

Ruth Jones MP
Chair of the House of Commons Welsh Affairs Committee
House of Commons
London
SW1A 0AA

7 October 2025

Annwyl Ruth Jones MP,

Following our [joint](#) evidence submission to the Welsh Affairs Committee's *Prisons, probation and rehabilitation in Wales* inquiry in March, we write further in response to HM Chief Inspector of Prisons' [letter](#) to the Committee in June. Although HMIP's commitment to the Welsh language and to ensuring that prisons 'communicate effectively with all prisoners' is to be welcomed, their response to the Committee, particularly in relation to the design of a 'bespoke' survey for Welsh-speaking prisoners, raises several questions and concerns.

The purpose of this letter, therefore, is twofold. Firstly, by drawing upon our latest research findings informed by interviews with individuals with experience of monitoring Welsh language provisions in prisons, we wish to underline and reiterate the need for urgent action to improve accountability and scrutiny of the Welsh language in prison. This includes HMIP purposively sampling Welsh-speaking prisoners when inspecting prisons in Wales, and including survey questions dedicated to Welsh language services. Secondly, despite HMIP's suggestion that the responsibility for designing a 'bespoke' prisoner survey on the Welsh language should fall upon the Welsh Language Commissioner and the prison service, we would like to emphasise that this initiative should be directed and led by HMIP.

1. The need for bespoke survey questions on the Welsh language

Our joint evidence submission in March identified that, short of inspecting prisons directly or asking prisoners about their experiences, there is currently no way to independently gauge the consistency or quality of Welsh language provision within prisons. Our recent interviews with Welsh-speaking former prisoners and those involved in monitoring and scrutinising the Welsh language in prison, suggest that the external accountability mechanisms for the Welsh language in prison are ineffective and insufficient.

While official bodies like HMIP and Independent Monitoring Boards (IMBs) offer critically important insights on Welsh prisons, the language dimension tends to receive limited attention. According to our interviewees, the Welsh language is often seen as a ‘low-level’ issue for inspectors and prison visitors. This issue is compounded further by the fact that those carrying out visits or inspections ‘don’t ask the right questions’ about the language. The fact that Welsh prisoners, according to one scrutiny official, are often unlikely to ‘bang on about their Welsh language rights’ also means that their problems and experiences are unlikely to receive the necessary ‘exposure’ during visits or inspections.

In combination, these challenges present a Catch-22: inspectors do not ask about the language because prisoners do not raise it, but prisoners may not raise it because inspectors are not asking about it. Our latest findings, therefore, add further significant weight to the recommendation that HMIP take urgent action to improve accountability and scrutiny of the Welsh language by giving priority to the voices and experiences of Welsh-speaking prisoners. HMIP should purposively sample Welsh-speaking prisoners when inspecting prisons in Wales, and design and include ‘the right’ survey questions dedicated to Welsh language services. There should

also be an expectation on HMIP to include a dedicated section on the Welsh language, with the same issues covered consistently, in *all* of its inspection reports published on Welsh prisons.

2. HMIP leadership on improving scrutiny and accountability for the Welsh language

Prisoner surveys are a vital component of the prison inspection process in England and Wales. While giving a (much needed) voice to prisoners on matters surrounding their experiences, needs, and treatment, the analyses carried out by HMIP also allow for comparisons to be made across different population sub-groups. These include, to name a few, prisoners on remand compared to those who have been sentenced, prisoners who report having a disability to those who do not, as well as comparisons based on reported ethnic identity.

The questionnaires used during HMIP inspections are developed by HMI Prisons researchers (the most recent version in November 2023) to help support its ‘Expectations’. While some sections or questions included in the prisoner survey may be shared with partner organisations for their views or input, HMIP helpfully confirmed (via email) that all questionnaires used by inspectors are developed ‘in-house’. However, in response to the Welsh Affairs Committee’s letter in May where it was asked to consider including questions in its prisoner survey dedicated to the topic of the Welsh language, HMIP stated any ‘additional bespoke survey to gather information about Welsh language services...is something I suggest the Welsh Language Commissioner works directly with the prison service to develop’. This, however, raises a number of questions.

Given that HMIP ordinarily assume full responsibility for the task of designing the questionnaires it uses during inspections, it remains unclear why survey questions for Welsh-speaking prisoners should be developed differently to those used for other sub-groups in prison.

As an inspectorate independent from government, it is also unclear why HMIP deem it appropriate or necessary for the prison service to co-design the questions that will be included and used in its prisoner survey for Welsh speakers. Indeed, when asked by the authors if external organisations are invited to input into the process of survey design more generally, HMIP were unequivocal in stating that, while some organisations will be asked for their input, ‘this does not include MoJ or HMPPS’ (their emphasis).

Regrettably, HMIP’s response to the Committee’s letter suggests that they have not engaged seriously enough with the proposals to improve scrutiny and accountability for the Welsh language in prison. In light of the scrutiny problems we have identified in our most recent research, as well as the shortcomings associated HMIP’s proposal, we wish to repeat and underline our previous recommendation that HMIP should *lead* on the development and design of a ‘bespoke’ survey for Welsh-speaking prisoners alongside the Welsh Language Commissioner. Given our ongoing research in this area, we will be keen (and willing) to work with HMIP and the Welsh Language Commissioner throughout this process and to help facilitate further discussions on promoting scrutiny and accountability for the Welsh language in prison.

We would like to take this opportunity to thank you for your time in considering this letter. If you would like to discuss these matters further, please do not hesitate to contact us.

Yours sincerely,

Dr Robert Jones

Senior Lecturer in the Welsh Criminal
Justice System
Wales Governance Centre
School of Law and Politics
Cardiff University
CF10 3AX

Dr Gregory Davies

Lecturer in Law
School of Law and Social Justice
University of Liverpool
Liverpool
L69 7ZX