



Ministry
of Justice

Strengthening the Independent Scrutiny Bodies through Legislation

New Methodologies and Strategy Team, Arm's Length Bodies Performance, Sponsorship
and Intelligence Division

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Introduction

1. The Arm's Length Bodies (ALBs) that we sponsor all play a vital role in ensuring transparency; driving up standards and outcomes for those in our care by independently scrutinising the establishments and services that the Ministry of Justice (MoJ) provide. They are: The Prisons and Probation Ombudsman (PPO), Her Majesty's Inspectorate of Prisons (HMI Prisons), Her Majesty's Inspectorate of Probation, the Independent Monitoring Boards (IMBs) and the Lay Observers (LOs). In addition, the Independent Advisory Panel on Deaths in Custody (IAP), which is co-sponsored by the Home Office and the Department of Health and Social Care, also provides fundamental advice to Government on the prevention of deaths in custodial settings. The National Preventive Mechanism (NPM) was set up as a requirement of the Optional Protocol to the UN Convention Against Torture, which the UK Government ratified in 2003. NPM bodies undertake regular visits to places of detention in order to prevent torture and other ill-treatment.
2. The proposals set out in this consultation explore a number of options to strengthen the ALBs' ability to scrutinise and improve accountability. Our proposals range from doing nothing to providing a statutory footing; or being more radical in our thinking by joining some scrutiny bodies together. At this stage, all options are open as we consult with those impacted. Please note that this is not a public consultation but is directed at those involved and organisations that have an interest in the proposals, including HMPPS and HMCTS.
3. In addition to legislation, we have also decided to review the length of tenure for our senior public appointees using non-legislative processes and would like to hear your thoughts on this.

Prisons and Probation Ombudsman (PPO)

4. The PPO is a public appointee with a dual role of investigating deaths in custody and handling complaints. The PPO provides essential lessons learnt from investigations of both deaths in custody and the handling of complaints.
5. The PPO investigates the deaths of prisoners, young people in detention, approved premises' residents and immigration detainees due to any cause, including apparent suicides and natural causes. The PPO also carries out investigations that are referred to them by the Secretary of State, these are known as exceptional investigations and are investigations that take place outside of the PPO's remit. Although not currently within remit, the PPO also carries out exceptional investigations into the deaths of offenders in PECS custody, whether on transfer or at court. The PPO also has the discretion to carry out other fatal incident investigations that raise issues about the care provided by the services in remit, such as post-release deaths.
6. The PPO investigates *complaints* made by prisoners, young people in detention (prisons, young offender institutions (YOIs) and secure training centres), offenders

under probation supervision and immigration detainees. A complaint must first be routed through the internal complaints system of the relevant institution before it is lodged with the PPO.

7. The PPO works to terms of reference set by the Secretary of State for Justice and reports directly to him. The PPO currently has no statutory remit though there have been previous attempts to place it on a statutory footing.

Her Majesty's Inspectorate of Prisons (HMI Prisons)

8. HMI Prisons is an independent Inspectorate which reports on conditions for and treatment of those in a wide variety of detention facilities including prisons, YOIs, and immigration detention facilities.
9. HM Chief Inspector of Prisons for England and Wales (HMCIP) is a Crown appointment, made on the advice of the Secretary of State for Justice, and subject to pre-appointment scrutiny by the Justice Select Committee. The role was established by the Criminal Justice Act 1982 as an amendment to the Prison Act 1952.
10. HMI Prisons inspects prisons, young offender institutions and court custody suites in England and Wales; they inspect all places of immigration detention in the UK; and they inspect prisons in Northern Ireland, the Channel Islands and the Isle of Man on invitation. HMI Prisons also inspect military detention facilities on invitation. In addition, they jointly-inspect police and border force customs custody suites with HM Chief Inspector of Constabulary and jointly-inspect secure training centres with Ofsted.
11. HMI Prisons is a member of the UK's NPM under the Optional Protocol on the Convention Against Torture (OPCAT).

Independent Monitoring Boards (IMBs)

12. IMBs are unpaid ministerial public appointees who provide statutory, independent oversight of the treatment and care of prisoners (in England and Wales) and immigration detainees (throughout the UK) on behalf of Ministers and the public. They report to the Secretary of State for Justice/Home Secretary on any matter which they consider to be expedient to report on and all IMBs produce an annual report to which a reply from the Minister is produced. IMBs are members of the UK's NPM under OPCAT.
13. Each IMB is already enshrined in legislation (Prison Act 1952 and Immigration and Asylum Act 1999) but the national governance structure – which includes the IMB Management Board and the National Chair– is not. The current IMB structure is complex; it has 1400 volunteers across 128 bodies and two departments (MoJ and Home Office). The IMBs are also supported by a Secretariat which is made up of paid staff who are MoJ civil servants.
14. The Prison Act 1952 and the Immigration and Asylum Act 1999 require every prison, Immigration Removal Centre (IRC) and Short Term Holding Facility (STHF) to be monitored by an independent Board appointed by the Secretary of State for

Justice/Home Secretary from members of the community in which the prison or centre is situated. They have a statutory power to enter any prison, IRC or STHF and hear complaints which may be made to them.¹

15. To enable the Board to carry out its duties effectively, its members have right of access to every detained person, to every part of the establishment and also to the establishment's records.

Lay Observers (LOs)

16. LOs are unpaid ministerial public appointees who provide statutory, independent oversight of the treatment and care of detained persons under the care of Prison Escort and Custody Service (PECS) contractors in England and Wales on behalf of the Secretary of State for Justice and the public, particularly with regard to their welfare and just treatment. Lay Observers are enshrined in legislation (Criminal Justice Act 1991) but the National Governance structure - which includes the National Council and National Chair is not. Individual LOs are appointed by the Secretary of State. The LOs are also part of the NPM under OPCAT.
17. The LOs produce an annual report, written by the Chair of the National Council and addressed to the Secretary of State for Justice, which makes specific recommendations of actions to take.
18. The LOs are supported by a Secretariat and overseen by a National Council, whose Chair is responsible for recruitment and training; agreeing national policies; ensuring completion of visits and reports; and bringing concerns to the attention of PECS, who then manage the contractors.
19. To enable the LOs to carry out their duties effectively, they have right of access to every detained person, to every part of the court custody suites and transport vehicles and relevant documents relating to the detainees.

Her Majesty's Inspectorate of Probation (HMI Probation)

20. HMI Probation for England and Wales is an independent Inspectorate which reports on probation services.
21. HM Chief Inspector of Probation is a statutory public appointment with a duty to report to the Secretary of State for Justice. Beyond the statutory remit to submit reports, the Chief Inspector has an important role in giving objective insight to ministers. Like HMCI Prisons, the HMCI Probation's reports are wholly independent from the inspected bodies and Ministers. The Chief Inspector sets his own methodology and inspection programme (in consultation with ministers). He has no powers of sanction and his leverage rests on the credibility of the Inspectorate's reports.

¹ The Ministry of Defence are statutorily required to have an IMB at the Military Corrective Training Centre (MCTC). Recruited and managed by the MOD they conduct independent monitoring of the MCTC and report directly to the Secretary of State for Defence. Their role and responsibilities are contained in the Service Custody and Service of Relevant Sentences Rules 2009 (SCSRSR09).

22. HMI Probation inspects all aspects of adult offending including the National Probation Service and Community Rehabilitation Companies.
23. HMI Probation also inspects youth offending services and carries out subject based 'thematic' inspections, often in tandem with other criminal justice inspectorates.
24. Youth Offending Team (YOT) inspections are based on a 'risk and random' approach. While this means their timing can be adventitious, YOTs are inspected approximately every four years. The targeted and intelligence-led approach to these inspections means some YOTs can be inspected more frequently. Inspections are based on published standards that cover a broad range of YOT work including out of court disposals. Some inspections are conducted jointly with other inspectorates due to the holistic nature of youth offending work.

Independent Advisory Panel on Deaths in Custody (IAP)

25. The IAP is a non-departmental public body co-sponsored by the Ministry of Justice, the Home Office and the Department for Health and Social Care. The role of the IAP is to provide independent advice and expertise on preventing deaths in custody to Ministers, operational leads and the Ministerial Board on Deaths in Custody. The IAP aims to bring about a continuing and sustained reduction in the number and rate of deaths, natural and self-inflicted, which occur in prisons, in or immediately following police custody, immigration detention, the deaths of residents of approved premises and the deaths of those detained under the Mental Health Act (MHA 1983) in hospital and secure health settings. The principles and lessons learned as part of this work also apply to the deaths of those detained under the Mental Capacity Act in hospital. The chair of the IAP and its five expert panel members are public appointees.

National Preventive Mechanism (NPM)

26. The NPM, which was established in 2009, is currently composed of 21 independent inspection, monitoring and visiting bodies covering the whole of the UK. It was set up as a requirement in compliance with the United Nations' Optional Protocol on the Convention Against Torture (OPCAT), or Other Cruel, Degrading or Inhuman Treatment or Punishment; an Optional Protocol to one of the United Nations human rights treaties. The UK ratified OPCAT in December 2003. The NPM covers all places of detention, including prisons, immigration facilities, police custody, court custody, customs custody, mental health institutions and some educational settings. A list of the bodies which make up the NPM is at **Annex A**.
27. The primary purpose of the NPM is to prevent torture and other cruel, inhuman and degrading treatment or punishment by regularly monitoring all detention places across the UK. It works to establish and share best practice across its members and reports annually on its activities.
28. The role of the NPM, as set out in Article 19 of OPCAT, is:
 - To regularly examine the treatment of the persons deprived of their liberty in places of detention as defined in article 4, with a view to strengthening, if

necessary, their protection against torture and other cruel, inhuman or degrading treatment or punishment.

- To make recommendations to the relevant authorities with the aim of improving the treatment and the conditions of the persons deprived of their liberty and to prevent torture and other cruel, inhuman or degrading treatment or punishment, taking into consideration the relevant norms of the United Nations.
- To submit proposals and observations concerning existing or draft legislation.

29. OPCAT also requires the UK, as a party to, it, to grant the NPM:

- Access to all information concerning the number of persons deprived of their liberty in places of detention as defined in article 4, as well as the number of places and their location.
- Access to all information referring to the treatment of those persons as well as their conditions of detention.
- Access to all places of detention and their installations and facilities.
- The opportunity to have private interviews with the persons deprived of their liberty without witnesses, either personally or with a translator if deemed necessary, as well as with any other person who the NPM believes may supply relevant information.
- The liberty to choose the places they want to visit and the persons they want to interview.
- The right to have contacts with the Subcommittee on Prevention of Torture, to send it information and to meet with it.

The Case for Change

30. There have been long standing calls for the system around detention scrutiny and oversight to be reformed. Whilst the ALBs that we sponsor all provide much needed scrutiny and advice on the system, the roles and responsibilities of these various bodies have evolved over time and have created a complicated landscape of independent scrutiny. MoJ is therefore interested in reconsidering the prison scrutiny infrastructure in the round and whether more systemic change is warranted.
31. These bodies provide essential oversight through inspecting, investigating and monitoring the prison and probation systems. Therefore, we want to ensure that the oversight regime is the most effective it can be. The roles of some ALBs overlap, and there is a risk that the current lack of clarity over responsibilities may affect the ability of the ALBs to make long-term meaningful change. Overlap between the roles of some ALBs can also lead to the duplication of reports which in turn increases the workload of the inspection bodies. There is a possibility that this resulting workload, could dilute the focus on other, more thematic, approaches to scrutinising the system, which could be prioritised if duplicate workload was reduced.
32. We are interested in renewing not just the fabric of the prison system itself, but also the way in which it is scrutinised. We believe there is merit in looking at whether the ALBs could be structured more efficiently and their responsibilities more clearly defined to collectively provide sharper scrutiny, thereby improving outcomes for service users and the prison/detention facility through enhancing accountability and standards.
33. Furthermore, we would like to consider whether some individual ALBs might benefit from strengthened powers through legislation that would enhance their scrutiny abilities. It is our intention that by expanding, through legislation, the investigative powers of some bodies, this will help to drive performance and improve outcomes.

Options

(1) Maintain the status quo

34. This option would mean that the ALBs we sponsor would retain their current status (some who are non-statutory) and roles. The status quo is functional and effective and would avoid the risk of ossifying the roles of the ALBs in statute. Arguably, this would make them more flexible and able to react to future challenges. Furthermore, there may be a risk that focusing on restructuring the prison scrutiny bodies would draw away time and resources, and hamper the ALBs from responding to the unique or emerging challenges over the next few years (such as the need to address prison capacity and workforce). However, not doing anything would mean we lose the opportunity to strengthen the standing and independence of the ALBs and improve the scrutiny of prisons and other settings by looking at more collaborative ways of working.

(2) Statutory status

35. This option would provide all or some of the ALBs with statutory status where they do not already have it. Strengthening the legislative powers of the scrutiny bodies could enhance the independence and credibility of the bodies, thereby improving their ability to drive change across the custodial system, improving transparency and leading to better offender outcomes. Additionally, placing certain powers into statute may assist the ALBs in achieving better system outcomes, for example:

Prison and Probation Ombudsman

- Statutory status would enable us to give the PPO more powers to require the production of relevant documents which could lead to better investigations and result in more informed recommendations.

HMI Prisons

- Although the Chief inspector is a statutory office holder, the Inspectorate is not currently referred to in statute. Recognising the Inspectorate could improve HMI Prisons' authority to engage with stakeholders, and we could also use this opportunity to formalise existing practice across HMI Prison's jurisdictions such as their ability to access places, people and information, as well as the Urgent Notification procedure which applies when the Chief Inspector raises urgent concerns to the Lord Chancellor, who then has 28 days to publicly respond.

HMI Probation

- HMI Probation already has statutory status, but we have an opportunity to place their remit to inspect Youth Offending Teams (YOTs) in legislation. Currently, there is a Ministerial Direction conferring this function on HMI Probation given by Jeremy Wright (former Parliamentary Under Secretary of State for Justice) under Section 7(6) of the Criminal Justice and Courts Services Act 2000. It makes HMI Probation responsible for inspecting and reporting on Youth Offending Teams and bodies acting on their behalf, and includes assessing the quality of their work with children and young people who have offended, are suspected of having offended or are at the risk of offending.

Independent Monitoring Boards

- The existence of the IMB's Chair and Management Board could be recognised in legislation to provide a clearer structure between them and local boards. This would provide a clearer governance structure and could strengthen the Board's ability to provide oversight, issue guidance and recognise good practice with a view to encouraging it elsewhere.

Lay Observers

- The position of Chair of the LOs and the National Council could be established in statute. As recognised elsewhere in this consultation, it is hoped that formalising these roles in statute will add legitimacy and authority to the LOs, aid them in engagement with stakeholders and, ultimately, improve outcomes.

Independent Advisory Panel

- This would also be an opportunity to provide statutory status for the IAP and state its purpose of providing independent advice with the central aim of preventing deaths in custody. This provision is clarificatory in nature and designed to enhance the legitimacy of the IAP.

36. Further enhancing the independence and standing of the bodies could be achieved on a number of different levels. One option, for those bodies that require it, is to reclassify them as Non-Departmental Public Bodies (NDBPs). The benefit of this would be that it would enable ALBs to employ their own public servants and gain a greater degree of independence from the MoJ. As part of this consultation, we will explore, with Cabinet Office, the public bodies classification for each of these organisations to best complement their status and any strengthening of powers.

(3) Merging IMBs and LOs

37. This option would seek to merge the IMBs and LOs, who already share a secretariat, to create one single body which combines the functions of the IMBs and LOs. This would align with arrangements for monitoring immigration detention where IMBs monitor both Immigration Removal Centres and the escorting and holding room arrangements. If the IMBs and LOs are merged, the organisation could be led by a full-time remunerated Chair. We would need to look at current legislation around local structures and whether that should continue.
38. The advantages of this option are that merging the bodies could potentially enable the IMBs and LOs to share resources and functions, providing closer ways of working. Conversely, whilst the two bodies share similar roles and the same secretariat, the monitoring frameworks for the organisations are currently different. We would need to explore whether streamlining the IMBs and LOs monitoring frameworks would be a practical option.

(4) Merging the IMBs, LOs and HMI Prisons (known as the ‘Scottish model’)

39. This option that we are putting forward would merge both the IMBs and LOs with HMI Prisons, replicating the position in HMI Prisons Scotland where the Chief Inspector of Prisons Scotland has the responsibility for prison inspections, prison monitoring and prisoner escorts. Both scrutiny bodies would sit under HMCIP, bringing both areas (LOs and IMBs) under the leadership of the Chief Inspector, which would allow him to oversee, evaluate and direct independent monitoring in these settings – prisons, IRCs, STHF and PECS. The Scottish Government believe that this amalgamation provides a more robust form of independent monitoring by ensuring consistent practices and clearly defined roles, responsibilities and accountability throughout the relevant scrutiny bodies. This option would mean that these bodies would work more collaboratively, sharing live information from weekly monitoring with the Inspectorate and would enable the Inspectorate to focus more on thematic issues.
40. A disadvantage to adopting this approach is likely to be the cost of putting in place the necessary management structure given the much larger scale of prison monitoring in England and Wales. We will develop a more accurate cost estimate if this option proceeds to legislation.

Extension of tenure

41. We are also seeking views on whether we should extend the tenure of our senior public appointees heading up the organisations we sponsor from 3 years to 5 years through non-legislative processes. Extending the tenure of our senior public appointments will enable better business planning as appointees will have a longer term through which to plan and embed long-term changes. MoJ has also noted that

a substantial proportion of appointments are extended. Conversely, the higher turnover that a three-year term allows for provides a ready stream of new ideas and management styles that some ALBs may find valuable.

Further suggestions

42. We are aware that there are many other potential ways of strengthening the ALBs and are mindful of the considerable expertise that our stakeholders possess in this subject. As such, we would be happy to consider any further models or recommendations the recipients of this consultation may have.

Questions

PPO

- a) Do you agree that the PPO should be established in legislation?

Please give a reason/s for your answer.

- b) Do you agree that a statutory power should be created for the PPO to access places, people and documents?

Please give a reason/s for your answer.

- c) Do you think that the PPO should be reclassified as a Non-Departmental Public Body?

Please give a reason/s for your answer.

- d) Are there any further legislative provisions you'd like to see for the PPO?

Please explain.

HMI Prisons

- e) Do you agree that the 'Inspectorate' should be recognised in statute?

Please give a reason/s for your answer.

- f) Do you agree that HMI Prisons should be given a statutory power to access places, people and documents which reflects the power they already have?

Please give a reason/s for your answer.

- g) Do you think that HMI Prisons should be reclassified as a Non-Departmental Public Body?

Please give a reason/s for your answer.

- h) Are there any further legislative provisions you'd like to see for HMI Prisons?

Please explain.

HMI Probation

- i) Do you agree that HMI Probation's responsibility for the inspection of YOTs should be put into legislation?

Please give a reason/s for your answer.

- j) Do you think that HMI Probation should be reclassified as a Non-Departmental Public Body?

Please give a reason/s for your answer.

- k) Are there any further legislative provisions you'd like to see for HMI Probation?

Please explain.

IMBs

- l) Do you agree that the Chair of the IMBs should be placed in statute?

Please give a reason/s for your answer.

- m) Do you agree that the National Management Board should be placed in statute?

Please give a reason/s for your answer.

- n) Do you think that the IMBs should be reclassified as a Non-Departmental Public Body?

Please give a reason/s for your answer.

- o) Are there any further legislative provisions you'd like to see for the IMBs?

Please explain.

LOs

- p) Do you agree that the position of Chair should be placed in statute?

Please give a reason/s for your answer.

- q) Do you agree that the National Council should be placed in statute?

Please give a reason/s for your answer.

- r) Do you think that the LOs should be reclassified as a Non-Departmental Public Body?

Please give a reason/s for your answer.

- s) Are there any further legislative provisions you'd like to see for the LOs?

Please explain.

IAP

- t) Do you agree that the IAP and its purpose of providing independent advice with the central aim of preventing deaths in custody should be established in legislation?

Please give a reason/s for your answer.

Merging IMBs and LOs

- u) Do you think that the IMBs and LOs should be merged to make one body?

Please give a reason/s for your answer.

'The Scottish Model'

- v) Do you think that HMI Prisons, the IMBs, and the Lay Observers should all be merged under HMI Prisons (the Scottish model) reflecting what HMI Prisons Scotland have where HM's Chief Inspector of Prisons for Scotland (HMCIPS) has the responsibility for prison inspections, prison monitoring and prisoner escorts?

Please give a reason/s for your answer.

Other

- a) Are there any other models that have not been outlined in this consultation document that you think would work?
- b) Do you think we should extend the tenure of our senior public appointees heading up the organisations we sponsor from 3 years to 5 years through non-legislative processes?

Please give a reason/s for your answer

The National Preventive Mechanism

43. We are also considering legislating to place the UK's NPM on a statutory footing.
44. The primary purpose of the NPM is to prevent torture and other cruel, inhuman and degrading treatment or punishment by regularly monitoring all detention places across the UK.
45. Whilst individual independent members of the NPM have a statutory basis, the NPM itself does not have a basis in domestic legislation nor does it have any statutory powers as a body, although some of its individual members do. The IMBs, LOs and HMI Prisons are all members of the NPM and so there will be some overlap with the questions asked in respect of those bodies.
46. The UK Government considers that it is fully compliant with its obligations under OPCAT with the Optional Protocol itself silent on whether a legislative footing is needed. However, we have listened to the concerns of the UK's NPM and international bodies such as the UN Sub-Committee on Prevention of Torture and other Cruel, Inhuman or Degrading Treatment or Punishment on this point. We continue to explore how these concerns may be addressed including discussing possible legislative options.
47. Any legislation for the NPM is likely to require detailed consideration and discussion with the NPM, its members and Government departments. As a body with members working in England, Northern Ireland, Scotland and Wales, any legislative proposals would also need to be discussed with the Devolved Administrations.
- 48. We would welcome your views on giving the NPM a possible statutory basis and how this might be done in light of the particular nature of the NPM.**

Responding to this consultation

49. We have set out various options for legislation that could be taken and we are very keen to hear your thoughts. As this is a consultation, we have not made a final decision on any of the options contained in this document. We would appreciate the views of key stakeholders.

50. We would be grateful if your organisation could address any proposals that they feel they would support or oppose, and provide reasons as to why.

The deadline for providing a response is Wednesday 30th September.

51. We welcome views on the proposals set out in this document.

Please can you return your comments to us via our online portal:

<https://consult.justice.gov.uk/digital-communications/strengthening-the-independent-scrutiny-bodies>

52. If you have any queries, please contact the MoJ via email to:

ScrutinyBodiesConsultationQueries@justice.gov.uk

53. Unfortunately, we are not able to accommodate inquiries or responses via post due to current remote working resulting from Covid-19 arrangements.

54. Representative groups are asked to give a summary of the people and organisations they represent when they respond.

Alternative Formats

55. As specified above, you should contact us as specified above should if you require a copy of this document in any other format e.g. Welsh language, Braille, large font or audio.

What will happen next?

56. After the closing date, we will review all the responses to this document and use the views expressed to inform the development of potential primary legislation, if appropriate.

Confidentiality and Disclaimer

This is not a public consultation, however, the information you send us may be passed to colleagues within the Ministry of Justice, other Government Departments, Parliament and related agencies.

Information provided in response to this document, including personal information, may be published or disclosed in accordance with the access to information legislation (primarily the Freedom of Information Act 2000 (FOIA), the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA)).

If you want the information that you provide to be treated as confidential, please be aware that, under FOIA, there is a statutory Code of Practice with which public authorities must comply and which sets out, amongst other things, the obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.

An automatic confidentiality disclaimer generated by your IT system will not, by itself, be regarded as binding on the MoJ.

Please ensure that your response is marked clearly if you wish your response and name to be kept confidential. Confidential responses will be included in any statistical summary of numbers of comments received and views expressed.

The MoJ will process your personal data in accordance with GDPR and DPA – in the majority of cases this will mean that your personal data will not be disclosed to third parties.

Thank you for participating in this consultation exercise.

Annex A

BODIES IN THE NATIONAL PREVENTIVE MECHANISM

Care Inspectorate

Care Inspectorate Wales

Care Quality Commission

Criminal Justice Inspection Northern Ireland

Healthcare Inspectorate Wales

Her Majesty's Inspectorate of Constabulary and Fires & Rescue Services

Her Majesty's Inspectorate of Constabulary in Scotland

Her Majesty's Inspectorate of Prisons

Her Majesty's Inspectorate of Prisons for Scotland

Independent Custody Visiting Association

Independent Custody Visitors Scotland

Independent Monitoring Boards

Independent Monitoring Boards Northern Ireland

Independent Reviewer of Terrorism Legislation

Lay Observers

Mental Welfare Commission for Scotland

Northern Ireland Policing Board Independent Custody Visiting Scheme

Office for Standards in Education, Children's Services and Skills (Ofsted)

Regulation and Quality Improvement Authority

Scottish Human Rights Commission

The Children's Commissioner for England



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