15. RACISM AND RELIGIOUS INTOLERANCE

Introduction

15.1 Since January 2004 there have been a number of organisational changes to the management of race relations at Prison Service Headquarters and these are detailed below.

15.2 There have been several reviews which considered the role of Diversity and Equality Group (DEG). Following the CRE's Formal Investigation it became apparent that it would be necessary to make further changes to DEG's structure and role. In June 2004 the Prison Service Management Board agreed a new structure: the Group was renamed as the Race and Equalities Action Group (REAG), and the Group's programme of projects was refocused around three main strands of work:

- Policy and Programmes;
- Delivery and Implementation; and
- Community Links.

15.3 The Policy and Programmes Team was formed to support and co-ordinate work on the implementation of the CRE/Prison Service Action Plan, implementation of the Race Relations (Amendment) Act 2000 (RR (A) A, and development of the Prison Service Race Equality Scheme, by providing guidance to policy and operational groups on the general and specific duties (National Offender Management Services was not factored in at this stage). It would be responsible for maintaining and developing policy on race and other equal opportunities subjects, providing Headquarters and establishments with guidance on legislative requirements. It would provide a central co-ordination point for feedback to and from the Delivery and Community Links Teams.

15.4 A Delivery Team was formed to assist establishments and area offices with the implementation of the CRE/Prison Service Action Plan; address the failure areas identified by the CRE during their Formal Investigation; contribute to policy development in the light of operational realities; assist in the implementation of a revised suite of Key Performance Targets and other
monitoring requirements; and manage a help desk to assist establishments and others. The Delivery Team is a multi-skilled team made up of staff from Headquarters and operational staff on secondment.

15.5 The Community Links Team (led by someone from the voluntary or community sector, either on secondment or through advertisement) would work with communities (voluntary, business, local government, faith groups and Race Equality Councils etc) to help establishments fulfil their duties under the RR (A) A; improve the involvement of external community groups on Race Relations Management Teams; and ensure good communication links are developed and maintained with the Prison Service policy and operational groups. This would also include external organisations that have an interest in BME prisoner linked community issues. This team would work closely with the Delivery Team to ensure there is an external, as well as internal, mechanism of support that is provided to establishments. It would also play a key role within, and support the work of, the Race Action Group under the Chair of the Race Equalities Advisor. The community links element of REAG’s work is still being developed.

Racism and religious tolerance on the part of prisoners

15.6 All new prison officers attend the Prison Officer Entry Level Training (POELT) course, which is made up of a number of various modules. There are two modules on diversity covered within the current POELT course. Additionally, students are provided with written materials, which they read in their own time, and which supplement classroom learning.

15.7 Module 13 of the POELT course concerns diversity and covers challenging unacceptable behaviour. In this section of the course, students discuss how to recognise and challenge unacceptable behaviour, and why it is important to do so. A student handout that addresses why, when and how unacceptable behaviour, remarks, jokes, and banter should be challenged is given to all students. Further handouts are distributed during POELT informing new officers about different cultures and religions. These issues are further discussed in classroom time as a group (see the attached prisoner officer training handout). For further information on training see Annex A (High Level Deliverables 10 and 11) and Annex B, recommendations 9, 10, 11 and 17.
15.8 Additionally, the handbook “Signs of Hate”, which was published by the anti-fascist and anti-racist organisation Searchlight, helps the Prison Service, Police, Court staff and others to recognise extremist insignia, tattoos, jewellery and clothing, as well as racist words, acronyms and organisations. The handbook was championed by the Prison Service as a valuable aid to improving safety and security in prisons. Safer Custody Group urged all prisons to use it as part of their violence reduction strategy and cell-sharing risk assessment process, and REAG purchased sufficient copies of the handbook to be distributed to all establishments. Material in the handbook has also been used in workshop training sessions for Race Relations Liaison Officers at a two-day annual conference (held in June 2004) for all Prison Service staff, involved in race and diversity. A copy of the handbook is attached [document 73].

15.9 Prisoners are able to make complaints in a variety of ways, including orally or through a third party. The formal Request/Complaint system or the racist incident report form are the two usual methods of reporting racist incidents. Both systems were significantly revised, following consultations and piloting of new procedures during 1999/2000.

15.10 Prison Service Instruction 45/2002 requires all establishments to use the revised Racist Incident Reporting Form for the recording of all racist incidents and the Standardised Log for the monitoring of the information, and to provide information available to area managers and others on the scope and scale of the incidents recorded (document 74).

15.11 For reporting purposes a racist incident is defined as any incident which is perceived to be racist by the victim or any other person. The Prison Service’s commitment to promoting race equality requires that all staff, uniformed or not, are proactive in addressing racist behaviour and need to be aware of the procedures for reporting racist incidents. If appropriate, a member of staff can complete the form on a victim or witness’ behalf. In the case of oral reports, letters etc. or of complaints alleged to contain a racist element, these are referred across by the Complaints clerk to the Race Relations Liaison Officer.
15.12 As with the prisoners' formal complaint system, there has been sufficient evidence to suggest that prisoners may have concerns about reporting incidents in the first place and about whether they would result in any action. In the case of racist incidents, it should make no difference whether reports are proved to be well-founded or not, whether they result from a misunderstanding or if they had already been resolved informally; all racist incidents must be reported to the Race Relations Liaison Officer and recorded on the Standardised Log.

15.13 Guidance on the reporting of racist incidents and the use of the Racist Incident Reporting Form was published in the form of a Prison Service Instruction (PSI) in September 2002. The purpose of the PSI was to improve:

a) The recording of racist incidents;

b) The response to individual reports, thus improving the confidence of victims in the system;

c) The monitoring of information by Race Relations Liaison Officers and Race Relations Management Teams; and

d) The information available to area managers.

15.14 The Standardised Log for recording racist incidents should be discussed and examined at each meeting of the Race Relations Management Team, and the log should be signed by the Chair to confirm this has taken place. Comprehensive guidance highlighting the definition of a racist incident and the use and availability of the revised Form was attached to the PSI. All staff have access to the PSI and accompanying guidance on the Prison Service Intranet (document 75).

15.15 There has been concern for some time that in some prisons racist incidents are not discussed or examined sufficiently at each meeting of the Race Relations Management Team. It is envisaged that the management of racist incidents will be further improved following the implementation of two new Key Performance Targets (KPTs) on prisoner and staff race relations in 2006/7 (the two KPTs were rolled out to all establishments on a shadow basis in April 2005). The management of the racist incident element of the KPT will ensure that every aspect of a complaint of a racial nature involving prisoners is thoroughly investigated within a specific time frame. An audit of the key
steps, which should be taken in investigating such complaints, will reflect an establishment’s success on this measure, and will account for 25% of the establishment’s total score on the Operational KPT for prisoners. To assist in managing the process, a Racist Incidents Log Database has been produced, which will replace the paper based Standardised Log, discussed above (further information about the new KPTs on race relations for prisoners and staff is provided below).

15.16 Although the Racist Incident Reporting Form can be used by anyone within a prison to report racist incidents or behaviour, prisoners currently use it as an alternative to the Request/Complaint form. However, some complaints from prisoners using the Request/Complaint system may contain a racist element. For completeness, the Race Relations Liaison Officer is made aware of these complaints and s/he will normally be informed by the Complaints clerk, for recording purposes. The current Complaints form includes a tick box for the prisoner to identify if s/he believes there to be a racial element.

15.17 Work to further improve prisoner confidence in the racist incident reporting system and the Request/Complaint system forms a part of our ongoing programme of work with the CRE. See Annex B, recommendations 1, 5 and 7.

Awareness of racial or religious issues

15.18 There is no formal guidance that deals specifically with a prisoner that may feel inhibited about mentioning that s/he does not wish to share a cell with a particular prisoner. The Inquiry has been sent the current training packages for Race Relations Liaison Officers, Race Relations Management Teams and the generic diversity training package for all staff. Training for Race Relations Liaison Officers and Management Teams is currently being piloted and revised. During this time consideration has been given to addressing this issue in the proposed revisions to both training packages, which include training on the following:

- The role of the Race Relations Liaison Officer and Race Relations Management Team;
- Awareness, beliefs, values, decision making;
• Legislative obligations and conducting impact assessments;
• Handling racist incidents and complaints;
• Conducting investigations;
• Searching and handling of religious objects;
• Interpreting ethnic monitoring data and the new race relations key performance targets.

15.19 Additionally, the Prison Service violence reduction strategy provides guidance to establishments on addressing racism and racially motivated violence. The violence reduction toolkit addresses this issue specifically; see over Cell-sharing risk assessment is an additional tool to assist in the early identification of racist behaviour.
<table>
<thead>
<tr>
<th>Racial violence/bullying categories of incidents</th>
<th>Options for reducing risk</th>
<th>Works best when</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Physical assault because of colour and/or ethnicity.</td>
<td>Clear and actively demonstrated processes for</td>
<td>The violence reduction strategy is related to the race equality action plan</td>
</tr>
<tr>
<td>• Derogatory name-calling, insults and racist jokes.</td>
<td>• Identifying the racist behaviour.</td>
<td>Collation of SIRS always covers a race angle</td>
</tr>
<tr>
<td>• Racist graffiti.</td>
<td>• Dealing with the perpetrator.</td>
<td>An institution is aware that racist incidents ranging from harassment and abuse to physical violence are offences under criminal law.</td>
</tr>
<tr>
<td>• Provocative behaviour such as wearing racist badges or insignia</td>
<td>• Supporting the victim.</td>
<td>It is not the presence or otherwise of black prisoners or staff that determines whether or not a comment is racist or offensive. In any discussion an offensive comment cannot go unchallenged</td>
</tr>
<tr>
<td></td>
<td>• Dealing with the impact of racist incidents in the whole establishment</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Cell sharing and other risk assessment processes to identify potential racists and take evasive action</td>
<td></td>
</tr>
</tbody>
</table>

BME prisoners and staff are involved in regular consultation about all prison issues.
15.20 In implementing the violence reduction strategy, racially motivated violence was a workshop topic on one of the development days. Standard 53, Violence Reduction, sets a baseline for the multi-disciplinary management team to be linked with other key areas e.g. suicide and self-harm prevention, diversity, drug & substance misuse, health and safety, child protection (Juvenile estate) MAPPA so that while a focus on violence reduction is maintained links are established with related issues.

15.21 Safer custody work has an important element of cross-reference between violence reduction (e.g. anti-bullying and cell-sharing risk assessments (PSI 26/2002), and suicide/self-harm prevention). Guidance and training make these links clear to staff, and the Assessment, Care in Custody and Teamwork (ACCT) PSI, which is attached, includes the instruction that case reviews must consider if there are disability needs or issues around bullying or harassment (including any problems in respect of race or homophobia) that need to be addressed to help the prisoner [document 75].

Response to the reporting of racist or intolerant incidents

15.22 There is no central mechanism for monitoring how effectively racist or intolerant incidents are responded to. It is for the Governing Governor of each establishment, through the Race Relations Management Team to ensure that racist incidents have been properly identified, recorded and reported. Centrally managed quarterly monitoring returns do however show that there are still a number of establishments that are not meeting the mandatory requirements of PSO2800. In particular, there is concern that not all Race Relation Liaison Officers are being informed of all incident/complaints of a racial nature. This concern has been brought to the attention of Area Managers and the message reinforced that it is important that all racist incidents/complaints are brought to the attention of the Race Relations Liaison Officer, not least so that proper records can be maintained and the incidents interrogated at the subsequent Race Relations Management meetings. In future, all racist incidents will be recorded on an electronic log, which is signed off by the Chair of the Race Relations Management Team each month, and by the Area Manager every six months. This should ensure that the correct processes are being followed. Where they are not, we would expect the Area Manager to identify this, take action and report to REAG, as
and when appropriate. REAG are considering the use of other monitoring and reporting mechanisms to identify those establishments that have not been able to bring racist incidents/complaints to the attention of the Race Relations Liaison Officer, and subsequently to the Race Relations Management Team.

15.23 Guidance and the use to be made under Prison Rules on racially aggravated offences was inserted into the Prison Service Discipline Manual on the four new offences that came into force on 1 August 2000 (document 76).

15.24 Race Relations Liaison Officers are not required to monitor the extent to which racist or intolerant incidents are properly identified. As stated above, for reporting purposes a racist incident is defined as any incident which is perceived to be racist by the victim or any other person. It is a mandatory requirement under PSO 2800 that all staff are familiar with the definition of a racist incident and that such incidents are reported to the Race Relations Liaison Officer. A variety of methods for disseminating the definition have been used by establishments, which also applies to guidance on how to report any such incidents. Governors’ orders, weekly bulletins, prisoner notice boards are frequent methods.

15.25 However, concern remains about the numbers of staff that have not yet received race and diversity training and the impact this may have on their ability to properly identify racist incidents. Work to further improve the delivery of training forms an important part of our ongoing programme of work with the CRE. For as long as real depth of experience in this area of work remains patchy within the Service, it is clearly important that all establishments make the best use of the trained staff they have (see the accompanying analysis of the fourth quarter race relations questionnaire: 1st January to 31st March 2005, in particular paragraph 9 (document 77). To this end it is important that establishments (and specifically the Chair of the Race Relations Management Team) know which staff are trained and/or have previously acted as Race Relations Liaison Officers or Assistant Race Relations Officers. These staff members can then be drawn upon as part of a wider team of support for the Race Relations Liaison Officer.

15.26 The responsibility for ensuring that investigations are carried out effectively rests with the Governing Governor at each establishment. As part of their
responsibilities, Race Relations Management Teams are required to monitor the investigation of racist complaints and their outcomes. Work on investigations will be reinforced in the new training package for Race Relations Management Teams which is currently being piloted across a number of establishments.

15.27 Additionally, the training course for those carrying out investigations was revised and improved at the beginning of 2004. The course includes specific training on dealing with race related complaints and it more adequately reflects the existing practice not only on investigations, but also on race relations. The target group for this course has been extended to specifically include Race Relations Liaison Officers, some of whom were previously excluded because of a grade restriction at Principal Officer level.

15.28 Appropriate training for staff was a major concern for the CRE during their formal Investigation. The Prison Service recognises that investigations must be carried out in a thorough and professional manner. This is doubly important as the conduct of investigations was also criticised by the CRE. REAG will be reviewing the skills and competences required by Race Relations Liaison Officers as part of the review of Prison Service Order 2800 (this work has started) and as part of the Prison Service Race Equality Scheme’s Action Plan. REAG will also continue to monitor the number of Race Relations Liaison Officers who have attended investigation courses as part of the review.

Monitoring establishments

External monitoring

15.29 Recommendations on race equality contained in reports from external bodies, in particular Her Majesty’s Chief Inspector of Prisons; and the Prisons and Probation Ombudsman are actively followed up. A formal log has been set up and maintained by the Race and Equalities Action Group (REAG), to register any issues that are raised by these bodies (from June 2005 recommendations from the Independent Monitoring Boards will also be included). These issues are monitored by REAG who will also offer assistance to establishments to help them to address any shortcomings.
15.30 The Prison Service Race and Equality Advisor undertakes regular visits to establishments to report on race relations. The reports made following these visits are used to inform the visits and actions undertaken by REAG's Delivery and Implementation Team in providing practical support to those establishments that may be experiencing difficulties. Copies of all the Advisor's reports undertaken since November 2003 are attached for information. (document 78).

**Quarterly Questionnaires**

15.31 From October 2004, REAG developed a Quarterly Questionnaire, which provides PSMB and the CRE with a regular, comprehensive range of information on the management of race relations at establishments. The findings from these questionnaires are discussed during meetings held by the Prison Service Director of Operations and Deputy Director General with Area Managers and Governors (a full set of national returns (from October 2004) and analysis is attached for information) (document 79).

**New Race Relations Standards and Key Performance Targets (KPT) for prisoners and staff**

15.32 Establishments are currently carrying out a number of tasks and activities, on a monthly basis, during this business plan year, in preparation for the full implementation of two new Race Relations Key Performance Targets (KPTs) in 2006-07.

15.33 The aim of introducing the two KPTs is to help the Prison Service to measure and better manage the quality of race relations, and to ensure that every establishment has appropriate systems in place to manage all risks related to the effective management of race equality for prisoners, staff and visitors. The KPTs have been constructed to provide a number of measures that strike a balance between processes (e.g. audit measures) and outcomes (e.g. ethnic monitoring data). Importantly, qualitative measures are included that will gauge prisoner and visitors perceptions through the use of prisoner and visitor surveys.
15.34 The KPTs consist of an overall assessment made up of several measures. In essence, the KPTs for race equality replicates the Service’s general approach to KPTs and performance management i.e. by taking a high-level concept or outcome and developing a range of measures to indicate whether it has been delivered. The measures are then combined, with relative weightings, to provide an overall score or assessment. There is strength in combining different measures in this way. Individually, they all have limitations and weaknesses in measuring, but collectively, they provide breadth, checks and balances.

15.35 The KPTs have been rolled out on a shadow basis to give establishments the opportunity to familiarise themselves with the new arrangements and to prepare for full implementation and going ‘live’ in April 2006 (The Race Relations Key Performance Targets Guidance Manual is attached for information).

15.36 The Operational KPT measure has been designed to report on the way in which race relations and race equality are managed between staff, prisoners and visitors. It contains the following elements, which have an associated weighting reflecting their contribution to an overall score.

- Race Relations Audit - 20%
- Racist Incident Report Management - 25%
- Ethnic Monitoring Data - 20%
- Prisoner Survey - 20%
- Visitor Survey – 15%

15.37 A copy of the Race Relations Key Performance Targets Guidance Manual is attached (document 80).

15.38 The staff KPT contains the following four elements that have an associated weighting reflecting their contribution to an overall score.

- Race Relations Audit - 30%
- Racist Incident Audit Score - 30%
• % BME Staff (local target) - 20%
• % BME Staff in Contact Roles – 20%

**Development of the new IT system**

15.39 Work is ongoing, through the National Offender Management Information Service (NOMIS) user group, to ensure ethnic monitoring requirements are fully incorporated within the NOMIS IT user specification.

**Race Relations (Amendment) Act 2000**

Prison Service Associate Race Equality Scheme: 2005-08

15.40 This was published on 26 May, along with the core Home Office Scheme and other Associate Schemes and focuses, primarily, on service delivery in public sector establishments.

15.41 During 2004-5 the Race Equalities Action Group (REAG) has managed a significant national training programme for policy and operational staff (Race Relations Liaison Officer, Chairs of Race Relations Management Teams, Governors and some Area Managers) on impact assessment of local practices and policies for race equality review (over 600 staff).

• In 2005-06, establishments are required to impact assess the following practices:
  ▪ Adjudications
  ▪ Prison Shop or Canteen
  ▪ Catering
  ▪ Complaints
  ▪ Good Order or Discipline
  ▪ Incentives and Earned Privileges
  ▪ Use of Force.

*(Please see the accompanying analysis of the fourth quarter race relations questionnaire: 1st January to 31st March 2005 paragraphs 19, 20 and 21.)*

(document 81)
15.42 The Prison Service Race Equality Action Plan also takes account of work to be taken forward from the joint Prison Service/CRE Action Plan, including:

- Key Performance Targets (staff and prisoners)
- Monitoring
- Training
- Racist incidents/complaints
- Review of the Prison Service race equality policy
- Community engagement strategy
- An impact assessment of Operational Support Grade (OSG) recruitment.

15.43 For further information please see HMPS "the Prison Service Associate Race Equality Scheme" Published May 2005 (attached) and Annex B: the CRE's recommendations for the programme of work to be undertaken by the Prison Service during 2005 - 8

Visits to establishments by Race and Equalities Action Group: The Delivery Team

See Annex C.

The CRE's Report

15.44 Following the CRE's formal investigation, the Joint Prison Service/CRE Action Plan "Implementing Race Equality in Prisons: A Shared Agenda for Change" was launched in December 2003. The Plan has been monitored closely by the Prison Service Management Board and the CRE. Annex A outlines the status of each of the projects within the programme of work.

15.45 The Action Plan formed the basis of a long-term strategy for the Prison Service. Most of the key action points from the high level key deliverables were completed by end March 2005; some will be a permanent feature of the Prison Service especially in respect of monitoring information, training and prisoner intervention strategies, and some will be completed during financial year 2005/06, including the shadow KPTs for staff and prisoners mentioned above.
15.46 Phase 2 of the Prison Service’s programme of work (2005 –2008) that has recently been agreed with the CRE is outlined at Annex B.
## Annex A

### FINAL STATUS REPORT: JOINT ACTION PLAN

<table>
<thead>
<tr>
<th>High Level Key Deliverable One:</th>
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<tbody>
<tr>
<td>Develop robust systems to assess and review all Prison Service functions and activities through it’s policies and standards to ensure delivery of the general duty as set out in the RR (A) A</td>
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<tr>
<td><strong>1.1</strong></td>
<td><strong>1.2</strong></td>
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<tr>
<td>Identify and prioritise all Service functions, policies and standards for race equality review.</td>
<td>Agree framework and develop guidance for review setting out process, consultation and timescales</td>
</tr>
<tr>
<td>Completed</td>
<td>This work is ongoing, and will be carried over to phase 2 of our programme of work with the CRE.</td>
</tr>
<tr>
<td>The revised Prison Service Race Equality Scheme (RES) was launched on 26th May 2005. The revised Scheme now incorporates priority areas for impact assessment for 2005/06 as part of the RES Action Plan (a copy is attached for the Inquiry’s information).</td>
<td>Complete high priority policy reviews to include PSO 2800 Race Relations and Equal Opportunities Standards</td>
</tr>
<tr>
<td></td>
<td>Interim Prison Service Instruction to be issued in June 2005 as soon as the new Race Relations Standards have been agreed. Work on revising PSO 2800 (&quot;Prison Service Order On Race Relations&quot;) is in progress.</td>
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<td><strong>1.3</strong></td>
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<tr>
<td>Implementation and completion of remaining review process to agreed timescales</td>
<td>There is still some considerable work to be done to identify the remaining policies and functions to be reviewed during 2006-08.</td>
</tr>
<tr>
<td>A significant proportion of policies have transferred to the National Offender Management Service (NOMS). REAG will work closely with the NOMS Diversity Strategy Project Team to ensure a smooth transfer of this element of the Scheme.</td>
<td></td>
</tr>
<tr>
<td>This work will therefore be carried over to phase 2</td>
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of the Prison Service’s programme of work with the CRE.

| 1.4 | All proposals to OPG for new/revised policy to incorporate race equality assessment following consultation with REAG | This work was completed during the delivery of Race Equality Impact Assessment Training, which was competed in March 2005. |

High Level Key Deliverable Two:
Establish effective systems to monitor policy outcomes/delivery for adverse impact on race equality and assure accessibility of services and information for all ethnic groups.

| 1.5 | Review of procurement arrangement to identify opportunities and incentives for the delivery of good race relations by contractors through performance measures/contract management requirements | Training on race equality impact assessments for Procurement Group staff was delivered in July 2004. Following training, all procurement arrangements were reviewed and standard documentation was updated (in September 2004) to meet obligations under the RR (A) A.

A pre-qualification form, which is sent to suppliers prior to inviting them to tender, has been expanded to include HMPS policy statement on Equal Opportunities and Race Relations. Suppliers, in their responses, are now asked to confirm that they will abide by the new Prison Service guidelines and to provide details of their own Equal Opportunity and Race Relations policy (to include Prison Service obligations under the RR (A) A).

The Group’s Policy and Procedure Team Business Plan highlights activities to ensure continuing compliance and work carried out in support of HMPS action plan. |
1.6 Ensure all functions and policies assessed as relevant to race equality are supported by arrangements to monitor any adverse impact/accessibility issues and to take remedial action where necessary.

Note: Link to development of improved monitoring data at Local and National level (Section 2 High Level Key Deliverables 4, 5 and 6)

Arrangements for quarterly monitoring are ongoing.

**Staff/ethnic monitoring.** A staff survey was undertaken by a full census of staff in November 2004. The survey contained a section on equality and diversity, which included (amongst others) questions on perceptions of institutional racism and experience of bullying, harassment and discrimination.

A PSI will be issued (June 2005), which will instruct Governors/Groups to produce the monitoring data required and analyse it locally. HR Planning Group have produced a new quarterly review report covering the key elements of the RR (A) A Employment duty.

**Prisoner/ethnic monitoring.** Quarterly review monitoring is now being undertaken to provide PSMB and the CRE with comprehensive range of information on the management of race relations at establishments.

An analytical tool has been developed to facilitate the capturing and monitoring of this data.

Some of the questions on the questionnaire will only be asked on an annual basis. REAG will regularly review the questionnaire to maintain consistency and to consider the need for additional/different questions.

This work will be carried forward to phase 2 of our programme of work with the CRE.
1.7 PSMB to assess performance against the Action Plan and undertake quarterly reviews of race equality data and record action taken where adverse impact is identified

Completed for this phase however PSMB will continue to assess performance against the Action Plan and undertake quarterly reviews.

1.8 Provide guidance and training to policy leads in the Impact Assessment process, incorporating race into policy and service delivery.

Impact Assessment training was delivered to chairs of RRMT /RRLOs /EOOs /Personnel Manager/ Area Performance Managers and was completed in March 2005 (a copy of the Ionnan consultancy training is document 82)

New Action Point
Provide guidance and training to operational managers in the Impact Assessment process.

Supplementary guidance on conducting impact assessments has been issued to those policy leads undertaking review of those practices highlighted during the CRE Investigation as areas of concern.

High Level Key Deliverable Four:
Develop a Key Performance Target for Race Equality (Operational Delivery) which is consistent with the RR (A) A to incorporate the following measures (as a minimum):

- Prisoner Ethnic Monitoring data outcomes
- Race Relations Management Audit score
- Substantiated/unsubstantiated racial incidents (prisoners/visitors)
- Prisoner survey outcomes
- Visitor survey outcomes
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
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</table>
| 2.1     | Develop revised mandatory requirements for prisoner ethnic monitoring in line with RR (A) A at establishment level to include monitoring of treatment/access to facilities and range setting. To incorporate:  
  - Regime activities  
  - Location/accommodation  
  - Adjudications/punishments  
  - Segregation/disciplinary transfer  
  - Complaints  
  - Privilege levels  
  - Use of force  
  - Recategorisation  
  - ROTL  
  - HDC  
Consideration has been given to examine how to expand current prisoner ethnic monitoring (in line with the RR (A) A) at establishment level. This will include monitoring of treatment/access to facilities and range setting in a number of these key prisoner functions and activities.  
This work will be carried over to phase 2 of our programme of work. |
| 2.2     | Develop IT capability to enhance data analysis and monitoring. Specifically:  
  - Standard IQ format for LIDS  
  - Traffic light system for range setting to monitor performance and highlight areas of under performance  
Phase 1 completed: Race Relations Operational (Prisoner) KPT rolled out on a shadow basis from 1.4.05 to 31.3.06.  
Full implementation will take place (with the finalised KPT weightings), from 1.4.06. Work therefore to be carried over to phase 2 of our programme of work. |
| 2.3     | Redesign Racist Incident Reporting Form to explicitly record outcomes (substantiated/unsubstantiated incidents)  
Work on revising the form is complete but on hold. PSMB have asked for a review of the complaints system and the racist incident reporting system. (Furthermore, it has been agreed that the concept of substantiated racist incidents should be removed from the KPT as there were concerns that it may create a perverse incentive not to deal properly with incidents, and it might create a monitoring system that penalises  

establishments for dealing with racism. Instead we should aim to have a measure which is a health check or audit of the racist incident reporting system, reflects the extent to which racist incidents are properly reported and investigated, and result in appropriate actions. See also Annex B: projects in 2005/6. This work will therefore be included in phase 2 of our programme of work with the CRE.

<table>
<thead>
<tr>
<th>2.4</th>
<th>Add additional measures to the MQPL (Measuring Quality of Prison Life) survey to cover race equality issues, including a visitors survey</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.5</td>
<td>Project Group to be established to develop a range of interventions to challenge the racist attitudes /behaviours amongst prisoners</td>
</tr>
</tbody>
</table>

The MQPL and Visitor Survey have been enhanced to include race and equality issues. All establishments are now using the new surveys, which will feed into the new Race Relations KPTs. Work on developing an MQPL for juveniles will be ongoing in phase 2.

Work on developing a range of interventions will be carried over to phase 2 of our programme of work.

To date, a strategy group is being formed, which will develop a broad range of intervention strategies, to include:

- The extent to which Offender Behaviour Programmes can be used to address the attitudes and behaviour of racially motivated offenders (working with both Sentence Management group and NPD);
- A Diversity Awareness Programme based on (DAP), which has been piloted by NPD in Greenwich, HMP/YOI Feltham, Newham, and Havering;
- "Murmur to Murder", developing programmes of interventions that address denial and minimisation, examine the
basis of racism, raise the offender's awareness of the victim's perspective and aims to develop new skills to reduce the risk of re-offending;
- Use of contemporary materials (Videos - e.g. "The Secret Policeman"/Reading - e.g. "Signs of Hate" publication/Information Leaflets about cultural differences.

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<th>High Level Key Deliverable Five:</th>
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<tr>
<td>Develop a Key Performance Target for Race Equality (staff) which is consistent with the RR (A) A to incorporate the following measures: -</td>
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<tr>
<td>• Staff race equality audit score</td>
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<tr>
<td>• Substantiated racial incidents (staff)</td>
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<tr>
<td>• % BME staff</td>
</tr>
<tr>
<td>• %BME staff in prisoner contact roles</td>
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</table>

| 2.6 | Develop a revised mandatory requirement in line with the RR (A) A for staff ethnic monitoring at establishment level across a range of personnel indicators to be considered locally by Equal Opportunity Committees. To incorporate: |
|----------------------------------|
| • Recruitment/employment applications |
| • Retention (including exit interviews) |
| • Staff breakdown (by grade/discipline/specialism/geographical areas) |
| • SPDR markings |
| • Promotion/temporary promotion |

This work has been undertaken in tandem with the development of the Operational (Prisoner) KPT, mentioned at 2.2 above.

Phase 1 completed. Race Relations Staff KPT rolled out on a shadow basis from 1.4.05 to 31.3.06.

Full implementation will take place (with the finalised KPT weightings), from 1.4.06. Work, therefore, to be carried over to phases 2.
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|   | Transfers  
|   | Grievances  
|   | Attendance management procedures  
|   | Investigations  
|   | Disciplinary proceedings and outcomes  
|   | Training  |
| 2.7 | Develop a new Staff Race Equality Standard and Audit Module (from EO Standard), to provide clarity of role / responsibility for RRMT and EOC  
| | This project has a dependency with projects 2.2 & 2.6 above.  
| | When the Standards are finalised, (following consultation), the Standard Audits Unit will develop baselines and associated audit weightings.  
| | This work will be ongoing during phase 2 of our programme of work.  |
| 2.8 | Issue written guidance on incorporating race issues into business plans through the race quality Impact Assessment process  
| | Guidance has been issued to all Directorates on incorporating race issues into business plans through the Race Equality Impact Assessment process.  |
| 2.9 | Project Group to be established to: Review scope for the use of mediation and other intervention strategies for staff / prisoners. Options to address racial complaints and racist behaviour  
| | Work on scoping out the use of mediation and other intervention strategies for staff/prisoners to address racist complaints and racist behaviour is ongoing and will continue in Phase 2 of our programme of work, with a view to conducting pilot strategies in 3 sites from October 2005 to March 2006, and providing the Prison Service Operation Policy Group with an evaluation report and business case in April 2006  |
**High Level Key Deliverables Six:**

Develop central HQ monitoring systems, in line with out commitments under the RR (A) A to analyse overall outcomes for BME prisoners for all functions.

| 2.10 | Develop arrangements for routine HQ monitoring, in line with RR (A) A of Key Performance areas for prisoners and staff to incorporate:  
**Prisoners:**  
Parole  
Categorisation  
Temporary release  
HDC  
Adjudications  
**Staff:**  
Recruitment  
Staff in post (by grade/discipline)  
Retention (by grade/discipline)  
Promotion/IDS  
Appraisal outcomes/performance recognition  
Grievances (by grade/discipline)  
Access to Training  
Investigations/disciplinary proceedings and outcomes | Monitoring system has been set up. Monitoring will be ongoing during the next Phase.  
Work is in hand to ensure monitoring is developed further to meet the requirements of the RR (A) A and to support the Prison Service Race Equality Scheme. |
|---|---|
| 2.11 | To ensure recommendations on race equality contained in reports from external bodies, in particular: Her Majesty’s Chief Inspector of Prisons; the Independent Monitoring Board and the Prisons and Probation Ombudsman are properly followed up. | Database has been established to log recommendations made on race equality contained in HMCIP reports from external bodies. Positive action is undertaken by the REAG Delivery Team ensure that recommendations are properly followed up by establishment.  
This work will continue in Phase 2. |
**High Level Key Deliverable Seven:**
Incorporate race equality as a core component of the Programme Improvement (Benchmarking) programme

| 2.12 | To ensure all Performance Improvement Plans include a core component for race equality | This work has been undertaken and will continue in Phase 2. |

**High Level Key Deliverable Eight:**
To meet or exceed all specific duties and requirements on employment set out in the RR (A) A and ensure equality of opportunity is delivered in all aspects of employment in the Prison Service

| 3.1 | Complete Race Equality Review of Prison Service Employment practice/procedures and implement outcomes | This work was completed with action point 1.1.  
Initial impact assessments have now been carried out and a rolling programme of further work is in place. Prisons will be asked to outline how they are going to implement the findings of assessments as required, and a Prison Service Order will establish the requirement for local monitoring data. |
| 3.2 | Develop effective HQ Personnel monitoring systems to analyse progress on key Employment issues for minority ethnic staff and produce quarterly reports for review by PSMB. To include:  
Recruitment  
Staff in Post (by grade/discipline)  
Retention, including exit interviews (by grade/discipline)  
Promotion/IDS  
Access to Training  
Appraisal Outcomes/Performance | Completed  
Work is in hand to ensure that monitoring is developed further to meet the requirements of the RR (A) A and support the Prison Service Race Equality Scheme.  
Mixture of both IT and paper based systems have now been identified.  
A separate quarterly report is now produced for PSMB covering those areas which need to be monitored (although some areas, e.g. training, cannot be added until Phoenix is online). |
| **Recognition**  
| Grievances (by grade/ discipline)  
| Disciplinary proceedings and outcomes | **3.3** To develop effective practical guide (Recruitment/ Retention) and establish central support mechanisms for area led recruitment targeting BME communities | This work is completed.  
|  | An Outreach Toolkit was issued at the end of September 2004 offering a central support mechanism to local/area recruitment. This includes:  
|  | • National Network for those involved in outreach activity  
|  | • Area Outreach Co-ordinators appointed  
|  | • Annual Outreach conference and regular newsletter  
|  | • National links with support Networks.  
| **3.4** To review recruitment and retention of ethnic minority candidates on intensive Development Scheme (IDS) and develop strategies for improving performance. | A review has taken place. The survey of IDS non-respondents has been completed and the final report circulated to Directors, Area Managers and Area Personnel Advisers. The recommendations from the survey have been incorporated into the IDS recruitment campaign for 2004/5. The findings were considered within an overall impact assessment.  
|  | The outcome of the 2004/5 campaign will be assessed to consider impact and monitor progress.  
|  | Monitoring will continue in Phase 2. | **3.5** To ensure that the standards required of Prison Service staff with regard to Race Equality and Professional Standards documentation are routinely | This work is being undertaken and will continue in phase 2. |
addressed in relevant written and verbal briefing at all levels in the Service.

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<th>High Level Key Deliverable Nine:</th>
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<tr>
<td>To increase the proportion of staff from BME groups to achieve a representative workforce by 2009</td>
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| 3.6 Issue revised performance targets for each Area/Function by establishment and monitor progress on delivery (monthly). | Local BME employment targets have been set for 2005/06 using a new methodology. The new target setting arrangements require every establishment to recruit BME staff at a level above the local working age population and take better account of projected recruitment activity to ensure that targets are challenging but realistic. Work on the target setting process for 2006/07 is already underway and will be monitored in the next phase. |

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<tr>
<th>High Level Key Deliverable Ten:</th>
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<tr>
<td>To ensure effective training incorporating race equality issues (including requirements of the RR (A) A) is developed and delivered to employees and contracted staff on the basis of learning need</td>
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<p>| 3.7 To implement outcomes of the Review of Race &amp; Diversity Training to ensure staff attend training relevant to their working environment and learning needs which incorporates the requirements of RR (A) A. Specific focus to be given to Management Training with Race Equality issues being a Core Component in all course delivery. | REAG is currently undertaking the training schedule to September 2005, which was developed by Newbold Revel. In addition to this training, they are undertaking specific RRMT/RRLO/EOO training as required. This work will therefore be carried over to Phase 2. TDG are reviewing all courses on an ongoing basis to ensure that their content and delivery are meeting the Service’s needs. This review includes an analysis of race and diversity issues. Revision of Prison Officer Entry Level Training to |</p>
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<tr>
<th>3.8</th>
<th>Provide guidance to staff clarifying how Race &amp; Diversity Training will be delivered.</th>
<th>Work to improve delivery of cascaded training is ongoing. The ‘People Manager’s Toolkit’ has been rolled out for use by all managers via Area Training and Delivery Training (ATDT). ‘Top Ten Tips’ has been issued giving examples of good practice and tips for the effective use of the SPDR, to the benefit of jobholders, managers and the Prison Service for use by jobholders and managers alike. Top Ten Tips are now available on the intranet.</th>
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<td></td>
<td>All managers to review the learning needs of individuals as part of the annual Performance Appraisal System and record how these will be addressed through Training</td>
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**High Level Key Deliverable Eleven:**
To maintain impact of race equality training within a generic mainstreamed programme through a dedicated Quality Assurance process

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<tr>
<th>3.9</th>
<th>To roll out Quality Assurance processes for all courses involving External Moderators to incorporate Review of Race/Diversity Training delivery within the mainstream generic programme</th>
<th>The Quality Assurance roll out continues and mainstreaming diversity guidance has been issued as part of the quality assurance toolkit. Work is being undertaken to identify the most suitable means through which external courses can be moderated. This work will be carried over to Phase 2.</th>
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3.10 To undertake an Annual Review of Training delivery across all courses to assess quality/level of delivery, staff participation coverage; areas for improvement and outcomes

The Training Evaluation System is to be used to measure quality of delivery. Areas of improvement have already been identified (based on the quantitative analysis, and feedback from the field) and will be addressed through the review of all diversity/race courses.

Training Evaluation System:
- Q1 training evaluation form completed by trainee at the end of training
- Q2 completed by trainee 3 months after training, evaluating the effectiveness of the training
- Q3 completed by trainee’s line manager 6 months after training, evaluating the effectiveness of the training

This work will be carried over to phase 2 of the programme.

3.11 To develop a specific race and diversity package and refresher course for staff identified as having specialised learning requirements.

This work has been transferred from Training and Development Group to REAG as part of the transfer of responsibilities (April 2005) for the development of policy and delivery of training on race and diversity. Work to be carried over to phase 2 of the Programme.

3.12 To produce Information Leaflets setting out the responsibilities and rights of staff and prisoners under Equal Opportunities Legislation and ensure effective distribution.

NACRO will shortly finalise prisoner and staff leaflets setting out their responsibilities and rights under Equal Opportunities Legislation and ensure effective distribution. Work will be completed prior to commencement of phase 2.

High Level Key Deliverable Twelve:
To develop effective systems at national and establishment level to monitor progress on race equality ensuring compliance with the RR (A) A and taking remedial action to address difficulties.

4.1 Quarterly report to PSMB to include This process of reporting to PSMB will be
<table>
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<tr>
<th>Analysis of data/progress and Traffic Light Review of overall progress against Key Deliverables</th>
<th>ongoing.</th>
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<tr>
<td>4.2 Clarify and reinforce role and responsibility of Senior Management Teams and RRMTs to review Race Equality delivery and ensure remedial action to address difficulties implemented where required</td>
<td>This work is ongoing, therefore will be carried over to Phase 2. Written clarification of the roles and responsibilities of RRLOs and RRMTs has been included in the interim Race Relations PSI and the revised Standards.</td>
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<td>4.3 To produce and publish an account of Race Equality work within the Prison Service as part of its Annual Report. The account will incorporate:</td>
<td>An account of Race Equality work has been incorporated into the Prison Service Annual Report.</td>
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<tr>
<td>• Progress on implementation of Race Equality Action Plan</td>
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<td>• Performance against Key Indicators</td>
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<tr>
<td>• Summary of outcomes from assessment/review of policies for adverse impact</td>
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<tr>
<td>• Summary of Race Equality scheme initiatives/work in hand</td>
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<td>• Plans for future work</td>
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High Level Key Deliverable Thirteen:
To develop improved arrangements for consultation on race equality issues to include:

- Race Equality Working Group (national)
- Community Involvement consultation by RRMTs
- Prison input (extension of MQPL survey)
- Staff surveys at area level
- Director General’s Advisory Board
<table>
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<tr>
<th>4.4</th>
<th>Establish Race Equality Working Group under Chairmanship of the PS Race Equality Adviser to act as an advisory/consultation body supporting PSMB. Formal TOR to be agreed with specific remit to consider any potential adverse impact of policies/practice on minority ethnic groups.</th>
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<tr>
<td>The Race Advisory Group has been formed under Chairmanship of the PS Race and Equalities Advisor to act as an advisory/consultation body supporting PSMB. A formal TOR has been agreed with specific remit to consider any potential adverse impact of policies/practice on minority ethnic groups.</td>
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<td>4.5</td>
<td>To enhance establishment RRMTs through:</td>
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<td>Participation of minority ethnic prisoner representatives on all RRMTs</td>
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<td>Involvement of external community groups on RRMTs</td>
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<td>This role of the RRMT will be enhanced via the interim PSI on prisoner Race Relations. Also, the Delivery Team within REAG will provide the following additional support:</td>
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<td>• Development of a short training programme for prisoner representatives and advice to establishments on community group involvement.</td>
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<td>• Progress will be monitored using the quarterly questionnaire</td>
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<td>Work to be carried over to phase 2 for onward monitoring.</td>
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<tr>
<td>4.6</td>
<td>Develop:</td>
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<tr>
<td>Specific MQPL survey to cover Race Equality issues for prisoners (with Cambridge Institute for Criminology)</td>
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<tr>
<td>Additional specifications for the Staff Survey Team to develop a Race Equality survey for use by Areas.</td>
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<td>Formal mechanisms for reporting feedback from RESPECT members at Area level</td>
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<td>This project was incorporated with the work in project 2.4 above. All establishments are now using the new survey, which will feed into the new KPTs. Work is ongoing, in conjunction with Cambridge Institute for Criminology, to develop an MQPL for juveniles.</td>
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<td>Revisions were made to the November 2004 questionnaire to cover fully the race equality issues highlighted by the CRE.</td>
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<td>Consultation with RESPECT ongoing.</td>
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<td>High Level Key Deliverable Fourteen: To report and publish race equality outcomes and performance against this Action Plan to the CRE and to the wider public.</td>
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<td>4.7</td>
<td>Quarterly reports to CRE to be produced on delivery of Action Plan commitments</td>
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<td>This process of reporting to the CRE will be ongoing.</td>
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<td>4.8</td>
<td>Develop a Prison Service Website to contain summary of Race Equality work being undertaken by the Prison Service and to record progress.</td>
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<td>Work on developing the REAG website is ongoing. The Race Equality Scheme was published in May 2005 and place on the Prison Service Intranet.</td>
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Annex B

Phase 2: Programme of Work Years 2005 to 2008

The following CRE recommendations (written in bold) will be taken forward by the Prison Service over the next three years.

Projects in year 2005/6

CRE recommendation 1: review of the complaints system. Extend ethnic monitoring in establishments to cover all complaints.

Recommendation 2: review of the current racist incident procedures. Extend ethnic monitoring in establishments to cover all racist incidents.

There is general agreement that complaints and racist incidents should be brought together. Race and Equalities Action Group has sought agreement with the Offender Policy and Rights Unit to undertake a joint pilot project to review both the request/complaints and racist incidents systems to include the possibility of bringing them together into one system. This work will form the basis of a research strategy to assess complaints data in more depth, and it will include a review of current best practice where complaints are handled well. The review will also assess the feasibility of independent monitoring of complaints/racist incident data and improvement of the quality of investigations.

Recommendation 3: review of menus on a regular basis to ensure establishments cater for all needs. Produce guidance on the purchase and handling of halal meat. Introduction of regular prisoner consultation on catering facilities across all establishments.

Race & Equalities Action Group will take immediate steps to ensure that local practices cater for all needs through working with area diversity managers and the use of area seminars to disseminate good practice.
Establishments will be required to increase the use of prisoner consultation groups across a number of functions, including catering. Separate guidance will be provided on prisoner consultation, which will be linked to a community consultation strategy. As part of the impact assessment process, the outcome of all prisoners’ consultation will be reviewed regularly by establishment’s Race Relations Management Teams, and a record of action kept.

**Recommendation 4: review of recruitment and selection procedures.**

Establishments to review their positive action steps with regard to the recruitment and retention of under-represented ethnic groups.

Personnel Management Group is introducing new policy, which will require a similar quarterly assessment to be undertaken by all establishments. A new Standard should ensure compliance. The combined effect of local and corporate monitoring should provide a step-change in our understanding of the impact of the implementation of HR policy.

This review will build on the work already undertaken under high deliverable eight of the Joint Action Plan (Phase One). HMPS now produces a detailed quarterly report analysing all employment functions at a corporate level by ethnicity to test for adverse impact. These reports are circulated widely within the Service and are shared with the CRE. Despite being relatively new, the results from this analysis are already driving policy reviews. For example, statistics have uncovered potential concern that competency based sifting may have an adverse impact on BME candidates. Personnel Management Group are urgently reviewing this area.

Excellent progress is taking place in some areas e.g. London. However in other areas, progress is disappointing. The outreach team in the Prison Service Personnel Management Group, which seeks to coordinate, motivate and inspire activity locally for recruiters to work with local communities to improve application rates, is now looking at targeted positive action campaigns, particularly around officer recruitment.

A diversity focussed corporate image has been developed through the use of professionally produced job information sheets and exhibition stands. Assessment of the benefits of this work must remain ongoing throughout the 2005 – 08 programme timeframe.
Projects in year 2006/7

Recommendation 5: extend ethnic monitoring at establishments to cover all complaints and racist incidents.

The cost of making required changes to LIDS has proven prohibitive therefore alternative arrangements are being considered for the short term, using a stand alone spreadsheet developed by an externally contracted IT company.

Recommendation 6: review of procurement arrangements for prison catering to ensure that it meets diverse needs.

Existing catering policy was reviewed and re-issued in 2001. Race and Equalities Action Group will consult with Regimes Management and will undertake a review of Prison Service published standards and culturally appropriate diets in relation to in-house and contracted out provision.

Recommendation 7: establish robust and effective processes for ethnic monitoring of failure areas in establishments. In particular prisoner access to:

- Jobs
- Privilege levels
- Adjudications
- Complaints
- Education

Recommendation 8: guidance to establishments, particularly Race Relations Management Teams, on the use and benefits of ethnic monitoring

Establishments will be undertaking impact assessments on a certain number of these issues in 2005/6, and others in 2006/7, which will provide valuable information about the impact of service delivery. Additionally, work is ongoing, through the National Offender Management Information Service (NOMIS) user group, to ensure ethnic monitoring requirements are fully incorporated within the NOMIS user specification. Rollout of NOMIS is currently expected from July 2006. Guidance to establishments on the use of ethnic monitoring in relation to the two Key Performance Targets on race relations will be finalised during 2006-7.
Recommendation 9: mandatory requirement for all prison staff, including Governors and senior managers, to receive regular race and diversity training and each establishment to have a robust and effective race and diversity training strategy for all staff.

Recommendation 10: review of race and diversity training to ensure that it is relevant to the day-to-day work of staff, to include specific race and diversity training programmes as well as all other training.

Recommendation 11: produce guidance to help establishments to develop race and training strategies; identifying and drawing on existing good practice; and the selection and training of trainers.

Following transfer of the delivery of race and diversity training to the Race and Equalities Action Group, a new training strategy is being scoped, which will be put to the PSMB for consideration in due course.

Recommendation 12: provide guidance to Race Relations Liaison Officers about their role, including time and resources to be committed by establishments to help increase their effectiveness.

Recommendation 13: provision of adequate training for Race Relations Liaison Officers about their role.

Work is already ongoing on a revised training package for Race Relations Liaison Officers.

Recommendation 14: development of a clear job description and person specification for the role of RRLO and robust criteria for the selection of RRLOs.

This is a key priority for immediate action.
Projects in year 2007/8

Recommendation 15: review the measures used for ethnic monitoring to ensure that the right things are being measured.

This work will build on the work already undertaken on monitoring: quarterly questionnaires, the two Key Performance Targets on race, information based on establishments’ impact assessments and local policy reviews. HMPS will be in an excellent position in 2007/8 to ensure that ethnic monitoring for both business and management information systems have been appropriately identified, and to ensure that the right things are measured.

Recommendation 16: promotion, amongst ethnic minority communities, of the Intensive Development Scheme for graduates.

This will build on work and progress undertaken under high level deliverable eight of the joint action plan. In 2004/5, three BME candidates reached the final stage assessment centres. This was a significant improvement on last year when none reached the final stage. Regrettably, none of the three BME candidates that reached the final stage were subsequently offered a place on the scheme.

Recommendation 17: provision of training and briefing to prisoner representatives on Race Relations Management Teams and other groups.

Initial work on training for prisoner representatives is ongoing with the aim of preparing a training module in the near future. Assessment of the benefits of this work will be ongoing throughout the 2005–08 programme timeframe.

Recommendation 18: ensure the performance appraisal system is used to identify common and individual training needs in relation to race equality.

The appraisal system is already used to determine individual training needs. Race and Equalities Action Group will liaise with Personnel Management Group to determine whether guidance for managers on the appraisal system can be extended to include race equality and diversity. We will ensure that this becomes part of the
Group's day-to-day systems. Assessment of the benefits of this work will remain ongoing throughout the 2005–08 programme timeframe.

Recommendation 19: determine the feasibility of developing occupational standards or competencies for race and diversity for all staff.

Race and Equalities Action Group is currently consulting with the Police who have developed a package of new occupational standards. REAG will liaise with Training and Development Group to discuss the feasibility of introducing occupational standards in the Prison Service.

Recommendation 20: whilst the CRE will continue to work with, and monitor, the work of PSMB, they would like over the next three years to pay particular attention to the key role played by area managers and governors. To this end the CRE want to see:

- Robust mechanisms in place for addressing poor performance and for holding area managers and governors to account if establishments fail to meet the race equality duty;

- The development of effective systems for assessing the performance of senior managers on race equality through performance and development reviews/appraisals;

- That effective measures are in place, and used, to deal with senior managers who consistently fail to meet the required standards in relation to race equality.

To facilitate this:

- A process will be implemented whereby the sections from area manager's reports on establishments covering race and diversity issues will be made available to the Race and Equalities Action Group;
• Guidance on staff appraisals and the assessment of race equality through performance and appraisals will form an important element of the new training strategy.
Visits to Establishments: Service Delivery & Implementation Team (SDIT)

HM Prison Leeds

Reason for visit:
As a result of the Hickman and Rose and Amy Rice reports.

SDIT findings:
- Low level of staff trained in diversity;
- Inappropriate use of language by staff and prisoners;
- Low levels of prisoner confidence in the racial incident reporting system;
- Prisoners' perception of inequality in the provision of services;
- Lack of staff confidence: diversity trainers felt unable to challenge colleagues when their behaviour or language was inappropriate;
- Staff failing to engage with prisoners who perceive staff actions to be racist.

SDIT facilitated:
- Focus groups with staff and prisoners to discuss problems and find solutions;
- Provision of training for over 400 staff: topics covered included use of language, professional standards and appropriate use of discretion;
- Support for the establishment with the recruitment of a Diversity Manager and identifying people who would act as ‘diversity champions’ within the establishment;
- Re-training of diversity facilitators training (this remains outstanding but planned for the near future);
- Training for the entire Race Relations Management Team (RRMT) (dates to be agreed);
- One off workshops for volunteers covering the following topics:
  - Positive action and positive discrimination;
  - Challenging inappropriate behaviour;
  - Different approaches for dealing with allegations of racism e.g. staff on prisoner & prisoner on staff;
- Training for Prisoners Race Relations Representatives is currently being arranged.
HM Prison Ashwell

Reason for visit:
Invite received from a Senior Officer (and recently appointed Assistant RRLO), who had little experience in this area of work. The Team were also asked to assess the establishment’s performance on race equality, and provide recommendations on good practice.

SDIT findings:
- Inconsistencies in reports submitted to the Race & Equalities Action Group (REAG) concerning time allocated to race relations work;
- Lack of leadership;
- Limited administrative facilities to support the RRLO e.g. lockable drawers;
- Lack of facilities for prisoners to practice religious observance;
- A need to engage better with BME communities to support the prison’s work in this area.

SDIT action:
A list of recommendations was provided to the Governor, who undertook to build them into the establishment’s race action plan.

HM Prison Hollesley Bay

Reason for visit:
Request made following issues raised by an HMCIP report (June 2004).

SDIT findings:
- No promotion of positive race relations in the prison;
- No engagement with BME communities;
- Lack of culturally appropriate diets;
- The need to give more time to the RRLO, or taking away some of their other responsibilities, which included Safer Custody Officer, Residential Manager, Incentives and Earned Privileges Manager and Orderly Officer on a rota basis.
SDIT action:
Governor provided with a list of recommendations, most of which he indicated he would undertake immediately.

HM Prison Kirkham
Reason for visit:
Requests received from both the chair of RRMT and the Area Performance Team, to assess levels of good practice within the establishment and to disseminate practices to other establishments.

SDIT findings:
Examples of the identified good practice included:
- Substantial evidence of literature promoting positive race equality;
- Diversity awareness events;
- Comprehensive RRMT minutes displaying good community engagement.

SDIT actions:
Examples of the good practice found in HMP Kirkham have been stored on REAG Helpdesk information store for cascading to other establishments.

HM Prison Norwich
Reason for visit:
Request made by the RRLO to assess the quality of locally held investigations.

SDIT findings:
Incident investigations sampled were of the required standard.

SDIT actions:
No follow-up action required.

HM Prison Dartmoor
Reason for visit:
A routine visit by the Head of Group (REAG)

Head of Group/SDIT findings:
External resources i.e. Race Equality Council member, felt unsupported during RRMT meetings.

SDIT facilitated:
- Up-date training for RRMT;
- Prisoner RRMT representative training.

HM Prison Morton Hall
Reason for visit:
Received invitation to attend the Area RRLO meeting. Subsequent invitation received to visit the establishment to assess Race Equality and make recommendations.

SDIT findings:
The SDIT found evidence of good practice, which was subsequently verified by an HMCIP report including:
- Effective monitoring systems (foreign national prisoners and potential deportees);
- Relationships with other organisations, which enhanced communications with foreign national prisoners;
- Culturally diverse diets for prisoners;
- Participation by serving Foreign National prisoners to provide help and support to new prisoners during induction.

Two areas of concern were also identified:
- Lack of facility time for those responsible for race relations
- Lack of information across the establishment on the role of the RRLO and the RRMT.
SDIT action:
- Examples of the good practice found in HMP Morton Hall have been stored on REAG Helpdesk information for cascading to other establishments;
- Recommendations provided to Governor regarding concerns identified above.

HM Prison Birmingham
Reason for visit:
General request for support.

SDIT facilitated:
- Specific training provided to local, dedicated foreign national support staff on facilities and services for Foreign National prisoners
- Training in working in partnership with Immigration and Nationality Department.

HM Prison Highpoint
Reason for visit:
Previous RRLO seconded to the SDIT therefore a number of visits undertaken to provide advice and guidance to the newly appointed RRLO.

HM Prison Guys Marsh
Reason for visit:
Request to assess performance.

SDIT findings:
Audit standards check found the following weaknesses:
- The establishment had three separate diversity action plans: here was a need to pull together all three diversity action plans into one and build in CRE failure areas.
- Lack of participation by prisoners;
- Insufficient focus on diversity issues (lack of visual display around the prison);
- Concern about the quality of the diversity training;
- Lack of communication with other prisons in the area;
SDIT action:
An action plan to address these areas was provided to the Governor.

HM Prison The Mount
Reason for visit:
Request from Deputy Governor to assess and make recommendation on Race Equality.

SDIT findings:
• Training needs: Race Relations Liaison Officer and Assistant Race Relations Liaison Officer;
• Improve the skills of the diversity facilitators;
• Observe the operation of the RRMT and make recommendations on improving its effectiveness.

SDIT action:
Recommendations provided to the governor. SDIT will continue to provide active support.

HM Prison Bristol
Reason for visit:
A recent HMCIP report highlighted serious neglect of race agenda in this prison. The report found that:
- Lack of resources targeted on race;
- Low prisoners confidence in the complaints and racist reporting system.

SDIT facilitated:
• Training to the Race Relations Management Team (which, regrettably, was cancelled due to lack of take up);
• Diversity training for staff;
• A full audit baseline assessment;
• Piloted a training package for prisoner representatives;
• Training on how to conduct impact assessments.
HM Prison Liverpool

Reason for visit:
Request from the Area Performance Co-ordinator to assess and make recommendation for improvement on Race Equality.

SDIT action:
Provided recommendations on:
- Improved provision of culturally appropriate diets
- Up dated RRMT training, including training on impact assessments.

HM Prison Eastwood Park

Reason for visit:
Request from Efficiency & Consultancy Group to assess progress on the Service Level Agreement made 12 months previously, following a Performance Improvement Plan.

SDIT findings:
- The promotion of race equality is given a higher profile within the establishment.
- Actively engage and develop community links with BME community, and invite their attendance to RRMT.
- BME Prisoners consultation meeting should start taking place.
- Prisoners induction pack needs to include more comprehensive information in regards to Race Relations.

SDIT action:
Action taken: A full assessment report with recommendations was sent to ECG on their request.

HM Prison Featherstone

Reason for visit:
Generic request for assistance on race equality issues received following an internal investigation by the Senior Management and RRMT. The internal investigation findings included:

- Use of inappropriate terminology
- A lack of strategic leadership
- A culture of institutional racism/sexism

SDIT facilitated:

- A workshop for the Senior Management Team, which addressed cultural change;
- Help and support was also provided in the recruitment and selection of a new Race Relations Liaison Officer and Diversity Manager. The Team is providing on-going mentoring for the newly appointed RRLO;
- Further workshops for intermediate managers and all other staff have been planned.

**HM Prison Kingston**

**Reason for visit:**

Generic request to observe how race relations was being managed.

**SDT findings:**

Good practice was identified, which included:

Comprehensive RRMT minutes which followed up action points.

- Culturally appropriate diet.
- Extensive training for staff
- Examples of community engagement.

**HMP/YOI Portland**

**Reason for visit:**

Request for assistance from the newly appointed Governor and local POA branch.

**SDT findings:**

A pre-visit indicated deficiencies in all of the CRE failure areas including:

- Low number of BME people working in the prison;
- Poor dietary provision;
- A lack of staff understanding about cultural difference;
• Lack of provision of canteen products for BME prisoners.

SDIT action:
A week of intense interventions co-ordinated by REAG included:
• Race relations training for approximately 140 staff;
• The promotion of good practice across a range of facilities and practices, particularly catering, with the assistance of a procured caterer brought in from the private catering sector;
• Prisoner focus groups allowing them to explore issues of concern to them (approx 90).

HM Prison Winchester
Reason for visit:
Following the receipt of a positive HMCIP report, a request was made by REAG to assess the good practice findings highlighted in the report and to share the findings with other establishments.

SDIT findings:
Examples of good practice included:
• Well-resourced support for diversity matters;
• Varied diets with a pro-active caterer;
• Visitor’s ‘hot line’ direct to the RRLO;
• ‘Credit card’ size handouts to staff giving important advice;
• Good attendance on the RRMT
• A comprehensive race equality strategy.

SDIT action:
Examples of good practice have been stored on REAG Helpdesk information store for cascading to other establishments.

Recurring issues highlighted by Service Delivery & Implementation Team
1. Terminology
   What is/is not acceptable language, terms of reference or words to be used within the Prison Service amongst prisoners and their peers or staff. For example:
The word “nigger” is not an acceptable word to be used even if two people of the same race are using it.

2. Impact Assessments
Staff still unaware/not sure of how impact assessments should be completed and who is responsible.

3. Race Relations/Diversity Managers/RRMT support
Due to the availability of resources in some of the Prison Service areas and a lack of training availability some staff in the above mentioned posts need more advice and guidance than others. For example:
   1. Diversity trainers who felt ill-equipped to challenge what was said in training sessions.
   2. Up dated training for RRMT members
   3. Training for prisoners: working with staff to forward this agenda.

4. Audit Standards
Where we have carried out our assessment of how the baselines are being met, prisons invariably score lower than on their own self-audit e.g. HMP Eastwood Park’s self audit score was 93% (REAG scored the establishment at 73%).

5. Lack of contact with external BME organisations.

6. Success
Where prisons have shown progress, they have:
   - Committed resources
   - Leadership, which makes clear the need to embrace change.
   - They exchanged ideas: with groups both inside and outside the Service.