

# A response to:

# Jennifer Rademaker's HMPPS Professional Standards & Behaviour Review – bullying, harassment & discrimination

6 May 2025

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## Introduction

The first step in addressing any problem is to accept that there is one. For too long, there has been a problem with bullying, harassment, discrimination and victimisation (BHDV) in His Majesty's Prison and Probation Service. That is a hard truth – but one we must confront head on.

We are committed to making meaningful, lasting change. That means thinking and acting differently, and fostering a culture rooted in respect, fairness and professionalism.

The people who work in HMPPS do incredibly difficult, demanding, and often dangerous jobs, in the most stressful and pressurised environment. And they do it because they believe in public service – in protecting communities, and helping offenders turn their backs on crime. No one signs up to be bullied or harassed by their own colleagues. And yet, that is the reality for too many staff in the Service today.

There is a real human cost to this. It drives away good people – the kind of staff we want to keep in the Service. But critically, it makes it much harder for staff to do their jobs – the vital work that cuts crime, protects the public, and makes our streets safer.

That's why professional standards matter. Our values must not just be words on paper. They must be reflected in how we treat each other, every day. And where those standards are not met, it is essential that staff, and the public, know that we will take swift and decisive action.

The findings of the Rademaker Review are deeply sobering. They show that unacceptable behaviour – language, attitudes, and actions – have sometimes been normalised, tolerated and accepted over time. And that too many staff feel unable to speak out, fearing they won't be taken seriously, that it will only make matters worse, and that the hierarchy above them will close ranks. That must change.

This doesn't align with the culture of professionalism, respect and fairness that HMPPS wants to foster in its workforce. We want every member of staff, at every level, to have confidence that if they raise a concern, it will be heard and acted on.

Jennifer Rademaker's report marks a pivotal moment. It makes clear that more must be done to uphold the high professional standards our vital work demands. It challenges us to do better – with practical recommendations to support and build on the work we are already doing to tackle these issues.

That is why, in response to Ms Rademaker's first recommendation, we will create an independent central unit to receive and handle all staff complaints of BHDV. This is a major shift. It takes complaints away from the line management chain, and gives them to a wholly impartial, dedicated team of experts to investigate. The unit will be overseen by an Independent Commissioner, ensuring there is both accountability and progress, as we reform how bullying, harassment and discrimination are dealt with across the Service.

These changes reflect our clear intent: to uphold the highest professional standards across HMPPS, respond robustly when behaviour falls short, restore the trust of our staff. They send an unequivocal message – that bullying, harassment and discrimination have no place in HMPPS.

We are grateful to Jennifer Rademaker for her thoughtful and constructive Review, and for her continued support in holding HMPPS to account for delivery of her recommendations.

We also extend our sincere thanks to members of staff, staff networks and recognised trade union officials who spoke with Ms Rademaker, particularly those who bravely shared their experiences of unprofessional behaviour. Your voices are driving this change.

**We accept all 12 of the report's recommendations.** Work is already underway to take them forward, alongside wider work to uphold and maintain professional standards. This document sets out how we will do that – and how we will continue to build the culture our staff, and the public, deserve.

Phil Copple Chief Executive Officer, HMPPS Louise Alexander MoJ People Director, HMPPS & Business Partnering

May 2025

# Professional Standards – setting and upholding standards

#### Our Approach

The necessity and importance of professional standards is woven through every aspect of our work in HMPPS. The setting, upholding and maintaining of those standards is drawn into two overarching approaches:

#### **Proactive/Preventative**

Evidence-based approaches to positively drive culture change and maintain professional standards. This includes activity to assess local workplace climates, supporting leaders in building better workplace cultures.

Processes, systems and activity to prevent unprofessional behaviour and reduce the threat. This includes vetting, corruption prevention, learning and development, detection, intelligence and data analysis.

#### **Reactive/Responsive**

Processes and systems to enable conflict resolution, safe reporting of unprofessional behaviour, support for complainants, and fair and timely decisions.

While the Rademaker report focuses on bullying, harassment, discrimination and victimisation, this response also sets out the work we are doing across the full spectrum of professional standards activity.

#### Professional Standards and Behaviour Group

The **HMPPS Professional Standards and Behaviour (PSB) Group** was established in April 2024 and provides a vital function to ensure HMPPS has the capability to address and prevent failings in professional standards, ensure that staff are treated fairly and equally, and take forward the recommendations of the Rademaker Review. The Group works closely with operational leaders across Youth Custody Service, Prisons, Probation and Headquarters.

Recent work includes the launch of National Inclusion Priorities including reducing racial disparity in use of force in prisons and work to better support staff with disabilities and improving ethnic minority representation across the Agency. We are also working to establish a Professional Standards External Advisory Board. This group of expert individuals from outside HMPPS will work in partnership with HMPPS, providing challenge and assurance in respect of products, policies and practices relating to professional standards and behaviour.

We established the Tackling Unacceptable Behaviour Unit (TUBU) in 2020, adopting and adapting a model in place in the Army. Since then, HMPPS has been able to provide support to staff experiencing or witnessing unacceptable behaviour through its confidential staff helpline and mediation service. Demand for these services has increased each year with 2023/24 seeing a 37% increase in helpline calls and a 44% increase in referrals for mediation on the previous reporting year<sup>1</sup>. The volume of helpline calls and mediation referrals continued to increase in 2024/25 with a further 23% increase in helpline calls and 5% increase in mediation referrals.<sup>2</sup>.

TUBU's investigation service launched in December 2023, providing qualified investigators who focus on BHDV and can lead or assist investigations in line with the relevant policies, bringing expertise and insight into these sensitive and often complex cases.<sup>3</sup>

In February 2024, TUBU recruited seven Mediator and Conflict Resolution Managers, each holding formal accreditation in workplace mediation. The TUBU Mediation service has now been able to expand its offer beyond mediation between two parties, to include group mediation and facilitated conversations, strengthening our overall approach towards early resolution.

The PSB Group also provides **frontline support and practical interventions** to improve professional standards. As well as the responsive/reactive aspects of its work set out above, the TUBU carries out **climate assessments** to put colleagues' voices at the centre of our work, to understand how unacceptable behaviour presents itself, barriers to reporting and areas for improvement. A new team, providing Behaviour Intervention and Practical Support (BIPS) is already delivering support in several prisons and probation delivery units. In the future, this team will play an expanded role, providing senior leaders in each Area with expertise and resource to respond to issues identified by Climate Assessments. Work continues in supporting and empowering local leaders and staffing groups (including local representatives of recognised Trades Unions) to deliver tangible change together.

In October 2024, we launched a new **Professional Standards and Behaviour Guide**, setting out the expected standards of behaviour for all staff working within HMPPS. The aim of this guide is to help create a positive, professional, and supportive work environment where everyone understands the professional standards and behaviour expected of them, so that staff feel safe and respected within the workplace.

In addition, as well as the response to the report's recommendation 4, HMPPS is continuing its work to address and prevent **sexual harm** in all its forms, including where sexually harmful behaviour is displayed by prisoners or people on probation. Work already delivered and continuing to be developed includes peer support, including that offered by our Female Support Network in Prisons. We have also improved policy and practice through the introduction of three new Adjudications to address Sexual Harassment, Sexual Assault and Exposure and any Obscene or Indecent Behaviour by prisoners. From April 2025, we will increase our resource to

<sup>&</sup>lt;sup>1</sup> HMPPS Annual Report and Accounts 2023 to 24 - GOV.UK

<sup>&</sup>lt;sup>2</sup> 2024-2025 TUBU data will be published in more detail in the 2024 to 25 HMPPS Annual Report and Accounts in due course.

<sup>&</sup>lt;sup>3</sup> Current policy requires that, in prisons, investigations in which operational members of staff are the respondent must be led by operational members of staff at least one grade more senior.

address sexual harm and our HMPPS Disparities Unit will throughout the coming months develop our strategy for this area, including the Agency's ongoing response to the implementation of the Workers Protection Act. We will continue to upskill our managers and staff to ensure they have a clear understanding of our obligations under the Act.

### Bullying, Harassment, Discrimination & Victimisation (BHDV) – response to the recommendations

The Rademaker report reflects the progress we have already made, recognising that many HMPPS leaders at all levels are driving meaningful change and that the work of the Tackling Unacceptable Behaviours Unit (TUBU) provides a visible focal point and mechanism for driving progress. The 12 recommendations provide HMPPS with practical steps to build on the progress we have made. We accept all 12 recommendations and some work to implement them is already underway.

## Recommendation 1 - Changes to the system for resolving BHDV complaints

The Rademaker report states "HMPPS needs a different system for resolving BHDV complaints, a system oriented towards the fundamental principle of independence in investigations and decision-making processes, geared for effectiveness in an operational environment." The main recommendation in this respect (Recommendation 1) is that:

#### HMPPS should move to establish an independent channel outside of the line management structure for reporting, investigating and decisioning BHD complaints where a dedicated team of well-trained personnel / experts can handle matters in a ring-fenced, confidential, and standardized process.

Along with MoJ People & Capability, we have considered how best to establish such a channel, including continuing to learn from other similar operational public sector organisations, such as the Police, Armed Forces and Fire & Rescue Services, building on the work of TUBU.

In response to this recommendation, a new central unit will be established where BHDV complaints will be received and handled. This represents a fundamental shift from how BHDV complaints are currently handled within HMPPS. This will be a joint unit of suitably qualified and experienced HMPPS staff, working with MoJ HR Professionals, where members of staff can report BHDV directly. The central unit will sit outside of the operational line management structure. Reports of BHDV will be considered by a dedicated team of appropriately qualified experts outside of the line management chain, who would be responsible for deciding the appropriate handling route, with the most serious and complex allegations decided by the central unit. Working with our recognised Trades Unions and colleagues we will develop the detailed model, including routes of triage, resolution, investigation and decision-making. The precise details of how the team will operate will be worked through in consultation with our recognised Trades Unions and through engagement with key stakeholders (including Staff Networks) across HMPPS and MoJ. This will include the need to consult with recognised Trades Unions on proposals to make the relevant necessary changes to HR policies, alongside strengthening our assurance mechanisms, through a coherent approach to monitoring and reporting on casework, together with insight and intelligence on professional standards.

In addition, the role of **Independent Commissioner for HMPPS Professional Standards** will be established, to provide independent and impartial oversight of the new central unit, to review whether the reforms to the handling of BHDV complaints provide a system that is efficient, effective and fair and to report publicly each year on their findings and to make recommendations for further improvement as necessary. Further details on the role will be announced when the role is advertised under the Public Appointments procedures.

#### Recommendations 2 – 12

Our response to all 12 recommendations can be found in the table at the end of this report at pages 11-19. These cover a wide range of themes including how we implement workplace adjustments, performance management, guidance and support for sexual harm/assault; and metrics to measure the impact of what we're doing. To support the implementation of the recommendations, we are also looking at how we learn organisationally from employment tribunal outcomes and make better use of early resolution to address staff complaints.

Collectively, implementing the recommendations will build on the work done so far to improve professional standards, leading to an HMPPS culture that allows everyone to thrive. Significant preparatory work is already underway for many of the recommendations. We will work with colleagues across HMPPS, Staff Networks and the recognised Trades Unions to further develop our response.

#### Ongoing oversight role for Jennifer Rademaker

Ms Rademaker will continue to provide HMPPS with objective scrutiny by providing oversight and challenge over how we progress with implementing her 12 recommendations.

# Wider approach to Professional Standards

As noted above, our work on professional standards goes beyond BHDV and the Rademaker recommendations. Detailed below are other vital aspects.

#### Corruption

HMPPS defines corruption as a person in a position of authority or trust, who abuses their position for benefit or gain for themselves, or for another person. In prison and probation services, this would include the misuse of a person's role to plan or commit a criminal act, or a deliberate failure to act to prevent criminal behaviour.

HMPPS has a clear strategy for tackling corruption. The ambition is to create an organisation resilient to corruption through four strategic approaches:

- **PURSUE** and punish those involved in corruption through disciplinary and criminal justice outcomes.
- **PREVENT** staff from engaging in corruption by recruiting a resilient workforce, strengthening capability and professional integrity and managing corruption risks.
- **PROTECT** against corruption by understanding threats, having robust policies, processes and procedures in place and holding ourselves to account.
- **PREPARE** for the consequences of corrupt behaviour and support teams where corruption has occurred.

The Counter Corruption Unit (CCU) plays a key role in supporting staff, managers and leaders to tackle corruption throughout the organisation. It is responsible for HMPPS' counter corruption policy and procedures, leading on the development of counter corruption capability, raising awareness on the threat of corruption, preventing corruption and supporting the organisation to pursue corruption wherever it takes place.

HMPPS has invested more resources in counter corruption efforts over recent years, and our CCU stands at the centre of activity that is of a much greater scale and sophistication and with greater collaboration with our policing partners than was historically the case. The expanded counter corruption offer across both custody and probation was reflected in the introduction 4 years ago of a new Corruption Prevent strategy.

The two core aims of the Prevent strategy are to prevent staff from engaging in corruption through early intervention and support, and to prevent identified corruptors from corrupting staff. Products include:

- Initial Training for Prison Officers and Operational Support Grades
- Counter-Corruption (Prevent) Establishment Awareness Packages

- Resilience and Support Meetings (RSMs)
- Counter Corruption Induction Leaflet
- Site Support and Engagement
- Resilience Toolkit for Line Managers
- Refreshed Poster Campaigns
- Active Corruptor Management

The expanded Counter Corruption **Pursue** offer included the deployment of onsite and regional staff to manage active corruption cases on behalf of prisons and probation delivery units. This generally starts from receiving and processing confidential reporting to developing this through to investigations and outcomes. Where a criminal offence has occurred, HMPPS works routinely with law enforcement to seek a proportionate disciplinary and / or criminal justice outcome.

HMPPS has strong partnerships with Policing and the National Crime Agency. HMPPS currently funds 20 dedicated Police Investigators, working within the nine Regional Organised Crime Units and the Metropolitan Police, that directly support criminal investigations and prosecutions of HMPPS staff. We also work routinely with all 43 Police Forces on corruption cases.

The **Protect** and **Prepare** strategies have focussed on the creation of an effective performance framework and evidence base, to ensure HMPPS has an understanding of the drivers to corruption and an effective way to measure success.

#### Vetting

Security vetting is vital in HMPPS to ensure individuals can uphold the security and integrity standards expected of their role and ensure that prisons and probation remain safe for rehabilitation to take place. HMPPS Personnel Security Countermeasures are continuously working to strengthen the security vetting process to ensure our checks identify and mitigate new and emerging risks where possible

In recent months HMPPS have introduced online digital vetting checks to enhance our capability to prevent people from entering or operating within our organisation who are intent or likely to cause harm. This may include people who are:

- linked to or celebrate criminality;
- not aligned to our corporate values in the behaviour they demonstrate (e.g. racism, misogyny, homophobia) therefore risk undermining the work and reputation of HMPPS if working for us;
- displaying vulnerabilities that we are unable to adequately mitigate that are assessed as leaving them and/or the organisation at risk from coercion/corruption/infiltration;
- not displaying expected level of integrity by failing to disclose and/or conceal relevant and required information; and
- likely to cause reputational damage or damage public confidence in HMPPS.

The shift towards the use of online checks is reflective of the changing landscape around vetting. HMPPS is leading the way in the digital vetting field with other comparable organisations now introducing online checks as part of their vetting processes. The implementation of a revised vetting questionnaire for applicants will be another step towards further enhancing our security regime and ensuring that we continue to uphold our duty in maintaining the safety, security, and reputation of HMPPS and the people within it.

#### Learning & Development / Training

#### Probation

HMPPS recognises that a good learning and development offer is critical. The work of the Probation Service is demanding, requiring specialist skills and knowledge that takes time to develop and refine. Taking a person-centred approach to work and investing in good relational practice skills makes a difference; between practitioners and those they work with, between colleagues and between line managers and those they manage. It is through reflecting on work undertaken and consolidating learning into practice that individuals are enabled to thrive.

We have introduced an internal probation professional register, to provide assurance that those individuals authorised to assess and manage the risk of people on probation have the right qualifications, knowledge and skills to do so, with requirements becoming mandatory for staff working in roles requiring a probation officer qualification from 30 September 2024. Underpinning registration are six probation professional registration standards, developed to align with the broader HMPPS Professional Standards that outline the approach, values, beliefs and ethics that govern work as a probation professional, regardless of grade or role, and how this is reflected into practice. These standards are being embedded into learning, from the initial qualifications to continuing professional development packages.

#### Prisons

HMPPS recognises that our frontline staff are at the centre of the prison system, and that having sufficient and skilled staff is fundamental to delivering safe, secure and rehabilitative prison regimes. We continuously review our workforce offer and make continuous improvements to the systems that surround and support our frontline prison staff.

The Enable Programme is a dedicated HMPPS workforce transformation programme. It aims to transform prisons over the medium term, through a series of workforce and regime changes that will change how HMPPS trains, develops, leads, and supports prison staff to ensure that they feel safe, supported, valued, and confident in their skills and their ability to make a difference. This will support the creation of conditions for change in prisons, including in relation to professional standards which forms a dedicated part of the learning and capability products being developed. The programme has recognised the need to develop specific Professional Standards learning packages for colleagues at levels, with a view to supporting knowledge, capability and confidence building. These include 'Professional Behaviours Matter' and 'Professional Standards Matter' for Officers and a 'Professionalisation' package for Middle Managers. The 'Introduction to Professional Standards' workshop for Senior Operational Leaders will equip Governors to confidently and consistently challenge and address unprofessional standards and behaviour at a local level.

## Next steps

As can be seen above and in relation to each of the 12 recommendations below, there are a number of short, medium and long term activities that HMPPS and MoJ will undertake. Working in partnership with key stakeholders, we will be undertaking engagement and consultation (with our recognised Trades Unions) activity to deliver the recommendations over the coming weeks and months.

We aim to improve staff trust and confidence in reporting BHDV complaints, and for these to be handled effectively and fairly in order that we can be assured we are taking a zero tolerance approach to BHDV and genuinely upholding our values. At the same time, we recognise that there is also value in enabling colleagues to resolve concerns quickly and satisfactorily. The new central team of qualified professionals will enable colleagues to raise concerns in a safe way, seeking opportunities for early resolution and intervention before matters escalate. Where allegations of misconduct are made, colleagues across the Service will know that they can report these to a specialist unit, outside of the line management chain, who will be responsible for deciding how these allegations will be handled.

Through better use of data insights and metrics, we will focus our work on the parts of HMPPS that need it the most, being alert to new and emerging issues, and tackling them as they arise.

We anticipate that an early indication of improved confidence in reporting BHDV will be an increase in such reports. Alongside this, we will monitor formal feedback, such as the Civil Service People Survey results and our internal Climate Assessments, to measure impact of the changes in people's confidence and satisfaction that appropriate action is taken when a report is made.

We will see strengthened vetting, so that we can be sure we have the right people working for us, whose values reflect our own. Improved data handling will enable us to better link datasets and intelligence between Professional Standards & Behaviours Group and Counter Corruption Unit, feeding into Vetting.

Alongside these procedural issues, the intelligence and insights from this work will enhance the work of the wider PSB Group, providing practical interventions and support to drive positive culture change.

Rec	commendation	Commentary	Timeline
1	HMPPS should move to establish an independent channel outside of the line management structure for reporting, investigating and decisioning BHD complaints where a dedicated team of well- trained personnel / experts can handle matters in a ring-fenced, confidential, and standardized process.	Agreed – A new central unit of well-trained personnel/experts will be established where BHDV complaints will be received outside of the line management structure. Working with our recognised Trades Unions and colleagues we will develop the detailed model, including routes of triage, resolution, investigation and decision- making. In addition to this central unit, the role of Independent Commissioner for HMPPS Professional Standards will be established, to provide independent oversight of the operations of the new central unit, reporting publicly each year on the operations of the unit and application of the policies.	Initial engagement with recognised Trades Unions (who have met with Jennifer Rademaker as part of the review) has commenced. This will progress to consultation and early discussion on how the unit will operate, how this impacts on existing HR policy and what will need to change. Independent channel to be launched in full by January 2026.
		As part of the process of developing this reform, we will engage with senior leaders, staff and Staff Networks to understand their views and perspectives. We will alongside this, consult with our recognised Trades Unions with a view to reaching agreement on necessary policies changes where at all possible. Where possible, we will implement changes quickly to prove the concept and help inform appropriate policy changes.	

2	The forthcoming review of the DIRF process being undertaken as part of the HMPPS response to the HMIP thematic review should include assessing rigour in data capture and reporting, timeliness of response, and consistent and independent handling of DIRFs. I also recommend assessing the process through the separate lenses of staff, prisoner and visitor as complainant to fully account for differences in context and power dynamics.	Agreed - HMPPS recognises the importance of cultivating an inclusive culture within our prisons. While we are striving towards this goal, the December 2022 HM Inspectorate of Prisons Thematic Report into the Experiences of Adult Black Male Prisoners and Black Staff highlighted shortcomings in our current discrimination complaints system and the way data is used to improve organisational understanding and outcomes for prisoners and staff. HMPPS has undertaken a review on improving understanding and confidence levels of the DIRF (Discrimination Incident Reporting From) process. The review has considered the matters set out in this recommendation, including researching the current process within prisons to identify current issues.	Delivery of the recommendations from DIRF review has commenced. The new DIRF governance structure will be in place from June 2025. We will appoint an external partner to work with us on the new training delivery model by July 2025
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3	HMPPS should review the process for handling workplace adjustments, including addressing inconsistencies in the application of managerial discretion, the appropriateness of disregarding recommendations from Occupational Health and the Workplace Adjustment team, and providing more confidential channels for the assessment of medical information and communication of adjustments.	Agreed - The MoJ Workplace Adjustment Service offer was reviewed as part of a three-year review cycle in autumn 2024. The role of line managers in responding appropriately to requests for reasonable adjustments formed part of the review. The review included identifying roles and responsibilities for line managers and business areas within the process, whilst also making it easier for employees to seek the support they need.	Implementation of the new workplace adjustment service offer to be rolled out across the department from the end of May 2025. All service users will be surveyed on their experience, which will be reviewed every six months. Strategic risks will be identified on a monthly basis to ensure a consistent approach with regards to workplace adjustments across HMPPS and MoJ.
4	In the process of finalizing the working draft of the Sexual Harassment Guidance, HMPPS should consider including information on sexual assault and rape, as well as addressing the provision of pastoral care to the victim. The specific considerations around sexual harassment and assault should ordinarily trigger an investigation without the need for a grievance to be raised.	Agreed – The new Sexual Harassment and Sexual Assault Guidance has been drafted and includes information on sexual assault and rape, and the support available to victims. It is under consultation with Trades Unions. Complaints of sexual harassment and assault will be considered by the new joint unit established to handle BHDV complaints, under recommendation one.	The guidance will be communicated once agreed with TUs. Independent reporting and investigating of sexual harassment and harm will be implemented in full by January 2026, in line with recommendation one.

5	In finalizing policy and procedure revisions, my input should be considered before the policies are subject to consultation and final sign-off	<b>Agreed</b> - We will continue to use the insights from this work to inform the development of the relevant key policies and procedures. We will also seek Ms Rademaker's input at key points during the process of relevant policy reviews, in line with her ongoing oversight role.	Ongoing
6 and 9	HMPPS should consolidate formal complaints into one database and regular reporting to senior leadership and key stakeholders should occur, including monitoring of KPIs related to employee experience and policy guidelines.	<b>Agreed</b> – We will publish BHDV metrics and outcomes in a way that protects individuals' right to confidentiality but meets the aim of improving confidence in reporting and ensuring clarity of expectations of professional standards and the potential consequences of misconduct.	Initial iteration of regular reporting to be shared with senior leaders by June 2025, followed by wider engagement. We will engage with and consult Trade Unions as part of this engagement.
	HMPPS should consider reporting metrics on BHD matters and outcomes on a regular basis to all employees. Due to sensitivity, specific care should be taken to ensure anonymity of any cases reported.		High level metrics and outcomes to be published by October 2025.

7	TUBU should review the	Agreed - TUBU has reviewed the objective and	Initial review completed.
	objectives and approach to	approach to Climate Assessments as recommended	New model of Climate
	Climate Assessments to	and a new streamlined approach, commenced in	Assessments has been
	determine opportunities to	October 2024, enabling faster delivery of reports	delivered since October
	improve impact, streamline	with a clear focus on the key issues and areas of	2024.
	output, and build credibility with	improvement.	
	staff.		BIPS services, supporting
		We continue to provide summary reports to local senior leaders following the completion of Climate Assessments to help their engagement with staff. This enables local leaders and staff to work together to address the issues identified, with a view to finding solutions.	leaders to bring about culture change, were being delivered in 2024/25 and were fully launched in April 2025.
		A new team, providing Behavioural Interventions and Practical Support (BIPS) is already delivering support in several prisons and probation delivery units. In the future, this team will play an expanded role, providing senior leaders in each Area with expertise and resource to respond to issues identified by Climate Assessments. Work continues in supporting and empowering local leaders and staffing groups (including local representatives of recognised Trades Unions) to deliver tangible change together.	We will work with Senior Leaders, colleagues, Trades Unions and other key partners to continue to learn and improve the Climate Assessment process and how the centre can support the frontline in driving positive change.

8	Continued care should be taken in hiring TUBU mediators and investigators with personal and professional profiles that reflect neutrality and independence.	Agreed - As with all HMPPS recruitment, appointments to the posts of TUBU Senior Investigator or TUBU Mediator and Conflict Resolution Manager are subject to the relevant recruitment policies and fair and open competition. Candidates are assessed against the required Civil Service behaviours and professional qualifications for the roles.	Completed. Internal TUBU guidance was published on the intranet in October 2024.
		We take conflict of interest issues seriously. We have prioritised publishing our approach regarding assignment of cases to TUBU investigators or mediators to ensure independence in line with existing HR policies, including guidance to parties on how they can raise concerns if they are concerned about a conflict.	

10	HMPPS should publicly celebrate and showcase leaders who are driving meaningful change, including communicating the successful measures they deployed.	<b>Agreed</b> - HMPPS has developed an internal communications strategy on Professional Standards and pride in service. This important aspect is included in our strategy, both to recognise the excellent work being undertaken across the organisation and to share good practice and successful approaches to positive change.	Ongoing, commenced in May 2024
		This has included the recent launch of Communications Toolkit to support the implementation of the Professional Standards Guide. This toolkit supports local leaders to have meaningful conversations with staff about expected standards and conduct. We will monitor the use of the toolkit and seek opportunities to celebrate those who have used it effectively.	
		An additional strand of our communications strategy focuses on the HMPPS Senior Champions. The senior champions' work covers all protected characteristics as well as other priority areas such as social mobility, wellbeing, and carers. Champions, in collaboration with Professional Standards Group and Staff Networks, are responsible for driving positive actions in their priority areas to improve outcomes across HMPPS. We have established regular communications to profile the successes and progress of the Champions and will continue to use this channel to showcase leaders who are driving meaningful change.	

11	HMPPS should assess the current approach to performance feedback, considering whether it is effective across all branches and where there are opportunities to improve on it to better support communicating, documenting and reinforcing expectations on professional standards behaviour.	Agreed - HMPPS and MoJ People and Capability Group will review the content and quality of performance conversations, engaging with Trades Unions and gaining input from staff, to ensure they are embedded for staff and support high professional standards. As part of HMPPS's communications strategy on Professional Standards, we reinforced expectations of professional standards of behaviour, including publication of a guide in October 2024 which provides examples, together with signposting to relevant policies and sources of support. The guide also reminds managers of their responsibilities and provides links to resources such as the HMPPS Managers' Handbook.	Initial assessment of best practice and barriers to implementing quality performance conversations to be completed by May 2025, after which we will consider next steps to continue to improve performance feedback.
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12	HMPPS should assess whether current hiring practices enable sufficient assessment of a candidate's alignment with HMPPS values prior to hiring.	Agreed – A new 'values-based sifting' assessment was piloted in Probation, sifting out individuals whose values do not align with the organisational values and therefore promoting pro-social behaviours in new employees (anti-BHD). Consideration is now being given to integrating values-based sifting into prison recruitment.	Values Based Assessment pilot for Probation Officer recruitment successfully concluded in December 2024 and will continue to be used in future Probation Officer campaigns.
		In addition, volume hiring processes now include relevant Success Profile behaviours which promote collaboration and cohesion.	Consideration of implementing values-based sifting for other HMPPS recruitment, such as Prison Officer recruitment, underway. Feasibility will be decided by July 2025.



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