

August 2021



CLINKS
RESPONSE

Clinks response to Justice Select Committee Inquiry – women in prison

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 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 600 members, 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.

Clinks supports and represents organisations that work with women in contact with the CJS, including a network of women's centres and specialist women's services. We employ a Women's Network Co-ordinator and convene the women's networking forum in partnership with Agenda. Clinks also works extensively with the government to ensure that the voluntary sector's role, knowledge and expertise is reflected in policy decisions effecting women in the CJS. Clinks sits on the Ministry of Justice's Advisory Board for Female Offenders (ABFO), which provides oversight of the delivery of the government's *Female Offender Strategy*. Clinks also sat on the expert group for Lord Farmer's review into the importance of relationships to women in prison.

About this response

We have focused our response on the questions of most relevance to the voluntary sector working in criminal justice, particularly those providing services designed specially to meet the needs of women. The evidence we present is based on our ongoing engagement with our members as well as the information we garnered through a consultation event, attended by 20 organisations.

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Supporting the voluntary sector
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Summary of recommendations

- It is essential that any future grants programmes led by the Ministry of Justice (MoJ) are proportionate and offer funding on a longer term basis for organisations. We do however recognise that the MoJ faces the challenge of one year spending reviews in this respect.
- The MoJ should provide leadership in driving a strong cross-departmental strategy for the long-term financial sustainability of existing holistic services provided by women's centres, and to support the creation of centres in areas where there is no, or inadequate, provision.
- We recommend a full update about progress with the implementation of the Farmer Review recommendations is published by the Ministry of Justice.
- The MoJ should develop, in consultation with the Advisory Board for Female Offenders (ABFO), a clear action plan to support and monitor the implementation of the remaining commitments from the *Female Offender Strategy*. This should also reflect the funding earmarked to deliver on each commitment with updates brought to the ABFO and published to ensure full transparency.
- We suggest quarterly reporting about the *Concordat on women in or at risk of contact with the Criminal Justice System* is provided to the ABFO to ensure more effective monitoring of progress. We further recommend the delivery of the concordat remains a priority, and there be dedicated resource earmarked to support the delivery of the strategy.
- We recommend that the MoJ publishes more in-depth data and information, including the modelling it has used to inform the decision to expand the women's prison estate by 500 places.
- We reiterate our recommendation that the financial envelope for the residential women's centre (RWC) pilots is communicated and full, open consultation with voluntary organisations takes place in addition to market engagement
- We support the Farmer Review's recommendation for pre-sentence reports for women to be mandatory before a custodial sentence is passed.
- We reiterate our previous recommendation made to the committee that the MoJ should set specified targets to increase the provision of full written pre-sentence reports, especially for those at risk of short-term imprisonment, racially minoritised people, people facing multiple disadvantage and women.¹
- We urge the MoJ to conduct a full evaluation of outcomes from the pre-sentence report pilot for racially minoritised people.
- To address high rates of self-harm and mental ill health in prisons, services such as counselling, art therapy and more clinical forms of treatment should be offered to people as soon as they come into prison, rather than in response to a crisis. To facilitate this, a 'whole prison' approach should be taken towards mental health and wellbeing, responding to the individual needs of the whole prison population by ensuring that a wide range of tailored services are available to meet the needs of different groups of people in prison. It is important that the review of interventions available across the women's estate as committed to in the *Female Offender Strategy* is conducted to support this. The voluntary sector working in the criminal justice system has a strong track record of delivering holistic and trauma-informed services to support people's mental health in prison, and these services should be commissioned and sustainably funded.
- We reiterate and support the recommendations from Zahid Mubarek Trust's report that access to mental health support, including specialist mental health services and peer to peer support initiatives, should be maintained and enhanced throughout lockdown. All those involved in delivering these services should be considered essential workers. Additionally, a long-term programme of support should be developed and put in place to mitigate the effects that prolonged lockdown has had on the mental health of prisoners and their families.



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- We reiterate our recommendation that the government should utilise the findings from Clinks' report *Whole prison, whole person*² in the development of its guidance on a whole prison approach to improving the health and wellbeing of people in prison, as set out in *The National Partnership Agreement for Prison Healthcare in England work plan 2018-2021*.
- To support women resettle back into their communities, we reiterate our recommendation made to Her Majesty's Prison and Probation Service (HMPPS) that it moves towards a 'do with' relationship with voluntary organisations opposed to the 'do to' ethos which many organisations currently experience.
- We reiterate our recommendation to encourage the Justice Committee to seek clarification from MoJ and HMPPS on the new resettlement model from June 2021.

What progress has been made on commitments to reduce the number of women in custody and ensuring community sentences are a credible alternative to custody?

Clinks, alongside our members, welcomed the commitments made in the *Female Offender Strategy* when it was published in 2018 and expressed our support for the MoJ's three priorities: earlier intervention, emphasis on community-based solutions, and delivering better custody. We were particularly pleased to see a specific commitment to reduce the female prison population. At the time of publication, we raised our concern that the financial package announced alongside the strategy fell far short of what would be needed to ensure its ambitions were achieved.³

Unfortunately, our concerns have been realised and we are disappointed at the lack of sustainable, long term funding dedicated to the implementation of the strategy's commitments and the resultant slow rate of progress. As the Prison Reform Trust demonstrates, less than half of the strategy's commitments have been fully implemented three years after the strategy's publication.⁴

Whilst we welcomed the grant programme launched by the MoJ in July 2020 that funded core costs for specialist organisations working with women in contact with the CJS, organisations raised significant concerns with the programme. Core costs are really important to support organisations' long term sustainability as well as supporting essential functions to keep organisations running. The process for applying for grants was very complex and disproportionate given the short timeframe for the commissioning process and the window within which the funds needed to be spent. Bidders were also required to show how the funding would support very specific regional priorities which undermined the intended focus on, and in some cases could not be achieved through resource for, core costs. Further exacerbating these issues was that many organisations were in the process for qualifying for the Dynamic Framework to deliver rehabilitation and resettlement services as part of the probation reform programme, which placed further considerable pressure on their resources during the Covid-19 pandemic.

It is essential that any future grants programmes led by the Ministry of Justice (MoJ) are proportionate and offer funding on a longer term basis for organisations. We do however recognise that the MoJ faces the challenge of one year spending reviews in this respect.



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Women's centres, as recognised in the *Female Offender Strategy*, provide essential services and support for women in contact with the criminal justice system. Although we recognise that many women's centres have been successful in gaining contracts through the Dynamic Framework, these contracts do not and should not provide all the funding women's centres need to deliver their services. As has been outlined in the strategy, women's centres provide essential services across many different policy areas.

We therefore recommend that the MoJ provides leadership in driving a strong cross-departmental strategy for the long-term financial sustainability of existing holistic services provided by women's centres, and to support the creation of centres in areas where there is no, or inadequate, provision.

We also echo the Prison Reform Trust's concern that where commitments have been made to publish guidance or instructions there is little information on the impact this has had. We are further concerned about the lack of transparency from the MoJ on the progress made with the strategy. For example, there remains no published update about progress made in relation to the recommendations made by the Farmer Review into family ties for women.

We recommend this is rectified, with a full update published by the department.

We recommend that the MoJ develops, in consultation with the Advisory Board for Female Offenders (ABFO), a clear action plan to support and monitor the implementation of the remaining commitments from the *Female Offender Strategy*. This should also reflect the funding earmarked to deliver on each commitment with updates brought to the ABFO and published to ensure full transparency.

The concordat for female offenders was published two years after it was initially promised but we have welcomed the opportunity to comment on drafts through our role as a member of the ABFO and the steps MoJ has taken to respond to our, and the wider sector's, feedback. We continue to welcome the ambitions of the concordat and were pleased to see the MoJ has committed to publishing a 'one year on' report to update stakeholders on progress.

However, we recommend more frequent reporting about the concordat's implementation and suggest quarterly reporting is provided to the ABFO to ensure more effective monitoring of progress. We further recommend the delivery of the concordat remains a priority, and there be dedicated resource earmarked to support the delivery of the strategy.

Clinks was disappointed with the MoJ's announcement in January 2021 that it was planning to expand the women's prison estate with an additional 500 places to be built onto existing prisons. The decision directly contradicts the intentions of the government's *Female Offender Strategy*. Clinks' Director of Influence and Communications, Jess Mullen is a member of the ABFO and we were therefore surprised that this policy decision was not discussed with the board prior to being announced. Had it been, our advice would have been that the investment would be more effective at improving outcomes for women in the criminal justice system and reducing reoffending if directed towards community provision and diversionary schemes delivered by women-centred, trauma-informed services.



The MoJ and Office for National Statistics prison population projection shows that the women's prison population is due to rise to from 3,217 in September 2020 to 4,500 people in September 2026. The statistical analysis has assumed that we will see this trend largely due to the recruitment of 20,000 new police officers. This demonstrates a missed opportunity as the introduction of additional police officers should encourage the MoJ to work closely with the Home Office to ensure a focus on diversion from custody for women. The statistical analysis also notes it has not accounted for the "impact attributable to the *Female Offender Strategy*, as the impacts are not robustly quantifiable and thus not eligible for inclusion." Whilst we understand that it can be challenging to determine clear cause and effect, it is concerning that three years into the strategy work has not been undertaken to ensure the potential impact of any change it has achieved is quantifiable.⁵ This also indicates that the MoJ is assuming the failure of its own strategy.

Whilst this statistical analysis is helpful, it does not give enough detail about why the decision to increase the number of prison places for women has been taken.

We recommend that the MoJ publishes more in-depth data and information, including the modelling they have used to inform this decision.

Clinks is part of a coalition of criminal justice and race equality organisations that has expressed concern that the government's Police, Crime, Sentencing and Courts Bill will further entrench racial inequality in the criminal justice system. This will impact on racially minoritised women in the criminal justice system, risking sweeping more of them into custody and worsening the poorer outcomes they already experience compared to other women. We are particularly concerned that the government's equality impact assessments and statements do not consider the intersection of race and gender on its sentencing policies included in the Bill. It also fails to address the intersection of race and age, and of race and religion. We reiterate the need for the government to withdraw the discriminatory measures within the Bill and launch a proper public consultation.⁶

What progress has been made on the development of Residential Women's Centre pilots (RWCs) and do these offer a suitable alternative to custody?

Clinks was pleased to host and facilitate two consultation events for the MoJ about the development of RWCs in 2020 with the voluntary sector working in the criminal justice system. Both events had 100 delegates, demonstrating the interest from voluntary organisations in this programme of work. It was however challenging for organisations to give full, considered feedback on the proposals as it wasn't clear what financial envelope was available for the pilots as this meant the parameters within which organisations could give feedback wasn't clear. This information was deemed to be commercially sensitive due to the commissioning process for the Residential Women's Centres and was therefore only shared as part of the Market Engagement process.

We reiterate our recommendation that the financial envelope for RWCs is communicated and full, open consultation with voluntary organisations takes place in addition to market engagement.



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Information deemed commercially sensitive in relation to the probation reform programme has been shared with Clinks with the purpose of gathering feedback from the voluntary sector under our non-disclosure agreement with the MoJ. We have been able to garner this feedback without compromising any commercial sensitivities.

There have been serious delays with the RWC pilots and to date we only have confirmation of one of the pilot sites in South Wales, despite the strategy committing to delivering 'up to five' pilots across England and Wales. During our consultation event, organisations raised concern about who the RWCs are aimed at supporting, their purpose and the issues they are trying to address. Although the MoJ has specified that the RWCs are aimed at women who are at risk of short custodial sentences, delegates felt that residing at the RWCs for three months could replicate the disruption caused by short-term imprisonment which would be counterproductive. Organisations outlined that women in this position should be supported to remain in their community, particularly if they already have a settled home rather than providing an alternative institution for them to be held in. It is also unclear how broad 'local' is being defined or approached in the model, with organisations concerned that women could be made to reside long distances from their homes. This will also impact how far they have to travel to engage with the support hub once no longer residing at the RWCs and the continued disruption and cost to women that this could cause.

There also continues to be concern about the role of consent and choice in the model. Women must agree to reside at RWCs but with custody as the alternative, the sector questioned the impact this has on how meaningful their consent can be. The impact of consent and choice continued to affect how the sector felt about the role of the RWCs and the impact of compliance and enforcement particularly if women face continued threat of imprisonment for non-compliance.

It is also unclear how engagement between the RWC pilots and the probation reform programme will work. There was concern about commissioning services via the Dynamic Framework, the complexity of which has limited voluntary sector engagement particularly from smaller providers and Welsh-specific providers. There is also a lack of clarity over how Day One women's resettlement and rehabilitation services and services provided through RWCs will align and support each other.

What has been done to ensure that the welfare of dependent children is taken into account when sentencing decisions are made?

Pre-sentence reports are hugely important to ensure sentencers are better informed of an individual's circumstances and to improve sentencer confidence that effective community options, often provided by the voluntary sector, are available that allow people to address the underlying causes that have led them into contact with the criminal justice system. As outlined by the Farmer Review into family ties for women, pre-sentence reports are particularly important for women due to the complexity of their lives and the increased likelihood that they will be carers for dependants.

We support the Farmer Review's recommendation for pre-sentence reports for women to be mandatory before a custodial sentence is passed.



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We also welcome the commitment in the *Female Offender Strategy* to improve the quality and quantity of pre-sentence reports. This commitment is reflected in the 2021 Target Operating Model for the probation reform programme and we are pleased to see an explicit commitment for 'additional investment in court work we want to increase the use of pre-sentence reports in order to drive the confidence of sentencers in the delivery of community sentences and to support the rehabilitation of service users at the earliest opportunity.'⁷ We particularly welcome the recognition that pre-sentence reports could also play an important role in addressing the disparity in sentencing outcomes of racially minoritised people and that specific investment is being provided to fund greater targeting of fuller pre-sentence reports for racially minoritised people.

Clinks, in partnership with Birth Companions recently published a research report focusing on the needs and experiences of pregnant women and new mothers in contact with the criminal justice system in the community in England. We reiterate the report's recommendations that in line with Lord Farmer's recommendations, systems should be put in place to ensure women are supported by police, liaison and diversion services and probation teams in order to feel safe in disclosing information about their circumstances, including pregnancy or recent birth. This requires a gender and trauma-informed approach to policing and during court processes, and a commitment to information sharing and multi-agency working.⁸

The MoJ has developed in collaboration with the National Probation Service (NPS) and Her Majesty's Courts and Tribunal Service (HMCTS) a pre-sentence report pilot. This is taking place in 15 Magistrates' courts for 12 months in England and Wales from late March 2021. Clinks welcomes this programme and its specific aim to increase the use of pre-sentence reports particularly for certain cohorts of people, including women which will help sentencers take into account experiences of abuse and trauma.

We however think the aims of the pilot should have gone further and reiterate our previous recommendation made to the committee that the MoJ should set specified targets to increase the provision of full written pre-sentence reports, especially for those at risk of short-term imprisonment, racially minoritised people, people facing multiple disadvantage and women.

We are also disappointed that racially minoritised people are not included as a priority cohort for the pre-sentence report pilot. As the Lammy Review indicated, racially minoritised people, including women, are far more likely to receive a more severe sentences for certain offences than non racially minoritised people. Full written pre-sentence reports can help mitigate against racist perceptions and biases held by some sentencers that may lead to these disproportionate sentences. As part of the pilot, the MoJ plans to include training for probation staff on how to address unconscious bias, have conversations on race and trauma and how to recognise racial disparity in the criminal justice system.

While this may have some benefit, we don't think this goes far enough, and urge the MoJ to conduct a full evaluation of outcomes from the pilot for racially minoritised people.



Since the publication of the *Female Offender Strategy* in 2018, what work has been done to improve conditions for those in custody?

Does the female prison estate take a Whole System Approach and trauma informed response to women in their care?

What factors are contributing to high levels of self-harm in the women's custodial estate and what more could be done to address them?

Clinks conducted research to determine the impact the pandemic was having on the voluntary sector working in the criminal justice system and the people it supports. We ran six surveys over a six month period between March 2020 and August 2020 that had an average response rate of 118. Organisations raised significant concern that the isolation and anxiety created by the restrictions put in place to respond to the pandemic were having a severe impact on the mental health and wellbeing of people in the criminal justice system. People have been confined to their cells for up to 23 hours a day and have had limited contact with both their loved ones and services, including those provided by the voluntary sector.

Organisations highlighted the uncertainty they have experienced during the pandemic, which has been exacerbated by the unpredictability of changing lockdown rules and inconsistent policies and procedures across different sectors, agencies and areas. Safety measures and operational procedures to protect against Covid-19 have been applied differently across the prison estate, creating barriers for organisations to feel confident about restarting services safely.

As organisations have largely not been present in custody, it has been challenging for them to gauge conditions experienced by women. Organisations are particularly concerned that due to the lockdown in prisons it has been challenging to determine and accurately record a true picture of suicide and self-harm rates by women in prison. This is done through Assessment, Care in Custody Teamwork processes in prisons but as organisations have not been present in establishments due to the pandemic they have not been able to report concerns they might have. Taking into account the recent fall in the prison population, it is concerning that the most recent safety in custody statistics show that the rate of self-harm incidents per 1,000 prisoners decreased by 13% in male establishments but increased by 13% in female establishments in 2020.⁹

For its recent report, *A Record of Our Own*, the Zahid Mubarek Trust (ZMT) spoke to racially minoritised prisoners, families and prison leavers about their experiences of lockdown. The lockdown had severe consequences for many participants' mental health. Several stated that they had considered suicide or self-harming, or witnessed incidents in which others had done so. 87 participants told ZMT that inadequate time out of their cell negatively impacted on their loved ones' mental health. All respondents that had pre-existing mental health issues said that their symptoms got worse after lockdown began. Many participants thought that more could have been done to support vulnerable prisoners and address the mental health issues that were arising because of the pandemic. Some families highlighted their concern about the lack of support available to those newly arrived in custody who they felt were less likely to have their pre-existing vulnerabilities identified and catered for during isolation.¹⁰

During our consultation event to inform this response, organisations told us that in many cases support for mental health is often not provided soon enough with voluntary organisations



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reporting people waiting up to five weeks for an initial assessment, or support only being provided once women reach crisis point. Further, organisations stressed that women's concerns about their health are not always taken seriously by prison staff and highlighted the importance of having a third party organisation present to advocate on her behalf. They also outlined instances of where they had seen mental health problems experienced by women being treated as a disciplinary matter relating to self-control, rather than challenges that require treatment and care. Organisations told us that staff can perceive self-harm as a conscious means of seeking attention, and there is a lack of understanding about the distress and need that lie behind it. This response serves to further entrench and exacerbate experiences of trauma many women in contact with the criminal justice system have experienced before entering custody.

Despite some of the commitments from the *Female Offender Strategy* to ensure better custody for women in prison, we know there remain long-standing issues in the custodial estate including overcrowding and lack of continuity of care between prison and the community. This creates issues such as delays with accessing medication, and causes a lack of parity of esteem between prison health services and those in the community. Organisations stressed the need for priority to be given in the custodial estate to healing trauma and outlined the need for this work to support women to engage with and maintain contact with their external support networks. One Small Thing has conducted important work to address the trauma experienced by women in custody and has worked to facilitate and fund trauma-informed and gender-responsive programmes for the prison and community sectors. The evaluation from their Healing Trauma initiative published in 2015 showed that women reported a significant reduction symptoms of depression, anxiety, psychological distress and PTSD.¹¹

The MoJ has outlined that new prison places for women will be trauma informed and place much needed investment into the custodial estate. Whilst we agree that any improvements to the custodial estate are welcome, we reiterate our earlier point that women would benefit most by being diverted from custody. Further, creating a physical building that is trauma informed is not enough on its own to address the complex disadvantage women in prison have experienced. During our consultation, organisations were also keen to stress that whilst the decline in prison conditions caused by the pandemic need to be reversed, returning to the conditions that were present before the pandemic does not go far enough. This is particularly important given that needs, including poor mental health, have risen during the pandemic.

To address high rates of self-harm and mental ill health in prisons, services such as counselling, art therapy and more clinical forms of treatment should be offered to people as soon as they come into prison, rather than in response to a crisis. To facilitate this, a 'whole prison' approach should be taken towards mental health and wellbeing, responding to the individual needs of the whole prison population by ensuring that a wide range of tailored services are available to meet the needs of different groups of people in prison. It is important that the review of interventions available across the women's estate as committed to in the *Female Offender Strategy* is conducted to support this. The voluntary sector working in the criminal justice system has a strong track record of delivering holistic and trauma-informed services to support people's mental health in prison, and these services should be commissioned and sustainably funded.



We reiterate and support the recommendations from ZMT's report that access to mental health support, including specialist mental health services and peer to peer support initiatives, should be maintained and enhanced throughout lockdown. All those involved in delivering these services should be considered essential workers. Additionally, a long-term programme of support should be developed and put in place to mitigate the effects the prolonged lockdown has had on the mental health of prisoners and their families.¹²

We reiterate our recommendation that the government should utilise the findings from Clinks' report *Whole prison, whole person*¹³ in the development of its guidance on a whole prison approach to improving the health and wellbeing of people in prison, as set out in *The National Partnership Agreement for Prison Healthcare in England work plan 2018-2021*.

How are women supported to maintain family ties in prison? What progress has been made on improving family ties since the Farmer Review? What effect has Covid-19 had on maintaining family ties for women in custody? What support is available for mothers to maintain contact with dependent children?

Our research showed that for mothers in prison during the pandemic, the separation and lack of contact with their children has been shown to be acutely painful and a significant source of distress for many. Whilst we recognise the unavoidable impact the Covid-19 pandemic has had on delaying the implementation of the recommendations of the Farmer Review, we are pleased to see HMPPS accelerate its work to increase the use of in-cell telephony and the use of virtual visits for people in prison. Whilst these provide an important way for people to connect with their family, including dependent children particularly during periods of lockdown, delegates at our event stressed the importance of ensuring virtual visits do not become a replacement for in-person visits. We therefore welcome the commitment from the Minister Robert Buckland that this will not take place.¹⁴

Despite the welcome introduction of new technology to support people in maintaining their family ties, there is a risk that not all people are able to utilise this due to digital exclusion and experiences of poverty. The technology has a high security threshold which can mean it is challenging to use and in some cases visits can end early or unexpectedly due to technical errors. Organisations told us that video calls were often centred around the prison regime, rather than around times that work for a family routine which can have a detrimental impact on the ability for families and loved ones to use virtual visits.

During our consultation event, organisations welcomed the recent relaxing of Covid-19 restrictions and the introduction of in-person visits at some prisons. They stressed the need for these to be prioritised to support women to engage with their families. However, due to the distance many people need to travel to visit a woman in prison and the concern about how safe this is during the pandemic it is likely that we will continue to see reduced numbers of people visiting women. It is therefore important that women can still access virtual visits with their support networks during and beyond the pandemic.



Clinks sits on HMPPS' Family Strategy working group to inform the implementation of the Farmer Review recommendations.

We are disappointed that the group has not met this calendar year and reiterate our earlier recommendation that there is full transparency with the progress on the implementation of the Farmer Review and this is published.

Voluntary organisations delivering tailored support to families of people in contact with the criminal justice system are essential for ensuring people can maintain and develop family ties. We are pleased to see that the contracts for those delivering family services to prisons have been extended until September 2022. As these services are recommissioned, it is important that lessons are learnt from the current contracts and they are let on a full cost-recovery basis. This will enable organisations to deliver high quality services and will avoid them being required to plug any shortfalls in the funding as we have seen over previous years.

What support is available to ensure that women are successfully resettled into the community upon release and reduce reoffending? Are there any barriers to effective resettlement, and reduced reoffending?

Clinks' research into the impact of Covid-19 on the voluntary sector working in the criminal justice system and the people it supports found that limited resettlement support was taking place from prison and probation during periods of lockdown and throughout the pandemic. Voluntary sector organisations that support people leaving prison reported that co-ordinating support became significantly harder as they were not able to make contact with people prior to their release.

With less preparation in the run up to the transition to the community, this increased the needs of people immediately on release and left them struggling to navigate the new, and often changing, Covid-19 environment. One organisation told us that "those inside are concerned about what they will meet on release and we have not been able to meet to assist / plan for their release." Prior to Covid-19, there were a number of issues in providing access to banking and Universal Credit payments for prison leavers prior to release, which has been exacerbated by a lack of resettlement planning and support, with some concern raised that claims are taking longer to process. The reduction in the use of Release on Temporary Licence for women throughout the pandemic has also negatively impacted their ability to prepare for release.

The Reducing Reoffending Third Sector Advisory Group (RR3) is a formal voluntary sector advisory group to the MoJ and HMPPS consisting of 16 senior voluntary sector leaders. The group is chaired and coordinated by Clinks. The RR3 special interest group on Covid-19 – co-opting additional voluntary sector leaders with relevant expertise – is advising the government on how best to protect people in contact with the criminal justice system and to protect the future sustainability of the voluntary sector.

The group fed back to HMPPS about its management of Covid-19 and published this in November 2020.¹⁵ Overall, the voluntary sector working in the criminal justice system has experienced frustration at the difficulty in getting fast, accurate information from HMPPS and the MoJ in terms of policy decisions on how to manage the pandemic. Voluntary



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sector organisations of all sizes experienced slow information flow and characterised by a preoccupation around official signoff procedures rather than a focus on disseminating useful information which would allow providers to adapt and plan their response. The consequence of this lack of information was that many voluntary organisations were not able to contribute fully to supporting people in prison and on probation and in helping HMPPS staff with preventing the spread of Covid-19. This also impacted on organisations' ability to provide resettlement support and services to people leaving prison.

Organisations frequently reported that information which was supplied was incomplete, or, on occasion, inaccurate. There were also issues about conflicting information coming from central government and individual prisons or of different approaches between custodial establishments. Similarly, different Community Rehabilitation Companies adopted very different approaches in communicating with their voluntary sector supply chain partners with what appeared to be little quality control or oversight from HMPPS.

These issues were present before Covid-19 but were brought into stark focus by the pandemic. The learning from these challenges must be taken into account in the recovery from the pandemic.

To support women resettle back into their communities, we reiterate our recommendation made to HMPPS that it move towards a 'do with' relationship with voluntary organisations as opposed to the 'do to' ethos which many organisations currently experience.

The voluntary sector should be viewed as a strategic partner in the delivery of resettlement and rehabilitation services, not just a service delivery vehicle.

As we outlined to the committee previously, we are concerned about the new 'reach in' model to support resettlement as part of the probation reform programme. We have been told by voluntary organisations currently providing through the gate services that neither they nor many governors fully understand the resettlement proposals and how they will work in practice.

We reiterate our recommendation to encourage the Justice Committee to seek clarification from MoJ and HMPPS on the new resettlement model from June 2021.

What support does the female adult estate offer to girls transitioning from the youth custodial estate?

As part of their Young Women's Justice Project, Agenda and the Alliance for Youth Justice have published both a literature review and recommendations paper focusing on young women's experiences as they turn 18 and transition to the adult justice system.

We fully support the recommendations made in the report, particularly for the Ministry of Justice to integrate an age-informed response to young adult women within the *Female Offender Strategy*.¹⁶



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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End notes

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