



**Submission by the Irish Penal Reform Trust to the Joint Committee on Justice on the General
Scheme of the Irish Prison Service Bill**

7 September 2023

The Irish Penal Reform Trust

Established in 1994, the Irish Penal Reform Trust (IPRT) is Ireland's leading civil society organisation campaigning for rights in the penal system and the progressive reform of Irish penal policy. Our vision is one of respect for human rights in the penal system, with imprisonment used only as a sanction of last resort. We work towards progressive reform of the penal system based on evidence-led policies and a commitment to combating social injustice. IPRT publishes a wide range of policy positions and research documents; we campaign across a wide range of penal policy issues; we work constructively with all stakeholders; and we have established IPRT as the leading independent voice in public debate on the Irish penal system.

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Introduction

1. The Irish Penal Reform Trust (IPRT) sincerely thanks the Joint Committee on Justice ('the Committee') for the welcome opportunity to make a submission on the General Scheme of the Irish Prison Service Bill 2023.
2. IPRT is Ireland's principal independent non-governmental organisation working for systemic penal reform and change. Our vision is a just, humane Ireland where prison is used as a last resort. Our mission is to advocate for a progressive criminal justice system that prioritises alternatives to prison, upholds human rights, and champions reintegration. We do this through conducting research, campaigning and changing attitudes.
3. To this end, we hold the State to account by calling out human rights issues within the system and push for the highest possible standards of human rights recognition and compliance within the criminal justice system.
4. By way of further information, IPRT's most recent flagship report - '[Progress in the Penal System 2022](#)' ('PIPS 2022')¹ provides an overview of conditions in the Irish penal system as of the end of 2022. This publication is the latest in a series of annual reports that began in 2017. The PIPS series benchmarks the rate of progress in the Irish penal system against a set of standards that are informed by international human rights standards and best practice in penal reform.

The General Scheme of the Irish Prison Services Bill: General Observations

5. IPRT welcomes the publication of the draft [General Scheme of the Irish Prison Service Bill 2023](#) ('the General Scheme'). IPRT has long called for the placement of the Irish Prison Service (IPS) as an independent prisons authority on a statutory basis - a recommendation first made in 1997 by an expert group, chaired by Dan McAuley ('the McAuley Report'), when the Irish Prison Service was established on an administrative basis as an agency of the Department of Justice.² Placing it on a statutory footing is essential to ensuring that the highest of standards are maintained in governance and accountability in the IPS.
6. Accountability and oversight structures have a different significance in the 'closed world' of prisons. Accountability in the prison system encompasses much more than the prevention of human rights violations behind closed doors: it involves ensuring the prison system meets its own mission to provide "safe and secure custody, dignity of care and rehabilitation to

¹ IPRT, *Progress in the Penal System 2022* (May 2023). Access [here](#).

² Irish Prison Service Strategy Statement 2001-2003. Access [here](#). This provides some of the history to the establishment of the IPS.

prisoners”³ and that it does everything it can to minimise the harmful effects of imprisonment on people so held.⁴

7. While the publication of the General Scheme is welcome, though long overdue, it must be recognised that what must follow is a firm commitment to adequate investment in the proposed governance and audit structures of the IPS. Governance does not begin and end with the establishment of an independent board: governance infrastructure comprises capacity to monitor, review, report and evaluate.
8. From the outset, and contrary to the Government press release that accompanied the publication of the General Scheme, IPRT also wishes to state emphatically that increasing prison capacity should not be the primary solution proposed to the current crisis of overcrowding in the prison estate, nor should it be the *focus* of any capital investment. The Government has accepted and recognised this position in principle, in its ‘[Review of Policy Options and Penal Reform](#)’ (*‘Review of Penal Policy Options’*). The Review of Penal Policy Options offers an opportunity to wholly transform the approach to the penal system by developing innovative and evidence-based approaches in policy and practice, with the stated aim of reducing the number of people sent to prison on short-sentences. It is worth noting that, each year, approximately two-thirds of all people committed to prison are for periods of less than 12 months.⁵
9. The publication of the General Scheme comes at a time when there is deepening pressure on the IPS, with increasing levels of overcrowding along with other issues, such as the high proportion of people with mental health difficulties in the prison system. These critical issues will have a bearing on oversight and governance for any new board structure, because without a commitment to address overcrowding in the prison system more generally, there is an inherent risk that the new board will become a firefighting operation.

Heads of The General Scheme: Specific Comments

Statutory Functions of the IPS (Head 7)

10. IPRT welcomes that there will be key statutory functions of the IPS, as set out in Head 7(1)(c) – (f), focussing on the provision of humane custody conditions with an emphasis on the well-being of those in custody.
11. These statutory obligations are “to treat prisoners with humanity and respect”, “provide ... services and activities...(to promote) the health, self-respect and spiritual, moral, and mental well-being of prisoners”, “to afford education, training and other developmental opportunities to prisoners”, and to “co-operate and collaborate with other State bodies and

³ Irish Prison Service, *Mission and Values* <https://www.irishprisons.ie/about-us/mission-and-values/>

⁴ Irish Penal Reform Trust, *Progress in the Penal System 2019*, ‘Accountability within the ‘closed world of prisons (2019)’, access [here](#).

⁵ IPRT, *Progress in the Penal System 2022* (May 2023), p. 19, 60. Access [here](#).

with relevant Departments of State in the interests of prisoner welfare, the reduction of offending and an efficient and effective criminal justice system”.

12. There is a conditional element added to the nature of these statutory obligations. Subhead (3)(a) notes that these functions “shall” be performed “with full regard to the resources that are available to it for the purpose of such performance and the need to secure the most beneficial, effective and efficient use of those resources”, while having to comply with, for example (see (subhead (3)(b))), Minister or Government policies and objectives and statutory obligations under section 42 of the IHREC Act 2014 and human rights law generally.
13. Therefore, while these are most welcome by way of statutory obligations on the IPS, it must be ensured that the IPS is adequately funded by way of both capital investment and resourcing for staffing to enable the fulfilment of these obligations.
14. Head 8 (arrangements with external service providers) is also to be welcomed. Clarifying the legal basis on which arrangements can be made with external service providers will embed good practice in this respect.

Director General (Part 2 and Part 6)

15. Heads 12-14 of the General Scheme, establishing the role of the Director General of the IPS as a statutory role with core functions and statutory procedures of appointment, etc., are welcome.
16. The statutory appointment of the Director General as the accounting officer for the IPS, at Head 34, is also welcome. This has been long called for by IPRT⁶ and others, including the Office of the Inspector of Prisons (OIP) in its report entitled ‘*Culture and Organisation in the Irish Prison Service*’ of 2015 (‘the *OIP Report on Culture and Organisation*’).⁷ It is a considerable step forward in governance standards to see that the Director General “shall be accountable to the Public Accounts Committee for the appropriate account and other matters”; with the objective of facilitating “enhanced accountability given that the day-to-day management of the Vote is carried out by the IPS” (as per the ‘Notes’ for Head 34).
17. However, there remains some matter for concern in that Head 34(3) also explicitly prohibits the Director General from “questioning” or “expressing an opinion” “on the merits of any policy of the Government or a Minister”. While the ‘Notes’ state that this is “largely modelled on section 72 of the Policing, Security and Community Safety Bill 2023”, that is an untested piece of legislation. While similar provisions do appear in legislation relating to the Director

⁶ IPRT, *10 Penal Policy Directions 2016-2021* (26 February 2016). It stated: “8. Ensure Prison Accountability - Establish the Irish Prison Service as a fully independent Prisons Authority on a statutory basis, with the Director General as Accounting Officer” Access [here](#).

⁷ Office of the Inspector of Prisons, *Culture and Organisation in the Irish Prison Service, A Road Map for the Future*, November 2015 (Judge Michael Reilly, Inspector of Prisons, and Professor Andrew Coyle), at p. 8. Access [here](#).

of IHREC and the Ombudsman for Children, IPRT notes that these provisions only limit these individuals' ability to comment on a Government policy when appearing before the Public Accounts Committee (and not other Oireachtas committees).⁸ It is not clear why the Director General should be limited in their comments on Government policies before any Oireachtas committee., and IPRT would urge the Committee to closely consider whether restriction in this manner is appropriate or necessary.

Board of the IPS (Part 4)

18. Similarly, Part 4 of the General Scheme regarding the statutory establishment of a Board of the IPS is welcome. This was called for in the *OIP Report on Culture and Organisation*.⁹
19. Head 23 deals with membership of the Board, a chairperson and 8 ordinary members, with "experience and expertise" in (to paraphrase subhead 4) in some or all areas relating to the functions of the IPS, organisational governance, public administration, or financial matters.
20. To ensure a broad representation of expertise for the benefit of the Board in fulfilling its broad statutory obligations (as under Head 7(1)), IPRT suggests that a welcome and useful inclusion in the list of "experience and expertise" could be "penal policy and/or human rights". Similarly, an added area of "experience and expertise" that would be helpful to the fulfilment of statutory obligations would be the area of healthcare.
21. The *OIP Report on Culture and Organisation* called for consideration to be given to some non-executive members being appointed to the Board. The IPRT commends the decision to have the 'ordinary membership' at this non-executive level, as a person is deemed ineligible to be appointed as a member if they are a member of staff of the IPS (Head 25(1) amongst other grounds of ineligibility).
22. However, IPRT notes with concern that all members are to be appointed by the Minister for Justice (Head 23(2)). In addition to which, the Minister "may appoint one of his or her officers as an ordinary member of the Board" (Head 23(3)).
23. Given the broad criteria of the required "experience and expertise" for appointment, IPRT urges the Committee to consider whether it could be clarified further that appointments, in whole or in part, are to be made pursuant to a public competition managed by the Public Appointments Service. The 'Notes' to this Head states as follows: "(It is envisaged that the appointments will be made in accordance with the generally applicable open process for the appointment of persons to State boards.)" (Emphasis added.) However, this needs to be reflected in the wording of the legislation itself.

⁸ See: sections 22-23 of the Irish Human Rights and Equality Commission Act 2014, access [here](#) ; and sections 18-19 of the Ombudsman for Children Act 2002, access [here](#) .

⁹ Office of the Inspector of Prisons, *Culture and Organisation in the Irish Prison Service, A Road Map for the Future*, November 2015 (Judge Michael Reilly, Inspector of Prisons, and Professor Andrew Coyle), at p. 8. Access [here](#).

Annual report (Head 52)

24. IPRT notes that there may be circumstances where greater ministerial oversight will be required considering the potentially extreme or severe nature of public safety and/or security issues that may arise in the nature of the work of the IPS. This greater oversight and close relationship between the Department of Justice and the IPS is particularly reflected in Heads 49 (Power of Minister to issue general directives and guidelines), 50 (Power of Minister to give direction to the Director General), and 52 (Duties of Director General to inform and assist the Minister), amongst others. However, IPRT is concerned that the statutory power of the Minister, as set out in Head 52, to redact in part or in full the publication of the annual report of the IPS seems particularly stringent. Given the enhanced accountability of the Director General and the enhanced governance structures of the IPS, it is difficult to envisage when such a power would have to be applied. There is no equivalent statutory provision regarding the annual reports of other statutory bodies, such as GSOC¹⁰ or IHREC¹¹. IPRT suggests that the Committee consider the need for such a statutory provision, particularly given the importance of protecting the independence of the IPS.

Statutory Committee: Audit Committee (Heads 37-38)

25. Head 37 sets out the parameters for the establishment of an ‘audit committee’, comprised of 2/3 members of the Board and 4/5 other persons, deemed to have “the skills and experience necessary” to carry out the functions of the audit committee. The functions of the audit committee are set out in Head 38 and include advising the Director General on governance and financial matters, advising the Board on financial matters relating to its function, and reporting in writing annually to the Director General and the Board (copying the Minister for Justice).
26. One of the specific areas of advice to be provided by the audit committee relates to the “appropriateness, effectiveness and efficiency of the Service’s procedures” relating to “risk management” (Head 38 2(c)(iv)).
27. However, IPRT is disappointed to observe that there is no statutory provision for the establishment of a permanent statutory committee for risk management in the IPS. The ‘Notes’ regarding Head 37 are contradictory on this point as it states that it is not proposed to have a combined audit and risk committee, despite the audit committee being tasked with also advising on risk management, nor is it intended to have a separate risk committee despite this being advised for larger “agencies”. The following extract is most relevant:

“It is not proposed to provide for a combined audit and risk committee given the Code’s advice that a separate risk committee may be more appropriate for larger

¹⁰ <https://revisedacts.lawreform.ie/eli/2005/act/20/revised/en/html#SEC46>

¹¹ <https://revisedacts.lawreform.ie/eli/2014/act/25/revised/en/html#SEC28>

agencies. (However, the committee’s functions under Head 38 include advising on the appropriateness of the risk management procedures within the IPS.)”

28. This is also contrary to the previous position of the Department of Justice in 2019 regarding its plans for placing the IPS on a statutory footing. In July 2019, following publication of a report by the Inspector of Prisons (investigating allegations of wrongdoing in the IPS),¹² the then Minister for Justice and Equality announced that a Prison Service Board was to be established, with an independent chairperson, and **three committees** dealing with **audit, risk and culture**.¹³ It stated:

“In particular, a new audit committee will report directly to the Board. Two other committees, dealing with risk and culture, will also report to the Board. An internal audit function will also be established which will review and help improve key internal controls and control systems on a continual basis. The audit committee will advise the Board on the strategic processes for internal control and governance. Announcing these developments, the Minister commented: ‘The establishment of a new Prison Service Board, with an independent chair, along with new audit, risk and culture committees, will significantly strengthen governance of the Irish Prison Service, and enhance accountability, efficiency and effectiveness. This approach is consistent with the review of the governance relationship with Justice Agencies that is taking place alongside the very significant Transformation Programme in my Department – it is a further important step in the development and modernisation of the Prison Service. I am taking steps to put a Board in place as soon as possible.’”

29. IPRT urges the Committee to consider whether a statutory provision ought to be included to establish a permanent statutory ‘risk’ committee or to at least clarify whether the audit committee ought to be more clearly specified as an ‘audit *and* risk’ committee.

Head 31 – ‘Code of ethics for staff of the Service’

30. IPRT welcomes Head 31, which provides that there shall be a “code of ethics for staff”, to include “standards of conduct and practice for staff’ and “provisions to encourage and

¹² Inspector of Prisons, ‘Preliminary Investigation by the Inspector of Prisons Pursuant to Section 31(2) of the Prisons Act 2007 into Allegations of Wrongdoing in the Irish Prison Service contained in Supplemental Affidavit to Judicial Review 785JR/2018’, 12 March 2019. Access [here](#). (“In an affidavit which emerged through court proceedings in November 2018, it was alleged that a small number of personnel in the OSG carried out improper surveillance in the Midlands prison as well engaging in other wrongdoing such as the deliberate monitoring of solicitor/client consultations and the placing of a tracker device on the private car of a prison officer.” See related statement by Minister for Justice and Equality on publication of the report [here](#).)

¹³ See ‘Statement by Minister for Justice and Equality, Mr. Charlie Flanagan T.D. accompanying the publication of the report by Inspector of Prisons pursuant to section 31(2) of the Prisons Act 2007 into allegations of wrongdoing in the Irish Prison Service’. Access [here](#).

facilitate the reporting by staff of wrongdoing”. Subhead 4 requires the Board to consult with a variety of bodies regarding the “content of the code”.¹⁴

31. However, it is not clear whether the conduct of staff under the Code will form part of any performance assessments for staff. Subhead 8 states that the Director General “shall take such steps ... necessary to ensure” that staff have “read and understood” the code and that “a record is kept of the steps taken” in this respect, for each staff member. IPRT would urge the Committee to consider in finer detail how any code of ethics would be applied to the conduct of staff in the performance of their duties.

Head 15 - Temporary Release

32. IPRT would suggest that thought be given to the process of how temporary release is to be granted within this new governance structure of the IPS. The benefits of temporary release to supporting reintegration into the community is widely accepted.¹⁵ However, while the Criminal Justice Act 1960, as amended Criminal Justice (Temporary Release of Prisoners) Act 2003, states that the Minister for Justice “may direct” that temporary release be granted, it is unclear how the procedure sits between the IPS and the Minister for Justice. The application process for temporary release ought to be clear; the General Scheme could provide an opportunity to clarify where the responsibility for overseeing and administering this process lies.

Lack of any statutory provisions regarding prison culture

33. Head 28 provides that the Board “may ... establish committees to assist and advise it” regarding its functions. This is a much-needed statutory provision and is welcomed. However, it does make up for the lack of statutory provision for a permanent or standing committee for prison culture in the IPS. This encompasses working relationships between staff and management, and between staff and prisoners – all working relationships in prison being related.
34. The importance of prison culture cannot be overstated. Access to education, healthcare, psychology, and other services are core elements of supporting rehabilitation and reintegration. However, meeting the basic needs of prisoners, providing decent living conditions, and ensuring constructive relationships between prison staff and prisoners are arguably even more fundamental to the success of any rehabilitative programmes. Recent

¹⁴ In December 2021, the IPS introduced a new Code of Ethics for staff, which set expectations as to how all staff work together, with prisoners, with their families and with other stakeholders, to create a professional and healthy working environment. See Irish Prison Service, Irish Prison Service Code of Ethics (IPS 2021). Access [here](#). The IPS Protected Disclosures Policy was also updated on 1 January 2023 and considerable efforts appear to have been made to promote access to protected disclosures, including assigning a dedicated protected disclosures manager, a dedicated portal on the staff intranet, information notices and training. See Irish Prison Service, Protected Disclosures Policy (IPS 2023). Access [here](#).

¹⁵ PIPS 2021, at p.p.88-89. Access [here](#).

research has found that prisoners' low expectations of prison life create a disconnect between international and national human rights standards and how prisoners perceive the prison environment. As a result, people in prison may not see what happens in prison as a breach of those standards.¹⁶ These elements of day-to-day life and treatment in prison can create a pervasive culture whereby people in prison tolerate poor conditions rather than challenging them in order to realise their rights.

35. Culture is also of importance when it comes to accountability within the penal system. In recent times, there has been increased activity and output by the OIP. This is welcome, but creating an effective system of accountability requires not only robust independent oversight, but also the shaping of a prison culture that respects complaints, acts swiftly to address any wrongdoings, and harnesses data and information to drive progress. Accountability is not a singular entity, one office, or one practice. While the increased output of the OIP will hopefully encourage reforms and greater accountability, this ultimately needs to be championed and driven internally by IPS management, governors, officers, and everyone who works within the prison system. Placing the IPS on a statutory footing – if properly resourced – provides an invaluable opportunity to improve governance structures within the IPS.
36. On a related note, and for context, regarding the importance of accountability in the functioning of any institution, IPRT wishes to advise the Committee that the Department of Justice review of the Prison Rules 2007 (SI no. 252/2007) ('the Rules') remains ongoing.¹⁷ The Rules touch on almost all aspects of prison conditions including, admission, accommodation, health, education, discipline, etc. Included in this review is a commitment to amend the Rules to allow for a streamlined complaints process and for the Office of the Ombudsman to take jurisdiction of prisoner complaints (as a form of independent review and oversight of how prisoner complaints are handled).¹⁸
37. This is also against the backdrop of international best practice. In 2017 Concluding Observations for Ireland, the UN Committee against Torture noted the "deficiencies" of the existing complaints system in Ireland, observing that the State "should consider establishing" an independent complaints mechanism for prisoner complaints and a "new individual

¹⁶ Sophie van der Valk and Mary Rogan, 'Complaining in Prison: "I suppose it's a good idea but is there any point in it?"' (2023) 264 Prison Service Journal www.crimeandjustice.org.uk/sites/crimeandjustice.org.uk/files/PSJ%20264%20January%202023_0.pdf accessed 28 April 2023.

¹⁷ Kildare Street, 'Prison Service' (13 June 2023). Access [here](#): "The Department has been working closely with the Office of Parliamentary Counsel to progress the amendments since November of 2020, however, progress has been intermittent due to a number of factors, including the impact of the pandemic and priority legislation taking precedence. Drafting of the amendments is now at an advanced stage and it is anticipated that this work can be completed in the coming months."

¹⁸ Kildare Street, 'Prison Service' (15 February 2023) - access [here](#). See also Kildare Street, 'Prison Service' (13 June 2023) - access [here](#).

The Office of the Ombudsman has long called for this jurisdiction to be added to its remit. (Press Release, 'Ombudsman calls for extension of remit to include prisons' IPRT, 4 February 2011. Access [here](#).)

complaints procedure”.¹⁹ Similarly, the Council of Europe has also emphasised the importance of an effective complaints procedure for both staff and prisoners, and for the Committee for the Prevention of Torture “the importance of effective grievance and inspection procedures in helping prevent ill-treatment in prisons is a recurrent theme”.²⁰

38. However, any new complaints system cannot be effective without conditions in place that support it, including the promotion of a positive culture. Prisoners are largely reliant on staff in order to access their rights and, as such, relationships play a crucial role in the prison environment.²¹ A robust complaints system in which staff and prisoners have confidence would support better management of prisons and better outcomes for everyone.
39. Prison culture can also be described as work culture, as it concerns the cultivation and promotion of good working relationships between management, staff, and prisoners.²² There are longstanding issues of ineffective and problematic organisational or work culture in the IPS, as summarised in the *OIP Report on Culture and Organisation*.²³
40. Appearing before the UN Committee against Torture in 2017, the IPS stated that it had conducted a benchmarking Measuring Quality of Prison Life (MQPL+) survey in seven prisons, with the intention to carry out repeat surveys in three to four years to measure the effects of changes in policy on the attitudes of **prisoners and staff** in prisons.²⁴ There is no public information to indicate whether or not this has happened. IPRT urges the Committee to consider whether there ought to be a statutory obligation to consult with prisoners and staff in prison on a periodic basis (for example, by way of a ‘Measuring Quality of Prison Life MQPL+ survey), as certainly the insights provided would be particularly helpful in the management and operation of the IPS, for staff and prisoners.
41. The involvement of prison staff in decision-making processes is a key element in supporting good communication. In staff surveys completed by the OIP, the majority of respondents stated that they did not feel involved in COVID-19 decision-making.²⁵ While this is a narrow metric with which to assess whether staff in Irish prisons feel involved in decision-making, in

¹⁹ UN Committee against Torture, Concluding Observations on the second periodic report of Ireland (CAT/C/IRL/CO/2) 31 August 2017, at paras. 21-22.

²⁰ Council of Europe, ‘Combating Ill-Treatment in Prison, A handbook for prison staff with focus on the prevention of ill-treatment in prison’ (2016) at p. 80. Access [here](#).

²¹ Crewe et al., ‘Staff-Prisoner Relationships, Staff Professionalism, and the Use of Authority in Public- and Private-Sector Prisons’ 40(2) *Law & Social Inquiry* 309. Accessed [here](#) 6 September 2023.

²² IPRT, *Progress in the Penal System 2022* (May 2023). Access [here](#). See Standard 30, ‘Developing positive relationships and work culture’, at p. 74.

²³ Office of the Inspector of Prisons, *Culture and Organisation in the Irish Prison Service, A Road Map for the Future*, November 2015 (Judge Michael Reilly, Inspector of Prisons, and Professor Andrew Coyle), at p. 5. Access [here](#). The executive summary of this report provides a stark overview of the history of organisational inefficiencies and “disconnect” within the IPS up to its time of publication in 2016. Chapter 2 provides an ‘Overview of the culture of the Irish Prison Service’.

²⁴ UN Web Tv, ‘Consideration of Ireland (Cont’d) – 1551st Meeting 61st Session Committee Against Torture’ (28 July 2017), 00:24:42 <https://media.un.org/en/asset/k1x/k1xiagg18m>. Accessed 10 March 2023

²⁵ Office of the Inspector of Prisons, COVID-19 Prison Staff Survey (OIP 2021). Access [here](#).

the absence of more detailed information, it could indicate that prison staff do not feel heard in IPS decision-making processes.

42. While prison oversight is often primarily considered a tool for protecting the rights of people detained, oversight also offers benefits to the prison management and prison staff by promoting best practice and contributing to the creation of better prison conditions.²⁶ However, recent Irish research exploring perceptions of oversight among prison management posited that negative perceptions of oversight appeared to stem from the wider organisational culture, which participants described as a 'blame game culture'. Although participants acknowledged that this culture was improving, the research suggested that, at present, the IPS organisational culture has not developed strong cultural norms towards oversight and accountability.²⁷
43. The research highlights the need for the IPS to explore where oversight obligations sit within the wider organisational culture by exploring the potential benefits of oversight for the organisation, fostering positive attitudes toward oversight, and potentially addressing perceived blame cultures.²⁸
44. The General Scheme offers an excellent opportunity by which a culture committee could be established, on a statutory basis, to address these issues and embed a progressive and inclusive governance structure within the IPS. Prison or work culture is vital to ensure good relationships between management, staff, and prisoners, and good working relationships ensures a positive prison environment.²⁹
45. IPRT again thanks the Committee for inviting its submission on the General Scheme and is more than willing to assist the Committee in any way possible in its deliberations.

Ends.

²⁶ Andrew Coyle, 'Professionalism in corrections and the need for external security: An international overview' (2010) 30(5) Pace Law Review <https://digitalcommons.pace.edu/cgi/viewcontent.cgi?article=1751&context=plr> Accessed 8 March 2023

²⁷ Sarah Curristan and Mary Rogan, 'When an Inspector Calls: Perceptions of Oversight among Prison Management' (2022) 263 Prison Service Journal www.crimeandjustice.org.uk/sites/crimeandjustice.org.uk/files/PSJ%20263%20November%202022.pdf Accessed 3 February 2023.

²⁸ Ibid.

²⁹ IPRT, *Progress in the Penal System 2022* (May 2023). Access [here](#). See Standard 30, 'Developing positive relationships and work culture', at p. 74.