



HM Prison & Probation Service

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HM Prison and Probation Service
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Date: 8 October 2025

Dear Anne

Following our recent discussion, you requested some further information about our new policy framework for risk assessing individuals with lived experience who cannot be granted security clearance. You should since have received a letter from Andy Rogers, HMPPS Operational Security Group Director, confirming that we intend to publish this policy by the end of the calendar year. I have addressed the other queries you have raised below however, as discussed, please note that this is subject to internal governance and trade union consultation and so may be subject to further change.

Decision Making Framework

Due to the nature of lived experience pathways, there is no algorithmic decision-making framework. A list of excluded offences was developed last year for use with our Going Forward into Employment pathway. This was developed using the Cambridge Harm Index to ensure that exclusions are based on a recognised, evidence-driven methodology rather than subjective judgments or arbitrary thresholds. We also considered alignment with Civil Service values and the Ministry of Justice and HMPPS's priorities.

Recognising the breadth of non-directly employed roles that may require a role-specific risk management plan, the list of excluded offences has been revised for our Lived Experience Appointment Pathway (which will replace Standard Plus as our pathway for non-directly employed roles). Based on feedback received during consultation, we have introduced a 'Fixed, flex, free' approach to this list to allow further consideration of some offences that would previously have been considered excluded. This means that where more nuance may be appropriate, for example for individuals on life sentences or convicted of broad offences such as arson and breach of trust, a case-by-case approach will be taken.

For all cases where an excluded offence is not present, there will be a case-by-case consideration of the risk factors present, protective factors in place, and an assessment of whether HMPPS are able to manage and/or mitigate any risks or vulnerabilities. This will be carried out using a range of vetting checks, review of internal systems and review of any personal statements provided by, or on behalf of, the applicant. Due to the sensitive nature of some of the checks that may be undertaken, the highest level of security surrounds this process and it is not available for disclosure.

All information is compiled and analysed by the Personnel Security Countermeasures team, in collaboration with the managers in the area that the applicant is proposing to work, and presented to a multi-disciplinary panel for discussion and a decision. This panel will be made up of representatives from Security Vetting, Rehabilitation Directorate, MoJ Life Chances team and the recruiting area.

We will review our exclusion lists as part of broader policy reviews at six month intervals to ensure that these remain proportionate. These reviews will include consideration of lessons learned from successful appointments, stakeholder feedback, organisational risk tolerance and any relevant evidence published during that period. I would welcome any feedback from yourself and Clinks members as part of this process.

Consideration of time passed

Based on feedback from stakeholders and individuals with lived experience we have removed fixed timeframes on time passed since offending from our policy. A case-by-case consideration based on an individual's rehabilitative journey and readiness to re-enter the prison and/or probation environment will instead be made.

Appeals

Appeals will be limited to a review of whether the appropriate procedure was followed, for example, was someone incorrectly deemed ineligible for the pathway or did decision makers fail to consider appropriate ways to manage any risks identified.

This review will be carried out by an individual who was not involved in the original case. Where it is deemed that a procedural error has occurred, the case will be reconsidered by a panel of individuals independent of the initial decision.

Governor involvement

The relevant senior manager, or a delegate, will be invited to all decision-making panels. In the majority of cases, where they feel confident that they can manage or mitigate any identified risks, a role-specific risk management plan will be granted.

Where it is decided that the risk is not manageable, Governors and other senior managers will not have the discretion to overturn a panel decision and grant entry through a risk management plan. However, in such cases, access may still be possible through alternative, tightly controlled arrangements, for example, entering only as an escorted visitor. This ensures that risks remain fully contained, while allowing appropriate opportunities for contribution in a safeguarded environment. This is set out in the policy framework.

I hope you find this information useful and I look forward to more definitive information being shared when all policy governance is completed.

Yours Sincerely,

A handwritten signature in dark ink, reading "P. Copple". The signature is written in a cursive, flowing style. The "P" is large and loops around the "C". The "C" is also large and loops around the "o". The "p" is smaller and loops around the "p". The "p" is also large and loops around the "p". The "p" is also large and loops around the "p".

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Interim Chief Executive Officer