

Clinks response to the Prison Strategy White Paper



Our response

Submitted February 2022

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. These include individuals and agencies with an interest in the CJS and the role of the voluntary sector in rehabilitation and resettlement.

The National Criminal Justice Arts Alliance (NCJAA), a national network of over 800 artists, arts organisations and criminal justice practitioners using creative approaches to reduce reoffending is embedded in Clinks. We also support a network of women's centres and specialist women's services working in the CJS and our race and justice network supports organisations led by and focused on racially minoritised people.

About this response

We have responded to the consultation questions as set out in the Prison Strategy White Paper and welcome the opportunity to inform future policy in this area. Our response focuses on the role of the voluntary sector working in criminal justice, specifically within prisons across England and Wales. This response is informed by consultation with the voluntary sector working in criminal justice as well as our experience of supporting the voluntary sector working in prisons and those delivering resettlement support. In preparing this consultation response Clinks held three specific consultation events, sessions at our England and Wales voluntary sector forums, and one-to-one discussion with several alliances and specialist organisations that support men and women in prison. In total we spoke with 113 different voluntary sector organisations working in criminal justice to inform this response.

Summary of our key points

1. **Opposition to prison expansion.** We do not believe that the strategy provides a convincing case as to why the capacity of the prison system needs to increase by 20,000 places. The Ministry of Justice can reduce the use of prison and keep the public safe by investing in diversion (by police and at court), reducing those held on remand, limiting the use of short prison sentences for non-violent crimes, and decreasing the number of people recalled to prison. Any prison building should be delivered alongside the decommissioning of other prison places.
2. **The strategy needs to be evidence-based.** The strategy does not provide enough evidence to back up its proposals, especially in relation to the needs of people in prison. As such it is difficult to assess whether this strategy will achieve its intended goals.
3. **The voluntary sector's role is absent.** Despite the high volume of voluntary organisations working in prisons across England and Wales, the strategy barely mentions their contribution. The Ministry of Justice should commit resources to improve its partnership with the voluntary sector, including national engagement mechanisms, greater partnership with independent grant-making trusts and foundations, and the recruitment of voluntary sector coordinators in every prison.
4. **An anti-racist prison.** The prison strategy should be explicitly anti-racist and clearly set out how it will tackle the racial discrimination and disproportionality in the prison system. It should explicitly set out what it will do to monitor the outcomes for minoritised or racialised groups, what steps it will take to address any disparities in outcomes or experiences, and how it will ensure its staff and services can meet the diverse needs of people in prison.
5. **Lived experience involvement.** The Ministry of Justice will benefit from the involvement of people with lived experience of prison in the development of strategy and services (both nationally and locally). The strategy must detail how it will achieve parity with the steps taken by the Probation Service through its Engaging People on Probation approach.
6. **Resettlement passports need considered design.** Better support for those leaving prison is necessary and the resettlement passport could be of benefit, but only if the design is user-led and attention is paid to avoid duplicating current processes. We believe that co-produced sentence plans, shared digitally with the prison leaver, along with the provision of some necessities will be the most effective way to support rehabilitation.
7. **Legislate to limit Friday and bank holiday releases.** We have set out what we believe legislation needs to include to ensure that the system has adequate clarity on how to prevent harmful releases on Fridays and over bank holidays.
8. **We need clarity on education reforms.** It is unclear how the new Prison Education Service will differ from the Prison Education Framework, or what evaluation of current provision has been undertaken. The strategy needs to set out the Prison Education Service in more detail, what it has learned from current provision, and how it will deliver a comprehensive curriculum that will meet the needs of all learners, and not just focus on literacy, numeracy, and vocational skills for employment.

9. **The needs of women should be addressed through the Female Offender Strategy.** Although there are aspects to welcome in the Prison Strategy White Paper, the *Female Offender Strategy* should be the driving force behind the approach to women, not this prison strategy. The Ministry of Justice should act on the National Audit Office's recommendations to set clear goals, metrics, and governance to drive that strategy forward and resource it. The proposals in this strategy should be considered by the governance boards for the female offender strategy (including the newly formed Women in the Criminal Justice System Board, and the Female Offender Minority Ethnic Working Group).
10. **Prison staff need the right training and clear responsibilities.** The increase in training offered to prison staff is welcome, but like probation staff, they cannot be expected to do everything. They need to work in partnership with experts from other statutory and voluntary sector services to ensure the people in their care get access to the right support. The strategy needs to set out clear expectations of what prison staff can do, and where they need support from experts.
11. **In the context of Governor autonomy, the metrics that judge performance are key.** The Ministry of Justice should set out a transparent process for consulting on the metrics they intend to assess Governors on, and detail how performance data will be captured.

A note on language

We were disappointed to see the Ministry of Justice revert to the harmful labelling of people in the justice system as offenders, especially when the department recently changed its terminology in relation to probation, adopting the term 'people on probation' and 'sentence management' to replace the use of 'offender'. Similarly, the Government's New Futures Network uses the terms 'serving prisoners', 'people leaving prison' and 'prison leavers'. Regardless of the crimes people commit, none of us should be defined by the worst thing we have done. The Ministry of Justice should refer to people in prison, or people serving prison sentences. This small change goes a long way to reduce stigma and support people to re-enter society as citizens.

Chapter One – A Roadmap to Building the Future Prison Estate

1. Do you agree that these are the right long-term ambitions for the prison estate?

Clinks supports the improvement of the prison estate to raise standards of care and decency, but we do not support the government's rationale or evidence base for an expansion of the prison estate.

Opposing the expansion of the prison system

The ambition to increase the size of the prison estate by building 18,000 new and 2,000 temporary places and creating "a pipeline of accommodation beyond our current build programme"¹ represents an expansionist prison strategy that neither Clinks nor the voluntary sector organisations we consulted believe is the right approach. We assert that the only prison building the government should undertake is to replace old and dilapidated prisons with new and/or refurbished prisons. Any prison building programme must be conducted alongside a clear plan to decommission prison places.

The successes in reducing the number of children in prison, and the government's aim of reducing the number of women in prison (stated in the *Female Offender Strategy* and reiterated in the Prison Strategy White Paper) should be mirrored by a clear aim to reduce the male prison population where it would likely reduce re-offending and not pose a risk of harm to the public.

Communities will be made safer if we divert people away from the criminal justice system and into support, and for most people (where the crimes are less serious or non-violent) the best place to do that is in the community where they can maintain family ties, have a reduced risk of homelessness, and access local support.

As of January 2022, the prison population stood at 79,193 (76,001 men and 3,192 women), with an operational capacity of 81,216.² Prison population projections assert that the prison population will rise steadily to 97,500 by 2026, with increases projected in the adult male and female estate, as well as in the number of children being incarcerated.³ These projections rely heavily on an assumption that the recruitment of 23,400 police officers will significantly increase the prison population. However, the government's own projections state that it is unclear the extent to which the increased number of police will drive up the prison population, and the strategy of building more prison places presumes failure in other government initiatives, such as:

- The additional £300 million investment in probation⁴ services and £220 million more invested in voluntary and private organisations to reduce reoffending⁵
- Investment in drug and alcohol support⁶ and a 10-year cross-government drug strategy that should support people into recovery and reduce acquisitive crime⁷

- The *Female Offender Strategy* which aims to reduce the number of women in prison
- Government funding for eighteen police force areas to establish Violence Reduction Units which are taking a public health approach to violence reduction
- Police-led diversion through initiatives like DIVERT in London, Thames Valley and Lancashire that support 18–25-year-olds to desist from crime⁸
- The roll out of the NHS commissioned Liaison and Diversion Service to divert people who have mental health, learning disabilities, substance misuse or other vulnerabilities away from the criminal justice system and into a more appropriate setting⁹
- Reignition of Integrated Offender Management through its 2020 Neighbourhood Crime Integrated Offender Management Strategy¹⁰ which aims to integrate police with probation and local community partners to reduce the repeat re-offending by often very vulnerable people
- The £64 million Changing Futures programme aimed at improving outcomes for adults experiencing multiple disadvantage – including combinations of homelessness, substance misuse, mental health issues, domestic abuse, and contact with the criminal justice system¹¹
- The £550m allocated to housing, substance misuse, and employment services that will support resettlement and rehabilitation in the latest Spending Review.¹²

The strategy should make explicit reference to solutions (such as those mentioned above) that aim to reduce the prison population. It should explain how it could limit the use of remand and short custodial sentences for non-violent offences, divert people who need mental health support and/or require support to address substance misuse, and utilise intensive community orders and models to respond to people who commit multiple repeat offences. It should also indicate how it could work with probation to reduce the high number of people recalled to prison after breaching their licence conditions or supervision requirements.

The need for an evidence-based approach

The strategy lacks a clear assessment of the needs and circumstances that lead people to prison. The strategy often refers to the root causes of offending as complex or varied, which they are, but it never assesses them in full or provides a clear evidence base to support its approach to rehabilitation or reducing reoffending. The strategy does not assess how these might differ between people serving relatively short, comparatively long, or life sentences or the distinct needs of people with protected characteristics, many of whom are consistently overrepresented in the prison system. The prison strategy must provide a comprehensive assessment of the prison population, including:

- An assessment of the causes of crime detailing the reasons that lead people to be imprisoned, including needs assessments, broken down by protected characteristics; especially gender, age (including young adults between 18-25 years as a specific category), disability, race, and religion.
- A clear breakdown of offence, sentence type (or those on remand), length of sentence (including recall), and the number of previous convictions; linked to protected characteristics.

- An assessment of the outcomes experienced by people in prison broken down by the categories above and highlighting any areas where outcomes are significantly better or worse than the average experience of the prison population.
- An assessment of the learning from oversight bodies, including reports from relevant inspectorates, the Prisons and Probation Ombudsman (PPO) and Independent Monitoring Boards (IMB). This should include an assessment of feedback collated from people in prison.
- The makeup and needs of the prison population will change over the next 10 years. To remain relevant the Ministry of Justice must commit to publishing the above evidence at regular intervals (at least annually) to assess the changing needs and circumstances of those in prison.

To understand people in prison the strategy must detail how it will involve people with lived experience in the development of strategy and services. Her Majesty's Prison and Probation Service (HMPPS) has already shown what is possible by developing a strategy for engaging people on probation and funding Wise Group and St Giles to deliver a shift in both culture and competence throughout probation regions and nationally within HMPPS. The Ministry of Justice needs to mirror this approach in relation to prisons. This would provide added value to the approach already taken by the Probation Service and increase the capability of the system to engage people with lived experience on how to improve it.

A modern, decent, and efficient prison estate

The ambition for a modern, decent, and efficient prison estate is welcome and necessary. A large part of the prison estate is unfit for purpose, as HM Inspectorate of Prisons has displayed through highly critical inspections, annual reviews, and a number of Urgent Notifications. The need for a long-term strategy that improves conditions in prisons and the quality of care for people in prison is abundantly clear.

In 2016 Clinks conducted research into the principles that should guide prison reform as part of our rehabilitative prison project.¹³ The final report recognised the challenge that prisons face, many of which are similar today. It set out a framework that might enable a more rehabilitative prison, including a set of principles that would support a prison to be 'good enough'. We recommend the prison strategy team review this research, especially in the development of specifications for new prison builds.

The strategic and operational role of the voluntary sector

The prison strategy disappointingly only mentions the voluntary sector three times.¹⁴ This is despite the significant role the sector plays in prisons across England and Wales. Our most recent state of the sector survey found that 68% of all responding organisations worked in prison and 74% of referrals came from prisons.¹⁵ The involvement of the voluntary sector is also assessed by HM Inspectorate of Prisons. As part of expectation 81, prisons are assessed against whether they have, "A named manager [that] is responsible for coordinating the work of voluntary and community sector organisations."¹⁶

HMPPS acknowledged the critical role voluntary organisations play in probation, and the Target Operating Model for probation is explicit that probation officers alone do not have all the skills necessary to meet the diversity of need presented by people under their supervision. The commissioning of voluntary and other organisations to provide rehabilitative services for the Probation Service is a further recognition of the value they bring. The prison strategy must do better to set out how the voluntary sector will be engaged both nationally and locally. We have recommended ways the strategy could improve.

Nationally we recommend that the Ministry of Justice commit to:

- Building strategic engagement with the voluntary sector. Clinks' Reducing Reoffending Third Sector Advisory Group (RR3)¹⁷ and the recently formed HMPPS Third Sector Strategic Partnership Board has shown the contribution the sector is able to make when valued as a strategic partner. These pre-existing structures provide a route for strategic input to Ministry of Justice policy and/or HMPPS operational matters, including the engagement of independent grant-making trusts and foundations.

Locally we recommend that the Ministry of Justice commit to:

- Roll out the voluntary sector coordination model as tested and evaluated in Clinks' Good Prison Project.¹⁸ Establish a single point of contact in each prison to coordinate voluntary sector engagement and ensure they are supported by prison senior management.
- Allocate a local budget to each prison and allow senior management the flexibility to grant fund services from local and/or specialist voluntary sector organisations to support rehabilitation.

An anti-racist prison system

The strategy fails to acknowledge or address the overrepresentation of, and poorer outcomes experienced by, racially minoritised people in prison, especially Black people, Gypsy, Roma and Traveller communities, and people of Muslim faith. High profile reviews over decades have highlighted persistent racial disparity in our prisons. In his latest annual review, the Chief Inspector of Prisons said there was "little evidence that [prison] staff understood how experiences of prejudice and discrimination affected rehabilitation for black and minority ethnic prisoners."¹⁹ The strategy must explicitly state how it aims to achieve the recommendations set out in those reviews, including David Lammy's 2017 review into the treatment of, and outcomes for Black, Asian and Minority Ethnic individuals in the criminal justice system.²⁰

We are aware of significant activity within the Ministry of Justice to implement the recommendations of the *Lammy Review*, but this has not resulted in significant changes in outcomes. Instead, the number of racially minoritised people in prison has increased by 3% since the publication of the review. There is an urgent need for the strategic prioritisation and resourcing of activity to address this issue. The Ministry of Justice's own *Overarching Equalities Statement*²¹ is clear that this prison strategy will disproportionately impact some groups covered by the Equalities Act.²² It states: "Our

initial assessment recognises that some prisoners with the protected characteristics of age (30-39 years old), disability, sex (men), race (ethnic minority groups), and religion (Muslim people) are likely to continue to be over-represented in the offender population and impacted disproportionately by the proposals by virtue of this. We also recognise that our prison staff are underrepresented in relation to disability, race (ethnic minority staff) and sex (women).” Despite this clear recognition, the Prison Strategy White Paper fails to make any detailed proposals as to how it will mitigate against this.

We welcome the establishment and work of the Race Action Programme within HMPPS but for it to be effective and have impact across the agency in the areas that matter most, addressing race disparity needs to be included in the prison strategy as a clear priority. There should be a specific focus on monitoring and improving outcomes for racially minoritised people at the local and national level, as outlined in the *Lammy Review* recommendation 30, “HMPPS should develop performance indicators for prisons that aim for equality of outcome for BAME and White prisoners.”

Chapter Two – Tackling Violence and Reducing Harm and Promoting Good Order and Discipline

2. Do you agree these are the guiding principles around which the future regime should be designed?

During our consultation events voluntary organisations repeatedly told us they were concerned that the focus of this chapter was disproportionately on the use of technology to monitor violence and harm rather than looking toward the root causes of why people might harm themselves or others. In general, we believe that the strategy must correct this imbalance by providing greater detail on both the support necessary for people to better self-regulate and specific ways in which the system could adopt improved mental health and trauma-informed practice.

Targeted Safety and Security Interventions

- **Establish an innovation taskforce to consider the best interventions for prisoners who are violent or self-harm with experts from the frontline, health, psychology, academia, and third sector organisations.**

We welcome the Ministry of Justice’s commitment to engage the voluntary sector in its innovation taskforce. Specialist voluntary organisations have a great deal to offer the prison system as experts in conflict resolution, coaching, family engagement, drug and alcohol recovery, mental health and wellbeing services, and therapeutic arts-based interventions that can reduce violence and

increase prison safety. The taskforce should clearly set out what expertise it requires and actively recruit a broad range of expertise. We recommend the Ministry of Justice work with Clinks to recruit a diverse and representative group from the voluntary sector, and that the taskforce work with user involvement charities to develop strategies for engaging people with lived experience.

The specification for pilot services should be openly consulted on and competed as a grant programme to allow organisations the flexibility to test new approaches. Sufficient funding should be made available to evaluate the impact, and the programme should be externally evaluated to make recommendations on how innovation could be taken on board and where appropriate commissioned as a mainstream approach.

As part of Clinks' Good Prison Project to improve engagement of voluntary organisations we highlighted how increased partnership could improve prison safety. Staff at HMP Exeter had access to a directory of services from the voluntary sector within all Assessment, Care in Custody and Teamwork (ACCT) documents to provide staff with immediate access to information on support services that may contribute to care plans.²³ Staff used this to quickly get people the right support. Equally the Governor at HMP Dartmoor referenced how closer relationships with the voluntary sector increased prison safety by supporting visiting voluntary organisations. They stated: "The [voluntary sector] coordinator has worked alongside our Safer Custody team to ensure voluntary sector staff have had training and support on the ACCT process, violence reduction processes and how to raise concerns about prisoners with the prison. Health and safety, safe systems of work, security and Prison Life training have also been offered in support of overall safety of the establishment." The creation of a stronger partnership with voluntary organisations is likely to lead to better intelligence on, and more support for, people's wellbeing in prison.

Providing the Right Support

As outlined earlier in this response, we do not believe the Ministry of Justice provides adequate data or analysis on the current issues facing people in prison to fully understand whether these approaches represent the greatest strategic priority or best value. Neither does the strategy commit to capturing and analysing data over the course of its implementation to assess whether those needs have changed over time, and to what extent it might need to diverge from the proposed approach if the needs in prison were to change over time.

In the short-term there are proposed initiatives that Clinks supports, namely:

- Enhanced Support Service (support from a prison officer, mental health nurse, and psychologist in prisons where violence is most prevalent)
- Additional support service in conjunction with the Samaritans for prisons in the period following a self-inflicted death
- A peer-support model to support people at risk of violence or self-harm in selected prisons over the next two years, to provide peer support as 'wellbeing navigators'
- Improve our understanding of debt through a major study.

However, we urge the Ministry of Justice to set out both how it will involve the voluntary sector in the design of services or research and where it will plan to contract or grant fund any of the approaches set out below. In addition, the department must outline how it will engage those with lived experience to co-produce these initiatives.

Building back better: post-Covid learning and regime design

In paragraph 72 the prison strategy references “rolling out an ambitious two-year programme of Future Regime Design, which will support and empower Governors to design their own regimes to meet the strategic objectives in this White Paper. It will set targets for prisons to focus more closely on the different needs and goals of the prisoners in their establishments so that the regime day is shaped so that each prisoner’s time can be spent more meaningfully.” We welcome the engagement from the department and HMPPS so far with the RR3 Covid-19 Special Interest Group and strongly urge the Ministry of Justice to consider how a wider range of stakeholders can continue to play a role in developing and designing prison regimes. It is vitally important that existing providers of services within prisons can contribute to this discussion, especially to establish how regimes could support the delivery of either one-to-one, group, or remote delivery of interventions to support rehabilitation and wellbeing. This approach must include the involvement of people with lived experience.

In paragraph 74 the strategy states that “Covid-19 has shown that prisons can improve safety outcomes by rethinking the structure of the day. One of these lessons is that in parts of the estate, mass unstructured social time can make some prisoners feel unsafe and can inhibit the ability of staff to manage risks of violence and bullying. We will disseminate this learning and in the next year, empower prison Governors to thoughtfully structure the time which is spent on the prison wing in both purposeful activity and socialising, and getting prisoners back into the activities which support their progression.” We are concerned that the experience of the pandemic might be used to justify restrictions in free association. The voluntary organisations we consulted were genuinely concerned that heavily restricted regimes and a lack of free association had significantly damaged people’s mental health, undermined their sense of autonomy, and ill-prepared them for life on release from prison. People spending almost all day locked in a cell may have been easier for prison staff to manage but will have had a significant negative impact on people in prison and hampered them from accessing services to support their rehabilitation (such as education, drug recovery services, family services, and more).

Although many voluntary organisations have gone to great lengths to make services available digitally or through workbooks, most expressed that face-to-face time and/or group work was essential to the delivery of their services and would require people to be out of cells. The ‘learning’ that the Prison Strategy says it has captured during Covid-19 lockdowns must be rigorously reviewed and published before it leads to any lasting change in the way prison regimes are organised.

The accelerated introduction of secure video calls and in-cell telephony has been welcomed by many in our sector, not least specialist family organisations who have been able to maintain family ties during difficult times. The strategy is right to point out that, “Family contact is proven to be time well spent both for immediate wellbeing and longer-term outcomes of prisoners.

These services are not a replacement of face-to-face services or in-person family contact, but provide a complementary resource to help maintain family contact.” The pandemic has shown us that long overdue technological advances can be introduced at pace. We recommend that the strategy go further and faster than its stated aim, which is to “seek to implement long-term options in line with the recommendations of Lord Farmer’s review for maintaining family ties and lessons learnt from the roll out during the pandemic.”

An evidence-based regime that promotes rehabilitative activity

Over the next two years the Ministry of Justice will ask Governors to develop an evidence-based regime which promotes rehabilitative activity focused on three key themes: a tailored approach to meet diverse needs, a regime that supports safety, and embedding technology to support a reformed regime. We have addressed our feedback on all three themes below:

a. A tailored approach to meet diverse needs

The strategy is right to note that people in prison will require tailored and individualised approaches to meet their needs. We agree that this must be a key theme in how rehabilitation is delivered. Clinks recommends that the white paper consider Clinks’ *Whole prison, whole person* report, jointly produced with the Association of Mental Health Providers for the VCSE

Health and Wellbeing Alliance.²⁴ This provides a blueprint for addressing the needs of people in prison in a holistic manner.

The strategy states that it needs to make purposeful activities accessible to everyone: “Opportunities for purposeful activity must be accessible to everyone, including those with autism and ADHD, mental health and substance misuse needs. A fully accessible regime is needed to deliver on our ambitions to better support autism and ADHD, disability and health problems and we will learn from the recent publication ‘Neurodiversity in the Criminal Justice System: A review of evidence’ to shape our regime and make it accessible for prisoners with autism and ADHD.” The focus on services that are adapted to those with neurodiverse conditions is welcome, and the evidence review does provide an evidence-based direction for the Ministry of Justice.²⁵ However, the same level of direction is not present in relation to other areas where people may need distinct approaches, for example:

- **Racially minoritised people.** The strategy must set out how it will meet and go beyond the recommendations of the Lammy Review to address race disparity.
- **Young adults.** The strategy makes little mention of a whole system approach to male young adults and must mirror its commitment in the female estate by developing a young adult strategy for men, thereby addressing the HM Inspectorate of Prisons recommendation to “develop and resource a national strategy to meet the needs of young adult prisoners.”²⁶ The Ministry of Justice should engage the Transition to Adulthood Alliance²⁷ to develop this strategy.
- **Care leavers.** The strategy is silent on the overrepresentation of care leavers, and the additional support they may require. This would appear to be an omission given the evidence presented in the Farmer Reviews,²⁸ the 2018 Ministry of Justice Care Leaver Covenant,²⁹ and their 2019 joint publication with Barnardo’s of a toolkit for supporting care leavers in custody.³⁰

- **Older people (over 60).** The strategy needs to assess whether prison infrastructure can meet the needs of older people, the age-appropriateness of activities, availability of relevant healthcare provision, adapted community resettlement services, and end of life care in prisons. As part of the health and wellbeing alliance Clinks partnered with RECOOP, a specialist charity supporting older prisoners, to create a guide for better supporting older people in prison.³¹

b. A regime that supports safety

The strategy states that Governors can support safety, “By redefining how prisoners spend their time and introducing more purpose and structure to the day, Governors will enable staff to keep order and spot safety concerns, whilst also creating the right conditions for prisoners to maintain good mental health.” A key part of introducing purpose and structure into people’s days in prison should include a wide variety of services, both those that directly support people with their needs and those that provide hope and build on people’s strengths and skills. One way in which this could be supported would be for the strategy to set out how it will include arts, culture and sports.

There is a large and growing body of evidence into the impact of arts and sports on people’s wellbeing, and people in prison should be able to access that. Disappointingly the prison strategy makes no reference to the role that they play in prison regimes. A more creative and physically active environment will support mental health and dynamic security, and can improve prisoner-staff relations. The National Criminal Justice Arts Alliance embedded within Clinks has produced guidance on how arts and culture can be involved in the prison system, and it has access to a wide range of arts organisations that could advise prison governors on the development of local regimes.

c. Embedding technology to support a reformed regime

We agree that upgraded technology must be a part of new regimes. Online systems need to replace paper files, allowing secure access to improve inter-agency data sharing. A critical part of developing a prison regime that hosts external agencies is to ensure that all activity is recorded and that the collective intelligence can contribute to the effective and efficient targeting of resources. It is vitally important that voluntary organisations contribute to these case management systems, adding information about the activities people are undertaking and flagging any issues or risks. New systems must be tested with voluntary organisations to make sure that it is possible to achieve high quality inter-agency collaboration.

Behaviour Management (adjudications)

To address “poor, and sometimes criminal, behaviour in prisons” the *Prison Strategy White Paper* suggests that adjudications³² work best when they are swift, transparent, and fair. It is further stated that the government will “explore bringing forward secondary legislation to support swift sanctions which better support positive behavioural change through the introduction of ‘fast track adjudications.’” Research tells us that the prison system does not treat all prisoners equally, and we cannot support the proposal for fast-track adjudications without specific action to address the disproportionate use of adjudications against racially minoritised people. Both the Young Review and The Lammy Review found clear discrimination in relation to adjudications: “Analysis commissioned for this review indicates that based on 2014/15 data, adjudications were

disproportionately brought (charges made) against adult male BAME prisoners from a Black or a Mixed ethnic background. Adjudications are brought by individual officers. But the analysis showed that when the case was reviewed by a panel, adjudications against all adult male BAME prisoners were less likely to be upheld. The lesson is that oversight provides an important corrective.”³³

Research conducted by the Zahid Mubarek Trust in partnership with the Prison Reform Trust³⁴ recorded discrimination in the treatment of Black and Muslim prisoners, stating, “Black prisoners are over-represented in segregation units, more likely to have force used against them, and more likely to be on the basic regime. Muslim prisoners are more likely to say they have been victimised by staff. And both groups are less likely than their white counterparts to believe that officers treat them with respect.” That same report shone a light on how the complaints process almost never upheld a complaint of discrimination made by people in prison: “Prisoners’ allegations of discrimination by staff were upheld in four of 283 cases (1%). When a series of reports indicated a pattern of discrimination from an officer, not one was upheld.”

A faster adjudication system must record and publish any disproportionate use of adjudications against minoritised or racialised groups. If racial disparity is recorded, then it must be addressed immediately. Without this level of oversight, we believe a swifter adjudications system would directly discriminate against Black and/or Muslim people in prison, and potentially other racially minoritised prisoners. Data on disproportionality in prisoners’ outcomes can be tracked using the Equalities Monitoring Tool (EMT), that includes reporting by ethnicity against IEP, complaints, and adjudications. This data tool needs to be central in the strategy to assess and record whether the changes discriminate against particular groups of people in prison.

3. How should we develop outcomes frameworks to ensure our Future Regime Design ambition is realised?

We recommend that any new outcomes framework is consulted upon, allowing early engagement of voluntary sector organisations to assess the outcomes and metrics being proposed. We further recommend that voluntary organisations and/or researchers with expertise in involving people with lived experience are engaged to develop the framework.

The outcomes framework must:

- Include clear metrics on the outcomes for people in prison, broken down by protected characteristics.
- Sit alongside HM Inspectorate of Prisons inspection framework to ensure there is not any unnecessary contradiction between the data capture necessary for oversight and the data required to measure operations by HMPPS methods for oversight.
- Be commonly used across the prison estate to offer comparisons between establishments, which will require robust data collection to ensure comparisons are possible. Data on outcomes across the estate and broken down by prisons should be made available to the public.

4. Do you agree with our long-term priorities for making prisons safer?

We have commented on the long-term priorities below:

- **Operate a zero-tolerance approach to drugs in our prisons, and crack down on the smuggling of drugs, weapons or other illicit items.**

We agree that neither illegal drugs, weapons, nor other illicit items should find their way into prisons. Voluntary sector organisations were equally clear that the aim of reducing supply must be met with an equal or greater attempt to support people into recovery. This will include abstinence-based approaches, but must be flexible as to the approach based on the needs of the people in prison. Increased funding for recovery services must be detailed alongside increased security measures.

- **Use our improved understanding of issues that drive violence and self-harm in prisons.**

The strategy should commit to improving the understanding of what drives violence and self-harm through research, including pilots that develop and test new approaches, and research into the experience of people in prison. This would serve to develop an evidence base over the next 10 years which could lead to tangible improvements. The required pilots and research require long-term funding which the strategy should set out.

- **Drive a cultural shift amongst staff to improve understanding of the root causes of violence and self-harm.**

We welcome the introduction of trauma-informed training and training to improve the relationship between staff and people in prison. However, the culture change necessary within the prison system will require far more effort to establish and needs to be included in the strategy. To change the culture of the prison system will require the Ministry of Justice and HMPPS to clearly set out the culture it wants to establish in prisons. Voluntary sector organisations are clear that prison culture must include the creation of a safe, decent, and humane environment, recognise people's strengths, and foster hope for their futures.

- **Capture a thorough understanding of each prisoner.**

Fuller assessments of people within prison will be vital to the better understanding of, and engagement with, people in prison. However, assessments can themselves be traumatising and open and honest engagement can be difficult to achieve. People in prison may be hesitant or unwilling to disclose personal matters to prison officers, and when people do disclose traumatic experiences or medical issues the prison must be able to support that person appropriately and swiftly. Prison officers cannot do this alone. The strategy must recognise that there is a clear role here for external agencies, from all sectors, to add value by working with people and collectively gaining a better understanding of people in prison as well as offering a diverse range of support services. This requires case management systems that all those partner agencies can access, and better inter-agency working between providers and sectors. The strategy should also explicitly reference the need for prison staff to be more culturally competent and tackle head on any conscious or unconscious bias, directly addressing racism and discrimination of any kind.

- **Improve the use of data for when assessing safety risks.**

We urge the prison strategy to set out how it will work with external providers to assess how data can be easily and safely accessible by voluntary organisations who work with people in prison. These systems must be designed with the end user in mind, allowing them to be developed with prison officers, outside agencies, and ultimately alongside people with lived experience of prison to ensure that it captures information in a way that is simple and effective.

- **Our future ambition for regime reform is that every prison understands the needs of each of their prisoners and is empowered to design regimes which work for everyone.**

We welcome this approach, but for it to become a reality the data we hold on prisoners will need to be radically improved, and the range of services available in prisons will need to be increased with resources allocated to commission them.

Chapter Three – The Role of Prisons and Probation in Cutting Crime and Protecting the Public

- 6. Where can we go further to give prisoners the skills to secure stable employment on release? Specifically, we would like to hear from charities, employers and training providers working with prison leavers or who would like to support our mission of getting more prisoners into jobs. We would also be interested to hear about how schemes that delay the disclosure of convictions during job applications, such as 'Ban the Box', could be enhanced and embedded with employers.**

We know that someone getting a job will support a reduction in reoffending. We need to do more to get people the right skills to get a job, and the right support to stick with it. In addition, we need to continue to tackle the stigma that prisoners face when entering the labour market, with many employers unnecessarily excluding people with previous convictions. Only 8% of people are in PAYE employment six weeks after leaving prison, and one year after release the figure only rises to 17%.³⁵

We welcome the endorsement of Ban the Box by government and recommend that the Ministry of Justice continue to invest resources in the New Futures Network, Business in the Community, and charities like Unlock to further pursue the engagement of more employers to adopt the Ban the Box³⁶ approach and for services to be clear on when and where people need to disclose previous convictions.

A key part of sustaining someone in employment is ensuring they have the right support network. Mentoring support and peer support can be a vital asset to those who are entering the labour market for the very first time. This type of flexible and person-centred approach is exactly the style of support that voluntary organisations across England and Wales have developed to support people leaving prison. The strategy should consider how it can work alongside probation-commissioned rehabilitative services to access the right volume of support for prison leavers.

In response to the Ministry of Justice's 2018 Education and Employment strategy³⁷ Clinks convened a group of voluntary organisations with expertise in employment to discuss how it might best be implemented.³⁸ There has been progress made, but to improve outcomes, the strategy will need to set out a clear investment in services that can get people into jobs and provide clarity on how it will support people with multiple needs and those with protected characteristics.

It is important for the strategy to recognise that people experiencing multiple needs will often struggle to enter and sustain employment. The strategy needs to think about distance travelled, and how some people might be moved closer to employability, even if they do not get a job immediately on release from prison. The 2016 research conducted by MEAM³⁹ made recommendations into how people with multiple needs could be supported into employment, including:

- **Coping with fear and anxiety.** All staff from employment support services, such as Work Coaches, are provided with the relevant training and resources to begin having open and constructive conversations with people experiencing multiple needs about their wider fears and anxieties, as well as their personal circumstances. This should include any additional difficulties that people face due to wider inequalities around gender, ethnicity, or other protected characteristics.
- **Voluntary versus mandatory participation.** Services felt that adopting a voluntary approach led to better outcomes. People become disillusioned with back-to-work support if they believe a service is only aiming to meet outcomes and targets it has defined, rather than their own goals. By contrast, successful services 'hide the wiring': instead of drawing attention to the targets that are set, they focus exclusively on promoting their values, which in turn allows them to achieve their outcomes. It is often easier for smaller, community-based organisations to work in this way.
- **The benefits of co-production.** A lack of choice and control over the support people receive can be extremely frustrating and lead them to disengage from looking for work, even under the threat of sanction. By contrast, developing a reciprocal relationship between services and individuals can improve people's motivation to achieve positive results. All organisations involved in the design and delivery of back-to-work support should co-produce their services with people with experience of multiple needs.

As outlined in more detail in our response to question 17 on prison staff, we believe a crucial way in which the prison service can showcase the benefits of employing people with criminal convictions is for the prison service itself to set a target to recruit people with lived experience of prison. The Probation Target Operating Model has set itself a goal to employ people with lived experience in the delivery of services. HM Prison Service, as well as private prisons, should do the same.

7. What are the main issues and barriers that prison leavers face when they are making a claim for Universal Credit? What impact do they have on prison leavers?

We welcome the prison strategy's push towards making sure people have the basics before they are released from prison, including a bank account and the ability to make a claim for Universal Credit. However, there are systematic challenges that the Prison Strategy should address.

Since 2014, a national bank account opening programme has been in place for people near to release from prisons in England and Wales. This involves the major high-street banks: Barclays, The Co-operative Bank, Halifax, HSBC, Santander, and RBS (including NatWest). HMPPS data shows around 6,500 accounts were opened in 2016/17 – the highest number in a single year to date. However, anecdotal evidence suggests arrangements have lapsed in several prisons due to change of staff or focus.

In 2019 the Reducing Reoffending Third Sector Advisory Group produced a briefing that listed the barriers and solutions to accessing bank accounts and Universal Credit claims prior to release from prison, and how these could be overcome.⁴⁰ Some aspects of this work have been usefully progressed by the Ministry of Justice's New Futures Network, but we recommend that the solutions are reviewed by the Ministry of Justice.

8. Should we take a legislative approach, as described above, for those at risk of reoffending who would otherwise be released on a Friday? If so, how should we structure this approach?

Organisations we consulted were fully supportive of restricting the release of people on Fridays or the day before a bank holiday, citing the impossible situation it puts people in. Nacro has been highlighting the difficulties associated with releasing people from prison on a Friday (or the day before a bank holiday) since 2018.⁴¹

A legislative approach is needed. Legislation can provide a clear, robust, and straightforward process for prison governors to follow, a defined power to act, that creates consistency and supports the system to work effectively. *The Prisoners (Control of Release) (Scotland) Act 2015* provides a template for legislation in England and Wales. It states that people due for release on a Friday can have their release brought forward by one or two days if it would be helpful for that person's reintegration into the community. The Ministry of Justice should also take into consideration the Scottish Government's consultation on taking this further, which is set out as follows: "Altering current flexible release arrangements so that release no longer happens on a Friday or in advance of a public holiday in order that people leaving prison can access support at the point of release"⁴²

Nacro submitted a cross-party amendment to the Police, Crime, Sentencing and Courts Bill moved on Wednesday 15 December by Lord Hodgson of Astley Abbots which would have allowed prison governors the discretion to release people up to two days earlier than their original release date 'where it would be helpful for the prisoner's reintegration into society'. We agree with Nacro that this approach, supported by a straightforward process, guidance, and training would make a significant difference to the problems of Friday releases in a clear-cut and low-cost way.

This process should be built into the resettlement planning. For example, probation officers should record whether the person is due to be released on a Friday and, if so, they should make an assessment as to whether that would be detrimental to their effective resettlement. If this were the case, that information would be submitted to the Governor for a decision. There would need to be clear guidance on what information is needed and the thresholds to be met.

We believe this approach would support resettlement, allow people to access the services they need, and reduce the likelihood of reoffending in those crucial first few days post-release.

9. Do you agree with the 'guiding principles' and priority outcomes and areas of focus we have identified for developing the Resettlement Passports?

Getting the basics for release is the right thing to do, but we are concerned that the resettlement passport needs to be more clearly defined before we can assess whether it would be effective. Organisations we consulted were confused as to how a resettlement passport would differ from a sentence plan (which lays out and aims to support someone's effective resettlement) and thought it might simply represent a duplication of effort within the system.

Any resettlement passport must focus on the benefit it provides to the prison leaver. For that reason, it would benefit from greater user design and testing with prison leavers. This approach could assess what people really want to see as part of a resettlement passport. We recommend the Ministry of Justice builds on the response submitted by Revolving Doors Agency who discussed the resettlement passport proposal with people who have experience of prison resettlement.

From consultation events, voluntary organisations considered the following to be important:

- **The sentence plan and any related resettlement passport should be available digitally to the prison leaver.** The data contained within it will require adequate protection, because of the personal and sensitive nature of the information. Further work is needed to overcome the challenges of digital exclusion and support specific cohorts of prisoners to access such a system (either because of digital capability or access to devices). This plan needs to be co-created, in line with the *Probation Service National Standards* which stipulates that "Research evidences that successful outcomes are most likely when the person on probation has been involved in developing plans."⁴³

- **Provide a first 48-hour plan.** This should include appointments, emergency contact information for probation and other key support agencies, accommodation address, and travel arrangements (including a map of the local area if required).
- **Provide some basic necessities.** Items that will support the prison leaver, covering basic needs and the ability to contact services and attend appointments:
 - » ID documentation
 - » Bank account details
 - » Mobile phone with credit/basic data package
 - » Toiletries
 - » Food for the day of release
 - » Travel passes
 - » Contact and initial appointment details for GP
 - » List of medication (with completed script if necessary).

In this section, we comment on four of the five guiding principles are set out in the Prison Strategy White Paper. We comment on the fifth guiding principle relating to creating a 'compact' with the prison in response to question 11 below.

- **Clarity over who is accountable for improving rehabilitation and resettlement outcomes to reduce reoffending.** Frontline staff and different agencies and organisations should be clear on the roles they need to play at each stage of the resettlement process.

We agree that having designated people with clear responsibilities and accountabilities is vital. This should include clear and obvious ways to contact or arrange meetings with those responsible for providing support/supervision.

- **Take a personalised approach, adapting to challenges faced by certain groups** such as female and older prison leavers, prisoners with learning disabilities, autism or ADHD, the remand population, those on shorter prison sentences and those released on a Friday. This will move away from a one-size-fits-all approach and towards a more personalised and integrated approach based on the individual needs of the offender.

We agree that a personalised approach should be taken. All plans/passports should be co-produced with the person in prison, and where permission is granted with family members. The plan should be developed over time (where possible prior to prison release), allowing trust to be built between practitioners and prison leavers. The plan should also be adaptable, and able to take on new information as it is disclosed, or where issues surface after initial interviews or assessments are completed. This should include a full range of protected characteristics and consideration as to whether the services are offered in a way that makes reasonable adjustments for those characteristics, or whether it is appropriately tailored.

- **Drive improvements across the priority outcomes of accommodation, education and employment, and access to healthcare and substance misuse treatment, but also look at the broader range of factors and services that reduce reoffending.** The passport will be aligned with other key elements of the reducing reoffending agenda, including Integrated Offender Management and Electronic Monitoring that are targeted towards specific cohorts of prison leavers.

We firmly believe that the plan should take into consideration the hopes and aspirations of people in prison and not just plan support around deficits. This could include personal development goals, access to sports or culture and the arts, family, or other hopes and aspirations that people believe will support them to desist from crime.

- **Improve the sequencing of existing processes and new services, streamlining information gathering and sharing.** This should include building on the Offender Management in Custody (OMiC) model, which is focused on strengthening the links between custody and community offender management and reinforcing the importance of prisoners following Sentence Plans which set out the activities they should complete while in prison and on licence after release.

We agree that services must be properly sequenced and managed. To integrate the variety of interventions (including resettlement support and licence conditions) the plan should be held by the responsible probation officer. It is essential that there is an open communication channel and a smooth transition between the OMiC key worker and the probation officer. Our earlier suggestion to embed a voluntary sector coordinator in each prison would enable these plans to better reflect the full range of services that are either on offer or that the person in prison is engaged with.

10. How can we implement the Resettlement Passport approach in a way which is most effective for prison leavers and practitioners?

As set out in the answer to question 9, we believe the resettlement passport requires further user testing and must be integrated into pre-existing processes, such as sentence planning, and provide for some necessities that can support a person in the first 48 hours post-release.

11. How should we encourage prisoners and prison leavers to comply with conditions and expectations in return for support provided, and what consequences should be in place if they do not?

The final principle listed in the white paper regarding the resettlement passport is that it creates, "a compact between the prison leaver and wider society. We will expect prisoners and prison leavers to take personal responsibility for engaging with rehabilitative activity and resettlement support and in return for this improved support, there will be clear consequences if they fail to comply with

conditions where appropriate.” Probation and prison management (alongside the Parole Board) already has the power to set out licence conditions and Post Sentence Supervision (PSS) requirements (for those serving determinate sentences of less than two years), for the purpose of rehabilitation and public protection. A breach of licence conditions can be so punitive as to have someone returned to prison under executive recall, and a breach of PSS requirements can bring someone back before the court to amend or remove requirements and/or recommend a further period in custody or a fine.

It is important that the person leaving prison fully understands the conditions of their sentence, and the reasons for them, but also that these conditions are proportionate and reasonable (in the sense that you could reasonably expect someone to meet the conditions given their personal circumstances). The recently updated Ministry of Justice and HMPPS *Licence Conditions Policy Framework*⁴⁴ provides clear guidance on this. It states: “The aims of the licence period are to protect the public, to prevent re-offending and to secure the successful re-integration of the offender into the community. Licence conditions must be preventative as opposed to punitive and must be proportionate, reasonable and necessary.” Similarly, the *PSS Policy Framework*⁴⁵ states that “The purpose of the PSS period is the rehabilitation of the offender.” Furthermore, it also offers the exceptional circumstances in which it may neither be proportionate or necessary to impose one or more PSS requirements, stating: “If the supervisor decides there is good reason for excluding a requirement prior to release then they must ensure the releasing prison is notified of the reasons for this, so that the releasing Governor may consider it when the licence and supervision notice is prepared. Following release, the removal of default requirements is treated as a variation request.”

The array of licence conditions and PSS sentence requirements are already vast and cover a range of situations and circumstances, and they can also be varied during the sentence. In the case of licence conditions they may include: specifying a place of residency, meetings with named healthcare practitioners, people they may not contact (such as victims or their families), participation in a variety of programmes or activities, possession of certain technology or devices, disclosing a range of personal information, curfew arrangement, limiting freedom of movement, supervision requirements (meetings), extremism related restrictions, polygraph testing, drug testing, and electronic monitoring conditions. There are 14 categories in total, each with subcategories and several options. In many cases, voluntary organisations we consulted recalled instances where so many conditions had been placed upon people that they were unable to manage them and ended up breaching their conditions simply because they could not manage them all or did not fully understand them all.

Tackling reoffending is not a linear process. Desistance theory and research into recovery from substance misuse or moving away from sex work all suggest that the path toward rehabilitation includes relapses along the way. If our resettlement approach is empathetic and focussed on harm reduction, then it will deal with those relapses in a humane and flexible way (as is permitted in the policy frameworks referenced above). The person under probation supervision should reasonably expect unconditional support from the service. This is especially true where aspects of the plan require the prison, probation, or other agency staff to support them, including in relation to getting an ID and/or bank accounts, securing accommodation on release, accessing healthcare (such as mental health or drug recovery services), making a universal credit claim, and accessing education, training, and employment.

12. Do you agree with our long-term vision?

We have commented on the individual aspects of the long-term vision below. There are four notable omissions from the long-term strategy which voluntary sector organisations would like to see added.

Omission 1: tackling racism

Despite numerous reviews into the overrepresentation of racially minoritised people and their experiences of racism within the justice system (from arrest to imprisonment) the strategy remains largely silent on the national or local focus to address it. There needs to be a clear prioritisation and resourcing of activity to tackle racial disparity and appropriate monitoring of outcomes locally and nationally to ensure this is happening. This includes investment in nationally or locally commissioned services and key performance indicators (KPIs) that clearly stipulate how progress towards racial equality will be measured and reported upon.

Omission 2: partnership and voluntary sector engagement

As we have set out in other areas of this consultation response, the white paper does not explain how, either nationally or locally, the prison system will engage with voluntary organisations (or other statutory and non-statutory partners). Employing a voluntary sector coordinator in each prison to proactively engage and support the coordination of voluntary and community organisations in prison is a simple, cost effective, and proven solution which the Ministry of Justice should include in its strategy.

Omission 3: volunteering

The lack of mention of volunteers or volunteering in the prison strategy is a significant oversight. Our *Valuing Volunteers in Prison* report,⁴⁶ commissioned at the request of then Minister for Prisons and Probation Andrew Selous MP, explored how we can increase the amount and scope of prison volunteering across England and Wales. We surveyed 627 volunteers and 119 volunteer managers from across 121 prisons. We visited 12 prisons, interviewed 31 prison staff and 30 staff from voluntary organisations and collected 14 case studies of good practice in volunteer involvement. We also worked with User Voice to capture the views of people with lived experience of the criminal justice system in *Valuing Volunteers in Prison: The views of service users*.⁴⁷ They undertook a peer-led consultation to explore perceptions of volunteering in prison from the perspective of prisoners. The findings demonstrated that volunteering has tangible benefits. It is a rewarding and enriching experience for volunteers and brings an influx of new skills and outlooks to prison work. However, we also found barriers to successful volunteering in prisons. Conditions in some prisons make volunteers' work difficult. To genuinely value volunteers the prison strategy must commit to:

- Clearly identifying roles for volunteers
- Prisons and their partners proactively recruiting volunteers from as diverse a range of backgrounds as possible
- Properly coordinating volunteering to help support a positive rehabilitative culture.

To support greater involvement of volunteers, Clinks has produced multiple guides for quality volunteer involvement in prisons and offers training to support volunteer coordinators/managers, all of which could radically improve and increase volunteering in the prison system.

Omission 4: lived experience involvement

The strategy fails to set out a national strategic approach to engaging people with lived experience in the design, delivery and evaluation of strategy and services. That includes changing the culture within prisons to gear people towards user-involvement, as well as the skills of prison staff to deliver it. It also neglects to explore different methods through which people in prison could be engaged (through approaches like User Voice's councils), or people with prior experience of imprisonment through employment as prison officers, members of advisory forums, or peer researchers.

Feedback on the long-term vision

- **Ensuring prisoners can access the treatment they need, when they need it, including offering abstinence-based rehabilitation, and putting the right support in place to ensure that this continues upon release, working together with our health partners.**

The strategy is right to state that, "Too many offenders with mental health problems trip up into prison, and too many are being made worse. To prevent offenders being pulled into prison who should not be there, we will continue our work to divert offenders away from prison and into community treatment where this is appropriate. This preventive approach will deliver greater public protection by ensuring those who need mental health treatment to address their offending behaviour get early support in the right setting." The quality of mental health treatment needs improving, but so does our understanding of the scale of the issue.

The strategy needs to address this gap in data. HM Inspectorate of prisons' survey of prisoners found only 40% men and 51% of women with mental health problems had received support.⁴⁸ This particularly impacts racially minoritised people, who are less likely to be identified with mental health concerns on reception at prison.⁴⁹ In 2009, *The Bradley Report* found that prisons were struggling to provide services for people with mental health issues effectively, and noted that, "it is widely accepted that the impact of prison on mental health is far from positive."⁵⁰ Over ten years on, the available evidence points to largely the same conclusion – that prisons are often inappropriate environments for people with mental health needs due to a lack of identification and responsiveness to these needs. In 2016, 70% of people who died from self-inflicted means whilst in prison had already been identified as having mental health needs. In 2019, the Prisons and Probation Ombudsman (PPO) found that concerns about mental health problems had only been flagged on entry to the prison for just over half of these people.⁵¹ The PPO also found that no mental health referral was made when it should have been in 29% of self-inflicted deaths where mental health needs had already been identified. At a third of prisons inspected in 2019, officers had not undergone adequate mental health awareness training, despite repeated recommendations.⁵²

The strategy must be clear about the scale of investment required to meet the need. Therefore, we welcome the forthcoming *National Mental Health Needs Analysis*, commissioned by NHS England and NHS Improvement (NHSE/I). The strategy must set out a clear co-commissioning plan of

action with health partners, therefore we welcome NHSE/I's refresh of the prison-based mental health service specifications. We urge both NHSE/I and the Ministry of Justice to fully reflect on the role voluntary organizations could take in the design of these services as well as the role they already take in delivering them. The strategy includes several initiatives that we welcome, such as:

- The aim to ensure all prison leavers are registered with a GP
- The continued roll-out of NHS England and NHS Improvement's RECONNECT, a care after custody service, which supports prison leavers in England to remain engaged with the right treatment upon resettlement through referrals into community health services, including for those with substance misuse needs
- The introduction of Health and Justice Partnership Coordinators in every probation region in England by 2024/25, and the stated focus to commission services for people with dual diagnosis of mental health and substance misuse issues
- The refresh of the National Partnership Agreement for Healthcare in Prisons in England to include people under probation supervision in the community.
- **A transformed Prisoner Education Service with a focus on giving prisoners the skills and opportunities to secure a job on release. With this, prisons will be used to improve the numeracy and literacy of every prisoner, by embedding learning across the prison in workshops as well as classrooms; and deliver skills and improve the qualifications of every prisoner, by working in partnership with employers to deliver the high-quality training needed to fill labour market gaps and help to level up the economy.**

The focus on prison education and support for people to gain employment is generally welcome, and the need for reform in the case of education is clear. Performance of prisons as assessed by Ofsted shows that over the last 5 years, around 60% of prisons were graded as inadequate or requiring improvement compared with just 20% of provision in other areas of the further education landscape that they inspect. The latest Ofsted annual report showed how far prison education needs to come before it can be deemed appropriate. It included the following comment on prison education:

"Of all the areas we inspect and regulate, the worst practices and outcomes have long been found in prisons and secure provision for children and young people. Year after year, we have highlighted the deficiencies in prison education and the knock-on effect this has on the rehabilitation and reintegration of offenders. Covid restrictions in the secure estate – which includes young offender institutions and secure training centres – have made a bad situation much worse."⁵³

Voluntary organisations at our consultation events welcomed the necessary focus on numeracy and literacy but were concerned that the Prison Education Service lacked enough detail to assess whether it represented an improvement of the existing Prison Education Framework (which also focussed on improving numeracy and literacy). Prior to launching a new Prison Education Service, the Ministry of Justice must:

- Publish an evaluation of the Prisoner Education Framework, and related Dynamic Purchasing System that was established to enable the commissioning of education services by prisons

- Return to Dame Sally Coates' 2016 review⁵⁴ into prison education and clearly state whether it is continuing to adopt those recommendations, or what progress it has made towards implementing them
- Refer to the Digital, Culture, Media and Sport committee's recommendations relating to arts in the prison estate and what progress it has made against the recommendations it accepted⁵⁵
- Pause to consider the findings that will come from the recently announced joint review of prison education by Ofsted and HM Inspectorate of Prisons.⁵⁶

If the Prison Education Service is to genuinely reduce reoffending it must include a broad curriculum that includes approaches which support people to gain the skills and confidence that will allow them to enter the classroom. As Dame Sally Coates indicated in her review, the purpose of education cannot solely be employment:

“Employment has been shown to play a key role in reducing reoffending. However, ‘employability’ should not drive the entire focus of the curriculum. Many prisoners will have previously had unsatisfactory experiences of the classroom. They will need encouragement and support to take their first learning steps. This should include greater provision of high-quality creative arts provision, and Personal and Social Development courses. Both improve self-knowledge, develop self-confidence and therefore help tackle reoffending.”

The arts organisations we engaged as part of this consultation were clear that many of their services support people to become motivated enough to engage, and they were disheartened to see that the support given to the creative arts in Dame Sally Coates' review was absent from the prisons white paper. Embedding the arts in prison culture and education will deliver tangible outcomes. Research by the Cultural Learning Alliance⁵⁷ into the case for cultural learning found the following:

- Participation in structured arts activities can increase cognitive abilities by 17%
- Learning through arts and culture can improve attainment in Maths and English
- Learning through arts and culture develops skills and behaviour that lead children to do better in school
- Students from low-income families who take part in arts activities at school are three times more likely to get a degree
- Employability of students who study arts subjects is higher and they are more likely to stay in employment
- Students from low-income families who engage in the arts at school are twice as likely to volunteer
- Students from low-income families who engage in the arts at school are 20% more likely to vote as young adults
- Young offenders who take part in arts activities are 18% less likely to re-offend
- Children who take part in arts activities in the home during their early years are ahead in reading and Maths at age nine
- People who take part in the arts are 38% more likely to report good health.

We welcome the drive to bring prisons into the 21st century by increasing the use of technology in prisons. Covid-19 restrictions have forced innovation in prisons. This should continue to be built on to develop more creative solutions for supporting learning and remote education in the future and enabling services to expand their reach. The lack of IT in prisons has made adapting education services and supporting distance learning more challenging, shining a spotlight on the divide between education and learning in the community and in prison.

- **A step change in offenders going into work inside prisons, on Release on Temporary Licence (ROTL) and on release.**

Clinks has long called for an increase in the use of ROTL to support resettlement and rehabilitation and called for the government to radically overhaul its approach to ROTL⁵⁸. In addition, we believe for ROTL to be successful it needs to engage the widest range of voluntary organisations possible to support ROTL placements in the community. We believe the strategy should set out with greater clarity how it intends to work with other sectors, including the voluntary sector, to maximise the availability of ROTL placements.

- **No one leaving prison at risk of homelessness without the offer of temporary accommodation, taking into account their offending risk level, and with a pathway to secure stable, long-term housing.**

We agree that this would make a dramatic difference to the likelihood of reoffending. It will be as important to make sure that any temporary accommodation is appropriate and of a decent standard. However, the approach must provide both housing and localised support for those accessing it. The Ministry of Justice should commit to a Housing First approach,⁵⁹ with an increasing range of independent evaluations,⁶⁰ and evaluations of government sponsored programmes.⁶¹ Given the promising research, domestically and internationally, in relation to housing first, and the fact that the Ministry of Justice's own Offender Accommodation Pilot projects are based on this approach, any strategy for accommodation must seek to learn from the Housing First approach. It must also assess the outcomes of the Offender Accommodation Pilot, and ensure that it meets the following principles (as set out by Housing First approaches):

- People have a right to a home
- Flexible support is provided for as long as it is needed
- Housing and support are separated
- Individuals have choice and control
- An active engagement approach is used
- The service is based on people's strengths, goals, and aspirations
- A harm reduction approach is used.

The Ministry of Justice must set out how it will provide people with ongoing and flexible support to maintain tenancies when they are placed in stable long-term accommodation.

- **Effective accountability using data, KPIs, earned autonomy and league tables to drive up best practice and performance in the priorities outlined above, such as increasing progress in English and Maths, and prisoner attendance in education, and the number of prison leavers in employment at 6 weeks and 6 months after release.**

Performance measures must provide nationally aggregated and local prisons-by-prison data to assess current and past performance. As part of this strategy the Ministry of Justice should consult on draft measures, engaging experts in the voluntary sector to advise on measures that can usefully track someone's progress in, for example, housing, drug recovery, mental health, education, or employment. Once these measures are confirmed, performance against them should be available to the public.

The strategy should prioritise investment in high quality research, especially studies that involve staff and people with lived experience. A clear budget and research priorities should be published and consulted on. High quality research that is peer reviewed and published will give the system greater insight into the how the prison system is performing and how it could be improved. Wherever possible this research should be openly tendered and commissioned from independent institutions/researchers.

13. Where can we go further in turning prisoners away from crime?

We maintain that prison is not a place where all people can turn their lives around. Many would achieve better outcomes in the community. As of 31 December 2021, the prison population totalled 79,092 men and women,⁶² yet large numbers could be managed more successfully in the community. That includes many of the 3,428 **people sentenced to prison for less than a year**, the 12,780 **people held on remand**, and the 9,559 **people who had been recalled to prison** through breach procedures. Between them they make up almost a third of the prison population and would be better managed in the community with the added benefit of significantly reducing demand on an overcrowded prison estate. The strategy must also consider the **role of diversion** in reducing the prison population.

Short prison sentences

Community sentences remain the most effective way to turn people away from crime, yet we continue to put people in prison for relatively minor and non-violent crimes. Revolving Doors Agency's 'short-sighted' campaign showed that the public and ministers from across the political divide support replacing short prison sentences with more effective community sentences.⁶³ The Ministry of Justice's own 2019 analysis shows that community sentences more effectively reduce reoffending,⁶⁴ stating all community sentences reduced reoffending by 4% when compared to either a three, six, or 12 month long prison sentence, and that the average number of reoffences committed by someone sent to prison for less than 12 months was greater (by around 65 reoffences per 100 sentencing occasions) than someone on any type of community sentence.

Court cases where a pre-sentence report (PSR) is completed are ten times more likely to receive a community sentence than one without a PSR, yet the number of PSRs has declined by over two thirds over the last decade.⁶⁵ Increasing the number of PSRs would likely divert more people away from unnecessary short custodial sentences and into more effective community sentences.

Remand

The situation for those held on remand needs to be tackled urgently. Apart from increased bail accommodation for women on remand, the strategy is silent on the male remand population. The Ministry of Justice's quarterly statistics⁶⁶ show a 6% rise in the remand population. One in 10 are found not guilty at court and released, a further one in four are not sent to prison following trial (instead receiving community sentences). There has been a 68% rise in self-inflicted deaths amongst remand prisoners compared with 28% in the general prison population. Over half of the remand population are there for non-violent crimes, including drug or theft offences.⁶⁷ Prison is a completely inappropriate place to hold people awaiting sentencing unless there is a clear risk of harm to the public.

Recall

Almost 10,000 people are in prison for breaching their licence conditions or sentence requirements in the community. Over the course of 2020-2021, probation recalled 26,970 people to prison, including 8,902 people serving determinate sentences of less than 12 months. Of those 8,902 men and women recalled only 36% of cases cited a further criminal charge (25% for women). 46% of cases cited 'failing to keep in touch', and 77% cited 'non-compliance'. If the probation service could maintain supervision in the community for a greater number of people at risk of recall, it could achieve a significant reduction in the prison population.

Diversion

The strategy needs to fully address means of diverting people away from prison and into more appropriate community sentences or support. The increased number of police officers that are cited as the main reason the prison population will increase in the future could be deployed in services like DIVERT, which can channel people away from the justice system at the point of arrest. A similar approach in the USA (LEAD) has reduced reoffending by diverting people prior to, or at the point of arrest.⁶⁸ The roll out of NHS commissioned Liaison and Diversion, and the more recent piloting of the RECONNECT model are both valuable interventions that seek to get people the mental health support they need, either to divert them into support services prior to custody, or to ensure access to the right support on release. The prison strategy and prison population projections are completely silent on the role diversion can play to reduce reoffending, protect the public, and reduce the prison population. The government should be detailing cross-government approaches and investment in expanding diversionary services.

Chapter Four – A New Approach to Women’s Prisons

14. Do you agree with our long-term vision for women’s prisons?

The Ministry of Justice’s *Female Offender Strategy*,⁶⁹ published in 2018, was largely welcomed by the voluntary sector. It provided an evidence-based foundation for the strategic priorities set out. Its desire to address women’s needs in the community through diversion or community sentences supported by specialist women-only services rather than in an inadequate and geographically dispersed prison system, is the right strategy. For that reason, we do not believe the prison strategy should include a focus on women (in the same way it does not focus on children). The response to women in the criminal justice system should be led by the Female Offender Strategy and the governance put in place to support that.

We fully endorse the recommendations made by the National Audit Office’s 2021 report into improving outcomes for women in the criminal justice system.⁷⁰ They are also right to point to good practice examples, such as the Greater Manchester whole system approach, to highlight the positive impact that concerted local approaches that involve the public and voluntary sector can make to the lives of women caught in the criminal justice system.

The government needs to retain its focus on diverting women away from the criminal justice system wherever possible and provide sustainable funding for specialist women’s organisations in the community. To this we and many across the voluntary sector are against the building of 500 additional prison places for women that was announced in January 2021.⁷¹ Any new prison buildings must be coupled with the decommissioning of an equivalent or greater number of women’s prison places in other establishments.

There are six aspects within the Prison Strategy White Paper that are welcome, and we believe they support the implementation of the *Female Offender Strategy*, including:

- **A trauma-informed and trauma-responsive women’s estate.** This will require liaison with expert organisations that specialise in trauma informed practices to support prisons to meet that aim. Many of those experts work within the women’s sector and should be engaged to fully assess what needs to change culturally and operationally to really enable this change.
- **A re-stated commitment to reduce the number of women in prison.** We maintain that the aim of the female offender strategy must be maintained, focussing on providing specialist support in the community, and prioritising community sentences over short custodial sentences. Where new prison places are built, an equivalent amount of prison places should be decommissioned from the existing prison estate.

- **Develop and implement mandatory training for staff in women’s prisons to address the diverse needs of all women in their care.** This is vitally important to increase cultural competence and reduce discrimination. This training should be developed by commissioning support from voluntary organisations that are led by and focused on racially minoritized people who have the relevant knowledge and expertise. The strategy should set out how it will commission the development and delivery of this training.
- **Specialised recruitment and training proposal which will ensure that staff working with women prisoners are selected and trained to be able to effectively support women who self-harm and those who have experienced domestic violence and sexual abuse.** This should be tested with specialist women’s organisations. Recruitment and selection processes should include the involvement of women with lived experience of prison to assess the appropriateness of candidates.
- **Produce a Young Women’s Strategy.** As members of the Transitions to Adulthood Alliance (T2A) we welcome the production of a Young Women’s Strategy and recommend that T2A members, and young adult women themselves, are involved in its design. The strategy must also involve and learn from HMI Prisons’ 2021 thematic inspection into young adults in custody.⁷² The strategy must also build upon the pre-existing HMPPS,⁷³ parole board⁷⁴ youth to adult transitions in Wales⁷⁵ guidance. The strategy must consider the unique issues relating to over-represented groups in the young adult cohort, including racialised groups and care leavers.
- **Reducing the number of women held in prison on remand by enabling more women to successfully access bail.** The prison strategy white paper is right to point out that “each year, approximately half of all women entering prison do so on remand and approximately two-thirds of those remanded to prison at the Magistrates’ Courts are later found not guilty or given a community-based sanction following conviction.” The use of prison for most women awaiting sentencing, especially given the vulnerabilities they face, is unnecessary and counterproductive. Enabling more women to successfully access bail is welcome. In line with the NAO recommendations on the *Female Offender Strategy*, the *Prison Strategy* should set a clear target to reduce the number of women held in prison and remand and track progress against it. This metric should be overseen by the governance arrangements relating to the female offender strategy.

In relation to **increased support for pregnant people and mothers in prison**, we maintain that pregnant women and mothers should be diverted from prison in all but exceptional circumstances where the offence is so serious that there is no suitable alternative to prison. In Clinks’ evidence review on maternal imprisonment,⁷⁶ Dr. Lucy Baldwin (Senior Lecturer in Criminology, De Montfort University) makes a clear case for community alternatives and notes the significant harm of maternal imprisonment for both the women affected and their children. Looking at the criminal justice response to the problem Dr. Baldwin states:

“The Farmer Review for Women (Ministry of Justice 2019) and the Female Offender Strategy (Ministry of Justice 2017) both echoed Corston (2007) in the argument that ‘wherever possible,’ alternatives to custody for women should be the preferred option, especially for pregnant mothers and those with dependent children. Yet despite international guidance from the Bangkok Rules (OHCHR, 2010) and The Joint Committee on Human Rights report on the Right to family life: Children whose mothers are in prison (2019), pregnant mothers, mothers of children under two and mothers with dependent children, are still

regularly sentenced to imprisonment in the UK (see also Minson 2014 and Epstein 2012). This continues despite over thirty years of evidence from academia, practice and policy makers demonstrating that prison rarely works effectively for women, and in fact often does more harm than good (Corston 2007). Tragically, in the last two years alone, two babies have died in prison when their mothers have given birth in prison, and another baby died on the way to hospital. This is not acceptable and although reviews into pregnancy and new motherhood in prison have been undertaken and another is underway – this risk will only be removed if we stop sending pregnant women to prison at all (see also Abbott et al 2020)."

Where there is no alternative to prison, there must be high quality care. Therefore, we welcome:

- The partnership work with Department for Health and Social Care, NHS England and NHS Improvement, and the Ministry of Justice's contracted partners to continue to improve the support available to mothers in prison
- The enhanced Pregnancy and Mother and Baby Liaison Officer role in every women's prison
- The jointly commissioned multi-organisational National Women's Prisons Health and Social Care Review Group with the aim to improve health and wellbeing outcomes for women in prison
- Proposals to introduce family units in all women's prisons
- Proposals to expand the use of Mother and Baby Units.

We are interested to see the results of a pilot study on the **introduction of on-site social workers** and welcome it as progress against the recommendation made in Lord Farmer's review,⁷⁷ in which he called for "the need to deploy prison-based social workers as part of a multi-disciplinary custodial team." We are concerned that the strategy recommends rolling out this approach to all prisons before it has assessed the impact of the pilot study. Independent evaluation should be conducted and published to support any policy decision about a roll out to all prisons. In addition, if the service is rolled out the prison strategy must be clear as to how that service will be commissioned in the future and where the funds will be sourced to pay for the roll out.

15. What more could we do to support women in custody, with particular reference to meeting the needs of women prisoners with protected characteristics?

More funding needs to be allocated to meet the needs of women with protected characteristics.

We know already know that racially minoritised women are overrepresented in prison⁷⁸ and face discrimination within the system.⁷⁹ The Ministry of Justice's *Female Offender Strategy* suggested the following in relation to racially minoritised women: "Given the over-representation of Black, Asian, and minority ethnic (BAME) women in the CJS, we want to see funding used to address the needs of this cohort, as well as those of other cohorts of women with protected characteristics who find it difficult to access services. Applications to the grant competition will be required to show how they will increase engagement with such cohorts, and support them." If the strategy genuinely wants to address the needs of racially minoritised women, then it must invest in new services for them.

Because many of these organisations are smaller and will be exploring untested approaches, they should be grant funded, taking a similar approach to the Regional Outcomes and Innovation Fund developed by the Ministry of Justice's Probation Programme. It should develop this approach with the Ministry of Justice's Female Offender Minority Ethnic Working Group.

We also urge the Ministry of Justice to consider the recent 10-point action plan for change to improve outcomes and reduce inequalities and discrimination against Black, Asian, minoritised and migrant women in contact with the criminal justice system; developed by Hibiscus Initiatives, Muslim Women In Prison, Zahid Mubarek Trust, Criminal Justice Alliance, and Agenda.⁸⁰

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

We recommend that the financial envelope for the **Residential Women's Centre** pilots is communicated, and full, open consultation with voluntary organisations takes place in addition to market engagement.

Chapter Five – Our People

16. Are there specific areas of training you think we should be offering prison officers which we do not already?

We welcome the prison strategy's ambition to improve the skills and expertise of prison staff, support the recruitment and retention of new staff, and provide improved managerial support. The voluntary organisations we consulted were particularly keen that the training for officers is improved. They were particularly concerned about the capability of new recruits who had not experienced 'normal' prison regimes due to the restrictions imposed by Covid-19, but also the general inadequacy of the 10-week Prison Officer Entry Level Training (POELT) course, and especially the 'Advance into Justice' programme, which can fast track assessment-to-employment in as little as four to six weeks.⁸¹

The training mentioned in the prison strategy covers a wide range of specialisms, from education and training skills to improve literacy and numeracy, training on the needs of older offenders and how to identify dementia, equipping prison staff to understand mental health and substance misuse needs, working with people with learning disabilities and autism, and supporting staff to recognise health needs and support people to access the right support. The prison strategy must make clear how this training will be delivered, and whether it will be a part of POELT or delivered through other means.

The voluntary organisations we consulted recommended that the following training be included:

- **Training on the causes of crime.** Supporting prison staff to better understand the research and life journeys that may lead some people to commit crime.
- **Cultural competency training.** Supporting people to understand the experiences of racially minoritised people including of structural and institutional racism and how these might impact their engagement with the prison system, and to tackle any conscious or unconscious bias.
- **Trauma training.** The same support given to staff in the female estate needs to be rolled out to all staff, given that both men and women in prison have often experienced significant trauma that may affect their behaviour and ability to engage.
- **Training on partnership engagement.** This would cover how the prison can become more accommodating to outside agencies, including the voluntary sector, which provide services within the prison.
- **Off-site training via secondments.** Staff should be allowed to develop themselves through secondments or short-term placements at services that work within prisons, especially voluntary organisations that deliver rehabilitative services. This will allow staff to see diverse approaches and develop skills in a variety of different service settings.

The training listed in the prison strategy and above would support prison officers to understand and better support the people in prison, but it is important to be clear about what a prison officer can be reasonably expected to do. The strategy must make clear, as the Probation Target Operating Model does, that the prison system will benefit from its commissioned services and other partner agencies who bring specific expertise into prisons. This will support the prison service to consider what support it needs from external organisations.

Chapter Six – Delivering Better Outcomes in Prison

18. Are there any areas where we should extend autonomy for all Governors to support the delivery of improved outcomes?

We believe Governors should have the ability to commission interventions to meet the diverse needs of their populations. To achieve this, prisons need to be allocated a budget that they can spend on services that they believe will address identified needs. This would be comparable to the commissioning power devolved to regional probation leadership through the Regional Outcomes and Innovation Fund. Furthermore, Governors should be provided clear guidance on when funding should be competed as a contract or a grant. We recommend that all funding aimed at testing innovative methods is grant funded.

To support the prison to engage with a diverse range of services, they need to have the resources to develop local partnerships. We reiterate our recommendation that every prison employs a voluntary sector coordinator. Clinks has already evaluated a successful model for voluntary sector engagement by employing local coordinators.⁸² A small investment will allow prisons to better engage local and/or specialist organisations, increase their partnership work, and increase the support available to both prison and probation staff.

The white paper proposes a KPI framework that particularly focusses on:

- Zero-tolerance to drugs, weapons and other aspects of safety and security such as reducing deaths and self-harm
- Drug rehabilitation and a focus on moving towards meaningful recovery, through abstinence
- Education training including literacy, numeracy, and skills for work
- Strengthening resettlement through accommodation outcomes and family ties.

With the benefits of autonomy comes a greater risk of inconsistency. The Ministry of Justice needs to decide the things that are essential and non-negotiable and KPIs should reflect this. It is important that these KPIs are consulted upon, allowing the expertise of the voluntary sector to inform them. For instance, drug recovery specialists that we consulted were clear that KPIs had to include progress towards recovery as much as abstinence approaches (in line with the government's recently published 10-year drug strategy). Education specialists we consulted were clear that although numeracy and literacy were of critical importance, so was a more varied curriculum that enabled people to reconnect with education through arts and cultural approaches, or to progress to higher education such as Open University courses. Collaboration with the wider sector to develop outcome measures would develop a stronger set of measures.

We recommend that the KPI framework covers collaboration, and that this KPI is based on Expectation 81 of HM Inspectorate of Prisons' criteria for assessing the treatment and conditions for men in prison.⁸³ This includes that:

- Relevant voluntary and community sector organisations are supported to work with prisoners
- A named manager is responsible for coordinating the work of voluntary and community sector organisations.

Finally, to really understand how people in prison experience the system, and what they think works or does not, it will need to find means to engage them. This has been achieved through approaches like User Voice's service user councils, Leaders Unlocked engaging young adults, Revolving Doors Agency's engagement through lived experience forums and peer researchers, or Prison Reform Trust's Prison Policy Network. The prison should work with experts in the voluntary sector to develop a KPI on the involvement of people with lived experience.

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Our vision

Our vision is of a vibrant, independent and resilient voluntary sector that enables people to transform their lives.

Our mission

To support, represent and advocate for the voluntary sector in criminal justice, enabling it to provide the best possible opportunities for individuals and their families.

Join Clinks: be heard, informed, and supported

Are you a voluntary organisation supporting people in the criminal justice system?

Join our network of over 600 members.

Clinks membership offers you:

- A voice to influence change
- Practical assistance to be effective and resilient
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Membership starts at just £20 per year and is free for organisations with little income.

www.clinks.org/membership

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