Check for updates

Sociology Lens

WILEY

ORIGINAL ARTICLE OPEN ACCESS

Authoritarian Innovation in Prison Labor Governance Under Democratic and Authoritarian Rule

Mustafa F. Özbilgin[1] | Cihat Erbil[2] | Mahan Poorhosseinzadeh[3] | Milena Tekeste[4]

[1]Brunel University of London, London, UK | [2]Ankara Haci Bayram Veli University, Ankara, Turkey | [3]Edith Cowan University, Perth, Australia | [4]Özyeğin University, Istanbul, Turkey

Correspondence: Mustafa F. Özbilgin (Mustafa.Ozbilgin@brunel.ac.uk)

Received: 1 October 2026 | **Revised:** 31 October 2026 | **Accepted:** 9 November 2026

Keywords: authoritarian innovation | democratic innovation | forced labor | historical sociology of punishment | neoliberalism | prison labor

ABSTRACT

Authoritarian innovation has been theorized as a property of regimes that govern without consent. This article argues that it is better understood as a transferable governance practice, observable in democracies and dictatorships alike, and develops the argument through prison labor. Prison labor sits at the junction of state coercion and the labor market, and its governance has for two centuries oscillated between a rehabilitative rationale grounded in rights and a coercive rationale grounded in extraction and control. Drawing on the historical sociology of punishment and illustrative examples from 13 countries, we separate two questions the literature conflates, regime type and innovation type, and propose a matrix that crosses democratic and authoritarian rule with democratic and authoritarian innovation. Three mechanisms carry authoritarian innovation into democratic settings: the commercialization of incarceration, legal exceptions that suspend labor rights at the prison gate, and crisis framings that convert prisoners into an emergency workforce. In authoritarian settings, rehabilitative programs for ordinary offenders operate as segmented rehabilitation that legitimates coercion against political prisoners. The article decouples authoritarian innovation from regime type, specifies how it travels, and draws out implications for the international standards meant to hold the line between prison work and forced labor.

1 | Introduction

When wildfires swept through Los Angeles in January 2025, incarcerated crews were among those fighting them, in a state where prisoners can make up nearly a third of the wildland firefighting force, working for a few dollars a day under the exception clause that the 13th Amendment to the United States Constitution carved out for those convicted of a crime (Melville 2025). The spectacle of incarcerated firefighters on the frontline of a climate emergency in the richest democracy in the world unsettles a widely held assumption in political sociology: that coercive labor extraction by the state is a signature of authoritarian rule. The United States is not an authoritarian regime by any standard classification, yet its prisons sustain a labor regime that the International Labor Organization (ILO) would, outside the prison gate, treat as forced labor. Recent years have seen reports of prisoners recruited from Russian penal colonies to fight in Ukraine (Kurmanaev et al. 2023; Office of the United Nations High Commissioner for Human Rights 2023), of Uyghur detainees transferred from camps in Xinjiang to factories supplying global brands (Xu et al. 2020), and of political prisoners in Iran assigned to unpaid work in state enterprises (Human Rights Activists in Iran 2024). The question this article asks is what these cases share, and what the answer tells us about authoritarian innovation as a concept.

Authoritarian innovation entered the vocabulary of political science through work on Southeast Asia, where it described the deliberate crafting of institutions and practices that secure

This is an open access article under the terms of the Creative Commons Attribution License, which permits use, distribution and reproduction in any medium, provided the original work is properly cited.

© 2026 The Author(s). *Sociology Lens* published by John Wiley & Sons Ltd.

popular support for less democratic forms of rule (Curato and Fossati 2020). Scholars of labor governance have since extended the term to the engineering of labor institutions that disable collective voice while preserving a façade of consultation (Ford et al. 2021; Gillan and Ford 2024), and a recent set of studies has tracked such innovations in India, the United Kingdom, and the United States (Noronha and D'Cruz 2024; Rhomberg 2024; Smismans 2024). That extension already implies a shift that the literature has not fully theorized. If authoritarian innovations can be found in Westminster and Washington, then the concept cannot be a property of authoritarian regimes. It must describe a practice, and practices travel. Glasius (2018) made this point for authoritarian practices in general, defining them by their effect on accountability and voice and not by the regime in which they occur. The present article carries that argument into a domain where it has unusual purchase. Prison labor is a site where even liberal states hold human beings in conditions of total dependence, where the ordinary protections of labor law are suspended by design, and where the rationale offered for work has shifted repeatedly between reform of the prisoner and extraction from the prisoner (Melossi and Pavarini 1981; Rusche and Kirchheimer 1939). It is, in other words, a laboratory in which authoritarian innovation can be observed in regimes of every kind.

Our argument proceeds in three moves. We first reconstruct authoritarian and democratic innovation as governance practices and separate them analytically from regime type, which yields a matrix with four cells: democratic innovation under democratic rule, authoritarian innovation under democratic rule, authoritarian innovation under authoritarian rule, and segmented rehabilitation under authoritarian rule, the position in which rehabilitative forms are adopted without the voice that would make them democratic. We then turn to the history of prison labor to show that this oscillation between coercive extraction and rehabilitative reform is as old as the penitentiary itself, and that international labor standards were written precisely to hold the line between them. The third move is a comparative exploration of contemporary cases, organized by the matrix, which allows us to identify the mechanisms through which authoritarian innovation enters democratic prison systems and the mechanisms through which authoritarian regimes borrow the language of rehabilitation. We draw on secondary sources, official statistics, investigative journalism, and human rights reporting; the cases serve as plausibility probes and the exploration is a form of typological theorizing (George and Bennett 2005), in the tradition of comparative historical sociology that follows institutions through time to understand their present form.

The contribution is twofold. For the theory of authoritarian innovation, we build on a decoupling of authoritarian practice from regime type that Glasius (2018) and the contributions to a 2024 special issue of the *Journal of Industrial Relations* (Noronha and D'Cruz 2024; Rhomberg 2024; Smismans 2024) have already made. Our distinctive contribution lies in the prison labor case, in the matrix that crosses regime type with innovation type, and in the specification of mechanisms: three through which authoritarian innovation enters democratic settings (commercialization, legal exception, and crisis framing) and a reverse mechanism, segmentation, through which authoritarian regimes borrow rehabilitative forms. Segmentation is the most general of these findings, as every system we examine answers the question of who belongs to the governed population to whom accountability is owed, and answers it by race, citizenship, caste, ethnicity, or political offense. For the sociology of punishment, we show that the long debate over whether prison labor reforms or exploits (DelSesto 2021; Hatton 2020; LeBaron 2018) can be reframed as a debate over the direction in which governance innovation is moving, and that this direction is currently toward coercion in several democracies while authoritarian regimes selectively import rehabilitative programs as instruments of legitimation.

2 | Authoritarian Innovation as Practice

The concept of authoritarian innovation was developed to explain a puzzle. Regimes in Southeast Asia that had curtailed competition and dissent nevertheless enjoyed considerable popular support, and that support was not simply the residue of repression. Curato and Fossati (2020) argued that such regimes innovate: they build participatory platforms, consultative bodies, welfare schemes, and anti-corruption drives that respond to real grievances while channeling participation into forms that cannot threaten incumbents. Authoritarian innovation in this account is creative, responsive, and legitimating, which distinguishes it from the older image of authoritarian rule as inert coercion. It also borrows the forms of democratic innovation, a term that had until then referred to institutions designed to deepen citizen participation in decision-making, such as participatory budgeting, citizens' assemblies, and deliberative mini-publics (Asenbaum 2022; Escobar and Elstub 2017).

Democratic innovation has a penal lineage of its own, which the literature on authoritarian innovation has not yet drawn upon. Dzur (2012) traced the participatory tradition in criminal justice from the jury to restorative conferencing and argued that punishment is the domain in which the retreat of lay participation has been most complete and most damaging. Restorative justice programs that bring prisoners, victims, and community members into dialog, prisoner councils with a voice in the running of institutions, and work arrangements that approximate employment contracts are all democratic innovations in the sense of extending voice and contestation to a population held in dependence. The prison is an unusually demanding test for the concept, because the governed population has by definition lost the ordinary civic standing on which participation rests. That is also what makes it an unusually revealing test. If voice and accountability can be extended to prisoners, they can be extended to anyone; if they are withheld from prisoners in a democracy, the withholding tells us something about where the boundary of the demos is drawn and by whom.

Labor governance proved a fertile field for the concept. Ford et al. (2021) showed how Cambodia built a trade union law and an arbitration council that looked like institutions of industrial democracy while functioning to fragment unions and deter strikes. Gillan and Ford (2024) traced the failure of similar innovations in Myanmar once the military dispensed with the need for legitimation. The decisive step came when the same lens was turned on democracies. Rhomberg (2024) found

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jobs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

authoritarian innovation in the dual subnational systems of labor governance in the United States, where right-to-work states hollow out collective bargaining under cover of individual freedom. Smismans (2024) traced it in the post-Brexit United Kingdom, where executive power over labor standards expanded while consultation was reduced to ritual. Noronha and D'Cruz (2024) found it in India's labor codes, which consolidated protections on paper while raising the thresholds that trigger them. In each case, the innovation is a redesign of institutions that preserves the appearance of voice and accountability while draining their substance.

Once the concept is applied in democracies, its definition must rest on something other than regime classification. Glasius (2018) offered the most useful formulation. An authoritarian practice, she argued, is a pattern of action that sabotages accountability to people over whom a political actor exerts control, by disabling their voice or by keeping them in the dark about decisions that affect them. Secrecy and the disabling of voice are the two markers. A practice defined in this way can be found in a parliament, a ministry, a corporation, or a prison, whatever the regime in which that institution sits. Glasius (2023) later extended the argument to the transnational level, where authoritarian practices are exercised by states and firms on populations beyond their borders. The practice perspective has a further advantage for our purposes: it makes it possible to speak of the direction in which an institution is moving. A prison system can become more authoritarian in its practices without the state becoming an autocracy, and an autocracy can adopt democratic practices in one corner of its prison system while intensifying coercion in another.

We therefore define authoritarian innovation as the deliberate redesign of governance arrangements in ways that sabotage accountability to a governed population by disabling its voice, withholding information about the decisions that affect it, or extracting labor and compliance under conditions that population cannot contest. Democratic innovation is the deliberate redesign of governance arrangements in ways that extend voice, transparency, and the capacity to contest decisions to a governed population, including populations held in conditions of dependence. Both definitions refer to practices, and both are indifferent to the regime in which the practice occurs. This indifference is what allows us to construct the matrix that organizes the comparative exploration. Along one axis we place regime type, distinguishing democratic from authoritarian rule in the conventional sense, with the recognition that many contemporary regimes are competitive authoritarian hybrids that hold elections while tilting the field (Levitsky and Way 2010). Along the other axis we place the type of innovation observable in prison labor governance. Four cells result, and we treat them as analytical positions on a field through which systems move.

Three criteria give the term innovation its content in this definition. The first is deliberate redesign: a change in rules, institutions, or administrative practice that identifiable actors choose and that can be dated. The second is a legitimating claim: The redesign is presented to the governed population or to a wider public as serving rehabilitation, public safety, fiscal responsibility, or emergency need, which is the element of crafting support that Curato and Fossati (2020) placed at the center of the concept. The third is an effect on accountability, assessed through the markers set out above. Where a practice is long-standing, as with the 13th Amendment's exception clause, the California fire camps, or laogai, the innovation lies in its renewal, extension, or re-legitimation, and we date it accordingly: the extension of fire camp deployment as wildfire seasons have lengthened, the use of the exception clause to defend new forms of private contracting, or the rebranding of reform through labor as vocational training. Practices that meet the first and third criteria while lacking any legitimating claim, such as the camp systems of North Korea and Eritrea, are authoritarian practices in Glasius's (2018) sense without being innovations in Curato and Fossati's sense, and we treat them as the limit case against which innovation can be measured. The criteria also separate the coercion inherent in imprisonment from an innovation that extends it. Confinement and an obligation to engage in some activity are features of imprisonment in every system we discuss. Authoritarian innovation begins where a redesign extends compulsion beyond that baseline, by attaching prison labor to private profit, removing the protections that apply to equivalent work outside, punishing refusal with additional sanctions, or reserving harsher work regimes for particular populations.

The third marker in our definition, the extraction of labor and compliance under conditions the captive population cannot contest, brings the concept close to several existing ones: coerced labor (Hatton 2020), prison labor as unfree labor (LeBaron 2018), carceral capitalism (Pandeli and Longman 2025; Wang 2018), and authoritarian neoliberalism (Bruff 2014). Each of these explains why prison labor is exploitative and whose interests it serves. Authoritarian innovation adds three elements that they leave open. It treats the arrangement as designed, directing attention to the identifiable decisions and actors that produce it. It attends to legitimation, so that the rehabilitative, fiscal, or emergency claims that accompany coercion become part of the explanation in their own right. And it locates the harm in the sabotage of accountability, so that the analytical question becomes who is excluded from the population to whom the institution must answer. This last element links the prison to the wider literature on authoritarian practices and makes segmentation, discussed below, visible as a mechanism.

Rehabilitation and voice are distinct. A program can provide education, training, or counseling while giving prisoners no say in its design or operation. We therefore treat rehabilitative provision as democratic innovation only where it is accompanied by evidence of voice, transparency, or the capacity to contest, such as prisoner councils, representation by prisoner organizations, judicial avenues that prisoners can use, or public reporting. Where rehabilitative provision exists without these, we record it as rehabilitation without voice. This distinction governs the fourth cell of the matrix, which we call segmented rehabilitation to mark that it borrows the form of democratic innovation without its substance.

The movement itself has a political economy. Bruff (2014) coined authoritarian neoliberalism to describe the turn by which states, having failed to secure consent for market-

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jobs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

disciplinary policies, insulated those policies from democratic contestation through constitutional, legal, and administrative means. Bruff and Tansel (2019) extended the concept to the coercive management of populations rendered surplus by economic restructuring, and Hartwell (2026) has argued that the state produced by this turn is leaner in its welfare functions and meaner in its coercive ones, a combination that the prison exemplifies. Prison labor is where authoritarian neoliberalism and authoritarian innovation meet. The prison absorbs the populations that the market discards (Wacquant 2009), and prison labor converts their confinement into a resource, either as revenue for the state, as a subsidy to private firms, or as a disciplinary spectacle that reassures the law-abiding. The innovations that make this conversion possible, from the 13th Amendment's exception clause to public–private partnership contracts, are authoritarian in the practice sense whatever the regime in which they are enacted.

3 | Prison Labor in Historical Perspective

The penitentiary was born as a labor institution. Rusche and Kirchheimer (1939) argued that the forms of punishment in any society correspond to its labor market: when labor is scarce, punishment conserves bodies and puts them to work; when labor is abundant, punishment destroys or warehouses them. The houses of correction of 16th-century Amsterdam and London, the galleys of the Mediterranean monarchies, and the transportation of convicts to colonial plantations were all solutions to a labor problem before they were solutions to a crime problem. Melossi and Pavarini (1981) extended this reading to the 19th-century penitentiary, which they interpreted as a factory for the production of disciplined proletarians, an institution whose architecture and regime trained the body for wage labor. Foucault (1977) placed the same institution within a wider dispositif of discipline in which the prison, the barracks, the school, and the workshop shared a technology of power. In each of these accounts, prison labor is the hinge between punishment and political economy, and the rationale offered for it, whether penitence, reform, or deterrence, is understood as the ideological form of an economic function. Holligan (2018) illustrated the point in the case of Peterhead, the Scottish convict prison opened in 1888 to supply labor for the construction of a harbor of refuge, where punishment, social regulation, and public works were fused in a regime that contemporaries compared to a gulag. Clegg (2020) has shown, against the older assumption that slavery and capitalism were incompatible, that coerced labor can be fully integrated into capitalist accumulation, which is the theoretical ground on which the convict leasing described below, and the contemporary prison labor regimes that inherit its legal form, must be understood.

That reading is powerful but incomplete, because it underplays the second history that runs alongside the first: the history of reform movements that sought to make prison labor serve the prisoner. The Quaker reformers who shaped the Pennsylvania system, the Irish and Australian experiments in graduated release, and the Progressive-era campaigns for vocational training in American prisons all treated labor as a means of restoring the prisoner to civil society. Hiller (1914) documented the opposition of trade unions to convict labor on the ground that it depressed free wages, an opposition that fed the campaigns culminating in the federal Hawes-Cooper Act of 1929 and Ashurst-Sumners Act of 1935, which restricted interstate commerce in prison-made goods. Lippke (1998) later formulated the normative core of the reformist position: Prisoners should retain control over their labor, and compulsion undermines the rights that punishment is supposed to vindicate. The two histories, extractive and reformist, have never been resolved in favor of one or the other. They coexist, and the balance between them at any moment is what we call the direction of governance innovation.

The extractive history produced its own innovations, and two of them are directly relevant to the contemporary cases. The first is convict leasing in the American South after Emancipation. Lichtenstein (1996) and Blackmon (2008) showed how states leased prisoners, overwhelmingly Black men convicted under vagrancy and petty-theft statutes written for the purpose, to mines, railways, and plantations, with annual death rates among Mississippi's convicts ranging between 9 and 16% in the 1880s (Oshinsky 1996, 46). The legal foundation was the 13th Amendment's exception for punishment of crime, and the political foundation was a democratic regime in which the governed population had been disenfranchised. Convict leasing was an authoritarian innovation under democratic rule in the most literal sense: A redesign of criminal law and penal administration that disabled the voice of a racialized population and extracted its labor for private profit. Its legacy persists in the demographic composition of American prisons and in the exception clause itself (Alexander 2010; Childs 2015; Davis 2003). The second innovation is the labor camp of the 20th-century dictatorships. Applebaum (2003) traced how the Soviet Gulag grew from a penal institution into an economic ministry that built canals, felled timber, and mined gold with a workforce of millions; Shaw (1998) traced the parallel development of laogai, reform through labor, in the People's Republic of China, where the ideological rationale of thought reform fused with the economic rationale of production. These were authoritarian innovations under authoritarian rule, and they left the institutional templates that Russia and China still use.

The reformist history also produced its own innovations, and the most consequential were international. The ILO's Forced Labor Convention of 1930 (No. 29) defined forced labor as work exacted under menace of penalty and not offered voluntarily, and it exempted prison labor only on two conditions: That it follow conviction by a court and that it be carried out under the supervision and control of a public authority, without the prisoner being hired to or placed at the disposal of private individuals or companies (International Labour Organization 1930). The Abolition of Forced Labor Convention of 1957 (No. 105) went further, prohibiting forced labor as a means of political coercion, as punishment for holding or expressing political views, as a method of mobilizing labor for economic development, as labor discipline, as punishment for participation in strikes, and as a means of racial, social, national, or religious discrimination (International Labour Organization 1957). Ratification has been uneven. The United States ratified Convention No. 105 in 1991 but has never ratified Convention No. 29, whereas China ratified both conventions in 2022 and Japan ratified Convention No. 105 in the same year. The Protocol of 2014 to Convention No. 29 added obligations of

28325808x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jobs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

prevention, protection, and remedy (International Labour Organization 2014). Convention No. 29 was drafted with colonial forced labor in view, and its prison exemption reflected the assumption, widely shared in 1930, that convict labor under public authority was a legitimate incident of punishment; Convention No. 105 was drafted after the revelations about the Gulag and the labor camps of the Second World War, and its list of prohibited purposes is a catalog of what those regimes had done. These two instruments are the normative boundary between prison work and forced labor, and they anticipate almost exactly the practices that our contemporary cases exhibit: private hire of prisoners, labor as punishment for political dissent, and labor as a tool of ethnic discrimination. The Council of Europe's European Prison Rules (Council of Europe 2006) added that prison work should approximate work in the community in its conditions and remuneration, and that it should never be imposed as a punishment. Jarman and Heard (2023) have shown how unevenly these standards are honored, and how the exemption for state-supervised labor has been stretched to cover arrangements the drafters would not have recognized. The ILO Committee of Experts has itself contributed to this stretching. It has accepted that work for private entities can be compatible with Convention No. 29 where the prisoner gives formal, free, and informed consent and the conditions approximate a free labor relationship (International Labour Organization 2007), a reading that converts an absolute prohibition into a conditional one.

The late 20th century added a third chapter that bears directly on the direction of travel. The prison-industrial complex, as it came to be called in the United States, united rising incarceration, the privatization of prison services, and the expansion of prison industries into a political economy with its own constituencies (Gilmore 2007; H. A. Thompson 2012). Reich (2024) has traced the shift in the rationale for American prison work from hard labor to market discipline between 1974 and 2022, showing how the language of job readiness replaced the language of punishment while wages fell and protections remained absent. At the same time, the Nordic countries and Germany built penal systems in which work, although compulsory in several German Länder and framed in Norway as an activity obligation, was remunerated and tied to reintegration (Pratt 2008; Pruin 2018; Ugelvik 2016), although Barker (2013) and Shammas (2017) have cautioned against treating Nordic exceptionalism as unqualified. The divergence between these trajectories within the democratic world is itself the strongest indication that regime type does not determine the direction of innovation in prison labor governance.

A well-developed literature explains this divergence through comparative political economy. Lacey (2008) links the penal moderation of coordinated market economies and the penal severity of liberal market economies to their institutions of production and representation, Cavadino and Dignan (2006) offer a typology of neoliberal, conservative corporatist, and social democratic penal systems that makes a similar point, and Barker (2009) shows how different forms of democratic participation shape punishment across American states. These accounts explain why democracies diverge. The practice perspective adds an account of how the divergence is produced and reversed, through identifiable redesigns and the mechanisms we specify below, and it allows the same analysis to be extended to authoritarian regimes, to which varieties of capitalism arguments travel poorly. The two approaches are complementary: Political economy identifies the conditions under which commercialization, legal exception, and crisis framing find purchase, and the practice perspective identifies the redesigns through which they operate.

4 | A Comparative Exploration

We now turn to the four cells of the matrix. The cases we discuss are illustrative, chosen because they have been documented in scholarship, official reporting, or investigative journalism, and because together they span the range of regimes and practices. We do not claim that each country belongs permanently in one cell; the point of the matrix is to make movement visible. Placement on the regime axis uses the Regimes of the World classification produced by the V-Dem project (Lührmann et al. 2018; V-Dem Institute 2025), which distinguishes liberal and electoral democracies from electoral and closed autocracies. We treat the axis as a continuum, state the coding of each country, and flag competitive authoritarian cases in Levitsky and Way's (2010) sense. Placement on the innovation axis follows the two markers of authoritarian practice, secrecy and the disabling of voice, together with the extraction of labor under conditions the prisoner cannot contest; where a system displays rehabilitative programs for some prisoners and coercive labor for others, we record the segmentation as a finding in its own right. Table 1 summarizes the four cells, the rationale that governs each, the practices through which it is enacted, and the countries we discuss under it, and a note to the table records each country's ratification of Conventions No. 29 and No. 105 and its observed direction of movement.

Two further choices govern the exploration. The first concerns the unit of analysis. The units placed in the matrix are programs and populations within national prison systems, and countries serve as containers for them. This is why China, Iran, and Russia appear in more than one cell, and why Norway, the United States, and India, where the populations to whom rehabilitation is extended are bounded by citizenship, race, and caste, display segmentation within democratic systems. The second concerns method and case selection. Our approach is typological theorizing in the sense of George and Bennett (2005), with cases serving as plausibility probes for the matrix and the mechanisms. We selected cases on three criteria: that each cell be represented by at least two systems; that the cases vary in region, legal tradition, and level of economic development; and that each case have documentation, in scholarship, official reporting, court judgments, or sustained investigative and human rights reporting, sufficient to identify the governing rationale and the characteristic practices of prison labor. Several plausible cases were set aside on the last criterion, among them a number of Gulf and Central Asian systems for which reliable information on prison labor is scarce, and others, such as Australia and France, were set aside because they would have duplicated configurations already represented. The selection therefore reflects the visibility of cases as well as their analytical value, a point we return to in the limitations. Table S1 summarizes, for each case, the types of source on which we rely and our assessment of their reliability.

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jobs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

TABLE 1 | Regime type and innovation type in prison labor governance.

Cell	Regime type	Innovation type	Governing rationale	Characteristic practices	Illustrative countries
I	Democratic	Democratic	Work as reintegration; the prisoner remains a member of the governed population to whom accountability is owed.	Remunerated work framed as an activity obligation or tied to reintegration; wages approximating free labor; vocational training and education; prisoner voice through councils, union organizing, and judicial correction; public reporting.	Norway, Germany (with debt-trap and citizenship residues); United Kingdom (borderline, moving toward Cell II through privatization); Japan (borderline; compulsory labor under a rehabilitative rationale until the 2025 custodial sentence reform)
II	Democratic	Authoritarian	Work as revenue, subsidy, or emergency resource; the convicted person is exempted from the protections of the demos.	Compulsory work enforced by punishment; wages at cents per hour or none; exclusion from labor law; private hire; crisis deployment; legal exception written into constitutions or administrative practice; little public information.	United States; Brazil; India (electoral autocracy in V-Dem coding; caste assignment of labor until 2024); Turkey (at the boundary of the regime axis; electoral autocracy in V-Dem coding; state-run prison industry expanding with a politically produced prison population)
III	Authoritarian	Authoritarian	Work as punishment, political coercion, ethnic control, or state project; no pretense of rehabilitation for the targeted population.	Forced labor of political prisoners and ethnic minorities; labor transfer programs; prisoner recruitment for war; camp systems under state secrecy; direct contravention of ILO Convention No. 105.	China (Xinjiang and ordinary penal system); Russia (Wagner recruitment); Iran (political prisoners); North Korea; Eritrea
IV	Authoritarian	Rehabilitation without voice (segmented)	Rehabilitation for ordinary offenders as legitimation; the line between the populations is drawn by the political character of the offense.	Education, psychological support, and vocational training available to non-political prisoners; the same programs closed to dissidents; rehabilitative discourse cited in response to international criticism; claimed compliance with ILO convention no. 29.	Iran (rehabilitation for ordinary offenders); China (reform-through-labor and vocational-training discourse); Russia (correctional education for ordinary prisoners)

Note: Regime coding follows V-Dem's Regimes of the World (V-Dem Institute 2025), and the regime axis is read as a continuum. Ratification of ILO Conventions No. 29 and No. 105: Norway, Germany, the United Kingdom, Brazil, India, Turkey, Russia, Iran, and Eritrea have ratified both; Japan ratified No. 29 in 1932 and No. 105 in 2022; the United States has ratified No. 105 only; China ratified both in 2022; North Korea is not a member of the ILO. Observed direction of movement: Germany, Japan, and India toward Cell I through judicial or legislative reform; the United Kingdom toward Cell II through privatization; the United States within Cell II, with reform contested state by state; Turkey from Cell II toward Cell III; China and Russia intensifying within Cell III while maintaining Cell IV programs; Norway stable in Cell I with a citizenship boundary.

4.1 | Democratic Innovation Under Democratic Rule

Norway and Germany are the cases most often cited as rehabilitative models, and the description is largely deserved. Norwegian prison policy rests on the principle of normality, according to which life inside should resemble life outside as closely as security permits, and work is organized as part of a program of reintegration that also includes education and counseling (Ugelvik 2016). Bastøy, the island prison that has become emblematic of this approach, employs prisoners in farming, forestry, and maintenance within a regime that treats them as residents of a community they are preparing to rejoin. German prison labor is framed by a constitutional commitment to resocialization, and work is structured to approximate ordinary employment, with vocational training and a wage, although the wage remains a fraction of the free-market rate (Pruin 2018). Pieper (2022) has documented how low prison wages combined with the costs charged to prisoners have produced debt traps that undermine reintegration, which indicates that even systems oriented toward democratic innovation

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jpbs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

contain extractive residues. The German case also shows democratic innovation through judicial correction. In its judgment of 20 June 2023, the Federal Constitutional Court found the remuneration of prison work in Bavaria and North Rhine-Westphalia unconstitutional because it fell short of the resocialization mandate (Bundesverfassungsgericht 2023), an intervention that parallels the Indian Supreme Court ruling discussed below. Voice has also been claimed from below: The prisoners' union GG/BO, founded in Berlin's Tegel prison in 2014, has campaigned for the minimum wage and pension contributions for working prisoners. The Nordic case carries a further qualification. Pratt (2008) attributed Scandinavian exceptionalism to the egalitarian culture and welfare institutions of the region, and Shammas (2017) showed how Norwegian prison labor was transformed over the 20th century from a disciplinary instrument into an extension of social democratic labor policy. Barker (2013) nonetheless found a Janus face: the same welfare state that treats its own citizens' prisoners with dignity has been considerably less generous to foreign nationals, who are overrepresented in the harsher parts of the system and are the first to be deported. The boundary of the governed population to whom accountability is owed is drawn by citizenship in Norway, as it is drawn by race in the United States and by political offense in Iran, and democratic innovation stops at that boundary.

The United Kingdom is sometimes grouped with these cases, and it does contain democratic innovations, among them a scheme that allows prisoners to pursue doctoral research under academic supervision (Reisz 2023), and prisoner councils, consultative forums that operated in nearly a third of prisons in England and Wales by the early 2000s (Solomon and Edgar 2004). Yet, the British system also contracts prison work to private firms, and Pandeli et al. (2019) found in a privatized prison that commercial contracts were the institution's main earner while a corporate partner acknowledged that cost, and not rehabilitation, was its motive. Pandeli and Longman (2025) argue that such arrangements reproduce carceral capitalism by teaching prisoners to value the system that confines them. Convicted prisoners in England and Wales are required by the Prison Rules to do useful work, and the United Kingdom draws the boundary of the demos at the prison gate in the most literal sense, through a blanket ban on prisoner voting that the European Court of Human Rights found incompatible with the Convention in Hirst v and the United Kingdom (No. 2) (2005). The United Kingdom, in short, sits on the border between this cell and the next, and the direction of its movement follows the fortunes of privatization.

Japan presents a different configuration. Until 2025, work was compulsory for most sentenced prisoners, discipline was strict, and the regime was justified through a rehabilitative discourse that emphasizes the acquisition of work habits and reintegration into a society that places a high value on social harmony (Someda 2022). The system records low rates of reoffending, and its defenders attribute this to the work-oriented structure. Whether compulsory labor under strict discipline can be described as democratic innovation is doubtful by our definition, since the prisoner's voice in the arrangement is minimal; what Japan shows is that a democratic regime can sustain a coercive labor regime under a rehabilitative rationale without the commercialization that marks the next cell. It is a reminder that the two axes of the matrix are independent, and that the absence of profit does not by itself make a prison labor regime democratic in practice. Japan's position is also moving. A revision of the Penal Code that took effect in June 2025 merged imprisonment with and without work into a single custodial sentence (kōkinkei), under which work is assigned as one element of an individualized rehabilitation program and is no longer the default content of the sentence, and Japan ratified Convention No. 105 in 2022. Both are movements on the matrix toward the first cell. Neither yet extends voice to prisoners, and we place Japan on the border of the first cell with that reservation.

4.2 | Authoritarian Innovation Under Democratic Rule

The United States is the paradigmatic case of authoritarian innovation under democratic rule, and its history, sketched above, shows that this is no recent development. What is recent is the scale and the rationale. With an incarceration rate above 500 per 100,000 and more than 1.7 million people behind bars, the country holds a captive workforce of a size no other democracy approaches (World Prison Brief 2025). The ACLU's investigation of that workforce found that most incarcerated workers are required to work, that they are paid cents per hour or nothing at all, that they are excluded from minimum wage, overtime, and health and safety protections, and that they can be punished with solitary confinement or loss of family visits for refusing (Turner et al. 2022). The United States has ratified Convention No. 105 but never Convention No. 29, which leaves its private hire of prisoners outside the obligations of the latter. Mason and McDowell (2022) documented serious injuries and deaths among prisoners assigned to dangerous agricultural and industrial jobs, with little recourse for them or their families. Hatton (2020) has shown that the threat of punishment, and not the wage, is the mechanism of coercion, which places prison work alongside other forms of coerced labor in the American economy. Federal Prison Industries, trading as UNICOR, exemplifies the tension: it offers training and generates revenue for the federal system while paying wages that would be illegal anywhere else (Reich 2024). The use of prisoners as wildland firefighters in California, who can make up nearly a third of those fighting the state's fires and are paid a few dollars a day for work that kills free firefighters at a steady rate, shows the crisis framing through which this labor is normalized (Melville 2025). Goodman (2012) has shown how the fire camps combine a rehabilitative rationale with the extraction of dangerous labor, and California's Assembly Bill 2147 of 2020, which allows former incarcerated firefighters to petition for the expungement of their records, shows that movement within this cell runs in both directions. Each of these arrangements disables the voice of the governed population, withholds the protections that make voice effective, and extracts labor under conditions the population cannot contest. Each is therefore an authoritarian innovation in the practice sense. The population subjected to these arrangements is also not a random sample of the citizenry. Alexander (2010) has shown how the war on drugs rebuilt a racial caste system through the criminal law, and Davis (2003) and Childs (2015) have traced the line that runs from the plantation through the chain gang to the contemporary

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jobs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

penitentiary. The exception clause that authorizes prison labor was written in the same sentence that abolished slavery, and the population it governs remains disproportionately Black. Authoritarian innovation under democratic rule in the United States is therefore inseparable from racialized capitalism: the innovation disables the voice of a population whose voice had already been discounted, and it extracts labor from bodies whose labor had already been expropriated. Jarman and Fair (2024) show how the legal architecture that permits these arrangements has been assembled from the exception clause, from the exclusion of prisoners from the definition of employee, and from state constitutions that replicate the federal exception. Reform efforts exist and matter: ballot measures to remove the exception from state constitutions have succeeded in several states and failed in others, including California, where Proposition 6 was rejected in 2024 (Schultheis 2024), and Louisiana, where the debate over whether prison labor constitutes slavery remains unresolved (McGoogan 2023). The persistence of the exception through these contests is itself a measure of how deeply the innovation is embedded.

Brazil and India show that authoritarian innovation under democratic rule is not an American peculiarity. In Brazil, prison work programs framed as rehabilitation have been found to extend unpaid labor beyond the limits the law permits (Teixeira 2020). Brazil's Lei de Execução Penal (Law No. 7210 of 1984) ties work to the remission of sentence, 1 day for every 3 days worked, and remission has since been extended to study and reading, so that a single system combines compulsion with incentives that prisoners can use to shorten their sentences. Jarman and Heard (2024) have compared the gap between law and practice in Brazil, the United Kingdom, and the United States to show how similar the mechanisms are across quite different legal traditions. In India, prison labor has long been assigned by caste, with prisoners from lower castes allocated cleaning and other stigmatized tasks under rules inherited from colonial prison manuals, a practice the Supreme Court struck down in 2024 (Sukanya Shantha v Union of India 2024; Silk 2024). Gupta and Gupta (2018) show that Indian prison work programs can support family income and reintegration, which is exactly the point: the same program can carry democratic and authoritarian practices at once, and the caste assignment of labor was an authoritarian practice embedded in a rehabilitative frame. The court's intervention is a democratic innovation in response. India's own placement on the regime axis is contestable, as V-Dem has classified it as an electoral autocracy in its annual reports since 2021 (V-Dem Institute 2025), and we place it toward the authoritarian end of the democratic side.

Turkey is a case that tests the regime axis of the matrix. It is a competitive authoritarian regime by most contemporary assessments, holding regular elections on a tilted field (Esen and Gumuscu 2016), and an electoral autocracy in V-Dem's classification (V-Dem Institute 2025). We place it at the boundary of the regime axis, as a case whose prison labor governance has moved decisively toward authoritarian innovation under the cover of democratic form. Its prison population has risen sharply over the past decade, to a rate above 400 per 100,000 that ranks among the highest in the Council of Europe (World Prison Brief 2025), a growth driven above all by the prosecutions that followed the 2016 coup attempt and the decree-law period of the state of emergency, alongside the prosecution of participants in social and political movements since 2013 and a wide application of anti-terror legislation; the Minister of Justice reported in 2024 that nearly 66,000 prisoners were enrolled in education programs, a figure that includes literacy and open education courses (Başer 2024). Prison labor has expanded in step. Over 50,000 prisoners work in some 180 lines of production under the Ministry of Justice's workshops institution, producing for the domestic market and for export (CNN Türk 2018), and prisoners have been used to build new prisons to hold the growing population (Şahin 2019). The legal basis of this regime lies in Law No. 5275 of 2004 on the execution of sentences and Law No. 4301 of 1997 on the workshops institution. Pektaş (2011) placed this expansion within the wider pattern of an unregulated neoliberal context in which capital has turned to prisoner labor as to any other cheap labor pool, and Daniş (2026) has traced the longer cultural transformation since 1980 through which neoliberal governmentality reshaped the relation between state, market, and citizen in Turkey. The combination is distinctive. A prison population enlarged in significant part by political prosecutions and an expanding state-run prison industry have grown together, although the direct link between political imprisonment and workshop labor is difficult to establish, because people convicted of terrorism offenses face restricted access to the open institutions in which much prison work takes place; and the rehabilitative language of the workshops institution coexists with a labor regime over which prisoners have no voice and about which there is little public information. Turkey also offers a clear instance of segmentation. Law No. 7242 of April 2020 released large numbers of prisoners during the pandemic while excluding most of those convicted of terrorism offenses, drawing the boundary of the population to whom relief was owed along the line of political offense. By the markers of secrecy and disabled voice, this is authoritarian innovation, and its position at the boundary of the regime axis shows why that axis is better read as a continuum.

4.3 | Authoritarian Innovation Under Authoritarian Rule

The clearest contemporary cases are those in which prison labor is used as an instrument of political and ethnic control, in direct contravention of Convention No. 105. In China, the system of reform through labor analyzed by Shaw (1998) has been supplemented by a program of mass detention in Xinjiang and the transfer of Uyghur detainees to factories across the country. Xu et al. (2020) documented the transfer of more than 80,000 Uyghurs between 2017 and 2019 to factories in the supply chains of global brands, under conditions of surveillance, restricted movement, and suppressed religious practice; Zenz (2019) showed how these transfers are embedded in a long-term scheme that fuses coercive labor with poverty alleviation and social control. Humphrey (2022) has described prison labor in China's ordinary penal system as forced labor hiding in plain sight, feeding export manufacturing. These are authoritarian innovations in the fullest sense: new institutional forms, including the vocational training center and the labor transfer program, designed to extract labor and compliance from a population whose voice has been eliminated.

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jobs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

Russia's recruitment of prisoners to fight in Ukraine extends prison labor beyond the economic into the geopolitical. Kurmanaev et al. (2023) traced the fate of prisoners who accepted the Wagner Group's offer of a pardon in exchange for 6 months at the front; United Nations experts expressed alarm at the recruitment and at the conditions under which consent was obtained (Office of the United Nations High Commissioner for Human Rights 2023). The arrangement revives and adapts a Soviet template: During the Second World War, large numbers of Gulag prisoners were released to the Red Army and penal battalions were formed from convicts (Applebaum 2003). The innovation lies in the renewal of that template through a private military company, its subsequent transfer to Ministry of Defense units, and legislation in 2024 that extended contract options to people under investigation or on trial (Meduza 2024). It is authoritarian in that the choice presented to prisoners in a penal colony is not one they can contest or refuse on equal terms. Its lineage runs back to the Gulag's conversion of punishment into a labor reserve for state projects (Applebaum 2003), and its contemporary form shows how an authoritarian regime adapts that template to a war economy.

Iran's prison system is less documented, a known unknown in Anaraki's (2020) phrase, but the pattern that emerges from human rights reporting is consistent, and it sits within a cycle of authoritarian resurgence that Babaei (2026) has traced back to the constitutional period of 1906–1925, in which each opening has been followed by a reconsolidation of coercive rule. The incarceration rate stands at roughly 228 per 100,000, and the prison population includes large numbers of activists, journalists, students, and human rights defenders detained in the waves of arrest that followed the protests of 2022 (Human Rights Watch 2024; World Prison Brief 2025). Human Rights Activists in Iran (2024) recorded more than 1300 instances of forced labor in 2023, frequently in state enterprises and under exploitative conditions, and political prisoners are disproportionately represented among those subjected to it. North Korea and Eritrea complete this cell. Both run prison camp systems shrouded in secrecy, in which labor serves as punishment, as a means of control, and as an economic resource, with no pretense of rehabilitation (United Nations Human Rights Council 2014, 2015; United Nations Human Rights Council 2016). These are the cases in which regime type and innovation type coincide. They are also the limit case for our criteria: lacking any legitimating claim, the North Korean and Eritrean camp systems are authoritarian practices of the oldest kind, against which the innovations elsewhere in this cell, the labor transfer program and the prisoner–soldier contract, can be measured. The concept of authoritarian innovation was abstracted from regimes in Southeast Asia that built popular support (Curato and Fossati 2020), and the matrix shows that the coercive cases intuitively associated with authoritarian rule occupy one cell among four.

4.4 | Segmented Rehabilitation Under Authoritarian Rule

The fourth cell is the least intuitive and the most revealing. Authoritarian regimes do adopt rehabilitative programs, and they do so for reasons that Curato and Fossati (2020) would recognize: Such programs respond to real needs, generate support among the families of ordinary prisoners, and signal to international audiences a commitment to humane treatment. We describe these programs as rehabilitation and not as democratic innovation, because none of them extends voice to prisoners; the Xinjiang discourse of vocational training in particular is a claim made by the regime, which we analyze as legitimation and do not accept as description. In Iran, educational initiatives and psychological support exist within the prison system and are accessible to those convicted of ordinary crimes (Mollaie et al. 2018), and Iranian legal scholars have called for a humanitarian approach to prison employment grounded in prisoners' fundamental rights (Khajehnoori and Jamshidi 2023). The same programs are largely closed to political prisoners, who face instead the forced labor, torture, and flogging documented above. In China, the ideological rationale of reform through labor has always included a claim to transform the prisoner, and vocational training is the official description of the Xinjiang detention system itself (Shaw 1998; Zenz 2019). China's ratification of Conventions No. 29 and No. 105 in 2022 can be read in the same light, as a legitimating gesture toward international audiences made while the labor transfer programs documented above continued. Russia's penal system likewise maintains vocational education and a discourse of correction for ordinary prisoners alongside the arrangements described in the previous section.

We call this segmented rehabilitation. The rehabilitative program is real for one population and absent for another, and the line between them is drawn by the political character of the offense. Its function is legitimation: The rehabilitative segment supplies the regime with a story about its prisons that is true for ordinary offenders and false for dissidents, and it allows the regime to cite its own programs in response to international criticism. Zadora (2026) has shown in the Belarusian case how an authoritarian regime converts the Soviet legacy of state-managed social mobility into engineered dependence, a durable resource through which compliance is purchased with selective provision; segmented rehabilitation in prison labor governance works on the same principle, at the point where dependence is total. The segmentation also discloses the logic that governs the other three cells. In every case, the question is who counts as a member of the governed population to whom accountability is owed. Convict leasing answered that question by race, Xinjiang answers it by ethnicity and religion, Iran answers it by political offense, and the American exception clause answers it by conviction itself. Segmented rehabilitation shows that the answer can be given selectively within a single system, which is the mechanism through which authoritarian regimes borrow the forms of democratic innovation without its substance. Segmentation is not confined to this cell. Norway draws the line by citizenship, the United States by race and conviction, India by caste until 2024, and Turkey by political offense in its pandemic release law, which makes segmentation the mechanism that runs through the whole matrix.

5 | How Authoritarian Innovation Travels

The comparative exploration points to three mechanisms through which authoritarian innovation enters prison labor governance in democratic regimes, and one through which

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jobs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

authoritarian regimes borrow democratic forms. Each mechanism is also a direction of movement on the matrix.

A distinction is needed between travel and drift. The three mechanisms describe how authoritarian practices arise or intensify within a system, which is drift. Travel in the stricter sense requires transfer between systems, and the policy transfer literature specifies how it happens (Dolowitz and Marsh 2000; Jones and Newburn 2007). The prison field offers documented instances. Private prison contracting was exported from the United States to the United Kingdom and Australia in the early 1990s through firms, consultants, and policy networks; the Wagner recruitment model was transferred from a private military company to the Russian state; and international standards, as we discuss below, have served as a channel through which rehabilitative forms reach authoritarian systems. Our evidence supports drift more strongly than diffusion for most cases, and we use travel to cover both, specifying transfer where it is documented.

The first mechanism is commercialization. When incarceration becomes a source of revenue, whether for the state through prison industries, for private contractors through service and labor contracts, or for firms through the purchase of prison-made goods and prison-based services, the rationale for prison labor shifts from the prisoner to the balance sheet, and the practices that follow are authoritarian by our definition because they treat the prisoner's voice as a cost. H. A. Thompson (2012) and Gilmore (2007) traced this logic in the United States, Pandeli et al. (2019) in the United Kingdom, and Cate (2022) showed in Mississippi how austerity-driven reform can worsen conditions by stripping out the staffing and support that rehabilitation requires. Richey (2024) added a further turn: the ethical imaginaries through which prison labor is marketed to consumers, as second chances and sisterhood, make capitalism feel right and conceal the coercion beneath. Commercialization in the form of state commodification also helps explain the Turkish trajectory, in which a state-run prison industry has grown with the prison population, and it is the channel through which democratic systems move from the first cell to the second. We use commercialization for the conversion of prison labor into revenue, which includes the state commodification of prison work through institutions such as Turkey's workshops institution. Financialization in the narrower sense of political economy, the growing role of financial actors, motives, and instruments, is present in some systems and intensifies the same logic: private equity ownership of prison telecommunications and commissary firms in the United States, the conversion of CoreCivic and GEO Group into real estate investment trusts in 2013 (Corrections Corporation of America 2013; Prison Legal News 2013), lease-revenue bonds for prison construction, the Peterborough social impact bond launched in the United Kingdom in 2010 (Disley et al. 2011), and the pay-to-stay and fee regimes that produce the German debt traps noted above.

The second mechanism is legal exception. Prison labor exists in every system within a zone where ordinary labor rights do not apply, and authoritarian innovation consists in widening that zone. The 13th Amendment's exception clause is the archetype, but the exclusion of prisoners from the definition of employee, the stretching of the ILO's state-supervision exemption to cover private contracts, and the classification of political detention as administrative instead of penal all perform the same function (Jarman and Heard 2023; Zatz 2008). Crosson (2023) has described a parallel technique in immigration policing, where the gaps and loopholes in the asylum system are not failures of governance but its instruments, producing a population that can be held, moved, and worked without the protections that formal status would carry. The exception is what allows a democratic regime to run a labor regime it would not tolerate outside the prison, and it is also what allows the regime to deny that any contradiction exists. Where the exception is written into constitutional law, as in the United States, it survives repeated attempts at repeal; in Turkey, where Article 18 of the Constitution likewise excludes work required of convicts from the definition of forced labor, the exception operates largely through the administrative practice of the workshops institution, which makes it less visible and therefore less contested.

The third mechanism is crisis framing. Wildfires, pandemics, labor shortages, and wars have each been invoked to justify the deployment of prisoners as an emergency workforce, and the emergency suspends the question of consent. California's incarcerated firefighters and Russia's prisoner-soldiers are the clearest cases, and they belong to different cells of the matrix, which shows that crisis framing is a mechanism available to regimes of every type. Democracies have a long record of labor conscription under emergency, and the record shows how readily the emergency erases consent. S. Thompson (2022) traced the experience of the Bevin Boys, young men conscripted by ballot into British coal mines between 1943 and 1948, whose identities as workers were imposed by the state and who were released only years after the war had ended. The historical record suggests that emergency deployments tend to become permanent: the California fire camps took their present form in the 1940s (Goodman 2012), and Federal Prison Industries, established in 1934 (James 2013) and now trading as UNICOR, has long outlived the Depression-era conditions in which it arose. Crisis framing matters for the theory of authoritarian innovation because it shows how an innovation can be introduced with popular support, which is the phenomenon Curato and Fossati (2020) set out to explain, in a democracy as readily as in a dictatorship.

Secrecy runs through all three mechanisms and deserves separate mention, because it is the second of Glasius's (2018) markers of authoritarian practice and because it is the condition under which all three operate unchallenged. Information about prison labor is scarce in every system we have discussed. In the United States, the ACLU had to compile its account of incarcerated workers from freedom-of-information requests and from the testimony of prisoners, because no federal agency publishes comprehensive data on prison labor across state and federal systems, and the Bureau of Justice Statistics and Federal Prison Industries report only partial figures (Turner et al. 2022). In Turkey, the workshops institution reports production figures but not wages, hours, or the terms on which prisoners are assigned to work. In Iran, the prison system is a known unknown even to Iranian researchers (Anaraki 2020), and in China, Eritrea, and North Korea the labor camp is a state secret. The variation is one of degree. In each case the governed population cannot be heard and the public cannot see, and the two

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jobs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

conditions reinforce each other: where there is no information, there is no scandal, and where there is no scandal, there is no pressure to extend voice. Democratic innovation in prison labor governance therefore begins with disclosure, which is why the investigative reporting and human rights documentation on which this article draws are themselves part of the process it describes.

The reverse mechanism, segmentation, operates in the opposite direction. Authoritarian regimes borrow the forms of democratic innovation through segmentation, as the previous section argued, and the borrowing is enabled by the same international standards that are meant to constrain them. Convention No. 29 permits prison labor under public supervision, and a regime that can show rehabilitative programs for ordinary prisoners can claim compliance while running forced labor for dissidents in a parallel system. Hui (2022) has shown in the Chinese case how an authoritarian regime can tolerate movement-oriented labor organizations in some sectors while suppressing them in others, a segmentation of voice that has a direct analogue in the segmentation of rehabilitation. The point for the theory is that democratic and authoritarian innovation are not opposites along a single dimension. They can be combined within one institution, and the combination is itself an innovation.

6 | Discussion and Conclusion

Our exploration began from a puzzle about the incarcerated firefighters of Los Angeles and ends with a reformulation of the concept that the puzzle put in question. Authoritarian innovation, we have argued, is a governance practice and not a regime property. It consists in the deliberate redesign of institutions in ways that sabotage accountability to a governed population, and it can be observed in democracies and dictatorships alike. Prison labor has served as the case through which this argument was developed because it is the domain in which liberal states come closest to the condition of total control that authoritarian regimes exercise over their whole populations, and because its governance has oscillated for two centuries between extraction and reform. The matrix that crosses regime type with innovation type makes that oscillation visible as movement between four positions, and the three mechanisms we have specified, commercialization, legal exception, and crisis framing, explain how democratic systems move toward coercion, whereas segmentation explains how authoritarian systems borrow the forms of reform.

The contribution to the theory of authoritarian innovation is to decouple it from regime type while preserving what made the concept useful in the first place: its attention to the creative and legitimating character of practices that reduce accountability. The studies that found authoritarian innovation in the United States, the United Kingdom, and India (Noronha and D'Cruz 2024; Rhomberg 2024; Smismans 2024) had already implied this decoupling; the prison labor case shows why it is necessary and what follows from it. Once the practice is separated from the regime, it becomes possible to ask about direction and mechanism, which are the questions a historical sociology of institutions is equipped to answer. It also becomes possible to see that the counterpart of authoritarian innovation is democratic innovation as a practice, with democracy as a regime type offering no guarantee of either, and that the two practices can be combined within a single institution. The segmented rehabilitation of authoritarian prison systems shows how the form of one practice can be carried by the substance of the other, and it suggests that scholars should look for similar segmentation in the labor governance of democracies, where the protections extended to citizens are routinely withheld from migrants, from informal workers, and from prisoners. Segmentation is in this sense the article's central finding. It is a cross-cutting mechanism found in democracies as well as autocracies, and together with the prison labor case, the matrix, and the three mechanisms of travel, it is where the article adds to work that had already separated authoritarian practice from regime type.

The contribution to the sociology of punishment is to reframe the long debate over whether prison labor rehabilitates or exploits. Both sides of that debate have been right about different cases and different periods, because the balance between the two rationales is the outcome of a struggle whose direction changes. The historical record from convict leasing to the prison-industrial complex shows a recurrent pattern in democracies in which the rehabilitative rationale is retained as language while the extractive rationale governs practice (Reich 2024), and the contemporary cases show that pattern intensifying under the pressure of commercialization and the opportunities of crisis. The Nordic and German exceptions demonstrate that the pattern is not inevitable, and their internal contradictions, from debt traps to the Janus face of Nordic penality (Barker 2013; Pieper 2022), demonstrate that no system is immune. In the sociology of punishment's own terms, the matrix updates Rusche and Kirchheimer's (1939) thesis for a period in which the labor market that governs punishment is global, commercialized, and increasingly insulated from democratic contestation.

Prisoners are also agents in this struggle and not only objects of redesign. The direction of travel is contested from below as well as above: the national prison strikes in the United States in 2016 and 2018, organized in part by the Incarcerated Workers Organizing Committee, the German prisoners' union GG/BO, prisoner councils in England, litigation over prisoner pay and prisoner voting, and the ballot campaigns to remove exception clauses from state constitutions all show prisoners and their allies pressing for voice. The matrix therefore captures struggle as well as design. In the cases we discuss, movement from the second cell toward the first has followed disclosure and organized contestation more often than administrative initiative.

The regime axis of the matrix deserves one further comment. We have treated it as a continuum, and the cases show why: several of the countries discussed are moving along it. Turkey has traveled from the democratic toward the competitive authoritarian end over the period in which its prison industry expanded, and the two movements have run in parallel: the prison population on which the workshops institution draws was enlarged in significant part by the prosecution of dissent, although, as noted above, the direct link between political imprisonment and workshop labor is difficult to establish. Whatever the movement of the United States as a regime, its prisons have traveled further toward coercion than its formal institutions. This is precisely what the practice perspective

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jobs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

predicts. Authoritarian innovation can advance inside an institution while the regime that houses it remains democratic by every formal test, and the institution in which it advances furthest will be the one whose governed population has least voice to begin with.

Two developments are likely to shape the direction of travel in the coming years. The first is the continued expansion of commercial interest in incarceration, which has found new outlets in the contracting of prison services, the marketing of prison-made goods, and the use of prisoners in sectors, from agriculture to emergency response, where free labor is scarce or expensive. The second is the rise of political movements in several democracies that treat the expansion of incarceration and the suppression of protest as electoral assets, and that are therefore unlikely to view the prison as a place where accountability should be extended. Where these two developments coincide, the movement from the first cell of the matrix to the second will accelerate, and the democratic character of the regime will offer little protection to the governed population inside its prisons.

The policy implications follow from the mechanisms. If commercialization is the channel through which authoritarian innovation enters democratic prison systems, then limiting the commercial interest in prison labor is the most direct safeguard: Restricting private hire to arrangements that meet the Committee of Experts' tests of free and informed consent and conditions approximating free employment, and enforcing those tests in practice, paying wages that approximate those outside, and removing the budgetary incentive for prison industries to expand. If legal exception is the channel, then the exceptions themselves are the target, beginning with the constitutional clauses that exempt convicted persons from the prohibition of slavery and extending to the definitions of employee and worker that exclude prisoners from labor law. If crisis framing is the channel, then emergency deployments of prisoners should be subject to the same consent, remuneration, and safety standards as the deployment of free workers, and should lapse with the emergency. For authoritarian regimes, the implication is that international monitoring should attend to segmentation, asking who is excluded from the rehabilitative programs a regime cites in its defense, and should treat the exclusion of political prisoners from those programs as the violation of Convention No. 105 that it is.

The limitations of the exploration are those of its method. The cases are illustrative, documented unevenly, and drawn from secondary sources whose reliability varies with the openness of the regime they describe; the Iranian, Eritrean, and North Korean cases in particular rest on human rights reporting that cannot be independently verified. Our reliance on secondary sources, journalism, and NGO reporting also introduces a risk of reporting and selection bias. Cases with high media visibility and dense NGO coverage, such as the United States, China, and Russia, are more fully documented than others, and that visibility may have drawn our attention toward them; conversely, the systems about which least is known may be among those in which authoritarian innovation is most advanced, since secrecy is one of its markers. Table S1 records the source base of each case so that readers can weigh it. The matrix is a heuristic for making movement visible, and the placement of any country within it is a judgment that reasonable observers may contest, as our treatment of Turkey and Japan acknowledges. Future research could pursue three lines. Comparative historical studies of single systems over long periods could trace the movement between cells and test the mechanisms we have proposed. Studies of the segmentation of rehabilitative programs within authoritarian systems could specify how the line between ordinary and political prisoners is drawn and policed. And research on the role of international organizations, above all the ILO, could ask how the standards that define forced labor have been interpreted in ways that permit the practices they were written to prohibit, and whether a practice-based understanding of authoritarian innovation offers a firmer footing for their enforcement. A fourth line concerns cases beyond those discussed here. El Salvador, where mass incarceration under a prolonged state of exception has generated strong popular support and prisoners are put to public works, may be the clearest contemporary instance in the penal field of the phenomenon Curato and Fossati (2020) set out to explain, and the transfer of deportees from the United States to its CECOT prison in 2025 connects it to the transnational authoritarian practices described by Glasius (2023).

Funding

The authors have nothing to report.

Ethics Statement

Ethical approval was not required for this study, as it does not involve human participants, patient data, or animal subjects.

Conflicts of Interest

The authors declare no conflicts of interest.

Permission to Reproduce Material From Other Sources

All material reproduced from other sources has been appropriately cited and does not require further permission.

Data Availability Statement

Data sharing not applicable to this article as no datasets were generated or analysed during the current study.

References

Alexander, M. 2010. *The New Jim Crow: Mass Incarceration in the Age of Colorblindness*. New Press.

Anaraki, N. R. 2020. *Prison in Iran: A Known Unknown*. Palgrave Macmillan.

Applebaum, A. 2003. *Gulag: A History*. Doubleday.

Asenbaum, H. 2022. "Rethinking Democratic Innovations: A Look Through the Kaleidoscope of Democratic Theory." *Political Studies Review* 20, no. 4: 680–690. https://doi.org/10.1177/14789299211052890.

Babaei, H. 2026. "Sociological Analysis of the Cycle of Authoritarian Resurgence in Iran During the Constitutional Period 1906–1925." *Sociology Lens* 39, no. 3: 399–413. https://doi.org/10.1111/johs.70059.

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/johs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

Barker, V. 2009. *The Politics of Imprisonment: How the Democratic Process Shapes the Way America Punishes Offenders*. Oxford University Press.

Barker, V. 2013. "Nordic Exceptionalism Revisited: Explaining the Paradox of a Janus-Faced Penal Regime." *Theoretical Criminology* 17, no. 1: 5–25. https://doi.org/10.1177/1362480612468935.

Başer, H. F. 2024. "Adalet Bakanı Tunç: Ceza İnfaz Kurumlarımızda 65 bin 969 hükümlü ve tutuklu eğitim görüyor." *Anadolu Ajansı*. https://www.aa.com.tr/tr/gundem/adalet-bakani-tunc-ceza-infaz-kurumlarimizda-65-bin-969-hukumlu-ve-tutuklu-egitim-goruyor/3274481.

Blackmon, D. A. 2008. *Slavery by Another Name: The Re-Enslavement of Black Americans from the Civil War to World War II*. Doubleday.

Bruff, I. 2014. "The Rise of Authoritarian Neoliberalism." *Rethinking Marxism* 26, no. 1: 113–129. https://doi.org/10.1080/08935696.2013.843250.

Bruff, I., and C. B. Tansel. 2019. "Authoritarian Neoliberalism: Trajectories of Knowledge Production and Praxis." *Globalizations* 16, no. 3: 233–244. https://doi.org/10.1080/14747731.2018.1502497.

Bundesverfassungsgericht. 2023. *Judgment of the Second Senate of 20 June 2023, 2 BvR 166/16 and 2 BvR 1683/17*. Federal Constitutional Court.

Cate, S. D. 2022. "The Mississippi Model: Dangers of Prison Reform in the Context of Fiscal Austerity." *Punishment & Society* 24, no. 4: 715–741. https://doi.org/10.1177/14624745211006176.

Cavadino, M., and J. Dignan. 2006. *Penal Systems: A Comparative Approach*. Sage.

Childs, D. 2015. *Slaves of the State: Black Incarceration from the Chain Gang to the Penitentiary*. University of Minnesota Press.

Clegg, J. 2020. "A Theory of Capitalist Slavery." *Journal of Historical Sociology* 33, no. 1: 74–98. https://doi.org/10.1111/johs.12259.

CNN Türk. 2018. 50 binden fazla mahkûm 180 iş kolunda üretim yapıyor. https://www.cnnturk.com/ekonomi/turkiye/50-binden-fazla-mahk-m-180-is-kolunda-uretim-yapiyor-763246.

Corrections Corporation of America. 2013. *Annual Report on Form 10-K for the Fiscal Year Ended December 31, 2012*. US Securities and Exchange Commission. https://www.sec.gov/Archives/edgar/data/1070985/000119312513080296/d452767d10k.htm.

Council of Europe. 2006. *European Prison Rules*. Council of Europe Publishing. https://rm.coe.int/european-prison-rules-978-92-871-5982-3/16806ab9ae.

Crosson, J. B. 2023. "Immigration Policing as Holey war: Rings of Connection, Deadly Gaps, and State Loopholes in the Struggle for Asylum." *Sociology Lens* 36, no. 1: 31–43. https://doi.org/10.1111/johs.12406.

Curato, N., and D. Fossati. 2020. "Authoritarian Innovations: Crafting Support for a Less Democratic Southeast Asia." *Democratization* 27, no. 6: 1006–1020. https://doi.org/10.1080/13510347.2020.1777985.

Daniş, M. S. 2026. "An Examination of Cultural Transformation in Türkiye After 1980 in the Context of 'Neoliberal Governmentality." *Sociology Lens* 39, no. 3: 522–542. https://doi.org/10.1111/johs.70077.

Davis, A. Y. 2003. *Are Prisons Obsolete?*. Seven Stories Press.

DelSesto, M. 2021. "Contested Theories of Prison Labor Practice." *Sociology Compass* 15, no. 7: e12888. https://doi.org/10.1111/soc4.12888.

Disley, E., J. Rubin, E. Scraggs, N. Burrowes, and D. Culley. 2011. *Lessons Learned from the Planning and Early Implementation of the Social Impact Bond at HMP Peterborough*. Ministry of Justice.

Dolowitz, D. P., and D. Marsh. 2000. "Learning From Abroad: The Role of Policy Transfer in Contemporary policy-making." *Governance* 13, no. 1: 5–23. https://doi.org/10.1111/0952-1895.00121.

Dzur, A. W. 2012. *Punishment, Participatory Democracy, and the Jury*. Oxford University Press.

Escobar, O., and S. Elstub. 2017. "Forms of Mini-Publics: An Introduction to Deliberative Innovations in Democratic Practice." newDemocracy Research and Development Note 4. https://www.newdemocracy.com.au/research/research-notes/399-forms-of-mini-publics.

Esen, B., and S. Gumuscu. 2016. "Rising Competitive Authoritarianism in Turkey." *Third World Quarterly* 37, no. 9: 1581–1606. https://doi.org/10.1080/01436597.2015.1135732.

Ford, M., M. Gillan, and K. Ward. 2021. "Authoritarian Innovations in Labor Governance: The Case of Cambodia." *Governance* 34, no. 4: 1255–1271. https://doi.org/10.1111/gove.12559.

Foucault, M. 1977. *Discipline and Punish: The Birth of the Prison*. Allen Lane.

George, A. L., and A. Bennett. 2005. *Case Studies and Theory Development in the Social Sciences*. MIT Press.

Gillan, M., and M. Ford. 2024. "When Authoritarian Innovations Fail: Labour Governance in Myanmar's Reform Era and Beyond." *Journal of Industrial Relations* 66, no. 4: 629–648. https://doi.org/10.1177/00221856241269013.

Gilmore, R. W. 2007. *Golden Gulag: Prisons, Surplus, Crisis, and Opposition in Globalizing California*. University of California Press.

Glasius, M. 2018. "What Authoritarianism Is ... and is Not: A Practice Perspective." *International Affairs* 94, no. 3: 515–533. https://doi.org/10.1093/ia/iiy060.

Glasius, M. 2023. *Authoritarian Practices in a Global Age*. Oxford University Press.

Goodman, P. 2012. "Another Second Chance': Rethinking Rehabilitation Through the Lens of California's Prison Fire Camps." *Social Problems* 59, no. 4: 437–458. https://doi.org/10.1525/sp.2012.59.4.437.

Gupta, N., and R. K. Gupta. 2018. "Prison Reform and Work Programs in India: A Case Study." *International Journal of Human Rights and Constitutional Studies* 6, no. 2: 150–166. https://doi.org/10.1504/ijhrcs.2018.10015124.

Hartwell, C. A. 2026. "The Leaner, Meaner State—and What it Means for Society." *Sociology Lens* 39, no. 2: 277–288. https://doi.org/10.1111/johs.70049.

Hatton, E. 2020. *Coerced: Work Under Threat of Punishment*. University of California Press.

Hiller, E. T. 1914. "Labor Unionism and Convict Labor." *Journal of the American Institute of Criminal Law and Criminology* 5, no. 6: 851–879. https://doi.org/10.2307/1132562.

Hirst v the United Kingdom (No. 2). 2005. Application No. 74025/01, European Court of Human Rights (Grand Chamber).

Holligan, C. 2018. "Life in a Forgotten Scottish Gulag: Punishment and Social Regulation in HM Peterhead Convict Prison." *Journal of Historical Sociology* 31, no. 2: 165–181. https://doi.org/10.1111/johs.12170.

Hui, E. S. I. 2022. "Movement-Oriented Labour Organisations in an Authoritarian Regime: The Case of China." *Human Relations* 75, no. 7: 1354–1382. https://doi.org/10.1177/00187267211001433.

Human Rights Activists in Iran. 2024. "Annual Statistical Report of Human Rights Conditions in Iran 2023." https://www.en-hrana.org/wp-content/uploads/2023/12/HRA-Annual-Report-EN-122023.pdf.

Human Rights Watch. 2024. "Iran: Events of 2023." In *World Report 2024*. https://www.hrw.org/world-report/2024/country-chapters/iran.

Humphrey, P. 2022. *Forced Prison Labor in China: Hiding in Plain Sight*. Diplomat. https://thediplomat.com/2022/01/forced-prison-labor-in-china-hiding-in-plain-sight/.

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/johs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

International Labour Organization. 2007. *Eradication of Forced Labour: General Survey Concerning the Forced Labour Convention, 1930 (No. 29), and the Abolition of Forced Labour Convention, 1957 (No. 105). Report III (Part 1B), International Labour Conference, 96th Session*. ILO.

International Labour Organization. 1930. Forced Labour Convention, 1930 (No. 29).

International Labour Organization. 1957. Abolition of Forced Labour Convention, 1957 (No. 105).

International Labour Organization. 2014. *Protocol of 2014 to the Forced Labour Convention*, Vol. 1930. ILO.

James, N. 2013. *Federal Prison Industries: Overview and Legislative History*. CRS Report RL32380. Congressional Research Service.

Jarman, B., and H. Fair. 2024. *Working Prisoners in the USA: Laws, Policies, and Practical Realities*. Institute for Crime & Justice Policy Research. https://www.prisonstudies.org/sites/default/files/resources/downloads/working_prisoners_in_the_usa_final_0.pdf.

Jarman, B., and C. Heard. 2023. *Labouring Behind Bars: Assessing International Law on Working Prisoners*. Institute for Crime & Justice Policy Research. https://eprints.bbk.ac.uk/id/eprint/53263.

Jarman, B., and C. Heard. 2024. "Prison Work in Law and Reality: Comparative Perspectives From Brazil, the UK, and the US." *European Labour Law Journal* 15, no. 3: 541–562. https://doi.org/10.1177/20319525241263179.

Jones, T., and T. Newburn. 2007. *Policy Transfer and Criminal Justice: Exploring US Influence over British Crime Control Policy*. Open University Press.

Khajehnoori, Y., and Z. Jamshidi. 2023. "Humanitarian Approach Based on the Fundamental Rights of Prisoners." *Quarterly Journal of Judicial Law Views* 28, no. 102: 23–48.

Kurmanaev, A., A. Lobzina, and E. Bodyagina. 2023. *Russia Freed Prisoners to Fight its War. Here's How Some Fared*. New York Times. https://www.nytimes.com/2023/01/30/world/europe/wagner-convict-ukraine-russia.html.

Lacey, N. 2008. *The Prisoners' Dilemma: Political Economy and Punishment in Contemporary Democracies*. Cambridge University Press.

LeBaron, G. 2018. "Prison Labour, Slavery, and the State." In *Revisiting Slavery and Antislavery: Towards a Critical Analysis*, edited by L. Brace and J. O'Connell Davidson, 151–177. Palgrave Macmillan.

Levitsky, S., and L. A. Way. 2010. *Competitive Authoritarianism: Hybrid Regimes After the Cold War*. Cambridge University Press.

Lichtenstein, A. 1996. *Twice the Work of Free Labor: The Political Economy of Convict Labor in the New South*. Verso.

Lippke, R. L. 1998. "Prison Labor: Its Control, Facilitation, and Terms." *Law and Philosophy* 17, no. 5: 533–557. https://doi.org/10.1023/a:1006179322525.

Lührmann, A., M. Tannenberg, and S. I. Lindberg. 2018. "Regimes of the World (RoW): Opportunities and Challenges for Comparative Studies of Political Regimes." *Politics and Governance* 6, no. 1: 60–77. https://doi.org/10.17645/pag.v6i1.1214.

Mason, M., and R. McDowell. 2022. *US Prisoners Are Being Assigned Dangerous Jobs. But what Happens if They Are Hurt or Killed?*. Associated Press. https://apnews.com/article/prison-to-plate-inmate-labor-investigation-injuries-deaths-0ff52ff1735d7e9f858248177a2a60c3.

McGoogan, C. 2023. "'You're a Slave': Inside Louisiana's Forced Prison Labor and a Failed Overhaul Attempt." *Washington Post*. https://www.washingtonpost.com/nation/2023/01/01/louisiana-prison-labor-ballot-slavery/.

Meduza. 2024. "New Russian Law Lets Criminal Suspects Join the Army at Any Stage of Their Trial and Leaves Their Victims Living in Fear." *Medicine*. https://meduza.io/en/feature/2024/10/08/new-russian-law-lets-criminal-suspects-join-the-army-at-any-stage-of-their-trial-and-leaves-their-victims-living-in-fear.

Melossi, D., and M. Pavarini. 1981. *The Prison and the Factory: Origins of the Penitentiary System*. Macmillan.

Melville, D. 2025. "Inmates Can Make up Nearly a Third of Those Fighting California Fires." *Forbes*. https://www.forbes.com/sites/dougmelville/2025/01/09/inmates-makes-up-nearly-a-third-of-those-fighting-la-fires/.

Mollaie, M., M. Ghayumzadeh, and S. M. Mirkhalili. 2018. "Resocialization and Correcting Criminals in Iran's Criminal Policy." *Iranian Sociological Review* 8, no. 3: 19–32.

Noronha, E., and P. D'Cruz. 2024. "The Interface Between Authoritarian Innovations and Labour: Implications for the Indian Workforce." *Journal of Industrial Relations* 66, no. 4: 604–628. https://doi.org/10.1177/00221856241281776.

Office of the United Nations High Commissioner for Human Rights. 2023. Russian Federation: UN Experts Alarmed by Recruitment of Prisoners by Wagner Group. https://www.ohchr.org/en/press-releases/2023/03/russian-federation-un-experts-alarmed-recruitment-prisoners-wagner-group.

Oshinsky, D. M. 1996. *Worse Than Slavery: Parchman Farm and the Ordeal of Jim Crow Justice*. Free Press.

Pandeli, J., and R. Longman. 2025. "(Doing) Time is Money: Confinement, Prison Work and the Reproduction of Carceral Capitalism." *Work, Employment & Society* 39, no. 3: 727–747. https://doi.org/10.1177/09500170241292947.

Pandeli, J., M. Marinetto, and J. Jenkins. 2019. "Captive in Cycles of Invisibility? Prisoners' Work for the Private Sector." *Work, Employment & Society* 33, no. 4: 596–612. https://doi.org/10.1177/0950017018777712.

Pektaş, Ö. 2011. *Neoliberal Politikalar Çerçevesinde Sermayenin Mahkum Emeği Kullanımı Ve Türkiye Örneği*. Unpublished master's thesis. Istanbul Technical University.

Pieper, O. 2022. *How German Prisons Have Become a Debt Trap*. Deutsche Welle. https://www.dw.com/en/how-german-prisons-have-become-a-debt-trap/a-63402935.

Pratt, J. 2008. "Scandinavian Exceptionalism in an Era of Penal Excess. Part I: The Nature and Roots of Scandinavian Exceptionalism." *British Journal of Criminology* 48, no. 2: 119–137. https://doi.org/10.1093/bjc/azm072.

Prison Legal News. 2013. *Nation's Largest Private Prison Companies Trying to Do the REIT Thing*. Prison Legal News. 42. https://www.prisonlegalnews.org/news/2013/jan/15/nations-largest-private-prison-companies-trying-to-do-the-reit-thing.

Pruin, I. 2018. "Prisoner Resettlement in Germany: Regional Disparities of the Constitutional Aim of Social Reintegration." In *Prisoner Resettlement in Europe*, edited by F. Dünkel, I. Pruin, A. Storgaard, and J. Weber, 150–166. Routledge.

Reich, A. 2024. "From Hard Labor to Market Discipline: The Political Economy of Prison Work, 1974 to 2022." *American Sociological Review* 89, no. 1: 126–158. https://doi.org/10.1177/00031224231221741.

Reisz, M. 2023. *Supervising PhDs Behind Bars Breaks New Ground in Research*. Higher Education. https://www.timeshighereducation.com/news/supervising-phd-behind-bars-breaks-new-ground-research.

Rhomberg, C. 2024. "Authoritarian Innovation in the United States: The Role of Dual Subnational Systems of Labor Governance." *Journal of Industrial Relations* 66, no. 4: 519–537. https://doi.org/10.1177/00221856241260770.

Richey, L. A. 2024. "Why Does Capitalism Feel so Right? Ethical Imaginaries of Prison Labour and Sisterhood Solidarity." *Economy and*

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/jpbs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License

Society 53, no. 2: 250–274. https://doi.org/10.1080/03085147.2024.2321778.

Rusche, G., and O. Kirchheimer. 1939. *Punishment and Social Structure*. Columbia University Press.

Şahin, İ. 2019. *58 bin mahkûm 43 yeni Cezaevi Inşa Edecek*. Sözcü. https://www.sozcu.com.tr/58-bin-mahkum-43-yeni-cezaevi-insa-edecek-wp4732721.

Schultheis, E. 2024. *California Proposition 6: The Complex Path to Banning Forced Labor in Prison*. Politico. https://www.politico.com/news/2024/10/28/california-slavery-ban-prop-6-00185942.

Shammas, V. L. 2017. "Prisons of Labor: Social Democracy and the Triple Transformation of the Politics of Punishment in Norway, 1900–2014." In *Scandinavian Penal History, Culture and Prison Practice: Embraced by the Welfare State?*, edited by P. S. Smith and T. Ugelvik, 57–80. Palgrave Macmillan.

Shaw, V. N. 1998. "Productive Labor and Thought Reform in Chinese Corrections: A Historical and Comparative Analysis." *Prison Journal* 78, no. 2: 186–211. https://doi.org/10.1177/0032885598078002007.

Silk, J. 2024. *India: Top Court Rules Against Caste-Based Tasks in Prisons*. Deutsche Welle. https://www.dw.com/en/india-top-court-rules-against-caste-based-tasks-in-prisons/a-70409131.

Smismans, S. 2024. "Brexit and Labour Governance: Authoritarian Innovations in the United Kingdom." *Journal of Industrial Relations* 66, no. 4: 538–557. https://doi.org/10.1177/00221856241280452.

Solomon, E., and K. Edgar. 2004. *Having Their Say: The Work of Prisoner Councils*. Prison Reform Trust.

Someda, K. 2022. "Community-Based Rehabilitation in Japan: Some Unique Characteristics of the Japanese System and Recent Developments." In *The Palgrave Handbook of Global Rehabilitation in Criminal Justice*, edited by M. Vanstone and P. Priestley, 307–323. Palgrave Macmillan.

Sukanya Shantha v Union of India, 2024 Sukanya Shantha v Union of India. 2024. Writ Petition (Civil) No. 1404 of 2023, Supreme Court of India.

Teixeira, F. 2020. *Brazil Found Unlawfully Extending Unpaid Prison Labor Program*. Thomson Reuters Foundation News. https://news.trust.org/item/20200408042208-od22x/.

Thompson, H. A. 2012. "The Prison Industrial Complex: A Growth Industry in a Shrinking Economy." *New Labor Forum* 21, no. 3: 39–47. https://doi.org/10.4179/nlf.213.0000006.

Thompson, S. 2022. "Forced Identity Performances, Self-Identification, the Material, and Ballotee Bevin Boys in WWII UK 1943–1948." *Journal of Historical Sociology* 35, no. 4: 488–506. https://doi.org/10.1111/johs.12391.

Turner, J., M. O. Rosenblat, N. Guruli, and J. Simon. 2022. *Captive Labor: Exploitation of Incarcerated Workers*. American Civil Liberties Union and University of Chicago Law School Global Human Rights Clinic. https://www.aclu.org/publications/captive-labor-exploitation-incarcerated-workers.

Ugelvik, T. 2016. "Prisons as Welfare Institutions? Punishment and the Nordic Model." In *Handbook on Prisons*, edited by Y. Jewkes, B. Crewe, and J. Bennett. 2nd ed., 388–402. Routledge.

United Nations Human Rights Council. 2016. *Report of the Commission of Inquiry on Human Rights in Eritrea-A/HRC/32/47*. United Nations.

United Nations Human Rights Council. 2014. *Report of the Commission of Inquiry on Human Rights in the Democratic People's Republic of Korea-A/HRC/25/63*. United Nations.

United Nations Human Rights Council. 2015. *Report of the Commission of Inquiry on Human Rights in Eritrea-A/HRC/29/42*. United Nations.

V-Dem Institute. 2025. *Democracy Report 2025: 25 Years of Autocratization, Democracy Trumped?* V-Dem Institute, University of Gothenburg.

Wacquant, L. 2009. *Punishing the Poor: The Neoliberal Government of Social Insecurity*. Duke University Press.

Wang, J. 2018. *Carceral Capitalism*. Semiotext(e).

World Prison Brief. 2025. *Highest to Lowest: Prison Population Rate*. Institute for Crime & Justice Policy Research. https://www.prisonstudies.org/highest-to-lowest/prison_population_rate.

Xu, V. X., D. Cave, J. Leibold, K. Munro, and N. Ruser. 2020. *Uyghurs for Sale: 'Re-Education', Forced Labour and Surveillance Beyond Xinjiang*. Australian Strategic Policy Institute. https://www.aspi.org.au/report/uyghurs-sale.

Zadora, A. 2026. "The Soviet Legacy of Social Mobility and Control in Belarus: Engineered Dependence as a Durable Authoritarian Resource." *Sociology Lens*. https://doi.org/10.1111/johs.70071.

Zatz, N. D. 2008. "Working at the Boundaries of Markets: Prison Labor and the Economic Dimension of Employment Relationships." *Vanderbilt Law Review* 61, no. 3: 857–958.

Zenz, A. 2019. "Beyond the Camps: Beijing's Long-Term Scheme of Coercive Labor, Poverty Alleviation and Social Control in Xinjiang." *Journal of Political Risk* 7, no. 12: 1–23.

Supporting Information

Additional supporting information can be found online in the Supporting Information section.

Table S1: Source base and reliability by case.

2832580x, 0, Downloaded from https://onlinelibrary.wiley.com/doi/10.1111/johs.70100 by NICE, National Institute for Health and Care Excellence, Wiley Online Library on [20/11/2026]. See the Terms and Conditions (https://onlinelibrary.wiley.com/terms-and-conditions) on Wiley Online Library for rules of use; OA articles are governed by the applicable Creative Commons License