

Teresa Medhurst
Chief Executive
Scottish Prison Service

Via email: teresa.medhurst@sps.pnn.gov.uk

Date: 27 August 2025
Our Reference: SHRC202554

Dear Ms Medhurst

Access to Justice for Prisoners: The Complaints System

The Scottish Human Rights Commission has today published a new report, [Access to Justice for Prisoners: The Complaints System](#). A copy of the [Executive Summary](#) together with [copies in accessible formats](#) such as British Sign Language and Easy Read have also been published.

The report finds:

- Scotland's prison complaints system fails to meet human rights standards on access to justice and specifically does not meet the five key principles on prison complaints outlined by the European Committee for the Prevention of Torture (CPT), which require that all prison complaints systems be available, accessible, confidential, effective and traceable.
- The current system is inaccessible and complex and is not a realistic way of pursuing justice for many prisoners, particularly those with certain disabilities, with lower literacy, or people whose first language is not English.
- Fear and mistrust prevent many people in prison from pursuing complaints.
- The system does not support continuous learning or improvement and lacks transparency.

The SHRC therefore recommends:

- The Scottish Government must urgently review and reform the prison complaints system.
- Reform must be rooted in human rights and designed with input from people in prison and their families.
- The Guide to the Scottish Prison Rules, co-drafted by SHRC and Parkhead CAB, should be widely distributed, translated into different accessible formats and languages, and kept updated by the SPS/Scottish Government.
- Transparent, disaggregated data should be published on prison complaints to improve accountability and learning.

Further to the report being launched today, SHRC has recently co-produced a [Guide to Rights Under the Scottish Prison Rules](#) with Parkhead Citizens Advice Bureau and printed and published by the Scottish Prison Service. As you are aware, the Guide was launched at HMP Barlinnie on 31 July 2025. The support of the Scottish Prison Service was invaluable to the successful launch of the Guide and I trust it will be a helpful resource for both your staff and people in your care.

As is recommended in the above report, I welcome that the Scottish Prison Service has committed to making the Guide available to prisoners across Scotland, and their families. The Scottish Prison Service's commitment to translating the Guide into community languages, making it available in accessible formats, including British Sign Language and Easy Read, and keeping it updated is also welcome.

I look forward to hearing your reflections on our findings and recommendations and would welcome a meeting to discuss the report in early course.

Yours sincerely



Professor Angela O'Hagan
Chair, Scottish Human Rights Commission