's initial momentum (Queensland) in implementing the "privatized" PPP's correctional institution model in 1990, the UK began implementing the model at The Wolds Prison. In the UK, the first private correctional institution (The Wolds) opened in May 1992 with a capacity of 320 people managed by a private company called G4S (Harding, et al., 2019).

In 1990, while the "privatization" PPP's correctional institution model was first implemented in Australia (Queensland), the "hybrid management" PPP's correctional institution model was introduced in France. The first correctional institution in France to use the hybrid management model was built in 1990 followed by others during the first decade of the 21st century (Cabral & Saussier, 2013). Referring to Daems & Vander Beken (2018) and Harding, et al (2019) that correctional institution in France that use a hybrid management model are called "semi-private correctional institution".

Referring to Allen & English (2013), the "hybrid management" PPP's correctional institution model is not only applied by France, but also by Japan. In Japan, Mine Rehabilitation Program Center was the first PPP's correctional institution established in 2007 using the hybrid model (Byrne, et al., 2019). Mine Rehabilitation Program Center is the first type of correctional institution in Japan to be operated through cooperation between the public and private sectors using PFI (Private Finance Initiative), which is a method of utilizing private capital and expertise in the construction, maintenance and operation of public institutions. The scope of operations entrusted to the private sector includes inmate monitoring, vocational training and physical inspection. The central (national)

government remains the main service provider and assumes the entire responsibility of administrative tasks related to correctional institution management.

The "service infrastructure" prison PPP model, referring to Grimsey & Lewis (2004), was implemented after 2001 in the State of Victoria (Australia). The "service infrastructure" PPP's correctional institution model, identified by Grimsey & Lewis (2004), has the same characteristics as the post-2000 Victorian PPP's correctional institution model according to English & Baxter (2010). The post-2000 Victorian PPP's correctional institution model utilizes a facility service agreement where the private contractor is only responsible for the construction of the correctional institution and the provision of limited services (maintenance) (English & Baxter, 2010). Referring to English & Baxter (2010), Sands, et al. (2019) and O'Neill, et al. (2020), the PPP's correctional institution that used or implemented the "service infrastructure" in the post-2000 period was Marngoneet Correctional Centre (also known as Lara) and Melbourne Remand Centre (also known as Ravenhall) commissioned under the Bracks Government.

Since 2006, referring to Buitenhuis (2013), the "service infrastructure" PPP's correctional institution model has been considered for implementation in the Province of Ontario (Canada). The characteristics of the "service infrastructure" PPP's correctional institution model can be found in Buitenhuis' (2013) description of an alternative PPP model for providing correctional institution under the Alternative Financing and Procurement strategy. The strategy allows the private sector to undertake the financing, design, construction and maintenance of prisons owned and operated by the government. Examples of prisons built under this alternative PPP model are the Toronto South Detention Center which opened in 2013 and the South West Detention in 2014 (Buitenhuis, 2013).

As for the PPP's correctional institution model "contracting out certain limited functions," as stated by Allen & English (2013), it is implemented by the Netherlands. However, after conducting a further literature search, the researcher did not find any sources stating that the Netherlands applies the PPP's correctional institution model of "contracting out certain limited functions." Based on Reynaers & Panakker (2016) and Van Herck (2016), the PPP's correctional institution model applied in the Netherlands refers more to the "service infrastructure" where a private consortium is responsible for the design, construction and maintenance of correctional institution facilities. Design, Build, Finance, Maintain & Operate (DBFMO) is the most common contract type for PPP projects in correctional institutions used in the Netherlands, Belgium and the UK where the letter O can represent different "options," which facility services only (Netherlands and Belgium) or also includes correctional institution guards and/or other staff (UK) (Van Herck, 2016). Excluded from the contract (PPP's correctional institution in the Netherlands) are supervision and application of sanctions; provision of psychological or physical assistance; and provision of daily activities (Reynaers & Panakker, 2016).

However, there is information that the PPP's correctional institution model of "contracting out certain limited functions" is used in the State of Victoria (Australia). Prior to implementing the "privatization" PPP's correctional institution model in 1996, as stated by Sands, et al (2019), Victoria had actually implemented the "contracting out certain limited functions". Prior to the election of the Kennet Government in 1992, several corrections programs, including correctional institution industries, health services, dental health, education, recreation and personal development programs, had been outsourced to various service providers that included the private sector, not-for-profit agencies and contractors (Sands, et al., 2019).

In addition to Victoria (Australia), the UK was also identified as having implemented a PPP's correctional institution model of "contracting out certain limited functions." Since 2012, the UK has focused on an alternative model where key custodial functions would be retained by the public sector with rehabilitation and ancillary services contracted out through competition (Grimwood, 2014: 6). Penal Reform International (2015: 24) also states that the UK has recently moved from a "wholesale" privatization approach to outsourcing certain correctional institution components such as facility management.

Based on the information that has been submitted, it can be seen that the "privatization" PPP's correctional institution model has been used since the 1980s by the United States and since the 1990s by Australia and the United Kingdom. The "hybrid management" PPP's correctional institution model has been used since 1990 by France and since 2007 by Japan. The "service infrastructure" PPP's correctional institution model has been used

since 2001 by the State of Victoria (Australia) and since 2013 by the Province of Ontario (Canada). The "contracting out certain limited functions" PPP's correctional institution model has been used since before 1992 by Victoria (Australia) and since 2012 by the United Kingdom.

This information can be used as material for compiling the initial sequence of the emergence of various PPP's correctional institution models. Since the 1980s, the existence of PPP's correctional institution can be identified in a sequential model:

Table 2: Early Emergence of PPP's Correctional Institution Models

PPP Model Time Lapse Early Emergence First Country to Implement	PPP Model Time Lapse Early Emergence First Country to Implement	PPP Model Time Lapse Early Emergence First Country to Implement
"Privatization" model since the 1980s United States (State of Tennessee)	"Privatization" model since the 1980s United States (State of Tennessee)	"Privatization" model since the 1980s United States (State of Tennessee)
"Hybrid management" model Since the 1990s France	"Hybrid management" model since the 1990s France	"Hybrid management" model since the 1990s France
"Service infrastructure" model since 2000s Australia (State of Victoria)	"Service infrastructure" model since 2000s Australia (State of Victoria)	"Service infrastructure" model since 2000s Australia (State of Victoria)

Source: researcher processed results (2024)

Information on the "contracting out certain limited functions" PPP's correctional institution model is not presented in the table above given that there is no valid information regarding the timing of the initial appearance. In the study of Sands, et al. (2019), there is indeed information that a PPP's correctional institution model (the characteristics of which lead to a specific limited function contracting out model) has been implemented by Victoria before 1992, but the certainty of the time before 1992 cannot be known. In addition, given the characteristics of the "contracting out certain limited functions" PPP's correctional institution model which only involves the private sector in certain functions (or services) and does not include the construction of new correctional institution infrastructure, it can be estimated that many correctional institutions in various countries have implemented this model.

4. Discussion

4.1. The Emergence of the PPP's Correctional Institution Model as a Result of Deployment

As previously noted, the "privatized" PPP's correctional institution model is not only applied in the United States, but also in the United Kingdom, Australia and Canada. The emergence of the "privatized" PPP's correctional institution model in the UK, Australia and Canada cannot be separated from the process of spreading the model that has been applied previously by the United States. Thus, the existence of PPP's correctional institution can be reviewed through the dissemination process. The review can provide information on the contribution of the application of a PPP's correctional institution model in one place to another place. The context of different places can be interpreted within the same country or within different countries (cross-country).

After first being implemented in the United States (State of Tennessee) in 1983, the "privatized" PPP's correctional institution model was widely implemented by various states in the United States. The spread of the application of the "privatized" PPP's correctional institution model has occurred in the United States with the increasing number of private correctional institution and prisoners housed in private prisons in the United States. At the turn of the century, only 19 of the 50 states in the United States did not have private correctional institutions (Newburn, 2010). There has been an overall increase in the number and proportion of prisoners in private correctional institution in

the United States with approximately 128,323 prisoners in private prisons, representing 8.5% of the total prison population (Kim, 2022). According to Newburn (2010), the rapid growth of private prisons in the United States is attributed to commercial lobbying in a large and diverse market.

Along with the spread of the implementation of the "privatized" PPP's correctional institution model to various states in the United States (other than the State of Tennessee), the spread also occurred to various countries outside the United States, including the United Kingdom. Within a decade of the emergence of American privatized facilities, the UK also began to allow the private sector to build and run correctional institution (Newburn, 2010). The UK was the first European country to use private correctional institutions (Daems & Vander Beken, 2018). The emergence of private correctional institutions in the UK, which occurred several years after private correctional institutions began to develop in the United States, was influenced by the involvement of Wackenhut (a private company) and other major players in the United States in the consortium surrounding the UK government in the 1980s and early 1990s, and the work of closely related think tanks (the Heritage Foundation in the United States and the Adam Smith Institute in the UK) in promoting the idea of private correctional institution to the UK Government (Newburn, 2010).

The growth of private correctional institution facilities in the UK has been relatively rapid (Newburn, 2010). There are 14 private correctional institutions in the UK which house around 15% of the country's correctional institution population, an even higher proportion than the United States which only houses 9% of prisoners in private prisons (Zedner, 2018). With the rapid growth of private correctional institutions, the UK soon caught up and overtook the United States in the commercialization of punishment (Wacquant, 2009). Wacquant (2009) notes that the state played a much more important role in determining the growth of private correctional institutions in the UK than in the US. Unlike in the United States, private correctional institutions in the UK are part of the same government regulatory regime that controls government-run correctional institutions (Newburn, 2010). From 1992 to 2012, correctional institutions were assigned to private or public entities following a "market test" that invited private and public entities to compete against each other for its management (Daems & Vander Beken, 2018). According to Newburn (2010), the rapid growth of private correctional institution facilities in the UK is due to the centralized nature of the system or much greater central control over correctional institution policy, rather than commercial lobbying in a large and diverse market as is the case in the United States.

In the UK, the PPP model of "privatized" correctional institution is not only applied to newly built private building, but also to existing correctional institution previously operated by the government. This was the case with Birmingham Prison which according to Liebling & Ludlow (2017) was transferred from public to private management (i.e. G4S Company) in October 2011. This was the first time an operating public correctional institution was privatized in the UK (Liebling & Ludlow, 2017).

The spread of the implementation of the PPP model of "privatized" correctional institution has also occurred in Australia with the emergence of a number of private correctional institution in various states. A key feature of the Australian private correctional institution experience is the use of PPPs to facilitate the establishment and expansion of private correctional institution (O'Neill, et al., 2020). Queensland's experience of applying the privatization model to its private correctional institution, as noted by Sands, et al (2019), was followed by New South Wales in 1993, South Australia in 1995, and Victoria in 1996. Among these Australian states, according to Sands et al (2019), Victoria has the highest proportion of prisoners in private correctional institution in the world.

Referring to O'Neill, et al. (2020), the PPP model of "privatized" correctional institution began to be implemented in Victoria during the Kennet Government which since 1983 has announced the offering of private correctional institution construction to the private sector. Deer Park Metropolitan Women's Correctional Centre was identified by Sands, et al. (2019) and O'Neill, et al. (2020) as the first private correctional institution in Victoria which opened in August 1996. Two other private correctional institutions followed, with Fulham Men's Correctional Centre opening in March 1997 and Port Philip Prison in September 1997 (Sands, et al., 2019; O'Neill, et al., 2020). The new private correctional institution were built on Crown land and the facilities were owned by contractors (English & Baxter, 2010).

The spread of the implementation of the "privatized" PPP's correctional institution model also reached Canada. Referring to Buitenhuis (2013) and Harding, et al. (2019), the Province of Ontario (Canada) opened its first private prison called Central North Correctional Centre (CNCC) in 2001. CNCC is operated by Management & Training Corporation, the world's third-largest US-based private adult correctional institution operator (Buitenhuis, 2013). According to Buitenhuis (2013), the private operation of CNCC was based on the direction of Rob Sampson (Minister of Correctional Service in 1999 who was previously the minister responsible for privatization) who had visited various private correctional institution in the United States and the United Kingdom to study best practices and business cases of private prisons.

Compared to other PPP's correctional institution models, information on the spread of the "privatized" is more easier to find in various sources. It is very difficult to obtain information related to the spread of PPP's correctional institution models other than "privatization." As stated by Allen & English (2013), the "hybrid management" PPP's correctional institution model is not only implemented by the UK, but also by Japan. However, to date, there is no source that informs that the emergence of the "hybrid management" PPP's correctional institution model in Japan is the result of the spread of the implementation of the model in France. The same applies to the spread of the "service infrastructure" PPP's correctional institution model. There is no information indicating that the emergence of the "service infrastructure" PPP's correctional institution model in Ontario (Canada) is the result of the spread of the implementation of the model in Victoria (Australia).

The spread of the "hybrid management" PPP's correctional institution model is identified as occurring internally within the same country. This can be seen from the development of its application in France and Japan. Referring to Bergere (2016), in 2013, there were thirteen prisons in France that implemented the "hybrid management" PPP's correctional institution model. Then Japan, referring to Leighton (2014), has four correctional institutions implementing the "hybrid management" PPP's correctional institution model, one of which is the Shimane Asahi Rehabilitation Center. In addition to being implemented for the first time at Mine Rehabilitation Center (in 2007), the "hybrid management" PPP's correctional institution model in Japan has also implemented in three other prisons.

The spread of the "service infrastructure" PPP's correctional institution model was also identified to occur internally in Victoria (Australia). There is information indicating that Victoria (Australia) continues to implement the "service infrastructure" PPP's correctional institution model. In Liu & Wilkinson's (2014) study, the character of the "service infrastructure" PPP's correctional institution model can be found in Ararat Prison, which according to Liu & Wilkinson (2014) uses the Design-Build-Finance-Maintain (DBFM) model. Ararat Prison began construction in 2010 under the DBFM scheme where the state signed a project agreement with the Aegis Correctional Partnership consortium responsible for the design, construction and finance of the new building facility and facility management services for 25 years (Liu & Wilkinson, 2014).

4.2. Emergence of PPP's Correctional Institution Models as a Result of Adaptation

The emergence of a particular PPP's correctional institution model is related to the non-application of a previously considered or applied. This phenomenon occurs, both within the same country and across countries. The emergence of a particular PPP's correctional institution model is the result of adaptation to the consideration and/or application of other models. Based on the experience of various countries, the emergence of the "hybrid management," "service infrastructure," and "contracting out certain limited functions" PPP's correctional institution models occurred after considering the application of the "privatization" PPP's correctional institution model. Thus, it can be stated that the three PPP's correctional institutions models other than "privatization" are the result of adaptation of the application of the "privatization."

The practice of the United States in its private correctional institution is taken into consideration by France for private involvement in prisons. The basis for private participation in French correctional institutions was established in 1987 when the 13,000 Program was announced (Lazerges, 1997 in Cabral & Saussier, 2013). Initially, France aimed to adopt the correctional institution privatization model that had been implemented in America (Cabral & Saussier, 2013; Daems & Vander Beken, 2018) where 13,000 correctional institution beds

would be created and privately operated to deal with correctional institution overcrowding issues during times of budget constraints (Cabral & Saussier, 2013). However, due to some political discussions, France did not opt for the American model of correctional institution privatization, but an intermediary solution called hybrid management (Cabral & Saussier, 2013) or "delegated management agreement" (Bergere, 2016).

The French experience can be seen in the Japanese experience, which was also inspired by the PPP model of "privatized" prisons implemented in the United States. Japan studied US private correctional institutions, but the government wanted more control over correctional institutions (Leighton, 2014). For this reason, Japan did not implement a "privatized" PPP's correctional institution model, but that uses Private Finance Initiative (PFI) contracts where the government still controls the correctional institution. The characteristics of the PPP's correctional institution model lead to a "hybrid management" model. Referring to Leighton (2014), correctional institution in Japan that use the "hybrid management" model are PFI correctional institution. PFI correctional institution employees are government employees tasked with overseeing a team of government employees who monitor and enforce contracts with more than a dozen private businesses in the correctional institution (Leighton, 2014). According to Leighton (2014), the Japanese Government deliberately chose to avoid a monopoly and work with several private companies in the same correctional institution to provide their services, including rehabilitation and education programs.

Based on the experience of France and Japan in initiating the implementation of the PPP's correctional institution model, it can be seen that the results of the spread of the "privatized" from the United States to various countries do not necessarily lead to it. In the spread of the "privatized" PPP's correctional institution model, model transformation can also occur. France and Japan both pay attention to or study the "privatized" PPP's correctional institution model implemented by the United States, but both do not necessarily apply the model. Unlike the UK, Australia and Canada, which replicated the US-style "privatized" model, France and Japan made adjustments and then implemented the "hybrid management" model.

The emergence of the "service infrastructure" model as a result of the adaptation of the implementation of the "privatization" model occurred in the State of Victoria (Australia). As previously noted, in 1996, the "privatization" model began to be used by the State of Victoria. Then, the State of Victoria implemented the "service infrastructure" model after the 2000s. The "service infrastructure" model, as stated by Grimsey & Lewis (2004), was implemented by the State of Victoria (Australia) developed under the Victoria Partnership in 2001. Under "Partnership Victoria," correctional institution services are divided into three groups (Grimsey & Lewis, 2004): 1) core services under the control of the public sector and excluded from the contract, namely billeting (cleaning/laundry/catering), industrial and custodial operations; 2) services provided by private sector partners (infrastructure plus ancillary services), namely accommodation, security systems, estate management, transportation, and information systems management; 3) services potentially provided by the private sector, but excluded from the contract from the outset, namely medical, education, employment and vocational training. Based on this division of prison services, the PPP's correctional institution model implemented in the State of Victoria Australia after 2000 (service infrastructure model) has narrowed the authority of the private sector.

There has been a marked contractual simplification in Victorian model in the post-2000 period with the government's decision to remove private sector responsibility for the delivery of core corrections services (English & Baxter, 2010). The "service infrastructure" model, which English & Baxter (2010) identify as the post-2000 model of PPP's correctional institution, uses a different facility service agreement than the correctional institution service agreement used in the "privatized" (pre-2000) model. In pre-2000 contracts, the private contractor is responsible for the design, construction and financing of correctional institution facilities and all aspects of prison services, whereas in post-2000 contracts, the private contractor is only responsible for prison construction and limited service provision (maintenance) (English & Baxter, 2010).

The emergence of the "service infrastructure" model, as a result of the adaptation of the implementation of the "privatized" model, also occurred in the Province of Ontario (Canada). The "privatized" model began to be implemented by the Province of Ontario in 2001. Then, in 2013, the Province of Ontario (Canada) began implementing the "service infrastructure" model. The Province of Ontario (Canada), referring to Buitenhuis

(2013), began implementing the "service infrastructure" model after ending the implementation of the "privatized" model at the Central North Correctional Centre (CNCC). The CNCC began operations in 2001 and ended in 2006 when a new Liberal government was elected under Dalton McGuinty (Buitenhuis, 2013).

The emergence of the "contracting out certain limited functions" model, as an adaptation of the "privatization" model, occurred in the UK. As stated earlier, the UK has been implementing the "privatization" model since 1992. However, there is information that the UK has implemented an alternative PPP's correctional institution model whose characteristics refer to the "contracting out certain limited functions" model. Since 2012, the UK has focused on an alternative model where key custodial functions would be retained by the public sector with rehabilitation and ancillary services contracted out through competition (Grimwood, 2014: 6). The UK has, more recently, moved away from a "wholesale" privatization approach to outsourcing certain correctional institution components such as facility management (Penal Reform International, 2015: 24).

5. Conclusion

The practice of Public-Private Partnership (PPP) in correctional institution does not have a single pattern, but is diverse. The existence of a diversity of PPP's correctional institution patterns is shown in its application in various countries which are identified by this study. Based on the experience of various countries, PPP's correctional institution models consist of the "privatization" model, the "hybrid management" model, the "service infrastructure" model, and the "contracting out certain limited functions" model. The characteristics of the four PPP's correctional institution models are identified through their similarities and differences based on the scope of private involvement in prison construction and operation. Only the "privatization" model allows private involvement in all aspects of prison development and operation, while the other three models allow private involvement in certain aspects while still positioning the government to control management and custody aspects.

Based on the beginning of its emergence, the "privatization" model emerged since the 1980s, the "hybrid management" model emerged since the 1990s, and the "service infrastructure" model emerged since the 2000s. The emergence of the three PPP's correctional institution models other than "privatization" is the result of the adaptation of the consideration and/or application of the "privatization" model. The "privatization" model is not only applied in the United States, but also applied in various countries such as the United Kingdom, Australia and Canada through the process of spread. The "hybrid management" model is applied in France and Japan. The "service infrastructure" model is applied in the State of Victoria (Australia) and the Province of Ontario (Canada). The "contracting out certain limited functions" model is applied in the UK and is possible in many countries because it only involves the private sector in certain functions.

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