

# Equality and Human Rights Impact Assessment (EHRIA) Template



## To be completed by the person leading the EHRIA

Title of Policy or Practice:	In-Cell Telephony
Lead Author/Reviewer:	Operations Directorate (PPU)
Date EHRIA Commenced:	November 2023
Version number:	1.2
Date EHRIA Completed:	29 <sup>th</sup> April 2024
Date New Practice signed off by Management:	29 <sup>th</sup> April 2024
Date EHRIA actions due for review on:	29 <sup>th</sup> October 2024

## Revision History

Revision Date	Version	Summary of Changes	Authoriser
November 2023	1.0	Initial Draft	Keith Waddell
January 2024	1.1	Updated Draft	Richie Coupe
April 2024	1.2	Final Draft	Sharon A Salmons

## For official use only by the Equality and Diversity Team

EHRIA Tracker Number:	
Quality Assessor name:	
Date Quality Assessed:	
Publication date:	

**Remember!** When completing the Equality and Human Rights Impact Assessment policy / practice' must be interpreted in the widest possible sense to include the full range of SPS policies, provisions, criteria, functions, procedures, practices and activities for employment and service delivery.

**Stage 1: Background information**

**What is the title of the new or revised policy/practice?**

**Practice title:** In-Cell Telephony

**What is it?**

A new policy / practice

A revised policy / practice

**Are there any other SPS policies that will be altered by the proposed changes?**

If so, they will also need to be impact assessed separately.

Yes (Please provide details)

No

**Who is leading the developing and/or implementing the new or revised policy / practice?**

This is the person who should lead the impact assessment as they are the decision maker for the changes to be implemented.

**Name** Tony Martin

**Role** Head of Operations and Public Protection

**Business Area** Operations Directorate, Public Protection Unit (PPU)

**Who else is involved in the Equality and Human Rights Impact Assessment?**

Those involved must have a detailed understanding of the policy/practice area and must be in a position to ensure that changes can be made to a developing policy/practice where they are required. It is advisable to seek the support of an Equality & Diversity Manager or practitioner for expert input. The Trade Union Side should be involved in support of the SPS Partnership agreement. Add additional boxes as necessary.

**Name** Richie Coupe

**Role** National Operations and Public Protection Manager

**Business Area** Operations Directorate (Public Protection Unit)

**Name** Roy Breslin

**Role** ISS

**Business Area** Digital Services

**Name** Keith Waddell

**Role** Head of Operations

**Business Area** HM Prison Shotts

**Name** Phil Thomas

**Role** TUS Secretary

**Business Area** Trade Union Side

Name	Claire McArthur
Role	Legal Policy Advisor
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Name	Jane Rice
Role	Service User Rights and Equalities Manager
Business Area	Strategy and Improvement, OCE
Name	Sharon A Salmons
Role	Head of Operational Planning
Business Area	Operations Directorate

## Stage 2: Scoping and evidence gathering

Scoping	
Why are you introducing the new policy / practice, or why are you revising an existing policy / practice?	<p>The introduction of in-cell telephony across the SPS estate is a new practice in place from August 2023.</p> <p>As part of the response to the COVID-19 pandemic in 2020, SPS introduced individual prison-issued mobile telephones for those in our care to support the maintenance of contact with family and social networks.</p> <p>Acknowledging the benefit that the mobile telephones brought to those in our care and how they supported the protection of various human rights, a decision was taken to introduce hard-wired telephones to all standard cells and SRU cells across the estate. There are plans to move to a hands-free handset for safer cells in the future.</p>
What is the intended outcome(s) and impact of the new policy / practice, or making the changes to an existing policy / practice?	<p>The introduction of in-cell telephony is a transformative digital development, as outlined in the <a href="#">SPS Corporate Plan 2023-2028</a> which states, <i>"Providing those in our care with in-cell telephony and technology has the potential to vastly improve options and accessibility for maintaining relationships with families and communities, education and skills development, and supporting health and wellbeing. It should also lead to improvements in service efficiency."</i></p> <p>Benefits arising from the introduction of in-cell telephony include enabling those in our care to maintain contact with their families, friends and social networks, thereby assisting them to remain connected to their local communities. This is viewed as a positive development as maintaining</p>

## Scoping

positive contact will support individuals through their time in custody. Evidence has demonstrated that maintaining family contact can support prisoners' mental health, as well as improving family relationships which may support their positive reintegration into the family and community on release from custody.

The in-cell telephony project also paves the way for further developments relating to the provision of digital in-cell prison services.

## Evidence gathering

### WHO did you consult with?

(Have you consulted/involved equality groups or other groups who will be affected by the new/revised policy/practice?)

Prior to implementation of the in-cell phones Operations Directorate took views from prison Governors, chaplains and external organisations including Families Outside. All were positive about the impacts of installing these devices. There was also feedback from those in our care after the implementation of the mobile phones during COVID which highlighted the need for regular family contact, which the in-cell phones will provide. The Scottish Prison Rules were also used as a guide to ensure the project did not breach any prison rules and to gauge whether any rules would require to be amended.

### What quantitative and/or qualitative evidence as well as case law relating to equality and human rights have you considered when deciding to develop new or revise current policy/practice? How did it shape your policy/practice?

During the COVID pandemic SPS introduced mobile phones to prisons. Prisoners were given their own mobile phone, which also had free minutes to promote family contact in the absence of family visits. Once visits were re-introduced the mobile phones were not removed because evidence from those in custody and their families showed that these had had a positive impact.

SPS then decided to introduce in cell phones to replace the mobile phones thus continuing the promotion and support of family contact. Fixed lines were introduced to replace mobile phones to provide more security compared to mobile phones which could be tampered with or taken or swapped between prisoners.

This EHRIA drew on evidence from the evaluation of the mobile phones and video calls conducted during the pandemic. Evidence was also drawn from other penal jurisdictions which have installed in cell telephony including HMPPS in England and Wales which also pointed to positive experiences for those in custody. There was also an article in the prisoner magazine Inside Times which describes the positive impact of in cell telephony.<sup>1</sup>

<sup>1</sup> [Scottish prisoners to get landlines in cells – insidetime & insideinformation](#) 6 June 2023

**WHAT did you learn from your evidence-gathering exercises?**

Evidence gathered from prisoners and families all suggested that the implementation of in cell phones would be a positive step in supporting the maintenance of family contact. Prisoners who did not have means to pay for phone credit would still be able to maintain family contact due to the free minutes added to their accounts each month. This was previously available with the mobile phone contract but not prior to this.

There are also lessons learned from the prisoner mobile phone project. Although these mobile phones were seen as positive for family contact there is intelligence to suggest that these led to bullying as other prisoners took the devices from others and some individuals were able to unlock these phones and use illegal sim cards in them. The in-cell phones still support family contact in the same way and maintain the privacy benefits but cannot be manipulated in these ways.

Prisoners spoken to were pleased with the opportunity to make calls from their cell rather than out on the gallery. By not switching off the system in the evening, prisoners who have families who work in the evening will not be disadvantaged as they can make a call later after lock-up.

Going forward it is hoped that the technology will be further developed to allow for prisoners to receive calls into their cell, from for example healthcare, which could further enhance their level of care within custody.

**HOW will this shape your policy/practice:** During the COVID pandemic restriction, SPS introduced mobile phones to prisoners to support family contact as physical visits were not possible. The feedback from this was very positive as prisoners could get in contact at times which suited them and their loved ones.

There were other benefits such as privacy, as prisoners could call from their own cell rather than from the gallery phones. By introducing free minutes, prisoners and their families did not suffer any financial burden through the use of the mobile phones. This has been seen as an important measure when considering the implementation of in-cell phones after the removal of prison issued mobile phones.

The mobile phones did cause SPS security issues as they were easily tampered with and illicit sim cards could be swapped into them. There were also reports of prisoners being bullied and having to hand over their mobile device to other prisoners.

Installing in-cell phones this will mitigate above issues, as the phones do not hold sim cards and are wired into each cell.

Prisoners will still have the flexibility of being able to make calls from the privacy of their own cell and will also still have free minutes put onto their account each month, which are viewed as important issues for those in our care.

SPS has also noted difficulties for those prisoners with hearing difficulties however a more suitable handset for this group has been identified. Unfortunately, this does not cover those who are profoundly deaf. Physical and virtual visits do allow for family contact for this group, as well as mail and the email a prisoner scheme and SPS will continue to search for a solution which will allow those who are profoundly deaf to have the same access as others.

### Stage 3: Identifying impact/outcomes

<b>The Public Sector Equality Duty</b>	
<p><b>Will the impact and outcomes of the new/revised policy/practice:</b>            (Consider for people in custody in terms of the equality risk assessment of the prisoner journey with us which includes admission, residential care, establishment regime, health and wellbeing, through care, people in custody management, visits etc.)</p> <p>Consider for staff in terms of the equality risk assessment for the staff journey with us which includes recruitment, retention, progression, promotion, training etc.)</p>	
<p><b>Contribute to eliminating discrimination, harassment and victimisation?</b>  <b>E.g.</b></p> <ul style="list-style-type: none"> <li>• Raise awareness of our SPS vision and values for equality and diversity</li> <li>• Challenge appropriately any behaviours or procedures which do not value diversity and advance equality of opportunity</li> </ul>	<p><b>POSITIVE:</b>            It will contribute to eliminating discrimination, harassment, victimisation <input checked="" type="checkbox"/></p>
	<p><b>NO EFFECT:</b>            It will have no effect on discrimination, harassment and victimisation <input type="checkbox"/></p>
	<p><b>NEGATIVE:</b>            It will make discrimination, harassment and victimisation worse <input type="checkbox"/></p>
<p><b>Advance equality of opportunity between those who share a protected characteristic and those who do not?</b>  <b>E.g.</b></p> <ul style="list-style-type: none"> <li>• Remove or minimise disadvantage</li> <li>• Meet the needs of equality groups that are different from the needs of others participation in public life.</li> </ul>	<p><b>POSITIVE:</b>            It will advance equality of opportunity <input checked="" type="checkbox"/></p>
	<p><b>NO EFFECT:</b>            It will have no effect on equality of opportunity <input type="checkbox"/></p>
	<p><b>NEGATIVE:</b>            It will reduce equality of opportunity <input type="checkbox"/></p>
<p><b>Foster good relations between those who share a protected characteristic and those who do not? E.g.</b></p> <ul style="list-style-type: none"> <li>• Tackle prejudice</li> <li>• Promote understanding</li> </ul>	<p><b>POSITIVE:</b>            It will foster good relations <input checked="" type="checkbox"/></p>
	<p><b>NO EFFECT:</b>            It will have no effect on good relations <input type="checkbox"/></p>
	<p><b>NEGATIVE:</b> <input type="checkbox"/>            It will cause good relations to deteriorate <input type="checkbox"/></p>

<b>Human rights</b>	
<p><b>Will the new/revised policy/practice breach the human rights articles?</b></p> <p>Consider for people in custody in terms of the equality risk assessment of the prisoner journey with us which includes admission, residential care, establishment regime, health and wellbeing, through care, people in custody management, visits etc.</p> <p>Consider for staff in terms of the equality risk assessment for the staff journey with us which includes recruitment, retention, progression, promotion, training etc.</p> <p><b>Consider:</b></p>	
European Convention on Human Rights	
Article 2	Right to life (e.g. suicide prevention)
Article 3	Prohibition of torture (e.g. person unable to consent)
Article 4	Prohibition of slavery & forced labour (e.g. safeguarding vulnerable people)
Article 5	Right to liberty & security (e.g. security procedures)
Article 6	Right to a fair trial (e.g. disciplinary procedures)
Article 7	No punishment without law (e.g. disciplinary procedures)
Article 8	Right to respect for private & family life (e.g. access to family)
Article 9	Freedom of thought, conscience & religion (e.g. sacred space)
Article 10	Freedom of expression (e.g. whistleblowing procedures)
Article 11	Freedom of assembly & association (e.g. trade union recognition)
Article 12	Right to marry (e.g. pregnancy)
Article 14	Prohibition of discrimination (e.g. protected characteristic groups)
Protocol 1 Article 1	Protection of property (e.g. staff/prisoner property)
Protocol 1 Article 2	Right to education (e.g. accessible information)
<p>International Covenant on Economic, Social and Cultural Rights. Rights to:</p> <ul style="list-style-type: none"> <li>• Work in just and favourable conditions;</li> <li>• Social protection;</li> <li>• An adequate standard of living;</li> <li>• The highest attainable standards of physical and mental health; and</li> <li>• Education.</li> </ul> <p>• There are those that cannot use the in-cell phones, although we wouldn't necessarily consider it a breach of article 8 it would be something we wish to acknowledge. In mitigation prisoners can still have family contact through access to physical &amp; virtual visits. They can also access mail and email a prisoner services. For those who can't use the telephone SPS can also utilise the staff phones to access services for the deaf.</p>	
It will uphold human rights articles. <input checked="" type="checkbox"/>	
It will breach with human rights articles. <input type="checkbox"/>	

<p><b>When considering all your responses to Stage 3 if you selected <u>POSITIVE</u>:</b></p>	<p>Please move on to <b>stage 4</b> where you will be asked to provide details of the equality group(s) affected, the impact and evidence you considered.</p>
<p><b>When considering all your responses to Stage 3 if you selected <u>NEGATIVE</u>:</b></p>	<p>Please move on to <b>Stage 4</b> where you will be asked to provide details of the equality group(s) affected and the impact and strategies to mitigate the impact to a reasonable level, or to remove the impact altogether.</p>
<p><b>When considering all your responses to Stage 3 if you selected for ALL areas <u>NO EFFECT</u>:</b></p>	<p>Please justify your conclusions here and move directly to <b>Stage 5</b>.</p>

**Stage 4: Analysis of impact/outcomes**

You have indicated that this new/revised policy/practice will have an impact/outcome on one or more of the 3 main duties of the Public Sector Equality Duty and Human Rights articles for people in custody or staff. Use these sections below to indicate whether the impact is positive or negative, and justify your assessment using the data and evidence you have already gathered (via statistics, consultation, etc.)

**What are the positive impacts?**

Does the new/revised policy or practice: Advance equality of opportunity? Remove discrimination? Remove harassment? Remove victimisation? Foster good relations? Encourage participation by disabled people? Uphold human rights articles?  
Detail the positive impact here:

The use of in-cell telephony enhances the opportunity for those in our care to maintain contact with family members and friends thereby supporting individuals to maintain and, in some cases, increase contact with their local communities, all of which we know supports individuals through their time in custody.

There is a further benefit whereby family members and in particular, children will have the opportunity to be connected more closely to family members and parents who are held in custody. It is hoped that the use of in-cell telephony will enhance the contact and support between those in our care and key family members who in the wider community.

It should be noted that there are still all the safeguards in place to protect victims and witnesses, by logging and recording and the ability to monitor calls from prisoners' cells.



<p><b>Please select which group(s) will be affected by the positive impact, and provide details below each category:</b></p>
<p><input checked="" type="checkbox"/> <b>Age</b> (e.g. older people or younger people):</p> <p>Individuals of all ages will be positively supported using in-cell telephony.</p>
<p><input type="checkbox"/> <b>Race</b> (e.g. people from black or any minority ethnic groups):</p>
<p><input type="checkbox"/> <b>Sex</b> (e.g. women or men):</p> <p>.</p>
<p><input checked="" type="checkbox"/> <b>Disability</b> (e.g. people with visible or non-visible disabilities, physical impairments):</p> <p>Where any issues are identified for those with sensory or physical disabilities or impairments, digital and hardware solutions will be considered, and the most suitable option put in place which will support equality of service for all those in our care. There is a replacement handset available for prisoners with hearing difficulties which establishments can order from central stores.</p>
<p><input type="checkbox"/> <b>Gender reassignment</b> (e.g. changed/changing gender from that assigned at birth):</p>
<p><input type="checkbox"/> <b>Religion or Belief</b> (e.g. belonging to a particular religion/belief or no affiliation):</p>
<p><input checked="" type="checkbox"/> <b>Sexual orientation</b> (e.g. lesbian, gay, bisexual or heterosexual):</p> <p>The additional privacy of in-cell phones may be especially beneficial for prisoners from the LBG community as it offers more privacy than the gallery telephones.</p>
<p><input type="checkbox"/> <b>Maternity and Pregnancy</b> (e.g. pregnant/on maternity leave/breastfeeding):</p>
<p><input type="checkbox"/> <b>Marriage and civil partnership:</b></p>
<p><input checked="" type="checkbox"/> <b>Socio-economic groups:</b></p> <p>There is no assessed impact on different socio-economic group using in-cell telephony, however this will be continually monitored. It should be noted that all prisoners will continue to have 200 free minutes per month added to their account to make calls within the UK to support family contact and will positively support lower income families by lessening the financial burden on them supporting their loved one in our care. The phones will also allow for calls at any time of the day which will accommodate communication with family members who work different shift patterns.</p>
<p><input checked="" type="checkbox"/> <b>Human rights compliance</b> (e.g. civil, political, economic, social, and cultural rights):</p> <p>By introducing family contact in the privacy of one's own cell SPS is supporting those in our care which should have a positive effect on enhancing the protection of Article 8 rights (right to respect for private &amp; family life) as well as the right of everyone to the enjoyment</p>

of the highest attainable standard of physical and mental health of the International Covenant on Economic, Social and Cultural Rights. By introducing the hand set for hearing impaired prisoners SPS are ensuring equality of access for all in SPS custody.

**Inclusive Communications.** What consideration have you given to the communication needs of those who will be impacted by your policy/practice, and what steps are you taking to ensure your policy/practice will be easily understood by them? For example, accessible formatting of document, alternative formats such as Plain English, Easy Read, foreign language translations, BSL translation, etc.

Everyone entering custody undergoes a local induction regarding several topics including regime and service provision etc. The use of in-cell telephony will be discussed at this time. Information on the use of the devices and how to add/ delete numbers and add credit will be available in all residential areas. Information on how to use in-cell telephony will be made available in accessible formats including easy read and translations into foreign languages where necessary.

What are the negative impacts?

Does the new/revised policy or practice: Create any barriers or issues for people from an equality group? Discriminate against any equality group? Have a negative impact on community relations internally and/or externally? Reduce any equality groups' access to a service or any other aspect of prison life? Reduce any equality group entry or progression as a member of staff, breach human rights articles?

\*\*Any aspect of the policy/practice that has a negative impact must either be mitigated to a reasonable, objectively justifiable level, or abandoned altogether if this is not possible\*\*

Detail the negative impacts here:

On initial install, SPS did not have a solution for hearing impaired individuals however a solution has now been found that is suitable for those with partial hearing loss. No telephone solution has been found for those who are profoundly deaf yet but SPS is still making efforts to find a solution which offers parity with others. but. There was no evidence of other negative impacts, but the use of the phones will be monitored on an ongoing basis and adjustments made where necessary.

Inter-prison phone calls for those in custody who have family members also in custody will continue to be permitted and this is not changed by the introduction of in-cell phones. Permission to make a call to a family member in prison is granted by the prison's Governor and they may refuse a request where there are security or risk concerns or a risk to the good order of the prison(s) has been identified or for the prevention of crime or for the purposes of protecting the wide public. A refusal based on these criteria must be in line with Article 8 of the EHRC which states that the right can be interfered with for reasons of "national security, public safety ..., for the prevention of disorder or crime, for the protection of health or morals" (Article 8, ECHR) and in line with the law.

Please select which group(s) will be affected by the negative impact, and provide details of the negative impact and how you will mitigate against it below each category:

**Age** (e.g. older people or younger people):

There is no evidence of any negative impact on different age groups using in-cell telephony.

Where any issues are identified with the technology or hardware (handset), particularly for older people who may have sensory disabilities (see below under disability), different options will be considered which will support access to the service, such as a handset for those with limited hearing. The buttons on the handsets are already suitable for people who are blind or partially sighted.

**Race** (e.g. people from black or any minority ethnic groups):

There is no assessed impact on people from black or minority ethnic groups using in-cell telephony. It should be noted that foreign national prisoners will still be able to use £10 credit to call abroad on the in-cell phones, as is already available for in hall pin phones. Establishments must put a process in place to communicate and explain the use of the in-cell telephones to foreign nationals with limited English. There is awareness that for some foreign nationals this £10 may not go as far as it does for others due to high call costs to some countries. There is to be an options review regarding how contribution levels can be better distributed to achieve parity.

**Sex** (e.g. women or men):

There is no evidence of any negative impact on men or women using in-cell telephony but this will be monitored on an ongoing basis.

**Disability** (e.g. people with visible or non-visible disabilities, physical impairments):

Where any issues are identified, i.e. those with disabilities or physical or sensory impairments, digital and hardware solutions will be considered, and the most suitable option put in place which will support equality of service for all those in our care. A solution to support prisoners with hearing impairments has already been procured and put into place, utilising a more suitable handset. SPS does acknowledge that people who are profoundly deaf may struggle to use the new phones and SPS will continue to seek out a solution to this in order to achieve equality of access.

Safer cells currently do not have handsets due to the ligature risk involved however hands-free sets will be introduced which will mitigate this and ensure equality of access for those placed in these cells.

**Gender Reassignment** (e.g. changed/changing gender from that assigned at birth):

There is no evidence of any negative impact on those with the protected characteristic of gender reassignment using in-cell telephony, but this will be monitored on an ongoing basis.

**Religion or Belief** (e.g. belonging to a particular religion/belief or no affiliation):

There is no evidence of any negative impact on those with religion or belief using in-cell telephony, but this will be monitored on an ongoing basis.

<input type="checkbox"/> <b>Sexual orientation</b> (e.g. lesbian, gay, bisexual or heterosexual): There is no assessed impact on sexual orientation using in-cell telephony but this will be monitored on an ongoing basis.
<input type="checkbox"/> <b>Maternity and Pregnancy</b> (e.g. pregnant/on maternity leave/breastfeeding): There is no assessed impact on maternity or pregnancy using in-cell telephony but this will be monitored on an ongoing basis.
<input type="checkbox"/> <b>Marriage and civil partnership:</b> There is no assessed impact on marriage and civil partnership using in-cell telephony but this will be monitored on an ongoing basis.
<input checked="" type="checkbox"/> <b>Socio-economic groups:</b> There is no assessed impact on different socio-economic group using in-cell telephony, however this will be continually monitored but this will be monitored on an ongoing basis. As stated above there may be discrimination in the phone credit given to FNPs and the value of this compared to the 200 minutes UK nationals and others who have family in the UK are given, this is being explored and options assessed to achieve better parity. As the policy is now, some FNPs may be having to fund their own phone calls or may not be able to make as many calls because they cannot afford to top up the credit given to them.
<input checked="" type="checkbox"/> <b>Human rights compliance</b> (e.g. civil, political, economic, social, and cultural rights): There is no assessed negative impact on Article 8 - Right to respect for private & family life as well as the right of everyone to the enjoyment of the highest attainable standard of physical and mental health of the International Covenant on Economic, Social and Cultural Rights. The aforementioned issues for those in custody who are profoundly deaf are being mitigated through other forms of communication and contact and attempts to find a longer-term sustainable solution.

### Stage 5: Identifying options and course of action

<p><b>Recommended course of action: select relevant outcome and check the box when prompted:</b></p>
<p><b>Outcome 1:</b> Proceed – no potential for unlawful discrimination or adverse impact or breach of human rights articles has been identified.</p> <p><input type="checkbox"/></p>
<p><b>Outcome 2:</b> Proceed with adjustments to remove barriers identified for discrimination, advancement of equality of opportunity and fostering good relations or breach of human rights articles.</p> <p>Policy/practice addresses the intended outcome and is positive in its language and terminology. It advances equality and human rights as well as fosters good relations. The adjustments required for the hearing impaired have been noted and action taken to support this group.</p> <p><input checked="" type="checkbox"/></p>
<p><b>Outcome 3:</b> Continue despite having identified some potential for adverse impact or missed opportunity to advance equality and human rights (justification to be clearly set out).</p> <p><input type="checkbox"/></p>
<p><b>Outcome 4:</b> Stop and rethink as actual or potential unlawful discrimination or breach of human rights articles has been identified.</p> <p><input type="checkbox"/></p>



**Summary of outcome decision and any other recommendations**

Please provide summary here:

It is acknowledged that there were significant benefits to the introduction of prison-issue mobile telephones as part of the SPS response to the COVID-19 pandemic for people in custody. The use of these mobile phones supported those in our care to maintain contact with their families, friends, and communities which we know supports their journey through custody and reintegration back into the community. The progression to in cell telephony allows us to retain those benefits but with more robust safeguards in place.

The positive benefits of the provision of in-cell telephone hardware is referenced in the SPS Corporate Plan 2023-2028 as having the potential to "...vastly improve options and accessibility for maintaining relationships with families and communities, education and skills development and supporting health and wellbeing." The in-cell telephones should ultimately lead to improvements in service efficiency once the technology is further advanced to allow incoming calls from agencies such as NHS.

Through the work done in the initial cable to cell aspect of the project, it is anticipated that this will support the future development on in-cell prisoner digital services.

<p><b>Outline plans to action and review the impact of the new/revised policy/practice.</b></p> <ul style="list-style-type: none"> <li>Note: any evidence that raises concern would trigger an early review rather than the scheduled date.</li> <li>Indicate if there is any data which needs to be collected as part of action to be taken and how often it will be analysed.</li> <li>Indicate how the person responsible will continue to involve relevant groups and communities in the implementation and monitoring of the new/changed policy/practice.</li> </ul>	
<b>What:</b>	Monitor any impact on those with a physical disability, e.g. visual or age-related disabilities which may negatively impact individuals' ability to use the in-cell telephone.
<b>Why:</b>	To ensure that any issue identified can be mitigated at the earliest opportunity.
<b>Who:</b>	Operations Directorate, Public Protection Unit with input from the Head of Operations all establishments.
<b>When:</b>	On-going – to be reviewed on a quarterly basis
<b>Name of lead:</b>	Tony Martin, Operations Directorate, Public Protection Unit
<b>Date:</b>	
<b>What:</b>	Monitor the impacts of the in-cell telephony on those with other protected characteristics as well as impacts on human rights – this should include both negative and positive impacts.
<b>Why:</b>	To gather additional evidence on positive and negative impacts of the telephones and their use, allow for any negative impacts to be mitigated and add to the body of evidence about their benefits and positive impacts on outcomes, rehabilitation and experiences in prison
<b>Who:</b>	Tony Martin, Operations Directorate, Public Protection Unit
<b>When:</b>	Ongoing.
<b>Name of lead:</b>	
<b>Date:</b>	
<b>What:</b>	
<b>Why:</b>	
<b>Who:</b>	
<b>When:</b>	
<b>Name of lead:</b>	
<b>Date:</b>	