



HM Prison &
Probation Service

Action Plan Submitted: 18th December 2020

A Response to: A thematic review of minority ethnic prisoners' experiences of rehabilitation and release planning

Report Published: October 2020

INTRODUCTION

HM Inspectorate of Prisons (HMIP) and HM Inspectorate of Probation for England and Wales are independent inspectorates which provide scrutiny of the conditions for, and treatment of prisoners and offenders. They report their findings for prisons, Young Offender Institutions and effectiveness of the work of probation, Community Rehabilitation Companies (CRCs) and youth offending services across England and Wales to Ministry of Justice (MoJ) and Her Majesty's Prison and Probation Service (HMPPS).

In response to the report HMPPS / MoJ are required to draft a robust and timely action plan to address the recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plans provides specific steps and actions to address these. Actions are clear, measurable, achievable and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the HMPPS web-based Prison Finder. Progress against the implementation and delivery of the action plans will also be monitored and reported on.

Actions against target dates may be delayed due to COVID-19 disruptions to service delivery.

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measurable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.

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ACTION PLAN: A thematic review of minority ethnic prisoners' experiences of rehabilitation and release planning

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner (including named individuals and their functional role or department)	6. Target Date
1.	<p>National and local HM Prison and Probation Service (HMPPS) strategies relating both to rehabilitation and release planning (RRP) and equality and diversity should consider how to increase BME and GRT prisoners' access to the potential benefits of 'rehabilitative culture'. The diversity of experience between different minority ethnic groups should be an explicit part of this effort. These strategies should specifically consider how to:</p> <ul style="list-style-type: none"> • increase understanding among prison staff of BME and GRT prisoners' distinctive experiences of 	Agreed	<p>HM Prison and Probation Service (HMPPS) will review National and Local Strategies relating to rehabilitation and release planning (RRP), and equality and diversity. Consideration will be taken in these reviews to understand the cultural backgrounds and needs of Black Minority Ethnic (BME) and Gypsy Roma Traveller (GRT) prisoners, to increase and promote the benefits of rehabilitative culture.</p> <p>To increase the understanding among prison staff of BME and GRT prisoners' experiences, and how ethnic identity may influence prisoners' access to and engagement with rehabilitative work, HMPPS will:</p> <ul style="list-style-type: none"> • Undertake a gap analysis on staff's cultural awareness, to determine what level of support, and in what guise, is required incorporating intersectionality. • Increase staff awareness by incorporating the influence of ethnic identity on access to, and engagement with rehabilitative work, by incorporating awareness raising into the HMPPS Diversity and Inclusion (D&I) Strategy, Race Action Plan (RAP) and Group and Local D&I Action Plans. 	<p>Chief Operating Officer Prisons/Deputy Director, Strategic Development Group /Chief Probation Officer</p> <p>Deputy Director, Strategic Development Group</p>	<p>June 2021</p> <p>June 2021</p>

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			<p>of personal circumstances and issues pre-release, which can then inform a more individualised release plan.</p> <ul style="list-style-type: none"> From June 2021 Regional Probation Directors (RPD) will identify any gaps in provision, and commission services based on the specific needs for their areas into their annual business planning cycles as required. <p>To improve rehabilitative culture across the prison estate, HMPPS will:</p> <ul style="list-style-type: none"> All establishments have been provided with a Rehabilitative Culture handbook, which, when updated in 2021 will include cultural awareness information to assist Governors and staff in their decision making and discussions with prisoners. Regional D&I leads will support establishments in embedding this into meetings, decision making and discussions with staff and prisoners. Establishments will hold quarterly engagement forums with BME and GRT prisoners, where rehabilitative culture will be an agenda item for discussion, to help drive rehabilitative culture within these cohorts of prisoners. Establishments will also hold a series of annual engagement forums with staff and all prisoners to coincide with reviews of Rehabilitative Culture Strategies, not just those from BME and GRT cohorts, to gain an understanding of their perceptions of rehabilitative culture, and how it can be effectively communicated and delivered. The Rehabilitative Culture Strategy will be reviewed annually in all prisons. 	Executive Director Public Sector Prisons North, and Rehabilitation Lead	July 2021
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2.	To identify and address potential discrimination, a wide range of data relating to activities, rehabilitative work and release planning should be systematically collected, broken down by ethnicity, shared and discussed with prisoners, and among all agencies working in prisons. This data should encompass both participation and outcomes. It should be sophisticated enough to draw out differences in experiences between different ethnic groups.	Agreed	<p>To ensure HMPPS captures the data necessary to identify and address potential discrimination we will:</p> <ul style="list-style-type: none"> • Ensure the current prison equalities monitoring tool is maintained and updated effectively. Work will be carried out to investigate methods to improve the timeliness of the equalities monitoring tool and the potential for further metrics relating to activities, rehabilitative work and release planning to be added. • The data will be routinely reviewed in each establishment and discussed at the monthly D&I meetings, so appropriate actions can be taken where necessary. • Data will be shared routinely with probation colleagues to consider issues of bias in key joint decision making, to include Release on Temporary Licence, Home Detention Curfew, early release and parole. • Datasets will be shared and discussed routinely with prisoners and agencies working in establishments, so that appropriate timebound actions can be implemented to address any disparities. 	<p>Deputy Director Prison and Probation Operational Analysis</p> <p>Chief Operating Officer Prisons</p> <p>Chief Operating Officer Prisons and Chief Probation Officer</p> <p>Chief Operating Officer Prisons</p>	<p>July 2021</p> <p>June 2021</p> <p>June 2021</p> <p>June 2021</p>
3.	The leadership team in each establishment should develop an understanding of rehabilitative culture which is based on dialogue with different prisoner groups. The spirit and practice of rehabilitative culture should be developed around a consensus of what that concept means to the prison community in that establishment. It should frequently be discussed and	Agreed	<p>To ensure each establishment has, and to develop an understanding of rehabilitative culture, they will:</p> <ul style="list-style-type: none"> • All establishments were tasked with developing Rehabilitative Culture Strategies and engaging with staff and residents utilising a “Culture Web “exercise which is establishment specific. Where the culture web exercise was not carried out engagement with staff and prisoners took place. • Establishments will review their Rehabilitative Culture strategies on an annual basis, taking account of population changes and the latest population segmentation data. • Establishments continue to engage with their prisoners through Prisoner Councils, Prisoner representatives and in 	Executive Director Public Sector Prisons North, and Rehabilitation Lead	Complete and ongoing

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	reviewed with prisoners to ensure relevance.		<p>some cases, prisoner focus groups. Rehabilitative culture will be a topic explored through these forums.</p> <ul style="list-style-type: none"> Rehabilitative Culture leads have been identified in each prison group, who continue to meet with national leads to exchange best practice and report back to establishments, provide support and guidance to establishments, and drive the Rehabilitative Culture agenda. 		
4.	<p>Creative efforts should be made to better understand the distinct perspectives of BME and GRT prisoners on rehabilitation and release planning, supported by suitable specialist community groups as needed. The diverse experiences of different minority groups should be recognised in these efforts. Such work should include regular prisoner meetings that promote dialogue, discussion and mutual understanding between staff and the wider group of prisoners, in addition to smaller 'consultation' groups attended by representatives.</p>	Agreed	<p>To allow HMPPS to gain a better understanding of the distinct perspectives of BME and GRT prisoners so that we can deliver appropriate services, we will:</p> <ul style="list-style-type: none"> Continue to identify national and regional expertise and third sector organisations to support delivery, learning from the notable positive practice identified in the report. Establishments will host quarterly forums or meetings with prisoners and stakeholder leads to learn from the diverse experiences of different minority groups, to ensure that requirements are being met, and that they are still relevant. The findings of this report will be considered in the HMPPS RAP, a gap analysis will be completed to consider whether additional areas of focus are required. A workstream will develop access to and support for BME led specialist services, and to prioritise organisations that can meet the specific needs for different groups of prisoners based on their ethnic and cultural background. Funds from a BME led Voluntary Sector (VS) Development and Stewardship fund have been allocated to Probation regions, with learning gained from this initiative being shared with custodial teams to commission services locally: <ul style="list-style-type: none"> i) to support regional understanding of both the local communities and the BME Voluntary Sector (VS) offer and ii) to better prepare VS organisations to compete to offer specialist interventions and support to BME/GRT service users via the Dynamic 	<p>Rehabilitation and Care Services Group</p> <p>Chief Operating Officer Prisons</p> <p>Deputy Director, Strategic Development Group</p> <p>Rehabilitation and Care Services Group</p>	<p>Ongoing</p> <p>June 2021</p> <p>June 2021</p> <p>Completed and ongoing</p>

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			<p>Framework (DF). Equality issues are built into the DF specifications, providers are asked to say how they will support minority groups in their bids when commissioning services.</p> <ul style="list-style-type: none"> RPD's equality plans will ensure a proportionate representation of service users are engaged when undertaking a review of commissioning services under the DF. 	Chief Probation Officer	June 2021
5.	<p>HMPs should support the development of culturally sensitive services for minority ethnic prisoners, which are designed to meet their specific needs and recognise the importance of identity. The potential contributions of suitable specialist community organisations should be explored as part of this endeavour.</p>	Agreed	<p>To support the development of culturally sensitive services HMPs will:</p> <ul style="list-style-type: none"> As mentioned in recommendation 4, HMPs will undertake an exercise to identify national and regional expertise and third sector organisations to support delivery and development of culturally sensitive services, learning from the notable positive practice identified in the report. Interventions services will review (as part of the Accredited Programmes Strategic Review) the current suite of offending behaviour programmes, to determine if there is a requirement to deliver BME specific treatment programmes or further develop the existing suite to address any gaps, to ensure that provisions are culturally aware, sensitive and inclusive. Facilitators selection, training and continuous professional development should promote delivery of cultural awareness and sensitivity. Establishments will continue to hold prisoner engagement groups with minority ethnic group prisoners, to identify their needs and look to commission appropriate services thereafter. The RAP will develop tools to support staff to hold prisoner engagement groups with minority ethnic prisoners, to provide safe spaces to identify their needs, and to commission appropriate services thereafter where possible. For Public Sector Prisons, Keyworkers and POM's will attend additional training as part of their annual 6 hours of 	<p>Rehabilitation and Care Services Group/Deputy Director, Strategic Development Group</p> <p>Deputy Director, Interventions and Operational</p> <p>Chief Operating Officer Prisons</p> <p>Deputy Director, Strategic Development Group</p> <p>Executive Directors Public Sector Prisons</p>	<p>August 2021</p> <p>August 2021</p> <p>Completed and ongoing</p> <p>August 2021</p> <p>Ongoing</p>

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			<p>learning and development allocated for their roles as agreed by their line managers. This is to support engaging prisoners through their sentence plans and to support rehabilitation-focused work with BME and GRT prisoners and encourage them to attend and complete any necessary intervention.</p> <ul style="list-style-type: none"> The DF will be accessed by probation providers to commission services (where regionally or locally available) pre-release to have a more joined-up approach, as and when required. 	<p>North and South, LTHSE and Wales</p> <p>Probation Equality Lead</p>	<p>August 2021</p>
6.	<p>HMPPS should ensure that GRT prisoners are accurately identified so that they can be provided with culturally appropriate support and services. The contribution of GRT prisoner representatives and specialist organisation to achieving accurate identification and providing culturally appropriate services should be explored. The distinct groups covered by the collective term 'GRT', including those with Roma heritage, should be distinguished in prison data and in prison policy as required.</p>	Agreed	<p>To ensure HMPPS accurately identifies all GRT prisoners so that accurate data can be analysed and included in prison policy, so that culturally appropriate services can be provided, we will:</p> <ul style="list-style-type: none"> As part of the new 'receive a prisoner record' work that is about to commence, we will look to separately identify prisoners within the Gypsy, Roma and Traveller cohort. Ensuring the requirement is developed in collaboration with HMPPS, to effectively capture and incorporate all necessary ethnicity data. Ensure that all reception/induction paperwork and subsequent interviews allow for any prisoner who may be from the GRT cohort, the opportunity to disclose their true cultural identify. Where disclosed later, the correct entity will be changed on our systems to reflect this. Wherever possible, establishments will encourage GRT prisoners to become Peer Mentors, and involve them in as many different roles as possible, to offer effective support and to encourage identity where not disclosed to this cohort of prisoners. HMPPS will continue to work with Clinks with their Directory of Offender Services - an online database listing over 900 voluntary and community organisations working with offenders and their families, searchable by geographic region, prison, field of work, beneficiary group. 	<p>Deputy Director Digital Prison Services MOJ Digital & Technology</p> <p>Chief Operating Officer Prisons</p> <p>Chief Operating Officer Prisons</p> <p>Rehabilitation and Care Services Group</p>	<p>December 2021</p> <p>May 2021</p> <p>May 2021</p> <p>Ongoing</p>

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			<ul style="list-style-type: none"> • HMPPS will continue to work with BME specific organisations funded by ringfenced grant funding, intended to specifically support people with protected characteristics. • Establishments will hold regular GRT forums and promote cultural awareness through prison wide events to build trust and confidence, Additionally, they will engage with community groups to build communication channels, to build a greater understanding of their needs. • Ensure establishments are analysing data for GRT, so they are not disproportionately affected in any way, and that local Equality Action Plans incorporate the latest relevant equality recommendations/ findings. • Engage with third sector groups who liaise with families and have built up good relationships, to identify their perspective of the issues faced by their family members being in prison, and take advice from them on how we can improve communications and increase their trust. 	Rehabilitation and Care Services Group Chief Operating Officer Prisons Chief Operating Officer Prisons Rehabilitation and Care Services Group	Ongoing June 2021 August 2021 Ongoing
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Recommendations	
Agreed	6
Partly Agreed	0
Not Agreed	0
Total	6

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