

June 2021

**RR3**  
Reducing Reoffending  
Third Sector Advisory Group

# RR3 special interest group on probation reform

## Final report

### About this paper: the RR3 and probation reform

The Reducing Reoffending Third Sector Advisory Group (RR3) is a formal advisory group to the Ministry of Justice (MoJ) and Her Majesty's Prison and Probation Service (HMPPS), coordinated and chaired by Clinks. The RR3 consists of 17 voluntary sector leaders openly recruited for their expertise and experience in delivering transformative services for people in the criminal justice system.<sup>1</sup>

In March 2020, the RR3 established a special interest group on probation (RR3 probation SIG), to provide advice and support to the MoJ and HMPPS as they prepared for transition to the unified model in June 2021. The group provided advice and feedback on the following:

- The design of the Dynamic Framework (April 2020)
- Day-one contract values and volumes (June 2020)
- The mobilisation of day-one contracts (November 2020)
- Future commissioning of services (January 2021)
- The design of the through the gate model (April 2021)
- How Regional Probation Directors can work in partnership with the voluntary sector (June 2021).

In April 2021 the group also met Richard Oldfield who was commissioned by the previous Prisons and Probation Minister, Lucy Frazer MP, to undertake a review of the Dynamic Framework commissioning and the group were able to provide their views and feedback on the process to inform his view.

Additional voluntary sector probation experts were co-opted to the special interest group, with a total of 43 senior voluntary sector leaders from over 30 voluntary organisations engaged across all meetings. The group enjoyed an extremely positive and solutions-focussed relationship with the probation reform team. 23 officials from the MoJ, HMPPS and the National Probation Service (NPS) attended at least one of the six meetings.

As the reformed and reunified model comes into place across England and Wales on 26 June, this paper looks at the key findings of the RR3 probation SIG. It takes stock of the positive changes that were made during the process, the continued areas for improvement and learning, and the future opportunities for the voluntary sector, including small and specialist organisations, to take a meaningful role in the future delivery of probation services.

## Summary of key learnings

- To be accessible to small and specialist organisations, the qualification process for the Dynamic Framework should be further simplified and promoted, with clear accompanying guidance on how applications will be assessed, especially for those wishing to bid as part of a supply chain or consortia.
- If exceptional circumstances impact the voluntary sector's capacity to participate in competitive commissioning, the commissioning authority should engage with the sector to assess market readiness and mitigate any adverse effects of delaying call-offs.
- The modelling used to establish criteria for volumes of service users and associated contract values should be shared openly with potential bidders, to allow them to assess the viability of a contract and whether delivery would align with the organisation's charitable mission
- The commissioning authority should routinely share updated information with bidders, even when competition is already under way.
- The commissioning authority should work closely with organisations at an early stage to ensure that technical contract requirements do not lead to perverse competition outcomes and prevent unnecessary disqualification to ensure the best quality bids are successful.
- The MoJ and HMPPS should engage with the voluntary sector, Cabinet Office and other government departments running competitive tenders to understand how it can reduce the complexity of its commissioning processes.
- When the commissioning of services is staggered over a period of time, clear procurement timetables or pipelines should be published at the earliest opportunity.
- At the start of any criminal justice procurement process, special consideration should be given to how services will be tailored to racially minoritised people, recognising the range of needs within this group as a result of diverse ethnicities and cultural backgrounds and intersecting identities. Clear processes and assigned budgets should be established to ensure the involvement of organisations led by and focussed on racially minoritised people from day-one.
- Regional Probation Directors should commission services for racially minoritised people as a priority and ensure that organisations led by and focused on racially minoritised people are enabled to engage with the design and delivery of those services.
- Commissioning guidance issued to Regional Probation Directors should be amended to clearly set out how grants can be made and the benefit of grant funding for voluntary organisations.
- Regional Probation Directors should establish meaningful voluntary sector forums far beyond their supply chains to better understand local challenges, promote multi-agency working and information sharing, and learn how empowering and enabling voluntary sector services can help them reach their ambitions.

## Part one

# The design and launch of the Dynamic Framework

Voluntary organisations of all sizes have a long history of delivering cost-effective, innovative and transformative services to people under probation supervision that change people's lives and reduce reoffending. Indeed the modern probation service itself began as a voluntary endeavour. The Transforming Rehabilitation reforms of 2015 however damaged the involvement of the voluntary sector in probation delivery and left many voluntary organisations under represented, under pressure and under resourced.<sup>2</sup>

In response to these challenges and others<sup>3</sup> the government announced in July 2018 that the Transforming Rehabilitation model would be brought to an end and Community Rehabilitation Companies' contracts cut short. The MoJ published its target operating model for the reformed service in March 2020,<sup>4</sup> which set out how services were to be reunified under 11 NPS areas, each led by a Regional Probation Director.

The Dynamic Framework is the mechanism through which HMPPS procured contracts for day-one rehabilitation and resettlement services of the new model and it will continue to play a central role in the commissioning of further services for at least seven years. It remains the main avenue for which voluntary organisations of all sizes can be commissioned to deliver probation services. The RR3 probation SIG first met in April 2020 to discuss the design of the Dynamic Framework, plans for qualification and contract call-off and market readiness amongst the voluntary sector for this.<sup>5</sup>

## Qualification process and framework design

Members of the RR3 probation SIG urged HMPPS to ensure that the qualification process for the Dynamic Framework was as simple as possible, to ensure that organisations of all sizes were able to register their interest in future contract awards.

The RR3 probation SIG recommended that HMPPS learned from the design of the education Dynamic Purchasing System (DPS) qualification process. The design of that process itself was simple but organisations had little guidance on how their applications would be assessed, making it difficult to know what information to include and in how much detail. HMPPS should ensure there is clear accompanying guidance on the qualification process, including what information is expected from organisations looking to bid as part of a consortia and how submissions will be assessed.

HMPPS assured the group that qualification would be simple and would require organisations only to respond to some basic questions about the organisation and the services it hoped to run, supported by two case studies of their work. The outcomes however suggested this was not realised. Members of the SIG and organisations in the wider sector have fed back to Clinks that they found the qualification process complex, burdensome and intimidating. While 400 voluntary organisations expressed an interest in qualification to the Dynamic Framework, as of March 2021, only 204 had qualified.<sup>6</sup> This represents a very small proportion of the estimated 1,700 voluntary organisations working in criminal justice.

**To be accessible to small and specialist organisations, the qualification process for the Dynamic Framework should be further simplified and promoted, with clear accompanying guidance on how applications will be assessed, especially for those wishing to bid as part of a supply chain or consortia.**

## The impact of Covid-19

Covid-19 struck just as HMPPS was gearing up to launch the Dynamic Framework. The pandemic had major implications on capacity, with some central HMPPS staff being pulled into crisis-management roles or being redeployed on the front line.

In part as a consequence of these pressures, HMPPS cancelled the procurement of Probation Delivery Partners in each region and instead decided to bring the delivery of Unpaid Work and Accredited Programmes back in-house.<sup>7</sup> HMPPS also decided that fewer services would be commissioned for day-one, with Finance, Benefits and Debt, and Dependency and Recovery service categories delayed for commissioning after reunification, and that the Education, Training and Employment and Accommodation contracts would cover whole probation regions, rather than Police and Crime Commissioner areas.

Covid-19 also had major implications for the voluntary sector's capacity to engage in new commissioning opportunities. RR3 probation SIG attendees described a range of pressures on their capacity, such as central staff being redeployed to the front line and business development teams and fundraising staff, where they existed, being furloughed. Data collected by Clinks at the time showed that 40% of organisations were either unable to, or were unsure whether they could, engage in new commissioning processes.<sup>8</sup> Other RR3 probation SIG attendees were concerned about the impact of the crisis on their ability to build effective partnership or consortia bids, given these resource constraints.

Despite this pressure in the sector, the government was committed to meeting its deadline of launching the new probation model from June 2021. This was understandable, particularly as the sustainability of Community Rehabilitation Companies was so uncertain. This meant however there was little scope to delay competitions for day one services, without creating challenges further down the line by reducing time for call-offs and contract mobilisation.

While recognising the challenges faced by HMPPS, the RR3 probation SIG recommended that officials explore pushing back call-offs and find ways of enabling faster mobilisation of services, such as fast-tracked vetting and clear and efficient processes for case transfers. The RR3 probation SIG also requested that the voluntary sector had a meaningful say in any decision taken on market readiness for call-off.

**If exceptional circumstances impact the voluntary sector's capacity to participate in competitive commissioning, the commissioning authority should engage with the sector to assess market readiness and mitigate any adverse effects of delaying call-offs.**

## Part two

# Competing for services

From August 2020, organisations who qualified onto the Dynamic Framework were able to bid for a series of contract lots. Education Training and Employment and Accommodation contracts were commissioned in 11 lots covering each probation area and Women's services and Personal Wellbeing services were commissioned in lots covering each Police and Crime Commissioner area. The call-offs for each contract lot was staggered over some months. During this competition period, the RR3 probation SIG convened meetings on the values and volumes of contract lots (August 2020) and the mobilisation of day-one contracts (November 2020).<sup>10</sup>

### Contract values and volumes

When first published in June 2020, the indicative values of contracts seemed very low and contracts were structured in such a way that volumes of service users and associated contract value would 'ramp-up' over the course of their delivery. The RR3 probation SIG raised concerns of the impact this may have on voluntary organisations and service users:

- In some cases, the projected number of service users to be supported under each contract was significantly below the numbers organisations currently supported. There was confusion over how these figures were reached and concern that existing service users would be ineligible under the new model.
- If, in reality, the volumes are significantly higher than expected, providers will be delivering above the agreed volume profile but with no additional funding or resource.
- After the experience of Transforming Rehabilitation, voluntary organisations would not want to commit to undervalued contracts that would need to be subsidised through other income streams or reserves.
- The reduced contract value in year one which then ramps up in following years could force organisations to make staff redundant, only to rehire them in years two or three of the contract. The potential loss of expert staff would damage the quality of services being delivered and reduce the knowledge and expertise within the voluntary sector.

Issues with the volumes manifested differently in different contract categories. For the Women's category, the volumes were generally much higher but unit costs were low. There was concern that the volumes had increased without a full understanding of the work required to provide a holistic service to women in the criminal justice system.

The RR3 probation SIG asked for more clarity on how the volumes and eligibility criteria were defined and the working out behind it, to enable the group to provide more detailed advice and feedback on the feasibility of the volumes and corresponding values and enabling the department to stress-test the assumptions.

Detailed conversations were held regarding how volumes and contract values had been defined for the women's lot and through constructive discussion some reassurance was provided about how to best understand and calculate unit costs for a service where individual women would likely be accessing a range of services to meet different needs.

In acknowledgement of the challenges that bidders were facing in modelling a service within the parameters of a ramping up in contract value over the life of the contract, HMPPS reduced

the level of ramp up to provide greater contract value in the early years. They also highlighted, in response to the concerns that this was designed to reflect, that the probation service was due to move to a new model which would take time to embed. Services commissioned under the new model would also be different to the current services, making direct comparisons of numbers of services users now and in the future and the costs associated with services for them, challenging.

Many organisations felt that the low level of contract values had a negative effect on quality of service they were able to propose in their bids. They also struggled within these limited contract values to build the kinds of partnerships with small and specialist organisations which they felt would be best allow them to meet service users' needs. For some there was concern that this compromised their organisation's values and charitable objectives.

Overall, through the reformed model, there is significantly higher investment going into rehabilitation and resettlement services, and so HMPPS was confident that the voluntary sector and service users would see a benefit in the long term.

**The modelling used to establish criteria for volumes of service users and associated contract values should be shared openly with potential bidders, to allow them to assess the viability of a contract and whether delivery would align with the organisations charitable mission.**

### Accessing accurate information

Throughout the competitions, voluntary organisations faced difficulty in accessing accurate and timely information needed to submit bids. RR3 probation SIG members particularly highlighted the challenge with accessing accurate information on requirements under Transfer of Undertakings (Protection of Employment) Regulations (TUPE).

Prospective providers were bidding using TUPE information that from their knowledge (often as incumbent providers) was inaccurate and they were therefore, at times, guessing costs related to redundancies. Where questions were raised by the voluntary sector around this, it was challenging to get adequate responses. These barriers proved insurmountable to some organisations, who were unable to get the backing of trustees to pursue bids due to such uncertainty over significant costs.

HMPPS acknowledged the issue and said the information it had access to changed over the course of the competition and changing and updating information midway through a tender can cause a distraction for bidders and advantage different organisations in the process. RR3 probation SIG members felt bidders should be provided the most up-to-date and accurate information, however late that information is. To mitigate the risk of this advantaging some over others, where prospective providers may not always be able to do anything with the data, there must be processes in place to ensure bidders aren't disadvantaged for submitting bids on older data.

**The commissioning authority should routinely share updated information with bidders, even when competition is already under way.**

### Estates and IT

The RR3 probation SIG raised challenges faced by the voluntary sector with regards to requirements around estates and IT. For example, HMPPS expected in some tenders for organisations to name the accommodation sites from which they would deliver services. In some cases this would mean naming multiple properties across a large area. For the vast majority of voluntary organisations this was impossible. Voluntary organisations are very unlikely to have this kind of resource and it would be an improper use of a charitable funds to be sitting on empty properties.

These requirements also further reduced the amount of contract value available for service delivery exacerbating the issues highlighted above.

Some organisations were ultimately unsuccessful in their bids due to these requirements, particularly for Education, Training and Employment and Accommodation contracts. Some of the organisations that were disqualified otherwise scored very highly on their bids and have been delivering probation services for many years. This was an area where the HMPPS probation reform team engaged extremely positively and did make amendments to ensure the threshold was lowered in later competitions. This led to more positive outcomes for the sector in Personal Wellbeing contracts.

**The commissioning authority should work closely with organisations at an early stage to ensure that technical contract requirements do not lead to perverse competition outcomes and prevent unnecessary disqualification to ensure the best quality bids are successful.**

### Complexity

RR3 probation SIG members also said the bidding process was too onerous and complex for the size of contracts and the process compared unfavourably to other substantial public service contracts. Very few organisations who qualified onto the Dynamic Framework had the capability and capacity to submit for tender.

The impact of onerous processes was keenly felt by smaller charities, many of whom were shut out from competitions all together. Opportunities for larger charities to lead partnerships or collaborative bids with smaller organisations in supply chains were also hindered by such complex processes and there were examples of even very large organisations needing to buy-in expertise to support their bids as they didn't have the sufficient commercial skills internally.

**The MoJ and HMPPS should engage with the voluntary sector, Cabinet Office and other government departments running competitive tenders to understand how it can reduce the complexity of its commissioning processes.**

### Contract outcomes

Lucy Frazer QC MP, the then Minister of State for Prisons and Probation said in February 2020 that the government "sought to design the Dynamic Framework in such a way as to reduce barriers to entry for voluntary sector organisations in order to encourage involvement of the sector in future delivery" .

When the outcomes for day-one contracts were announced, it seemed that this commitment had been realised. The vast majority of lead providers are voluntary sector organisations and approximately two thirds of the contract values have been awarded to voluntary sector organisations. This is a significant and positive change from the current model.

However, while voluntary sector organisations make up a significant number of those who will be delivering these services, the commissioning process has failed to draw upon the vibrancy in our sector and the range and breadth of services it provides. The voluntary sector working in criminal justice is made up of approximately 1,700 organisations who are predominantly small, local and specialist. But across 110 contracts to deliver rehabilitation and resettlement services, there are only a small number of lead providers – just 26, of which 23 are voluntary organisations.

Across the full supply chains for these contracts there are a total of 81 organisations, 73 of which are voluntary organisations. Over half of those organisations have an income of over £1m. If we compare this to the criminal justice voluntary sector as a whole, only 27% of organisations generate an income over £1m and 29% of specialist criminal justice organisations have an income of less than £100k.

It is extremely disappointing that the results of this commissioning process mean that people under probation supervision risk missing out on services delivered by small but vital organisations with strong local links at the heart of communities and with specialist knowledge of people's needs to support them to move away from crime.

The challenge into the future will be for the NPS to draw on the learning from this commissioning process and from the recommendations in this paper to build on the voluntary sector involvement in day one contracts, so that future commissioning processes are able to best draw upon the wide range of services provided across the voluntary sector including by small, specialist and local organisations.

## Part three

# Transitions and opportunities

## Commissioning future services

Though competitions for day-one services under the reformed probation model were conducted centrally by HMPPS, from June 2021, responsibility for commissioning services will lie with the Regional Probation Director appointed in each NPS region.

For 2021-22 there is a total national budget across all 12 regional probation areas of £12.5m and Regional Probation Directors are developing commissioning plans. Each regional probation area has been allocated funding for core sentence delivery services (i.e. the Finance, Benefits and Debt, and Dependency and Recovery service categories). There is no assigned budget however for other service categories, (i.e. black, Asian and minority ethnic (BAME) services, Restorative Justice and Cognitive and Behavioural Change), although there may be a regional budget allocated for local service user involvement. The Regional Outcomes and Innovations Fund (ROIF) is available as an additional source of funding for non-enforceable activity. In 2021/22 this totals £5m nationally but will likely increase to £20m in 2024-5 across England and Wales.



The RR3 probation SIG expressed concerns that the absence of a clear procurement timetable or pipeline means organisations that haven't been able to engage in the competition for day-one services still have little sense of when further opportunities will come about.

**When the commissioning of services is staggered over a period of time, clear procurement timetables or pipelines should be published at the earliest opportunity.**

## Gaps in key services

A lack of clarity over when some services will be funded generated real concern amongst members of the RR3 probation SIG of how a fully holistic probation service will be realised. For example, RR3 probation SIG members raised concerns over potential gaps of provision due to delays in the commissioning of Finance, Benefits and Debt support. As mentioned above, the rationale for delaying commissioning in the context of Covid-19 was understood, but the removal of this support in custody could lead to people being unable to address mortgage arrears or arrange payment holidays. It may also lead to people's debt issues escalating, and difficulty in applying for bank accounts, ID and Universal Credit on release. The wider financial implications of Covid-19 are also likely to increase demand for these services in the community. RR3 probation SIG members provided further information to HMPPS on the potential impact of this.

A solution suggested by SIG members to this would be where possible, novating contracts for current Finance, Benefits and Debt provision from Community Rehabilitation Companies to the NPS to ensure that vital services continue during the interim period. In areas where this is not possible, consideration should be given to the transfer of Finance, Benefits and Debt staff into NPS regions.

A related concern is the delay in commissioning services under the BAME service category. The RR3 members that hold the two seats for organisations led by and focused on racially minoritised people, along with a number of other specialist organisations, met with officials to discuss this and raised concern that the description of a 'BAME service' category indicated that one single service specification would be appropriate to meeting the needs of all racially minoritised people. In fact the needs of a Muslim woman, a young Black man, or an older Traveller will be vastly different. HMPPS committed to work with organisations led by and focused on racially minoritised people in the future development of service specifications within this category.

However there remains a lack of clarity as to when the specification will be developed and there is no assigned budget or timescale commissioning services under it. There are only three organisations led and focused on racially minoritised people in the supply chains of successful bidders for day one contracts and it is therefore vital, particularly in the context of the recent HM Inspectorate of Probation thematic report,<sup>11</sup> that this service category is prioritised by Regional Probation Directors in order to ensure the needs of racially minoritised people under probation supervision are adequately met.

In November 2020, the VCS stewardship fund was launched by HMPPS to strengthen the capacity of organisations led by and focussed on racially minoritised people to engage in probation commissioning. This funding has been distributed to Regional Probation Areas to support their engagement with organisations led by and focussed on racially minoritised people and Clinks has also received funds to provide capacity building support which we are delivering in partnership with BTEG and Eastside Primetimers.<sup>12</sup>

While the RR3 probation SIG welcomed this funding, maximising its impact may be limited as there is a risk that opportunities for organisations led by and focussed on racially minoritised people to actually deliver services under the reformed probation model may remain limited for some time, or in some areas, not emerge at all.

**At the start of any criminal justice procurement process, special consideration should be given to how services will be tailored to racially minoritised people, recognising the range of needs within this group as a result of diverse ethnicities and cultural backgrounds and intersecting identities. Clear processes and assigned budgets should be established to ensure the involvement of organisations led by and focussed on racially minoritised people from day-one.**

**Regional Probation Directors should commission services for racially minoritised people as a priority and ensure that organisations led by and focused on racially minoritised people are enabled to engage with the design and delivery of those services**

## Challenging contract culture

The RR3 probation SIG advocates for the use of grants. The group believe grant processes are simpler for smaller organisations to engage in and afford the flexibility needed to reach the most effective outcomes, rather than working to prescriptive outputs. Members of the group said grant opportunities could still be run in an open and competitive way and offer excellent value for money but will open up opportunities to a far wider range of organisations.

Guidance is being issued to Regional Probation Directors, highlighting how they can identify need in their areas and how they can address those needs through commissioning. The draft guidance provided to the RR3 probation SIG says that grants can be used, but suggests that commissioning through contracts should be the default route. It states, "when a specific service is being commissioned, a contract should be used so that there is clarity and accountability for the service which is required."

In the RR3 probation SIG feedback to HMPPS on this guidance, we recommended this be looked at again and further detail provided of what is defined as a "specific service", as we are extremely concerned that this will result in little use of grant funding, to the detriment of small and specialist voluntary organisations. The RR3 probation SIG recommended that in order to prevent contracts being used as default, the guidance should also include information about why grants are better suited to funding voluntary sector services.

**Commissioning guidance issued to Regional Probation Directors should be amended to clearly set out how grants can be made and the benefit of grant funding for voluntary organisations.**

## **The role of Regional Probation Directors**

In the final meeting of the RR3 probation SIG, all Regional Probation Directors and the Chief Probation Officer were invited to discuss opportunities for Regional Probation Directors to work in partnership with the voluntary sector in a strategic way.

The RR3 probation SIG called for partnerships to be built far beyond supply chains, and for the sector to be seen as more than a provider, and as a crucial strategic partner to feed into and achieve the ambitions of reducing reoffending plans. Organisations are interested in how Regional Probation Directors will develop structures for voluntary sector engagement and how these will link in with existing structures. It was recommended that there should be some consistency with a voluntary sector forum in each region to increase awareness and ensure the Regional Probation Director takes ownership of engaging with the sector. The RR3 probation SIG also urged Regional Probation Directors to involve service users in strategic discussions around partnerships.

As commissioners of services, the RR3 probation SIG would like to see Regional Probation Directors taking on board the feedback from the voluntary sector on their experiences of competition for day-one services, and to consider how the complexity of commissioning can be reduced and how grants can be deployed as a default funding method. The timeframes and budgets for future service categories could be shared to help the sector plan ahead, and to help identify any gaps going forward.

**Regional Probation Directors should establish meaningful voluntary sector forums far beyond their supply chains to better understand local challenges, promote multi-agency working and information sharing, and learn how empowering and enabling voluntary sector services can help them reach their ambitions.**

## **Conclusion**

For many organisations, the process for competing to deliver services through the Dynamic Framework was frustrating and challenging, and as set out above the contract outcomes for day-one services present a mixed picture.

Overall however the reunified and reformed probation model that went live on 26th June 2021 presents an opportunity to move past the failings of Transforming Rehabilitation and towards a more cohesive service that better involves the voluntary sector in the design and delivery of services.

Regional Probation Directors will be crucial in this – and we hope that the key learnings from the RR3 probation SIG can help shape their approach to the commissioning of future services and how they engage with the voluntary sector in a strategic way.

In addition to this, Clinks will continue to offer support to Regional Probation Directors on an ongoing basis, to help provide intelligence on the sector's experience of the Dynamic Framework and offer solutions and opportunities to addressing some of the challenges, and to identify positive engagement structures with the voluntary sector and share examples of good practice.

While the RR3 probation SIG has now closed, the RR3 will continue to monitor the implementation of the reformed probation model and offer its continued advice and support to the MoJ and HMPPS, to help make the probation service the best it can be.



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### End notes

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1. <https://www.clinks.org/about/team/RR3>
2. <https://www.clinks.org/publication/under-represented-under-pressure-under-resourced>
3. The model was also described as 'irredeemably flawed' by HM Inspectorate of Probation in part due to challenges in the private sector, as a number of Community Rehabilitation Companies collapsed under the weight of unsustainable contracts.
4. <https://www.clinks.org/publication/target-operating-model-probation>
5. <https://www.clinks.org/publication/summary-note-rr3-special-interest-group-probation>
6. <https://www.clinks.org/publication/notes-reducing-reoffending-third-sector-advisory-group-rr3-quarterly-meeting>
7. <https://www.parliament.uk/business/news/2020/june/statement-probation-services/>
8. <https://www.clinks.org/community/blog-posts/probation-reform-and-dynamic-framework-what-you-need-know>
9. <https://www.clinks.org/publication/notes-reducing-reoffending-third-sector-advisory-group-rr3-special-interest-group>
10. <https://www.clinks.org/publication/notes-reducing-reoffending-third-sector-advisory-group-rr3-special-interest-group-2>
11. <https://www.justiceinspectorates.gov.uk/hmiprobation/inspections/race-equality-in-probation/>
12. <https://www.clinks.org/our-work/black-asian-and-minority-ethnic-people#consultancy>



**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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