

December 2018



CLINKS  
RESPONSE

# Clinks' response to the Youth Justice Board's proposals for standards for children in the youth justice system 2019

---

## About Clinks

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 enable people to transform their lives. 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 500 members, including the voluntary sector's largest providers as well as its smallest. Clinks also manages the National Criminal Justice Arts Alliance, a network of over 900 artists and arts organisations who work to ensure arts and cultural opportunities are available to those in criminal justice settings. 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 CJS and the role of the voluntary sector in rehabilitation and resettlement.

## About this response

We welcome the opportunity to feedback on the draft *National Standards for Children in the Youth Justice System 2019*. To inform our response we have drawn on our ongoing work with - and evidence gathered from - the sector, as well as consultation we undertook to inform our submission to the Taylor Review of the youth justice system.<sup>1</sup> This included five consultation events with voluntary sector organisations across England and Wales, including one with organisations supporting black, Asian and minority ethnic (BAME) people. Two special consultation events were also held with NACRO and Peer Power, to hear the views of young people with experience of the youth justice system.

Our submission provides an initial overview, focusing on the 'Principles, oversight and monitoring' section set out in the standards, as well as two areas of importance to Clinks and our members – the role of the voluntary sector and addressing inequality in the youth justice system. Following this we provide specific consideration of each of the five standards set out by the Youth Justice Board (YJB).

## Overview

### Principles, oversight and monitoring

Clinks warmly welcomes the underpinning principles for the national standards to prioritise the best interests of children and the recognition



## CLINKS' response to the Youth Justice Board's proposals for standards for children in the youth justice system 2019

December 2018

given to the stigma that can come from children's contact with the justice system. The principles set strong aspirations for diversion, minimal intervention and promoting children's individual strengths. In particular we welcome the principle of 'child first, offender second' underpinning the work of all youth justice agencies.

This is an important step towards the recommendation Clinks made in its response to the Taylor Review that a clear, evidence based theory of change - a set of core welfare-based principles, rooted in full adoption of the United Nations Convention of the Rights of the Child (UNCRC) and a model of desistance appropriate to children and young people - is needed for youth justice.

We recommend that the YJB consider how these principles might be built upon in order to take a theory of change approach. Without this, as they currently stand, there is a risk that the desired outcomes for children of reducing reoffending and living 'crime free lives' will encourage a focus on binary reoffending outcomes rather than striving for welfare and wellbeing outcomes for children. For instance, the focus in many parts of the standards is on managing and assessing risk, which could lead to practices that undermine the 'child first' principle. A theory of change approach, as we suggest, would ensure that the reducing the risk of reoffending and living 'crime free lives' outcomes are framed within a proper understanding of desistance theory within which children's welfare and wellbeing would be an essential, mutually supportive and complimentary element.

We are also pleased to see principles that encourage children's active participation and meaningful collaboration. One of the key issues raised in our consultation events with young people was the need for the youth justice system to do more to listen to, and act upon, children's views and experiences and empower them to be involved in decision-making. We would like to see the standards for each stage of the system reflect these principles better. We recommend clearer, positive and more focused outcomes around children's engagement, which build on their skills and educational achievements, and incorporate consideration of their health and wellbeing.

As a long-term goal for the youth justice system we welcome the move away from process-driven requirements to an approach which emphasises outcomes. Striking the balance between a meaningful outcomes based approach and assuring quality and delivery of minimum standards is difficult to achieve. We feel that the revised national standards have not fully achieved this and we are concerned about whether key parts of the youth justice system are established enough and ready to move away from process management. There are some key issues within the system that youth justice agencies have not yet been able to address sufficiently or achieve significant improvements in. This includes the environment and regimes in secure settings and the disproportionate outcomes for BAME children. The persistence of these issues suggests that agencies require more direction and clarity to guide their strategic and operational services.

Given our concerns about the readiness of the youth justice system for an outcomes based approach, we are additionally concerned that the individual standards as currently proposed are vague. They lack specificity and clarity around the outcomes and their expected quality and this will hinder implementation of an outcomes-focused approach. The document uses subjective indicators such as 'sufficient', 'effective', 'suitable' and 'YJB-approved' but does not clarify what counts as each of these. This leaves them open to wide interpretation and gives a significant amount of discretion.

The ambiguity poses significant challenges for putting the standards into operation and for holding agencies to account. We are particularly concerned about this given that this revised document represents a significant reduction in the number and detail of the standards. To ensure improvements in the youth justice system and consistency in how outcomes are measured, more guidance is needed on what a good outcome looks like. More clearly defined outcomes will provide greater transparency and promote more consistent and good-quality practice.

## **The role of the voluntary sector**

The standards make no mention of the voluntary sector despite the vital role played by charities, social enterprises and community organisations in youth justice. In many instances voluntary organisations can have more impact on young people than statutory services; they often have more flexibility and space to be creative and tailor interventions to the needs of the individual. Practitioners from voluntary organisations may also be able to build more stable, trusting, positive relationships with young people as they are not viewed as part of the 'official' system and are not involved in enforcement. Smaller voluntary sector organisations in particular have a great deal of local expertise and community connections, providing an ideal route for young people to re-connect with, and develop a stake in, their local communities.

As such the voluntary sector is an important partner for youth justice agencies to ensure a youth justice system that meets the underpinning principles laid out in the document. Effective partnerships with the sector will help build supportive relationships, encourage children's engagement and wider social inclusion, promote childhoods removed from the justice system and empower children to fulfil their potential.

However, in our work with the voluntary sector, organisations often report feeling undervalued and the scope for them to be key strategic partners in the design and delivery of services is underestimated. Given the vital role that voluntary organisations can play, we recommend including in each of the standards a requirement for mechanisms to be in place for engagement and partnership working with the voluntary sector.

More clearly defined and positive outcomes focused on children's development, wellbeing and welfare would also promote better engagement with the voluntary sector. It would make it clearer where their services can contribute, thus providing stronger wraparound support for children. The Standing Committee for Youth Justice has highlighted in their response evidence of risk-philosophy and inadequate understanding of desistance-thinking at the local level, which can undermine attempts to embed a desistance-approach in practice. The voluntary sector has pioneered desistance based services and this knowledge and expertise should be utilised by statutory services.

## **Tackling inequality**

Given the extent of disproportionate numbers and/or unequal outcomes experienced by children with characteristics protected under the Equalities Act (2010), the statement regarding disproportionality in the youth justice system needs significant strengthening to adequately address those persistent inequalities.

In addition, the individual standards do not sufficiently address the impact of interventions on children with protected characteristics and their unequal outcomes. The YJB should recognise in its standards the need for specific strategies for targeted preventative and diversionary action in relation to these groups of children to reduce their criminalisation and the negative impact that exposure to the youth justice system has on them. Where they have not been diverted, more action must be taken to ensure they are better supported on community sentences, in custody and on resettlement.

The national standards should make specific reference to and require youth justice agencies to address the disproportionate numbers of and unequal outcomes experienced by BAME children. They should also include gender informed principles and require youth justice agencies to take a trauma informed approach for meeting the distinct needs of girls.<sup>2</sup> The standards should also seek to drive the early identification and intervention or diversion of children with learning or physical disabilities or mental ill-health into more appropriate settings.

December 2018

## **Race**

Given the serious and persistent nature of the overrepresentation of BAME children in the youth justice system, and BAME individuals in the criminal justice system more broadly, we are surprised that the revised standards do not specifically refer to this. In a context of growing disparities<sup>3</sup> and rising numbers of Muslim boys, meaning that 48% of children in custody are now from a BAME background,<sup>4</sup> we are particularly disappointed that there are no mechanisms or requirements in the revised standards specifically related to addressing this disparity and the unequal outcomes for BAME children once in the system.

Without specific principles and targeted measures to address racial disproportionality it will continue to persist in the youth justice system. Policies that do not have specific aims or strategies for reducing unfair outcomes for BAME children are likely to still be effected by unconscious bias and produce continuing disparities. There should be national standards at each stage of the youth justice system that promote equality of outcome for BAME children, recognising that achievement of this may require targeted measures tailored for BAME children.

David Lammy's review of outcomes for BAME people in the criminal justice system<sup>5</sup> shone a particular spotlight on the youth justice system, highlighting it as the area of most concern. Given this we recommend that Lammy's principle of 'explain or reform' be fully embraced by the YJB. The Ministry of Justice's recently published update, *Tackling race disparity in the criminal justice system*<sup>6</sup>, states that 'explain or reform' has been adopted as "an overarching principle for cultural change". The youth justice standards represent an opportunity, in the area of David Lammy's greatest concern, to take this a step further.

The YJB could be a trailblazer within the justice system, building the principle into the oversight and monitoring of these standards and providing a clear process for how the principle could be implemented. In addition, Clinks recommends that in doing so the YJB should involve the BAME-led voluntary sector and community representatives in developing strategies for reform and deciding what constitutes an acceptable explanation and timetable for reform.

## **The national standards**

### **Standard one: Out-of-court**

Clinks welcomes the requirement for Youth Offending Team (YOT) management boards to have in place local strategies and services that focus on prevention and delivering robust out-of-court disposals. We recommend that specific reference is made to the voluntary sector as a potential partner in the design and delivery of services.

Collaborating with the voluntary sector in developing local strategies and in co-designing and offering local services is vital for ensuring a robust and effective out-of-court disposal system. Voluntary sector organisations, particularly small, specialist ones, can be key strategic partners because of their expertise; including that of local areas and local need, and the needs of children with protected characteristics.

Since 2010, however, cuts to youth services and to YOT budgets have disrupted and damaged many previously successful partnerships, leaving the voluntary sector in a fragile state.<sup>7</sup> Previous collaborative approaches aimed at prevention, diversion and resettlement were highly effective and now need to be rebuilt if progress is to be sustained. Providing effective, joined-up responses to children and young people will therefore now require re-investment in partnership working with the voluntary sector and wider community, to involve them as key strategic and delivery partners. It is therefore vital that the standards encourage this.

Clinks welcomes the inclusion of "quality assurance and transparency in decision making" in the standards and in particular recording "analysis and action planning to tackle any

disproportionality." BAME organisations attending Clinks consultation events told us that they felt BAME children were often excluded from diversionary opportunities such as referral orders and restorative approaches because their ethnicity is perceived through a lens of risk, leading to a perception that they are 'unmanageable' and beyond the reach of such initiatives, resulting in their rapid escalation through the youth justice system. Adequate analysis of and action planning to tackle disproportionate outcomes such as this are therefore urgently required.

Such analysis should apply to both the number of, and outcomes for, children in any particular protected group. Action planning should be further defined to make clear the need for clearly defined targets to address any disproportionality in line with our previous recommendation regarding the full adoption of David Lammy's 'explain or reform' principle.

Clinks welcomes the inclusion in the standard that YOTs must have in place mechanisms that provide them with assurance that "out of court disposals are robust and deliver targeted and tailored interventions." We recommend this is strengthened to make clear that specifically tailored interventions may be required for children with characteristics protected under the Equalities Act (2010).

The learning from wider research about women in contact with the criminal justice system and the gender-informed, holistic interventions provided by women's centres shows that girls benefit from services which are provided in a safe, nurturing, girl-only environment where there is an emphasis on positive relationships and relational safety; which addresses risks alongside strengths in the context of girls' lived experience; which promotes a positive version of girl or womanhood; and which incorporates work with families. This learning should be reflected in the interventions directed at girls in contact with the youth justice system.

The criminal justice system may also now need to consider whether BAME people require a distinct approach in order to achieve equality of outcome in the same way as a distinct approach is now generally accepted as appropriate for women and girls in the justice system. There needs to be consideration of the discrimination BAME children may have experienced prior to, and within, the justice system to take into account how their opportunities and life course has been affected by structural racism when assessing their risk, needs and the appropriate response to their offending or anti-social behaviour.

### **Standard two: At court**

We have recommended that the principles underpinning these standards could be further strengthened through the development of a theory of change approach rooted in full adoption of the UNCRC. As such the criteria laid out for the individual reports prepared by the YOT at the court stage should specifically refer to the requirement for them to be welfare-based and child-centred.

We are strongly of the view that diversion from the justice system, minimal use of youth detention, the rights of the child and the long-term outcomes of children should remain the key priority of the advice and recommendations YOTs provide to the courts. It is therefore concerning to see a proposed requirement for reports to the courts to be "informed by the victim's view of the offending behaviour" which has the potential to undermine the 'child first, offender second' principle. Greater clarity is needed on to what extent the victim's view will be taken into account and how it is intended to be reflected in or influence the report.

Alternate ways of involving victims in the process should be sought. For example, interventions such as restorative justice, which consistently produce higher victim satisfaction and better reoffending outcomes, should be promoted where possible to enable the victims to be involved in the process whilst still maintaining the core principles of the 'child first, offender second' principle which underlies the youth justice system.



## CLINKS' response to the Youth Justice Board's proposals for standards for children in the youth justice system 2019

December 2018

In our submission to the Taylor Review, Clinks called for better rights-based information and protocols for children in the youth justice system. Ensuring children and parents have the appropriate information and support is vital for them to be able to engage in and navigate the court process and we welcome the inclusion of this in the national standards. However, this point should go further and there should be clearer reference to the rights of a child in the youth justice system and advocacy support to ensure that they and their legal guardians are able to access their rights.

The national standard should also require YOT management boards to have mechanisms in place that tailor information and support or looks for alternate ways of communicating it where appropriate to ensure equality of outcome. Particular regard should be given to how this could be impacted by learning disabilities, mental health, varying levels of maturity, and language barriers. YOT management boards should also take into consideration generally lower levels of trust in the justice system and statutory bodies amongst BAME communities because of the impact of previous experiences of discrimination outside and within the criminal justice system, and the effect this can have on their engagement in the court process, particularly on how advice and support is received.

Information and support protocols should empower children to share in and challenge decisions about them. Support needs to not only be practical and legal but should also include emotional and mental health support in order to promote children's resilience and minimise the damaging impact the justice system can have on children and their families. These principles go beyond the court stage and should be applied to every stage of the criminal justice system.

### **Standard three: In the community**

We welcome the priority placed on the children's best interest and the recognition of the potential damage that the justice system can have on children and that this is reflected in the mechanisms required of the YOT management board. We reiterate the need here to build children's resilience and meet their welfare needs as a central part of working towards desistance and that this be reflected in the priorities of local practice and the national standards. If the focus of community interventions are too punitive they can be counter-productive.

For children under their supervision in the community, YOTs should also work to help build and maintain positive relationships with key people in the child's life and develop a stake in their community. This is a key supportive factor in desistance and should be considered throughout the system rather than just at custody stage as currently proposed.

The standard states that YOT management boards have mechanisms in place "for effective communication and information exchange for all relevant stakeholders." We have reiterated the importance of the voluntary sector in delivering support services to children in contact with the youth justice system and the value of the community networks they can provide. Many voluntary organisations report experiencing poor communication and data sharing from statutory agencies, including not being informed about important changes in people's circumstances that impacts the services they deliver to them. It should be made clear in the national standard that communication and effective information exchange includes the voluntary sector, and to coordinate with them when organising interventions.

Clinks is concerned that the requirement for YOTs to "consider and act on diversity issues" lacks sufficient clarity and strength to ensure that YOTs account for the diverse and often complex needs of young people under their supervision, particularly those protected under the Equalities Act (2010), and achieve equality of outcome for them. The standard needs to provide more explanation as to what it means by "consider diversity" and to what end. It should specifically reference the characteristics protected under the Equalities Act (2010) as

well as other groups with specific vulnerabilities, for example care leavers. If the intention for the standards is to be more outcome-focused, YOT management boards and YOTs need clarity of what outcomes they are trying to achieve for these groups, how that is impacted by or relates to diversity and how they should account for that in their work.

#### **Standard four: In secure settings**

Clinks is pleased to see in the national standard an emphasis on creating an environment that is "rehabilitative and safe" and one "where the culture enables children to engage in a routine that helps them develop, grown and learn." We also warmly welcome the recognition that the restriction of liberty can affect the design and delivery of services. However, we are concerned about the current capabilities of the youth secure state to rehabilitate children and young adults given the unequal outcomes experienced by BAME children and recent reports around safety,<sup>8</sup> segregation of children,<sup>9</sup> and use of pain-inducing restraint.<sup>10</sup>

There is a risk that the provision of greater freedom and flexibility to secure establishment providers to decide how to achieve outcomes for children in custody, without clarity on what quality outcomes are and how they will be measured, will result in a loss of transparency and accountability on key issues that ensure a safe and rehabilitative environment and equal outcomes for a diverse cohort of children.

Given the persistent issues in secure settings for children, as listed above, that the youth custody service has not been able to effectively address, YJB needs to be clearer about the standards and expectations for safe custody for children and the conditions needed to promote the culture of engagement, rehabilitation and development that it aspires to. The standards should provide greater guidance and prescription on the minimum expected standards of custody, including use of pain-inducing restraint, segregation, time out of cell and purposeful activity.

The standards as currently proposed do not sufficiently prioritise the health and welfare needs of children in custody and as such undermine the 'child first, offender second' principle. In order to address this, the standards should include requirements for mechanisms to be in place that ensure and safeguard children's health and wellbeing, including their mental health. This includes support to address any history of trauma and adverse experiences to build their resilience and address the underlying causes of their offending.

Notwithstanding our previous remarks on the proposed standard under community settings to "consider and act on diversity", Clinks is very surprised that this is not also included in the standard for secure settings. There is a complete absence of responsibilities on YOTs, YOT management boards and secure setting providers to address the unequal outcomes that BAME children in custody continue to experience.

There are concerns amongst BAME voluntary sector organisations about the assumptions and labels that typify BAME young people as being at higher risk of reoffending, more violent and more likely to be gang-affiliated than their white peers, and the impact this has on their experience and treatment in custodial settings. The increase in Muslim boys entering custody is particularly concerning in the context of increased suspicion of and discrimination against Muslims. Whether conscious or unconscious, stereotyping of BAME children can affect how their actions and behaviours are perceived and responded to, impacting the interventions provided, risk assessments, progression and access to opportunities, and the way punishments are given. This can create barriers to positive relationships with staff and the engagement of BAME individuals in their sentence and how their 'motivation' is perceived. The standards must ensure that they drive behaviour that will address such stereotyping and lead to improved equality of outcomes for all.

Similarly, there is nothing included in the standards regarding the distinct needs of girls in

secure settings. The standards should include requirements for secure settings for girls to ensure an appropriate and trauma-informed approach which is sensitive to the high levels of physical and sexual abuse and exploitation experienced by girls in the justice system and the impact this has on their mental health and wellbeing. This must be taken into account with procedures such as searching, segregation and restraint. Settings must be suitably therapeutic and access to appropriate psychological support is essential. Mechanisms for education and training must also be sufficiently flexible to meet the specific needs of girls.

The standards for secure settings include as part of an effective sentence "maintaining community links and contact with the key people in the child's life to develop a pro-social identity with a constructive focus on future desistance." The responsibility of developing a pro-social identity seems to fall to people in the community, rather than empowering children, and it does not set out the expectations of the institution to support their development and empowerment. This part of the standard conflates a number of issues into one point, including maintaining links with the outside world, which should include significant personal relationships with people in the community whether this be family members or others; early support for transition to the community; and the need for outside agencies in particular community-based voluntary sector organisations to be brought into secure establishments. These points need to be separated out if they are to be translated effectively into practice and ensure each of these are met effectively.

Clinks would like to see reference made to the importance of the wide range of voluntary sector services provided to children in custody. These services provide vital support for rehabilitation, promoting children's strengths and skills, building their resilience, supporting their mental health and wellbeing and preparing them for transitions and resettlement.

Evaluation of Clinks' Good Prison<sup>11</sup> project in which Clinks supported a bespoke model of voluntary sector coordination in three prisons, showed that a strong voluntary sector presence in prisons creates a more normalised, community-facing culture that more effectively supports rehabilitation. It does this by bringing outside organisations in, involving people in prison in delivery and breaking down stereotypes, ultimately contributing to a safer prison environment. YJB should use the learning from the Good Prison project to enable co-ordinated delivery of voluntary sector services within secure settings that are timely, appropriately sequenced and address the needs of children in custody relevant to their circumstances and stage of sentence.

The standards should ensure that children in secure settings are able to access these voluntary sector services. This could be set out in a similar way to HM Inspectorate of Prisons' expectations for adult male prisons, which include a clear focus on the role of the voluntary sector in helping to ensure prisoners' needs are met by a coordinated rehabilitation service.<sup>12</sup>

In our response to the Taylor Review, listening to children and young people was raised as a key issue. The national standard includes reference to providing children with appropriate information during the secure phase of their sentence. We reiterate the need for better rights-based information and protocols that empower children and recommend including the need to have access to rights and access to advocacy support for all in the standard instead of only "appropriate information." Children should be given the tools to empower them to be involved in decisions made about them and challenge them where necessary. Mechanisms to allow this should be built into the national standards.

### **Standard five: Transition and resettlement**

We warmly welcome the inclusion of a national standard for the youth justice system on transitions and resettlement, and recognition of the wide variety of transitions that a child or young adult might go through whilst in the

justice system, including the transition from child to adult services.

However, as it stands the standard is ambiguous and vague providing limited strategic guidance on how to manage and support the transitions it makes reference to. The standard simply lists various types of transition that a child or young adult could go through. Raising awareness of these transitions is positive but falls somewhat short of the stated intentions of the standards.

Stability and consistency is key to ensuring positive outcomes for children in the youth justice system whatever transition they might be going through. The standard should reflect this and aim to drive consistency in key workers and early preparation for release.

The standard should also, again, make reference to the vital support provided by the voluntary sector in resettlement and various stages of transitioning, which in many cases is better able to provide consistency than statutory services. Smaller voluntary sector organisations in particular have a great deal of local expertise and community connections to provide a route for young people to re-connect with, and develop a stake in, their local communities on release from detention into the community. We also recommend the effective resettlement principles set out by Nacro's Beyond Youth Custody project which provides detailed guidance on five key areas for effective transition.<sup>13</sup>

There are also a number of transitions that the standard fails to mention. Children in contact with the youth justice system may transition from and to different stages within it, for example from the community to secure settings or vice versa. Children in the system are highly vulnerable and will often have gone through a number of changes in their lives even prior to entering the justice system, and more so inside the system. At such a key developmental stage, the instability can have profound and long-lasting effects. This is why building a child's resilience and promoting their individual strengths should be embedded into every stage of the justice system to promote their coping abilities. The standard should therefore require specific processes or strategies to manage these transitions between different parts of the system in order to provide as much consistency as possible, including where possible access to information and support that prepares them prior to the transition, access to ongoing mental and emotional support, and a consistent point of contact.

Although the standard makes reference to transition from youth to adult services it doesn't make explicit reference to maturity and the transition from child to adulthood which may be experienced in custody, on release or in the community. Wherever it is experienced, transitional support for young adults appropriate to their emotional and behavioural maturity is incredibly important when transitioning from child to adult social care and health services or the adult justice system. Maturation to adulthood is now understood as a neurological process that continues well into the mid-twenties, and many young people leaving the youth justice system or transitioning environments continue to present with profound needs for support. In addition, for care experienced children, the transition to adulthood can present additional significant challenges. The Transition to Adulthood Alliance, of which Clinks is a founding member, advocates for a distinct approach for this age group. The standard should explicitly include the need for such an approach and make reference to various guidance available from the Transition to Adulthood Alliance.<sup>14</sup>



**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.**

Published by Clinks  
© 2018  
All rights reserved

Clinks is a registered charity no. 1074546 and a company limited by guarantee, registered in England and Wales no. 3562176.

Tavis House  
1-6 Tavistock Square  
London WC1H 9NA  
020 7383 0966  
info@clinks.org  
@Clinks\_Tweets  
[www.clinks.org](http://www.clinks.org)

## Clinks' response to the Youth Justice Board's proposals for standards for children in the youth justice system 2019

December 2018

### End notes

1. Clinks (2016) *Clinks' submission to the review of the youth justice system*. Available at: <https://www.clinks.org/publication/review-youth-justice-system> (last accessed: 14 December 2018)
2. The high levels of physical and sexual abuse and exploitation experienced by girls are known to have serious consequences both for their physical and mental health.
3. Whilst there has been an encouraging decline in the overall number of children entering youth custody, this drop has not been felt equally by all ethnic groups, resulting in even greater disproportionately.
4. Prison Reform Trust (2018) *Prison: the facts, Bromley Briefings summer 2018*. Available at: <http://www.prisonreformtrust.org.uk/publications/factfile> (last accessed: 23 November 2018)
5. Lammy, D (2017) *An independent review into the treatment of, and outcomes for, black, Asian and minority ethnic individuals in the criminal justice system*. Available at: <https://www.gov.uk/government/publications/lammy-review-final-report> (last accessed: 23 November 2018)
6. Ministry of Justice (2018) *Tackling racial disparity in the criminal justice system: 2018 update*. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/747335/tackling-racial-disparity-criminal-justice-system-2018-update-web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/747335/tackling-racial-disparity-criminal-justice-system-2018-update-web.pdf) (last accessed: 23 November 2018)
7. Clinks (2016) *Clinks' submission to the review of the youth justice system*. Available at: <https://www.clinks.org/publication/review-youth-justice-system> (last accessed: 14 December 2018)
8. For example: HM Inspectorate of Prisons (2016) *Children in custody 2015–16*. Available at: [https://www.justiceinspectorates.gov.uk/hmiprison/wp-content/uploads/sites/4/2016/11/Children-in-Custody-2015-16\\_WEB.pdf](https://www.justiceinspectorates.gov.uk/hmiprison/wp-content/uploads/sites/4/2016/11/Children-in-Custody-2015-16_WEB.pdf) (last accessed: 23 November 2018)
9. Children's Commissioner (2018) *A report on the use of segregation in youth custody in England*. Available at: <https://www.childrenscommissioner.gov.uk/wp-content/uploads/2018/10/Segregation-report-final.pdf> (last accessed: 26 November 2018)
10. For example: Youth Justice Board and Ministry of Justice (2018) *Youth Justice Statistics 2016/17*. Available at: <https://www.gov.uk/government/statistics/youth-justice-annual-statistics-2016-to-2017> (last accessed: 26 November 2018); Article 39 (2018) *Chair of Youth Justice Board to lead review of pain-inducing restraint on children*. Available at: <https://article39.org.uk/2018/10/19/chair-of-youth-justice-board-to-lead-review-of-pain-inducing-restraint-on-children/> (last accessed: 26 November 2018)
11. Clinks (2018) *The good prison*. Available at: <https://www.clinks.org/publication/good-prison> (last accessed: 14 December 2018)
12. HM Inspectorate of Prisons (2017) *Men's prison Expectations*. Available at: [www.justiceinspectorates.gov.uk/hmiprison/our-expectations/prison-expectations](http://www.justiceinspectorates.gov.uk/hmiprison/our-expectations/prison-expectations) (last accessed: 23 November 2018)
13. See Beyond Youth Custody resources. Available at: <http://www.beyondyouthcustody.net/resources/> (last accessed: 23 November 2018)
14. See Transition to Adulthood Alliance *Model for change and evidence*. Available at: <https://www.t2a.org.uk/model-for-change/> (last accessed: 23 November 2018)