



Guide to Independent Reviews of Progress (IRPs) for HMI Prisons staff

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Contents

1. Rationale for Independent Reviews of Progress (IRPs)	5
2. About this document	5
3. Purposes of IRPs	5
4. Selection of sites	6
5. Working with partners	7
6. Programming	7
7. Selection of HMI Prisons recommendations and Ofsted themes	7
8. Announcement of visits	8
9. Staffing of visits	8
10. Pre-visit planning	8
11. Pre-IRP establishment visit	9
12. The structure of an IRP visit	11
13. Gathering evidence and feedback	12
14. Key stats	12
15. Deaths in custody	12
16. HMI Prisons' judgements against recommendations	13
17. Ofsted judgements against themes	13
18. Calibrating progress	13
19. Debriefing	15
20. Report writing	15

21. Publication	16
22. Media handling	17
23. Follow-up inspection	17
24. Post-IRP feedback processes	17

1. Rationale for Independent Reviews of Progress (IRPs)

- 1.1** In 2018, following a series of particularly poor inspections, the Justice Select Committee expressed concern about the ability of HM Prison and Probation Service (HMPPS) to monitor prison performance effectively. It suggested that HMI Prisons should provide ministers with an independent assessment of progress made in implementing recommendations resulting from particularly concerning prison inspections. The Ministry of Justice (MoJ) subsequently funded this work and since summer 2018 we have worked to develop a methodology for short, low-impact visits. The Independent Review of Progress (IRP) methodology was piloted twice and became part of our programme in April 2019.

2. About this document

- 2.1** This document outlines the methodology that has been designed for IRPs. It is primarily designed as a reference or training resource for Inspectorate staff and contains detailed guidance about how to conduct IRPs. It is also likely to be useful for partner inspectorates. It should be read in conjunction with the Guide for Inspectors (<https://www.justiceinspectorates.gov.uk/hmiprisons/wp-content/uploads/sites/4/2018/01/2.-GUIDE-FOR-INSPECTORS-January-2018.pdf>), which contains contextual information about HMI Prisons that is not included here. Policies such as the sanctions protocol, 'do no harm' principle and visitors' agreements, which are explained in that document, also apply to IRPs.

3. Purposes of IRPs

- 3.1** The aims of an IRP are to:
- provide an independent evidence-based assessment of how the prison is progressing against the key concerns and recommendations identified at the previous inspection
 - assess progress in terms of outcomes for prisoners in the areas of main concern
 - support improvement
 - identify any emerging difficulties or slippage in progress at an early stage
 - assess the sufficiency of the leadership and management response to our main concerns at the previous inspection.
- 3.2** The purpose of an IRP is distinct from an inspection. The purpose of an inspection is to assess the treatment of prisoners and the conditions of detention in relation to expectations and the four healthy prison tests (HPTs), and to make recommendations designed to promote improvement.
- 3.3** The below table shows the key differences between an inspection and an IRP.

Features of a full inspection	Features of an IRP
10 or 15 inspectors/researchers over seven days	Four or five inspectors over two and a half days
Comprehensive: all previous recommendations are followed up and all expectation areas are assessed	Selected recommendations are followed up
Focus on assessing treatment and conditions	Focus on assessing degree of improvement since the previous inspection
Use of expectations to make judgements about outcomes	Use of 'key questions' to make judgements about progress against the recommendations
Healthy prison tests are graded	Healthy prison tests are not graded
All prisons are inspected at least once every five years	There is funding for 15–20 site visits per year – usually struggling prisons – eight to 12 months post-inspection
Recommendations are made	New recommendations are unlikely to be made ¹
Prisoner survey	No prisoner survey

4. Selection of sites

4.1 IRPs will take place in prisons. Sites are identified by HM Chief Inspector of Prisons (HMCIP) considering factors, including:

- Poor (1) HPT scores
- The pattern of healthy prison judgements, particularly the safety score
- Repeated poor inspections
- The type of prison and the risks presented
- The vulnerability of those detained
- Failure to achieve previous recommendations
- Level of confidence in the leadership and the capacity for change and improvement.

4.2 It is therefore likely that the following will get an IRP:

- Prisons that are subject to the UN process
- Prisons where safety outcomes are poor (1)
- Prisons where none of the scores are above the line.

4.3 The following will also be considered for an IRP:

- Prisons where an HPT score (other than for safety) is poor
- Prisons with two or more successive poor inspections, particularly if the proportion of recommendations achieved is low.

4.4 The selection of sites will be led by HM Deputy Chief Inspector of Prisons (HMDCIP) at the delivery board.

¹ Exceptionally, additional recommendations may be made if an issue of significant concern relating to the safety or well-being of prisoners is discovered and is not being actively managed.

5. Working with partners

Care Quality Commission (CQC)

- 5.1** CQC will be invited to attend IRPs in prisons where it took enforcement action following the previous inspection. We will seek to program such IRPs so that the follow-up timescales match CQC's usual practice as closely as possible. CQC may decide not to attend an IRP and to follow up its notices independently following the usual post-inspection processes.

Ofsted

- 5.2** Ofsted intend to participate in IRPs when the overall judgement for education skills and work at the previous inspection was either inadequate or requires improvement. They will do so by conducting a prison monitoring visit² at the same time as the IRP. Occasionally, joint working may not be possible and Ofsted may conduct a separate prison monitoring visit.

Estyn

- 5.3** Estyn has agreed to participate in IRPs at Welsh prisons where there are key concerns and recommendations relating to education, skills and work.

6. Programming

- 6.1** There will be 15 to 20 IRP visits in each 12-month programme and slots will be filled by HMDCIP on a quarterly basis, at least four months in advance. This will allow inspection support to ensure that IRPs are formally announced to governors usually three months in advance. The head of health care will be responsible for inviting CQC to IRPs as appropriate and for advising on the timing of the IRP (the various CQC enforcement processes have different timescales) and selection of recommendations. The team leader (TL) responsible for liaison with Ofsted will ensure that Ofsted is informed of our plans, is invited to attend if appropriate (see section on working with partners above) and is asked to identify 'themes' for follow up so that it can be included in the announcement letter.
- 6.2** IRPs will take place eight to 12 months after the source inspection. Wherever possible, the TL who conducted the source inspection will be assigned to the IRP, together with at least one other inspector who was on the source inspection. A coordinating inspector will be appointed.

7. Selection of HMI Prisons recommendations and Ofsted themes

- 7.1** Once the location of an IRP is decided, HMDCIP's personal assistant will e-mail the TL and the coordinator to tell them when the announcement letter must be sent and to request a list of recommendations to be followed up two weeks in advance of that date (14 weeks in advance of the IRP date).

² 'Ofsted's approach to undertaking monitoring visits and the inspection methodology involved are set out in the Further education and skills inspection handbook at paragraphs 25 to 27: <https://www.gov.uk/government/publications/further-education-and-skills-inspection-handbook>

- 7.2** The TL will take the lead in identifying up to 15 recommendations to follow up. The list will usually include all main recommendations (or key concerns and recommendations) and may include selected others. When Ofsted is doing a concurrent prison monitoring visit, it will also include its 'themes'. (In the longer term, agreed changes to the way we make recommendations will make this task less onerous). TLs should refer to the action plan when selecting recommendations. We should not hesitate to follow up recommendations which HMPPS rejected or only partially accepted, but they should be considered carefully.
- 7.3** TLs should also think carefully about following up recommendations which were not directed at the governor, because the necessary evidence may not be easily available at the prison and therefore an IRP may not be the best means of following up such recommendations. TLs may choose to design a bespoke process for gathering the evidence needed or may choose not to select that recommendation for follow up.
- 7.4** The draft selection of recommendations should be reviewed by at least one other inspector or TL and sent to HMDCIP for approval.

8. Announcement of visits

- 8.1** The TL will send the list of recommendations, including any Ofsted themes, to HMDCIP, copied to his personal assistant at least 14 weeks in advance of the IRP. HMDCIP's personal assistant will prepare a letter (template in Appendix A) to inform the governor of our intention to conduct an IRP which will be sent 12 weeks in advance, together with the Guide to IRPs for prison staff. We will copy this letter to the chair of the Independent Monitoring Board (IMB) and invite them to meet us during the visit (template email is in Appendix B). HMDCIP's personal assistant will notify the publications team once the letter has been sent and they will update the list of IRP announcements on the website.

9. Staffing of visits

- 9.1** Once the recommendations to be followed up are confirmed, the operations meeting will finalise the team, including specialists and partners as appropriate. A TL and up to four inspectors (including partners – see section 9) will usually be appropriate. HMDCIP's personal assistant will update the allocations chart accordingly and ensure partners are copied into the next allocations update.

10. Pre-visit planning

- 10.1** The coordinator will compile a bespoke data request. This is similar to the 'key stats' request used on inspections, but is tailored so that only data relevant to the recommendations we are following up is collected (example template in Appendix C). When preparing the list, it may be helpful to start with the key stats request template and delete unwanted lines. It may also be useful to think about each of the recommendations being followed up and consider what data would help to make judgements about them. Ideally, team members will be consulted about the content of the bespoke data request.
- 10.2** The coordinator and TL will allocate recommendations to inspectors. Where possible, it may be appropriate to ask individual inspectors to follow up on recommendations they made.
- 10.3** The coordinator should confirm the identity of the prison liaison officer with the governor as necessary and arrange a half-day pre-visit to the prison approximately one month before the IRP visit.

10.4 Ofsted will make contact directly with the learning and skills manager or equivalent.

11. Pre-IRP establishment visit

11.1 Since an IRP is not an inspection, there is no expectation that the coordinator will begin collecting evidence during the pre-visit and there is no requirement to tour the establishment or seek to visit 'high-risk' areas such as segregation.

11.2 Rather, the aims of the site visit are as follows.

- To explain the IRP process (including Ofsted's involvement) to the governor and liaison officer (see liaison officer job description at appendix D) and answer any questions.
- To discuss what documentation will be provided in advance.
- To make necessary domestic arrangements.
- To meet the chair (or other representative) of the IMB and offer them a meeting with the TL during the IRP.
- To arrange a meeting between the TL and staff association representatives.

Explain the IRP process and answer any questions

11.3 Coordinators should provide a copy of the 'Guide to IRPs for prison staff' (<https://www.justiceinspectorates.gov.uk/hmiprisons/wp-content/uploads/sites/4/2019/04/GUIDE-TO-IRPs-FOR-PRISON-STAFF-March-2019.pdf>) to the governor and the liaison officer in advance of the visit and meet with both to explain the document and respond to any questions.

11.4 Coordinators should encourage governors to give a presentation on day 1 of the IRP (maximum length 1 hour). This should not simply repeat the action plan, which we will have read. Rather it should explain what staff have done to implement our recommendations (and themes), reflect on what has gone well and what has been challenging, and offer a self-assessment of how much progress has been made.

Discuss what documentation will be provided in advance

11.5 There are two parts to this, as follows.

General

We will ask the governor and liaison officer to carry out the following actions.

- Identify a manager responsible for each of the recommendations we are following up. An easy way to achieve this is to use the list of recommendations and themes from the announcement letter, add the name of the inspector allocated to each recommendation, and ask the prison to add the name of their nominee and their contact details. See example at Appendix E.
- Complete the bespoke data request (see 'Pre-visit planning' and Appendix C).
- Provide us with an updated action plan for the recommendations we are following up.
- Provide us with well-organised documentation and data which evidences the work done to respond to the concerns raised in the recommendations we are following up.
- Provide population data using the instructions in Appendix F, which are also included in the 'Guide to Independent Reviews of progress (IRPs) for prison staff'.
- Provide a copy of any operational support and assurance group (OSAG - part of HMPPS) reports.

Establishment-specific

The bespoke nature of an IRP means that it not possible to create a standard list of documentation required. Coordinators need to ask prison managers to identify and provide evidence of the work they have done to drive improvement in the areas of concern we are following up. Managers should focus on documentation which shows evidence of change, and should be selective and organised about what they send us. If nominated managers want advice about what to send, they should contact the coordinator.

Ofsted will contact the learning and skills manager directly to request an up-to-date self-assessment report and quality improvement plan.

Documentation should be provided no later than five working days before the start of the IRP visit. This date will have been included in the announcement letter sent to the governor.

Make necessary domestic arrangements

11.6 Much of this is very similar to an inspection. We will:

- provide the usual attendance/key requirement/IT information for the gate
- provide the name of the inspector who will look at each recommendation (template in Appendix E).

11.7 We need the prison to:

- organise keys
- provide a base room with access to toilets and facilities for making refreshments, a telephone with an external line and power supply (with extension leads as necessary)
- provide a separate base room for the Ofsted team
- provide information on car parking, meals, health and safety, and so on
- offer an opportunity for staff association representatives to meet the TL (for a maximum of 30 minutes) and to arrange this as necessary.

Meet the chair (or other representative) of the IMB and offer them a meeting with the TL during the IRP

11.8 This meeting is an opportunity for the IMB to provide us with any evidence they may have about progress the prison has made in the areas of concern we are following up. We recognise that from their rota visits and reports, IMBs are likely to have good insight into the challenges faced by the prison and the direction of travel, and this is an opportunity for them to present that material. We should be clear that we are not asking IMBs to second-guess our judgements. Rather, we think they have a valuable contribution to make in helping us make our judgements.

11.9 IMB chairs need to understand that this is not a general opportunity to talk about the prison, but a very specific discussion. For example, while we recognise that property issues are often high on prisoners' (and therefore IMBs') list of concerns, we will not have time to discuss them unless we are following up a recommendation on that subject.

Arrange a meeting between the TL and staff association representatives

11.10 As with the IMB, this meeting will be limited to the areas of concern we are following up. Coordinators may wish to provide the sample email in Appendix G for liaison officers to use and should ensure that all staff association representatives (not just the POA) are invited.

Other coordination tasks

11.11 The coordinator should maintain contact with the liaison officer up to and throughout the IRP to answer questions and provide advice.

11.12 Other coordination tasks are very similar to an inspection and will include:

- booking hotels
- preparing a briefing note (using the usual template)
- setting up a OneNote evidence gathering template (EGT) and populating the various sections
- ensuring partner inspectorates (as appropriate) receive relevant information (because they cannot access OneNote)
- arranging a brief opportunity for HMCIP/HMDCIP to meet the governor on day 3.

The coordinator should liaise closely with inspection support to ensure that the following documents are saved into the OneNote EGT ideally a week before the IRP starts:

- previous report
- action plan
- IMB report
- IRP announcement letter
- UN letter and action plan (if applicable)
- information from PPO if we are following up a recommendation relating suicide and self-harm prevention
- up-to-date key stats
- latest IRP report and debrief templates
- MQPL (if new since inspection).

12. The structure of an IRP visit

12.1 All IRPs will follow the same basic format (see below). Coordinators may want to prepare a more detailed version of the timetable for each visit, with precise times and venues.

Day 1

- Morning: travel
- Noon: team briefing
- 12.30pm: presentation by governor/SMT (max one hour)
- Afternoon: inspectors begin collecting evidence
- Afternoon: TL has separate meetings with governor, IMB chair and staff association representatives.

Day 2

- Morning: inspectors continue collecting evidence
- 12.30–2.30pm: IRP team meeting
- 2.30pm: TL feedback to governor
- Afternoon: inspectors continue evidence gathering using EGT and prepare short written judgements for each recommendation followed up
- Afternoon: individual bilats between TL/inspectors until final meeting.

Day 3

- HMCIP/HMDCIP may attend and will meet the governor briefly, but will not take a formal tour as this is not an inspection
- Morning: inspectors provide judgements to TL, meet named managers for feedback, and continue collecting evidence
- Morning: Ofsted inspectors confirm final key findings and progress judgements to governor, head of reducing re-offending, learning and skills manager or equivalent and other interested parties
- Afternoon: TL collates key judgements and prepares draft debrief document for discussion at deliberation meeting
- Afternoon: deliberation meeting: make judgements and finalise debrief document
- Approximately 4pm: feedback to the governor.

13. Gathering evidence and feedback

- 13.1** Sources of evidence are similar to those for an inspection. Inspectors will speak with staff, prisoners and relevant third parties; review documentation and data; and observe what happens in the prison. As in an inspection, we will make judgements on evidence which has been ‘triangulated’, i.e. corroborated by several evidence sources. We will use a OneNote evidence gathering template on all IRPs.
- 13.2** The main difference from an inspection is that there is no detainee survey. Where appropriate, we should therefore make deliberate efforts to gather and record prisoner views. For some recommendations this will be more important than others.
- 13.3** Since IRPs are shorter than inspections, there is only one opportunity (afternoon of the second day) for the TL to provide feedback to the governor (other than the final feedback). This means that inspectors need to have something to say about each area they are looking at by lunchtime on the second day, so that the TL has as much information as possible to feed back. Inspectors must meet with the nominated managers on the morning of the third day to enable the managers to supply any further information and to receive further feedback from us.

14. Key stats

- 14.1** To help inspectors interpret data, the research team will provide an up-to-date version of the key stats database including data from the most recent inspection of the establishment and comparator data for that establishment type.

15. Deaths in custody

- 15.1** Where we are following up recommendations relating to suicide and self-harm prevention, the Prisons and Probation Ombudsman (PPO) will provide us with information on deaths in custody and recommendations in the same way as they do for inspections. However, because of the limited scope of an IRP, we will not complete the usual return providing an assessment of the progress made against PPO recommendations. Nevertheless, if we identify a notable concern, we should share this with the PPO, ideally via our single point of contact. There might be particular sensitivities if an IRP visit or report coincided with the PPO publishing a report on that establishment.

16. HMI Prisons' judgements against recommendations

- 16.1** There will be no overall judgement. HMI Prisons will make judgements on progress (defined as activities which have the potential, in time, to lead to improved outcomes) relating to each individual recommendation we follow up using the following definitions:

No meaningful progress

Managers had not yet formulated, resourced or begun to implement a realistic improvement plan for this recommendation.

Insufficient progress

Managers had begun to implement a realistic improvement strategy for this recommendation, but the actions taken since our inspection had not yet resulted in sufficient evidence of progress (for example, better and embedded systems and processes).

Reasonable progress

Managers were implementing a realistic improvement strategy for this recommendation and there was evidence of progress (for example, better and embedded systems and processes) and/or early evidence of some improving outcomes for prisoners.

Good progress

Managers had implemented a realistic improvement strategy for this recommendation and had delivered a clear improvement in outcomes for prisoners.

17. Ofsted judgements against themes

- 17.1** Ofsted will make a progress judgement for each of the themes they follow up, using the following definitions:

Insufficient progress

Progress has been either slow or insubstantial or both, and the demonstrable impact on learners has been negligible.

Reasonable progress

Action taken by the provider is already having a beneficial impact on learners and improvements are sustainable and are based on the provider's thorough quality assurance procedures.

Significant progress

Progress has been rapid and is already having considerable beneficial impact on learners.

- 17.2** Ofsted will not make an overall judgement.

18. Calibrating progress

- 18.1** Judging progress against a recommendation is new work for HMI Prisons' staff. At inspections we are accustomed to, and skilled at, judging outcomes in relation to expectations. In that context, our assessments about achievement of recommendations are related to outcomes.
- 18.2** In an IRP context, we are not considering whether a recommendation has been achieved (in most cases our visit will be too soon to be certain of achievement), but instead calibrating how much progress has been made towards achievement. There may not yet be any

improvement in outcomes, but activities which are likely (in time) to lead to improved outcomes may have taken place. It is these activities which we are seeking to identify and encourage.

18.3 The following 'key questions' framework is intended to help inspectors identify such activities and calibrate progress in achieving recommendations. Although it is not strictly linear (in that improvement might happen even if one or more stage was missed and some stages might need repeating), there is a sense of progression from questions one to five. Effective change is likely to result when leaders and managers take concerns seriously, plan effectively, take action, monitor and refine procedures, and measure outcomes.

18.4 The framework can be used strategically to assess the general approach to improvement or at the level of a single recommendation. It is likely to be particularly useful to help distinguish between 'insufficient' and 'reasonable' progress because in those judgements some work has taken place, but there is not yet evidence of improved outcomes for prisoners.

Leadership

Have leaders and managers taken HMI Prisons' concerns seriously?

- Can staff articulate these concerns?
- Do staff share these concerns?
- Do staff have an in-depth understanding of the problems faced?
- How quickly after the inspection did staff start work?
- Are staff motivated to address the concerns?
- Do staff feel able to effect change?
- Are staff listening to what prisoners say about the concerns?
- Is there a sense of urgency and a clear sense of direction?

Planning

Is there a realistic plan for addressing HMI Prisons' concerns?

- Have managers developed and communicated a credible plan?
- Does the plan take account of the starting point and have key measures of success?
- Does the plan have the potential to improve outcomes in a reasonable timeframe?
- Is the plan prioritised?
- Is the plan resourced?
- Are there clear milestones/timescales and specific goals?
- Have staff, prisoners and relevant third parties been involved?
- Does a named member of staff have overall responsibility for implementing specific recommendations?

Action

Is the plan being robustly implemented?

- Is there evidence of ongoing, focused activity to achieve change?
- Are senior managers monitoring implementation of the plan?
- Do stakeholders communicate effectively to support progress?
- Do staff understand what they need to do to deliver improvement?
- Do senior managers take an interest in the implementation of the plan?
- Is data accurate?
- Do leaders and managers monitor and analyse relevant data?
- Are successes celebrated?

Is there evidence of proactive problem solving?

- Are staff encouraged to provide feedback on progress?
- Are prisoners encouraged to provide feedback on progress?
- Do leaders and managers receive support from the operational line?
- Do leaders and managers work collaboratively with partners and politicians/government departments, where relevant, to create solutions?
- Are risks identified and managed?
- Are there clear accountability systems?
- Is enforcement action taken where necessary?
- Is disciplinary action taken where necessary?

Evaluation

Is tangible/discernible improvement taking place?

- Is data on measures of success (outputs) encouraging?
- Can staff identify changes made?
- Are managers encouraging behaviour change?
- Is staff behaviour changing?
- Can prisoners identify changes made?
- Is prisoner behaviour changing?
- Are outcomes demonstrably better than at the inspection?
- How well do outcomes compare to other similar prisons?

19. Debriefing

- 19.1** The TL will develop a debriefing document on the morning of the third day using the template available in the 'Evidence Gathering Templates' folder on the G: drive. This will include text for Ofsted's themes, which Ofsted will provide. We will refine this during the deliberation meeting, and it will be used for the debrief meeting with the governor. We will leave a copy with the governor and the document will form the basis for the final report.

20. Report writing

- 20.1** A report template has been created and is available in the 'Report Templates' folder on the G: drive. Inspectors need to type their contributions directly into the template which will be shared electronically. This must be done by close of play on the fourth day. The TL will review these contributions, and add the summary and HMCIP's introduction by the end of the fifth day.
- 20.2** Each recommendation followed up must be accompanied by a concern. If we have chosen to follow up 'ordinary' or general recommendations, this concern will need to be drafted. For main recommendations, the concern can be copied from the previous report. We are still finalising how Ofsted's themes will be presented.
- 20.3** The report is structured by expectation area, rather than by recommendation. This is to make it more of a narrative. In some sections, therefore, more than one recommendation may be discussed. Where a recommendation has been rejected or only partially accepted, we should acknowledge this. A final paragraph should state our judgement in respect of each the recommendation(s).
- 20.4** The guideline word count for each recommendation is 200–300 words. It is important to keep the report relatively short so that editorial, fact check processes and publications process can be swift and facilitate rapid reporting.

20.5 The coordinator/TL needs to send the following to the editor:

- the debrief note
- the text of the draft report
- a copy of the announcement letter (so that the editor can check all recommendations have been covered)
- the governor's full name and e-mail address.

21. Publication

21.1 Our report will be sent to the Secretary of State for Justice and published on our website within 25 working days of the end of the IRP visit. IRP reports will not usually include recommendations, but in exceptional circumstances this may be considered necessary. To ensure the report is published on time, all deadlines must be met. The production process is outlined in Appendix H and explained below.

21.2 The coordinator will circulate the debrief the day after the IRP to the following:

- HMCIP
- HMCIP's Personal Secretary
- HMDVIP
- HMDVIP's Personal Assistant
- Publications Manager
- Head of Research, Development and Thematics
(HMIPrisons.Research@hmi-prisons.gsi.gov.uk)
- The governor
- Establishment liaison officer.

This e-mail will trigger:

- HMCIP's Personal Secretary to share the debrief with senior staff in HMPPS/MOJ
- the research team to prepare the various charts for the report
- the research team to initiate post-IRP feedback processes (see section on post-IRP feedback processes below).

21.3 The initial edit will take one day and the editor will pass the report back to the TL with queries. The TL will respond within a day and return the report to the editor to make the amendments. The report will then be sent to the HMCIP to review.

21.4 HMCIP will send comments/queries to the TL who must send agreed amendments to the publications team within a day. The publications team will make the amendments and send the report to HMPPS for fact checking.

21.5 HMPPS will return any inaccuracies within 10 days, and TLs and HMCIP will agree a response within three days. The publications team will send the response to HMPPS and amend the report within a day. The report will be published on our website two days later and e-mailed to the usual distribution list.

22. Media handling

- 22.1** We will prepare a media release and publish under embargo in much the same way as for inspection reports. MoJ communications will be given an advance copy in accordance with our usual processes. HMPPS intends to publish a response letter to coincide with the publication of our report.

23. Follow-up inspection

- 23.1** IRPs will usually be followed by a full unannounced inspection. The judgements made during an IRP will be used to inform decisions about the timing of this event. The UN protocol cannot be invoked following an IRP.

24. Post-IRP feedback processes

- 24.1** The research team will send a feedback form to the prison liaison officer immediately after the visit so that they can comment on process issues. Once the report has been published, we will send a feedback form to the governor. When received, both sets of feedback will be circulated to the TL, HMCIP, HMDVIP, Head of Inspection Support and Head of Research, Development and Thematics.