

Prison Reform Trust response to the Labour Justice and Home Affairs Policy Commission – June 2019

The Prison Reform Trust (PRT) is an independent UK charity working to create a just, humane and effective penal system. We do this by inquiring into the workings of the system; informing prisoners, staff and the wider public; and by influencing Parliament, government and officials towards reform. The Prison Reform Trust provides the secretariat to the All Party Parliamentary Penal Affairs Group and has an advice and information service for people in prison.

The Prison Reform Trust's main objectives are:

- reducing unnecessary imprisonment and promoting community solutions to crime
- improving treatment and conditions for prisoners and their families
- promote equality and human rights in the criminal justice system.

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1. What do you think are the key drivers of criminality in young people and how can schools, the police, local authorities and others work together to address these?

The strongest evidential link, suggestive of causation rather than mere correlation, in respect of children (all under 18s) and criminality is if a child has been excluded from school (see the findings of the Edinburgh Study of Youth Transitions and Crime, the only large scale—4,300 children—longitudinal study of police-recorded crime data).¹ It follows from this that action to reduce the number of children excluded from school, and to improve alternative education provision (APs) for those who are excluded, must be the key element of any early intervention initiative.

2. What should be the core responses of each public service when a young person is at risk of offending or has offended?

There is also good evidence that diversion programmes work well when children are first reported for criminal activity.² The best diversion programmes are led by the Police and direct the meeting of children's needs out of the youth justice system altogether, thereby reducing the risk of labelling and stigmatising that comes with contact with criminal agencies and which can be criminogenic (a criminogenic system is one that is likely to cause criminal behaviour, in this context by either encouraging children to think of themselves as criminals and to adopt behaviour accordingly, or to encourage others to interpret their conduct as that of criminals).

¹ Available at <http://www.esytc.ed.ac.uk/>

² Available at <https://campbellcollaboration.org/library/police-initiated-diversion-to-prevent-future-delinquent-behaviour.html>

Often crime can occur because a child or their family's needs for other services are not being met (for example mental health support, learning disability services, housing being typical). These more fundamental needs have to be addressed rather than simply providing the sticking plasters that criminal justice services can sometimes be.

What does not work as early intervention with children is punitive responses, in particular short sentences. The 'short sharp shock' approach of the 1979 Conservative government failed to deter children from offending, as did the increase in the use of custody in the early period of the Labour government of 1997. Offending by children only reduced when less use was made of the criminal justice system and fewer children were brought into the youth justice system (from 2006 onwards).

3. How can public services work better together to identify those at risk of offending?

Each local area needs to have a multi-agency youth crime prevention strategy, jointly led by the local Director of Children's Services and the chief officer of Police, and not by the Youth Offending Team (YOT). This needs to be overseen by a senior level multi agency Board.

However, the YOT model has worked very well once children have developed a serious pattern of offending and should be retained for these children.

One approach, popular in the 2000s, which has been largely discredited by the science, is basic intervention on Risk Factor Analysis. Difficulties in predicting who will and who will not offend mean that two wrong guesses are made for every right one, with a consequence that children can become at risk of being criminalised through system contact by the very approach that is aimed to help them avoid criminal behaviour.

The core element, therefore, of each public response should be to enter into a public partnership that is explicitly committed to diverting children away from the criminal justice system, to identifying the needs that they and their families have, and meeting these, wherever possible, without recourse to labelling them as 'criminals'.

Pure risk factor analysis should be avoided but the early signs of actual trouble, which will normally include low level offending behaviour, requires co-ordinated multi-agency responses as part of an explicit orientation to divert children away from offending.

4. How can courts work more closely with local authorities, health service, probation providers and other public bodies, as well as the third sector, to address underlying behaviour?

The well-publicised failure of the government's Transforming Rehabilitation reforms has created significant problems for probation services, courts, and voluntary sector providers.³ The government's recent decision to reverse the majority of the reforms is

³ See HM Inspectorate of Probation (2019) Post-release supervision for short-term prisoners: The work undertaken by Community Rehabilitation Companies, Manchester: HMIP; House of Commons Public Accounts Committee (2019) Transforming rehabilitation: progress review, London: HM Stationery Office;

a necessary step towards rebuilding confidence in community sentences and overturning a period of significant decline in the morale of frontline probation services. It is also critical if a presumption or ban on short sentences is to be introduced (see question 5).

In order to enable courts to make informed decisions regarding sentencing, it is vital that sentencers have all the necessary information regarding the circumstances of the defendant and confidence in the sentences being recommended to them. Probation plays a critical role through the delivery of pre-sentence reports, to inform the court of underlying factors that may be contributing to a person's offending behaviour, or issues which could influence a sentencing decision—such as being a primary carer, or having a mental illness—and in turn raising awareness and confidence in available non-custodial sentencing options.

Despite this, there has been a dramatic decline in the use of pre-sentence reports in recent years, with research suggesting that this may be linked to a decline in community sentencing.⁴ Between 2012–2018 the number of court reports fell by 41%, whereas the number of people sentenced by the courts fell by only 5%. There has been a large shift away from the use of Standard PSRs towards oral Fast Delivery PSRs, even in the Crown Court.⁵ We are concerned that practice in the preparation of pre-sentence reports may have developed in a way that prizes speed over quality without sufficient regard to the circumstances where an unjust or inappropriate sentence may result.

The serious problem is the lack of time to prepare reports, and the expectation that most will be done on the day. A good report will require access to a wide range of information from different agencies, and potentially consultation with the authors of that information as well as those who might provide an appropriate intervention/support in order to avoid custody. Those issues are compounded if the defendant has learning disabilities or difficulties, or autism. The overriding emphasis on speed must be foregone in the interests both of justice and a more efficient use of scarce resource in the system as a whole.

There are effective models of joint work such as liaison and diversion services which see healthcare and criminal justice staff working together to identify, and where necessary divert people away from the criminal justice system and into treatment and care. This year marks the 10th anniversary of Lord Bradley's seminal review, and we support the continued roll out of these services across England. However, roll out of L&D services must be matched by better investment in and coordination of services in the community including mental health, drug and alcohol treatment. For instance, the devolution of commissioning of drug and alcohol services to local authorities, which at the same time have experienced some of the steepest cuts of all bodies in the public sector, has resulted in a fragmented delivery landscape where services for offenders are frequently under-resourced and deprioritised.

For women, many of the solutions lie in improved and sustained investment in women's community services. Compliance with section 10 of the Offender

National Audit Office (2019) Transforming Rehabilitation: Progress review, London: NAO; and House of Commons Justice Committee (2018) Transforming Rehabilitation, London: HM Stationery Office

⁴ Centre for Justice Innovation (2018) The changing use of pre-sentence reports, London: CJI

⁵ Table A4.24, Ministry of Justice (2019) Offender management statistics quarterly: October to December 2018, London: Ministry of Justice

Rehabilitation Act 2014, which recognises women's distinct needs, should include a commitment to specific outcome measures for women in relation to:

- Accommodation.⁶
- Women's primary care responsibilities for children.⁷
- Women's histories of victimisation, trauma and abuse.⁸
- Women's unmet mental health and problematic substance use needs.
- The specific needs of Black, Asian and Minority Ethnic Women and Muslim women who are over-represented in prison.⁹
- The specific needs of foreign national women and trafficked women.¹⁰
- The specific needs of women with learning disabilities.¹¹

So far as children are concerned there are strong arguments for developing a more child-focussed approach to dealing with children before the courts. Key elements of this would be:

- dispensing with language (legalese, Latin) and dress (robes) that is designed to intimidate but actually only mystifies and confuses children, thus reducing any chance of learning from the experience;
- require all legal practitioners appearing in children's courts to have undertaken child-specific training and therefore to be 'ticketed' to practice with children;
- retaining trial by (a probably smaller) jury but take proceedings out of the adult Crown Court buildings; and
- creating a route by which cases can be transferred from the Youth Court to the Family Court when it is obvious there are untreated welfare needs that are at the root of the offending.

We should also learn lessons from our nearest neighbours. The introduction of the presumption against custodial sentences of less than three months in Scotland, now to be extended to 12 months, and the creation of Community Justice Scotland could provide important learning for boosting support for more effective community sentences which tackle the underlying causes of a person's offending, and reducing our reliance on custody.

⁶ Prison Reform Trust and Women in Prison (2018) Home truths: housing for women in the criminal justice system, London: Prison Reform Trust

⁷ Beresford, S. (2018) What about me? The impact on children when mothers are involved in the criminal justice system, London: Prison Reform Trust

⁸ Prison Reform Trust (2017) "There's a reason we're in trouble": Domestic abuse as a driver to women's offending, London: Prison Reform Trust

⁹ Prison Reform Trust (2018) Still No Way Out: Foreign national women and trafficked women in the criminal justice system, London: Prison Reform Trust

¹⁰ Ibid.

¹¹ Prison Reform Trust (2019) Out of the shadows: Women with learning disabilities in contact with and on the edges of the criminal justice system, London: PRT

5. It is not in the interest of society or the individual for persistent low-level offenders to serve very short sentences in prison, further exacerbating problems of overcrowding, and reducing their chances of rehabilitation. How can sentencing be rationalised to address these issues?

It is welcome that there is now a clear political consensus on the damage that short prison sentences do, with all parties acknowledging the established evidence.¹² We hope that this will hasten legislative efforts to limit their use and invest in more effective community responses to offending.

England and Wales should follow Scotland's lead in by introducing either a ban or a presumption against the use of sentences of under a year. This must be done in coordination with efforts focused on reversing the decline in community sentences seen over the last decade, with sustained investment in effective and credible alternatives to custody and services that help people to turn their lives around.

However, issues such as overcrowding will not be solved by solely focusing on short sentences. We must also tackle the growth in long determinate and indeterminate sentences and end the disastrous legacy of the Indeterminate sentence for Public Protection (IPP).

Sentences of less than 12 months accounted for 57% of sentenced receptions in 2018, placing huge pressure on our prison system, as people flow in and out on a daily basis.¹³ However, these sentences only account for 6% of the total prison population at any one time.

Reducing the use of short prison sentences is a necessary and important first step, but unless we also examine our sentencing framework more broadly, we will not begin to make a dent in our unenviable reputation in having one of the highest rates of imprisonment in western Europe.

As a country we choose to send people to prison for a long time, and it continues to grow. Sentence inflation in recent decades has seen substantial increases in the number of people serving what would have been seen historically as very long sentences.

More than two and a half times as many people were sentenced to 10 years or more in 2018 than in 2006.¹⁴ People serving mandatory life sentences are spending more of their sentence in prison. On average they spend 17 years in custody, up from 13 years in 2001.¹⁵ This is set to increase rapidly as judges are imposing substantially longer tariff periods.¹⁶ The average minimum term imposed for murder rose from 12.5 years in 2003 to 21.3 years in 2016.¹⁷

¹² Ministry of Justice (2013) 2013 Compendium of re-offending statistics and analysis, London: Ministry of Justice

¹³ Table A2.7, Ministry of Justice (2018) Offender management statistics: Prison receptions 2018, London: Ministry of Justice

¹⁴ Table Q5.4, Ministry of Justice (2019) Criminal justice statistics quarterly December 2018, London: Ministry of Justice

¹⁵ Table A3.3, Ministry of Justice (2019) Offender management statistics: Prison releases 2018, London: Ministry of Justice and Table A3.5, Ministry of Justice (2011) Offender management statistics: Annual prison population 2010, London: Ministry of Justice

¹⁶ Criminal Justice Joint Inspection (2013) A joint inspection of life sentenced prisoners, London: HM Inspectorate of Probation

¹⁷ Ministry of Justice (2014) Freedom of Information request 89346, London: Ministry of Justice and House of Lords written question HL2315, 6 November 2017

We are also an outlier in our use of indeterminate sentences, imprisoning more people on life sentences than any other country in Europe. Life-sentenced prisoners in the UK make up more than 10% of the total sentenced prison population, which is higher than that for any other European country—and higher than that for the United States at 9.5%.

In addition, despite abolition in 2012 the IPP continues to cast a long shadow over the criminal justice system. There are 2,403 people currently in prison serving an IPP sentence.¹⁸ Of these, nine in ten (2,198 people) have served their tariff period, the minimum period they must spend in custody.¹⁹ In 2016 PRT highlighted figures which show that IPP prisoners have among the highest rates of self-harm in the prison population. The Parole Board has predicted that without legislation there will still be 1,500 people in prison serving an IPP by 2020.²⁰ The system also faces a growing problem of IPP recalls, with an additional 1,100 people currently in prison having been recalled to custody for breaching their licence conditions.

We welcome the recent engagement of the Labour party on IPPs, including the recent Westminster Hall debate sponsored by the backbench Labour MP Tan Dhesi.²¹ Based on the policy options put forward by the Parole Board in 2016, PRT recommends that the government should:

- **Convert** the large majority of IPP sentences from indeterminate to fixed length sentences, starting with the shortest tariff lengths where the greatest injustice has occurred;
- **Protect** the public with a guaranteed minimum licence period for all cases following release, as well as introducing an independent process of judicial review to ensure that the small number IPP prisoners who would have been given a discretionary life sentence under previous legislation are appropriately dealt with; and
- **Rehabilitate**, ensuring that a proper investment is made in the support IPP prisoners receive after release, in contrast to the neglect they have suffered in custody.

6. Some groups of people, for instance women offenders or people from a BAME background, are much more likely to receive a custodial sentence for a first offence. What can we do to tackle underlying biases within the criminal justice system so sentencing is applied fairly?

The Lammy Review examined racial bias in the courts, prisons and the probation service. David Lammy established the principle of “explain or reform” when identifying and responding to unequal outcomes. This provides a blueprint for improving outcomes for people from BAME backgrounds. For example, black women are more likely than other women to be remanded or sentenced to custody as noted in PRT’s Counted Out report.²²

¹⁸ Table 1.9a, Ministry of Justice (2019) Offender management statistics quarterly: October to December 2018, London: Ministry of Justice

¹⁹ Ibid.

²⁰ Jones, M. (2016) Written advice to Nick Hardwick, London: Parole Board. Available at <http://bit.ly/IPPAdvice>

²¹ Hansard HC, 11 June 2019, c270WH, available at <http://bit.ly/2X994bs>

²² Prison Reform Trust (2017) Counted Out: Black, Asian and minority ethnic women in the criminal justice system, London: Prison Reform Trust

However, the scope of the Lammy Review begins with CPS decisions—not policing—hence it does not fully address the problem of discrimination in custodial sentencing. As the Review stated, “the system itself (from the CPS onwards) did add some degree of disproportionality”, but “rarely at the levels seen in arrest differences.”

At the time of the Lammy Review, BAME groups were over three times more likely to be subjected to stop and search, and black people were over six times more likely to be stopped by the police. Still more disproportionate is the London Metropolitan Police’s ‘Gang Matrix’. In October 2017, there were almost 4,000 people on the register. A report by Amnesty International, ‘Trapped in the Matrix’, revealed that 78% of those on the matrix were black.

Reforms to reduce disproportionate custodial rates must begin in the community, with a focus on the care system, less discriminatory school exclusions, and improved mental health provision. Within criminal justice services, it is not clear whether the Gangs Matrix provides any public benefit or is possible to reform. Police services must renew their commitment to analyse the reasons why methods of policing such as Stop and Search risk becoming institutionally racist in application.

The Prison Reform Trust Transforming Lives programme to reduce women’s imprisonment has published a series of thematic briefings on the different drivers to women’s offending and their need for distinct support, including in relation to:

- Accommodation (see our 2019 briefing “Home Truths”).²³
- Women’s primary care responsibilities for children.²⁴
- Women’s histories of victimisation, trauma and abuse (see our 2018 briefing “There’s a reason we’re in trouble”).²⁵
- Women’s unmet mental health and problematic substance use needs. Women are 5 times more likely than men to self-harm in prison.²⁶
- The specific needs of Black, Asian and Minority Ethnic Women and Muslim women who are over-represented in prison.²⁷
- The specific needs of foreign national women and trafficked women.²⁸

²³ Prison Reform Trust and Women in Prison (2018) Home truths: housing for women in the criminal justice system, London: Prison Reform Trust

²⁴ Beresford, S. (2018) What about me? The impact on children when mothers are involved in the criminal justice system, London: Prison Reform Trust and Ministry of Justice (2019) The importance of strengthening female offenders’ family and other relationships to prevent reoffending and reduce intergenerational crime, London: MoJ

²⁵ Prison Reform Trust (2017) “There’s a reason we’re in trouble”: Domestic abuse as a driver to women’s offending, London: Prison Reform Trust

²⁶ All the Transforming Lives publications can be downloaded at: www.prisonreformtrust.org.uk/women/ResourcesandPublications

²⁷ Prison Reform Trust (2017) Counted Out: Black, Asian and minority ethnic women in the criminal justice system, London: Prison Reform Trust

²⁸ Prison Reform Trust (2018) Still No Way Out: Foreign national women and trafficked women in the criminal justice system, London: Prison Reform Trust

- The exponential rise in recall of women to prison.²⁹
- The specific needs of women with learning.³⁰

73% of women given a prison sentence last year were given sentences of less than 12 months, overwhelmingly for non-violent offences. What is needed is justice reinvestment to ensure there are appropriate opportunities for early intervention, diversion and community sentences.

Women in prison in England and Wales have often been victims of more serious offences than those they are accused of committing and there is a continuing failure to take proper account of domestic abuse and coercion as a specific driver to offending for many women, in relation to prosecution, conviction and sentencing. Although the links between victimisation and offending are now better recognised, the experience of abuse and trauma is too often disregarded in decisions by criminal justice agencies.

The recent case of Sally Challen highlighted the devastating impact of coercive relationships and the lack of legal protection for victims of domestic abuse who are driven to offend.³¹ Well over half of women in prison report that they have experienced domestic abuse;³² the true figure is likely to be much higher.³³ Most women in prison are there for non-violent offences. Nearly half of women in prison, compared to only 22% of men, say they have committed offences to support someone else's drug use.³⁴ Research with 173 women screened at HMP Drake Hall found 64% reporting a history indicative of brain injury and for most this was caused by domestic violence.³⁵

We have heard from women who were convicted of offences as a direct result of domestic abuse, such as:³⁶

- Handling stolen goods under threat of violence by a partner;
- Possession of a controlled substance belonging to an abusive partner;
- Carrying a knife on behalf of an abusive partner;
- Theft offences to pay for drugs and alcohol used by them and an abusive partner;

²⁹ Prison Reform Trust (2018) Broken Trust: the rising numbers of women recalled to prison, London: PRT

³⁰ Prison Reform Trust (2019) Out of the Shadows: Women with learning disabilities in contact with or on the edges of the criminal justice system, London: PRT

³¹ 'My mother, Sally Challen, was branded a cold-blooded killer. At last she has justice', The Guardian, Saturday 8 June 2019, available at <https://www.theguardian.com/society/2019/jun/08/my-mother-sally-challen-killed-my-father-finally-justice>

³² Data Extracted from OASYS, In Thinking differently about female offenders. Transforming rehabilitation, Guidance Document. MOJ/NOMS 2014

³³ Gelsthorpe, L., Sharpe, G., and Roberts, J. (2007) Provision for Women offenders in the community London: Fawcett Society

³⁴ Light, M., Grant, E. and Hopkins, K. (2013) Gender differences in substance misuse and mental health amongst prisoners, London: MOJ

³⁵ The Disabilities Trust (2019) Making the link: Female offending and brain injury, London: The Disabilities Trust

³⁶ Prison Reform Trust (2017) There's a reason we're in trouble: Domestic abuse as a driver to women's offending, London: PRT and Criminal Bar Association of England and Wales (2017) Defences available for women defendants who are victims/survivors of domestic abuse, London: CBA

- Assault against an abusive partner or ex-partner;
- Failure to ensure a child's attendance at school for fear of abusive ex-partner; and
- Bringing drugs into prison for an abusive partner.

PRT is working with the Criminal Bar Association and others to [call for a new statutory defence](#) to be added to the Domestic Abuse Bill for those whose offending is driven by their experience of domestic abuse.³⁷ This would address a gap in current legal protection for victims/survivors, strengthen recognition of the links between victimisation and offending and deter inappropriate prosecutions. In its recent [report](#), the Joint Committee on the Draft Domestic Abuse Bill recommended that this [proposal](#) be considered by the government.³⁸ Our proposal is supported by Women's aid, the Centre for Criminal Appeals and Agenda: the alliance for women and girls at risk, amongst others.

For more information is available at www.prisonreformtrust.org.uk/women/domesticabuse

We endorse the submission by Agenda: the alliance for women and girls at risk which gives further detail on the need for improved responses to women and girls in contact with the criminal justice system and at risk of such contact.

7. How should the criminal justice system work with other public bodies to ensure people convicted of low-level offences are not dragged into a cycle of reoffending?

In addition to our response to questions 2 and 4, we would also recommend that the failed experiment of mandatory post-custody supervision for people on release from short custodial sentences is abolished. This failed measure has led to a dramatic rise in the number of people recalled back to custody, disproportionately trapping them in the net of the criminal justice system for considerably longer than is just, or reasonable.

8. If there is a presumption against short sentences, how can we ensure community-based alternatives, command the confidence of the public and the criminal justice system, as well as provide a chance for effective rehabilitation?

In addition to our response to question 4, we would caution that there is a real danger in assuming a general lack of confidence in the absence of any systematic measurement. It can become self-fulfilling and damaging in itself. The hard evidence is that community sentences already work well, and better than prison. In the past, attempts to boost confidence through "toughening up" community options have backfired, displacing cheaper and equally effective lower order disposals rather than

³⁷ Prison Reform Trust (2019) Prison Reform Trust Briefing on the Draft Domestic Abuse Bill: Pre-legislative scrutiny – April 2019, London: PRT; see also: Prison Reform Trust (2017) There's a reason we're in trouble: Domestic abuse as a driver to women's offending, London: PRT and the [accompanying briefing by the Criminal Bar Association](#).

³⁸ Joint Committee on the Draft Domestic Abuse Bill (2019) Draft Domestic Abuse Bill: First Report of Session 2017–2019, London: TSO. See also: [MacGuigan, G. and Walker R. \(2019\) Survived...but at what cost? A study of women in the criminal justice system who experienced domestic abuse, and the potential for change, London: Griffins Society](#)

custody. For men, the key challenge is to resource the range of options already available rather than to generate more.

On women, there must be a clear understanding of the particularly damaging impacts of imprisonment on women (and their families) and the futility in most cases of short custodial sentences. It is not justifiable to impose a custodial sentence because there are no adequate community sentencing options. It is of course incumbent on government to ensure the availability of community programmes of supervision and support but the lack of them is not a reason to imprison. Key to this is sustainable funding. Magistrates and judges express frustration that short term funding of key services and programmes often means the loss of support programmes and interventions just at the point where longitudinal evidence of effectiveness could be produced.

9. Which public services beyond the criminal justice system should be included in offender management?

The high levels of social exclusion and unmet need amongst people in the criminal justice system is well known, and cuts across nearly all government departments.³⁹

There are already a number of existing effective models to draw from: Youth Offending Teams; Multi Agency Public Protection Arrangements; Local Criminal Justice Boards; Liaison and Diversion Services; and Integrated Offender Management.

10. What changes need to be made to the management of women offenders in order to create a presumption against custodial sentences for non-violent offending?

The Corston Report, commissioned by a previous Labour government but never fully implemented, details the distinct needs and characteristics of women in contact with the criminal justice system and remains a blueprint for their proportionate treatment. Our 2019 briefing 'Why focus on reducing women's imprisonment: England and Wales'⁴⁰ lists the most up to date key facts and our series of thematic briefings (listed above) gives further detail and recommendations for improved policy and practice.

After many years of evidence-based advocacy by PRT and others the government published its Female Offender Strategy in June 2018. We welcome its intentions and its focus on measures to reduce the use of imprisonment for minor non-violent offences. What is missing however is a clear timetable for delivery; the necessary governance structures that will ensure sustained progress; and the allocation of sufficient funding for women's services nationwide. The availability of women specific diversion pathways, such as those operating in Manchester, Durham and Surrey, requires joined up multi-agency working and collaborative funding.

The development of blueprints to support the whole system approach to women in contact with the criminal justice system or at risk of such contact in both London and Wales is encouraging and Police and Crime Commissioners in areas such as Devon

³⁹ Social Exclusion Unit (2002) Reducing re-offending by ex-prisoners, London: HM Stationery Office

⁴⁰ Prison Reform Trust (2019) Why focus on reducing women's imprisonment: England and Wales, London: PRT

and Cornwall are leading promising joint work with local agencies. The development of a number of women specific Community Sentence Treatment Requirement sites is another positive development. Our recently updated 'Leading Change' report explains the key role of local government in achieving change for women.⁴¹ Crest Advisory's recent report "Ending the inertia for women" highlights a number of areas in which progress could be achieved.⁴² If positive initiatives are to flourish and end the postcode lottery of provision for women's services (see our local data resources for the variations in local practice)⁴³, sustainable investment is required in order to support services for women in trouble with the law.

There has been enough research and piloting over the last 20 years to know what works for women. What has been lacking is sustained government leadership and resource allocation. A statutory presumption against short prison sentences would be welcome but much can be done by ensuring there are appropriate community-based alternatives. Labour could consider establishing a Women's Justice Board to help embed the necessary systems and cultural change for women, one that recognises the intersection between victimisation and offending for so many women. We would be happy to discuss this further.

⁴¹ Prison Reform Trust (2018) Leading change; the role of local authorities in supporting women with multiple needs, London: PRT

⁴² Crest Advisory (2019) Ending the inertia for women offenders: a plan to transform outcomes, London: Crest Advisory

⁴³ Available at: www.prisonreformtrust.org.uk/women/localdataresource