

Jo Farrar  
Second Permanent Secretary, Ministry of Justice and Chief Executive Officer, HMPPS  
102 Petty France  
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SW1H 9AJ

14 October 2021

Dear Jo,

### **The HMPPS Race Action Programme: PRT concerns**

I am writing to seek clarification about the HMPPS Race Action Programme, particularly as it relates to prisons.

PRT welcomes the establishment of the programme and the resources devoted to it, but there is very little in the public domain about what it comprises or how its success will be measured. We have helpfully been sent a launch booklet dated December 2020, which briefly describes the 5 projects that make up the programme. However, there doesn't appear to be an overall programme document against which the collective impact of those 5 projects will be assessed, and which describes the resources available for implementation or the timescale for delivery of any specific objectives.

The 5 projects also appear to be focused heavily on staff, with only brief mentions of prisoners. We understand the importance of a diverse and culturally competent workforce in delivering fair outcomes for prisoners, but the document is silent about the many aspects of current delivery which a variety of data suggest are disproportionate in their impact on people from different ethnic groups. We are surprised that the section on data only describes the ethnic makeup of the prison population (over which HMPPS has little control), but not the evidence of disproportionate outcomes in use of force, categorisation, disciplinary procedures, complaints handling, and other areas of the prisoner experience regularly highlighted by the inspectorate and other independent observers.

We know that HMPPS has also devoted resource to its response to the Lammy review recommendations specific to prisons, and it may be that there is complementary work which this launch booklet does not include. But as it stands, the booklet doesn't appear to describe the problem that ultimately needs to be solved, which is the discriminatory treatment of prisoners.

Earlier in the year, I asked if there was a central register of equality assessments carried out to inform changes in policy relating to prisoners. I was told that there was no central register. I confess I was surprised. We have seen equality assessments from time to time, some very impressive and others less so. But we have also seen that the responses to those assessments can vary a great deal.

At one end of the spectrum, a decision may be taken that the predicted discriminatory impacts are an acceptable price to pay for some other policy objective. At the other, promises are made to take action which it is hoped will prevent discrimination. It seems essential to any Race Action Programme that there should be a central understanding of the potential collective impact of policy changes on discrimination, and also a central assessment of the extent to which measures designed to prevent or mitigate such impacts are implemented and having the desired effect.

It would be helpful and reassuring, therefore, to know:

- That there is a programme plan, and when it will be published.
- What measures of success the programme has been set, and to what timetable?
- That as part of the programme there is an intention to maintain a central register of equality assessments, to monitor the actions taken in response to them, and their effect.

I understand that the Race Action Programme was set up as a 3-year programme and has just 12 months left to run. I hope you will agree that its publication is already therefore a very long way behind schedule, and feel able quickly to provide the reassurances this letter seeks.

Given that this letter is all about transparency, I am placing a copy of it on our website and will do the same with your response once received.

With best wishes



Peter Dawson  
Director