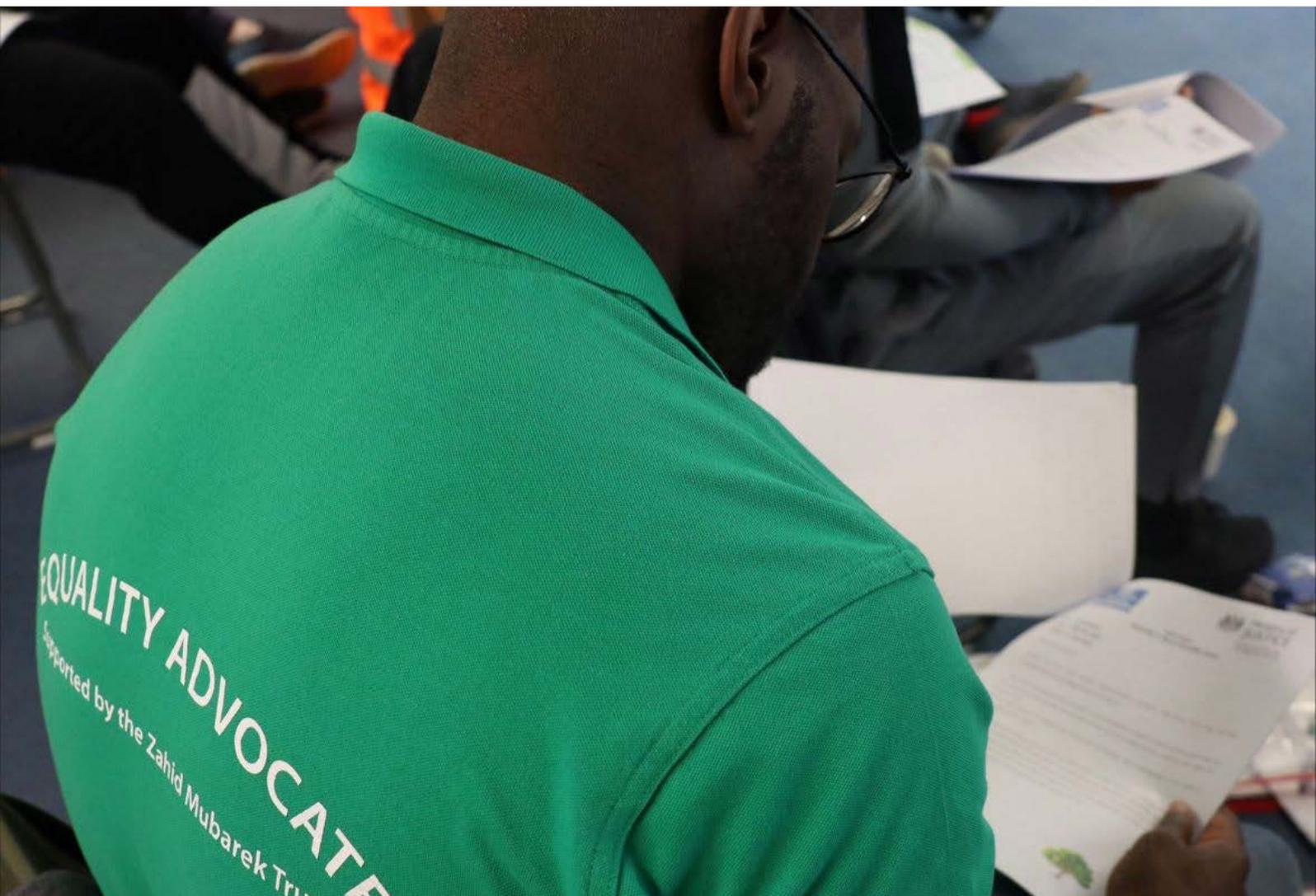


The Wayland Pilot:

Use of a peer-led scrutiny panel to amplify voices and restore trust in the discrimination complaints system in prisons



Acknowledgement

The Zahid Mubarek Trust (ZMT) would like to thank a few individuals without whom this report would not have been possible.

In particular, Gary Monaghan, Sev Bikim MBE, Kevin Clark and Amy Wilford, who believed in our innovative model and have been exceptionally supportive at every step of this pilot.

Alice Dawnay, justice consultant and founder of Switchback, for taking up this task of pulling together this report with admirable passion and care.

Shakeil Hemmings, Regional Lead at the ZMT, for contributing to the literature review for this report and for sharing his invaluable knowledge of race relations in prisons.

The ZMT is grateful to the Barrow Cadbury Trust (charity number 1115476) and T2A for its support of this project, and for its long-standing commitment to racial justice in the Criminal Justice System (CJS).



Above all, the ZMT would like to thank the prisoners who took part in The Wayland Pilot and have shown to us exemplary hard work, commitment and dedication to improving the discrimination complaints system. Particularly, to three young adult prisoners for their honest feedback and initial scepticism in the DIRF system which made this initiative even more worthwhile.

The views expressed in this report and any errors made are the ZMT's alone.

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About The Zahid Mubarek Trust

The Zahid Mubarek Trust (ZMT) is an independent national specialist charity committed to racial justice in the prison system. It was founded by the family of 19-year-old Zahid Mubarek who was murdered in March 2000 by his racist cellmate on the morning of his release from Feltham Young Offender Institution.

The publication of the **Keith Report** in June 2006 followed an 18-month Public Inquiry into Zahid's death and marked the end of an arduous campaign for justice by Zahid's family and supporters.

The publication of the Inquiry report with 88 far-reaching recommendations represented a new beginning for the Mubarek family. They wanted to ensure the meaningful implementation of the Inquiry's recommendations, addressing systemic failures in safety, mental health and race equality in the prison system. Political and public recognition of these failures has provided the family with the opportunity to oversee the development of policy and procedures stemming from the Keith recommendations. To formalise its advocacy role and carry on with this legacy, the family and supporters established the ZMT in 2009.

The ZMT has been supporting the development of discrimination complaints processes and conducting external scrutiny of discrimination complaints (DIRFs) in prisons.

The Equalities Advocates Project has been operating since 2021, training prisoners as peer workers to promote race equality and improve the treatment of and outcomes for ethnic minority prisoners. This pilot takes this Project to the next level by training up peer-led DIRF scrutiny panels and facilitating the running of the Connect. Communicate. Change. (CCC)* groups with Equality Advocates and prison staff.

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1. Introduction

Discrimination happens in prisons as it does everywhere. But in prison the stakes are high. Unfairness and perceived unfairness is a fast track to a breakdown in trust, and an escalation of tensions that can lead to conflict. When a complaint is made about discrimination it needs to be properly responded to, acted upon and learned from within a clear, timely and fair process and, moreover, this needs to be seen to have been done.

In November 2023 the Zahid Mubarek Trust (ZMT) set about developing a pilot project to address the lack of confidence in the prison discrimination complaints system amongst ethnic minority prisoners, with a particular focus on young adult prisoners. The ZMT then delivered that pilot in HMP Wayland from January to April 2024.

This is a report looking at what was done and what impact The Wayland Pilot has had. Its aim is to share the findings and outcomes from the pilot with other Diversity & Inclusion Leads (D&I Leads) who are looking for effective solutions to improve confidence in the discrimination complaints process.

The Wayland Pilot was designed to inspire creativity, innovation and bravery around championing prisoner voices and building trust in the discrimination complaints system, particularly among ethnic minority and young adult prisoners.

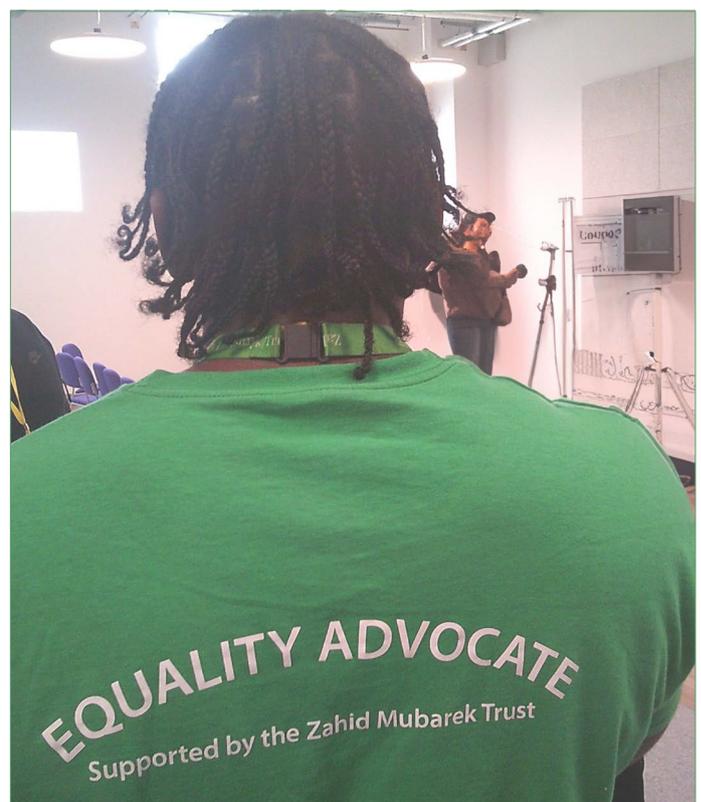
Addressing the lack of confidence and negative perceptions is not a target, it is a process. The Wayland Pilot has shown that meaningful change will not happen without commitment, consistency and a whole heap of courage.

The position of the ZMT is that if prisoner confidence in the discrimination complaints system is increased, the system will work. This will further increase trust in authority and the wider system, thereby implementing a virtuous loop.

The ZMT starts from a belief that there are plenty of reports that substantiate the reality of the mistrust in the DIRF system which demonstrate how longstanding these problems are.

The ZMT's intention is not therefore to gather more evidence to illustrate the problem of discrimination in prisons, but rather to reimagine and offer practical solutions by establishing and demonstrating excellence: a gold standard approach to handling the DIRF system.

This way, the ZMT can show that there are other pragmatic, practical and less resource intensive ways of doing things which are available to prisons and which can help them.



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Equality and Fair Treatment in prisons

As a public body, HMPPS has a legal duty under the Public Sector Equality Duty and the Equality Act 2010 to ensure fair treatment for all prisoners and staff. These duties are conveyed in the current equalities policy: PSI 32/2011 Ensuring Equality¹.

Prisons are:

- **Developing and maintaining anti-discrimination policies:**

HMPPS must have clear policies in place that define discrimination, harassment, an victimisation, and outline procedures for reporting incidents.

- **Promoting equality and diversity:**

HMPPS should actively promote a culture of equality and diversity within prisons, fostering mutual respect and understanding. This could involve training staff on unconscious bias and providing equality awareness programmes for prisoners.

- **Ensuring accessible complaint procedures:**

HMPPS needs to have accessible and effective complaint procedures that allow individuals to report incidents of discrimination, harassment, or victimisation without fear of repercussions. These procedures should be clearly communicated to all staff and prisoners.

- **Fair and thorough investigations:**

When complaints are submitted, HMPPS is obligated to conduct fair and thorough investigations into the allegations. This ensures all parties involved receive a just outcome.

International human rights law reinforces domestic legal frameworks by firmly enshrining a prisoner's right to complain about discrimination (e.g., *United Nations Standard Minimum Rules for the Treatment of Prisoners 'the Nelson Mandela Rules'*). These layers of protection underscore the critical role of complaint mechanisms in safeguarding the fundamental rights of people in custody.

For a while, discrimination was seen as synonymous with racism in the Prison Service. The Commission for Racial Equality (CRE) investigation in 2003 resulted in a Racist Incident Reporting Form (RIRF).

The introduction of the Equality Act 2010 marked a significant shift. This Act broadened the scope of the Prison Service's duties beyond just race. To reflect this change, the prison system adopted the Discrimination Incident Reporting Form (DIRF), allowing prisoners, staff and visitors to report discrimination based on any of the nine protected characteristics outlined in the Act:

1. Race
2. Religion or belief
3. Sex
4. Sexual orientation
5. Gender reassignment
6. Disability
7. Age
8. Marriage and civil partnership
9. Pregnancy and maternity

Currently, the overarching framework for managing equality issues in prisons is outlined in the PSI 32/2011 (2011) and Guidance on DIRFs (2023). The PSI 32/2011 ensures that prison practices comply with the Equality Act 2010, and promote a fair and inclusive environment for all prisoners.

The reasons for the focus on race and young adults in this pilot

Prevalence: Race is by far the greatest preoccupation of the discrimination complaints system. In the report that the ZMT and the Prison Reform Trust co-authored in 2017, an evaluation of 610 DIRFs found that the majority (62%) were about race with religion second (15%), and disability third (10%). The results of that study show that while 70% of DIRFs were submitted by prisoners alleging discrimination by staff, only 1% of them had their case upheld. The researchers concluded that “the system for handling discrimination complaints in prisons is neither fair nor impartial, does not have the confidence of prisoners, and is failing to provide prisons with the opportunity to learn and provide more equitable treatment.”²

Expertise: Race in the prison system is an area that ZMT has deep knowledge about from its lived and learned experiences.

Further evidence: The recent thematic on the experiences of black men and black staff in prisons from His Majesty’s Inspectorate of Prisons³ showed that even after years of seeking to address racial equality in prisons following the findings from the Zahid Mubarek Public Inquiry⁴ and inquiry by the Commission for Racial Equality (CRE), confidence amongst black prisoners in discrimination complaints remained stubbornly low. This prompted the ZMT to take action and commit to demonstrating how the discrimination complaints system can be improved.

Hardest to prove: The challenge of addressing racial allegations is arguably bigger than addressing allegations of discrimination against any other protected group. This is both in terms of capturing hard evidence (for example, in the case of disability discrimination, reasonable adjustments have either been made or they haven’t) and in terms of the profound fear of being called a ‘racist’, which drives defensive responses.

Most distrustful: This pilot sought to challenge itself by having a focus on young adult prisoners. This group tends to be distrustful of authority and unlikely to trust the complaints system in prisons.⁵ Specific needs and challenges of young adult prisoners are not explored and addressed enough. There is little literature and focus on the lack of trust among young adults in the complaints system, especially from the violence reduction perspective. We knew that it would be challenging to centre young adult prisoners in a four-month pilot as there was so little time to build trust with them in HMP Wayland. However, we did bring them in to ensure we were including those at the sharp end of discrimination who were least likely to submit a DIRF.⁶ Also, because we felt sure that bringing this group on side would have the biggest impact. If young adults were to use DIRFs as a method of communicating their frustration when they felt injustice (instead of a physical manifestation), this would make a real difference to the safety and culture on the wings.

HMPPS priorities: The Wayland Pilot fits into His Majesty’s Prison and Probation Service’s (HMPPS) future priorities of promoting more peer-led initiatives in prisons as part of their regime design work. It also addresses the findings from the recent HMIP thematic: “The experiences of adult black male prisoners and black prison staff”, highlighting the lack of confidence amongst black prisoners in discrimination complaints.

Why HMP Wayland

HMP Wayland was chosen as the site for this pilot because of its people. Prison Group Director Gary Monaghan, Regional D&I Lead Sev Bikim MBE, Governor HMP Wayland Kevin Clark and D&I Lead at HMP Wayland Amy Wilford, were open-minded about the idea and were not put off by the scale of the potential additional work that this pilot would entail. The ZMT was assured that **“this team is willing to listen to whatever this pilot might bring up to the surface and the findings will be taken on board as learning opportunities.”** (Feedback from the ZMT staff)

The ZMT believes that this kind of pilot could not work in a prison where there was no commitment to honest reflection and improvement. In fact, non-defensiveness and striving to improve are prerequisites for any prison looking to adopt this approach.



© HMP Wayland



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Methodology

This report describes the value of the peer-led scrutiny panel and how it aims to impact on the trust, confidence and enhanced legitimacy of the discrimination complaints system. It also seeks to describe the potential of peer-led scrutiny panels beyond this pilot.

Scoping for this report included:

1. **Two visits to HMP Wayland, during which the following activities took place:**
 - Observation of a DIRF scrutiny panel session
 - Observation of the CCC* group meeting (linked to DIRF outcomes).
2. **Feedback from a group of five Equality Advocates and two other prisoners who made up the peer-led scrutiny panel**
3. **Conversations with Amy Wilford, D&I Lead**
4. **Conversation with Sevcan Bikim MBE, Regional D&I Lead**
5. **Gained feedback from Gary Monaghan, Prison Group Director for Bedfordshire, Cambridgeshire & Norfolk, and Kevin Clark, Governor of HMP Wayland**
6. **Various conversations with the co-director of the ZMT, Khatuna Tsintsadze**
7. **Desk research**

2. Context

Discrimination in prisons

A historical problem of racism and racial disparities in the prison system is well documented.

As long ago as 2008, The Race Review conducted by the National Offender Management Service (NOMS) found 'Investigations into race complaints were generally of poor quality' and 'unreasonable standards of proof were imposed, and complaints were hardly ever upheld.'⁷ The lack of trust in the discrimination complaints system by ethnic minority prisoners – particularly those of whom are young adults – is a longstanding feature.⁸

In a challenging environment, reporting discrimination traditionally comes across as a combative move. Defensiveness can feel like the usual response.

The purpose of the DIRF system is also to make staff and prisoners accountable for instances of discrimination, to learn from this and develop a healthier, fairer culture. Yet too often the DIRF process is not working. Prisoners and staff alike are clear that this is because the basic ingredient of trust is missing.

Prison is perhaps the most 'them and us' of any working environment. The whole justice system is based on a binary judgement and people quickly fall into camps: victim or perpetrator, guilty or not guilty, detainer or detainee...them or us. Power imbalances both forge and exacerbate judgementalism. In prison, those who are incarcerated feel there is a first layer of discrimination that exists because they are prisoners and therefore 'less than'. All other discrimination and bias against protected characteristics is additional and cumulative.

However, discrimination works both ways in prisons. Strong feelings about prison officers as a group exist and this can also be seen to

play a part in poor relationships between the prisoners and staff.

Additionally, discrimination exists between prisoners and between staff as well as anywhere that human interactions occur (including visitors and civilian staff). The DIRF system exists to serve all of these. Safeguarding is not possible in an environment where consistency and confidence in process does not exist.

The discrimination complaints system is crucial to addressing racial disparity in prisons by providing a safe space to report systemic and interpersonal racial discrimination. Since its inception, the ZMT has been championing a more effective and efficient discrimination reporting system by contributing to national policy development and local practice change. This advocacy is necessary as fair treatment and race equality tend to slip down the priorities list in a justice system under unrelenting pressure.

However, maintaining the fair investigation of discrimination complaints as a priority in prisons depends on local and national factors. Building genuine confidence in a commitment to equality takes more than one or two initiatives such as training case managers or introducing the external scrutiny of DIRFs. It requires proactive determination from leadership to ensure activity promoting fair treatment is woven into everything from the induction process to monitoring trends and outcomes. Much of the time, a well-intentioned attempt to build confidence in discrimination complaints is seen in isolation rather than in conjunction with other work around equalities.

This doesn't stick. It must be embedded as part of an approach that includes, for example, the meaningful induction of newly arrived prisoners, effective equalities data collection and analysis, regular and well-attended equalities meetings, visibility of the equalities team, and trained and visible prisoner equalities representatives.

What are Discrimination Incident Report Forms (DIRFs)

DIRFs are the discrimination complaint forms that are submitted when someone believes a discriminatory incident has taken place. DIRFs require a full investigation where all parties are spoken to leading to a clear, respectful and evidence-based response within a set timeframe.

The purpose of the DIRF system is to provide a route for complaints about discrimination that is distinct from the generic complaints system (which might deal with issues like lost items, for example, or other issues that are more easily resolvable).

Separate reporting from regular complaints means that discrimination can be better identified and more readily monitored. DIRFs are for complaints which show a detrimental difference in treatment due to a protected characteristic that has no reasonable explanation. They are processed through one department – Diversity and Inclusion – rather than needing to be allocated centrally to say, a specific prison wing or reception. Through this system, the complainant is able to raise concerns and share their feelings. This is not simply an administrative process - if done well, the complainant's ability to raise their voice and be taken seriously has a big impact on their sense of worth and humanity.

As such, the DIRF system should contribute to the development of supportive and helpful relationships within the prison system – both between prisoners and staff, and within these groups. We know that good staff-prisoner relationships are an indicator under Respect in HM Inspectorate of Prisons' Expectations.⁹

However, if the DIRF system is not working for prisoners or prison staff, this undermines any commitment to improving those crucial relationships.

Challenges of the discrimination complaints system

The current system of discrimination complaints is widely perceived to be ineffective. Staff and prisoners in HMP Wayland spoke about the danger that DIRFs themselves are seen as futile rather than the way they are implemented (or not) and therefore something that a concerted effort can fix. The 2022 HMIP thematic on the experiences of adult black male prisoners and black prison staff described DIRFs as perceived to be ineffective partly because it is too difficult to prove what happened when the discrimination experienced is 'predominantly subtle, unconscious and difficult to identify'. There were very few DIRFs submitted by black prisoners that were upheld in the prisons visited for the thematic.¹⁰

Practicalities: On a straightforward practical basis, there is an issue with the prisoner having to get a DIRF form from a wing officer, and then post the completed form into a box next to the wing office. The prisoner worries that it may be read and dealt with by the same officer that the prisoner had the problem with. The message this gives is that the DIRF system has been set up to 'tick a box' to indicate the existence of a system for discrimination complaints without it being thoughtful enough to convey that the prison cares about whether that system works or will produce meaningful outcomes.

Accountability: Culturally, prisons are not conducive to discrimination incident reporting. Disempowered officers will not be able to challenge their colleagues for behaving wrongly (officers called as witnesses of discriminatory behaviour are prone to use phrases like "I cannot confirm or deny..." to buffer themselves from involvement in situations). A belief in the DIRF system indicates a belief in organisational development but the "blame culture", that we hear a lot about in prisons, is at odds with this learning culture.

Clarity and consistency of process:

Prisoners often report to the ZMT that they receive ambiguous responses to DIRFs, their DIRFs have not been upheld but it's not clear why not, or what actions were taken to ascertain the result. Often too much time has elapsed before the complainant gets a response. 14 days is the target with up to 28 days given in special circumstances (to be agreed with the Governor). There is plenty of evidence that while some prisons operate within the time frame, many do not. The ZMT receives feedback from prisoners who simply never hear back about their DIRFs. In some cases, because of the delay, prisoners will have been moved or released by the time the investigation has been completed.

"Long delays in DIRF responses communicate disregard and in some cases disrespect. What might be a short time for you may be daily suffering for me whilst I wait to see if my voice has been heard."

(Feedback from a panel member)

Undermining of the process:

Prisoners often report to the ZMT that after the submission of a DIRF, they may see the wing officer coming towards them with the DIRF in their hand saying, "what's this all about?". The officer is trying to resolve the issue through taking it up with the prisoner rather than letting it go through the correct process. Sometimes this may be for genuine reasons of wanting to address and resolve a problem. Sometimes it might be because they want to intimidate a prisoner into not using the DIRF process as it might 'show them up'. The scrutiny panel explained that there had been a fear of submitting DIRFs due to reprisals and potential victimisation from staff.

There was a sense that amongst prison staff a DIRF is loaded with accusation and blame rather than a means of transparency, accountability and learning.

The 2022 HMIP thematic, 'The experiences of adult black male prisoners and black prison staff',¹¹ found that genuine complaints of racial discrimination were still undermined by prison staff claiming that prisoners were 'playing the race card' and white staff themselves were critical of the DIRF system, feeling that they were just a tool for prisoners to make spurious accusations against them.

A lack of trust that goes both ways:

The ZMT heard from prisoners that their experience of some officers was the start of problems, not the end of them: "I avoid talking to officers at all costs." They also described feeling that officers "left their humanity at the door."

Prison capacity and staffing:

Staff are overstretched and working in overcrowded, under-resourced prisons.¹² They are operating in high-risk environments and are spending much of their time in fire-fighting mode. Resolving discrimination complaints may be overlooked in favour of seemingly more pressing issues.

Equality, Diversity and Inclusion (EDI) not being a priority:

DIRF investigation and response processes are often not being correctly followed or are not thorough enough. There could be a number of reasons for this, including a lack of knowledge of how it should be done, a lack of commitment to EDI by prison leadership, a lack of training for prison staff in importance of EDI, a fear of what it will mean to do this job well (in terms of reprisals from colleagues) especially amongst newer, less experienced staff.¹³

The implications of a poorly functioning discrimination complaints system

It is concerning that there is a system for discrimination complaints which is not working and not being fixed.

It is a safeguarding issue. Frustration levels can go from 0 to 60 in a flash in a prison environment. As one panel member put it, “we all know how a little thng can become big”. For some prisoners, their first language is violence, so a lack of clarity or a perception of unfairness is a risk. Frustration is an emotion the prison would do well not to feed or aggravate. To an officer, with lots on his mind and lots to do, a small action influenced by unconscious bias, or even a discriminatory comment may seem petty and inconsequential. For a prisoner, with nothing else to occupy his mind for the most of the day in his cell, such comment might be enough to have him boiling over with rage by the time his door is unlocked for association.

The scrutiny panel described festering frustration as like a ticking time-bomb in the prison. With insufficient other distractions people are prone to ruminate on unfairness. For many in prison – those who have grown up in poverty or in the care system, those from an ethnic minority background or with experience of domestic violence in childhood – unfairness is something they have experienced all their lives. For some, this means they expected nothing less and internalise the discrimination. For some, the cumulative nature of the inequality means this could be the straw that broke the camel’s back. Confimation bias is often seen; an assumption that officers don’t care because people in positions of authority have never previously cared. In this case, there is a missed opportunity to re-set expectations and begin to establish new patterns.

It also matters because if DIRFs are neither working nor being fixed, this communicates an acceptance of the injustice of the status quo. Incidents of discrimination are surface

level symptoms of a deeper malaise and if they are not exposed and rectified and learned from, then speaks to denial of the layers of problems within the prisons. It is a system performance issue that is being revealed and it is being demonstrated in such a way that it is an opportunity for the staff member or the prisoner to be part of finding a way forward, to benefit from training – or at least a conversation – that will further their understanding and make it less likely to happen again.

“Everyone needs to feel they are treated fairly irrespective of background. If you have an issue about inclusion, it is vital that you have confidence in the DIRF system so that you feel heard and are treated in a bureaucratically legitimate manner. You also need to know that the organisation and people in it care about your fair treatment and are clearly open to challenging, or encouraging learning in staff and prisoners who might act in a prejudicial manner. If you do not have confidence in the DIRF process, you will not have confidence or see legitimacy in prison staff and the wider organisation. You are therefore less likely to engage with rehabilitation or indeed are less likely to conform to behavioural expectations.”

(Feedback from a senior leader, HMPPS)



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3. The Wayland Pilot

The ZMT's proactive response to the lack of trust in the discrimination complaints system was to establish a peer-led scrutiny panel in HMP Wayland as part of a pilot, which ran from January to April 2024. This pilot is infused with ambition, hope and expectations that have been fed by many years' worth of evidence on the profound benefits of prisoner participation. We will seek to summarise it here.

Why is a peer-led scrutiny panel the answer?

The ZMT is building on the value of well-supported prisoner representation schemes. This pilot follows much literature on the subject including from the Race Review 2008.

The ZMT believes that a well-trained and well-run peer led scrutiny panel has the power to create the environment for what good looks like in handling discrimination complaints system demonstrating the following qualities:

- Procedural justice: this refers to the perceived fairness of the processes used to make decisions and resolve disputes
- Legitimacy: experiencing fairness within legal systems fosters a sense of legitimacy and respect for the law itself.
- Giving voice to prisoners
- Increasing positivity and confidence in the staff and the greater system
- Prisoner involvement in custodial decision-making through proper consultation.

Lord Wolfe, as early as 1991, recognised the significance of prisoner involvement in fostering a sense of legitimacy within prison custody.¹⁴

He argued that allowing prisoners to participate in and understand how the prison operates is not just a matter of justice but also common sense. By increasing their understanding of prison processes, prisoners are less likely to feel aggrieved and become discontented.

“Having a voice is essential to managing the wellbeing of prisoners and assists directly in creating a safer environment. Without having voice, prisoners will result to unrest to be heard. Putting themselves and other at risk. I feel like I have that voice here.”

(Feedback from a panel member)

Studies suggest that when prisons prioritise fairness and address prisoner concerns, they tend to be more peaceful. Research into the effect of the management regime on disruptive behaviour by Davies & Burgess (1988) observed a decline in violence in a prison after a new governor introduced staff-prisoner committees and meetings.¹⁵ These meetings increased communication and fostered a sense of shared goals between staff and prisoners. Additionally, they provided a neutral space to address grievances and reducing tensions.

Research by Tom R. Tyler (1997) into procedural fairness and compliance with the law¹⁶ suggests that procedural justice and the fairness of the process used to reach a decision are more important than the outcome itself in gaining people's acceptance. People have more positive feelings about a process if they perceive it as fair, regardless of the final result. This concept can be applied to prisoner involvement in prison processes and procedures. When prisoners are included, research suggests it leads to positive outcomes, such as increased legitimacy, confidence, and improved behaviour. Similarly, including prisoners in reviewing discrimination complaints could foster positive feelings about the process, aligning with Tyler's work on procedural justice.

The Prison Reform Trust's work looking at 'Active Citizenship' in 2011¹⁷ showed that schemes which promoted responsibility and contribution to the prison community, have also shown to positively influence rehabilitation and desistance from crime.

"Some of the behaviour patterns that we carry had led us to being in custody. Learning new and effective methods of communication are important to break the cycle."

(Feedback from a panel member)

"Many of the benefits derived from volunteering could not be gained in other ways. As active citizens, people in prison can perform useful roles and, through this, find that their time in prison has meaning; they can also gain skills which should help to equip them for life after release. Working as an active citizen is challenging and rewarding – in an environment in which there tend to be very few such opportunities... Active citizenship can encourage desistance by developing the person's caring, other-centred side, building up their self-confidence and sense of independence, and focussing their thoughts on the future. These activities can also develop the prisoner's social capital; their ability to work with others and to seek support, skills that will help them after release."¹⁸

There is growing recognition of the importance of meaningful prisoner participation in fostering trust and understanding of the complaint process. The national equalities policy also advises the use of prisoner equality representatives in building confidence in the DIRF process. Yet, a meaningful prisoner equalities peer worker scheme has not been embedded nationally.

The Prisoner Complaints Policy Framework further emphasises this by suggesting regular discussions on redacted complaints within prisoner representative meetings.¹⁹

This pilot was designed by the ZMT in consultation with its trained Equality Advocates. The ZMT has seen both good and bad practice in the area of discrimination complaints and has been instrumental in monitoring the impact of DIRFs, scrutinising them externally across over 50 prisons, and advocating for equal and fair treatment of prisoners for over two decades.

The ZMT took a proactive and positive approach to demonstrate what an effective DIRF process could look like and supporting prisons in improving the investigation practice locally and nationally. The Trust's aim was to promote transparency, accountability and trust in the system, primarily among ethnic minority prisoners, particularly young adults, but also for all protected characteristic groups. The ZMT believes that The Wayland Pilot represents *what good looks like* in improving the confidence in discrimination complaints.

The ZMT has been training prisoners to take on the special responsibilities of Equality Advocates since 2021. This involves recruiting a mix group of prisoners to stand up for equality and fair treatment (and especially for the rights of those prisoners who have protected characteristics under the Equality Act 2010) in their prison. The extensive training is delivered bi-weekly over 14 weeks. They then have the privilege of work experience as an Equality Advocate in the prison and contribute to wider strategic work on equalities.



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Steps setting up The Wayland Pilot

We are outlining here the steps taken to run The Wayland Pilot. The way we got the prison ready to handle discrimination complaints, the way we went about recruiting panel members, training them in a deep understanding of DIRFs, supporting them in team-building, clarifying roles and responsibilities and introducing them to how to hold panel meetings. We summarise the way the prisoners scrutinise the discrimination complaints process and how they feed their findings up to senior leadership in the prison. We want to open-source our process so it can be adopted and adapted by other prisons.

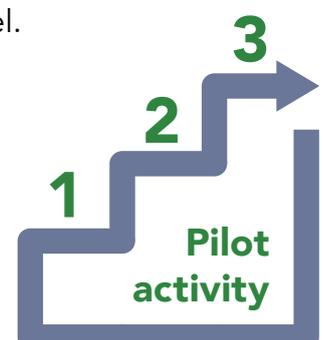
Step 1: The DIRF handling process

Getting the DIRF handling process running smoothly must come before pulling together the peer-led scrutiny panel.

- Designated and clearly signposted green DIRF boxes are installed on the units and key areas (e.g., education block). The colour green was selected on purpose to match with the green colour polo shirts worn by the Equality Advocates. Each box also has the ZMT logo as the hallmark of independent external scrutiny of DIRFs.
- On each unit, equalities notice boards are displayed and updated regularly with information about the Equality Advocates, including their photos, job description, DIRF handling process and the peer-led scrutiny panel.
- As a digital prison, HMP Wayland, made good use of technology available to prisoners by creating a bespoke equalities hub with clear information about the DIRF handling process.
- DIRF boxes emptied daily by a non-operational admin member of the equalities team.
- The Equalities admin will log the DIRF and issues an acknowledgement letter to the complainant with reference number, name of the case manager and completion date (14 days / 28 days).
- Investigations by Case Managers follow the ZMT's 'What Good Looks Like'²⁰ training model. Only the trained Case Managers receive DIRFs for investigation.
- Response letters are issued to each complainant and outcomes recorded in the log. Responses are hand delivered to the complainants, which is monitored by the D&I Lead.
- Actions and recommendations from DIRFs are logged by the equalities team and monitored regularly for patterns and themes, which are routinely discussed at the equalities meeting.
- Internal quality assurance is done by the D&I Lead and then by the Deputy Governor.
- Internal scrutiny of DIRF process is done by the peer-led scrutiny panel.
- External scrutiny is completed by the ZMT.



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Step 2: People, recruitment and training

The quality of the work to identify, recruit and train individuals on the peer-led scrutiny panel really matters. If this is not done well it risks undermining the whole process.

- The panel consists of a mixed group of five Equality Advocates trained by the ZMT and two young adult prisoners who were not familiar with the ZMT prior to joining the panel.
- Out of seven panel members, at least three were young adults (21 to 25 years old) at the time of the pilot activity.
- The panel members also represent a mixed group of white British (W1), Black British (B1), Asian (A1) and other ethnicities (O9).
- All panel members are trained in the current national policy on discrimination complaints in prisons and 'what good looks like' model of investigating DIRFs developed by the ZMT.
- The ZMT delivered 'training of trainers' session to the D&I Lead at HMP Wayland, who also received support materials for delivering local training sessions for case managers.
- Case managers (prison staff bands 5 and 6), who investigate DIRFs, received bite-size training sessions from the D&I Lead based on the ZMT's training package.
- Panel members were given terms of reference with clear roles and responsibilities.

Step 3: Panel format and frequency

This format has been very carefully thought through and iteratively amended during the pilot.

- The panel comes together every fortnight to scrutinise anonymised discrimination complaints.
- A member of the equalities team attends the meeting to provide technical assistance (without any involvement in the panel discussion).
- This two-hour meeting is led by a Chair and minuted by a Vice-Chair (both are elected by the panel). It involves discussion of individual cases that are pre-selected by the D&I team, anonymised and pored over for approach, process, quality of investigation, results and tone. Anonymising by using fake names for individuals named in the DIRFs (instead of redaction or using numbers) means that the process, though analytical, remains as human as possible. Incident details as well as the investigation notes are kept close to the original (even the writing style for authenticity)
- Panel follows the same scrutiny standards as used by the ZMT in conducting its external scrutiny. Each DIRF also receives a rag rating (red, amber, green) by the panel. Consensus on the rag rating should be reached by the Panel. If it cannot be reached, then all different opinions should be noted in the minutes.
- Detailed feedback from the panel is presented by the Chair to the senior leadership team and their peers at the regular Diversity and Inclusion Action Team (DIAT) meetings to improve the local practice and build confidence in the system. Other Panel members (especially those who are not the members of the Equalities Advocate team) are also invited to the DIAT meeting.

Actions following upheld DIRFs

One of the main challenges to confidence in the discrimination complaints system was identified as the lack of meaningful action taken following an upheld or partially upheld DIRF. If somebody has been found to have acted in a discriminatory way (unintentionally), what happens then? This is an opportunity for learning.

Within The Wayland Pilot the scrutiny panel, supported by the ZMT, designed a recommended list of options that range from restorative to disciplinary. They include:

- An apology.
- An equalities training course led by the education department.

- A cultural competence session designed by and led by the Equality Advocates*
- A mediation session led by an Equality Advocate and D&I Lead.
- Reverse mentoring (with an Equality Advocate who helps the person who has been discriminatory to learn more about their culture).
- A note added to the performance report to be discussed with their manager.

Additionally, quarterly checks by the D&I Lead that show patterns of behaviour by individuals are discussed with the Deputy Governor and the Governor.

Also, any concerning patterns of behaviour seen by the ZMT in their bi-annual or annual reviews are discussed with the Regional D&I Lead who escalates it to the Prison Group Director.



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* A cultural competence session: Connect. Communicate. Change. (CCC) was developed by the Equality Advocates in conjunction with the Diversity & Inclusion Lead over the course of the pilot. The idea was to respond to a mutual feeling between staff and prisoners of wanting to improve understanding and communication so that everyone would feel more confident being in proximity to the people around them. The vision was to help all those living and working in prisons to see themselves as part of the solution. The session is fully designed and delivered by the Equality Advocates.

4. Impact of the work of the peer-led scrutiny panel in The Wayland Pilot

This pilot was clear from the outset that it wanted to show best practice. While it managed to hold onto its high ambitions, its full potential was limited by its tight time frame. There are plenty of indications of further impact that will be generated from the maturing of the work of this pilot over time, that are not able to be evidenced in the weeks immediately following its conclusion. In the meantime, the impact that we have seen so far is both direct and indirect as described below.

“What’s the worst that could happen if everybody was treated fairly?”

(Feedback from a panel member)

Direct impact

Transparency increases trust. This new transparency of process and opportunity for insight into how people are treated in prisons makes a big difference to an untrusting population, especially young adult prisoners. As described by one of the panel members:

“I thought you would never change my mind about this but I can see that things can be done differently.”

The panel members are trained in the policy requirements and what can be and cannot be done when investigating discrimination complaints. They have better understanding of the limits of operating within the national policy parameters and how prisoners are not aware of wider policy changes having impact on local actions:

“I have learnt that prisons can only go according to their policies and what we see as fair might not always coincide with the process described in the policy. This knowledge made me to think wider than Wayland’s processes, it is about the bigger picture as much as it is about improving things here.”

Prisoners can see that the DIRF process is being carried out in the way they were told it would be. They can witness that, for instance, footage from body worn cameras has been viewed by case managers as part of the investigation into a violent incident, interviews have been held on all sides, etc. They can spread this information to their peers which serves to counter negative perceptions or rumours of injustice, and should therefore lower levels of frustration on the wings. The result is a tighter process, better understood by all those living and working in the prisons.

Bright green DIRF boxes are now visible and available in areas where prisoners can have confidential access to them, out of sight of staff as recommended by prisoners. The physical places to submit DIRFs are therefore more obvious and more discreet. D&I Lead consulted Equality Advocates about the locations of DIRF boxes which also had a direct positive impact on building confidence in the system from the outset:

“Having a say in little things like this makes a huge difference to bigger things, eventually.”

While it’s early days, it’s clear to see that the numbers of DIRFs submitted have gone up. The Panel members felt that this is owing to increased trust in the system. In 2023 the prison received a maximum of 15 in a month (it was most often 3) and yet in April this year, 33 were submitted.

This could indicate the beginnings of an increase in trust in the system. It is interesting to note this increase is in spite of the fact that the Equality Advocates have found themselves informally resolving issues on the wings (helping the wing staff but bringing down the evidenced numbers of incidents).

The D&I Lead feels that equalities and fair treatment are better known since this pilot began and that conversation around these topics have increased on the wings and around the prison. HMP Wayland is running a quarterly survey on knowledge and awareness of the DIRF system to track this over time.

Improved staff/prisoner relationships: There is a greater understanding of what prisoners have to offer. Staff commented that the men on the scrutiny panel brought "a different insight" and "raised things that as a member of staff you don't think about."

It may be too early days to be able to evidence better staff / prisoner relationships and increased trust between them. However, attitudes are already starting to change because prisoners are getting an insight into the work being done by staff. One panel member exclaimed during a scrutiny session: "I'd like to shake the hand of whoever investigated this!" Another said: "I can see the person who investigated this is human."

"It personally makes me happy that we are taking positive action to make prisoners feel better about their place in the system and the staff and managers running it. "

(Feedback from a senior leader, HMPPS)

Developing a learning culture: The panel enhances the legitimacy of the DIRF process and is knitted into the fabric of Diversity and Inclusion work.

At the monthly meeting on this subject, Governors are having conversations with panel members and working together to improve things and make changes.

The panel can see change happening because of the insights they've shared. For instance, staff checked the presentation of Halal food on different days to observe the difference in food handling across the week after feedback that observation on a single day would not show the issue.

Overall, quality of the investigations has improved significantly which is evident by more DIRFs being "rag rated" green and amber by the panel.

The DIRF external scrutiny process itself was being developed and improved over the course of the pilot as a result of feedback from the scrutiny panel. The latest version of the ZMT's 'standards of excellence'²¹ has been based on feedback from the panel.

Improved record keeping: Every DIRF is now logged, patterns are noted and themes are attended to through the escalation process. This feeds accountability and performance management processes.

The scrutiny panel is seeing a better quality of investigation with DIRFs following the ZMT training in 'What Good Looks Like'. Staff are now writing much more comprehensive notes and ensuring the complainant is clear about the process followed and the reasons for decisions and actions taken.

The power of a sense of purpose: Prisoners are feeling a sense of being part of something meaningful. A prisoner who chairs the panel said that he felt part of "making prison better". That he would have a legacy in HMP Wayland after he had left. Perhaps even in prisons more widely. It was clear there would also be a legacy for him of having been Chair of the panel both in terms of having been given responsibility and experience, but also in terms of skills building for life back in the community. In the short term, he felt involved in promoting humanity and respect and being part of helping prisons to evolve and catch up a bit with how the outside world operates.

Indirect impact

It has been heartening to note the unforeseen positive consequences that ripple out of this pilot.

There has been a secondary benefit in the immense personal growth of participants in this pilot. The panel members, including the Equality Advocates, reported feeling that the training they'd received from the ZMT would help them in their lives beyond prison, that in fact it had been really helpful in terms of their own development. One mentioned that he felt he had new skills in being able to talk in front of a group and present his point of view calmly, for instance.

Another described feeling that in general in prisons he'd been in, the levels of discriminatory goading on a daily basis meant there was a risk of frustration spilling into violence not just within the prison but on release. He explained he wanted to create an environment where people aren't being **'prodded in their cages so when the gate is unlocked a monster isn't being released.'** His visceral imagery helped paint a picture of the secondary benefits of this work. Ensuring people are treated fairly and humanely in prison has much wider connotations. There is a strong possibility this work impacts safeguarding in the community as well as inside.

The panel have been seen, by sceptical staff, to rise to the responsibility. They have been able to resolve issues outside of the DIRF process to take pressure off wing staff.

The regularity with which Equality Advocates were attending scrutiny panels raised questions from their peers on the wing. Where were they going? What were they doing? This gave the panel members the chance to explain their work and began to spread an understanding amongst their peers that staff and prisoners were working together to try to achieve something good, something meaningful.

"I have seen the impact we have on people when our team turns up on units in their green t-shirts... it is more than equalities, it is about creating safe space and giving reassurance to our peers that they have us, they have a voice."

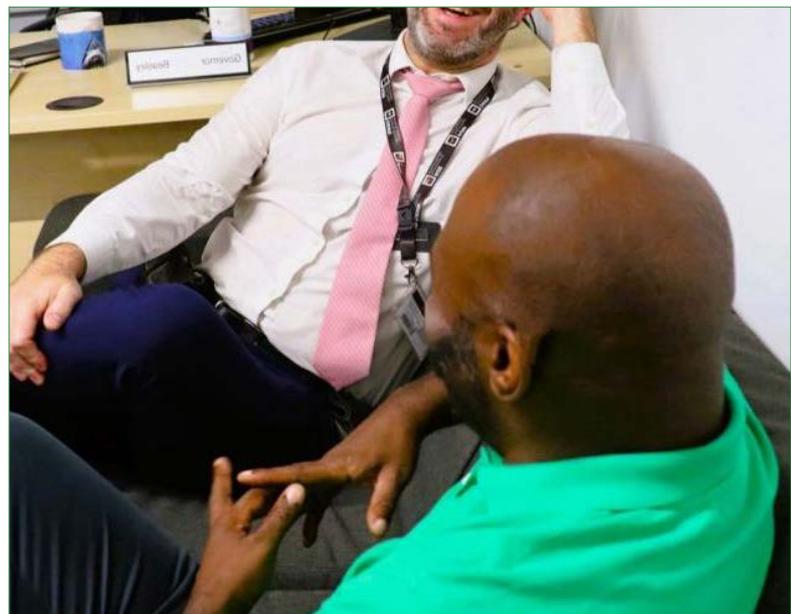
(Feedback from a panel member)

Staff development – through additional training provided by the ZMT and through feedback from the scrutiny panel – has been demonstrated by the improved quality of their DIRF investigation.

Case managers receive feedback on the quality of their investigations from the prisoner scrutiny panel via the D&I Lead. The men on the panel don't know whose DIRF investigation it is that they are scrutinising as names are anonymised. They give honest feedback against the 'standards of excellence' criteria. It was pleasing to see how delighted the case managers were on receiving good feedback from prisoners. In these cases, they attached a real importance to the expert feedback of the prisoner panel and felt proud when prisoners were happy with how they'd managed the investigation process.

"We're not trying to blur lines, we're trying to bring about positive change."

(Feedback from a panel member)



Challenges

It is interesting to note that while HMP Wayland was chosen for its open and non-defensive approach, it is at the same time, a prison with a low rate of ethnic minority representation in its staff team.

In his 2017 Review, David Lammy said,

“the culture of prisons must change, so that there is far less of a ‘them and us’ division between prison officers and BAME inmates. The greatest contribution that can be made to this is diversifying the prison workforce, including leadership teams.”²²

He made two recommendations to that effect. The recent HMIP race thematic²³ built on this to state:

“Black prisoners wanted greater staff diversity in order to foster more trust and better relationships, but the character, capability and professionalism of the individual member of staff was also seen as being of fundamental importance.”

The HMIP finding that “genuineness and professionalism cut across ethnic barriers and were the most valued staff characteristics” makes sense of what we saw in HMP Wayland’s staff. We recognise there will be challenges in other prisons that didn’t exist in Wayland with the particular staff culture and approach in that establishment.

There was some scepticism from some staff in HMP Wayland about how the panel would work. In fact, never having seen anything like this before, both staff and the panel members’ confidence was low at the start. In particular, it was very difficult to get young adults to trust the promises of change.

Young adults are the most sceptical prisoner group²⁴ and at the start it was a challenge to keep them engaged with this pilot. The way this worked in practice was through the ZMT’s determination to go the extra mile to build trust with the three young adults in the pilot. In turn, this helped them trust the ZMT, and that relationship helped build their trust in the shared vision of the ZMT and the prison in what they were trying to achieve.

The next step, on seeing ‘under the bonnet’ of how much work the case managers were putting into running good DIRF investigations as the pilot progressed, was to start to trust the prison staff. It was gratifying to see the journey the young men made from, “**nothing will change. It’s bullshit**” for the first few weeks to “**I see some of these changes happening with DIRFs now and more people want to put a DIRF rather than a complaint**” by the conclusion of the pilot only four months later.



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5. Learnings: what were the conditions that enabled the success of the pilot?

The pioneering approach taken by this pilot is at the heart of what makes it successful. There were no half measures. The pilot was established with ambition to demonstrate a gold standard: peer-led scrutiny of discrimination complaints that actually generated learning and changed the way things were done in the prison.

This was possible because of **institutional bravery and buy-in from the top**. The Prison Group Director, the Governor of HMP Wayland, the Regional D&I Lead and D&I Lead in the prison.

All of these people were not only open to the idea and up for trying to make it work, they also understood it was going to increase their workload for a bit. It was going to take some energy, problem-solving and determination to make it happen. The ZMT's co-director explained the prison was chosen because its leadership had courage and was interested in thinking "**outside the box**". She describes making a beeline for particular people because they were not prison staff who "**just wanted to tick boxes**". They were people who were prepared to battle through the challenges because of their fundamental belief that things could be better.

Resourcefulness to resolve issues: This pilot uses what is already there. It seeks to find those brilliant proactive staff like the D&I Lead, and to harness their resourcefulness and can-do attitude.

It is not hampered by the usual prison constraints of staff time and costs as it uses prisoners and upskills them to deliver the work on the scrutiny panel. It is ambitious and results-driven. Not enough green boxes for DIRFs to be easily submitted? Get them made by prisoners in a woodworking workshop.

Responsiveness to learning as it arose:

Prisoners explained that part of the reason for the low number of DIRFs submitted was because of a fear they were not confidential and may "**get into the wrong hands**". This was quelled by the idea of having combination locks on all of the DIRF boxes to which only the D&I Lead and the equalities admin staff had the code. This meant that as they moved around the prison, they could collect DIRFs without having to remember an additional key. D&I Lead's active collection of DIRFs could ensure a quick response rate, dealing with incidents at the earliest time.

Visibility: All panel members, as well as a wider group of Advocates, value such high visibility of the D&I: "**if you are in Wayland and you do not know who Amy Wilford is, you need to ask yourself if you really are in Wayland!**" This has a massive positive impact on the visibility of the overall equalities work, and indirectly impacts on the confidence amongst prisoners that "**this work actually happens, rather than talked about..**"

The quality of the cultural competence training designed by the Equality Advocates within the CCC* initiative was of huge value to the prisoners and staff that attended it. It had made them see themselves and the world differently, and respond to their situation with a different mindset. The value of good, thoughtful, interactive, in person training was clearly seismic.

What it offers to staff, as opposed to online training, is being able to bring and discuss real examples. More than the content, how the training is delivered, how the space is held for people to bring vulnerabilities and questions so that real learning can take place, is critical. Identities, feelings, fears, judgement, ignorance, bias are all brought to the table in such a way that trust is built through a shared humanity.

This way, a learning culture can begin to germinate in the prison and push its green shoots through from that room into the wider prison community.

Constructive relationships with external partners, which stem from mutual respect for impartiality and expertise, was essential for the success of the project from the start. There was no confusion about the role the ZMT, as an independent organisation, plays in this project and at HMP Wayland.



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“ZMT must take credit for their advice, guidance and patience. They are an excellent partner to improve diversity and inclusion within the Prison estate. I would absolutely recommend them, the DIRF pilot and mentor training to any other prison.”

(Feedback from a senior leader, HMPPS)

“The fact that ZMT is involved is paramount to its success. With the involvement of an external and independent body it provides credibility and trust as it is not being solely addressed in house therefore accountability is applied both from prisoner and establishment alike.”

(Feedback from a panel member)

It is possible to commit to equalities and fair treatment and, critically, to cultivate a non-defensive learning environment without having to fully replicate The Wayland Pilot. Different prisons hold different populations, and a transient population can make it difficult if not impossible to roll out the exact model.

The ZMT acknowledges that a certain level of modification and adjustment to local realities (e.g. local remand prisons) and resource implications (e.g. having no dedicated band 6 Diversity & Inclusion Leads in place) will be necessary in some cases.

The ZMT is delighted to work with prisons that understand the value of seeking to integrate this model as far as they can, and is willing to support prisons to adopt and adapt The Wayland Pilot in a way that works for them.

6. Conclusion and recommendations

The Wayland Pilot puts human beings at the heart of the process, rather than process at the heart of the process.

"It makes us feel respected and heard when we see a well investigated DIRF. The impact of the complaint being dealt with respectfully is widespread across the establishment not just the complainant but also to the wider community. The complainant will have felt that his voice led to a resolution of his problem. Even if his complaint wasn't upheld, it will have been respectfully declined with an explanation of findings... this will in turn reassure the trust in the process. The impact for the wider prison is that of promoting a safe and fair environment."

(Feedback from a panel member)

One of the ways a prison could talk itself out of running a peer-led scrutiny panel for DIRFs is to argue that unless there is already a culture of fairness, the methodology is not going to get traction. A fundamental principles of transparency and accountability need to be there already. This mindset will mean nothing changes. In fact, it's the other way round. The change in culture follows the change in the way things are done; going through the steps of making the DIRF system work in a meaningful way promotes equalities and drives a culture of learning.

This pilot has sown the seeds of a much bigger change, after Myron's Maxim²⁵ of 'start anywhere, follow it everywhere'. Culture change is too big a beast to attempt unless you start with one thing. That one thing being the open and transparent scrutiny of the discrimination complaint process seems like a very good place to start. The spin off good practice of the cultural competence training will no doubt have brilliant repercussions of its own, and that is only one of the ways that this pilot is generating new creative good practice – there is much good that can come about over the next few years.

Prisons should be places of change. Places where people can change their behaviour and their relationship with society in order to live law-abiding lives in the community on release. It could be argued that it is impossible for prison environments to inspire this change when they are so set and stuck in their ways and when the daylight of external scrutiny of process so rarely permeates the walls. If they were dynamic learning organisations, they'd be far more likely to reduce reoffending as well as being safer and more inspiring. This pilot is a good start.

The pilot shows that centering diversity and inclusion in the design of prison systems results in fairness from a protected characteristics perspective and leads to less problematic behaviour. It also shows that the self-awareness generated by equalities work can help people move away from pro-criminal behaviours.

"In essence, it has helped people reform themselves as it has helped the system and staff therein be more Inclusive."

(Feedback from a senior leader, HMPPS)

The HMIP race thematic highlights the value seen by both staff and prisoners of 'measures... intended to create opportunities for respectful communication and the development of mutual understanding' as critical to culture change. The Wayland Pilot provides one such practical opportunity.

This pilot comes at a very good time since the direction of travel in terms of what can be achieved in prisons must surely be in peer-led work. The fact the prisoner population is soaring and the staffing crisis continues means at the very least it is sensible to build capacity and capability in prisoners when it cannot be found elsewhere.

Through the pioneering The Wayland Pilot, there are strong indications that peer-led scrutiny panels can increase trust in the DIRF process and have profound value throughout the prison and beyond.

"Before, I had no trust. I had used the DIRF process before and felt overlooked and ignored. Since the pilot my trust has grown. I have belief in the system and know that it is a working process. Being involved directly in the panel has allowed me to see positive direction and neutrality since training was rolled out."

(Feedback from a panel member)

With some notable exceptions, the discrimination complaints system is not working well for prisoners or prison staff in many places across England and Wales. This systemic failure feeds into a wider culture of mistrust and volatility in the prisons. Managing that then keeps staff in firefighting mode, further away from being able to support rehabilitation because they are dealing with the pre-eminent concern of safety. Since the DIRF system is widely used by ethnic minority prisoners, the failure of operating a fair discrimination complaints system further widens the gap between ethnic minority prisoners and the system.

This pilot demonstrates that the discrimination complaints system can work well. It is exciting that this has the potential for real culture change in the prisons it works well within.

It has been a short pilot and operating in a prison with a positive approach and yet it has been possible to describe the necessary conditions for such a panel to succeed in other prisons. The potential for more such panels to be rolled out is clear and the benefits could be felt in prisons across the estate. Benefits for staff, prisoners, prison culture and wider community.

Through The Wayland Pilot the ZMT demonstrated something that other prisons can adopt. It is doable, efficient and impactful even without a significant funding investment.

What is the potential of this pilot?

1. to act as a model for other prisons to implement
2. to generate trust and confidence in the discrimination complaints system
3. to build trust and confidence in the prison and the wider system
4. to upskill both prisoners and staff
5. to promote empathy and positive staff-prisoner relationships
6. to support rehabilitation
7. to help staff feel they are doing meaningful work
8. to make prison safer
9. to make communities safer.

"The Wayland Pilot has gone beyond – way beyond - expectations to help promote fairness and self-awareness and through this will have led to rehabilitation and redemption."

(Feedback from a senior leader, HMPPS)

"Initially when I volunteered to be on the prisoner led scrutiny panel, I was apprehensive of the authenticity and impact it would have (if any). However, since then I am extremely proud of the work that we have done as a collective and grateful for the support of the D&I Team and senior leaders. We have been given the opportunity to not only scrutinise the processes but additionally to feedback monthly at the Diversity & Inclusion Action Plan meeting to Senior leaders and middle managers. This is an innovation that has transformed the way in which prisoners are given a voice in custody."

(Feedback from a panel member)

Recommendations for generating trust and confidence in the discrimination complaints system

1. Institutional Bravery:

We have seen courageous leadership at HMP Wayland, where the team from Prison Group Director and Governor level down are seeking to create a genuine learning culture and to put prisoners at the heart of the solution.

A courageous leadership which prioritises fair treatment and models belief in the value of the DIRF system will set the tone across the organisation. This is what it takes to achieve something this powerful.

Recommendation: To make 'prisoner confidence in the DIRF system' part of a prison performance measure. Ensuring prisoners are regularly surveyed on this.

2. Authentic Voice:

The widespread knowledge that meaningful involvement of people with lived and learned experience is critical to creating better systems is endorsed in this pilot. Staff and prisoners working together and the elevation of the prisoner voice at leadership level, builds confidence in the DIRF system across the establishment.

Recommendation: To implement effective peer-led panels to scrutinise the discrimination complaints system across the prison estate. Ensure prisoners, particularly young adults, feel empowered, trained, and supported to voice their concerns around discrimination in a constructive and meaningful way.

3. Trustworthy Independence:

The ZMT – with its reputation for integrity, expertise and dedication to race equality – has provided external scrutiny and dedicated support to this pilot. Its value – to prisoners and prison staff – is in demonstrating the prison is being independently held accountable for its commitment to fair treatment and inclusion by an organisation that cares deeply about improving this area.

Recommendation: A trusted, independent and experienced external partner must be in place to provide impartial expert feedback to Governors. This will ensure the credibility of the discrimination complaints system.

These three recommendations represent three lines of accountability. We recommend that prison leadership is held accountable by measurable targets for its implementation of an effective discrimination complaints system. This will show its commitment to fair treatment and race equality in prisons.

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