



National Offender
Management Service

Equality Analysis

An Equality Analysis starts at the beginning of and is part of project or policy development, consistent with the approach outlined in AI 14/2016 PSI 20/2016 PI 19/2016. The 'checklist' below is a way to capture the audit trail and provides some reminders of what should be considered, throughout the development of the project. Equality Analysis is about taking every opportunity to embed equality into the project or policy. This will improve its quality, partly through identifying and mitigating risks; including the potential for bias, unconscious or otherwise. By populating the fields below, you can show how you have achieved this.

Name of Policy / Project, Practice or Procedure under development (hereafter called 'product')

Downview E Wing

Brief description of the planned product

E Wing will hold transgender women with a gender recognition certificate ("GRC") who present a high risk of harm to other women. Women will only be able to be placed on E Wing when they meet the criteria set out in the policy and have been allocated to E Wing through the National Complex Case Board.

E Wing has been developed in response to an operational need to find a long term solution for the management of a specific cohort of high transgender women with GRCs which appropriately balances the rights of these individuals and the rights and safety of the other female prisoners (both trans and non-trans) in the women's estate.

All of the women located on E Wing will have an individualised Care Plan which will ensure that they are provided with maximum regime whilst ensuring other women are safeguarded from harm. Individual Care Plans will also contain actions to enable the woman to work towards reducing the risk of harm that they present.

Women on E Wing will be located within a women's prison, and have access to services for women prisoners in line with the Women's Policy Framework. They will have access to as much regime within the prison as their risk assessment permits delivered in a way which enables HMP Downview to also meet its duties to protect the rights of all women prisoners to live in safety and free from abuse.

Background to the development of the policy

PSI 17/2016, the Care and Management of Transgender Offenders, sets out that it is the desired outcome of the PSI "*to treat all transgender offenders in our care and under our supervision fairly, decently and lawfully*". PSI 17/2016 requires prisons to allow prisoners to express the gender with which they identify. In managing transgender prisoners within the prison estate, an operational issue arose regarding the location of transgender women with GRCs who pose a risk of harm to other women.

Transgender women who have a GRC are legally female in accordance with the Gender Recognition Act 2004 and must be treated as female for all purposes. PSI 17/2016 sets out that transgender women with a GRC must be located in the female estate unless there are exceptional circumstances where the *“risk concerns surrounding the prisoner are sufficiently high that other women with an equivalent security profile would be held in the male estate”*.

It became apparent that there was a small cohort of transgender women with GRCs who did not satisfy the “exceptional circumstances” requirement, segregation was not appropriate for long term management and risk assessments provided that these individuals were unsafe to be placed on normal location in the women’s estate. Therefore, considerations were given as to how this cohort of prisoners could be managed long-term within the women’s estate.

Proposals included:

- Option 1 - a bespoke and separate unit in the female estate;
- Option 2 - a bespoke and separate unit in the male estate
- Option 3 - placement in the general population in the women’s estate,

Option 1: A bespoke and separate unit in the women’s estate enables these high risk transgender women to be located within the women’s estate with access to the women’s regime including risk assessed association with other women. Placement in a bespoke unit would allow greater control over the management of these prisoners to ensure the safeguarding of the other female prisoners whilst also enabling the individual’s access to a greater regime than would be provided on a unit in the male estate or in segregation.

Option 2: A bespoke and separate unit in the male estate would ensure that the rights of female prisoners were protected. However, whilst female services could be delivered to the unit, it would be very limited compared to what could be offered within a women’s prison. In addition, any level of association would be difficult in the male estate. Therefore, it was decided that a unit in the female estate would be the most appropriate way forward.

Option 3: The high risk transgender women with GRCs were assessed as having risks which could not be managed in the women’s estate and it was determined that the women could not be adequately supervised to ensure the safety of other women if the transgender women were placed on normal location. Therefore, it was decided that a unit in the female estate would be the most appropriate option which balanced both the rights of the transgender women with GRCs and also the rights of the other women prisoners.

Initially, the proposal was for a high risk prisoner unit in the women’s estate with the aim that other women of an equivalent high risk level, both non-trans and trans, would be located on the unit, in order to eliminate discrimination and foster good relations. By applying to both non-trans and trans high risk women prisoners, the prison service would have been treating those of similar risk levels in an equal manner.

However, when considering the functioning of the unit in practice, it became apparent that it would not be possible to place non-trans female prisoners on the unit for the following reasons:

- Some transgender women pose specific risks to other women which do in part derive from their transgender status. These may be from their offending history (e.g. sexual

offences, or violent offences), or may be as a result of their anatomy/physiology (e.g. their size/strength/genitalia). Other women do not, at least in the prison service's experience, tend to pose a similar level of risk.

- Those risks could not be managed as well with non-trans women present; even if such women pose a high risk to women in general too.
- This premise has been tested operationally; we have considered the non-trans women in the women's estate who are held in segregation due to their risk to others. All have specific vulnerabilities or mental health issues that mean none would be suitable for placement on E wing currently. In some of these cases, women were awaiting a mental health bed in a secure setting. In a number of cases the behaviour of the individuals meant that they presented a risk to the general good order and discipline of a prison such that segregation was the appropriate location for now, but that there was no other reason which would prevent the individual from returning to the main population within a woman's prison once this had been addressed. A number of these women also had backgrounds which made them particularly vulnerable – whether due to mental health or other issues around unhealthy relationships.
- The characteristics of the women presently in long term segregation are not unusual, and, in the prison service's judgement, are likely to persist over time. At the moment, although it will be kept under review, we do not envisage the types of non-trans women ordinarily present in segregation units to be suitable candidates for E wing.
- Women in long term segregation are often more likely to have been the victim of a sexual or violent crime rather than the perpetrator of one.

Given that no other cohorts of female prisoners were identified to be placed on the unit, it was decided that the bespoke unit would be specifically for high risk transgender women with a GRC and they would be located within E wing in HMP Downview. The purpose of the unit is to ensure that the rights and safety of female prisoners are protected. The unit is a proportionate response to this requirement because:

- the policy ensures that prisoners are within the female estate;
- individuals on the unit are able to access as much of the regime as possible following risk assessments, which is a greater regime than would be provided if placed in segregation; and
- Care Plans will contain actions to enable prisoners to progress in relation to their risk with the aim of moving off E wing and into normal location.

We are confident that through E wing we will be able to safely provide a regime to the cohort of prisoners located there and also ensure safeguards for the other women in the prison estate.

Equality Analysis Lead: The person leading on the product

Head of E Wing and Equalities , HMP Downview

Start Date: March 2019

What are the high level equality objective/s (positive opportunities) associated with your product? How will you ensure that your project is included to all those affected? What are the risks, including risk of bias?

Equality Objectives

This policy concerns the location of transgender women with a GRC who present a high risk of harm to other women. The individuals will have the protected characteristic of gender reassignment in accordance with the Equality Act 2010.

To eliminate discrimination, harassment, victimisation, the E wing policy has been developed to:

- Ensure that transgender prisoners are treated with decency and in accordance with their acquired gender as far as possible. Although this separates trans women from non-trans women, the intention of this policy is to ensure that the safety and rights of all women prisoners are adequately protected whilst allowing these high risk transgender women access to a normal regime as much as possible following risk assessments.

To foster good relations between persons who share a relevant protected characteristic and persons who do not share it, the E wing policy has been developed to:

- Minimise the risk of harm to all women in custody (both non-trans and transgender) posed by a small number of transgender women with GRCs. Many women in custody are vulnerable adults and need to be provided with a safe environment to live within which is free from harm.

To advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, E Wing policy enables high risk transgender women with GRCs to:

- Have risk assessed access to the regime offered at HMP Downview to other women offenders.
- Participate in risk assessed integration with other women at HMP Downview to try and reduce risk, where they can address sentence planning targets, without a negative impact or risk on other women.
- Care and Management Plans will be in place for each of the women on the unit which will be bespoke ensuring that they meet the needs of the individual, including any needs arising from their protected characteristics. For example individuals will have their religious and cultural needs met through risk assessed access to services within Downview.

Risks

- There is a risk that placement on E wing will mark out trans women and there is a stigma that comes from being in a separate unit in the prison estate. Also, location on the wing may potentially disclose that an individual is transgender. However, due to the circumstances in which prisoners will be placed on the wing, it is highly likely that those in the prison will either already know that an individual is transgender or may be able to identify a prisoner as transgender, regardless of whether the individual is placed in the normal estate or on E wing.

- E wing has been developed with the intention to meet the specific operational difficulties of a very small cohort of women. Given the need to advance equality and eliminate discrimination, this policy only applies to high risk transgender prisoners who pose a risk to other women that cannot be addressed on normal location but who are required to be located in the women's estate because they hold a GRC. Other women prisoners, both trans and non-trans, who do not meet the eligibility requirements in the E wing policy will not be placed on this unit.

ACTION - The policy holders will review the data annually regarding the numbers and proportion of transgender women and where they are located.

- This service is planned to only meet the needs of transgender women in the women's estate. Operationally no equivalent need has currently been identified for transgender men in the male estate because, as far as HMPPS is aware, there are no transgender men within the male estate. If the operational requirement arose for transgender men in the male estate, the operational need for transgender men may be for a unit which is to safeguard them from potential harm in the male estate. The Transgender Complex Case Board will however have to consider this carefully when making decisions around transgender men moving into the male prison estate.

ACTION - To be added as consideration for a bespoke guide for PGD's chairing Complex Case Boards.

- There is a risk that women on E Wing will either not take up the regime offered or the regime may be limited for individuals due to individual risk assessments. The policy makes it clear that it is essential that all transgender women located on E Wing have access to as much of the regime offered in normal location as their individual risk assessment allows and that the all local policies across Downview, including Incentive and Earned Privileges Scheme, are equally applied to the women on E Wing.

ACTION - Both the Transgender Complex Case Board and the Local Care and Management Plan Meeting will have responsibility for gaining assurance that the women have full access to the regime identified within their individual Care Plans. Regime offer and take up must be clearly recorded by the staff on E Wing on a daily basis for each individual woman.

ACTION - Staffing levels to be sufficient to enable the levels of supervision required for women to access regime.

- In relation to fostering good relations between those with protected characteristics and those without, there is a risk that the relationships between the wider transgender population at HMP Downview and other women may be impacted upon by the creation of this unit within the community of HMP Downview. Specialist units within a prison can create tensions across the wider community, particularly given the needs being addressed by E Wing.

ACTION – In order to ensure that the policy fosters good relationships between the high risk transgender women on the unit and the other women in HMP Downview, staff at HMP Downview will continue to include the women on E wing in the normal regime as much as possible. The Equalities team needs to monitor the impact of the development of E Wing through its consultation structure and analysis of complaints.

- There is a risk of insufficient focus on any other protected characteristics a resident may have whilst the board processes are focused upon gender reassignment. The Care Plans will have a section to focus the board's attention to consideration of all protective characteristics.

ACTION - to add to Care Plan forms and to a bespoke guide for PGD's chairing Complex Case Boards.

First steps: Identify when in the project you will consider, plan and discuss the equality opportunities associated with your proposed product.

	Key date
Weekly E Wing Phone Calls including NHS England, Womens Estate, HMP Downview, Policy Advisors (Transgender and Equalities)	Weekly Tuesdays 1600 – 1700 (fortnightly from June 2019)
Legal advice and policy advice sought on the E Wing policy and various stages to ensure that it was considering all matters relating to equalities.	Feb – June 2019
Move specific responsibility for Equalities relating to E Wing into the Downview Equalities meeting which takes place bimonthly.	July 2019
Health and Safety – Walkthrough Of Unit by Local Health and Safety Department and Regional Health and Safety Cluster Lead.	February 2019
Ongoing assessments around Diversity / Equality and Disability considerations will continue as the scope of work develop.	June 2019
Review of the final Operating standards will consider any equalities issues and managing risk.	

Ongoing record: Key dates when equality was considered and actions taken as a result

<p>Context <u>Health and Safety Walk Through Exercise</u></p> <p>E Wing has accessible options for disabled Women to be considered.</p> <p>Health and Safety Risk assessments / Safe Systems of Work / PPE / COSSH that deliver a Safe and Secure Environment for all Women populating E Wing</p>	<p>Date February 2019</p> <hr/> <p>Action/ Owner Health and Safety Advisor</p>
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<p>Context <u>Regime Development</u></p> <p>Head of Reducing Reoffending to evaluate, discuss and develop a proposed regime for each individual on E Wing. The E Wing Regime will emulate the regime that is available to other mainstream women, including access to Education, Employment, Gymnasium, Visits, Association, faith needs, telephone, laundry, showers/ bath. However this will be restricted based on risk with the main population and be discussed through multi-disciplinary risk boards and compliance testing with restricted integration.</p>	<p>Date May 2019</p> <hr/> <p>Action/ Owner Head of Reducing Reoffending</p>
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<p>Context <u>Staff Training</u></p> <p>Staff who work on the unit have had a bespoke training package delivered for working with transgender prisoners. They will also have additional training and support regards managing risk, security and movements.</p>	<p>Date July 2019</p> <hr/> <p>Action/ Owner Head of Business Assurance</p>
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Internal sources of information:

<p>The policy framework has been consulted on. This included feedback from a range of organisations including the:</p> <ul style="list-style-type: none"> HMPPS Women's Team MOJ Women's Team Transgender and Equalities Policy Advisors (MOJ) HMP Downview

External sources of information:

Feedback from conversations with key stakeholders representing Women's spaces with the following organisations on the 2nd May 2019:

- Centre for Crime and Justice Studies
- Fair Play for Women
- Howard League
- Women in Prison

Feedback from Policy holders with key stakeholders representing the transgender community with the following organisation and the date the meeting took place:

- Gendered Intelligence 23/5/19
- Transforum 23/5/19
- Stonewall

Summarise here

The general ways you have embedded equality and inclusion into your product in order to make sure it is suitable or as relevant as possible. This will include how you have addressed the potential for bias:

Mitigating Actions

The creation of E Wing has been to reduce a risk of harm to all other women (non-trans and transgender) within the Women's Estate. A small number of high risk transgender women have been identified as posing a high risk of harm to women in custody (both non-trans and transgender women). Women need to be provided with a safe environment to live within which is free from harm. Some may have particular vulnerabilities. High risk transgender women who pose a specific risk to women create put at risk the safe environment which women's prisons strive to achieve.

The E Wing unit has been created to try to reduce discrimination as far as possible as previously the only option available to safely locate these women in the women's estate has been within segregation which provides a very limited access to regime and is not an appropriate long term residential setting. The policy allows those located on the unit to be located in the women's estate with access to women specific services and to access as much of the normal regime as possible following risk assessments.

During the period of the creation of the E Wing policy there has been significant consultation with key stakeholders around the review of PSI 17/2016 and we have been able to use this consultation to feed into the development of E Wing. There is a tension across the consultation between meeting the protective characteristics of these high risk transgender women whilst also not undermining the needs and safety of women within the wider prison population. The following specific actions have been taken in response to these issues contained within this EA:

ACTION - The Equalities team needs to monitor the impact of the development of E Wing through its consultation structure and analysis of complaints.

ACTION – Both the Transgender Complex Case Board and the Local Care and Management Plan Meeting will have responsibility for gaining assurance that the women are having full access to the regime identified within their individual Care Plans. Regime offer and take up must be clearly recorded by the staff on E Wing on a daily basis for each individual woman.

Must be alert to whether the creation of E Wing does not create an inequality for transgender men who are unable to be moved into the male estate because an equivalent service is not available. As described above it is more likely that such a circumstance would be about safeguarding the transgender man rather than the wider population.

ACTION – Add as consideration for a bespoke guide for Prison Group Director's chairing Complex Case Boards.

Allocation on the unit needs to be in compliance with the policy to ensure that only those with the appropriate risks towards other women are located on the unit.

ACTION - To ensure that only the appropriate prisoners are located on E Wing, the policy holders will review the data annually. The Transgender Complex Case Board must satisfy itself that the use of E Wing is the only way in which a transgender woman can be safely accommodated within the Women's Estate and the reasoning must be clearly laid out within the decision of the board. Please see the Monitoring and Review section for information on how decisions will be monitored.

There is a risk that an individual's other protected characteristics may be lost whilst the board processes are focused upon gender. The Care Plans will have a section to focus the board's attention to consideration of all protective characteristics.

ACTION – Add to Care Plan forms and to a bespoke guide for Prison Group Director's chairing Complex Case Boards.

Monitoring and Review

There are a number of layers of safeguarding contained within E wing policy itself and across HMP Downview more widely to ensure that the Transgender Women on E Wing are accessing a full a regime as possible;

- Individual Care Plans
- Records of regime offer and take up
- The role of the Transgender Complex Case Board in reviewing individuals on E Wing once every 6 months.
- Role of the Local Care and Management Plan Meeting
- The criteria and process for allocation of a transgender woman to E Wing.
- Management structure for E Wing
- Staff training
- IMB Visits to the Unit
- Duty Governor/ Orderly Officer Management Visits to the unit
- Regular consultation forums with E Wing women

In understanding whether or not the E Wing Policy is achieving what it set out to achieve the Transgender Complex Case Board will monitor the transgender population across the Prison Estate in respect to a number of parameters to be agreed between MOJ Policy Holders and the Transgender Complex Case Board. This information will specifically look at the location of this population and the outcomes of the boards.

ACTION - This data will be reviewed every 6 months by the board. The E Wing policy will be reviewed annually by HMP Downview and any recommendations will be considered by the complex case board.

ACTION - Equality Analysis will be a standing agenda on the Equalities Meeting at HMP Downview now this unit is opened and occupied within the establishment. The Equalities Meeting is bi-monthly.

The nine characteristics protected under the Equality Act 2010 are below. Your product may be relevant to all of them. Use these sections to evidence how you have considered, promoted or otherwise advanced your product with reference to any of them.

NB Due to the low numbers a breakdown against the protective characteristics of the current population has not been provided. Such data would create a high risk of disclosure.

1. Age

Issue

There is a risk that an individual's age, as with other protected characteristics, may be lost whilst the board processes are focused upon gender. The Care Plans will have a section to focus the board's attention to consideration of all protective characteristics.

With such a small population the most effective way of meeting the protective characteristics of the women on E Wing is at an individual level.

With regard to reduced mobility related to age a lift ensures access to the first floor level where the unit is located, social care assessments, PEEPS Age consideration is included and consultation with relevant PSIs.

Mitigating Action

ACTION - Add to Care Plan forms and to a bespoke guide for Prison Group Director's chairing Complex Case Boards

ACTION - Individual Care Plans will also consider whether it is necessary to provide a more diverse group of women for an individual to associate with and how this will be provided for.

Monitor and Review

ACTION - Downview's Equalities Meeting will be responsible for monitoring progress against the actions set out within this Equality Analysis and considering any new issue which may arise relating to all protective characteristics. E Wing will be a specific agenda item for this meeting.

2. Disability

Issue

There is a risk that an individual's disability, as with other protected characteristics, may be lost whilst the board processes are focused upon gender. The Care Plans will have a section to focus the board's attention to consideration of all protective characteristics. With such a small population the most effective way of meeting the protective characteristics of the women on E Wing is at an individual level. The physical environment is relatively new with some physical adjustments including a lift already in place.

Mitigating Action

ACTION - Add to Care Plan forms and to a bespoke guide for Prison Group Director's chairing Complex Case Boards.

ACTION - Reasonable adjustments required by any individual will be made and identified within their care map.

Monitor and Review

ACTION - Downview's Equalities Meeting will be responsible for monitoring progress against the actions set out within this Equality Analysis and considering any new issue which may arise relating to all protective characteristics. E Wing will be a specific agenda item for this meeting.

3. Gender Reassignment

This policy engages the protected characteristic of gender reassignment. Therefore, the overarching considerations of the policy set out above cover how the characteristic of gender reassignment is considered and this section should be read alongside the earlier sections.

Issue

There is a clear process in place to assess suitability for an individual to be placed on E Wing as well as a clear review process to ensure that it remains a legitimate placement. Decisions to allocate an individual in E wing will have assessed that, considering the balance of risks to the individual and from other women, this location is required to ensure the protection of female prisoners. Proper assessment of risk is paramount in the management of all prisoners and must seek to protect both the welfare and rights of the individual and the welfare and rights of others in custody around them.

All women on E Wing will be transgender and it is essential that those working on the unit have a clear understanding of their needs and the policies relating to the Care and Management of Transgender Prisoners.

In order to ensure that E wing provides a proportionate response to placing transgender women on the unit, E Wing will need to ensure that as much regime is offered with as much integration as an individual's risk assessment allows.

Mitigating Action

ACTION - Staff to be trained and to have knowledge of how to care and manage transgender prisoners.

ACTION - Records to be kept of regime offer and take up for all women on E Wing.

ACTION - Local Care and Management Plan Meeting, Management Visits and regular assurance checks on the unit to provide assurance of regime delivery.

ACTION - Head of E Wing to be specifically responsible for adherence to current National Policy and local policy will be delivered for all E Wing women if and when a Transgender issue arises.

Monitor and Review

ACTION - Downview's Equalities Meeting will be responsible for monitoring progress against the actions set out within this Equality Analysis and considering any new issue which may arise relating to all protective characteristics. E Wing will be a specific agenda item for this meeting.

4. Marriage and Civil Partnership

Issue

There is no evidence of prisoners within a marriage or civil partnership being impacted to a greater degree than the rest of the main population.

Monitor and Review

ACTION - This will be kept under review through Downview's Equalities Meeting and steps for mitigation will be considered if this becomes an issue.

5. Pregnancy and Maternity

Issue

There is no evidence of this protective characteristic being impacted to a greater degree than the rest of the main population.

Monitor and Review

ACTION - This will be kept under review by Downview's Equalities Meeting and steps for mitigation will be considered if this becomes an issue.

6. Race

Issue

There is a risk that an individual's race, as with other protected characteristics, may be lost whilst the board processes are focused upon gender. With such a small population the most effective way of meeting the protective characteristics of the women on E Wing is at an individual level.

Mitigating Action

The Care Plans will have a section to focus the board's attention to consideration of all protective characteristics.

ACTION - to add to Care Plan forms and to a bespoke guide for Prison Group Director's chairing Complex Case Boards.

ACTION - Thought will need to be given as to how the women on E Wing access the diversity events which will be celebrated across the wider community.

ACTION - Individual Care Plans will also consider whether it is necessary to provide a more diverse group of women for an individual to associate with and how this will be provided for.

Monitor and Review

ACTION - Downview's Equalities Meeting will be responsible for monitoring progress against the actions set out within this Equality Analysis and considering any new issue which may arise relating to all protective characteristics. E Wing will be a specific agenda item for this meeting.

7. Religion or Belief

Issue

There is a risk that an individual's religion or belief, as with other protected characteristics, may be lost whilst the board processes are focused upon gender. The Care Plans will have a section to focus the board's attention to consideration of all protective characteristics.

Mitigating Actions

ACTION - To add to Care Plan forms and to a bespoke guide for PGD's chairing Complex Case Boards.

ACTION - Access to Chaplaincy services and corporate worship will be in line with PSI 05-2016.

ACTION - Local Assessments have taken place to ensure appropriate resources have been allocated to deliver an ability for E Wing women to practice their religion / faith and that this will not be affected by being on E Wing.

Monitor and Review

ACTION – Downview's Equalities Meeting will be responsible for monitoring progress against the actions set out within this Equality Analysis and considering any new issue which may arise relating to all protective characteristics. E Wing will be a specific agenda item for this meeting.

8. Sex

Issue

E Wing is for high risk transgender women only. The unit is aimed at keeping all women, both non-trans and transgender, safe.

There has currently not been any need for an equivalent unit in the male estate for high risk transgender men. There appear to be two significant factors – there have not been any cases of a high risk transgender man being moved into the male estate who presents a high risk of harm to other men. The proportion and degree of vulnerability seen in the women's estate is not seen in the male estate. The scale of the male estate means that it is more able to meet specialist needs e.g. vulnerable prisoner units.

Mitigating Action

ACTION - The national Transgender Complex Case Board will escalate any case on an individual level where it is felt that an equivalent to E Wing needs to be provided for high risk Transgender men or particularly vulnerable transgender men or women for whom they feel they do not have an appropriate option for.

Monitor and review

ACTION - An annual review will be carried out of the E Wing policy by HMP Downview. This review will be considered by the Transgender Complex Case Board.

9. Sexual Orientation

Issue

Sexual orientation has been considered in so far as all offenders, including transgender people (irrespective of the stage of transitioning), may identify as heterosexual, gay/lesbian or bi-sexual. A potential bias may occur when assessing risk with regard to sexual orientation. For example, a transgender woman in the women's estate who is attracted to other women may find her relationships come under extra scrutiny compared to relationships between non-trans women. There may be legitimate concerns regarding pregnancy etc. but also a potential risk of bias and unfavourable treatment if risks aren't assessed holistically.

Mitigation

All boards are minuted with a specific risk section in the template to allow risk assessments to be evidenced.

Equality Leads/HMPPS Equality Managers are expected to attend to ensure the policy is being adhered to.

A specified operational band of management will be chairing the board who have appropriate experience and have carried out risk assessment training, to ensure all risks are assessed to inform defensible decisions.

Where any aspects of an offender's sexual orientation are deemed relevant to their care and management then this will be considered on a case by case basis, as applied to all offenders.

Monitor and review

An annual review will be carried out of the E Wing policy by HMP Downview. This review will be considered by the Transgender Complex Case Board.

How have you considered the Welsh Language Act 2010 in relation to the product and in accordance with the NOMS Welsh Language Scheme?

Welsh language

All information, literature and notices can be adapted through the establishment Equalities Manger and our translation Services. This will be visibly published for staff and women.