

PPO Race Action Plan 2021/22



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Ombudsman's foreword



We are launching the PPO Race Action Plan as the culmination of a year of focused work to build on the PPO's ambitious vision to be the most inclusive organisation. One strand of this important work is our commitment to ensure that our organisation is antiracist and for our Black, Asian and Minority Ethnic staff to feel that they can bring their whole selves to work, that they feel a sense of belonging, that they are empowered to reach their full potential, and that they are valued and respected at work.

We, as individuals and as an organisation, benefit enormously from strength in difference. Each of us will have our own perceptions of what inclusion means based on our own personal circumstances and experiences. Following the murder of George Floyd last year and the subsequent global focus on race disparity, we have taken time to have some difficult but crucial and constructive conversations with all our staff about race issues, from reflecting on our good practice and what we could have done better in the past to focusing on our plans to get the best out of the rich diversity of our staff. Through interviews organised by the Race Sub-Group of our Equality, Diversity and Inclusion Group (EDIG), we spent a lot of time talking to and listening to our Black, Asian and Minority Ethnic colleagues to understand in detail their perceptions and experiences at work while we developed this action plan. Many of them gave us valuable input, and I would like to thank them for sharing their personal stories and views.

We also welcomed the Ministry of Justice's Race Action Plan towards the end of last year, and particularly its focus on working towards a belonging approach. We have tried to build on this, with meaningful and tangible actions which we hope will make a difference to all our staff, our work and how we embody our values as we move towards embedding an even more inclusive work environment.

Every one of us, regardless of whether or not we belong to an underrepresented group, has a key role to play in developing a fully inclusive environment. I am looking to every member of my staff, especially our leaders and managers, to take this challenge seriously and help me deliver on this commitment. Not only should we embrace difference but we need to challenge ourselves to reflect on our own biases and how our behaviours affect those with whom we interact. We must be bold and speak up when we do not feel included and call out and address inappropriate behaviours whenever we see or hear them.

Sue McAllister CB

Prisons and Probation Ombudsman
October 2021

Introduction

The PPO Race Action Plan is underpinned by five fundamental principles:

- Racial inequalities manifest themselves in daily situations, processes and behaviours. They are not necessarily overt or isolated incidents.
- The PPO, as part of the wider Civil Service, cannot reach its full potential unless it can benefit from the talents of its whole workforce as a reflection of the diverse communities we serve and until individuals from all ethnic backgrounds can benefit equally from the opportunities it affords.
- If we are to tackle racial disparity effectively, we need to achieve long-term organisational culture change.
- Black, Asian and Minority Ethnic staff are not a homogenous group. People from different ethnic backgrounds have different experiences and those complexities need to be considered.
- All individuals have multiple identities, and the intersection of those different identities should be considered, wherever possible.

Our Race Action Plan contains five overarching objectives, broadly based on the life cycle of an employee, and articulated as 35 actions.

The objectives are:

- 1. Recruitment**
- 2. Learning and development**
- 3. Belonging, engagement and voice**
- 4. Embedding a culture of inclusion**
- 5. Race issues in casework and outward-facing work**

You may notice that our learning and development strand does not include an action for unconscious bias training. The Civil Service has recently moved away from promoting unconscious bias training. This is not because it is not important for us to pay attention to the deep-seated prejudices we unknowingly absorb and the implicit assumptions we make due to living in unequal societies but because recent research has indicated that such training has little impact on long-term behaviours and attitudes. Instead, we have tried to address this gap, with the aim of decreasing bias, through developing actions which increase our exposure to and understanding of diverse perspectives and equality, diversity and inclusion issues, including race-related issues. This may be through a greater and more frequent dialogue with our colleagues at every level of the PPO, looking at our policies and practices through an inclusion lens or inviting external speakers with diverse experiences.

The PPO's EDIG Race Sub-Group will oversee this work, monitor the progress of actions in this Race Action Plan quarterly and update the plan annually. The actions are specific, measurable and achievable, and include targets and set timeframes. We have identified individuals responsible for leading action in particular areas to ensure delivery.

Language disclaimer

Language influences how we perceive and categorise reality. We have committed not to use the acronym BAME but rather refer in full to people from Black, Asian, and Minority Ethnic groups, including those from White Minority Ethnic backgrounds. We are aware of the limitations of grouping together such a wide range of people and their diverse lived experiences. As we monitor our progress on the actions in this plan, we will check to see if a particular ethnicity or ethnicities within our UK Black, Asian or Minority Ethnic community face distinct challenges that need to be recognised and addressed.

We also continue to have concerns about the use of the term 'race' as it is an artificial construct originally used to divide people. Despite this, we have continued to use the term as it is so widely understood and used, even as a legal term. We will continue to monitor our use of the word until such time that we identify a more appropriate term.

However, we still need to use some classifications such as Black, Asian and Minority Ethnic to analyse how ethnicity affects our processes and our experiences. It is important to understand and tackle issues that groups of people may face and remove barriers to be in a position to treat people as individuals.

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Objective One: Recruitment

To ensure a fair and inclusive recruitment and selection process and ensure that we recruit a diverse workforce which is reflective of the community we serve.

Key deliverable	Measure of success	Lead
1. To analyse recruitment advertisements and ensure that content considers inclusiveness and promotes our values.	We attract diverse applications. We consistently monitor data for external recruitment campaigns through SSCL.	PPO Race Sub-Group in conjunction with the Head of Strategic Support
2. To ensure that the requirements of the tests take into account inclusiveness, are considered through a diversity lens and consider any work the MoJ has done to address this issue.	Test questions are unambiguous, written in plain English and allow all candidates to answer with confidence.	The Head of Strategic Support and Senior Leadership Team
3. To ensure that our recruitment panels are diverse.	We have in place a quality assurance process at the end of each campaign to assess if this was achieved and identify what changes need to be made.	EDIG Race Sub-Group and Senior Leadership Team
4. To ensure that a member of every recruitment panel considers interviews through a diversity and inclusion lens.	Every panel identifies one person to lead on diversity and inclusion issues and completes a template checklist to verify that this has been done. (See point 6 below.)	EDIG Race Sub-Group in conjunction with Senior Leadership Team
5. To develop a diversity and inclusion checklist to ensure a consistent approach and provide informal training on the expectation and purpose.	Checklist used in all recruitment campaigns.	EDIG Race Sub-Group
6. To ensure that the PPO includes a question on inclusion in all recruitment interviews.	Race Sub-Group devises an appropriate question, approved by Senior Leadership Team, that is used in all interviews.	Senior Leadership Team

7. To clarify what data we collect and should collect about race and other diversity data.	Relevant diversity data is collected and used to inform this Race Action Plan and future recruitment campaigns.	EDIG Race Sub-Group in conjunction with Deputy Ombudsman for Learning Lessons and Strategic Support and the Head of Strategic Support.
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Objective Two: Learning and development

To ensure that:

- staff from Black, Asian and Minority Ethnic backgrounds are supported to reach and showcase their full potential; and
- staff from Black, Asian and Minority Ethnic backgrounds are developed effectively to allow them the opportunity to progress, whether internally or externally, on promotion or otherwise.

Key deliverable	Measure of success	Lead
1. To continue the existing PPO mentoring scheme and encourage participation from Black, Asian and Minority Ethnic staff.	Black, Asian and Minority Ethnic staff take up the opportunity to be involved in the mentoring scheme, and this leads to increased confidence, job satisfaction and engagement. Mentees progress. There are also positive outcomes for the organisation in terms of performance and engagement. We monitor feedback through surveys to assess success.	EDIG Race Sub-Group and Learning Lessons Team
2. To provide ad hoc job application form support for Black, Asian and Minority Ethnic staff.	Staff feel more confidence in applying for jobs, and the quality of applications improve.	EDIG Race Sub-Group
3. To provide training for staff on skills needed to undertake Civil Service job interviews and to encourage take up from Black, Asian and Minority Ethnic staff.	Black, Asian and Minority Ethnic take up this training opportunity, and it leads to increased confidence in applying for jobs, internally and externally, and in an improved experience of and performance in interviews.	Senior Leadership Team
4. To develop quarterly drop-in career support surgeries for Black, Asian and Minority Ethnic staff.	Improved job satisfaction, career development, engagement in	EDIG Race Sub-Group

	corporate projects and selection for job opportunities.	
5. To introduce role model sessions/presentations from Black, Asian and Minority Ethnic speakers on career progression and other issues.	Increased motivation and self-belief to encourage career progression. To hear individual perspectives on race issues, challenges faced, and solutions found.	EDIG Race Sub-Group

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Objective Three: Belonging, engagement and voice

To ensure that the culture of the PPO is fully inclusive, including that:

- staff feel able to bring their *whole selves* to work and feel understood, valued and respected; and
- staff feel a sense of belonging at work so that they are engaged and use their voice to make an impact in all aspects of work culture.

Key deliverable	Measure of success	Lead
1. To ensure that all PPO events are inclusive and considered through an inclusion lens.	Improved engagement and feedback from Black, Asian and Minority Ethnic staff and those with other protected characteristics.	All staff and event organisers
2. To celebrate and commemorate events which champion racial diversity and inclusion such as Gypsy, Roma and Traveller Month, Black History Month and South Asian Heritage Month.	Increased awareness among all staff and for Black, Asian and Minority Ethnic staff, an additional sense of being accepted and valued for their whole self.	EDIG Race Sub-Group
3. To introduce an annual PPO Culture Day, showcasing the diverse cultures and ethnic backgrounds of staff through food, music, clothing, the arts and an opportunity to get together with colleagues.	An increased sense of belonging and engagement among Black, Asian and Minority Ethnic staff and an opportunity for all staff to learn more and socialise with each other.	EDIG Race Sub-Group
4. To communicate our progress and share information on race-related issues with the organisation through regular EDIG briefings.	All staff have read the content of our briefings and give positive feedback about it.	EDIG Race Sub-Group
5. To encourage Black, Asian and Minority Ethnic staff to contribute to the Monday motivation email and to organise and engage with PPO events such as coffee roulette and coffee mornings.	Communications and events become more diverse and appeal to a greater cross-section of staff. Greater engagement from Black, Asian and Minority Ethnic staff.	EDIG Race Sub-Group and all Black, Asian and Minority Ethnic staff.

6. Seeking feedback from staff on this plan and acting on feedback.	Revised action plan shared, taking into account feedback received.	EDIG Race Sub-Group
7. Seeking feedback on views of Black, Asian and Minority Ethnic staff on the issues raised in this plan and their experience at work through interviews and surveys.	The PPO better understands the perspective of and challenges faced by Black, Asian and Minority Ethnic staff and work to address them through this action plan.	EDIG Race Sub-Group in conjunction with Deputy Ombudsman for Learning Lessons and Strategic Support and the Learning Lessons Team
8. To publicise the process to follow if staff experience discrimination, harassment, bullying or racism and to publicise how to escalate a potentially race-related concern with managers or another member of staff.	All staff are aware of the process to follow and are confident is using it.	The Executive Committee, Senior Leadership Team and the EDIG Race Sub-Group
9. To develop a PPO template statement on zero-tolerance to racism to add to all complaints eligibility letters and other correspondence, where relevant.	The PPO protects and supports its staff, and makes it clear internally and externally that it takes a zero-tolerance approach to racism and will act on all incidents of racism shown towards our staff.	EDIG Race Sub-Group in conjunction with the Executive Committee and Senior Leadership Team
10. To ensure that exit interviews are conducted consistently and that there is a clear process in place to take account of and act on feedback.	The PPO identifies themes and issues that may need action, that these are addressed and that there is an action plan to evidence action taken. Positive feedback is passed on to relevant managers and staff members.	Deputy Ombudsman for Learning Lessons and Strategic Support and Senior Leadership Team.

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Objective Four: Embedding a culture of inclusion

To ensure that our workforce is committed to equality, diversity and inclusion, and are antiracist, including that:

- the Senior Leadership Team lead by example in actively communicating and promoting values of inclusion and cultural change;
- the Senior Leadership Team has a zero-tolerance approach to racism in supporting and protecting our staff;
- staff from Black, Asian and Minority Ethnic backgrounds feel safe to raise race-related issues, confident that they will be appropriately addressed;
- managers and all staff are equipped with empathy, knowledge and understanding to address key race, diversity and inclusion issues promptly and effectively; and
- managers and all staff develop a greater understanding of the intersectionality of people's identity (that is, an understanding that individuals have a number of protected characteristics which together, form their unique identity).

Key deliverable	Measure of success	Lead
1. To ensure that all touchpoint discussions and monthly team meetings include equality, diversity and inclusion as an agenda item, and that touchpoint discussions allow for staff to raise race-related issues.	Staff confidence that race issues are addressed promptly and effectively. Minutes demonstrate that equality, diversity and inclusion issues have been discussed and action taken.	Senior Leadership Team
2. To organise training for managers and EDIG on how to lead from the front and by example in managing diverse teams well, tackling inclusion issues proactively and responding to race-related and inclusion-related concerns, complaints and issues.	Positive staff feedback about how managers respond to concerns.	EDIG and Senior Leadership Team
3. To keep up to speed with the debate about suitable language to categorise ethnic and cultural backgrounds and decide preferred terms for the PPO.	Our language is inclusive and is not perceived to add barriers between different ethnic groups.	EDIG Race Sub-Group and all staff
4. To ensure that potentially racist incidents, regardless of whether staff consider they are minor or serious, are reported to senior	Staff report that they feel safe and supported by the PPO, and that a record is kept of issues raised, action taken and	All staff and Senior Leadership Team

managers and escalated and addressed appropriately.	responses, for example, when incidents have been reported to HM Prison and Probation Service.	
5. To work closely with all the EDIG sub-groups to raise awareness of intersectionality issues, for example, race and religion.	Cross-working events and communications are successful, and we receive positive feedback from staff.	EDIG
6. To introduce a requirement for all team meetings to discuss a specific diversity and inclusion issue monthly.	All teams from the Senior Leadership Team to individual teams across the office discuss a topic monthly and take forward any actions for improvement.	EDIG and Senior Leadership Team
7. To ensure that stand-up and full staff meetings demonstrate an organisational commitment to diversity and inclusion issues.	Allyship and a commitment to inclusion is demonstrated at all levels of the organisation.	Senior Leadership Team, EDIG and Communications Officer
8. To encourage staff to become race allies and allies for other protected characteristics, give them the skills to know how to be good allies.	A fully inclusive organisation, where individuals feel valued, respected and supported.	EDIG
9. To introduce training on understanding white privilege.	Increased awareness and understanding.	EDIG Race Sub-Group
10. To ensure that every member of staff has a meaningful diversity and inclusion objective which includes clear and measurable ways to lead or collaborate with their team inclusively.	The diversity and inclusion objective is embedded in induction training and touchpoint discussions.	Senior Leadership Team and EDIG

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Objective Five: Race issues in casework and outward-facing work

To ensure that the PPO is proactive in addressing equality, diversity and inclusion issues, including race-related issues which arise in the course of our work.

Key deliverable	Measure of success	Lead
1. To consider the Lammy review on the treatment and outcomes for Black, Asian and Minority Ethnic individuals in the criminal justice system in the context of its intersection and potential impact on the PPO's work.	Actions and recommendations identified and incorporated into this Action Plan. Impact on service users.	EDIG Race Sub-Group
2. To address effectively discrimination and racism in our casework and share knowledge with the whole office through Pulse/EDIG briefings.	Increased awareness of issues and how to deal with them.	EDIG Race Sub-Group to lead in conjunction with all staff.
3. To review the handling of discrimination in complaints with the aim of standardising our response.	The PPO has a consistent approach to and understanding about how to deal with issues.	EDIG Race Sub-Group and Complaints managers.

**Prisons &
Probation**

Ombudsman
Independent Investigations

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