

Prison Reform Trust response to HM Inspectorate of Probation's call for evidence on work with women offenders

The Prison Reform Trust is an independent UK charity working to create a just, humane and effective prison 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's main objectives are:

- Reducing unnecessary imprisonment and promoting community solutions to crime
- Improving treatment and conditions for prisoners and their families

Between 2012-15 the Prison Reform Trust (PRT) ran a 3-year programme to reduce women's imprisonment, supported by the Pilgrim Trust. Following a major grant from the Big Lottery Fund, PRT is renewing its drive to reduce women's imprisonment with a UK-wide programme, [Transforming Lives – reducing women's imprisonment](#), running from 2015-18.

In July 2015, the Prison Reform Trust wrote to the Chief Inspector of Probation asking him to undertake a thematic inspection of probation services for women in recognition of the changes to the probation landscape brought in through Transforming Rehabilitation and the impact these have had on the funding and delivery of community services working with women in the criminal justice system, and the introduction of the new statutory 12-month supervision period for all short-sentenced prisoners. The latter has the potential to lead to an increase in the number of women received into prison for breach, not least because they are disproportionately likely to be in prison serving shorter sentences, so delivering high-quality and effective services and interventions for women is critical. We therefore welcome the Inspectorate's decision to undertake this thematic inspection of work with women offenders and are pleased to submit this response to the call for evidence. We would welcome the opportunity to discuss our concerns and proposals further with the Inspectorate. The initial call for evidence is included for reference as an appendix to this preliminary submission.

Most of the solutions to women's offending lie outside prison walls in treatment for addictions and mental health problems, protection from domestic violence and coercive relationships, secure housing, debt management, education, skills development and employment. Community sentences enable women to take control of their lives, care for their children and address the causes of their offending.

Evaluations of women's centres have shown they can provide effective programmes for women offenders and women at risk of offending, and have been proven to reduce reoffending, despite the challenges presented by small cohort numbers. A recent Justice Datalab analysis of the impact on reoffending of support provided to female offenders by women's centres found that women they worked with had a one-year proven reoffending rate of 30%, compared to 35% for a matched control group of similar offenders.¹

The Prison Reform Trust has published three briefings relevant to this thematic inspection that we submit as supplementary evidence:

- [Why focus on reducing women's imprisonment?](#) sets out the key characteristics of, and drivers to, women's offending, and how they differ to men's.
- [Brighter Futures: Working together to reduce women's offending](#) presents the case for more widespread provision of targeted support to divert women out of the criminal justice system where appropriate, and for effective multi-agency working.
- [Working it out: employment for women offenders](#) summarises research on employment opportunities and outcomes for women offenders, identifies the barriers they often face, and highlights good practice in custody and the community.

Findings from Soroptimists' inquiries

Since 2012, PRT has worked in partnership with the Soroptimist UK Programme Action Committee (UKPAC) on a UK-wide project to reduce women's imprisonment. Following publication of an [action pack](#) in 2013, launched in the UK and Scottish Parliament's and at the Welsh Assembly, individual clubs embarked on a 12-month information-gathering exercise on the state of women's justice in their local communities. The wealth of submissions received from each of the UK nations was published in 2014 in [Transforming Lives: Reducing women's imprisonment](#), the report of their inquiry into provision for women in contact with the criminal justice system, which we submit as supplementary evidence to this review. The following key themes, and subsequent recommendations, emerged from their inquiries and activities in England.

¹ www.gov.uk/government/uploads/system/uploads/attachment_data/file/427388/womens-centres-report.pdf

Key finding: Widespread support for women-specific services has not yet translated into secure funding.

Recommendation: A national network of women-specific community services, including multi-agency one-stop shops and outreach services, should be funded by government, drawing on cross-departmental budgets on three to five year funding cycles and building in savings from the re-roling or closure of women's prisons.

Recommendation: The Ministry of Justice should undertake an annual audit and evaluation of probation services provided in accordance with Section 10 of the Offender Rehabilitation Act 2014 to meet the particular needs of female offenders.

Key finding: There is uneven awareness of women-specific services, and their effectiveness, amongst the judiciary.

Recommendation: Community Rehabilitation Companies (CRCs), in consultation with the police, council and service providers, should develop directories of local services for women offenders. Information on services available locally should be shared with the National Probation Service to inform pre-sentence reports and sentence recommendations.

Key finding: availability of women-specific community sentencing options is limited in many areas, with provision in rural areas remaining a challenge.

Recommendation: Criminal justice inspectorates and regulators should monitor and report on the provision of local women-specific measures, especially in light of Section 10 of the Rehabilitation of Offenders Act 2014. The Joint inspectorate review *Equal but different?* is an excellent example.

Source: pp. 69-97, Prison Reform Trust (2014) *Transforming Lives - reducing women's imprisonment* London: PRT

Limited and short-term funding for women's community services, and the challenge of rural provision, were also key findings of Soroptimist inquiries in Wales.

The report also highlights how local clubs have supported women's services (see pages 100-104 for full details). As is clear from the information below, a number of clubs and individual Soroptimists have ongoing relationships with local women's services, advocating on behalf of services with statutory agencies, fundraising, board membership and supporting service delivery.

- Soroptimists in Heswall have a long-standing relationship with Tomorrow's Women Wirral - 21 soroptimists volunteer at the centre, including two who are members of its conditional cautioning scheme, whilst the Chair of the Board is also a soroptimist.
- Bristol soroptimists volunteer, and sit on the board of trustees, at Eden House women's centre in the city.

- Funding from local soroptimists has enabled the Bradford Together Women Project (TWP) to employ a parenting and childcare development worker at the centre and a family resettlement worker at HMP New Hall. The centre worker provides childcare for mothers using the centre's services, and delivers a special programme to help disadvantaged mums improve their parenting skills. The worker at HMP New Hall delivers specialist support to women in prison to help them maintain contact with their families.
- In Barrow-in-Furness, soroptimists act as both trustees and volunteers at Women's Community Matters, supporting vulnerable women, many of whom have experience of the criminal justice system, through financial hardship, domestic violence and other difficulties.
- A local soroptimist was supporting delivery of the Folkestone Women's Group for women supervised by Kent, Surrey and Sussex CRC but the group has since closed due to staff sickness and shortages. Because there is no women's provision in Ashford, attendees now have to travel to Canterbury. It is hoped the group will be reinstated once staff have been recruited and trained but as yet no date has been set.
- Clubs in Cheltenham and Swindon are forging links with ISIS women's centre in Gloucester following a request from the centre manager for soroptimist support. ISIS workers have spoken at soroptimist club meetings, soroptimists have attended open days and local conferences, including one celebrating the centre winning the Howard League for Penal Reform Community Award for Women's Services in 2013, and members provide festive shoeboxes to women using the centre at Christmas.

We circulated the call for evidence for this thematic inspection to soroptimist clubs and understand a number have submitted up-to-date information on local service provision, including SI Bristol, SI Wigan and SI Barrow in Furness.

Despite assurances that most of the women's services contracted by probation pre-March 2015 would receive interim funding by the newly privatised CRCs to tide them over, comprehensive information is not available and we are concerned that 'commercial sensitivity' arguments are inhibiting transparency. This inspection therefore provides an opportunity to audit what women-specific provision individual CRCs are offering² and whether women's centres and other gender-specific community services have to-date been commissioned. We strongly recommend the Inspectorate seek access to the Schedule 6 detail itemising the services for women which each CRC is contractually obliged to deliver, and considers whether expenditure on service provision for women offenders in each area is commensurate

² In line with both Section 10 of the Offender Rehabilitation Act 2014 and the three gender-specific outputs included by NOMS in CRC contracts - see page 2 for further discussion

with the number of women supervised and the complexity of their needs.³ For example, given the evidence of abusive and coercive relationships as a factor in women’s offending, and their primary care responsibilities, we would expect to see a requirement for domestic violence and family support services to be available to women offenders, and for these factors to be considered for example when considering whether a woman should be breached during her supervision or community order. We note the recent Inspectorate follow-up report on implementation of Transformation Rehabilitation, which found “*examples of very swift enforcement*” and are concerned at the implications of such an approach to non-compliance for women, given the complex factors, including childcare, domestic violence and reporting offices shared with male offenders, which can stop women from attending appointments.⁴ The need and scope for co-operation between domestic violence and women offender services has been highlighted recently in the NOMS-funded Llywbrau project,⁵ which we commend. Finally, we recommend this thematic inspection consider how the National Probation Service (NPS) and CRCs are working together to deliver appropriate pre-sentence reports for women and whether women’s centres and other specialist community services are involved in this process.

The Prison Reform Trust, alongside supporters including the Soroptimist UKPAC, was pleased to help secure the first statutory safeguard for women’s services in Section 10 of the Offender Rehabilitation Act 2014.

Arrangements for supervision and rehabilitation: female offenders

In section 3 of the Offender Management Act 2007 (power to make arrangements for the provision of probation services), after subsection (6) insert—

“(6A) The Secretary of State must ensure that arrangements under subsection (2) or (5) for the supervision or rehabilitation of persons convicted of offences—

(a) state that the Secretary of State has, in making the arrangements, complied with the duty under section 149 of the Equality Act 2010 (public sector equality duty) as it relates to female offenders, and

(b) identify anything in the arrangements that is intended to meet the particular needs of female offenders.”

Source: www.legislation.gov.uk/ukpga/2014/11/section/10/enacted

³ At 31st March 2015, women accounted for 14% of all those supervised by CRCs. See Table CaseloadQ1 in CSV datasets and variable guide, Ministry of Justice (2015) *Offender management statistics quarterly: January to March 2015* MoJ: London

⁴ HM Inspectorate of Probation (2015) *Transforming rehabilitation – Early implementation 2: An independent inspection of the arrangements for offender supervision* HMIP: London

⁵ NOMS Wales and Women’s Pathfinder (2015) *The Llywbrau project* NOMS: London

If implemented properly, Section 10 has the potential to secure services for women offenders. We regard the three gender specific outputs that were required in CRC contracts as minimal and not optimal in terms of addressing the needs of women and reducing the risk of their reoffending.

Update on progress made against delivery of the Government's strategic objectives for female offenders, 2014

Providers will need to give female offenders the option, where practicable, of (i) having a female supervisor/responsible officer; (ii) attending meetings or appointments in a female-only environment; and (iii) of not being placed in a male-only environment for unpaid work or attendance requirements.

Likewise, the belated NOMS publications *Effective interventions for women offenders: a rapid evidence assessment* (published in July 2015), aimed at assisting the design of an evidence-based commissioning strategy,⁶ and *Better outcomes for women offenders* (published in September 2015), setting out commissioning principles for women offenders,⁷ may have come too late to be taken into account by CRCs when scoping and tendering for services for women.

Funding and commissioning of women's services

The sustainability of women's community services has long been a concern, as recognised by the Justice Committee in its March 2015 follow-up report on women offenders:

*"We are concerned that funding appears to be a recurring problem for women's centres and that future funding arrangements have not been put on a sound basis as we recommended...we reiterate our recommendation that sustainable funding of specialist women's services should be a priority."*⁸

In 2013, Clinks published [Run Ragged](#), an interim study of the experiences of projects providing community support services to women offenders, followed in 2014 by [Who Cares? Where next for women offender services?](#) Run Ragged identified that 89% of projects felt their service was less secure or as insecure as in the 12 months previously, whilst Who Cares reported that *"on the ground, the financial situation for projects is still unstable, and possibly less stable than before."*

Probation trust funding (delivered by the publicly-owned CRCs until 1st February 2015 when ownership of CRCs was transferred to a number of private operators) of women's community services came to an end in March 2015. Because of delays in setting up supply-chains and the length of time it has taken the newly privatised

⁶ www.gov.uk/government/uploads/system/uploads/attachment_data/file/448859/effective-interventions-for-women-offenders.pdf

⁷ www.gov.uk/government/uploads/system/uploads/attachment_data/file/457922/Better_Outcomes_for_Women_Offenders_September_2015.pdf

⁸ House of Commons Justice Committee (2015) *Women offenders: follow-up* TSO: London

CRCs to get up and running, it is feasible that some longstanding services won't have sufficient reserves to sustain them in the interim and will have disappeared by the time CRCs are in a position to contract. Anecdotally, we are aware of some women's services that have been told they are "too expensive" by the responsible CRC, who say they have inherited greater numbers of probation staff than expected so are reducing expenditure on external providers.

We understand that some women's services have already closed, reduced their services or put their staff on redundancy notice,⁹ as a result of funding uncertainty following March-2015. Some CRCs did offer last-minute interim 3-6 months funding whilst they scoped and mapped service provision and reviewed plans. In other areas, CRCs are reported to be bringing women-specific service provision in-house to save money or are putting contracts out to competitive tender, despite assurances during the bidding process that they would work with specified women's-service providers which have proved their effectiveness. For example, Changing Lives, the operator of the women's centre in Cardiff, was told its contract was not going to be renewed, despite having been named as a sub-contractor in the original bid submitted to NOMS by Working Links. The service has now closed, leading to the loss of long-standing staff, expertise and local knowledge, though we welcome the fact that the city centre premises have been retained by the CRC as a women's hub. In Durham and Tees Valley CRC, meanwhile, we understand an IOM diversionary project supported by both Durham Police and the probation trust, and profiled in our 2014 report [Brighter Futures](#),¹⁰ has been scrapped, whilst Thames Valley CRC is withdrawing funding for work with women offenders delivered by Alana House, an award-winning women's centre in Reading with a six-year record of working with probation services, from 1st October.¹¹

In Brighton where the Inspectorate has recently undertaken an inspection of early work and effective recording,¹² Brighton Women's Centre has delivered the Inspire Project "supporting women with multiple vulnerabilities at all stages of involvement in the criminal justice system".¹³ In 2015 it was highly commended by the Criminal Justice Alliance (CJA). Following the probation split, SEETEC, the operator of Kent, Surrey and Sussex CRC, announced it was moving to open procurement for its women-offenders service offer, and published a service specification for 'women's reporting centres and wrap-around services'. This explained that "core work [including assessment, rehabilitation, interventions and resettlement] with all service users [will be] carried out by KSS CRC" with the CRC offering contracts for women-only reporting centres and 'wrap-around support' for core work.¹⁴ In Brighton, the

⁹ We understand that for some women's services, this has been a regular occurrence due to the short-term and last-minute nature of funding cycles and probation contracts

¹⁰ See page 24, Prison Reform Trust (2014) *Brighter Futures – Working together to reduce women's offending* PRT: London

¹¹ PACT press release, 23rd September 2015, 'Funding for women ex-offenders at Alana House cut'

¹² In East Sussex and Brighton (no report published yet)

¹³ www.womenscentre.org.uk/services/inspire/

¹⁴ Kent, Surrey and Sussex CRC (2015) *Women's reporting centres and wraparound services – Document 2: Service Specification*

reporting centre contract is for delivery of a centre operating for just one hour a week.

Whilst a commitment to maintaining female-only reporting times is to be welcomed, there are few women's centres that will be able to sustain their services in return for a contract providing premises operating for one hour a week. This will leave women's centres and other women's community services more reliant on funding from other sources, such as local authorities, trusts and independent funders, at a time when competition for limited funds is fierce (and further local authority cuts are due), and will inevitably mean some services, and the experienced staff who have been critical to their success, are lost.

In June 2015, we wrote to all CRC Chief Executives and women's leads, asking whether they had provided interim funding to existing women's services and for information about arrangements being made for the women offenders they supervised, including any women-specific services which had been contracted, and a description of the services they are contractually obliged to deliver (under Schedule 6). We received just two responses: from Staffordshire & the West Midlands CRC (responding on behalf of Derbyshire, Leicestershire, Nottinghamshire & Rutland as both are run by the Reducing Reoffending Partnership and are working together to develop provision for women offenders), and Cumbria and Lancashire CRC:

- Staffordshire & the West Midlands (SWM) and Derbyshire, Leicestershire, Nottinghamshire & Rutland (DLNR) told us:
 - all current contracts (within both CRCs) have been extended until the end of December 2015;
 - a women's strategy group has been meeting fortnightly to progress future service provision and has scoped the required provision and the required outcomes;
 - the strategy group are working alongside all of the women's organisation in an attempt to develop an alliance contracting approach - with one contract for each of the CRCs;
 - once future provision has been agreed information will be provided to CRC and NPS staff about the range of provision, referral criteria and process etc;
 - the new service will be stood up on the 1 Jan 2016.
- Cumbria & Lancashire CRC told us they are funding Lancashire Women's Centres (as per the grant arrangement which was previously in place), ensuring there is no gap in provision whilst any supply chain issues are rectified. As Lancashire Women's Centres are in the Sodexo supply chain, services for women remain unchanged from the "*previous excellent delivery*". Lancashire Women's Centres will have a total of 10 centres across Lancashire and Cumbria delivering bespoke services to women. The basic service offered will include:

- 1-1 support for relationships; health/ mental health; housing; substance misuse; education, training and employment; debt, benefits and finance; and victim awareness and citizenship;
- group programmes focusing on all issues addressed above, building resilience and modelling appropriate behaviours;
- women-only Community Payback delivery;
- a qualified and trained mentor who will offer open-ended support to complete an action plan and ongoing engagement with other agencies;
- a signposting service in-house (if available) or to external agencies to address specific needs identified.

We are grateful to the Inspectorate for undertaking this thematic and for the opportunity to submit preliminary evidence. We would welcome the opportunity for further discussion about the extent, quality and effectiveness of services for women offenders.

Appendix: Call for evidence from HM Inspectorate of Probation Thematic inspection of work with women offenders

HM Inspectorate of Probation is collecting evidence for its thematic inspection of work with women offenders. We are keen to hear about the provision and gaps in services for women who offend, so we can establish the current landscape.

The issues we would like to hear your views on:

- Do you provide or access specific services for women offenders? Please tell us about them.
- Are women's centres operating in your area? If so, who runs them and who funds them?
- What are the barriers to doing gender-specific work in your area?
- What has changed in terms of working with women offenders over the past two years? Have things improved, deteriorated or stayed the same?
- Do you have any examples of good practice of work with women offenders or case studies you would like to tell us about?
- Are there areas that would be good for us to visit to see work with women offenders?
- Please tell us about your work with women offenders

It is not necessary to respond to all of these. Please concentrate on the issues you think are most important, or which you have most to say on. We may publish your evidence in our report, or follow up your comments with further enquiries: please let us know if there is a reason you would prefer to submit evidence privately, or you would prefer not to be contacted further about your submission.

Contributions by email from everyone in any format are very welcome: videos, blog posts as well as written reports.

Please do circulate this email to any of your contacts who might be able to help us.

- Email to: kevin.ball@hmiprobation.gsi.gov.uk