

June 2018



CLINKS
RESPONSE

Clinks response to the HM Government's consultation on transforming the response to domestic abuse

About this response

Clinks is the national infrastructure organisation supporting voluntary sector organisations working in the criminal justice system (CJS). Our aim is to ensure the sector and those with whom it works are informed and engaged in order to transform the lives of people in the CJS and their communities. We do this by providing specialist information and support, with a particular focus on smaller voluntary sector organisations, to inform them about changes in policy and commissioning, to help them build effective partnerships and provide innovative services that respond directly to the needs of their users.

We are a membership organisation with over 500 members, working in prisons and community settings, including the voluntary sector's largest providers as well as its smallest. Our wider national network reaches 4,000 voluntary sector contacts. Overall, through our weekly e-bulletin Light Lunch and our social media activity, we have a network of over 15,000 contacts. These include individuals and agencies with an interest in the criminal justice system and the role of the voluntary sector in rehabilitation and resettlement.

Clinks supports a network of women's centres and specialist women's services working in the CJS and has a key role in supporting and representing organisations that work with women in contact with the CJS. As well as supporting the sector with information resources and events, we sit on the Advisory Board for Female Offenders to share the sector's expertise with the MoJ. We also convene the Women's Networking Forums as part of the Reducing Reoffending Third Sector Advisory (RR3) Group, in partnership with Agenda; these bring together women's organisations to provide an opportunity to feedback on policy developments and foster partnership working within the sector.

We responded to the consultation, which was in survey form, and have reproduced our questions and answers below.

For more information about this response contact Jessica.Mullen@clinks.org

Supporting female offenders

13. How can we work better with female offenders and vulnerable women at risk of offending to identify their domestic abuse earlier?



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Please select your top three.

- Encourage the use of schemes which divert vulnerable women out of the criminal justice system (where appropriate) and into services
- ~~Improve availability of support for domestic abuse victims in prisons~~
- Support signposting into appropriate services for women who come into contact with the police
- Other – please explain

Introduction

Clinks welcomes the recognition in this consultation that domestic abuse is often a key factor in women's involvement in the criminal justice system (CJS). Women in Prison report that 80% of the women they work with have experienced domestic violence¹ and recent research by the Prison Reform Trust has identified experiences of domestic abuse and sexual violence as key drivers of offending for the majority of women involved in the CJS².

The Ministry of Justice's (MoJ) female offender strategy is currently being developed and Clinks, in consultation with our members, has made a number of recommendations to the MoJ on considerations for the strategy. A key recommendation was that the strategy should explicitly address and complement other relevant government strategies, particularly the Ending Violence Against Women and Girls strategy. In addition to this, we would like to emphasise the importance of a shared approach to domestic abuse across government and therefore the need to develop synergy between the MoJ's female offender strategy and the government's response to domestic abuse.

We want to focus on the prevention of involvement of women in the criminal justice system and the diversion of women to specialist support services. These approaches have been consistently emphasised by voluntary organisations delivering women-centred services as the most effective ways of supporting women affected by domestic abuse who come into contact with the CJS.

1. Encouraging the use of schemes which divert vulnerable women out of the criminal justice system (where appropriate) and into services

1.1 Early intervention

Clinks welcomes the consultation's focus on identifying the needs of women earlier on in the criminal justice process and providing appropriate support to address these. In consultation with Clinks, our members have highlighted the primary importance of diversion from the CJS for women who have experienced domestic abuse. This is supported by the Corston Report, which found that prison is disproportionately damaging and inappropriate for women with past experiences of trauma who have committed non-violent offences³. More recent research by the Prison Reform Trust finds that, "[C]riminalisation and particularly imprisonment compound the problems of women affected by abuse."⁴

We therefore suggest that the use of schemes to divert women out of the CJS is essential to providing appropriate support to women who have experienced domestic abuse. Desistance-based approaches to supporting women in contact with the CJS emphasise the importance of practitioner approaches that are sensitive to these adverse experiences of women. They highlight the need to address the impact of these experiences in order to prevent offending and re-offending. Clinks members which deliver women-centred services also point to the need for trauma-informed services and underline the risks of delivering generic services that do not effectively engage women.



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Clinks recommends that, in order to properly support victims of domestic abuse, the Ministry of Justice's female offender strategy should be thoroughly informed by desistance theory and research, emphasising the need for women in contact with the CJS to have access to services and practitioners that provide a holistic, flexible and person-centred approach, as offered through the voluntary sector's women-centred services. This principle should also be reflected across any government strategies for addressing domestic abuse, in recognition of the relationship between experiences of domestic abuse and involvement in the CJS.

1.2 Using a whole system approach

Clinks welcomes the MoJ's commitment to a whole system approach for women in contact with the CJS. The MoJ has taken a proactive role in raising awareness around and supporting the development of this approach, which it describes as "a multi-agency approach to address the often complex needs of the most vulnerable and disadvantaged women in society."⁵ While it is important that CJS agencies explore options for shared outcomes and collaborative activity around diversion for women with experience of domestic abuse, a whole system approach must involve agencies and organisations outside of the CJS. This is necessary to ensure that probation orders and prison sentences do not become the primary gateway for women with experience of domestic abuse to access support.

Clinks supports the Prison Reform Trust's recommendation that the government should invest in problem-solving, whole-system approaches to support early diversion and effective community solutions for women in contact with the CJS who are affected by domestic and sexual abuse, including out of court disposals.⁶

Cross-governmental collaboration and high-level strategic engagement with voluntary sector organisations is vital to developing early intervention that can avoid contact with the CJS altogether –addressing needs before the point of offending and preventing the hefty public (and human) costs associated with involvement in the CJS. For all women in contact with the CJS, particularly those who have experienced domestic abuse, access to women-centred services—focused primarily on the needs of the individual rather than their offending behaviour—is essential. Research has found that there are a number of reasons why women often do not disclose experiences of DA. These include women not recognising their own experiences as abuse, fears that they will not be supported, and concerns about their children being taken into care⁷.

It is vital that women have access to voluntary sector services with the expertise to identify histories of domestic abuse and can provide specialist support to help women escape abusive situations, as well as to address the impact of abuse. As this consultation acknowledges, women's centres are a key part of the whole system approach. Women's centres have expertise in the needs of vulnerable women and what works to support them; their gender-specific community services can support prevention and diversion. A recent Prison Reform Trust finding shows that they are also hugely cost effective in comparison to imprisonment:

"The annual cost of detaining a woman in prison for a year in is in the region of £38,000 - £46,000, compared to an average cost of £2,800 for a community order and approximately £1,500 for support in a women's centre." – Prison Reform Trust⁸

Investing in the sustainability of women's centres is essential to ensuring that women who experience domestic abuse do not experience criminalisation due to the impact of abuse and are able to access holistic support services.



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2. Supporting signposting into appropriate services for women who come into contact with the police

Liaison and Diversion schemes have been significantly developed across England and Wales over the past two years and have played an important role in improving support to people in contact with the CJS who have mental health needs. These schemes could be a useful avenue for earlier identification of women who have experienced domestic abuse and it is therefore important that these services are able to respond to the specific needs of women in the CJS.

Currently, some generic Liaison and Diversion schemes have low engagement rates for women. In some areas this has led police, health services and voluntary organisations to develop gender-specific pathways within Liaison and Diversion services that proactively address the specific and multiple needs of women. These services tend to focus on needs rather than offending histories, meaning that Liaison and Diversion practitioners will assess each woman coming into contact with the CJS rather than requiring a referral from a custody sergeant.

Many Liaison and Diversion schemes automatically refer those with experience of domestic abuse to support services. However, this is not yet standardised. Clinks welcomes the work being done by the national Liaison and Diversion scheme to develop pathways into services for those who have experienced domestic abuse. We also support Together for Mental Wellbeing's and the Prison Reform Trust's recommendation that police guidance and training must include a specific focus on the links between domestic abuse and some women's offending.⁹

Clinks recommends that the MoJ works closely with the Department of Health and Social Care to ensure that all Liaison and Diversion services across England and Wales include a requirement for a gender-specific worker or service.

It is important to note that many women who offend will not come into contact with the police. Women who commit debt offences, for example, often come into contact with the CJS at the court stage. Debt and fraud offences can often be indicators of domestic abuse for women and it is therefore important that Liaison and Diversion schemes are expanded beyond police forces to courts in order to ensure that all women coming into contact with the CJS have their needs assessed and appropriate support offered to them.

3. Other

3.1 Responding to the needs of women with additional protected characteristics

Clinks recommends that government strategy to address domestic abuse should consider and proactively address the needs of women with additional protected characteristics under the Equality Act 2010.

Black, Asian and minority ethnic (BAME) women are strongly over-represented in the CJS. For example, black and mixed ethnic women are more than twice as likely as white women to be arrested, BAME women are more likely to be committed to Crown Court than non-BAME women and black women are 25% more likely than white women to be sentenced to custody at Crown Court¹⁰. Due to the extent of this disproportionality and the strong evidence base available on this topic, this section of our response is focused on this group.

A recent report by Women in Prison and Agenda highlighted the discrimination and additional barriers experienced by BAME women in the CJS. It found that at all levels of the CJS many BAME women experienced overt racism from CJS staff, felt as though they were treated differently to their non-BAME counterparts and found that their specific needs were not met¹¹. This is supported by evidence from the Lammy Review interim report, which demonstrates disproportionality and poorer outcomes for BAME

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women at arrest stage, in sentencing and relating to experiences in prison¹².

The report also discusses the need for women's provision to meet the specific needs of some BAME women, such as overcoming cultural stigma around CJS involvement and language barriers. It suggests that additional training for staff may be necessary and that women should have access to culturally and religiously sensitive support in prison and in the community. This is essential to ensure that BAME women who have experienced domestic abuse are able to disclose this experience and to access appropriate support services to prevent further involvement in the CJS.

Research by Imkaan shows that BAME women who have experienced domestic and sexual violence are more likely to access specialist BAME organisations and report feeling safer to speak about their experiences of violence in an environment where staff have the knowledge and expertise in providing specialist support to vulnerable BAME women. Their report notes that a large number of specialist organisations for BAME women with experience of domestic or sexual violence have closed or been absorbed by larger providers in recent years.

"Where this has taken place, these 'culturally specific services' lose their autonomy, become part of a suite of services offered by a large, single provider and become delinked from the specialist BME [black and minority ethnic] women's sector (and movement)." – Imkaan¹³

In order to meet the needs of BAME women in or at risk of involvement with the CJS, it is vital that specialist services with expertise in the specific needs and experiences of BAME communities exist and are sufficiently resourced to provide support to all women who may wish to access a specialist service. This is increasingly important given that Clinks' most recent State of the Sector survey highlights that 30% of specialist BAME organisations report they are at risk of closure, compared to 5% of non-specialist organisations. In addition 24% of BAME and women's organisations report that they never receive full cost recovery on contracts¹⁴.

Voluntary organisations have also raised concerns about the under-reporting of crimes against Eastern European and BAME women due to a lack of trust in the police and other CJS agencies, making them increasingly vulnerable to domestic abuse and exploitation. Organisations are particularly concerned about punitive immigration regulation and enforcement being used disproportionately against women from refugee and migrant communities, with CJS agencies viewing them as offenders rather than victims.

This has been confirmed by reports of the Metropolitan Police reporting victims of crime, including victims of domestic abuse and sexual violence, to the Home Office for potential immigration breaches^{15 16}. The recent difficulties of the Windrush generation highlight the possibility of these problems also impacting non-migrant BAME women. This punitive approach to women from refugee and migrant communities hinders strategies to address domestic abuse, sexual violence and trafficking by preventing women from accessing the CJS as victims and making them more likely to be caught up in the CJS unnecessarily.

3.2 Involving service users

It is important to recognise the value of service user involvement in developing effective, evidence-based policy at all levels of the CJS. Any government strategy or policy to address domestic abuse should include an ongoing commitment to the strategic engagement of women with lived experience of the CJS and with experience of domestic abuse, as well as an outline of how this will be achieved.

The voluntary sector has a strong track record in involving service users in both strategy development and service delivery, which demonstrates the value of service users' expertise



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in designing services that reflect and meet the needs of those who use them.

Clinks' and Revolving Doors Agency's guide to service user involvement and co-production provides more information about how to embed service user involvement through an organisation or decision-making process. Organisations such as User Voice support organisations and agencies such as government bodies to engage service users in their decision-making processes in order to improve their services as well as their links with the communities affected by their decisions. Government departments should engage with these organisations in order to hear the views of service users on any strategy to address domestic abuse.

14. How can we make greater use of women-specific services to deliver interventions in safe, women-only environments?

- Availability of a GP at women-only services
- Availability of a nurse at women-only services
- Child contact sessions so that women who are not living with their children can have supervised access to their child
- Delivery of health interventions such as mental health and substance misuse treatment at women-only services
- DVAs located or linked to women-only services
- Improving access to benefits, finance and accommodation advisors at women-only services
- Provision of employer interventions at women-only services to help individuals become work ready, including offering work experience and/or mentoring
- Other – please explain

8. Other

As discussed in our previous answer, women-centred services led by the voluntary sector are flexible, holistic and focus on the needs of each service user. This presents opportunities for partnership work with statutory services and other voluntary organisations, as well as for co-location of services. However, service-user need and local systems can vary widely from area to area, creating differing opportunities and barriers for collaboration in every locality. It is therefore important that specific developments around partnership work and the co-location of voluntary and statutory services are not prescribed by national government but led by local stakeholders to ensure they meet the needs of the local population.

Clinks recommends that the government engages in ongoing consultation with the voluntary sector about making greater use of women-specific services to address domestic abuse. This will enable departments to gain a better understanding about what works in different localities to address domestic abuse for women in contact with the CJS and to offer best practice examples to both statutory and voluntary organisations.

8.1 Engagement with voluntary organisations delivering women-centred services

The voluntary sector has led the way in developing and delivering women-specific services in safe women-only environments. Organisations delivering women-centred services have a wealth of expertise on what works to support women in contact with the criminal justice system, how to prevent and address domestic abuse and how government can best foster and support this work. It is essential, therefore, that the government engages in ongoing strategic consultation with voluntary organisations delivering women-centred services.

Clinks supports a network of women's centres and specialist women's services working in the CJS and has a key role in supporting and representing



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organisations that work with women in contact with the CJS.

We also convene the Women's Networking Forums as part of the Reducing Reoffending Third Sector Advisory (RR3) Group, in partnership with Agenda; these bring together women's organisations to provide an opportunity to feedback on policy developments and foster partnership working within the sector.

Clinks recommends that government departments utilise Clinks to engage in early and ongoing consultation with the voluntary sector delivering women-centred services on government responses to domestic abuse.

8.2. Cross-departmental strategy for the sustainability of holistic women's services

Due to their holistic nature, the work of women-centred services contributes to improved outcomes for a range of government departments. These services and their service users are also impacted by the decisions of multiple departments.

Clinks recommends that the government should develop a strong cross-departmental strategy for the long-term financial sustainability of holistic services provided by women's centres, with leadership for this located in one department.

Without a clear location of responsibility for the development of this work, it is possible that agencies both within and outside of the CJS will continue to focus on the delivery of their statutory duties over preventative strategies and holistic approaches that take wellbeing, including factors such as domestic abuse, into account.

The biggest issues currently facing women's centres are access to sustainable funding, and commissioning processes that hinder multi-agency partnership work. Women's centres receive funding from a range of different sources to support their approach. Volatility in funding from voluntary sources coupled with reductions in funding from local authorities, often creates difficulties in creating sustainable services.

Clinks' State of the Sector reports have demonstrated that shifting from grant funding to contractual funding is frequently problematic for small and medium voluntary organisations due to the resource-intensive nature of the bidding process, the need to evidence contractual outcomes and the difficulties in securing full cost recovery¹⁷. Contractual funding can be particularly challenging for women's centres due to the holistic nature of their work. Stringent outcome requirements can restrict the ability of women's centres to respond to the individual needs of their service users and to work with a wide range of women. In particular, women's organisations have told Clinks that contractual restrictions often prevent them from engaging in initial outreach activities, such as meeting women on release from prison at the prison gates, in order to build trusting relationships¹⁸. Long-term and flexible grant funding may be a more appropriate way to maintain the ability of women's centres to provide prevention, diversion and resettlement work through a one-stop-shop model.

The MoJ's whole system approach female offenders grant funding scheme provides a good practice example of seed-funding. The scheme made grant funding available to organisations to provide multi-agency work that supports women already in the CJS and those at risk of CJS involvement. This is an effective way of providing resources to allow women's organisations to fill in the gaps in support for women with multiple needs and develop partnership between services through a localised approach.

Despite the positive achievements of this scheme, consistency across England and



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Wales is still an issue, with many areas lacking the level of provision needed to make a bid in the first place. Clinks believes that the scheme would benefit from voluntary sector engagement earlier on in the process to advise the MoJ on their grant-making process. It is also vital that this funding is distributed in a way that encourages long-term sustainability and supports those organisations with the most expertise and strongest track record of supporting women in contact with the CJS. The MoJ should engage with voluntary sector organisations delivering women-centred services to explore the best ways of achieving this.

Clinks recommends that the MoJ expands the whole system approach female offenders grant funding scheme, with a focus on developing services in areas lacking women's centres.

The Transforming Rehabilitation (TR) probation reforms have also significantly impacted the voluntary sector supporting women. Women's organisations that were successful in securing contracts with probation services have raised concerns that the level of funding provided under these contracts is insufficient to provide a high-quality service. Women's organisations that were unsuccessful are struggling to replace this funding and are often continuing to receive referrals from probation services, despite not being funded by them. Our most recent trackTR report shows that specialist women's organisations are more likely than other Community Rehabilitation Company Funded services to report having to subsidise services with their own reserves or with other funding sources.¹⁹

Organisations who were commissioned by CRCs told Clinks that they are often required to measure their performance according to the volumes of women they worked with and for how long. This masks the other ways specialist women's organisations and projects work to measure their performance such as through measuring increases in a woman's confidence and resilience, for example. Organisations are also prevented from providing women with access to additional specialist support services as this is identified as 'double counting' by CRCs. We were told that some CRCs are commissioning short interventions, which do not allow organisations to deliver the holistic person-centred services they know work particularly well for women. In some cases, women's organisations previously delivering resettlement work have decided against contracting with CRCs due to the quality of the service specification.

It is of concern to Clinks that organisations with a strong track record in delivering effective women's services have in some cases felt unable to take on contracts without compromising the quality of their work. Developing and implementing a sustainable funding strategy is not just important in expanding the women's-centre model, but is vital in order to ensure the protection of existing services.

The challenges for voluntary organisations discussed above have already led to the closure of four women-centred services between 2015 and 2017 and there is continued risk of the loss of effective services and existing expertise. This would not only be highly detrimental to the lives of many women experiencing domestic abuse but would also lead to higher numbers of women entering prison and a need to re-develop approaches to support women from scratch, incurring short-term and long-term costs for the MoJ.

When developing ways of engaging with voluntary organisations delivering women-centred services, it is important that government departments consider the financial pressures affecting these organisations and the impact this can have on their ability to engage at a strategic level. Departments should endeavour to engage with voluntary organisations in ways that are suitable for the organisations. For example, utilising infrastructure organisations such as Clinks and other local infrastructure organisations can reduce the burden on individual organisations, while government officials travelling

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to where women's services are located can reduce travel costs for organisations.

Working with perpetrators to change their behaviour

56. What more could be done to work with perpetrators in prisons, particularly offenders who receive a sentence of less than 12 months and do not have sufficient time to complete a domestic abuse programme in custody?

As outlined in the consultation, a number of voluntary sector organisations deliver interventions to prevent harmful behaviour by perpetrators of domestic abuse. These interventions may include educational programmes, therapeutic work and victim awareness courses. As these organisations are embedded in local communities, they can be particularly effective in working with people on short sentences, as they are able to provide through-the-gate continuity and work with service users after their release from prison. However, voluntary organisations often have significant difficulties accessing service users in prison in order to engage them in interventions.

Issues such as staff shortages, slow security vetting processes and siloed working can prevent voluntary organisations from building positive relationships with prisons or from carrying out their work after having built a partnership. Clinks' recent report, *The Good Prison*, makes recommendations for good engagement with the voluntary sector in order to achieve better outcomes for people in prison and in the community after release. The report explains how having a single point of contact within the prison to act as a co-ordinator for partnerships with the voluntary sector leads to more joined-up work and better services operating within the prison and through the gate.

Clinks recommends that the MoJ and HM Prison and Probation Service (HMPPS) explore the full potential of the voluntary sector in providing interventions for perpetrators of domestic abuse serving short sentences. We re-iterate our recommendations from *The Good Prison* report that HMPPS should advise prisons to secure and support a single point of contact to co-ordinate the voluntary sector and that HMPPS should make funding available to support the coordination of the voluntary sector in prisons.

57. What more could be done to work with perpetrators in the community (convicted or non-convicted) to change their behaviour?

The voluntary sector has led the way in developing and delivering interventions to work with perpetrators of domestic abuse in the community. Organisations such as Respect, Circles UK and WomenCentre work to hold perpetrators to account for their actions, to prevent them from engaging in abusive behaviour and to support them to build healthy, non-violent relationships. Circles UK, for example, provide mentoring support to men who have been convicted of sexual offences to prevent them from reoffending and help them to reintegrate responsibly into the community. They work in partnership with police, probation services local Multi Agency Public Protection Arrangements and other professionals working in the field of child protection to monitor risk and ensure that safeguarding concerns are addressed immediately. A 2015 evaluation of the organisation's work found that out of the 38 service users in the study, only one was re-convicted in the four years since being supported by a 'circle'. Positive outcomes were also achieved for other service users, including reductions in: reckless behaviour, sexualised attitudes towards children and hostile attitudes to women.²⁰

Another example is the Maze Project in Bradford and Calderdale, delivered by WomenCentre, which provides a domestic abuse prevention programme for adult men who are using any form of domestic abuse in their intimate relationships. The organisation also offers



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one to one sessions for women using domestic abuse. The intervention supports men to recognise their abusive behaviour and to find non-abusive alternatives to this, with the ultimate aim of reducing risk of harm to their (ex)-partners and children. WomenCentre emphasises the need for flexible ways of working that address the specific behaviours and context of each individual, as well as the importance of being led by the partners of perpetrators where possible. The Maze Project provides a partner support worker to support the partner of anyone engaging in the project. An evaluation of the Maze Project in Calderdale found that where men successfully engaged with the project, there was evidence of behaviour change and associated improved outcomes for women and children as the risk of further harm from domestic violence was substantially reduced.²¹

Clinks recommends that government departments utilise the expertise of the voluntary sector in developing strategies to support work with perpetrators in the community to change their behaviour.

Clinks shares concerns raised by the Standing Committee for Youth Justice (SCYJ) about the lack of clarity over whether the government will use a distinct approach for children accused or convicted of domestic abuse.

“Child perpetrators of domestic abuse are therefore likely to be vulnerable, as is the case for the majority of children in trouble with the law more widely, and they should be dealt with as such.” – SCYJ

Clinks supports SCYJ's recommendation that the government should acknowledge the distinction between child and adult perpetrators of domestic abuse, and create statutory definitions, programmes and justice responses accordingly.



End notes

1. Women in Prison, (2018). Key facts. [online] Available at: <http://www.womeninprison.org.uk/research/key-facts.php> (last accessed: 30th May 2018)
2. Prison Reform Trust. (2017). "There's a reason we're in trouble" Domestic abuse as a driver to women's offending. Online: http://www.prisonreformtrust.org.uk/Portals/0/Documents/Domestic_abuse_report_final_lo.pdf (last accessed: 30th May 2018)
3. Home Office. (2007). The Corston Report. Online: <http://webarchive.nationalarchives.gov.uk/20130206102659/http://www.justice.gov.uk/publications/docs/corston-report-march-2007.pdf> (last accessed: 30th May 2018)
4. Prison Reform Trust. (2017). "There's a reason we're in trouble" Domestic abuse as a driver to women's offending. Online: http://www.prisonreformtrust.org.uk/Portals/0/Documents/Domestic_abuse_report_final_lo.pdf (last accessed: 30th May 2018)
5. Ministry of Justice. (2016). Whole system approach female offenders grant funding scheme 2016. Online: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/566973/wsa-grant-specification-of-requirements.pdf (last accessed: 30th May 2018)
6. Prison Reform Trust. (2017). "There's a reason we're in trouble" Domestic abuse as a driver to women's offending. Online: http://www.prisonreformtrust.org.uk/Portals/0/Documents/Domestic_abuse_report_final_lo.pdf (last accessed: 30th May 2018)
7. South East Wales Women's Aid Consortium. (2011). Domestic Abuse & Equality: Older Women. Online: <http://www.equalityhumanrights.wales.nhs.uk/sitesplus/documents/1120/Domestic%20Abuse%20Equality%20D%20Older%20Women%2028SE%20WAlEs%20Women%27s%20Aid%29.pdf> (last accessed: 30th May 2018)
8. Prison Reform Trust. (2017). Fair Cop? Improving outcomes for women at the point of arrest. Online: <http://www.prisonreformtrust.org.uk/Portals/0/Documents/Women/Fair%20Cop.pdf> (last accessed: 30th May 2018)
9. Together for Mental Wellbeing and the Prison Reform Trust. (2018). Responding to the needs of women in the criminal justice system. Online: <http://www.prisonreformtrust.org.uk/Portals/0/Documents/Women/Responding%20to%20the%20needs%20of%20women%20in%20the%20criminal%20justice%20system%20evaluation%20January%202018.pdf> (last accessed: 30th May 2018)
10. Ministry of Justice. (2016). Black, Asian and Minority Ethnic disproportionality in the Criminal Justice System in England and Wales. Online: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/639261/bame-disproportionality-in-the-cjs.pdf (last accessed: 30th May 2018)
11. Women in Prison and Agenda. (2017). "Double disadvantage": The experiences of Black, Asian and Minority Ethnic women in the criminal justice system. Online: <https://weareagenda.org/wp-content/uploads/2017/03/Double-disadvantage-FINAL.pdf> (last accessed: 30th May 2018)
12. Ministry of Justice. (2016). Black, Asian and Minority Ethnic disproportionality in the Criminal Justice System in England and Wales. Online: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/639261/bame-disproportionality-in-the-cjs.pdf (last accessed: 30th May 2018)
13. Imkaan. (2016). Capital losses: The state of the specialist BME ending violence against women and girls sector in London. Online: https://drive.google.com/file/d/0B_MKSoEcCvQwdjJXQm5GVDBISmM/view (last accessed: 30th May 2018)
14. Clinks. (2017). The state of the sector. Online: https://www.clinks.org/sites/default/files/basic/files-downloads/clinks_sos-2017-recommendations_final.pdf (last accessed: 30th May 2018)
15. Evening Standard, (2017). Met Police criticised for handing victims of crime to Home Office over immigration status. [online] Available at: <https://www.standard.co.uk/news/crime/met-police-criticised-for-handing-victims-of-crime-to-home-office-over-immigration-status-a3508146.html> (last accessed: 30th May 2018)
16. Metro, (2018). Police are handing rape and domestic violence victims over to immigration officials. [online] Available at: <http://metro.co.uk/2018/05/14/police-are-handing-rape-and-domestic-violence-victims-over-to-immigration-officials-7544091/> (last accessed: 30th May 2018)
17. Clinks. (2017). The state of the sector. Online: https://www.clinks.org/sites/default/files/basic/files-downloads/clinks_sos-2017-recommendations_final.pdf (last accessed 30th May 2018)
18. Clinks. (forthcoming). Notes of the Women's Networking Forum, 8th May 2018.
19. Clinks. (2016). Change & challenge: the voluntary sector's role in Transforming Rehabilitation. Online: http://www.clinks.org/sites/default/files/basic/files-downloads/clinks_track-tr_changechallenge_final-web.pdf (last accessed 30th May 2018)
20. Tammy Banks, Rebecca Milner and Amii Hough. (2015). Evaluating Yorkshire and Humberside Circles of Support and Accountability 2011 - 2015: Core members, volunteers & partnership working. Online: <https://re-shape.org.uk/images/content/general/YHCOSA%20Evaluation%20Final.pdf> (last accessed 30th May 2018)
21. Sue Peckover (2010). The MAZE Project in Calderdale: An Evaluation. Available on request.



Clinks supports, represents and advocates for the voluntary sector in criminal justice, enabling it to provide the best possible opportunities for individuals and their families.

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