

Response from the Wales Probation Development Group to the consultation on the inspection of the Probation Service

May 2026

Thank you for the opportunity to respond to your consultation on your inspection of the Probation Service. This response is on behalf of the Wales Probation Development Group (WPDG), a subgroup of the Welsh Centre for Crime and Social Justice (WCCSJ). WCCSJ is a major initiative which brings together academics from seven Welsh universities to encourage inter-institutional collaboration to generate high quality, theoretically informed, policy-relevant research on crime and social justice in Wales and beyond. It also seeks to add value to policymaking and practice by fostering regular communication and debate between academics and members of governmental, public, private and third sector organisations.

Overall, we agree with the main direction of your proposals for changes to the inspection regime. Rather than answering each individual questions, we wish to emphasise five points for consideration:

1. Focus on the Sentencing Act: probation's work at Court

We agree with the intended focus on the implementation of the Sentencing Act given the major changes introduced through this legislation (Q1). However, we would also like to suggest the use of Artificial Intelligence as another area of focus (see point 2). We note your reference to 'multi-agency learning panels', and consider this presents a particular opportunity to engage with the judiciary, to receive open and transparent feedback from judges and magistrates on probation work at courts, pre-sentence and breach reports, feedback on specific cases and levels of communication given this critical relationship.

2. The use of Artificial Intelligence with probation work

We consider that an early inspection of the rollout of Artificial Intelligence including 'Justice Transcribe' would be both timely and appropriate (Q1, Q12). While it has been characterised as an administrative support tool, Justice Transcribe represents a significant operational change and may serve as a precursor to wider adoption of artificial intelligence within probation services. As HMPPS and MoJ seek to scale the use of AI, it is critical that the Inspectorate consider its implementation.

We understand that pilot schemes suggest that Justice Transcribe may deliver meaningful time savings. However, it is essential to establish how these efficiencies have impacted on the quality of practice. We think it will be relevant to consider appropriate use of AI tools within your standards on 'assessing' (Q2, Q6). For example, exploring whether the transcriptions have been properly reviewed, analysed and updated by officers to correct for mistakes, 'hallucinations' or filled gaps, even where the AI text may appear to offer some 'professional' legitimacy. The process of personally drafting assessments and reports has traditionally supported practitioners in forming early professional judgements and engaging

thoughtfully with individuals. It is necessary to assess whether, and how, the use of automated transcription tools alters this aspect of practice (Q2, Q8).

In relation to Justice Transcribe and other implementation of AI technologies we would therefore suggest considering their implementation along three areas of impact:

- Technical reliability - consideration of how well AI technologies work, what biases they may carry etc.
- Institutional and organisational fit – consideration of how AI technologies fit into current probation practices and whether they simply assist practice, replace humans in practice or disrupt practice.
- Normative legitimacy – consideration of how AI technologies may affect the core values and purposes of probation work. This needs careful assessment and the Inspectorate would be well placed to consider these important issues.

There are, of course, lower and higher risk technologies in this context, but there is a risk that the introduction of new technologies leads to a widening of inequalities and oppressive practices in probation which would be in clear tension with the Inspectorate's ambitions for probation practice.

More independent research is also needed in this area, however, in advancing this argument, we note that research undertaken by the Ada Lovelace Institute is relevant, particularly in relation to the broader implications of AI adoption for professional judgement, accountability, and public service delivery (see Bruff & Groves, 2026; Deshmukh & Davies, 2026), as well as comments made by Phillips (2026) and Nellis (2026).

3. The role of probation: relational and strengths-based practice and community-based working in Wales

We agree that the inspection standards should firmly align to evidenced-based practice and further concur with the intention to focus on relational practice and strengths-based practice (particularly given our earlier points) (Q2). Relational practice, for example, has a strong evidence base, as highlighted in research demonstrating the benefits of supervision skills (both relationship and structuring skills) to reduce reoffending (Raynor et al., 2014). However relational practices need to be situated in broader relational systems and services (see for example, the discussion on the probation professional register in Wales, in Deering et al., 2025). Within the Wales Probation Development Group, we have advocated for probation work to be more closely connected with devolved services and the voluntary sector, and delivered within local communities (see Borja et al., 2023; Raynor 2024; Rabaiotti, 2025; Rabaiotti et al., 2026). One promising example includes the 'Grand Avenues' scheme in Cardiff (see Thomas et al., 2026) and there has been interest in rolling out a community-hub based approach to probation delivery in Wales (for example, through a Memorandum of Understanding – see Irranca-Davies, 2026). Following the recent Senedd elections, we await to see continued ambitions around the devolution of probation. This will have relevance for both probation practice, but also the role of probation and its work with partners in Wales, both devolved and non-devolved.

This further connects to your question about the shift of language of 'keeping people safe' and 'contributing to community safety' (Q3). We agree with the move away from the

language of public protection, for the problematic reasons you point to, as expressed in McNeill's article, and agree that consideration around probation's broader partnership role in supporting 'safer communities' is appropriate. We suggest further consideration is required around the language 'keeping people safe' and 'community safety' (and hope the consultation responses will provide you with some useful reflections). For example, 'keeping people safe' is similar to 'safeguarding' which has particular connotations around the work of social services. Probation Officers, of course, were once social workers, and there could be grounds for realignment, particularly given their shared skills and values (see Canton, 2024). 'Community Safety' for many, refers to Community Safety Partnerships, which probation have not been as active in, as it was intended (not helped by the successive organisational turmoil) (see Rabaiotti & Harrison, 2023). Perhaps this is a good opportunity to help probation 'renew' its partnership working in the 'community safety' arena rather than the emphasis of its work in the 'public protection' arena. Engaging partners, practitioners and the public in understanding any language change will be important, especially given the continued emphasis in HMPPS communications around 'protecting the public'. It is also worth highlighting that 'keeping people safe' and 'contributing to community safety' inherently encompass the safety and wellbeing of individuals under supervision, in a way that the notion of 'public protection' does not.

Within this context, we note your emphasis on effective leadership and that this will be assessed through the cases you will assess. We consider that leadership should continue to be an important aspect of inspection. Our experience has shown that good practice innovations have often failed or been less than effective because of the top-down rigid 'tick box' requirements of top and local 'leadership'. Practitioners and voluntary sector colleagues suggest that leadership continues to be managed out of the process; it is difficult for a 'leader' to respond to local circumstances or opportunity and innovate. Research exploring implementation science supports this (see Fay Taxman for instance). Despite this, the leadership skills required at PDU level are at least, if not more important than at what used to be at Chief Officer level. Models for future probation in Wales, 'localism' in the form of devolved responsibilities, commissioning etc, will require significant leadership skills (and experience) in a variety of contexts, Courts, partnerships, as well as case oversight. Therefore, we hope your inspection of leadership will go beyond your reference to workloads and oversight.

4. Approaches to inspecting Integrated Offender Management

Relatedly, the consideration of further inspection of Integrated Offender Management (IOM) is worth highlighting (Q12). It is relevant to questions about strengths-based approaches and the importance of relational practice (Q2), the importance of partnership, the boundaries of probation and contributing to 'community safety' (paragraph 5.5 and Q3) and combining issues about desistance and engagement together rather than separately (Q5).

Our research (See Maguire et al., 2024 and Powell et al., 2024) indicates that the increased amount and variety/flexibility of types of contact that people on IOM have with both probation and police officers, much of it focused on building their strengths, leads to better engagement and more trusting relationships (Q2). This includes better engagement by IOM participants with the police officers who work with probation, often in co-located offices. In many cases the police role in IOM combines direct attention to the prevention of re-offending

(which is helped by information-sharing with probation) with contributions to rehabilitation through police adopting probation-like 'offender management' roles such as building personal relationships and facilitating access to pro-social activities and rehabilitative services. This, we suggest, gives support to the Inspectorate's proposals to expand the boundaries of what they look at (5.5 and Q3) and to combine inspections of desistance and engagement together (Q5).

5. National / regional inspections: the unique position of Wales

Finally, in considering inspections by region or nation, we would like to highlight that Wales, although classed as a 'region' in probation terms, is a country with particular context, ways of working and challenges, not least the 'jagged edge' of partial devolution (see Rabaiotti, 2025). We understand that the Inspectorate is cognisant of the needs around the Welsh Language for example. However, given probation is reserved to UK Government, whilst the levers to support desistance are devolved, particular attention could be paid by the inspectorate to the partnership landscape in Wales and how they impact on probation strategy and practice (Q12). This will become even more important given the case made for devolution of probation and the anticipated movement towards this in light of the Plaid Cymru manifesto.

6. Concluding points, contributors and contact details

To conclude, given that it is neither feasible nor necessary to inspect everything, we suggest the Inspectorate should focus on those features of practice and organisation which are known to make the most difference to outcomes. We hope that our response will assist with this thinking. Thank you once again for opportunity to comment on the proposed changes to the format and focus of inspections.

The particular members of Wales Probation Development Group who have contributed to and/or reviewed this response include: Ella Rabaiotti, Prof. Martina Feilzer, Prof. Mike Maguire, Brian Heath MBE, Ian Fox, Su McConnel, and Prof. Peter Raynor.

If you have any follow up questions on this response, please contact:

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