

Sherry Ralph
Chair
UK National Preventive Mechanism

Via email: UKNPM@hmiprisons.gov.uk

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Dear Ms Ralph

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. The Guide was launched at HMP Barlinnie on 31 July 2025.

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

I look forward to hearing your reflections on our findings and recommendations and would be happy to discuss how the report may assist the work of the central NPM team or the wider NPM membership.

Yours sincerely



Professor Angela O'Hagan
Chair, Scottish Human Rights Commission