



National Offender  
Management Service

# The National Offender Management Service

## Equality Strategy 2015 - 2017

*Delivering Better Outcomes for Everyone*

# Foreword



The offenders in our care or under our supervision and the staff in our organisation are entitled to fair, transparent and equitable treatment. Equality and diversity are central and integral to all business activities within the National Offender Management Service (NOMS).

The Equality Act 2010 places specific duties on NOMS, but we must ensure equal treatment in an inclusive environment not just because the law requires it but because it is the right thing to do. Improving outcomes for minority groups is essential to creating a healthy, inclusive and open organisation committed to making a difference for society. Our work protecting the public and preventing victims is vitally important, but we have a complex agenda to deliver successfully. How we treat offenders can make a huge difference in helping them to turn their lives around and make sure our work is successful and

how we treat fellow staff will inevitably have an impact on attitudes towards offenders.

We have made huge improvements over the last 10 years, both in terms of the diversity of staff we employ and in our openness and willingness to embrace difference. We work with a wide range of partner organisations bringing a breadth of diverse talent to support our work, and we have benefited hugely from this approach. There has also been significant cultural change across the whole organisation, where unacceptable behaviour and discrimination has been increasingly challenged and tackled. As a result, our organisation is a better place to work, but it is not perfect, so we continue to challenge and tackle unfairness and discrimination wherever it exists.

Recent data have been analysed from which it has been possible to identify and determine where we need to prioritise action to achieve improvements. We intend to refocus activity through the launch of this Equality Strategy, which aims to deliver better outcomes for everyone. The positive outcomes will be achieved over the period through implementing our Equality Delivery Plan, summarised in Section 4.

A recently created Agency Sub Committee, chaired by a Non Executive member of the NOMS Agency Board, provides strategic oversight of equality activity, drives performance, and monitors delivery of the further improvements we believe are possible within NOMS. We intend to achieve these aims by setting and delivering clear goals to maintain and uphold our absolute commitment to fairness, opportunity and respect. Through this approach, we will continue to deliver better outcomes for everyone.

Michael Spurr  
NOMS Chief Executive Officer

# Contents

	<b>Page</b>
<b><u>Section 1 - The Principles of Equality for NOMS</u></b>	<b>1</b>
▪ Our Duty	1
▪ Our Obligations	2
▪ Our Priorities	3
<b><u>Section 2 - The Strategic Equality Objectives</u></b>	<b>4</b>
▪ Our Strategic Objectives	4
▪ Better Outcomes for Staff	4
▪ Better Outcomes for Service Users	6
<b><u>Section 3 - The Organisational Context</u></b>	<b>9</b>
▪ Improved Data and Monitoring	9
▪ Achieving Improved Outcomes	9
▪ Communication and Training	9
▪ Staff Networks	10
▪ Governance Arrangements	10
<b><u>Section 4 - The Equality Delivery Plan</u></b>	<b>11</b>
▪ Theme A – our staff	11
▪ Theme B – prisoners and offenders	12
▪ Theme C – whole system	14

## Section 1 – The Principles of Equality for NOMS

1. The National Offender Management Service (NOMS) is an Executive Agency of the Ministry of Justice. Our role is to commission and provide offender management services in the community and in custody ensuring best value for money from public resources. We work to protect the public and reduce reoffending by delivering the punishment and orders of the courts and supporting rehabilitation by helping offenders to reform their lives.
2. NOMS is committed to being a high-performing organisation. We seek to apply the same standards of continuous improvement to ourselves that we expect of others.
3. We want to deliver better outcomes for our staff and offenders by:
  - Incorporating equality and diversity in all we do
  - Valuing, empowering and supporting staff and working collaboratively with others
  - Treating offenders with decency and respect
  - Promoting equality, diversity and inclusion
  - Putting people at the centre of our work
  - Having an open and accessible culture

### Our Duty

4. We have a legal duty to deliver our services in line with the provisions of the Equality Act 2010. This widened the scope of equality legislation by protecting the characteristics of:
  - Age
  - Disability
  - Gender reassignment
  - Marriage and Civil Partnership
  - Pregnancy and Maternity
  - Race
  - Religion or Belief
  - Sex
  - Sexual Orientation
5. It places a further duty on public sector organisations to have ‘due regard to the need to:
  - Eliminate discrimination, harassment and victimisation
  - Advance equality of opportunity; and
  - Foster good relations between persons who share a relevant protected characteristic and those who do not share it.’
6. This is known as the Public Sector Equality Duty (hereafter referred to as the PSED).
7. Because family contact and relationships are important in the rehabilitative context, we also consider the impact of our activity on the families of prisoners and offenders in the community.

## **Our Obligations**

8. We publish this report as part of our duty under the Equality Act 2010. We believe, however, that promoting equality and demonstrating a firm commitment to encourage and enable change is more than a duty, it is at the centre of our purpose. Each of us has a contribution to make in achieving our organization's equality objectives. The Equality Strategy employs, therefore, a 'whole system' approach, which reflects that shared commitment.
9. Our equality objectives have been reviewed and expanded to reflect our new responsibilities under Transforming Rehabilitation. This has enabled us to focus on outstanding areas for development and improvement and ensure our objectives align with NOMS' overall business strategy.
10. NOMS will adhere fully to its responsibilities under the PSED, outlined above.
11. Our Equality Strategy aims to deliver these outcomes. It indicates how we will continue to embed equality considerations into business as usual. We aim to do this in a proportionate way and believe that enhancing understanding of the impact of our work in society, by protecting the public and preventing victims, will help us focus on our essential roles and better understand our differences. NOMS will work as a whole organization and where appropriate with statutory partners to advance equality in everything we do.
12. With the major change programme brought about by Transforming Rehabilitation, NOMS now inherits the Equality Duty that formerly sat with the Probation Trusts. NOMS will demonstrate how it is meeting that duty in the supervision of offenders in the community and in how staff employed within the National Probation Service (NPS) are treated. Community Rehabilitation Companies (CRCs) are responsible for complying with the PSED in the execution of their public duties but NOMS is accountable for monitoring adherence to it and for the PSED within contract management.

## **Our Successes**

13. As part of the reforms, there was a need to create an equality infrastructure to encompass offenders managed in the community and staff formerly employed by Probation Trusts. To achieve this, NOMS developed a Probation Equality Model, a NPS Equality and Diversity Plan, and a CRC contract management equality framework. These products lay the foundations and define the structures for these new, important areas of work for NOMS, and contribute to economies of scale. They sit beneath and strengthen the overarching NOMS Equality Strategy.
14. Data collection for prisoners and for offenders in the community remains a key priority for NOMS. We have completed a two-year project to increase self declaration rates amongst prisoners. On completion of the project, declaration rates had increased to over 80% for the protected characteristics of age, disability, race, religion or belief, and sexual orientation. The increase in data enables us to monitor more effectively our equality performance at key stages.
15. To capture equality data from the first point of contact, we have introduced a national Equality Information Form. It is mandated for use at Court, at the stage of pre-sentence report preparation. The information sought via the form is comprehensive. This mandated process will enable us to track the offender journey from the start, whatever sentence the Court imposes.

## Our Priorities

16. Our priorities include the need to better understand the challenges within our complex organisation and strengthen plans for improvement. This will be achieved through a model to suit the reformed organization and new ways of working. To achieve this we will:
- Continue to embed our understanding of the PSED as a routine part of our business, through improved engagement and increased awareness raising
  - Review and further develop our understanding of disparities in experience or access to services and how these might reasonably be addressed
  - Work to ensure that our workforce at all levels better reflects the diversity of the society it serves
  - Seek all opportunities to reduce inappropriately disproportionate outcomes to create a better organization for everyone

## Section 2 – The Strategic Equality Objectives

### Our Strategic Objectives

17. We have identified 5 Strategic Equality objectives for NOMS, which read across and underpin those captured within the Ministry of Justice overarching Equality Strategy. These objectives are in order of priority based on evidence from monitoring data and/or stakeholder feedback.

Objective	Aim
1. To continue to embed our understanding of the PSED as a routine part of departmental business.	A reduction in inappropriately disproportionate outcomes  Increased awareness of PSED obligations
2. To review and further develop understanding of disparities in experience or access to services and how these might reasonably be addressed.	Fair Treatment and Equal Access  (All offenders with protected characteristics)
3. To work to ensure that our workforce at all levels better reflects the diversity of the society it serves and empowers all staff to succeed.	Improved representation in the workplace
4. To better understand the experience of disabled staff in NOMS, and work to address the gap in levels of engagement between disabled and non-disabled staff.	Address relative disengagement of disabled staff and seek improvement
5. To ensure that NOMS continues to identify the particular needs of disabled service users and takes action to meet these wherever reasonable and possible.	Understand the needs of disabled prisoners and offenders and ensure obligations are effectively met.

18. NOMS is committed to re-energising the equality agenda and has planned an extensive programme of work over the next three years.
19. We intend to improve our current performance and further minimise the risk of inappropriately disproportionate outcomes for staff, prisoners, and offenders in the community by using the methods and interventions described in the NOMS Equality Delivery Plan (Section 4).

### Better Outcomes for Staff

20. Ensuring equality brings a number of significant benefits, both complex and fundamental in any organisation. By making the necessary reasonable adjustments and being open and inclusive to all our staff we will increase engagement, improve effectiveness, and create a greater sense of pride and belonging. This will strengthen our capability as a workforce, reduce absenteeism, and serve to improve our recruitment and retention rates.
21. In NOMS, we have a good track record of providing opportunities for career development. Progression for women across the Service has improved in recent years. In London 25% of staff are from minority ethnic communities. However, recruiting Black, Asian and Minority Ethnic (BAME) staff and having a

representative staff group across other parts of England and Wales remains a challenge. The nature of our work means that we must strive to achieve a workforce that reflects wider society and are committed to achieving this wherever possible. Once BAME staff are further encouraged to consider NOMS as an attractive employer, we then need to build confidence that the working environment offers a level playing field, where all staff are treated with equal respect and commitment from their managers.

22. Progression for our BAME staff has not yet matched the progress made by women, which is why programmes that provide development opportunities for BAME and disabled staff, such as Accelerate, are important. We will continue to support and promote these types of approach.
23. We have implemented Fair and Sustainable reforms in prisons, which support equal pay and progression for staff across all grades. We have a workforce strategy that provides senior managers with the skills they need to address gaps in their learning and development. This is also focused on HQ where we are strengthening development opportunities for staff wanting to be part of the Senior Civil Service. Our talent management practices are regularly reviewed and we work in close conjunction with the MoJ Talent Team.
24. Through implementation of the Fair & Sustainable reforms we have been able to mitigate equal pay risk amongst our staff groups and through the new job evaluation scheme, ensure fairness and equality across jobs. Any job undertaken below the Senior Civil Service within NOMS is evaluated and agreed against a set of criteria, to ensure consistency and transparency, preventing the creation of ad hoc jobs that do not fit the structure.
25. Talent Management systems are being developed to ensure they will capture and track organisation better assessment of and planning for the emergence of future talented individuals from a wider pool of people, using a more inclusive definition of what talent looks like and where it can be found. This is discussed monthly by the NOMS Executive Management Committee.
26. In terms of recruitment, we provide unconscious bias training and encourage staff to undertake this when acting as members of staff selection panels.
27. We want to improve the confidence of staff to declare all their protected characteristics, as a significant proportion of our workforce have not yet shared this information. We hope that plans contained within our refreshed approach, achieved through delivery of our Equality Plan, will address this.
28. Historically, other staff declaration rates have shown differences in outcome for NOMS HQ (other than NPS) and prison staff according to race, disability and sex. Current data tell us:
  - BAME staff are less likely to get an exceeded/outstanding annual appraisal marking than non BAME staff and more likely to state they have experienced bullying and/or harassment (Staff Engagement Survey 2013).
  - BAME graduates are less likely to apply for the NOMS Graduate programme and be successful.
  - More disabled staff reported experiencing bullying and harassment than non-disabled staff (Staff Engagement Survey 2013).
  - Fewer male staff achieved exceeded/outstanding annual appraisal markings than female staff

29. We are increasing our evidence base to better understand the causes of unfairly disproportionate outcomes for staff. Improved staff data collection will enable us to develop clearer guidance for managers to foster, develop and respond to a diverse staff group, particularly in relation to the appraisal process.

### **Better Outcomes for Service Users**

30. By decreasing disproportionality experienced by service users (prisoners, victims, offenders in the community and their families) we are creating a more inclusive environment that improves the legitimacy of regimes, services and rehabilitative intervention from their perspective. It could increase openness, reduce the potential for frustration or anger and consequent violence or disorder and lead to improved engagement with and commitment to their own rehabilitation.
31. The Young Review (December 2014) brought into sharp focus the need to improve outcomes for young black and/or Muslim men in the Criminal Justice System and highlighted ways in which this could be achieved. The Review made a series of recommendations, which are reflected in the actions within our Delivery Plan. The Review emphasised the importance of the 'service user voice' to inform and shape an inclusive environment, in which a diversity of offenders can invest in a process of change.
32. Historically, the Probation Service has sought pro-actively to address equality. The Transforming Rehabilitation reforms both introduced further positive ways to deliver an inclusive service and generated new equality challenges that we will mitigate and monitor. For example, the increase in practitioner discretion with an associated potential for unconscious/implicit bias, and assessment and allocation now taking place immediately post sentence.
33. We have introduced safeguards to promote clear assessment and reduce the risk of bias. The Risk of Serious Recidivism (RSR) Tool, used at the point of allocation at court, serves to regulate the assessment process and base judgments on factual information. Recognising the significance of sentencing decisions to an offender's rehabilitation, we are committed to providing impartial pre-sentence advice to Courts.
34. Pre-reform, each of the 35 former Probation Trusts was responsible under the Equality Act 2010 for meeting the PSED. Retrospective national data is, therefore, limited and not easily cross-referenced to reach reliable conclusions. It is, however, possible to highlight the following points, taken directly from the NOMS Offender Equalities Annual Report 2013/14 (published November 2014):
  - Female offenders have a significantly higher percentage of successful completions of community orders and post release licence than male offenders (95.0% for females and 75.8% for male offenders). The gender difference has increased since 2012/13 when there were 78.9% of successful completions for female offenders and 76.7% for male offenders.
  - Successful completions of community orders and post release licence were higher than average for offenders from the Asian or Asian British (83.3%), Black or Black British (80.5%) and Chinese or Other ethnic group (77.6%), which is consistent with the previous year.

- The percentage of successful completions increased with age. In 2013/14 the highest percentage of successful completions was in those aged 60 and over (92.4%), with those aged 50-59 also above average at 88.8% and those aged 40-49 at 82.2%. Successful completions were broadly similar to average for those aged 18-39, but 15-17 year olds were considerably lower at 43.8%. This pattern of increasing percentages of successful completions with increasing age is consistent with 2012/13.
35. Turning to the custodial setting, the prison Equality Monitoring Tool (EMT), launched in 2014, indicates that whilst NOMS already delivers a number of interventions targeting specific minority groups, there are statistically significant differences in outcomes for prisoners according to race, religion or belief, age, disability and sexual orientation.
36. Data from the EMT and other sources analysed at establishment, regional and national level suggests:
- Black prisoners are over-represented in the High Security Estate (HSE); are more likely to be in segregation units and have force used against them; and are more likely to be on the basic (lowest) level of the Incentives and Earned Privileges (IEP) Scheme.
  - In HMCIP surveys, BAME prisoners report significantly poorer responses than non BAME prisoners regarding their treatment by staff.
  - Muslim prisoners are more likely to have force used against them than non-Muslim prisoners. In HMCIP surveys, Muslim prisoners report significantly worse responses when asked about ease of access to health services and also receive a disproportionate number of negative case notes on the prisoner record system, P-NOMIS, compared to other groups.
  - Prisoners aged 18 -20 years are more likely to have an adjudication charge; a proven adjudication; are more likely to be on the basic level of the IEP Scheme; and have force used against them.
  - Prisoners with a disability are more likely to have an adjudication charge and proven adjudication; more likely to be on the basic level of the IEP Scheme; more likely to be in segregation; and more likely to have force used against them. They are also less likely to be granted Release on Temporary Licence (RoTL).
37. Historically the majority of prisoners have refused to declare their sexual orientation but we now have over 80% of prisoners declaring their sexual orientation. Through this data we have 1.1% of prisoners identifying as gay or lesbian, 1.2% bisexual and 86.1% as heterosexual. We will continue to monitor the outcomes for these groups and take action where necessary to address any areas of disproportionality identified.
38. We have created a structure to capture data from the first point of contact, at court, to now include and report on equality data at key stages in the offender journey in the community. These stages are represented as a subset of measures within the NPS performance framework and form part of our NOMS' wide data pack. These new metrics will help us to gauge equality of outcome at different stages, starting with the sentencing recommendation made by NPS staff at Court and including risk escalation, recall and breach.

39. As well as statistical data, we are committed to seeking equality-related feedback from offenders in custody and on community orders. This type of information will enable us to develop a more sophisticated understanding of the offender experience, particularly that of those from minority communities, and shed light on areas not amenable to statistical analysis.
40. Prisoners' overall experiences and outcomes are influenced by their experience of services commissioned by our partners including health, education and local authority services. For example, prisoners with disabilities are expected to benefit from Care and Support Services commissioned by local authorities following implementation of the Care Act in England in April 2015, with the Social Services and Wellbeing (Wales) Act due for implementation in Wales from 2016.
41. We also need to consider wider service user needs, our responsibilities towards victims and the public, offenders' families, and those who visit or in other ways interact with our services. We will routinely apply The Family Test<sup>1</sup> in developing new policies and ways of working. NOMS has a direct responsibility towards victims of Schedule 15 offences<sup>2</sup>. We will continue to improve our engagement with this diverse cohort of individuals and deliver a service responsive to them.

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<sup>1</sup> A new Government-led initiative designed to introduce a family perspective to the policy making process and ensure that policy makers recognise and make explicit the potential impacts on family relationships in the process of developing and agreeing new policy.

<sup>2</sup> Specified offences are listed under Schedule 15 to the Criminal Justice Act 2003 (sexual, violent and terrorist offences that meet defined criteria for seriousness).

## **Section 3 - The Organisational Context**

### **Improved Data and Monitoring**

42. As a consequence of the Transforming Rehabilitation reforms, 9,000 new staff have joined NOMS from the Probation Service to create the National Probation Service (NPS). This major transformational change presents opportunities, such as learning from former positive practices in probation, and presents fresh goals to ensure we maintain and uphold our absolute commitment to fairness and respect in all delivery environments.
43. Apart from sex and age, data on protected characteristics declared by Probation staff to their former employers could not be transferred to the NPS. This means that one of our biggest challenges is tackling the absence of data relating to staff protected characteristics. This information will then inform workforce planning and recruitment strategies and - alongside offender data - identify and mitigate against any equality risks that might otherwise result from Transforming Rehabilitation.
44. There has been a notable improvement in the analysis and understanding of prisoner equalities issues. Since the introduction of the EMT we have been able to better analyse specific equality outcomes for all prisoners including women. Early analysis of the data shows that many of the race inequality outcomes we see for male prisoners are not present for female prisoners. We need to understand why, and - where appropriate - learn lessons from the female estate.
45. We are introducing clear equality performance measures across the offender journeys, including the new processes and structures for managing offenders in the community. We will measure success against this approach, consider the emerging findings from our short term interventions, the monitoring of data from the EMT and other sources to adapt and define our future priorities.

### **Achieving Improved Outcomes**

46. Over the period we will measure progress using the EMT and our HR administrative system (Phoenix) and other sources, to identify if we are successful in achieving improvements under the delivery objectives in Section 4. The results of this analysis will be used in a feed back loop to achieve continuous improvement.

### **Communication and Training**

47. We will ensure that core training for staff embeds equality within it. We have developed training products that address unconscious bias and tailor that learning to the jobs people do within the organization. We are particularly focused on the importance of objectivity in pre sentence reports prepared by NPS staff.
48. NOMS Contract Managers are committed to ongoing, rigorous monitoring of the equality criteria within CRC contract arrangements throughout the lifetime of the contract.
49. Prior to the organizational restructure, we provided dedicated training to those responsible for co-coordinating equality in prisons. We recognise that all establishment staff need to be properly trained to support effective delivery in their prisons. We will, therefore, update training for those staff responsible for co-coordinating equality in prisons.

50. The planned enhancement of training will be further supported by regular communication and briefing material targeted to specific groups of staff. Additionally, regular organizational learning events raise awareness of specific issues, share best practice and ensure proactive leadership in areas where change is required in a more dynamic way.

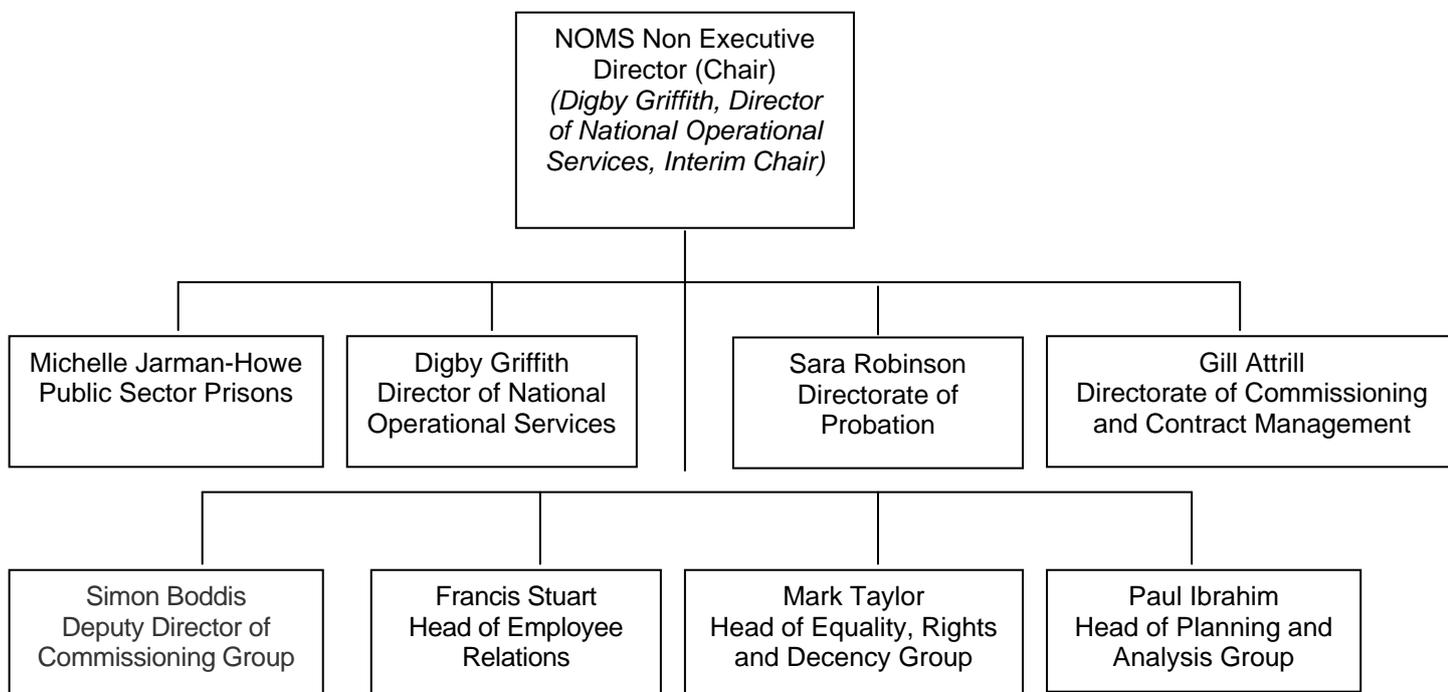
### Staff Networks

51. The Staff Network and Association structures for NOMS, including the Prison Service, the Probation Service and Headquarters, were reviewed in June 2014.
52. The review examined the current work objectives, role and function of the Networks and Associations and recommended options to enhance their effectiveness. The review considered ways to improve governance arrangements, create a structure that provides staff with a collective voice, and enables Associations and Networks to contribute to achieving our equality objectives. Detailed engagement on the preferred approach to achieve the identified improvements is ongoing and reformed structures will be implemented during 2015.

### Governance Arrangements

53. Governance for delivery of the Equality Plan within NOMS is with the Equality Sub-Committee of the NOMS Executive Management Committee (NEMC). The Committee membership comprises of senior officials with key lead areas of responsibility in ensuring that we are able to meet our PSED. The structure is outlined below.

#### The NOMS Equality Sub-Committee



54. We cannot deliver equality in isolation and it is recognised that delivery partners have an important role to play in supporting us to deliver fair and equitable

services to offenders. It is essential that we ensure that services that are procured from or delivered in partnership with other organisations are received in a way that is consistent with our legal responsibility under the PSED.

## Section 4 - The Equality Delivery Plan

### THEME A. OUR STAFF

	What we want to achieve	What action NOMS will take	Timescale
A 1	Improve data collection on staff. Monitor and analyse outcomes for staff across all protected characteristics to influence workforce planning and recruitment campaigns and generate a more diverse workforce, including at senior level	<ul style="list-style-type: none"> <li>Develop greater understanding of the reasons for lack of declaration by staff.</li> <li>Establish workforce data for the NPS, to replenish information about staff</li> <li>Develop a method to gauge outcomes for staff across all protected characteristics</li> <li>Establish, analyse and report on the NPS workforce in relation to protected characteristics to identify and learn from any disparity in outcomes for NPS and wider NOMS staff</li> </ul>	April 2016
A 2	Provide a high quality and responsive staff network structure, providing a service for all of the protected characteristics	<ul style="list-style-type: none"> <li>Implement the Staff Networks/Associations Review recommendations.</li> </ul>	December 2015 – March 2016
A 3	Refresh Prison Service Instruction on Equal Treatment for staff (33/2011). Develop a Joint Instruction. Introduce guidance to integrate Equality Analysis into policy development and as standard practice.	<ul style="list-style-type: none"> <li>Revise the audit process to better reflect the needs of the organisation</li> <li>Measure compliance with the policies through the audit process</li> <li>Review the findings and introduce improvements.</li> <li>Ensure effective transition from Equality Impact Assessments (EIAs) to Equality Analysis.</li> <li>Establish and maintain a national database to monitor adherence to Equality Analysis for all national policies (<i>full details in section C3</i>)</li> </ul>	January 2016
A 4	Develop a clear plan for ensuring staff who use assistive technology or require reasonable adjustments can be enabled to perform and thrive	<ul style="list-style-type: none"> <li>Define and make operational a pathway to providing reasonable adjustments, identifying key responsibilities at each stage of the process. Introduce a series of measures to gauge and continually improve outcomes.</li> </ul>	December 2015
A 5	Train staff responsible for the strategic delivery of equality in prisons and the community	<ul style="list-style-type: none"> <li>Identify correct platform to suit the learning need</li> <li>Design the learning package</li> <li>Implement the learning package</li> </ul>	May 2017
A 6	Address disparity in number of investigations of BAME staff compared to white staff	<ul style="list-style-type: none"> <li>Commission an internal research project</li> <li>Disseminate learning to all staff and undertake continued evaluation of outcomes.</li> </ul>	July 2016
A 7	Investigate disproportionate appraisal markings for BAME staff	<ul style="list-style-type: none"> <li>Engage with the wider Civil Service and ensure NOMS is an active partner in the wider government research being done on this issue.</li> <li>Introduce a series of actions that will combine to reduce disproportionality.</li> <li>Continually monitor outcomes (through mid year and end of year appraisal marks) and review interventions.</li> </ul>	May 2017

A 8	Create inclusive physical and social workplace cultures, experienced as positive and enabling by all staff	<ul style="list-style-type: none"> <li>Demonstrate awareness of the PSED in routine activities that contribute to the culture of the workplace and the experiences of staff and adhere to the social model of disability, such as visual images that reflect a diverse society as part of a wider programme of change</li> </ul>	April 2017
A9	Develop actions to create a more inclusive workforce with a stronger expression of diversity at middle manager and senior manager grade	<ul style="list-style-type: none"> <li>Develop local actions through HR processes in Establishments and Local Delivery Units based on continued monitoring</li> </ul>	December 2015
A 10	Build in plans for better representation of male staff in the NPS workforce	<ul style="list-style-type: none"> <li>Through Equality Analysis, to develop strategies to attract men to the profession to include learning from other professions such as teaching and nursing and to promote to male staff already in NOMS</li> </ul>	July 2017

### THEME B. PRISONERS AND OFFENDERS

	What we want to achieve	What action we will take	Timescale
B 1	Address why black, mixed race and Muslim prisoners have worse outcomes for adjudications, segregation, use of force, complaints and Release on Temporary License.	<ul style="list-style-type: none"> <li>Research possible reasons for disproportionality, identifying how often bias may be a factor in decision-making</li> <li>Implement a series of proactive systemic measures based on current knowledge</li> <li>Drawing on research outcomes, pilot an intervention and evaluate it</li> </ul>	April 2017
B 2	Evaluate the pilot interventions for disproportionality to inform the tools which are developed, in order to roll out nationally	<ul style="list-style-type: none"> <li>Evaluate the outcomes from the pilot interventions to determine whether the tools are rolled out nationally</li> </ul>	Ongoing
B 3	Improve compliance with the PSED by reviewing the a) Prison Service Instruction 32/2011 Ensuring Equality and b) Prison Service Instruction 07/2011 Care and Management of Transsexual Prisoners and creating a Prison and Probation Instruction (joint instruction) that will include defining practice and legal responsibilities in the safe management of trans offenders in the community	<ul style="list-style-type: none"> <li>Conduct consultation on the current Instructions</li> <li>Write and publish revised Prison and Probation Instructions and practitioner guidance</li> <li>Gather service user and practitioner feedback to help inform best practice.</li> <li>Consult NOMS Legal Directorate to inform Probation Instruction</li> <li>Review the audit process for all Instructions to ensure compliance and governance.</li> <li>Ensure adherence to Equality Analysis for all local policies and practices (<i>full details in section C3</i>)</li> </ul>	January 2016  December 2015  Ongoing
B 4	Investigate reasons for disproportionate outcomes for disabled prisoners and offenders	<ul style="list-style-type: none"> <li>Investigate disproportionality.</li> <li>Pilot an intervention</li> <li>Evaluate pilot</li> <li>Roll out appropriate guidance</li> <li>Ensure Care and Support is available from Local Authority Services</li> </ul>	Ongoing
B 5	Undertake research into the extent to which earlier contact with the Criminal Justice System inform behaviours in prison and responses to community orders, to better understand disproportionate outcomes	<ul style="list-style-type: none"> <li>Secure a research project to the NOMS National Research Committee and establish the extent to which negative experiences in contact with the Criminal Justice System may cause disproportionate outcomes</li> </ul>	April 2017

B 6	Deliver a service to meet the specific needs of women offenders	<ul style="list-style-type: none"> <li>As appropriate, continue to implement and embed the recommendations from the Women's Estate Review</li> <li>Define responsibilities for management of female offenders in the community to ensure needs are met and risk managed</li> <li>Publish Commissioning Strategy for women</li> </ul>	Ongoing
B 7	Introduce equality related performance measures at key stages in the reconfigured offender journey in the community.	<ul style="list-style-type: none"> <li>Amend case management tool (N Delius) to introduce fields for all protected characteristics</li> <li>Report quarterly against a minimum of six objects as part of the wider offender journey data pack</li> </ul>	January 2016
B 8	Collaborate with staff developing training to ensure equality is integrated into all learning products	<ul style="list-style-type: none"> <li>ERD Group to have formal engagement with the Learning and Development Group</li> <li>Ensure that Equality Analysis is completed as standard and informs the quality of all training</li> </ul>	Ongoing and April 2016
B 9	Drive up the quality of NPS data coverage for offenders' protected characteristics	<ul style="list-style-type: none"> <li>Mandate use of the NPS Equality Information Form at the first point of contact at Court.</li> <li>Improve and maintain data coverage in the Probation Divisions through easier navigation onto case management system</li> </ul>	January 2016 and ongoing
B 10	Monitor equality related practice in delivery of the offender journey in custody and the community	<ul style="list-style-type: none"> <li>Produce quarterly reports on national, regional and divisional outcomes against key measures</li> <li>Training to be developed to maximise objectivity in report content, risk assessment and sentencing proposals</li> <li>Court working party to feed into Court reference group</li> </ul>	Ongoing
B 11	Offenders with learning difficulties and disabilities will be supported and helped to access appropriate services	<ul style="list-style-type: none"> <li>Define specific actions relevant to Theme 5 of Commission Intentions document in relation to learning difficulty and disability</li> </ul>	Ongoing
B 12	Develop pro-social, inclusive environments that encourage meaningful offender engagement and which are attentive to language and cultural considerations. This would include Approved Premises.	<ul style="list-style-type: none"> <li>Define optimum environments within budgetary and physical constraints</li> <li>Gather information through each NPS Division and define actions to address issues presented</li> <li>Consult Approved Premises estate managers to identify changes to processes that may impact on meaningful engagement</li> </ul>	Ongoing Ongoing October 2015 and ongoing
B 13	Ensure that voices of service users inform our understanding of inclusive practice. This has two separate strands: 1) Victims and 2) Offenders	<ul style="list-style-type: none"> <li>Explore options for gaining more insight into service users' perspectives 1) Victims and 2) Offenders.</li> <li>Work with the Probation Institute to affect best outcomes for service users</li> </ul>	Ongoing

## THEME C. WHOLE SYSTEM

	<b>What we want to achieve</b>	<b>What action we will take</b>	<b>Timescale</b>
C 1	Embed equality considerations into all strands of the ongoing contract management of Community Rehabilitation Companies	<ul style="list-style-type: none"> <li>Adhere to a framework and agreement to support robust contract management of equality criteria</li> </ul>	Established and ongoing
C 2	Ensure equality considerations inform commissioning intentions, in the community and custody. Use data obtained from the offender segmentation process to contribute to commissioning decisions	<ul style="list-style-type: none"> <li>Contribute to the assurance process for Commissioning Intentions for Equalities in custody and the community</li> <li>On a quarterly structured basis, consider equality in relation to offender segmentation</li> </ul>	January 2016  Ongoing
C3	Introduce an Agency Instruction on Equality Analysis (replacing Equality Impact Assessment)	<ul style="list-style-type: none"> <li>Introduce and promote Equality Analysis and ensure that all staff developing policy and procedure engage with it, to improve upon and replace Equality Impact Assessment</li> <li>Maintain a national database to record the extent of completion in relation to policy</li> <li>Assure quality by sampling Equality Analyses at various stages; both routinely in response to requests for guidance and in a targeted, structured way</li> </ul>	January 2016  Ongoing
C4	Continue to implement the NOMS Welsh Language Scheme (WLS) by providing prisons and the Probation Service with realistic and practical instructions; to ensure that we operate on a basis of equality for English and Welsh languages, as outlined in the Welsh Language Measure (2011)	<ul style="list-style-type: none"> <li>Following publication of the WLS Annual Report, produce an Agency Instruction for the Welsh language, using the WLS as the basis, taking into account the impact of the forthcoming Welsh Language Standards</li> <li>In advance of their implementation, engage with NOMS Wales in understanding how the new Welsh Language Standards will affect our organization</li> </ul>	January 2016  November 2015